



**CONSOLIDATED PLAN
HUD FISCAL YEARS 2019-2023**

**Community Development Block Grant (CDBG)
HOME Investment Partnership (HOME)
Emergency Solutions Grant (ESG)**

Lee County Board of County Commissioners
Human and Veteran Services
Brian Hamman, Vice Chair, Board of County Commissioners
Roger Desjarlais, County Manager
Glen Salyer, Assistant County Manager
Roger Mercado, Director, Human and Veteran Services

Executive Summary

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

1. Introduction

The 2019-2023 Consolidated Plan is a required submission to sustain entitlement funding from the U.S. Department of Housing and Urban Development (HUD). The Community Development Block Grant (CDBG), HOME Investment Partnership Program (HOME), and the Emergency Solutions Grant (ESG) programs are continued through this process. This five-year plan identifies community needs, and sets goals and objectives to address those needs with this funding. The Annual Action Plan for HUD Program Year 2019 is also included herein, and will provide more detailed information regarding the first year's use of funds.

2. Summary of the objectives and outcomes identified in the Plan Needs Assessment Overview

There are five priority needs identified here within. Those needs are affordable housing, housing and services for the homeless, public facility improvements, economic development and community revitalization.

This plan outlines eight goals and a variety of outcome indicators to address the identified needs. Those goals and outcomes are as follows:

1. Affordable Housing Development

Outcome 1: Rental Housing Added: 100 units

Outcome 2: Homeowner Housing Added: 5 units

2. Housing Rehabilitation and Reconstruction

Outcome 1: Rental Housing Rehabilitated: 20 units

Outcome 2: Homeowner Housing Rehabilitated: 198 units

3. Down Payment Assistance

Outcome 1: Assistance to Homebuyers: 131 households

4. Housing and Services for Persons who are Homeless

Outcome 1: Public Service Activities (other than housing): 2125 persons

Outcome 2: Tenant Based Rental Assistance/Rapid Re-Housing: 315 households

5. Public Services for Community Revitalization

Outcome 1: Public Service Activities (other than housing): 9495

6. Infrastructure Improvements

Outcome 1: Infrastructure Activities (other than housing): 10,000 persons

7. Economic Development

Outcome 1: Businesses Assisted: 1 business

8. Public Facility Improvements

Outcome 1: Public Facilities Improved: 5 non-profit organization

3. Evaluation of past performance

Past project, performance provided the framework for discussion and selection of the goals and projects within this plan. Projects such as Owner Occupied Rehabilitation, carried out with CDBG funds, and Down Payment Assistance, carried out with HOME funds, have had long-term success within Lee County. Since 2013, more than 150 owner occupied homes have been rehabilitated, and more than 100 homebuyers have received down payment assistance. Successful outcomes were also obtained through the HOME Tenant Based Rental Assistance (TBRA) program, which housed more than 150 households who were experiencing homelessness or were victims of Hurricane Irma. These programs will remain within this new five-year plan. Many of the programs from previous plans will be continued due to continued need, and past successes. Priorities have been re-organized to better reflect community need.

4. Summary of citizen participation process and consultation process

Citizen participation was gathered through a series of eight public meetings, entitled *Community Conversations*, which were held throughout Lee County. Attendees at these meetings included representatives from non-profit organizations, neighborhood advisory councils, Southwest Florida Community Foundation, Coalition for a Drug Free Southwest Florida, United Way, Lee Health, faith based community partners, Goodwill of Southwest Florida, SalusCare, local media, Cape Coral Police Department, City of Fort Myers, City of Sanibel, City of Bonita Springs, and Lee County residents.

The meetings provided attendees with an overview of the Consolidated and Annual Planning process, and an overview of current funding allocations. Attendees were also provide an opportunity to explain the existing needs and assets within their community, and all of Lee County. Most meeting attendees also completed a ranking sheet, where they ranked their top three priorities in categories including housing, economic development, homelessness, fair housing, transportation, public facilities, and public services.

All meetings were advertised in the local newspaper, distributed to local non-profit organizations via email, by Lee County press release, posted in the lobby of Human and Veteran Services, on the Lee County website, on the Human and Veteran Services Facebook page, and distributed in paper format to residents via service providers.

Consultation was conducted via e-mail, one-on-one meetings, and at a group consultation meeting on February 13, 2019. Attendees at the group consultation meeting included representatives from the Public Housing Authority, City of Cape Coral, City of Bonita Springs, Public Defenders Office, Hendry County, and others. The meeting provided attendees with an overview of the Consolidated and Annual Planning process and recent data regarding outcomes, funding allocations and community characteristics, and solicited input regarding the goals and priorities found here within. Additional consultation was conducted at the Affordable Housing Committee and Human Services Council meetings.

5. Summary of public comments

Significant public comment was received during *Community Conversation* meetings. A summary of comments received and the results of ranking forms completed during the meetings are attached to this plan, and can be viewed in section PR 15.

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

All comments received were considered during the formation of the plan and selection of projects to be carried out over the 2019-2023 planning cycle.

The Process

PR-05 Lead & Responsible Agencies 24 CFR 91.200(b)

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

Agency Role	Name	Department/Agency
CDBG Administrator	LEE COUNTY	Human and Veteran Services
HOME Administrator	LEE COUNTY	Human and Veteran Services
ESG Administrator	LEE COUNTY	Human and Veteran Services

Table 1 – Responsible Agencies

Lee County Human and Veteran Services (HVS) is responsible for preparing the Consolidated Plan. Lee County's entitlement consists of Community Development Block Grant (CDBG), HOME Investment Partnership Program (HOME), and Emergency Solutions Grant (ESG) programs, all of which are administered by HVS managers in several departmental program areas, with clerical and fiscal support. Sub-recipient contracts with Urban County partners are monitored by HVS, but fieldwork is completed by City of Bonita Springs, Town of Fort Myers Beach, Village of Estero and City of Sanibel staff.

The Town of Fort Myers Beach has elected to terminate participation in the Urban County agreement effective at the start of the HUD 2020 program year. Programs currently being carried out by the Town of Fort Myers Beach will be continued through September 20, 2020.

Consolidated Plan Public Contact Information

Questions and correspondence relating to the Consolidated Plan should be directed to Jeannie Sutton, Acting Operations Manager, Lee County Human and Veteran Services by mail at 2440 Thompson St., Fort Myers, FL 33901, by phone at 239-533-7958, by fax at 239-533-7960, or by e-mail at jsutton@leegov.com.

PR-10 Consultation - 91.100, 91.200(b), 91.215(I)

1. Introduction

Consultation on the development of the plan began in July 2018, and was achieved through a variety of strategies, such as: planning meetings, direct correspondence, and one-on-one meetings. All efforts were made to contact appropriate parties and obtain input. These consultations, and input received from residents, provided the framework for the plans and projects outlined here within. Solicitation for input on the Community Strategic Plan, Homeless Strategic Plan, and Regional Analysis of Impediments to Fair Housing Choice was also received during the public participation process for the 2019-2023 Consolidated and 2019 Annual Action Plans.

Provide a concise summary of the jurisdiction's activities to enhance coordination between public and assisted housing providers and private and governmental health, mental health and service agencies (91.215(I)).

Coordination between public and assisted housing providers and private and governmental health, mental health and service agencies occurs on a regular basis to provide coordinated client services, and for the development of this plan. The Bob-Janes Triage Center and Low-Demand Shelter continues to provide an example of this community-wide coordination. The Triage facility is jointly funded and managed by Lee County Human and Veteran Services, the Salvation Army, and SalusCare, and partners with local law enforcement and homeless service providers. Staff from local non-profit service providers, Lee Health, law enforcement agencies, and public housing agencies regularly meet and carry out planning efforts to address community needs, such as the during the development of the CoC's 2019 Strategic Plan.

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

Lee County Human and Veteran Services is the Lead Agency for the Continuum of Care, and has spearheaded the local effort to ensure compliance with the HEARTH Act provisions. There is continuous coordination between Lee County, the Lee County Homeless Coalition, and the Continuum as a whole, to address the needs of persons who are homeless or at risk of homelessness. This includes discharge planning, identifying needs and gaps in the community, evaluating system and project performance, establishing system-wide written standards, and researching project models and funding sources.

Lee County Human and Veteran also lead the *Zero: 2016* initiative, and successfully achieved functional zero status for veteran homelessness in 2016. The County continues allocate more than \$1.5 million in HUD Continuum of Care funds to provide rapid re-housing assistance to families with children. Remaining Continuum of Care funds are allocated for Permanent Supportive Housing projects, which are prioritized for individuals who are chronically homeless. State Emergency Solutions Grants, Temporary Assistance for Needy Families - Prevention, and Challenge grants funds are used to provide homelessness prevention assistance for persons at risk of homelessness. Additionally, the Lee County Continuum of

Care has recently completed a new strategic plan based on the goals and framework of "Home, Together: The Federal Strategic Plan to End Homelessness".

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

As previously noted, Lee County is the Lead Agency for the Continuum of Care, and is in continuous consultation with the Continuum Governing Board and General Membership, including consulting on ESG Planning. Continuum members continue to support the current ESG program structure, in which Human and Veteran Services administers a portion of the ESG allocation to provide outreach and rapid re-housing assistance to eligible households and allocates remaining funds for shelter operations.

In 2017, the Continuum of Care Governing Board established new project performance targets and approved continuum-wide written standards. In January 2018, the Board also approved the Coordinated Entry policies and procedures in accordance with CPD Notice 17-01. ESG projects are monitored annually, and outcomes are included in system performance measures.

The Lee County Continuum of Care Governing Board was consulted during their February 13, 2019 and June 12, 2019 meetings. During the meeting, Board members voted to change ESG funding from funding the operations of the Bob Janes Triage Center to funding Rapid Re-Housing for persons admitted to the Bob Janes Triage Center, and to continue the Rapid Re-Housing program administered by Human and Veteran Services.

The CoC general membership was also encouraged to attend Community Conversation meetings and provide input on the draft Consolidated Plan.

Table 2 – Agencies, groups, organizations and others who participated in the process and the jurisdictions consultations with housing, social service agencies and other entities:

1	Agency/Group/Organization	Lee County Homeless Coalition
	Agency/Group/Organization Type	Advocacy Group for the Homeless
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homelessness Strategy Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Market Analysis Anti-poverty Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Consultation with the Homeless Coalition was conducted as part of the Continuum of Care Governing Board consultation on February 13, 2019. This consultation included discussion of the services and housing available for individuals and families who are homeless, and an analysis of gaps. The Board and Coalition representative agreed the ESG funds should be maintained for the rapid re-housing program administered by Lee County Human and Veteran Services, and to provide rapid re-housing for persons at the Bob Janes Triage Center. Additional needs for persons who are homeless were also discussed, including the need for additional outreach staff and both emergency shelter and permanent housing beds. A detailed list of needs, goals, and objectives is provided in the Lee County CoC Strategic Plan, which the CoC adopted in April 2019.
2	Agency/Group/Organization	Human Services Council
	Agency/Group/Organization Type	Business and Civic Leaders
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Non-Homeless Special Needs Economic Development Anti-poverty Strategy

<p>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</p>	<p>The Human Services Council is an advisory board to the Lee County Board of County Commissioners. It's members include law enforcement, local government officials, and representatives from various social and nonprofit organizations. Eleven attendees were present at the January 15, 2019 Human Services Council meeting. An overview of the Con Plan, Annual Action Plan, Analysis of Impediments to Fair Housing, Community Strategic Plan, and Homeless Strategic Plan was provided. Conversation was held regarding needs in the areas of housing, homelessness, and others. Discussion was held regarding the following areas: Crime Prevention - one attendee mentioned the need to make people more aware of the programs that are currently available Homelessness - Discussion was held regarding the relationship between CCPD and the homeless, an emphasis was placed on the importance of the relationship between law enforcement officers and individuals who are homeless to build trust and eventually assist in seeking services. The need for additional homeless shelters, especially in Cape Coral, was mentioned. Discussion was also held regarding the visibility of homelessness and finding solutions to reduce such. Housing - emphasis was placed on the need for affordable housing. Public Participation - attendees discussed the importance of hearing from residents regarding needs and made suggestions to improve public participation, including using the faith based community and engaging businesses.</p>
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<p>3</p>	<p>Agency/Group/Organization</p>	<p>Community Action Agency/Neighborhood District Council</p>
	<p>Agency/Group/Organization Type</p>	<p>Civic Leaders Neighborhood Non-Profit Organizations and Advisory Councils Neighborhood Organization</p>
	<p>What section of the Plan was addressed by Consultation?</p>	<p>Housing Need Assessment Homelessness Strategy Non-Homeless Special Needs Economic Development Anti-poverty Strategy</p>
<p>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</p>	<p>Eleven members of the Community Action Agency/Neighborhood District Council and seven members of the public attended the November 15, 2018 meeting. An overview of the Con Plan, Annual Action Plan, Assessment of Fair Housing, Community Strategic Plan and Homeless Strategic Plan was provided, and various community needs were reviewed and ranked by all attendees. Suggestions were made to consider implementing ride share programs, non-profit and faith based transportation networks and car repair programs for low-income households as a means to low transportation costs. Additional discussion was held regarding providing employment opportunities for non-violent felons, facade and building rehabilitation for small businesses, and the need for low cost housing developed by non-profit organizations.</p>	

4	Agency/Group/Organization	City of Sanibel
	Agency/Group/Organization Type	Other government - Local
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Public Housing Needs Homelessness Strategy Economic Development Market Analysis Anti-poverty Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Representatives from the City of Sanibel, including City Council member Holly Smith, were present at the December 4, 2018 Community Conversation meeting on Sanibel. Nine attendees were present at the December 4, 2018 meeting, three representatives from the City of Sanibel, and two from Sanibel's affordable housing developer, Community Housing and Resources (CHR). An overview of the Con Plan, Annual Action Plan, Fair Housing Plan, Community Strategic Plan, and Homeless Strategic Plan was provided, and a list of community needs were reviewed and ranked by all attendees. Varieties of needs on Sanibel were discussed. The group identified a significant need to support affordable housing, primarily the preservation and development of rental housing. Secondly, needs for workforce transportation were identified, as many employees on the island commute long distances. Discussion regarding fair housing practices on the island revealed that there are few instances of discrimination, but attendees voiced the importance of having multilingual staff to ensure persons with limited English proficiency have access to services. Comments regarding services for youth and adults indicated a need for increased mental health and substance abuse treatment and substance abuse prevention programs for youth.
5	Agency/Group/Organization	City of Bonita Springs
	Agency/Group/Organization Type	Other government - Local
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homelessness Strategy Non-Homeless Special Needs Economic Development Market Analysis Anti-poverty Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	A representative from the City of Bonita Springs was present at the February 13, 2019 Local Government Consultation meeting. Varieties of needs in Bonita Springs were discussed, including the need for multi-use paths and connectivity for pedestrians and cyclists. Additionally, the City of Bonita Springs representative emphasized the need for storm water drainage improvements within their jurisdiction, especially in low-income areas with aging pipes that were impacted during Hurricane Irma.

6	Agency/Group/Organization	Habitat for Humanity of Lee and Hendry Counties
	Agency/Group/Organization Type	Housing Services - Housing Regional organization
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Market Analysis
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	A representative from the Habitat for Humanity was present at the February 13, 2019 Local Government Consultation meeting. A variety of housing needs were discussed, including affordable rental units and housing rehabilitation for seniors on a fixed income is a need countywide. Habitat also advocated for the need for affordable home ownership. The group discussed the need to use shared, scattered site, infill, and redevelopment of existing facilities, such as old shopping centers and hotels, for affordable housing. Lee County and Habitat for Humanity has a continuing partnership to provide housing resources for low- and moderate-income households.

7	Agency/Group/Organization	City of Cape Coral Planning and Growth Management Division
	Agency/Group/Organization Type	Other government - Local
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homelessness Strategy Non-Homeless Special Needs Economic Development Market Analysis Anti-poverty Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	A representative from the City of Cape Coral was present at the February 13, 2019 Local Government Consultation Meeting. A variety of needs in Cape Coral were discussed, including the need for affordable housing and housing rehabilitation for seniors who are on fixed incomes, the use of existing green spaces for public recreation, and the need for higher paying jobs. The City of Cape Coral and Lee County have a continuing partnership to address impediments to fair housing choice in the region. As part of this partnership, the City provided an analysis of impediments to fair housing in the Cape, and highlighted specific topics including the importance of scattering affordable housing region-wide.

8	Agency/Group/Organization	Hendry County
	Agency/Group/Organization Type	Other government - County
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homelessness Strategy Non-Homeless Special Needs Economic Development Market Analysis Anti-poverty Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	A representative from Hendry County Housing and Social Services Department was present at the February 13, 2019 local government consultation meeting. Hendry County, an adjacent county to Lee, provided input regarding community needs, including the need for affordable housing near employment, and the need for increased income. Lee and Hendry Counties coordinate when possible, and both participate in regional initiatives and organizations.

9	Agency/Group/Organization	Lee County Parks and Recreation
	Agency/Group/Organization Type	Other government - County Grantee Department
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homelessness Strategy Non-Homeless Special Needs Economic Development Market Analysis Anti-poverty Strategy Public Facilities
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Lee County Parks and Recreation provided input during the February 13, 2019 Local Government Consultation meeting. Public facilities specifically related to park and recreational needs were discussed during the meeting. Needs included use of existing green spaces for public recreation, and public input received regarding the need for neighborhood parks. Human and Veteran Services and Parks and Recreation regularly partners for projects within the existing five target neighborhoods.

10	Agency/Group/Organization	State Attorney's Office
	Agency/Group/Organization Type	Publicly Funded Institution/System of Care
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homelessness Strategy Non-Homeless Special Needs Economic Development Market Analysis Anti-poverty Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	The Chief Assistant State Attorney provided input during the February 13, 2019 Local Government Consultation meeting. Housing and service needs for justice-involved clients were discussed during the meeting. Needs included housing for individuals with criminal backgrounds, re-entry housing for persons exiting jails, additional case management for individuals entering the Bob Janes Triage Center, better connection/re-connection with social services and benefits, including assistance with drivers licenses and IDs upon exit from jails. Representatives also discussed the need to increase engagement with Law Enforcement to assist with engaging homeless persons, and take a collaborative approach to assisting persons who are homeless.

11	Agency/Group/Organization	Law Offices of the Public Defender
	Agency/Group/Organization Type	Publicly Funded Institution/System of Care Regional organization
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homelessness Strategy Non-Homeless Special Needs Economic Development Market Analysis Anti-poverty Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	The Public Defender provided input during the February 13, 2019 Local Government Consultation meeting. Housing and service needs for justice-involved clients were discussed during the meeting. Needs included housing for individuals with criminal backgrounds, re-entry housing for persons exiting jails, additional case management for individuals entering the Bob Janes Triage Center, better connection/re-connection with social services and benefits, including assistance with drivers licenses and IDs upon exit from jails. Representatives also discussed the need to increase engagement with Law Enforcement to assist with engaging homeless persons, and take a collaborative approach to assisting persons who are homeless.

12	Agency/Group/Organization	United Way of Lee, Hendry, Glades, and Okeechobee Counties
	Agency/Group/Organization Type	Services - Housing Services-Children Services-Elderly Persons Services-Persons with Disabilities Services-Persons with HIV/AIDS Services-Victims of Domestic Violence Services-homeless Services-Health Services-Education Services-Employment Service-Fair Housing Services - Victims Regional organization
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homelessness Strategy Non-Homeless Special Needs Economic Development Market Analysis Anti-poverty Strategy
How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	A representative from United Way was present at the February 13, 2019 Local Government Consultation Meeting. Varieties of needs were discussed, including the need for affordable housing. The representative noted that the top need identified in the monthly report of call to the United Way is affordable Housing. The ALICE report, completed by the United Way, also indicated a need for higher paying jobs. UW has also seen and increased need for technology skills for those in job market, and has developed a digital training program to try to meet that need. Lee County has an extensive partnership with United Way, and will continue to work closely with them to meet community needs.	

13	Agency/Group/Organization	City of Fort Myers
	Agency/Group/Organization Type	Other government - Local
	What section of the Plan was addressed by Consultation?	<p>Housing Need Assessment</p> <p>Homelessness Strategy</p> <p>Homeless Needs - Chronically homeless</p> <p>Homeless Needs - Families with children</p> <p>Homelessness Needs - Veterans</p> <p>Homelessness Needs - Unaccompanied youth</p> <p>Non-Homeless Special Needs</p> <p>Economic Development</p> <p>Market Analysis</p> <p>Anti-poverty Strategy</p>
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	<p>The City of Fort Myers was unable to attend the Local Government Consultation meeting, but provided input via e-mail on April 19, 2019. The City provided information regarding the market conditions within the City Limits, including the median income, which is \$11,419 less than the median income of the whole County. The City stated that both large and small housing units are needed to meet current demands. The City also discussed the aging housing stock within the City limits and emphasized the need for reconstruction. Over 70% of the Cities youth are either Hispanic or African American, and over 38% of the all Lee County Black or African American residents live within the City of Fort Myers. The City also has a high concentration of cost-burdened renters. The City emphasized the need for workforce development programs, higher paying jobs, and improving accessibility to transportation. A representative for the City of Fort Myers is also present on the CoC Governing Board and provided input regarding homelessness during the consultation with the CoC. The County has extensive partnership with the City of Fort Myers, and will continue this relationship to meeting community needs.</p>

14	Agency/Group/Organization	Housing Authority of the City of Fort Myers
	Agency/Group/Organization Type	Housing PHA
	What section of the Plan was addressed by Consultation?	Public Housing Needs Homelessness Strategy Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	A representative from the Housing Authority of the City of Fort Myers was present at the February 13, 2019 Local Government Consultation Meeting. Varieties of needs were discussed, including the need for affordable housing. The representative noted the need for additional affordable housing units. Lee County has an extensive partnership with PHA, and will continue to work closely with them to meet community needs. A representative for the City of Fort Myers is also present on the CoC Governing Board and provided input regarding homelessness during the consultation with the CoC.
15	Agency/Group/Organization	Affordable Housing Committee/Lee County Community Development
	Agency/Group/Organization Type	Housing Other government - County Planning organization Business and Civic Leaders Grantee Department
	What section of the Plan was addressed by Consultation?	Housing Need Assessment

	<p>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</p>	<p>Six members of the Affordable Housing Committee and three of the public attended. An overview of the Con Plan, Annual Action Plan, Analysis of Impediments to Fair Housing, Community Strategic Plan, and Homeless Strategic Plan was provided. Conversation was held regarding needs in the areas of housing, economic development, homelessness, transportation, and fair housing. Attendees identified the following needs: 1. The most common housing problem is cost. 2. The elderly /low income and those with special needs or health issues. 3. Many persons with limited English proficiency are unaware or unable to access services and help. 4. The Hispanic population is often concentrated in manufactured housing/mobile homes; the same is true of very low-income elderly. 5. The larger unit with three or more bedrooms is most lacking. 6. Zoning and parking requirements impede large unit development. 7. Lee County generally has a good quality-housing product with various price points and locations. Low-income areas have a preponderance of substandard housing. 8. Zoning restrictions and parking requirements make it difficult to develop larger rental units. These are also more difficult to manage and maintain. Overcrowding of available 2 bedroom units is common. The lack of public transit and housing near employment nodes complicates the lifestyle of low-income households. Human and Veteran Services regularly consults with Community Development and the Affordable Housing Committee and plans to continue that partnership to meet community needs.</p>
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16	<p>Agency/Group/Organization</p> <p>Agency/Group/Organization Type</p> <p>What section of the Plan was addressed by Consultation?</p> <p>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</p>	<p>Southwest Florida Community Foundation</p> <p>Regional organization Planning organization Foundation</p> <p>Housing Need Assessment Public Housing Needs Homelessness Strategy Non-Homeless Special Needs Economic Development Market Analysis Anti-poverty Strategy</p> <p>A representative from the Community Foundation was present at the February 7, 2019 Community Conversation meeting. Conversation was held regarding needs in the areas of housing, economic development, homelessness, seniors, individuals with disabilities, veterans, adults, youth, transportation, fair housing, and public facilities. Additional consultation regarding economic development, broadband technology and climate change was provided via e-mail. The Foundation provided the Workforce Now report and other FutureMakers reports for reference in this plan.</p>
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17	Agency/Group/Organization	Southwest Florida Workforce Development Board, Inc.
	Agency/Group/Organization Type	Services-Employment Regional organization Planning organization Business Leaders
	What section of the Plan was addressed by Consultation?	Economic Development Market Analysis Anti-poverty Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Consultation regarding economic development, the job market, and the workforce was provided via e-mail on March 11, 2019. The Board provided data, narratives and reports for referenced in this plan.
18	Agency/Group/Organization	Lee County Economic Development
	Agency/Group/Organization Type	Other government - Local Grantee Department
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Economic Development Anti-poverty Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	The Lee County Economic Development office (EDO) was unable to attend the Local Government Consultation meeting, but provided input via e-mail on May 1, 2019. The EDO provided input regarding existing economic development (ED) initiatives that are currently in progress, as well as the office's plans and initiatives for opportunity zones. A an individual meeting was also help with the EDO on April 30, 2019 to discuss future collaboration with the office, and housing and ED needs in the North Fort Myers target area. The EDO and Human and Veteran Services intend to coordinate efforts in the target area whenever feasible to ensure comprehensive revitalization.

19	Agency/Group/Organization	Lee County Public Safety - Emergency Management
	Agency/Group/Organization Type	Other government - Local Grantee Department
	What section of the Plan was addressed by Consultation?	Non-Homeless Special Needs Market Analysis Hazard Resilience
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	The Lee County Public Safety Emergency Management team was unable to attend the Local Government Consultation meeting, but provided input via e-mail on May 2, 2019. The department discussed the local mitigation strategy and other efforts to ensure hazard resilience among all Lee County residence, especially those who are low- and moderate-income. Human and Veteran Services regularly coordinates with Emergency Management to ensure educational sessions and materials are made available to staff and clients. HVS also worked closely with Emergency Management in the response to and recovery from Hurricane Irma in 2017.

20	Agency/Group/Organization	School District of Lee County
	Agency/Group/Organization Type	Services-Children Publicly Funded Institution/System of Care Other government - Local Major Employer
	What section of the Plan was addressed by Consultation?	Market Analysis Anti-poverty Strategy Broadband Connections
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	The Lee County School District was unable to attend the Local Government Consultation meeting, but provided input via e-mail on May 3, 2019. The district provided input regarding student's access to broadband and technology. Human and Veteran Services also coordinates with the school district's project access team, which provides services to families experiencing homelessness in Lee County. The district provided input for the CoC Strategic plan, and will continue partnership with the CoC.

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

Additional parties invited to participate in the planning process included: Charlotte County, Collier County, and the Town of Fort Myers Beach. These jurisdictions were invited to attend the February 13, 2019 Local Government Consultation Meeting via e-mail. The Town of Fort Myers Beach was also invited to participate in a Community Conversation meeting held on the Beach.

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

Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
Continuum of Care	Lee County Human and Veteran Services	The Lee County Continuum of Care implemented a new Strategic Plan in April 2019.
Analysis of Impediments to Fair Housing	Lee County Human and Veteran Services	Lee County, in collaboration with the City of Fort Myers, City of Cape Coral, has completed the 2019-2023 Regional Analysis of Impediments to Fair Housing Choice (AI). The completed AI will be submitted to HUD prior to August 16, 2019, and will be available for review at: https://www.leegov.com/dhs/fairhousing .
Community Strategic Plan	Lee County Human and Veteran Services	The Community Strategic Plan, as required by the Florida Department of Economic Opportunity (DEO) as a condition of the receipt of Community Services Block Grant (CSBG) funds, was completed in tandem with the 2019-2023 Consolidated Plan.

Table 3 – Other local / regional / federal planning efforts

Describe cooperation and coordination with other public entities, including the State and any adjacent units of general local government, in the implementation of the Consolidated Plan (91.215(I))

Cooperation and coordination in the implementation of the Consolidated Plan was attempted through the development of community conversation and the local government consultation meetings. Although complete representation was not fully achieved, significant input was received regarding community needs.

In an effort to better coordinate planning efforts, Lee County Human and Veteran Services (HVS) solicited public input on the Community Strategic Plan and Homeless Strategic Plan, which are required for the receipt of Community Services Block Grant (CSBG) and Continuum of Care (CoC) funding, during the public participation for the 2019-2023 Consolidated Planning Process. HVS believes that the combination of these efforts will lead to more effective and targeted programs, and reduce duplication of services.

PR-15 Citizen Participation

1. Summary of citizen participation process/Efforts made to broaden citizen participation Summarize citizen participation process and how it impacted goal-setting

Public input was solicited through a series of eight Community Conversation meetings. These meetings were held in various areas of the County in the evening, in an effort to broaden participation, and allow for working residents to attend. The meetings were noticed in the local newspaper, published on social media, and advertised through flyers distributed via email and by area service providers.

During the meetings, attendees were provided an overview of the Consolidated Planning process, and information regarding current programs and funding. A list of community needs was reviewed and ranked by most attendees. The meetings also provided attendees the opportunity to discuss the needs and assets in their community. These discussions provided valuable information for the development of this plan. The results of the ranking and other input are summarized here within, and provided the framework for setting goals and selecting the projects detailed in this plan.

*The draft plan is available for a 30-day public comment period from June 28, 2019 to July 29, 2019.
All comments will be considered in preparing the final report submitted to HUD.*

	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons
1	Public Meeting	Non-targeted/broad community	In accordance with 24 CFR Part 91, a public meeting was advertised and held on November 15, 2018, where comment was solicited on the development of the 2019-2023 Consolidated Plan and 2019 Annual Action Plan. The meeting took place at the Community Action Agency/Neighborhood District Committee (CAA/NDC) meeting, where 18 people attended, not including grantee staff. The group was provided an overview of the 2019-2023 Consolidated Plan and 2019 Annual Planning process. Attendees also reviewed and ranked a list of community needs.	Suggestions were made to consider implementing rideshare programs, non-profit and faith based transportation networks, and car repair programs for low-income households as a means to lower transportation costs. Additional discussion was held regarding providing employment opportunities for non-violent felons, facade and building rehabilitations for small businesses, and the need for low cost housing developed by non-profit organizations.	All comments were accepted and considered during the development of the 2019-2023 Consolidated Plan and 2019 Annual Action Plan.
2	Public Meeting	Non-targeted/broad community	In accordance with 24 CFR Part 91, a public meeting was advertised and held on December 4, 2018, where comment was solicited on the development of the 2019-2023 Consolidated Plan and 2019 Annual Action Plan. The meeting took place at the Sanibel Captiva Community Bank, where 9 people attended, including representatives from the City of Sanibel. The group was provided an overview of the 2019-2023 Consolidated Plan and 2019 Annual Planning process. Attendees also reviewed and ranked a list of community needs.	Varieties of needs on Sanibel were discussed. The group identified a significant need to support affordable housing, primarily the preservation and development of rental housing. Secondly, needs for workforce transportation were identified, as many employees on the island commute long distances. Discussion regarding fair housing practices on the island revealed that there are limited instances of discrimination, but attendees voiced the importance of having multilingual staff to ensure persons with limited English proficiency have access to services. Comments regarding services for youth and adults indicated a need for increased mental health and substance abuse treatment and substance abuse prevention programs for youth.	All comments were accepted and considered during the development of the 2019-2023 Consolidated Plan and 2019 Annual Action Plan.

3	Public Meeting	<p>Non-targeted/broad community</p> <p>Low-and Moderate-Income Area</p>	<p>In accordance with 24 CFR Part 91, a public meeting was advertised and held on December 10, 2018, where comment was solicited on the development of the 2019-2023 Consolidated Plan and 2019 Annual Action Plan. The meeting took place at the Pine Manor Community Center, where four people attended. The group was provided an overview of the 2019-2023 Consolidated Plan and 2019 Annual Planning process. Attendees also reviewed and ranked a list of community needs.</p>	<p>Conversation was held regarding needs in the areas of housing, economic development, homelessness, seniors, individuals with disabilities, veterans, adults, youth, fair housing, and public facilities. Discussion was held regarding the following areas: Homelessness - attendees noted that there are a large number of homeless individuals that visit the community center seeking assistance. There was also a large camp behind a commercial building near the back of the neighborhood, but it is no longer there. Housing - Attendees discussed the housing affordability in both Pine Manor and Harlem Heights, and mentioned that the housing costs have gone up, but are still affordable in comparison to other areas of the County. Attendees also mentioned the large number of renters present in Pine Manor, and that was a factor in other community issues, such as the crime and lack of community engagement. Attendees mentioned difficulty for felons and people with evictions to find housing. Fair Housing - attendees mentioned that 20% of the Pine Manor population is Haitian, there is also a large concentration of Hispanic individuals. Attendees discussed that some property owners refer Black and Hispanic populations to different rental units. One resident of Harlem Heights mentioned that there is sometime discrimination based on source of income. Economic Development - residents mentioned the need for a laundromat in or near Pine Manor, as some residents do not have vehicles and the nearest laundromat is very far away. Public Facilities - attendees mentioned the need for speed bumps and speed controls within the neighborhood for safety, especially on 10th Ave and Oak Drive. Other needs - Pine Manor residents discussed the need for more community engagement and a sense of community. Harlem residents mentioned the desire for a community garden.</p>	<p>All comments were accepted and considered during the development of the 2019-2023 Consolidated Plan and 2019 Annual Action Plan.</p>
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4	Public Meeting	Non-targeted/broad community	<p>In accordance with 24 CFR Part 91, a public meeting was advertised and held on January 16, 2019, where comment was solicited on the development of the 2019-2023 Consolidated Plan and 2019 Annual Action Plan. The meeting took place at the Beacon of Hope on Pine Island, where fourteen people attended. The group was provided an overview of the 2019-2023 Consolidated Plan and 2019 Annual Planning process. Attendees also reviewed and ranked a list of community needs.</p>	<p>Conversation was held regarding needs in the areas of housing, economic development, homelessness, seniors, individuals with disabilities, veterans, adults, youth, transportation, fair housing, and public facilities. Attendees identified the following needs: Housing - Affordable rental units, rental assistance and down payment assistance programs are necessary on PI. Residents also highlighted the need for owner occupied housing rehab, especially for those individuals who own a mobile home (MH) but rent the land where the MH is located. There is a large minority concentration in Pink Citrus, which need MH rehab. There are also limited units for families with children. A MH park recently became 55+ forcing families with children to move to other areas. A resident reported that Pink Citrus MH Park is about 80% families with children. Homelessness - Attendees discussed the current barriers, such as lack of employment, criminal histories etc., that make it difficult for homeless individuals to gain housing. A discussion was held regarding housing first practices, and the residents in attendance advocated for housing first practices countywide. The attendees agreed that an emergency shelter or some emergency housing options, especially for single males and veterans, are necessary on or near PI. Attendees mentioned that additional outreach is needed to ensure that individuals experiencing homelessness are aware of programs. Economic Development - Attendees agreed that training for skilled trades employees should be prioritized. Additional comments also mentioned the provision of childcare training to provide for jobs and more childcare on the island. Large portions of residents on the island have felonies, often DUI and drug related charges, and have difficulty finding jobs on the island. Limited transportation also prohibits them being able to obtain employment off island. Youth - Attendees</p>	<p>All comments were accepted and considered during the development of the 2019-2023 Consolidated Plan and 2019 Annual Action Plan.</p>
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			<p>discussed the limited activities for youth on the island. Attendees suggested that the installation of a park and/or sports facilities on the North end of the island would provide a facility for youth activities and a safe place for children to go. One resident mentioned that kids currently play in the ponds behind the residential areas. Additional comments reflected a need for drug prevention, afterschool and summer programs. Food insecurity is also an issue for children in the summer. Substance Abuse/Mental Health/HealthCare - Attendees discussed the community health assets on PI, and mentioned that health care on the island is a lower need than other areas discussed. Substance abuse is common on the island, and most individuals with substance abuse and mental health issues are concentrated in low-income and high minority areas. Public Facilities-Some discussion was held about making sidewalks and buildings ADA compliant. One resident mentioned that it would be helpful for businesses on the island to receive education about ADA requirements. There is a need for adult day cares and assisted living facilities to assist the aging population on the island. Transportation is a substantial need on the island, as most residents do not have cars and/or licenses. Beacon of Hope conducted a survey of residents and will provide the results for use in the planning process. Fair Housing - Attendees mentioned that they do not know of any housing discrimination that is currently taking place on the island. Attendees mentioned that most all locations are pet friendly and open to service animals. A few areas are highly concentrated with minorities and low-income residents. Other needs - Attendees discussed the challenges for residents with felonies, poor credit, and no citizenship status in opening and maintaining a bank account.</p>	
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5	Public Meeting	Non-targeted/broad community	<p>In accordance with 24 CFR Part 91, a public meeting was advertised and held on January 23, 2019, where comment was solicited on the development of the 2019-2023 Consolidated Plan and 2019 Annual Action Plan. The meeting took place at Veteran's Park in Lehigh Acres, where four people attended. The group was provided an overview of the 2019-2023 Consolidated Plan and 2019 Annual Planning process. Attendees also reviewed and ranked a list of community needs.</p>	<p>Conversation was held regarding needs in the areas of housing, economic development, homelessness, seniors, individuals with disabilities, veterans, adults, youth, transportation, fair housing, and public facilities. Attendees identified the following needs: Housing - Attendees discussed the limited affordability of rental units. Economic Development - Attendees discussed the lack of employment opportunities in Lehigh, and emphasized the need for more skilled trade workers, especially those that work in Lehigh. One attendee mentioned that skilled trade workers often travel outside of Lehigh for work because they can make more money. Homelessness - Attendees discussed a large presence of chronically homeless individuals present in Lehigh and advocated for a cold weather shelter, possibly in partnership with local churches. Additionally, they emphasized the need for non-emergency medical services for the homeless in Lehigh, including prescriptions. The director of Lehigh Community Services estimated there were around 15 clients who were homeless. Mental Health/Substance Abuse - Attendees noted that there are a significant number of overdoses in Lehigh, and no MHSA programs that they knew of. Transportation - Affordable transportation is a large issue in Lehigh especially since many people work far away due to lack of job in Lehigh. Passport is also very expensive. Public Facilities - All attendees that lived in Lehigh noted that they loved living there and regularly used the parks and recreational facilities there were available. One attendee noted the need to streetlights along sidewalks.</p>	<p>All comments were accepted and considered during the development of the 2019-2023 Consolidated Plan and 2019 Annual Action Plan.</p>
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6	Public Meeting	Non-targeted/broad community	<p>In accordance with 24 CFR Part 91, a public meeting was advertised and held on February 7, 2019, where comment was solicited on the development of the 2019-2023 Consolidated Plan and 2019 Annual Action Plan. The meeting took place at Liles Hotel in Bonita Springs, where four people attended. The group was provided an overview of the 2019-2023 Consolidated Plan and 2019 Annual Planning process. Attendees also reviewed and ranked a list of community needs.</p>	<p>Conversation was held regarding needs in the areas of housing, economic development, homelessness, seniors, individuals with disabilities, veterans, adults, youth, transportation, fair housing, and public facilities. Attendees identified the following needs: Housing - Attendees discussed the need for housing at length, some key points include providing incentives and for low-income housing development (including mandating affordable housing in zoning by requiring a # of affordable housing units for every x# of market rate units), building relationships with developers, tiny house development, affordable townhomes/condos, and creating shared housing units. Economic Development - Attendees emphasized the need for skilled trade job training and stated that there was a large gap in the need vs. supply of workers. A representative from the SWFL Community Foundation discussed the future maker's coalition, which is making strides to educate youth and adults in all fields. Additionally, the group recognized a need to provide education to students regarding scholarships available for technical/vocational schools. The group discussed the need for facade improvements in Tice and along MLK, and potential ways to prevent gentrification if economic development occurs in those two areas. One attendee suggested research into grandfathering taxes for those who what lived in those areas for many years. Homelessness - The group discussed the need for Emergency Shelter beds, and other homeless services in Bonita or South Fort Myers. One attendee noted there are several homeless students at FGCU, and limited resources for them near campus. One attendee had feedback regarding</p>	<p>All comments were accepted and considered during the development of the 2019-2023 Consolidated Plan and 2019 Annual Action Plan.</p>
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	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons
				<p>the 2019 Point in Time Count, and stated that persons living on the street were not sure where to go to get counted. One member suggested creating more peer based street outreach to engage those living in the woods. Seniors - The group emphasized the need to engage seniors in fraud protection classes, and the need for transportation, in-home healthcare, and adult day cares for seniors. The group discussed the implementation of multi-generational housing/communities to assist the elderly and families with children. One attendee also advocated for shared housing and co-located services for veterans. Youth - The group discussed the need for affordable childcare when schools are closed, but parents still have to go to work. Fair Housing - The group discussed the need for affordable housing in high opportunity areas. The group also mentioned there is resistance (NIMBY) to a variety of service agencies who are attempting to build in high opportunity areas. Public Facilities - One attendee mentioned the Pine Manor Community Garden needed improvement. The group agreed that sidewalks in San Carlos Park are necessary for safety. The group also discussed funds available for non-profit capital improvement.</p>	

	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons
7	Public Meeting	Non-targeted/broad community	In accordance with 24 CFR Part 91, a public meeting was advertised and held on February 25, 2019, where comment was solicited on the development of the 2019-2023 Consolidated Plan and 2019 Annual Action Plan. The meeting took place at Chapel by the Sea in Fort Myers Beach, where 4 people attended. The group was provided an overview of the 2019-2023 Consolidated Plan and 2019 Annual Planning process. Attendees also reviewed and ranked a list of community needs.	Conversation was held regarding needs in the areas of housing, economic development, homelessness, seniors, individuals with disabilities, veterans, adults, youth, transportation, fair housing, and public facilities. Attendees identified the following needs: Housing: Attendees discussed the need for housing at length; some key points include the lack of year round affordable rentals on the beach. The group advocated for shared housing, and improving access to housing for seniors. Transportation: The group discussed inefficient bus routes and limited connects to and from the beach. Economic Development: The group discussed the need for additional skilled trades and concerns over the aging workforce. Homelessness: The group discussed the need for Emergency Shelter beds, and other homeless services, especially mental health services on the Beach. Special Needs Populations: There are a large number of Veterans that seek food and services on the Beach. Many units on the beach are not accessible, and there are limited social activities for elderly. There are a large number of AA and NA programs on the Beach. Public Facilities: The group discussed the need for turtle safe lighting along Estero Blvd., and increased bike safety.	All comments were accepted and considered during the development of the 2019-2023 Consolidated Plan and 2019 Annual Action Plan.

	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons
8	Public Meeting	Non-targeted/broad community	In accordance with 24 CFR Part 91, a public meeting was advertised and held on March 14, 2019, where comment was solicited on the development of the 2019-2023 Consolidated Plan and 2019 Annual Action Plan. The meeting took place at the Community Action Agency/Neighborhood District Committee (CAA/NDC) meeting, where 12 committee members and ten members of the public attended, not including grantee staff. The group was provided an overview of the 2019-2023 Consolidated Plan and 2019 Annual Planning process. Attendees also reviewed and ranked a list of community needs.	Comments were made regarding the need for affordable housing for seniors and persons with disabilities.	All comments were accepted and considered during the development of the 2019-2023 Consolidated Plan and 2019 Annual Action Plan.

Table 4 – Citizen Participation Outreach

Needs Assessment

NA-05 Overview

The needs assessment has been completed using data, public input, agency and stakeholder input, and staff recommendation. The needs identified are mostly consistent with past needs, and including more affordable housing units for households with income at or below 80 percent of the area median income. Affordable housing units may be either rental or owner occupied, but making the units available at an affordable rate is the greatest present need. Projects outlined in this plan aim to address this need through the development of affordable housing units by non-profit providers, and through the rehabilitation of existing units. Over the next five years, these needs will be consistently re-evaluated to determine if the projects outlined in this plan are meeting community need, and should be continued. Adjustments to the plan will be made as necessary to ensure successful outcomes.

NA-10 Housing Needs Assessment - 24 CFR 91.205 (a,b,c)

Summary of Housing Needs

The data presented in the next several sections provides a description of the County's households, both in terms of demographics and in their housing related problems. This data, combined with citizen participation, agency and stakeholder consultation and staff recommendation, has helped to determine the overall needs for housing in Lee County.

Demographics	Base Year: 2000	Most Recent Year: 2017	% Change
Population	618,754	663,675	7%
Households	243,989	252,287	3%
Median Income	\$50,362.00	\$48,537.00	-4%

Table 5 - Housing Needs Assessment Demographics

Alternate Data Source Name:

American Community Survey 2011-2015

2011-2015 American Community Survey (ACS) DataTABLES: B01003(Population), S1101(Households),

Data Source Comments: DP03(Income)

Number of Households Table

	0-30% HAMFI	>30-50% HAMFI	>50-80% HAMFI	>80-100% HAMFI	>100% HAMFI
Total Households	25,305	28,320	44,685	25,620	128,350
Small Family Households	7,490	7,820	13,040	8,360	47,345
Large Family Households	1,685	2,045	3,045	1,615	5,835
Household contains at least one person 62-74 years of age	5,880	7,510	11,920	7,820	45,110
Household contains at least one person age 75 or older	3,770	7,270	10,335	4,800	19,515

	0-30% HAMFI	>30-50% HAMFI	>50-80% HAMFI	>80-100% HAMFI	>100% HAMFI
Households with one or more children 6 years old or younger	3,905	4,084	5,920	3,095	11,115

Table 6 - Total Households Table

Alternate Data Source Name:

2011-2015 CHAS

Data Source Comments: 2011-2015 CHAS DataTABLES: 1, 5, 7, and 13

Housing Needs Summary Tables

1. Housing Problems (Households with one of the listed needs)

	Renter					Owner				
	0-30% AMI	>30- 50% AMI	>50- 80% AMI	>80- 100% AMI	Total	0-30% AMI	>30- 50% AMI	>50- 80% AMI	>80- 100% AMI	Total
NUMBER OF HOUSEHOLDS										
Substandard Housing - Lacking complete plumbing or kitchen facilities	280	335	200	50	865	120	75	130	95	420
Severely Overcrowded - With >1.51 people per room (and complete kitchen and plumbing)	285	150	300	10	745	70	60	115	40	285
Overcrowded - With 1.01-1.5 people per room (and none of the above problems)	715	900	785	425	2,825	320	240	430	105	1,095
Housing cost burden greater than 50% of income (and none of the above problems)	8,425	5,625	1,920	235	16,205	6,965	5,890	4,850	1,840	19,545
Housing cost burden greater than 30% of income (and none of the above problems)	490	4,380	8,810	2,260	15,940	1,300	4,250	7,325	3,500	16,375
Zero/negative Income (and none of the above problems)	2,065	0	0	0	2,065	2,705	0	0	0	2,705

Table 7 – Housing Problems Table

Alternate Data Source Name:

2011-2015 CHAS

Data Source

Comments: 2011-2015 CHAS DataTABLES: 3 and 8

2. Housing Problems 2 (Households with one or more Severe Housing Problems: Lacks kitchen or complete plumbing, severe overcrowding, severe cost burden)

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
NUMBER OF HOUSEHOLDS										
Having 1 or more of four housing problems	10,195	11,390	12,015	2,980	36,580	8,770	10,515	1,280	5,580	26,145
Having none of four housing problems	915	1,395	5,360	5,710	13,380	1,070	5,020	14,460	11,350	31,900
Household has negative income, but none of the other housing problems	1,735	0	0	0	1,735	2,620	0	0	0	2,620

Table 8 – Housing Problems 2

Alternate Data Source Name:

2011-2015 CHAS

Data Source

Comments: 2011-2015 CHAS DataTABLES: 5

3. Cost Burden > 30%

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
NUMBER OF HOUSEHOLDS								
Small Related	145	2,265	4,210	6,620	465	665	1,845	2,975
Large Related	85	760	645	1,490	50	290	495	835
Elderly	270	995	1,705	2,970	720	3,015	4,130	7,865
Other	135	1,140	2,555	3,830	130	360	1,005	1,495
Total need by income	635	5,160	9,115	14,910	1,365	4,330	7,475	13,170

Table 9 – Cost Burden > 30%

Alternate Data Source Name:

2011-2015 CHAS

Data Source

Comments: 2011-2015 CHAS Data TABLES: 7

4. Cost Burden > 50%

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
NUMBER OF HOUSEHOLDS								
Small Related	3,675	2,395	555	6,625	1,710	1,285	1,145	4,140
Large Related	820	455	50	1,325	210	210	140	560
Elderly	1,660	1,770	655	4,085	3,550	3,870	2,870	10,290
Other	3,025	1,555	765	5,345	1,685	725	755	3,165

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
Total need by income	9,180	6,175	2,025	17,380	7,155	6,090	4,910	18,155

Table 10 – Cost Burden > 50%

Alternate Data Source Name:

2011-2015 CHAS

Data Source

Comments: 2011-2015 CHAS Data TABLES: 7

5. Crowding (More than one person per room)

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
NUMBER OF HOUSEHOLDS										
Single family households	669	693	654	204	2,220	224	164	322	85	795
Multiple, unrelated family households	34	45	235	30	344	55	10	109	8	182
Other, non-family households	0	0	55	40	95	0	0	10	4	14
Total need by income	703	738	944	274	2,659	279	174	441	97	991

Table 11 – Crowding Information – 1/2

Data 2011-2015 CHAS

Source:

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
Households with Children Present	2,965	3,104	3,725	9,794	940	980	2,195	4,115

Table 12 – Crowding Information – 2/2

Data Source

Comments: 2011-2015 CHAS Data TABLES: 13

Describe the number and type of single person households in need of housing assistance.

A gaps analysis completed by the Lee County Continuum of Care revealed that housing for single person households is the greatest need. It was determined that more than 100 permanent housing beds would be needed to meet the demand for individuals experiencing homelessness within the next 5 years.

Estimate the number and type of families in need of housing assistance who are disabled or victims of domestic violence, dating violence, sexual assault and stalking.

The local domestic violence service provider, Abuse Counseling and Treatment (ACT), provide 115 emergency shelter beds for persons who are fleeing domestic violence. In 2018, ACT estimated that approximately 390 households per year needed assistance to obtain permanent housing upon exit from the

emergency shelter. The CoC was recently awarded \$55,086, which will be used to rapidly re-house at least 10 households who are fleeing domestic violence. In addition, Lee County Human and Veteran Services (HVS) regularly receives referrals from ACT to provide assistance with move-in and housing location for households at the emergency shelter. In 2018, HVS served approximately 88 households, totaling 204 individuals, who self-identified as victims of domestic violence. Limited input regarding the needs for DV victims was receiving during the public consultation process.

A gaps analysis completed by the Lee County Continuum of Care revealed a need for 25 new permanent housing beds for persons who are medically vulnerable and/or have a disability to meet the need within the next 5 years. Disability data compiled from the 2013-2017 American Community Survey revealed 13.8% of Lee County's populations has a disability, and 28.6% of the population who is ages 65 or older is disabled. As indicated by census and CoC data, housing assistance is needed for persons who are 65 years of age or older and have a disability.

People with disabilities are in the midst of an increasingly acute affordable housing crisis. The National Low Income Housing Coalition's "Out of Reach 2018" reported that a person with a disability, whose sole source of income is Federal Social Security Income (SSI), can only afford a \$250 monthly rent payment. In 2017, the SSI program provided an individual with a monthly income of \$735 or \$8,820 a year. This amount is equal to only 16.9% of the area median income and 7.3% below the 2017 federal poverty level of \$12,060. This is approximately equal to an hourly wage of \$4.42 per hour – nearly four dollars below minimum wage, which is \$8.25 an hour. In 2018, HVS provided housing assistance to 797 individuals with disabilities, supporting a significant need for affordable and accessible housing.

Input from consultations with Lee County's Affordable Housing Committee, Local Government partners and residents confirms that Lee County's most common housing problem is cost burden. Comments also confirmed that housing costs were most problematic for persons who are low-income, elderly, and disabled.

What are the most common housing problems?

The most common housing problem reflected in the CHAS data is cost burden. HUD defines housing affordability in terms of the proportion of household income that is used to pay housing costs. Housing is "affordable" if no more than 30 percent of a household's monthly income is needed for rent, mortgage payments and utilities. When the proportion of household income needed to pay housing costs exceeds 30 percent, a household is considered "cost burdened." Severe cost burden is defined as when gross housing costs, including utilities, exceed 50 percent of the households' gross income. In the Lee County Region, nearly 50 percent of the renter-households and over 30 percent of owner-households are experiencing housing cost burden. More than 37,000 households in Lee County pay more than 50% of household income toward housing expenses. Of those, 43.3 percent are households making between 0-30% of the area median income.

Other housing problems, defined by HUD as lacking complete plumbing or kitchen facilities, overcrowded with more than 1.51 persons per room, or overcrowded with 1.01-1.5 persons per room affect far less households in Lee County. According to the 2013-2017 American Community Survey, 1.62

percent of the housing stock in Lee County did not have telephone service; 0.31 percent lacked complete plumbing facilities; and 0.53 percent housing units lacked complete kitchen facilities. CHAS data shows that only 6,235 households are affected by one of the three housing problems specified above, more than 30,000 less than those households affected by severe cost burden.

Input from consultations with Lee County's Affordable Housing Committee, Local Government partners and residents confirms that Lee County's most common housing problem is cost burden. Comments also confirmed that housing costs were most problematic for persons who are low-income, elderly, and disabled.

Are any populations/household types more affected than others by these problems?

Housing cost burden typically is increased for those with lower income. The lower the income, the larger percentage of a household's income is allotted to housing costs. Cost burden by low-income households tends to occur when housing costs increase faster than income. 43.3% of households who are severely cost burden have a household income between 0-30% of the area median income.

Age also affects a household's ability to afford housing. CHAS data indicates that 40.9% of all households who are severely cost burdened are elderly. Small-related households are the second most affected group, making up 30.2% of the total.

Input from consultations with Lee County's Affordable Housing Committee, Local Government partners and residents confirms that Lee County's most common housing problem is cost burden. Comments also confirmed that housing costs were most problematic for persons who are low-income, elderly, and disabled.

Describe the characteristics and needs of Low-income individuals and families with children (especially extremely low-income) who are currently housed but are at imminent risk of either residing in shelters or becoming unsheltered 91.205(c)/91.305(c)). Also discuss the needs of formerly homeless families and individuals who are receiving rapid re-housing assistance and are nearing the termination of that assistance

Economic or financial reasons were cited at the top causes for homelessness during the 2019 Point in Time count. With rising housing costs and a decreasing average median income (-4% since 2000), maintaining stable housing is difficult for many households. Individuals and families who are at risk of homelessness, especially those with extremely low-income, are most in need of monetary assistance to prevent homelessness. Between October 1, 2018 - April 31, 2019, Lee County Human and Veteran Services has expended more than 92% of its local homelessness prevention funds, indicating a significant need for financial assistance to ensure housing stability. Job loss, reduced work hours, loss of household income (i.e. partner leaves, decreased benefits), unexpected large expenses (car repair, medical emergency), and insufficient savings are all circumstances that can cause a low-income family to fall behind on their rent. In addition to insufficient income, families are often "doubled up." These families may be living with another family that is renting a unit and violating the terms on the lease, which puts them in jeopardy of losing their housing.

For those formerly homeless families and individuals who are receiving rapid re-housing assistance and are nearing the termination of that assistance, the greatest need is employment and affordable rental housing. Homeless Management Information System (HMIS) data indicates that only 54% of individuals and families who receive assistance through the CoC exit emergency shelter, transitional housing and rapid re-housing programs exited to a permanent housing destination in 2017. For formerly homeless individuals and families to maintain housing after rental assistance ends, the household must increase income and locate a housing unit within their range of affordability. Often tenants are able to increase income, but unable to locate an affordable rental unit, therefore returning the homelessness. In 2017, 15% of persons who exited from emergency shelter, transitional housing and rapid re-housing programs returned to homelessness within 6 months.

If a jurisdiction provides estimates of the at-risk population(s), it should also include a description of the operational definition of the at-risk group and the methodology used to generate the estimates:

Lee County does not currently provide estimates of the at-risk population(s). The CoC Strategic Plan includes a goal to gather and analyze data to identify risk factors for homelessness. Such data would likely include seasonal, racial, ethnic, industrial/occupational and geographic elements, and will be used to develop a local definition of "at risk".

Specify particular housing characteristics that have been linked with instability and an increased risk of homelessness

As previously stated, economic or financial reasons were cited at the top causes for homelessness during the 2019 Point in Time count. Job loss, reduced work hours, loss of household income (i.e. partner leaves, decreased benefits), unexpected large expenses (car repair, medical emergency), and insufficient savings are all circumstances that have been linked with housing instability and increased risk of homelessness. The CoC would like to identify other characteristics that increase risk of homelessness by regularly reviewing seasonal, racial, ethnic, industrial/occupational and geographic data.

NA-15 Disproportionately Greater Need: Housing Problems – 91.205 (b)(2)

In this section, disproportionately greater need exists when the percentage of persons in a category of need who are members of a particular racial or ethnic group is at least 10 percentage points higher than the percentage of persons in category as a whole. A summary of these findings is at the end of each section.

0%-30% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	18,965	1,985	4,355
White	11,275	1,365	3,395
Black / African American	2,370	205	425
Asian	205	30	0
American Indian, Alaska Native	120	4	35
Pacific Islander	0	0	0
Hispanic	4,780	320	500
0	0	0	0

Table 13 - Disproportionally Greater Need 0 - 30% AMI

Alternate Data Source Name:
2011-2015 CHAS

Data Source Comments: 2011-2015 CHAS Data Table: 1

*The four housing problems are:

1. Lacks complete kitchen facilities,
2. Lacks complete plumbing facilities,
3. More than one person per room,
4. Cost Burden greater than 30%

30%-50% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	21,905	6,415	0
White	15,050	4,955	0
Black / African American	1,930	470	0
Asian	250	59	0
American Indian, Alaska Native	45	0	0
Pacific Islander	0	0	0
Hispanic	4,460	875	0
0	0	0	0

Table 14 - Disproportionally Greater Need 30 - 50% AMI

Alternate Data Source Name:
2011-2015 CHAS

Data Source Comments: 2011-2015 CHAS Data Table: 1

*The four housing problems are:

1. Lacks complete kitchen facilities,
2. Lacks complete plumbing facilities,
3. More than one person per room,
4. Cost Burden greater than 30%

50%-80% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	24,865	19,820	0
White	17,865	15,300	0
Black / African American	2,225	1,260	0
Asian	455	135	0
American Indian, Alaska Native	4	15	0
Pacific Islander	0	0	0
Hispanic	4,190	2,875	0
0	0	0	0

Table 15 - Disproportionally Greater Need 50 - 80% AMI

Alternate Data Source Name:
2011-2015 CHAS

Data Source Comments: 2011-2015 CHAS DataTable: 1

*The four housing problems are:

1. Lacks complete kitchen facilities,
2. Lacks complete plumbing facilities,
3. More than one person per room,
4. Cost Burden greater than 30%

80%-100% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	8,560	17,060	0
White	6,725	13,175	0
Black / African American	570	1,070	0
Asian	185	135	0
American Indian, Alaska Native	30	30	0
Pacific Islander	0	0	0
Hispanic	975	2,460	0
0	0	0	0

Table 16 - Disproportionally Greater Need 80 - 100% AMI

Alternate Data Source Name:
2011-2015 CHAS

Data Source Comments: 2011-2015 CHAS Data Table: 1

*The four housing problems are:

1. Lacks complete kitchen facilities,
2. Lacks complete plumbing facilities,
3. More than one person per room,
4. Cost Burden greater than 30%

Discussion

For the 0-30 percent income group, Asian and Hispanic population groups have a disproportionate percent of households with one or more of the four housing problems. Asian households are over represented by more than 12 percent, and Hispanic households are over represented by 10.41 percent. 100 percent of American Indian and Alaskan Native households earning between 30 and 50 percent of the area median income have one or more of the four housing problems. This group is overrepresented in comparison to the whole by more than 22 percent. Asian households with an income between 50 and 80 percent of the area median income are overrepresented by 21.47 percent, when compared to the total percent of households with one or more of the four housing problems. Among households that earn between 80 and 100 percent of the area median income, Asian and American Indian, Alaskan Native households are overrepresented, when compared to the whole.

NA-20 Disproportionately Greater Need: Severe Housing Problems – 91.205 (b)(2)

In this section, disproportionately greater need exists when the percentage of persons in a category of need who are members of a particular racial or ethnic group is at least 10 percentage points higher than the percentage of persons in category as a whole. A summary of these findings is at the end of each section.

0%-30% of Area Median Income

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	17,180	3,770	4,355
White	10,260	2,380	3,395
Black / African American	2,035	540	425
Asian	205	30	0
American Indian, Alaska Native	105	19	35
Pacific Islander	0	0	0
Hispanic	4,380	725	500
0	0	0	0

Table 17 – Severe Housing Problems 0 - 30% AMI

Alternate Data Source Name:
2011-2015 CHAS

Data Source Comments: 2011-2015 CHAS Data Table: 2

*The four severe housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than 1.5 persons per room, 4. Cost Burden over 50%

30%-50% of Area Median Income

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	13,275	15,045	0
White	9,275	10,730	0
Black / African American	1,065	1,335	0
Asian	190	120	0
American Indian, Alaska Native	0	45	0
Pacific Islander	0	0	0
Hispanic	2,635	2,700	0
Other	0	0	0

Table 18 – Severe Housing Problems 30 - 50% AMI

Alternate Data Source Name:
2011-2015 CHAS

Data Source Comments: 2011-2015 CHAS Data Table: 2

*The four severe housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than 1.5 persons per room, 4. Cost Burden over 50%

50%-80% of Area Median Income

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	8,730	35,955	0
White	6,350	26,815	0
Black / African American	690	2,795	0
Asian	220	380	0
American Indian, Alaska Native	0	19	0
Pacific Islander	0	0	0
Hispanic	1,390	5,675	0
Other	0	0	0

Table 19 – Severe Housing Problems 50 - 80% AMI

Alternate Data Source Name:
2011-2015 CHAS

Data Source Comments: 2011-2015 CHAS Data Table: 2

*The four severe housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than 1.5 persons per room, 4. Cost Burden over 50%

80%-100% of Area Median Income

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	2,800	22,815	0
White	1,980	17,910	0
Black / African American	175	1,470	0
Asian	85	240	0
American Indian, Alaska Native	25	35	0
Pacific Islander	0	0	0
Hispanic	500	2,925	0
Other	0	0	0

Table 20 – Severe Housing Problems 80 - 100% AMI

Alternate Data Source Name:
2011-2015 CHAS

Data Source Comments: 2011-2015 CHAS Data Table: 2

*The four severe housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than 1.5 persons per room, 4. Cost Burden over 50%

Discussion

For the 0-30 percent income group, Asian and Hispanic population groups have a disproportionate percent of households with one or more of the four severe housing problems. Asian households are over represented by more than 19 percent, and Hispanic households are over represented by 10.25 percent. Asian households earning between 30 and 50 percent of the area median income have 14.4 percent more households with one or more of the four severe housing problems than the whole. The same is true for Asian households with an income between 50 and 80 percent of the area median income, who are overrepresented by 17.17 percent, when compared to the total percent of households with one or more of the four severe housing problems. Among households that earn between 80 and 100 percent of the area median income, Asian and American Indian, Alaskan Native households are overrepresented, when compared to the whole.

**NA-25 Disproportionately Greater Need: Housing Cost Burdens
91.205 (b)(2)**

In this section, disproportionately greater need exists when the percentage of persons in a category of need who are members of a particular racial or ethnic group is at least 10 percentage points higher than the percentage of persons in category as a whole. A summary of these findings is at the end of each section.

Housing Cost Burden

Housing Cost Burden	<=30%	30-50%	>50%	No / negative income (not computed)
Jurisdiction as a whole	161,570	45,655	40,275	4,775
White	107,245	34,055	29,110	3,580
Black / African American	7,670	3,715	3,200	485
Asian	625	585	665	0
American Indian, Alaska Native	275	70	130	35
Pacific Islander	15	0	0	0
Hispanic	16,880	6,990	6,805	675

Table 21 – Greater Need: Housing Cost Burdens AMI

Alternate Data Source Name:
2011-2015 CHAS

Data Source Comments: 2011-2015 CHAS Data Table: 9

Discussion

Throughout the public participation and consultation process for the development of this plan, housing cost burden was identified as a significant issue within the County. Input received suggested that Black/African American and Hispanic residents were most impacted by high housing costs. Data provided indicates that Asian households also experience severely high cost burden as a disproportionate rate, when compared to the whole. Over 35 percent of Asian households are severely cost burdened, while only 15.96 percent of the total population is severely cost burdened. Pacific Islanders experience the lowest cost burden, with 100 percent of those households have a lower than 30 percent housing cost burden.

NA-30 Disproportionately Greater Need: Discussion – 91.205(b)(2)**Are there any Income categories in which a racial or ethnic group has disproportionately greater need than the needs of that income category as a whole?**

Households with income below 50 percent of the area median income have the highest percent of households with one or more housing problems. In the areas examined, the greatest need is found among Asian and American Indian, Alaskan Native Populations. Input from Community Conversations and Local Government Consultations indicated that Hispanic and African American groups have disproportionately greater housing needs than other racial and ethnic groups.

If they have needs not identified above, what are those needs?

The data reported represents the areas of need.

Are any of those racial or ethnic groups located in specific areas or neighborhoods in your community?

The racial and ethnic groups identified in the CHAS data are represented throughout the County. A map showing the racial and ethnic concentrations in Lee County is provided in the attachments. Overall, Lee County has become more diverse since 2010, because of increases in racial and ethnic minority population and decreases in the percentage of White population. After White residents, the largest racial/ethnic group in Lee County is Hispanic.

The 2010 Census indicated a major shift in population composition from 2000, showing 70.96 percent White (not Hispanic) and Hispanic (any race) population comprising 18.31 percent of the County's total population. In 2017, 68.4 percent of the population identified as White (not Hispanic) and Hispanic (any race) populations comprised 20.2 percent of the County's total population. The County's population that is Hispanic or Latino increased from 113,308 persons to 141,544 persons from 2010 and 2017, an increase of 124.9 percent. The Cities of Bonita Springs, Cape Coral and Fort Myers have significant Hispanic concentrations, with 68.77 percent of the County's Hispanic population residing in these areas. The City of Sanibel has the lowest percent of Hispanic residents, at less than 1 percent. The largest concentration of Black population occurs in the City of Fort Myers with 26.17 percent of the City's population versus the countywide of 8.66 percent.

Input received from the City of Fort Myers confirmed that the largest proportion of African Americans reside in the City limits. Over 38 percent of all Lee County Blacks or African Americans live in the City of Fort Myers. Hispanics account for 21 percent of the City's population. Over 70 percent of the City's children and youth are either Hispanic or African American.

NA-35 Public Housing – 91.205(b)

Total Number of Public Housing Units and Vouchers in Use

	Program Type								
	Certificate	Mod-Rehab	Public Housing	Vouchers			Special Purpose Voucher		
				Total	Project - based	Tenant - based	Veterans Affairs Supportive Housing	Family Unification Program	Disabled *

Table 22 - Public Housing by Program Type

*includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition

Alternate Data Source Name:

2019 HACFM PHA Data

Characteristics of Residents

	Program Type								
	Certificate	Mod-Rehab	Public Housing	Vouchers			Special Purpose Voucher		
				Total	Project - based	Tenant - based	Veterans Affairs Supportive Housing	Family Unification Program	
									# Homeless at admission
# of Elderly Program Participants (>62)	0	0	331	578	22	471	85	0	
# of Disabled Families	0	0	119	6,274	26	533	68	0	
# of Families requesting accessibility features	0	0	786	2,079	11	1,970	70	22	
# of HIV/AIDS program participants	0	0	0	0	0	0	0	0	
# of DV victims	0	0	0	0	0	0	0	0	

Table 23 – Characteristics of Public Housing Residents by Program Type

Alternate Data Source Name:

2019 HACFM PHA Data

Race of Residents

Race	Certificate	Mod-Rehab	Public Housing	Program Type					
				Vouchers			Special Purpose Voucher		
				Total	Project - based	Tenant - based	Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
White	0	0	389	2,165	52	883	203	0	0
Black/African American	0	0	746	2,740	70	817	28	0	0
Asian	0	0	2	11	0	1	0	0	0
American Indian/Alaska Native	0	0	5	2	0	4	1	0	0
Pacific Islander	0	0	0	1	0	0	1	0	0
Other	0	0	0	0	0	0	0	0	0

***includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition**

Table 24 – Race of Public Housing Residents by Program Type

Alternate Data Source Name:
2019 HACFM PHA Data

Ethnicity of Residents

Ethnicity	Certificate	Mod-Rehab	Public Housing	Program Type					
				Vouchers			Special Purpose Voucher		
				Total	Project - based	Tenant - based	Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
Hispanic	0	0	218	1,446	111	1,308	27	0	0
Not Hispanic	0	0	921	3,282	268	2,719	295	0	0

***includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition**

Table 25 – Ethnicity of Public Housing Residents by Program Type

Alternate Data Source Name:
2019 HACFM PHA Data

Section 504 Needs Assessment: Describe the needs of public housing tenants and applicants on the waiting list for accessible units:

The PHA reported that most applicants do not answer questions regarding accessibility needs. The most common needs are basic handrails in the bathroom, ramps for the door and basic items that HACFM can provide quickly. There have only been two issues in the past 13 years, in which a resident requested accessible features that HACFM was unable to accommodate due to it creating hardship for the development. HACFM did recommend that the resident contact Builder's Care, a local non-profit agency, to get assistance. The accommodation was paid for and completed by Builder's Care.

Most immediate needs of residents of Public Housing and Housing Choice voucher holders

As of February 2019, there were 5,250 applications in the Section 8 (Housing Choice Voucher) waiting list. Those applicants consisted of families, elderly, and persons with disabilities, as well as other special populations. The waiting list for Public Housing had 2,784 applicants, 17 of which self-identified as disabled. Those on the waiting list, residents of public housing, and Housing Choice vouchers have immediate need for education, employment skills, transportation, financial literacy, and low-cost childcare.

How do these needs compare to the housing needs of the population at large

The needs of persons in public housing and housing choice voucher holders do not differ significantly from the population at large. Employment skills, transportation, and low-cost childcare were consistently identified as needs during the County's public participation process.

NA-40 Homeless Needs Assessment – 91.205(c)

Population	Estimate the # of persons experiencing homelessness on a given night		Estimate the # experiencing homelessness each year	Estimate the # becoming homeless each year	Estimate the # exiting homelessness each year	Estimate the # of days persons experience homelessness
	Sheltered	Unsheltered				
Persons in Households with Adult(s) and Child(ren)	34	300	927	1,538	64	56
Persons in Households with Only Children	0	11	0	0	0	785
Persons in Households with Only Adults	128	157	0	0	790	68
Chronically Homeless Individuals	79	31	0	0	0	0
Chronically Homeless Families	3	2	0	0	0	0
Veterans	14	11	0	0	97	116
Unaccompanied Child	7	17	0	0	70	71
Persons with HIV	2	3	0	0	0	0

Table 26 - Homeless Needs Assessment

Alternate Data Source Name:

2019 Homeless Point in Time Count

Estimated # of persons homeless from 2018 System Performance Measures
 Estimated # of first time homeless from 2018 System Performance Measures
 Estimated # Exiting from 2017-2018 Longitudinal Systems Analysis Submission in HUD HDX 2.0
 Estimated # of Days Homeless from 2017-2018 Longitudinal Systems Analysis

Data Source Comments:

Submission in HUD HDX 2.0

If data is not available for the categories "number of persons becoming and exiting homelessness each year," and "number of days that persons experience homelessness," describe these categories for each homeless population type (including chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth):

System Performance Measures, Longitudinal System Analysis and Point In Time Count reports were reviewed to gather data for the Homeless Needs Assessment. Some categories are not specified within those reports. Data for categories such as chronically homeless, persons with HIV, and unaccompanied youth has not been included.

Nature and Extent of Homelessness

Race:	Sheltered:	Unsheltered
White	293	107
Black or African American	169	50
Asian	1	1
American Indian or Alaska Native	1	2
Pacific Islander	1	1
Ethnicity:	Sheltered:	Unsheltered
Hispanic	101	4
Not Hispanic	367	158

Alternate Data Source Name:
2019 Homeless Point in Time Count

Estimate the number and type of families in need of housing assistance for families with children and the families of veterans.

The local family emergency shelter estimated their average monthly waiting list includes 82 households seeking emergency shelter. Of those, an average of 24 per month self-resolve, leaving a monthly bed deficit of 58. Lee County's Homeless Continuum of Care (CoC) is striving to improve system performance, particularly reducing the length of stay in emergency shelter, thereby freeing beds for other families. The CoC's family rapid-rehousing program received more than \$1.4 million annually through the HUD funding competition, and can house approximately 200 individuals annually.

Describe the Nature and Extent of Homelessness by Racial and Ethnic Group.

The 2019 point in time count indicated that 57.46% of persons who are homeless in Lee County are White. White persons represent 84.73% (2017 American Community Survey: Table B02001) of the total Lee County population; therefore, White persons are underrepresented in the homeless population.

The second highest race within the homeless population was Black/African American with more than 38%. Black/African American persons represent 8.66% (2017 American Community Survey: Table B02001) of the total Lee County population; therefore, Black/African American persons are over represented in the homeless population.

More than 12% of the persons counted identified as Hispanic or Latino. Hispanic or Latino persons represent more than 20% (2017 American Community Survey: Table B03003) of the total Lee County population, therefore Hispanic or Latino persons are underrepresented in the homeless population.

Describe the Nature and Extent of Unsheltered and Sheltered Homelessness.

There are more persons experiencing unsheltered homelessness due to availability of beds, particularly for households with single individuals. While the Point in Time and HMIS data included with this Plan may provide a clear picture of sheltered homelessness, the nature and extent of unsheltered homelessness is more difficult to define. The best resource is data obtained from Lee County's Outreach workers. Outreach staff at Lee Health, Lee County Human and Veteran Services, Community Assisted and Supported Living, and SalusCare engage persons experiencing unsheltered homelessness, and work to connect them to housing and supportive services. HMIS data from fiscal year 2018 (10/1/2017-9/30/2018) for the HVS outreach program revealed that 55 persons were engaged. Thirty-three of these were males and twenty-two females. Forty-six of the individual engaged were between the ages of 25 and 61, and 7 were over the age of 61. Two youth, ages 18 to 24, were also engaged by HVS outreach staff. Additionally, 14 individuals identified as Black or African American, 40 identified as White, 1 as multiple races, and 1 as Hispanic or Latino. Thirty-two of the persons engaged self-identified as having a behavioral health condition, and 11 self-identified as having a chronic health condition.

NA-45 Non-Homeless Special Needs Assessment - 91.205 (b,d)

Introduction

Non-homeless special needs can include, but are not limited to, supportive services for persons who are elderly and persons with disabilities, substance abuse prevention and treatment, and mental health services. Non-homeless special needs are typically identified by school personnel, caseworkers, or agency staff in direct contact with persons or households that need services but not housing. Many of their needs are addressed through specific funding sources for those services, and many of those services are provided at agencies specializing in those services. The County and agencies in the community work together to meet these needs as appropriate and as funding is available.

Describe the characteristics of special needs populations in your community:

The special needs populations in Lee County who are not homeless may include those with vision impairment, hearing impairment, who are elderly, who have a developmental disability, or who have a physical disability. Many area agencies either provide services in home or are made accessible to the special needs populations.

According to the Census 2013-2017 American Community Survey, 13.8 percent of the total civilian non-institutionalized Lee County population reported a range of disabilities. The elderly population has a significantly higher portion, 28.6 percent, of physical disabilities than other age groups. The most common type of disability among persons 18 to 64 years and 65 years and over was ambulatory, referring to difficulty moving from place to place that makes it impossible or impractical to walk as a means of transportation.

What are the housing and supportive service needs of these populations and how are these needs determined?

Accessible housing units and transportation for persons with disabilities can be identified as needs for these populations. More than 21 percent of all persons who are over the age of 18 reported having an ambulatory disability. Accessible housing and transportation ensure that these persons are able to live independently. Additionally, more than 28 percent of the total population over the age of 65 reported having a disability. As confirmed during public participation and consultation processes, there is a significant need for accessible housing and supportive services for elderly populations in Lee County.

Affordable housing units are also needed for these populations. People with disabilities are in the midst of an increasingly acute affordable housing crisis. The National Low Income Housing Coalition's "Out of Reach 2018" reported that a person with a disability, whose sole source of income is Federal Social Security Income (SSI), can only afford a \$250 monthly rent payment.

Discuss the size and characteristics of the population with HIV/AIDS and their families within the Eligible Metropolitan Statistical Area:

In 2017, the Florida Department of Health reported there were 2,318 persons living with HIV in Lee County. Of those, 989 individuals were white, non-Hispanic, and 852 individuals were black, non-Hispanic. There were 448 Hispanic persons who were HIV positive. There were 4 individuals under the age of 12, 50 between the ages of 20-24, 134 ages 25-29, 330 ages 30-39, 551 ages 40-49, 779 ages 50-59, and 460 individuals over the age of 60. To assist those living with HIV/AIDS, Lee County Human and Veteran Services administers the local HOPWA program through State of Florida funding. The local HOPWA program provides client advocacy and access to housing services via intensive case management. Income and transitional housing are cited as the immediate needs. As explained above, social security income is far below what is necessary to cover housing costs and meet other needs.

NA-50 Non-Housing Community Development Needs – 91.215 (f)**Describe the jurisdiction's need for Public Facilities:**

Each jurisdiction in Lee County has identified public facility needs, some of which will be addressed through City or County capital improvement programs, general funds, or other public allocations. Other, however, are found in low to moderate-income areas and are outside the scope of these other public facility planning efforts. These improvements may include neighborhood centers, senior centers, recreation facilities, multi-use paths or accessibility modifications to existing facilities.

How were these needs determined?

Public facility needs were discussed during the public participation and consultation processes undertaken for the completion of this plan. Discussions from these meetings revealed a need for additional multi-use paths and lighting in specific areas of the County, including the San Carlos Park and Suncoast neighborhoods. The City of Bonita Springs also voiced a need for additional multi-use paths and

recreational in their low- and moderate-income areas, as well as a need for improved storm water drainage facilities to prevent future flooding events. Other areas such as Bookelia, on Pine Island, and Fort Myers Beach discussed needs specific to their locations, including turtle-safe lighting and facilities, which are accessible without transportation.

Describe the jurisdiction's need for Public Improvements:

Public improvement needs exist countywide. Like public facilities, some improvements will be accomplished using other funds, not included in this Consolidated Planning process. Those improvements, which are not included outside of this process and are located in low- and moderate-income areas, will be addressed as needed, and as funding allows.

How were these needs determined?

Public facility needs were discussed during the public participation and consultation processes undertaken for the completion of this plan. Discussions from these meetings revealed a need for additional multi-use paths and lighting in specific areas of the County, including the San Carlos Park and Suncoast neighborhoods. The City of Bonita Springs also voiced a need for additional multi-use paths and recreational in their low- and moderate-income areas, as well as a need for improved storm water drainage facilities to prevent future flooding events. Other areas such as Bookelia, on Pine Island, and Fort Myers Beach discussed needs specific to their locations, including turtle-safe lighting and facilities, which are accessible without transportation.

Describe the jurisdiction's need for Public Services:

There are a number of public service needs throughout the County. Public services have been provided in Lee County's target neighborhoods and to specific populations for a number of years. The need for these services is anticipated to continue throughout the duration of this Consolidated Plan. Such services include, but are not limited to, after school and summer youth programs, health and medical services, transportation, employment related programs, senior services, food pantries, and services for persons experiencing homelessness.

How were these needs determined?

Public service needs were discussed during the public participation and consultation processes undertaken for the completion of this plan. Discussions from these meetings revealed a need for a variety of public services. Mental health and substance abuse programs are most needed throughout the County for all populations. Affordable childcare and youth programs provided during school breaks were also identified as a significant need during most meetings.

Housing Market Analysis

MA-05 Overview

Housing Market Analysis Overview:

The majority of Lee County's housing units are single family detached units.

Housing needs were discussed at length during the public participation and consultation processes undertaken for the completion of this plan. Discussions from these meetings revealed a need for a variety of housing units. Such units include those providing services and housing for elderly and disabled individuals. Participants also stated the need for shared and single room occupancy housing for persons experiencing homelessness, persons with severe and persistent mental illness, and persons with disabilities. Consultation with the Affordable Housing Committee, PHA, and City of Fort Myers, also revealed the need for large units to meet the housing needs of households with 5 or more members.

Affordable housing has been identified as the most significant need within the County.

MA-10 Number of Housing Units – 91.210(a)&(b)(2)

Introduction

Lee County's housing stock includes four categories: single-family dwelling units, multi-family dwelling units, mobile homes and other types of units. Single-family units are attached or detached dwelling units usually on individual lots of land. In 2017, single-family housing units comprised 62.23 percent. The City of Cape Coral had the highest proportion of single-family housing units in the County followed by unincorporated County areas and the Village of Estero.

Multi-family units consist of structures with two or more units. Multi-family dwelling units comprised 27.86 percent of the County's housing stock in 2017. The Town of Fort Myers Beach and the City of Fort Myers had higher proportions of multi-family units, while the City of Cape Coral and unincorporated County areas had higher proportion of single-family units.

Mobile homes or manufactured homes are typically located at mobile home parks in Lee County. Mobile-home units comprised 9.77 percent of the County's housing stock in 2017. Most of the County's 37,452 mobile homes are located in the unincorporated areas of the County followed by the City of Bonita Springs.

Single-family home sales rose steadily between 2012 and 2017. Since 2012, home values have steadily risen. According to Florida Realtors "Florida Residential Market Sales Activity Report, January 2019" median sales price in the Cape Coral - Fort Myers MSA for a single family home was \$264,498, an increase of more than \$69,000 from the 2014 median of \$195,000, and nearly the same amount as the 2004 median.

All residential properties by number of units

Property Type	Number	%
1-unit detached structure	199,628	53%
1-unit, attached structure	31,214	8%
2-4 units	25,268	7%
5-19 units	40,258	11%
20 or more units	38,186	10%
Mobile Home, boat, RV, van, etc	39,779	11%
Total	374,333	100%

Table 27 – Residential Properties by Unit Number

Alternate Data Source Name:

American Community Survey 2011-2015

Data Source Comments: Default 2011-2015 ACS DataTable: B52024

Unit Size by Tenure

	Owners		Renters	
	Number	%	Number	%
No bedroom	878	0%	2,129	4%
1 bedroom	9,178	7%	15,720	26%
2 bedrooms	94,722	68%	47,317	78%
3 or more bedrooms	179,711	125%	57,044	92%
Total	284,489	200%	122,210	200%

Table 28 – Unit Size by Tenure

Alternate Data Source Name:

American Community Survey 2011-2015

Data Source Comments: Default 2011-2015 ACS Data Table: B25042

Describe the number and targeting (income level/type of family served) of units assisted with federal, state, and local programs.

Lee County receives grants and entitlements from various funding sources, including Community Development Block Grant (CDBG), HOME Investment Partnership (HOME), State Housing Initiatives Partnership (SHIP), and others. CDBG funds are used to assist low- and moderate-income owner occupied households with housing rehabilitation, and to assist non-profit housing providers develop housing through acquisition and/or rehabilitation. Lee County expects between 30 and 45 households to receive assistance through owner occupied rehabilitation per year. Lee County also estimates that 105 of affordable housing units will be added because of assistance provided to non-profit housing providers. HOME funds are used to assist low- and moderate-income households through down-payment assistance, tenant based rental assistance, and through assistance provided to non-profit housing providers. Lee County expects between 18 and 35 households will receive down payment assistance annually. HOME Tenant Based rental assistance is estimated to provide long-term rental assistance to 26 households experiencing homelessness. SHIP funds are received by Lee County's Community Development Department, and are allocated annually to Human and Veteran Services. Currently, SHIP funds are used for down payment assistance and owner occupied rehabilitation. Human and Veteran Services pursues additional funding opportunities and partnerships to assist low- and moderate-income households whenever possible.

Provide an assessment of units expected to be lost from the affordable housing inventory for any reason, such as expiration of Section 8 contracts.

Data compiled by the Shimberg Center for Housing Studies at the University of Florida indicates that there are 6,272 assisted units in Lee County. One development, Sunrise Towers, subsidy will expire in May 2019. The expiration of this subsidy will result in the loss of 42 affordable housing units. The subsidy for an additional 502-assisted units is expected to expire between 2019 and 2023. Some private affordable housing units have also been lost due to the rise in economic and housing market conditions.

Does the availability of housing units meet the needs of the population?

Lee County Housing stock in 2017 totaled 383,244 total units. Lee County's population in 2017 totaled 698,468 persons. The 2013-2017 American Community survey estimates an average household's size per unit as 2.61 persons. The total housing demand for the population is therefore $698,468/2.61$, or about 267,612 housing units. (2017 American Community Survey)

The existing housing stock of 383,244 exceeds the current demand of 267,612 needed units by 115,632 units. This figure does not take into account unit availability, or unit affordability, which are discussed below.

American Community Survey Data estimates that 31% of the existing housing stock is vacant, or 118,805 vacant units and 264,345 occupied units. Of the 118,805 vacant units, 89,732 are listed as being for seasonal, recreational, or occasional use.

The demand based on population and average household size (267,612) exceeds the number of occupied units (264,345) by approximately 3,267 units. In 2017, 13,345 vacant units were available for sale or rent, or a gross surplus of 10,078 available units.

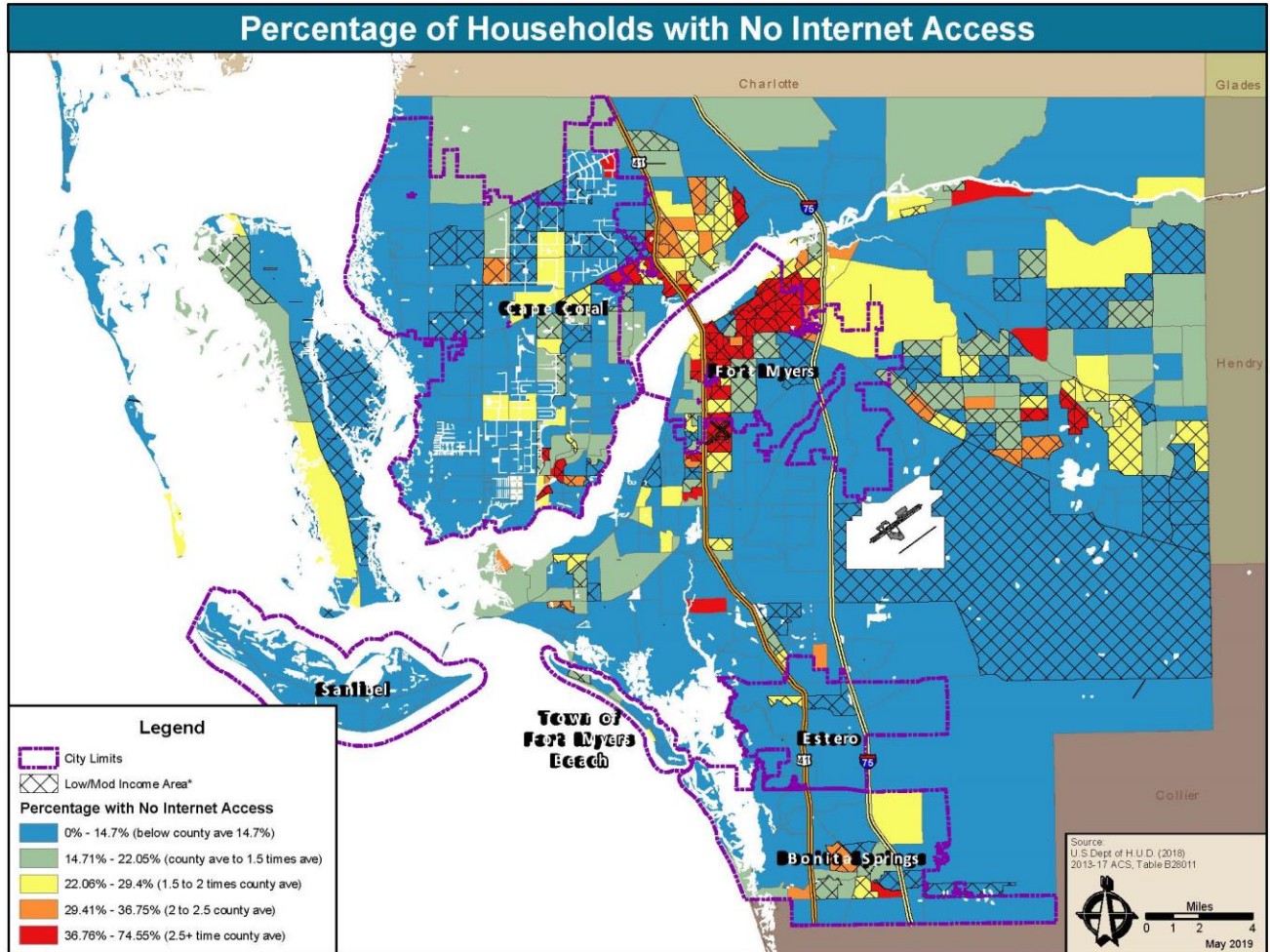
Describe the need for specific types of housing:

Housing needs were discussed at length during the public participation and consultation processes undertaken for the completion of this plan. Discussions from these meetings revealed a need for a variety of housing units. Such units include those providing services and housing for elderly and disabled individuals. Participants also stated the need for shared and single room occupancy housing for persons experiencing homelessness, persons with severe and persistent mental illness, and persons with disabilities. Consultation with the Affordable Housing Committee, PHA, and City of Fort Myers, also revealed the need for large units to meet the housing needs of households with 5 or more members.

Discussion

In addition to the overall number of units, it is also important to consider the number of housing units in Lee County that have access to broadband service. Access to internet is necessary to search and obtain jobs, attend school, apply for mainstream benefits, and access a variety of other services and information. Many low- and moderate-income households may have a limited ability to access internet due to cost and lack of service in their geographic area. Data provided by the National Telecommunications and Information Administration indicates that 100% of Lee County has access to at least two internet service providers. Statewide access to two providers is available in 99.99% of the geographic area, and nationwide access to two providers is available in 98.72% of geographic area. 2013-2017 American Community Survey data (Table S2801) estimates that 90% of the households in Lee County have one or more types of computing devices in the household. An estimated 9,069 households have access to a smart phone, but no other computing device. Approximately 80% of the households in Lee County have an internet subscription, 1.2% of those have a dial-up (non-broadband) connection. There are approximately 50,399 households, or 19.1% of households, without an internet subscription in Lee County. 40.6% of all the households without an internet subscription have a household income less than \$20,000 per year.

The Lee County School District currently has a partnership with Sprint to provide approximately 1,500 mobile hot spots for high school students who do not have access to Wi-Fi at home. Additionally, they collaborate with the Foundation of Lee County schools to provide donated laptops for families and students who may need them. The District has also implemented the Global Lee program. Global Lee incorporates 1:1 computing, modern collaboration tools, digital content, and new instructional strategies to provide teachers and students a state-of-the art set of tools to enhance learning. All 6th-12th grade students in traditional middle and high schools are issued a Chromebook for use at both school and home. The Chromebook is used with a variety of software and content throughout the school day. The District coordinates with Comcast to provide low-cost internet services for qualifying families. The Comcast Internet Essentials program is provided to families, who receive HUD housing assistance, are low-income veterans, low-income seniors, or who are eligible for National School Lunch Programs. The internet package costs \$9.95 per month, and provide in-home Wi-Fi access. Century Link is the second main Broadband provider in the Lee County area. Century Link's Lifeline program provides broadband access and voice services for \$9.25 per month to income-qualified households.



*Low/Mod Income Areas are areas that are 80% or less of the (AMI) Area Median Income

MA-15 Housing Market Analysis: Cost of Housing - 91.210(a)

Introduction

HUD provides annual Fair Market Rent (FMR) and affordability of rental housing in counties and cities in the U.S. In 2018 for the Cape Coral-Fort Myers MSA, the FMR for a two-bedroom unit was \$956. In order to afford this level of rent and utilities without paying more than 30 percent of income on housing, a household must earn \$3,186.67 monthly or \$38,240 annually. Assuming a 40-hour workweek, 52 weeks per year, this level of income translates into an hourly housing wage of \$18.38. In Lee County, a minimum-wage worker earned an hourly wage of \$8.25 in 2018. In order to afford the FMR for a two-bedroom unit, a minimum wage work must work 89 hours per week, 52 weeks per year. The National Low Income Housing Coalition’s “Out of Reach 2018”, report estimates that in Lee County, the mean hourly wage for the rent-household is \$8.83 and the affordable rent for mean renter is \$459 per month, which is well below the FMR for the region.

Cost of Housing

	Base Year: 2009	Most Recent Year: 2015	% Change
Median Home Value	222,700	157,400	(29%)
Median Contract Rent	818	790	(3%)

Table 29 – Cost of Housing

Data Source: 2005-2009 ACS (Base Year), 2011-2015 ACS (Most Recent Year)

Rent Paid	Number	%
Less than \$500	7,200	15.1%
\$500-999	38,344	62.8%
\$1,000-1,499	24,436	14.8%
\$1,500-1,999	4,874	3.5%
\$2,000 or more	3,271	3.8%
Total	78,125	100.0%

Table 30 - Rent Paid

Alternate Data Source Name:

American Community Survey 2011-2015

Data Source Comments: 2011-2015 ACS Data Table: B25063

Housing Affordability

% Units affordable to Households earning	Renter	Owner
30% HAMFI	200	No Data
50% HAMFI	3,020	1,370
80% HAMFI	4,250	670
100% HAMFI	No Data	2,260
Total	7,470	4,300

Table 31 – Housing Affordability

Alternate Data Source Name:

2011-2015 CHAS

Data Source Comments: 2011-2015 CHAS Data. Households is equal to the sum of renter and owner occupied units. Table: 14a & 14b - Only Vacant units included.

Monthly Rent

Monthly Rent (\$)	Efficiency (no bedroom)	1 Bedroom	2 Bedroom	3 Bedroom	4 Bedroom
Fair Market Rent	701	773	956	1,240	1,415
High HOME Rent	701	757	911	1,043	1,144
Low HOME Rent	557	597	717	828	923

Table 32 – Monthly Rent

Data Source: HUD FMR and HOME Rents

Is there sufficient housing for households at all income levels?

The 2018 median family income for the Cape Coral – Fort Myers MSA is \$63,700 (for a household with 4 persons). The maximum housing costs for households within various income ranges can be estimated based on the County’s median income and HUD’s standard that no more than 30% of a household’s income should be spent on housing costs. Families earning less than 30 percent of median income could only afford to pay \$627.50 toward housing costs. By contrast, families earning the median family income in the County could afford pay \$1,592.50 toward housing costs.

How is affordability of housing likely to change considering changes to home values and/or rents?

Between 2010 and 2017 the median housing value, median gross rent, and median household income decreased. The modest decrease in median housing value does not necessarily mean that housing is more affordable, because there was also a decrease in household income. Decreases in both income and home values leaves housing costs relatively high for residents in Lee County. Although sales prices have not yet reached boom time (2007) values, they continue to steadily rise, and are currently comparable to 2004 levels. The number of units renting for less than \$500 per month in Lee County declined by more than 65 percent between 2000 and 2017. Additionally, the units renting for between \$500 and \$750 decreased from 19,106 to 9,913, or 48 percent. At the same time, the units renting for more than \$1,000 per month increased from 7,374 units to 40,808 units, or 453.4 percent. (2013-2017 American Community Survey Table: B25063)

Housing supply plays an important part in housing affordability. The *Attainable Housing in Lee County: 2018* report completed by the Florida Housing Coalition indicates that there is a shortage of attainable housing in the County. More than 100,000 households are paying more than 30 percent of their income toward housing costs, and approximately half of those are paying more than 50 percent of their household income toward housing costs. The number of households who are paying more than 30 percent of their income toward housing costs is expected to increase in the next several years. The report estimates that by 2020, 39,629 households earning at or above 80 percent of the area median income will be housing cost burdened.

The age of housing is also an important factor in housing affordability. 2013-2017 American Community Survey data (Table: B25031) indicates that 246,132, or 64.23 percent, of all housing units in Lee County will be more than 20 years old in 2019. The large number of units which are reaching an age where home

repairs and improvements will become necessary is anticipated to further reduce the affordability of housing in the coming years.

How do HOME rents / Fair Market Rent compare to Area Median Rent? How might this impact your strategy to produce or preserve affordable housing?

American Community Survey data provides the median gross rent by bedrooms in Lee County in 2017 (Table B25031). The following is a comparison of the median gross rents (MGR) and Lee County's 2017 Fair Market Rent (FMR):

• <u>No Bedroom -</u>	<u>\$817 (MGR)</u>	<u>\$687 (FMR)</u>
• <u>1 Bedroom -</u>	<u>\$769 (MGR)</u>	<u>\$741 (FMR)</u>
• <u>2 Bedroom -</u>	<u>\$955 (MGR)</u>	<u>\$920 (FMR)</u>
• <u>3 Bedroom -</u>	<u>\$1,142 (MGR)</u>	<u>\$1,194 (FMR)</u>
• <u>4 Bedroom -</u>	<u>\$1,312 (MGR)</u>	<u>\$1,331 (FMR)</u>
• <u>5 or more bedrooms -</u>	<u>\$1,465 (MGR)</u>	<u>Not Reported</u>

For efficiency and 1-bedroom units FMR was lower than median gross rent. For units with two or more bedrooms the median gross rents were slightly lower than FMR, indicating that larger units are slightly more affordable in Lee County. Input received from the public participation process undertaken for the completion of this plan emphasized a need for shared and single room occupancy units, as well as units for singles, elderly, and persons with disability. This need is confirmed by the higher than FMR rate for efficiency and 1-bedroom units. To meet this need, efforts will be made to increase and preserve the number of affordable efficiency and 1-bedroom units.

Discussion

Housing needs were discussed at length during the public participation and consultation processes undertaken for the completion of this plan. Discussions from these meetings revealed a need for a variety of affordable housing units. Such units include those for elderly and disabled individuals. Participants also stated the need for shared and single room occupancy housing for persons experiencing homelessness, persons with severe and persistent mental illness, and persons with disabilities. Consultation with the Affordable Housing Committee, PHA, and City of Fort Myers, also revealed the need for large units to meet the housing needs of low-income households with five or more members. All meeting participants noted that affordable housing is a significant need within the County.

MA-20 Housing Market Analysis: Condition of Housing – 91.210(a)

Introduction

Housing stock age is frequently used as an indicator of housing condition. Most residential structures over 30 years of age will require minor repairs and modernization improvements, while units over 50 years in age are more likely to require major rehabilitation. According to the U. S. Census Bureau’s 2013-2017 American Community Survey, 24.64 percent of Lee County’s housing stock is over 30 years old. The high percentages of pre-1980 housing units are located in the older neighborhoods of the Town of Fort Myers Beach, City of Sanibel, and the City of Fort Myers. Cities of Bonita Springs and Cape Coral have relative newer housing stocks.

The age of housing is also an important factor in housing affordability. 2013-2017 American Community Survey data (Table: B25031) indicates that 246,132, or 64.23 percent, of all housing units in Lee County will be more than 20 years old in 2019. The large number of units, which are reaching an age where home repairs and improvements will become necessary, is anticipated to reduce the affordability of housing in the coming years.

Describe the jurisdiction's definition for substandard condition and substandard condition but suitable for rehabilitation:

Housing units are considered substandard if they are overcrowded, do not have heat, or lack complete kitchen or plumbing. American Community Survey data (Table B25123) indicates that 47.44 percent of all rental units have one of these problems, and 28.28 percent of owner occupied units have one of these problems.

Lee County considers Substandard Housing as housing that compromises the health, safety, or welfare of the occupants residing in the home due to certain physical attributes that does not conform to the test of structural soundness or, has contributing factors that exposes occupants to indecent, uninhabitable, living space and/or living conditions. Structural soundness is a three-part criterion that computes a weighted average based on the conditions of: a) the home foundation; b) bearing and exterior walls; and, c) the roof. A passing score of 70% is necessary to classify being structurally sound.

To be substandard but Suitable for Rehabilitation a home must pass the structural soundness test but can be deficient in other components such as inadequate heating/cooling, inefficient windows and doors; antiquated plumbing systems. When the deficiency of a condition that has caused substandard housing can be eliminated, removed, or corrected, a home termed of a “substandard condition but suitable for rehabilitation. Many more households live in units that border on the definition of substandard. These families live in homes that have extensive drywall damage, leaking roofs, broken windows, and unsecured doors.

To be considered for rehabilitation, all properties must be structurally sound as defined by the Florida Building code, cannot be condemned by the County, cannot exhibit excessive rehabilitation work without proper permits, and cannot have excessive termite infestation or mold damage.

Condition of Units

Condition of Units	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
With one selected Condition	49,257	28%	37,061	47%
With two selected Conditions	1,053	1%	2,840	4%
With three selected Conditions	98	0%	142	0%
With four selected Conditions	0	0%	17	0%
No selected Conditions	123,754	71%	38,065	49%
Total	174,162	100%	78,125	100%

Table 33 - Condition of Units

Alternate Data Source Name:
American Community Survey 2011-2015
Data Source Comments: 2011-2015 ACS Data Table: B25123

Year Unit Built

Year Unit Built	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
2000 or later	61,000	35%	30,138	39%
1980-1999	71,014	41%	26,755	34%
1950-1979	40,097	23%	19,544	25%
Before 1950	2,051	1%	1,688	2%
Total	174,162	100%	78,125	100%

Table 34 – Year Unit Built

Alternate Data Source Name:
American Community Survey 2011-2015
Data Source Comments: 2011-2015 ACS Data Table: B25036

Risk of Lead-Based Paint Hazard

Risk of Lead-Based Paint Hazard	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
Total Number of Units Built Before 1980	42,148	24%	21,232	27%
Housing Units build before 1980 with children present	2,750	2%	3,624	5%

Table 35 – Risk of Lead-Based Paint

Alternate Data Source Name:
2011-2015 CHAS
Data Source Comments: 2011-2015 CHAS Data Table: 13

Vacant Units

	Suitable for Rehabilitation	Not Suitable for Rehabilitation	Total
Vacant Units	122,046	0	122,046
Abandoned Vacant Units	87	0	87
REO Properties	116	0	116
Abandoned REO Properties	85	0	85

Table 36 - Vacant Units

Alternate Data Source Name:
American Community Survey 2011-2015
Data Source Comments: Vacant units reported in 2011-2015 ACS Data Table: B25004. REO and Vacant units reported from 2018 Data provided by Lee County Lands

Need for Owner and Rental Rehabilitation

The number of housing units that will become 20 years old or more in 2019 and the percent of housing units with at least one housing problem demonstrate the need for rehabilitation. Lee County plans to continue the owner occupied housing rehabilitation program, and may consider rental rehabilitation as needs change throughout this plan cycle.

Lee County Lands provided data regarding real estate owned and vacant properties as of February 2018. There are approximately 87 units on the public registry, which are listed as vacant or have evidence of vacancy, of those 85 units were real estate owned, and another 100 units, which were in pre-foreclosure status. Lee County assumes that many of the foreclosed and real estate owned properties are in need of rehabilitation to correct code violations and other deficiencies.

Estimated Number of Housing Units Occupied by Low or Moderate Income Families with LBP Hazards

2011-2015 CHAS data indicates that there are 63,380 units in Lee County which were built prior to 1979, of those 6374 units are occupied by families with children under the age of 6.

The Lee County Department of Health indicated that 49 children tested with elevated blood lead levels. In 2017 the state lowered the threshold for the definition of elevated blood lead levels, from 10 µg/dL to 5 µg/dL, following national recommendations from the CDC. This data change causes the number of cases to appear higher in 2017, but the change in metrics prevents comparison to years prior to 2017. In 2017, 7.0 tests were positive. This is an indicator that lead based paint related problems in Lee County are minor in comparison to other areas, which have older housing stock.

Lee County will continue to ensure that Lead Based Paint protocols are followed, as required by 24 CFR Part 35. For homes built prior to 1978, a LBP inspection and clearance report conducted by an EPA certified inspector or risk assessor indicating a lead-based paint hazard free home is required. Lead-Based Paint Notification shall include: The Lead Hazard Information Pamphlet; Appropriate LBP Disclosure Form; Notice of Lead Hazard Evaluation; and notice of the results of any Lead Hazard Reduction Activities conducted on the property. HUD Lead Based Paint Guidelines are issued pursuant to Section 1017 of the residential Lead-Based Paint Hazard Reduction Act of 1992, which is often referred to as Title X (“Title Ten”) because it was enacted as Title X of the Housing and Community Development Act of 1992 (Public Law 102-550). The Guidelines are based on the concepts, definitions and requirements set forth by Congress in Title X.

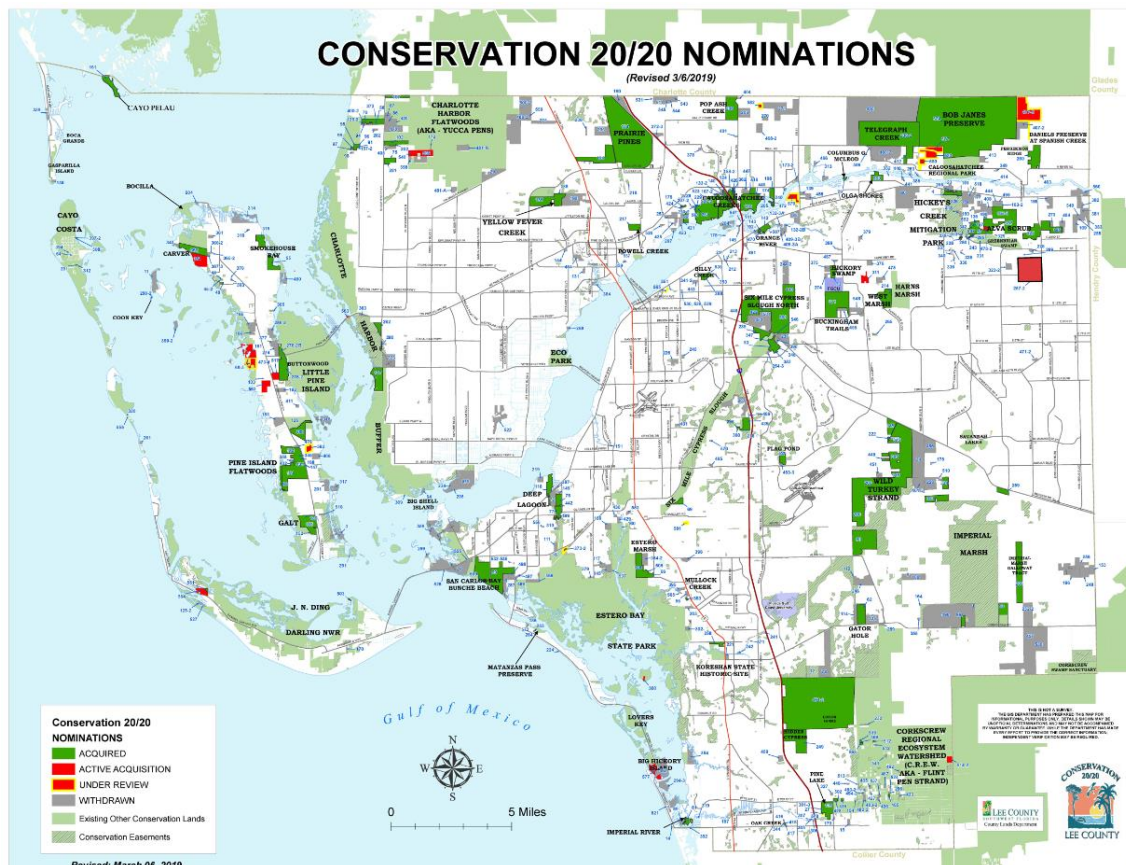
Discussion

In addition to those previously discussed, resiliency is also an important factor to consider when addressing the housing needs of low- and moderate- income persons in Lee County. Being in a high hazard area, with annual threats of hurricanes and flooding, Lee County has implemented several initiatives to reduce the risk of potential damage to housing units from natural hazards. Lee County participates in the National Flood Insurance Program, which requires that any structure located in the

Special Flood Hazard area (Flood Zones A and V), where the cost of proposed improvements or repairs equals or exceeds 50% of the value of the structure, must be brought into full compliance with current Flood Insurance Rate Map Requirements. These laws are required by the National Flood Insurance Program to protect lives and investment from future flood damages. In addition, Lee County requires that the calculation for the value of the improvements or repairs must include all permits obtained in the past five (5) years.

The Lee County Emergency Management team dedicates significant resources toward education property owners about the potential risks associated with natural and manmade disaster and how to prepare for such hazards. An "All Hazards Guide" is published annually and distribute across the County, including at community centers in the low- and moderate-income target areas identified in this plan. In addition, Emergency Management staff provide ongoing Hurricane Preparedness Seminars that are open to the public. The free seminars include information on how to prepare families and homes for hurricane season, how to use new hurricane-related technology and how Emergency Management responds to hurricanes and other disasters.

Lee County also manage's Flow way Protection, Drainage Maintenance, and Open Space Preservation (Conservation 20/20) initiatives, which aim to protect and restore natural flow ways and open space to reduce flood hazards and maintain eco system quality. A map of land acquired for conservation is attached to this plan. Conservation 20/20 manages 47 preserves spread throughout Lee County, within the boundaries of most cities, totaling nearly 30,000 acres. All preserves are open to the public for hiking, wildlife observation, and nature photography and study.



Finally, Lee County's mitigation planning efforts are centered on the Joint Unified Local Mitigation Strategy, also known as the LMS. The LMS is a comprehensive plan that is reviewed and approved every five (5) years by the Florida Division of Emergency Management (FDEM) and the Federal Emergency Management Agency (FEMA). The LMS includes a hazard and vulnerability assessment, mitigation goals and objectives for the community, and demographic information. It also includes a prioritized list of mitigation projects that can be funded by grant opportunities after declared disasters. Some examples of mitigation:

- Hurricane shutters for a home, business, or government building.
- Elevation of a flood vulnerable building or home.
- Drainage improvement projects.
- Road/bridge improvement projects.
- Creating wildfire buffers around development in vulnerable areas.
- Public information and outreach programs that educate the community on disaster risk, preparedness, and mitigation.

The LMS can be reviewed

here: http://www.leegov.com/publicsafety/Documents/Emergency%20Management/FINAL_LeeCounty_LMS2017.pdf

MA-25 Public and Assisted Housing – 91.210(b)

Both units and vouchers are in use in Lee County. Lee County currently has funding available for approximately 2200 vouchers. There are currently 5,250 applicants on the waiting list for Housing Choice Vouchers and 2,784 applicants on the waiting list for public housing. The need for public housing assistance far outweighs the supply, as demonstrated by the length of the waiting list. In addition, the number of available public housing units is decreasing as HUD introduces new programs such as Rental Assistance Demonstration and Choice Neighborhoods.

Totals Number of Units

	Program Type								
	Certificate	Mod-Rehab	Public Housing	Vouchers					
				Total	Project-based	Tenant-based	Special Purpose Voucher		
							Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
# of units vouchers available	0	0	882	2,216	150	1,704	322	0	40
*includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition									

Table 37 – Total Number of Units by Program Type

Alternate Data Source Name:
2019 HACFM PHA Data

Describe the number and physical condition of public housing units in the jurisdiction, including those that are participating in an approved Public Housing Agency Plan:

There are 882 public housing units. According to PHA, all of the properties are in very good condition.

Public Housing Condition

Public Housing Development	Average Inspection Score
Southward Village	74
Bonair Tower	90
Royal Palm	93
Horizons	90
The Landings	99
East Point Place	96
Renaissance (averages of senior and family phases)	82

Table 38 - Public Housing Condition

Describe the restoration and revitalization needs of public housing units in the jurisdiction:

HACFM intends to aggressively seek funding to replace or rehabilitate 570 public housing units within the City of Fort Myers and Lee County. Three projects are currently needed, but not budgeted. Those projects are: security enhancements for Southward Village, pipe rejuvenation for Royal Palm Towers, and enhanced security features to include a Police Substation at Horizons Public Housing Development.

Describe the public housing agency's strategy for improving the living environment of low- and moderate-income families residing in public housing:

HACFM has a homeownership program within the HCV program where the voucher can be used towards a mortgage. The FSS program in both its Public Housing and Housing Choice Voucher programs to encourage homeownership. HACFM has an elderly service coordinator who plans regular activities for senior residents. Additionally, the PHA's program encourages residents to participate in HUDs Earned Income Disallowance program, which allows the resident to have their earned income not counted towards rent to encourage homeownership. Residents are always encouraged to attend monthly resident meetings, which are held at all developments to provide input regarding improving living environments. Resident meetings are also held when new developments are being considered to gather input regarding amenities, such as outdoor activities for children, colors, floors etc.

MA-30 Homeless Facilities and Services – 91.210(c)

Introduction

A recently completed CoC Strategic Plan outlines the goals and objectives the CoC plans to carry out to ensure that homelessness in Lee County is a rare, brief, and one-time experience. The plan is based on the framework of the USICH Strategic Plan, *Home, Together*, and focuses largely on the provision of permanent housing and services necessary to maintain that housing.

Facilities and Housing Targeted to Homeless Households

	Emergency Shelter Beds		Transitional Housing Beds	Permanent Supportive Housing Beds	
	Year Round Beds (Current & New)	Voucher / Seasonal / Overflow Beds	Current & New	Current & New	Under Development
Households with Adult(s) and Child(ren)	120	132	4	357	0
Households with Only Adults	101	14	12	79	95
Chronically Homeless Households	0	0	0	0	0
Veterans	0	357	0	0	0
Unaccompanied Youth	10	0	0	0	0

Table 39 - Facilities and Housing Targeted to Homeless Households

Alternate Data Source Name:
2019 Housing Inventory Chart

Data Source Comments: Veteran Voucher data from Public Housing Authority as of April 2018

Describe mainstream services, such as health, mental health, and employment services to the extent those services are used to complement services targeted to homeless persons

The homeless housing and service providers within the CoC are required to coordinate with mainstream services. A primary function of case management is to make and coordinate referrals with community resources and mainstream services such as Food Stamps, Medicaid, Child Care, SSI/SSDI, Veteran’s Services, Section 8 Housing, mental health services, abuse services, etc. Staff from all funded agencies are required to make referrals and ensure clients access the referred services. Staff must also make necessary accommodations to ensure that clients needing additional assistance to utilize those services have the necessary resources. Client files from funded agencies are monitored to ensure that referrals and accommodations are appropriate, consistent, and timely.

List and describe services and facilities that meet the needs of homeless persons, particularly chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth. If the services and facilities are listed on screen SP-40 Institutional Delivery Structure or screen MA-35 Special Needs Facilities and Services, describe how these facilities and services specifically address the needs of these populations.

Facilities and services previously described, such as the HOPWA program, are available for persons experiencing homelessness, include those who are chronically homeless. In addition to these, the CoC has designed a homelessness response system, which aims to include all of the core components of a CoC. Locally these components include prevention, shelter, rapid re-housing, and permanent supportive housing. Prevention is provided through Lee County Human and Veteran Services and local non-profit organization, and is focused on ensure persons at risk of homelessness remain stably housed. Shelter is provided through the Bob Janes Triage Center and the Salvation Army family shelter. Rapid Re-Housing (RRH) is provided for families with children through the Salvation Army, and other RRH programs are available throughout the CoC for individuals and households who cannot be served by the Salvation Army. Permanent Supportive Housing is provided by Community Assisted and Supported Living, and provides permanent housing units for persons who are chronically homeless. These resources are funded through a variety of federal, state, and local funding sources, and are responsible for adhering to CoC written standards. The CoC regularly reviews project and system level performance data to determine if existing services and facilities are meeting the needs of individuals and families who are homeless.

MA-35 Special Needs Facilities and Services – 91.210(d)

Including the elderly, frail elderly, persons with disabilities (mental, physical, developmental), persons with alcohol or other drug addictions, persons with HIV/AIDS and their families, public housing residents and any other categories the jurisdiction may specify, and describe their supportive housing needs

Lee County Partnering for Results funding targets adults and children with physical and developmental disabilities and the elderly. The goal for these priority areas is to assist special populations to attain, restore or preserve their highest potential of functional abilities, independence and remain living in the least restrictive setting. Services provided include: life skills training; vocational training; home-based services including services to support caregivers; professional therapies to enhance physical and/or developmental abilities; work related programs - job readiness/placement/retention and resource coordination (including case management).

In 2018, Lee County budgeted \$4,743,971, to support programs, which provide a variety of anti-poverty services in the following categories: Children & Youth Programs and other Supportive Living services. All programs address issues to assist in reducing poverty and assisting low/moderate income households. Beginning 10/01/18, 44 programs were funded within 32 agencies in the following categories: 28 programs providing Children & Youth services and 16 providing Supportive Living services. Some agencies that are funded include: AIDS Healthcare Foundation; LARC; Lighthouse of SW Florida; IMPACT for Developmental Education; Deaf Service Center; HOPE Clubhouse; Elderly Services: Senior Friendship Centers; Dr. Piper Center; Catholic Charities; Community Cooperative Ministries.

Human and Veteran Services has a strong partnership with Goodwill Industries of Southwest Florida whose mission is to build lives, families, and communities--one job at a time by helping people with disabilities and disadvantages overcome their barriers to employment and independence. Their Job-Link centers provide job skills training, vocational training and have computer access so that clients can look for a job and submit online resumes and applications. Many computers are equipped with adaptive technology to assist people with disabilities. In addition, referrals are provided to family strengthening services through partnerships with numerous community agencies. These services address soft skills issues such as: dressing for success, resume preparation, and interviewing. They also collaborate with successful retail stores in order to provide retail training, including customer service, merchandising, loss prevention, currency tendering, and inventory. Barrier-free housing for persons with physical disabilities is also available through Goodwill.

To address the critical need of affordable rental housing for the elderly, persons with disabilities, persons with HIV/AIDS, and persons with substance use disorders in our community, Human Services partners with a variety of non-profit organizations which provide treatment, supportive services, and housing assistance. Such agencies include SalusCare, Catholic Charities, Habitat for Humanity, Protected Harbor and others. In addition, Human and Veteran Services provides direct services to persons with HIV/AIDS through the HOPWA program, and persons who are homeless through various housing programs.

Describe programs for ensuring that persons returning from mental and physical health institutions receive appropriate supportive housing

Discharge planning agreements are in place with mental and physical health providers to ensure that persons exiting these facilities receive appropriate housing. Housing and support services are provided through community partnerships. Partnerships include agencies such as the following:

HOPE Clubhouse, which provides a rehabilitation program for people living with mental illness to help members reintegrate back to the workforce.

The Florida Assertive Community Treatment Team (FACT), who promotes, develops and supports high quality assertive community treatment services that improve the lives of people with serious and persistent mental illness by supporting recovery and empowerment through collaborating, self-determination and personal choices. The FACT Team assists persons with severe and persistent mental illness who do not respond to traditional services such as outpatient or day treatment. Individualized care includes: activities and life skills case management; housing assistance; individual and group therapy; linkage to primary care and dental services; medication management; psychiatric services; and vocational assistance.

The National Alliance on Mental Illness (NAMI) offers timely information and an array of mental health peer education, training programs, and support services for people with a mental illness, family members, providers, and the public. The education and support programs provide relevant information, valuable insight, and the opportunity to engage in support networks and the information and referral coordinators answer questions about local services and to provide support concerning mental wellness.

SalusCare provides case management for children and adults; in-home therapeutic services; Functional Family Therapy; Therapeutic Behavioral On-Site Services; Supported Employment for adults; Forensic Diversion Services for those involved in the criminal justice system; outpatient psychiatric; outpatient therapy services. SalusCare also provides effective, affordable and comprehensive care to individuals and families impacted by addiction and other problem behaviors. Services provided ranging from outpatient treatment and day treatment to a more intensive residential program with continuing care in a transitional facility. Patients also are offered education, group, individual and family therapy, as well as life skills classes, based upon each person's needs and abilities.

The Center for Progress and Excellence operates a mobile crisis unit, which provides 24 hour a day, 7 day a week access to a mental health specialist to resolve immediate crisis.

Specify the activities that the jurisdiction plans to undertake during the next year to address the housing and supportive services needs identified in accordance with 91.215(e) with respect to persons who are not homeless but have other special needs. Link to one-year goals. 91.315(e)

Lee County plans to continue existing partnerships with organizations that provide housing and supportive services to persons who are not homeless, but have other special needs. In addition, Lee County plans to continue funding (as financially feasible) housing and programs that assist these individuals and families. Activities such as non-profit capital improvement and non-profit housing development will assist partner organizations to increase capacity to provide housing and services. Additional programs such as Partnering for Results and state mandated activities will continue to assist this population.

For entitlement/consortia grantees: Specify the activities that the jurisdiction plans to undertake during the next year to address the housing and supportive services needs identified in accordance with 91.215(e) with respect to persons who are not homeless but have other special needs. Link to one-year goals. (91.220(2))

One-year goals include the continuation of non-profit capital improvement activities. These activities have been funded by Lee County throughout the previous Consolidated Plan, and have improved or expanded facilities for non-profit organizations in the County. Given the need for increased housing, Lee County will also be placing special emphasis on affordable housing development by implementing a non-profit housing development activity. This activity, much like non-profit capital improvement, will assist non-profit organizations who provide housing to improve and/or expand housing resources for persons who are homeless, and those who are not homeless but have other special needs.

MA-40 Barriers to Affordable Housing – 91.210(e)

Negative Effects of Public Policies on Affordable Housing and Residential Investment

There are no identified public policies that negatively affect affordable housing and residential investment. The current Analysis of Impediments to Fair Housing for Lee County found a number of local barriers. Barriers included discrimination based on race, national origin, and/or disability; loan application denial rates have been lower for Caucasian applicants than other races/ethnicities, opposition to public housing development, insufficient accessible housing units, insufficient transportation system, and inequitable geographic distribution of public housing units. Plan goals and projects will attempt to address these barriers. An example of such a project may include housing rehabilitation, where the scope of work may address the accessibility of a unit.

MA-45 Non-Housing Community Development Assets – 91.215 (f)

Economic Development Market Analysis

Business Activity

Business by Sector	Number of Workers	Number of Jobs	Share of Workers %	Share of Jobs %	Jobs less workers %
Agriculture, Mining, Oil & Gas Extraction	2,155	1,585	2	1	-1
Arts, Entertainment, Accommodations	24,546	26,389	21	24	3
Construction	12,887	14,879	11	14	3
Education and Health Care Services	17,672	14,088	15	13	-2
Finance, Insurance, and Real Estate	7,271	6,783	6	6	0
Information	1,974	1,307	2	1	-1
Manufacturing	4,021	3,109	3	3	0
Other Services	5,081	4,877	4	4	0
Professional, Scientific, Management Services	10,303	10,263	9	9	0
Public Administration	0	0	0	0	0
Retail Trade	22,104	19,890	19	18	-1
Transportation and Warehousing	2,971	2,263	3	2	-1
Wholesale Trade	5,170	3,563	4	3	-1
Total	116,155	108,996	--	--	--

Table 40 - Business Activity

Data Source: 2011-2015 ACS (Workers), 2015 Longitudinal Employer-Household Dynamics (Jobs)

Labor Force

Total Population in the Civilian Labor Force	552,379
Civilian Employed Population 16 years and over	351,747
Unemployment Rate	10.10
Unemployment Rate for Ages 16-24	19.40
Unemployment Rate for Ages 25-65	9.10

Table 41 - Labor Force

Alternate Data Source Name:

American Community Survey 2011-2015

Data Source Comments: Table DP03; Table B23001

Occupations by Sector	Number of People
Management, business and financial	30,821
Farming, fisheries and forestry occupations	957
Service	35,109
Sales and office	49,712
Construction, extraction, maintenance and repair	16,720
Production, transportation and material moving	15,757

Table 42 – Occupations by Sector

Alternate Data Source Name:

American Community Survey 2011-2015

Data Source Comments: S1501

Travel Time

Travel Time	Number	Percentage
< 30 Minutes	152,718	57%
30-59 Minutes	95,331	36%
60 or More Minutes	18,024	7%
Total	266,073	100%

Table 43 - Travel Time

Alternate Data Source Name:
American Community Survey 2011-2015
Data Source Comments: Table: B08012

Education

Educational Attainment by Employment Status (Population 16 and Older)

Educational Attainment	In Labor Force		Not in Labor Force
	Civilian Employed	Unemployed	
Less than high school graduate	26,695	2,355	15,736
High school graduate (includes equivalency)	68,528	6,122	28,715
Some college or Associate's degree	71,157	4,722	25,060
Bachelor's degree or higher	61,753	2,744	18,900

Table 44 - Educational Attainment by Employment Status

Alternate Data Source Name:
American Community Survey 2011-2015
Data Source Comments: Table: S1501

Educational Attainment by Age

	Age				
	18-24 yrs	25-34 yrs	35-44 yrs	45-65 yrs	65+ yrs
Less than 9th grade	1,360	5,527	5,188	7,520	8,059
9th to 12th grade, no diploma	8,745	6,541	6,011	12,790	12,219
High school graduate, GED, or alternative	15,956	22,649	21,209	56,633	54,058
Some college, no degree	15,851	14,519	14,755	37,894	35,845
Associate's degree	3,965	6,223	7,495	17,016	9,954
Bachelor's degree	2,715	11,379	11,667	27,122	28,994
Graduate or professional degree	229	3,922	5,353	17,920	20,917

Table 45 - Educational Attainment by Age

Alternate Data Source Name:
American Community Survey 2011-2015
Data Source Comments: Table: B15001

Educational Attainment – Median Earnings in the Past 12 Months

Educational Attainment	Median Earnings in the Past 12 Months
Less than high school graduate	19,764
High school graduate (includes equivalency)	24,272
Some college or Associate's degree	30,326
Bachelor's degree	41,200
Graduate or professional degree	54,525

Table 46 – Median Earnings in the Past 12 Months

Alternate Data Source Name:

American Community Survey 2011-2015

Data Source Comments: Table: S1501

Based on the Business Activity table above, what are the major employment sectors within your jurisdiction?

The nearly 300,000 employed citizens of Lee County were employed in these industry sectors in 2018:

- Construction =30,165
- Trade, Transportation, and Utilities = 55,567Sector of Retail Trade is 42,587
- Professional and Business Services = 36,619
- Education and Health Services = 30,831Sector of Educational Services is represented by 3,485 (24.9% growth anticipated)Sector of Health Care and Social Assistance is represented by 27,346 employees with 15,931 working for employers of the Ambulatory Health Care Services sub-sector
- Leisure and Hospitality = 43,579Sub-Sector of Accommodation and Food Services is 35,728
- Government = 44,106

According to the Lee County Economic Development Office, some of the major employers located in Lee County include Lee Health System (11,868); Lee County School District (11,680); Lee County Administration (2,692); City of Cape Coral (1,800); Lee County Sheriff's Office (1,612); Gartner (1,600); Chico's (1,500); Florida Gulf Coast University (1,401); Shell Point Retirement Community (1,068) and Florida Southwestern State College (983); and the City of Fort Myers (920). Approximately 13 percent or 37,124 people of Lee County's civilian workforce are employed by these top ten employers.

Describe the workforce and infrastructure needs of the business community:

Data provided by the Florida Department of Economic Opportunity indicates a 12.7 percent grown rate in all industries in Lee County by 2026. Those industries with the highest growth rates include Construction (14.3 percent), Mining (13.2 percent), Education and Health Services (23.5 percent), Professional and Business Services (13.9 percent), and government (13.4 percent).

Consultation with the Southwest Florida Workforce Development Board revealed occupational demands bridge many industries. As an example, a chef may be employed in a variety of industries: Manufacturing (Food Manufacturing - LeeSar); Educational and Healthcare Services - Education (Estero High School or Technical Colleges), Health Care (Medical Hospital or Residential Care Facility); Leisure and Hospitality

- Accommodations (Resorts, Hotels), Food Service (Restaurants). The prediction of growth of an occupation is by percentage of growth as well as by job openings. In Lee County the top ten fastest growing occupations (percentage of growth) for the period of 2018-2026 are:

- Physician Assistants at 39.2% with total job opening during the period of 220
- Nurse Practitioners at 38.4% with total job opening during the period of 156
- Personal Care Aides at 33.6% with total job opening during the period of 1,853
- Business Teachers, Postsecondary at 33.3% with total job opening during the period of 157
- Respiratory Therapists at 32.3% with total job opening during the period of 406
- Health Specialties Teachers, Postsecondary at 31.5% with total job opening during the period of 151
- Physical Therapist Assistants at 31.5% with total job opening during the period of 375
- Medical Assistants at 29.7% with total job opening during the period of 2,702
- Logisticians at 28.5% with total job opening during the period of 231
- Diagnostic Medical Sonographers at 28.4% with total job opening during the period of 171

Compare the occupations with the most new jobs for the same period are: Retail Salespersons at 17,073 total job openings; Waiters and Waitresses at 16,125 total job openings; Cashiers at 14,361 total job openings; Combined Food Preparation and Serving Workers, Including Fast Food at 11,995 total job openings; Landscaping and Grounds keeping Workers at 8,722 total job openings.

Describe any major changes that may have an economic impact, such as planned local or regional public or private sector investments or initiatives that have affected or may affect job and business growth opportunities during the planning period. Describe any needs for workforce development, business support or infrastructure these changes may create.

Consultation with the Southwest Florida Workforce Development Board revealed two major events that may affect job growth in Lee County.

Tourism and toxic algae

The water quality crisis of 2018 had a great influence on tourism numbers demonstrated by three factors [per Davidson Peterson Associates]:

- 1) Average occupancy rate declined by 3.6% (to 65.2)
- 2) Average daily rate fell 2.7% (to \$142.07)
- 3) Revenue per available room decreased 6.2% (92.55)

Since the data concerning occupations reflect those low paying workers - the impact of this economic event effects the most vulnerable workers. These changes created an opportunity for workforce development to increase outreach efforts to effected businesses and workers. Outreach included information and referrals so information about skills upgrading and educational opportunities were

shared. The cyclical, seasonal demand of direct services in a tourism economy is not conducive to the educational cycles so many workers/businesses continue to be vulnerable to the unpredictability of the Leisure and Hospitality industry. The Southwest Florida Workforce Development Board is working with educational and training providers exploring water treatment programs. A technical college is researching credentialing and curriculum through the Department of Education.

State of Florida seeks contractors for post-Irma work

The Florida Department of Economic Opportunity Executive Director Ken Lawson issued a call for qualified general contractors to assist the Rebuild Florida program. Rebuild Florida is a long-term recovery effort to repair and rebuild thousands of homes that were affected by Hurricane Irma (DEO News, March 1, 2019). Many homes and vulnerable citizens continue to seek assistance in Lee County.

Workforce Development has and continues to support the Construction industry via partnerships and taskforces. A recent initiative includes an Apprenticeship Program in Masonry. In August of 2018 an opportunity to serve a minimum of Migrant, Seasonal Farmworkers (MSFW) and their eligible family members was introduced. Those eligible participants would be guided to employment opportunities with local construction businesses associated with the Florida Masonry Apprentice and Education Foundation (West Coast). Additional education is scheduled for one evening per week and one Saturday each month. Apprentices learn as they work over a three-year period with guaranteed hourly wage increases (5%) with their starting wage being a minimum of \$15 per hour. Participants are able to become a Certified Mason and receive a national, industry-recognized certification from NCCER.

How do the skills and education of the current workforce correspond to employment opportunities in the jurisdiction?

The workforce would benefit from relevant job training for the businesses located in Lee County. Training is provided through targeted programs, which are available, but may need improvements to ensure that prospective students are aware of available programs and have the resources necessary to attend training. Public input received regarding economic development emphasized the need for skilled trades job training. Staff discussion revealed that several skilled trades job programs exist, but acknowledged that consumers may not be aware of such programs. HVS will be coordinating with the Southwest Florida Workforce Development Board to determine was to remedy this need.

Describe any current workforce training initiatives, including those supported by Workforce Investment Boards, community colleges and other organizations. Describe how these efforts will support the jurisdiction's Consolidated Plan.

The assessment of business' current and future needs is key to regional economic and business success. By using data collected by the Department of Economic Opportunity, Labor Market Statistics; Department of Economic Opportunity, Bureau of Workforce Statistics & Economic Research; and, regional and local surveys, the Southwest Florida Workforce Development Board and its CareerSource Southwest Florida partner with educational providers to assure workforce-training opportunities are available. Skills training and skill upgrading is a continuous project so that the worker and future

employee meet business' needs. Collaborating with educators who guide participants through approved curriculum is as important as the efforts resulting in credentialing, diplomas and degrees.

CareerSource centers offer workforce, foundational skills training so individuals are able to recognize behavioral skills desired by local employers - teamwork, timeliness, etc. Workshops in a variety of topics are available at centers and on-line via website (www.careersourcesouthwestflorida.com/jumpstart-your-career-2/). Lee County citizens may attend no-cost workshops at the center located at 4150 Ford Street Extension and access the workshop calendar via website. Topic of these workshops include Center Services Orientation; Interviewing Skills and Job Search; Employ Florida Registration; iCareers and Labor Market Information; Resume and Cover Letters; Dressing for Interviewing - Making a Good First Impression; and, Employer Expectations.

Each year the Southwest Florida Workforce Development Board examines occupations that are considered high skill, high wage occupations and are projected to be in-demand and research training opportunities that align with those occupations. Updated lists of occupations and training providers is published, uploaded, and distributed throughout the community. CareerSource Southwest Florida center staff and educators are informed of changes so that information and referrals to customers in correct. Citizens are informed of Labor Market trends, occupational skill demands, and training providers to afford an informed decision. Individuals with upgraded skills are referred to local employers and job banks to secure employment opportunities.

In addition, businesses are offered opportunities through the Business Services at the CareerSource Southwest Florida centers. Businesses can take advantage of the no-cost services available by posting job openings, and allowing Career Development Professionals to screen and refer potential candidates. Assistance to individuals and businesses in identifying cost saving employment programs that can provide tax credits, employee boning, on-the-job training, and skill gap education. On-site recruitment facilities as well as executive search, family relocation assistance, industry surveys, labor market information, and professional career network opportunities are available.

Education Fairs, Hiring Events and Regional Career Fairs are available to business and job seeker customers and information is dispersed through regional media sources and partners.

Does your jurisdiction participate in a Comprehensive Economic Development Strategy (CEDS)?

No

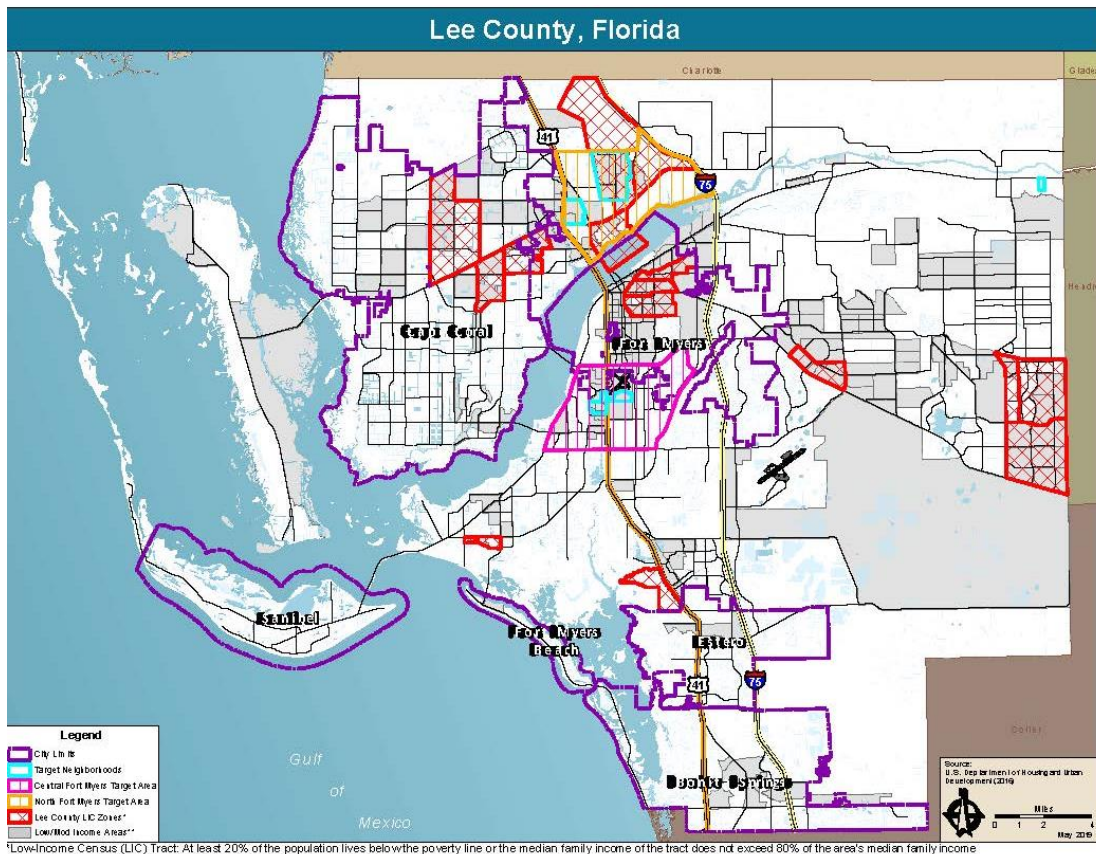
If so, what economic development initiatives are you undertaking that may be coordinated with the Consolidated Plan? If not, describe other local/regional plans or initiatives that impact economic growth.

Lee County's Economic Development Department has many initiatives that impact economic growth.

Among these initiatives are expanding access to capital for Lee County businesses at all stages of the company lifecycle, improving the connectivity of veterans to entrepreneurial and small business assistance, and working to connect tech industry professionals with civic engagement through Code for America. These initiatives are facilitated through the identification and participation of local industry representatives and partner organizations to create actionable programs and improve connectivity to resources.

There are numerous other local and regional plans that are in various stages of implementation that impact economic growth, including the Lee Plan, a comprehensive community development plan that is being revised and will become the New Horizon 2035 Plan. This Plan’s goals, objectives, and policies will be using a sustainable vision for growth and development through 2035. The plan has been developed through 40 community workshops, and includes initiatives for making the County an economically and environmentally desirable place to live, work and visit.

Another initiative is the alignment of economic development incentives with designated Opportunity Zones. In 2018, 15 census tracts throughout Lee County, FL were designated as Opportunity Zones. These zones are economically-distressed communities where new investments, under certain conditions, may be eligible for preferential tax treatment. The Lee County EDO has created an integrated Geographic Information Systems based portal to provide information on the Opportunity Zones and related programs to investors and businesses. A map displaying Lee County’s Opportunity Zones along with local target areas is attached.



Discussion

In addition to economic development, specific non-housing community development needs resulting from climate change are an important consideration in Southwest Florida. The Southwest Florida (SWFL) Community Foundation collaborated with the Conservancy of SWFL to conduct a community survey to better understand attitudes and beliefs around climate change. The summary indicates, “Hurricane Irma, along with recent red tide and toxic algae outbreaks, has the majority of Southwest Floridians deeply concerned about the changing climate.” Survey results found:

- 93 percent agree that local, state and federal governments should do more to protect mangroves and wetlands.
- 83 percent agree that more extreme weather and storms threaten the well-being of our community.
- 78 percent agree that rising sea levels threaten the well-being of our community.
- 69 percent say red tide and blue-green algae outbreaks are being made worse by the changing climate and pollution.
- 67 percent say Hurricane Irma caused them to be more concerned about the changing climate.
- 63 percent say Hurricane Irma motivated them to do more to prepare for the changing climate.

Source: <https://www.conservancy.org/climatechange>

To identify and support solutions to climate change threats, the Community Foundation collaborated with FGCU and the Conservancy to establish Growing Climate Solutions – Path to Positive Southwest Florida. This partnership aims to increase our region’s capacity to address climate change. The Conservancy will be hiring a Senior Regional Program Coordinator to spearhead many of these efforts.

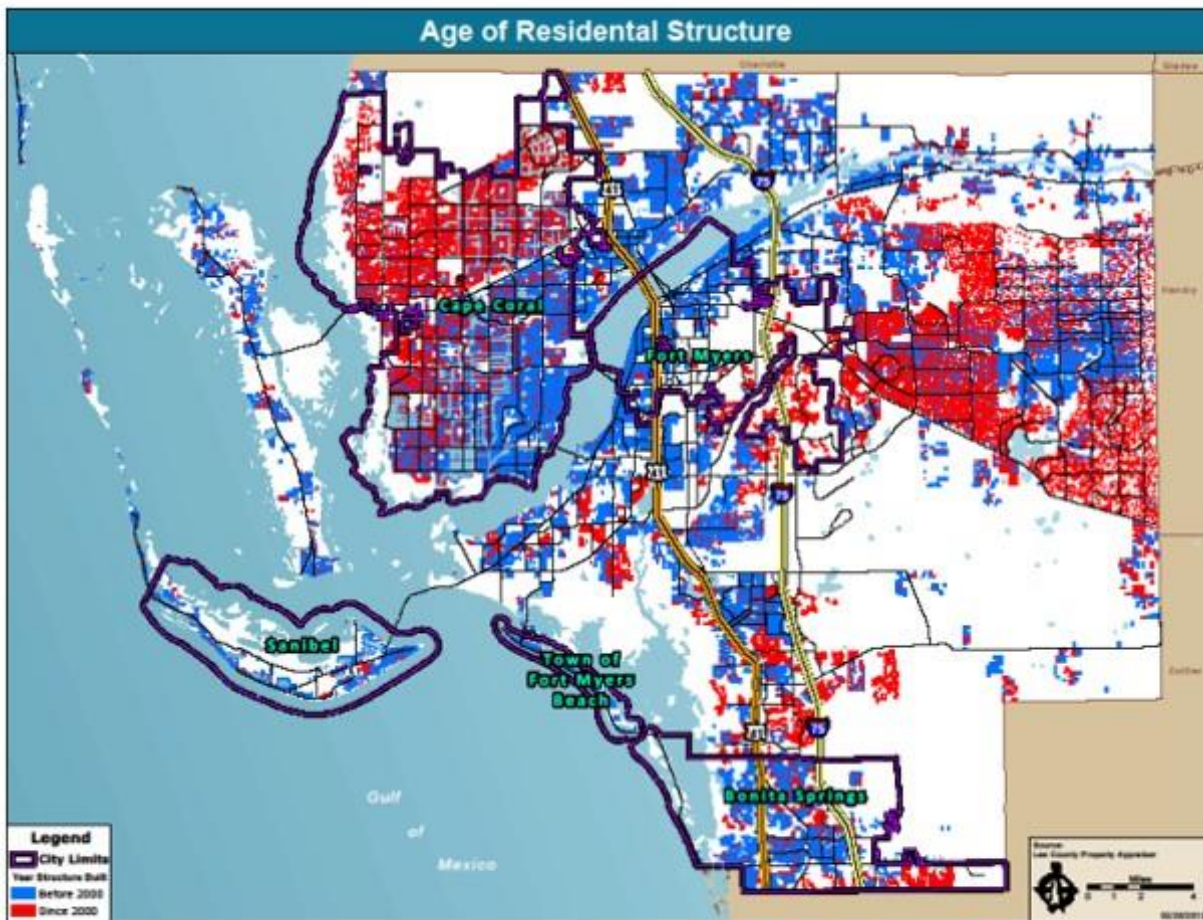
<https://floridacommunity.com/growing-climate-solutions-path-to-positive-southwest-florida-partnership-launches/>

A community Green House Gas (GHG) Inventory for Lee County was completed for calendar year 2017. The report indicates, “GHG emissions from the County as a whole for 2017 (excluding power generation facilities) were 9,409,385 metric tons CO₂e. This is an increase from 2012 of 10.1% (864,884 MT CO₂e) but is still a decrease from baseline (2007) levels of nearly 5%. Based on the 2017 population of 698,468, a per capita carbon footprint of 13.47 MT CO₂e per person is estimated, a slight increase from 2012 (13.39 MT) and considerably reduced from the 16 MT estimated in 2007.” (See Report Attached)

MA-50 Needs and Market Analysis Discussion

Are there areas where households with multiple housing problems are concentrated? (include a definition of "concentration")

There are no specific concentrations of households with multiple housing problems. As previously discussed more than 50 percent of all housing units in Lee County will be more than 20 years old in 2019. These units are located throughout the County, and are not concentrated in a specific area, as demonstrated on the attached map. Many units within the County are also reach over 30 years of age. According to the U. S. Census Bureau’s 2013-2017 American Community Survey, 24.64 percent of Lee County’s housing stock is over 30 years old. High percentages of pre-1980 housing units are located in the older neighborhoods of the Town of Fort Myers Beach, City of Sanibel, and the City of Fort Myers. Cities of Bonita Springs and Cape Coral have relative newer housing stocks.



Are there any areas in the jurisdiction where racial or ethnic minorities or low-income families are concentrated? (include a definition of "concentration")

A racially or ethnically concentrated area of poverty (R/ECAP) means a geographic area, based on the most recent American Community Survey, with significant concentrations of extreme poverty and minority populations. HUD has defined a “Racially and Ethnically Concentrated Area of Poverty (RCAP/ECAP)” as a census tract with 40 percent or more of individuals living at or below the poverty line and a non-White population of 50 percent or more. In Lee County, there is one racially and ethnically concentrated areas of poverty (RCAP/ECAP), which is located in the City of Fort Myers; census tract 7. There are no R/ECAPs identified in Unincorporated Lee County.

What are the characteristics of the market in these areas/neighborhoods?

There are no R/ECAPs identified within Lee County's jurisdiction.

Are there any community assets in these areas/neighborhoods?

There are no R/ECAPs identified within Lee County's jurisdiction.

Are there other strategic opportunities in any of these areas?

There are no R/ECAPs identified within Lee County's jurisdiction.

Strategic Plan

SP-05 Overview

Strategic Plan Overview

There are five priority needs identified here within. Those needs are affordable housing, housing and services for the homeless, public facility improvements, economic development and community revitalization. This plan outlines eight goals and a variety of outcome indicators to address the identified needs. Those goals and outcomes are as follows:

1. Affordable Housing Development

Outcome 1: Rental Housing Added: 100 units

Outcome 2: Homeowner Housing Added: 5 units

2. Housing Rehabilitation and Reconstruction

Outcome 1: Rental Housing Rehabilitated: 20 units

Outcome 2: Homeowner Housing Rehabilitated: 198 units

3. Down Payment Assistance

Outcome 1: Assistance to Homebuyers: 131 households

4. Housing and Services for Persons who are Homeless

Outcome 1: Public Service Activities (other than housing): 2125 persons

Outcome 2: Tenant Based Rental Assistance/Rapid Re-Housing: 190 households

5. Public Services for Community Revitalization

Outcome 1: Public Service Activities (other than housing): 9495

6. Infrastructure Improvements

Outcome 1: Infrastructure Activities (other than housing): 10,000 persons

7. Economic Development

Outcome 1: Businesses Assisted: 1 business

8. Public Facility Improvements

Outcome 1: Public Facilities Improved: 5 non-profit organization

SP-10 Geographic Priorities – 91.215 (a)(1)

Table 47 - Geographic Priority Areas

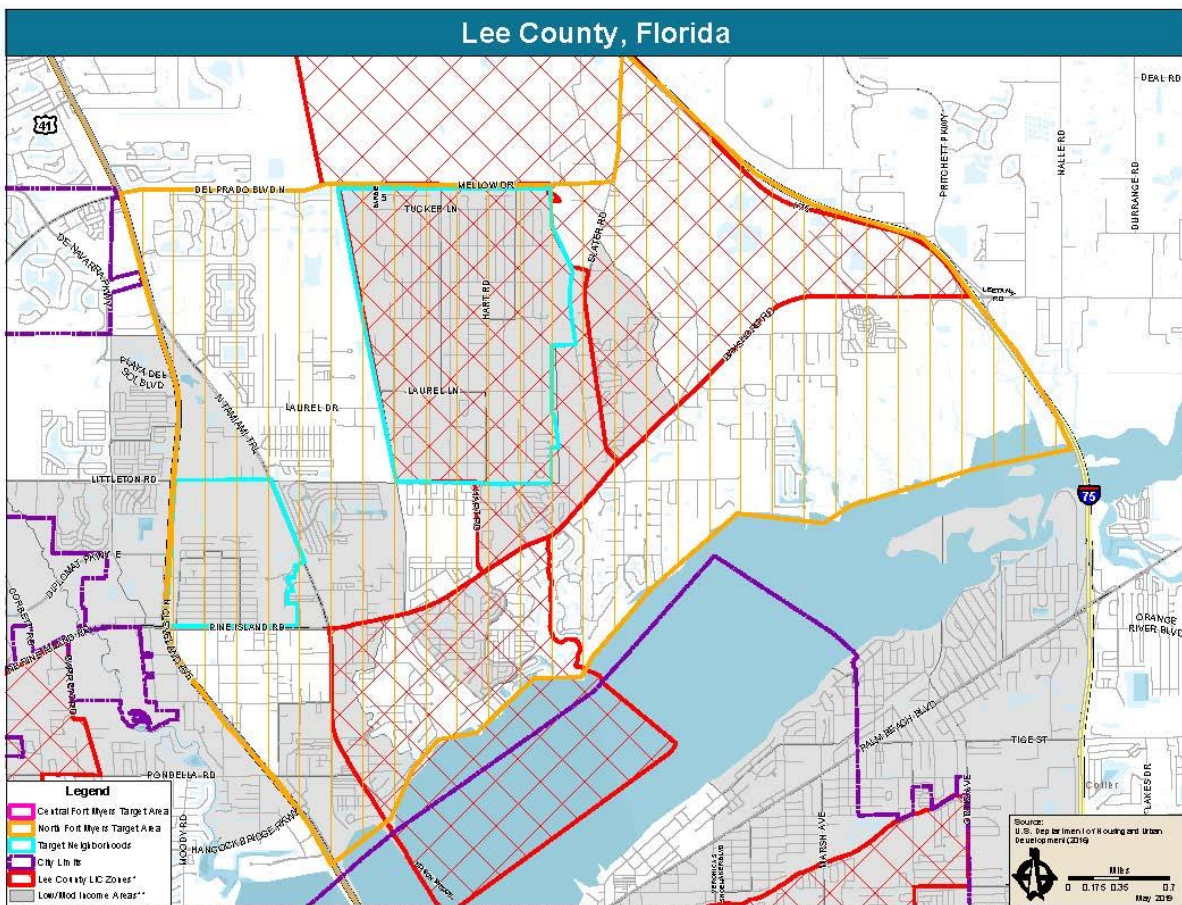
1	Area Name:	Central Fort Myers
	Area Type:	Local Target area
	Revital Type:	Comprehensive
	Identify the neighborhood boundaries for this target area.	The neighborhoods that will be targeted within this area are Page Park and Pine Manor.
	Include specific housing and commercial characteristics of this target area.	Page Park has many single family units, both detached and attached (duplexes), and there have not been many newly constructed units in this neighborhood. There are many commercial properties in the neighborhood.
	How did your consultation and citizen participation process help you to identify this neighborhood as a target area?	Neighborhoods that have an organized group of citizen volunteers expressing the desire to revitalize the area, and who have an area that is comprised of households at or below 80 percent area median income, may be admitted into the Neighborhood Building Program. Consultation with the neighborhood associations is conducted on a quarterly basis, and representatives serve on the CAA/NDC advisory committee, where public hearings for the plan’s development occur. Page Park and Pine Manor have participated in the program for a number of years, and while many infrastructure needs have been addressed through previous CDBG funding, the neighborhood’s association has expressed the need for continued public services and improvements to housing stock as two priorities.
	Identify the needs in this target area.	Needs in Page Park and Pine Manor include continued and expanded public service programs, and and improvements to the areas housing stock.
	What are the opportunities for improvement in this target area?	Improvements that could be made to Page Park and Pine Manor include increase public service activities and owner occupied housing rehabilitation.
	Are there barriers to improvement in this target area?	A major barrier to improvement in Page Park is the instability of paid and volunteer staff in the community center, which requires frequent training and may cause programming delays. A major barrier to improvements in Pine Manor is its transitory resident base. Many of the housing units in this neighborhood are rentals, and often the units turnover, which results in potentially different needs in these households.
2	Area Name:	North Fort Myers
	Area Type:	Local Target area

Revital Type:	Comprehensive
Identify the neighborhood boundaries for this target area.	The neighborhoods that will be targeted within this area are Suncoast Estates and Palmona Park.
Include specific housing and commercial characteristics of this target area.	Suncoast has many large residential lots, which are occupied mostly by manufactured housing. There are some commercial properties in the neighborhood. Palmona Park is primarily housing; many units are manufactured housing and lots are smaller than most single-family detached unit lots. There are not many commercial properties, except for the boundary areas.
How did your consultation and citizen participation process help you to identify this neighborhood as a target area?	Neighborhoods that have an organized group of citizen volunteers expressing the desire to revitalize the area, and who have an area that is comprised of households at or below 80 percent area median income, may be admitted into the Neighborhood Building Program. Consultation with the neighborhood associations is conducted on a quarterly basis, and representatives serve on the CAA/NDC advisory committee, where public hearings for the plan's development occur. Suncoast Estates has participated in the program, but is considered one of the newer neighborhoods. This area still has many infrastructure, public service, and housing needs. Palmona Park has participated in the program, and still has several public service, and housing needs.
Identify the needs in this target area.	Needs in Suncoast Estates include continued and expanded public service programs, housing, and infrastructure needs. Needs in Palmona Park include continued and expanded public service programs and housing improvements.
What are the opportunities for improvement in this target area?	Improvements that could be made to Suncoast Estates include pedestrian and bicycle improvements, transit improvements, and housing rehabilitation. Improvements that could be made to Palmona Park include provision of public services and housing rehabilitation.
Are there barriers to improvement in this target area?	A major barrier to improvements in Suncoast Estates is its size; it is the largest neighborhood in the program, so the needs are greater overall.

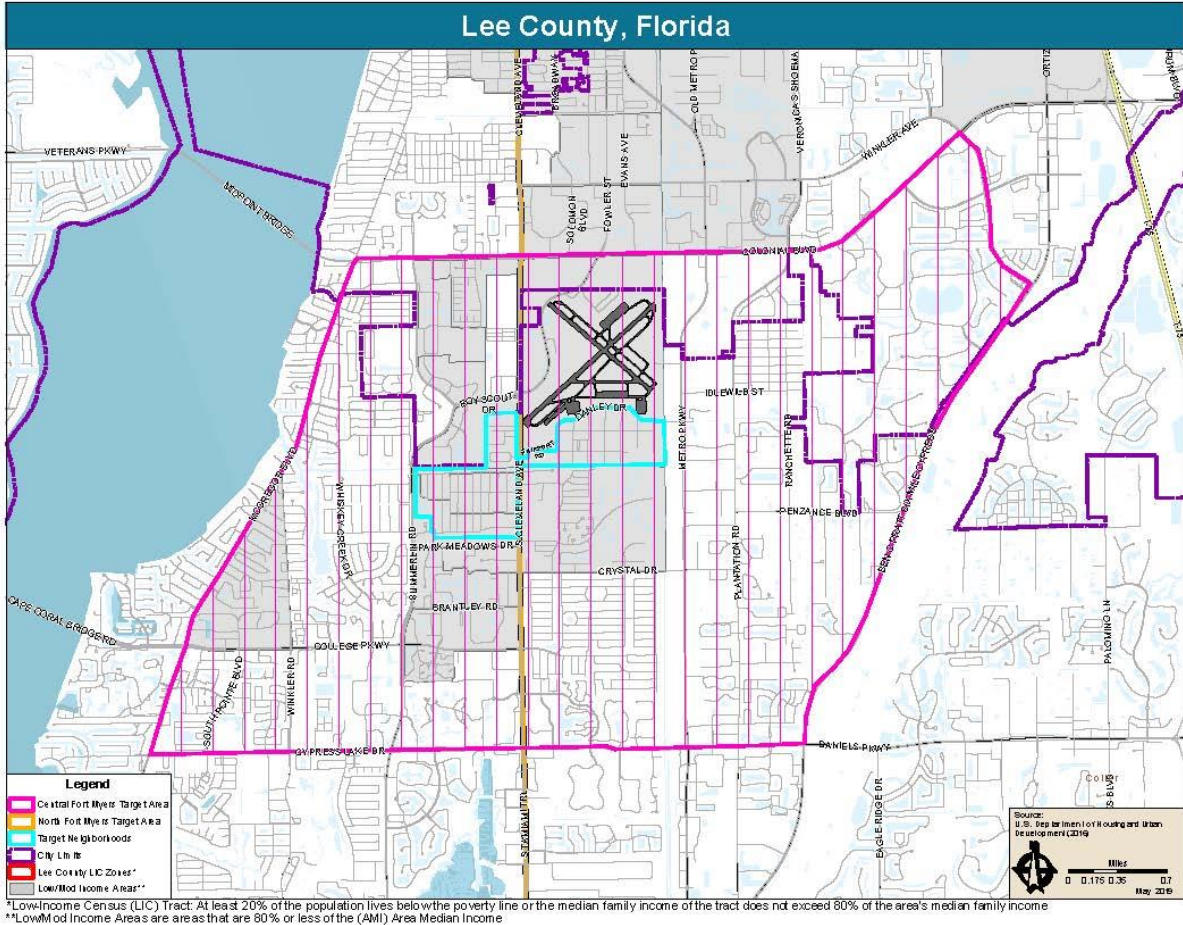
General Allocation Priorities

Describe the basis for allocating investments geographically within the jurisdiction (or within the EMSA for HOPWA)

CDBG funds will be invested in unincorporated Lee County and Urban County partner areas. Some projects, such as administrative activities, owner occupied housing rehabilitation, and coordination of housing and services for persons who are homeless are conducted in all areas, with no targeting. There are however, activities that will administered only within the specified target areas, and in the Urban County partner municipalities. HOME and ESG funds are invested countywide and are not targeted to any particular geographic area.



North Fort Myers Target Area



Central Fort Myers Target Area

SP-25 Priority Needs - 91.215(a)(2)

Table 48 – Priority Needs Summary

1	Priority Need Name	Affordable Housing
	Priority Level	High
	Population	Extremely Low Low Moderate Middle Large Families Families with Children Elderly Public Housing Residents Elderly Frail Elderly Persons with Mental Disabilities Persons with Physical Disabilities Persons with Developmental Disabilities Persons with Alcohol or Other Addictions
	Associated Goals	Affordable Housing Development Housing Rehabilitation and Reconstruction Down Payment Assistance
	Description	<div>Affordable housing is needed for all income levels and in all areas of the jurisdiction.</div>
	Basis for Relative Priority	<div>Data, consultation, and public input all reveal a need for affordable housing opportunities in Lee County.</div>
	2	Priority Need Name
Priority Level		High
Population		Extremely Low Low Chronic Homelessness Individuals Mentally Ill Chronic Substance Abuse Persons with HIV/AIDS Unaccompanied Youth
Associated Goals		Housing and Services for Persons who are Homeless

	Description	Emergency, transitional, and permanent housing and re-housing needs, along with supportive services, and applicable operating expenses.
	Basis for Relative Priority	Data, consultation, and public input reveal a need for housing and supportive services for persons experiencing homelessness in Lee County.
3	Priority Need Name	Public Facility Improvements
	Priority Level	High
	Population	Extremely Low Low Moderate Elderly Frail Elderly Persons with Mental Disabilities Persons with Physical Disabilities Persons with Developmental Disabilities Persons with Alcohol or Other Addictions Persons with HIV/AIDS and their Families Victims of Domestic Violence Non-housing Community Development
	Associated Goals	Public Facility Improvements
	Description	Public facilities needs include necessary improvements and expansions to facilities owned by non-profit organizations. These needs may include a variety of projects/solutions that will benefit low to moderate income persons, and non-homeless persons with special needs.
	Basis for Relative Priority	Data, consultation, and public input all reveal a need for public facility improvements.
4	Priority Need Name	Economic Development
	Priority Level	Low
	Population	Extremely Low Low Moderate Non-housing Community Development
	Associated Goals	Economic Development

	Description	Economic Development needs may include special economic development initiatives.
	Basis for Relative Priority	Consultation and public participation revealed the need for economic development activities.
5	Priority Need Name	Community Revitalization
	Priority Level	Low
	Population	Extremely Low Low Moderate Large Families Families with Children Elderly Non-housing Community Development
	Geographic Areas Affected	North Fort Myers Central Fort Myers
	Associated Goals	Public Services for Community Revitalization Infrastructure Improvements
	Description	Targeted revitalization is needed for specific low income areas of the jurisdiction.
	Basis for Relative Priority	Data, consultation and public input reveal a need for revitalization of targeted areas in Lee County.

SP-30 Influence of Market Conditions – 91.215 (b)

Influence of Market Conditions

Affordable Housing Type	Market Characteristics that will influence the use of funds available for housing type
Tenant Based Rental Assistance (TBRA)	The use of HOME funds for Tenant Based Rental Assistance (TBRA) is planned to continue throughout the duration of this plan. The CoC Strategic Plan and Homeless Management Information System (HMIS) data indicates that there is a substantial need for permanent housing for individuals who are experiencing homelessness. TBRA, as designed locally, is intended to serve persons with acute housing and services needs through rental subsidy and intensive case management.
TBRA for Non-Homeless Special Needs	TBRA for non-homeless special needs is not planned.
New Unit Production	Current market condition supports the need for the production of new affordable housing units. Those units will be developed through CDBG/HOME Non-Profit Housing and HOME Community Housing Development Organization (CHDO) activities.
Rehabilitation	Current market conditions support the needs for rehabilitation. As many of Lee County's housing unit approach 20 years of age, the need for rehabilitation is expected to grow throughout the duration of this plan. CDBG Owner Occupied Rehabilitation/Reconstruction activities will address this need.
Acquisition, including preservation	Acquisition of housing may take place in coordination with CDBG/HOME Non-Profit Housing and HOME Community Housing Development Organization (CHDO) activities. Such activities may include acquisition and/or rehabilitation of property and existing units to increase and/or preserve Lee County's affordable housing stock.

Table 49 – Influence of Market Conditions

SP-35 Anticipated Resources - 91.215(a)(4), 91.220(c)(1,2)

Program	Source	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan	Narrative Description
			Annual Allocation	Program Income	Prior Year Funds	Total		
CDBG	public - federal	Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services	3,047,518	20,000	0	3,067,518	15,337,590	CDBG funds will be used in accordance with 24 CFR 570 and this Consolidated Plan to further address community development, housing, and homeless needs in Lee County.
HOME	public - federal	Acquisition Homebuyer assistance Homeowner rehab Multifamily rental new construction Multifamily rental rehab New construction for ownership TBRA	938,598	75,000	0	1,013,598	5,067,990	HOME funds will be used in accordance with 24 CFR 92 and this Consolidated Plan to address housing needs in Lee County.
ESG	public - federal	Conversion and rehab for transitional housing Financial Assistance Overnight shelter Rapid re-housing (rental assistance) Rental Assistance Services Transitional housing	255,297	0	0	255,297	1,276,485	ESG funds will be used in accordance with 24 CFR 576 and this Consolidated Plan to provide housing and services to persons experiencing homelessness in Lee County.

Program	Source	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan	Narrative Description
			Annual Allocation	Program Income	Prior Year Funds	Total		
Continuum of Care	public - federal	Admin and Planning Financial Assistance Housing Public Services Rapid re-housing (rental assistance) Rental Assistance Services TBRA Transitional housing	1,835,581	0	0	1,835,581	9,177,905	Lee County is the Collaborative Applicant for the Continuum of Care. Legacy Shelter Plus Care and Supportive Housing Program (now Continuum of Care) funds are used by Community Assisted and Supported Living to provide Permanent Supportive Housing, the Salvation Army uses funds for rapid re-housing for families, and the Lee County Housing Development Corporation uses funds for rapid re-housing for victims of domestic violence.
General Fund	public - local	Admin and Planning Financial Assistance Overnight shelter Public Services Rapid re-housing (rental assistance) Rental Assistance Services	5,508,522	0	0	5,508,522	27,542,610	General funds dollars are allocated to support Partnering for Results programs (\$4,743,971), the Bob Janes Triage Center (\$571,301), and housing and services for persons who are homeless (\$193,250).

Program	Source	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan	Narrative Description
			Annual Allocation	Program Income	Prior Year Funds	Total		
Other	public - state	Admin and Planning Financial Assistance Housing Public Services Rapid re-housing (rental assistance) Rental Assistance Services	300,607	0	0	300,607	901,821	Funds are awarded through a competitive process conducted by the Florida Department of Children and Families' Office on Homelessness. In the 2019-2022 funding competition, Lee County was awarded \$300,607 in grant funds to administer Secure Paths, a safe parking and permanent housing program, the Outreach Project, a project aimed at engaging persons living unsheltered in Lee County, and to contract with Lee County Housing Development Corporation to administer a homelessness prevention program.
Other	public - state	Admin and Planning Financial Assistance Rental Assistance Services TBRA	157,648	0	0	157,648	788,240	HOPWA funds are provided to HVS through the State and Department of Health. Funds are used to provide tenant based rental assistance and intensive case management for persons with HIV/AIDS who are experiencing homelessness.
Other	public - state	Admin and Planning Financial Assistance Services	1,329,144	0	0	1,329,144	6,645,720	LIHEAP funds are provided to HVS through the Florida Department of Economic Opportunity to assist low-income persons with electricity expenses.

Program	Source	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan	Narrative Description
			Annual Allocation	Program Income	Prior Year Funds	Total		
Other	public - state	Admin and Planning Homebuyer assistance Housing Rapid re-housing (rental assistance) Rental Assistance	218,807	0	0	218,807	1,094,035	SHIP funds are awarded to Lee County Department of Community Development. A portion of funds are passed through to Lee County Human and Veteran Services for the administration of down payment assistance and homelessness prevention programs.
Other	public - state	Admin and Planning Housing Public Services Rapid re-housing (rental assistance) Rental Assistance Services	467,142	0	0	467,142	2,335,710	Community Services Block Grant funds are used for homeless prevention, re-housing programs, financial literacy and job training.

Table 50 - Anticipated Resources

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

Federal funds will leverage other funds by referring identified at-risk households or homeless households to appropriate programs for prevention or re-housing. Services provides are funded with Lee County General funds, Continuum of Care programs, HOPWA and CSBG. Additionally, State SHIP funds are used to assist low-income persons with down payment assistance, and provide match for HOME funded projects. ESG will be matched with County General funds, as well as other resources documented by sub-recipients. Some CDBG funds will be concentrated on neighborhood revitalization, and will be used in the targeted areas noted in this Consolidated Plan. These funds will be leveraged with private funds gathered by neighborhood organizations through fundraising.

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

There are no publicly owned lands or properties that are currently identified for projects in this plan.

SP-40 Institutional Delivery Structure – 91.215(k)

Explain the institutional structure through which the jurisdiction will carry out its consolidated plan including private industry, non-profit organizations, and public institutions.

Responsible Entity	Responsible Entity Type	Role	Geographic Area Served
Lee County	Government	Economic Development Homelessness Non-homeless special needs Ownership Planning Rental neighborhood improvements public facilities public services	Jurisdiction
Housing Authority of the City of Fort Myers	PHA	Public Housing	Jurisdiction
City of Bonita Springs	Government	Non-homeless special needs neighborhood improvements public facilities	Jurisdiction
City of Sanibel	Government	Non-homeless special needs Rental neighborhood improvements public facilities	Jurisdiction
Town of Fort Myers Beach	Government	Non-homeless special needs neighborhood improvements public facilities public services	Jurisdiction

Responsible Entity	Responsible Entity Type	Role	Geographic Area Served
Lee County Homeless Coalition	Non-profit organizations	Homelessness Planning	Jurisdiction
Lee County Housing Development Corporation	CHDO	Ownership Rental	Jurisdiction
Affordable Homeownership Foundation Inc.	CHDO	Ownership Rental	Jurisdiction
Village of Estero	Government	Economic Development Non-homeless special needs neighborhood improvements public facilities	Jurisdiction

Table 51 - Institutional Delivery Structure

Assess of Strengths and Gaps in the Institutional Delivery System

The project and activities listed in this Consolidated Plan will primarily be completed by Lee County. Urban county activities will be completed by each partner. Activities related to Public Housing will be completed by the Housing Authority of the City of Fort Myers and/or the Lee County Housing Authority.

Sub recipient and developer contracts will be used during the five-year period, but sub recipients are yet unknown. All sub recipients will be selected through the completion of one of the six models for assessing applications and selection sub recipients, as required by local procurement and HVS policy and as suitable for the project/activity type. The six models for assessing applicants and selection sub recipients can be viewed in detail in Chapter 2 of the "Managing CDBG: A guidebook for CDBG Grantees on Sub recipient Oversight" handbook, and are listed below.

- Model 1: Formal Applications or Request for Applications (RFA)
- Model 2: Simplified or Limited Application with Grantee Follow-up
- Model 3: Direct Solicitation of Qualified Organizations
- Model 4: Accepting Unsolicited Applications
- Model 5: Review existing sub recipients' performance and continue to fund existing programs when warranted
- Model 6: Mixed approach that uses strengths of other models

Agency partners work well with the County and with each other, and there are not any identified gaps to the delivery system.

Availability of services targeted to homeless persons and persons with HIV and mainstream services

Homelessness Prevention Services	Available in the Community	Targeted to Homeless	Targeted to People with HIV
Homelessness Prevention Services			
Counseling/Advocacy	X	X	X
Legal Assistance	X		
Mortgage Assistance	X		
Rental Assistance	X	X	X
Utilities Assistance	X	X	X
Street Outreach Services			
Law Enforcement	X	X	
Mobile Clinics	X	X	
Other Street Outreach Services	X	X	X
Supportive Services			
Alcohol & Drug Abuse	X	X	
Child Care	X		
Education	X		
Employment and Employment Training	X	X	
Healthcare	X	X	
HIV/AIDS	X	X	X
Life Skills	X	X	
Mental Health Counseling	X	X	
Transportation	X	X	

Table 52 - Homeless Prevention Services Summary

Describe how the service delivery system including, but not limited to, the services listed above meet the needs of homeless persons (particularly chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth)

Housing and services for persons experiencing homelessness are provided through the Lee County Continuum of Care (CoC). The Continuum of Care is a broad group of individual stakeholders and organizations who are engaged to ensure that homelessness is rare, brief, and one-time. Collaboration among CoC members occurs through regular meetings of the Lee County Homeless Coalition and various subcommittees. The CoC Governing Board has been established to act on behalf of the CoC membership to oversee the responsibilities of the CoC, the operation of the Homeless Management Information System (HMIS), the implementation of the Coordinated Entry System, and to complete long-term strategic planning.

The guidance of the CoC Board and collaboration within the CoC has served to reduce homelessness in Lee County by 58% since 2009, mirroring national trends. Since 2013, the number of individuals experiencing homelessness on a single night in January, in Lee County, has dropped by more than 377. Lee County leverages several federal, state, and local funding sources to address the needs of individuals and families who are homeless. As the Lead Agency for the Continuum of Care,

Lee County Human and Veteran Services is responsible for making funding applications, contracting with sub-recipients, and monitoring performance. From 2009 through 2017, more than \$16.9 million dollars in HUD Continuum of Care funds have been awarded to provide housing and services to persons experiencing homelessness. In fiscal year 2018, the CoC was awarded more than \$10.4 million in federal, state, and local funds to provide housing and services to persons experiencing homelessness.

The homeless housing and service providers within the CoC are required to coordinate with mainstream services. A primary function of case management is to make and coordinate referrals with community resources and mainstream services such as Food Stamps, Medicaid, Child Care, SSI/SSDI, Veteran's Services, Section 8 Housing, mental health services, abuse services, etc. Staff from all funded agencies are required to make referrals and ensure clients access the referred services. Staff must also make necessary accommodations to ensure that clients needing additional assistance to utilize those services have the necessary resources. Client files from funded agencies are monitored to ensure that referrals and accommodations are appropriate, consistent, and timely.

Describe the strengths and gaps of the service delivery system for special needs population and persons experiencing homelessness, including, but not limited to, the services listed above

As previously noted, agency partners in Lee County work well together to meet the needs of residents, and create a strong service delivery system. Special needs populations and the homeless are provided numerous services and have access to many programs, which are listed elsewhere in this consolidated plan. A weakness to the continuum of services may be the engagement of new service or housing providers in the area, but CoC Strategic Plan outlines Action Steps that the CoC intends to take to remedy this weakness.

Provide a summary of the strategy for overcoming gaps in the institutional structure and service delivery system for carrying out a strategy to address priority needs

Priority needs in the plan are addressed by the entities listed in the table above. Services and programs that help to meet these and other needs are also provided by many local agencies. Gaps in providing programs or services that meet the priority needs will be evaluated on an annual basis, but at the onset of this planning cycle, there are no identified gaps to implementation.

SP-45 Goals Summary – 91.215(a)(4)

Goals Summary Information

Sort Order	Goal Name	Start Year	End Year	Category	Needs Addressed	Funding	Goal Outcome Indicator
1	Affordable Housing Development	2019	2023	Affordable Housing	Affordable Housing	CDBG: \$2,000,000 HOME: \$1,425,000	Rental units constructed: 100 Household Housing Unit Homeowner Housing Added: 5 Household Housing Unit
2	Housing Rehabilitation and Reconstruction	2019	2023	Affordable Housing	Affordable Housing	CDBG: \$2,640,000	Rental units rehabilitated: 20 Household Housing Unit Homeowner Housing Rehabilitated: 198 Household Housing Unit
3	Down Payment Assistance	2019	2023	Affordable Housing	Affordable Housing	HOME: \$1,800,000 State Housing Initiative Partnership (SHIP): \$400,000	Direct Financial Assistance to Homebuyers: 111 Households Assisted
4	Housing and Services for Persons who are Homeless	2019	2023	Homeless	Housing and Services for the Homeless	CDBG: \$100,000 HOME: \$1,375,000 ESG: \$1,276,485	Public service activities other than Low/Moderate Income Housing Benefit: 2125 Persons Assisted Tenant-based rental assistance / Rapid Rehousing: 315 Households Assisted
5	Public Services for Community Revitalization	2019	2023	Non-Housing Community Development	Community Revitalization	CDBG: \$1,120,000	Public service activities other than Low/Moderate Income Housing Benefit: 9495 Persons Assisted

Sort Order	Goal Name	Start Year	End Year	Category	Needs Addressed	Funding	Goal Outcome Indicator
6	Infrastructure Improvements	2019	2023	Non-Housing Community Development	Community Revitalization	CDBG: \$4,750,000	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 10000 Persons Assisted
7	Economic Development	2019	2023	Non-Housing Community Development	Economic Development	CDBG: \$0	Businesses assisted: 1 Businesses Assisted
8	Public Facility Improvements	2019	2023	Non-Homeless Special Needs	Public Facility Improvements	CDBG: \$1,250,000	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 5 Persons Assisted

Table 53 – Goals Summary

Goal Descriptions

1	Goal Name	Affordable Housing Development
	Goal Description	The development of affordable housing will be completed through sub recipient agreements with non-profit organizations using HOME and/or CDBG funds. Units may be added through new construction, acquisition, and/or acquisition and rehabilitation, as allowable by 24 CFR Part 92 and 24 CFR 570, respectively. Funding estimates are based on an average of \$400,000 in CDBG funding per year for five years, \$145,000 in HOME-CHDO funds per year for five years, and \$140,000 in non-CHDO HOME funds per year for five years.
2	Goal Name	Housing Rehabilitation and Reconstruction
	Goal Description	<p>Housing rehabilitation and reconstruction will be completed by HVS using CDBG funds. The City of Sanibel will also carry out rehabilitation activities for affordable rental housing located on the island. Funding estimate is based on an average of \$500,000 in CDBG administered by HVS, and \$28,000 administered by the City of Sanibel per year for five years. Goal outcome indicators are based on the rehabilitation of 20 units by the City of Sanibel and the following anticipated outcomes for HVS:</p> <ul style="list-style-type: none"> • Year 1 30 homes rehabilitated 0 homes reconstructed • Year 2 35 homes rehabilitated 1 homes reconstructed • Year 3 40 homes rehabilitated 1 homes reconstructed • Year 4 42 homes rehabilitated 2 homes reconstructed • Year 5 45 homes rehabilitated 2 homes reconstructed

3	Goal Name	Down Payment Assistance
	Goal Description	<p>Down payment assistance (DPA) will be provided by HVS through HOME and SHIP funding. Funding estimate is based on an average allocation of \$360,000 in HOME funds per year for five years. SHIP funding estimates are based on the current annual awarded amount multiplied by five. Households anticipated to be assisted through SHIP DPA are not included here within, but will be reported to funders through other reports. Goal outcome indicators are based on the following anticipated outcomes:</p> <ul style="list-style-type: none"> • Year 1 18 homebuyers assisted • Year 2 22 homebuyers assisted • Year 3 26 homebuyers assisted • Year 4 20 homebuyers assisted • Year 5 25 homebuyers assisted
4	Goal Name	Housing and Services for Persons who are Homeless
	Goal Description	<p>Housing and services for persons who are homeless will be provided through sub recipient agreements and by Human and Veteran Services (HVS). Housing and services provided by HVS will include rapid rehousing through ESG funds, and tenant based rental assistance through HOME funds. Sub-recipients will provide overnight shelter at the Bob Janes through ESG funds, and the coordination services through CDBG funds. Additional housing and services will be provided through CoC, State Unified Homelessness, SHIP, HOPWA, LIHEAP and general funds. Funding estimates are based on an average of \$20,000 in CDBG funding per year for five years, \$200,000 in HOME TBRA plus an estimated \$75,000 in HOME program income funds per year for five years, and \$255,297 in ESG funds per year for five years. Other funding estimates are based on the current annual awarded amount multiplied by five.</p> <p>Goal outcome indicator estimates are based on 26 households per year served with HOME TBRA funds, 37 households per year served with ESG rapid re-housing funds, and 425 persons being served through homeless services coordination. Households anticipated to be assisted through CoC, State Unified Homelessness, SHIP, HOPWA, LIHEAP and general funds are not included here within, but will be reported to HUD and other funders through other reports</p>

5	Goal Name	Public Services for Community Revitalization
	Goal Description	<p>Two local target areas have been identified for the provision of concentrated public services and housing improvements. Proposed activities will primarily benefit the Suncoast Estates, Palmona Park, Pine Manor and Page Park neighborhoods, which are low- and moderate- income area. In addition to public services being provided by HVS, the Town of Fort Myers Beach plans to use CDBG funds to administer a youth program to income eligible youth within the Town during the first year of the plan. The Town of Fort Myers Beach has notified Lee County that is will not participate in the Urban County partnership after the expiration of the current term, in HUD program year 2020.</p> <p>Funding estimate is based on the allocation of approximately \$200,000 in CDBG administered by HVS, and \$24,000 administered by the Town of Fort Myers Beach per year for five years.</p> <p>Goal outcome indicators for public services administered by HVS are based on an estimate that 20% of residents in the identified low- and moderate-income target areas will benefit from public services each year for 5 years, resulting in approximately 1,895 persons benefiting per year or 9,475 over the five-year period. Goal outcome indicates for public services administered by the Town of Fort Myers Beach are based on an estimated 20 youth per year for 1 year (HUD program year 2019).</p> <p>Funding and goal outcome indicators for housing rehabilitation and reconstruction completed in these areas are reflected in the Housing Rehabilitation and Reconstruction goal.</p>
6	Goal Name	Infrastructure Improvements
	Goal Description	<p>Improvements to public facilities and infrastructure will include the create of new multi-use paths and pedestrian walk-ways in low- and moderate- income target areas. Activities undertaken within this goal will be administer by HVS and the City of Bonita Springs. Activities carried out by the City of Bonita Springs will only be within low- and moderate- income areas within the City limits.</p> <p>Funding estimates are based on an average allocation of CDBG funds in the amount of \$600,000 for infrastructure project administered by HVS and \$323,104 for the City of Bonita Springs per year for five years. Goal outcome indicators as based on the low- and moderate income populations in the target areas.</p>
7	Goal Name	Economic Development
	Goal Description	<p>Economic development activities may include special economic development initiatives or microenterprise assistance. Economic development activities are not currently planned for year 1 of this plan, but may be carried out in subsequent years. Funding estimates and goal outcome indicators will be provided as projects are selected annually.</p>

8	Goal Name	Public Facility Improvements
	Goal Description	<p>Improvements to public facilities assistance to make necessary improvements and expansions to facilities owned by non-profit organizations.</p> <p>Funding estimates are based on an average allocation of CDBG funds for \$250,000 for public facilities improvements administered by HVS. Goal outcome indicators as based on the number of non-profits who will assisted with public facility improvements.</p>

Estimate the number of extremely low-income, low-income, and moderate-income families to whom the jurisdiction will provide affordable housing as defined by HOME 91.315(b)(2)

Down payment assistance programs are anticipated to assist 2 extremely low-income, 9 low-income, and 100 moderate-income households over the 5-year period. HOME Tenant Based Rental Assistance activities are anticipated to assist 17 extremely low-income and 3 low-income households annually.

SP-50 Public Housing Accessibility and Involvement – 91.215(c)

Need to Increase the Number of Accessible Units (if Required by a Section 504 Voluntary Compliance Agreement)

The PHA reported that most applicants do not answer questions regarding accessibility needs. The most common needs are basic handrails in the bathroom, ramps for the door and basic items that HACFM can provide quickly. There have only been two issues in the past 13 years, in which a resident requested accessible features that HACFM was unable to accommodate due to it creating hardship for the development. HACFM did recommend that the resident contact Builder's Care, a local non-profit agency, to get assistance. The accommodation was paid for and completed by Builder's Care.

Activities to Increase Resident Involvements

HACFM has an established Family Self Sufficiency (FSS) program in place for all residents to participate in. An Elderly Service Coordinator plans daily/weekly/monthly activities for their senior residents. HACFM regularly involves residents in the planning of future development activities through resident meetings, which are held to gather input regarding new developments, including the opportunity to request amenities, outdoor activities for children, colors, floor type, etc... Residents are always encouraged to attend monthly resident meetings, which are held at all developments to encourage resident involvement.

Is the public housing agency designated as troubled under 24 CFR part 902?

No

Plan to remove the 'troubled' designation

Neither PHA is currently listed as troubled.

SP-55 Barriers to affordable housing – 91.215(h)

Barriers to Affordable Housing

There are no identified public policies that negatively affect affordable housing and residential investment. The current Analysis of Impediments to Fair Housing for Lee County found a number of local barriers. Barriers included discrimination based on race, national origin, and/or disability; loan application denial rates have been lower for Caucasian applicants than other races/ethnicities, opposition to public housing development, insufficient accessible housing units, insufficient transportation system, and inequitable geographic distribution of public housing units. Plan goals and projects will attempt to address these barriers. An example of such a project may include housing rehabilitation, where the scope of work may address the accessibility of a unit.

Strategy to Remove or Ameliorate the Barriers to Affordable Housing

The Analysis of Impediments to Fair Housing Choice outlines goals and projects will attempt to remove or ameliorate barriers to fair housing. Barriers to affordable housing will be addressed through the implementation of the housing programs outlined throughout this plan. Partnership between the County, HACFM and non-profit housing development organizations will promote the development of public and affordable housing units away from the central location of many other units in Fort Myers. Future collaboration on affordable housing projects are anticipated to add new and preserve existing affordable housing units throughout Lee County.

SP-60 Homelessness Strategy – 91.215(d)

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

Much of the outreach to homeless persons is conducted at community events such as the Point in Time Count and the Stand Down/Service Day, and by the many caseworkers at community agencies including, the U.S. Department of Veterans Affairs, the Lee County Homeless Coalition, schools, and other entities that encounter individuals and families who are homeless during service delivery or during their regular course of business. The Continuum of Care has also developed and implemented a coordinated assessment process to better address needs, target resources, and ensure engagement with services are more efficient for persons who are homeless. Needs are assessed through the coordinated assessment process during various points of contact at community agencies and through outreach events. Lee County Human and Veteran Services recently implemented a street outreach program that focuses on engaging persons experiencing unsheltered homelessness, completing Coordinated Assessment, and linking those persons with housing and supportive services.

There are also specific events held throughout the year to raise awareness and promote outreach to persons who are homeless. Such events include the annual Candlelight Vigil, Homeless Challenge, and Community Conversations. In addition, the Lee County Homeless Coalition and Lee County Continuum of Care work together to facilitate ongoing community engagement through one-on-one meetings with elected officials and other community leaders.

Addressing the emergency and transitional housing needs of homeless persons

The provision of emergency shelter at the Bob Janes Triage Center and Low Demand Shelter helps to address some of the needs of individuals who are homeless. The HOME Tenant Based Rental Assistance program also supports the housing needs of individuals and families who are homeless, by providing a permanent housing solution instead of emergency shelter. As additional funding sources become available, Lee County may engage other community partners for the development of additional projects or programs. Emergency shelter and transitional housing needs may also be addressed through grant funding opportunities, such as the competitive Continuum of Care process, and through other state or local funding streams.

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 plan's goals of providing homeless housing and services will help to prevent homelessness, re-house, or otherwise permanently house persons who are homeless. The Lee County Continuum of Care has established written standards for prioritization to ensure that persons with especially high needs are linked with adequate housing and supportive services. Additionally, the implementation of the coordinated entry process ensures that persons who are homeless are rapidly linked with appropriate housing resources and support. Ongoing collaboration between service providers and the Continuum of Care, and frequent reviews of HMIS data facilitate the implementation of strategies to reduce the length of time a person experiences homelessness.

These goals will be supported using ESG funding to engage and rapidly re-house persons who are homeless. Other than the funds available through this process, permanent housing needs may be addressed through other resources identified elsewhere in this plan, and through other grant funding opportunities, such as the competitive Continuum of Care process, and through other state or local funding streams.

Help low-income individuals and families avoid becoming homeless, especially extremely low-income individuals and families who are likely to become homeless after being discharged from a publicly funded institution or system of care, or who are receiving assistance from public and private agencies that address housing, health, social services, employment, education or youth needs

Human and Veteran Services and other local agencies provide many programs and services aimed at preventing homelessness and stabilizing clients. These programs include job training, job readiness, financial management courses, and active case management. Several homelessness prevention programs, active throughout the County, provide assistance with rent and utilities to ensure that persons who are extremely low-income do not become homeless. These programs have streamlined the application, assistance, and referral process for persons who are homeless by participating in the coordinated entry process implemented by the Continuum of Care.

In addition, discharge planning agreements are in place with the local foster care agency, mental health and substance abuse provider, jail, and hospital. These agencies refer clients to appropriate service and housing providers to ensure that they are not discharged into homelessness.

SP-65 Lead based paint Hazards – 91.215(i)

Actions to address LBP hazards and increase access to housing without LBP hazards

2011-2015 CHAS data indicates that there are 63,380 units in Lee County which were build prior to 1979, of those 6374 units are occupied by families with children under the age of 6.

The Lee County Department of Health indicated that 49 children tested with elevated blood lead levels in 2017. The same year, the state lowered the threshold for the definition of elevated blood lead levels, from 10 µg/dL to 5 µg/dL, following national recommendations from the CDC. This data change causes the number of cases to appear higher in 2017, but the changed metrics prevent comparison to years prior to 2017. The rate of positive lead tests in Lee County is 7 per 100,000 persons, indicating that lead based paint related problems in Lee County are minor in comparison to other areas, which have older housing stock.

Lee County will continue to ensure that Lead Based Paint protocols are followed, as required by 24 CFR Part 35. For homes built prior to 1978, a LBP inspection and clearance report conducted by an EPA certified inspector or risk assessor indicating a lead-based paint hazard free home is required. Lead-Based Paint Notification shall include: The Lead Hazard Information Pamphlet; Appropriate LBP Disclosure Form; Notice of Lead Hazard Evaluation; and notice of the results of any Lead Hazard Reduction Activities conducted on the property. HUD Lead Based Paint Guidelines are issued pursuant to Section 1017 of the residential Lead-Based Paint Hazard Reduction Act of 1992, which is often referred to as Title X (“Title Ten”) because it was enacted as Title X of the Housing and Community Development Act of 1992 (Public Law 102-550). The Guidelines are based on the concepts, definitions and requirements set forth by Congress in Title X.

Continued development of new housing units and rehabilitation to existing units will increase access to housing without hazards.

How are the actions listed above related to the extent of lead poisoning and hazards?

Due to the low incidence of poisoning cases, actions taken may help to lower cases, but due to the low number of homes built prior to 1978 overall impacts will be minor.

How are the actions listed above integrated into housing policies and procedures?

Activities in homes built before 1978 must be tested, except when the rehabilitation will not disturb any painted surface, like replacing a drain field. For rehabilitation activities less than \$5,000, a lead swipe test can be conducted. If lead is found, rehab must be done using lead safe work practices. For activities at \$5,000 or more, a lead test must be completed along with a risk assessment.

SP-70 Anti-Poverty Strategy – 91.215(j)

Jurisdiction Goals, Programs and Policies for reducing the number of Poverty-Level Families

There are many antipoverty programs implemented by numerous agencies in Lee County. Antipoverty impacts are inherent in the county's programs in housing, neighborhood development and elimination of homelessness. The goal of Lee County's antipoverty strategies is to help individuals and families rise above the poverty level, become self-sufficient, and eliminate systemic barriers to success. To achieve this goal, Lee County, in conjunction with city, state, regional and federal agencies, and with non-profit following categories: Activities for Children & Youth, Supportive Living and Emergency Assistance. All programs address issues to assist in reducing poverty and assisting low/moderate income households.

Lee County Human and Veteran Services supports anti-poverty programs of non-profit social service agencies with county general funds through the Partnering for Results Program. Lee County has budgeted \$4,743,971, to support programs, which provide a variety of anti-poverty services in the following categories: Children & Youth Programs and other Supportive Living type services. All programs address issues to assist in reducing poverty and assisting low/moderate income households. Beginning 10/01/18, 44 programs were funded within 32 agencies in the following categories: 28 programs providing Children & Youth services and 16 providing Supportive Living services.

Human and Veteran Services provides anti-poverty action in its neighborhood building program area by working with the neighborhoods to coordinate resources for employment and self-sufficiency programs. Antipoverty efforts of the Family Self-Sufficiency program area consist of homeless programs, emergency assistance (rental, mortgage and utility payments), housing and financial counseling, case management, and educational services. Such programs include a financial literacy education program for families participating in homeless prevention and rehousing programs, and a soft skills employment-training program. Educational services are funded by the Community Services Block Grant, and aim to increase self-sufficiency and upward job mobility for low-income households. Participants maintain close contact with case management staff and receive individual supportive services if necessary to ensure successful completion of the programs and long-term self-sufficiency. Additional antipoverty efforts include funding state mandated programs for substance abuse, mental health, Medicaid, and indigent medical care. Lee County provides additional funds, beyond the state requirements, to increase levels of services, including funding for specialty courts, such as Drug and Veteran's Mental Health Courts.

How are the Jurisdiction poverty reducing goals, programs, and policies coordinated with this affordable housing plan

Anti-poverty programs, especially those being carried out in local target areas, will coordinate with the affordable housing programs outlined here within. Public comments indicate a significant need for additional affordable housing units. Lee County intends to undertake multiple projects to facilitate the development of additional affordable housing units. Actions planned include using CDBG, HOME, and state funds to provide owner occupied housing rehabilitation assistance and down payment assistance. In addition, HOME funds are being allocated for tenant based rental assistance and CHDO and Non-CHDO

housing development to facilitate the development of additional affordable housing units. Lee County has implemented the HOPWA Tenant Based Rental Assistance Program (TBRA), which is projected to house the most vulnerable HIV/AIDS households. These housing services are delivered in coordination with case management, financial literacy classes, and job skills training to ensure that households maintain stable housing upon program completion.

SP-80 Monitoring – 91.230

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

Human & Veteran Services (HVS) staff monitor all contracts on an ongoing basis to inspect, review and report on the agency's compliance with the terms and conditions of the contract, to ensure satisfactory performance. Contracts for HUD-funded projects are reviewed to ensure long-term compliance with program and comprehensive planning requirements. Monitoring is an ongoing process involving continuous communication and evaluation. The process involves frequent telephone/email contact, analysis of reports and audits, and periodic meetings. Contract staff keep fully informed concerning sub-recipient compliance with program requirements and the extent to which technical assistance is needed. As part of this process, staff are alert for fraud, waste, mismanagement or situations with potential for such abuse. Monitoring also provides opportunities to identify program participant accomplishments as well as successful techniques that might be replicated by other sub-recipients.

Monitoring activities may include:

- Review/validation of payment requests (invoices) and supporting documentation.
- Review of program/beneficiary reports and Independent Financial audits (CPA).
- Review of monitoring reports from other funders, which are pertinent to the contracted program.
- Tracking and receipt of other contract deliverables including Section 3, Davis Bacon and other federal requirements.
- On site monitoring and follow up visits as needed (may be scheduled or unscheduled). An onsite may be necessary to clarify/validate information obtained from review of reports, audits, etc. and other applicable regulations. On-site monitoring will take place during the term of the contract or within 30 days of contract expiration.
- Technical Assistance
- Summarization of monitoring activities or desk review.

Scheduling is prioritized according to the following considerations:

- Complexity and schedule of program/project.
- Size of award, spending pattern and duration of award.
- Agency's prior experience.

- Changes in key personnel.
- Timeliness and accuracy of reporting.
- Previous monitoring issues.

Reviews will address components as applicable for funding source:

- Funding/Program Requirements
- Financial: Timely spending, utilization of funds and match requirements
- Capacity and numbers served
- File Review and Eligibility Compliance.
- A random selection of client files will be selected for review using a targeted goal of reviewing at least 10% of clients served (minimum 10, maximum 50 files).
- Program guidelines and monitoring tools for State or Federally funded projects shall be referenced for additional monitoring requirements.
- Performance Measures/Outcomes
- Prior monitoring issues
- Compliance Issues
- Observation of facility and/or interviews
- Timely submission of Contract Deliverables
- Equipment/Asset Inventory
- Personnel Review
- Policies/Procedure Review
- Record Keeping

A written report is prepared annually for all contracts. If when writing the report, it is discovered, that information is questionable or missing, an attempt can be made to contact the agency to resolve the discrepancy. If the discrepancy and or questions cannot be resolved prior to the issuance of the report, they should be included in the report as either a finding or concern depending on the severity of the issue. The annual report is emailed to the agency Director and copied to the Board Chair no later than 90 days following the end of contract term. If there is a finding or a concern, a Corrective Action Plan response is due within 30 days from issuance of the report.

Expected Resources

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

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Available Remainder of ConPlan	Narrative Description
			Annual Allocation	Program Income	Prior Year Funds	Total		
CDBG	public - federal	Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services	3,047,518	20,000	0	3,067,518	15,337,590	CDBG funds will be used in accordance with 24 CFR 570 and this Consolidated Plan to further address community development, housing, and homeless needs in Lee County.
HOME	public - federal	Acquisition Homebuyer assistance Homeowner rehab Multifamily rental new construction Multifamily rental rehab New construction for ownership TBRA	938,598	75,000	0	1,013,598	5,067,990	HOME funds will be used in accordance with 24 CFR 92 and this Consolidated Plan to address housing needs in Lee County.

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Available Remainder of ConPlan	Narrative Description
			Annual Allocation	Program Income	Prior Year Funds	Total		
ESG	public - federal	Conversion and rehab for transitional housing Financial Assistance Overnight shelter Rapid re-housing (rental assistance) Rental Assistance Services Transitional housing	255,297	0	0	255,297	1,276,485	ESG funds will be used in accordance with 24 CFR 576 and this Consolidated Plan to provide housing and services to persons experiencing homelessness in Lee County.
Continuum of Care	public - federal	Admin and Planning Financial Assistance Housing Public Services Rapid re-housing (rental assistance) Rental Assistance Services TBRA Transitional housing	1,835,581	0	0	1,835,581	9,177,905	Lee County is the Collaborative Applicant for the Continuum of Care. Legacy Shelter Plus Care and Supportive Housing Program (now Continuum of Care) funds are used by Community Assisted and Supported Living to provide Permanent Supportive Housing, the Salvation Army uses funds for rapid re-housing for families, and the Lee County Housing Development Corporation uses funds for rapid re-housing for victims of domestic violence.
General Fund	public - local	Admin and Planning Financial Assistance Overnight shelter Public Services Rapid re-housing (rental assistance) Rental Assistance Services	5,508,522	0	0	5,508,522	27,542,610	General funds dollars are allocated to support Partnering for Results programs (\$4,743,971), the Bob Janes Triage Center (\$571,301), and housing and services for persons who are homeless (\$193,250).

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Available Remainder of ConPlan	Narrative Description
			Annual Allocation	Program Income	Prior Year Funds	Total		
Other	public - state	Admin and Planning Financial Assistance Housing Public Services Rapid re-housing (rental assistance) Rental Assistance Services	300,607	0	0	300,607	901,821	Funds are awarded through a competitive process conducted by the Florida Department of Children and Families' Office on Homelessness. In the 2019-2022 funding competition, Lee County was awarded \$300,607 in grant funds to administer Secure Paths, a safe parking and permanent housing program, the Outreach Project, a project aimed at engaging persons living unsheltered in Lee County, and to contract with Lee County Housing Development Corporation to administer a homelessness prevention program.
Other	public - state	Admin and Planning Financial Assistance Rental Assistance Services TBRA	157,648	0	0	157,648	788,240	HOPWA funds are provided to HVS through the State and Department of Health. Funds are used to provide tenant based rental assistance and intensive case management for persons with HIV/AIDS who are experiencing homelessness.
Other	public - state	Admin and Planning Financial Assistance Services	1,329,144	0	0	1,329,144	6,645,720	LIHEAP funds are provided to HVS through the Florida Department of Economic Opportunity to assist low-income persons with electricity expenses.
Other	public - state	Admin and Planning Homebuyer assistance Housing Rapid re-housing (rental assistance) Rental Assistance	218,807	0	0	218,807	1,094,035	SHIP funds are awarded to Lee County Department of Community Development. Portions of funds are passed through to Lee County Human and Veteran Services for the administration of down payment assistance and homelessness prevention programs.

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Available Remainder of ConPlan	Narrative Description
			Annual Allocation	Program Income	Prior Year Funds	Total		
Other	public - state	Admin and Planning Housing Public Services Rapid re-housing (rental assistance) Rental Assistance Services	467,142	0	0	467,142	2,335,710	Community Services Block Grant funds are used for homeless prevention, re-housing programs, financial literacy and job training.

Table 54 - Expected Resources – Priority Table

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

Federal funds will leverage other funds by referring identified at-risk households or homeless households to appropriate programs for prevention or re-housing. Services provides are funded with Lee County General funds, Continuum of Care programs, HOPWA and CSBG. Additionally, State SHIP funds are used to assist low-income persons with down payment assistance, and provide match for HOME funded projects. ESG will be matched with County General funds, as well as other resources documented by sub-recipients. Some CDBG funds will be concentrated on neighborhood revitalization, and will be used in the targeted areas noted in this Consolidated Plan. These funds will be leveraged with private funds gathered by neighborhood organizations through fundraising.

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

There are no publicly owned lands or properties that are currently identified for projects in this plan.

Annual Goals and Objectives

AP-20 Annual Goals and Objectives

Goals Summary Information

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	Affordable Housing Development	2019	2023	Affordable Housing		Affordable Housing	CDBG: \$416,232 HOME: \$285,098	Rental units constructed: 1 Household Housing Unit Homeowner Housing Added: 1 Household Housing Unit
2	Housing Rehabilitation and Reconstruction	2019	2023	Affordable Housing		Affordable Housing	CDBG: \$531,613	Rental units rehabilitated: 20 Household Housing Unit Homeowner Housing Rehabilitated: 50 Household Housing Unit
3	Down Payment Assistance	2019	2023	Affordable Housing		Affordable Housing	HOME: \$360,000	Direct Financial Assistance to Homebuyers: 18 Households Assisted
4	Housing and Services for Persons who are Homeless	2019	2023	Homeless		Housing and Services for the Homeless	CDBG: \$20,000 HOME: \$275,000 ESG: \$255,297	Public service activities other than Low/Moderate Income Housing Benefit: 425 Persons Assisted Tenant-based rental assistance / Rapid Rehousing: 63 Households Assisted
5	Public Services for Community Revitalization	2019	2023	Non-Housing Community Development	North Fort Myers Central Fort Myers	Community Revitalization	CDBG: \$223,936	Public service activities other than Low/Moderate Income Housing Benefit: 1915 Persons Assisted
6	Infrastructure Improvements	2019	2023	Non-Housing Community Development	North Fort Myers Central Fort Myers	Community Revitalization	CDBG: \$916,981	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 1000 Persons Assisted

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
7	Public Facility Improvements	2019	2023	Non-Homeless Special Needs		Public Facility Improvements	CDBG: \$250,000	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 1 Persons Assisted

Table 55 – Goals Summary

Goal Descriptions

1	Goal Name	Affordable Housing Development
	Goal Description	The development of affordable housing will be completed through sub recipient agreements with non-profit organizations using HOME and/or CDBG funds. Units may be added through new construction, acquisition, and/or acquisition and rehabilitation, as allowable by 24 CFR Part 92 and 24 CFR 570, respectively. Funding allocated includes \$416,232 in CDBG funding, \$145,000 in HOME-CHDO funds, and \$140,098 in non-CHDO HOME funds.
2	Goal Name	Housing Rehabilitation and Reconstruction
	Goal Description	Housing rehabilitation and reconstruction will be completed by HVS using CDBG funds. The City of Sanibel will also carry out rehabilitation activities for affordable rental housing located on the island. Funding allocated for this goal is \$510,000 in CDBG administered by HVS, and \$21,613 administered by the City of Sanibel. Goal outcome indicators are based on the rehabilitation of 20 units by the City of Sanibel and 30 owner occupied units by HVS.
3	Goal Name	Down Payment Assistance
	Goal Description	Down payment assistance (DPA) will be provided by HVS through HOME and SHIP funding. Funding allocated for this goal includes \$360,000 in HOME funds. Households anticipated to be assisted through SHIP DPA are not included here within, but will be reported to funders through other reports. Goal outcome indicators are anticipated to be as follows: 18 homebuyers assisted.

<p>4</p>	<p>Goal Name</p>	<p>Housing and Services for Persons who are Homeless</p>
	<p>Goal Description</p>	<p>Housing and services for persons who are homeless will be provided through sub recipient agreements and by Human and Veteran Services (HVS). Housing and services provided by HVS will include rapid rehousing through ESG funds, and tenant based rental assistance through HOME funds. Sub-recipients will provide overnight shelter at the Bob Janes through ESG funds, and the coordination services through CDBG funds.</p> <p>Additional housing and services will be provided through CoC, State Unified Homelessness, SHIP, HOPWA, LIHEAP and general funds. Funding allocations and households anticipated to be assisted through CoC, State Unified Homelessness, SHIP, HOPWA, LIHEAP and general funds are not included here within, but will be reported to HUD and other funders through other reports.</p> <p>Funding allocations are \$20,000 in CDBG funding, \$200,000 in HOME TBRA plus an estimated \$75,000 in HOME program income funds, and \$255,297 in ESG funds. Goal outcome indicator estimates are 26 households per year served with HOME TBRA funds, 12 households per year served with ESG rapid re-housing funds through Lee County Human and Veteran Services, 25 households per year served with ESG rapid re-housing funds through the Bob Janes Triage Center, and 425 persons being served through homeless services coordination.</p>
<p>5</p>	<p>Goal Name</p>	<p>Public Services for Community Revitalization</p>
	<p>Goal Description</p>	<p>Two local target areas have been identified for the provision of concentrated public services and housing improvements. Proposed activities will primarily benefit the Suncoast, Palmona Park, Pine Manor and Page Park neighborhoods, which are low- and moderate-income area. In addition to public services being provided by HVS, the Town of Fort Myers Beach plans to use CDBG funds to administer a youth program to income eligible youth within the Town during the first year of the plan. The Town of Fort Myers Beach has notified Lee County that it will not participate in the Urban County partnership after the expiration of the current term, in HUD program year 2020.</p> <p>Funding estimate is based on the allocation of approximately \$200,000 in CDBG administered by HVS, and \$24,000 administered by the Town of Fort Myers Beach per year for five years.</p> <p>Goal outcome indicators for public services administered by HVS are based on an estimate that 20% of residents in the identified low- and moderate-income target areas will benefit from public services each year, resulting in approximately 1,895 persons benefiting per year. Goal outcome indicators for public services administered by the Town of Fort Myers Beach are based on an estimated 20 youth per year for 1 year (HUD program year 2019).</p> <p>Funding and goal outcome indicators for housing rehabilitation and reconstruction completed in these areas are reflected in the Housing Rehabilitation and Reconstruction goal.</p>

6	Goal Name	Infrastructure Improvements
	Goal Description	<p>Improvements to public facilities and infrastructure will include the create of new multi-use paths and pedestrian walk-ways in low- and moderate- income target areas. Activities undertaken within this goal will be administer by HVS and the City of Bonita Springs. Activities carried out by the City of Bonita Springs will only be within low- and moderate-income areas within the City limits.</p> <p>Funding allocations are \$615,000 in CDBG funds for infrastructure project administered by HVS and \$323,104 in CDBG funds for the City of Bonita Springs.</p> <p>Goal outcome indicators as based on the low- and moderate income populations in the target areas.</p>
7	Goal Name	Public Facility Improvements
	Goal Description	<p>Improvements to public facilities to make necessary improvements and expansions to facilities owned by non-profit organizations.</p> <p>Funding estimates are based on an average allocation of CDBG funds for \$250,000 for public facilities improvements administered by HVS.</p> <p>Goal outcome indicators as based on the number of non-profits who will be assisted with public facility improvements.</p>

Projects

AP-35 Projects – 91.220(d)

Lee County anticipates completing 17 projects in Program Year 2019-2020.

#	Project Name
1	CDBG Housing Delivery
2	CDBG Housing Rehabilitation and Reconstruction
3	CDBG Homeless Coalition Coordination
4	CDBG Bonita Springs Public Facilities
5	CDBG Fort Myers Beach Public Services
6	CDBG Sanibel Rental Rehabilitation
7	CDBG Program Administration
8	CDBG Urban County Administration
9	CDBG Community Infrastructure
10	CDBG Community Public Services
11	CDBG Non-Profit Capital Improvement
12	CDBG/HOME Non-Profit Housing Development
13	HOME Project Delivery
14	HOME Down Payment Assistance
15	HOME CHDO Housing Development
16	HOME Tenant Based Rental Assistance
17	ESG19 Lee County

Table 56 – Project Information

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

Lee County determined the allocation for each project through the evaluation of past program performance, staff recommendations, and public input received during the citizen participation and consultation process.

Public comments indicate a significant need for additional affordable housing units. Lee County intends to undertake multiple projects to facilitate the development of additional affordable housing units. Obstacles to these projects may include limited availability of units to be acquired or rehabilitated, and limited resources available to complete projects. Lee County will ensure that identified units are suitable for affordable housing development through underwriting, and coordination with community partners and other county departments, as required.

AP-38 Project Summary

1	Project Name	CDBG Housing Delivery
	Goals Supported	Affordable Housing Development
	Needs Addressed	Affordable Housing
	Funding	CDBG: \$290,000
	Description	The project is in support of the CDBG Housing Rehabilitation and Reconstruction program. Funds will be used to pay for staff salary and soft costs associated with housing rehabilitation and reconstruction projects.
	Target Date	9/30/2020
	Estimate the number and type of families that will benefit from the proposed activities	Beneficiaries will be reported in the activities for the owner occupied housing rehabilitation program.
	Location Description	This project will be undertaken in association with the housing rehabilitation and reconstruction program in target areas, as well as in unincorporated areas of Lee County.
	Planned Activities	The project is in support of the CDBG Housing Rehabilitation and Reconstruction program. Funds will be used to pay for staff salary and soft costs associated with housing rehabilitation and reconstruction projects.
2	Project Name	CDBG Housing Rehabilitation and Reconstruction
	Goals Supported	Housing Rehabilitation and Reconstruction
	Needs Addressed	Affordable Housing
	Funding	CDBG: \$510,000
	Description	Rehabilitation and reconstruction housing units in Lee County. Rehabilitations will continue to be completed in target areas, as well as non-target areas, of Lee County. Funds will be used to pay for construction costs associated with housing rehabilitation and reconstruction.
	Target Date	9/30/2020
	Estimate the number and type of families that will benefit from the proposed activities	It is estimated that 30 households will benefit from the proposed project.
	Location Description	This project will be undertaken in target areas as well as unincorporated areas of Lee County.
	Planned Activities	Rehabilitation and reconstruction housing units in Lee County. Rehabilitations will continue to be completed in target areas, as well as non-target areas, of Lee County. Funds will be used to pay for construction costs associated with housing rehabilitation and reconstruction.
	Project Name	CDBG Homeless Coalition Coordination

3	Goals Supported	Housing and Services for Persons who are Homeless
	Needs Addressed	Housing and Services for the Homeless
	Funding	CDBG: \$20,000
	Description	This project consists of public services provided to persons experiencing homelessness in Lee County. Services include an annual homeless services day and production of a resource guide. Services will be carried out by the Lee County Homeless Coalition.
	Target Date	9/30/2020
	Estimate the number and type of families that will benefit from the proposed activities	It is estimated that 425 persons who are homeless will benefit from this project.
	Location Description	The public service activities undertaken in this project will be carried out by the Lee County Homeless Coalition in Fort Myers, FL, and will be available to all persons experiencing homelessness in Lee County.
	Planned Activities	This project consists of public services supporting persons who are homeless in Lee County, including support for the Lee County Homeless Coalition in the preparation and execution of the annual homeless services day, provision of a community-wide resource guide, and planning and preparation of other events and resources.
	4	Project Name
Goals Supported		Infrastructure Improvements
Needs Addressed		Community Revitalization
Funding		CDBG: \$323,104
Description		This project will involve construction or rehabilitation of public facilities in Bonita Springs, primarily multi-use paths and low- and moderate-income areas within Bonita Springs.
Target Date		9/30/2020
Estimate the number and type of families that will benefit from the proposed activities		It is estimated that 1,000 low- and moderate- income persons will benefit from this project.
Location Description		This project will be undertaken within low- and moderate-income areas with the limits of the City of Bonita Springs.
Planned Activities		This project will involve construction or rehabilitation of public facilities in Bonita Springs, primarily multi-use paths and low- and moderate-income areas within Bonita Springs.
5	Project Name	CDBG Fort Myers Beach Public Services
	Goals Supported	Public Services for Community Revitalization
	Needs Addressed	Community Revitalization

	Funding	CDBG: \$35,617
	Description	This project will include the provision of public services to youth in Fort Myers Beach.
	Target Date	9/30/2020
	Estimate the number and type of families that will benefit from the proposed activities	The town estimates that 20 youth will benefit from this project.
	Location Description	This project will be undertaken within the limits of the Town of Fort Myers Beach.
	Planned Activities	This project will include the provision of after school and summer camp programs for youth in Fort Myers Beach.
6	Project Name	CDBG Sanibel Rental Rehabilitation
	Goals Supported	Housing Rehabilitation and Reconstruction
	Needs Addressed	Affordable Housing
	Funding	CDBG: \$29,548
	Description	The project will consist of the rehabilitation of affordable rental housing units located within the City of Sanibel.
	Target Date	9/30/2020
	Estimate the number and type of families that will benefit from the proposed activities	It is estimated that 5 housing units will benefit from the proposed activities.
	Location Description	This project will be undertaken within the limits of the City of Sanibel.
	Planned Activities	The project will consist of the rehabilitation of affordable rental housing units located within the City of Sanibel.
7	Project Name	CDBG Program Administration
	Goals Supported	Affordable Housing Development Housing Rehabilitation and Reconstruction Down Payment Assistance Housing and Services for Persons who are Homeless Public Services for Community Revitalization Infrastructure Improvements Public Facility Improvements
	Needs Addressed	Affordable Housing Housing and Services for the Homeless Public Facility Improvements Economic Development Community Revitalization
	Funding	CDBG: \$300,000

	Description	The project is for the administration of the CDBG program.
	Target Date	9/30/2020
	Estimate the number and type of families that will benefit from the proposed activities	This project is for the administration of the CDBG program, and does not result in beneficiaries.
	Location Description	This project will be undertaken by Lee County Human and Veteran Services in Fort Myers, FL.
	Planned Activities	This project will include activities for the administration of the CDBG program.
8	Project Name	CDBG Urban County Administration
	Funding	CDBG: \$58,017
	Description	This project is for the administration of the Urban County program.
	Target Date	9/30/2020
	Estimate the number and type of families that will benefit from the proposed activities	This project will not result in beneficiaries.
	Location Description	This project will be undertaken by Lee County Human and Veteran Services in Fort Myers, FL.
	Planned Activities	This project will include activities for the administration of the Urban County program.
9	Project Name	CDBG Community Infrastructure
	Target Area	Central Fort Myers
	Goals Supported	Public Facility Improvements
	Needs Addressed	Community Revitalization
	Funding	CDBG: \$615,000
	Description	This project will consist of infrastructure improvements in low- and moderate-income target areas of Lee County. Currently planned projects include adding sidewalks in the central Fort Myers target region with the Pine Manor and Page Park communities.
	Target Date	9/30/2020
	Estimate the number and type of families that will benefit from the proposed activities	A total of 5,515 low- and moderate-income persons reside within the Pine Manor and Page Park communities where sidewalks are planned for the 2019 program year.
	Location Description	Currently planned projects include adding sidewalks in the central Fort Myers target region with the Pine Manor and Page Park communities.

	Planned Activities	This project will consist of infrastructure improvements in low- and moderate-income target areas of Lee County. Currently planned projects include adding sidewalks in the central Fort Myers target region with the Pine Manor and Page Park communities.
10	Project Name	CDBG Community Public Services
	Target Area	North Fort Myers Central Fort Myers
	Goals Supported	Public Services for Community Revitalization
	Needs Addressed	Community Revitalization
	Funding	CDBG: \$200,000
	Description	This project will consist of public services for the benefit of low- and moderate-income persons within the local target areas. Funds will be used to provide a Community Resource Specialist (CRS) for the two target areas. The CRS will assist low- and moderate-income persons directly as well as coordinate the delivery of various public services. Services may include, but not be limited to the provision of educational classes, assistance accessing services, job training and placement, and other activities to promote community engagement. Funds will also be used to pay for operating expenses (utilities, insurance, etc.) for Community Center buildings where public services are located in compliance with 24 CFR 570.201 (e).
	Target Date	9/30/2020
	Estimate the number and type of families that will benefit from the proposed activities	Community revitalization plans specify that approximately 20% of those populations should benefit from public service activities. Therefore, it is estimated that the project will benefit approximately 1,895 persons in the specified target areas.
	Location Description	The project will be undertaken in four communities located within the two local target areas. The Central Fort Myers area includes Pine Manor and Page Park, and the North Fort Myers area includes Suncoast Estates and Palmona Park.
	Planned Activities	This project will consist of public services for the benefit of low- and moderate-income persons within the local target areas. Funds will be used to provide a Community Resource Specialist (CRS) for the two target areas. The CRS will assist low- and moderate-income persons directly as well as coordinate the delivery of various public services. Services may include, but not be limited to the provision of educational classes, assistance accessing services, job training and placement, and other activities to promote community engagement. Funds will also be used to pay for operating expenses (utilities, insurance, etc.) for Community Center buildings where public services are located in compliance with 24 CFR 570.201 (e).
11	Project Name	CDBG Non-Profit Capital Improvement
	Goals Supported	Public Facility Improvements
	Needs Addressed	Public Facility Improvements
	Funding	CDBG: \$250,000

	Description	This project will consist of capital improvements for non-profit organizations that serve low- and moderate-income persons.
	Target Date	9/30/2020
	Estimate the number and type of families that will benefit from the proposed activities	It is estimated that one public facility will be assisted. Beneficiaries will be determined upon receipt of applications.
	Location Description	This project will consist of capital improvements for non-profit organizations that serve low- and moderate-income persons. Project location will be determined on receipt of applications, but may be undertaken in target areas or other areas of unincorporated Lee County.
	Planned Activities	This project will consist of capital improvements for non-profit organizations that serve low- and moderate- income persons. Activities and beneficiaries will be determined upon receipt of applications.
12	Project Name	CDBG/HOME Non-Profit Housing Development
	Goals Supported	Affordable Housing Development
	Needs Addressed	Affordable Housing
	Funding	CDBG: \$416,232 HOME: \$140,098
	Description	This project will consisted of the development of affordable housing through acquisition, acquisition and rehabilitation, or new construction as allowable by funding source.
	Target Date	9/30/2020
	Estimate the number and type of families that will benefit from the proposed activities	It is estimated that at least one affordable housing units will be developed from this project.
	Location Description	The specific location for this project has not yet been determined, but the project may be identified in targeted, as well as, non-targeted areas of Lee County.
	Planned Activities	This project will consisted of the development of affordable housing through acquisition, acquisition and rehabilitation, or new construction as allowable by funding source.
13	Project Name	HOME Project Delivery
	Goals Supported	Affordable Housing Development Down Payment Assistance Housing and Services for Persons who are Homeless
	Needs Addressed	Affordable Housing Housing and Services for the Homeless
	Funding	HOME: \$93,500
	Description	This project supports the administration of the HOME program.

	Target Date	9/30/2020
	Estimate the number and type of families that will benefit from the proposed activities	This project does not result in beneficiaries.
	Location Description	This project will be undertaken by Lee County Human and Veteran Services in Fort Myers, FL
	Planned Activities	Administration of the HOME program.
14	Project Name	HOME Down Payment Assistance
	Goals Supported	Down Payment Assistance
	Needs Addressed	Affordable Housing
	Funding	HOME: \$360,000
	Description	This project includes the provision of down payment assistance to eligible homebuyers in Lee County.
	Target Date	9/30/2020
	Estimate the number and type of families that will benefit from the proposed activities	It is estimated 18 low- to moderate-income household will benefit from the proposed activities.
	Location Description	This project will be undertaken in all areas of Lee County.
	Planned Activities	Provision of down payment assistance to eligible homebuyers in Lee County.
15	Project Name	HOME CHDO Housing Development
	Goals Supported	Affordable Housing Development
	Needs Addressed	Affordable Housing
	Funding	HOME: \$145,000
	Description	This project will consist of CHDO acquisition and rehabilitation or new construction of housing units.
	Target Date	9/30/2020
	Estimate the number and type of families that will benefit from the proposed activities	This project is estimated to result in the acquisition, acquisition and rehabilitation, or construction of one housing unit to benefit one eligible household.
	Location Description	The location of this project will be determined by the CHDO, and may be completed in target areas as well as non-targeted areas of Lee County.
	Planned Activities	This project will consist of CHDO acquisition, acquisition and rehabilitation, or construction of one housing unit.
16	Project Name	HOME Tenant Based Rental Assistance
	Goals Supported	Housing and Services for Persons who are Homeless

	Needs Addressed	Housing and Services for the Homeless
	Funding	HOME: \$275,000
	Description	This project consists of using HOME funds for a tenant based rental assistance (TBRA) program for households who are homeless. TBRA provides rental subsidies to assist households to obtain and maintain permanent housing.
	Target Date	9/30/2020
	Estimate the number and type of families that will benefit from the proposed activities	It is estimated that 26 households will benefit from this project.
	Location Description	This project will be administered by the Lee County Human and Veteran Services, located in Fort Myers, Florida. Assistance will be provided throughout the county.
	Planned Activities	This project consists of using HOME funds for a tenant based rental assistance program for households who are homeless. Eligible costs will include security and utility deposits as well as rental assistance. Clients will also receive case management.
17	Project Name	ESG19 Lee County
	Goals Supported	Housing and Services for Persons who are Homeless
	Needs Addressed	Housing and Services for the Homeless
	Funding	ESG: \$255,297
	Description	Lee County plans to use the 2019 Federal Fiscal Year allocation of ESG funds to provide rapid rehousing for persons who are experiencing homelessness and for program administration.
	Target Date	9/30/2020
	Estimate the number and type of families that will benefit from the proposed activities	An estimated 37 households will benefit from rapid re-housing activities.
	Location Description	The project will take place at the Lee County Human and Veteran Services, located in Fort Myers, Florida, as well as at the Bob Janes Triage Center and Low Demand Shelter also located in Fort Myers, Florida.
	Planned Activities	Project will consist of the program administration and rapid re-housing activities at Lee County Human and Veteran Services and at the Bob Janes Triage Center and Low Demand Shelter.

AP-50 Geographic Distribution – 91.220(f)

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

CDBG funds will be used in unincorporated Lee County, the City of Bonita Springs, the City of Sanibel, and the Town of Fort Myers Beach.

Some CDBG funds will be concentrated on community revitalization, and therefore, will be used in the targeted areas noted in the Consolidated Plan. HOME and ESG funds will be used countywide. Maps indicating the low income and minority, including Hispanic, concentrations are attached to this plan.

Rationale for the priorities for allocating investments geographically

In order to assist as many residents as possible, the County dedicates only a portion of the funds to specific areas. These designations are based on the partner municipalities' urban county agreement requirements in the case of Bonita Springs, Sanibel, and Fort Myers Beach. In other locations, funds are allocated to areas meeting the low to moderate-income designations as issued by HUD. Those areas have been designated by the County as target areas, and each has a revitalization plan that is used for project planning purposes.

Affordable Housing

AP-55 Affordable Housing – 91.220(g)

Affordable housing will be provided through CDBG and HOME assistance. Additional funding sources for affordable housing will include NSP and State Housing Initiative Partnership (SHIP) funding (state funding). NSP program income funds will be used to purchase, rehabilitate, and sell foreclosed properties to income eligible homebuyers. SHIP funds will be used to provide down payment assistance for qualified buyers. Lee County will also continue to search for additional resources available for the development of affordable housing units.

One Year Goals for the Number of Households to be Supported	
Homeless	68
Non-Homeless	56
Special-Needs	0
Total	124

Table 57 - One Year Goals for Affordable Housing by Support Requirement

One Year Goals for the Number of Households Supported Through	
Rental Assistance	68
The Production of New Units	2
Rehab of Existing Units	33
Acquisition of Existing Units	21
Total	124

Table 58 - One Year Goals for Affordable Housing by Support Type

Discussion

An estimated 42 homeless households will be assisted with ESG rapid re-housing programs, 26 homeless households will be assisted with the Tenant Based Rental Assistance program. Additionally, an estimated 30 owner occupied housing rehabilitations will be completed using CDBG, and three will be completed using NSP funds. Approximately two new units will be acquired and rehabilitated, or constructed through CDBG and/or HOME funds. Down Payment Assistance will be provided for approximately 18 acquisitions using HOME funds and three using SHIP funds.

AP-60 Public Housing – 91.220(h)

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

Due to a lack of affordable housing options, there is a great demand for public housing units and housing choice vouchers. This has resulted in a significant waiting list for both types of housing, which is regularly closed. The Public Housing waitlists opens one (1) time per year for a two (2) week period. During this two (2) week period, it is likely that over 2000 names will be placed on the waitlists. Waitlists are monitored throughout the year to ensure they are opened as often as needed.

The Housing Authority of the City of Fort Myers' (HACFM) affiliate, Southwest Florida Affordable Housing Choice Foundation (SWFLAHCF) Inc. has converted its 82 NSP units to Project Based Voucher units. This will allow a larger clientele base creating more housing opportunities to not only the Very Low Income clients but also to the Extremely Low Income clients whose income falls at or below 30% of the AMI.

HACFM added an additional 72 units to its inventory stock at The Homes at Renaissance Preserve, which completes the projects development.

HACFM continues to promote a safe living environment for all residents. HACFM continues to partner and works with the local police department to add enhanced security at all properties. HACFM will add several security enhancements to Southward Village, a public housing development with 200 units. Such enhancements include but are not limited to added security lighting, high definition cameras, road closures to create a one way in and one way out of the development and the installation of a guardrail on the outer perimeter of the development. HACFM and Fort Myers Police Department (FMPD) are working to open a Police Substation at Southward Village, The Landings at East Pointe, and The Homes at Renaissance Preserve.

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

The Housing Authority of the City of Fort Myers (HACFM) continues to promote current Housing Choice Voucher (HCV) participants to join the HCV Family Self Sufficiency (FSS) program and Homeownership program. The FSS program was designed to connect families receiving subsidized housing assistance with access to community services and resources such as employment training, job-readiness, homeownership education, etc. necessary to advance families toward self-sufficiency. HACFM also continues to offer a Community Supportive Services (CSS) program for relocated residents of the revitalized Michigan Court, Renaissance Preserve and Horizons communities. The purpose of the CSS program is to provide support services such as job-skills training, childcare, transportation, and adult/youth education programs. Support services are vital in transitioning families into self-sufficiency.

HACFM continues to grow its number of HCV Homeownership Vouchers. HACFM continues to encourage interested residents to participate in the HCV FSS program offered at HACFM.

HACFM continues to offer strategies to encourage homeownership, as well as financial literacy and budget classes to all HCV clients. HACFM continues to believe that families with more education and

control over money will be able to provide more for themselves, while potentially moving toward homeownership. As a HUD certified housing counseling agency, HACFM provides an array of housing counseling services for public housing and Section 8 residents. Counseling services include but not limited to: Home Buyer Education classes, debt reductions, budgeting, credit restoration, mortgage qualifications, foreclosure prevention, pre & post purchase counseling, in addition to assistance to renters. HACFM has a certified Senior Credit Counselor on staff to assist tenants with getting their credit repaired to be eligible for homeownership.

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

HACFM is not designated as troubled.

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

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

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

Much of the outreach to homeless persons is conducted at community events such as the Point in Time Count and the Stand Down/Service Day, and by the many caseworkers at community agencies including, the U.S. Department of Veterans Affairs, the Lee County Homeless Coalition, schools, and other entities that encounter individuals and families who are homeless during service delivery or during their regular course of business. The Continuum of Care has also developed and implemented a coordinated assessment process to better address needs, target resources, and ensure engagement with services are more efficient for persons who are homeless. Needs are assessed through the coordinated assessment process during various points of contact at community agencies and through outreach events. Lee County Human and Veteran Services recently implemented a street outreach program that focuses on engaging persons experiencing unsheltered homelessness, completing Coordinated Assessment, and linking those persons with housing and supportive services.

There are also specific events held throughout the year to raise awareness and promote outreach to persons who are homeless. Such events include the annual Candlelight Vigil, Homeless Challenge, and Community Conversations. In addition, the Lee County Homeless Coalition and Lee County Continuum of Care work together to facilitate ongoing community engagement through one-on-one meetings with elected officials and other community leaders.

Addressing the emergency shelter and transitional housing needs of homeless persons

The provision of emergency shelter at the Bob Janes Triage Center and Low Demand Shelter helps to address some of the needs of individuals who are homeless. The HOME Tenant Based Rental Assistance

program also supports the housing needs of individuals and families who are homeless, by providing a permanent housing solution instead of emergency shelter. As additional funding sources become available, Lee County may engage other community partners for the development of additional projects or programs. Emergency shelter and transitional housing needs may also be addressed through grant funding opportunities, such as the competitive Continuum of Care process, and through other state or local funding streams.

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 plan's goals of providing homeless housing and services will help to prevent homelessness, re-house, or otherwise permanently house persons who are homeless. The Lee County Continuum of Care has established written standards for prioritization to ensure that persons with especially high needs are linked with adequate housing and supportive services. Additionally, the implementation of the coordinated entry process ensures that persons who are homeless are rapidly linked with appropriate housing resources and support. Ongoing collaboration between service providers and the Continuum of Care, and frequent reviews of HMIS data facilitate the implementation of strategies to reduce the length of time a person experiences homelessness.

These goals will be supported through the use of ESG funding which is used to engage and rapidly re-house persons who are homeless. Other than the funds available through this process, permanent housing needs may be addressed through other resources identified elsewhere in this plan, and through other grant funding opportunities, such as the competitive Continuum of Care process, and through other state or local funding streams.

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

Human and Veteran Services and other local agencies provide many programs and services aimed at preventing homelessness and stabilizing clients. These programs include job training, job readiness, financial management courses, and active case management. Several homelessness prevention programs, active throughout the County, provide assistance with rent and utilities to ensure that persons who are extremely low-income do not become homeless. These programs have streamlined the application, assistance, and referral process for persons who are homeless by participating in the coordinated entry

process implemented by the Continuum of Care.

In addition, discharge-planning agreements are in place with the local foster care agency, mental health and substance abuse provider, jail, and hospital. These agencies refer clients to appropriate service and housing providers to ensure that they are not discharged into homelessness.

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

Actions it planned to remove or ameliorate the negative effects of public policies that serve as barriers to affordable housing such as land use controls, tax policies affecting land, zoning ordinances, building codes, fees and charges, growth limitations, and policies affecting the return on residential investment

At this time, there are no identified public policies that create barriers to affordable housing. Lee County recently implemented affordable housing incentives as part of the 2017-2020 Local Housing Assistance Plan in an effort to encourage the development of additional affordable housing. Lee County continues to invest NSP program income to create additional affordable housing through the rehabilitation and sale of foreclosed homes to eligible homebuyers.

In addition, quarterly reports are collected from regional partners to evaluate the actions taken toward addressing barriers to fair housing, as noted in the Analysis of Impediments. Actions taken toward eliminating these barriers will include providing accessibility and modifications in housing units. Lee County has collaborated with other local governments and the public housing authorities to update the Analysis of Impediments to Fair Housing Choice (AI). The updated AI is attached to Lee County's 2019-2023 Consolidated Plan.

AP-85 Other Actions – 91.220(k)

Actions planned to address obstacles to meeting underserved needs

Lee County, in coordination with other local service providers, plans to undertake the projects and associated activities, as noted in this plan, to address underserved needs such as substandard housing conditions, public services, infrastructure, and non-profit capital improvements. Projects and activities such as these are not anticipated to encounter obstacles during completion.

Public comments indicate a significant need for additional affordable housing units. Lee County intends to undertake multiple projects to facilitate the development of additional affordable housing units. Obstacles to these projects may include limited availability of units to be acquired or rehabilitated, and limited resources available to complete projects. Lee County will ensure that identified units are suitable for affordable housing development through underwriting, and coordination with community partners and other county departments, as required.

Actions planned to foster and maintain affordable housing

Actions planned include using CDBG, HOME, and state funds to provide owner occupied housing rehabilitation assistance and down payment assistance. In addition, HOME funds are being allocated for tenant based rental assistance and CHDO and Non-CHDO housing development to facilitate the development of additional affordable housing units. Lee County has implemented the HOPWA Tenant Based Rental Assistance Program (TBRA), which is projected to house about 10-15 of the most vulnerable HIV/AIDS households. Partnerships with the Public Housing Authorities and other local housing providers will provide additional resources to foster and maintain affordable housing through new construction, rehabilitation, and referral to currently available units.

Actions planned to reduce lead-based paint hazards

Homes built prior to 1978 where painted surfaces will be disturbed will be inspected for lead based paint. If lead is detected during the inspection, an assessment will be completed, followed by abatement.

Actions planned to reduce the number of poverty-level families

Lee County Human and Veteran Services supports anti-poverty programs of non-profit social service agencies with county general funds through the Partnering for Results Program. Lee County has budgeted \$4,743,971, to support programs, which provide a variety of anti-poverty services in the following categories: Children & Youth Programs and other Supportive Living type services. All programs address issues to assist in reducing poverty and assisting low/moderate income households. Beginning 10/01/18, 44 programs were funded within 32 agencies in the following categories: 28 programs providing Children & Youth services and 16 providing Supportive Living services.

Human and Veteran Services provides anti-poverty action in its neighborhood building program area by working with the neighborhoods to coordinate resources for employment and self-sufficiency programs. Antipoverty efforts of the Family Self-Sufficiency program area consist of homeless programs, emergency assistance (rental, mortgage and utility payments), housing and financial counseling, case management, and educational services. Such programs include a financial literacy education program for families participating in homeless prevention and rehousing programs, and a soft skills employment-training program. Educational services are funded by the Community Services Block Grant, and aim to increase self-sufficiency and upward job mobility for low-income households. Participants maintain close contact with case management staff and receive individual supportive services if necessary to ensure successful completion of the programs and long-term self-sufficiency. Additional antipoverty efforts include funding state mandated programs for substance abuse, mental health, Medicaid, and indigent medical care. Lee County provides additional funds, beyond the state requirements, to increase levels of services, including funding for specialty courts, such as Drug and Veteran's Mental Health Courts.

Actions planned to develop institutional structure

Institutional structure is not deemed lacking. Gaps in providing programs or services that meet the priority needs will be evaluated on an annual basis, but at the onset of this planning cycle, there are no identified gaps to implementation. Continued coordination will help to ensure an effective institutional structure.

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

Lee County works to bring together different groups and agencies, including private housing and social service agencies, when appropriate for both specific projects and for overall planning. In addition, the County works with local housing agencies to leverage resources to meet housing, infrastructure, and other service needs throughout the County. Human and Veteran Services is currently partnering with the Public Housing Authorities and local service providers to utilize existing and apply for additional HUD Mainstream Vouchers, which will facilitate enhanced collaboration among service providers.

Lee County, the Housing Authority of the City of Fort Myers, Veterans Affairs, and the Lee County Homeless Coalition also participated in the Zero: 2016 initiative, which effectively ended Veteran homelessness in Lee County. As the lead agency for the Continuum of Care, Human and Veteran Services continues to work with these and other agencies to coordinate the delivery of housing and services for persons who are homeless.

Program Specific Requirements

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

Community Development Block Grant Program (CDBG)

Reference 24 CFR 91.220(I)(1)

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

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

Other CDBG Requirements

1. The amount of urgent need activities	0
2. The estimated percentage of CDBG funds that will be used for activities that benefit persons of low and moderate income. Overall Benefit - A consecutive period of one, two or three years may be used to determine that a minimum overall benefit of 70% of CDBG funds is used to benefit persons of low and moderate income. Specify the years covered that include this Annual Action Plan.	99.00%

HOME Investment Partnership Program (HOME)
Reference 24 CFR 91.220(1)(2)

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

Not applicable.

2. A description of the guidelines that will be used for resale or recapture of HOME funds when used for homebuyer activities as required in 92.254, is as follows:

Lee County has elected to use Recapture as the primary method of ensuring affordability for low-to-moderate income homebuyers; however, resale provisions will be used when HOME funds are provided directly to a developer to reduce the development costs thereby making the price of the home affordable to the buyer. Any recaptured funds will be deposited in a HOME Trust Fund, (depending on original source of funds), to be utilized for any eligible activity within Lee County. The full version of the Lee County Resale and Recapture Policy is available at Human and Veteran Services.

3. A description of the guidelines for resale or recapture that ensures the affordability of units acquired with HOME funds? See 24 CFR 92.254(a)(4) are as follows:

Any recaptured funds will be deposited in a HOME Trust Fund, (depending on original source of funds), to be utilized for any eligible activity within Lee County, expanding the number of affordable housing units. Depending on the circumstances of recapture, the affordability of the units may be waived (such as the case in a foreclosure). In the case of resale, the unit will be resold to an eligible buyer, preserving affordability. The full version of the Lee County Resale and Recapture Policy is available at the Human and Veteran Services.

4. Plans for using HOME funds to refinance existing debt secured by multifamily housing that is rehabilitated with HOME funds along with a description of the refinancing guidelines required that will be used under 24 CFR 92.206(b), are as follows:

Not applicable.

**Emergency Solutions Grant (ESG)
Reference 91.220(1)(4)**

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

The existing Lee County Policy and Procedure manual and CoC Written Standards and Coordinated Entry Policies will be used to outline standards for the ESG rapid re-housing project. CoC Written Standards and Coordinated Entry Policies are attached to this plan.

In general, eligibility will be determined prior to providing assistance. Applicants must have incomes at or below 50% of the area median income. Households must meet the HUD's definition of homelessness under Category 1, any subsequent CoC Program Notice of Funding Availability (NOFA) eligibility requirements, and any additional funder eligibility requirements. Once meeting the rapid re-housing eligibility requirements, households are then prioritized by Lee County's target populations.

Income inclusions, income exclusions, and documentation standards can be found in the referenced manual. Verification and documentation of eligibility will be maintained in participant case files. Provided the requirements of each individual self-sufficiency plan are met, eligible households can receive 50 percent rent subsidies for six months. Exceptions may be made to the duration of assistance after management review and approval.

For the shelter operations component of ESG, standards for assistance will be detailed in the sub recipient provider contract and will stipulate eligible expenditures, beneficiary reporting requirements, and other procedural components of the program.

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

The Coordinated Entry System has three goals:

- 1) to help people move through the homeless service system faster,
- 2) reduce new entries into homelessness through prevention and diversion resources, and
- 3) improve data collection and quality to provide accurate information on what assistance consumers need.

The Lee County Continuum of Care (CoC) has developed a coordinated entry system, which uses the existing HMIS system. The process includes the use of a standardized assessment for all individuals, as well as a coordinated referral and housing placement processes to ensure that people experiencing homelessness receive appropriate assistance with both immediate and long-term housing and service needs. In addition, monthly meetings are held to ensure especially high risk clients are linked with the appropriate services. Quarterly planning workshops with outreach workers and service providers are also held to obtain input on the design and help to secure buy-in for the system. Training for local agencies continues to be provided on an on-going basis as needed. The CoC Governing Board has reviewed and updated the Coordinated Entry Policies and Procedures in accordance with CPD Notice 17-01.

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

Lee County has determined the programs to receive assistance and their allocations based on comments received by the public and in consultations during the planning process, as well as staff review of program success to date. A portion of the ESG allocation is provided to the Salvation Army support rapid-rehousing activities at the Bob Janes Triage Center and Low Demand Shelter.

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

This requirement has been met.

5. Describe performance standards for evaluating ESG.

Overall evaluation of the ESG program will be undertaken by the Continuum of Care Governing Board. The Governing Board has established the following performance targets for all CoC and ESG funded projects:

1. 65% of persons in ES,SH, TH, or PH-RRH should be exited to permanent housing destinations
2. 45% of persons in CoC and ESG funded programs should maintain OR increase their income
3. No more than 35% of persons who were exited from CoC and ESG funded programs should return to homelessness within 1 year

Performance standards may be evaluated on a project-by-project basis. At minimum, Lee County expects to assist 68 households through HOME and ESG funded re-housing activities. Success of these programs will be measured by examining the beneficiaries served and system performance measures.

Citizen Participation and Consultation Attachments

November 1, 2018 Public Meeting Notice

February 28, 2019 Public Meeting Notice

Community Needs Ranking Summary

Community Conversations and Local Government Consultation Notes

30-day Public Comment Period Notice

NOTARY PUBLIC

THE NEWS-PRESS
Published every morning
Daily and Sunday
Fort Myers, Florida
Affidavit of Publication
STATE OF FLORIDA
COUNTY OF LEE

Before the undersigned authority, personally appeared **Milagros A. Isberto** who on oath says that he/she is an **Assistant** of the News-Press, a daily newspaper, published in print and online at Fort Myers, in Lee County, Florida; that the attached copy of advertisement, being a

Legal Display

In the matter of:

**Lee County Dept. of Human Services
Notice of Hearings 2018-2019**

In the court was published in said newspaper and/or on the website in the issues of

November 1, 2018

Affiant further says that the said News-Press is a newspaper of general circulation daily in Lee, Charlotte, Collier, Glades and Hendry Counties and published at Fort Myers, in said Lee County, Florida and that said newspaper has heretofore been continuously published in said Lee County, Florida, each day, and has been entered as a second class mail matter at the post office in Fort Myers in said Lee County, Florida, for a period of one year next preceding the first publication of the attached copy of the advertisement; and affiant further says that he/she has neither paid nor promised any person, firm or corporation any discount, rebate, commission or refund for the purpose of securing this advertisement for publication in the said newspaper.

Milagros A. Isberto

Sworn to and subscribed before me this **1st** day of **November, 2018.**

By **Milagros A. Isberto**
personally known to me or who has produced

as identification, and who did or did not take an oath.

Notary Public *Janet E Cobb*

Print Name: **Janet E. Cobb**
My commission Expires: February 13, 2021



Lee County **Notice of Public Hearings**

In accordance with U.S. Department of Housing and Urban Development (HUD) regulations governing Community Development Block Grant (CDBG), Emergency Solutions Grant (ESG), and HOME programs, Lee County hereby notifies the public that a series of public hearings will be held to take comments related to the development of the 2019 Annual Action Plan, Five Year Consolidated Plan for HUD Fiscal Years 2019-2023, Analysis of Impediments to Fair Housing Choice, and Community Services Block Grant (CSBG) Strategic Plan.

Lee County will use 2018 budget figures for planning purposes, as the 2019 amounts have not been announced. In general, housing, neighborhood development, and projects to assist persons who are homeless will be undertaken. Lee County encourages residents to participate in this planning process. All comments will be considered in preparing the plans and reported in the documents. The public meetings will take place at the following times and locations.

- **November 15, 2018 at 5:30 pm**
Lee County Human and Veteran Services, 2440 Thompson St., Fort Myers, FL 33901
- **December 4, 2018 at 6:30 pm**
Sanibel Captiva Community Bank, 2475 Library Way, Sanibel, FL 33957
- **December 10, 2018 at 6:00 pm**
Pine Manor Community Center, 5547 Tenth Ave., Fort Myers, FL 33907
- **January 16, 2019 at 6:00 pm**
Beacon of Hope Pine Island, 5090 Doug Taylor Circle, St James City, FL 33956
- **January 23, 2019 at 6:00 pm**
Veteran's Park Multipurpose Room, 56 Homestead Rd. S., Lehigh Acres, FL 33936
- **February 7, 2019 at 6:00 pm**
Liles Hotel, 27300 Old 41 Road, Bonita Springs, FL 34135
- **February 25, 2019 at 6:00 pm**
Chapel by the Sea, 100 Chapel St., Fort Myers Beach, FL 33931
- **March 14, 2019 at 5:30 pm**
Lee County Human and Veteran Services, 2440 Thompson St., Fort Myers, FL 33901

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Notice of Public Hearings



In accordance with U.S. Department of Housing and Urban Development (HUD) regulations governing Community Development Block Grant (CDBG), Emergency Solutions Grant (ESG), and HOME programs, Lee County hereby notifies the public that a series of public hearings will be held to take comments related to the development of the 2019 Annual Action Plan, Five Year Consolidated Plan for HUD Fiscal Years 2019-2023, Analysis of Impediments to Fair Housing Choice, and Community Services Block Grant (CSBG) Strategic Plan.

Lee County will use 2018 budget figures for planning purposes, as the 2019 amounts have not been announced. In general, housing, neighborhood development, and projects to assist persons who are homeless will be undertaken. Lee County encourages residents to participate in this planning process. All comments will be considered in preparing the plans and reported in the documents. The public meetings will take place at the following times and locations.

- **November 15, 2018 at 5:30 pm**
Lee County Human and Veteran Services, 2440 Thompson St., Fort Myers, FL 33901
- **December 4, 2018 at 5:30 pm**
Sanibel Captiva Community Bank, 2475 Library Way, Sanibel, FL 33957
- **December 10, 2018 at 6:00 pm**
Pine Manor Community Center, 5547 Tenth Ave., Fort Myers, FL 33907
- **January 16, 2019 at 6:00 pm**
Beacon of Hope Pine Island, 5090 Doug Taylor Circle, St James City, FL 33956
- **January 23, 2019 at 6:00 pm**
Veteran's Park Multipurpose Room, 55 Homestead Rd. S., Lehigh Acres, FL 33936
- **February 7, 2019 at 6:00 pm**
Liles Hotel, 27300 Old 41 Road, Bonita Springs, FL 34135
- **February 25, 2019 at 6:00 pm**
Chapel by the Sea, 100 Chapel St., Fort Myers Beach, FL 33931
- **March 14, 2019 at 5:30 pm**
Lee County Human and Veteran Services, 2440 Thompson St., Fort Myers, FL 33901

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NP-0000965929

PROOF O.K. BY: _____ O.K. WITH CORRECTIONS BY: _____

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SALES PERSON: Janet Cobb PROOF DUE: -
PUBLICATION: NP-DAILY NEXT RUN DATE: 11/01/18
SIZE: 3 col X 6 in

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THE NEWS-PRESS
Published every morning
Daily and Sunday
Fort Myers, Florida
Affidavit of Publication

STATE OF FLORIDA
COUNTY OF LEE

Before the undersigned authority, personally appeared **Diana Figueroa**, who on oath says that he/she is an Assistant of the News-Press, a daily newspaper, published in print and online at Fort Myers, in Lee County, Florida; that the attached copy of advertisement, being a

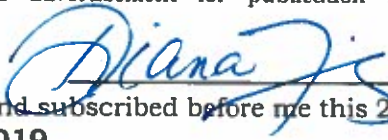
Legal Display

In the matter of:

NOTICE OF PUBLIC HEARING

In the court was published in said newspaper and/or on the website in the issues of February 28, 2019

Affiant further says that the said News-Press is a newspaper of general circulation daily in Lee, Charlotte, Collier, Glades and Hendry Counties and published at Fort Myers, in said Lee County, Florida and that said newspaper has heretofore been continuously published in said Lee County; Florida, each day, and has been entered as a second class mail matter at the post office in Fort Myers in said Lee County, Florida, for a period of one year next preceding the first publication of the attached copy of the advertisement; and affiant further says that he/she has neither paid nor promised any person, firm or corporation any discount, rebate, commission or refund for the purpose of securing this advertisement for publication in the said newspaper.



Sworn to and subscribed before me this 21st day of **March, 2019**.

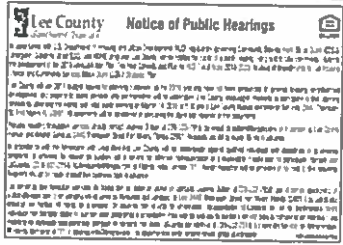
By **Diana Figueroa**
personally known to me or who has produced

as identification, and who did or did not take an oath.

Notary Public 

Print Name: **Kristyn A Marano**
My commission Expires: **October 04, 2023**

0000968723 / FNP-586656





Notice of Public Hearings










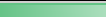


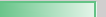





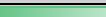
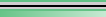
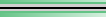
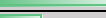
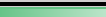














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Lee County will use 2018 budget figures for planning purposes, as the 2019 amounts have not been announced. In general, housing, neighborhood development, and projects to assist persons who are homeless will be undertaken. Lee County encourages residents to participate in this planning process by attending the eighth, and final, public meeting on March 14, 2019 at 5:30 pm at Lee County Human and Veteran Services, 2440 Thompson St., Fort Myers, FL 33901. All comments will be considered in preparing the plans and reported in the documents.

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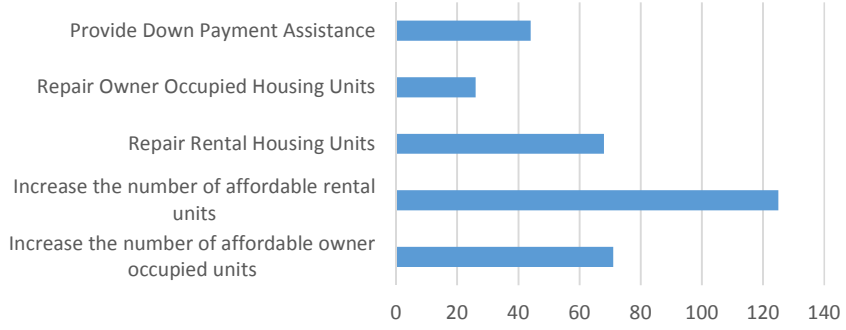
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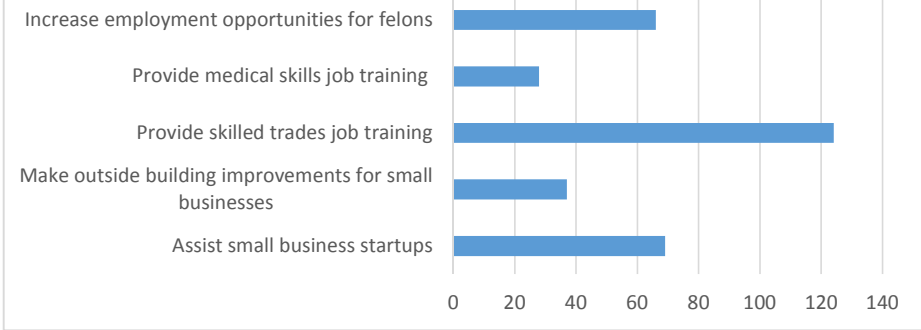
Grand Total		Rank your top three priorities in each category, using 1 for your highest priority and 3 for your lowest.			Category with Highest Points Wins	
		1's	2's	3's		
Housing	Increase the number of affordable owner occupied units	9	16	12		71
	Increase the number of affordable rental units	29	14	10		125
	Repair Rental Housing Units	13	11	7		68
	Repair Owner Occupied Housing Units	4	6	2		26
	Provide Down Payment Assistance	5	6	17		44
Economic Development	Assist small business startups	11	14	8		69
	Make outside building improvements for small businesses	7	5	6		37
	Provide skilled trades job training	26	20	6		124
	Provide medical skills job training	2	7	8		28
	Increase employment opportunities for felons	10	12	12		66
Homelessness	Increase emergency shelter beds	12	9	7		61
	Increase rental assistance programs	11	11	7		62
	Increase Mental Health and Substance Abuse Treatment Programs	24	14	6		106
	Increase Health Care Services	3	8	11		36
	Increase street outreach efforts	7	11	10		53
Seniors/Individuals with Disabilities/Veterans	Provide crime prevention and safety education	8	3	8		38
	Provide accessible housing	25	12	3		102
	Provide services to support independent living	14	20	7		89
	Increase the capacity of adult daycare or other assisted living facilities	12	15	12		78
	Increase opportunities for community engagement	1	7	11		28
Adults	Increase Mental Health and Substance Abuse Treatment Programs	20	17	7		101
	Increase Health Care Services	7	10	14		55
	Provide budgeting and financial education	9	6	3		42
	Provide crime prevention and safety education	7	4	8		37
	Increase emergency shelter beds for victims of human trafficking and domestic violence	11	12	5		62
	Increase counseling and services for victims of human trafficking and domestic violence	5	4	8		31
Youth	Increase low cost child care programs	16	10	11		79
	Increase afterschool programs	10	14	7		65
	Increase health care services	4	5	8		30
	Increase Mental Health and Substance Abuse Treatment Programs	13	11	7		68
	Increase emergency shelter beds	8	10	2		46
	Increase crime and drug prevention programs	9	10	8		55
Transportation	Increase bus routes to areas where jobs are located	22	21	10		118
	Increase transportation options for persons who are elderly and/or disabled	14	11	19		83
	Increase bus routes in areas with high low-income and minority populations	17	13	14		91

Fair Housing	Provide education about fair housing rights for renters and homebuyers	10	20	14		84
	Provide education about fair housing laws for landlords/mortgage lenders/realtors/etc.	14	19	14		94
	Use a secret shopper to identify discrimination	5	4	3		26
	Increase opportunities in areas with high low-income and minority populations	30	11	7		119
Public Facilities	Increase parks and recreational facilities	14	12	12		78
	Put in new sidewalks	21	14	6		97
	Improve and expand non-profit organization's buildings	14	7	9		65
	Create new community gardens	5	14	12		55

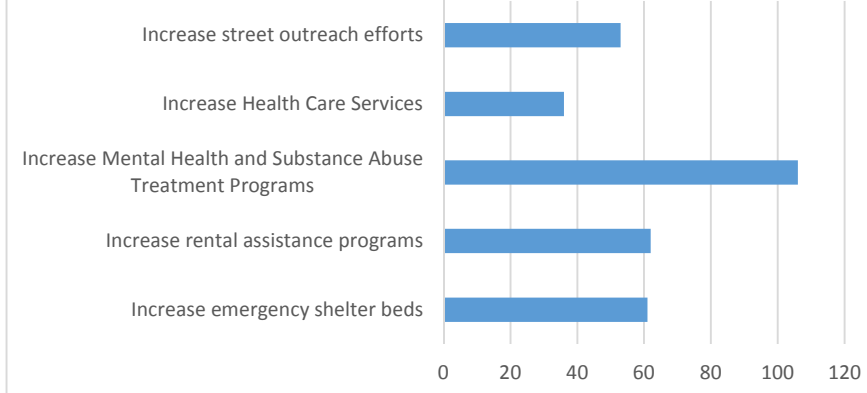
Housing



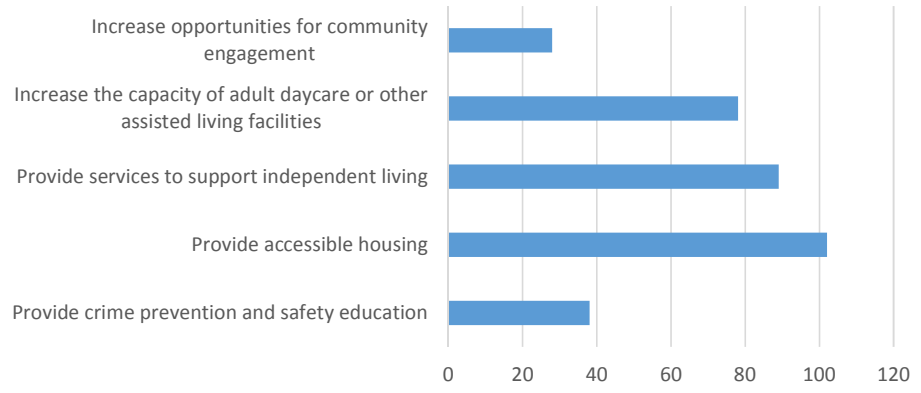
Economic Development



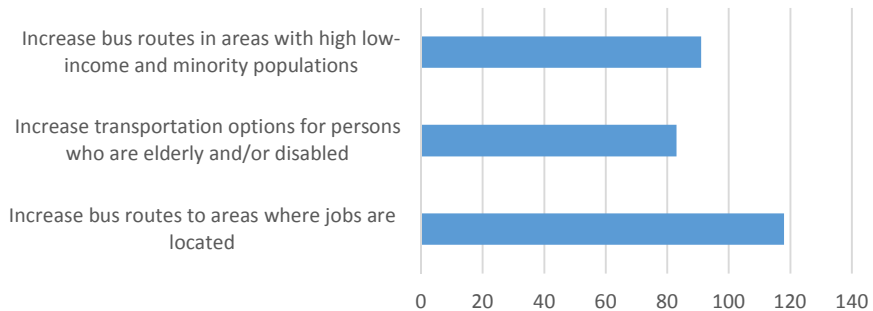
Homelessness



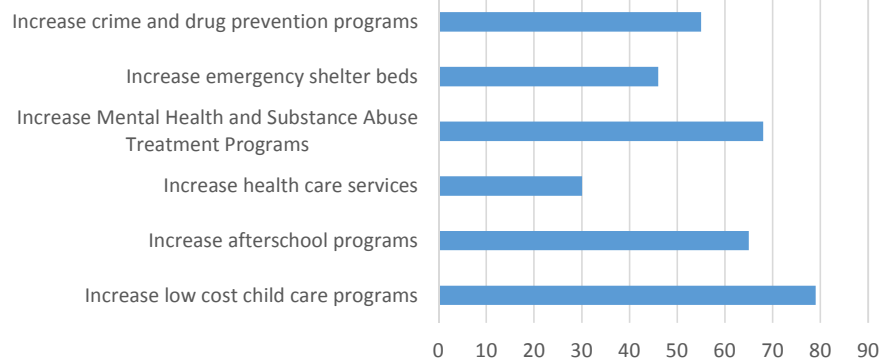
Special Populations



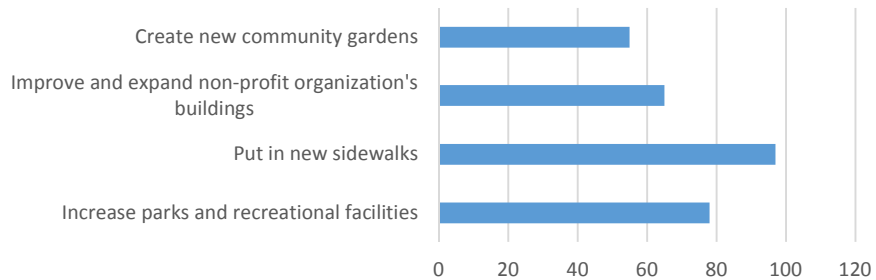
Transportation



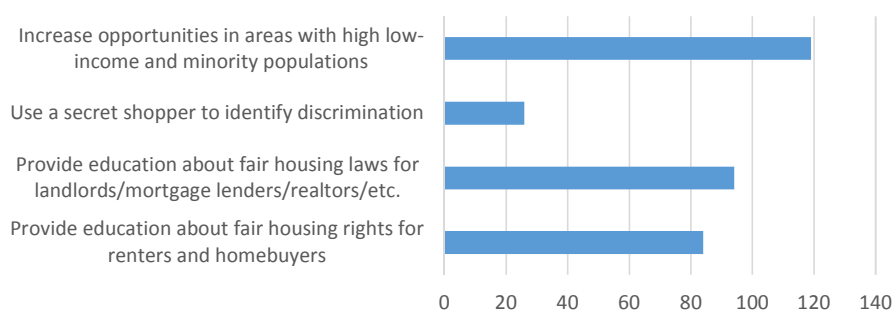
Public Services - Youth



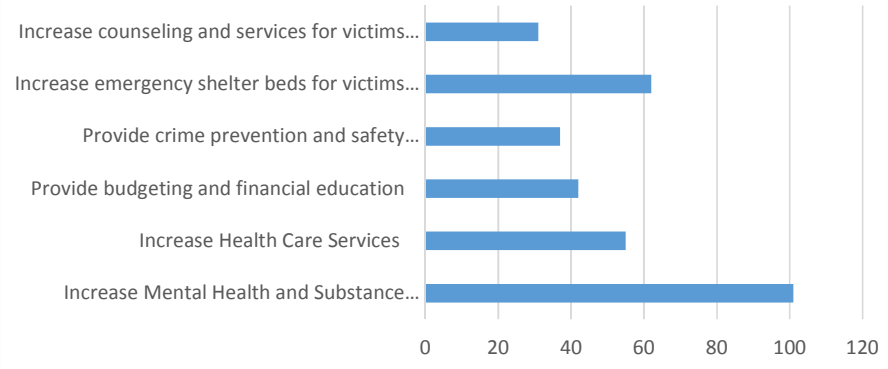
Public Facilities



Fair Housing



Public Services - Adults



Community Conversations and Local Government Consultation Notes

1. November 15, 2018 – CAA/NDC

Eleven members of the Community Action Agency/Neighborhood District Council and seven members of the public attended the November 15, 2018 meeting. An overview of the Con Plan, Annual Action Plan, Assessment of Fair Housing, Community Strategic Plan and Homeless Strategic Plan was provided, and eligible activities were reviewed and ranked by all attendees. Suggestions were made to consider implementing rideshare programs, non-profit and faith based transportation networks, and car repair programs for low-income households as a means to low transportation costs.

2. December 4, 2018 – Sanibel-Captiva – FISH

9 members of the public attended. An overview of the Con Plan, Annual Action Plan, Assessment of Fair Housing, Community Strategic Plan, and Homeless Strategic Plan was provided, and eligible activities were reviewed and ranked by all attendees. A variety of needs on Sanibel were discussed. The group identified a significant need to support affordable housing, primarily the preservation and development of rental housing. Secondly, needs for workforce transportation were identified, as many employees on the island commute long distances. Discussion regarding fair housing practices on the island revealed that there are few instances of discrimination, but attendees voiced the importance of having multi-lingual staff to ensure persons with limited English proficiency have access to services. Comments regarding services for youth and adults indicated a need for increased mental health and substance abuse treatment and substance abuse prevention programs for youth.

3. December 5, 2018 – Pine Island Cares Meeting

Shared with members of the PI Cares Committee that we are collecting public input for the plans, and encouraged attendance at the January 16, 2019 meeting. Several members discussed their transportation needs, including the lack of LeeTran availability on the island.

4. December 10, 2018 – Pine Manor Community Center

4 members of the public were present. An overview of the Con Plan, Annual Action Plan, Analysis of Impediments to Fair Housing, Community Strategic Plan, and Homeless Strategic Plan was provided. Conversation was held regarding needs in the areas of housing, economic development, homelessness, seniors, individuals with disabilities, veterans, adults, youth, fair housing, and public facilities. Discussion was held regarding the following areas:

- Homelessness – attendees noted that there are a large number of homeless individuals that visit the community center seeking assistance. There was also a large camp behind the “back store”, but it was recently broken up by LEO’s.
- Housing - Attendees discussed the housing affordability in both Pine Manor and Harlem Heights, and mentioned that the housing costs have gone up, but are still affordable.
 - Attendees also mentioned the large number of renters present in Pine Manor, and that was a factor in other community issues, such as the crime and lack of community engagement.
 - Attendees mentioned difficulty for felons and people with evictions to find housing.
- Fair Housing – attendees mentioned that 20% of the Pine Manor population is Haitian, there is also a large concentration of Hispanic individuals. Attendees discussed that some landlords

Community Conversations and Local Government Consultation Notes

segregate black and Hispanic populations in different rental units. One resident of Harlem Heights mentioned that there is sometime discrimination based on source of income.

- Economic Development – residents mentioned the need for a laundry mat in or near Pine Manor, as some residents do not have vehicles and the nearest laundry mat is very far away.
- Public Facilities – attendees mentioned the need for speed bumps and speed controls within the neighborhood for safety, especially on 10th Ave and Oak Drive.
- Other needs – Pine Manor residents discussed the need for more community engagement and a sense of community. Harlem residents mentioned the desire for a community garden.

5. January 9, 2019 – Pine Island Cares Meeting

Shared with members of the PI Cares Committee that we are collecting public input for the plans, and encouraged attendance at the January 16, 2019 meeting.

6. January 15, 2019 – Human Services Council, Lee County HVS

Eleven attendees were present at the meeting. An overview of the Con Plan, Annual Action Plan, Analysis of Impediments to Fair Housing, Community Strategic Plan, and Homeless Strategic Plan was provided. Conversation was held regarding needs in the areas of housing, homelessness, and other areas of need. Discussion was held regarding the following areas:

- Crime Prevention – one attendee mentioned the need to make people more aware of the programs that are currently available
- Homelessness – discussion was held regarding the relationship between CCPD and the homeless, an emphasis was placed on the importance of the relationship between LEO's and individuals who are homeless to build trust and eventually seek services. The need for additional homeless shelter, especially in Cape Coral, was mentioned.
 - Discussion was also held regarding the visibility of homelessness and finding a solutions to reduce such
- Housing – emphasis was placed on the need for affordable housing
- Public Participation – attendees discussed the importance of hearing from residents regarding needs and made suggestions to improve public participation, including using the faith based community and engaging businesses.

7. January 16, 2019 – Pine Island, Beacon of Hope

14 members of the public attended. An overview of the Con Plan, Annual Action Plan, Analysis of Impediments to Fair Housing, Community Strategic Plan, and Homeless Strategic Plan was provided. Conversation was held regarding needs in the areas of housing, economic development, homelessness, seniors, individuals with disabilities, veterans, adults, youth, transportation, fair housing, and public facilities. Attendees identified the following needs:

- Housing
 - Affordable rental units, rental assistance and down payment assistance programs are necessary on PI.
 - There is also a huge need for owner occupied housing rehab, especially for those individuals who own MH's but rent the land where the MH is located. There is a large minority concentration in Pink Citrus, that need MH rehab. Beacon of Hope ED suggested that Beacon of Hope might be willing to partner

Community Conversations and Local Government Consultation Notes

- with HVS and Homeowners to assist with the insurance costs required for rehab.
- There are also limited units for families with children. A couple of mobile parks have recently become 55+ forcing families with children to move to other areas. A resident reported that Pink Citrus MH Park is about 80% families with children.
- Homelessness
 - One resident asked “What helps homeless people get into housing?”. The Beacon of Hope ED mentioned the current restrictions on housing assistance, such as having to have employment, criminal histories etc.. A discussion was held regarding housing first practices, and the residents in attendance advocated for housing first practices countywide.
 - The attendees agreed that an emergency shelter or some emergency housing options is necessary on PI. Residents mentioned there are a very large homeless camp behind the Winn Dixie, including mostly single males and veterans.
 - Attendees mentioned that additional outreach is needed on PI to ensure that individuals experiencing homelessness are aware of programs.
 - The Beacon of Hope ED mentioned there are several residents, both homeless and low income, who need assistance getting Photo ID’s so they can receive medical care, and access other necessities such as bank accounts.
- Economic Development
 - Attendees agreed that training for skilled trade’s employees should be prioritized. They also discussed the need for a pool of workers to assist repairing businesses on the island. The Beacon of Hope ED mentioned that several businesses have to seek repair companies from off island, which often take a long time to respond, if there was a pool of skilled trade’s workers on the island that would be helpful for the workers and the businesses.
 - Additional comments also mentioned the provision of childcare training to provide for jobs and more childcare on the island.
 - Large portions of residents on the island have felonies, often DUI and drug related charges, and have difficulty finding jobs on the island. Limited transportation also prohibits them being able to obtain employment off island.
- Youth
 - Attendees discussed the limited activities for youth on the island. Due to this there are often problems with youth using drugs and getting into trouble. Attendees suggested the installation of a park on the North end of the island would provide a facility for youth activities and a safe place for children to play. One resident mentioned that kids currently play in the ponds behind the residential areas. One resident suggested a basketball court in these areas.
 - One resident mentioned the need for DARE and other drug prevention programs in the school because of the wide-spread availability of drugs and limited youth activities on the island.
 - The Beacon of Hope ED discussed a summer camp that was hosted a few years ago. Over 100 kids attended and enjoyed the camp, but the Beacon could not

Community Conversations and Local Government Consultation Notes

- continue the service. Lee County parks and rec offers a summer camp program, but the \$75 fee and transportation to Matlachee often limits attendance.
- A comment was made that Pine Island needed youth programs like Pine Manor. Additionally, the provision of youth programs was mentioned several other times throughout the meeting.
 - Food insecurity is often an issue for children in the summer, and there are no afterschool programs available.
 - There is 1 daycare on the island, whose capacity is inconsistent. They are also no longer willing to take children in the evenings to allow for GED participants to attend classes.
- Substance Abuse/Mental Health/HealthCare
 - The Beacon of Hope ED discussed the community health assets on PI, and mentioned that health care on the island is a lower need than other areas discussed. There is a gap in health care services for individuals 50 to 65 years of age, but Family Health Centers has been providing excellent services.
 - There are a large amount of drugs on the island, heroin is currently the most rapidly available drug. Most substance abuse and mental health issues are concentrated in the same areas of the low-income and high minority areas.
 - Public Facilities
 - Some discussion was held about making sidewalks and buildings ADA compliant
 - One resident mentioned that it would be helpful for businesses on the island to receive education about ADA requirements.
 - There is a significant need to adult day cares and assisted living facilities given the aging population on the island.
 - Discussion was held regarding a community garden, the chamber of commerce and the beacon of hope have both discussed.
 - Transportation is a MASSIVE need on the island, the Beacon of Hope is beginning a scheduled transportation route using a 14 passenger van, but it is anticipated that the need will be greater than the service that can be provided. Most residents do not have cars and/or licenses. Beacon of Hope conducted a survey of residents and will provide the results for use in the planning process.
 - Fair Housing
 - Attendees mentioned that they don't know of any housing discrimination that is currently taking place on the island. One resident mentioned that some discrimination used to take place at the MH parks, but some have new ownership and that has alleviated the issues. Attendees mentioned that most all locations are pet friendly and open to service animals.
 - There are a few areas that are highly concentrated with minorities and low income residents. This includes the alphabet streets and Pink Citrus MH Park.
 - Other needs
 - Attendees discussed the challenges for residents with felonies, poor credit, and no citizen status in opening and maintaining a bank account. A lot of cash is utilized on the island and low-income employees usually have to go to their employers bank and pay fees to cash paychecks.

Community Conversations and Local Government Consultation Notes

- Significant discussion was held regarding the Pink Citrus (formerly know as the Palms) mobile home park in Bookelia. There is a significant concentration of minority families with children, farmworkers, and undocumented workers. A lot of residents in the park work for HONC companies, and are doubled up. There is limited services on the North end of the island, and most residents do not have transportation.
- The island library is open only one evening during the week, but most families work after library hours, and residents would like to be able to use the library during other hours.
- Attendees discussed the success of mentorship and adopt-a-family programs in other areas, and would like opportunities for community activities where people of all ages and income groups can be involved together. Attendees discussed the success of the Pine Island Playhouse.
<https://www.facebook.com/PineIslandPlayhouse/>

8. January 23, 2019 – Lehigh Veteran’s Park

Four members of the public attended. An overview of the Con Plan, Annual Action Plan, Analysis of Impediments to Fair Housing, Community Strategic Plan, and Homeless Strategic Plan was provided. Conversation was held regarding needs in the areas of housing, economic development, homelessness, seniors, individuals with disabilities, veterans, adults, youth, transportation, fair housing, and public facilities. Attendees identified the following needs:

- Housing
 - Attendees discussed the limited affordability of rental units
- Economic Development
 - Attendees discussed the lack of employment opportunities in Lehigh, and emphasized the need for more skilled trades workers, especially those that work in Lehigh. One attendee mentioned that skilled trades workers often travel outside of Lehigh for work because they can make more money.
- Homelessness
 - Attendees discussed a large presence of chronically homeless individuals present in Lehigh and advocated for a cold weather shelter, possibly in partnership with local churches. Additionally, they emphasized the need for non-emergency medical services for the homeless in Lehigh, including prescriptions. The director of Lehigh Community Services, estimated there were around 15 clients who were homeless.
- Mental Health/Substance Abuse
 - Attendees noted that there are a significant number of overdoses in Lehigh, and no MHSA programs that they knew of
- Transportation
 - Affordable transportation is a large issue in Lehigh especially since many people work far away due to lack of job in Lehigh. Passport is also very expensive
- Public Facilities
 - All attendees that lived in Lehigh noted that they loved living there and regularly used the parks and recreational facilities there were available.
 - One attendee noted the need to streetlights along sidewalks.

Community Conversations and Local Government Consultation Notes

9. February 7, 2019 – Lilies Hotel, Bonita Springs

Four members of the public attended. An overview of the Con Plan, Annual Action Plan, Analysis of Impediments to Fair Housing, Community Strategic Plan, and Homeless Strategic Plan was provided. Conversation was held regarding needs in the areas of housing, economic development, homelessness, seniors, individuals with disabilities, veterans, adults, youth, transportation, fair housing, and public facilities. Attendees identified the following needs:

- **Housing**
 - Attendees discussed the need for housing at length, some key points include providing incentives and for low-income housing development (including mandating affordable housing in zoning by requiring a # of affordable housing units for every x# of market rate units), building relationships with developers, tiny house development, affordable townhomes/condos, and creating shared housing units.
- **Economic Development**
 - Attendees emphasized the need for skilled trades job training and stated that there was a large gap in the need vs. supply of workers.
 - A representative from the SWFL Community Foundation discussed the future makers coalition, which is making strides to educate youth and adults in all fields.
 - Additionally, the group recognized a need to provide education to students regarding scholarships available for technical/vocational schools.
 - The group discussed the need for façade improvements in Tice and along MLK, and potential ways to prevent gentrification if economic development occurs in those two areas. One attendee suggested research into grandfathering taxes for those who what lived in those areas for many years.
- **Homelessness**
 - The group discussed the need for Emergency Shelter beds, and other homeless services in Bonita or South Fort Myers.
 - One attendee noted there are several homeless students at FGCU, and limited resources for them near campus.
 - One attendee had feedback regarding the 2019 Point in Time Count, and stated that persons living on the street weren't sure where to go to get counted.
 - One member suggested creating more peer based street outreach to engage those living in the woods.
- **Seniors**
 - The group emphasized the need to engage seniors in fraud protection classes, and the need for transportation, in-home healthcare, and adult day cares for seniors.
 - The group discussed the implementation of multi-generational housing/communities to assist the elderly and families with children.
 - One attendee also advocated for shared housing and co-located services for veterans.
- **Youth**
 - The group discussed the need for affordable child care when schools are closed, but parents still have to go to work.
- **Fair Housing**
 - The group discussed the need for affordable housing in high opportunity areas.

Community Conversations and Local Government Consultation Notes

- The group also mentioned there is resistance (NIMBY) to a variety of service agencies who are attempting to build in high opportunity areas.
- Public Facilities
 - One attendee was very upset about state of the Pine Manor Community Garden, and stated that it needed to be re-done to include better soil and water facilities. Staff stated they would inform the Neighborhood Coordinator at Human and Veteran Services.
 - The group agreed that sidewalks in San Carlos Park are necessary for safety.
 - The group also discussed funds available for non-profit capital improvement.

10. February 13, 2019 – Local Government Consultation Meeting

Representatives from the following organizations were present:

- State Attorney's Office
- Habitat for Humanity
- Public Defender, 20th Circuit Court
- United Way of Lee, Hendry, Glades, and Okeechobee Counties
- Community Housing Resources
- Lee County Parks and Recreation
- City of Cape Coral
- Hendry County
- Lee County Human and Veteran Services
- City of Bonita Springs

The meeting was called to order at 2:05 pm. Introductions were made. The group was provided an overview of the Consolidated Planning process and previous year's funding allocations. Attendees discussed needs in the areas of housing, community and economic development, homelessness, special needs, and fair housing. The following needs were identified:

- Housing
 - Housing for those with criminal backgrounds tends to be difficult to find. There is a need for re-entry housing after persons are released from jail.
 - Without housing it is difficult to get people to 1st appearance.
 - Additionally, many employees find difficulties finding affordable housing near their place of work, and have to travel long distances to work. This is especially true on Sanibel, where workers have high costs due to tolls and very limited affordable housing on the island.
 - Affordable rental units for seniors on a fixed income is a great need in Cape Coral (and countywide), especially as there are waiting lists for most affordable housing units.
 - United Way mentioned that the primary need identified in their monthly report of needs is housing.
 - Habitat for Humanity also advocated for the need for affordable homeownership.
 - The need for housing rehabilitation was not identified as significant except for seniors on fixed incomes and possibly for some rental units throughout the County.
 - The group discussed the need to use shared, scattered site, infill, and redevelopment of existing facilities, such as old shopping centers and hotels, for affordable housing.

Community Conversations and Local Government Consultation Notes

- Economic Development
 - The City of Cape Coral referred to the Alice report, which identified that 67% of jobs in FL pay less than \$20 per hour, indicating a need for higher paying jobs.
 - Lee County Human and Veteran Services discussed the need for foundational skills in the workforce, such as timeliness and other basic skills that assist people in keeping jobs.
 - United Way mentioned a digital training program, which is assisting clients to learn the computer skills necessary obtain higher paying jobs.
 - The group mentioned a need to fund programs that develop the skills necessary to join the “in-demand” workforce, which is currently skilled trades.
- Transportation
 - Transportation is a significant barrier to maintaining improvement. HVS noted a stereotype associated with public transportation. Attendees noted the need for roadway improvements to reduce congestion. The City of Bonita Springs highlighted the need to get people out of cars, and encourage the use and creation of multi-use paths.
 - The group discussed the need for connectivity from one path to another, especially along the 41 corridor, along the Cape Coral bridges, and all main east/west and north/south routes.
 - The group also mentioned the need for safety education and improvements to ensure pedestrian and bicycle safety.
- Homelessness
 - Representatives from the 20th Circuit Court emphasized the need to better connect/reconnect people with social services and benefits, including assistance with drivers licenses and ID’s.
 - The group discussed the benefit of the expansion of the Bob Janes Triage center, but stated there was a need for engagement with case management services within the first 24 hours after entry to improve long-term outcomes.
 - The group discussed the need to increase engagement with Law Enforcement to assist with engaging homeless persons, and the need to take a more collaborative approach to assisting persons who are homeless.
- Public Services
 - The group mentioned the need to improve marketing for existing anti-poverty and public service programs. Representatives from the Circuit Court mentioned they would like to be provided materials for distribution in their offices.
- Youth
 - The group mentioned a need for additional youth programs especially in east Lee County.
- Public Facilities
 - The City of Bonita Springs emphasized the need for storm water drainage improvements within their jurisdiction, especially in low-income areas with aging pipes that were impact during Hurricane Irma.
 - Needs regarding parks and recreational facilities were discussed, including the shift from neighborhood parks to community parks, which place larger parks in central places for

Community Conversations and Local Government Consultation Notes

multiple neighborhoods rather than smaller parks with less amenities in each neighborhood.

- Attendees also discussed the need for better use of existing green spaces and school facilities. Stating that these locations are unable to be used by residents for recreational purposes.
- The group discussed the important of providing access to wifi in public spaces.
- Fair Housing
 - The group discussed the disparities in access to safe housing for vulnerable populations, including those who have mental illness and disabilities.
 - The City of Cape Coral discussed the importance of locating affordable housing throughout the region rather than concentrating it in specific areas.

At the conclusion of the meeting, the group was asked to rank the importance of all of the needs discussed. The top results were 1) Affordable housing for all populations (including persons who are homeless, disabled, have mental health and/or substance abuse issues, are justice involved, etc.) 2) Transportation, and 3) Public Facilities.

11. February 25, 2019 – God’s Table, Fort Myers Beach

Four members of the public attended. An overview of the Con Plan, Annual Action Plan, Analysis of Impediments to Fair Housing, Community Strategic Plan, and Homeless Strategic Plan was provided. Conversation was held regarding needs in the areas of housing, economic development, homelessness, seniors, individuals with disabilities, veterans, adults, youth, transportation, fair housing, and public facilities. Attendees identified the following needs:

- Housing
 - Attendees discussed the need for housing at length; some key points include the lack of year round affordable rentals on the beach. The group advocated for shared housing, and improving access to housing for seniors.
- Transportation
 - The group discussed inefficient bus routes and limited connects to and from the beach.
- Economic Development
 - The group discussed the need for additional skilled trades and concerns over the aging workforce.
- Homelessness
 - The group discussed the need for Emergency Shelter beds, and other homeless services, especially mental health services on the Beach.
- Special Needs Populations
 - There are a large number of Veteran’s that seek food and services on the Beach.
 - Many units on the beach are not accessible, and there are limited social activities for elderly.
 - There are a large number of AA and NA programs on the Beach.
- Public Facilities
 - The group discussed the need for turtle safe lighting along Estero Blvd., and increased bike safety.

Community Conversations and Local Government Consultation Notes

12. March 11, 2019 – Affordable Housing Committee, Lee County DCD

Six members of the Affordable Housing Committee and three of the public attended. An overview of the Con Plan, Annual Action Plan, Analysis of Impediments to Fair Housing, Community Strategic Plan, and Homeless Strategic Plan was provided. Conversation was held regarding needs in the areas of housing, economic development, homelessness, seniors, individuals with disabilities, veterans, adults, youth, transportation, fair housing, and public facilities. Attendees identified the following needs:

- The most common housing problem is cost.
- The elderly /low income and those with special needs or health issues.
- Many persons with limited English proficiency are unaware or unable to access services and help.
- The Hispanic population is often concentrated in manufactured housing/mobile homes; the same is true of very low-income elderly.
- The larger unit with three or more bedrooms is most lacking.
- Zoning and parking requirements impede large unit development.
- Lee County generally has a good quality-housing product with various price points and locations. Low-income areas have a preponderance of substandard housing.
- Zoning restrictions and parking requirements make it difficult to develop larger rental units. These are also more difficult to manage and maintain. Overcrowding of available 2br units is common. The lack of public transit and housing near employment nodes complicates the lifestyle of low-income households.

1. March 14, 2019 – CAA/NDC

There were twelve members of the CAA/NDC and ten members of the public present. The preliminary results of the previous community conversation meetings were discussed. An overview of the Con Plan, Annual Plan and Fair Housing plan and current year funding was provided. Additional information was provided about the Community Services Block Grant. The CAA/NDC committee comments and suggestions are essential to the plan. Attendees were asked to complete a survey by ranking their top priorities in each area, including housing, economic development, fair housing, and others.

Grantee Unique Appendices

2019 Annual Action Plan County Project Location Map

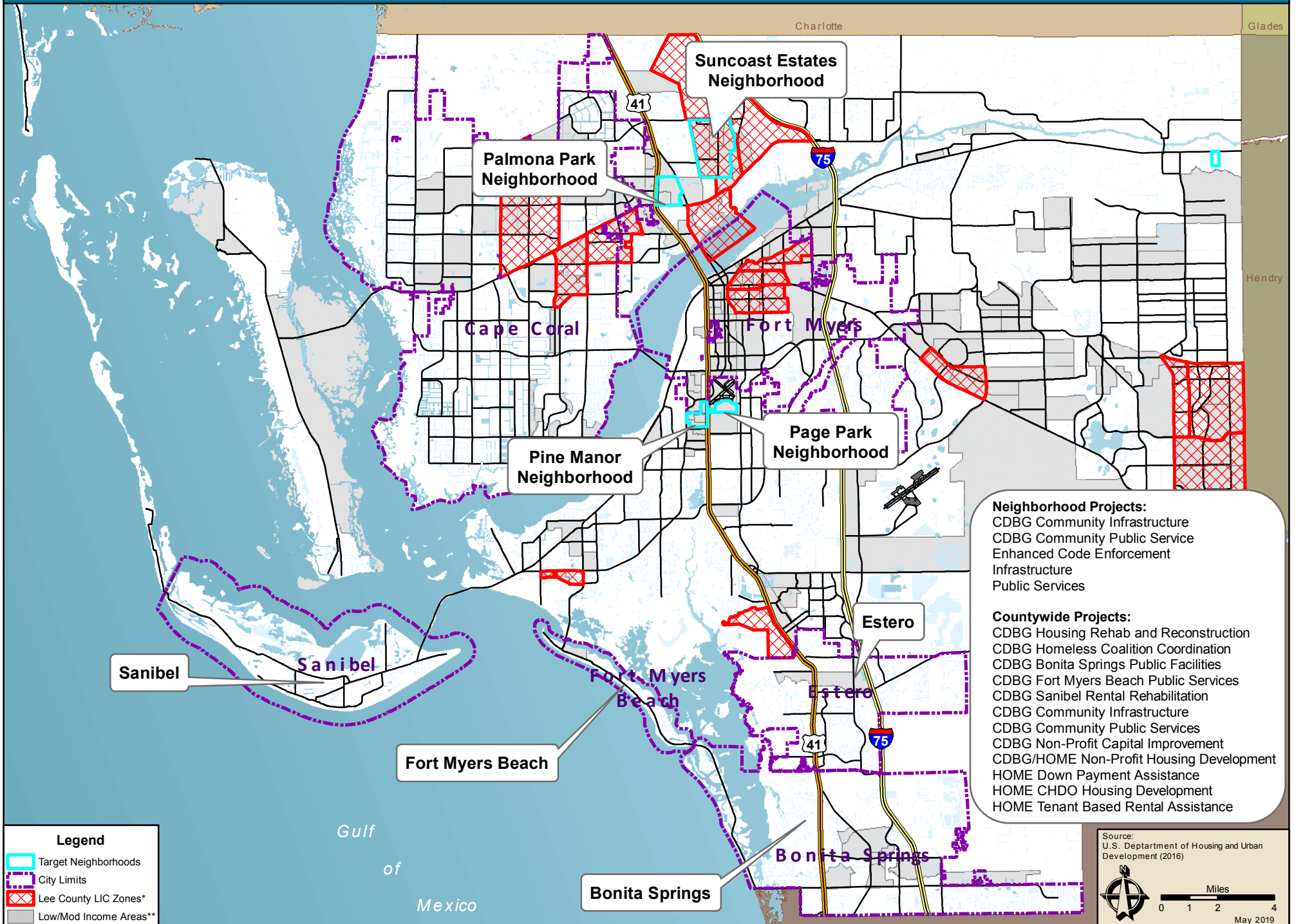
2019 Annual Action Plan Low Income Areas and Hispanic Concentration Map

2019 Annual Action Plan Low Income Areas and Minority Concentration Map

Written Standards for CoC and ESG Projects

Green House Gas (GHG) Inventory for Lee County

FY 2019 Project Locations



- Neighborhood Projects:**
- CDBG Community Infrastructure
 - CDBG Community Public Service
 - Enhanced Code Enforcement
 - Infrastructure
 - Public Services
- Countywide Projects:**
- CDBG Housing Rehab and Reconstruction
 - CDBG Homeless Coalition Coordination
 - CDBG Bonita Springs Public Facilities
 - CDBG Fort Myers Beach Public Services
 - CDBG Sanibel Rental Rehabilitation
 - CDBG Community Infrastructure
 - CDBG Community Public Services
 - CDBG Non-Profit Capital Improvement
 - CDBG/HOME Non-Profit Housing Development
 - HOME Down Payment Assistance
 - HOME CHDO Housing Development
 - HOME Tenant Based Rental Assistance

Legend

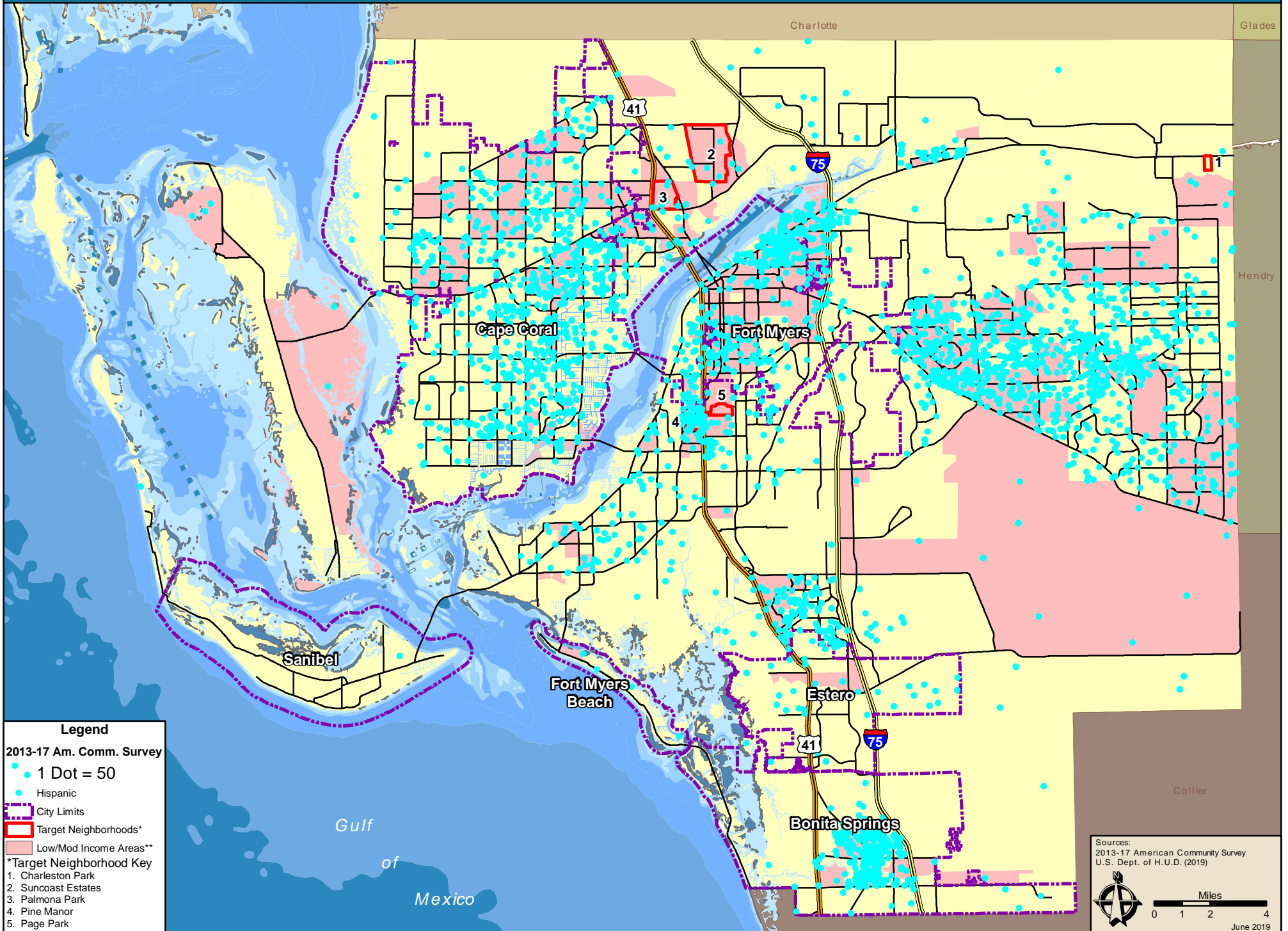
- Target Neighborhoods
- City Limits
- Lee County LIC Zones*
- Low/Mod Income Areas**

Source:
U.S. Department of Housing and Urban
Development (2016)

0 1 2 4
Miles
May 2019

*Low-Income Census (LIC) Tract: At least 20% of the population lives below the poverty line or the median family income of the tract does not exceed 80% of the area's median family income
 **Low/Mod Income Areas are areas that are 80% or less of the (AMI) Area Median Income

Hispanic Concentration



Legend

2013-17 Am. Comm. Survey

- 1 Dot = 50
- Hispanic
- City Limits
- Target Neighborhoods*
- Low/Mod Income Areas**

*Target Neighborhood Key

1. Charleston Park
2. Suncoast Estates
3. Palmona Park
4. Pine Manor
5. Page Park

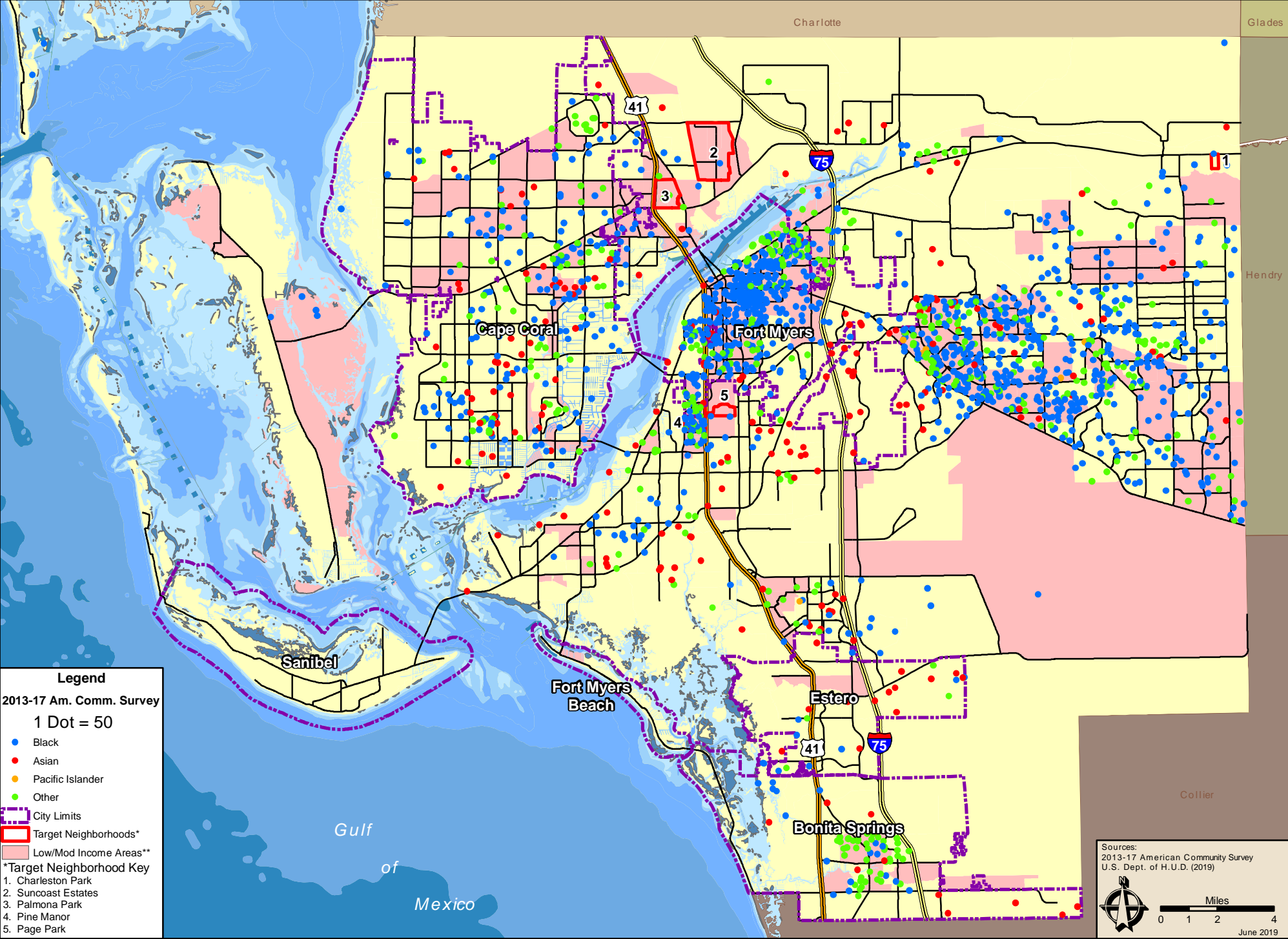
Sources:
2013-17 American Community Survey
U.S. Dept. of H.U.D. (2019)

Miles
0 1 2 4

June 2019

**Low/Mod Income Areas are areas that are 80% or less of the (AMI) Area Median Income

Minority Concentration



Legend

2013-17 Am. Comm. Survey
1 Dot = 50

- Black
- Asian
- Pacific Islander
- Other
- City Limits
- Target Neighborhoods*
- Low/Mod Income Areas**

*Target Neighborhood Key

1. Charleston Park
2. Suncoast Estates
3. Palmona Park
4. Pine Manor
5. Page Park

Sources:
2013-17 American Community Survey
U.S. Dept. of H.U.D. (2019)

Miles
0 1 2 4

June 2019

**Low/Mod Income Areas are areas that are 80% or less of the (AMI) Area Median Income



Written Standards and Coordinated Entry Policies and Procedures

**Approved by the Lee County CoC Governing
Board on January 17, 2018**

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OVERVIEW

The Homeless Emergency Assistance and Rapid Transition to Housing (HEARTH) Act of 2009 reauthorized the McKinney-Vento Homeless Assistance programs. Through the enactment of the HEARTH Act, the Department of Housing and Urban Development (HUD) published the new Continuum of Care (CoC) Program interim rule (24 CFR Part 578). The CoC Program interim rule requires that the CoC establish and consistently follow written standards for providing CoC assistance, in consultation with recipients of the Emergency Solutions Grant (ESG) program. At a minimum, these written standards must include:

- Policies and procedures for evaluating individuals' and families' eligibility for assistance in all CoC and ESG programs.
- Policies and procedures for determining and prioritizing which eligible individuals and families will receive assistance through homelessness prevention, diversion, street outreach, emergency shelter, rental assistance, permanent supportive housing assistance, transitional housing assistance, joint transitional housing to rapid re-housing, and rapid re-housing assistance.
- Policies and procedures for coordination among emergency shelter providers, essential services providers, homelessness prevention, and rapid re-housing assistance providers; other homeless assistance providers; and mainstream service and housing providers.
- Standards for determining what percentage or amount of rent and utilities costs each program participant must pay while receiving homelessness prevention, rental assistance, or rapid re-housing assistance.
- Standards for determining how long a particular program participant will be provided with rental assistance and whether and how the amount of that assistance will be adjusted over time; and
- Standards for determining the type, amount, and duration of housing stabilization and/or relocation services to provide to a program participant, including the limits, if any, on the homelessness prevention or rapid re-housing assistance that each program participant may receive, such as the maximum amount of assistance, maximum number of months the program participant receive assistance; or the maximum number of times the program participant may receive assistance.

In addition, 24 CFR 578.7(a)(8) and CPD-17-01 requires the Lee County Continuum of Care (CoC) to establish and operate a Coordinated Entry System (CES) that provides an initial, comprehensive assessment of the needs of individuals and families for housing and services. Coordinated Entry is designed to provide standardized access and assessment, and coordinate housing and services for individuals and families experiencing homelessness. Coordinated Entry facilitates referrals and housing placements to ensure that individuals and families experiencing homelessness receive appropriate assistance with both immediate and long-term housing and service needs.

The Lee County CoC agrees that these standards must be applied consistently across the entire CoC defined geographic area. Additionally, Lee County CoC members agree to administer their assistance in compliance with the CoC's written standards upon award of CoC, ESG or other applicable funds. Recipients and sub-recipients of CoC, ESG and other applicable funds may develop additional standards for administering program assistance, but these additional standards cannot be in conflict with those established by the Lee County CoC, the CoC Program interim rule, or any other federal guidance.

DEFINITIONS

HOUSING FIRST

The *Housing First* approach is a data driven solution to homelessness. *Housing First* approaches feature direct, or nearly direct, placement of targeted homeless people into permanent housing where supportive services are offered to maximize housing stability and prevent returns to homelessness as opposed to addressing predetermined treatment goals prior to permanent housing entry. *Housing First* approaches ensure that the risk factors that make finding and maintaining housing more challenging are used to screen people into assistance rather than screening them out.

Housing First requires that program participants are not screened out based on:

- Having too little or no income;
- Active or history of substance use;
- Type or extent of disability related support needed;
- Resistance to receiving services;
- History of eviction, poor credit, lease violations, or no lease history;
- Having a criminal record with exceptions for state-mandated restrictions; or
- History of victimization (e.g. domestic violence, sexual assault, childhood abuse).

Additionally, *Housing First* programs must ensure that participants are not terminated from the program for:

- Failure to participate in supportive services;
- Failure to make progress on a service plan;
- Loss of income or failure to improve income; or
- Any other activity not covered in a lease agreement typically found for unassisted persons in the Lee County.

All Lee County CoC service providers are required to implement a *Housing First* approach that ensures low barrier program entry and the provision of optional supportive services, both during and post-housing, that promote housing stability and overall well-being.

SEVERITY OF SERVICE NEEDS

In General, persons identified as having the most severe service needs, are those individuals or families for whom at least one of the following is true:

- History of high utilization of crisis services, which include but are not limited to, emergency rooms, jails, and psychiatric facilities; and/or
- Significant health or behavioral health challenges, substance use disorders, or functional impairments which require a significant level of support in order to maintain permanent housing.
- For youth and victims of domestic violence, high risk of continued trauma or high-risk of harm or exposure to very dangerous living situations.

CATEGORY 1: LITERALLY HOMELESS

- (1) Individual or family who lacks a fixed, regular, and adequate nighttime residence, meaning: (i) Has a primary nighttime residence that is a public or private place not meant for human habitation; (ii) Is living in a publicly or privately operated shelter designated to provide temporary living arrangements (including congregate shelters, transitional housing, and hotels and motels paid for by charitable organizations or by federal, state and local government programs); or (iii) Is exiting an institution where (s)he has resided for 90 days or less and who resided in an emergency shelter or place not meant for human habitation immediately before entering that institution.

Verification Requirements

- (a) Written observation by an outreach worker; or
(b) Written referral by another housing or service provider; or
(c) Certification by the individual or head of household seeking assistance state that (s)he was living on the streets or in shelter;
(d) For individuals exiting from and an institution – one of the form of evidence above, and:
a. Discharge paperwork or written/oral referral, or
b. Written record of intake worker’s due diligence to obtain above evidence and certification by individual that they exited institution.

CATEGORY 2: IMMINENT RISK OF HOMELESS

- (2) Individual or family who will imminently lose their primary nighttime residence, provided that: (i) Residence will be lost within 14 days of the date of application for homeless assistance; (ii) No subsequent residence has been identified; and (iii) The individual or family lacks the resources or support networks needed to obtain other permanent housing.

Verification Requirements

- (a) A court order resulting from an eviction action notifying the individual or family that they must leave; or
(b) For individuals and families leaving a hotel or motel – evidence that they lack the financial resources to stay; or
(c) A documented and verified oral statement; and
(d) Certification that no subsequent residence has been identified; and
(e) Self-certification or other written documentation that the individual lacks the financial resources and support necessary to obtain permanent housing.

CATEGORY 3: HOMELESS UNDER OTHER FEDERAL STATUTES

- (3) Unaccompanied youth under 25 years of age, or families with Category 3 children and youth, who do not otherwise qualify as homeless under this definition, but who: (i) Are defined as homeless under the other listed federal statutes; (ii) Have not had a lease, ownership interest, or occupancy agreement in permanent housing during the 60 days prior to the homeless assistance application; (iii) Have experienced persistent instability as measured by two moves or more during in the preceding 60 days; and (iv) Can be expected to continue in such status for an extended period of time due to special needs or barriers.

Verification Requirements

- (a) Certification by the non-profit or state or local government that the individual or head of household seeking assistance met the criteria of homelessness under another federal statute; and
(b) Certification of no PH in the last 60 days; and

- (c) Certification by the individual or head of household, and any available supporting documentation, that (S)he has moved two or more times in the past 60 days; and
- (d) Documentation of special needs or 2 or more barrier.

CATEGORY 4: FLEEING/ATTEMPTING TO FLEE DOMESTIC VIOLENCE

(4) Households who: are fleeing, or attempting to flee domestic violence; have no subsequent residence; and have no resources or support networks to obtain other permanent housing.

Verification Requirements

- (a) For victim service providers:
 - a. An oral statement by the individual or head of household seeking assistance which states; they are fleeing; they have no subsequent residence; and they lack resources. Statement must be documented by a self-certification or a certification by an intake workers.
- (b) For non-victim service providers:
 - a. Oral statement by the individual or head of household seeking assistance that they are fleeing. This statement is documented by a self-certification or by a caseworker. Where the safety of the individual or family is not jeopardized, the oral statement must be verified; and
 - b. Certification by the individual or head of household that no subsequent residence has been identified; and
 - c. Self-certification, or other written documentation, that the individual or family lacks the financial resources and support networks to obtain other permanent housing.

CHRONICALLY HOMELESS

The definition of “chronically homeless”, as stated in Definition of Chronically Homeless final rule is:

- (a) A “homeless individual with a disability,” as defined in Section 401(9) of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11360(9)), who:
 - i. lives in a place not meant for human habitation, a safe haven, or in a an emergency shelter; **and**
 - ii. has been homeless and living a described in paragraph (a)(i) continuously for at least 12 months or on at least four separate occasions in the last 3 years, as long as the combined occasions equal at least 12 months and each break in homelessness separating the occasions included at least 7 consecutive nights of not living as described in paragraph (a)(i). Status in institutional care facilities for fewer than 90 days will not constitute as a break in homelessness, but rather such stays are included in the 12-month total, as long as the individual was living or residing in a place not meant for human habitation, a safe haven, or an emergency shelter immediately before entering an institutional care facility;
- (b) An individual who has been residing in an institutional care facility, including a jail, substance abuse or mental health treatment facility, hospital, or other similar facility, for fewer than 90 days and met all of the criteria in paragraph (a) of this definition, before entering the facility;
- (c) A family with an adult head of household (or if there is no adult in the family, a minor head of household) who meets all of the criteria in paragraph (a) or (b) of this definition (as described in Section I.D.2.(a) of Notice CPD-16-11), including a family whose composition has fluctuated while the head of household has been homeless.

Verification Requirements

In accordance with 24 CFR 578.1036(a)(4), all recipients of dedicated and non-dedicated CoC Program-funded PSH must obtain documentation to verify that an individual or family is chronically homeless for the purposes of eligibility.

CROSS-CUTTING REQUIREMENTS

VIOLENCE AGAINST WOMEN ACT OF 2013 (VAWA)

On November 16, 2016 the U.S. Department of Housing and Urban Development published the final rule regarding housing protections for victims of domestic violence, dating violence, sexual assault, or stalking (Federal Register Document #2016-25888). This final rule prohibits an applicant for assistance or tenant assisted under a covered housing program from being denied assistance under, denied admission to, terminated from participation in, or evicted from housing on the basis or as a direct result of the fact that the applicant or tenant is or has been a victim of domestic violence, dating violence, sexual assault or stalking, so long as the applicant otherwise qualifies for admission, assistance, participation or occupation (24 CFR 5.2005 (b)(1)).

In addition, the VAWA Final Rule requires that each covered housing provider produce a detailed emergency transfer plan, which ensures that a tenant receiving rental assistance through or residing in a unit subsidized under a covered housing program who is a victim of domestic violence, dating violence, sexual assault, or stalking qualifies for an emergency transfer within the criteria stated in 24 CFR 5.2005 (e)(2). Lee County's Emergency Transfer plan, Attachment 1, encompasses all CoC, Emergency Solutions Grant (ESG), and HOME funded programs. All covered housing providers must maintain records on emergency transfers requested under 24 CFR 5.2005(e). Data must include the outcomes of each request, and must be provided to Lee County upon request.

VAWA in no way limits the authority of the covered housing program to terminate assistance or evict a tenant under a covered housing program if the provider can demonstrate that an actual and imminent threat to other tenants or those employed at or providing service to the property of the covered housing provider would be present if that tenant is not evicted or terminated (24 CFR 5.2005 (d)(3)).

EDUCATIONAL SERVICES

All Lee County CoC service providers must have written policies in place which ensure that individuals and families who become homeless are informed of their eligibility for and receive access to educational services. These policies should include how homeless families with children will be informed of and referred to the Lee County School Districts homeless students program, A.C.C.E.S.S. Such policies should also include information for all homeless individuals and families regarding local technical schools and universities, which may offer programs and assistance for persons who are homeless.

Additionally, programs that specifically serve families with children must have a staff person designated as the education liaison that will ensure that children are enrolled in school and connected to the A.C.C.E.S.S. program, as well as Head Start, if applicable.

COORDINATION WITH MAINSTREAM SERVICES

A primary function of case management is to make and coordinate referrals with community resources and mainstream services such as: Food Stamps, Medicaid, Child Care, SSI/SSDI, Veteran's Services, Section 8 Housing, mental health services, abuse services, etc. Staff from all funded agencies are required to make referrals and ensure clients access the referred services. Staff must also make necessary accommodations to ensure that clients needing additional assistance to utilize services have the necessary resources. Client files from funded agencies will be monitored to ensure that referrals and accommodations are appropriate, consistent, and timely.

HOMELESS MANAGEMENT INFORMATION SYSTEM (HMIS)

All projects funded by or through Lee County Human and Veteran Services must ensure that data on all persons served and all activities assisted are entered into the community-wide HMIS, Client Services Network (CSN), in accordance with HUD's standards on participation, data collection, and reporting under a local HMIS. If the recipient of funds is a victim service provider or a legal services provider, it may use a comparable database that collects client-level data over time (i.e., longitudinal data) and generates unduplicated aggregate reports based on the data. Information entered into a comparable database must not be entered directly into HMIS.

ENVIRONMENTAL REVIEWS

Lee County Human and Veteran Services serves as the responsible entity, and will perform environmental reviews for applicable projects in accordance with 24 CFR Part 58.

CoC funded projects that consist only of leasing or rental assistance activities require a "limited scope" environmental review. The limited scope review need only analyze applicable environmental laws and authorities and may document that the project is in compliance with others without analysis. A limited scope review is appropriate only if the project consists entirely of leasing or rental assistance activities in existing residential buildings without any associated physical impacts, including repairs, rehabilitation, or new construction.

Lee County Human and Veteran will perform limited scope reviews for all CoC rental assistance activities which do not consist of any repairs, rehabilitation, or new construction using the "Limited Scope Environmental Review Instructions – Continuum of Care (CoC)" and "Limited Scope Environmental Review Format – Continuum of Care (CoC)" supplied by HUD.

NONDISCRIMINATION AND EQUAL OPPORTUNITIES

The Lee County CoC operates the coordinated entry system in accordance with all federal statutes including, but not limited to: the Fair Housing Act, Title VI of the Civil Rights Act, Section 504 of the Rehabilitation Act, and Title II and Title III of the Americans with Disabilities Act. All service providers, where assistance is provided through Community Planning and Development (CPD) programs, including assistance under the: HOME Investment Partnerships program (24 CFR part 92), Housing Trust Fund program (24 CFR part 93), Community Development Block Grant program (24 CFR part 570), Housing Opportunities for Persons With AIDS program (24 CFR part 574), Emergency Solutions Grants program (24 CFR part 576), Continuum of Care program (24 CFR part 578), or Rural Housing Stability Assistance Program (24 CFR part 579), must ensure equal access to the HUD-assisted program in accordance with all general HUD program requirements as specified in 24 CFR Part 5.

Lee County Continuum of Care Witten Standards and Coordinated Entry Policies and Procedures

Last Updated: January 1, 2018 Revision: Original

Lee County CoC requires service providers to practice a person-centered model that incorporates participant choice and inclusion of all homeless subpopulations present in Lee County, including homeless veterans, youth, and families with children, individual adults, seniors, victims of domestic violence, and Lesbian, Gay, Bisexual, Transgender, Queer or Questioning, and Intersex (LGBTQI) individuals and families.

All CoC and ESG funded service providers must ensure that all persons have fair and equal access to the coordinated entry process and all forms of assistance regardless of race, ethnicity, national origin, age, sex, familial status, religious preference, disability, type or amount of disability, gender identity, perceived gender identity, marital status, sexual orientation, or perceived sexual orientation.

Additionally, service providers must maintain compliance with the HEARTH Act's involuntary family separation provision (42 USC 11361a), which ensures that emergency shelters, transitional housing, and permanent housing (PSH and RRH) providers within the CoC do not deny admission to or separate any family members from other members of their family based on age, sex, marital status, gender, gender identity, perceived gender identity, sexual orientation, or disability, when entering shelter or housing.

REASONABLE ACCOMMODATIONS

The Lee County CoC ensures that persons with disabilities have equal access to the Coordinated Entry System through compliance with the requirements of Title II and Title III of the Americans with Disabilities Act. Lee County does not discriminate against individuals with disabilities on the basis of disability in the County's services, programs, or activities.

To request an auxiliary aid or service for effective communication or a reasonable modification clients may contact Lee County Human and Veteran Services at 239-533-7900 or the service provider from which they are seeking assistance. Persons needing translation services should contact Lee County Human and Veteran Services at 239-533-7900 or the service provider from which they are seeking assistance. Accommodations and translation services will be provided at no cost to the requestor.

All coordinated entry access points must be accessible for persons with disabilities, include those who use wheelchairs and those who are least likely to access homeless assistance. Upon request, all agencies must provide appropriate and reasonable accommodations for persons with disabilities and/or Limited English Proficiency (LEP) so they can participate equally in the Coordinated Entry process, including qualified language interpreters, and other ways of making information and communications accessible to people who have speech, hearing or vision impairments, disabilities, or those with LEP.

RECORDKEEPING

All projects must maintain and follow written intake procedures to ensure compliance with the homeless definition in §576.2. The procedures must establish the order of priority for obtaining evidence as third-party documentation first, intake worker observations second, and certification from the person seeking assistance third.

Documentation of intake must include evidence relied upon to establish and verify homeless status; however, lack of third-party documentation must not prevent an individual or family from being immediately admitted to emergency shelter, receiving street outreach services, or being immediately admitted to shelter or receiving services provided by a victim service provider. Records contained in an HMIS or comparable database used by victim service or legal service providers are acceptable evidence of third-party documentation and intake

worker observations if the HMIS retains an auditable history of all entries, including the person who entered the data, the date of entry, and the change made; and if the HMIS prevents overrides or changes of the dates on which entries are made.

STRATEGY FOR ENSURING COMPLIANCE

CoC and ESG funded service providers will be monitored annually by Lee County to ensure compliance with the standards and laws listed here within. The monitoring will include a review of the provider policies, procedures, and practices to ensure compliance with all federal regulations, laws, standards, rules, and any other local policies applicable to the program being monitored. The monitoring report will include any findings or concerns related applicable laws, standards, and rules specified here within.

CORE ELEMENTS OF THE COORDINATED ENTRY SYSTEM

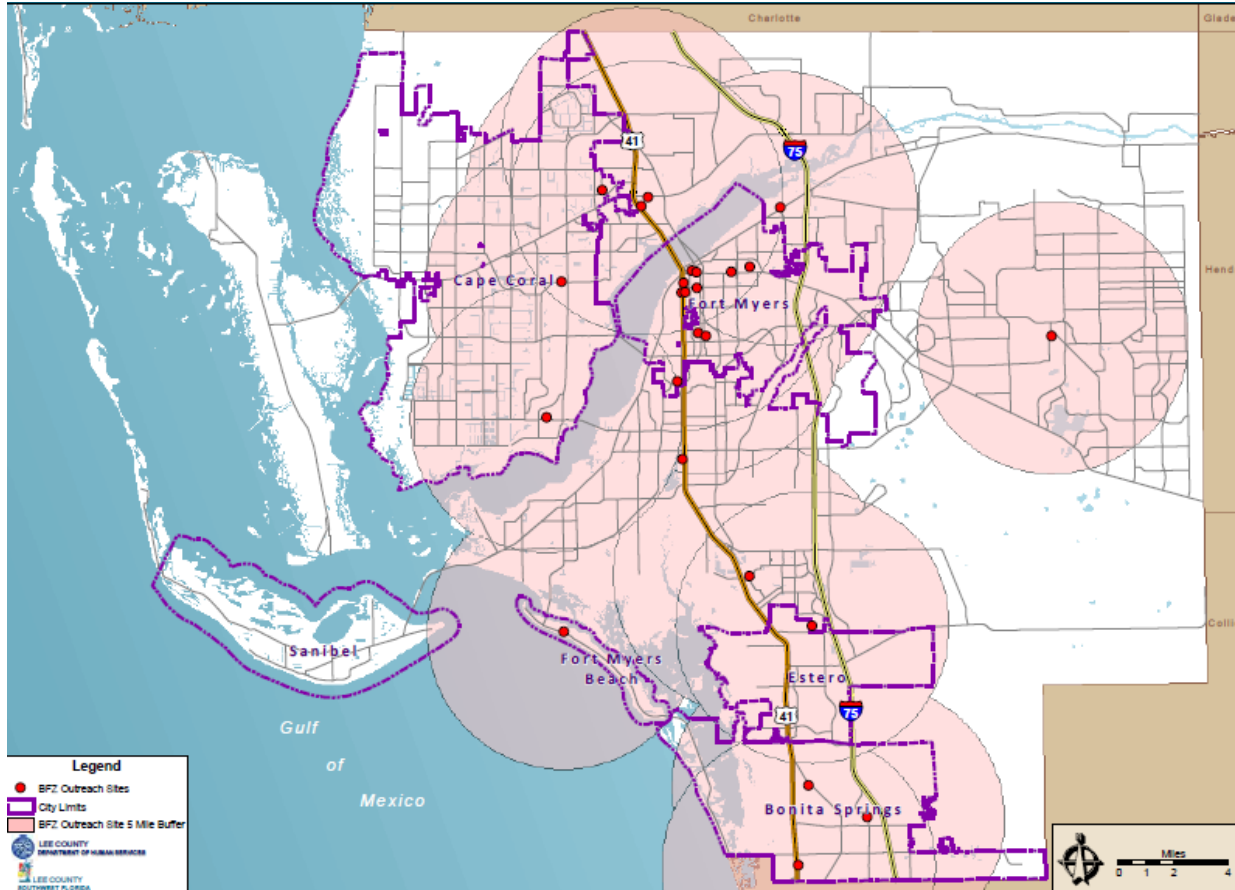
The Lee County CoC Coordinated Entry process has four distinct elements: *access, assessment, prioritization, and referral*. The goals of the Coordinated Entry System are to provide:

- **Access**
 - By ensuring that clients know how and where to gain access and receive assistance as efficiently and effectively as possible.
- **Assessment**
 - By ensuring all clients receive standardized assessments and experiences when seeking assistance throughout the CoC, and
 - By ensuring clarity, transparency, consistency, and accountability for homeless clients, referral sources, and homeless service providers throughout the assessment process.
- **Prioritization**
 - By ensuring that clients who have the longest instances of homelessness and/or are the most vulnerable have priority access to limited resources.
- **Referral**
 - By ensuring clients are referred to the type of intervention most appropriate to their immediate and long-term housing and service needs, and
 - By ensuring CoC resources are being used to their full capacity to meet the needs of individuals and families who are homeless.

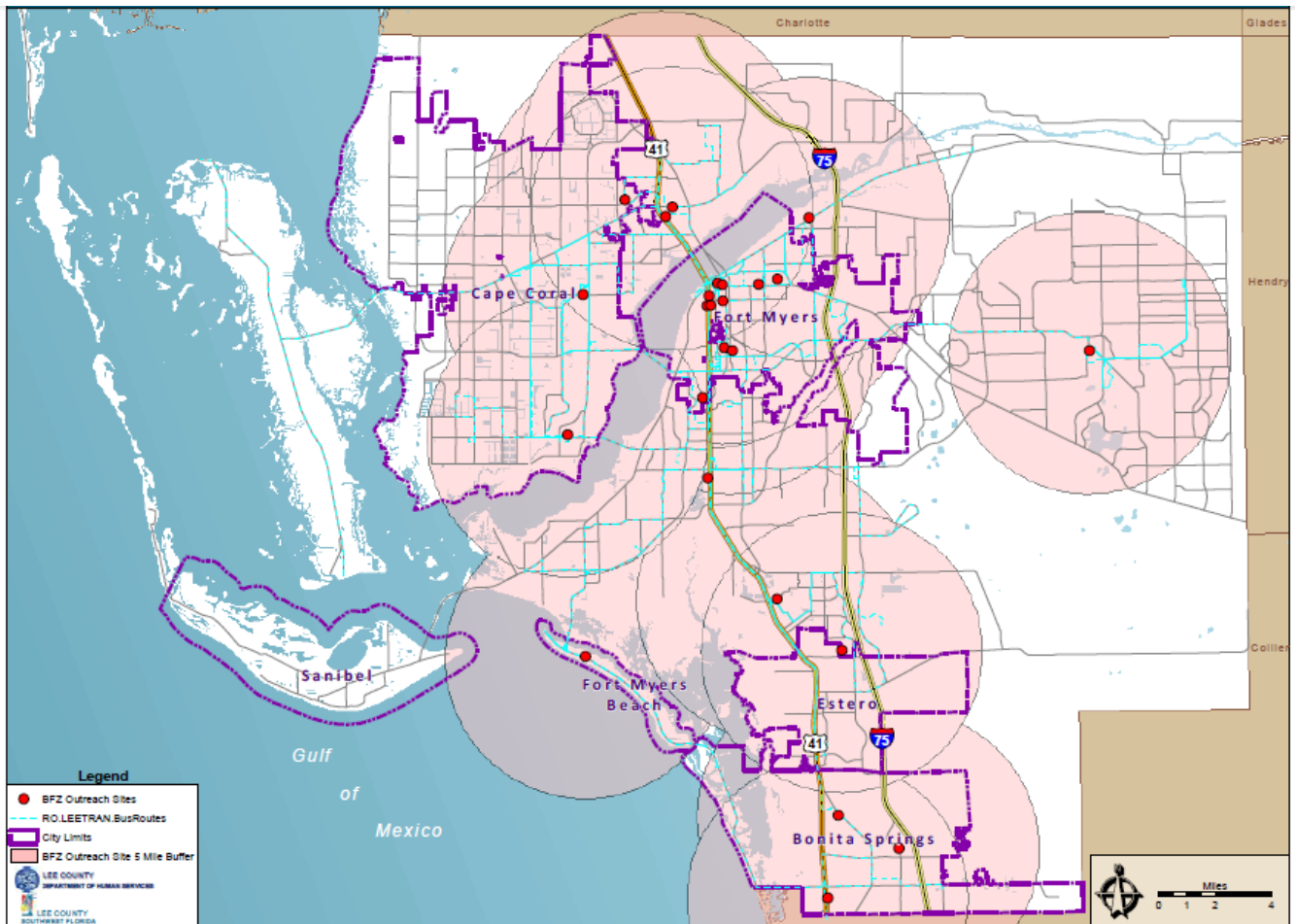
ACCESS

The Lee County CoC embraces a “no-wrong-door” approach to ensure that any person who is homeless and seeking assistance has access to the Coordinated Entry System. There are currently 23 points of access located throughout Lee County that provide the same assessment approach for all persons.

Geographic Distribution of Coordinated Entry Access Points



Geographic Distribution of Coordinated Entry Access Points in Relationship to Public Transportation (LeeTran) Routes



AFFIRMATIVE MARKETING STRATEGY

The Coordinated Entry Affirmative Marketing Strategy (CEAMS) is a communication and management strategy designed to make the coordinated entry access points and CoC housing and services accessible to all persons regardless of sex, gender identity, perceived gender identity, sexual orientation, perceived sexual orientation, age, color, national origin, ethnicity, limited English proficiency, disability status, family status, marital status, or religion.

All providers participating in the coordinated entry system (CES) shall:

1. Identify special populations and subpopulations in the CoC jurisdiction who are eligible for CES services but have historically not participated, enrolled, and entered in CoC programs in rates commensurate with overall subpopulation prevalence.
2. Outline an outreach program that includes special measures designed to attract those groups identified as least likely to apply and other efforts designed to attract persons from the total population.
3. The effectiveness of the marketing program can be determined by noting if the program effectively attracted persons experiencing homelessness who are:
 - a. From minority groups, regardless of gender, as represented in the population of the CoC jurisdiction;
 - b. Persons with disabilities and their families;
 - c. Persons whose legal history, housing history, substance use history, behavior health status, physical health status, or any other attribute or characteristic has historically served as a barrier to gaining entry to CoC services and/or housing.

The Lee County CES shall be marketed throughout the CoC's geographic area via the Lee County and Lee County Homeless Coalition websites, social media pages, and other means as deemed appropriate. All policies and procedures related to CES shall be advertised on the Lee County HMIS page:

<http://www.leegov.com/dhs/csn/downloads>. Additional efforts to carry out the CEAMS shall include:

1. Advertising in locations or media that are used and viewed or listened to by those identified as least likely to enter CoC services and housing, such as youth, individuals who are chronically homeless, and families with children;
2. Marketing CoC services and housing to specific community, religious, support organization or other groups frequented by those least likely to enter CoC services and housing;
3. Distribution of a brochure and other printed materials, which describe the coordinated entry process to be used by persons experiencing a housing crisis to locate, identify, and access CES services.
4. Incorporating information regarding compliance with the Fair Housing Act, American's with Disabilities Act, and the CEAMS into CES training protocols.

In accordance with the Americans with Disabilities Act, Lee County does not discriminate against qualified individuals with disabilities in its services, programs, or activities. To request an auxiliary aid or service for effective communication or a reasonable modification clients may contact Lee County Human and Veteran Services at 239-533-7900 or the service provider from which they are seeking assistance. Persons needing translation services should contact Lee County Human and Veteran Services at 239-533-7900 or the service provider from which they are seeking assistance. Accommodations and translation services will be provided at no cost to the requestor.

PRIVACY PROTECTIONS & PARTICIPANT AUTONOMY

The Lee County HMIS Privacy Notice describes the privacy policy of the Lee County HMIS and the agencies participating in the Homeless Management Information System (HMIS). The notice outlines that personal information is collected only when appropriate, and no information may be used or disclose for any purpose other than for that of the program. Information may only be used or disclosed to comply with legal and other obligations. Before conducting a Coordinated Entry, the Client Informed Consent and Release of Information Authorization form must first be signed, and the client must give consent to the exchange of information on Client Services Network (CSN).

Individuals are free to decide what information they provide during the assessment process, and agencies are prohibited from denying assessment or services to individuals who refuse to provide specific information, unless that information is necessary to establish program eligibility according to program regulations. Additionally, the assessment and prioritization process cannot require disclosure of specific disabilities or diagnoses. Specific diagnosis or disability information may only be obtained for the purposes of determining program eligibility to make appropriate referrals, such as for Permanent Supportive Housing (PSH).

Individuals shall be allowed to refuse to answer assessment questions and to refuse housing and service options without retribution or limitations on their access to assistance. Should an individual reject a housing or service option they will maintain their prioritization for the next available housing or service option. The housing or service option that was rejected shall be provided to the next individual according to the prioritizations outlined in the program prioritizations here within.

Individuals who do not sign the release of information should not have an assessment completed, and shall not be denied services unless Federal statute requires collection, use, storage, and reporting of the individuals personally identifiable information as a condition of program participation.

SAFETY PLANNING

No individual may be denied access to the assessment process, supportive services, housing or other services provided by victim specific or non-victim specific service providers on the basis that an individual is or has been a victim of domestic violence, dating violence, sexual assault or stalking.

Victims of domestic violence, dating violence, sexual assault, stalking or human trafficking are not maintained in HMIS within the Lee County CoC. Individuals and families who are fleeing domestic violence, dating violence, sexual assault, stalking or human trafficking will receive an assessment via paper, which will be entered into an HMIS comparable database. Data maintained in comparable databases by victim specific service providers is reconciled to Lee County HMIS data annually.

Any person who knows, or has reasonable cause to suspect, that a child or elder is abused, abandoned, or neglected by a parent, legal custodian, caregiver, or other person responsible for the child's or elder's welfare is a mandatory reporter, as specified by [Florida Statute § 39.201\(1\)\(a\)](#), and must make a report to the Florida Abuse Hotline at 1-800-962-2873 or online at www.myflfamilies.com/service-programs/abuse-hotline/report-online. To report an allegation in Spanish or Creole, call 1-800-962-2873, for TDD (Telephone Device for the Deaf) 1-800-453-5145. This toll free number is available 24 hours a day, 7 days a week with counselors waiting to assist you. All reports are confidential.

EMERGENCY SERVICES

The Family Emergency Homeless Shelter, operated by The Salvation Army (TSA), completes client prescreening Monday through Friday from 1:00 pm to 3:00 pm. TSA provides the client with a letter stating eligibility status. Clients are admitted to the shelter via intake, which is completed Monday through Friday from 4:00 pm to 8:00 pm. Intake may occur after 8:00 pm if there are extenuating circumstances.

ACT, the local domestic violence shelter, provides services to all persons without regard to race, color, religion, national origin, gender, age, mental or physical disability, sexual orientation, citizenship, marital status, gender identity (or expression), language spoken, immigration status and any other protected class, through their 24-hour crisis hotline. The crisis hotline (239-939-3112) offers information and referrals, safety planning, and shelter admission assessments.

The Bob Janes Triage Low Demand Shelter, operated by The Salvation Army (TSA) and SalusCare, Inc., admits clients between the hours of 7:30 am and 9:00 pm through Lee County Law Enforcement Departments, and various other agencies. Clients coming from Lee Health hospitals will be admitted 24 hours per day. Initial assessments are conducted by the on-staff nurse.

ASSESSMENT

All HMIS participating agencies making client referrals in the system will be required to first complete the Coordinated Entry screen. Upon completion, the system will notify the user if a Vulnerability Index – Service Prioritization Decision Assistance Tool (VI-SPDAT) is required. Individuals that are determined to be a veterans, chronically homeless, or homeless households with children are required to complete a full VI-SPDAT. The VI-SPDAT score will determine the client’s and/or household’s needs and initial prioritization for housing resources and supportive services.

NOTE: All assessments conducted on paper must be recorded in HMIS within 48 hours of when the information was first collected.

Information gathered and prioritizations made must be consistent with [24 CFR 576.400\(e\)](#) and [24 CFR 578.7\(a\)\(9\)](#). However, the assessment tools may not produce a complete body of information necessary to determine household prioritization. For this reason, case workers or others working with homeless households may gather additional information relevant to the factors in accordance with CoC prescribed prioritization criteria to make decisions.

The Coordinated Entry process must not be used to screen people out due to perceived barrier to housing or services, including, but not limited to:

- Too little or no income;
- Active or a history of substance abuse;
- Domestic violence history;
- Resistance to receiving services;
- The type or extent of disability-related services or supports that are needed;
- History of evictions, lease violation or lack of leaseholder history;
- Criminal records; or
- Poor credit.

ASSESSOR TRAINING

The HMIS Lead Agency will provide at least one annual training opportunity, which may be in-person, a live or recorded online session, or a self-administered training, to participating staff at organizations that serve as access points or otherwise conduct assessments. Annual training opportunities will be advertised on the Lee County Human and Veteran Services webpage, Facebook page, and solicited directly to service providers in the CoC’s geographic area.

TRAINING PROTOCOLS

The purpose of the annual Coordinated Entry training is to provide all staff administering assessments with access to materials that clearly describe the methods by which assessments are to be conducted with fidelity to the CoC's coordinated entry process, including its written policies and procedures.

Coordinated entry training will include:

- Identifying clients that are appropriate for the coordinated assessment based on the information available.
- Educating clients about what to expect from the process and how to be matched with the most appropriate housing and services.
- Follow up with clients after the completion of assessment and check their status in HMIS.
- Review of most current HUD data standards and CoC Written Standards for Prioritization.
- Protocols for conducting assessments, including the CSN Policies and Procedures Manual, which provides screen-by-screen instructions for completing an assessment.
- Review of the Coordinated Entry Policies and Procedures, which include the requirements for prioritization and the criteria for uniform decision-making and referrals.
- Overview of the requirements for use of assessment information to determine prioritization and program qualification.

All training is tailored to the individual needs of the service agencies, but based primarily on the Coordinated Assessment CSN User Manual available on the HMIS webpage:

<https://www.leegov.com/dhs/csn/downloads>.

Training protocols may vary by on agency. The general Coordinated Entry System training protocols will be reviewed and updated by the Coordinated Entry Committee annually.

PRIORITIZATION

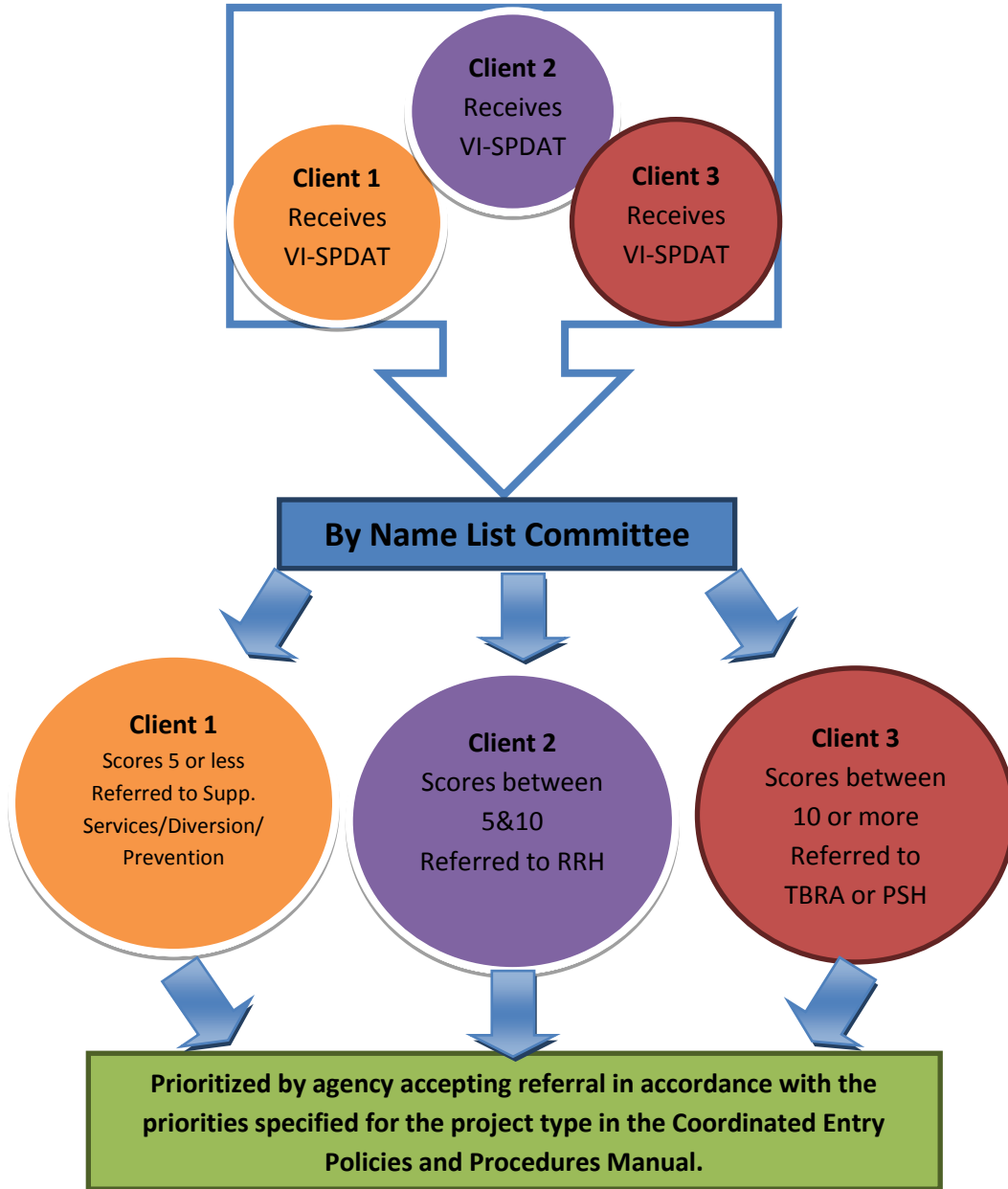
Homelessness interventions, including Street Outreach, Emergency Shelter, Diversion, Prevention, Permanent Supportive Housing, Rapid Re-Housing, Rental Assistance, Transitional Housing – Rapid Re-Housing, and Transitional Housing will be prioritized based on the severity of service needs and vulnerability. Of those eligible households the populations must be prioritized in accordance with The U.S. Interagency Council on Homelessness (USICH) plan, Opening Doors, and other HUD guidance on prioritization of chronically homeless households and policy briefs on coordinated entry systems. The basic process for Coordinated Entry and client prioritization is outlined in *Chart 1* below.

Lee County's coordinated entry system identifies prioritizes service needs as follows (only going to the next level as needed to break a tie between two or more individuals):

1. **Medical Vulnerability:** The first prioritization criteria will expedite placement into housing for individuals with severe medical needs who are at greater risk of death. This score would be based on questions 22-34 of the vulnerability analysis, with a maximum score of 5.
2. **Overall Wellness:** The second prioritization factor targets individuals with similar medical needs as criteria number 1, who will be prioritized when they have behavioral health conditions or histories of substance use, which may either mask or exacerbate medical conditions. This score will be based on questions 21 through 50 of the vulnerability analysis (i.e., the "Wellness Domain").
3. **Unsheltered Sleeping Location:** The third prioritization criteria are the location where the individual sleeps, based on question 13 of the vulnerability analysis. Unsheltered individuals will be given priority over sheltered individuals.
4. **Length of Time Homeless:** The fourth prioritization factor is the length of time an individual has experienced homelessness, giving priority to the person that has experienced homelessness the longest (based on question 1 of the vulnerability analysis).
5. **Date of vulnerability analysis assessment:** The final prioritization criteria will be the date of the individual's assessment, giving priority to the earliest date of assessment.

In all programs, priority shall be given for eligible individuals and families who are relocating as per the Emergency Transfer Plan, and in accordance with 24 CFR 576.409. All CoC funded transitional housing, rapid re-housing, and permanent supportive housing programs will ensure that applicants are prioritized according to the emergency transfer priority required under 24 CFR 578.99(j)(8).

Chart 1



PERMANENT SUPPORTIVE HOUSING

Permanent Supportive Housing (PSH) can only assist individuals with disabilities and families in which one adult or child has a disability. Supportive services designed to meet the needs of the program participants must be made available to the program participants, but should not be required as a condition to remaining in housing.

Eligibility

For permanent supportive housing programs, households must meet both the HUD definition of homelessness under **Category 1** or **Category 4**, and have a disability, as defined in Section 401(9) of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11360(9)). For beds prioritized for Chronically Homeless individuals and families, the head of household must have a qualifying disability and meet all of the criteria required as defined in 24 CFR 578.3. Once meeting the Category 1 or Category 4 and disability requirements, households are then prioritized as indicated below.

Prioritization

These priorities have been established to ensure that Lee County's most vulnerable people and high users of resources are quickly transitioned into permanent supportive housing. The Lee County CoC has established that individuals and families scoring 10 or above on the VI-SPDAT will be recommended for placement into permanent supportive housing. Individuals, and families scoring 10 or above, will then be prioritized primarily in the following order (CPD Notice 16-11), and then by severity of service needs.

For CoC or ESG funded PSH beds dedicated or prioritized for Chronically Homeless:

1. Chronically homeless individuals and families with the most severe service needs.
2. Chronically homeless individuals and families with the longest history of homelessness.
3. All other chronically homeless individuals or families.

For CoC or ESG funded PSH beds not dedicated or prioritized for Chronically Homeless, or when there are no Chronically Homeless individuals or families:

1. **First Priority**—Homeless Individuals and Families with a Disability with Long Periods of Episodic Homelessness and Severe Service Needs
 - a. An individual or family that is eligible for CoC Program-funded PSH who has experienced fewer than four occasions where they have been living or residing in a place not meant for human habitation, a safe haven, or in an emergency shelter but where the cumulative time homeless is at least 12 months **and** has been identified as having severe service needs.
2. **Second Priority**—Homeless Individuals and Families with a Disability with Severe Service Needs
 - a. An individual or family that is eligible for CoC Program-funded PSH who is residing in a place not meant for human habitation, a safe haven, or in an emergency shelter and has been identified as having severe service needs. The length of time in which households have been homeless should also be considered when prioritizing households that meet this order of priority, but there is not a minimum length of time required.
3. **Third Priority**—Homeless Individuals and Families with a Disability Coming from Places Not Meant for Human Habitation, Safe Haven, or Emergency Shelter Without Severe Service Needs
 - a. An individual or family that is eligible for CoC Program-funded PSH who is residing in a place not meant for human habitation, a safe haven, or an emergency shelter where the individual or family has not been identified as having severe service needs. The length of time in which households have been homeless should be considered when prioritizing households that meet this order of priority, but there is not a minimum length of time required.
4. **Fourth Priority**—Homeless Individuals and Families with a Disability Coming from Transitional Housing

- a. An individual or family that is eligible for CoC Program-funded PSH who is currently residing in a transitional housing project, where prior to residing in the transitional housing had lived in a place not meant for human habitation, in an emergency shelter, or safe haven. This priority also includes individuals and families residing in transitional housing who were fleeing or attempting to flee domestic violence, dating violence, sexual assault, or stalking and prior to residing in that transitional housing project even if they did not live in a place not meant for human habitation, an emergency shelter, or a safe haven prior to entry in the transitional housing.

Minimum Standards – PSH

All referrals to permanent supportive housing will be made through the coordinated entry system. The following minimum standards will be applied to all permanent housing programs:

- Support services must be made available throughout the duration of stay in housing.
- Program participants must enter into a lease agreement for a term of at least one year, which is terminable for cause. The lease must be automatically renewable upon expiration for terms that are a minimum of one month long, except on prior notice by either party.
- There is no designated length of stay for program participants.

RENTAL ASSISTANCE

Tenant, Sponsor, or Project-Based Rental Assistance can only provide assistance to individuals with disabilities and families in which one adult or child has a disability. Supportive services designed to meet the needs of the program participants must be made available to the program participants, but should not be required as a condition to remaining in housing.

Eligibility

For rental assistance programs, households must meet both the HUD definition of homelessness under **Category 1 or Category 4**. For beds prioritized for Chronically Homeless individual and families, the head of household must have a qualifying disability and meet all of the criteria required as defined in 24 CFR 578.3. Once meeting the **Category 1 or Category 4 and disability requirements**, households are then prioritized as indicated below. Programs may not establish additional eligibility requirements beyond those specified in **Category 1 and Category 4** and those required by funders.

Prioritization

These priorities have been established to ensure that Lee County's most vulnerable populations and high users of resources are quickly transitioned into permanent housing. The Lee County CoC has established that individuals and families scoring 10 or above on the VI-SPDAT will be recommended for placement into rental assistance programs.

Individuals, and families scoring 10 or above, will then be prioritized primarily in the following order, and then by severity of service needs.

1. Chronically homeless individuals and families with the most severe service needs.
2. Chronically homeless individuals and families with the longest history of homelessness.
3. All other chronically homeless individuals and families.
4. Homeless individuals and families with a disability, as defined in Section 401 of the McKinney-Vento Homeless Assistance Act as amended by S.896 the HEARTH Act of 2009, and with the most severe service needs.
5. Homeless individuals and families with long periods of continuous or episodic homelessness.
6. Homeless individuals and families coming from places not meant for human habitation (such as emergency shelters, streets, safe havens, etc.).

Minimum Standards – CoC Project Based Rental Assistance

Program participants are required to pay a portion of their rent if they are receiving CoC Program Rental Assistance, unless they have no income at all. In permanent supportive housing and transitional housing projects (24 CFR 578.77(c)), the program participant's rent contribution **must be equal to the highest of:**

- 30% of the family's monthly adjusted income (adjustment factors include allowances and deductions for disabled household members, medical expenses, childcare expenses, etc.);
- 10% of the family's monthly gross income; or
- Portion of welfare payments specifically designated by the public welfare agency to meet the family's housing costs.

Rental Assistance providers must assess each program participant's income to calculate the program participants rent contribution, and to determine the amount the recipient must pay toward rent. If the participant is required to pay for utilities, then a utility allowance must be factored into the rent calculation determination.

Minimum Standards – HOME Tenant Based Rental Assistance

Housing selected should not exceed Fair Market Value (FMV) and most importantly, affordable to the client according to household size and income. Per 24 CFR Part 92.252, HUD provides the following maximum HOME rent limits.

The maximum HOME rents are the lesser of:

- 1) The fair market rent for existing housing for comparable units in the area as established by HUD under 24 CFR 888.111; or
- 2) A rent that does not exceed 30 percent of the adjusted income of a family whose annual income equals 65 percent of the median income for the area, as determined by HUD, with adjustments for number of bedrooms in the unit.

The HOME rent limits provided by HUD will include average occupancy per unit and adjusted income assumptions. If staff cannot locate, or if the client needs, housing that exceeds FMV, County Homeless (or other non-federal funds) may be used or the client may pay the difference, if able.

Program participants are required to pay a portion of their rent if they are receiving rental assistance, unless they have no income at all. Rental Assistance providers must assess each program participant's income to calculate the program participants rent contribution, and to determine the amount the recipient must pay toward rent. If the participant is required to pay for utilities, then a utility allowance must be factored into the rent calculation determination.

Minimum Standards – Supportive Services for Veteran Families (SSVF)

Direct referrals will be made for veterans served through Supportive Services for Veteran Families (SSVF) due to the amount of funding currently available for the program. SSVF will continue to prioritize placements based on the vulnerability analysis scores, and continue to work with providers to streamline processes in order to make progress towards accepting referrals.

RAPID RE-HOUSING

Continuum of Care funds may provide supportive services, as set forth in § 578.53, and/or short-term (up to 3 months) and/or medium-term (for 3 to 24 months) tenant-based rental assistance, as set forth in § 578.51(c), as necessary to help a homeless individual or family, with or without disabilities, move as quickly as possible into permanent housing and achieve stability in that housing. When providing short-term and/or medium-term rental assistance to program participants, the rental assistance is subject to § 578.51(a)(1), but not § 578.51(a)(1)(i) and (ii); (a)(2); (c) and (f) through (i); and (l)(1).

Eligibility

For rapid re-housing programs, households must meet the HUD's definition of homelessness under **Category 1 or 4**, any subsequent CoC Program Notice of Funding Availability (NOFA) eligibility requirements, and any additional funder eligibility requirements.

Prioritization

These priorities have been established to ensure that Lee County's most vulnerable populations and high users of resources are quickly transitioned into rapid re-housing. The Lee County CoC has established that individuals and families scoring 5 to 9 on the VI-SPDAT will be recommended for placement into rapid re-housing. Individuals and families scoring above 9 on the VI-SPDAT may also be prioritized for rapid re-housing with the approval of the agency administering the project.

Individuals, and families will then be prioritized primarily in the following order, and then by severity of service needs.

1. Households with children (under 18 years of age).
2. Household fleeing domestic violence.
3. Family with head of household between ages 18-24 years of age.
4. Households with behavioral health needs.

Minimum Standards – Emergency Solutions Grant (ESG)

All referrals to rapid re-housing will be made through the coordinated entry system. The following minimum standards will be applied to all ESG funded rapid re-housing programs:

- Support services in compliance with 24 CFR Part 576.10 (ESG) must be made available throughout the duration of stay in housing.
- Program participants must enter into a written lease agreement between the owner and program participant. For ESG (24 CFR 576.104), there is no minimum lease period for TBRA. Leases for ESG PBRA must have an initial term of one year.
- For ESG maximum participation in a rapid re-housing program cannot exceed 12 months. Exceptions may be granted for an additional 12 months based on Human and Veteran Services' policy.
- Program participants must be re-evaluated not less than once annually to ensure that the type and amount of assistance being received is necessary to retain housing.
- Program participant must meet with a case manager not less than once per month to assist the program participant in ensuring long-term housing stability. The project is exempt from this requirement if the Violence Against Women Act of 1994 (42 U.S.C. 13925 et seq.) or the Family Violence Prevention and Services Act (42 U.S.C. 10401 et seq.) prohibits the recipient carrying out the project from making its housing conditional on the participant's acceptance of services.
 - Supportive Services may not be received for longer than 6 months after rental assistance has ended.

- The rent charged for a unit must be reasonable in relation to rents currently being charged for comparable units in the private unassisted market and must not be in excess of rents currently being charged by the owner for comparable unassisted units. When possible, rents shall not exceed:
 - The fair market rent for existing housing for comparable units in the area as established by HUD under 24 CFR 888.111; or
 - A rent that does not exceed 30 percent of the adjusted income of a family whose annual income equals 65 percent of the median income for the area, as determined by HUD, with adjustments for number of bedrooms in the unit.
- The amount of grant funds used to pay monthly assistance for an eligible person may not exceed the difference between:
 - The lower of the rent standard or reasonable rent for the unit; and
 - The resident's rent payment calculated under § 574.310(d).
- The amount of financial assistance granted may include all move-in costs, moving expenses, utility deposits, etc.
 - ESG Rapid Rehousing assistance pays rent at 100% for the first month, then 70% for months 2 and 3, then 60% for months 4 and 5, then 40% for months 6 and 7, then 25% for months 8, 9, and 10, then 0% for months 11 and 12.

Minimum Standards – Continuum of Care (CoC)

All referrals to rapid re-housing will be made through the coordinated entry system. The following minimum standards will be applied to all CoC funded rapid re-housing programs:

- Support services in compliance with 24 CFR 578.53 (CoC) must be made available throughout the duration of stay in housing.
- Program participants must enter into a written lease agreement between the owner and program participant. For CoC (24 CFR 578.37(a)(1)(ii)), the lease term must be at least one year, which is terminable for cause. The lease must be automatically renewable upon expiration for terms that are a minimum of one month long, except on prior notice by either party.
- For CoC maximum participation in a rapid re-housing program cannot exceed 12 months.
- Program participants must be re-evaluated not less than once annually to ensure that the type and amount of assistance being received is necessary to retain housing.
- Program participant must meet with a case manager not less than once per month (24 CFR 578.37(a)(1)(ii)(F)) to assist the program participant in ensuring long-term housing stability. The project is exempt from this requirement if the Violence Against Women Act of 1994 (42 U.S.C. 13925 et seq.) or the Family Violence Prevention and Services Act (42 U.S.C. 10401 et seq.) prohibits the recipient carrying out the project from making its housing conditional on the participant's acceptance of services.
 - Supportive Services may not be received for longer than 6 months after rental assistance has ended.
- The rent charged for a unit must be reasonable in relation to rents currently being charged for comparable units in the private unassisted market and must not be in excess of rents currently being charged by the owner for comparable unassisted units. When possible, rents shall not exceed:
 - The fair market rent for existing housing for comparable units in the area as established by HUD under 24 CFR 888.111; or
 - A rent that does not exceed 30 percent of the adjusted income of a family whose annual income equals 65 percent of the median income for the area, as determined by HUD, with adjustments for number of bedrooms in the unit.

- The amount of financial assistance granted may include all move-in costs, moving expenses, utility deposits, etc.
- CoC Rapid-Rehousing assistance pays 100% of rent costs for months 1 through 3, individuals and families receiving assistance are required to pay 10% of their income towards rent during months 4 through 8, then 20% for months 9 through 12.

JOINT TRANSITIONAL HOUSING – RAPID RE-HOUSING

Joint Transitional Housing-Rapid Re-Housing (TH-RRH) facilitates the movement of homeless individuals and families to Permanent housing (PH) within 24 months of entering TH. Grant funds may be used for acquisition, rehabilitation, new construction, leasing, rental assistance, operating costs, and supportive services.

Eligibility

For joint transitional housing to rapid re-housing programs, households must meet the HUD’s definition of homelessness under **Category 1** or **Category 4**, any subsequent CoC Program Notice of Funding Availability (NOFA) eligibility requirements, and any additional funder eligibility requirements.

Prioritization

These priorities have been established to ensure that Lee County’s most vulnerable populations and high users of resources are quickly transitioned into joint transitional housing and rapid re-housing. If multiple households meet the joint transitional housing and rapid re-housing programs individualized eligibility criteria, then prioritization will take place in the following order:

1. Households with the highest service needs
2. Length of time homeless
3. Within one of the target populations for transitional housing:
 - a. Households with children (under 18 years of age)
 - b. Household fleeing domestic violence
 - c. Family with head of household between ages 18-24 years of age
 - d. Households with behavioral health needs

Minimum Standards

All referrals to joint transitional housing and rapid re-housing must be made through the coordinated entry system. The following minimum standards will be applied to all joint transitional housing and rapid re-housing programs:

- Maximum length of stay cannot exceed 24 months.
- Assistance in transitioning to permanent housing must be made available/provided.
- Supportive services must be provided throughout the duration of stay in transitional housing.
- Program participants in transitional housing must enter into a lease, sublease or occupancy agreement for a term of at least one month. The lease, sublease or occupancy agreement must be automatically renewable upon expiration, except on prior notice by either party, up to a maximum of 24 months.

Lee County does not currently feature any Continuum of Care funded transitional housing programs. The following standards outline the basic requirements for transitional housing programs funded with funds other than the Continuum of Care, such as ESG, TANF, and Challenge Grant, and for future reference should a transitional housing program be funded in Lee County.

TRANSITIONAL HOUSING

Transitional housing (TH) facilitates the movement of homeless individuals and families to Permanent housing (PH) within 24 months of entering TH. Grant funds may be used for acquisition, rehabilitation, new construction, leasing, rental assistance, operating costs, and supportive services.

Eligibility

For transitional housing programs, households must meet the HUD's definition of homelessness under **Category 1 or Category 4**, any subsequent CoC Program Notice of Funding Availability (NOFA) eligibility requirements, and any additional funder eligibility requirements.

Prioritization

These priorities have been established to ensure that Lee County's most vulnerable populations and high users of resources are quickly transitioned into transitional housing. If multiple households meet the transitional housing programs individualized eligibility criteria, then prioritization will take place in the following order:

5. Households with the highest service needs
6. Length of time homeless
7. Within one of the target populations for transitional housing:
 - a. Households with children (under 18 years of age)
 - b. Household fleeing domestic violence
 - c. Family with head of household between ages 18-24 years of age
 - d. Households with behavioral health needs

Minimum Standards

All referrals to transitional housing must be made through the coordinated entry system. The following minimum standards will be applied to all transitional housing programs:

- Maximum length of stay cannot exceed 24 months.
- Assistance in transitioning to permanent housing must be made available/provided.
- Supportive services must be provided throughout the duration of stay in transitional housing.

Program participants in transitional housing must enter into a lease, sublease or occupancy agreement for a term of at least one month. The lease, sublease or occupancy agreement must be automatically renewable upon expiration, except on prior notice by either party, up to a maximum of 24 months.

EMERGENCY SHELTER

The Lee County CoC uses the Emergency Solutions Grant (ESG) Program to fund emergency shelter operations.

Eligibility

For emergency shelter programs, households must meet the HUD's definition of homelessness under **Category 1** or **Category 4**, any subsequent CoC Program Notice of Funding Availability (NOFA) eligibility requirements, and any additional funder eligibility requirements.

Prioritization

These priorities have been established to ensure that Lee County's most vulnerable populations and high users of resources are quickly placed into emergency shelter. If multiple households meet the emergency shelter programs individualized eligibility criteria, then prioritization will take place in the following order:

1. Households with the highest service needs
2. Length of time homeless
3. Within one of the target populations for transitional housing:
 - a. Households with children (under 18 years of age)
 - b. Household fleeing domestic violence
 - c. Family with head of household between ages 18-24 years of age
 - d. Households with behavioral health needs

Minimum Standards

All referrals to the shelter are made direct from street outreach, Lee County Law Enforcement, Lee Health or other homelessness assistance programs. The following minimum standards will be applied to all emergency shelter programs:

- Assistance in transitioning to permanent housing must be made available/provided.
- Supportive services must be made available throughout the duration of stay in the emergency shelter.

STREET OUTREACH

CoC funds may be used by recipients in Continuums of Care for street outreach within the Supportive Services Only (SSO) component as described in 24 CFR 578.37. ESG Funds may be used by grantees for street outreach as described in 24 CFR 576.101. Lee County does not currently use CoC funds for street outreach. The following standards outline the basic requirements for street outreach programs funded with funds other than the Continuum of Care, including, but not limited to Emergency Solutions Grant, Challenge Grant, Temporary Assistance for Needy Families-Prevention, and State Emergency Solutions Grant.

Street outreach efforts must be linked to the Coordinated Entry System. Lee County ensures that outreach workers have adequate access to both paper and electronic methods of administering a coordinated assessment survey with the same standardized processes offered at site-based access points.

Eligibility

Individuals and Families defined as Homeless under **Category 1, 2, or 4**, are eligible for assistance through street outreach projects.

Prioritization

These priorities have been established to ensure that Lee County's most vulnerable populations and high users of resources are quickly connected with street outreach services. Street outreach programs be targeted to households:

1. With the highest service needs
2. With the longest length of time homeless
3. Within one of the target populations:
 - a. Households with children (under 18 years of age)
 - b. Household fleeing domestic violence
 - c. Family with head of household between ages 18-24 years of age
 - d. Households with behavioral health needs

Minimum Standards

All referrals to homelessness assistance projects must be made through the coordinated entry system. Street outreach efforts must actively engage the unsheltered homeless population for the purposes of providing immediate support, interventions, and connections with homeless assistance programs and/or mainstream services. Additional minimum standards are assigned based on funding source.

PREVENTION SERVICES

CoC funds may be used by recipients in Continuums of Care which are designated as high-performing communities for housing relocation and stabilization services, as described in 24 CFR 576.105 and 24 CFR 576.106. The Lee County CoC is not currently designated as a high-performing community, and therefore does not feature a homelessness prevention program funded with CoC funds. The following standards outline the basic requirements for homelessness prevention programs funded with funds other than the Continuum of Care, such as Emergency Solutions Grant (ESG), Temporary Assistance for Needy Families (TANF)-Prevention, County General Funds, Community Services Block Grant (CSBG) and Challenge Grant, and for future reference should Lee County be designated as a high-performing community.

Lee County CoC homelessness prevention programs provide rental assistance, utility assistance, and supportive services to at risk and otherwise eligible individuals and families to prevent homelessness.

Eligibility

For homelessness prevention programs, households must meet the HUD's definition of homelessness under **Category 1, 2, or 4**, and any additional funder eligibility requirements.

Prioritization

Prioritization for homelessness prevention services are assigned based on the funding source. The Lee County CoC uses multiple funding sources, including Challenge Grant, TANF-Prevention, State of Florida ESG, CSBG, and Lee County General funds to administer homelessness prevention programs. Each individual program must outline prioritization standards based on the requirements imposed by the funder. If no funder requirements are in place, or multiple households meet the prevention program's individualized eligibility criteria, then prioritization will take place in the following order:

1. Households with the highest service needs
2. Within one of the target populations for transitional housing:
 - a. Families with children (under age 18)
 - b. Household fleeing domestic violence
 - c. Family with head of household between ages 18-24
 - d. Households with behavioral health needs

Minimum Standards

All referrals to homelessness prevention projects must be made through the coordinated entry system. Additional minimum standards are assigned based on funding source.

DIVERSION SERVICES

Diversion is implemented to ensure that scarce resources are preserved for the most vulnerable individuals and families. Diversion services provide alternative resources, encourage the development of problem solving skills, and ultimately divert individuals and families to a safe and secure temporary or permanent housing location outside of the CoC homelessness response system.

Eligibility

Individuals and Families defined as Homeless under **Category 1, 2** or **4** are eligible for assistance through diversion services.

Prioritization for diversion services is largely based on client choice. Individuals and families must first be willing to participate in mediation, and second be willing to invest time developing and implementing problem solutions. Additional priorities for diversion services may be established by service providers, so long as the policies are outlined in a written document(s) and do not conflict with any part of these standards.

Minimum Standards

All referrals services must be made through the coordinated entry system. Additional prioritization and minimum standards are assigned based on funding source.

REFERRAL

All CoC and ESG funded service providers must use the Lee County Coordinated Entry System as the only referral source from which to consider filling vacancies in housing and/or services. Referrals are made through HMIS. Participating agencies are responsible for regularly checking the referral queue and processing clients in a timely manner, and in accordance with the applicable rules and policies found here within.

BY-NAME LIST (BNL)

The Lee County CoC HMIS Lead Agency, Lee County Human and Veteran Services, shall retain and review the master by-name list at least one time per month. Persons on the by-name list will remain active for 60 days. If no contact is made after 60 days the individual will be placed in inactive status. Should contact be made while an individual is in inactive status, they will be moved to active status for another 60 day period.

BY-NAME LIST (BNL) COMMITTEE

The BNL Committee reviews all individuals and families listed, paying particular attention to high risk individuals and those where the tool did not reveal the full depth and/or urgency of the situation. Assessors/case managers utilize the CoC Written Standards and professional judgment to evaluate housing and service options. Clients may be referred to the review panel for any of these reasons regardless of whether the individual participated in the vulnerability analysis process. The BNL Committee strives to be person-centric, not program-centric (i.e., the end result will not always be PSH placement, but rather to match a highly vulnerable person to the appropriate housing resource). The Committee will make every effort to consider the individuals strengths, goals, risks, lived experiences, and choices in the referral process.

In the context of the coordinated entry process, determining eligibility is a project-level process governed by written standards as established in 24 CFR 576.400(e) and 24 CFR 578.7(a)(9). Coordinated entry processes incorporate mechanisms for determining whether potential participants meet project-specific requirements of the projects for which they are prioritized and to which they are referred.

The process of collecting required information and documentation regarding eligibility may occur at any point in the coordinated entry process as long as that eligibility information is not being used as part of prioritization and ranking (e.g. using documentation of a specific diagnosis or disability to rank a person). **The assessment process cannot require disclosure of specific disabilities or diagnosis. Specific diagnosis or disability information may only be obtained for purposes of determining program eligibility to make appropriate referrals.** Projects or units may be legally permitted to limit eligibility, e.g., to persons with disabilities, through a Federal statute which requires that assistance be utilized for a specific population, e.g., the HOPWA program, through State or local permissions in instances where Federal funding is not used and Federal civil rights laws are not violated.

BNL COMMITTEE REPRESENTATION

The Committee will be comprised of representatives from the CoC Lead Agency, the HMIS Lead Agency, and agencies funded with CoC, ESG, TANF, Challenge Grant, and other federal, state, and local funds.

Agencies funded through the Lee County Human and Veterans Services with one of the funding sources identified above MUST attend each BNL Committee Meeting.

Not all cases will have immediate placement. In some instances, the Committee may determine that the initial score and position on the registry is correct given the severity of other cases. In other situations, the Committee may determine that a higher score is warranted, though immediate placement is still not feasible. In still other situations, the Committee may determine that immediate placement is needed to reduce risk of death.

PLANNING

STAKEHOLDER CONSULTATION

The Lee County CoC and HMIS Lead Agency facilitates ongoing planning and stakeholder consultation concerning the implementation of the Coordinated Entry System through Coordinated Entry Committee and BNL Committee meetings. The Committees are intended to develop an accurate picture of the number and characteristics of Lee County persons who are homeless in order to provide targeted assistance. In addition to collecting information, objectives include developing a provider survey to establish resources and identify gaps, and provide a user group for HMIS users for training and updates.

In addition to Committee meetings, the Lee County CoC solicits feedback annually from funded agencies and households that participated in coordinated entry to gather data regarding the quality and effectiveness of the entire coordinated entry experience. Data is gathered through the following methods:

1. Surveys:
 - a. A survey will be made available to gather data from individuals who have participated in the coordinated entry system. Clients will be notified by their caseworkers that the survey is available and feedback is appreciated.
 - b. A survey to gather data from funded agencies is sent during the month of January by the Lee County Homeless Coalition. Agencies are notified via direct e-mail of the availability of the survey.
2. An annual focus session conducted during at least one Coordinated Entry Committee meeting, and at least one BNL Committee Meeting.

The Lee County CoC and HMIS Lead Agency evaluate the feedback received and make necessary updates to the coordinated entry process written policies and procedures, if necessary to improve user experience.

QUALITY EVALUATION

Annual Coordinated Entry System monitoring will be conducted by the HMIS lead agency, and will include a review of system person measures, participating agency survey data, client survey data, and adherence to the requirements of these policies. The monitoring report will be presented to the CoC Governing Board and general membership for review and feedback.

DISCHARGE PLANNING

Each CoC service provider must develop and implement, to the maximum extent practicable, policies and protocols for the discharge of persons from public funded institutions and systems of care (such as health care facilities, foster care or other youth facilities, or correction programs and institutions) in order to prevent such discharge from immediately resulting in homelessness for such persons. (42 USC 11362).

Strategy for Ensuring Compliance

CoC and ESG funded service providers will be monitored annually by Lee County to ensure compliance with the standards and laws listed above. The monitoring will ensure that appropriate discharge policies, procedures, and practices have been developed and implemented. The monitoring report will include any findings or concerns related to discharge planning.

SYSTEM PERFORMANCE

A critical aspect of the McKinney-Vento Homeless Assistance Act, (the "Act") as amended, is a focus on viewing the local homeless response as a coordinated system of homeless assistance as opposed to homeless assistance programs and funding sources that operate independently in a community. To facilitate this

perspective the Act now requires communities to measure their performance as a coordinated system in addition to analyzing performance by specific projects or project types.

With the 2016 CoC funding round, HUD introduced a series of system performance measures requiring each CoC to provide reporting that aggregates data from each individual program in response to a series of performance based elements describing the efficacy of the CoC. To this end, the Act established a set of criteria for HUD to use that require all CoCs to report their system-level performance to HUD. The intent of this criteria or “system performance measures, is to encourage CoCs and ESG program recipients, as well as all other homeless assistance stakeholders in the CoC, to regularly measure their progress in meeting the needs of people experiencing homelessness in their community and to report this progress to HUD.

The following provides the resulting system performance measures that each program—emergency, rapid rehousing, transitional and permanent housing—will similarly be measured, as applicable to program type.

	RELEVANT PROJECT TYPE*					SYSTEM PERFORMANCE MEASURES and CoC GOALS
	SO	ES	RRH	TH	PH	
1a		X	X	X	X	Length of Time Persons Remain Homeless <ul style="list-style-type: none"> Average length of time homeless persons in ES and SH. Goal: <116 Average length of time homeless persons in ES, SH, and TH. Goal: <123
2		X	X	X	X	Returns to Homelessness Measurement of clients exiting from any project type to a permanent housing destination in the date range two years prior to the production of the system performance report as follows: <ul style="list-style-type: none"> Percentage of those exiting from ES who returned to homelessness. Goal: <30% Percentage of those exiting from TH returning to homelessness. Goal: <30% Percentage of those exiting from PH returning to homelessness. Goal: <30%
3		X	X			Number of Homeless Persons Measurement of the change in the CoC’s total annual count of sheltered ES and TH homeless persons in HMIS. This metric only has relevance in the aggregate, as such, individual projects are not expected to use this measure.
4			X	X	X	Employment and Income Growth for Persons in CoC Programs during the reporting period <ul style="list-style-type: none"> Measurement of the percentage of adults (among stayers) who increased their earned income. Goal: 45% Measurement of the percentage of adult stayers who increased their non-employment cash income. Goal: 45% Measurement of the percentage of adult stayers who increased their total income Goal: 45% Measurement of the percentage of adults (among leavers) who increased their earned income. Goal: 45% Measurement of the percentage of adult leavers who increased their non-employment cash income. Goal: 45% Measurement of the percentage of adult leavers who increased their total income. Goal: 45%
5		X	X	X	X	Number of Persons who Become Homeless for the First Time <ul style="list-style-type: none"> Change in number of active participants in ES and TH projects who were not previously enrolled in HMIS. Goal: <200 Change in number of persons entering ES, TH and PH with no prior enrollment in HMIS. Goal: <200
6						Reserved.

7		X	X	X	X	<p>Successful Placement from Street Outreach and Successful Placement in or Retention of Permanent Housing.</p> <ul style="list-style-type: none"> • Measurement of the change in exits to permanent housing destinations. Goal: >65% • Measurement of the change in exits or retention of permanent housing from ES, SH, TH, and PH-RRH. Goal: >65%
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Whereas system performance measures are intended to provide a snapshot into the homeless response system as an entire coordinated initiative, project performance measures takes a closer look at each project within the CoC. The standards provided below establish the performance standards set by this CoC in assessing and evaluating each project’s performance, individually. On May 10, 2017, the CoC Governing Board established the following performance targets for all CoC and ESG funded projects:

1. 65% of persons in ES,SH, TH, or PH-RRH should be exited to permanent housing destinations
2. 45% of persons in CoC and ESG funded programs should maintain OR increase their income
3. No more than 35% of persons who were exited from CoC and ESG funded programs should return to homelessness within 1 year

APPEAL PROCESS

The CoC Written Standards outline that the most severe service needs will be determined by the household’s Coordinated Assessment and VI-SPDAT, and will prioritize those with the highest scores within each category first. In the event that two or more homeless households within the same geographic area are identically prioritized for referral to the next available unit, and each household is also eligible for referral to that unit, the household that first presented for assistance will be referred to the next available unit. In the event that an individuals or family wishes to appeal a coordinated entry score, they shall make an appeal to the Lee County Human and Veteran Services using the Applicant/Client Appeal and Grievance Policy. Appeals for program denial shall be made directly to the agency which conducts such program, according to the agencies appeal or grievance policy.

Staff administering assessments and/or the staff supervisor should address any client complaints, whether discrimination based or not, as best as they can in the moment. Complaints that should be addressed directly by the assessment staff member or assessment staff supervisor include complaints about how they were treated by assessment staff, assessment center conditions, or violation of data agreements. Any other complaints should be referred to the chair of the BNL Committee for resolution as above. Any complaints filed by a client should note their name and contact information so they can be contact by the chair.

ATTACHMENT 1

Emergency Transfer Plan for Victims of Domestic Violence, Dating Violence, Sexual Assault, or Stalking

EMERGENCY TRANSFERS

Lee County and other local CoC, HOME or ESG funded housing providers are concerned about the safety of our tenants and such concern extends to tenants who are victims of domestic violence, dating violence, sexual assault, or stalking. In accordance with the Violence Against Women Act (VAWA), Lee County along with other applicable housing providers allow tenants who are victims of domestic violence, dating violence, sexual assault, or stalking to request an emergency transfer from the tenant's current unit to another unit. The ability to request a transfer is available regardless of sex, gender identity, or sexual orientation. The ability of Lee County and other applicable housing providers to honor such request for tenants currently receiving assistance, however, may depend upon a preliminary determination that the tenant is or has been a victim of domestic violence, dating violence, sexual assault, or stalking, and on whether Lee County or other applicable housing providers has another dwelling unit that is available and is safe to offer the tenant for temporary or more permanent occupancy.

This plan identifies tenants who are eligible for an emergency transfer, the documentation needed to request an emergency transfer, confidentiality protections, how an emergency transfer may occur, and guidance to tenants on safety and security. This plan is based on a model emergency transfer plan published by the U.S. Department of Housing and Urban Development (HUD), the Federal agency that ensures that the rapid re-housing, tenant based rental assistance, and all other CoC, ESG, and HOME funded rental assistance programs are in compliance with VAWA.

ELIGIBILITY FOR EMERGENCY TRANSFERS

A tenant who is a victim of domestic violence, dating violence, sexual assault, or stalking, as provided in HUD's regulations at 24 CFR part 5, subpart L is eligible for an emergency transfer, if: the tenant reasonably believes that there is a threat of imminent harm from further violence if the tenant remains within the same unit. If the tenant is a victim of sexual assault, the tenant may also be eligible to transfer if the sexual assault occurred on the premises within the 90-calendar-day period preceding a request for an emergency transfer. A tenant requesting an emergency transfer must expressly request the transfer in accordance with the procedures described in this plan. Tenants who are not in good standing may still request an emergency transfer if they meet the eligibility requirements in this section.

EMERGENCY TRANSFER REQUEST DOCUMENTATION

To request an emergency transfer, the tenant shall notify Lee County or other applicable housing provider's management office and submit a written request for a transfer to the assigned case manager. Tenant may, but is not required, to use the Emergency Transfer Request form provided in the attached Appendix C. Lee County and other applicable housing providers will provide reasonable accommodations to this policy for individuals with disabilities. The tenant's written request for an emergency transfer should include either:

1. A statement expressing that the tenant reasonably believes that there is a threat of imminent harm from further violence if the tenant were to remain in the same dwelling unit assisted under Lee County or other applicable housing provider's program; **OR**
2. A statement that the tenant was a sexual assault victim and that the sexual assault occurred on the premises during the 90- calendar-day period preceding the tenant's request for an emergency transfer.

CONFIDENTIALITY

Lee County and other applicable housing providers will keep confidential any information that the tenant submits in requesting an emergency transfer, and information about the emergency transfer, unless the tenant gives Lee County and other applicable housing providers written permission to release the information on a time limited basis, or disclosure of the information is required by law or required for use in an eviction proceeding or hearing regarding termination of assistance from the covered program. This includes keeping confidential the new location of the dwelling unit of the tenant, if one is provided, from the person(s) that committed an act(s) of domestic violence, dating violence, sexual assault, or stalking against the tenant. See the Notice of Occupancy Rights under the Violence Against Women Act. For All Tenants, Lee County and other applicable housing providers are responsible to maintain the confidentiality of information related to incidents of domestic violence, dating violence, sexual assault, or stalking.

EMERGENCY TRANSFER TIMING AND AVAILABILITY

Lee County or other applicable housing providers cannot guarantee that a transfer request will be approved or how long it will take to process a transfer request. Lee County or other applicable housing providers will, however, act as quickly as possible to move a tenant who is a victim of domestic violence, dating violence, sexual assault, or stalking to another unit, subject to availability and safety of a unit. If a tenant reasonably believes a proposed transfer would not be safe, the tenant may request a transfer to a different unit. If a unit is available, the transferred tenant must agree to abide by the terms and conditions that govern occupancy in the unit to which the tenant has been transferred. Lee County or other applicable housing provider may be unable to transfer a tenant to a particular unit if the tenant has not or cannot establish eligibility for that unit.

If Lee County or other applicable housing providers have no safe and available units for which a tenant who needs an emergency transfer is eligible, Lee County or other applicable housing providers will assist the tenant in identifying other housing providers who may have safe and available units to which the tenant could move. At the tenant's request, Lee County or other applicable housing providers will also assist tenants in contacting the local organizations offering assistance to victims of domestic violence, dating violence, sexual assault, or stalking.

SAFETY AND SECURITY OF TENANTS

Pending processing of the transfer and the actual transfer, if it is approved and occurs, the tenant is urged to take all reasonable precautions to be safe.

Tenants who are or have been victims of domestic violence are encouraged to contact the National Domestic Violence Hotline at 1- 800-799-7233, or a local domestic violence shelter, for assistance in creating a safety plan. For persons with hearing impairments, that hotline can be accessed by calling 1- 800-787-3224 (TTY).

Tenants who have been victims of sexual assault may call the Rape, Abuse & Incest National Network's National Sexual Assault Hotline at 800-656-HOPE, or visit the online hotline at <https://ohl.rainn.org/online/>.

Tenants who are or have been victims of stalking seeking help may visit the National Center for Victims of Crime's Stalking Resource Center at [https:// www.victimsofcrime.org/our-programs/ stalking-resource-center](https://www.victimsofcrime.org/our-programs/stalking-resource-center).

APPENDIX TABLE

Appendix A	Notice of Occupancy Rights under the Violence Against Women Act
Appendix B	Certification of Domestic Violence, Dating Violence, Sexual Assault, or Stalking
Appendix C	Emergency Transfer Request for Certain Victims of Domestic Violence, Dating Violence, Sexual Assault, or Stalking

APPENDIX A

LEE COUNTY CONTINUUM OF CARE LEE COUNTY HUMAN AND VETERAN SERVICES

Notice of Occupancy Rights under the Violence Against Women Act

To all Tenants and Applicants The Violence Against Women Act (VAWA) provides protections for victims of domestic violence, dating violence, sexual assault, or stalking. VAWA protections are not only available to women, but are available equally to all individuals regardless of sex, gender identity, or sexual orientation. The U.S. Department of Housing and Urban Development (HUD) is the Federal agency that oversees that the Rapid Re-Housing, Tenant Based Rental Assistance, and all other CoC, ESG, and HOME rental assistance programs are in compliance with VAWA. This notice explains your rights under VAWA.

A HUD-approved certification form is attached to this notice. You can fill out this form to show that you are or have been a victim of domestic violence, dating violence, sexual assault, or stalking, and that you wish to use your rights under VAWA.

Protections for Applicants

If you otherwise qualify for assistance under the Rapid Re-Housing, Tenant Based Rental Assistance, or any other CoC, ESG, and HOME funded rental assistance programs, you cannot be denied admission or denied assistance because you are or have been a victim of domestic violence, dating violence, sexual assault, or stalking.

Protections for Tenants

If you are receiving assistance under the Rapid Re-Housing, Tenant Based Rental Assistance, or any other CoC, ESG, and HOME funded rental assistance programs, you may not be denied assistance, terminated from participation, or be evicted from your rental housing because you are or have been a victim of domestic violence, dating violence, sexual assault, or stalking.

Also, if you or an affiliated individual of yours is or has been the victim of domestic violence, dating violence, sexual assault, or stalking by a member of your household or any guest, you may not be denied rental assistance or occupancy rights under the Rapid Re-Housing, Tenant Based Rental Assistance, or any other CoC, ESG, and HOME funded rental assistance programs solely on the basis of criminal activity directly relating to that domestic violence, dating violence, sexual assault, or stalking.

Affiliated individual means your spouse, parent, brother, sister, or child, or a person to whom you stand in the place of a parent or guardian (for example, the affiliated individual is in your care, custody, or control); or any individual, tenant, or lawful occupant living in your household.

Removing the Abuser or Perpetrator From the Household

Lee County or any other CoC or ESG funded housing provider may divide (bifurcate) your lease in order to evict the individual or terminate the assistance of the individual who has engaged in criminal activity (the abuser or perpetrator) directly relating to domestic violence, dating violence, sexual assault, or stalking.

If Lee County or any other CoC or ESG funded housing provider chooses to remove the abuser or perpetrator, Lee County or any other CoC or ESG funded housing provider may not take away the rights of eligible tenants to the unit or otherwise punish the remaining tenants. If the evicted abuser or perpetrator was the sole tenant to have established eligibility for assistance under the program, Lee County or any other CoC or ESG funded housing provider must allow the tenant who is or has been a victim and other household members to remain in the unit for a period of time, in order to establish eligibility under the program or under another HUD housing program covered by VAWA, or, find alternative housing.

In removing the abuser or perpetrator from the household, Lee County or any other CoC or ESG funded housing provider must follow Federal, State, and local eviction procedures. In order to divide a lease, Lee County or any other CoC or ESG funded housing provider may, but is not required to, ask you for documentation or certification of the incidences of domestic violence, dating violence, sexual assault, or stalking.

Moving to Another Unit

Upon your request, Lee County or any other CoC or ESG funded housing provider may permit you to move to another unit, subject to the availability of other units, and still keep your assistance. In order to approve a request, Lee County or any other CoC or ESG funded housing provider may ask you to provide documentation that you are requesting to move because of an incidence of domestic violence, dating violence, sexual assault, or stalking. If the request is a request for emergency transfer, the housing provider may ask you to submit a written request or fill out a form where you certify that you meet the criteria for an emergency transfer under VAWA. The criteria are:

- (1) You are a victim of domestic violence, dating violence, sexual assault, or stalking.** *(If your housing provider does not already have documentation that you are a victim of domestic violence, dating violence, sexual assault, or stalking, your housing provider may ask you for such documentation, as described in the documentation section below.), AND*
- (2) You expressly request the emergency transfer.** *(Your housing provider may choose to require that you submit a form, or may accept another written or oral request.), AND*

APPENDIX A

(3a) You reasonably believe you are threatened with imminent harm from further violence if you remain in your current unit. *(This means you have a reason to fear that if you do not receive a transfer you would suffer violence in the very near future.)*

OR

(3b) You are a victim of sexual assault and the assault occurred on the premises during the 90-calendar-day period before you request a transfer. *(If you are a victim of sexual assault, then in addition to qualifying for an emergency transfer because you reasonably believe you are threatened with imminent harm from further violence if you remain in your unit, you may qualify for an emergency transfer if the sexual assault occurred on the premises of the property from which you are seeking your transfer, and that assault happened within the 90-calendar-day period before you expressly request the transfer.)*

Lee County or any other CoC or ESG funded housing provider will keep confidential requests for emergency transfers by victims of domestic violence, dating violence, sexual assault, or stalking, and the location of any move by such victims and their families.

Lee County or any other CoC or ESG funded housing provider's emergency transfer plan provides further information on emergency transfers, and Lee County or any other CoC or ESG funded housing provider must make a copy of its emergency transfer plan available to you if you ask to see it.

Documenting You Are or Have Been a Victim of Domestic Violence, Dating Violence, Sexual Assault or Stalking

Lee County or any other CoC or ESG funded housing provider can, but is not required to, ask you to provide documentation to "certify" that you are or have been a victim of domestic violence, dating violence, sexual assault, or stalking. Such request from Lee County or any other CoC or ESG funded housing provider must be in writing, and Lee County or any other CoC or ESG funded housing provider must give you at least 14 business days (Saturdays, Sundays, and Federal holidays do not count) from the day you receive the request to provide the documentation. Lee County or any other CoC or ESG funded housing provider may, but does not have to, extend the deadline for the submission of documentation upon your request.

You can provide one of the following to Lee County or any other CoC or ESG funded housing provider as documentation. It is your choice which of the following to submit if Lee County or any other CoC or ESG funded housing provider asks you to provide documentation that you are or have been a victim of domestic violence, dating violence, sexual assault, or stalking.

1. A complete HUD-approved certification form given to you by Lee County or any other CoC or ESG funded housing provider with this notice, that documents an incident of domestic violence, dating violence, sexual assault, or stalking. The form will ask for your name, the date, time, and location of the incident of domestic violence, dating violence, sexual assault, or stalking, and a description of the incident. The certification form provides for including the name of the abuser or perpetrator if the name of the abuser or perpetrator is known and is safe to provide.
2. A record of a Federal, State, tribal, territorial or local law enforcement agency, court, or administrative agency that documents the incident of domestic violence, dating violence, sexual assault, or stalking. Examples of such records include police reports, protective orders, and restraining orders, among others.
3. A statement, which you must sign, along with the signature of an employee, agent, or volunteer of a victim service provider, an attorney, a medical professional or a mental health professional (collectively, "professional") from whom you sought assistance in addressing domestic violence, dating violence, sexual assault, or stalking, or the effects of abuse, and with the professional selected by you attesting under penalty of perjury that he or she believes that the incident or incidents of domestic violence, dating violence, sexual assault, or stalking are grounds for protection.
4. Any other statement or evidence that Lee County or any other CoC or ESG funded housing provider has agreed to accept.

If you fail or refuse to provide one of these documents within the 14 business days, Lee County or any other CoC or ESG funded housing provider does not have to provide you with the protections contained in this notice.

If Lee County or any other CoC or ESG funded housing provider receives conflicting evidence that an incident of domestic violence, dating violence, sexual assault, or stalking has been committed (such as certification forms from two or more members of a household each claiming to be a victim and naming one or more of the other petitioning household members as the abuser or perpetrator), Lee County or any other CoC or ESG funded housing provider has the right to request that you provide third-party documentation within thirty (30) calendar days in order to resolve the conflict. If you fail or refuse to provide third-party documentation where there is conflicting evidence, Lee County or any other CoC or ESG funded housing provider does not have to provide you with the protections contained in this notice.

Confidentiality

Lee County or any other CoC or ESG funded housing provider must keep confidential any information you provide related to the exercise of your rights under VAWA, including the fact that you are exercising your rights under VAWA.

Lee County or any other CoC or ESG funded housing provider must not allow any individual administering assistance or other services on behalf of Lee County or any other CoC or ESG funded housing provider (for example, employees and contractors) to have access to confidential information unless for reasons that specifically call for these individuals to have access to this information under applicable Federal, State, or local law.

Lee County or any other CoC or ESG funded housing provider must not enter your information into any shared database or disclose your information to any other entity or individual. Lee County or any other CoC or ESG funded housing provider, however, may disclose the information provided if:

APPENDIX A

1. You give written permission to Lee County or any other CoC or ESG funded housing provider to release the information on a time limited basis.
2. Lee County or any other CoC or ESG funded housing provider needs to use the information in an eviction or termination proceeding, such as to evict your abuser or perpetrator or terminate your abuser or perpetrator from assistance under this program.
3. A law requires Lee County or any other CoC or ESG funded housing provider or your landlord to release the information.

VAWA does not limit Lee County or any other CoC or ESG funded housing provider's duty to honor court orders about access to or control of the property. This includes orders issued to protect a victim and orders dividing property among household members in cases where a family breaks up.

Reasons a Tenant Eligible for Occupancy Rights Under VAWA May Be Evicted or Assistance May Be Terminated

You can be evicted and your assistance can be terminated for serious or repeated lease violations that are not related to domestic violence, dating violence, sexual assault, or stalking committed against you. However, Lee County or any other CoC or ESG funded housing provider cannot hold tenants who have been victims of domestic violence, dating violence, sexual assault, or stalking to a more demanding set of rules than it applies to tenants who have not been victims of domestic violence, dating violence, sexual assault, or stalking.

The protections described in this notice might not apply, and you could be evicted and your assistance terminated, if Lee County or any other CoC or ESG funded housing provider can demonstrate that not evicting you or terminating your assistance would present a real physical danger that:

1. Would occur within an immediate time frame, and
2. Could result in death or serious bodily harm to other tenants or those who work on the property.

If Lee County or any other CoC or ESG funded housing provider can demonstrate the above, Lee County or any other CoC or ESG funded housing provider should only terminate your assistance or evict you if there are no other actions that could be taken to reduce or eliminate the threat.

Other Laws

VAWA does not replace any Federal, State, or local law that provides greater protection for victims of domestic violence, dating violence, sexual assault, or stalking. You may be entitled to additional housing protections for victims of domestic violence, dating violence, sexual assault, or stalking under other Federal laws, as well as under State and local laws.

Non-Compliance With The Requirements of This Notice

You may report a covered housing provider's violations of these rights and seek additional assistance, if needed, by contacting or filing a complaint with HUD Miami Field Office, Brickell Plaza Federal Building, 909 SE First Ave, Room 500, Miami, FL 33131-3028, Phone: 350-536-5678, Fax: 350-536-5765.

Additional Information

You may view a copy of HUD's final VAWA rule at:

<https://www.federalregister.gov/documents/2016/11/16/2016-25888/violence-against-women-reauthorization-act-of-2013-implementation-in-hud-housing-programs>.

Additionally, Lee County or any other CoC or ESG funded housing provider must make a copy of HUD's VAWA regulations available to you upon request. For questions regarding VAWA or to request a copy of the regulation, please contact Jeannie Sutton, Grants Coordinator, Lee County Human and Veteran Services, 2440 Thompson St., Fort Myers, FL 33901, Phone: 239-533-7958, Fax: 239-533-7960, E-mail: jsutton@leegov.com.

For help regarding an abusive relationship, you may call the National Domestic Violence Hotline at 1-800-799-7233 or, for persons with hearing impairments, 1-800-787-3224 (TTY). For tenants who are or have been victims of stalking seeking help may visit the National Center for Victims of Crime's Stalking Resource Center at <https://www.victimsofcrime.org/our-programs/stalking-resource-center>.

For help regarding an abusive relationship, sexual assault or stalking, you may also contact Abuse Counseling & Treatment's 24-Hour Hotline at 239-939-3112.

APPENDIX B

Certification of Domestic Violence, Dating Violence, Sexual Assault, or Stalking

Purpose of Form: The Violence Against Women Reauthorization Act of 2013 (“VAWA”) protects qualified tenants, participants, and applicants, and affiliated individuals, who are victims of domestic violence, dating violence, sexual assault, or stalking from being denied housing assistance, evicted, or terminated from housing assistance based on acts of such violence against them.

Use of Form: This is an optional form. A Public Housing Authority (PHA), owner or manager presented with a claim for continued or initial tenancy or assistance based on status as a victim of domestic violence, dating violence, sexual assault, or stalking (herein referred to as “Victim”) has the option to request that the victim document or provide written evidence to demonstrate that the violence occurred. The

Victim has the option of either submitting this form or submitting third-party documentation, such as:

- (1) A record of a Federal, State, tribal, territorial, or local law enforcement agency (e.g. police), court, or administrative agency; or
- (2) Documentation signed by the Victim and signed by an employee, agent or volunteer of a victim service provider, an attorney, a medical professional, or a mental health professional from whom the Victim has sought assistance relating to domestic violence, dating violence, sexual assault, or stalking, or the effects of abuse, in which the professional attests under penalty of perjury (28 U.S.C. 1746) that he or she believes that the incident of domestic violence, dating violence, sexual assault, or stalking is grounds for protection under 24 Code of Federal Regulations (CFR) § 5.2005 or 24 CFR § 5.2009.

If this form is used by the Victim, the Victim must complete and submit it within 14 business days of receiving it from the PHA, owner or manager. This form must be returned to the person and address specified in the written request for the certification. If the Victim does not complete and return this form (or provide third-party verification) by the 14th business day or by an extension of the date provided by the PHA, manager or owner, the Victim cannot be assured s/he will receive VAWA protections.

If the Victim submits this form or third-party documentation as listed above, the PHA, owner or manager cannot require any additional evidence from the Victim.

Confidentiality: All information provided to a PHA, owner or manager concerning the incident(s) of domestic violence, dating violence, sexual assault, or stalking relating to the Victim (including the fact that an individual is a victim of domestic violence, dating violence, sexual assault, or stalking) shall be kept confidential by the PHA, owner or manager, and such information shall not be entered into any shared database. Employees of the PHA, owner, or manager are not to have access to these details unless to afford or reject VAWA protections to the Victim; and may not disclose this information to any other entity or individual, except to the extent that disclosure is: (i) requested or consented to by the Victim in writing; (ii) required for use in an eviction proceeding; or (iii) otherwise required by applicable law.

APPENDIX B

**TO BE COMPLETED BY THE VICTIM OF DOMESTIC VIOLENCE,
DATING VIOLENCE, SEXUAL ASSAULT, OR STALKING:**

Date Written Request Received by Victim: _____

Name of Victim: _____

Names of Other Family Members Listed on the Lease: _____

Name of the Perpetrator*: _____

***Note:** The Victim is required to provide the name of the perpetrator only if the name of the perpetrator is safe to provide, and is known to the victim.

Perpetrator's Relationship to Victim: _____

Date(s), time(s), and location(s) of the incident(s) of Domestic Violence, Dating Violence, Sexual Assault, or Stalking Occurred: _____

Description of Incident(s) (This description may be used by the PHA, owner or manager for purposes of evicting the perpetrator. Please be as descriptive as possible.):

I hereby certify that the information that I have provided is true and correct and I believe that, based on the information I have provided, that I am a victim of domestic violence, dating violence, sexual assault or stalking. I acknowledge that submission of false information is a basis for denial of admission, termination of assistance, or eviction.

Signature _____ Executed on (Date) _____

Information provided is to be used by PHAs and Section 8 owners or managers to request a tenant to certify that the individual is a victim of domestic violence, dating violence or stalking. The information is subject to the confidentiality requirements of the HUD Reform Legislation.

This agency may not collect this information, and you are not required to complete this form.

APPENDIX C

Emergency Transfer Request for Certain Victims of Domestic Violence, Dating Violence, Sexual Assault, or Stalking

Purpose of Form: If you are a victim of domestic violence, dating violence, sexual assault, or stalking, and you are seeking an emergency transfer, you may use this form to request an emergency transfer and certify that you meet the requirements of eligibility for an emergency transfer under the Violence Against Women Act (VAWA). Although the statutory name references women, VAWA rights and protections apply to all victims of domestic violence, dating violence, sexual assault or stalking. Using this form does not necessarily mean that you will receive an emergency transfer. See your housing provider's emergency transfer plan for more information about the availability of emergency transfers.

The requirements you must meet are:

(1) You are a victim of domestic violence, dating violence, sexual assault, or stalking. If your housing provider does not already have documentation that you are a victim of domestic violence, dating violence, sexual assault, or stalking, your housing provider may ask you for such documentation. In response, you may submit Appendix B – Certification of Domestic Violence, Dating Violence, Sexual Assault, or Stalking (Form HUD50066), or any one of the other types of documentation listed on that Form.

(2) You expressly request the emergency transfer. Submission of this form confirms that you have expressly requested a transfer. Your housing provider may choose to require that you submit this form, or may accept another written or oral request. Please see your housing provider's emergency transfer plan for more details.

(3) You reasonably believe you are threatened with imminent harm from further violence if you remain in your current unit. This means you have a reason to fear that if you do not receive a transfer you would suffer violence in the very near future. **OR**

You are a victim of sexual assault and the assault occurred on the premises during the 90-calendar-day period before you request a transfer. If you are a victim of sexual assault, then in addition to qualifying for an emergency transfer because you reasonably believe you are threatened with imminent harm from further violence if you remain in your unit, you may qualify for an emergency transfer if the sexual assault occurred on the premises of the property from which you are seeking your transfer, and that assault happened within the 90-calendar-day period before you submit this form or otherwise expressly request the transfer.

Submission of Documentation: If you have third-party documentation that demonstrates why you are eligible for an emergency transfer, you should submit that documentation to your housing provider if it is safe for you to do so. Examples of third party documentation include, but are not limited to: a letter or other documentation from a victim service provider, social worker, legal assistance provider, pastoral counselor, mental health provider, or other professional from whom you have sought assistance; a current restraining order; a recent court order or other court records; a law enforcement report or records; communication records from the perpetrator of the violence or family members or friends of the perpetrator of the violence, including emails, voicemails, text messages, and social media posts.

Confidentiality: All information provided to your housing provider concerning the incident(s) of domestic violence, dating violence, sexual assault, or stalking, and concerning your request for an emergency transfer shall be kept confidential. Such details shall not be entered into any shared database. Employees of your housing provider are not to have access to these details unless to grant or deny VAWA protections or an emergency transfer to you. Such employees may not disclose this information to any other entity or individual, except to the extent that disclosure is: (i) consented to by you in writing in a time-limited release; (ii) required for use in an eviction proceeding or hearing regarding termination of assistance; or (iii) otherwise required by applicable law.

TO BE COMPLETED BY OR ON BEHALF OF THE PERSON REQUESTING A TRANSFER

1. Name of victim requesting and emergency transfer: _____
2. Your name (if different from victim's): _____
3. Name(s) of other family member(s) listed on the lease: _____

4. Name(s) of other family member(s) who would transfer with the victim: _____

5. Address of location from which the victim seeks to transfer: _____

6. Victim's phone number: _____
7. Name of the accused perpetrator (if known and can be safely disclosed):

8. Relationship of the accused perpetrator to the victim: _____
9. Date(s), time(s), and location(s) of the incident(s): _____

10. Is the person requesting the transfer a victim of a sexual assault that occurred in the past 90 days on the premises of the property from which the victim is seeking transfer? NO YES *If yes, skip question 11.*
11. Describe why the victim believes they are threatened with imminent harm from further violence if they remain in their current unit. _____

12. If voluntarily provided, list any third-party documentation you are providing along with this notice:

This is to certify that the information provided on this form is true and correct to the best of my knowledge, and that the individual named above in Item 1 meets the requirement laid out on this form for an emergency transfer. I acknowledge that submission of false information could jeopardize program eligibility and could be the basis for denial of admission, termination or assistance, or eviction.

Signature: _____ Date: _____

**2019-2023 Analysis of Impediments to Fair Housing Choice
City of Cape Coral, Florida**

This certifies that the City of Cape Coral has completed its Analysis of Impediments to Fair Housing Choice as certified in its Consolidated Plan. The AI was adopted by the City Council on _____.

This fulfills the U.S. Department of Housing and Urban Development (HUD) requirement as set forth in 24 CFR Part 91, et. Al. Consolidated Submission for Community Planning and Development Programs: Final Rule.

CITY OF CAPE CORAL

By: _____
Signature of Authorized Officer

Printed Name

Title

Date

APPROVED AS TO FORM:

By: _____
City Attorney's Office

Printed Name

Title

Date

ATTEST: CITY CLERK

By: _____

Printed Name

Title

Date

PLEASE RETURN 5 COPIES, EACH WITH ORIGINAL SIGNATURES

**2019-2023 Analysis of Impediments to Fair Housing Choice
City of Fort Myers, Florida**

This certifies that the City of Fort Myers has completed its Analysis of Impediments to Fair Housing Choice as certified in its Consolidated Plan. The AI was adopted by the City Council on _____.

This fulfills the U.S. Department of Housing and Urban Development (HUD) requirement as set forth in 24 CFR Part 91, et. Al. Consolidated Submission for Community Planning and Development Programs: Final Rule.

CITY OF FORT MYERS

By: _____
Signature of Authorized Officer

Printed Name

Title

Date

APPROVED AS TO FORM:

By: _____
City Attorney's Office

Printed Name

Title

Date

ATTEST: CITY CLERK

By: _____

Printed Name

Title

Date

PLEASE RETURN 5 COPIES, EACH WITH ORIGINAL SIGNATURES

**2019-2023 Analysis of Impediments to Fair Housing Choice
Lee County, Florida**

This certifies that Lee County has completed its Analysis of Impediments to Fair Housing Choice as certified in its Consolidated Plan. The AI was adopted by the Board of County Commissioners on _____.

This fulfills the U.S. Department of Housing and Urban Development (HUD) requirement as set forth in 24 CFR Part 91, et. Al. Consolidated Submission for Community Planning and Development Programs: Final Rule.

LEE COUNTY:

By: _____
Signature of Authorized Officer

Printed Name

Title

Date

APPROVED AS TO FORM:

By: _____
County Attorney's Office

Printed Name

Title

Date

ATTEST: CLERK

By: _____

Printed Name

Title

Date

PLEASE RETURN 5 COPIES, EACH WITH ORIGINAL SIGNATURES

APPENDIX A: COMMUNITY SURVEY RESULTS

- **Community Survey Results**
- **Fair Housing Specific Results**

APPENDIX B: CITIZEN PARTICIPATION

- **Public Notices**
- **Affidavit of Publications**
- **Public Comments on the Draft AI**

Lee County Community Greenhouse Gas Emissions Inventory for Calendar Year 2017

February 4, 2019

Prepared by:

Cloe Waterfeild

Twentyfifty, LLC.

cloe@twenty-fifty.com

Overview & Methodology

The following report on community greenhouse gas (GHG) emissions for Lee County for the year 2017. This assessment covers major GHG producing activities for the wider Lee County community but does not include a detailed analysis of government related emissions.

Data sources and methods follow past inventories allowing comparison of results and assessment of trends. In addition to the omission of the government analysis, there are several issues to note:

- This assessment did not utilize ICLEI's Clean Air and Climate Protection software to calculate emissions. The methodology used, based on ICLEI's community protocol, is detailed in this report and input data is provided. All coefficients were referenced from the latest available EPA guidelines.
- Water and wastewater related emissions were not assessed. In 2012 they accounted for a very small total proportion of total community emissions, around 0.3%.
- As with past inventories for Lee County, power generation related emissions, from FPL's Fort Myers power plant and Lee County's Waste to Energy facility are excluded from the final amount. This removes the potential for double counting emissions (for electricity produced at these facilities and consumed within the county), but also underestimates commercial sector emissions for power which is produced within, but consumed outside of the county.
- Data obtained from one of the two electricity providers (LCEC) is considered less precise in sector allocation than in past inventories. Only a 2 year summary was available and there was no differentiation between the commercial and residential sectors.

Despite these caveats, the revised and simplified methodology provides a useful snapshot of whole county energy use and GHG emissions for 2017 and shows that while overall emissions are greater than 5 years ago, on a per capita basis they have actually decreased. This is a trend Lee's managers should be proud of although there is still progress to be made in reaching established reduction targets.

1.0 Introduction

This community greenhouse gas (GHG) emissions inventory provides an estimate of emissions produced within Lee County boundaries, both by residents in their homes and by businesses and agencies as they carry out their operations. A baseline GHG inventory for calendar year 2007 provided a benchmark for energy use and GHG emissions and subsequent analyses for 2010 and 2012 allowed progress to be tracked. This report assesses status after five years without an inventory. Note that it does not include the more detailed assessment of Lee County government emissions, rather is a broader overview of emissions from the county as a whole.

2.0 Methodology, Units and Background

The current assessment mirrors previous inventories (using protocols developed by ICLEI-USA) but does not use ICLEI’s Clean Air and Climate Protection software to perform the calculations and analysis. Instead, an Excel spreadsheet calculator (see Appendix II) has been developed to calculate emissions using published coefficients from the EPA (EPA, 2018).

GHG amounts are presented as metric tons (MT) of carbon dioxide equivalent gas (CO₂e). The study environs are the geographical limits of Lee County Florida (Figure 1) located in region 2, the humid subtropical climate zone, per Department of Energy (DOE).

Note that emissions are quantified (within the commercial sector) for power-generating facilities located within the County (the Florida Power and Light Fort Myers Plant and Lee County’s Waste-to-Energy facility). However because the electricity they produce is used by homes and businesses within the County, the aggregate results exclude those emissions to avoid double counting.

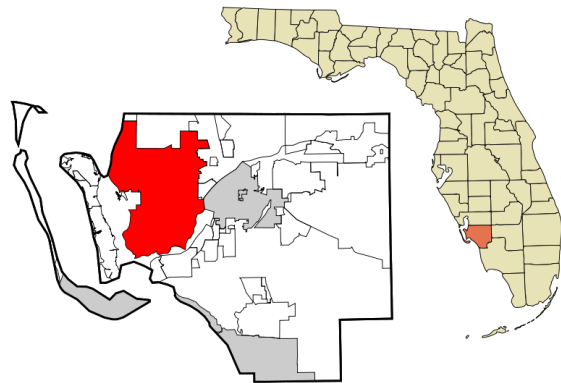


Figure 1: Lee County: Location Map

The study period is calendar year 2017. During this time Florida was affected by a major hurricane, Irma, in September.

Emissions are assessed from the following sectors: residential, commercial, transportation and waste. The final number is divided by the given population for a per capita ‘carbon footprint’ for the study year.

A summary of the main inclusions and omissions is provided in Table 1. As protocols differ in their definition of scopes (for example, some waste emissions are scope 1 for the Global Protocol, but scope 3 for ICLEI’s Community Protocol), Appendix I provides an overview of data sources and emissions are not presented by scope.

Inclusions	Omissions
Residential purchased electricity	Agriculture (livestock/forestry/land use)
Residential natural gas and propane	Transportation: marine
Commercial purchased electricity	Water and wastewater
Commercial natural gas and propane	Waste, other landfills
Transportation: roads	Refrigerants
Transportation: air	
Waste: Lee County BOCC landfill emissions	

Table 1: Key Inclusions and Omissions

3.0 Results

GHG emissions from the County as a whole for 2017 (excluding power generation facilities) were 9,409,385 metric tons CO₂e. This is an increase from 2012 of 10.1% (864,884 MT CO₂e) but is still a decrease from baseline (2007) levels of nearly 5%. Based on the 2017 population of 698,468, a per capita carbon footprint of 13.47 MT CO₂e per person is estimated, a slight increase from 2012 (13.39 MT) and considerably reduced from the 16 MT estimated in 2007.

	2007		2010		2012		2017	
	MT CO ₂ e	%	MT CO ₂ e	%	MT CO ₂ e	%	MT CO ₂ e	%
Residential	2,711,454	27.5	2,469,797	29.0	2,337,672	27.1	2,568,472	27.3
Commercial	2,508,100	25.4	1,698,890	20.0	1,812,593	21.8	1,712,806	18.2
Transportation	4,588,319	46.5	4,325,464	50.8	4,382,413	51.0	5,076,035	53.9
Waste	60,115	0.6	20,439	0.2	11,823	0.1	52,073	0.6
TOTAL	9,867,988		8,514,590		8,544,501		9,409,385	
Population	615,741		618,754		638,029		698,468	
Per capita emissions	16.03		13.76		13.39		13.47	

Table 2: Lee County GHG emissions by year, proportion and sector

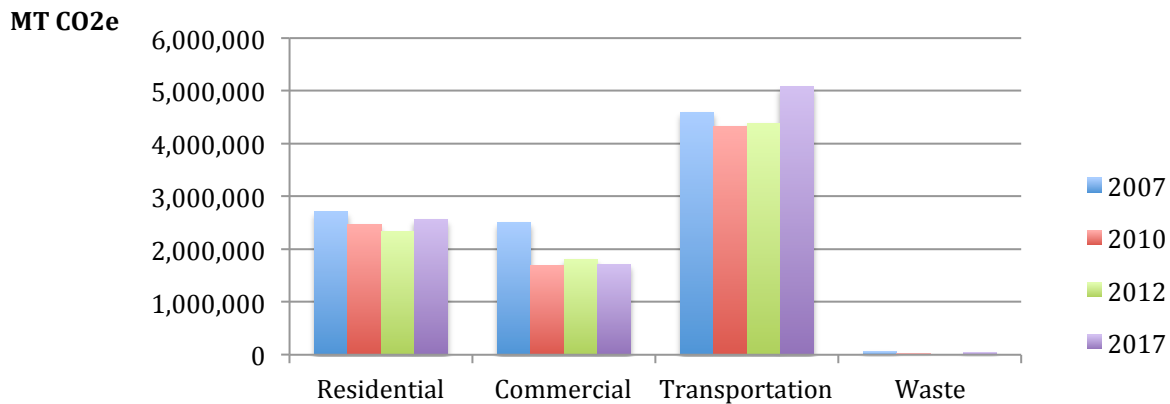


Figure 2: Lee County community GHG emissions by year and sector

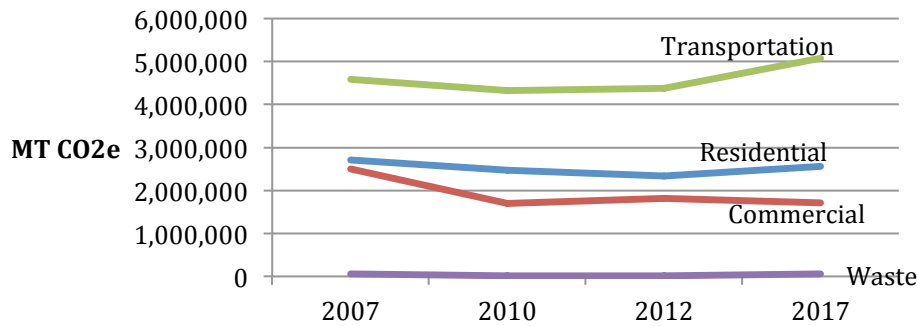


Figure 3: Lee County community GHG emission sector trends by year

	AVMT	% Change	Population	% Change
2007	6,659,078,250		615,741	
2010	6,416,436,470	-3.64%	618,754	0.50%
2012	6,442,508,785	0.40%	638,029	3.10%
2017	7,678,027,580	19.20%	698,468	9.47%

Table 3: Lee County Annual Vehicle Miles Traveled and Population Change, by year

4.0 Discussion and Recommendations

In contrast to interim inventory years, 2010 and 2012, which showed significant reductions in emissions in all sectors, the 2017 assessment shows an uptick in emissions.

The increase has not been evenly distributed between sectors, with the transportation sector showing a nearly 20% rise in vehicle miles traveled compared to an overall population increase of 10%. While the effects of Hurricane Irma and widespread evacuation from south Florida would have increased highway miles driven on Lee County roads, inflating the results, a check of VMT data for 2016 still shows a 14% increase in daily vehicle miles traveled over 2007 numbers. The increase is not solely related to the storm. A focus on reducing vehicle miles traveled on Lee County roads is a recommendation.

The commercial sector has shown little change in emissions in the past three inventory years but the residential sector shows an increase so a focus on improving efficiencies in home energy use is an additional recommendation.

Based on this assessment Lee County is not on track to reach its established reduction targets. For 2017 the goal was 15% below 2007 levels, these results show that emissions are 5% below baseline. Renewed efforts to reduce GHG emissions are timely and important.

RESIDENTIAL

This sector covers fuel and electricity used in Lee County homes. For past inventories both electric utilities, Florida Power and Light and Lee County Electric Cooperative, have provided total kWh for accounts categorized as residential or commercial. For this study year only FPL was able to do that. LCEC provided *total* kWh sold in Lee County for 2017 and we used comparative proportions from previous study years to estimate those used in the residential versus commercial sectors (27% commercial versus 73% residential). Natural gas was provided by TECO and propane was back calculated from Florida Department of Revenue taxable sales for the year. No upstream or trans-boundary (consumption based) emissions were analyzed. No data on refrigerants was collected.

COMMERCIAL

As above, electric and gas utilities provided data on total quantities sold in the county for the calendar year. A proportion (30%) of taxable sales of propane was attributed to the commercial sector and to that was added known government sales (as these are non taxable). This approach does not capture other non-profit propane use. In addition to electricity, gas and propane, there are a handful of commercial facilities in the county that burn reportable quantities of fuel. That includes both power generating facilities. Data on stationary consumption was provided by the Florida Department of Environmental Protection. As noted, fuel (natural gas, propane, solid waste and diesel) used by the FPL and WTE power plants was not included in the total Lee County GHG estimate. No data on refrigerants was collected.

TRANSPORTATION

Mirroring the approach used in past studies, we used vehicle miles traveled (VMT) to estimate GHG emissions from this sector. The Florida Department of Transportation provides daily vehicle miles traveled for all public roads in every Florida county. This daily total is converted to annual number and to estimate emissions we used an average coefficient derived from past GHG inventories, which themselves used ICLEI's Clean Air and Climate Protection software (emissions are estimated based on average size class and vehicle efficiency). This is a *very* general approach as there are a vast number of vehicles of varying fuel efficiencies traveling on Lee County roads. Additionally, using VMT adds emissions from vehicles only traveling through the county on public roads. Fuel sold at county airports was provided by the Port Authority. Marine transport was not included, as per previous studies, as there is no accurate and efficient way to obtain marine fuel data.

WASTE

To be consistent with previous inventories, the only waste related source attributed to the community inventory was methane from County managed landfills, (LandGem reports provided by County staff). Understanding emissions from the waste sector in Lee County is complicated by the waste to energy incineration facility, location of County run landfills outside of the county boundary and the presence of other smaller landfill facilities which are not assessed. It is however a small overall contributor to community emissions at or below 1% of the total.

COMMUNITY INVENTORY, CY 2017	Amount Used				Coefficient and Units	Greenhouse Gas Emissions			
	Residential	Commercial	Transportation	Waste		Residential	Commercial	Transportation	Waste
Electricity <i>FPL plus LCEC community data, in kWh</i>	5,460,659,030	3,421,835,497			1.029 lbs CO2e.kWh	5,619,018,142	3,521,068,726		
Natural Gas <i>TECO, in therms. Add government usage to the commercial number.</i>	1,646,522	18,071,481			10.636033 lbs CO2e/therm	17,512,459	192,208,868		
Propane <i>Gallons estimated from taxable sales plus Amerigas receipts from Lee County.</i>	2,099,524	5,027,148			12.37155582 lbs CO2e/gallon	25,974,379	62,193,639		
Distillate Oil (diesel) <i>Stationary combustion data from DEP, gallons.</i>		26,676			23.06704576 lbs CO2e/gallon		615,337		
Residual Oil (fuel oil) <i>Stationary combustion data from DEP, gallons.</i>					23.75743707 lbs CO2e/gallon				
Waste Gas (landfill or biogas) <i>Stationary combustion data from DEP, cubic feet.</i>					0.3831 lbs CO2e/cuft				
Transportation - Roads <i>Total Annual Vehicle Miles Traveled from DOT monitoring</i>			7,678,027,580		1.2692 lbs CO2e/mile			9,744,768,332	
Transportation - Air, Jet fuel <i>Fuel sales data from Lee County airports, gallons</i>			66,683,612		21.5702005 lbs CO2e/gallon			1,438,378,881	
Transportation - Air, Av Gas <i>Fuel sales data from Lee County airports, gallons</i>			412,279		18.38622215 lbs CO2e/gallon			7,580,253	
Solid Waste - landfill methane emissions <i>LandGem Report, Solid Waste Division, tonnes (Mg/yr)</i>				2,083	25 GWP CH4				52,073
TOTAL LEE COUNTY EMISSIONS, EXCLUDING POWER GENERATION, lbs CO2e						5,662,504,980.3	3,776,086,569.8	11,190,727,465.8	114,799,033.5
MT CO2e						2,568,472.1	1,712,806.1	5,076,034.6	52,072.5
Percentage						27%	18%	54%	1%
Population						698,468			
GRAND TOTAL 2017						9,409,385.3 MT CO2e			
Per capita, 2017						13.5 MT CO2e			

fields in orange indicate updated coefficients

POWER GENERATION EMISSIONS	Amount Used	Coefficient and Units	Greenhouse Gas Emissions
Natural Gas, FPL <i>Stationary combustion data from DEP, million cubic feet.</i>	62,068.40	242486.1538 lbs CO2e/million cu. Ft.	15,050,728,558.5
Distillate Oil (diesel), FPL <i>Stationary combustion data from DEP, gallons.</i>	2,037,715.00	23.06704576 lbs CO2e/gallon	47,004,065.2
Fossil Portion of Municipal Solid Waste, WTE <i>Stationary combustion data from DEP/Solid Waste Division, US tons.</i>	212,555.35	2033.686993 lbs CO2e/US ton	432,271,050.6
Propane, WTE <i>Stationary combustion data from DEP, gallons.</i>	244,866.00	12.37155582 lbs CO2e/gallon	3,029,373.4
TOTAL POWER GENERATING EMISSIONS, lbs CO2e			15,533,033,047.6
MT CO2e			7,045,673.7
TOTAL LEE COUNTY EMISSIONS, INCLUDING POWER GENERATION, MT CO2e			16,455,059.0

Report

Cloe Waterfield, Twentyfifty, cloe@twenty-fifty.com 239-248-7101

Data Sources

Chris Philbrick, Florida Power and Light Senior Customer Advisor 239-434-1255, C.J.Philbrick@fpl.com
Gabriela McSheehy, Lee County Electric Cooperative, Key Account Associate, 239-656-2206
gabriela.mcsheehy@lcec.net

Lance Horton, TECO, SeaCoast/ Peoples Gas, Sr. Manager Projects, lehorton@tecoenergy.com
813-228-4561

Dianne Spingler, Emissions Inventory, Compliance & Enforcement Data, Division of Air Resource Management, Florida Department of Environmental Protection, Dianne.Spingler@dep.state.fl.us, 850-717-9100

Propane: http://dor.myflorida.com/dor/taxes/colls_from_7_2003.html

Traffic data at <http://www.dot.state.fl.us/planning/statistics/mileage-rpts/public.shtm>

Bruce Westberry: Lee County, Senior Fiscal Officer, 239-533-8528 bwestberry@leegov.com

Michael LeBlanc, Environmental Specialist, Lee County Port Authority 239-590-4624,
mwleblanc@flylcpa.com

Laura Gray, Public Utilities Engineer, Lee County Solid Waste Division, 239-533-8000,

LGray@leegov.com

Steve Myers, LeeTran, 239-533-211, smyers@leegov.com

Protocols

[Global Protocol for Community Scale Greenhouse Gas Emissions Inventories](#), World Resources Institute, 2014

[US Community Protocol for Accounting and Reporting of Greenhouse Gas Emissions](#), ICLEI, 2013

Coefficients

[Emission Factors for Greenhouse Gas Inventories](#), EPA, 2018

Sincere thanks to all for providing time and data without which this assessment could not be carried out.

Special appreciation to Rosemarie Fusco, EnSite, and Tessa LeSage at the Southwest Florida Community Foundation.

Grantee SF-424's and Certifications

HUD SF-424 for Emergency Solutions Grant

HUD SF-424D for Emergency Solutions Grant

HUD SF-424 for HOME Investment Partnerships

HUD SF-424D for HOME Investment Partnerships

HUD SF-424 for Community Development Block Grant

HUD SF-424D for Community Development Block Grant

HUD Non-State Certifications

Application for Federal Assistance SF-424

* 1. Type of Submission: <input type="checkbox"/> Preapplication <input checked="" type="checkbox"/> Application <input type="checkbox"/> Changed/Corrected Application	* 2. Type of Application: <input type="checkbox"/> New <input checked="" type="checkbox"/> Continuation <input type="checkbox"/> Revision	* If Revision, select appropriate letter(s): <input type="text"/> * Other (Specify): <input type="text"/>
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* 3. Date Received: <input type="text" value="10/01/2019"/>	4. Applicant Identifier: <input type="text"/>
--	--

5a. Federal Entity Identifier: <input type="text" value="E-19-UC-12-0013"/>	5b. Federal Award Identifier: <input type="text" value="120971"/>
--	--

State Use Only:

6. Date Received by State: <input type="text"/>	7. State Application Identifier: <input type="text"/>
---	---

8. APPLICANT INFORMATION:

* a. Legal Name:

* b. Employer/Taxpayer Identification Number (EIN/TIN): <input type="text" value="59-6000702"/>	* c. Organizational DUNS: <input type="text" value="0134616110000"/>
--	---

d. Address:

* Street1:
Street2:
* City:
County/Parish:
* State:
Province:
* Country:
* Zip / Postal Code:

e. Organizational Unit:

Department Name: <input type="text" value="Human and Veteran Services"/>	Division Name: <input type="text"/>
---	--

f. Name and contact information of person to be contacted on matters involving this application:

Prefix: * First Name:
Middle Name:
* Last Name:
Suffix:

Title:

Organizational Affiliation:

* Telephone Number: Fax Number:

* Email:

Application for Federal Assistance SF-424

*** 9. Type of Applicant 1: Select Applicant Type:**

B: County Government

Type of Applicant 2: Select Applicant Type:

Type of Applicant 3: Select Applicant Type:

* Other (specify):

*** 10. Name of Federal Agency:**

U.S. Department of Housing and Urban Development

11. Catalog of Federal Domestic Assistance Number:

14.231

CFDA Title:

*** 12. Funding Opportunity Number:**

N/A

* Title:

This is not a federal competition, but rather the renewal of entitlement funding to an urban county.

13. Competition Identification Number:

Title:

14. Areas Affected by Project (Cities, Counties, States, etc.):

Add Attachment

Delete Attachment

View Attachment

*** 15. Descriptive Title of Applicant's Project:**

Lee County 2019 Annual Action Plan.

Attach supporting documents as specified in agency instructions.

Add Attachments

Delete Attachments

View Attachments

Application for Federal Assistance SF-424

16. Congressional Districts Of:

* a. Applicant

* b. Program/Project

Attach an additional list of Program/Project Congressional Districts if needed.

Add Attachment

Delete Attachment

View Attachment

17. Proposed Project:

* a. Start Date:

* b. End Date:

18. Estimated Funding (\$):

* a. Federal	<input type="text" value="255,297.00"/>
* b. Applicant	<input type="text" value="0.00"/>
* c. State	<input type="text" value="0.00"/>
* d. Local	<input type="text" value="0.00"/>
* e. Other	<input type="text" value="0.00"/>
* f. Program Income	<input type="text" value="0.00"/>
* g. TOTAL	<input type="text" value="255,297.00"/>

*** 19. Is Application Subject to Review By State Under Executive Order 12372 Process?**

a. This application was made available to the State under the Executive Order 12372 Process for review on

b. Program is subject to E.O. 12372 but has not been selected by the State for review.

c. Program is not covered by E.O. 12372.

*** 20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes," provide explanation in attachment.)**

Yes No

If "Yes", provide explanation and attach

Add Attachment

Delete Attachment

View Attachment

21. *By signing this application, I certify (1) to the statements contained in the list of certifications and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances** and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 218, Section 1001)**

** I AGREE

** The list of certifications and assurances, or an internet site where you may obtain this list, is contained in the announcement or agency specific instructions.

Authorized Representative:

Prefix: * First Name:

Middle Name:

* Last Name:

Suffix:

* Title:

* Telephone Number:

Fax Number:

* Email:

* Signature of Authorized Representative:

* Date Signed:

ASSURANCES - CONSTRUCTION PROGRAMS

OMB Number: 4040-0009
Expiration Date: 02/28/2022

Public reporting burden for this collection of information is estimated to average 15 minutes per response, including time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to the Office of Management and Budget, Paperwork Reduction Project (0348-0042), Washington, DC 20503.



PLEASE DO NOT RETURN YOUR COMPLETED FORM TO THE OFFICE OF MANAGEMENT AND BUDGET. SEND IT TO THE ADDRESS PROVIDED BY THE SPONSORING AGENCY.

NOTE: Certain of these assurances may not be applicable to your project or program. If you have questions, please contact the Awarding Agency. Further, certain Federal assistance awarding agencies may require applicants to certify to additional assurances. If such is the case, you will be notified.

As the duly authorized representative of the applicant, I certify that the applicant:

1. Has the legal authority to apply for Federal assistance, and the institutional, managerial and financial capability (including funds sufficient to pay the non-Federal share of project costs) to ensure proper planning, management and completion of project described in this application.
2. Will give the awarding agency, the Comptroller General of the United States and, if appropriate, the State, the right to examine all records, books, papers, or documents related to the assistance; and will establish a proper accounting system in accordance with generally accepted accounting standards or agency directives.
3. Will not dispose of, modify the use of, or change the terms of the real property title or other interest in the site and facilities without permission and instructions from the awarding agency. Will record the Federal awarding agency directives and will include a covenant in the title of real property acquired in whole or in part with Federal assistance funds to assure non-discrimination during the useful life of the project.
4. Will comply with the requirements of the assistance awarding agency with regard to the drafting, review and approval of construction plans and specifications.
5. Will provide and maintain competent and adequate engineering supervision at the construction site to ensure that the complete work conforms with the approved plans and specifications and will furnish progressive reports and such other information as may be required by the assistance awarding agency or State.
6. Will initiate and complete the work within the applicable time frame after receipt of approval of the awarding agency.
7. Will establish safeguards to prohibit employees from using their positions for a purpose that constitutes or presents the appearance of personal or organizational conflict of interest, or personal gain.
8. Will comply with the Intergovernmental Personnel Act of 1970 (42 U.S.C. §§4728-4763) relating to prescribed standards of merit systems for programs funded under one of the 19 statutes or regulations specified in Appendix A of OPM's Standards for a Merit System of Personnel Administration (5 C.F.R. 900, Subpart F).
9. Will comply with the Lead-Based Paint Poisoning Prevention Act (42 U.S.C. §§4801 et seq.) which prohibits the use of lead-based paint in construction or rehabilitation of residence structures.
10. Will comply with all Federal statutes relating to non-discrimination. These include but are not limited to: (a) Title VI of the Civil Rights Act of 1964 (P.L. 88-352) which prohibits discrimination on the basis of race, color or national origin; (b) Title IX of the Education Amendments of 1972, as amended (20 U.S.C. §§1681 1683, and 1685-1686), which prohibits discrimination on the basis of sex; (c) Section 504 of the Rehabilitation Act of 1973, as amended (29 U.S.C. §794), which prohibits discrimination on the basis of handicaps; (d) the Age Discrimination Act of 1975, as amended (42 U.S.C. §§6101-6107), which prohibits discrimination on the basis of age; (e) the Drug Abuse Office and Treatment Act of 1972 (P.L. 92-255), as amended relating to nondiscrimination on the basis of drug abuse; (f) the Comprehensive Alcohol Abuse and Alcoholism Prevention, Treatment and Rehabilitation Act of 1970 (P.L. 91-616), as amended, relating to nondiscrimination on the basis of alcohol abuse or alcoholism; (g) §§523 and 527 of the Public Health Service Act of 1912 (42 U.S.C. §§290 dd-3 and 290 ee 3), as amended, relating to confidentiality of alcohol and drug abuse patient records; (h) Title VIII of the Civil Rights Act of 1968 (42 U.S.C. §§3601 et seq.), as amended, relating to nondiscrimination in the sale, rental or financing of housing; (i) any other nondiscrimination provisions in the specific statute(s) under which application for Federal assistance is being made; and (j) the requirements of any other nondiscrimination statute(s) which may apply to the application.

11. Will comply, or has already complied, with the requirements of Titles II and III of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (P.L. 91-646) which provide for fair and equitable treatment of persons displaced or whose property is acquired as a result of Federal and federally-assisted programs. These requirements apply to all interests in real property acquired for project purposes regardless of Federal participation in purchases.
12. Will comply with the provisions of the Hatch Act (5 U.S.C. §§1501-1508 and 7324-7328) which limit the political activities of employees whose principal employment activities are funded in whole or in part with Federal funds.
13. Will comply, as applicable, with the provisions of the Davis-Bacon Act (40 U.S.C. §§276a to 276a-7), the Copeland Act (40 U.S.C. §276c and 18 U.S.C. §874), and the Contract Work Hours and Safety Standards Act (40 U.S.C. §§327-333) regarding labor standards for federally-assisted construction subagreements.
14. Will comply with flood insurance purchase requirements of Section 102(a) of the Flood Disaster Protection Act of 1973 (P.L. 93-234) which requires recipients in a special flood hazard area to participate in the program and to purchase flood insurance if the total cost of insurable construction and acquisition is \$10,000 or more.
15. Will comply with environmental standards which may be prescribed pursuant to the following: (a) institution of environmental quality control measures under the National Environmental Policy Act of 1969 (P.L. 91-190) and Executive Order (EO) 11514; (b) notification of violating facilities pursuant to EO 11738; (c) protection of wetlands pursuant to EO 11990; (d) evaluation of flood hazards in floodplains in accordance with EO 11988; (e) assurance of project consistency with the approved State management program developed under the Coastal Zone Management Act of 1972 (16 U.S.C. §§1451 et seq.); (f) conformity of Federal actions to State (Clean Air) implementation Plans under Section 176(c) of the Clean Air Act of 1955, as amended (42 U.S.C. §§7401 et seq.); (g) protection of underground sources of drinking water under the Safe Drinking Water Act of 1974, as amended (P.L. 93-523); and, (h) protection of endangered species under the Endangered Species Act of 1973, as amended (P.L. 93-205).
16. Will comply with the Wild and Scenic Rivers Act of 1968 (16 U.S.C. §§1271 et seq.) related to protecting components or potential components of the national wild and scenic rivers system.
17. Will assist the awarding agency in assuring compliance with Section 106 of the National Historic Preservation Act of 1966, as amended (16 U.S.C. §470), EO 11593 (identification and protection of historic properties), and the Archaeological and Historic Preservation Act of 1974 (16 U.S.C. §§469a-1 et seq).
18. Will cause to be performed the required financial and compliance audits in accordance with the Single Audit Act Amendments of 1996 and OMB Circular No. A-133, "Audits of States, Local Governments, and Non-Profit Organizations."
19. Will comply with all applicable requirements of all other Federal laws, executive orders, regulations, and policies governing this program.
20. Will comply with the requirements of Section 106(g) of the Trafficking Victims Protection Act (TVPA) of 2000, as amended (22 U.S.C. 7104) which prohibits grant award recipients or a sub-recipient from (1) Engaging in severe forms of trafficking in persons during the period of time that the award is in effect (2) Procuring a commercial sex act during the period of time that the award is in effect or (3) Using forced labor in the performance of the award or subawards under the award.

SIGNATURE OF AUTHORIZED CERTIFYING OFFICIAL 	TITLE <input data-bbox="899 1373 1516 1409" type="text" value="Vice-Chair, Board of County Commissioners"/>
APPLICANT ORGANIZATION <input data-bbox="87 1518 867 1556" type="text" value="Lee County"/>	DATE SUBMITTED 

Application for Federal Assistance SF-424

* 1. Type of Submission: <input type="checkbox"/> Preapplication <input checked="" type="checkbox"/> Application <input type="checkbox"/> Changed/Corrected Application	* 2. Type of Application: <input type="checkbox"/> New <input checked="" type="checkbox"/> Continuation <input type="checkbox"/> Revision	* If Revision, select appropriate letter(s): <input type="text"/> * Other (Specify): <input type="text"/>
--	--	--

* 3. Date Received: <input type="text" value="10/01/2019"/>	4. Applicant Identifier: <input type="text"/>
--	--

5a. Federal Entity Identifier: <input type="text" value="M-19-UC-12-0210"/>	5b. Federal Award Identifier: <input type="text" value="120971"/>
--	--

State Use Only:

6. Date Received by State: <input type="text"/>	7. State Application Identifier: <input type="text"/>
---	---

8. APPLICANT INFORMATION:

* a. Legal Name:

* b. Employer/Taxpayer Identification Number (EIN/TIN): <input type="text" value="59-6000702"/>	* c. Organizational DUNS: <input type="text" value="0134616110000"/>
--	---

d. Address:

* Street1:
Street2:
* City:
County/Parish:
* State:
Province:
* Country:
* Zip / Postal Code:

e. Organizational Unit:

Department Name: <input type="text" value="Human and Veteran Services"/>	Division Name: <input type="text"/>
---	--

f. Name and contact information of person to be contacted on matters involving this application:

Prefix: * First Name:
Middle Name:
* Last Name:
Suffix:

Title:

Organizational Affiliation:

* Telephone Number: Fax Number:

* Email:

Application for Federal Assistance SF-424

*** 9. Type of Applicant 1: Select Applicant Type:**

B: County Government

Type of Applicant 2: Select Applicant Type:

Type of Applicant 3: Select Applicant Type:

* Other (specify):

*** 10. Name of Federal Agency:**

U.S. Department of Housing and Urban Development

11. Catalog of Federal Domestic Assistance Number:

14.239

CFDA Title:

*** 12. Funding Opportunity Number:**

N/A

* Title:

This is not a federal competition, but rather the renewal of entitlement funding to an urban county.

13. Competition Identification Number:

Title:

14. Areas Affected by Project (Cities, Counties, States, etc.):

Add Attachment

Delete Attachment

View Attachment

*** 15. Descriptive Title of Applicant's Project:**

Lee County 2019 Annual Action Plan.

Attach supporting documents as specified in agency instructions.

Add Attachments

Delete Attachments

View Attachments

Application for Federal Assistance SF-424

16. Congressional Districts Of:

* a. Applicant

* b. Program/Project

Attach an additional list of Program/Project Congressional Districts if needed.

Add Attachment

Delete Attachment

View Attachment

17. Proposed Project:

* a. Start Date:

* b. End Date:

18. Estimated Funding (\$):

* a. Federal	<input type="text" value="938,598.00"/>
* b. Applicant	<input type="text" value="0.00"/>
* c. State	<input type="text" value="0.00"/>
* d. Local	<input type="text" value="0.00"/>
* e. Other	<input type="text" value="0.00"/>
* f. Program Income	<input type="text" value="70,000.00"/>
* g. TOTAL	<input type="text" value="1,008,598.00"/>

*** 19. Is Application Subject to Review By State Under Executive Order 12372 Process?**

a. This application was made available to the State under the Executive Order 12372 Process for review on

b. Program is subject to E.O. 12372 but has not been selected by the State for review.

c. Program is not covered by E.O. 12372.

*** 20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes," provide explanation in attachment.)**

Yes No

If "Yes", provide explanation and attach

Add Attachment

Delete Attachment

View Attachment

21. *By signing this application, I certify (1) to the statements contained in the list of certifications and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances** and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 218, Section 1001)**

** I AGREE

** The list of certifications and assurances, or an internet site where you may obtain this list, is contained in the announcement or agency specific instructions.

Authorized Representative:

Prefix: * First Name:

Middle Name:

* Last Name:

Suffix:

* Title:

* Telephone Number:

Fax Number:

* Email:

* Signature of Authorized Representative:

* Date Signed:

ASSURANCES - CONSTRUCTION PROGRAMS

OMB Number: 4040-0009
Expiration Date: 02/28/2022

Public reporting burden for this collection of information is estimated to average 15 minutes per response, including time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to the Office of Management and Budget, Paperwork Reduction Project (0348-0042), Washington, DC 20503.



PLEASE DO NOT RETURN YOUR COMPLETED FORM TO THE OFFICE OF MANAGEMENT AND BUDGET. SEND IT TO THE ADDRESS PROVIDED BY THE SPONSORING AGENCY.

NOTE: Certain of these assurances may not be applicable to your project or program. If you have questions, please contact the Awarding Agency. Further, certain Federal assistance awarding agencies may require applicants to certify to additional assurances. If such is the case, you will be notified.

As the duly authorized representative of the applicant, I certify that the applicant:

1. Has the legal authority to apply for Federal assistance, and the institutional, managerial and financial capability (including funds sufficient to pay the non-Federal share of project costs) to ensure proper planning, management and completion of project described in this application.
2. Will give the awarding agency, the Comptroller General of the United States and, if appropriate, the State, the right to examine all records, books, papers, or documents related to the assistance; and will establish a proper accounting system in accordance with generally accepted accounting standards or agency directives.
3. Will not dispose of, modify the use of, or change the terms of the real property title or other interest in the site and facilities without permission and instructions from the awarding agency. Will record the Federal awarding agency directives and will include a covenant in the title of real property acquired in whole or in part with Federal assistance funds to assure non-discrimination during the useful life of the project.
4. Will comply with the requirements of the assistance awarding agency with regard to the drafting, review and approval of construction plans and specifications.
5. Will provide and maintain competent and adequate engineering supervision at the construction site to ensure that the complete work conforms with the approved plans and specifications and will furnish progressive reports and such other information as may be required by the assistance awarding agency or State.
6. Will initiate and complete the work within the applicable time frame after receipt of approval of the awarding agency.
7. Will establish safeguards to prohibit employees from using their positions for a purpose that constitutes or presents the appearance of personal or organizational conflict of interest, or personal gain.
8. Will comply with the Intergovernmental Personnel Act of 1970 (42 U.S.C. §§4728-4763) relating to prescribed standards of merit systems for programs funded under one of the 19 statutes or regulations specified in Appendix A of OPM's Standards for a Merit System of Personnel Administration (5 C.F.R. 900, Subpart F).
9. Will comply with the Lead-Based Paint Poisoning Prevention Act (42 U.S.C. §§4801 et seq.) which prohibits the use of lead-based paint in construction or rehabilitation of residence structures.
10. Will comply with all Federal statutes relating to non-discrimination. These include but are not limited to: (a) Title VI of the Civil Rights Act of 1964 (P.L. 88-352) which prohibits discrimination on the basis of race, color or national origin; (b) Title IX of the Education Amendments of 1972, as amended (20 U.S.C. §§1681 1683, and 1685-1686), which prohibits discrimination on the basis of sex; (c) Section 504 of the Rehabilitation Act of 1973, as amended (29 U.S.C. §794), which prohibits discrimination on the basis of handicaps; (d) the Age Discrimination Act of 1975, as amended (42 U.S.C. §§6101-6107), which prohibits discrimination on the basis of age; (e) the Drug Abuse Office and Treatment Act of 1972 (P.L. 92-255), as amended relating to nondiscrimination on the basis of drug abuse; (f) the Comprehensive Alcohol Abuse and Alcoholism Prevention, Treatment and Rehabilitation Act of 1970 (P.L. 91-616), as amended, relating to nondiscrimination on the basis of alcohol abuse or alcoholism; (g) §§523 and 527 of the Public Health Service Act of 1912 (42 U.S.C. §§290 dd-3 and 290 ee 3), as amended, relating to confidentiality of alcohol and drug abuse patient records; (h) Title VIII of the Civil Rights Act of 1968 (42 U.S.C. §§3601 et seq.), as amended, relating to nondiscrimination in the sale, rental or financing of housing; (i) any other nondiscrimination provisions in the specific statute(s) under which application for Federal assistance is being made; and (j) the requirements of any other nondiscrimination statute(s) which may apply to the application.

11. Will comply, or has already complied, with the requirements of Titles II and III of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (P.L. 91-646) which provide for fair and equitable treatment of persons displaced or whose property is acquired as a result of Federal and federally-assisted programs. These requirements apply to all interests in real property acquired for project purposes regardless of Federal participation in purchases.
12. Will comply with the provisions of the Hatch Act (5 U.S.C. §§1501-1508 and 7324-7328) which limit the political activities of employees whose principal employment activities are funded in whole or in part with Federal funds.
13. Will comply, as applicable, with the provisions of the Davis-Bacon Act (40 U.S.C. §§276a to 276a-7), the Copeland Act (40 U.S.C. §276c and 18 U.S.C. §874), and the Contract Work Hours and Safety Standards Act (40 U.S.C. §§327-333) regarding labor standards for federally-assisted construction subagreements.
14. Will comply with flood insurance purchase requirements of Section 102(a) of the Flood Disaster Protection Act of 1973 (P.L. 93-234) which requires recipients in a special flood hazard area to participate in the program and to purchase flood insurance if the total cost of insurable construction and acquisition is \$10,000 or more.
15. Will comply with environmental standards which may be prescribed pursuant to the following: (a) institution of environmental quality control measures under the National Environmental Policy Act of 1969 (P.L. 91-190) and Executive Order (EO) 11514; (b) notification of violating facilities pursuant to EO 11738; (c) protection of wetlands pursuant to EO 11990; (d) evaluation of flood hazards in floodplains in accordance with EO 11988; (e) assurance of project consistency with the approved State management program developed under the Coastal Zone Management Act of 1972 (16 U.S.C. §§1451 et seq.); (f) conformity of Federal actions to State (Clean Air) implementation Plans under Section 176(c) of the Clean Air Act of 1955, as amended (42 U.S.C. §§7401 et seq.); (g) protection of underground sources of drinking water under the Safe Drinking Water Act of 1974, as amended (P.L. 93-523); and, (h) protection of endangered species under the Endangered Species Act of 1973, as amended (P.L. 93-205).
16. Will comply with the Wild and Scenic Rivers Act of 1968 (16 U.S.C. §§1271 et seq.) related to protecting components or potential components of the national wild and scenic rivers system.
17. Will assist the awarding agency in assuring compliance with Section 106 of the National Historic Preservation Act of 1966, as amended (16 U.S.C. §470), EO 11593 (identification and protection of historic properties), and the Archaeological and Historic Preservation Act of 1974 (16 U.S.C. §§469a-1 et seq).
18. Will cause to be performed the required financial and compliance audits in accordance with the Single Audit Act Amendments of 1996 and OMB Circular No. A-133, "Audits of States, Local Governments, and Non-Profit Organizations."
19. Will comply with all applicable requirements of all other Federal laws, executive orders, regulations, and policies governing this program.
20. Will comply with the requirements of Section 106(g) of the Trafficking Victims Protection Act (TVPA) of 2000, as amended (22 U.S.C. 7104) which prohibits grant award recipients or a sub-recipient from (1) Engaging in severe forms of trafficking in persons during the period of time that the award is in effect (2) Procuring a commercial sex act during the period of time that the award is in effect or (3) Using forced labor in the performance of the award or subawards under the award.

SIGNATURE OF AUTHORIZED CERTIFYING OFFICIAL 	TITLE <input data-bbox="899 1371 1516 1409" type="text" value="Vice-Chair, Board of County Commissioners"/>
APPLICANT ORGANIZATION <input data-bbox="87 1518 867 1556" type="text" value="Lee County"/>	DATE SUBMITTED 

Application for Federal Assistance SF-424

* 1. Type of Submission: <input type="checkbox"/> Preapplication <input checked="" type="checkbox"/> Application <input type="checkbox"/> Changed/Corrected Application	* 2. Type of Application: <input type="checkbox"/> New <input checked="" type="checkbox"/> Continuation <input type="checkbox"/> Revision	* If Revision, select appropriate letter(s): <input type="text"/> * Other (Specify): <input type="text"/>
--	--	--

* 3. Date Received: <input type="text" value="10/01/2019"/>	4. Applicant Identifier: <input type="text"/>
--	--

5a. Federal Entity Identifier: <input type="text" value="B-19-UC-12-0013"/>	5b. Federal Award Identifier: <input type="text" value="120971"/>
--	--

State Use Only:

6. Date Received by State: <input type="text"/>	7. State Application Identifier: <input type="text"/>
---	---

8. APPLICANT INFORMATION:

* a. Legal Name:

* b. Employer/Taxpayer Identification Number (EIN/TIN): <input type="text" value="59-6000702"/>	* c. Organizational DUNS: <input type="text" value="0134616110000"/>
--	---

d. Address:

* Street1:
Street2:
* City:
County/Parish:
* State:
Province:
* Country:
* Zip / Postal Code:

e. Organizational Unit:

Department Name: <input type="text" value="Human and Veteran Services"/>	Division Name: <input type="text"/>
---	--

f. Name and contact information of person to be contacted on matters involving this application:

Prefix: * First Name:
Middle Name:
* Last Name:
Suffix:

Title:

Organizational Affiliation:

* Telephone Number: <input type="text" value="239-533-7958"/>	Fax Number: <input type="text" value="239-533-7960"/>
---	---

* Email:

Application for Federal Assistance SF-424

*** 9. Type of Applicant 1: Select Applicant Type:**

B: County Government

Type of Applicant 2: Select Applicant Type:

Type of Applicant 3: Select Applicant Type:

* Other (specify):

*** 10. Name of Federal Agency:**

U.S. Department of Housing and Urban Development

11. Catalog of Federal Domestic Assistance Number:

14.218

CFDA Title:

*** 12. Funding Opportunity Number:**

N/A

* Title:

This is not a federal competition, but rather the renewal of entitlement funding to an urban county.

13. Competition Identification Number:

Title:

14. Areas Affected by Project (Cities, Counties, States, etc.):

Add Attachment

Delete Attachment

View Attachment

*** 15. Descriptive Title of Applicant's Project:**

Lee County 2019 Annual Action Plan.

Attach supporting documents as specified in agency instructions.

Add Attachments

Delete Attachments

View Attachments

Application for Federal Assistance SF-424

16. Congressional Districts Of:

* a. Applicant

* b. Program/Project

Attach an additional list of Program/Project Congressional Districts if needed.

Add Attachment

Delete Attachment

View Attachment

17. Proposed Project:

* a. Start Date:

* b. End Date:

18. Estimated Funding (\$):

* a. Federal	<input type="text" value="3,047,518.00"/>
* b. Applicant	<input type="text" value="0.00"/>
* c. State	<input type="text" value="0.00"/>
* d. Local	<input type="text" value="0.00"/>
* e. Other	<input type="text" value="0.00"/>
* f. Program Income	<input type="text" value="20,000.00"/>
* g. TOTAL	<input type="text" value="3,067,518.00"/>

*** 19. Is Application Subject to Review By State Under Executive Order 12372 Process?**

a. This application was made available to the State under the Executive Order 12372 Process for review on

b. Program is subject to E.O. 12372 but has not been selected by the State for review.

c. Program is not covered by E.O. 12372.

*** 20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes," provide explanation in attachment.)**

Yes No

If "Yes", provide explanation and attach

Add Attachment

Delete Attachment

View Attachment

21. *By signing this application, I certify (1) to the statements contained in the list of certifications and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances** and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 218, Section 1001)**

** I AGREE

** The list of certifications and assurances, or an internet site where you may obtain this list, is contained in the announcement or agency specific instructions.

Authorized Representative:

Prefix: * First Name:

Middle Name:

* Last Name:

Suffix:

* Title:

* Telephone Number:

Fax Number:

* Email:

* Signature of Authorized Representative:

* Date Signed:

ASSURANCES - CONSTRUCTION PROGRAMS

OMB Number: 4040-0009
Expiration Date: 02/28/2022

Public reporting burden for this collection of information is estimated to average 15 minutes per response, including time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to the Office of Management and Budget, Paperwork Reduction Project (0348-0042), Washington, DC 20503.



PLEASE DO NOT RETURN YOUR COMPLETED FORM TO THE OFFICE OF MANAGEMENT AND BUDGET. SEND IT TO THE ADDRESS PROVIDED BY THE SPONSORING AGENCY.

NOTE: Certain of these assurances may not be applicable to your project or program. If you have questions, please contact the Awarding Agency. Further, certain Federal assistance awarding agencies may require applicants to certify to additional assurances. If such is the case, you will be notified.

As the duly authorized representative of the applicant, I certify that the applicant:

1. Has the legal authority to apply for Federal assistance, and the institutional, managerial and financial capability (including funds sufficient to pay the non-Federal share of project costs) to ensure proper planning, management and completion of project described in this application.
2. Will give the awarding agency, the Comptroller General of the United States and, if appropriate, the State, the right to examine all records, books, papers, or documents related to the assistance; and will establish a proper accounting system in accordance with generally accepted accounting standards or agency directives.
3. Will not dispose of, modify the use of, or change the terms of the real property title or other interest in the site and facilities without permission and instructions from the awarding agency. Will record the Federal awarding agency directives and will include a covenant in the title of real property acquired in whole or in part with Federal assistance funds to assure non-discrimination during the useful life of the project.
4. Will comply with the requirements of the assistance awarding agency with regard to the drafting, review and approval of construction plans and specifications.
5. Will provide and maintain competent and adequate engineering supervision at the construction site to ensure that the complete work conforms with the approved plans and specifications and will furnish progressive reports and such other information as may be required by the assistance awarding agency or State.
6. Will initiate and complete the work within the applicable time frame after receipt of approval of the awarding agency.
7. Will establish safeguards to prohibit employees from using their positions for a purpose that constitutes or presents the appearance of personal or organizational conflict of interest, or personal gain.
8. Will comply with the Intergovernmental Personnel Act of 1970 (42 U.S.C. §§4728-4763) relating to prescribed standards of merit systems for programs funded under one of the 19 statutes or regulations specified in Appendix A of OPM's Standards for a Merit System of Personnel Administration (5 C.F.R. 900, Subpart F).
9. Will comply with the Lead-Based Paint Poisoning Prevention Act (42 U.S.C. §§4801 et seq.) which prohibits the use of lead-based paint in construction or rehabilitation of residence structures.
10. Will comply with all Federal statutes relating to non-discrimination. These include but are not limited to: (a) Title VI of the Civil Rights Act of 1964 (P.L. 88-352) which prohibits discrimination on the basis of race, color or national origin; (b) Title IX of the Education Amendments of 1972, as amended (20 U.S.C. §§1681 1683, and 1685-1686), which prohibits discrimination on the basis of sex; (c) Section 504 of the Rehabilitation Act of 1973, as amended (29 U.S.C. §794), which prohibits discrimination on the basis of handicaps; (d) the Age Discrimination Act of 1975, as amended (42 U.S.C. §§6101-6107), which prohibits discrimination on the basis of age; (e) the Drug Abuse Office and Treatment Act of 1972 (P.L. 92-255), as amended relating to nondiscrimination on the basis of drug abuse; (f) the Comprehensive Alcohol Abuse and Alcoholism Prevention, Treatment and Rehabilitation Act of 1970 (P.L. 91-616), as amended, relating to nondiscrimination on the basis of alcohol abuse or alcoholism; (g) §§523 and 527 of the Public Health Service Act of 1912 (42 U.S.C. §§290 dd-3 and 290 ee 3), as amended, relating to confidentiality of alcohol and drug abuse patient records; (h) Title VIII of the Civil Rights Act of 1968 (42 U.S.C. §§3601 et seq.), as amended, relating to nondiscrimination in the sale, rental or financing of housing; (i) any other nondiscrimination provisions in the specific statute(s) under which application for Federal assistance is being made; and (j) the requirements of any other nondiscrimination statute(s) which may apply to the application.

11. Will comply, or has already complied, with the requirements of Titles II and III of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (P.L. 91-646) which provide for fair and equitable treatment of persons displaced or whose property is acquired as a result of Federal and federally-assisted programs. These requirements apply to all interests in real property acquired for project purposes regardless of Federal participation in purchases.
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18. Will cause to be performed the required financial and compliance audits in accordance with the Single Audit Act Amendments of 1996 and OMB Circular No. A-133, "Audits of States, Local Governments, and Non-Profit Organizations."
19. Will comply with all applicable requirements of all other Federal laws, executive orders, regulations, and policies governing this program.
20. Will comply with the requirements of Section 106(g) of the Trafficking Victims Protection Act (TVPA) of 2000, as amended (22 U.S.C. 7104) which prohibits grant award recipients or a sub-recipient from (1) Engaging in severe forms of trafficking in persons during the period of time that the award is in effect (2) Procuring a commercial sex act during the period of time that the award is in effect or (3) Using forced labor in the performance of the award or subawards under the award.

SIGNATURE OF AUTHORIZED CERTIFYING OFFICIAL 	TITLE <input data-bbox="899 1373 1516 1409" type="text" value="Vice-Chair, Board of County Commissioners"/>
APPLICANT ORGANIZATION <input data-bbox="87 1518 867 1556" type="text" value="Lee County"/>	DATE SUBMITTED 

CERTIFICATIONS

In accordance with the applicable statutes and the regulations governing the consolidated plan regulations, the jurisdiction certifies that:

Affirmatively Further Fair Housing --The jurisdiction will affirmatively further fair housing.

Uniform Relocation Act and Anti-displacement and Relocation Plan -- It will comply with the acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended, (42 U.S.C. 4601-4655) and implementing regulations at 49 CFR Part 24. It has in effect and is following a residential anti-displacement and relocation assistance plan required under 24 CFR Part 42 in connection with any activity assisted with funding under the Community Development Block Grant or HOME programs.

Anti-Lobbying --To the best of the jurisdiction's knowledge and belief:

1. No Federal appropriated funds have been paid or will be paid, by or on behalf of it, to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with the awarding of any Federal contract, the making of any Federal grant, the making of any Federal loan, the entering into of any cooperative agreement, and the extension, continuation, renewal, amendment, or modification of any Federal contract, grant, loan, or cooperative agreement;
2. If any funds other than Federal appropriated funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this Federal contract, grant, loan, or cooperative agreement, it will complete and submit Standard Form-LLL, "Disclosure Form to Report Lobbying," in accordance with its instructions; and
3. It will require that the language of paragraph 1 and 2 of this anti-lobbying certification be included in the award documents for all subawards at all tiers (including subcontracts, subgrants, and contracts under grants, loans, and cooperative agreements) and that all subrecipients shall certify and disclose accordingly.

Authority of Jurisdiction --The consolidated plan is authorized under State and local law (as applicable) and the jurisdiction possesses the legal authority to carry out the programs for which it is seeking funding, in accordance with applicable HUD regulations.

Consistency with plan --The housing activities to be undertaken with Community Development Block Grant, HOME, Emergency Solutions Grant, and Housing Opportunities for Persons With AIDS funds are consistent with the strategic plan in the jurisdiction's consolidated plan.

Section 3 -- It will comply with section 3 of the Housing and Urban Development Act of 1968 (12 U.S.C. 1701u) and implementing regulations at 24 CFR Part 135.

Signature of Authorized Official

Date

Title

Specific Community Development Block Grant Certifications

The Entitlement Community certifies that:

Citizen Participation -- It is in full compliance and following a detailed citizen participation plan that satisfies the requirements of 24 CFR 91.105.

Community Development Plan -- Its consolidated plan identifies community development and housing needs and specifies both short-term and long-term community development objectives that have been developed in accordance with the primary objective of the CDBG program (i.e., the development of viable urban communities, by providing decent housing and expanding economic opportunities, primarily for persons of low and moderate income) and requirements of 24 CFR Parts 91 and 570.

Following a Plan -- It is following a current consolidated plan that has been approved by HUD.

Use of Funds -- It has complied with the following criteria:

1. Maximum Feasible Priority. With respect to activities expected to be assisted with CDBG funds, it has developed its Action Plan so as to give maximum feasible priority to activities which benefit low- and moderate-income families or aid in the prevention or elimination of slums or blight. The Action Plan may also include CDBG-assisted activities which the grantee certifies are designed to meet other community development needs having particular urgency because existing conditions pose a serious and immediate threat to the health or welfare of the community, and other financial resources are not available (see Optional CDBG Certification).

2. Overall Benefit. The aggregate use of CDBG funds, including Section 108 guaranteed loans, during program year(s) 2019 [a period specified by the grantee of one, two, or three specific consecutive program years], shall principally benefit persons of low and moderate income in a manner that ensures that at least 70 percent of the amount is expended for activities that benefit such persons during the designated period.

3. Special Assessments. It will not attempt to recover any capital costs of public improvements assisted with CDBG funds, including Section 108 loan guaranteed funds, by assessing any amount against properties owned and occupied by persons of low and moderate income, including any fee charged or assessment made as a condition of obtaining access to such public improvements.

However, if CDBG funds are used to pay the proportion of a fee or assessment that relates to the capital costs of public improvements (assisted in part with CDBG funds) financed from other revenue sources, an assessment or charge may be made against the property with respect to the public improvements financed by a source other than CDBG funds.

In addition, in the case of properties owned and occupied by moderate-income (not low-income) families, an assessment or charge may be made against the property for public improvements financed by a source other than CDBG funds if the jurisdiction certifies that it lacks CDBG funds to cover the assessment.

Excessive Force -- It has adopted and is enforcing:

1. A policy prohibiting the use of excessive force by law enforcement agencies within its jurisdiction against any individuals engaged in non-violent civil rights demonstrations; and
2. A policy of enforcing applicable State and local laws against physically barring entrance to or exit from a facility or location which is the subject of such non-violent civil rights demonstrations within its jurisdiction.

Compliance with Anti-discrimination laws -- The grant will be conducted and administered in conformity with title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000d) and the Fair Housing Act (42 U.S.C. 3601-3619) and implementing regulations.

Lead-Based Paint -- Its activities concerning lead-based paint will comply with the requirements of 24 CFR Part 35, Subparts A, B, J, K and R.

Compliance with Laws -- It will comply with applicable laws.

Signature of Authorized Official

Date

Title

OPTIONAL Community Development Block Grant Certification

Submit the following certification only when one or more of the activities in the action plan are designed to meet other community development needs having particular urgency as specified in 24 CFR 570.208(c):

The grantee hereby certifies that the Annual Plan includes one or more specifically identified CDBG-assisted activities which are designed to meet other community development needs having particular urgency because existing conditions pose a serious and immediate threat to the health or welfare of the community and other financial resources are not available to meet such needs.

Not Applicable.

Signature of Authorized Official

Date

Title

Specific HOME Certifications

The HOME participating jurisdiction certifies that:

Tenant Based Rental Assistance -- If it plans to provide tenant-based rental assistance, the tenant-based rental assistance is an essential element of its consolidated plan.

Eligible Activities and Costs -- It is using and will use HOME funds for eligible activities and costs, as described in 24 CFR §§92.205 through 92.209 and that it is not using and will not use HOME funds for prohibited activities, as described in §92.214.

Subsidy layering -- Before committing any funds to a project, it will evaluate the project in accordance with the guidelines that it adopts for this purpose and will not invest any more HOME funds in combination with other Federal assistance than is necessary to provide affordable housing;

Signature of Authorized Official

Date

Title

Emergency Solutions Grants Certifications

The Emergency Solutions Grants Program recipient certifies that:

Major rehabilitation/conversion/renovation – If an emergency shelter’s rehabilitation costs exceed 75 percent of the value of the building before rehabilitation, the recipient will maintain the building as a shelter for homeless individuals and families for a minimum of 10 years after the date the building is first occupied by a homeless individual or family after the completed rehabilitation.

If the cost to convert a building into an emergency shelter exceeds 75 percent of the value of the building after conversion, the recipient will maintain the building as a shelter for homeless individuals and families for a minimum of 10 years after the date the building is first occupied by a homeless individual or family after the completed conversion.

In all other cases where ESG funds are used for renovation, the recipient will maintain the building as a shelter for homeless individuals and families for a minimum of 3 years after the date the building is first occupied by a homeless individual or family after the completed renovation.

Essential Services and Operating Costs – In the case of assistance involving shelter operations or essential services related to street outreach or emergency shelter, the recipient will provide services or shelter to homeless individuals and families for the period during which the ESG assistance is provided, without regard to a particular site or structure, so long the recipient serves the same type of persons (e.g., families with children, unaccompanied youth, disabled individuals, or victims of domestic violence) or persons in the same geographic area.

Renovation – Any renovation carried out with ESG assistance shall be sufficient to ensure that the building involved is safe and sanitary.

Supportive Services – The recipient will assist homeless individuals in obtaining permanent housing, appropriate supportive services (including medical and mental health treatment, victim services, counseling, supervision, and other services essential for achieving independent living), and other Federal, State, local, and private assistance available for these individuals.

Matching Funds – The recipient will obtain matching amounts required under 24 CFR 576.201.

Confidentiality – The recipient has established and is implementing procedures to ensure the confidentiality of records pertaining to any individual provided family violence prevention or treatment services under any project assisted under the ESG program, including protection against the release of the address or location of any family violence shelter project, except with the written authorization of the person responsible for the operation of that shelter.

Homeless Persons Involvement – To the maximum extent practicable, the recipient will involve, through employment, volunteer services, or otherwise, homeless individuals and families in constructing, renovating, maintaining, and operating facilities assisted under the ESG program, in providing services assisted under the ESG program, and in providing services for occupants of facilities assisted under the program.

Consolidated Plan – All activities the recipient undertakes with assistance under ESG are consistent with its consolidated plan.

Discharge Policy – The recipient will establish and implement, to the maximum extent practicable and where appropriate, policies and protocols for the discharge of persons from publicly funded institutions or systems of care (such as health care facilities, mental health facilities, foster care or other youth facilities, or correction programs and institutions) in order to prevent this discharge from immediately resulting in homelessness for these persons.

Signature of Authorized Official

Date

Title

Housing Opportunities for Persons With AIDS Certifications

The HOPWA grantee certifies that:

Activities -- Activities funded under the program will meet urgent needs that are not being met by available public and private sources.

Building -- Any building or structure assisted under that program shall be operated for the purpose specified in the consolidated plan:

1. For a period of not less than 10 years in the case of assistance involving new construction, substantial rehabilitation, or acquisition of a facility,
2. For a period of not less than 3 years in the case of assistance involving non-substantial rehabilitation or repair of a building or structure.

Not applicable.

Signature of Authorized Official

Date

Title

APPENDIX TO CERTIFICATIONS

INSTRUCTIONS CONCERNING LOBBYING CERTIFICATION:

Lobbying Certification

This certification is a material representation of fact upon which reliance was placed when this transaction was made or entered into. Submission of this certification is a prerequisite for making or entering into this transaction imposed by section 1352, title 31, U.S. Code. Any person who fails to file the required certification shall be subject to a civil penalty of not less than \$10,000 and not more than \$100,000 for each such failure.

Appendix - Alternate/Local Data Sources

1	<p>Data Source Name - 2019 Housing Inventory Chart</p> <p>List the name of the organization or individual who originated the data set. The Lee County Continuum of Care, in coordination with the Lee County Homeless Coalition and Lee County Human and Veteran Services.</p> <p>Provide a brief summary of the data set. A count of the beds and units available for emergency, transitional and permanent supportive housing in Lee County, Florida.</p> <p>What was the purpose for developing this data set? To meet federal requirements and to have a count of the County's beds.</p> <p>How comprehensive is the coverage of this administrative data? Is data collection concentrated in one geographic area or among a certain population? This is concentrated to Lee County, Florida.</p> <p>What time period (provide the year, and optionally month, or month and day) is covered by this data set? This data set was completed in April 2019.</p> <p>What is the status of the data set (complete, in progress, or planned)? In Progress.</p>
2	<p>Data Source Name - 2019 Homeless Point in Time Count</p> <p>List the name of the organization or individual who originated the data set. The Lee County Continuum of Care, in coordination with the Lee County Homeless Coalition and Lee County Human and Veteran Services.</p> <p>Provide a brief summary of the data set. Data results from the annual point in time count of the County's homeless population.</p> <p>What was the purpose for developing this data set? The count is conducted annually to meet federal requirements and to establish numbers and characteristics of homeless individuals and families.</p> <p>Provide the year (and optionally month, or month and day) for when the data was collected. This count was conducted January 27, 2018.</p> <p>Briefly describe the methodology for the data collection. Client-level surveys are collect the night of the count and at service based locations. Information is de-duplicated through a comparison of personally identifying information (PII), such as names, dates of birth, and social security number.</p> <p>Describe the total population from which the sample was taken. The data is collected in Lee County, Florida.</p>

	Describe the demographics of the respondents or characteristics of the unit of measure, and the number of respondents or units surveyed.
3	Data Source Name - American Community Survey 2011-2015
	List the name of the organization or individual who originated the data set. United States Census Bureau
	Provide a brief summary of the data set. The American Community Survey is accessed via American FactFinder, which provides access to data about the United States. The data in American FactFinder comes from several censuses and surveys.
	What was the purpose for developing this data set? This data set supplements the decennial census with additional information about housing, income, and other characteristics.
	How comprehensive is the coverage of this administrative data? Is data collection concentrated in one geographic area or among a certain population? The data is collected continuously and issued in five-year sets, which can be geographically isolated.
	What time period (provide the year, and optionally month, or month and day) is covered by this data set? This set covers 2011-2015.
	What is the status of the data set (complete, in progress, or planned)? Complete.
	Data Source Name - 2013-2017 American Community Survey 5-Year Est.
4	List the name of the organization or individual who originated the data set. U.S. Census Bureau
	Provide a brief summary of the data set. Data set is the 2013-2017, 5-year estimate from American Community Survey
	What was the purpose for developing this data set? The data set was developed by the U.S. Census Bureau, and created to provide the most up to date data for use in the 2019-2023 Lee County Consolidated Plan.
	How comprehensive is the coverage of this administrative data? Is data collection concentrated in one geographic area or among a certain population? The administrative data covers the entire Urban County Jurisdiction.
	What time period (provide the year, and optionally month, or month and day) is covered by this data set? 2013-2017 American Community Survey Estimates
	What is the status of the data set (complete, in progress, or planned)? Complete
	Data Source Name - 2011-2015 CHAS

5	<p>List the name of the organization or individual who originated the data set.</p> <p>U.S. Department of Housing and Urban Development compiled from ACS Data from the U.S. Census Bureau.</p>
	<p>Provide a brief summary of the data set.</p> <p>The data is a compilation of the ACS data for use in the Consolidated Planning process, and includes housing problems and needs for low-income persons.</p>
	<p>What was the purpose for developing this data set?</p> <p>The CHAS data are used by local governments to plan how to spend HUD funds, and may also be used by HUD to distribute grant funds.</p>
	<p>How comprehensive is the coverage of this administrative data? Is data collection concentrated in one geographic area or among a certain population?</p> <p>The data includes all areas of Lee County.</p>
	<p>What time period (provide the year, and optionally month, or month and day) is covered by this data set?</p> <p>2011-2015</p>
	<p>What is the status of the data set (complete, in progress, or planned)?</p> <p>Complete</p>
	6
<p>List the name of the organization or individual who originated the data set.</p> <p>Housing Authority for the City of Fort Myers (HACFM)</p>	
<p>Provide a brief summary of the data set.</p> <p>Data provided by HACFM regarding the number of units and vouchers, and characteristics of PHA residents.</p>	
<p>What was the purpose for developing this data set?</p> <p>Data was gathered for the completion of Lee County's 2019-2023 Consolidated Plan.</p>	
<p>Provide the year (and optionally month, or month and day) for when the data was collected.</p> <p>Data was provided in March 2019.</p>	
<p>Briefly describe the methodology for the data collection.</p> <p>Data was gathered by examining internal PHA records and compiled by HACFM staff.</p>	
<p>Describe the total population from which the sample was taken.</p> <p>Sample was taken from total population on PHA residents and voucher holders.</p>	
<p>Describe the demographics of the respondents or characteristics of the unit of measure, and the number of respondents or units surveyed.</p> <p>Sample was taken from total population on PHA residents and voucher holders.</p>	