



2022-2026

CONSOLIDATED PLAN

BUILDING RESILIENT COMMUNITIES



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EXECUTIVE SUMMARY

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

1. Introduction

Every five years, Orange County must prepare a strategic plan (known as the Consolidated Plan) which governs the use of federal housing and community development grant funds that it receives from the United States Department of Housing and Urban Development (HUD). When preparing a Consolidated Plan, grantees must assess the needs and issues in their jurisdictions as a part of their preparation of these documents.

The grant funds received from HUD by Orange County that are covered in the Consolidated Plan include:

- Community Development Block Grant (CDBG) Program
- HOME Investment Partnerships (HOME) Program
- Emergency Solutions Grant (ESG) Program

Orange County must also submit to HUD separate Annual Action Plans for each of the five years during the Consolidated Plan period. The Annual Action Plans serve as the County's yearly applications to HUD that are required for the County to receive the annual allocations from the three grant programs. These grants from HUD are known as Entitlement Grant Programs because communities receive the funds every year if they meet program requirements and criteria associated with each of the three grants. Under HUD's grant program regulations, Orange County may use its CDBG, HOME and ESG grant funds in unincorporated areas of the County, as well as the cities of Apopka, Winter Park, Maitland, and Ocoee, which are considered participating jurisdictions and have interlocal agreements in place with Orange County to share in the HUD-funded programs.

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

When preparing a Consolidated Plan, grantees must assess the needs in their jurisdictions as a key part of the process. To inform development of priorities and goals over the next five years, the Consolidated Plan's Needs Assessment discusses housing, community development, and economic development needs in the County. The Needs Assessment relies on data from the US Census, 2011-2015 5-Year American Community Survey (ACS), and a special tabulation of ACS data known as Comprehensive Housing Affordability Strategy (CHAS) data that estimates the number of households with one or more housing needs. Local data regarding homelessness and the County's established sustainability and resiliency goals is included. Finally, public input gathered through focus groups, neighborhood meetings, and a community survey are coupled with data analysis

to identify priority needs related to affordable housing, homelessness, assisted housing, community development, and economic development in Orange County.

Orange County's 2022-2026 Five-Year Consolidated Plan is centered around these three goals:

- Transform low to moderate-income communities into resilient communities.
- Expand and preserve housing affordability, safety, and stability for low to moderate-income households and vulnerable populations.
- Work in collaboration with local government agencies, nonprofit organizations, and industry partners to eradicate and prevent homelessness.

3. Evaluation of past performance

The County's Consolidated Annual Performance and Evaluation Reports (CAPERs) summarize the activities, outcomes and financial expenditures that occurred during each program year, evaluating the County's performance against the goals set in the previous Consolidated Plan. A five-year summary of accomplishments compiled from available CAPERs, beginning with the 2016-2017 program year through the 2020-2021 program year, is reported below.

Goal 1: Provide Affordable Housing

- 1,406 rental and 422 owner-occupied units were rehabilitated (CDBG, HOME, SHIP, and local revenue);
- 700 affordable rental and 69 affordable owner-occupied units were added (CDBG, local revenue, SHIP, NSP);
- 658 households received down payment assistance (SHIP, NSP);
- 3,466 persons received pre-purchase education and counseling (SHIP); and
- 6,861 households received rental assistance (HOME, Section 8, HUD-VASH, Shelter Plus Care, TBRA, and Mainstream Vouchers).

Goal 2: Enhance the Quality of Life

- 14 public facilities were rehabilitated/constructed and, as a result, 16,137 individuals have new or improved access to services (CDBG);
- 338 jobs were created/filled by funded programs (mostly CDBG);
- 45 fair housing events were held, and over 2,000 persons received fair housing education and training (CDBG); and
- 8,498 individuals were assisted with various public services (CDBG).

Goal 3: Eliminate Homelessness

- 5,076 persons, including victims of domestic violence, were provided with overnight shelter (ESG);
- 149 households received homelessness prevention services; and
- 1,377 households were assisted with rapid re-housing and/or rental assistance services (ESG, HUD-VASH, Shelter Plus Care, local revenue, and SHIP).

4. Summary of citizen participation process and consultation process

Orange County residents were invited to participate in the planning process by taking a survey, completing a comment form, attending neighborhood meetings, and visiting a project website to learn more about the planning process. In addition to these options offered to members of the public, County staff conducted in-depth focus groups with key stakeholders and groups representing a variety of viewpoints relevant to the development of the Consolidated Plan. Priorities identified during the public engagement were used to guide the strategic plan, including the Consolidated Plan priorities and description of possible activities.

Community Survey: A Housing and Community Development Survey was available to residents in both English and Spanish formats via the project website, www.yourOCFLplans.com. Hard copies of the survey were also distributed by County staff at in-person neighborhood meetings. The survey was available beginning May 3, 2022 and had received 78 responses as of the date the Consolidated Plan was initially drafted.

Neighborhood Meetings: The County engaged residents in 9 different low- and moderate-income neighborhoods by joining standing neighborhood meetings. In these meetings, County staff and members of the planning team shared information about the Consolidated Plan process, examples of how the County has used HUD funding in the past, described available options to engage further through the survey or comment forms, and, when time permitted, facilitated discussion among meeting attendees around needs and priorities within the community. Approximately 115 members of the public participated in one of these neighborhood meetings.

Project Website: The project website at www.yourOCFLplans.com offered a page of information about the County's HUD grant programs, links to the English and Spanish survey versions, and a web-based comment form for residents to share thoughts and ideas with the planning team. As of the date of the initial draft of the Consolidated Plan, the project website had logged 734 pageviews by 200 different users.

Stakeholder Focus Groups: In February 2022, the County held four stakeholder focus groups with a total of 36 participants representing nonprofit and service organizations, fair housing advocates, affordable housing providers, County staff, and the County's cooperating municipalities. The planning team also conducted individual consultations with 5 additional stakeholders representing the Orlando and Winter Park housing authorities, Homeless Services Network of Central Florida, the Orange County Innovation and Emerging Technology Office (broadband needs), and the Orange County Sustainability and Resilience Office (hazard mitigation needs).

Public Comment Period: The County held a 30-day comment period from June 13, 2022 to July 13, 2022. During the comment period, the draft Consolidated Plan, Annual Action Plan, and Citizen Participation Plan were made available for review at the following locations and online:

Orange County Housing and Community Development Division
525 E. South Street, Orlando, FL 32801

Orange County Public Library
Planning and Local Government Section, Third Floor
101 E. Central Ave., Orlando, FL 32801

Orange County Housing and Community Development web page:
<http://www.ocfl.net/NeighborsHousing/CommunityDevelopment.aspx>

The County received 3 public comments via email during the public comment period.

Public Hearing: A public hearing was conducted on June 15, 2022 at 6:00 p.m. at the Largo Training Room located on the 1st Floor of the Orange County Internal Operations Centre I (450 E. South St, Orlando, Florida 32801). Representatives from the Orange County Housing and Community Development Division and the Community Development Advisory Board were present to receive citizen comments on the priority needs and proposed activities to be included in the 2022-2026 Orange County Consolidated Plan and the 2022-2023 One-Year Action Plan, as well as any comments on the updated Orange County Citizen Participation Plan. There were no comments from the public during the hearing.

5. Summary of public comments

The County held a 30-day comment period from June 13, 2022 to July 13, 2022 and invited members of the public to attend a public hearing on June 15, 2022 to receive input from residents and stakeholders on the draft Consolidated Plan prior to approval by the Board of County Commissioners and submission to HUD. During the comment period, the County received 3 public comments via email; no comments were received during the public hearing. The public comments received were all expressions of support for various Orange County Housing and Community Development programs from beneficiaries. These are summarized below:

- The County's Down Payment Assistance Program was instrumental in helping a resident realize the dream of homeownership when she'd previously felt owning her own home was out of reach.
- A County resident who worked as a nurse for 20 years became disabled and was no longer able to keep up with necessary home repairs. The County's Homeowner Rehabilitation program repaired everything that was broken, from replacing plumbing to fresh exterior paint, to an updated air conditioner and duct work. This resident credits the program with saving her life.
- Another resident who has lived in their Orange County home for over 20 years expressed gratitude for the renovations they received through the County's Homeowner Rehabilitation program and said they love the work that was done.

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

All citizen comments received have been accepted by the County and are incorporated into the final plan documents in accordance with 24 CFR Part 91.

7. Summary

During the development of the Consolidated Plan, a set of priority needs were identified. These priorities include housing affordability and condition, capital improvements, public services, homeless services, and program administration. The Consolidated Plan outlines an array of financial resources expected to be available to address these priorities over the 2022-2026 plan period and contains goals, measurable objectives, and implementation actions for each of the plan's elements.

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

The following are the agencies/entities responsible for preparing the Consolidated Plan and those responsible for administration of each grant program and funding source.

Table 1 – Responsible Agencies

Agency Role	Name	Department/Agency
CDBG Administrator	Orange County	PEDS/Housing and Community Development
HOME Administrator	Orange County	PEDS/Housing and Community Development
ESG Administrator	Orange County	PEDS/Housing and Community Development

Narrative

The Orange County Housing and Community Development Division, which is part of the Planning, Environmental, and Development Services Department (PEDS), serves as the lead agency responsible for administering the programs and activities outlined in the 2022-2026 Consolidated Plan and the 2022-2023 Action Plan. The County's previous 2016-2020 Consolidated Plan was granted a one-year extension by HUD, thereby adding a sixth annual action plan (the FY 2021-2022 Action Plan) responding to the Consolidated Plan's goals and objectives.

Orange County last completed an Urban County re-qualification process in 2020. As a result, the County currently has Community Development Block Grant (CDBG) interlocal agreements with the cities of Apopka, Winter Park, Maitland, and Ocoee for the PYs 2021-2023.

Consolidated Plan Public Contact Information

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PR-10 Consultation – 91.100, 91.110, 91.200(b), 91.300(b), 91.215(I) and 91.315(I)

1. Introduction

Orange County conducted an array of in-person and virtual engagement opportunities to inform the Consolidated Plan's goals and priorities. In February 2022, the County held four stakeholder focus groups with a total of 36 participants representing nonprofit and service organizations, fair housing advocates, affordable housing providers, County staff, and the County's cooperating cities. The planning team also conducted individual consultations with 5 additional stakeholders representing the Orlando and Winter Park housing authorities, Homeless Services Network of Central Florida, the Orange County Innovation and Emerging Technology Office (broadband needs), and the Orange County Sustainability and Resilience Office (hazard mitigation needs). Additionally, in May and June, Orange County engaged the wider general public, inviting residents to participate by taking a survey, completing a comment form, attending neighborhood meetings, and visiting a project website to learn more about the planning process.

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)).

To enhance coordination between public and private housing and social service agencies, the County has built and maintained strong relationships with many partner organizations serving Orange County. These ongoing partnerships, which are important for the success of the County's HUD-funded activities are just as important for their role in streamlining a coordinated approach to meeting needs among providers of public and assisted housing, and private and governmental healthcare, and mental health and service agencies. To this end, Orange County has actively coordinated with the following organizations:

- **Affordable Housing Advisory Board (AHAB)** meets regularly to review existing and proposed policies and procedures, ordinances, land development regulations, affordable housing incentives, and programs that influence the affordability of housing. AHAB also provides input on the activities and projects being implemented with the Local Affordable Housing Trust Fund.
- **Community Development Advisory Board (CDAB)**, which serves as a liaison between the Board of County Commissioners, the Housing and Community Development Division, and Orange County residents, meets regularly to review Request for the Applications proposals for CDBG public services, housing and capital improvement projects, and ESG funding, as well as supplemental CDBG-CV and ESG-CV funding, and to provide input on the Action Plan.
- **Homeless Services Network of Central Florida, Inc. (HSN)** serves as the lead agency for the Continuum of Care (CoC) in the area and was consulted on issues related to

homelessness. The Division staff attend monthly CoC general membership meetings and subcommittee meetings to monitor homelessness trends. HSN will also play a large role in the consultation process needed for the development of the HOME-ARP Allocation Plan. Preliminary discussions have already begun.

- **Regional CDBG Grantees**, including the City of Orlando, were consulted to ensure coordination on projects funded cooperatively and other issues of regional importance, such as affordable housing.
- **Homebuyer Education Counseling** was conducted by three non-profit agencies – HANDS of Central Florida, Inc., Consumer Credit Counseling Services, and Housing and Education Alliance, Inc. – to provide pre-purchase counseling and homebuyer education trainings through the SHIP program.
- **County Departments and Divisions** – The Housing and Community Development Division coordinates with the Planning Division on such activities as the Housing and Future Land Use Elements of the Comprehensive Plan, Land Development Code (affordable and workforce housing standards), implementation of the Housing for All 10-Year Action Plan, and the Local Affordable Housing Trust Fund. The Division also works closely with the Real Estate Management Division to identify lots suitable for development of affordable housing units. Other County Departments and Divisions are consulted, as needed.
- **Housing Authorities** located within Orange County – the Orlando Housing Authority (OHA) and Winter Park Housing Authority (WPHA) – provided significant input for this Consolidated Plan.
- **Community Housing Development Organizations (CHDOs)** – Under the HOME program, the County encourages private and nonprofit organizations to apply for certification as a CHDO. A minimum of 15% of the annual HOME allocation is set aside for use by CHDOs in the development of affordable housing.
- **Providers of Social Services/COVID-19 Response** – In Spring of 2021, Orange County held several focus group discussions with partners in the community, to include providers of homeless services, providers of services for special needs populations, as well as other social service agencies, to solicit input on the changing needs related to the COVID-19 pandemic and other priorities, to better coordinate the community response, and to avoid duplication of services among providers and various funding streams.

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

The Orange County Housing and Community Development Division works in conjunction with the Homeless Services Network of Central Florida, Inc. (HSN), the lead agency for the local Continuum of Care (CoC), also known as the Central Florida Commission on Homelessness, to enhance coordination of community projects and programs. The County plans to continue to

attend monthly membership meetings with the Central Florida Commission on Homelessness, which helps coordinate services between homeless individuals, homeless providers, and health and mental health organizations. The County also participates annually in the Continuum of Care's Point-in-Time count and will partner with HSN to align policies and priorities related to homelessness.

The Continuum of Care uses the Housing First approach to ending homelessness, which prioritizes providing permanent housing to people experiencing homelessness before attending to anything less critical, such as getting a job, budgeting, or addressing substance abuse issues. The Continuum of Care's permanent supportive housing (PSH) programs, which include wrap around services, are key to keeping formerly homeless persons in housing. The County utilizes federal Shelter Plus Care funding to provide permanent supportive housing for people with disabilities.

Over the next five years, the County anticipates allocating a combination of CDBG and ESG funds to provide rapid rehousing and case management services for individuals and families experiencing 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

Orange County continues to coordinate with HSN to align policies and priorities related to homelessness. Such priorities include the use of Homeless Management Information System (HMIS), Coordinated Entry System (CES) and the Housing First approach by all ESG-funded agencies. The coordination is achieved through the County's participation in the monthly CoC general membership meetings, various subcommittee meetings, and the HSN's participation in the review and scoring of annual applications for the County's ESG funding. Orange County also regularly utilizes ESG dollars to fund management and administration of the HIMS. Finally, the County staff participates in review of the draft Continuum-wide ESG policies and standards for a variety of homeless programs and activities.

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

Table 2 – Agencies, groups, organizations who participated

Agency/Groups/ Organization Name	Type	Section of Plan Addressed	Consultation Method
1 CareerSource Central Florida	<ul style="list-style-type: none"> Services- Employment 	<ul style="list-style-type: none"> Non-Homeless Special Needs Economic Development Anti-poverty Strategy 	Focus Group
2 Central Florida Regional Housing Trust	<ul style="list-style-type: none"> Housing Services - Housing 	<ul style="list-style-type: none"> Housing Need Assessment Market Analysis Anti-poverty Strategy 	Focus Group

Agency/Groups/ Organization Name		Type	Section of Plan Addressed	Consultation Method
3	Central Florida Urban League, Inc.	<ul style="list-style-type: none"> • Services-Education • Services-Employment 	<ul style="list-style-type: none"> • Non-Homeless Special Needs • Economic Development • Anti-poverty Strategy 	Focus Group
4	City of Apopka	<ul style="list-style-type: none"> • Other government - Local 	<ul style="list-style-type: none"> • Housing Need Assessment • Non-Homeless Special Needs • Market Analysis 	Focus Group
5	City of Maitland	<ul style="list-style-type: none"> • Other government - Local 	<ul style="list-style-type: none"> • Housing Need Assessment • Non-Homeless Special Needs • Market Analysis 	Focus Group
6	City of Ocoee	<ul style="list-style-type: none"> • Other government - Local 	<ul style="list-style-type: none"> • Housing Need Assessment • Non-Homeless Special Needs • Market Analysis 	Focus Group
7	City of Winter Park	<ul style="list-style-type: none"> • Other government - Local 	<ul style="list-style-type: none"> • Housing Need Assessment • Non-Homeless Special Needs • Market Analysis 	Focus Group
8	Community Coordinated Care for Children, Inc.	<ul style="list-style-type: none"> • Services-Children • Services-Education 	<ul style="list-style-type: none"> • Non-Homeless Special Needs • Economic Development • Anti-poverty Strategy 	Focus Group
9	Community Development Advisory Board	<ul style="list-style-type: none"> • Planning Organization • Civic Leaders 	<ul style="list-style-type: none"> • Housing Need Assessment • Homeless Needs - Chronically homeless • Homeless Needs - Families with children • Homelessness Needs - Veterans • Homelessness Needs - Unaccompanied youth • Homelessness Strategy • Non-Homeless Special Needs • Economic Development • Anti-poverty Strategy 	Meeting, Focus Group
10	Community Legal Services of Mid-Florida, Inc.	<ul style="list-style-type: none"> • Services - Fair Housing • Regional Organization 	<ul style="list-style-type: none"> • Non-Homeless Special Needs • Anti-poverty Strategy 	Focus Group
11	Consumer Credit Counseling Service	<ul style="list-style-type: none"> • Services-Education • Services - Fair Housing 	<ul style="list-style-type: none"> • Non-Homeless Special Needs • Anti-poverty Strategy 	Focus Group

Agency/Groups/ Organization Name		Type	Section of Plan Addressed	Consultation Method
12	Habitat for Humanity Orange and Osceola County, Inc.	<ul style="list-style-type: none"> Housing Services – Housing 	<ul style="list-style-type: none"> Housing Need Assessment Market Analysis Lead-based Paint Strategy Anti-poverty Strategy 	Focus Group
13	Habitat for Humanity Seminole County and Greater Apopka, Inc.	<ul style="list-style-type: none"> Housing Services – Housing 	<ul style="list-style-type: none"> Housing Need Assessment Market Analysis Lead-based Paint Strategy Anti-poverty Strategy 	Focus Group
14	Hannibal Square Community Land Trust, Inc.	<ul style="list-style-type: none"> Housing Services – Housing 	<ul style="list-style-type: none"> Housing Need Assessment Market Analysis 	Focus Group
15	Hispanic Federation, Inc.	<ul style="list-style-type: none"> Services-Education Services-Health Other: Immigration 	<ul style="list-style-type: none"> Non-Homeless Special Needs Anti-poverty Strategy 	Focus Group
16	Homeless Services Network of Central Florida, Inc.	<ul style="list-style-type: none"> Services – Housing Services – Homeless Regional Organization Publicly Funded Institution/System of Care 	<ul style="list-style-type: none"> Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy Anti-poverty Strategy 	Focus Group
17	Jewish Family Services of Greater Orlando, Inc.	<ul style="list-style-type: none"> Services – Housing Services-Children Services-Elderly Persons Services-Homeless Services-Health Services-Education Services-Employment 	<ul style="list-style-type: none"> Non-Homeless Special Needs Anti-poverty Strategy 	Focus Group
18	Legal Aid Society of Orange County Bar Association, Inc.	<ul style="list-style-type: none"> Services - Fair Housing 	<ul style="list-style-type: none"> Non-Homeless Special Needs Anti-poverty Strategy 	Focus Group

Agency/Groups/ Organization Name		Type	Section of Plan Addressed	Consultation Method
19	Orange County Housing and Community Development Division	<ul style="list-style-type: none"> • Housing • PHA • Services – Housing • Services – Fair Housing 	<ul style="list-style-type: none"> • Housing Need Assessment • Public Housing Needs • Homeless Needs - Chronically homeless • Homeless Needs - Families with children • Homelessness Needs - Veterans • Homelessness Needs - Unaccompanied youth • Homelessness Strategy • Non-Homeless Special Needs • Market Analysis • Economic Development • Lead-based Paint Strategy • Anti-poverty Strategy 	Meeting, Focus Group, Interview
20	Orange County Innovation and Emerging Technology Office	<ul style="list-style-type: none"> • Services - Broadband Internet Service Providers • Services - Narrowing the Digital Divide 	<ul style="list-style-type: none"> • Market Analysis 	Interview
21	Orange County Sustainability and Resilience Office	<ul style="list-style-type: none"> • Agency - Managing Flood Prone Areas • Agency - Management of Public Land or Water Resources • Agency - Emergency Management 	<ul style="list-style-type: none"> • Market Analysis 	Interview
22	Orange County Community Action Division	<ul style="list-style-type: none"> • Services-Children • Services-Elderly Persons 	<ul style="list-style-type: none"> • Non-Homeless Special Needs • Anti-poverty Strategy 	Focus Group
23	Orange County Facilities Management Division	<ul style="list-style-type: none"> • Other government - County • Grantee Department 	<ul style="list-style-type: none"> • Non-Homeless Special Needs • Anti-poverty Strategy 	Focus Group
24	Orange County Mental Health and Homelessness Division	<ul style="list-style-type: none"> • Services-Persons with Disabilities • Services-Homeless • Services-Health 	<ul style="list-style-type: none"> • Homeless Needs - Chronically homeless • Homeless Needs - Families with children • Homelessness Needs - Veterans • Homelessness Needs - Unaccompanied youth • Homelessness Strategy 	Focus Group
25	Orange County Neighborhood Preservation and Revitalization Division	<ul style="list-style-type: none"> • Housing • Services – Housing • Grantee Department 	<ul style="list-style-type: none"> • Housing Need Assessment • Market Analysis • Economic Development • Anti-poverty Strategy 	Focus Group

Agency/Groups/ Organization Name		Type	Section of Plan Addressed	Consultation Method
26	Orange County Planning and Environmental Services Department	<ul style="list-style-type: none"> • Other government - County • Planning Organization • Grantee Department 	<ul style="list-style-type: none"> • Housing Need Assessment • Market Analysis • Economic Development • Lead-based Paint Strategy • Anti-poverty Strategy 	Focus Group
27	Orlando Housing Authority	<ul style="list-style-type: none"> • Housing • PHA • Services - Housing • Services - Fair Housing 	<ul style="list-style-type: none"> • Housing Need Assessment • Public Housing Needs • Market Analysis 	Email
28	Orlando Neighborhood Improvement Corp., Inc.	<ul style="list-style-type: none"> • Housing • Services - Housing • Neighborhood Organization 	<ul style="list-style-type: none"> • Housing Need Assessment • Market Analysis • Economic Development • Lead-based Paint Strategy • Anti-poverty Strategy 	Focus Group
29	Pathlight HOME (Grand Avenue Economic Comm. Dev. Corp.)	<ul style="list-style-type: none"> • Services - Housing • Services-Homeless 	<ul style="list-style-type: none"> • Housing Need Assessment • Homeless Needs - Chronically homeless • Homeless Needs - Families with children • Homelessness Needs - Veterans • Economic Development • Lead-based Paint Strategy • Anti-poverty Strategy 	Focus Group
30	Winter Park Housing Authority	<ul style="list-style-type: none"> • Housing • PHA • Services - Housing • Services - Fair Housing 	<ul style="list-style-type: none"> • Housing Need Assessment • Public Housing Needs • Market Analysis 	Email

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

Efforts were made to consult a wide variety of community stakeholders throughout Orange County. No agency types were excluded from outreach efforts.

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

Table 3 - Other local / regional / federal planning efforts

Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
Housing For All 10-Year Action Plan	Housing For All Task Force	The Housing For All 10-Year Action Plan addresses housing affordability and supply, including specific action steps to removing regulatory barriers, creating new financial resources for housing, targeting areas of access and opportunity, and engaging the community and industry in the effort. These action steps significantly overlap the Consolidated Plan's housing priorities and goals.
Affordable Housing Trust Fund Plan	Orange County Housing and Community Development Division	The Affordable Housing Trust Fund, a program resulting from implementation of Housing For All Action Plan recommendations, was established by Orange County for the purpose of providing the financial resources and the leverage necessary to create and preserve affordable housing units. Trust Fund resources provide significant leveraging for Consolidated Plan housing activities and investments.
Destination 2030 Comprehensive Plan	Orange County Community, Environmental, and Development Services	The Comprehensive Plan represents the adopted goals, objectives, and policies of the County with regard to land use. Included in the plan are long-term goals and strategies for such areas as housing, neighborhoods, recreation, and public infrastructure. Consolidated Plan resources are available to the County for activities of these types and thus a review of the County's established goals is helpful in programming CDBG and related funding toward identified needs.
Orange County Comprehensive Emergency Management Plan	Orange County Office of Emergency Management	The Comprehensive Emergency Management Plan considers prevention, preparedness, mitigation, response, and recovery factors and outlines a framework for mobilization in the event of an emergency. The plan contains a hazard identification and vulnerability assessment relied upon in the research and analysis contained in the Consolidated Plan's market analysis relative to hazard mitigation.
Sustainable Operations and Resilience Action Plan	Orange County	The Action Plan outlines a strategy to achieve measurable goals within six focus areas such as water use, buildings and infrastructure, and energy. In incorporating resiliency as a priority within this Consolidated Plan, the Sustainable Operations and Resilience Action Plan helped generate discussion topics and themes for the public engagement process.
Central Florida Continuum of Care (CoC) Plan: Gaps, Opportunities and Challenges	Homeless Services Network of Central Florida, Inc.	This plan reviews the goals of the Central Florida Continuum of Care, assesses and prioritizes gaps in the service delivery system, and establishes a budget for programs and projects to overcome those gaps. The Consolidated Plan's goal of eradicating and preventing homelessness is consistent with, and overlaps these CoC goals.

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))

The County is pleased to cooperate in Florida's State Housing Initiatives Partnership (SHIP) Program, which provides funding for the County to produce and preserve affordable homeownership and rental housing. The State of Florida's SHIP funds supply a substantial source of revenue, in addition to Consolidated Plan resources, for qualified housing activities and County staff are in regular contact and coordination with the State regarding the program. The County uses SHIP funds primarily to provide affordable housing, with a portion designated for a pilot rapid re-housing program administered by Coalition for the Homeless of Central Florida, Inc.

The City of Orlando is located within Orange County; however, it is a separate entitlement jurisdiction and independently manages its own Consolidated Plan and allocations of HUD funds. While a separate program from that of Orange County, County staff recognize the benefit of close coordination and meet regularly with City of Orlando staff to discuss housing and community development activities, both planned and underway, to ensure efficient delivery of services and avoid duplication of efforts. Staff also consults frequently with the Orlando Housing Authority and Winter Park Housing Authority, both of which were consulted and provided substantial input on the sections of this Consolidated Plan related to public housing.

PR-15 Citizen Participation – 91.105, 91.115, 91.200(c) and 91.300(c)

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

Summarize citizen participation process and how it impacted goal-setting

To encourage public participation in community development activities throughout the County, and in keeping with HUD requirements, Orange County's Citizen Participation Plan, last amended in 2020, outlines an inclusive and intentional process to notify and engage the County's diverse residents in all stages of the planning process, including the identification of needs, setting of priorities, funding allocations, and implementation and evaluation of program activities. For this five-year Consolidated Plan, Orange County residents were invited to participate by taking a survey, completing a comment form, attending neighborhood meetings, and visiting a project website to learn more about the planning process.

In addition to these options offered to members of the public, County staff conducted in-depth focus groups with key stakeholders and groups representing a variety of viewpoints relevant to the development of the Consolidated Plan. Priorities identified during the public engagement were used to guide the strategic plan, including the Consolidated Plan priorities and description of possible activities.

The County engaged residents in 9 different low- and moderate-income neighborhoods by joining standing neighborhood meetings, listed below.

- **Tangelo Park**
Thursday, May 5; 6:00 – 8:00 p.m.
Tangelo Baptist Church
7001 Ravenna Avenue, Orlando
- **Azalea Park Safe Neighborhood**
Monday, May 9; 6:30pm
Christ the King Episcopal Church
26 Willow Drive, Orlando
- **Pine Hills Safe Neighborhood**
(virtual, via WebEx)
Thursday, May 12; 6:30pm
- **Orlo Vista Safe Neighborhood**
(virtual, via WebEx)
Tuesday, May 17; 7:00pm



- **North Lake Mann**
Thursday, May 19; 7:00 – 8:00 p.m.
Zion Church of Jesus Christ
3700 W. Robinson Street, Orlando
- **Pine Hills NID Advisory Council**
Wednesday, June 1; 9:00am
Barnett Park – Dolphin Room
4801 W. Colonial Drive, Orlando
- **Pine Castle Safe Neighborhood**
Monday, June 6; 7:00pm
- **People of Lockhart**
Tuesday, June 7; 6:30 – 7:30 p.m.
Lockhart Baptist Church
7601 Edgewater Drive, Orlando
- **Normandy Shores** (virtual, via conference call)
Thursday, June 16; 7:00 – 8:00 p.m.

Most of these meetings were held in-person and others were virtual, as determined by the custom of the hosting neighborhood organization and in adherence to public health and safety protocols. In these neighborhood meetings, County staff and members of the planning team shared information about the Consolidated Plan process, examples of how the County has used HUD funding in the past, described available options to engage further through the survey or comment forms, and, when time permitted, facilitated discussion among meeting attendees around needs and priorities within the community. Approximately 115 members of the public participated in one of these neighborhood meetings.



A Housing and Community Development Survey was available to residents in both English and Spanish formats via the project website, www.yourOCFLplans.com. Hard copies of the survey were also distributed by County staff at in-person neighborhood meetings listed above. The survey was available beginning May 3, 2022 and had received 78 responses as of the date the Consolidated Plan was initially drafted. The project website at www.yourOCFLplans.com offered a page of information about the County's HUD grant programs, links to the English and Spanish survey versions, and a web-based comment form for residents to share thoughts and ideas with the planning team. As of the date of the initial draft of the Consolidated Plan, the project website had logged 734 pageviews by 200 different users.

Further advertisement of the survey, website, and comment opportunities was conducted through press releases and social media posts. The County's Communications Division assisted with the distribution and posting of these materials, sending the press release to over 250 contacts which included local TV and radio stations, community newspapers, Hispanic media, and ethnic newspapers and publications.

In addition to all the above public outreach efforts, County staff conducted a series of four different focus groups in February 2022 with staff from a variety of organizations and agencies with an interest in community development and affordable housing concerns.

- Orange County Divisions and Departments
- Cooperating Cities
- Community Development Advisory Board and Nonprofit Organizations
- Fair and Affordable Housing Organizations

This early input from community stakeholders helped inform the public engagement process that followed. Through the focus groups, the County engaged a total 36 stakeholders. The planning team also conducted individual consultations with 5 additional stakeholders representing the Orlando and Winter Park housing authorities, Homeless Services Network of Central Florida, the Orange County Innovation and Emerging Technology Office (broadband needs), and the Orange County Sustainability and Resilience Office (hazard mitigation needs).

The County will hold a 30-day public comment period to receive comments on the draft 2022-2026 Consolidated Plan and 2022 Annual Action Plan from June 13 to July 13 of 2022. During this time, copies of the draft will be available for public review, and residents and stakeholders can provide written comments. Orange County will also hold a public hearing to present the draft plan and receive formal comments residents and stakeholders.

A summary of community outreach efforts and responses is shown below, with complete survey results and evidence of outreach materials available as an appendix.

Citizen Participation Outreach

Table 4 – Citizen Participation Outreach

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/ attendance	Summary of comments received	Summary of comments not accepted and reasons
1	Focus Groups	Other: Nonprofit and service organizations, fair housing advocates, affordable housing providers, County staff, cooperating cities	36 participants	<p><u>Community Development Advisory Board and Nonprofit Organizations</u></p> <ul style="list-style-type: none"> • There are many jobs open currently, but we need to make sure there are jobs available within certain communities and in short walking/ driving distances. Transportation is one of the barriers to employment, as well as availability of childcare. Need programs to connect people to jobs they qualified for, or train people for better jobs. • Many elderly persons are living on the fixed income. They are not able to afford basic housing. Many people are getting kicked out of their housing so landlords could increase rent. • Mental health is a major concern for our homeless community. They might not be taking their medications. Economic instability – not having a consistent job, food, housing contributes to the mental health concerns. • Entrepreneurship, mentorship, and internship programs are needed. They should be zip code specific so that only businesses in low-income areas can participate. <p><u>Fair and Affordable Housing Organizations</u></p> <ul style="list-style-type: none"> • Subsidized housing is necessary, there is an affordable housing crisis amplified by the pandemic. The support services are critical. Need to help people get out of situations (job opportunities, financial literacy, and self-sufficiency) so that they don't continuously need help. Break the generational cycle with education. • Florida is a very landlord-friendly state and there are not enough protections for tenants. It is difficult for tenant to fight evictions. Also, the fact that landlords can just raise rents, end the lease, etc. we don't have enough regulations to ensure healthy/safe living conditions that are livable. People are moving to Central Florida from other markets and willing to pay higher costs. • Financial literacy is important. Education and support services to help identify and remove housing barriers can help families bridge the gap. In many cases, the gap is not as big as people think. • Not everybody is meant to be a homeowner. With vulnerable populations, we need to focus more on services (such as financial literacy), to help them prepare for homeownership in the future. We need to provide additional services in addition to rental assistance. Subsidies should come with education. 	Not applicable.

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/ attendance	Summary of comments received	Summary of comments not accepted and reasons
				<p><u>Orange County Divisions and Departments</u></p> <ul style="list-style-type: none"> Public facilities, like community centers, need to be more inviting and attractive: benches, picnic tables, inviting spaces, outdoor and indoor seating, more parking, better lighting, furniture that is more comfortable for seniors, more youth-friendly (i.e. better computers and wi-fi). The County should continue funding home rehabilitation but should streamline services and set realistic expectations regarding wait times. The primary resiliency needs within low-income communities include housing, education about available resources, improved access to fresh food and health resources, and quality affordable childcare. <p><u>Cooperating Cities</u></p> <ul style="list-style-type: none"> To address the lack of affordable rental housing, County-funded programs should be creative and consider non-traditional options like tiny homes, manufactured housing, single-room occupancy units, etc. In addition to apartments, look to condominium model where residents are involved in running COA. The County could pay for training for residents to run the board and maintain the property. As an additional benefit the experience provides skills to apply for jobs. Challenges related to the production and preservation of affordable housing include the lack of available land, limitations on school capacity, and gaps in incentive programs. 	
2	Neighborhood Meetings	Non-targeted/broad community Minorities	115 resident attendees (approx.)	<p><u>Tangelo Park</u></p> <p>Orange County staff provided an overview of the consolidated planning process, examples of activities and projects funded in the area, and distributed flyers with a link to the website and community survey. About 50 attendees. Group was interested in beautification, sidewalk improvements, housing rehabilitation, and traffic safety.</p> <p><u>Azalea Park</u></p> <p>County Staff provided a 20-minute presentation about the importance of the 5-year Con Plan. Distributed flyers with the link to the website and community survey, and program information in English and Spanish. Attendees were concerned about the housing crisis and solutions for affordable housing.</p>	Not applicable.

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/ attendance	Summary of comments received	Summary of comments not accepted and reasons
				<p><u>Pine Hills</u></p> <p>County Staff provided a 20min presentation. Attendees were concerned about the extreme cost of housing for homeowners and renters. People cannot afford to rent homes; people are renting rooms instead. Would also like to see funding for pocket parks, benches, places for residents to enjoy (have to go to Barnett Park). Age affects housing – would like to see older homes upgraded, and market to seniors who are downsizing to attract them to Pine Hills. PHSNC would like to help. One resident says there are too many people in housing, but surplus of smaller homes that need to be renovated and neighborhoods cleaned up -- does not want any more housing. Wants more involvement from more parties to support Pine Hills revitalization. A lot of people walking and proud of recent clean-up efforts. People want to own their homes. Really disappointed in the investors that are buying starter homes and renting out, but not maintaining. A resident suggested a flea market, the current market at the Fair Grounds is closing – want to organize their own flea market – would like to see a flea market/farmers market to create jobs and bring revenue to Pine Hills – would like to see County owned land used for this. Lacks green space that isn't already programmed. Wants to be marketed as a “district” like the “Packing District” and a vision plan with goals for it (housing plan, etc.). Wants to see an investment into a specific area. Very proud of what they see with Emerald Villas investment. Wants to see an investment in the APA Plan for Pine Hills. Work closer with other divisions and use our funds to make those plans a reality. The group wants to stay informed of progress.</p> <p><u>Orlo Vista</u></p> <p>County Staff provided an overview of the Consolidated Plan process and the survey. Attendees described a need for increased economic opportunities in the area and availability of affordable housing and homeownership opportunities in their neighborhood.</p> <p><u>North Lake Mann</u></p> <p>County Staff provided a 20-minute presentation about the 5-year Consolidated Plan process. Attendees expressed interest in seeing a joint effort between Housing & Community Development and Code Enforcement called “Renew”. This program involved canvassing neighborhoods where there were code concerns and providing information regarding housing rehab services. This was a successful program in the past and helped bridge the digital divide, especially for seniors, to learn about programs offered by Orange County. There was also a discussion about the history of racial discrimination of federal funding. An elderly resident described how Black</p>	

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/ attendance	Summary of comments received	Summary of comments not accepted and reasons
				<p>neighborhoods that were low-income did not receive proportionate investments from funding sources intended for low-income communities compared to white low-income neighborhoods. Another resident shared that this community was called the “Black Swamp” due to the flooding in the area and it was redlined for housing. Another resident shared that they were previously denied for OC housing rehab because they live in a flood zone.</p> <p><u>Pine Hills Neighborhood Improvement District Advisory Council</u></p> <p>County Staff provided a short write-up on the Consolidated Planning process for the Pine Hills Neighborhood Improvement District (NID) newsletter (published 5/17/2022). The write-up included a link to the website, surveys, and a comment form. In addition, paper copies of the surveys (in both English and Spanish) were distributed to residents with no access to online platforms. Additionally, staff provided an abbreviated presentation to the PHNID. There were comments from attendees regarding the need for more senior programs, especially with regard to senior housing and food security. One attendee expressed a need for investments in less expensive and attainable housing, including mobile homes.</p> <p><u>Pine Castle</u></p> <p>County Staff provided a short overview of the Consolidated Plan process and distributed surveys. Staff spent 2 hours addressing questions and concerns from the audience. The residents want to request a senior and recreation center for their neighborhood. Additionally, there was a request to build a wall to separate a new affordable housing development from their properties and another request to address flooding and drainage issues in an area near 4 schools, which obstructs safe pedestrian access. A sample application for capital projects and public facilities was emailed to the neighborhood organization’s President.</p> <p><u>Lockhart</u></p> <p>County Staff provided a 10-minute presentation about the 5-year Consolidated Plan process due to time constraints. Attendees expressed the need for additional housing and gave support for the Housing Trust Fund as a tool to increase affordable housing. Attendees also shared a concern for senior food security.</p>	

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/ attendance	Summary of comments received	Summary of comments not accepted and reasons
3	Community Survey	Non-targeted/broad community Non-English Speaking (Spanish)	78 responses	<ul style="list-style-type: none"> 58% of survey respondents rated "Affordable Housing and Fair Housing Opportunities" as the highest priority for Orange County's grant funding, followed by "Infrastructure Improvements" at 19%. Respondents believed energy efficiency upgrades (61%), solar panel installations (45%) and increased transportation options (44%) would most increase sustainability and resiliency in their neighborhoods. Health and mental health services was rated the County's top social service need. Construction of new affordable rental units was rated the County's top housing need. Redevelopment or demolition of blighted properties was rated the County's top economic development need. Homeless facilities were rated the County's top public facility need. Street and road improvements, followed closely by high-speed internet access was rated the County's top public infrastructure need. Homeless prevention was rated the top need of the homeless population in the County. 	Not applicable.
4	Project Website	Non-targeted/broad community	734 pageviews 200 unique users	Not applicable.	Not applicable.
5	Comment Form	Non-targeted/broad community	0 comment submissions	Not applicable.	Not applicable.
6	Internet Outreach	Non-targeted/broad community Non-English Speaking (Spanish)	250 press contacts including local TV and radio, community newspapers, Hispanic media, and ethnic newspapers and publications	Not applicable.	Not applicable.
7	Public Comment Period	Non-targeted/broad community	3 comments received by email	<ul style="list-style-type: none"> The County's Down Payment Assistance Program was instrumental in helping a resident realize the dream of homeownership when she'd previously felt owning her own home was out of reach. A County resident who worked as a nurse for 20 years became disabled and was no longer able to keep up with necessary home repairs. The County's Homeowner Rehabilitation program repaired everything that was broken, from replacing plumbing to fresh exterior paint, to an 	Not applicable.

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/ attendance	Summary of comments received	Summary of comments not accepted and reasons
				<p>updated air conditioner and duct work. This resident credits the program with saving her life.</p> <ul style="list-style-type: none"> Another resident who has lived in their Orange County home for over 20 years expressed gratitude for the renovations they received through the County's Homeowner Rehabilitation program and said they love the work that was done. 	
8	Public Hearing	Non-targeted/broad community	No public comments received	Not applicable.	Not applicable.

NEEDS ASSESSMENT

NA-05 Overview

Needs Assessment Overview

To inform development of priorities and goals over the next five years, this section of the Consolidated Plan discusses housing, community development, and economic development needs in Orange County. It relies on data from the U.S. Census, the 2013-2017 5-Year American Community Survey (ACS), and a special tabulation of ACS data known as Comprehensive Housing Affordability Strategy (CHAS) data that estimates the number of households with one or more housing needs. Local data regarding homelessness and assisted housing is included. Finally, public input gathered through interviews, focus groups, meetings, and the community survey are coupled with data analysis to identify priority needs related to affordable housing, homelessness, assisted housing, community development, and economic development in Orange County.

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

Summary of Housing Needs

As of the 2013-2017 5-Year American Community Survey, the population in Orange County was comprised of 964,335 residents and 323,025 households. Orange County's population and households increased by 22% and 15%, respectively, between 2009 and 2017. More recent 2020 ACS data indicates that the population has further increased to 1,033,938 residents, a growth of 7.2%. 2017 HUD-provided data tables provided below should be considered with the knowledge of this additional population shift.

This growth in population in just one decade is particularly significant as median household income in Orange County increased by just 2% between 2009 and 2017 from an estimated \$50,352 to \$51,586. As of 2019 this has number increased to \$63,461, which is higher than the 2019 median household income in both the Orlando-Kissimmee-Sanford Metropolitan Statistical Area of \$61,876 and the state of Florida of \$59,227.

Table 6 segments households by income and household type, including small families (2-4 members), large families (5 or more members), households with seniors, and households with young children. As shown, 124,845 households in Orange County have low or moderate incomes (under 80% of HUD Adjusted Median Family Income (HAMFI)), and together constitute more than one-third (39%) of all households in the County. Small family households comprise the largest portion (38%) of households with low or moderate incomes. Households with young children and households with an older adult member between the ages of 62 and 74 each account for 19% of Orange County's low or moderate-income households. Approximately half of all households with at least one-person age 75 or older or with young children have low to moderate income.

For many low- and moderate-income households in Orange County, finding and maintaining suitable housing at an affordable cost is a challenge. Tables 7 through 12 identify housing needs by tenure based on Comprehensive Housing Affordability Strategy (CHAS) data. CHAS data is a special tabulation of the U.S. Census Bureau's American Community Survey (ACS) that is largely not available through standard Census products. This special dataset provides counts of the number of households that fit certain combinations of HUD-specified housing needs, HUD-defined income limits (primarily 30, 50, and 80% of HAMFI), and household types of particular interest to planners and policy makers.

To assess affordability and other types of housing needs, HUD defines four housing problems:

1. **Cost burden:** A household has a cost burden if its monthly housing costs (including mortgage payments, property taxes, insurance, and utilities for owners and rent and utilities for renters) exceed 30% of monthly income.
2. **Overcrowding:** A household is overcrowded if there is more than 1 person per room, not including kitchens and bathrooms.
3. **Lack of complete kitchen facilities:** A household lacks complete kitchen facilities if it lacks one or more of the following: cooking facilities, refrigerator, or a sink with piped water.

4. Lack of complete plumbing facilities: A household lacks complete plumbing facilities if it lacks one or more of the following: hot and cold piped water, a flush toilet, or a bathtub or shower.

HUD also defines four severe housing problems, including a severe cost burden (more than 50% of monthly household income is spent on housing costs), severe overcrowding (more than 1.5 people per room, not including kitchens or bathrooms), lack of complete kitchen facilities (as described above), and lack of complete plumbing facilities (as described above).

Table 7 indicates a total of 107,793 households, approximately one-third of all households in Orange County, experience one of the listed housing problems. Data for households experiencing severe housing problems provided in Table 8 show nearly one-fifth of all households (60,661 households) experience one or more severe housing problems listed.

Overall, the most common housing problem in Orange County is cost burdens regardless of tenure type. Over two-thirds (69%) of all households with incomes under 80% HAMFI in the city experience cost burdens. Severe cost burdens affect 19,415 owners and 32,086 renters in total comprising approximately 52% of all cost burdened households in Orange County. For the lowest income households (those with incomes under 30% HAMFI), severe cost burdens are most common, impacting nearly two-thirds (65%) of all households at that income level.

While the primary housing issue facing low- and moderate-income residents are related to affordability, there are other housing needs in the County. Approximately 3% of all households experience overcrowding and 2% of all households have no income. Less than 1% of all households reside in substandard housing or lack complete plumbing and kitchen facilities. Although these percentages are significantly smaller in comparison to households with cost burdens, the total number of households experiencing problems other than cost burdens amounts to 15,122 or about 5% of all households in the Orange County.

The remainder of this section characterizes local housing needs in more detail. The Market Analysis component of the Consolidated Plan identifies resources available to respond to these needs (public housing, tax credit and other subsidized properties, housing and services for the homeless, and others).

Table 5 - Housing Needs Assessment Demographics

Demographics	Base Year: 2009	Most Recent Year: 2017	% Change
Population	792,292	964,335	22%
Households	282,079	323,025	15%
Median Income	\$50,352.00	\$51,586.00	2%

Data Source: 2000 Census (Base Year), 2013-2017 ACS (Most Recent Year)

Number of Households Table

Table 6 - Total Households Table

	0-30% HAMFI	>30-50% HAMFI	>50-80% HAMFI	>80-100% HAMFI	>100% HAMFI
Total Households	35,285	35,835	53,725	33,805	164,390

	0-30% HAMFI	>30-50% HAMFI	>50-80% HAMFI	>80-100% HAMFI	>100% HAMFI
Small Family Households	12,014	13,395	21,979	15,869	90,525
Large Family Households	2,298	4,177	6,139	3,763	13,839
Household contains at least one person 62-74 years of age	5,894	6,458	10,936	6,427	32,702
Household contains at least one person age 75 or older	3,651	4,352	5,666	3,191	10,740
Households with one or more children 6 years old or younger	6,499	7,589	9,798	6,098	21,147
Data Source: 2013-2017 CHAS					

Housing Needs Summary Tables

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

Table 7 – Housing Problems Table

	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	459	395	128	120	1,102	162	58	85	59	364
Severely Overcrowded - With >1.51 people per room (and complete kitchen and plumbing)	450	515	350	218	1,533	55	149	88	75	367
Overcrowded - With 1.01-1.5 people per room (and none of the above problems)	1,109	1,082	1,494	485	4,170	175	303	663	408	1,549
Housing cost burden greater than 50% of income (and none of the above problems)	15,139	12,429	4,163	355	32,086	7,794	5,675	4,784	1,162	19,415
Housing cost burden greater than 30% of income (and none of the above problems)	551	5,648	15,260	6,035	27,494	1,210	3,660	9,564	5,279	19,713
Zero/negative Income (and none of the above problems)	3,303	0	0	0	3,303	2,734	0	0	0	2,734

Data Source: 2013-2017 CHAS

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

Table 8 – Housing Problems 2

	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	17,160	14,414	6,158	1,199	38,931	8,199	6,195	5,625	1,711	21,730
Having none of four housing problems	1,684	7,088	20,465	13,185	42,422	2,224	8,114	21,480	17,749	49,567
Household has negative income, but none of the other housing problems	3,303	0	0	0	3,303	2,734	0	0	0	2,734

Data Source: 2013-2017 CHAS

3. Cost Burden > 30%

Table 9 – 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	6,813	8,620	9,275	24,708	2,873	2,881	5,971	11,725
Large Related	1,627	2,577	1,971	6,175	402	1,080	1,892	3,374
Elderly	2,273	2,180	2,031	6,484	4,300	4,180	4,283	12,763
Other	6,747	6,494	7,121	20,362	1,716	1,478	2,593	5,787
Total need by income	17,460	19,871	20,398	57,729	9,291	9,619	14,739	33,649

Data Source: 2013-2017 CHAS

4. Cost Burden > 50%

Table 10 – 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	6,663	5,375	1,785	13,823	2,567	1,643	1,754	5,964
Large Related	1,577	1,501	219	3,297	344	585	400	1,329
Elderly	2,070	1,543	494	4,107	3,621	2,472	1,706	7,799
Other	6,520	4,730	1,837	13,087	1,498	1,073	990	3,561
Total need by income	16,830	13,149	4,335	34,314	8,030	5,773	4,850	18,653

Data Source: 2013-2017 CHAS

5. Crowding (More than one person per room)

Table 11 – Crowding Information – 1/2

	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	1,504	1,319	1,484	433	4,740	225	379	427	300	1,331
Multiple, unrelated family households	69	223	285	184	761	10	88	339	178	615
Other, non-family households	25	45	65	114	249	4	10	0	0	14
Total need by income	1,598	1,587	1,834	731	5,750	239	477	766	478	1,960

Data Source: 2013-2017 CHAS

Table 12 – Crowding Information – 2/2

	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								

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

Estimates of the number of non-elderly single person households in need of housing assistance are included in the “other, non-family” category of Tables 9 and 10. This category includes multi-person households whose members are unrelated (e.g., roommates, un-married partners, etc.).

There are an estimated 26,149 single-person or multi-person unrelated households with low or moderate incomes who spend more than 30% of their income on housing. Single-person or multi-person unrelated households comprise 29% of all households experiencing cost burdens. Renters comprise over three-quarters (78%) of this subgroup while the remaining 22% are owners.

The number of renter households with low to moderate income experiencing cost burdens is evenly distributed across the three income levels. One-third (33%) of single person households experiencing cost burdens have very low incomes (0-30% HAMFI), 32% have low incomes (>30-50% HAMFI), and 35% have moderate incomes (>50-80% HAMFI). Unlike the income level distribution of renter households, moderate income single-person, owner households comprise the majority (45%) of all owner households with cost burdens. Owner households with very low-income levels represent 30% of single person owner households with cost burdens, similar to the same income group of single person renter households. Moderate-income owner households with cost burdens comprise a smaller share (26%) compared to moderate-income renter households with cost burdens in Orange County.

There are less single-person, non-family households with low to moderate income (16,648) experiencing severe cost burdens in Orange County, however, very low-income households are disproportionately affected by housing costs that exceed 50% of their income. Single person, non-family renters and owners with severe housing cost burdens comprise nearly one-third (31%) of all households with severe housing cost burdens. Nearly half (48%) of single person households experiencing severe cost burdens are households with incomes under 30% HAMFI. The proportion of single person households with severe cost burdens decreases in among low-income households (35%) and moderate-income households (17%).

Single-person, non-family households comprise about 3% of all households experiencing problems with overcrowding. Renters with moderate-income are most affected by overcrowding problems among single-person households in Orange County.

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.

Data gathered from the 2013-2017 ACS estimates 136,167 persons with disabilities residing in Orange County, approximately 11% of the County's total population. There is no data available that shows housing needs of households with disabled persons, however, patterns found among CHAS data on household income and housing problems can be used to estimate the need for housing assistance among the disabled population. Assuming the pattern of low- to moderate-income households experiencing more than one housing problems applies, poverty status data could indicate if persons with disabilities have a greater risk of experiencing housing problems. 2013-2017 ACS estimates 23% of the disabled population fall below the poverty level. Households with incomes below 30% HAMFI comprise 11% of all households in the Orange County; however, households with very low income comprise nearly one-third (31%) of all households experiencing one or more housing problems. This disproportionate representation of very low-income residents would likely indicate increased susceptibility to housing problems for individuals with disabilities. Additionally, persons with disabilities often face greater difficulty

finding appropriate housing, given the scarcity of housing that is both affordable and accessible to people with disabilities.

The Florida Coalition Against Domestic Violence published the 2019-2020 Capital Needs Assessment after surveying the state's certified domestic violence centers. Survey findings show maintenance and repairs to existing emergency shelters and renovation or additional shelters were ranked as the most urgent needs. Survey responses also indicate the need for 314 additional emergency shelter beds and 102 additional transitional housing beds. The needs assessment also indicates the importance of transitional housing programs for domestic violence survivors who are often unable to secure permanent housing because of the scarcity of affordable housing units and long waiting lists for subsidized housing. In 2019, domestic violence centers provided shelter services to 12,492 survivors statewide and assisted 3,524 survivors with identifying and securing affordable housing.

There was a total of 8,168 reported domestic violence offenses in 2019 across Orange County. There is no data available to show the availability of shelter services or types of services provided by domestic violence centers specifically in Orange County. Harbor House of Central Florida is the only state-certified shelter in Orange County and operates a 102-bed emergency shelter that served 1,132 survivors in their last fiscal year.

What are the most common housing problems?

CHAS data indicates the most common housing problems in Orange County, regardless of tenure type, are unaffordable housing costs. Nearly one-third (31%) of all households in Orange County experience housing cost burdens of which 69% are low- to moderate-income households. Low- to moderate-income households comprise nearly 97% of all households experiencing severe housing cost burdens. Almost two-thirds (65%) of all households with incomes under 30% HAMFI experience severe cost burdens. Although the most common housing problems are related to affordability, overcrowding and substandard housing are problems experienced by approximately 3% of all households in Orange County.

In addition to CHAS data on housing cost burdens, housing affordability problems in Orange County are implied by homelessness data published by the Homeless Services Network of Central Florida. The Point-In-Time count in 2019 identified 2,010 people experiencing homelessness in Orange County with approximately 16.7% of the counted individuals considered unsheltered (336 people). The Point-In-Time count conducted in 2020 shows a consistent number of people experiencing homelessness (2,007); however, the number and share of unsheltered individuals rose to 459 or 22.8%. While the CoC's 2021 PIT count did not count unsheltered individuals because of the risk of transmission of COVID-19, it identified 1,544 sheltered individuals, close to the 2020 total of 1,548 sheltered individuals. The 2022 Point-in-Time count noted 2,151 individuals experiencing homelessness, 426 of whom were unsheltered (19.8%). The Orange County Public Schools McKinney Vento program counted 5,634 students experiencing homelessness in the 2021-2022 school year, an 18.8% increase from the 2019-2020 school year. The Coalition for the Homeless of Central Florida calculates there are only 17 affordable rental units available for every 100 low-income households in Central Florida.

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

According to Table 8, renter households are disproportionately affected by severe housing problems compared to owner households. Approximately 46% of all renter households in Orange County experience one or more severe housing problems compared to 29% of owner households. Table 8 also indicates renters with income less than 30% HAMFI comprise 42% of all households experiencing one or more severe housing problems. The proportion increases significantly to 76% when including the number of renter households with incomes under 50% HAMFI. Table 7 shows renter households with very low, low, and moderate incomes comprise 58% of all households experiencing one of the listed housing problems.

Renter households are three times more likely to experience overcrowding compared to owner households. Very low- to moderate-income renter households experience overcrowding at significantly higher rates compared to other income groups regardless of tenure type. Among owner households experiencing one or more problems, moderate-income households are more likely than other income subgroups to be burdened by housing costs that exceed 30% of their income. 97% of all severely cost burdened households are comprised of households with very low to moderate income.

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

According to the 2013-2017 ACS data, 16.7% of residents in Orange County are living at or below poverty level. The majority of the population living at or below poverty level are between the ages of 18 and 64, female, white, and employed. Proportionately, Black (23%), unemployed (37%), children under the age of 18 (23%), and people who have not graduated high school (25%) are more likely to live at or below poverty level. 28% of all families with a female householder with children and no spouse are below poverty level, significantly higher than the proportion of married couple families below poverty (7%).

Low wages, rising rental costs, and the scarcity of affordable housing for low- and extremely low-income households place vulnerable households at even greater risk for eviction or homelessness. Individuals and families at imminent risk and those who have experienced homelessness and are receiving rapid re-housing assistance often face a myriad of barriers including prior histories of homelessness or eviction, chronic physical or mental disabilities, poor credit, criminal histories, and limited access to additional education or job skills training. The greatest need of formerly homeless families and individuals receiving rapid re-housing assistance is the availability of standard housing that is affordable to households at or below 50% AMI.

For formerly homeless families and individuals nearing the termination of assistance, the top needs are for increased, sustainable income (earned and unearned); access to Social Security

disability and other mainstream benefits; linkages to health, mental health, and legal services; access to affordable transportation and childcare; access to transitional and supportive housing programs; and ongoing case management and supportive services.

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:

The Central Florida Commission on Homelessness (CFCH) is responsible for coordinating and implementing a regional homeless response system to meet the needs of persons experiencing or at imminent risk of homelessness. CFCH defines “at-risk of homelessness” as an individual or family who has an annual income below 30 percent of median family income for the area as determined by HUD, does not have sufficient resources or support networks immediately available to prevent them from moving to an emergency shelter, and meets one of the following conditions:

- Has moved because of economic reasons two or more times during the 60 days immediately preceding the application for homelessness prevention assistance;
- Is living in the home of another because of economic hardship;
- Has been notified in writing that their right to occupy their current housing or living situation will be terminated within 21 days after the date of application for assistance;
- Lives in a hotel or motel and the cost of the hotel or motel stay is not paid by charitable organizations or by Federal, State, or local government programs for low-income individuals;
- Lives in a single-room occupancy or efficiency apartment unit in which there reside more than two persons or lives in a larger housing unit in which more than 1.5 persons reside per room, as defined by the U.S. Census Bureau;
- Is exiting a publicly funded institution, or system of care (such as a healthcare facility, a mental health facility, foster care or other youth facility, or correction program or institution);
- Otherwise lives in housing that has characteristics associated with instability and an increased risk of homelessness, as identified in the recipient’s approved consolidated plan.

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

The most fundamental risk factor for homelessness is extreme poverty, leading to unaffordable rents or homeowner costs. Renters with incomes under 30% HAMFI and housing cost burdens over 50% are at risk of homelessness, especially if they experience a destabilizing event such as a job loss, reduction in work hours, or medical emergency/condition. Such factors may also put low-income homeowners at risk of foreclosure and subsequent homelessness.

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

Assess the need of any racial or ethnic group that has disproportionately greater need in comparison to the needs of that category of need as a whole.

Introduction

This section assesses the housing needs of racial and ethnic groups at various income levels in comparison to needs at that income level as a whole to identify any disproportionately greater needs. According to HUD, a disproportionately greater need exists when members of a racial or ethnic group at a given income level experience housing problems at a greater rate (10 percentage points or more) than the income level as a whole. Tables 13 through 16 identify the number of households experiencing one or more of the four housing problems by householder race, ethnicity, and income level. The four housing problems include: (1) cost burdens (paying more than 30% of income for housing costs); (2) overcrowding (more than 1 person per room); (3) lacking complete kitchen facilities; and (4) lacking complete plumbing facilities.

2017 income classifications include:

- Very low income – up to 30% of area median income (AMI) or \$24,600 for a family of four;
- Low income – 30 to 50% AMI or \$24,601 to \$29,200 for a family of four;
- Moderate income – 50 to 80% AMI or \$29,201 to \$46,700 for a family of four; and
- Middle income – 80 to 100% AMI or \$46,701 to \$58,400 for a family of four.

0%-30% of Area Median Income

Over three-quarters (77%) of the 35,272 very low-income households in Orange County experience one or more housing problems.

Table 13 - Disproportionally Greater Need 0 - 30% AMI

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	27,104	2,131	6,037
White	8,611	854	2,521
Black / African American	6,862	480	1,269
Asian	978	118	283
American Indian, Alaska Native	64	4	30
Pacific Islander	0	0	0
Hispanic	9,967	668	1,799

Note: The four housing problems are: (1) Lacks complete kitchen facilities; (2) Lacks complete plumbing facilities; (3) More than one person per room; and (4) Cost burden greater than 30%.

Data Source: 2013-2017 CHAS

Hispanic households make up over one-third (37%) of all households experiencing one or more housing problems. White households make up slightly less than one-third (32%) of very low-income households with one or more housing problems. Black/African American households are the third largest group and account for 25% of very low-income households with housing problems. Asian households comprise just 4% of the very low-income group. The rates of Black/African American (80%) and Hispanic (80%) households experiencing housing problems slightly exceed the jurisdiction as a whole; however, there are no groups that exceed the threshold to indicate disproportionately greater needs.

30%-50% of Area Median Income

Among the 35,809 low-income (30-50% AMI) households in Orange County, 83% of households experience one or more housing problems. Hispanic and white households each represent slightly more than one-third all low-income households with one or more housing problems. Black/African American households represent one-quarter of low-income households with housing problems. Asian households account for a small portion (4%) of low-income households with one or more housing problems. Although 91% of Black/African American households in the low-income household category experience one or more housing problems, the rate does not exceed the threshold of the income subgroup to meet HUD's definition of a disproportionately greater need.

Table 14 - Disproportionally Greater Need 30 - 50% AMI

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	29,899	5,910	0
White	10,051	3,053	0
Black / African American	7,400	768	0
Asian	1,057	302	0
American Indian, Alaska Native	0	0	0
Pacific Islander	0	0	0
Hispanic	10,883	1,649	0

Note: The four housing problems are: (1) Lacks complete kitchen facilities; (2) Lacks complete plumbing facilities; (3) More than one person per room; and (4) Cost burden greater than 30%.

Data Source: 2013-2017 CHAS

50%-80% of Area Median Income

Approximately two-thirds (68%) of moderate-income (50-80% AMI) households in Orange County experience one or more housing problems. Hispanic and white households each comprise 35% of households with one or more housing problems in the moderate-income category. 22% of moderate-income households experiencing housing problems are Black/African American and 4% are Asian. American Indian/Alaska Native and Pacific Islander households each represent less than 1% of moderate-income households with housing problems. Although small in numbers, nearly all American Indian/Alaska Native and Pacific Islander moderate-income households experience one or more housing problems, therefore, each group exceeds the designated threshold indicating a disproportionately greater need.

Table 15 - Disproportionally Greater Need 50 - 80% AMI

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	36,635	17,097	0
White	12,952	7,719	0
Black / African American	8,239	3,382	0
Asian	1,367	926	0
American Indian, Alaska Native	65	14	0
Pacific Islander	15	0	0
Hispanic	12,971	4,655	0

Note: The four housing problems are: (1) Lacks complete kitchen facilities; (2) Lacks complete plumbing facilities; (3) More than one person per room; and (4) Cost burden greater than 30%.

Data Source: 2013-2017 CHAS

80%-100% of Area Median Income

Approximately 42% of the 12,933 middle-income households in Orange County experience one or more housing problems. Departing from the racial and ethnic composition patterns of lower income groups, nearly half (45%) of the households in the middle-income category with one or more housing problems are represented by white households. Hispanic households make up nearly one-third of all middle-income households with problems. Black/African American households comprise 19% of middle-income households with problems. Asian households comprise just 4% of the very low-income group. American Indian/Alaska Native and Pacific Islander households comprise less than 1% of households with one or more housing problems in this income subgroup. There are no racial or ethnic groups that exhibit a disproportionately greater need in the middle-income subgroup.

Table 16 - Disproportionally Greater Need 80 - 100% AMI

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	14,210	19,599	0
White	6,362	8,289	0
Black / African American	2,711	3,966	0
Asian	493	711	0
American Indian, Alaska Native	0	20	0
Pacific Islander	0	90	0
Hispanic	4,505	6,158	0

Note: The four housing problems are: (1) Lacks complete kitchen facilities; (2) Lacks complete plumbing facilities; (3) More than one person per room; and (4) Cost burden greater than 30%.

Data Source: 2013-2017 CHAS

Discussion

Overall, while housing problems are most common in households in the lower income groups in Orange County, there are only a few indications of disproportionately greater needs when comparing subpopulations across income, race, and ethnicity. Hispanic and white households each comprise around one-third of all households with one or more housing problems across all income groups in Orange County. Shares of Black and Asian households with housing problems are also similar across income levels. Disproportionately greater needs were only identified among American Indian/Alaska Native and Pacific Islander households at the moderate-income level (50-80% AMI). Although there are very few moderate-income American Indian/Alaska Native and Pacific Islander households, the shares of households with housing problems for each group exceed the HUD-defined threshold indicating disproportionately greater need.

No disproportionately greater need was identified for any racial or ethnic subgroup in any other income group. Although the proportion of low-income Black/African American households with one or more housing problems is the highest among any group, it did not exceed the threshold to indicate a disproportionately greater need.

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

Assess the need of any racial or ethnic group that has disproportionately greater need in comparison to the needs of that category of need as a whole.

Introduction

This section assesses the severe housing needs of racial and ethnic groups at various income levels in comparison to severe needs at that income level as a whole to identify any disproportionately greater needs. Like the preceding analysis, this section uses HUD's definition of disproportionately greater need, which occurs when one racial or ethnic group at a given income level experiences housing problems at a rate that is at least 10 percentage points greater than the income level as a whole.

Tables 17 through 20 identify the number of households with one or more of the severe housing needs by householder race and ethnicity. The four severe housing problems include: (1) severe cost burden (paying more than 50% of income for housing and utilities); (2) severe crowding (more than 1.5 people per room); (3) lack of complete kitchen facilities; and (4) lack of complete plumbing facilities.

2017 income classifications include:

- Very low income – up to 30% of area median income (AMI) or \$24,600 for a family of four;
- Low income – 30 to 50% AMI or \$24,601 to \$29,200 for a family of four;
- Moderate income – 50 to 80% AMI or \$29,201 to \$46,700 for a family of four; and
- Middle income – 80 to 100% AMI or \$46,701 to \$58,400 for a family of four.

0%-30% of Area Median Income

Out of a total of 35,304 very low-income households, 72% of households in Orange County have one or more severe housing problems.

Table 17 – Severe Housing Problems 0 - 30% AMI

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	25,359	3,908	6,037
White	7,975	1,491	2,521
Black / African American	6,462	881	1,269
Asian	908	181	283
American Indian, Alaska Native	64	4	30
Pacific Islander	0	0	0
Hispanic	9,337	1,309	1,799

Note: The four housing problems are: (1) Lacks complete kitchen facilities; (2) Lacks complete plumbing facilities; (3) More than one person per room; and (4) Cost burden greater than 30%.

Data Source: 2013-2017 CHAS

Hispanic households comprise 37% of households in this income category with one or more severe housing problems. White households, the second largest racial or ethnic group with one or more severe housing problems in this income category, comprise 31% while 25% is represented by Black/African American households. Asian, American and Pacific Islander households with severe housing problems comprise 4% of the total number of households with severe housing problems. There are no racial or ethnic groups that exhibit a disproportionately greater need in the very low-income subgroup.

30%-50% of Area Median Income

More than half (58%) of the 35,811 low-income households in Orange County experience severe housing problems. Hispanic and white households in this income category with one or more severe housing problems are proportionally similar representing 36% and 35%, respectively. 25% of low-income households with severe housing problems are Black/African American. Asian households experiencing severe housing problems comprise approximately 2% of this low-income group. Similar proportions of households with severe housing problems across all racial and ethnic groups indicate there is no disproportionately greater need among low-income households.

Table 18 – Severe Housing Problems 30 - 50% AMI

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	20,609	15,202	0
White	7,135	5,976	0
Black / African American	5,090	3,088	0
Asian	511	837	0
American Indian, Alaska Native	0	0	0
Pacific Islander	0	0	0
Hispanic	7,415	5,102	0

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
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Note: The four housing problems are: (1) Lacks complete kitchen facilities; (2) Lacks complete plumbing facilities; (3) More than one person per room; and (4) Cost burden greater than 30%.

Data Source: 2013-2017 CHAS

50%-80% of Area Median Income

Less than one-quarter (22%) of the 53,728 moderate-income households in Orange County experience severe housing problems. Moderate-income white households comprise approximately 37% of households experiencing one or more severe housing problems. Hispanic households comprise 33% and Black/African American households comprise 23% of all households with severe housing problems. Similar to other income groups, Asian households comprise 4% of all moderate-income households with severe housing problems. 32% of American Indian/Alaska Native and all Pacific Islander households experience severe housing needs, which exceeds the threshold to indicate disproportionately greater need.

Table 19 – Severe Housing Problems 50 - 80% AMI

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	11,783	41,945	0
White	4,370	16,308	0
Black / African American	2,713	8,898	0
Asian	472	1,808	0
American Indian, Alaska Native	25	54	0
Pacific Islander	15	0	0
Hispanic	3,848	13,805	0

Note: The four housing problems are: (1) Lacks complete kitchen facilities; (2) Lacks complete plumbing facilities; (3) More than one person per room; and (4) Cost burden greater than 30%.

Data Source: 2013-2017 CHAS

80%-100% of Area Median Income

Among the middle-income group, only 9% of all households experience severe housing problems. The majority of households in this income category with one or more severe housing problems are white (43%); 28% are white; and 22% are Black/African American. Asian households with severe housing problems represent 4% of all households with severe housing problems. All represented subgroups with middle incomes experience one or more housing problems at a rate close to the overall subgroup. This indicates there is no disproportionately greater need.

Table 20 – Severe Housing Problems 80 - 100% AMI

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	2,910	30,934	0
White	1,265	13,374	0
Black / African American	637	6,045	0
Asian	104	1,116	0
American Indian, Alaska Native	0	20	0
Pacific Islander	0	90	0
Hispanic	821	9,843	0

Note: The four housing problems are: (1) Lacks complete kitchen facilities; (2) Lacks complete plumbing facilities; (3) More than one person per room; and (4) Cost burden greater than 30%.

Data Source: 2013-2017 CHAS

Discussion

American Indian/Alaska Native and Pacific Islander households with moderate-income are the only groups that disproportionately experience severe housing burdens. American Indian/Alaska Native and Pacific Islander households comprise a very small fraction of Orange County's households with just 302 combined households. Hispanic and white households maintain the largest representation across very-low to moderate-income levels each comprising around one-third of all households with one or more severe housing problems. Black and Asian households with severe housing problems maintain consistent representation across all income levels. With the exception of moderate-income American Indian/Alaska Native and Pacific Islander households, there is no indication of disproportionately greater need among other racial and ethnic groups across all income levels.

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

Assess the need of any racial or ethnic group that has disproportionately greater need in comparison to the needs of that category of need as a whole.

Introduction:

This section assesses the need of any racial or ethnic group that has disproportionately greater need in comparison to the needs of that category of need as a whole. While the preceding sections assessed all housing and severe housing problems, Table 21 focuses only on what share of their income households spend on housing. Data is broken down into groups spending less than 30% of income on housing costs, those paying between 30 and 50% (i.e., with a cost burden), and those paying over 50% (i.e., with a severe cost burden). The final column, “no/negative income,” identifies households without an income, for whom housing as a share of income was not calculated.

Housing Cost Burden

Table 21 – Greater Need: Housing Cost Burdens AMI

Housing Cost Burden	<=30%	30-50%	>50%	No / negative income (not computed)
Jurisdiction as a whole	196,467	64,149	56,223	6,238
White	107,968	25,993	20,713	2,561
Black / African American	28,248	12,788	13,246	1,378
Asian	9,473	2,566	1,884	288
American Indian, Alaska Native	149	130	49	30
Pacific Islander	105	0	55	0
Hispanic	45,628	21,326	18,923	1,824

Note: The four housing problems are: (1) Lacks complete kitchen facilities; (2) Lacks complete plumbing facilities; (3) More than one person per room; and (4) Cost burden greater than 30%.

Data Source: 2013-2017 CHAS

Discussion:

Table 21 shows that 37% of all households in Orange County experience housing cost burdens. Hispanic households comprise one-third of all cost burdened households in the County and nearly half (46%) of all Hispanic households experience cost burdens. Approximately 30% of white households experience cost burdens and comprise 39% of all cost burdened households in Orange County. Cost burdened Black/African American households comprise 22% of all cost burdened households in the County; however, 47% of Black/African American households experience cost burdens. Asian households represent 4% of all cost burdened households and is proportionally smaller than the overall share of Orange County households with cost burdens. Shares of American Indian/Alaska Native and Pacific Islander households with cost burdens comprise just a small fraction of all cost burdened households, but American Indian/Alaska

Native households experience cost burdens at the highest rate compared to other groups and Orange County as a whole. Examining Orange County's housing cost burden data by race and ethnicity shows disproportionately greater need among Black/African American and American Indian/Alaska Native households.

Among all households in Orange County, 20% are cost burdened by spending between 30% and 50% of their income on housing costs. 17% of all households in Orange County have housing costs that exceed 50% of household income and are considered severely cost burdened. Racial and ethnic composition of households are similar for cost burdened and severely cost burdened households in Orange County. White households comprise 41% of all cost burdened households spending between 30 and 50% of income on housing. The proportion of white households decreases to 37% among households paying more than 50% of their income. Hispanic households make up the second largest group of households (33%) spending 30-50% of income on housing costs. The share of Hispanic households increases slightly to represent 34% of households with severe cost burdens. Black/African American households represent a larger share of households with severe cost burdens (24%) compared to the share of Black/African American households that pay between 30 and 50% of income on housing (20%). Asian households represent nearly the same proportion of households experiencing cost burdens (4%) and severe cost burdens (3%). American Indian and Pacific Islanders each comprise less than 1% among both cost burdened and severely cost burdened households in Orange County.

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?

CHAS data indicates two racial and ethnic groups have disproportionately greater needs relative to the needs of an entire income category. American Indian/Alaska Native and Pacific Islander groups exhibit disproportionately greater needs among moderate-income households in Orange County.

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

Input collected during the community engagement process identified housing affordability for low- and moderate-income households as a high priority housing need in Orange County. Community members also discussed a need for senior housing, energy efficiency/rehab programs, and permanent supportive housing in the County.

In addition to housing needs, stakeholders identified the following needs experienced by low- and moderate-income households in Orange County: high speed internet and computers, affordable childcare, access to affordable transportation options, domestic violence services, mental health services, and access to parks and community centers.

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

There are no visible patterns to determine if there are residential patterns or clusters among the small population of American Indian residents. The residential concentrations of these racial or ethnic groups appear to follow general residential density patterns throughout the County.

NA-35 Public Housing – 91.205(b)

Introduction

Publicly supported housing options in Orange County are provided by the Orange County Housing and Community Development Division, the Winter Park Housing Authority, and the Orlando Housing Authority. HUD PIC data indicates that Orange County, including the City of Orlando, provides 1,616 public housing units and 4,488 housing choice vouchers for low-to-moderate income residents. Looking further at housing choice vouchers, approximately 4,191 are tenant-based vouchers, 67 are offered through the Family Unification Program, and 34 are Disabled vouchers.

Local housing authority plans indicate slightly different numbers on available publicly supported housing units. According to its 2021 Annual Plan, the Orange County Housing and Community Development (HCD) Division offers 1,263 Section 8 housing choice vouchers. The Winter Park Housing Authority's FY 2020 Annual Plan reports that it has 171 public housing units. In addition to its public housing supply, the WPHA also has four affordable housing projects. The Orlando Housing Authority reports having 1,409 public housing units and 4,553 HCV units, including 619 VASH vouchers, in both Orlando and Orange County.

Looking at demographic data of all housing authority residents in Orange County, approximately 1,268 residents are aged 62 or older. Residents with disabilities number around 1,789 - 29% of all residents. More than half (57%) of all publicly supported housing residents are Black; another 40% are white, and 3% are Asian or Pacific Islander. Nearly two-thirds (38%) of all residents are Hispanic. These demographics indicate that publicly supported housing remains an important housing resource for minority, elderly, and disabled residents in Orange County.

Totals in Use

Table 22 - Public Housing by Program Type

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 with vouchers in use	0	96	1,616	4,488	0	4,191	194	67	34

Data Source: PIC (PIH Information Center)

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

Characteristics of Residents

Table 23 – Characteristics of Public Housing Residents by Program Type

Program Type								
	Certificate	Mod-Rehab	Public Housing	Vouchers				
				Total	Project - based	Tenant - based	Special Purpose Voucher	
							Veterans Affairs Supportive Housing	Family Unification Program
# Homeless at admission	0	6	24	0	0	0	0	0
# of Elderly Program Participants (>62)	0	26	443	799	0	758	24	1
# of Disabled Families	0	64	413	1,312	0	1,162	118	13
# of Families requesting accessibility features	0	96	1,616	4,488	0	4,191	194	67
# of HIV/AIDS program participants	0	0	0	0	0	0	0	0
# of DV victims	0	0	0	0	0	0	0	0

Data Source: PIC (PIH Information Center)

Race of Residents

Table 24 – Race of Public Housing Residents by Program Type

Race	Certificate	Mod-Rehab	Public Housing	Program Type					
				Vouchers					
				Total	Project - based	Tenant - based	Special Purpose Voucher		
							Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
White	0	24	507	1,936	0	1,846	58	14	18
Black/African American	0	70	1,026	2,431	0	2,261	102	51	15
Asian	0	1	17	15	0	15	0	0	0
American Indian/Alaska Native	0	1	2	2	0	2	0	0	0
Pacific Islander	0	0	64	104	0	67	34	2	1
Other	0	0	0	0	0	0	0	0	0

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

Data Source: PIC (PIH Information Center)

Ethnicity of Residents

Table 25 – Ethnicity of Public Housing Residents by Program Type

Ethnicity	Certificate	Mod-Rehab	Public Housing	Program Type					
				Vouchers					
				Total	Project - based	Tenant - based	Special Purpose Voucher		
							Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
Hispanic	0	14	513	1,837	0	1,767	40	15	15
Not Hispanic	0	82	1,103	2,651	0	2,424	154	52	19

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

Data Source: PIC (PIH Information Center)

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

According to 2021 estimates from A Picture of Subsidized Households (APSH), 19% of all persons in the Winter Park Housing Authority have a disability. Internal data from the Orlando Housing Authority indicates that 55% of its public housing residents and voucher participants have a disability. APSH data was not available for persons receiving Section 8 vouchers through the Orange County Housing and Community Development Division.

The FY 2020 WPHA Annual Plan indicates that 1,150 Winter Park families with a disability have a housing need.¹ Compared to other family types, including low-to-moderate income households, elderly households and households by racial/ethnic group, families with disabilities have the highest rate of housing need. The greatest ranking housing need for families with disabilities was accessibility, followed by supply, quality, size and location. At the time of the plan, the WPHA stated that it had 10 families with disabilities on its waiting list. The Orlando Housing Authority reports that the current needs of its disabled residents include wheelchair accessible units, walk-in showers, ramps, handicap toilets, handrails, wide doors, accessible parking, accessible storage areas in units, lower cabinets, lower countertops, and one-story units.

Affordability may also be a critical need for households on limited incomes, particularly those earning no more than \$771/month in SSI benefits. For these households, there are few independent living options other than housing provided by the local housing authorities.

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

Current public housing residents and HCV holders are most immediately in need of opportunities and supports to attain a level of financial stability and develop personal and professional skills. These supports include resources in areas such as job training and assistance, food, childcare, transportation, health, and mental health-related assistance, afterschool programs, adult education, credit repair and financial management.

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

The needs of public housing residents and voucher holders are different from those of the County's overall low- and moderate-income population primarily in that these residents are housed in stable and decent housing. With this need met, residents can work on other needs that families typically face in addition to housing insecurity. These other needs frequently include childcare, healthcare, employment, transportation, and food.

¹ Winter Park Housing Authority. "FY 2020 Agency Plan Annual Update." p. 10

NA-40 Homeless Needs Assessment – 91.205(c)

Introduction:

This section discusses the size and characteristics of the population experiencing homelessness in Orange County. The Central Florida Commission on Homelessness serves as the organizing entity for the Continuum of Care (CoC) for Orange, Osceola, and Seminole counties. Each year, the Commission directs a Point-in-Time (PIT) count of people experiencing homelessness throughout the region on one night in January. The table below shares results of the PIT count for the Continuum of Care area, which identified a total of 2,151 unhoused individuals and 1,518 households in 2022. While the CoC's 2021 PIT count did not count unsheltered individuals because of the risk of transmission of COVID-19, it identified 1,544 sheltered individuals, fewer than the 2022 total of 1,725 sheltered individuals.

Table 26 – 2022 Point-in-Time Count for the Orlando/Orange, Osceola, Seminole Counties CoC

	Sheltered		Unsheltered	Total
	Emergency	Transitional		
Total number of households	770	354	394	1,518
Total number of persons	1,233	492	426	2,151
Number of children (under age 18)	421	128	1	550
Number of persons age 18 to 24	84	30	11	125
Number of persons over age 24	728	334	414	1,476

Data Source: 2022 Point-in-Time Count, FL-507 Orlando/Orange, Osceola, Seminole Counties CoC

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):

Of the 2,151 people experiencing homelessness counted in the 2022 PIT count, 403 were chronically homeless (18.7%). Of those 403, most were in emergency shelter (307) and the remainder (96) were unsheltered (see Table 28).

The 2022 PIT count identified 858 people in households with at least one adult and one child (267 households and 39.9% of all people experiencing homelessness). 549 of these people were children under age 18, 46 were aged 18 to 24, and 263 were adults over age 24. 186 of the households were in emergency shelter, 81 were in transitional housing, and no households were unsheltered.

While data regarding veteran status was unavailable for the 2022 PIT count, 190 unhoused veterans were counted during the 2020 count. Their housing statuses varied, with 56 in emergency shelter, 85 in transitional housing, and 49 unsheltered. The count did not specify

whether veterans were in families with children. Data was not available regarding the number of persons becoming homeless or exiting homelessness each year, or the average number of days that persons experience homelessness.

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

As mentioned above, the PIT count identified 267 households experiencing homelessness with at least one adult and one child, which included a total of 858 people (549 children and 309 adults). All but six of these households were sheltered, either in emergency shelter or transitional housing. One unsheltered unaccompanied youth under the age of 18 was counted. Of the 190 veterans counted in the 2020 PIT count, 141 were sheltered, and 49 were unsheltered. The count did not specify whether veterans were in families with children.

Table 27 – 2022 Point in Time Count: Persons in Households with at Least One Adult and One Child

	Sheltered		Unsheltered	Total
	Emergency	Transitional		
Total number of households	186	81	0	267
Total number of persons	639	219	0	858
Number of children (under age 18)	421	128	0	549
Number of persons age 18 to 24	35	11	0	46
Number of persons over age 24	183	80	0	263

Data Source: 2022 Point-in-Time Count, FL-507 Orlando/Orange, Osceola, Seminole Counties CoC

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

The PIT count also categorized the number of people experiencing homelessness in the three counties by race and ethnicity (shown in the table that follows). The count found that the vast majority of individuals were Black (52.4%) or white (41.3%). Of these, white people were more likely to be unsheltered (31.4%) than Black people (15.4%). Regarding ethnicity, the count identified 344 Hispanic or Latino people (17.1% of people experiencing homelessness), and 1,663 people who are not Hispanic or Latino.

Table 28 – 2022 Point in Time Count: Race and Ethnicity of Persons Experiencing Homelessness

Homelessness

	Sheltered		Unsheltered	Total
	Emergency	Transitional		
Homeless Persons by Race				
White	462	239	277	978
Black or African American	677	231	116	1,024
Asian	7	4	3	14
American Indian or Alaska Native	2	0	13	15
Native Hawaiian or Pacific Islander	6	0	7	13
Multiple Races	79	18	10	107
Homeless Persons by Ethnicity				
Non-Hispanic/Non-Latino	964	369	351	1,684
Hispanic/Latino	269	123	75	467

Data Source: 2022 Point-in-Time Count, FL-507 Orlando/Orange, Osceola, Seminole Counties CoC

Describe the Nature and Extent of Unsheltered and Sheltered Homelessness.

The 2022 PIT count noted a total of 2,151 people experiencing homelessness, including 1,725 sheltered (80.2%) and 426 unsheltered (19.8%) people. Of the sheltered individuals, 1,233 were in emergency shelter (71.5%) and the remaining 492 were in transitional housing (28.5%). Of the 505 individuals counted under the age of 25, 12 were unsheltered (2.4%).

Discussion:

Data from the PIT count indicates a high level of need for housing and services for people experiencing homelessness in the region. Community input received during the development of this Plan also supports the need for resources for people experiencing homelessness in Orange County. Focus group participants noted several priority homeless needs in Orange County, including:

- Affordable housing
- Mental health services
- Healthcare services
- Job training and connections to jobs
- Addressing barriers to employment, including transportation and childcare
- Financial literacy programs
- Addressing root causes of homelessness
- Substance abuse programs
- Single-room occupancy housing

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

Introduction:

This section discusses the characteristics and needs of people in various subpopulations in Orange County who may require supportive services, including people with HIV/AIDS, seniors, people with disabilities (mental, physical, or developmental), people with alcohol or drug addiction, and survivors of domestic violence.

Describe the characteristics of special needs populations in your community:

Elderly and Frail Elderly

According to 2016-2020 American Community Survey estimates, about 12.4% of Orange County's population (outside of the city of Orlando) is elderly (aged 65 and over) and about 4.9% of the population is considered frail elderly (aged 75 and over). About 35.4% of individuals aged 65 and over have one or more disabilities (from ACS tables S0101 and S1810).

People with Disabilities

According to 2016-2020 American Community Survey estimates, about 11.7% of Orange County residents (outside of the city of Orlando) have one or more disabilities. Most common are ambulatory and cognitive difficulties, which impact 5.5% and 4.7% of the population, respectively. Hearing, vision, independent living, and self-care difficulties are less common, impacting about 2-4% of the population.

People with HIV/AIDS and Their Families

According to AIDSVu, an interactive mapping tool from Emory University's Rollins School of Public Health, an estimated 757 out of every 100,000 people in Orange County were living with HIV as of 2019. Further, 40 out of every 100,000 people living in the County were newly diagnosed with HIV in 2019.

People with Alcohol or Drug Addiction

The Central Florida region that includes Orange and Osceola counties had an estimated 4.2% rate of alcohol use disorder in the past year for individuals age 12 and older, according to 2016-2018 data from the U.S. Substance Abuse & Mental Health Data Archive (SAMHDA). In the past year, 2.0% of the region's population is estimated to have used cocaine and 0.3% to have used heroin, per the 2016-2018 data.

Survivors of Domestic Violence

In 2020, 106,515 crimes of domestic violence were reported to Florida law enforcement agencies resulting in 63,217 arrests. Applying these figures to the Orange County population (outside of

the city of Orlando), about 5,550 people in Orange County reported domestic violence in 2020.²

The Centers for Disease Control estimates that about 6.2% of women and 5.1% of men in Florida have experienced any contact sexual violence, physical violence, or stalking by an intimate partner in the past 12 months, according to its National Intimate Partner and Sexual Violence Survey State Report released in 2017. Applying these figures to the Orange County population (outside of the city of Orlando), about 69,585 women and 57,329 men in Orange County have experienced any intimate partner violence in the past 12 months.

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

The primary housing and supportive service needs of these subpopulations (the elderly, persons with disabilities, persons with HIV/AIDS and their families, persons with alcohol or drug addiction, survivors of domestic violence, and reentry populations) were determined by input from housing and service providers and the public through public meetings and stakeholder interviews, as well as through a review of research on housing and service needs of specific populations.

Housing that is Affordable, Accessible, Safe, and Low-Barrier

Residents with special needs often live at or below the federal poverty level. High housing costs make it difficult for these populations to afford housing. Low incomes force many residents to live in congregate care, have roommates, or live with family. HUD's fair market rent documentation for FY 2022 estimates fair market rent for a two-bedroom unit in Orange County at \$1,422 per month, and for a three-bedroom unit at \$1,827 per month.

There is a need to increase the availability of affordable housing for populations with special needs. This could include options such as smaller housing units; multifamily missing middle housing, including duplexes, triplexes, quadraplexes, and other small multifamily units; accessory dwelling units; cohousing with shared services; and other housing types that support increased levels of affordability.

Housing may be inaccessible to populations with special needs for a variety of reasons. Persons with disabilities may find that their housing options are not ADA compliant or are outside the service range for public transportation. People living with HIV/AIDS, immigrants and refugees, people with criminal histories, and other populations with special needs are often discriminated against in housing application processes. People living with HIV/AIDS have a particular need for low-barrier housing that is free from requirements surrounding drug testing, sobriety, criminal background, and medical appointments. For these reasons, there is a need to ensure that accessible, low-barrier housing is available and to take actions to reduce discrimination, such as providing fair housing services.

² Florida Department of Children and Families. (2020). Retrieved from: <https://www.myflfamilies.com/service-programs/domestic-violence/statistics.shtml>

The elderly, people with disabilities, and others who may not have access to vehicles, often need housing that is accessible to transportation, recreation, and employment. These populations need housing options that are integrated into the community to provide access to needed services and to reduce social isolation. Like other populations with special needs, people living with HIV/AIDS also need housing that provides easy access to health services, resources, and employment.

Housing that is safe and clean is another need for people with special needs. Units that are not clean or have other unhealthy conditions can worsen health issues for people who are already vulnerable.

Transportation

Access to transportation is an important concern for people with special needs. People with disabilities and others who may not have access to vehicles need housing close to transportation services to access employment, health services, and recreation opportunities. Persons with HIV/AIDS need housing nearby transportation services to access health services and other resources. If transit is not within walking distance, special needs populations require accessible, reliable transportation services to provide access to everyday needs. Stakeholders noted a need for improved transit reliability and better facilities at transit stops (i.e, benches or bus shelters). Some participants also identified transportation assistance as a key need for seniors in Orange County.

Specialized Housing and Services

Specialized housing addresses needs of specific populations. People with physical, intellectual, or developmental disabilities; people living with HIV/AIDS; and people with alcohol or drug addiction have specific housing needs that may be addressed through housing with wraparound services, such as case management, life skills programming, and health services. The Housing First model emphasizes that supportive services should not be required for people to access housing. Case management was a key need identified by stakeholders related to reducing or preventing homelessness for many subpopulations.

Workforce Development and Employment Services

Special needs populations may also need workforce development and employment services. These programs may include employment navigation, job training, education, transportation services, and case management focused on employment, among others.

Physical and Mental Healthcare Access

Access to healthcare is a need for special needs populations, as they are more likely to experience barriers such as economic disadvantage; medical issues and disability; language and literacy; age; and cultural, geographic, or social isolation. To increase access to healthcare, it is important for local governments and stakeholders to take steps to define, locate, and reach at-risk populations.

Education and Combating Perceptions

Combating stigmas is an important concern for people with special needs. For adults with criminal histories and people living with HIV/AIDS, discrimination may make accessing adequate housing difficult. Further, a lack of understanding regarding the transmission of HIV may cause people to lose housing or employment, thus increasing risk of homelessness.

Outreach

Outreach to special needs populations to ensure they are aware of available services is another need. Clarity in marketing and in public buildings about what services are available is important in supporting awareness of available services among vulnerable populations. Outreach also includes the development of relationships and trust so that people feel comfortable seeking out needed services.

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

According to AIDSVu, an interactive mapping tool from Emory University's Rollins School of Public Health, an estimated 757 out of every 100,000 people in Orange County were living with HIV as of 2019. Further, 40 out of every 100,000 people living in the County were newly diagnosed with HIV in 2019.

NA-50 Non-Housing Community Development Needs – 91.215 (f)

Describe the jurisdiction's need for Public Facilities:

Buildings open to the general public or for use by target special needs populations, whether owned by the government or by nonprofit organizations, may be considered public facilities under the CDBG program. Residents and stakeholders who participated in focus groups detailed public facility needs in the County, including:

- Parks and greenspace
- Business incubators
- Computer labs connected to housing for seniors and people with disabilities
- ADA accessibility features for residents with disabilities
- Libraries with Wi-Fi and computer access
- Community centers located in areas of need, with access to Wi-Fi and computers
- Larger gathering spaces and classrooms
- Improvements to community centers, including benches, picnic tables, indoor and outdoor seating, public restrooms with pull cords for assistance, ADA accessibility features
- Solar and natural gas generators for community centers
- Urban farming and community gardens
- Energy gardens

How were these needs determined?

Orange County's public facility needs were determined based on input from residents and stakeholders engaged through focus groups (see Table 2 for a list of participating organizations).

Describe the jurisdiction's need for Public Improvements:

Residents and stakeholders who participated in community meetings and interviews noted the need for improving:

- Pedestrian and bicycle safety
- Improving walkability
- Access to broadband internet
- Climate resiliency of infrastructure and buildings
- Sewer services
- Access to mass transit
- Roads
- Lighting
- Stability of infrastructure, including above-ground power lines
- Stormwater management and green infrastructure
- Tree canopy
- Cleaning and greening vacant lots

- Greenspace around community centers
- Device charging stations with wi-fi hotspots

How were these needs determined?

Orange County's public improvement needs were determined based on input from residents and stakeholders engaged through focus groups (see Table 2 for a list of participating organizations).

Describe the jurisdiction's need for Public Services:

Public services are an important component of the City's community development strategy, and the County can spend up to 15% of its annual CDBG funding on public services over the next five years. Public service needs identified by meeting attendees and focus group participants include:

- Education about resources available
- Supportive services
- Addressing food deserts
- Mental health services
- Improving access to healthcare
- Financial literacy programs
- Connecting residents to job and internship opportunities
- Job training programs
- Mentorship for starting and running small businesses
- Connecting investors to residents with ideas for small businesses
- Entrepreneurship programs targeting low-income zip codes
- Transportation services
- Childcare
- Support for childcare businesses, including incentives, training, and internships
- Wrap-around services
- Addressing education and language barriers to employment
- Mental health services for people experiencing homelessness
- Assistance with first month's rent or security deposit
- Improving access to housing
- Youth programming at community centers
- Mobile assistance for vulnerable households, including fresh food and services
- Events to connect residents available to resources
- Programs to expand homeownership

How were these needs determined?

Orange County's public service needs were determined based on input from residents and stakeholders engaged through focus groups (see Table 2 for a list of participating organizations).

HOUSING MARKET ANALYSIS

MA-05 Overview

Housing Market Analysis Overview:

Housing choices are limited by household income and wealth; however, a lack of affordable housing in an area may also create significant hardships for low- and moderate-income households. Households that spend more than 30% of their income on housing are considered 'housing cost burdened' and may have difficulty affording other necessities, such as food, clothing, and childcare. Data examined in the following sections shows that there is a lack of rental and for-sale housing in the County that is affordable to residents with very low incomes, and a significant proportion of households are cost-burdened or severely cost-burdened by housing costs. Stakeholders and residents who participated in this planning process also noted a need for development of new housing units affordable to residents with incomes below 50% AMI. In addition to reviewing current housing market conditions, this section analyzes the availability of assisted and public housing and facilities to serve homeless individuals and families. It also analyzes local economic conditions and summarizes existing economic development resources and programs that may be used to address community and economic development needs identified in the Needs Assessment.

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

Introduction

According to the 2013-2017 Five Year American Community Survey, there are 368,508 housing units in Orange County. Of these units the great majority are single unit detached structures, which comprise more of Orange County's housing units than all other unit types combined at 63% of total units. The second most common type of housing is 5-19 unit multifamily structures, comprising 13% of the County's housing units. Each other unit type individually accounts for fewer than 10% of all units, including 20+ unit structures (9%), single unit attached (6%), mobile home/RV/van units (5%), and duplexes/triplexes/quadplexes (4%).

Of occupied housing units in Orange County, 60% are owner-occupied while 40% are renter-occupied. Renters account for almost all occupants of studio or other zero-bedroom units, and rental units overall tend to be smaller than owner-occupied units. 88% of owner-occupied units contain three or more bedrooms, in comparison to 43% of renter-occupied units. Conversely, only 12% of owners live in units with two or fewer bedrooms, while 57% of renters live in such units. Overall, there are more homeowners living in 3+ bedroom units in Orange County than the entire number of renters in the County.

All residential properties by number of units

Table 29 – Residential Properties by Unit Number

Property Type	Number	%
1-unit detached structure	232,910	63%
1-unit, attached structure	20,869	6%
2-4 units	16,376	4%
5-19 units	46,163	13%
20 or more units	32,630	9%
Mobile Home, boat, RV, van, etc	19,560	5%
<i>Total</i>	<i>368,508</i>	<i>100%</i>

Data Source: 2013-2017 ACS

Unit Size by Tenure

Table 30 – Unit Size by Tenure

	Owners		Renters	
	Number	%	Number	%
No bedroom	469	0%	4,034	3%
1 bedroom	1,805	1%	22,785	18%
2 bedrooms	21,159	11%	46,650	36%
3 or more bedrooms	169,988	88%	56,120	43%
<i>Total</i>	<i>193,421</i>	<i>100%</i>	<i>129,589</i>	<i>100%</i>

Data Source: 2013-2017 ACS

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

HUD Assisted Housing Data³ shows that, as of 2021, Orange County had a total of 8,667 subsidized units available. However, this data includes the City of Orlando, which receives separate HUD funding and is not covered by this Consolidated Plan. As of September 2021, Orange County managed a total of 1,263 Housing Choice Vouchers, with 95% of units available for such vouchers occupied. The Orange County Government website's rental assistance page, as of the drafting of this plan, only lists 6 available housing units participating in the Housing Choice Voucher Program⁴. Additionally, the site notes that Orange County is not currently accepting applications for either the Housing Choice Voucher Program or the Tenant Based Rental Assistance program.

Orange County also currently offers short term Covid-19 related Emergency Rental Assistance; however, this assistance only applies to residents who already have housing and are behind on rent. It also excludes residents of the City of Orlando as the city received separate emergency Covid relief funding. While this assistance is vital to lower income residents who are struggling due to the pandemic, it is ineffective in helping unhoused or transitioning residents to acquire affordable housing.

The HUD LIHTC database indicates that there are 127 LIHTC developments in Orange County containing a total of 25,594 units. Of these units, 22,614 are dedicated low-income units. The vast majority of these developments exist within the City of Orlando; there are only 12 developments with a total of 2,194 units that exist within Orange County but outside of Orlando city limits. As of 2018, CHAS data showed that there were 32,430 rental households in Orange County with incomes below 30% HAMFI, and another 32,145 rental households with incomes below 50% HAMFI. This indicates that rental households needing affordable or subsidized housing far outnumber the number of units available through such programs.

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

Federal law requires any LIHTC properties awarded credits after 1989 to maintain affordability for 30 years, although after the first 15 years, owners can leave the program through a relief process. After 30 years (or 15 years if owners are granted regulatory relief), properties can be converted to market-rate units. Of the 2,194 LIHTC low-income units within Orange County but outside of Orlando, 184 have been in service since 1992 and therefore may lose affordability status this year. An additional 333 units expire within the next 5 years, for a total of 517 units by 2027. If the affordability restrictions on these expiring LIHTC units cannot be retained and new LIHTC units are not developed to compensate for the losses, this would leave Orange County with a total of 1,677 affordable units through the LIHTC program.

³ [Assisted Housing: National and Local | HUD USER](#)

⁴ <https://www.orangecountyfl.net/NeighborsHousing/RentalAssistance.aspx#.Yor90ejMLe9>

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

This section establishes that Orange County contains 22,614 low-income units through the LIHTC program and an additional 8,667 units through public housing and Housing Choice voucher programs for a total of 31,281 units available to low-income residents. However, 2018 CHAS data shows that 64,575 renter households in Orange County have incomes below 50% HAMFI, meaning that there are only half as many affordable housing units available as there are renter households in need of low-cost housing. 2020 ACS data shows that 46% of rental households in Orange County are cost burdened, spending over 30% of their income on housing, further highlighting a need for greatly increased availability of affordable housing units.

Describe the need for specific types of housing:


Data discussed in the Housing Needs Assessment and in this section indicate a particular need for rental and for-sale housing that is affordable to low- and moderate-income households. Housing types that allow for increased affordability of both rental and homeownership units might include options such as smaller housing units: multifamily missing middle housing, including duplexes, triplexes, quadruplexes, and other small multifamily units; accessory dwelling units; cohousing with shared services; or tiny homes. Rehabbing units that are aging or dilapidated or that have poor energy efficiency can also increase the number of high-quality affordable units. Additionally, residents at community meetings noted a need for housing assistance funding available to residents of mobile and prefabricated homes which are excluded from many forms of HUD funding, particularly funding for home rehab. Residents also noted issues with the ability to fund home rehab or improvement projects that were suited specifically to the needs of the elderly, such as modifications to increase accessibility.

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

Introduction

Housing cost data shows that while home values fell 18% in the 2009-2017 period, rents increased 14% in the same period. These contradictory trends indicate that an under-supplied housing market may be driving up rental costs, and that Orange County should place high importance on increasing safe and adequate housing unit supply, particularly in units affordable to residents with incomes below 30 to 50% HAMFI who may be unable to compete in an inflated rental economy – Table 30 shows that as of 2017 such renters only had access to 8% of rental units.

Based on the Census and ACS data supplied by HUD for this plan, median home values in Orange County fell from \$233,900 to \$192,400 between 2009 and 2017; however, this data does not capture the current post-COVID spike in housing prices. 2020 ACS data shows that median housing values rebounded to \$232,000 in that year, nearly exactly the same as 2009 levels. Using a more current and market-based source, Redfin estimates the 2022 median sale price of an Orange County home to be \$395,000 – a 19.7% increase from just the year prior and a 70.2% increase over the 2020 American Community Survey's figure.⁵



“I once thought home ownership was out of reach for me. The down payment assistance program through Orange County Housing and Community Development allowed me to become a homeowner as a single female and paved the path for me to own this home free and clear 14 years later.”

— *Orange County Homeownership Program Client*

Median rent never experienced a downturn. From 2009-2017, median rent increased from \$822 to \$935, or a 14% increase; by 2020, median rent reached \$1,218, marking a 30% increase in just three years and a nearly 50% increase since 2009. While 2022 data on the County as a whole is difficult to source, more current data on the Central Florida area may be sourced from RentHub, an innovative data tracking platform focused on tracking rental statistics nationwide. RentHub reports that as of April 2022, median rent for the Central Florida area encompassing Orange County has skyrocketed to \$2,100 – a 16.7% increase from April 2021 and a staggering 124.6% increase since the 2020 American Community Survey⁶. Additionally, RentCafe reports that only 4% of housing units in Orlando are rented for under \$1,000⁷. These sobering statistics highlight the urgent need for housing units accessible to low-income residents.

⁵ Redfin.com. Orange County Housing Market Report: <https://www.redfin.com/county/484/FL/Orange-County/housing-market>, accessed May 25, 2022.

⁶ <https://app.dataherald.com/visualization/edit/62151ab93203c500a1aaed18>

⁷ <https://www.rentcafe.com/average-rent-market-trends/us/fl/orlando/>

Cost of Housing

Table 31 – Cost of Housing

	Base Year: 2009	Most Recent Year: 2017	% Change
Median Home Value	233,900	192,400	(18%)
Median Contract Rent	822	934	14%

Data Source: 2000 Census (Base Year), 2013-2017 ACS (Most Recent Year)

Table 32 - Rent Paid

Rent Paid	Number	%
Less than \$500	9,275	7.2%
\$500-999	66,409	51.2%
\$1,000-1,499	43,490	33.6%
\$1,500-1,999	7,632	5.9%
\$2,000 or more	2,408	1.9%
Total	129,214	99.7%

Data Source: 2013-2017 ACS

Housing Affordability

Table 33 – Housing Affordability

% Units affordable to Households earning	Renter	Owner
30% HAMFI	2,311	No Data
50% HAMFI	8,017	13,271
80% HAMFI	53,749	38,594
100% HAMFI	No Data	62,163
Total	64,077	114,028

Data Source: 2013-2017 ACS

Monthly Rent

Table 34 – Monthly Rent

Monthly Rent (\$)	Efficiency (no bedroom)	1 Bedroom	2 Bedroom	3 Bedroom	4 Bedroom
Fair Market Rent	932	1,004	1,190	1,576	1,879
High HOME Rent	770	826	993	1,139	1,251
Low HOME Rent	607	651	781	902	1,007

Data Source: HUD FMR and HOME Rents

Is there sufficient housing for households at all income levels?

Orange County is severely lacking in housing for renters below 50% HAMFI. 2020 ACS data indicates that two thirds of all renters in Orange County, or 67.3%, spend over 25% of their income each month on rent, with 46% of all renters spending over 35% of their income on rent each month. ACS only notes 2,311 units available to renters under 30% HAMFI, while 2014-2018 CHAS data indicates that there are 32,430 such rental households in Orange County – 14 times more households in need than available housing units. Similarly, 32,145 renters from 30-50% HAMFI compete for 8,017 housing units.

Homeowners in Orange County experience significantly better housing conditions than renters, but rapidly rising home values suggest that the situation is precarious. 2018 CHAS data indicates that the majority of Orange County homeowners, or 73%, spent less than 30% of their household income on housing expenses. Only 11% of homeowners were severely cost burdened (i.e. spending more than 50% of their incomes on housing costs) in comparison to 26% of renters. It is important, however, to consider this data in the light of current housing market trends – as discussed above, median home values have risen as much as 70% since 2017 and therefore it is reasonable to conclude that a larger percentage of new homeowners may be considered severely cost burdened.

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

Orange County rents experienced a moderate rise from 2009-2017. Since 2017 and particularly since 2020, both home values and rents have experienced a dramatic upturn that far outpaces that of both typical inflation and resident earnings. This is highlighted by ACS data indicating that as of 2020, 46% of Orange County renters were cost burdened. As discussed above, since 2020, rents have increased over 100% in much of Orange County, while median home values have increased 70%. These figures suggest that 2022 cost burden data, while not currently available, is likely to show a significant increase in cost burdened households in comparison to 2018.

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

Data displayed in tables 28 and 31 shows that as of 2017, median rent in Orange County was below fair market value for all housing unit categories except efficiency (no bedroom/studio unit), meaning that there was a sizeable selection of units available to housing choice voucher holders. However, RentHub suggests that as of 2022 median rent for Orange County hovers around \$2,100⁸, and 2022 fair market rents for Orange County fall significantly below this figure for all units except those with four or more bedrooms, which register at \$2,211⁹. (Other 2022 fair market rents are \$1,152, \$1,237, \$1,422, and \$1,827 for efficiency, one bedroom, two bedroom, and three bedroom units, respectively). This change indicates that residents using rental assistance

⁸ <https://app.dataherald.com/visualization/edit/62151ab93203c500a1aaed18>

⁹ <http://flhousingdata.shimberg.ufl.edu/income-and-rent-limits/results?nid=1>

in 2022 will encounter substantial difficulties in finding any affordable units. Additionally, this data does not take housing condition into account, which may be of growing concern in an extremely competitive market. This trend further highlights both the severe lack of affordable rental housing in Orange County and the extremely rapid pace of inflation in the 2022 housing market for renters and homeowners.

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

Introduction

This section examines the condition of housing in Orange County, including the presence of selected housing conditions: (1) lack of complete plumbing facilities, (2) lack of complete kitchen facilities, (3) more than one person per room, and (4) cost burden greater than 30%. This section also examines the age of housing stock, vacancy rate and suitability of vacant housing for rehabilitation, and the risk of lead-based paint hazards.

Renters in Orange County are significantly more likely than homeowners to reside in a home with at least one negative condition, with 56% of renters experiencing one or more selected condition in comparison to only 28% of homeowners. Cost burden is the most frequently occurring issue, with 46% of renters being cost burdened in the 2020 American Community Survey, with 26% being severely cost burdened. In contrast, only 27% of homeowners were cost burdened, with only 11% severely cost burdened.

4% of renters in Orange County, or 4,923 households, experienced two selected conditions, in contrast with 1,325 homeowner households. This indicates that renters are more likely than homeowners to experience overcrowding and inadequate plumbing or kitchen facilities.

There is no significant distinction in age of housing stock between rented and owned units. Units built between 1980-1999 make up 43-44% of stock in both categories, with units built in the periods of 1950-1979 and 2000-current making up 26-28% each of housing stock in both renter and owner-occupied categories. Only 2% of occupied homes in Orange County were built before 1950. These similarities in housing stock age indicate that age is not the primary cause of a higher prevalence of negative selected conditions in rental households.

Definitions

Cost burden in this section is defined as a situation in which a household spends more than 30% of its income on housing. **Severe cost burden** is when a household spends more than 50% of its income on housing.

Housing quality standards for subsidized units are defined by HUD. A unit is defined as “substandard” if it lacks complete plumbing, a complete kitchen, or heating fuel (or uses heating fuel that is wood, kerosene, or coal). A unit is “substandard but suitable for rehabilitation” if it lacks complete plumbing, a complete kitchen or a reliable and safe heating system but has some limited infrastructure that can be improved upon. These units are likely to have deferred

“I tried while I was working to do what I could to fix up our house but never had enough resources. My neighbor told us about the County's homeowner rehabilitation program. We did what was asked of us and before you know it, we were out of the house for the renovations. We love the work that was done.”

— *Orange County Homeowner Rehabilitation Program Client*

maintenance and may have some structural damage such as leaking roofs, deteriorated interior surfaces, and inadequate insulation. If not a part of public water or sewer systems, they must have sufficient systems to allow for clean water and adequate waste disposal.

Condition of Units

Table 35 - Condition of Units

Condition of Units	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
With one selected Condition	53,175	27%	66,750	52%
With two selected Conditions	1,325	1%	4,923	4%
With three selected Conditions	79	0%	65	0%
With four selected Conditions	0	0%	0	0%
No selected Conditions	138,845	72%	57,830	45%
<i>Total</i>	<i>193,424</i>	<i>100%</i>	<i>129,568</i>	<i>101%</i>

Data Source: 2013-2017 ACS

Year Unit Built

Table 36 - Year Unit Built

Year Unit Built	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
2000 or later	54,870	28%	34,599	27%
1980-1999	84,838	44%	55,750	43%
1950-1979	50,009	26%	36,854	28%
Before 1950	3,669	2%	2,380	2%
<i>Total</i>	<i>193,386</i>	<i>100%</i>	<i>129,583</i>	<i>100%</i>

Data Source: 2013-2017 CHAS

Risk of Lead-Based Paint Hazard

Table 37 - Risk of Lead-Based Paint

Risk of Lead-Based Paint Hazard	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
Total Number of Units Built Before 1980	53,678	28%	39,234	30%
Housing Units build before 1980 with children present	40,146	21%	21,360	16%

Data Source: 2013-2017 ACS (Total Units) 2013-2017 CHAS (Units with Children present)

Vacant Units

Table 38 - Vacant Units¹⁰

Unit Type	Vacant Units	% of Total Units
Vacant Rental Units	20,116	5.2%
Vacant Homeowner Units	23,317	6.0%
Vacant "Other" Units	10,028	2.5%
Total Vacant Units	53,461	13.7%

Data Source: 2020 ACS 5-year estimates

Need for Owner and Rental Rehabilitation

Nearly three-quarters of Orange County's housing stock is over 20 years old, with around 30% constructed before 1980. Age of housing stock makes it likely that Orange County has a need for accessible and affordable housing maintenance and rehabilitation. In community engagement sessions, senior citizens in Orange County expressed need for programs to fund housing rehabilitation in ways that are accessible to both residents on Social Security and residents in mobile or manufactured homes. These residents also mentioned additional needs senior citizens may have for accessibility related home modifications.

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

Exposure to lead-based paint represents one of the most significant environmental threats from a housing perspective. Housing conditions can significantly affect public health, and exposure to lead may cause a range of health problems for adults and children. The major source of lead exposure comes from lead-contaminated dust found in deteriorating buildings, including residential properties built before 1978 that contain lead-based paint. Unfortunately, measuring the exact number of housing units with lead-based paint hazards is difficult. However, risk factors for exposure to lead include housing old enough to have been initially painted with lead-based paint (i.e., pre-1978), households that include young children, and households in poverty. Table 34 identifies the total number of housing units in Orange County built before 1980 and the total number of renter and owner units built before 1980 that house children under age 6. This includes 40,146 owner-occupied units (21% of all owner-occupied housing units) and 21,360 renter-occupied units (16% of total renter-occupied housing units) with at least two risk factors for exposure to lead-based paint (built before 1980 and housing young children).

¹⁰ Note: Unlike data in other tables presented in this section, the vacant units data is for the entirety of Orange County, including all its municipalities (and not just the entitlement jurisdiction). While 2020 data was the most current available at the time this plan was drafted, the housing market has changed considerably since that time. Counted among the vacant units may be vacation rentals, second homes, and structures that are dilapidated and no longer habitable.

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

Introduction

Orange County, excluding the City of Orlando, offers 171 public housing units located in the City of Winter Park and 205 public housing units offered by the Orlando Housing Authority. The Orange County Housing and Community Development Division also offers 1,263 Section 8 housing choice vouchers in the County. When the City of Orlando is included in these counts, Orange County offers a total of more than 4,000 housing choice vouchers. The Orlando Housing Authority offers 2,481 of these vouchers, which may be located both within the City of Orlando or in other locations in Orange County.

Totals Number of Units

Table 39 – Total Number of Units by Program Type

	Certificate	Mod-Rehab	Public Housing	Program Type					
				Vouchers					
				Total	Project-based	Tenant-based	Special Purpose Voucher		
							Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
# of units vouchers available	0	94	1,682	4,653	0	3,473	1,333	808	809
# of accessible units									

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

Data Source: PIC (PIH Information Center)

Describe the supply of public housing developments:

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:

The Winter Park Housing Authority offers 171 public housing units at two developments: Tranquil Terrace and The Meadows. Tranquil Terrace was built in 1975 and contains 52 senior units. The Meadows, also built in 1975, contains the remaining 119 public housing units for families. Overall, these developments are in good condition, with the housing authority finding that there was “no impairment of long-lived assets” in late 2019.¹¹ The Orlando Housing Authority has three public housing sites in Orange County: Meadow Lake Apartments, Omega Apartments, and Marden Meadows Apartments. The oldest of these three developments, Meadow Lake Apartments, was built in 1976 and offers 87 units for persons with disabilities. The Omega Apartments and Marden Meadows both offer family units. Omega Apartments, built in 1983, contains 73 family units.

¹¹ Winter Park Housing Authority. “FY 2020 Agency Plan Annual Update.” p. 44

Marden Meadows, built in 1988, offers 45 family units. Currently, the OHA plans to retain these housing developments, although it submitted Section 18 inventory removal applications to demolish six other public housing in 2019: Griffin Lake Apartments, Ivey Lane Homes, Lake Mann Homes, Lorna Doone Apartments, Murchison Terrace Apartments and Reeves Terrace Apartments.¹² The Orange County HCD Division does not offer public housing.

Public Housing Condition

Table 40 - Public Housing Condition

Public Housing Development	Average Inspection Score
Tranquil Terrace/The Meadows, 845 W. Swoope Avenue, Winter Park, FL 32789	88
Meadow Lake, 3564 Meadow Lake Lane, Orlando, FL 36740	96
Omega Apartments/Marden Meadows, 7424 Kappa Court, Orlando, FL 36740	91

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

In 2021, the WPHA Board discussed a need for repairs to stucco and fascia board at The Meadows Apartments and Tranquil Terrace. The Board also discussed a need for exterior painting at The Meadows and repairs to balconies at Tranquil Terrace.¹³ The Meadow Lake Apartments, owned by the Orlando Housing Authority, is currently in need of several revitalization activities: lift station pump replacement, installation of an emergency generator in the Community Room, elevation of sidewalks to eliminate wooden ramps, and cleaning of building roofs and the adjoining pond. The Omega Apartments and Marden Meadows both require ADA upgrades to their offices, as well as interior renovations such as bathtub, bathroom floor/tile, stair, and storage door replacements and re-mulching of the playground at the Omega Apartments.

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

The Winter Park Housing Authority offers several programs for residents. The WPHA maintains a Fresh food bus stop and Second Harvest food pantry at Tranquil Terrace Apartments. Programs for youth include Back to School events and afterschool programs at the Boys & Girls Clubs of Central Florida. The afterschool program offers education and career development, character and leadership development, sports, fitness and recreation, health and life skills, and arts and technology. Residents also have access to Lutheran Counseling Services that offers counseling to individuals, couples, and families. In addition, Jewish Family Services of Greater

¹² Comments from OHA staff and the Orlando Housing Authority "FY 2022 Moving to Work Annual Plan." <https://www.hud.gov/sites/dfiles/PIH/documents/OrlandoFY22Plan.pdf>, p. 12

¹³ Winter Park Housing Authority Board. (July 13, 2021) "Board Meeting Minutes." <https://cityofwinterpark.org/docs/government/boards/historical-archive/minutes/WPHA-min-2021-07-13.pdf?ver=1653995309719>

Orlando provides food through its Pearlman Emergency Food Pantry and transportation services for elderly persons.

The Orlando Housing Authority's Community Affairs and Communication/Moving to Work Department connects residents with a variety of services, partnering with agencies such as the Second Harvest Foodbank of Central Florida, Compassion City, DNF Medical Centers, the Senior Resource Alliance, the Shine Program, and Healthcare Center for the Homeless. Through these partnerships, the OHA makes referrals for such personal and professional needs as adult education, securing benefits/entitlements, computer training, employment, financial instruction, health/medical/nutrition assistance and transportation.

The Orange County Housing and Community Development Division also offers a range of services targeting low-income populations, which are available to public housing residents countywide. The County funds Head Start programs for families at or below 100% of the federal poverty level. In addition to receiving early childhood education, parents with children in Head Start can access health, nutrition, and mental health resources, as well as other supportive services for their families. The County's Citizens Commission for Children funds 13 Neighborhood Centers for Families, providing counseling services, tutoring, senior activities and other resources in communities throughout the County. Uninsured County residents earning at or below 125% of the federal poverty level are eligible to receive short-term medical care at the Orange County Medical Clinic. Lastly, Orange County offers low-income County residents with immediate interventions to reduce their vulnerability to financial hardships. The County offers emergency rental assistance and assistance with claiming veterans' benefits. The County also manages the Community Action centers in Orange County, which assists renters, homeowners, and service agencies by administering the Low-Income Home Energy Assistance Program (LIHEAP), the Community Services Block Grant (CSBG), and the Weatherization Assistance Program (WAP).

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

Introduction

A range of facilities provide housing and services to support people experiencing homelessness within the Orlando/Orange, Osceola, Seminole Counties CoC area, which includes Osceola, Seminole and Orange counties, and the cities of Orlando, Kissimmee, and Sanford. Using data from the Continuum of Care, this section provides an overview of shelter facilities, housing, and mainstream and other services that aim to meet the needs of people experiencing homelessness in Orange County and the Continuum of Care area.

Facilities and Housing Targeted to Homeless Households

Table 41 - 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)	74	20	50	0	
Households with Only Adults	61		84	160	
Chronically Homeless Households	0		0	160	
Veterans	0		42	0	
Unaccompanied Youth	0		0	0	

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

A variety of mainstream services complement services targeted to people experiencing homelessness in Orange County. The Homeless Services Network of Central Florida focuses on supporting coordination and collaboration among these systems so that people experiencing homelessness can access mainstream resources to assist them in transitioning to and remaining stable in permanent housing. Examples of health, mental health, employment, and other services that complement services targeted to people experiencing homelessness in Orange County include:

- CareerSource Central Florida connects residents with employers, provides worker resources and training, and prepares residents for careers that meet local business needs.
- The Central Florida Urban League's workforce development program assists job seekers in upgrading their skills and finding employment, and its Center for Workforce Innovation facilitates job-specific training.
- Goodwill Industries of Central Florida provides education, training, and career services.
- The Florida Department of Health in Orange County provides clinical and nutrition services, wellness and prevention programs, community health planning and statistics, environmental health programs, emergency preparation and response, and infectious disease services.
- The Health Care Center for the Homeless provides primary care, dental services, and a pharmacy through its Orange Blossom Family Health Center and Ivey Lane Clinic. The center also offers behavioral health and substance abuse counseling, homeless outreach, and mobile health services.
- Shepherd's Hope provides free non-emergency medical care for residents who are uninsured, do not have Medicare or Medicaid, and have a family income at or below 200% of Federal Poverty Level.
- Hospitals such as AdventHealth Orlando and Orlando Health provide a variety of health services.
- Aspire Health Partners provides substance abuse and mental health services.

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.

While most facilities that serve homeless persons are located in the CoC area and located in the City of Orlando, there are several agencies that serve persons who are homeless in Orange County outside of Orlando city limits. They include:

- Aspire Health Partners provides 84 transitional housing beds.

- Catholic Charities of Central Florida provides 34 rapid rehousing beds for families with children.
- Coalition for the Homeless of Central Florida provides 77 rapid rehousing beds for individual adults and families with children.
- Family Promise of Greater Orlando- Orange County provides 34 emergency shelter beds.
- Grand Avenue Economic Community Development Corp. provides 75 permanent supportive housing beds for chronically homeless adults.
- Harbor House of Central Florida provides 120 emergency shelter beds for individual adults and families with children who are victims of domestic violence.
- Homeless Services Network of Central Florida provides one emergency shelter bed through its isolation and recovery center.
- LifeStream Behavioral Health Center provides 50 transitional housing beds for families with children.
- Orange County Government provides 63 emergency shelter beds for individual adults through its Shelter Plus Care program.
- Samaritan Resource Center provides eight rapid rehousing beds for individual adults.
- Wayne Densch Center provides 22 permanent supportive housing beds for individual adults at risk of homelessness who are severely mentally ill, have an alcohol or drug addiction, or are dually diagnosed.

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

Introduction

This section describes the housing and social service needs of specific populations, including the elderly and frail elderly, people with disabilities, residents with diagnosis of HIV/AIDS, residents with substance use or mental health disorders, and survivors of domestic violence.

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

Seniors and People with Disabilities

The elderly and people with disabilities often need housing that provides access to transit or transportation services to facilitate access to resources, services, and/or employment. Access to these needs should be primary considerations in the location of supportive housing for seniors and people with disabilities. Supportive services for the elderly and people with disabilities may include health services, assistive technologies, independent living support, and educational assistance and planning for children with disabilities.¹⁴ People with intellectual and developmental disabilities may also require case management or life skills programming. Housing should focus on integrating these populations into the community, reducing social isolation through programming, and facilitating access to resources and services.

People with Substance Use Disorders

People with alcohol or other substance use disorders may need services including screening, diagnosis, assessment, and treatment. People recovering from these disorders may need recovery supportive services, including clinical case management, housing and transportation assistance, mental health services, family engagement, behavioral therapy, and vocational and education, childcare, financial, and health services.¹⁵

People Living with HIV/AIDS

Low-barrier housing free from requirements such as those surrounding drug testing, sobriety, criminal background, and medical appointments is a primary need for people living with HIV/AIDS. A Housing First model, in which housing is provided without these kinds of barriers, increases access to housing and reduces risk of homelessness for people living with HIV/AIDS. Like other special needs populations, people living with HIV/AIDS need housing that provides easy access to health services, resources, and employment. This population may need case management services; however, the Housing First model emphasizes that supportive services should not be required for people living with HIV/AIDS to access housing. In addition to low-

¹⁴ Centers for Disease Control and Prevention. (n.d.) Disability and health information for people with disabilities. Retrieved from: <https://www.cdc.gov/ncbddd/disabilityandhealth/people.html>

¹⁵ Rural Health Information Hub. (n.d.) Treatment and Recovery Support Services. Retrieved from: <https://www.ruralhealthinfo.org/toolkits/substance-abuse/1/support-services>

barrier housing, people living with HIV/AIDS may need a variety of services, including access to core medical services, as well as supportive services, including childcare services, medical transportation, and non-medical case management, among others.¹⁶

Public Housing Residents

Public housing residents often need supportive services such as case management and long-term follow-up; employment services, including transitional jobs, job-search assistance, sector-based job training, work-related childcare support, and continuing technical and professional education; programs that teach financial literacy; and housing counseling.

Some public housing residents need more intensive case-management and may benefit from integrated supportive housing, in which small numbers of permanent family-supportive housing units are incorporated into mixed-income developments, and case management and services are provided on-site. Vouchers with wraparound services provide an alternative model in which case managers support voucher-holders with the same services delivered in permanent supportive housing. Incentives models may also support families in moving toward self-sufficiency by providing rewards for achievements, such as paying rent on time, getting their children to school, applying for a job, and volunteering.

Finally, some public housing residents – particularly those with serious physical and mental health disabilities – may have greater supportive service needs, such as assisted living (meals, housekeeping, activities, health care, case management, grocery store access) and on-site services, including parenting support, childcare, and after-school services for those who have custody of children or grandchildren.¹⁷

Survivors of Domestic Violence

The greatest need for survivors of domestic violence is access to safe and affordable housing. Transitional housing options may also provide supportive services such as counseling, childcare, transportation, life skills, education and job training for up to 24 months, providing survivors time and services to obtain safety and stability.¹⁸

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

People with mental health and substance abuse disorders often require supportive housing following discharge from inpatient treatment to reduce risk of homelessness. People returning

¹⁶ Health Resources and Services Administration. (n.d.). Get HIV Care and Treatment. Retrieved from: <https://hab.hrsa.gov/get-care/get-hiv-care>

¹⁷ Theodos, B., Popkin, S. J., Parilla, J., & Getsinger, L. (2012). The challenge of targeting services: a typology of public-housing residents. *Social Service Review*, 86(3), 517-544.

¹⁸ Rogers, L. (2019). Transitional housing programs and empowering survivors of domestic violence. Retrieved from: <https://www.justice.gov/ovw/blog/transitional-housing-programs-and-empowering-survivors-domestic-violence>

from these institutions need access to affordable housing and health services and may also require supportive services such as case management and transportation assistance.

Permanent supportive housing should be affordable, close to needed health services, and accessible to transportation options. The use of funds such as those provided through the HOME Investment Partnerships program can support the development of affordable housing near services and transportation, facilitating access to care and resources and supporting the use of in-home services.

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)

The County's first year Annual Action Plan specifies the activities it plans to support during the 2022 program year to address housing and/or supportive service needs. These include:

- Case management and crisis intervention,
- Children's services for victims of domestic violence, and
- Services for the elderly and people with disabilities.

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

Negative Effects of Public Policies on Affordable Housing and Residential Investment

Orange County, like other counties in Central Florida and across the country, is experiencing an affordable housing crisis. A 2019 study conducted by the University of Florida's Shimberg Center for Housing Studies noted that 98,654 renter households in the Orlando area spend more than 40% of their monthly income on rent alone.¹⁹ The study further observed that an increasing renter rate was matched by an overall declining homeowner rate (down 7 percentage points between 2007 and 2017). Many new renter households had lower incomes, with approximately 59,000 households earning less than 60% AMI and over 76,000 total households being cost burdened. Cumulatively, these trends indicate a need for the creation of additional renter housing and the preservation and creation of affordable housing for purchase.

In its 2019 Housing for All 10-Year Action Plan, Orange County's Housing for All Task Force identified several regulatory barriers to affordable housing and residential investment. The plan encouraged a number of changes to the zoning code, such as removing barriers to accessory dwelling units, reducing minimum living area requirements, reducing parking requirements and allowing flexible lot configurations. Some of these barriers have already been addressed; for example, changes were made to the county's Accessory Dwelling Unit regulations in October 2019 to allow ADUs in all residential zoning districts. Flexible lot configurations are allowed under the Planned Development (PD) zoning district, the Cluster (R-CE) zoning district, and the Horizon West Town Center Planned Development Code. Other zoning requirements and design standards are also flexible within specified districts.

¹⁹ Shimberg Center for Housing Studies. (2019) "Orlando Area Affordable Rental Housing Needs: 2019 Update." http://www.shimberg.ufl.edu/publications/Orl_af_hsg_2019.pdf

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

Introduction

This section outlines employment, labor force, and educational attainment data that informs the Consolidated Plan's priorities and goals.

Economic Development Market Analysis

Business Activity

Table 42 - 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	2,618	3,524	1	1	0
Arts, Entertainment, Accommodations	105,514	84,535	24	19	-5
Construction	25,733	27,921	6	6	0
Education and Health Care Services	59,650	49,977	14	11	-2
Finance, Insurance, and Real Estate	28,056	33,171	6	7	1
Information	9,342	11,310	2	3	0
Manufacturing	16,993	19,565	4	4	1
Other Services	13,878	15,452	3	3	0
Professional, Scientific, Management Services	40,763	44,042	9	10	1
Public Administration	0	0	0	0	0
Retail Trade	55,997	62,469	13	14	1
Transportation and Warehousing	16,203	14,874	4	3	0
Wholesale Trade	16,310	19,670	4	4	1
Total	391,057	386,510	--	--	--

Data Source: 2013-2017 ACS (Workers), 2017 Longitudinal Employer-Household Dynamics (Jobs)

Labor Force

Table 43 - Labor Force

Total Population in the Civilian Labor Force	504,036
Civilian Employed Population 16 years and over	469,575
Unemployment Rate	6.83
Unemployment Rate for Ages 16-24	17.69
Unemployment Rate for Ages 25-65	4.51

Data Source: 2013-2017 ACS

Table 44 - Occupations by Sector

Occupations by Sector	Number of People
Management, business and financial	111,790
Farming, fisheries and forestry occupations	21,635
Service	53,807
Sales and office	123,085
Construction, extraction, maintenance and repair	36,513
Production, transportation and material moving	22,199

Data Source: 2013-2017 ACS

Travel Time

Table 45 - Travel Time

Travel Time	Number	Percentage
< 30 Minutes	236,440	54%
30-59 Minutes	174,052	40%
60 or More Minutes	27,525	6%
<i>Total</i>	<i>438,017</i>	<i>100%</i>

Data Source: 2013-2017 ACS

Education:

Educational Attainment by Employment Status (Population 16 and Older)

Table 46 - Educational Attainment by Employment Status

Educational Attainment	In Labor Force		Not in Labor Force
	Civilian Employed	Unemployed	
Less than high school graduate	33,475	3,464	19,679
High school graduate (includes equivalency)	89,560	7,269	32,245
Some college or Associate's degree	126,290	7,340	33,295
Bachelor's degree or higher	139,245	5,480	24,384

Data Source: 2013-2017 ACS

Educational Attainment by Age

Table 47 - Educational Attainment by Age

	Age				
	18-24 yrs	25-34 yrs	35-44 yrs	45-65 yrs	65+ yrs
Less than 9th grade	1,589	3,860	5,049	10,662	12,497
9th to 12th grade, no diploma	11,021	11,164	9,437	16,423	10,207
High school graduate, GED, or alternative	27,529	32,479	32,068	64,495	31,294
Some college, no degree	49,979	32,278	24,818	47,434	18,883
Associate's degree	12,562	19,727	16,064	26,695	7,568
Bachelor's degree	10,503	36,589	31,153	48,620	16,884
Graduate or professional degree	367	12,032	15,043	25,702	11,221

Data Source: 2013-2017 ACS

Educational Attainment - Median Earnings in the Past 12 Months

Table 48 - Median Earnings in the Past 12 Months

Educational Attainment	Median Earnings in the Past 12 Months
Less than high school graduate	1,019,455
High school graduate (includes equivalency)	1,436,115
Some college or Associate's degree	1,738,265
Bachelor's degree	2,424,400
Graduate or professional degree	3,008,385

Data Source: 2013-2017 ACS

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

The employment sectors in Orange County with the largest number of jobs are arts, entertainment, and accommodations (84,535 jobs or 21.9% of the total), retail trade (62,469 jobs or 16.2%), education and healthcare services (49,977 jobs or 12.9%), and professional, scientific, and management services (44,042 jobs or 11.4%).

The jobs in which most residents are employed reflect these major employment sectors. The largest numbers of Orange County residents work in arts, entertainment, and accommodations (105,514 workers or 27.0% of the total); education and healthcare services (59,650 workers or 15.3%); retail trade (55,997 workers or 14.3%); and professional, scientific, and management services (40,763 workers or 10.4%).

Describe the workforce and infrastructure needs of the business community:

The East Central Florida Regional Planning Council prepared a Comprehensive Economic Development Strategy (CEDS) for the East Central Florida region in 2017. The CEDS identified goals and strategies for economic development related to workforce and infrastructure in the region, including:

- Support educational partnerships and activities that encourage learning opportunities for East Central Florida residents;
- Promote programs and activities that prepare our workforce for lifelong learning and ever-changing careers;
- Increase the educational attainment of the East Central Florida workforce;
- Attract and retain young talented workers;
- Identify how SunRail station areas can become more attractive locations for new businesses and communities;
- Assist with redevelopment and place-making efforts;
- Promote smart growth principles and the development of community amenities;
- Protect the region's natural assets through best practices; and
- Support CEDS Partners in their projects and activities.

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.

The region's 2017-2022 CEDS identifies changes anticipated to impact workforce development, business support, and infrastructure, including:

- The region has added more than 1.5 million residents during the past 25 years, and this high growth rate is expected to continue until 2040.
- While dependence of service jobs is a national trend, it seems to be more pronounced in East Central Florida because of its high volume of retirees and its dependence on leisure

industries. Strong dependence on service jobs is affecting the region's productivity levels and the economic well-being of its residents.

- The region's businesses are having a tough time recruiting people to fill their open positions. The manufacturing and health care industries showed the higher difficulties in recruiting qualified workers. Both of these industries offer pathways to training and higher paying careers.
- Economic growth is expected to continue over the next 25 years driven by the Professional and Business Services, Leisure and Hospitality, and the Educational and Health Services economic super sectors.
- East Central Florida is home to several competitive high technology clusters that offer great opportunities to further diversify the region's economy. These regional innovation clusters are Boats and Other Vessels, Aviation, Photonics, Modeling Simulation and Training, Turbine Technologies, and Antennas and Telecommunications.
- The East Central Florida region is home to seven unique natural jewels that are currently under threat because of urban sprawl, over ground water extraction, water body pollution, and sea level rise. The high number of residents expected to move into the region within the next 25 years would put even more pressure on these precious systems.
- Despite the progress made during the past few years, the region's public transportation system is still inadequate for a burgeoning region.
- The region's sprawling communities are dangerous for pedestrians and relatively expensive to live in.
- Job sprawl is a common feature in East Central Florida, with the densest employment centers located along I-4. There are currently several efforts underway throughout the region to activate and revitalize downtown core areas and traditional commercial corridors.

In addition to these changes, the COVID-19 pandemic has created additional economic challenges for economic development, including health and safety concerns, loss of revenue for businesses and local governments, job losses, need for additional childcare with school closures, difficulty for businesses in maintaining employees, travel restrictions, and supply chain issues, among other concerns.

COVID-19 has severely impacted economic development in the Orlando metro area, which had among the top 10% highest employment declines of all metro areas from November 2019 to November 2020.²⁰ The metro's concentration in the hard-hit leisure and hospitality sectors contributed to its particularly high levels of unemployment rate, which climbed from 2.7% in November 2019 to 7.7% in November 2020. Hispanic or Latino workers, who make up a significant proportion of the County and metro workforce, have been particularly negatively impacted by the COVID-19 recession.²¹

²⁰ Klein, A., and Smith, E. (2021). Explaining the economic impact of COVID-19: Core industries and the Hispanic workforce. Brookings. Retrieved from: <https://www.brookings.edu/research/explaining-the-economic-impact-of-covid-19-core-industries-and-the-hispanic-workforce/>

²¹ Ibid.

While Orange County and the metro area were particularly hard-hit by COVID-19, unemployment in the area has dropped sharply through 2022, following the availability of vaccines and the return of travel, leisure, and hospitality activities. The unemployment rate in Orange County (including Orlando) declined from 5.7% in April 2021 to 2.6% in April 2022.²² Although unemployment has declined, many concerns highlighted by the COVID-19 pandemic remain, such as childcare needs, difficulty recruiting and maintaining workers, and supply chain issues.

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

The 2017-2022 CEDS details the findings of the Central Florida Talent Gap Analysis, which showed that 61% of companies in the region experience difficulty hiring qualified staff, slightly lower than the national rate. Primary reasons for not filling new positions include lack of experience, technical and soft skills competencies, and available applicants. The industries that reported the greatest difficulty filling positions were manufacturing, hospitality, and healthcare. The Central Florida Talent Gap Analysis provides recommendations to address the skills gap, including expanding regional marketing efforts, the Quick Response and Incumbent Worker Training programs, the Career Pathways model, and other training opportunities for post-secondary students. Additional recommendations include increasing cross disciplinary skills development, allowing the marketing of jobs across CareerSource boundaries, and establishing peer-to-peer groups between businesses and education networks.

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.

Workforce training initiatives that will support Orange County's Consolidated Plan include:

- CareerSource Central Florida provides services for businesses and job in locations throughout Lake, Orange, Osceola, Seminole, and Sumter County. Services for job seekers include hiring events, career coaching and placement, resume assistance, workshops, and employment services for residents with disabilities. CareerSource Central Florida's services support the Consolidated Plan's goals of reducing poverty-level families and encouraging economic opportunity for low-income residents.
- Embrace Family Solutions provides job placement and apprenticeships at nonprofit organizations for low-income young adults in Orange County.
- First Step Staffing provides employment and job training for residents experiencing homelessness in Orange County.
- Colleges across the region—including University of Central Florida, Daytona State, Eastern Florida State, Lake-Sumter State, Seminole State, and Valencia College—offer a

²² Florida Department of Economic Opportunity. (2022). Local Area Unemployment Statistics. Retrieved from: <https://floridajobs.org/workforce-statistics/data-center/statistical-programs/local-area-unemployment-statistics>

variety of continuing education programs that may assist adult learners advance their skills and improve employment opportunities.

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

Orange County is covered in the 2017-2022 Comprehensive Economic Development Strategic Plan (CEDS) for East Central Florida completed by the East Central Florida Regional Planning Council.

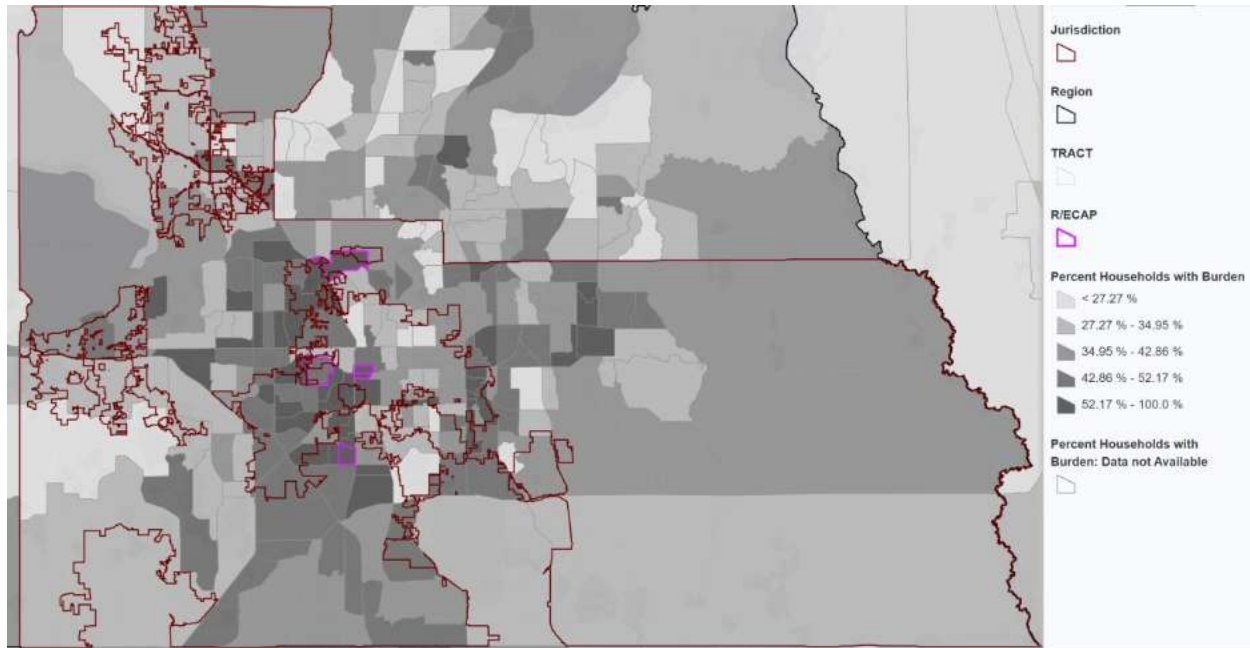
If so, what economic development initiatives are you undertaking that may be coordinated with the Consolidated Plan? If not, describe other local/regional plans or initiatives that impact economic growth.

The use of CDBG funds for job training and job placement services advances the CEDS goals related to workforce development. Another objective of the CEDS is to support neighborhood revitalization and walkability, which will be advanced through the use of CDBG funds to support the development and rehabilitation of affordable housing.

MA-50 Needs and Market Analysis Discussion

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

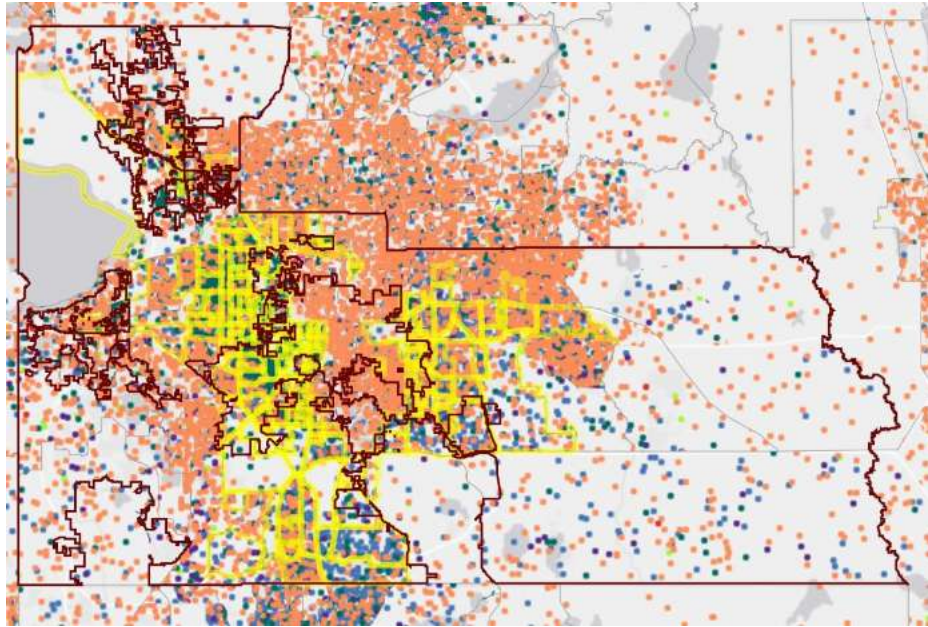
HUD defines four types of housing problems: (1) cost burden of more than 30%, (2) more than 1 person per room, (3) lack of complete kitchen facilities, and (4) lack of complete plumbing facilities. The following HUD-provided map shows the share of households within each census tract that have least one of these housing problems.



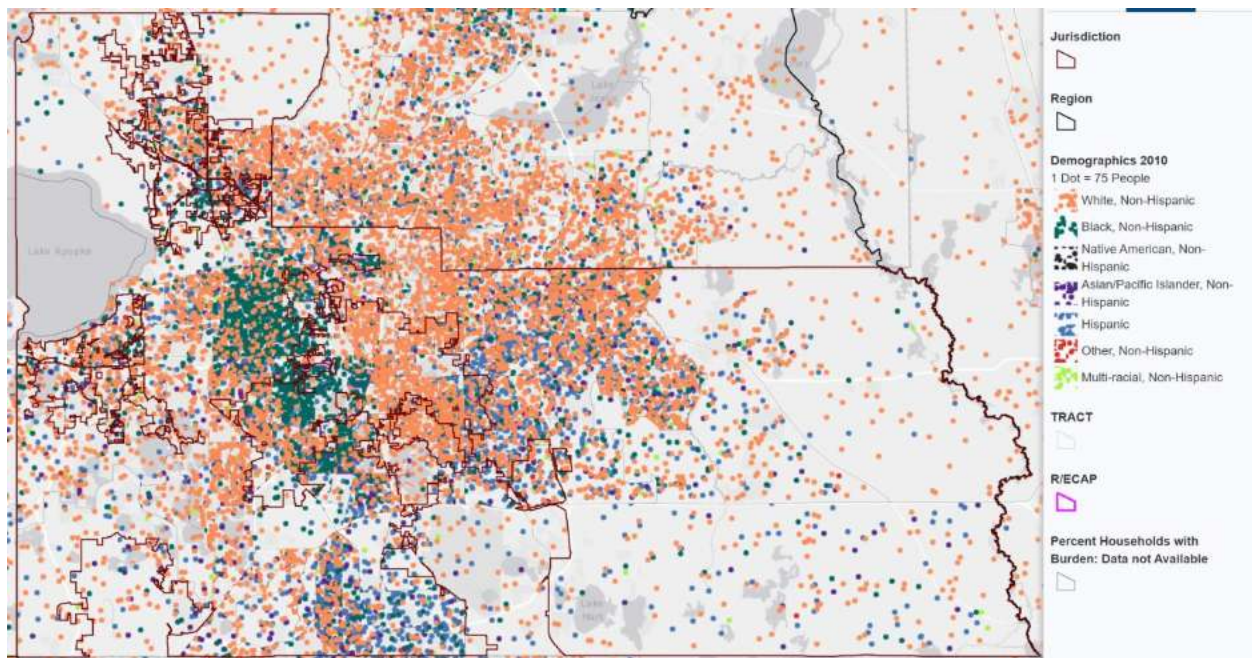
A concentration of households with housing needs is defined as a census tract where more than 40% of households have at least one housing need. In Orange County, 85 census tracts meet these criteria, with the highest concentration of need existing near the Holden Heights neighborhood in central Orange County which reports 73.12% of households with at least one housing problem. 41.35% of households in the County as a whole report having at least one HUD defined housing need. As depicted in the HUD AFFH map, Orange County has a cluster of high-concentration tracts near the center of the County, with tracts to the east and west tending to have a lower concentration of housing problems.

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

Geographic patterns for racial or ethnic minorities residing in Orange County are shown in the HUD AFFH map on the following page. Concentration is defined as a census tract in which more than 50% of residents are people of color. Orange County contains 158 census tracts meeting this definition, the majority of which are concentrated in the center of the County. The following image shows census tracts where more than 50% of residents are people of color highlighted in yellow.



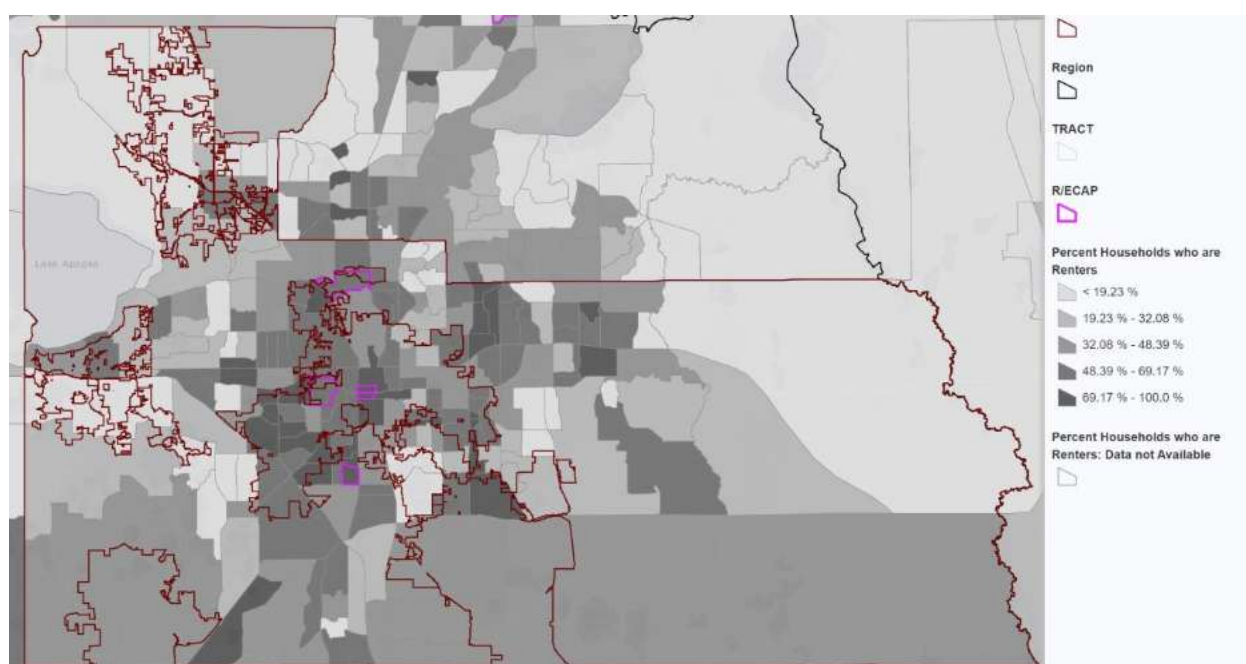
Tracts with minority concentrations are predominantly populated by Black or African American residents, with Hispanic residents comprising the highest populations in other minority concentrated tracts. As shown below, tracts with primarily Black residents are generally concentrated in west central Orange County, while tracts with predominantly Hispanic residents are primarily concentrated in east, east central, and south Orange County.



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

Comparison of HUD AFFH maps on previous pages showing (1) cost burdened households and (2) census tracts with concentrations of minority residents show that there is significant overlap between these two factors, indicating that minority neighborhoods are more likely to experience cost burden and other housing issues. Orange County contains only two tracts near Lake Mann where 50% or more of the housing stock is accessible to residents making 50% or less HAMFI. In contrast, 85 tracts report at least one negative housing condition, primarily cost burden.

As depicted below, HUD AFFH data also shows that tracts with minority concentrations are more likely to have a higher number of renter occupied households. Areas designated as Racially or Ethnically Concentrated Areas of Poverty, or R/ECAPs, are particularly likely to have a high population of renter households. Orange County contains five such areas, all located in the center of the County.



Are there any community assets in these areas/neighborhoods?

As previously discussed, neighborhoods with high concentrations of minority residents are typically clustered in the center of the County, offering them easy access to highways. Many of these areas are also in or near the City of Orlando, and this proximity may be attractive to prospective residents. Neighborhoods with minority concentrations also often hold cultural significance and history that may not be present in majority-white neighborhoods.

In the previously mentioned Holden Heights neighborhood, ACS data shows that a combined total of 45.6% of workers work in education, healthcare, arts and entertainment, or retail, indicating that the area already has schools, medical facilities, shopping, and entertainment within a reasonable distance, notably including Orange Blossom Shopping Center. The area also has several public, private, and charter schools.

Are there other strategic opportunities in any of these areas?

Holden Heights has been designated as an Opportunity Zone by the City of Orlando, so while Orange County cannot directly participate in the development of this jurisdiction, the County may benefit from the proximity of development to neighborhoods within the jurisdiction of the County. The City of Orlando mentions the following activities currently in progress in Holden Heights²³:

- HubZone Program - the U.S. Small Business Administration limits competition for contracts to businesses in historically underutilized business zones.
- Urban Job Tax Credit Program (UJTCP) - endorsed by the Florida Legislature to encourage the creation of jobs in urban areas of the state.
- Community Redevelopment Agencies (CRA) - Holden Heights is located within the City of Orlando's Orange Blossom Trail CRA boundaries.
- The Orlando Economic Enhancement District Program (OEED) - a State of Florida economic development tool engaging redevelopment of properties by businesses and property owners.

²³ [Holden Heights Opportunity Zone - City of Orlando](#)

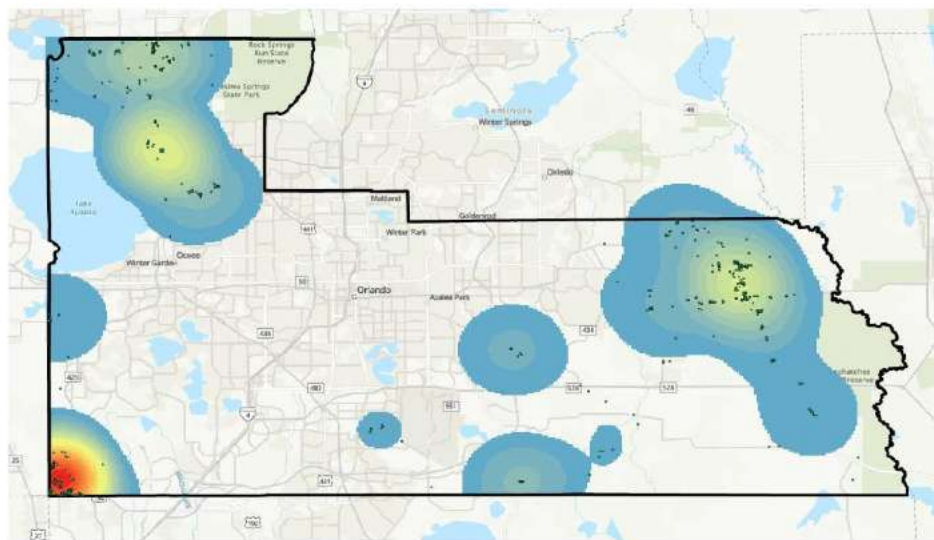
MA-60 Broadband Needs of Housing occupied by Low- and Moderate-Income Households - 91.210(a)(4), 91.310(a)(2)

Describe the need for broadband wiring and connections for households, including low- and moderate-income households and neighborhoods.

Broadband connectivity is a vital resource that provides citizens with access to employment, education and other personal enrichment opportunities found through the internet. Disparities in broadband access – particularly for low-to-moderate income households – can create a “digital divide” that limits personal and professional opportunities. In 2015, the FCC defined broadband as internet access with download speeds of the 25 Megabits per second (Mbps) and upload speeds of 3 Mbps (otherwise notated as 25/3). With broadband access, internet users can partake in hybrid/remote work, video streaming, as well as accessing telehealth, educational, and other resources necessary for modern connectivity.

Orange County produces its own local broadband maps, such as the map shown below in Figure 1. This map, which explores the availability of fiber infrastructure in the county, indicates that the greatest need for fiber infrastructure is found in Four Corners in the southwest corner of the county. Other areas with a need for fiber infrastructure include northwest Orange, in cities such as Apopka, and in the northeastern corner of the county in rural areas such as Bithlo and Christmas.

Figure 1. Orange County Fiber Infrastructure



Data from: Ookla, April 2022

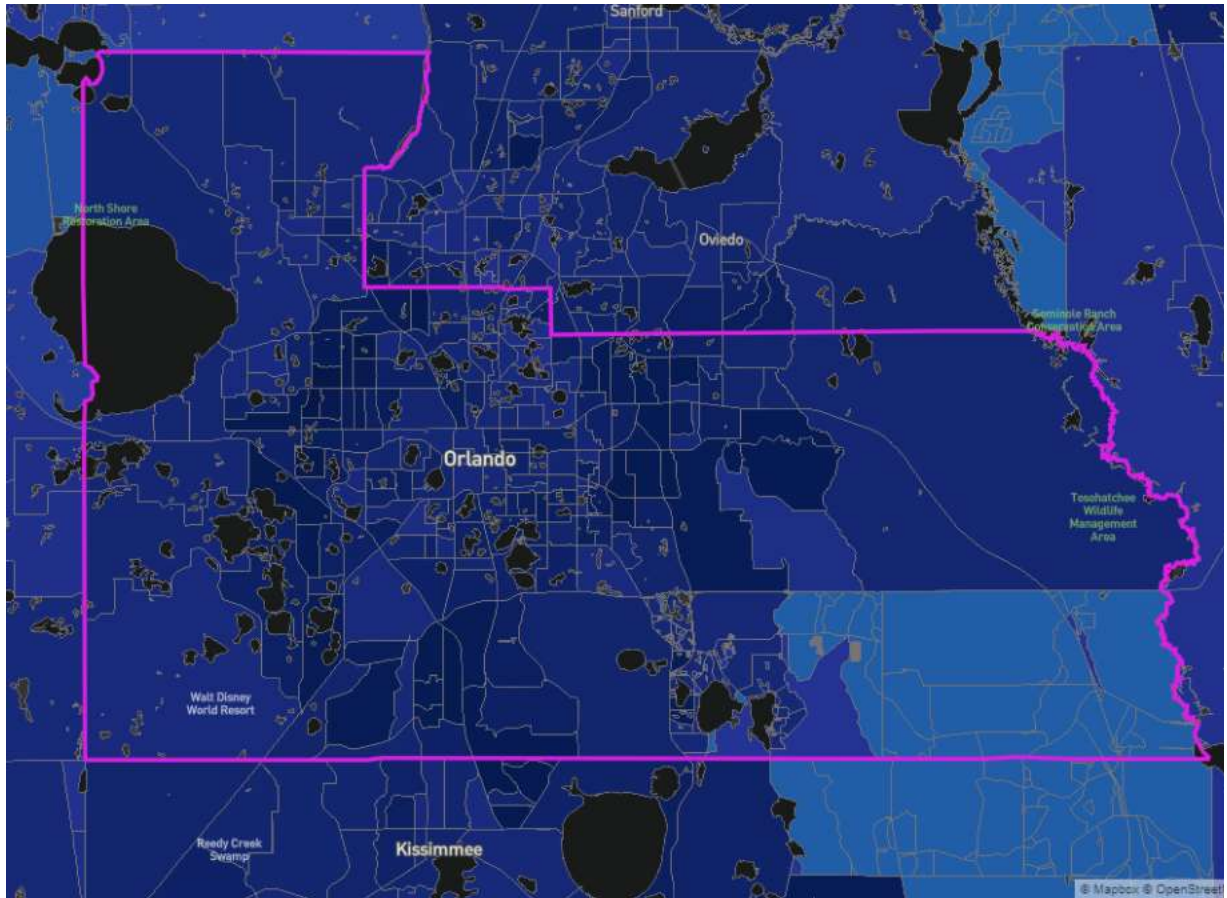
Data Source: Orange County, Office of Innovation and Emerging Technologies

Another source for broadband data is the FCC Broadband Map, whose data is reflected in Figure 2 below. The FCC collects self-reported data from internet service providers, including the location served and technology provided in each census block. Many sources have criticized this FCC data, noting that any census block with at least one residential or business broadband consumer is identified as a census block that is being “served.”²⁴ However, the map remains a useful tool for identifying the number and general location of internet service providers. The FCC Broadband Map indicates that, except for nature reserves, parks and major utilities, all Orange County residents are served with broadband internet. However, the FCC map indicates wide variation in the number of providers and technologies available across the county. Areas such as Alafaya in eastern Orange County are shown as having access to several technologies (e.g., fiber, cable, fixed wireless, ADSL, satellite), as well as many providers offering internet at broadband speeds. Comparatively, low-income areas in Apopka and Winter Garden in west Orange County and in Winter Park and Golden Rod north of Orlando lack access fiber or copper-wired (DSL) technologies. Instead, these areas must rely on only two broadband technologies: fixed wireless and satellite internet (see Figure 3).

Participants in the public engagement process noted that greater access to supplementary resources would also increase access to broadband. Areas for additional supplementary resources include technology upgrades and computer labs for seniors and persons with disabilities, as well as digital and broadband literacy campaigns targeting these populations. An additional suggestion was free public Wi-Fi to reduce fixed costs for low-income renters and homeowners. Orange County collected data which found that more than 18,000 families/individuals need mobile devices and data plans to access the internet. In response, the county has set aside funding to provide devices and data plans for at least 3,000 families, households or individuals.

²⁴ FCC. “About.” Fixed Broadband Deployment. <https://broadbandmap.fcc.gov/#/about>

Figure 2. FCC Broadband Map



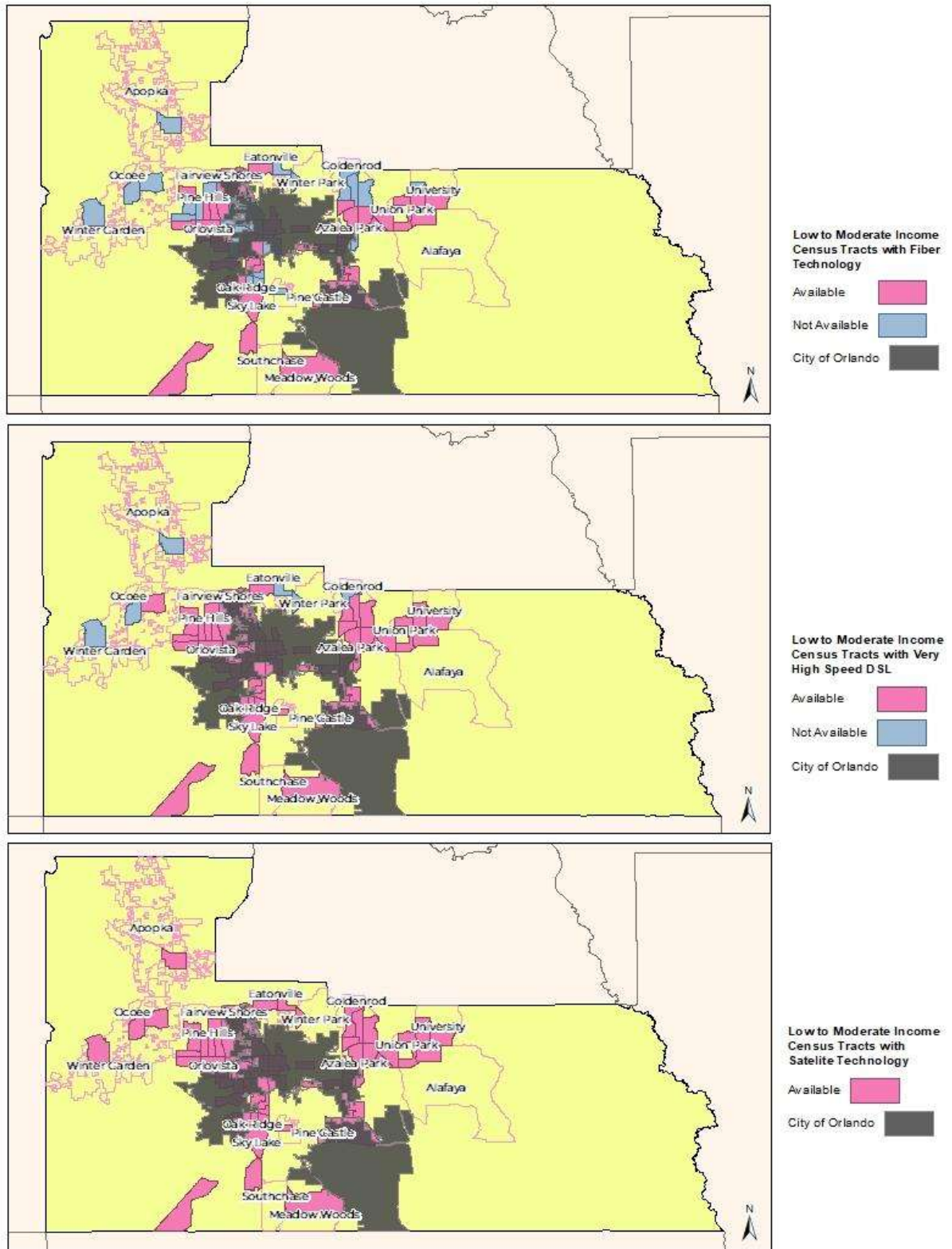
Orange County, FL

Number of Fixed Residential Broadband Providers



Data Source: FCC Fixed Broadband Deployment Map, <https://broadbandmap.fcc.gov/>

Figure 3. Fixed Broadband Deployment in Low to Moderate Income Census Tracts, 2020



Source: Fixed Broadband Deployment Data from FCC Form 477, released 12/2020

Describe the need for increased competition by having more than one broadband Internet service provider serve the jurisdiction.

Several internet technologies are available in Orange County at broadband speeds, including fiber, cable, fixed wireless and satellite. Fiber is offered by Lumen Technologies and AT&T, both in select locations throughout the county. Cable internet is offered at broadband speeds by Charter Communications and Comcast. ADSL is offered by Lumen Technologies and AT&T. Fixed Wireless is offered by Brevard Wireless and T-Mobile. Satellite internet is offered by ViaSat and Hughes Network Systems. Despite the number of internet service providers in Orange County, many parcels – particularly in western Orange County - indicate that there is only one consistent provider for each technology, revealing that additional providers in the region may help to increase broadband access.

MA-65 Hazard Mitigation - 91.210(a)(5), 91.310(a)(3)

Describe the jurisdiction’s increased natural hazard risks associated with climate change.

Climate-related natural hazards have a significant and growing effect on low- and moderate-income families and their homes. Addressing these risks is an important task for County staff, as well as housing and service providers in Orange County. According to the 2013 Comprehensive Emergency Management Plan (CEMP), the County has a high probability of two climate-related hazards: extreme temperatures and intense storms. Extreme Temperatures are likely to affect the County’s entire population (100%). The CEMP describes a “heat wave” as three or more consecutive days where the maximum shade temperature reached or exceeded 90 degrees F. Extreme cold temperatures are described as nights where the temperature falls below 40 degrees Fahrenheit. Extreme temperatures are noted to have a severe effect on the County’s homeless population, but may also affect other vulnerable, low-income populations such as the elderly.

Intense storms also affect 100% of the County’s population. As ocean temperatures continue to rise due to climate change, the intensity of storms is also expected to increase. Hurricanes pose a threat to Orange County, particularly hurricane-related high winds, flooding (due to rain), and hurricane-spawned tornadoes.”²⁵ Hurricanes of lower intensity, as well as tropical storms and depressions are most common in the County. The CEMP notes that persons with disabilities are most vulnerable during Category 1 hurricanes. All at-risk groups, including minorities, elderly persons, persons with disabilities, families living at or below the poverty level, limited English speakers, and single parent households, are at much greater risk during Category 2 hurricanes.

Tornadoes occur frequently in Orange County and follow an unpredictable pattern, which raises their risk level for Orange County residents. The CEMP notes that residents are particularly

²⁵ Orange County, “Comprehensive Emergency Management Plan,” p. 17

vulnerable to tornadoes due to the high number of families living in mobile or manufactured homes in areas like Lake Buena Vista, the large number of trees in cities like Belle Isle, and in the City or Winter Park due to its location in east Orange County where it is vulnerable to higher wind speeds. Lastly, thunderstorms and lightning can affect all jurisdictions, with lightning strikes being identified as a major threat to all structure types, including residences.

Another hazard that can impose a severe impact in Orange County is wildfires. Wildfires are most hazardous in undeveloped portions of the County, including the Christmas/Bithlo area, North and Southwestern Orange County, and the Four Corners area. Vulnerable incorporated areas include Apopka, Orlando, Lake Buena Vista, Oakland, Winter Garden and Bay Lake.

Describe the vulnerability to these risks of housing occupied by low- and moderate-income households based on an analysis of data, findings, and methods.

A 2022 Orange County report entitled “Housing Asset and Resilient Policy” (HARP) warns that low to moderate income households are disproportionately negatively affected by natural disasters.²⁶ Intense storms and subsequent flooding pose a severe threat to housing occupied by low- to moderate-income households. For example, a large share of Orange County residents live in modular or mobile homes, which increases their vulnerability to intense storms with high winds. Homes that become flooded during storms, those without flood insurance or those who are underinsured are also highly affected, especially if the homeowner also experiences employment or other personal losses.²⁷ Homeowners with substantially damaged properties will have additional costs in order to bring their property up to code. The HARP report urges the county to “prioritize flood mitigation projects in low- to moderate-income areas where the infrastructure and housing stock is most vulnerable.”²⁸ Finally, with the county’s high probability of extreme temperatures, low- and moderate-income households can expect to pay rising energy costs, and households will require working HVAC, particularly during hotter months, to help vulnerable residents keep their homes cool.

²⁶ Orange County. (May 2022) “Housing Asset and Resilient Policy (HARP) Methodology and Recommendations Report.” p. 132

²⁷ Orange County. (2013) “Comprehensive Emergency Management Plan.” p. 23

²⁸ “HARP,” p. 16

STRATEGIC PLAN

SP-05 Overview

Strategic Plan Overview

This strategic plan will guide the allocation of Orange County's CDBG, HOME and ESG funding during the 2022-2026 planning period. Goals for the 2022-2026 period focus on high priority needs identified through data analysis, community input, consultation with County staff and partner agencies, and a review of relevant recently completed plans and studies. The priority and goal sections of this strategic plan describe anticipated activities within each of several broader areas to which the County will allocate funding. The County will rely on partnerships with local agencies and internal County departments to achieve its Consolidated Plan goals and address priority needs.

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

Geographic Area

The Orange County HUD entitlement jurisdiction includes unincorporated Orange County and the cooperating cities of Apopka, Maitland, Ocoee and Winter Park.

Table 49 - Geographic Priority Areas

Target Area	Percentage of Funds
Countywide	100%

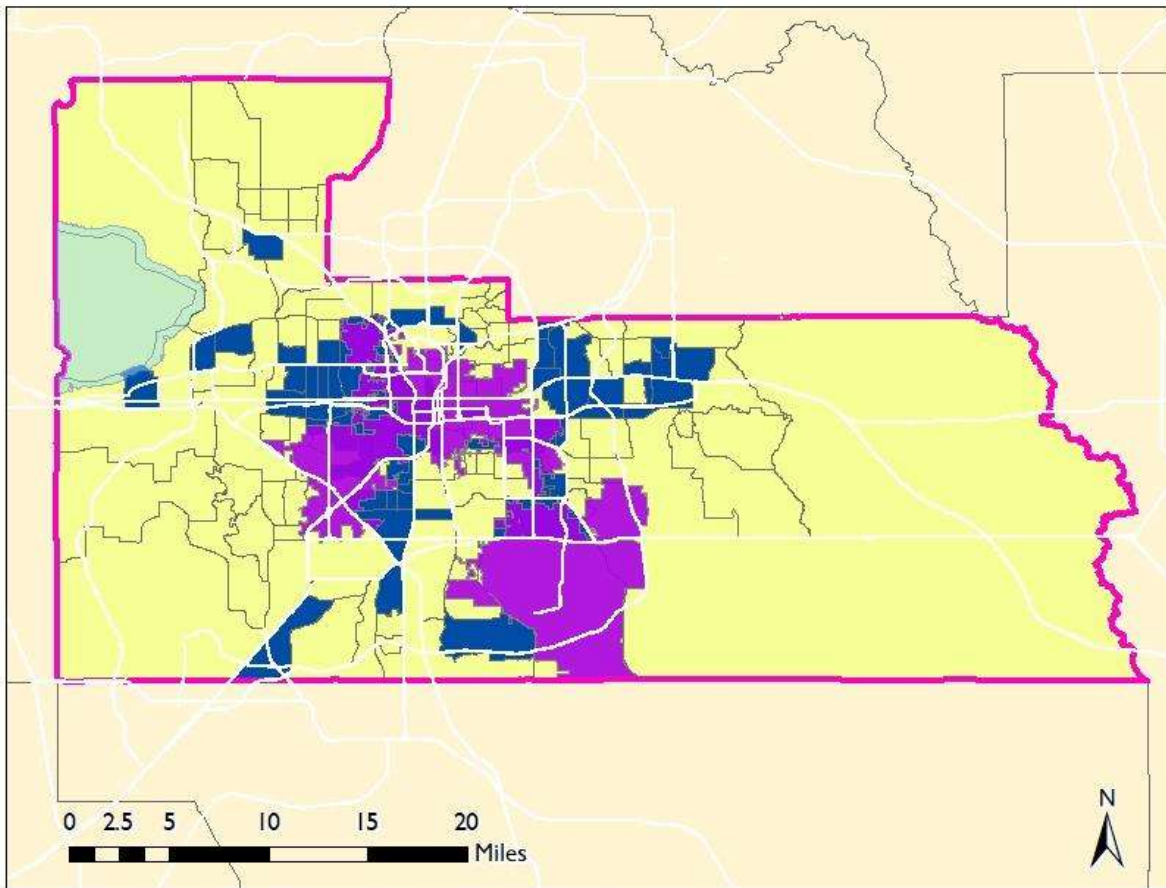
General Allocation Priorities

Each year, the County will select projects and activities that meet the priorities and goals identified in the Consolidated Plan. This process will utilize a variety of methods to select projects, such as consultation with County staff and current subrecipients, implementation of other standing County plans, and formal Requests for Proposals. Projects and activities must best meet priority needs based on project eligibility, availability of funds, number of anticipated beneficiaries served, and readiness to proceed. The County does not identify target areas for the use of HUD grant funds.

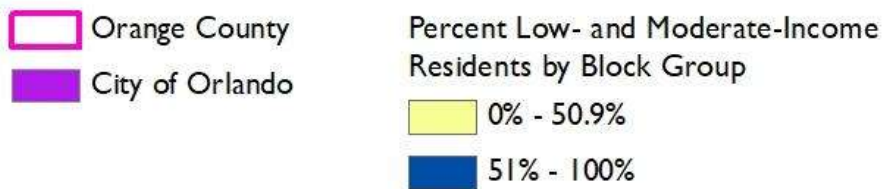
Describe the basis for allocating investments geographically within the jurisdiction (or within the EMSA for HOPWA)

Each year, the County strives to fund projects that serve areas with the greatest need, as determined by factors such as percentage of low- and moderate-income population, substandard housing stock, and need for other improvements. Additionally, the County funds projects that address priority needs of income-eligible households and special needs populations living throughout Orange County. Figure 4 identifies low- and moderate-income block groups (51% or more low- and moderate-income population) in Orange County.

Figure 4. Low and Moderate Income Block Groups in Orange County, 2020



Source: 2011-2015 American Community Survey (updated June 2020)



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

Priority Needs

During the development of the Consolidated Plan, five priority needs were identified. Each of the needs is described in the table that follows along with a basis for its priority designation and the populations to be served. Priority needs include housing affordability and condition, capital improvements, public services, homeless needs, and program administration.

Table 50 – Priority Needs Summary

Priority Need		Housing Affordability and Condition
1	Priority level	High
	Population(s) served	Extremely low income Low income Moderate income Large family Families with children Elderly/frail elderly Public housing residents People with disabilities
	Geographic area(s) affected	Countywide
	Associated goal(s)	Expand and preserve housing affordability, safety, and stability for low to moderate-income households and vulnerable populations
	Description	Activities to be funded under this priority may include, but are not limited to: <ul style="list-style-type: none"> • Homeownership Opportunities • Housing Rehabilitation • Energy Efficient /Hurricane resistant housing • Affordable Housing preservation • Rental assistance • Subsidized housing units • Housing construction for affordable housing • Healthy homes • Land acquisition for affordable housing/Land banking • Community land trusts • Multifamily development • Senior housing/housing for vulnerable population groups • Public services related to housing stability (i.e. crisis intervention, meals on wheels for seniors, affordable childcare for working households, legal assistance, etc.)

	Basis for priority	CHAS data analyzed for this Plan indicates that Orange County is severely lacking in housing for renters below 50% AMI. Further, nearly three-quarters of Orange County's existing housing stock is over 20 years old, with around 30% constructed before 1980, making it likely to need maintenance and repair. Community engagement conducted for this Plan strongly underscores these findings.
	Priority need	Capital Improvements
	Priority level	High
	Population(s) served	Extremely low income Low income Moderate income Families with children Elderly People with disabilities Non-housing community development
2	Geographic area(s) affected	Countywide
	Associated goal(s)	Transform low to moderate-income communities into resilient communities
	Description	Activities to possibly be funded under this priority include: <ul style="list-style-type: none"> • Infrastructure projects • Public facilities • Technology and broadband opportunities • Safety and livability • Livable environment for persons with disabilities
	Basis for priority	Orange County's capital improvement needs were determined based on input from residents and stakeholders engaged through focus groups and neighborhood meetings.
	Priority need	Public Services
	Priority level	High
3	Population(s) served	Extremely low income Low income Moderate income Families with children Elderly People with disabilities Homeless individuals and families Victims of domestic violence

	Geographic area(s) affected	Countywide
	Associated goal(s)	Transform low to moderate-income communities into resilient communities
	Description	Activities to possibly be funded under this priority include: <ul style="list-style-type: none"> • Case management and crisis intervention • Services for homeless individuals and families (that are not covered by ESG funding) • Childcare and after school services • Independent living assistance for the elderly and disabled • Meals on Wheels • Job training and job placement services • Housing stability and wraparound services
	Basis for priority	Orange County's public services needs were determined through consultation with other Orange County departments and divisions and other nonprofit representatives. Input from residents who were engaged in neighborhood meetings reinforced the need for enhanced and expanded social services within the community.
4	Priority need	Homeless Services
	Priority level	High
	Population(s) served	Chronic homelessness Homeless Individuals Homeless Families with Children Homeless Persons with Mental Illness Homeless Persons with Chronic Substance Abuse Homeless Veterans Homeless Persons with HIV/AIDS Homeless Victims of Domestic Violence Homeless Unaccompanied Youth
	Geographic area(s) affected	Countywide
	Associated goal(s)	<ul style="list-style-type: none"> • Work in collaboration with local government agencies, nonprofit organizations, and industry partners to eradicate and prevent homelessness • Expand and preserve housing affordability, safety and stability for low to moderate-income households and vulnerable populations
	Description	Activities to possibly be funded under this priority include: <ul style="list-style-type: none"> • Shelter Operations • Renovations to homeless facilities • Rapid Rehousing • HMIS • Street Outreach • Homeless Prevention • Single room occupancy

5		<ul style="list-style-type: none"> Housing vouchers for homeless and at-risk of homelessness populations
	Basis for priority	The need for homeless services was determined by a review of data. The most recent Point in Time Count found over 2,000 persons experiencing homelessness within the CoC's service area, nearly a quarter of whom were unsheltered. CoC planning documents and stakeholder consultations further support the need for services to eradicate and prevent homelessness.
	Priority need	Program Administration
	Priority level	High
	Population(s) served	All
	Geographic area(s) affected	Countywide
	Associated goal(s)	Program Administration
	Description	<ul style="list-style-type: none"> Support general administration, planning, and staff costs for Orange County's CDBG, HOME and ESG programs.
	Basis for priority	Program administration costs associated with the coordination and delivery of services to Orange County residents.

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

Influence of Market Conditions

Table 51 – 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)	<p>Tenant Based Rental Assistance (TBRA) program provides Rental Assistance for Low Income Households who want to rent from a private landlord (that is not a relative). The participant's portion of the rent is a minimum of 30% of their adjusted monthly income. TBRA pays the remainder of the contract rent to the private property landlord.</p> <p>With the sharp rise in rents discussed in section MA-15, TBRA assistance has the potential to be a very valuable and much needed resource for Orange County renters.</p>
TBRA for Non-Homeless Special Needs	<p>As mentioned above, rents have risen extremely rapidly in recent months. This rate of inflation has not been matched by raises in disability benefits. Florida residents on Social Security Disability (SSDI) receive on average \$1,358 per month²⁹. In order to avoid being rent burdened, tenants must spend less than 30% of their household income on rent; therefore, a person on disability can only spend \$407 per month on rent without becoming rent burdened. As discussed in section MA-15, the average rent in Orange County as of 2022 was ~\$2,100; even low HOME rent for a studio unit was \$607, which would be 45% of the income of the average person on SSDI. From this data, it is clear that rental assistance for residents with disabilities or other special needs is crucial.</p>
New Unit Production	<p>Orange County contains significantly fewer subsidized units than it does residents in need of low-cost housing. Production of additional LIHTC units could be beneficial, especially as the County stands to lose some units in the coming years as discussed in section MA-10. LIHTC units are generally large multi-family units that can increase density and walkability, which may be useful in low-income neighborhoods with few housing options.</p>

²⁹ [Your Guide to Florida Disability Benefits: Qualify & 2022 Pay Amounts \(disabilityapprovalguide.com\)](https://disabilityapprovalguide.com/)

Affordable Housing Type	Market Characteristics that will influence the use of funds available for housing type
Rehabilitation	As discussed in section MA-50, low-income and minority-concentrated neighborhoods in Orange County are more likely to have housing units with more than one of four HUD-Defined Housing Issues. These issues are: (1) cost burden of more than 30%, (2) more than 1 person per room, (3) lack of complete kitchen facilities, and (4) lack of complete plumbing facilities. In housing units with problems 3 and 4, funding for rehabilitation has the potential to create more housing options without new construction and in ways that are minimally invasive to existing communities.
Acquisition, including preservation	Section MA-20 shows that Orange County has 16,204 vacant homeowner units and 61,695 vacant rental units, for a total of 77,899 vacant units. These represent 14% of all housing units in Orange County. Acquisition of vacant units to convert to low-income or subsidized housing is a potential solution to a lack of affordable housing; however, it would require significant funding and a specialized program, which may be less desirable than options listed above.

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

Introduction

Orange County is eligible to receive funding from three CPD formula grants (CDBG, HOME, and ESG). Combined, the County will receive an anticipated \$11,062,263 in HUD grant funds for the 2022 program year. The County also administers additional federal, state, and local funds that extend or complement the activities funded by CDBG, HOME, and ESG. The table below outlines anticipated funding levels by program.

Anticipated Resources

Table 52 - Anticipated Resources

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
CDBG	Public - Federal	Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services	\$7,278,950	\$0	\$0	\$7,278,950	\$29,115,800	Anticipated CDBG funding includes entitlement grant funds, program income, and prior year resources. The expected amount available for the remainder of the Con Plan is four times the 2022 annual allocation.

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
HOME	Public – Federal	Acquisition Homebuyer assistance Homeowner rehab Multifamily rental new construction Multifamily rental rehab New construction for ownership TBRA	\$3,145,072	\$0	\$0	\$3,145,072	\$12,580,288	Anticipated HOME funding includes entitlement grant funds, program income, and prior year resources. The expected amount available for the remainder of the Con Plan is four times the 2022 annual allocation.

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
ESG	Public – Federal	Conversion and rehab for transitional housing Financial Assistance Overnight shelter Rapid re-housing (rental assistance) Rental Assistance Services Transitional housing	\$638,241	N/A	\$15,000	\$653,241	\$2,552,964	Anticipated ESG funding includes entitlement grant funds and prior year resources. The expected amount available for the remainder of the Con Plan is four times the 2022 annual allocation.

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
General Fund	Public - Local	Acquisition Homebuyer assistance Homeowner rehab Housing Multifamily rental new construction Multifamily rental rehab New construction for ownership Rapid re-housing (rental assistance)	\$20,000,000	N/A	N/A	\$20,000,000	\$67,948,881	Orange County's Affordable Housing Trust Fund is capitalized using annual contributions of general revenue dollars.
Section 8	Public - Federal	Admin and Planning Rental Assistance Other	\$ 13,459,368	N/A	N/A	\$ 13,459,368	\$53,837,472	The County's Section 8 program, combined with 65 HUD-VASH vouchers, provides rental assistance covering a total of 1,328 housing units.

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
Shelter Plus Care	Public – Federal	Housing Rental Assistance	\$978,513	N/A	N/A	\$978,513	\$3,914,052	On behalf of the Central Florida Continuum of Care, Orange County administers 63 S+C vouchers providing housing for chronically homeless individuals with disabilities.

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
Other (Emergency Housing Vouchers)	Public - Federal	Rental Assistance	\$727,294	N/A	N/A	\$727,294	\$2,909,176	The County administers 65 Section 8 Mainstream vouchers targeted to non-elderly households with disabilities. The County also administers 66 Emergency housing Vouchers for homeless households and persons fleeing domestic violence and human trafficking.

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
Other (SHIP)	Public - State	Acquisition Admin and Planning Homebuyer assistance Homeowner rehab Housing Multifamily rental new construction Multifamily rental rehab New construction for ownership Rapid re-housing (rental assistance) Other	\$10,945,247	N/A	N/A	\$10,945,247	\$25,000,000	Florida's State Housing Initiatives Partnership (SHIP) Program provides funding for the County to produce and preserve affordable homeownership and rental housing.

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

The HOME program requires a 25% non-Federal match of the total grant amount (minus administration costs) for eligible HOME activities. Orange County will continue to use State Housing Initiatives Partnership (SHIP) Program funds to provide the match needed. In recent years, the County's allocation of SHIP funds has been more than sufficient to meet the HOME program's 25% match requirement.

The Emergency Solutions Grant regulations require a 100% match for every dollar of ESG funds allocated. ESG match requirements are met by counting non-federal funds and resources contributed by ESG-funded agencies toward programs and activities supported with the ESG funds. The County ensures the matching requirements for all ESG subrecipients are in order prior to the commitment of ESG funds and includes the match requirements as part of the project administration agreements Orange County enters into with all ESG-funded agencies. The sources of match and necessary back-up documentation are reviewed as part of monthly reimbursement requests submitted by the agencies and further discussed during the annual on-site monitoring visits and technical assistance meetings (as needed). Newly funded agencies are made aware of the matching requirements during the post-ward technical assistance sessions held by the Housing and Community Development Division staff. Administration funds utilized under ESG (up to 7.5% of the total allocation) will be matched by the County.

Housing affordability is a high priority need in Orange County and the County will continue to make use of significant opportunities to leverage other fund sources in order to meet the need. The State of Florida's SHIP funds supply a substantial source of revenue, in addition to Consolidated Plan resources, for qualified housing activities. The County uses SHIP funds primarily to provide affordable housing, with a portion designated for a pilot rapid re-housing program administered by Coalition for the Homeless of Central Florida, Inc. Additionally, the County's local Affordable Housing Trust Fund, which was established in 2020 as an outgrowth of the Housing for All 10-Year Action Plan, will be capitalized with an expected \$160 million over ten years from general revenue dollars. This funding will help advance production and preservation of affordable housing units in Orange County and adds significant leverage and additional resources to the strategies identified in the Consolidated Plan.

To further the goal of preventing and eliminating homelessness, the County remains one of the largest funders of homeless services in the region. Besides funding bridge housing, transitional housing, and permanent supportive housing units, the County allocates \$1.55M in general revenue funds annually for rapid re-housing of homeless families, and \$650,000 for the Diversion Program implemented by the Coalition for the Homeless of Central Florida. Additionally, the County contributes \$100,000 annually to cover operational expenses at the Samaritan Resource Center, a daily drop-in center for homeless individuals located in East Orange County.

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

The Housing and Community Development Division will continue its ongoing coordination with Orange County's Real Estate Management Division to conduct regular assessments of surplus County-owned properties suitable for residential development. Nearly 50 such properties have been identified since 2020 and transferred to nonprofits for development of affordable housing. The involvement of the County's Planning, Utilities and Development Engineering Divisions and local Affordable Housing Trust Fund resources have been instrumental in past efforts to use publicly-owned land and/or acquired property for affordable housing development. This coordination will help address the housing goal of the County's Consolidated Plan and aid in implementing recommendations of the *Housing for All 10-Year Action Plan*.

Discussion

Formula grants under the Consolidated Plan are noncompetitive awards allocated to the County based on a predetermined HUD formula. These grants include the following three programs, listed here with the amount of federal funding allocated for the 2022 program year, the first of five years covered by this plan:

- Community Development Block Grant (CDBG): \$7,278,950
- HOME Investment Partnerships Program (HOME): \$3,145,072
- Emergency Solutions Grants (ESG): \$638,241

Orange County also administers the Housing Choice Voucher Program (Section 8) under which approximately \$13 million is used annually to provide rental subsidies to 1,263 low-income households in the County. In addition, the Housing and Community Development Division administers 65 HUD-VASH rental vouchers for veterans and 670 out-of-state vouchers from the HUD Section 8 portability program. Another 65 Section 8 Mainstream Vouchers are administered by the County to provide rental assistance to non-elderly persons with disabilities. Furthermore, Shelter Plus Care (S+C) funding in the amount of \$978,000 is used to help chronically homeless individuals with permanent housing and supportive services.

Florida's State Housing Initiatives Partnership (SHIP) program allocation, along with remaining prior year funds and program income, are generally targeted to affordable housing development, down payment assistance, affordable housing preservation and pre-purchase housing counseling, as well as a pilot rapid re-housing program and impact fee subsidies for new developments.

Some CDBG and HOME activities generate program income, which is income the County receives as a direct result of its CDBG and HOME-funded investments. All program income received is entered into IDIS and drawn before any program funds.

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.

Agencies and organizations through which Orange County will carry out its Consolidated Plan are shown in Table 53. In addition to those listed in the table, the County will rely on a variety of non-profit and private sector subrecipients, service providers, and housing developers, including Low Income Housing Tax Credit developers, and many others.

Table 53 - Institutional Delivery Structure

Responsible Entity	Responsible Entity Type	Role	Geographic Area Served
Orange County	Government	Planning Homelessness Non-homeless special needs Affordable Housing - Ownership, Rental Public Housing Neighborhood Improvements Public Facilities Public Services	Jurisdiction
Homeless Services Network of Central Florida	Continuum of Care	Homelessness	Region
Orlando Housing Authority	PHA	Public Housing	Jurisdiction
Winter Park Housing Authority	PHA	Public Housing	Jurisdiction
HANDS of Central Florida, Inc.	CHDO	Affordable Housing - Ownership, Rental	Jurisdiction
Orlando Neighborhood Improvement Corporation	CHDO	Affordable Housing - Ownership, Rental	Jurisdiction
City of Apopka	Government	Neighborhood Improvements Public Facilities	Jurisdiction
City of Maitland	Government	Neighborhood Improvements Public Facilities	Jurisdiction
City of Ocoee	Government	Neighborhood Improvements Public Facilities	Jurisdiction
City of Winter Park	Government	Neighborhood Improvements Public Facilities	Jurisdiction

Responsible Entity	Responsible Entity Type	Role	Geographic Area Served
City of Orlando	Government	Homelessness Neighborhood Improvements Public Facilities	Jurisdiction

Assess of Strengths and Gaps in the Institutional Delivery System

Orange County's Housing and Community Development Division coordinates efforts with a broad network of organizations throughout the County and across the Central Florida region. The varied strengths, expertise, and resources of these diverse partners help to create a robust and comprehensive system for delivering assistance to low- and moderate-income residents. These programs and services range from public assistance programs operated by state and local agencies to improved parks and recreation facilities in disinvested neighborhoods, construction and rehabilitation of affordable housing units, childcare vouchers for working families, case management for people experiencing homelessness, and a great many more. The depth and diversity of partners making up this network is a key strength of the local service delivery system.

Public agencies, for-profit and non-profit private organizations all play a part in the provision of affordable housing, social services, capital improvements, and economic development. However, ongoing needs for staffing capacity and financial resources is a constant challenge. By coordinating between agencies and local organizations, the County helps to create a more comprehensive network of services and programs for its residents while reducing duplication and making efficient use of limited financial resources.

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

Table 54 - Homeless Prevention Services Summary

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	X	X
Mortgage Assistance			
Rental Assistance	X	X	X
Utilities Assistance	X		
Street Outreach Services			
Law Enforcement	X		
Mobile Clinics		X	
Other Street Outreach Services		X	X

Supportive Services			
Alcohol & Drug Abuse	X	X	X
Child Care	X	X	X
Education	X	X	X
Employment and Employment Training	X	X	X
Healthcare	X	X	X
HIV/AIDS			X
Life Skills	X	X	X
Mental Health Counseling	X	X	X
Transportation			
Other			
Other			

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)

As lead agency for the Orlando/Orange, Osceola, Seminole Counties CoC, the Homeless Services Network of Central Florida (HSN) maintains a Coordinated Entry System (CES) to prioritize services to those most in need. The Homeless Outreach Partnership Effort (H.O.P.E.) team operated by the Health Care Center for the Homeless provides outreach services in Orange County. The H.O.P.E. team is made up of outreach specialists, mental health and medical providers, and others who work to build trust with residents experiencing homelessness, assess their needs and eligibility, and connect residents to services, such as transportation assistance and housing navigation. Orange County will continue to use local and federal funding to support operations, maintenance, and programming at local emergency shelters and transitional housing facilities.

The Continuum of Care uses the Housing First approach to ending homelessness, which prioritizes providing permanent housing to people experiencing homelessness before attending to anything less critical, such as getting a job, budgeting, or addressing substance abuse issues. The Continuum of Care's permanent supportive housing (PSH) programs, which include wrap around services, are key to keeping formerly homeless persons in housing. The County utilizes federal Shelter Plus Care funding to provide permanent supportive housing for people with disabilities.

Over the next five years, the County anticipates allocating its annual ESG funding to several categories focused on meeting housing needs: emergency shelter, rapid rehousing, and homelessness prevention. Specific activities that may be funded will include financial assistance to help pay for housing or services designed to help people obtain or maintain housing. In all cases, assistance will be focused on housing stabilization, linking program participants to community resources and mainstream benefits, and helping participants develop a plan for preventing future housing instability.

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

The centralized, professionally managed Homeless Management Information System (HMIS), data-driven Coordinated Entry System, and the Housing First approach implemented by the Central Florida region's Continuum of Care and assisted by Orange County ESG funding have resulted in an extremely effective and well-coordinated effort to end homelessness. With the Homeless Services Network of Central Florida serving as the Continuum of Care's lead agency, Central Florida has attracted significant federal, state, and local funding to support its regional plan to end homelessness. By shifting focus from an earlier "housing-readiness" model to a data-driven, best-practice "housing first" model, the CoC offers interventions that provide housing as the first step in ending homelessness, supported by wrap-around services to help vulnerable residents retain housing.

While this institutional delivery system is generally strong, there are also gaps and opportunities for improvement. In 2017, the Homeless Services Network of Central Florida conducted a review of the gaps, opportunities, and challenges facing the Central Florida Continuum of Care.³⁰ After considering each of the various stages a homeless person or household passes through between becoming homeless and returning to stable housing, the Continuum distilled its three highest priority expansion needs in order to better meet gaps in services. The three highest priority needs, as described in the HSN document, are listed below:³¹

Permanent Supportive Housing for Non-Chronic Families: Current resources are limited to providing Permanent Supportive Housing to households that have been homeless for at least a year. Given the vulnerability that children experience during homeless episodes, the CoC has prioritized identifying resources that will provide permanent subsidy and wrap around services to families unable to stabilize with the time limited supports provided through the region's rapid rehousing projects.

Diversion: Diversion projects have been successful in assisting families who need very limited financial and/or services supports to regain access to stable permanent housing. Diversion projects that target these families are able to cost-effectively redirect newly homeless households back into permanent housing while limiting their involvement in the homeless services system.

Extended Engagement: Individuals who have mental health and/or cognitive impairments may be severely limited in their ability to engage any system of care or support. Most, if not all, of these individuals are eligible for current resources that would provide housing subsidy and wrap around services, while others would qualify for higher levels of care including Adult Living Facilities. Intentional effort at creative forms of outreach is required to effectively engage these highly vulnerable neighbors.

³⁰ Homeless Services Network of Central Florida. *Continuum of Care (CoC) Plan: Gaps, Opportunities and Challenges*, 2017.

³¹ Ibid.

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

The Orange County Housing and Community Development Division works in conjunction with community stakeholders, local and regional public service agencies, neighborhood revitalization organizations and area housing partners to assess community and regional needs and to enhance coordination of community projects and programs. To strengthen the service delivery system and build capacity to fill gaps, Housing and Community Development will continue to seek to broaden these partnerships and find opportunities to partner with new organizations that further deepen the County's community reach and strengthen the community's social service network. Highlighted here are several key activities that the County and partner agencies are undertaking to overcome gaps in the institutional structure and service delivery system:

- The County plans to continue to attend monthly membership meetings with the Central Florida Commission on Homelessness, which helps coordinate services between homeless individuals, homeless providers, and health and mental health organizations. The County also participates annually in the Continuum of Care's Point-in-Time count and will partner with HSN (the CoC's lead agency) to align policies and priorities related to homelessness; in turn, the HSN will help review and score the annual applications for the County's ESG funding.
- The East Central Florida Regional Planning Council is a key partner for coordination on several critical plans, including the East Central Florida 2060 Plan and the East Central Florida Comprehensive Economic Development Strategy (CEDS). Ongoing coordination with the Council will continue to highlight shared goals and opportunities for collaboration throughout the region.
- Internal coordination efforts: Orange County Housing and Community Development Division staff continues to support the Affordable Housing Advisory Board and Community Development Advisory Board, both of which provide vital input on affordable housing and community development issues specific to the County. The staff also collaborates with various Departments and Divisions within the County on issues related to affordable housing and capital improvement and infrastructure projects in low-income areas.

SP-45 Goals Summary – 91.215(a)(4)

Goals Summary Information

Table 55 – Goals Summary

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	Transform low to moderate-income communities into resilient communities	2022	2026	Non-Homeless Special Needs Non-Housing Community Development	Countywide	Capital Improvements Public Services	CDBG: \$11,533,580	Public facility or infrastructure activity other than low/moderate income housing benefit: 39,825 persons assisted Public service activity other than low/moderate income housing benefit: 7,040 persons assisted
2	Expand and preserve housing affordability, safety and stability for low to moderate-income households and vulnerable populations	2022	2026	Affordable Housing Public Housing Homeless Non-Homeless Special Needs	Countywide	Housing Affordability and Condition Homeless Services	CDBG: \$17,582,220 HOME: \$14,152,825 HTF: \$87,948,881 SHIP: \$10,000,000	Homeowner housing rehabilitated: 700 units Homeowner housing added: 200 units Rental units rehabilitated: 745 units Tenant-based rental assistance/Rapid Rehousing 1,000 households assisted
3	Work in collaboration with local government agencies, nonprofit organizations and industry partners to eradicate and prevent homelessness	2022	2026	Homeless	Countywide	Homeless Services Program Administration	ESG: \$3,206,205 SHIP: \$TBD EHV: \$3,636,470	Homelessness prevention: 125 families assisted Homeless person overnight shelter: 5,760 individuals assisted Tenant-based rental assistance/Rapid Rehousing 50 households assisted

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
4	Program Administration	2022	2026	Non-Homeless Special Needs Non-Housing Community Development Affordable Housing Homeless Public Housing	Countywide	Program Administration	CDBG: \$7,278,950 HOME: \$1,572,535	Not applicable

Goal Descriptions

Goal 1: Transform low to moderate-income communities into resilient communities

Capital improvements and infrastructure investments to enhance community safety and livability and to increase accessibility for persons with disabilities; support for services offered by nonprofit organizations and to increase housing stability, provide job training and placement, and meet special needs of vulnerable populations such as children, the elderly, and people with disabilities.

Goal 2: Expand and preserve housing affordability, safety and stability for low to moderate-income households and vulnerable populations

Rehabilitation of rental and homeowner housing to benefit extremely low-, low-, and moderate-income households; tenant-based rental assistance, and CHDO funds to support development of new housing for homeownership.

Goal 3: Work in collaboration with local government agencies, nonprofit organizations, and industry partners to eradicate and prevent homelessness

Provide housing and services for residents experiencing or at-risk of homelessness, including homelessness prevention, case management, wrap-around services, emergency shelter, rapid rehousing, and HMIS support.

Goal 4: Program Administration

Plan and administer funding for community development and housing activities with transparency, community involvement, and full compliance with federal regulations. Provide services to residents and housing providers to advance fair housing.

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)

Orange County is deeply committed to increasing its supply of affordable housing through implementation of the Housing For All 10-Year Action Plan. The goal of the 10-Year Action Plan is to produce or preserve 33,300 housing units in Orange County, of which at least 11,000 will be affordable to very low, low, and moderate-income households. As part of the 10-Year Action Plan, the County established its own Affordable Housing Trust Fund in 2020. Resources from the Trust Fund provide financial leverage for affordable housing production and preservation activities. Through its various Consolidated Plan housing activities, Orange County expects to provide affordable housing for the following numbers of extremely low-income, low-income, and moderate-income families over the 2022-2026 plan period:

- Homeowner housing rehabilitation: 700 families
- New construction of housing for homeowners: 200 families
- Rental housing rehabilitation: 745 families
- Tenant-based rental assistance: 1,000 families

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)

HUD requires that all publicly supported housing developments set aside 5% of all units as accessible units for persons with disabilities. The Orlando Housing Authority (OHA) is currently under an extended Section 504 Voluntary Compliance Agreement (VCA) with HUD. The VCA, which the Orlando Housing Authority entered in 2015, initially required the OHA to construct or convert 76 public housing units into UFAS-accessible units. In November 2017, the VCA was extended for a minimum of 5 years. Under the extended agreement, the OHA must continue to improve its policies and procedures around reasonable accommodations. These activities will include modifying the OHA reasonable accommodation policy and engaging Section 8 landlords in the process of implementing approved reasonable accommodations. To assist persons with disabilities seeking to use a voucher, the OHA offers up to 120% of fair market rent to Section 8 landlords when disabled voucher holders have difficulty finding an appropriate unit.³² The Winter Park Housing Authority is not currently under a Section 504 voluntary compliance agreement.

Activities to Increase Resident Involvements

The Winter Park Housing Authority offers the ROSS program, which is a grant-funded case management program designed to assist public housing residents with finding social services and employment resources. Similarly, the Orlando Housing Authority offers the Family Self-Sufficiency program, which allows residents to set aside employment-related increases to their rental payments in an escrow account, which can be used to help the resident family attain career, educational or other personal goals, including homeownership. Through its MTW Resource Center, the Orlando Housing Authority provides participants in its self-sufficiency program with case management, needs assessments, employability counseling, and job referral/placement, as well as the use of a computer lab, bus passes, and childcare assistance.

For greater input in the management of public housing, Winter Park Housing Authority residents may participate in its Resident Advisory Board, which gives resident representatives an opportunity to review housing authority policy and provide other input from residents. The Orlando Housing Authority also has elected resident councils at its public housing sites. Resident association presidents meet monthly with the OHA staff and its President/CEO to provide input on programs, policies, and upcoming activities and share resident concerns. Resident association presidents are invited to participate in an annual leadership summit hosted by the city's mayor.

³² Orlando Housing Authority, "FY22 Moving to Work Annual Plan."
<https://www.hud.gov/sites/dfiles/PIH/documents/OrlandoFY22Plan.pdf>, p. 11

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

In 2014, the Winter Park Housing Authority received a PHAS score of 90 out of 100 as a Small PHA. The WPHA's 2020 Annual Plan identified the housing authority as a "high performer." As a Moving to Work agency, the Orlando Housing Authority is no longer scored through the Public Housing Assessment System. The Orange County Housing and Community Development Division does not receive a PHAS score.

Plan to remove the 'troubled' designation

Not applicable.

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

Barriers to Affordable Housing

Orange County, like other counties in Central Florida and across the country, is experiencing an affordable housing crisis. A 2019 study conducted by the University of Florida's Shimberg Center for Housing Studies noted that 98,654 renter households in the Orlando area spend more than 40% of their monthly income on rent alone.³³ The study further observed that an increasing renter rate was matched by an overall declining homeowner rate (down 7 percentage points between 2007 and 2017). Many new renter households had lower incomes, with approximately 59,000 households earning less than 60% AMI and over 76,000 total households being cost burdened. Cumulatively, these trends indicate a need for the creation of additional renter housing and the preservation and creation of affordable housing for purchase.

In its 2019 Housing for All 10-Year Action Plan, Orange County's Housing for All Task Force identified several regulatory barriers to affordable housing and residential investment. The plan encouraged a number of changes to the zoning code, such as removing barriers to accessory dwelling units, reducing minimum living area requirements, reducing parking requirements and allowing flexible lot configurations. Some of these barriers have already been addressed; for example, changes were made to the county's Accessory Dwelling Unit regulations in October 2019 to allow ADUs in all residential zoning districts. Flexible lot configurations are allowed under the Planned Development (PD) zoning district, the Cluster (R-CE) zoning district, and the Horizon West Town Center Planned Development Code. Other zoning requirements and design standards are also flexible within specified districts.

Strategy to Remove or Ameliorate the Barriers to Affordable Housing

In 2020, the Orange County Board of County Commissioners voted to create an Affordable Housing Trust Fund. Through this fund, the County plans to allocate more than \$10 million annually toward the creation of affordable housing stock. The Affordable Housing Trust Fund is projected to create or preserve 6,500 housing units by 2030.³⁴ Additionally, the County's Housing for All 10-Year Action Plan, which looks to create both affordable and "attainable" (or workforce) housing, includes strategies for removing regulatory barriers in the zoning code. These strategies include:

- Expanding the types of housing being constructed, to include "Missing Middle" housing.
- Modifying code and policies to increase housing development opportunities, and

³³ Shimberg Center for Housing Studies. (2019) "Orlando Area Affordable Rental Housing Needs: 2019 Update." http://www.shimberg.ufl.edu/publications/Orl_af_hsg_2019.pdf

³⁴ Orange County, FL Government. "FY 2020-2022 Affordable Housing Trust Fund Plan." <https://www.ocfl.net/Portals/0/Resource%20Library/neighbors%20-%20housing/AffordableHousingTrustFundPlan-CERT.pdf>, p. 2

- Establishing “zoning incentive areas” in exchange for affordable and attainable housing units in targeted areas.³⁵

In lieu of existing zoning incentive areas, the County has 24 opportunity zones that provide development incentives to private investors in low-income areas. Additional strategies listed in the County’s 2010-2030 Comprehensive Plan encourage the use of density bonuses in developments where at least 50% of all housing units are workforce housing.³⁶ The Comprehensive Plan also calls for Detailed Area Plans to provide for adequate workforce housing by requiring a specific percentage of affordable units, the use of the housing trust fund, linkage fee, etc.³⁷ Finally, the Comprehensive Plan recommends that affordable housing developers, in agreement with the County, create deed restrictions to maintain the affordability of their units for at least 20 years.

³⁵ Orange County, FL Government. “Housing For All 10-Year Action Plan Brief.” http://orangecountyfl.net/Portals/0/Library/Neighbors-Housing/docs/FLY_19.10_Housing_for_all_report_English_ADA_compliant.pdf, p. 1

³⁶ Orange County, FL Government. “2010-2030 Comprehensive Plan.” <http://orangecountyfl.net/Portals/0/resource%20library/planning%20-%20development/Updated%20GOPS%202021-CERT.pdf>, p. FLU-32

³⁷ Ibid. p. FLU-91

SP-60 Homelessness Strategy – 91.215(d)

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

As lead agency for the Orlando/Orange, Osceola, Seminole Counties CoC, the Homeless Services Network of Central Florida (HSN) maintains a Coordinated Entry System (CES) to prioritize services to those most in need.

In addition to outreach and assessment on an individual or family level, the County and HSN also work to understand homeless needs throughout Orange County. Each year, HSN conducts a single-day Point-in-Time (PIT) count for sheltered and unsheltered persons and works to ensure the Homeless Management Information System (HMIS) delivers data needed for HUD and local government reporting.

Homeless service organizations working in the County, such as the Health Care Center for the Homeless's Homeless Outreach Partnership Effort (H.O.P.E.) team, Covenant House Florida, and SALT Outreach also provide outreach services in Orange County. The H.O.P.E. team is made up of outreach specialists, mental health and medical providers, and others who work to build trust with residents experiencing homelessness, assess their needs and eligibility, and connect residents to services, such as transportation assistance and housing navigation.

Over the next five years, the County anticipates allocating a combination of CDBG and ESG funds to provide case management services for individuals and families experiencing homelessness.

Addressing the emergency and transitional housing needs of homeless persons

ESG funds are awarded annually to eligible nonprofit agencies that provide emergency shelter and transitional housing. The County has continuously funded emergency shelter improvements and services at a variety of nonprofit partners, such as the Coalition for the Homeless of Central Florida's emergency shelter program. Orange County will continue to use local and federal funding to support operations, maintenance, and programming at local emergency shelters and transitional housing facilities.

Over the next five years, the County anticipates allocating a combination of CDBG and ESG funds to provide emergency shelter and related services for individuals and families experiencing homelessness.

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

The Continuum of Care uses the Housing First approach to ending homelessness, which prioritizes providing permanent housing to people experiencing homelessness before attending to anything less critical, such as getting a job, budgeting, or addressing substance abuse issues. The Continuum of Care's permanent supportive housing (PSH) programs, which include wrap around services, are key to keeping formerly homeless persons in housing. The County utilizes federal Shelter Plus Care funding to provide permanent supportive housing for people with disabilities.

Over the next five years, the County anticipates allocating a combination of CDBG and ESG funds to provide rapid rehousing and case management services for individuals and families experiencing homelessness.

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

Orange County has used Emergency Solutions Grant funds to prevent individuals and families who were recently homeless from becoming homeless again, including through rapid rehousing, rent and utility assistance, case management, financial training, and other services. The County's housing rehabilitation program provides elderly homeowners with home repair assistance to prevent displacement from housing.

Over the next five years, the County anticipates allocating its annual Emergency Solutions Grant (ESG) funding to three categories focused on meeting housing needs. Specific activities may include financial assistance to help pay for housing or services designed to help people obtain or maintain housing. In both cases, assistance will be focused on housing stabilization, linking program participants to community resources and mainstream benefits, and helping participants develop a plan for preventing future housing instability. A summary of each category follows.

Emergency Shelter

- Funding for shelter operations such as maintenance, rent, utilities, and other costs.
- Funding for essential services such as case management, referrals to employment, healthcare, substance abuse services, and other related services available within the community.
- The County anticipates providing 5,760 people with emergency shelter during the 2022 through 2026 program years.

Rapid Rehousing

- Funding for relocation and stabilization case management services.
- Financial assistance with lease payments, security deposits, utility deposits and arrearages, housing searches, and costs for obtaining identification to help program participants living in shelters or in places not meant for habitation move as quickly as possible into permanent housing and achieve stability there.

- The County anticipates assisting about 200 individuals with rapid rehousing during the 2022 through 2026 program years.

Homelessness Prevention

- Funding for relocation and stabilization case management services.
- Financial assistance with lease payments or arrearages, security deposits, utility costs or arrearages, housing searches, and costs for obtaining identification to help program participants regain stability in their current permanent housing or move to other permanent housing that and achieve stability there.
- The County anticipates assisting about 500 individuals with homelessness prevention during the 2022 through 2026 program years.

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

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

Orange County follows HUD's Lead Safe Housing Rule requirements for any federally funded affordable housing development activities. The rule includes requirements for disclosure of lead-based paint hazards, risk assessment, evaluation, hazard reduction, interim controls, maintenance, and rehabilitation of properties.

The Orange County Housing and Community Development Division developed the Lead Based Paint Hazard Program in 2015 to assess lead-based paint conditions and potential hazards in homes that will be assisted with federal funds. The program includes a variety of activities to address lead-based paint hazards, including:

- Conducting lead-based paint inspections using an x-ray florescent analyzer;
- Conducting lead-based paint risk assessment, including paint sampling, dust wipes, and soil samples;
- Conducting lead-based paint worksite/residence clearance inspections after LBP hazard reduction or abatement work;
- Conducting lead-based paint hazard-reduction activities;
- Conducting lead-based paint abatement activities, utilizing certified abatement workers; and
- Designing lead-based paint hazard reduction or abatement projects.

While the Lead Based Paint Hazard Program is not funded in the 2022 Annual Action Plan, if needed, additional funds for the program may be allocated in the following action plans covered by the Consolidated Plan.

The Florida Department of Health in Orange County addresses lead-based paint hazards for any other housing unit not covered under Orange County's programs through their Lead Poisoning Prevention Program.

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

The Lead Safe Housing Rule and Lead Based Paint Hazard Program are designed to reduce hazards relating to lead-based paint in housing, which include irreversible health effects, brain and nervous system damage, reduced intelligence, and learning disabilities. Children, pregnant women, and workers are most at risk of experiencing negative health effects resulting from exposure to lead-based paint hazards. More than 20 million homes in the United States built before 1978 contain lead-based paint hazards. For these reasons, it is vital that Orange County reduce lead-based paint hazards in all federally funded housing activities.

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

Orange County will integrate Lead Safe Housing Rule requirements into housing policies and procedures by following HUD's Lead Safe Housing Rule requirements in all of the County's federally funded affordable housing development activities.

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

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

Based on American Community Survey data for 2016-2022, an estimated 10.1% of Orange County families lived below the poverty level in the last 12 months, slightly above the statewide family poverty rate of 9.4% (from ACS Table S1702).

Two regional reports outline goals and policies related to reducing the number of poverty-level families in the greater Orange County area. The Orange County Florida Comprehensive Plan (2010-2030) was amended in 2021 and includes housing and economic development goals. The Housing Element of the Comprehensive Plan is being updated in 2022. The Comprehensive Economic Development Strategy (CEDS) for the east central Florida region was prepared in 2017 and outlines economic-related goals for the eight-county region. A summary of the goals identified in each is provided below.

Housing Goals and Objectives

- Orange County will continue to ensure that an ample supply of safe and decent housing will be available, within a broad range of types and price levels, to meet current and anticipated housing needs of all residents of Orange County.
 - The County will continue to implement the recommendations of the November 2019 Housing for All 10-Year Action Plan to create and preserve 35% of projected housing units to ensure the availability of affordable and attainable rental and for sale housing. By 2030, housing market and conditions will be analyzed to plan for the following 20 years (2050).
 - The County will continue to assess its inventory of land suitable for housing development, as well as the new housing construction and preservation activity, to ensure the availability of housing units for the current and future Orange County residents.
- With continued support from Orange County, the private sector will produce affordable and attainable housing units.
 - The County will implement the form-based Orange Code to facilitate the development of a diversified housing stock, including the creation and preservation of affordable and attainable housing units, and production of missing middle housing types.
- Orange County will incentivize the production and preservation of affordable and attainable housing through the administration of housing programs, processing of applications, and distribution of grants and other funding.
 - The County will boost the production and preservation of affordable and attainable housing units by continuing to provide incentives, seek funding and grants, and implement the recommendations of the Housing for All 10-Year Action Plan.
- The housing stock in the County is maintained, improved, and preserved, thereby enhancing the character of existing neighborhoods.

- Orange County will utilize available federal, state, and local funds to reduce the proportion of substandard housing and improve the structural and aesthetic conditions of existing housing units.
- Citizens are engaged and informed regarding housing programs, funding, and training opportunities to enhance public access and availability of affordable and attainable housing.
 - The County will increase the supply and production of affordable and attainable housing through improved coordination and collaboration with the public and private sectors.
- Orange County will work to ensure that its low to moderate-income residents experience an improved quality of life through sustained access to safe and decent housing, adequate healthcare, healthy food, and social service programs.
 - The County will continue to promote and facilitate housing production to serve those populations consisting of persons with special needs, as defined in Section 420.0004, Florida Statutes.
 - The County will continue to support program and activities aimed at eliminating homelessness, particularly among homeless families with children.
- As neighborhoods improve and property values increase, the County will help existing residents remain in their communities and prevent forced relocation and prohibitive housing costs.
 - Orange County will identify means by which existing residents of the County's neighborhoods may benefit from revitalization efforts.
 - The County will ensure full compensation is made in accordance with the Relocation and Displacement Plan adopted in March 1993 in accordance with the Uniform Relocation Act when households are displaced as a result of County action.

Regional Workforce Development Goals and Objectives

- Orange County shall develop and retain a globally competitive workforce that supports the needs of both present and emerging industries.
- Orange County shall promote educational opportunities in the sciences at elementary and middle school levels.
- Orange County shall promote continuing education efforts to foster a workforce with the latest skills.
- Orange County shall support housing and transportation policies that support the local workforce.
- The County shall promote mobility in Orange County by continuing to fund public transportation.
- Orange County shall promote policies that support the quality of life of our workforce.
- Orange County recognizes the need for support services as important to employees' quality of life.
- Support educational partnerships and activities that encourage learning opportunities for East Central Florida residents
 - Educate children about career opportunities at early ages

- Encourage out-of-school enrichment activities such as high tech and business camps for youth
 - Promote libraries as community places of access for new and continuing education for adults
- Promote programs and activities that prepare our workforce for lifelong learning and ever-changing careers
 - Support programs that teach employability, critical thinking, and soft skills to workers
 - Promote the development of Massive and Open Online Courses (MOOCs) and other distance learning opportunities
 - Work with regional education tech centers to develop a higher number of short-term training and certificate programs
- Increase the educational attainment of the East Central Florida workforce Objective
 - Emphasize the importance of higher education and advanced degrees
 - Increase the number of middle-skilled workers
- Attract and retain young talented workers
 - Strengthen the existing business base and ensure the success of new companies
 - Support facilities and programs for business startups and collaborations such as co-working spaces and technology and business incubators
 - Nurture programs and organizations that promote community engagement and civic pride in our communities

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

This Consolidated Plan aligns with regional plans related to reducing poverty through housing and economic development in a few areas. Regarding housing affordability and assisting low-income renters and homeowners, Orange County funds infrastructure improvements for housing construction and rehabilitation of renter- and owner-occupied housing units. Housing assistance funded through both CDBG and HOME, as well as the State's SHIP program, will assist poverty-level families by reducing their housing and/or utility costs, allowing them to redistribute that spending to other needs or savings.

The County will also use CDBG funds for community investment, particularly for rehabilitation and construction of public facilities. Additionally, the County will allocate a share of its annual CDBG funding for public services, which will be used to support job training and placement services, among other services, during the 2022 program year.

The Housing Choice Voucher program and Tenant-Based Rental Assistance offered through the Housing and Community Development Division also provide support for poverty-level families.

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

Orange County has a number of procedures in place related to project selection and risk assessment, subrecipient monitoring, self-monitoring, and long-term compliance.

Project Selection and Risk Assessment: All potential applicants are required to attend a technical information session, familiarize themselves with all relevant application documents, including the requirements established in the Federal Register for 2 CFR Part 200, the Uniform Administrative Requirements, Cost Principles and Audit Requirements for Federal Awards. Additionally, applicants are required to have a current federal DUNS number and be registered on www.sam.gov. Once selected, all projects require a project administration agreement that states the specific project requirements, including, but not limited to, project budget, project scope, timelines, payment procedures, project outcomes, and records of beneficiaries served within the term of the project agreement.

Once an application for funding is received, each project is evaluated based on its eligibility, cost efficiency, an overall project need, an organization's experience and capacity to carry out the project, and funding availability. Eligible projects are included in the Action Plan for the upcoming year.

Subrecipient Monitoring: During the program year, the County conducts site-specific monitoring of its funded agencies and provides technical assistance as needed. Subrecipients are monitored through desk monitoring, annual reviews, site visits, and contacts by various means, including meetings, correspondence, telephone and e-mail contact. As public health conditions may dictate, some subrecipient monitoring sessions may be conducted remotely through virtual meeting software such as WebEx.

Subrecipients are required to submit their most recent annual external audit reports and copies of current insurance coverage before the on-site monitoring occurs. Additionally, all subrecipients are asked to provide staff with electronic client files for review. Monitoring and inspections of affordable multifamily projects, including HOME CHDO projects, are conducted throughout the program year.

Subrecipients funded with CDBG-CV and ESG-CV dollars to carry out activities to help prepare for, prevent, and respond to the COVID-19 pandemic are monitored using the same subrecipient monitoring process described above.

Self-Monitoring: Housing and Community Development Division sets deadlines to ensure that all required tasks and activities relating to the annual funding process are completed on time. Information from the subrecipient's reimbursement requests, such as expenditures to date and

programmatic reports, provide data for the Integrated Disbursement and Information System (IDIS) that is used in preparation of the CAPER.

Long-Term Compliance: Some funded activities, such as housing, require long-term compliance efforts. Homeowner rehabilitation activities are initially monitored and inspected by an appropriate building inspector and a rehabilitation inspector during the construction phase. Compliance requirements are stipulated in each project administration agreement. If authorized by an available HOME Program waiver, housing inspections may be temporarily suspended or postponed in order to comply with public health guidance.



2022-2023 ANNUAL ACTION PLAN



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EXPECTED RESOURCES

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

Introduction

Orange County is eligible to receive funding from three CPD formula grants (CDBG, HOME, and ESG). Combined, the County will receive an anticipated \$11,062,263 in HUD grant funds for the 2022 program year. The County also administers additional federal, state, and local funds that extend or complement the activities funded by CDBG, HOME, and ESG. The table below outlines anticipated funding levels by program.

Anticipated Resources

Table 56 - Expected Resources - Priority Table

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
CDBG	Public - Federal	Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services	\$7,278,950	\$0	\$0	\$7,278,950	\$29,115,800	<p>Anticipated CDBG funding includes entitlement grant funds, program income, and prior year resources.</p> <p>The expected amount available for the remainder of the Con Plan is four times the 2022 annual allocation.</p>

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
HOME	Public – Federal	Acquisition Homebuyer assistance Homeowner rehab Multifamily rental new construction Multifamily rental rehab New construction for ownership TBRA	\$3,145,072	\$0	\$0	\$3,145,072	\$12,580,288	Anticipated HOME funding includes entitlement grant funds, program income, and prior year resources. The expected amount available for the remainder of the Con Plan is four times the 2022 annual allocation.

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
ESG	Public – Federal	Conversion and rehab for transitional housing Financial Assistance Overnight shelter Rapid re-housing (rental assistance) Rental Assistance Services Transitional housing	\$638,241	N/A	\$15,000	\$653,241	\$2,552,964	Anticipated ESG funding includes entitlement grant funds and prior year resources. The expected amount available for the remainder of the Con Plan is four times the 2022 annual allocation.

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
General Fund	Public - Local	Acquisition Homebuyer assistance Homeowner rehab Housing Multifamily rental new construction Multifamily rental rehab New construction for ownership Rapid re-housing (rental assistance)	\$20,000,000	N/A	N/A	\$20,000,000	\$67,948,881	Orange County's Affordable Housing Trust Fund is capitalized using annual contributions of general revenue dollars.
Section 8	Public - Federal	Admin and Planning Rental Assistance Other	\$ 13,459,368	N/A	N/A	\$ 13,459,368	\$53,837,472	The County's Section 8 program, combined with 65 HUD-VASH vouchers, provides rental assistance covering a total of 1,328 housing units.

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
Shelter Plus Care	Public – Federal	Housing Rental Assistance	\$978,513	N/A	N/A	\$978,513	\$3,914,052	On behalf of the Central Florida Continuum of Care, Orange County administers 63 S+C vouchers providing housing for chronically homeless individuals with disabilities.

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
Other (Emergency Housing Vouchers)	Public - Federal	Rental Assistance	\$727,294	N/A	N/A	\$727,294	\$2,909,176	The County administers 65 Section 8 Mainstream vouchers targeted to non-elderly households with disabilities. The County also administers 66 Emergency housing Vouchers for homeless households and persons fleeing domestic violence and human trafficking.

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
Other (SHIP)	Public - State	Acquisition Admin and Planning Homebuyer assistance Homeowner rehab Housing Multifamily rental new construction Multifamily rental rehab New construction for ownership Rapid re-housing (rental assistance) Other	\$10,945,247	N/A	N/A	\$10,945,247	\$25,000,000	Florida's State Housing Initiatives Partnership (SHIP) Program provides funding for the County to produce and preserve affordable homeownership and rental housing.

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

The HOME program requires a 25% non-Federal match of the total grant amount (minus administration costs) for eligible HOME activities. Orange County will continue to use State Housing Initiatives Partnership (SHIP) Program funds to provide the match needed. In recent years, the County's allocation of SHIP funds has been more than sufficient to meet the HOME program's 25% match requirement.

The Emergency Solutions Grant regulations require a 100% match for every dollar of ESG funds allocated. ESG match requirements are met by counting non-federal funds and resources contributed by ESG-funded agencies toward programs and activities supported with the ESG funds. The County ensures the matching requirements for all ESG subrecipients are in order prior to the commitment of ESG funds and includes the match requirements as part of the project administration agreements Orange County enters into with all ESG-funded agencies. The sources of match and necessary back-up documentation are reviewed as part of monthly reimbursement requests submitted by the agencies and further discussed during the annual on-site monitoring visits and technical assistance meetings (as needed). Newly funded agencies are made aware of the matching requirements during the post-award technical assistance sessions held by the Housing and Community Development Division staff. Administration funds utilized under ESG (up to 7.5% of the total allocation) will be matched by the County.

Housing affordability is a high priority need in Orange County, and the County will continue to make use of significant opportunities to leverage other fund sources in order to meet the need. The State of Florida's SHIP funds supply a substantial source of revenue, in addition to Consolidated Plan resources, for qualified housing activities. The County uses SHIP funds primarily to provide affordable housing, with a portion designated for a pilot rapid re-housing program administered by Coalition for the Homeless of Central Florida, Inc. Additionally, the County's local Affordable Housing Trust Fund, which was established in 2020 as an outgrowth of the Housing for All 10-Year Action Plan, will be capitalized with an expected \$160 million over ten years from general revenue dollars. This funding will help advance production and preservation of affordable housing units in Orange County, and it adds significant leverage and additional resources to the strategies identified in the Consolidated Plan.

To further the goal of preventing and eliminating homelessness, the County remains one of the largest funders of homeless services in the region. Besides funding bridge housing, transitional housing, and permanent supportive housing units, the County allocates \$1.55M in general revenue funds annually for rapid re-housing of homeless families, and \$650,000 for the Diversion Program implemented by the Coalition for the Homeless of Central Florida, Inc. Additionally, the County contributes \$100,000 annually to cover operational expenses at the Samaritan Resource Center, a daily drop-in center for homeless individuals located in East Orange County.

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

The Housing and Community Development Division will continue its ongoing coordination with Orange County's Real Estate Management Division to conduct regular assessments of surplus County-owned properties suitable for residential development. Nearly 50 such properties have been identified since 2020 and transferred to nonprofits for development of affordable housing. The involvement of the County's Planning, Utilities and Development Engineering Divisions and local Affordable Housing Trust Fund resources have been instrumental in past efforts to use publicly-owned land and/or acquired property for affordable housing development. This coordination will help address the housing goal of the County's Consolidated Plan and aid in implementing recommendations of the *Housing for All 10-Year Action Plan*.

Discussion

Formula grants under the Consolidated Plan are noncompetitive awards allocated to the County based on a predetermined HUD formula. These grants include the following three programs, listed here with the amount of federal funding allocated for the 2022 program year, the first of five years covered by this plan:

- Community Development Block Grant (CDBG): \$7,278,950
- HOME Investment Partnerships Program (HOME): \$3,145,072
- Emergency Solutions Grants (ESG): \$638,241

Orange County also administers the Housing Choice Voucher Program (Section 8) under which approximately \$13 million is used annually to provide rental subsidies to 1,263 low-income households in the County. In addition, the Housing and Community Development Division administers 65 HUD-VASH rental vouchers for veterans and 670 out-of-state vouchers from the HUD Section 8 portability program. Another 65 Section 8 Mainstream Vouchers are administered by the County to provide rental assistance to non-elderly persons with disabilities. Furthermore, Shelter Plus Care (S+C) funding in the amount of \$978,000 is used to help chronically homeless individuals with permanent housing and supportive services.

Florida's State Housing Initiatives Partnership (SHIP) program allocation, along with remaining prior year funds and program income, are generally targeted to affordable housing development, down payment assistance, affordable housing preservation and pre-purchase housing counseling, as well as a pilot rapid re-housing program and impact fee subsidies for new developments.

Some CDBG and HOME activities generate program income, which is income the County receives as a direct result of its CDBG and HOME-funded investments. All program income received is entered into IDIS and drawn before any program funds.

ANNUAL GOALS AND OBJECTIVES

AP-20 Annual Goals and Objectives

Goals Summary Information

Table 57 – Goals Summary

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	Transform low to moderate-income communities into resilient communities	2022	2026	Non-Homeless Special Needs Non-Housing Community Development	Countywide	Capital Improvements Public Services	CDBG: \$2,266,716	Public facility or infrastructure activity other than low/moderate income housing benefit: 7,965 persons assisted Public service activity other than low/moderate income housing benefit: 1,308 persons assisted
2	Expand and preserve housing affordability, safety and stability for low to moderate-income households and vulnerable populations	2022	2026	Affordable Housing Public Housing Homeless Non-Homeless Special Needs	Countywide	Housing Affordability and Condition Homeless Services	CDBG: \$3,556,444 HOME: \$2,830,565 HTF: \$20,000,000 SHIP: \$2,000,000	Homeowner housing rehabilitated: 140 units Homeowner housing added: 40 units Rental units rehabilitated: 149 units Tenant-based rental assistance/Rapid Rehousing 200 households assisted

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
3	Work in collaboration with local government agencies, nonprofit organizations and industry partners to eradicate and prevent homelessness	2022	2026	Homeless	Countywide	Homeless Services Program Administration	ESG: \$653,241 SHIP: \$TBD EHV: \$727,294	Homelessness prevention: 25 families assisted Homeless person overnight shelter: 1,152 individuals assisted Tenant-based rental assistance/Rapid Rehousing 10 households assisted
4	Program Administration	2022	2026	Non-Homeless Special Needs Non-Housing Community Development Affordable Housing Homeless Public Housing	Countywide	Program Administration	CDBG: \$1,455,790 HOME: \$314,507 ESG: \$32,341	Not applicable

Goal Descriptions

Goal 1: Transform low to moderate-income communities into resilient communities

Capital improvements and infrastructure investments to enhance community safety and livability and to increase accessibility for persons with disabilities; support for services offered by nonprofit organizations and to increase housing stability, provide job training and placement, and meet special needs of vulnerable populations such as children, the elderly, and people with disabilities.

Goal 2: Expand and preserve housing affordability, safety and stability for low to moderate-income households and vulnerable populations

Rehabilitation of rental and homeowner housing to benefit extremely low-, low-, and moderate-income households; tenant-based rental assistance, and CHDO funds to support development of new housing for homeownership.

Goal 3: Work in collaboration with local government agencies, nonprofit organizations, and industry partners to eradicate and prevent homelessness

Provide housing and services for residents experiencing or at-risk of homelessness, including homelessness prevention, case management, wrap-around services, emergency shelter, rapid rehousing, and HMIS support.

Goal 4: Program Administration

Plan and administer funding for community development and housing activities with transparency, community involvement, and full compliance with federal regulations. Provide services to residents and housing providers to advance fair housing.

PROJECTS

AP-35 Projects – 91.220(d)

Introduction

The projects listed below represent the activities Orange County plans to undertake during the 2022 program year to address the goals of transforming communities, expanding housing affordability, and eradicating homelessness. All proposed projects and associated activities will be implemented on the County-wide geographic distribution basis.

Projects

Table 58 – Project Information

#	Project Name
1	2022 CDBG Capital Improvement Projects
2	2022 CDBG Housing Projects - Infrastructure Improvements
3	2022 CDBG Housing Projects - Rental Housing Rehabilitation
4	2022 CDBG Housing Projects - Homeowners Single Family Rehabilitation
5	2022 CDBG Housing Projects - Housing Rehabilitation Administration
6	2022 CDBG Public Services
7	2022 CDBG Administration
8	2022 HOME Tenant Based Rental Assistance
9	2022 HOME Homeowners Single Family Rehabilitation
10	2022 HOME Rental Housing Rehabilitation
11	2022 HOME Community Housing Development Organizations
12	2022 HOME Administration
13	2022 Emergency Solutions Grant
14	2022 ESG Reprogrammed Funds

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

Each year, Orange County Housing and Community Development Division sets its allocation priorities based on factors such as percentage of low- and moderate-income population, substandard housing stock, and need for other improvements. Additionally, input obtained from neighborhood meeting attendees, stakeholder focus groups, and consultation with other jurisdictions and local partners also influence allocation priorities. This collective information confirms that there are ongoing, unmet needs for public services, homeless services, and capital

improvements. Housing affordability also remains a critical need in Orange County and has only heightened in priority over recent years. With sharply rising housing prices and an influx of new residents to the Central Florida region, Orange County now ranks as one of the least affordable places to live in the nation. At the same time, low- to moderate-income communities continue to need capital improvement projects and public services to help stabilize neighborhoods, expand economic opportunities for low-income families and individuals, and meet an increased demand for social services.

AP-38 Project Summary

Project Summary Information

1	Project Name	2022 CDBG Capital Improvement Projects
	Target Area	County-wide
	Goals Supported	Transform low to moderate-income communities into resilient communities
	Needs Addressed	Capital Improvements
	Funding	CDBG: \$1,250,000
	Description	Capital improvement projects are implemented in accordance to 24 CFR 570.483(b)(2) of the federal Community Development Block Grant regulations. Capital projects planned for FY 2022-2023 include construction of two public facilities.
	Target Date	9/30/2023
	Estimate the number and type of families that will benefit from the proposed activities	7,965 low-income individuals.
	Location Description	Projects to be located within the boundaries of Orange County.
	Planned Activities	<p>The planned activities under CDBG Capital Improvement Projects are summarized below:</p> <ul style="list-style-type: none"> • IDignity, Inc. will receive \$750,000 to cover site development costs for its new permanent headquarters, to include client service areas and office space for provision of legal identification services. • Healthcare Center for the Homeless, Inc. will receive \$500,000 for construction costs for the Ivey Lane Health Center Expansion Project expected to serve very low and low-income individuals.
2	Project Name	2022 CDBG Housing Projects - Infrastructure Improvements

	Target Area	County-wide
	Goals Supported	Expand and preserve housing affordability, safety and stability for low to moderate-income households and vulnerable populations
	Needs Addressed	Housing Affordability and Condition
	Funding	CDBG: \$1,000,000
	Description	Infrastructure improvements for housing construction, to include pre-development costs necessary for future development of affordable ownership housing.
	Target Date	9/30/2023
	Estimate the number and type of families that will benefit from the proposed activities	40 low-income individuals
	Location Description	Projects to be located within the boundaries of Orange County.
	Planned Activities	Planned activities include the following: <ul style="list-style-type: none"> The City of Apopka will receive \$1,000,000 to cover the costs of clearing, excavation, and roadway construction for a 10-acre site slated for development of a minimum of 40 affordable homeownership units for seniors and families.
3	Project Name	2022 CDBG Housing Projects - Rental Housing Rehabilitation
	Target Area	County-wide
	Goals Supported	Expand and preserve housing affordability, safety and stability for low to moderate-income households and vulnerable populations
	Needs Addressed	Housing Affordability and Condition
	Funding	CDBG: \$710,705

	Description	A total of \$710,705 is designated to preserve affordable rental housing in Orange County. Activities to include renovations to, and rehabilitation of affordable rental housing units for low-income individuals and families.
	Target Date	9/30/2023
	Estimate the number and type of families that will benefit from the proposed activities	149 low-income households
	Location Description	Projects to be located within the boundaries of Orange County.
	Planned Activities	Planned rental housing rehabilitation activities include the following: <ul style="list-style-type: none"> Catholic Charities of Central Florida, Inc. will receive \$312,044 in CDBG funds to complete upgrades at Monsignor Bishop Manor apartment complex, which provides affordable housing to low-income individuals and families, to include replacement of electrical panels on 69 units. Orlando Neighborhood Improvement Corp. will use \$398,661 in CDBG funds to cover the cost of HVAC replacement on up to 100 affordable rental units, of which 80 units will be occupied by low- to moderate-income households.
4	Project Name	2022 CDBG Housing Projects - Homeowners Single Family Rehabilitation
	Target Area	County-wide
	Goals Supported	Expand and preserve housing affordability, safety and stability for low to moderate-income households and vulnerable populations
	Needs Addressed	Housing Affordability and Condition
	Funding	CDBG: \$1,418,700 SHIP: \$2,000,000

	Description	Rehabilitation assistance to provide minor or major home repairs to very low to low-income homeowners in Orange County. The County utilizes CDBG, HOME and local SHIP funds for the Housing Rehabilitation Program. The program focuses primarily on seniors and individuals with disabilities.
	Target Date	9/30/2023
	Estimate the number and type of families that will benefit from the proposed activities	140 low-income homeowner households, with priority given to seniors and persons with disabilities
	Location Description	Projects to be located within the boundaries of Orange County.
	Planned Activities	<p>Orange County plans to assist 100 low-income homeowners through its Housing Rehabilitation Program, with activities including the following:</p> <ul style="list-style-type: none"> • Minor home repair assistance – includes repairs up to \$25,000 related to life, health, safety or code violations. CDBG and SHIP remain the main funding source for this program. • Major rehabilitation – includes electrical, plumbing, roof repairs and other major health hazards. These repairs are limited to \$75,000 and may be funded by CDBG, HOME or local SHIP funds. • Emergency repairs – Orange County will continue to implement an emergency repairs' program for roof repairs, septic system repairs or similar repairs that constitute an urgent safety and health hazard. <p>Additionally, Orange County will award \$578,700 to Habitat for Humanity Greater Orlando and Osceola County, Inc. for the Roofing Program – to replace deteriorating roofs on forty (40) existing homes that are owned by very low and low-income households.</p>
5	Project Name	2022 CDBG Housing Projects - Housing Rehabilitation Administration
	Target Area	County-wide

	Goals Supported	Expand and preserve housing affordability, safety and stability for low to moderate-income households and vulnerable populations
	Needs Addressed	Housing Affordability and Condition
	Funding	CDBG: \$427,039
	Description	Costs associated with service delivery and administration of housing rehabilitation projects.
	Target Date	9/30/2023
	Estimate the number and type of families that will benefit from the proposed activities	N/A - program administration. Beneficiary data will be recorded at activity level.
	Location Description	Projects to be located within the boundaries of Orange County.
	Planned Activities	This project involves administration and service delivery of minor, major and emergency rehabilitation programs and the Lead Based Paint Hazard program operated by Orange County.
6	Project Name	2022 CDBG Public Services
	Target Area	County-wide
	Goals Supported	Transform low to moderate-income communities into resilient communities
	Needs Addressed	Public Services
	Funding	CDBG: \$1,016,716
	Description	Orange County will fund public services for low-to-moderate income persons to encourage self-sufficiency, provide stabilization and crisis intervention, job training, educational programs, and services for youth, homeless and persons with severe disabilities.
	Target Date	9/30/2023

Estimate the number and type of families that will benefit from the proposed activities	1,308 low-income individuals
Location Description	Location of projects is within Orange County boundaries.
Planned Activities	<p>The planned Public Services activities for FY 2021-2022 are described below.</p> <ul style="list-style-type: none"> • Case management and crisis intervention – A total of \$155,000 in CDBG funds will be allocated as follows: \$60,000 for Aspire Health Partners, Inc. to provide comprehensive substance abuse treatment & behavioral health care services for homeless and low-income women; and \$55,000 for Jewish Family Services, Inc. to conduct case management, financial counseling and crisis intervention for individuals and families on the brink of homelessness. • Services for the homeless – Orange County will allocate a total of \$135,000 in CDBG funds for services for the homeless to be distributed as follows: \$55,000 in funds for Health Care Center for the Homeless, Inc. to provide mental health and substance abuse services; \$40,000 for IMPOWER, Inc. for transitional housing and extended support services for former foster care youth; and \$40,000 for iDignity, Inc. for identification services for homeless and precariously housed/low-income individuals. • Children services – Orange County will allocate \$231,716 in CDBG funding for children services as follows: \$150,000 for Community Coordinated Care for Children, Inc. to provide childcare subsidies for children of low-income working families; \$41,716 in CDBG funds for Boys and Girls Clubs of Central Florida, Inc. to support childcare and afterschool program for homeless and low-income children; and \$40,000 for Harbor House of Central Florida, Inc. to fund child care and case management services for homeless children staying at the domestic violence shelter. • Services for elderly and persons with disabilities – Orange County will allocate a total of \$340,000 for services for the elderly and people who are disabled to be distributed as follows: \$135,000 will be allocated to Seniors First, Inc. to provide in-

		<p>home meal delivery for homebound low-income seniors; \$42,000 in CDBG funds to Center for Independent Living, Inc. for its employment and self-sufficiency program for individuals with disabilities; \$58,000 to Life Concepts, Inc. for a supportive and transitional living program for persons with developmental disabilities; \$58,000 for Lighthouse Central Florida, Inc. to fund visual rehabilitation services for older blind persons; and \$47,000 in funds for Primrose Center, Inc. to provide employment training and placement for persons with developmental disabilities.</p> <ul style="list-style-type: none"> • Job training and placement – A total of \$70,000 in CDBG funds will be allocated as follows: \$35,000 for Embrace Families, Inc. to fund case management and apprenticeship at non-profit agencies for low-income individuals; \$35,000 for First Step Staffing, Inc. to support job placement services for special needs populations, to include homeless. • Housing stability and wraparound services – Orange County will provide a total of \$125,000 in CDBG funds for services to help stabilize and support residents who are at-risk of becoming homeless as follows: \$45,000 for Grand Avenue Econ. Comm. Dev. Corp. to fund housing stability and wraparound services for formerly homeless individuals; \$40,000 for personnel expenditures associated with a case manager position at the Pathways Drop-In Center; and \$40,000 for J.U.M.P. Ministries, Inc. to provide wraparound services to homeless individuals in transitional housing.
7	Project Name	2022 CDBG Administration
	Target Area	County-wide
	Goals Supported	Program Administration
	Needs Addressed	Program Administration
	Funding	CDBG: \$1,455,790
	Description	Activities related to the administration of grant programs.
	Target Date	9/30/2023

	Estimate the number and type of families that will benefit from the proposed activities	150 low-income individuals to benefit from fair housing activities.
	Location Description	Location of projects is within Orange County boundaries.
	Planned Activities	Costs associated with planning and administration of grant funds including, but not limited to, salaries, supplies, rent, travel, training, etc. The County will also allocate \$10,000 from CDBG Administration funds for various fair housing activities, such as educational workshops, training, and development of fair housing materials for distribution.
8	Project Name	2022 HOME Tenant Based Rental Assistance
	Target Area	County-wide
	Goals Supported	Expand and preserve housing affordability, safety and stability for low to moderate-income households and vulnerable populations
	Needs Addressed	Housing Affordability and Condition
	Funding	HOME: \$1,500,000
	Description	The project provides rental subsidies for seniors and persons with disabilities, including formerly homeless individuals.
	Target Date	9/30/2023
	Estimate the number and type of families that will benefit from the proposed activities	200 low-income senior households or households of persons with disabilities, including those who were formerly homeless
	Location Description	Location of projects is within Orange County boundaries.
	Planned Activities	This project under the HOME Program will provide rental subsidies to serve approximately 200 households.

9	Project Name	2022 HOME Homeowners Single Family Rehabilitation
	Target Area	County-wide
	Goals Supported	Expand and preserve housing affordability, safety and stability for low to moderate-income households and vulnerable populations
	Needs Addressed	Housing Affordability and Condition
	Funding	HOME: \$300,000
	Description	Orange County has designated \$300,000 in HOME funds to provide very low and low-income homeowners with housing rehabilitation assistance. CDBG funds and local SHIP funds are also used for this purpose. As part of implementing the Housing for All 10-Year Action Plan, a local Affordable Housing Trust Fund Plan was adopted in 2020. These Trust Fund resources can be leveraged with federal dollars for increased affordable housing options that benefit low to moderate-income households in Orange County.
	Target Date	9/30/2023
	Estimate the number and type of families that will benefit from the proposed activities	3 low-income households are expected to benefit from homeowner single-family rehabilitation activities funded with HOME funds.
	Location Description	Location of projects is within Orange County boundary.
10	Planned Activities	Rehabilitation activities include major repairs necessary to ensure the health and safety of the residents, as well as complete rebuild of properties no longer suitable for habitation.
	Project Name	2022 HOME Rental Housing Rehabilitation
	Target Area	County-wide
	Goals Supported	Expand and preserve housing affordability, safety, and stability for low to moderate-income households and vulnerable populations
	Needs Addressed	Housing Affordability and Condition
	Funding	HOME: \$558,804

	Description	HOME funds will be used to renovate and preserve affordable rental units for very low, low-income and homeless households.
	Target Date	9/30/2023
	Estimate the number and type of families that will benefit from the proposed activities	TBD
	Location Description	Location of projects is within Orange County boundaries.
	Planned Activities	In FY 2022-2023, various projects will receive financial assistance to aid in the preservation of affordable rental housing units. HOME funds will be used to leverage funding for these projects. Local Trust Fund dollars and SHIP funds can be leveraged for the same purpose.
11	Project Name	2022 HOME Community Housing Development Organizations
	Target Area	County-wide
	Goals Supported	Expand and preserve housing affordability, safety and stability for low to moderate-income households and vulnerable populations
	Needs Addressed	Housing Affordability and Condition
	Funding	HOME: \$471,761
	Description	HOME funds require a minimum 15% set-aside for activities with Community Housing Development Organizations (CHDOs).
	Target Date	9/30/2023
	Estimate the number and type of families that will benefit from the proposed activities	At least one (1) very low- to low-income household is expected to benefit from CHDO activities funded with HOME funds.
	Location Description	Location of projects is within Orange County boundaries.

	Planned Activities	Orange County plans to partner with a certified CHDO (Grand Ave. Econ. Comm. Dev. Corp. or another qualified and certified CHDO) to construct one affordable single-family home to be rented to a previously homeless family. All projects funded with CHDO set-aside must meet HOME eligibility criteria, including CHDO qualification status and a risk assessment of the project.
12	Project Name	2022 HOME Administration
	Target Area	County-wide
	Goals Supported	Program Administration
	Needs Addressed	Program Administration
	Funding	HOME: \$314,507
	Description	The HOME program allows up to 10% of the total allocation for planning and administration activities.
	Target Date	9/30/2023
	Estimate the number and type of families that will benefit from the proposed activities	N/A
	Location Description	
	Planned Activities	Planning and administration of HOME funded activities, such as tenant-based rental assistance, and rental and homeowner rehabilitation.
13	Project Name	2022 Emergency Solutions Grant
	Target Area	County-wide
	Goals Supported	Work in collaboration with local government agencies, nonprofit organizations, and industry partners to eradicate and prevent homelessness
	Needs Addressed	Homeless Services Program Administration

	Funding	ESG: \$638,241
	Description	In FY 2022-2023, Orange County will receive \$600,900 in Emergency Solutions Grant funds (ESG) to support activities aimed at preventing and eliminating homelessness. A portion of the funds will be used to support ESG administration and the Homeless Management Information System (HMIS) platform, for a total of \$638,241.
	Target Date	9/30/2023
	Estimate the number and type of families that will benefit from the proposed activities	1,292 very low, low-income and homeless individuals and families are expected to benefit from the ESG-funded activities in FY 2022-2023.
	Location Description	Location of projects is within Orange County boundaries.
	Planned Activities	<p>The planned activities under the Emergency Solutions Grant are as follows:</p> <ul style="list-style-type: none"> • Shelter operations – Orange County will provide \$382,900 or close to 60% of the Emergency Solutions Grant (ESG) allocation, to maintain operations and services at existing homeless shelter facilities. This funding will be distributed among five agencies: Coalition for the Homeless of Central Florida, Inc. will receive \$100,000 in funds to support shelter operation expenses at two facilities serving the homeless; Covenant House Florida, Inc. will be funded in the amount of \$70,000 to support operational expenses and provision of essential services at the shelter facility for homeless unaccompanied youth (ages 18-20); \$60,000 for Family Promise of Greater Orlando, Inc. to support operational expenses and essential services (case management) at the shelter facilities for homeless families; Harbor House of Central Florida, Inc. will be funded in the amount of \$77,900 to assist with operating costs of the shelter facility for victims of domestic violence and their children; and The Salvation Army will receive \$75,000 for staffing and support of an emergency shelter serving homeless men, women, and children. • Homelessness prevention services – Orange County will fund Family Promise of Greater Orlando, Inc. in the amount of \$80,000 to provide homelessness

		<p>prevention services, to include financial assistance and case management, to eligible households who are at risk of becoming homeless.</p> <ul style="list-style-type: none"> • Rapid re-housing and stabilization services – A total of \$138,000 in ESG funding will be designated to Catholic Charities of Central Florida, Inc. for rapid re-housing assistance, including case management, housing location and relocation services to eligible individuals and families who have recently become homeless. • Homeless Management Information System (HMIS) – A total of \$5,000 will be set aside for HMIS-related expenditures, to include the cost of licenses and technical support for ESG-funded agencies, as well as CAPER data collection and reporting. • ESG Administration – A total of \$32,341, or approximately 5% of the total ESG allocation for FY 2022-2023, will be used for administration, to include review of reimbursement requests, monitoring of ESG-funded agencies, and provision of technical assistance.
14	Project Name	2022 ESG Reprogrammed Funds
	Target Area	County-wide
	Goals Supported	Work in collaboration with local government agencies, nonprofit organizations and industry partners to eradicate and prevent homelessness
	Needs Addressed	Homeless Services Program Administration
	Funding	ESG: \$15,000
	Description	The County will direct \$15,000 in reprogrammed ESG funds from FY 2021 to further support the Homeless Services Network of Central Florida, Inc. in operation and maintenance of the HMIS.
	Target Date	9/30/2023
	Estimate the number and type of families that will benefit from the proposed activities	TBD

	Location Description	Future projects are to be located within Orange County boundary.
	Planned Activities	Support for the Homeless Management Information System (HMIS) helps to ensure efficiently coordinated services across the Continuum of Care.

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

The Orange County HUD entitlement jurisdiction includes block groups within Orange County, excluding the City of Orlando. Figure 3 identifies low- and moderate-income block groups (51% or more low- and moderate-income population) in Orange County. Each year, the County strives to fund projects that serve areas with the greatest need, as determined by factors such as percentage of low- and moderate-income population, substandard housing stock, and need for other improvements. Additionally, the County funds projects that address priority needs of income-eligible households and special needs populations living throughout Orange County.

Geographic Distribution

Table 59 - Geographic Distribution

Target Area	Percentage of Funds
Countywide	100%

Rationale for the priorities for allocating investments geographically

Each year, the County will select projects and activities that meet the priorities and goals identified in the Consolidated Plan. This process will utilize a variety of methods to select projects, such as consultation with County staff and current subrecipients, implementation of other standing County plans, and formal Requests for Proposals. Projects and activities must best meet priority needs based on project eligibility, availability of funds, number of anticipated beneficiaries served, and readiness to proceed. The County does not identify target areas for the use of HUD grant funds.

AFFORDABLE HOUSING

AP-55 Affordable Housing – 91.220(g)

Introduction

Orange County is deeply committed to increasing its supply of affordable housing through implementation of the Housing For All 10-Year Action Plan. The goal of the 10-Year Action Plan is to produce or preserve 33,300 housing units in Orange County, of which at least 11,000 will be affordable to very low, low, and moderate-income households. As part of the 10-Year Action Plan, the County established its own Affordable Housing Trust Fund in 2020. Resources from the Trust Fund provide financial leverage for affordable housing production and preservation activities. Through its various Consolidated Plan housing activities, Orange County expects to provide affordable housing for the following numbers of extremely low-income, low-income, and moderate-income families over the 2022 Program Year.

Table 60 - One Year Goals for Affordable Housing by Support Requirement

One Year Goals for the Number of Households to be Supported	
Homeless	329
Non-Homeless	1,603
Special-Needs	65
Total	1,997

Table 61 - One Year Goals for Affordable Housing by Support Type

One Year Goals for the Number of Households Supported Through	
Rental Assistance	2,417
The Production of New Units	45
Rehab of Existing Units	309
Acquisition of Existing Units	140
Total	2,911

Discussion

The detailed explanation of FY 2022-2023 activities aimed at creation and preservation of affordable housing units in Orange County is presented below. All activities are grouped by support requirement and by support type.

By Support Requirement:

Homeless – 329

- Rapid re-housing – 135 households (10 – ESG funds, and 125 – general revenue)
- HUD-VASH – 65
- Shelter Plus Care – 63
- Emergency Housing Vouchers – 66 (for homeless households, including homeless youth

ages 18-24, and persons fleeing domestic violence and human trafficking)

Non-Homeless – 1,603

- Single family homeowner rehabilitation – 100 units (County's Program)
- Habitat for Humanity Greater Orlando and Osceola County, Inc. – Roofing Project – 40 units
- Section 8 – 1,263
- HOME TBRA – 200

Special Needs – 65

- Mainstream Vouchers – 65 (for persons under 62 years and disabled who are at risk for homelessness or were previously homeless)

Orange County will continue to fund rehabilitation of single-family homeowner occupied housing with a special focus on elderly and persons with disabilities, and rehabilitation of group homes for persons with disabilities. In addition, the County will use SHIP funds for the rehabilitation of two (2) group homes (in partnership with Primrose Center, Inc.) that provide housing to 24 individuals with disabilities.

TOTAL – 1,997

By Support Type:

Rental Assistance – 2,417

- HOME TBRA – 200
- Section 8 – 1,263
- Out-of-state vouchers – 670
- Shelter Plus Care – 63
- HUD-VASH – 65
- Mainstream Vouchers – 65
- Emergency Housing Vouchers – 66
- Homelessness Prevention – 25 (ESG funds)

Production of New Units – 45

- City of Apopka (site development for affordable homeownership) – 40 units
- Grand Ave. Economic Development Corporation (Homeless Veteran's Housing – SHIP or general revenue funds) – 5 units

Rehab of Existing Units – 309

- Single family homeowner rehabilitation – 100 units (County's Program)
- Habitat for Humanity Greater Orlando and Osceola County, Inc. – Roofing Project – 40 units
- Monsignor Bishop Manor Apartments Phase IV (rental rehabilitation) – 69 units
- Maitland Oaks/Orlando Neighborhood Improvement Corp. (rental rehabilitation) – 100 units

Acquisition of Existing Units – 140

- Down Payment Assistance – 140 (SHIP funds)

TOTAL - 2,899

AP-60 Public Housing – 91.220(h)

Introduction

Orange County, excluding the City of Orlando, offers 171 public housing units located in the City of Winter Park and 202 public housing units through the Orlando Housing Authority. The Orange County Housing and Community Development Division also provides 1,263 Section 8 housing choice vouchers. When the City of Orlando is included in these counts, Orange County offers a total of more than 4,000 housing choice vouchers. The Orlando Housing Authority offers 2,481 of these vouchers, which may be located both within the City of Orlando or in other locations in Orange County.

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

In the coming program year, the Winter Park Housing Authority will continue to repair structures at The Meadows Apartments and Tranquil Terrace to reduce deterioration and ensure their longevity. According to its FY 22 MTW Plan, the Orlando Housing Authority plans to create 45 project-based VASH vouchers for veterans at select locations in Orange County. The OHA also evaluated its public housing inventory and identified six (6) sites for demolition and redevelopment as part of a long-term housing revitalization strategy. If these demolitions are approved by HUD, relocated households will continue to receive housing through Tenant Protection Vouchers (Section 8).

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

In 2021, the Winter Park Housing Authority partnered with Health CDC to provide case management to residents of The Meadows Apartments who would like to be homeowners. Residents of the Orlando Housing Authority may pursue homeownership opportunities through coordinated information, referral and counseling services provided at the Moving to Work (MTW) Resource Center, and OHA's Resident Opportunities and Self Sufficiency and Family Self-Sufficiency (ROSS) Programs.

In 2010, the United States Department of Housing and Urban Development (HUD) awarded the Orlando Housing Authority the Moving to Work (MTW) designation that allows housing authorities to implement innovative programs (normally not permitted) to encourage self-sufficiency. One of the initial activities under the MTW Program was an increase of the OHA's rent floor to \$225 per month. The rent floor does not apply to the elderly or disabled. Residents unable to pay the \$225 must participate in the MTW Resource Center. Through the services provided at the Resource Center, residents develop individual action plans and set goals to move toward self-sufficiency. The MTW Resource Center offers job readiness training, job recruiting services, childcare, and transportation assistance, if needed.

As an MTW Demonstration Agency, the OHA also developed a program to provide transitional housing, in the form of project-based housing choice voucher (Section 8) assistance to homeless individuals for up to 24 months at West Oaks Apartments (OHA owned, non-public housing). The OHA partners with local homeless service agencies to provide case management

support to participants. According to its FY 22 MTW Plan, the Orlando Housing Authority is also currently planning a Section 8 Project-Based Homeownership program, which will be open to its public housing and housing choice voucher residents. The program will construct 82 mixed-income homeownership units at Carver Park in the City of Orlando.³⁸

For greater input in the management of public housing, Winter Park Housing Authority residents may participate in its Resident Advisory Board, which gives resident representatives an opportunity to review housing authority policy and provide other input from residents. The Orlando Housing Authority also has elected resident councils at its public housing sites. Resident association presidents meet monthly with the OHA staff and its President/CEO to provide input on programs, policies, and upcoming activities and share resident concerns. Resident association presidents are invited to participate in an annual leadership summit hosted by the city's mayor.

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

Not applicable.

³⁸ Orlando Housing Authority. "FY 2022 Moving to Work Annual Plan."
<https://www.hud.gov/sites/dfiles/PIH/documents/OrlandoFY22Plan.pdf>, p. 23

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

Introduction

The Central Florida Commission on Homelessness serves as the organizing entity for the Continuum of Care (CoC) for Orange, Osceola, and Seminole counties. The CoC brings together housing and service providers to meet the needs of individuals and families experiencing homelessness. Over the next year, the County will continue to partner with the CoC to address homelessness and the priority needs of homeless individuals and families, including homeless subpopulations.

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

As lead agency for the Orlando/Orange, Osceola, Seminole Counties CoC, the Homeless Services Network of Central Florida (HSN) maintains a Coordinated Entry System (CES) to prioritize services to those most in need. In addition to outreach and assessment on an individual or family level, the County and HSN also work to understand homeless needs throughout Orange County. Each year, HSN conducts a single-day Point-in-Time (PIT) count for sheltered and unsheltered persons and works to ensure the Homeless Management Information System (HMIS) delivers data needed for HUD and local government reporting.

Various homeless service organizations also provide outreach services in Orange County, such as the Homeless Outreach Partnership Effort (H.O.P.E.) team operated by the Health Care Center for the Homeless and the programs of Covenant House Florida and SALT Outreach. The H.O.P.E. team is made up of outreach specialists, mental health and medical providers, and others who work to build trust with residents experiencing homelessness, assess their needs and eligibility, and connect residents to services, such as transportation assistance and housing navigation.

During the 2022 program year, the County will provide about \$125,000 in CDBG funds for housing stability and wraparound services; \$135,000 for services for homeless individuals and families, including health and identification services; and \$155,000 for case management and crisis intervention.

Addressing the emergency shelter and transitional housing needs of homeless persons

ESG funds are awarded annually to eligible nonprofit agencies that provide emergency shelter and transitional housing. The County has traditionally funded emergency shelter improvements and services for a number of service providers. Orange County will continue to use local and federal funding to support operations, maintenance, and programming at local emergency

shelters and transitional housing facilities. The County plans to provide \$382,900 in ESG funds to support shelter operations in partnership with the following agencies: Coalition for the Homeless of Central Florida, Covenant house Florida, Family Promise of Greater Orlando, Harbor house of Central Florida, and The Salvation Army.

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 Continuum of Care uses the Housing First approach to ending homelessness, which prioritizes providing permanent housing to people experiencing homelessness before attending to anything less critical, such as getting a job, budgeting, or addressing substance abuse issues. The Continuum of Care's permanent supportive housing (PSH) programs, which include wrap around services, are key to keeping formerly homeless persons in housing. The County utilizes federal Shelter Plus Care funding to provide permanent supportive housing for people with disabilities.

The County plans to provide \$138,000 in ESG funds for rapid re-housing during the 2022 program year, as well as about \$125,000 in CDBG funds for housing stability and wraparound services and \$155,000 for case management and crisis intervention.

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

Orange County has used Emergency Solutions Grant funds to prevent individuals and families who were recently homeless from becoming homeless again, including through rapid re-housing, rent and utility assistance, case management, financial training, and other services. The County's housing rehabilitation program provides elderly homeowners with home repair assistance to prevent displacement from housing.

The County will provide \$80,000 in ESG funds to serve about 25 families through homelessness prevention during the 2022 program year. This funding includes costs to cover rental assistance, arrears, and personnel expenses. The County will provide \$578,700 in CDBG funds to serve about 40 households through its single family home rehabilitation program in partnership with Habitat for Humanity Greater Orlando and Osceola County. The program covers replacement of deteriorating roofs on owner-occupied units.

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

Introduction:

Orange County, like other counties in Central Florida and across the country, is experiencing an affordable housing crisis. A 2019 study conducted by the University of Florida's Shimberg Center for Housing Studies noted that 98,654 renter households in the Orlando area spend more than 40% of their monthly income on rent alone.³⁹ The study further observed that an increasing renter rate was matched by an overall declining homeowner rate (down 7 percentage points between 2007 and 2017). Many new renter households had lower incomes, with approximately 59,000 households earning less than 60% AMI and over 76,000 total households being cost burdened. Cumulatively, these trends indicate a need for the creation of additional renter housing and the preservation and creation of affordable housing for purchase.

In its 2019 Housing for All 10-Year Action Plan, Orange County's Housing for All Task Force identified several regulatory barriers to affordable housing and residential investment. These regulatory barriers found the zoning code included restrictions on accessory dwelling units, and a need to reduce minimum living area requirements, increase or eliminate household occupancy limits, reduce parking requirements, and allow flexible lot configurations. Since the creation of the plan, the County has amended its zoning code to allow accessory dwelling units by right in all residential zoning districts.

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

Through the Affordable Housing Trust Fund, the Orange County Board of County Commissioners plans to allocate \$20 million in the coming program year toward the creation of affordable housing stock (at the discretion of the Commission). During the 2022 State of the County address, the County Mayor Jerry Demings announced that the Board of Commissioners would leverage \$14 million from the Affordable Housing Trust Fund to help develop 633 affordable housing units, beginning in the program year. The Affordable Housing Trust Fund continues to be the County's primary tool for advancing its housing goals, including affordable rental unit creation and missing middle housing creation.

Other initiatives beginning in the year include the utilization of undeveloped land to build 37 affordable single-family homes through the County's Surplus Lot Program. The County's Housing and Community Development Division has received the approval of the \$3.5 million revolving loan fund for affordable housing, with expenditures beginning during the program

³⁹ Shimberg Center for Housing Studies. (2019) "Orlando Area Affordable Rental Housing Needs: 2019 Update." http://www.shimberg.ufl.edu/publications/Orl_af_hsg_2019.pdf

year. Finally, the Board of County Commissioners will hold a special work session in June 2022 to discuss rent control and other options to mitigate the affordable housing crisis.

AP-85 Other Actions – 91.220(k)

Introduction:

This section details the County's plans to ensure safe and affordable housing for its residents, meet underserved needs, reduce poverty, develop institutional structure, and enhance coordination between public and private sector housing and community development agencies.

Actions planned to address obstacles to meeting underserved needs

The County continually works to build community capacity to meet underserved needs through partner agencies within the community. However, limited staff capacity and financial resources among these agencies remains a primary obstacle. Given these limitations, the careful analysis and detailed community engagement represented by the Consolidated Plan process is key to allocating the County's federal funding to the highest-priority needs. The County will continue to use its resources carefully and strategically with a focus on serving the community's priority needs. Additionally, some organizations are reluctant to administer federally funded programs using CDBG, HOME, or ESG funds due to the complex requirements attached to the grant funds. The County will continue to periodically offer training and technical assistance to current and prospective subrecipient organizations to build their capacity for responsibly managing federal funding.

Actions planned to foster and maintain affordable housing

A lack of affordable housing is a primary obstacle to addressing unmet needs. The County will continue to support its goal of improving housing opportunities by creating and preserving decent, safe, affordable rental and homeownership housing. Through its annual CDBG allocation, the County will fund rental and single-family housing rehabilitation and infrastructure improvements for housing construction. To further foster development of affordable housing, the County's annual HOME allocation will be directed to developers and subrecipients, including Community Housing Development Organizations, proposing to rehabilitate or build new housing that meets HUD affordability guidelines. The HOME allocation will also continue to provide Tenant-Based Rental Assistance and support single-family and rental housing rehabilitation.

The County's Housing Trust Fund, established in 2020, is intended to incentivize the construction and preservation of affordable and attainable housing, encourage Missing Middle housing types, and meet other housing needs identified by the 10-Year Action Plan. The County projects that a minimum of 6,500 certified affordable units will be produced or preserved in Orange County by 2030 as a result of the Housing Trust Fund.

Actions planned to reduce lead-based paint hazards

An important initiative emanating from HUD in the last decade is the reduction of lead-based paint hazards, and many jurisdictions around the country have focused on reaching this goal. The federal Residential Lead-Based Paint Hazard Reduction Act of 1992 (Title X of the Housing and Community Development Act of 1992) amends the Lead-Based Paint Poisoning Prevention

Act of 1971, which is the law covering lead-based paint in federally funded housing. These laws and subsequent regulations issued by the U.S. Department of Housing and Urban Development (24 CFR part 35) protect young children from lead-based paint hazards in housing that is financially assisted or being sold by the federal government.

Should the County undertake any property rehabilitation projects, it will assess whether lead-based paint might be present and, if so, follow the guidelines set forth in the Residential Lead-Based Paint Hazard Reduction Act of 1992. The County is committed to testing and abating lead in all pre-1978 housing units assisted with federal grant funds in any of the housing programs it implements.

As appropriate, public service and housing rehab subrecipient agencies are required to provide information concerning lead hazards to their beneficiaries. The County's CDBG and HOME program staff are trained regarding the implementation of the Lead Based Paint Rule and implementation of the rule in conjunction with all CDBG and HOME funded rehabilitation projects, as required.

Actions planned to reduce the number of poverty-level families

CDBG, HOME, and ESG funding is integrated into existing programs that address poverty and homelessness by participating agencies and subrecipients. For example, the County provides CDBG funding to the Health Care Center for the Homeless to support multiple services, including mental health and substance abuse disorder services for low-income residents. ESG funding is directed toward agencies participating in the Central Florida Commission on Homelessness and funds vital services to assist residents living in poverty. Further programs such as job training, childcare, and programs serving residents with disabilities reduce the impact of poverty and provide for income growth for families living in poverty.

Actions planned to develop institutional structure

The Orange County Housing and Community Development Division works in conjunction with community stakeholders, local and regional public service agencies, neighborhood revitalization organizations and area housing partners who have a mutual interest in CDBG and HOME program goals and objectives. The division partners with these stakeholders on a wide range of programs including the Consolidated Planning process, Affirmatively Furthering Fair Housing actions, and the annual budget RFP process.

These community partnerships are part of an effort to assess community and regional needs and to enhance coordination of community projects and programs. Housing and Community Development continually seeks to broaden these partnerships and identify opportunities to partner with new organizations that further deepen the County's community reach and strengthen the community's social service network.

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

Public agencies, for-profit and non-profit private organizations all play a part in the provision of affordable housing, social services, capital improvements, and economic development. However, the lack of financial resources for development, operations, and support services is a significant gap to overcome. By coordinating between agencies and local organizations, the County helps to create a more comprehensive network of services and programs for its residents while reducing duplication and making efficient use of limited financial resources.

The County's Housing and Community Development Division will continue to regularly host and attend meetings with community stakeholders. The County plans to continue to attend monthly membership meetings with the Central Florida Commission on Homelessness, which helps coordinate services between homeless individuals, homeless providers, and health and mental health organizations. The County also participates annually in the Continuum of Care's Point-in-Time count.

The East Central Florida Regional Planning Council is a key partner for coordination on several critical plans, including the East Central Florida 2060 Plan and the East Central Florida Comprehensive Economic Development Strategy (CEDS). Partnerships with the Continuum of Care, which collaborates with partners across the region, are vital in planning for and implementing strategies to address homelessness. Ongoing coordination with these partners will continue to highlight shared goals and opportunities for collaboration throughout the region. Finally, the internal coordination between the County's Housing and Community Development Division and the Planning and Development Department will enable CDBG and HOME Program funding to advance goals and strategies outlined for eligible LMI areas.

Discussion:

In addition to pursuing goals listed previously in the 2022 Annual Action Plan, the County will advance the strategies described within this section to further improve community conditions for Orange County residents by increasing the capacity of service providers, reducing poverty conditions, addressing lead-based paint hazards, and generally strengthening the structure within which these actions are administered.

PROGRAM SPECIFIC REQUIREMENTS

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

Introduction:

In addition to federal guidelines, there are specific program requirements that a jurisdiction must comply with for projects planned with CDBG, HOME and ESG funds. This section of the Action Plan addresses special conditions and provisions applicable to projects funded under these programs.

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.

Program Income	
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
2a. 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.	95.00%
2b. Specify the years covered that include this Annual Action Plan.	2022 Program Year

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

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

Orange County does not intend to use other forms of investment for the HOME program that are not described in the United States Code of Federal Regulations Title 24, Part 92 Section 92.205(b).

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

Pursuant to 24 CFR 92.254 Orange County shall recapture HOME funds if the assisted housing does not continue to be the principal residence of the family for duration of the Period of Affordability. If all or any part of the property or any interest in it is sold, rented, refinanced, conveyed, or transferred, the HOME investment in the property shall be recaptured. The amount to be recaptured shall be subject to the available net sales proceeds. Recapture provisions for single-family homeownership and rehabilitation assistance are enforced in the deed and through a promissory note.

Orange County utilizes local SHIP funds for down payment assistance and is not planning to utilize HOME funds for this activity in FY 2022-2023. Under SHIP funds, if the assistance is between \$15,000 and \$35,000, there is a ten (10) year lien on the property. When HOME funds are used for down payment assistance, the amount of HOME funds subject to recapture is based on the amount of assistance identified in the note and deed that enabled the homebuyer to purchase the property. The amount of assistance provided shall be recaptured by Orange County in full upon default. In the event of a foreclosure or short sale, or transfer in lieu of foreclosure, recapture provisions will be recovered based on the net

proceeds available from the sale as established by the written agreement. In the event that there are no net proceeds from the foreclosure, repayment is not required and HOME requirements are considered satisfied.

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:

There are no plans for FY 2022-2023 to utilize HOME funds to acquire affordable units. If HOME funds are used to acquire affordable units, the amount of HOME funds subject to recapture will be based on the amount of assistance identified in the note and deed of the purchased property. The amount of HOME assistance provided shall be recaptured by Orange County in full upon resale, transfer of ownership, abandonment or as established by the written agreement.

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:

There are no plans to utilize HOME funds to refinance existing debt secured by multifamily housing.

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

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

The purpose of the ESG program is to assist with the provision of emergency shelter, housing stabilization and essential services for the homeless individuals and households and those at risk of becoming homeless, to provide street outreach, and to assist with data collection through the Homeless Management Information System (HMIS). Eligible projects and/or activities selected to be funded must be consistent with priorities and needs within Orange County identified in the Consolidated Plan, and, if funded, will become part of an Annual Action Plan.

Eligible Activities and Costs

ESG funds may be used for five program components: street outreach, emergency shelter, homelessness prevention, rapid re-housing assistance, and HMIS; as well as administrative activities (up to 7.5% of a recipient's allocation can be used for administrative activities). More specifically, The ESG funds may be used for the following:

- **Street Outreach** – Funds are intended to meet the immediate needs of unsheltered

homeless persons by connecting them with emergency shelter, housing, and/or critical health services. Eligible costs and program requirements are provided at 24 CFR 576.101.

- **Emergency Shelter** – Funds may be used for renovation of existing shelters or conversion of buildings to shelters, paying for operating costs, and providing essential services. Eligible costs and program requirements are provided at 24 CFR 576.102.
- **Homelessness Prevention** – Funds are used to prevent a person or family from moving into an emergency shelter or living in place not meant for human habitation by relocation and stabilization services and short- and/or medium-term rental assistance. Eligible costs and program requirements are provided at 24 CFR 576.103.
- **Rapid Re-Housing** – Funds are used to quickly move homeless persons into permanent housing through housing relocation and stabilization services and short- and/or medium-term rental assistance. Eligible costs and program requirements are provided at 24 CFR 576.104. The rapid re-housing assistance must be provided in accordance with the housing relocation and stabilization services requirements in § 576.105, the short- and medium-term rental assistance requirements in § 576.106, and the written standards and procedures established under § 576.400.
- **Homeless Management Information System (HMIS)** – Funds are used to cover costs associated with management and/or administration of the HMIS and comparable database costs, as specified at 24 CFR 576.107.

Program Eligibility

The minimum eligibility criteria for ESG beneficiaries are as follows: For essential services related to street outreach, beneficiaries must meet the criteria under paragraph (1)(i) of the “homeless” definition under § 576.2. For emergency shelter, beneficiaries must meet the “homeless” definition in 24 CFR 576.2. For essential services related to emergency shelter, beneficiaries must be “homeless” and staying in an emergency shelter (which could include a day shelter). For homelessness prevention assistance, beneficiaries must meet the requirements described in 24 CFR 576.103par. For rapid re-housing assistance, beneficiaries must meet requirements described in 24 CFR 576.104. Further eligibility criteria may be established at the local level in accordance with 24 CFR 576.400(e).

Income Limits

The “Extremely Low Income (ELI) families” limits do NOT apply to ESG. ESG does not use the ELI measure to establish income limits, but instead uses the 30% of Area Median Income (AMI) income limits. Subrecipients must use the 30% AMI table (provided annually by Orange County) to avoid incorrect determination of eligibility for some applicants.

- ESG income eligibility is based on the HUD income limits in effect at the time of income verification, and not on the HUD income limits that correspond with the grant year under which ESG funds were awarded.
- **Rapid Re-housing Income Requirements:** An income assessment is not required at initial evaluation. At re-evaluation, (not less than once annually), the participant’s

household annual income must not exceed 30% of area median family income, as determined by HUD, with adjustments for family size.

- **Homelessness Prevention Income Requirements:** ESG limits eligibility for homelessness prevention assistance to individuals and families with incomes below 30 percent of AMI at intake, and incomes that do not exceed 30 percent of AMI at re-evaluation (not less than once every 3 months).

Recordkeeping and Reporting Requirements

Acceptance into an ESG-funded program and/or activity should be based upon meeting program eligibility, to include meeting definition of homeless, and, when applicable, ESG income limits. All subrecipients are required to document homeless status of program participants at intake. The priority of obtaining such evidence is as follows: third-party documentation first, intake worker observations second, and certification from the person seeking assistance third. 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.

HMIS records, or comparable database used by victim service or legal service providers, are acceptable evidence of third-party documentation and intake worker observations when the HMIS retains an auditable history of all entries, including the person who entered the data, the date of entry, and the change made.

Summary of Policies and Procedures for Rapid Re-housing and/or Homelessness Prevention

The homelessness prevention and rapid re-housing assistance must be provided in accordance with the housing relocation and stabilization services requirements in §576.105, the short- and medium-term rental assistance requirements in §576.106, and the written standards and procedures established under §576.400.

The following requirements apply to **housing relocation and stabilization services**:

- a) ***Financial assistance costs:*** ESG funds may be used to pay rental application fees, security deposits, last month's rent, utility deposits, utility payments, moving costs, and amounts owed for breaking a lease to effect an emergency transfer.
- b) ***Services costs:*** ESG funds may be used to pay for housing search and placement, housing stability case management, mediation, legal services, and credit repair.
- c) ***Maximum amounts and periods of assistance:*** except for housing stability case management, the total period for which any program participant may receive the services must not exceed 24 months during any 3-year period. The limits on the assistance under this section apply to the total assistance an individual receives, either as an individual or as part of a family.

- d) ***Use with other subsidies:*** financial assistance cannot be provided to a program participant who is receiving the same type of assistance through other public sources or to a program participant who has been provided with replacement housing payments under the URA, during the period of time covered by the URA payments.

The following requirements apply to **rental assistance** provided with ESG funds:

- a) A program participant might be provided with up to 24 months of rental assistance during any 3-year period. This assistance may be short-term rental assistance, medium-term rental assistance, payment of rental arrears, or any combination of this assistance.
- Short-term rental assistance is assistance for up to 3 months of rent.
 - Medium-term rental assistance is assistance for more than 3 months but not more than 24 months of rent.
 - Payment of rental arrears consists of a one-time payment for up to 6 months of rent in arrears, including any late fees on those arrears.
 - Rental assistance may be tenant-based or project-based.
- b) Orange County reserves the right to establish the maximum levels of assistance. Should the County choose to do so, the maximum levels of assistance and any additional information pertaining to the provision of rental assistance under the rapid re-housing and homelessness prevention programs will be specified in the County's ESG Program Policies and Procedures Manual that is updated regularly.
- c) ***Use with other subsidies:*** Except for a one-time payment of rental arrears on the tenant's portion of the rental payment, rental assistance cannot be provided to a program participant who is receiving tenant-based rental assistance, or living in a housing unit receiving project-based rental assistance or operating assistance, through other public sources.
- d) ***Rent restrictions:*** rental assistance cannot not exceed the Fair Market Rent established by HUD, and it should comply with HUD's standard of rent reasonableness.
- e) ***Late payments:*** subrecipients must make timely payments to each owner in accordance with the rental assistance agreement. The subrecipient is solely responsible for paying late payment penalties that it incurs with non-ESG funds.
- f) ***Lease:*** each program participant receiving rental assistance must have a legally binding, written lease for the rental unit, unless the assistance is solely for rental arrears.
- g) ***Changes in household composition:*** the limits on the assistance under this section apply to the total assistance an individual receives, either as an individual or as part of a family.

Additional Requirements

- **Match:** Urban county recipients must match grant funds with an equal amount of contributions, which may include cash, donated buildings or materials, and volunteer services. For the specific match requirements, see 24 CFR 576.201.
- **Expenditure Limits and Deadlines:** The total amount of the recipient's fiscal year grant that may be used for street outreach and emergency shelter activities cannot exceed the greater of: (1) 60 percent of the recipient's fiscal year grant; or (2) the amount of Fiscal Year 2010 grant funds committed for homeless assistance activities. The total amount of ESG funds that may be used for administrative activities cannot exceed 7.5 percent of the recipient's fiscal year grant. All grant funds must be expended within 24 months after HUD signs the grant agreement with the recipient. Further obligation and expenditure requirements are specified at 24 CFR 576.203.
- **Data Collection and Reporting:** It is a requirement of the ESG that data on all persons served and all activities assisted under ESG are entered into the applicable community-wide HMIS in the area in which those persons and activities are located, or a comparable database, in accordance with HUD's standards on participation, data collection, and reporting under a local HMIS. If the subrecipient 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.
- **Use of the Coordinated Entry System (CES):** ESG regulations require use of a coordinated assessment tool to determine program eligibility and to ensure prioritization of services to those most in need. the local Continuum of Care has developed a Coordinated Entry System (CES) to conduct screening, assessment and referral of program participants consistent with written requirements of various programs being implemented by agencies within the Continuum.
- **Coordination between Service Providers:** On an annual basis, Orange County consults with Homeless Services Network of Central Florida (HSN), a lead agency for the local Continuum of Care (CoC), in determining allocation of ESG funds and developing performance standards and outcomes for projects and activities assisted under ESG program. The County also solicit input from HSN in reviewing applications for ESG funds received during the annual Request for Applications process, which takes place in March-April of each year. Additionally, all ESG-funded subrecipients are encouraged to participate in relevant CoC meetings and attend subcommittees to ensure coordination of services, avoid duplication, and to provide services in the most efficient manner.
- **Access to Mainstream Services:** Subrecipients receiving ESG funds for emergency shelter, homeless prevention and rapid rehousing should provide program participants with information and assist in accessing the following services if it aids in meeting identified needs of program participants: 211 local information hotline for social services; social security benefits; food stamps assistance; affordable housing database; job training programs; health services; education programs; services for victims of domestic

violence; veteran services; etc.

- **Written Standards for Provision of Assistance:** Orange County will require all subrecipients of ESG funds to create agency-level ESG policies and procedures.
- **Protection for Victims of Domestic Violence:** ESG assistance cannot be denied or terminated solely because an applicant or tenant is a victim of domestic violence, dating violence, sexual assault, or stalking applied upon enactment of VAWA 2013 on March 7, 2013.
- **Conflict of Interest:** Subrecipients must avoid any conflict of interest in carrying out activities funded by ESG, to include organizational and individual conflicts of interest. Orange County and subrecipients of ESG funds must comply with 2 CFR Parts 200.317 and 200.318 for the procurement of goods and services.
- **Monitoring of Subrecipients:** During the year, the County conducts site-specific monitoring of its ESG-funded agencies and provides technical assistance. Sub-recipients are monitored through desk monitoring, annual reviews, site visits, and contacts by various means, including meetings, correspondence, telephone and e-mail contact. Subrecipients are also required to provide their most recent annual external audit reports and copies of current insurance coverage. To supplement routine desk monitoring procedures, the County's Division conducts formal annual performance reviews of subrecipients of the ESG program.
- **Other Requirements:** All projects by subrecipients will require a project administration agreement that delineates the specific project requirements, including but not limited to, project budget, timelines, payment procedures, project outcomes and records of beneficiaries served within the term of the project agreement. Projects implemented by subrecipients are also subject to all federal requirements including but not limited to ESG regulations, fair housing laws, HUD issued certifications, and standards under 2 CFR Part 200.

During natural disasters, health emergencies, or other unpredicted events, HUD might issue additional waivers for programs administered by the Housing and Community Development Division of Orange County, to include the ESG Program. Should such waivers become available through notices issued by HUD, the County staff will evaluate their potential applicability to projects and activities funded through the ESG Program and apply for such waivers if needed. The subsequent changes to ESG Program Policies and Procedures will be made to reflect such waivers or uncommon situations.

The ESG Program Policies and Procedures Manual is updated regularly by the Housing and Community Development Divisions staff, in consultation with the Continuum of Care, and it is available to potential applicants for ESG funds during the application process, and to community partners and stakeholders providing services to homeless individuals and families and those at risk of homelessness. Orange County requires all of the subrecipient of ESG funds to become familiar with the County's ESG Program Policies and Procedures and to update their agency's policies for ESG-funded program and activities for consistency.

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

ESG regulations require use of a coordinated assessment tool to determine program eligibility and to ensure prioritization of services to those most in need. The local Continuum of Care has developed a Coordinated Entry System (CES) to conduct screening, assessment and referral of program participants consistent with written requirements of various programs being implemented by agencies within the Continuum. The CES currently effectively conducts referrals into family shelters (using the Shelter Prioritization Tool) and rapid re-housing programs for families. The local Domestic Violence shelter has a different entry process, and the CoC is working with the ESG-funded youth shelter to figure out a more coordinated referral process. There is not a developed and centralized process to rapidly re-house individuals and to conduct referrals into homelessness prevention programs.

Additionally, it is a requirements of the ESG that data on all persons served and all activities assisted under ESG are entered into the applicable community-wide Homeless Management Information System (HMIS) in the area in which those persons and activities are located, or a comparable database, in accordance with HUD's standards on participation, data collection, and reporting under a local HMIS. If the subrecipient 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 or provided to an HMIS.

For all ESG funded providers of emergency shelter, homelessness prevention and rapid rehousing services, Orange County required monthly HMIS (or compatible database) reports to be submitted as part of the reimbursement requests. Annual performance reporting for all ESG-funded agencies is done using the Sage HMIS Reporting Repository.

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

The process for making sub-awards under ESG is performed on a competitive basis. Once Orange County receives HUD's funding notification, the Request for Applications (RFA) process begins with a public notice that is published in the local newspapers announcing the expected ESG award and dates for the technical assistance workshops for prospective applicants. The RFA process, which is open for state certified 501(c)(3) organizations who have been in operation for a minimum of two (2) years, lasts approximately 45 to 60 days. Once the applications are received, staff from the Housing and Community Development Division will review the applications and make recommendations for funding to the members of the Community Development Advisory Board (CDAB). It is a general practice to solicit input from the Homeless Services Network of Central Florida, Inc. (HSN), the lead agency for the local CoC, in review of the ESG applications received. HSN is also informed of all of

the public hearings and provided with a copy of the draft Action Plan for review and comments, and to distribute the copy to its network of homeless providers and stakeholders.

With many aspects that must be considered in selecting the projects that will be funded with federal funds under the Action Plan, including the Emergency Solutions Grant (ESG), Orange County utilized the following process to determine if federal funds will be used to fund an activity with ESG:

Step #1: Determine if the activity is eligible in accordance to federal statutes.

Step #2: Determine if any of the proposed activities fall within a category explicitly ineligible (such as assistance for the general conduct of government, political or religious activities paid with HUD funds or others identified in the statutes).

Step #3: Determine if beneficiaries of the project are eligible. The ESG activity benefits eligible homeless persons in accordance to the provisions established in Part 576.2.

Step #4: Review the proposed costs of the activity to determine if they appear to be necessary and reasonable. Conduct a financial risk analysis in accordance to 2 CFR Part 200 Uniform Administrative Requirements, Cost Principles and Audit Requirements.

Step #5: Determine if there is a need to fund the project with ESG funds.

Step #6: Determine the organization's experience and capacity to carry out the project.

Step #7: Determine funding availability for the project.

A public hearing is held in the month of June to solicit comments from the public about the recommendations for funding. The Orange County Board of County Commissioners must approve all funding recommendations prior to final submission to HUD, on or before August 15 of any given fiscal year.

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.

Consultation with the Continuum of Care is critical for the development of homeless strategies for the Consolidated Plan and Annual Action Plan. The CoC's lead agency, the Homeless Services Network of Central Florida, Inc., also participates in the evaluation of project proposals. Additionally, recommendations are received from homeless agencies and community networks through our citizen participation process. Other consultations include the Affordable Housing Advisory Board and the Community Development Advisory Board. Both boards are composed of representatives from each district in Orange County, and an at-large member appointed by the Mayor.

Orange County is an active participant of the local CoC, currently known as the Central Florida Commission on Homelessness, and the County staff regularly participates in its monthly membership meetings, regional meetings pertaining to homelessness and affordable housing, subcommittees and focus groups to discuss homeless issues that are used in considering policies and funding decisions. Finally, the County staff participates in review of the Continuum-wide ESG policies and standards for a variety of homeless programs and activities.

5. Describe performance standards for evaluating ESG.

Orange County consults with Homeless Services Network of Central Florida, Inc., the lead CoC agency, in creating performance standards for evaluating the proposed ESG programs and activities to ensure that the funds are spent in the most effective and efficient manner. Additionally, the performance standards aid in determining the subrecipients' success in achieving the following:

- Targeting individuals and families in most need of services and assistance (measured by using the prioritization tools developed by the CoC);
- Reducing the number of individuals and families living on the streets, in places not meant for human habitation, and in emergency shelters (measured by annual Point-in-Time counts of shelters and unsheltered populations);
- Shortening the time individuals and families spent homeless (measured by using HMIS at intake, and the CES tool to prioritize placing qualified individuals and families who are most vulnerable into housing); and
- Reducing housing barriers and improving housing stability of individuals and families (emphasized by the Housing First approach; measured by HMIS/connecting persons to mainstream resources, increasing their income while in the programs, improving self-sufficiency).

These performance standards are intended to complement and contribute to the Continuum of Care program performance measures detailed in Section 427 of the McKinney-Vento Act, as amended by the HEARTH Act, which generally include the following:

- The length of time individuals and families remain homeless;
- The length of time individuals exiting homelessness experience additional spells of homelessness;
- The thoroughness of grantees in the geographic area in reaching homeless individuals and families;
- Overall reduction in the number of homeless individuals and families;
- Jobs and income growth for homeless individuals and families;
- Success at reducing the number of individuals and families who become homeless; and
- Other accomplishments by the recipient related to reducing homelessness.