

Consolidated Annual  **Performance Evaluation
Report (CAPER)**

**US Department of Housing and Urban Development
HOME Investment Partnerships Program**

**Program Year 2021
July 1, 2021 to June 30, 2022**

Greenwood County HOME Consortium
Counties of Greenwood, Abbeville, Edgefield, Laurens, McCormick, Saluda
State of South Carolina

September 28, 2022



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CR-05 - Goals and Outcomes

Progress the jurisdiction has made in carrying out its strategic plan and its action plan.

91.520(a)

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

The assessment provided in this Consolidated Annual Performance and Evaluation Report (CAPER) covers Program Year (PY) 2020, which is July 1, 2021 - June 30, 2022. Greenwood County is the lead entity for the Greenwood County HOME Consortium (Consortium) which consists of six counties in South Carolina including Greenwood, Abbeville, Edgefield, Laurens, McCormick, and Saluda. Through an administrative agreement, the Upper Savannah Council of Governments (COG) administers the HOME Investment Partnership Program (HOME) funded by the Department of Housing and Urban Development (HUD) on behalf of the Consortium.

In March of 2017, the Consortium notified HUD of its decision not to seek renewal upon expiration of its three-year commitment ending June 2017. It wished to return the PY16 funding and not accept any future HOME funding. The Consortium indicated that all existing commitments and compliance obligations would be honored. This report details those existing commitments which were completed during PY19.

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

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

Goal	Category	Source / Amount	Indicator	Unit of Measure	Expected – Strategic Plan	Actual – Strategic Plan	Percent Complete	Expected – Program Year	Actual – Program Year	Percent Complete
Housing Development	Affordable Housing	HOME: \$1,176,438	Rental units constructed	Household Housing Unit	12	29	241.00%	NA*	0	NA*
Housing Development	Affordable Housing		Homeowner Housing Added	Household Housing Unit	10	20	200.00%	NA	0	NA
Housing Development	Affordable Housing		Direct Financial Assistance to Homebuyers	Households Assisted	8	0	0.00%	NA	0	NA
Preservation of existing housing stock	Affordable Housing	HOME: \$1,176,439	Rental units rehabilitated	Household Housing Unit	6	0	0.00%	NA	0	NA
Preservation of existing housing stock	Affordable Housing		Homeowner Housing Rehabilitated	Household Housing Unit	30	28	93.33%	NA	0	NA
Program delivery	Affordable Housing	HOME: \$261,430	Other	Other	1	3	300.00%	NA	0	NA
Support efforts for homeless, special needs	Homeless Non-Homeless Special Needs	HOME: \$0	Other	Other	1	1	100.00%	NA	0	NA

Table 1 - Accomplishments – Program Year & Strategic Plan to Date

Note: The Consortium did not accept an allocation for PY21; therefore, an Annual Action Plan (AAP) was not submitted. Consequently, in Table 1 above, there are no PY21 production goals (“Expected”) from the AAP or percentage completed amounts (“Percentage Complete”). The

numbers for “Actual Program Year” indicate the number of units completed during the 2021 program year, all of which were committed from allocations prior to PY21.

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

The Consortium does not receive CDBG funding.

The high priority needs identified in the Consolidated Plan for the HOME program are as follows:

1. Housing rehabilitation for existing homeowners
2. New Construction ownership
3. New Construction rental
4. Homebuyer Assistance
5. Rental Rehab
6. Homelessness
7. Non Homeless with Special Needs

1. Housing Rehabilitation for Existing Homeowners

The Consortium has helped preserve the area's affordable housing stock by providing grants, deferred loans, and/or low-interest loans to low and moderate-income homeowners for substantial rehabilitation of their homes.

2. New Construction ownership

The Consortium has expanded the area's affordable homebuyer opportunities by providing grants, deferred loans and/or low-interest loans to low and moderate-income households to purchase their own homes.

3. New Construction rental

The Consortium has sought to preserve and expand available affordable housing opportunities in cooperation with qualified developers.

4. Homebuyer Assistance

Moderate-income families can benefit from down payment and closing assistance through HOME funding giving them greater access to opportunities for affordable home ownership and housing choice.

5. Rental Rehab

Agencies working with low- to moderate-income families struggle to find affordable rental units within the Consortium area. Repair of affordable rental units provides more housing choice and helps address the cost burden of low-income households.

6. Homelessness

HOME funding cannot directly address the needs of the homeless; however, the Consortium assists direct-provider organizations when possible.

7. Non Homeless with Special Needs

The Consortium has addressed this goal through its housing rehabilitation program by giving special consideration to households with individuals with special needs and/or veterans. The Consortium has not expended any additional HOME funding to achieve this goal.

CR-10 - Racial and Ethnic composition of families (beneficiaries) assisted

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

91.520(a)

Racial /Ethnic Population	# of Beneficiaries
White	47
Black or African American	233
Asian	0
American Indian or American Native	0
Native Hawaiian or Other Pacific Islander	0
Total	280
Hispanic	0
Not Hispanic	280

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

Narrative

Overall, the Consortium has completed 108 affordable housing units from the formation of the Consortium in FY09 through FY21, June 30, 2022. This number includes 37 owner-occupied rehabs, 29 single-family homes for homebuyers, and 42 new rental units.

The completed projects have assisted 280 beneficiaries. The beneficiaries included 47 White and 233 African-American individuals. Other beneficiary characteristics included 44 elderly, 44 disabled, and 79 households headed by females. All households had income levels at or below 80% AMI.

CR-15 - Resources and Investments 91.520(a)

Identify the resources made available

Source of Funds	Source	Resources Made Available	Amount Expended During Program Year 2019
HOME	Public – Federal	\$ 0	\$ 0

Table 3 – Resources Made Available

Narrative

HOME funding is the only Federal allocation available to the Consortium. The Consortium did not accept an allocation in PY17, PY18, PY19, PY20, or PY21.

In March of 2017, the Consortium notified HUD of its decision not to seek renewal upon expiration of its three-year commitment ending June 2017. The Consortium stated that its intent to honor all commitments funded from allocations up to and including PY15, to return its PY16 funding, and not to accept HOME funding for PY17 or thereafter. The Consortium indicated that all commitments and compliance obligations would be honored.

After all financial commitments were fulfilled and the remaining funding returned to HUD, the Consortium has ended.

Identify the geographic distribution and location of investments

Target Area	Planned Percentage of Allocation	Actual Percentage of Allocation	Narrative Description
Consortium Area	100%	100%	HOME funding

Table 4 – Identify the geographic distribution and location of investments

Narrative

The Consortium did not target specific areas in the region because the need for affordable housing is widespread in the six-county area and similar conditions exist in all areas. In previous program years projects have been completed in all six Consortium member counties: Greenwood, Abbeville, Edgefield, McCormick, Laurens, and Saluda, SC. The location of projects is often driven by the developers and non-profits who propose the projects, and by referrals received from nonprofit and health service organizations.

Leveraging

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

The Consortium service area does not include any Entitlement Cities/Counties and all local governments must compete for other funding sources to augment HOME funds. Other competitive funding sources available to local units of government within the consortium service area are:

- State HOME funds
- State CDBG funds
- State Housing Trust Funds
- USDA Rural Development Housing Preservation Grant funds
- Federal Home Loan Bank of Atlanta
- Low-income Housing Tax Credits
- Private foundations
- Donations of volunteer labor and materials

The above funds are available on a competitive basis. Despite this variety of funding options, the need for decent, safe, and affordable housing within the region is far greater than the HOME program or the above options can address.

The Consortium members do not have allocations of Section 8 funds, Low Income Tax Credits, or McKinney-Vento Homeless Assistance Act funding.

The Consortium has carried out affordable housing activities with funding primarily provided through the HOME program as funded through the US Department of Housing and Urban Development. No publicly-owned land or property in the Consortium region was used in PY20 for HOME projects.

HOME regulations require a 25 percent non-federal match for all projects funded. All participating jurisdictions (PJs) must contribute or match 25 cents for each dollar of HOME funds spent on affordable housing. As PJs draw funds from HOME Investment Partnership Funds, they incur a match liability, which must be satisfied by the end of each Federal fiscal year.

The HOME statute provides for a reduction of the matching contribution requirement under three conditions:

- Fiscal distress
- Severe fiscal distress
- Presidentially-declared major disasters covered under the Stafford Act

The criteria for fiscal and severe fiscal distress are based on (1) family poverty rate, and (2) per capita income (PCI). When a local jurisdiction meets one of these distress criteria, it is determined to be in

fiscal distress and receives a 50 percent reduction of match. If a local jurisdiction satisfies both of the distress criteria, it is determined to be in severe fiscal distress and receives a 100 percent reduction of match.

The Consortium was not included on the match waiver reduction list for FY21 as it has ceased accepting HOME funding and did not receive an allotment in either FY17, FY18, FY19, FY20, or FY21.

As the Consortium is nearing an end, no match was accumulated during PY21; however, the match report below illustrates that a substantial amount of match has been accumulated, primarily as a result of volunteer hours and donated materials and services provided by the local Habitat chapters.

Fiscal Year Summary – HOME Match	
1. Excess match from prior Federal fiscal year	\$ 773,262.96
2. Match contributed during current Federal fiscal year	\$ 0
3. Total match available for current Federal fiscal year (Line 1 plus Line 2)	\$ 773,262.96
4. Match liability for current Federal fiscal year	\$ 0
5. Excess match carried over to next Federal fiscal year (Line 3 minus Line 4)	\$ 773,262.96

Table 5 – Fiscal Year Summary - HOME Match Report

Match Contribution for the Federal Fiscal Year								
Project No. or Other ID	Date of Contribution	Cash (non-Federal sources) \$	Foregone Taxes, Fees, Charges \$	Appraised Land/Real Property \$	Required Infrastructure \$	Site Preparation , Construction Materials, Donated labor \$	Bond Financing \$	Total Match \$
N/A	N/A	\$ 0	\$ 0	\$ 0	\$ 0	\$ 0	\$ 0	\$ 0

Table 6 – Match Contribution for the Federal Fiscal Year

HOME MBE/WBE report

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

Table 7 – Program Income

Minority Business Enterprises and Women Business Enterprises – Indicate the number and dollar value of contracts for HOME projects completed during the reporting period						
	Total	Minority Business Enterprises				White Non-Hispanic
		Alaskan Native or American Indian	Asian or Pacific Islander	Black Non-Hispanic	Hispanic	
Contracts						
Dollar Amount	\$ 0	\$ 0	\$ 0	\$ 0	\$ 0	\$ 0
Number	0	0	0	0	0	0
Sub-Contracts						
Dollar Amount	\$ 0	\$ 0	\$ 0	\$ 0	\$ 0	\$ 0
Number	0	0	0	0	0	0
	Total	Women Business Enterprises	Male			
Contracts						
Dollar Amount	\$ 0	\$ 0	\$ 0			
Number	0	0	0			
Sub-Contracts						
Dollar Amount	\$ 0	\$ 0	\$ 0			
Number	0	0	0			

Table 8 - Minority Business and Women Business Enterprises

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

Table 9 – Minority Owners of Rental Property

Relocation and Real Property Acquisition – Indicate the number of persons displaced, the cost of relocation payments, the number of parcels acquired, and the cost of acquisition		
Parcels Acquired	0	\$ 0
Businesses Displaced	0	\$ 0
Nonprofit Organizations Displaced	0	\$ 0
Households Temporarily Relocated, not Displaced	0	\$ 0

Households Displaced	Total	Minority Property Enterprises				White Non-Hispanic
		Alaskan Native or American Indian	Asian or Pacific Islander	Black Non-Hispanic	Hispanic	
Number	0	0	0	0	0	0
Cost	\$ 0	\$ 0	\$ 0	\$ 0	\$ 0	\$ 0

Table 10 – Relocation and Real Property Acquisition

CR-20 - Affordable Housing 91.520(b)

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

	One-Year Goal	Actual
Number of homeless households to be provided affordable housing units	NA	0
Number of non-homeless households to be provided affordable housing units	NA	0
Number of special-needs households to be provided affordable housing units	NA	0
Total	NA	0

Table 11 – Number of Households

	One-Year Goal	Actual
Number of households supported through rental assistance	NA	0
Number of households supported through the production of new units	NA	0
Number of households supported through the rehab of existing units	NA	0
Number of households supported through the acquisition of existing units	NA	0
Total	NA	0

Table 12 – Number of Households Supported

Note: The Consortium did not accept an allocation for PY21; therefore, an Annual Action Plan (AAP) was not submitted. Consequently, in Table 12 above, there are no PY21 production goals (“Expected”) from the AAP or percentage completed amounts (“Percentage Complete”).

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

In an effort to sustain affordable, safe, and decent housing for low-income citizens, in PY21 the Consortium continued to work toward its Consolidated Plan goals of retaining affordable housing stock.

Discuss how these outcomes will impact future annual action plans.

No impact as it is not anticipated that the Consortium will accept any future HOME allocations nor file any future Annual Action Plans related to HOME funding.

Include the number of extremely low-income, low-income, and moderate-income persons served by each activity where information on income by family size is required to determine the eligibility of the activity.

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

Table 13 – Number of Persons Served

Narrative Information

The Consortium does not receive CDBG funding; therefore, no CDBG funding was disbursed by the Consortium.

The income levels of the beneficiaries/units completed in PY21 can also be further broken down by the types of activities as follows:

Extremely Low-income: 0 beneficiaries/0 units

Owner-occupied rehab: 0 beneficiaries/0 units

Homebuyer: 0 beneficiaries/ 0 units

Renter: 0 beneficiaries/0 units

Total: 0 beneficiaries/0 units

Low-income:

Owner-occupied rehab: 0 beneficiary/0 units

Homebuyer: 0 beneficiaries/0 units

Renter: 0 beneficiaries/ 0 units

Total: 0 beneficiaries/0 unit

Moderate-income:

Owner-occupied rehab: 0 beneficiaries/0 units

Homebuyer: 0 beneficiaries/0 units

Renter: 0 beneficiaries/0 units

Total: 0 beneficiaries/0 units

There were no other HOME-assisted beneficiaries for Consortium projects completed in PY21. There were no homeless beneficiaries of the projects completed in PY21.

All completed units met the definition of affordable housing from Section 215 of the Cranston-Gonzalez National Affordable Housing Act, as amended, including:

Owner-occupied rehab: 0 beneficiaries/0 units

Homebuyer: 0 beneficiaries/0 units

Renter: 0 beneficiaries/0 units

Total: 0 beneficiaries/0 units

The Consortium had sought to address the jurisdiction's worst-case needs and the needs of persons with disabilities primarily through its owner-occupied rehab program by giving particular consideration to eligible households that include veterans, the elderly, and the disabled.

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

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

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

The Consortium does not receive funding for activities concerning homelessness; however, when possible, it supports the organizations that provide services to homeless populations through technical assistance. For example, in 2020, the Consortium completed an Environmental Review on behalf of Meg's House, the regional Continuum of Care (CoC) agency which seeks to end homelessness. The agency administers three housing programs in a five-county area and was required to submit Environmental Reviews for each program before it could begin implementation of its updated five-year plan.

Addressing the emergency shelter and transitional housing needs of homeless persons

The Consortium does not receive funding for activities concerning homelessness; however, when possible, it supports the organizations that provide services to homeless populations through technical assistance. For example, in 2020, the Consortium completed an Environmental Review on behalf of Meg's House, the regional Continuum of Care (CoC) agency which seeks to end homelessness. The agency administers three housing programs in a five-county area and was required to submit Environmental Reviews for each program before it could begin implementation of its updated five-year plan.

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

The Consortium does not receive funding for activities concerning homelessness; however, when possible, it supports the organizations that provide services to homeless populations through technical assistance. For example, in 2020, the Consortium completed an Environmental Review on behalf of Meg's House, the regional Continuum of Care (CoC) agency which seeks to end homelessness. The agency administers three housing programs in a five-county area and was required to submit Environmental Reviews for each program before it could begin implementation of its updated five-year plan.

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 Consortium has assisted families and individuals avoid homelessness by improving the affordable housing stock in the Consortium jurisdiction including owner-occupied home rehabilitation, new construction for homebuyers, and new construction for rental units through funding to CHDOs.

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

Actions taken to address the needs of public housing

In addition, the Consortium assisted public housing agencies through technical assistance when possible. For example, in 2014, 2015, and 2017 the Consortium assisted the Greenwood Public Housing Authority (PHA) by doing completing Environmental Reviews for their three properties. The Environmental Reviews included all activities in their five-year plan and updates.

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

The Consortium partnered with Habitat for Humanity for its homebuyer program. The Greenwood Area Habitat for Humanity has a broad outreach program through its newsletter, website, Facebook page, ReStore, newspaper articles, and information sessions. In addition, potential homeowners are required to participate in homebuyer education classes to prepare themselves for the obligations of homeownership. The Consortium coordinates with Habitat staff to verify the eligibility of interested households for homebuyer projects.

Actions taken to provide assistance to troubled PHAs

There are no troubled PHAs in the Consortium jurisdiction.

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

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

The cost of housing or the incentives to develop, maintain, or improve affordable housing in the region are affected by land use controls, tax policies affecting land, zoning ordinances, building codes, fees and charges, growth limitations, and policies affecting the return on residential investment.

The Consortium was composed of multiple units of local governments including counties and municipalities. The Consortium as a PJ does not have any jurisdiction in the local policies of its members including zoning, land use, or code enforcement. However, the Consortium is administered by the Upper Savannah COG, which provided technical and planning assistance including ADA compliance, hazard mitigation, and economic development among others to regional counties and municipalities. The staff remains in close contact with regional political and agency leadership and encourages Consortium members to be aware of local conditions that may pose barriers to affordable housing and address any situation that could prevent the development of affordable housing. The Consortium has long supported qualified CHDO developers who apply for HOME funding to construct affordable housing within the region. It has also supported the efforts of other partners such as local chapters of Habitat for Humanity in their efforts to construct affordable housing and provide education and awareness of issues concerning affordable housing.

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

Recognizing that limited HOME dollars needed to be focused where the need is greatest, the Consortium allocated funding to reduce the identified housing need of cost burden. Funding for projects was allocated to owner-occupied rehab in order to preserve existing housing stock and to new construction of affordable housing for homebuyers and renters. These projects directly benefited low- to moderate-income residents and serve those who have the greatest need, including areas with the greatest concentrations of poverty.

The Consortium encouraged the support of local service providers that are currently working with the underserved in the region. This includes the local senior centers that provide services and some transportation services to area seniors. The Consortium also continues to work with CHDOs and nonprofits that provide housing counseling and credit counseling to low- to moderate-income families.

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

In 1978, lead-based paint (LBP) was banned for use in residential construction because it can be hazardous if ingested and is particularly dangerous to young children. According to the South Carolina Department of Health and Environmental Control, houses built before 1950 are very likely to contain lead-based paint, those built between 1950 and 1978 are less likely to contain LBP, and those built after 1978 are unlikely to contain LBP.

The data indicates that approximately half of the housing units (41,955) in the Consortium area were built prior to 1980 including 50% of owner-occupied units and 55% of rental units. Among units constructed prior to 1980, 38% of owner-occupied units (22,582) and 38% of rental units (8,402) were built between 1950-1979. According to SC DHEC, these units are at risk, but are less likely to contain lead paint. Among the units built before 1950, there are 7,324 owner-occupied units (12%) and 12,357 rental units (17%). These units are more likely to contain LBP which can pose a health risk to occupants, particularly children and pregnant women.

All units selected by the Consortium for HOME assistance that were built prior to 1978 are tested for LBP before any work orders are finalized. Appropriate measures are undertaken to inform the owner/occupants of any hazards, to abate identified hazards, and to provide a clearance of all units at completion of the project.

The Consortium remains committed to helping combatting the potential hazards of LBP and maintains the following policies concerning LBP in accordance with Federal guidelines

- Requires LBP risk assessments, reductions, and abatements, as outlined in Federal legislation, by all those participating in the HOME program or utilizing HOME program funds.
- Encourages and instructs property owners in preventative property maintenance to ensure that LBP hazards are not further exacerbated, i.e.,: keeping painted surfaces intact and free of flaking, chipping or peeling paint; maintaining walls and other surfaces in structurally sound condition; painting periodically; and controlling moisture and preventing water damage.
- Provides information and technical assistance to CHDOs and other recipients of HOME funds.
- Notifies residents and owners of all houses receiving HOME assistance of the hazards of LBP.
- Coordinates efforts with SCDHEC for testing and referral when lead hazards are addressed in units which house children.

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

HOME funding was used to improve the housing conditions of those in poverty. The Consortium's analysis of housing problems conducted for the development of the current five-year Consolidated Plan indicated that the most common housing problem among low- to moderate-income households in the

Consortium area with at least one housing problem was severe cost-burden (46%) followed by cost burden (42%). HOME-funded projects directly helped alleviate cost burden on families by stabilizing their housing costs at an affordable level which allows them to redirect their limited funds toward other pressing needs. In this sense, all housing projects undertaken by the Consortium work toward reducing poverty. The Consortium also supports the agencies that serve and support families in poverty.

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

The Consortium is administered by the Upper Savannah COG which also administers programs related to Aging, Workforce Development, Economic Development, Government Services, and Community Development. The Consortium communicates and coordinates with various service agencies, government departments, businesses, local municipalities, and special needs boards and commissions to find opportunities to serve the citizens of region.

The employees of the Upper Savannah COG communicate on a regular basis with County and Municipal leadership and staff as well as with public and private agencies related to home health care, housing, homelessness, unemployment, infrastructure, and social services. The frequent open communication present in these relationships is a key factor to the smooth, efficient operation of the program. The Consortium actively continues to foster these relationships in order to maintain the success and stability of the HOME program.

Consortium staff also regularly attend in-person and web-based training sessions for ongoing professional development.

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

In the Consortium region, there are a number of public, private, and social service agencies which serve low- to moderate-income households.

Agencies with services for low- to moderate-income citizens to assist in the reduction of poverty rates include Upper Savannah Agency on Aging, Upper Savannah Workforce Investment Agency, United Way, Salvation Army, Goodwill Industries, Soup kitchen, Food pantry, Greater Greenwood United Ministry Crisis Ministry and Free Medical Clinic, Healthy Learners, and GLEAMNS, among others.

The Consortium has developed strong working relationships with many agencies that offer housing to low-to-moderate income citizens including:

- Greenwood Area Habitat for Humanity
- Laurens County Habitat for Humanity

- Nehemiah Community Revitalization Corporation
- Homes of Hope
- Greenwood Housing Authority

The Consortium also strived to remain informed and maintain positive relationships among other area agencies with housing services including Pathway House Homeless Connie Maxwell Children’s Home, Thornwell Home for Children, Burton Center group homes for the disabled, MEG’s House shelter for domestic violence, Eagle’s Nest apartments for the mentally ill, Housing Authority of Abbeville for public housing, SC Regional Housing Authority No.1 for public housing, and A Place for Us Crisis Pregnancy group home.

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

The following activities were undertaken during the program year to help educate the public and remove barriers to Fair Housing choice in spite of not receiving any HOME funding:

Ensured that Fair Housing posters were displayed in all six county office buildings in the Consortium area and most of the local towns/cities.

Used Fair Housing logo on all publications.

Recognized Fair Housing Month by Council resolution passed March 2022 and published in the Index-Journal regional newspaper in April 2022.

Displayed FH poster at Courthouse.

Created FH information center to distribute FH materials to the public.

Discussed Fair Housing at public hearings where citizens are in attendance.

Provided information on Fair Housing in a public location at Self Regional Healthcare.

CR-40 - Monitoring 91.220 and 91.230

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

The Consortium conducted periodic monitoring and evaluation of partners with active projects to ensure that programs are carried out in accordance with the Consolidated Plan, written funding agreements, and HOME Program regulations.

The Consortium implemented its monitoring program in accordance with requirements set forth by HUD. Monitoring of the implementation of the Consolidated Plan and Annual Action Plan includes periodic telephone contacts, written communications including email correspondence, data collection, submission of reports, analysis of report findings, periodic meetings and technical assistance, and evaluation sessions. General procedures used when monitoring partner organizations include:

Meetings with appropriate officials including an explanation of the purpose of the monitoring process.

Review of appropriate materials such as reports and documents that provide more detailed information on the programs and their status.

Interviews with members of staff to discuss performance.

If appropriate and necessary, a closed conference with program officials.

Provision of comments and recommendations as needed.

HUD regulations require ongoing compliance for projects with an affordability period. In rental projects, PJs must ensure that HOME units remain in compliance with property standards through periodic inspections. PJs must also review documentation from HOME grantees on an annual basis concerning rental rates, proposed rent increases, household income, and unit mix. In order to comply with these requirements, the Consortium conducts periodic on-site inspections and requires annual submission of rent approval and unit compliance documentation.

To date, the Consortium has invested HOME funding in the construction of forty-two rental units located in Greenwood, Clinton, and Laurens, SC. Upon completion, the Consortium conducted a final inspection of all units. The City/County also conducted a final inspection and issued Certificates of Occupancy. No new projects were completed in PY21, so there were no site visits for construction purposes. No regular property inspections were conducted in PY21 due to Corona Virus home visit restrictions.

The Consortium requires that grantees submit Annual Rent Approval and Unit Compliance documentation for all rental units along with supporting documentation that includes the applicable HUD Income Limits, HUD Rent Limits, current utility allowance, and evidence of current property insurance.

See PY20 Rent Approval forms and Unit Compliance forms for rental projects in Attachment 1: Monitoring.

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

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

The Consortium did not accept new funding for PY21; therefore, it did not submit an Annual Action Plan or hold any public hearings associated with the Annual Action Plan.

CR-50 - HOME 91.520(d)

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

On-site inspections were put on hold due to the COVID-19 pandemic. Resolution of maintenance issues continued with proper safety precautions on an as-needed basis.

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

As required by 24 CFR Part 108, Compliance Procedures for Affirmative Fair Housing Marketing, all project owners of five or more HOME assisted units are required to adopt an approved Affirmative Fair Housing Marketing Plan (AFHMP). This plan outlines the steps to market the units, advertises the availability, and encourages applications on an equal opportunity basis. This includes the EEO slogan, logo or statement in all advertising as well as a HUD Fair Housing poster in the offices where rental activity takes place. Marketing efforts are made to reach those least likely to apply for these housing units. AFHMPs are submitted with the organization's application for HOME funding and are reviewed and approved by Consortium staff.

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

The Consortium does not generate program income. The only program income it receives is an insignificant amount (less than \$5 per year) from earned interest.

Describe other actions taken to foster and maintain affordable housing. 91.220(k)

(STATES ONLY: Including the coordination of LIHTC with the development of affordable housing). 91.320(j)

The Consortium no longer receives HOME funding, but continues to monitor rent levels for the required period of time.

Attachment 1: Monitoring

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