



Annual Action Plan - Program Year 2019
Community Development Department

Jean Sullivan, Director

Substantial Amendment to the PY2019 Annual Action Plan for CARES Act funding

NOVEMBER 2020 UPDATE: The U.S. Department of Housing and Urban Development (HUD) will provide additional funding to Charleston County Community Development Department from the CARES Act to be used to prevent, prepare for, and respond to the coronavirus pandemic (COVID-19). Funds are anticipated to be received for Community Development Block Grant (CDBG)-CV in the amount of \$1,793,877. Below is a summary of all the changes that will occur under this substantial amendment:

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

- In “Introduction,” added the following text:
(November 2020 update): Additional Community Development Block Grant (CDBG)-CV funds in the amount of \$1,793,877 were made available.
- Under “2. Summarize the objectives and outcomes identified in the Plan,” the following was updated:
Direct Services to the LMI Community
 - (November 2020) With additional CARES Act funding, assist 250 households with financial assistance

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

- Add funds for the Community Development Block Grant (CDBG)-CV in the amount of \$1,793,877 (for a cumulative amount for all allocation rounds of \$2,883,893)

AP-20 Annual Goals and Objectives - 91.220(c)(3)&(e)

- Under “Direct Services to the LMI Community,” increased funding allotted by \$1,793,877 (for a cumulative amount for all allocation rounds of \$2,883,893) and increased number of households under public service activities for Low/Moderate Income Housing Benefit to 502 households.

AP-35 Projects - 91.220(d)

- Under “CV-Public Services for Charleston County Residents,” increased funding allotted by \$1,793,877 (for a cumulative amount for all allocation rounds of \$2,883,893) and increased number of households under public service activities for Low/Moderate Income Housing Benefit from 170 to 420.

Added the following activities:

Organization Name	Award Amount
Housing Assistance Payments	
Charleston County Community Development	\$1,793,877

Previous Substantial Amendments to include CARES Act funding

July 2020 update:

Under the CARES Act, Emergency Solutions Grant (ESG)-CV funds in the amount of \$890,215 were made available.

Organization Name	Award Amount
Homelessness prevention	
Family Services, Inc. DBA Origin SC	\$ 20,000
Charleston Trident Urban League	\$ 207,838
Florence Crittenton Programs of SC	\$ 113,162
Rapid Re-Housing	
One80 Place	\$ 220,503
Florence Crittenton Programs of SC	\$ 64,162
Shelter Operations	
One80 Place	\$ 129,550
Charleston Orphan House dba Carolina Youth Development Center	\$ 135,000

May 2020 update:

CARES Act funding was received for the Community Development Block Grant (CDBG) in the amount of \$1,090,016 and the Emergency Solutions Grant (ESG) in the amount of \$535,900.

Services for Charleston County Residents - \$1,090,016.

- Added the following CDBG-CV activities:

Housing Assistance Payments	Award Amount
Humanities Foundation (ShelterNet)	\$50,000
East Cooper Community Outreach Financial Assistance	\$118,145
Origin SC- Financial Assistance	\$287,728
James Island Outreach	\$30,000
Charleston Trident Urban League	\$110,000
Access to Essential Medical Services and Medication	
East Cooper Community Outreach Rx Assistance	\$48,000
Access to Healthy Food	
East Cooper Meals on Wheels	\$10,000
Lowcountry Food Bank	\$240,000
Charleston Area Senior Citizens Services Inc.	\$54,143
Essential services for homeless including legal services	
Charleston Pro Bono Legal Services, Inc.	\$100,000
Hotel/Motel Vouchers	
Origin SC- Hotel/Motel Vouchers	\$42,000

- Added the following ESG-CV activities:

Rapid Re-Housing	One80 Place: \$279,980
Shelter	One80 Place: \$255,920

Executive Summary

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

1. Introduction

Each year Charleston County submits an Action Plan explaining how the U.S. Department of Urban Development (HUD) resources will be used to improve communities throughout the County (outside the city limits of Charleston). This is an annual implementation plan of the Five-Year Consolidated Plan addressing the housing and community development needs in Charleston County. The needs and goals were identified through collaboration with participating jurisdictions and other public and private organizations. The goals of the Consolidated Plan and Annual Action Plan are targeted to low-to-moderate income residents and households in Charleston County.

This is the County's fourth Annual Action Plan from the 2016-2020 Consolidated Plan. It identifies activities that the County will undertake in the 2019-2020 Program Year to address priority needs in the community. The Plan describes the resources available, the programs and projects to be funded, and the proposed accomplishments.

The Action Plan, developed with the input of citizens serves four major functions:

1. It is the County's application for funds available through the three HUD Formula Programs: Community Development Block Grant (CDBG), Home Investment Partnerships Program (HOME), and Emergency Solutions Grant (ESG);
2. It is the annual planning document, built through public input and participation, and an open Request For Application (RFA) process;
3. It lays out expected annual funding resources, the method of fund distribution, and the actions the County will follow in administering HUD Programs; and,
4. It provides accountability to citizens for the use of the funds and allows HUD to measure program performance.

Substantial Amendment (May 2020): The County of Charleston submitted a Substantial Amendment to the Program Year (PY) 2019 Annual Action Plan to HUD. The proposed amendment is an addition of grant funding. The U.S. Department of Housing and Urban Development (HUD) will provide funding to Charleston County Community Development Department from the CARES Act to be used to prevent, prepare for, and respond to the coronavirus pandemic (COVID-19). Funds received for the Community Development Block Grant (CDBG) in the amount of \$1,090,016 and the Emergency Solutions Grant (ESG) in the amount of \$535,900. **(July 2020 update):** Additional Emergency Solutions Grant (ESG)-CV funds in

the amount of \$890,215 were made available. **(November 2020 update)**: Additional Community Development Block Grant (CDBG)-CV funds in the amount of \$1,793,877 were made available.

2. Summarize the objectives and outcomes identified in the Plan

This could be a restatement of items or a table listed elsewhere in the plan or a reference to another location. It may also contain any essential items from the housing and homeless needs assessment, the housing market analysis or the strategic plan.

Throughout the Consolidated planning process, Charleston County identified four priority needs:

- Affordable Housing and Suitable Living Options
- Infrastructure Improvements and Development
- Social Services to Benefit the LMI (Low- and Moderate-Income) Community
- Homeless Needs

To meet those needs, the County is planning to achieve the following goals and outcomes over the next year:

- Well and Septic Improvements - Assist 28 LMI Households
- Infrastructure Improvement (Sidewalks) - Access for 2500 individuals
- Rehabilitation (vacant units to rent) - Rehabilitate 3 units for LMI households
- New Housing Construction (Rental and Sales) - Add 6 new housing units for LMI households
- Owner-Occupied Rehabilitation - Rehabilitate 2 housing units for LMI households
- Emergency Rehabilitation - Repair 42 housing units for LMI households
- Demolition - Demolish 5 dilapidated buildings
- Direct Services to the LMI Community - Provide services to almost 3,000 LMI persons
 - Provide services to around 6,700 LMI persons for COVID-19 related response
 - (November 2020) With additional CARES Act funding, assist 200 households with financial assistance
- Action on Homelessness - Shelter 125 homeless persons and provide rapid re-housing for 46 households
 - Shelter 300 homeless persons and provide rapid re-housing for 40 households for COVID-19 related response
 - With additional CARES Act funding, shelter 292 individuals, provide rapid re-housing for 38 households, and provide homelessness prevention for 113 individuals.

3. Evaluation of past performance

This is an evaluation of past performance that helped lead the grantee to choose its goals or projects.

The following represents outcomes reported in the County's second year of the 2016-2020 Consolidated Plan submitted and accepted by HUD in September 2018. For CDBG, Infrastructure projects (particularly well, septic, and water connections) were one of the top priorities for the County in Program Year (PY) 2017. A total of 71 upgrades or connections were made for LMI households to have clean drinking water and safe, sanitary septic systems through activities completed by the Charleston County Community Development Department. In addition to these infrastructure projects, 5 sidewalk projects were completed in North Charleston (with prior year funds).

Emergency Repairs were also one of the top priorities under CDBG for the County in PY2017, with 52 repairs performed during the year. Also using CDBG funds, public service activities reached the most vulnerable of the county residents through youth programs, literacy and workplace training, and legal and senior services. Over 22,000 Charleston County residents received public services during the program year.

4. Summary of Citizen Participation Process and consultation process

Summary from citizen participation section of plan.

A sequence of public hearings/meetings were held in 2018 to discuss the preparation of the 2019 - 2020 Annual Action Plan, to answer resident questions, and to seek public input. Comments and feedback from citizens were consistently encouraged throughout the entire planning process. In addition, two hearings about the annual action plan were held on March 12, 2019 and March 14, 2019. The public comment period was held for 30 days from March 13 - April 13, 2019. See Appendices A and B, which includes a summary of public hearing times/dates as well as public comments received.

See Appendix A for summary of Citizen Participation Process and Consultation process for CARES Act funding

5. Summary of public comments

This could be a brief narrative summary or reference an attached document from the Citizen Participation section of the Con Plan.

See Appendix A for summary of public comments.

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

N/A

7. Summary

Charleston County's community development programs seek to develop viable communities by providing affordable housing, a suitable living environment, and expanded economic opportunities. The Annual Action Plan enables Charleston County to examine the housing and community development needs of the county and to develop programs that effectively utilize the resources available to address these needs and improve the quality of life for low and moderate income residents.

PR-05 Lead & Responsible Agencies – 91.200(b)

1. Agency/entity responsible for preparing/administering the Consolidated Plan

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

Agency Role	Name	Department/Agency
Lead Agency	CHARLESTON COUNTY	
CDBG Administrator	CHARLESTON COUNTY	Community Development Department
HOPWA Administrator		
HOME Administrator	CHARLESTON COUNTY	Community Development Department
ESG Administrator	CHARLESTON COUNTY	Community Development Department
HOPWA-C Administrator		

Table 1 – Responsible Agencies

Narrative (optional)

Charleston County’s Community Development Department administers the Community Development Block Grant (CDBG), Home Investment Partnerships Program (HOME) and Emergency Solutions Grant (ESG) for Charleston County and is designated as the lead entity responsible for overseeing the development of the county’s Consolidated Plan. However, preparation and development of the plan required input from numerous individuals, municipalities, agencies and organizations throughout the county.

Consolidated Plan Public Contact Information

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AP-10 Consultation – 91.100, 91.200(b), 91.215(I)

1. Introduction

Charleston County is engaged in ongoing efforts to increase coordination amongst the complex network of public, private, and nonprofit organizations that deliver housing and social services to the community. As the administrators of HUD's CDBG, HOME and HESG programs, the County's Department of Community Development acts as a hub for community and economic development in the area. Open lines of communication are maintained between the County and the area's many non-profit and social service agencies.

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))

Charleston County staff is readily accessible and present at all County Council meetings to hear public comments on various public items on Council's agenda. Community Development staff is actively engaged in discussions and initiatives related to affordable housing; fair housing; Lowcountry Continuum of Care (CoC) meetings and discussions; and, Planning and Zoning coordination. County staff contacts Charleston County Housing and Redevelopment Authority to receive input on community development plans and activities.

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 CoC plans, develops and implements comprehensive and coordinated strategies to address homelessness in Beaufort, Berkeley, Charleston, Colleton, Dorchester, Hampton and Jasper Counties in South Carolina. A departmental staff person is also on the Board of Directors for the local CoC.

Responsibilities of the CoC include:

- Conduct planning activities for the CoC, including setting strategic priorities
- Operate a Coordinated Entry System (CES)
- Conduct the HUD-required Point in Time Count
- Establish and follow written standards for providing assistance with HUD funds.

In addition, outreach coordinators target both known locations where persons live unsheltered and service sites where homeless persons go to receive services. Most people access coordinated entry through the housing crisis line and the CoC website. They assess all households engaged through outreach and/or who seek housing assistance to determine their level of vulnerability and appropriateness for housing interventions. The CES is advertised and participated in by all service

providers in the service area and by the housing crisis line, a human services information call center. All federally funded housing services provided within the CoC are prioritized based upon vulnerability.

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

Charleston County is one of two HESG recipients in the CoC's geographic area. Lowcountry Continuum of Care, the area CoC, uses HMIS data to identify the most successful interventions. Lowcountry CoC assisted in establishing these two funding priorities for 2019:

1. Rapid Re-housing
2. Shelter Operations

The CoC collaborates with the other South Carolina CoCs and the South Carolina Office of Economic Opportunity (OEO) to establish state-wide HESG priorities; performance measures, HMIS data collection standards, and evaluation methods. The first priority is rapid re-housing, which has been proven to be the best practice to affect real change for this population.

The CoC provides HESG data for the County's CAPER. HMIS data is reviewed monthly by individual providers with the HMIS System Administrator providing training. CoC Committees evaluate the performance of renewal projects in the following areas, as captured in HMIS: data quality; client exits to permanent housing; length of time homeless; exits with earned income and income from all sources; occupancy rate; and recidivism rate. Project performance is evaluated in comparison to the CoC's performance objectives in each of these categories. New and renewal applicants are evaluated on general agency capacity: experience managing federal grants; review of monitoring visits; review of financial audits; timely payment of CoC Administrative Fees; PIT Count participation; CoC participation; adequate staffing and facilities; and use of best/evidence-based practices. Projects that serve clients with more barriers to housing are acknowledged and evaluated relative to their target-population.

Only CoC endorsed applications are considered for funding by the County HESG Program.

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

Table 2 – Agencies, groups, organizations who participated

1	Agency/Group/Organization	One80Place
	Agency/Group/Organization Type	Services-homeless
	What section of the Plan was addressed by Consultation?	Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Lowcountry Continuum of Care Participation; Response to Request For Application for ESG and CDBG; Presentation to Community Development Advisory Board.
2	Agency/Group/Organization	CHARLESTON AREA SENIOR CITIZENS
	Agency/Group/Organization Type	Services-Elderly Persons Services-Persons with Disabilities
	What section of the Plan was addressed by Consultation?	Non-Homeless Special Needs Anti-poverty Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Response to Request For Application for CDBG; Presentation to Community Development Advisory Board.
3	Agency/Group/Organization	Dee Norton Lowcountry Children's Center
	Agency/Group/Organization Type	Services-Children Services - Victims Child Welfare Agency
	What section of the Plan was addressed by Consultation?	Non-Homeless Special Needs

	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Response to Request For Application for CDBG; Presentation to Community Development Advisory Board.
4	Agency/Group/Organization	EAST COOPER MEALS ON WHEELS
	Agency/Group/Organization Type	Services-Elderly Persons Services-Persons with Disabilities
	What section of the Plan was addressed by Consultation?	Non-Homeless Special Needs Anti-poverty Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Response to Request For Application for CDBG; Presentation to Community Development Advisory Board.
5	Agency/Group/Organization	PRO BONO LEGAL SERVICES
	Agency/Group/Organization Type	Services-Elderly Persons Services-Persons with Disabilities Service-Fair Housing Services - Victims
	What section of the Plan was addressed by Consultation?	Non-Homeless Special Needs Fair Housing
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Technical Assistance; Response to Request For Application for CDBG; Presentation to Community Development Advisory Board.
6	Agency/Group/Organization	TOWN OF AWENDAW
	Agency/Group/Organization Type	Services - Housing Other government - Local

	What section of the Plan was addressed by Consultation?	Housing Need Assessment Emergency Repair Needs
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Public Meeting and Presentation at Town of Awendaw; Technical Assistance; Emergency Repair Provider Meeting on 10/30/18
7	Agency/Group/Organization	Operation Home
	Agency/Group/Organization Type	Services - Housing
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Emergency Repair Needs
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Response to Request For Application for CDBG; Presentation to Community Development Advisory Board; Technical Assistance; Emergency Repair Provider Meeting on 10/30/18
8	Agency/Group/Organization	EAST COOPER COMMUNITY OUTREACH
	Agency/Group/Organization Type	Services-Health
	What section of the Plan was addressed by Consultation?	Non-Homeless Special Needs
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Response to Request For Application for CDBG; Presentation to Community Development Advisory Board; Technical Assistance
9	Agency/Group/Organization	Metanoia
	Agency/Group/Organization Type	Housing Services - Housing
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Emergency Repair, Owner-Occupied Housing needs

	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Response to Request For Application for CDBG, HOME, CHDO; Technical Assistance and regular meetings with staff; Emergency Repair Provider Meeting on 10/30/18
10	Agency/Group/Organization	TOWN OF HOLLYWOOD
	Agency/Group/Organization Type	Housing Other government - Local
	What section of the Plan was addressed by Consultation?	Housing Need Assessment
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Public Meeting and Presentation at Town of Hollywood; Response to Request For Application for HOME; Presentation to Community Development Advisory Board; Technical Assistance
11	Agency/Group/Organization	CHARLESTON TRIDENT URBAN LEAGUE
	Agency/Group/Organization Type	Service-Fair Housing
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Non-Homeless Special Needs Anti-poverty Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Response to Request For Application for CDBG; Presentation to Community Development Advisory Board
12	Agency/Group/Organization	Charleston County Human Services Commission
	Agency/Group/Organization Type	Services - Housing
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Emergency Repairs
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Response to Request For Application for CDBG; Presentation to Community Development Advisory Board

14	Agency/Group/Organization	Home Works of America
	Agency/Group/Organization Type	Services - Housing
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Emergency Repair
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Response to Request For Application for CDBG; Presentation to Community Development Advisory Board
15	Agency/Group/Organization	MY SISTER'S HOUSE
	Agency/Group/Organization Type	Services - Housing Services-Victims of Domestic Violence
	What section of the Plan was addressed by Consultation?	Homeless Needs - Families with children Homelessness Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Response to Request For Application for ESG; Presentation to Community Development Advisory Board.
16	Agency/Group/Organization	James Island Outreach
	Agency/Group/Organization Type	Services - Food Bank
	What section of the Plan was addressed by Consultation?	Non-Homeless Special Needs Anti-poverty Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Technical Assistance; Response to Request For Application for CDBG; Presentation to Community Development Advisory Board
17	Agency/Group/Organization	HUMANITIES FOUNDATION
	Agency/Group/Organization Type	Services - Housing

What section of the Plan was addressed by Consultation?	Non-Homeless Special Needs Anti-poverty Strategy
Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Response to Request For Application for CDBG; Presentation to Community Development Advisory Board

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

Not applicable.

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

Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
Continuum of Care	Lowcountry Continuum of Care	Enhance and strengthen programs directly benefiting homeless and those at risk of homelessness.
Opening Doors: Federal Strat. Plan on Homelessness	United States Interagency Council on Homelessness	End homelessness
Blueprint to End Homelessness in South Carolina	South Carolina Council on Homelessness	Programs to prevent homelessness (rapid re-housing)
Charleston County Comprehensive Plan	Charleston County Planning Department	Affordable housing
Berk.-Chas.-Dor. Housing Needs Assessment	Charleston County Planning Department	Affordable housing
Comprehensive Development Plan	City of North Charleston	Affordable housing; end homelessness
Public Housing Authority Five-Year Plan	Charleston County Housing and Redevelopment Authority	Affordable housing

Table 3 – Other local / regional / federal planning efforts

Narrative (optional)

As shown in this section, Charleston County is engaged in ongoing efforts to increase coordination amongst the network of public, private, and nonprofit organizations to administrator HUD's CDBG, HOME and HESG programs.

AP-12 Participation – 91.105, 91.200(c)

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

Citizen participation is a critical part of the planning process. Citizens are encouraged to participate in all phases of the CDBG, HOME, and HESG programs and are provided full access to program information.

The County's Community Development Department conducts public hearings during the course of a year for the purpose of providing information on Community Programs to County residents and to receive comments from citizens regarding program activities. At a minimum, hearings are conducted to obtain citizen's views on community development needs, prior to developing funding policies and to receive citizen's comments on proposed activities, prior to final funding decisions being made. Hearings are conducted at locations other than the County Council meeting chambers, to make them more convenient to residents, and hence increase the likelihood of citizen participation for those low-to-moderate income residents where housing and community development funds may be spent. At least once per year, generally scheduled to coincide with each year's annual HUD allocation, a public hearing or meeting is held in the participating jurisdictions (at the request of the jurisdictions). A sequence of public meetings was held in 2018-2019 to discuss the preparation of the 2019 - 2020 Annual Action Plan, to answer resident questions, and to seek public input. Comments and feedback from citizens are consistently encouraged (public comments are located in Appendix A).

- **SUBSTANTIAL AMENDMENT:** For the substantial amendment, the amendment was made available to the public on the County's website. A notice about the amendment was put in a local newspaper and public comments were allowed for 5 days prior to submission to HUD. More details in Appendix A.

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	URL (if applicable)
1	Public Hearing	Minorities Persons with disabilities Non-targeted/broad community Residents of Public and Assisted Housing	Hearings/Meetings were held separately in the following jurisdictions: Town of Awendaw, Town of Hollywood, Town of James Island, Town of Ravenel, and Town of Mount Pleasant. A meeting was also held at the John's Island Library to try to reach southern portions of the County, unincorporated areas, and Edisto Island residents.	See Appendix A for comments.	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	URL (if applicable)
2	Newspaper Ad	Minorities Persons with disabilities Non-targeted/broad community Residents of Public and Assisted Housing	Charleston County citizens invited to public hearings on Tuesday, March 12, 2019 at the Charleston County Council Chambers in North Charleston and on Thursday, March 14, 2019 at City of North Charleston Council Chambers as well as comment on the Annual Action Plan (comment period March 13 - April 13, 2019).	See Appendix A for comments.	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	URL (If applicable)
3	Public Hearing	Minorities Persons with disabilities Non-targeted/broad community Residents of Public and Assisted Housing	Charleston County citizens invited to public hearings on Tuesday, March 12, 2019 at the Charleston County Council Chambers in North Charleston and on Thursday, March 14, 2019	See Appendix A for comments.	Not applicable.	
4	Internet Outreach	Minorities Persons with disabilities Non-targeted/broad community Residents of Public and Assisted Housing	The draft PY19 Annual Action Plan and related notices are posted on the Charleston County Community Development webpage. A notice about the availability of the Annual Action Plan was also posted on the County's Facebook page.	See Appendix A for comments.	Not applicable.	

Table 4 – Citizen Participation Outreach

Expected Resources

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

Introduction

CDBG, HOME, and ESG are the entitlement grant funds Charleston County receives directly from HUD.

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	1,768,692	0	210	1,768,902	1,290,509	CDBG funds will be allocated for the administration of the program, Fair Housing activities, programs and services benefiting the public, community revitalization and other eligible activities.

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	732,515	0	178,187	910,702	206,240	HOME funds will be used to support administration of the program, the development and revitalization of housing for low to moderate income individuals and families, and other activities related to creating suitable living environments.

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	149,581	0	0	149,581	128,894	ESG funds will be used to provide homeless management information system (HMIS) technical assistance, rapid re-housing, and shelter operations.
Other	public - federal	Financial Assistance Public Services Rapid re-housing (rental assistance) Rental Assistance Services	2,883,893	0	0	2,883,893	0	CDBG-CV funds from the CARES Act to be used to prevent, prepare for, and respond to the coronavirus pandemic (COVID-19).

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	public - federal	Housing Overnight shelter Rapid re-housing (rental assistance) Rental Assistance	1,426,115	0	0	1,426,115	0	HESG-CV funds from the CARES Act to be used to prevent, prepare for, and respond to the coronavirus pandemic (COVID-19).

Table 5 - Expected Resources – Priority Table

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

Match/leveraged funds are satisfied in each project by the Subrecipient documenting their matching funds in the monthly/quarterly reporting system, or when they ask for reimbursement for the activity that they were funded. In addition, County staff monitors each Subrecipient on an annual basis at a minimum. Staff reviews each file’s documentation and also requests a copy of their audit to make sure there were no findings. Staff provides technical assistance where needed to all Subrecipients.

All HOME projects are expected to provide a leveraging match of at least 25% of the total HOME funds awarded. The match funds must be from non-federal sources (unless the federal source allows the match) and be permanently committed to a HOME-assisted or eligible project. Eligible match includes: cash, donated land, donated labor, percentage of bond financing, direct costs of supportive services and homebuyer counseling. Subrecipients are expected to provide proof of match either with their application, or prior to the release of HOME funds for the project. The County reserves the right to use accumulated match in extenuating circumstances.

All ESG projects must follow the matching requirements outlined in 24 CFR 576.201. Although the regulations detail the requirements, some of

the rules are as follows: The recipient must make matching contributions to supplement the recipient's ESG program in an amount that equals the amount of ESG funds provided by HUD. Contributions used to match a previous ESG grant may not be used to match a subsequent ESG grant. The matching requirement may be met by one or both of the following: cash or noncash contributions (noncash contributions must be calculated according to the rules outlined in 24 CFR 576.201).

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

The County's Public Services Building acts as a hub for administering the CDBG, HOME, and HESG programs as well as a meeting place for hearings and meetings to discuss plan goals.

Discussion

CDBG funds will be allocated for the administration of the program, Fair Housing activities, programs and services benefiting the public, community revitalization and other eligible activities. HOME funds will be used to support administration of the program, the development and revitalization of housing for low to moderate income individuals and families, and other activities related to creating suitable living environments. ESG funds will be used to provide homeless management information system (HMIS) technical assistance, rapid re-housing, and shelter operations.

Sea Island Habitat was awarded \$70,000 in PY18 but decided to return the funds to Charleston County. Those funds are included in the Prior Year Resources for HOME.

Substantial Amendment (May 2020):

- Add funds for the Community Development Block Grant (CDBG)-CV in the amount of \$1,090,016 and the Emergency Solutions Grant (ESG)-CV in the amount of \$535,900.

Substantial Amendment (July 2020)

- Add funds for the Emergency Solutions Grant (ESG)-CV in the amount of \$890,215

Substantial Amendment (November 2020)

- Add funds for the Community Development Block Grant (CDBG)-CV in the amount of \$1,793,877

Annual Goals and Objectives

AP-20 Annual Goals and Objectives

Goals Summary Information

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	Well and Septic Improvements	2016	2020	Affordable Housing Non-Housing Community Development	Countywide County (Rural only)	Infrastructure Improvements and Development	CDBG: \$283,826	Homeowner Housing Rehabilitated: 28 Household Housing Unit
2	Infrastructure Improvement (Sidewalks)	2016	2020	Non-Housing Community Development	Countywide	Infrastructure Improvements and Development	CDBG: \$336,821	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 2500 Persons Assisted
4	Rehabilitation (vacant units to sell or rent)	2016	2020	Affordable Housing	Countywide	Affordable Housing and Suitable Living Options	HOME: \$185,314	Rental units rehabilitated: 3 Household Housing Unit
5	New Housing Construction (Rental and Sales)	2016	2020	Affordable Housing	Countywide	Affordable Housing and Suitable Living Options	HOME: \$518,570	Rental units constructed: 2 Household Housing Unit Homeowner Housing Added: 4 Household Housing Unit

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
6	Owner-Occupied Rehabilitation	2016	2020	Affordable Housing	Countywide	Affordable Housing and Suitable Living Options	HOME: \$127,448	Homeowner Housing Rehabilitated: 2 Household Housing Unit
7	Emergency Rehabilitation	2016	2020	Affordable Housing	Countywide	Affordable Housing and Suitable Living Options Social Services to Benefit the LMI Community	CDBG: \$445,608	Homeowner Housing Rehabilitated: 42 Household Housing Unit
8	Direct Services to the LMI Community	2016	2020	Non-Homeless Special Needs	Countywide	Social Services to Benefit the LMI Community	CDBG: \$228,983 CDBG-CV: \$2,883,893	Public service activities other than Low/Moderate Income Housing Benefit: 9456 Persons Assisted Public service activities for Low/Moderate Income Housing Benefit: 502 Households Assisted Homeless Person Overnight Shelter: 27 Persons Assisted
9	Action on Homelessness	2016	2020	Homeless	Countywide	Homeless Needs	ESG: \$149,581 HESG-CV: \$1,426,115	Tenant-based rental assistance / Rapid Rehousing: 124 Households Assisted Homeless Person Overnight Shelter: 718 Persons Assisted Homelessness Prevention: 113 Persons Assisted

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
10	Demolition	2016	2020	Affordable Housing Homeless	Countywide	Affordable Housing and Suitable Living Options	CDBG: \$83,606	Buildings Demolished: 5 Buildings
11	Program Administration	2016	2020	Affordable Housing Public Housing Homeless Non-Homeless Special Needs Non-Housing Community Development	Countywide	Affordable Housing and Suitable Living Options Homeless Needs Infrastructure Improvements and Development Social Services to Benefit the LMI Community	CDBG: \$353,738 HOME: \$73,252	Other: 0 Other

Table 6 – Goals Summary

Goal Descriptions

1	Goal Name	Well and Septic Improvements
	Goal Description	Upgrading failing wells and septic systems or connecting LMI households to existing infrastructure
2	Goal Name	Infrastructure Improvement (Sidewalks)
	Goal Description	Provide sidewalk construction and repair to create livable and walkable communities.

4	Goal Name	Rehabilitation (vacant units to sell or rent)
	Goal Description	A priority for the County and its partners is to promote the availability of decent housing by rehabilitating housing units to rent to LMI households.
5	Goal Name	New Housing Construction (Rental and Sales)
	Goal Description	The County will continue to support the construction of affordable housing (sales and rental) throughout the jurisdiction.
6	Goal Name	Owner-Occupied Rehabilitation
	Goal Description	A priority for the County and its partners is to rehabilitate housing owned and occupied by LMI households.
7	Goal Name	Emergency Rehabilitation
	Goal Description	Emergency housing repairs occupied by LMI households.
8	Goal Name	Direct Services to the LMI Community
	Goal Description	Provide public services such as training/education, health services, elderly services, neglected and abused children services, legal services, and subsistence payments.
9	Goal Name	Action on Homelessness
	Goal Description	The County and its partners will assist households with rapid re-housing to prevent homelessness and to provide overnight shelter for homeless individuals. This goal also includes HMIS administration.
10	Goal Name	Demolition
	Goal Description	Demolish and remove dilapidated housing to allow new housing for LMI individuals and households to be built.
11	Goal Name	Program Administration
	Goal Description	Funds will be used to administer Charleston County's CDBG and HOME programs.

Projects

AP-35 Projects – 91.220(d)

Introduction

Charleston County administers a comprehensive housing and community development program. This program includes awarding grants to local housing and service providers, the provision of housing rehabilitation services, grant oversight monitoring and regular reporting to the U.S. Department of Housing and Urban Development (HUD). The following projects describe the activities Charleston County will fund from Community Development Block Grant (CDBG), HOME Investment Partnerships Program, and Emergency Shelter Grants Program (ESG) funds in the coming program year.

Projects

#	Project Name
1	Well Septic and Infrastructure Connection Program
2	New Housing in Charleston County
3	Rehabilitation of vacant units in Charleston County
4	Emergency Repair Program
5	Owner Occupied Rehabilitation
6	Public Services for Charleston County Residents
7	Rapid Re Housing and Shelter Operations
8	Sidewalk Improvements
9	Demolition of Dilapidated Structures
10	Charleston County Program Administration
11	Contingency Funding
12	CV-Public Services for Charleston County Residents
13	ESG20 Charleston County

Table 7 - Project Information

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

The funded projects address the housing and related services needs identified within the Needs Analysis and Housing Market Assessment sections of this Consolidated Plan. Charleston County awards grant funds to support housing and community development activities throughout the entire county, with the exception of the City of Charleston.

The greatest obstacle to addressing underserved needs is funding - there are always more needs than available funding. In spite of the obstacles to meeting underserved needs, goals are achieved through a concentrated effort implemented by a collaborative partnership of local government, nonprofit organizations and more recently, private organizations. Additionally, Subrecipients funded by Charleston

County pursue funding from other local jurisdictions, foundations, and banks to ensure their projects come to fruition.

AP-38 Project Summary
Project Summary Information

1	Project Name	Well Septic and Infrastructure Connection Program
	Target Area	Countywide County (Rural only)
	Goals Supported	Well and Septic Improvements
	Needs Addressed	Infrastructure Improvements and Development
	Funding	CDBG: \$283,826
	Description	Provide clean water and sanitary wastewater by either upgrading failing wells and septic systems or connecting LMI households to existing infrastructure.
	Target Date	8/31/2020
	Estimate the number and type of families that will benefit from the proposed activities	28 LMI households
	Location Description	Addresses to be determined
	Planned Activities	Charleston County Well, Septic, and Infrastructure Upgrades: \$283,826
2	Project Name	New Housing in Charleston County
	Target Area	Countywide
	Goals Supported	New Housing Construction (Rental and Sales)
	Needs Addressed	Affordable Housing and Suitable Living Options
	Funding	HOME: \$518,570
	Description	The County will continue to support the construction of affordable housing (sales and rental) throughout the jurisdiction.
	Target Date	8/31/2020
	Estimate the number and type of families that will benefit from the proposed activities	6 LMI households
	Location Description	North Charleston, Town of Hollywood
	Planned Activities	Community First Land Trust: \$161,371 Metanoia: \$136,175 Town of Hollywood: \$221,024
3	Project Name	Rehabilitation of vacant units in Charleston County
	Target Area	Countywide
	Goals Supported	Rehabilitation (vacant units to sell or rent)

	Needs Addressed	Affordable Housing and Suitable Living Options
	Funding	HOME: \$185,314
	Description	Purchase, rehabilitate and lease properties in Charleston County to low-income families
	Target Date	8/31/2020
	Estimate the number and type of families that will benefit from the proposed activities	3 LMI households
	Location Description	To be determined
	Planned Activities	HERIndependence: \$77,488 Tricounty Weatherization Group, LLC DBA Home Opportunity Fund, LLC: \$107,826
4	Project Name	Emergency Repair Program
	Target Area	Countywide
	Goals Supported	Emergency Rehabilitation
	Needs Addressed	Affordable Housing and Suitable Living Options
	Funding	CDBG: \$445,608
	Description	Repairs of housing occupied by LMI households
	Target Date	8/31/2020
	Estimate the number and type of families that will benefit from the proposed activities	42 LMI households
	Location Description	To be determined
	Planned Activities	Home Dreams Foundation: \$100,990 Home Works of America: \$113,121 Metanoia: \$66,885 Operation Home: \$152,638 Palmetto Community Action Partnership: \$11,974
5	Project Name	Owner Occupied Rehabilitation
	Target Area	Countywide
	Goals Supported	Owner-Occupied Rehabilitation
	Needs Addressed	Affordable Housing and Suitable Living Options

	Funding	HOME: \$127,448
	Description	A priority for the County and its partners is to rehabilitate housing owned and occupied by LMI households.
	Target Date	8/31/2020
	Estimate the number and type of families that will benefit from the proposed activities	2 LMI households
	Location Description	North Charleston
	Planned Activities	Owner-occupied rehabilitation program - Metanoia: \$127,448
6	Project Name	Public Services for Charleston County Residents
	Target Area	Countywide
	Goals Supported	Direct Services to the LMI Community
	Needs Addressed	Social Services to Benefit the LMI Community
	Funding	CDBG: \$262,709
	Description	This program will include support for public services related to neglected and abused children, employment training, education, health services, the elderly, legal assistance, and subsistence payments to meet the needs in the County.
	Target Date	8/31/2020
	Estimate the number and type of families that will benefit from the proposed activities	2991 individuals 82 households 27 persons (homeless person overnight shelter)
	Location Description	County-wide

	Planned Activities	<p>Carolina Youth Development Center(Charleston Orphan House, Inc): \$17,484 Charleston Area Senior Citizens Services Inc: \$35,785* Charleston Trident Urban League: \$11,148 East Cooper Community Outreach: \$16,336 East Cooper Meals on Wheels: \$23,336 Lowcountry Homeless Coalition: \$6,336 One80 Place: \$8,361 Pro Bono Legal Services, Inc.: \$29,825 The Dee Norton Lowcountry Children's Center, Inc. (DBA Dee Norton Child Advocacy Center): \$19,697 The Humanities Foundation: \$22,771 Trident Literacy Association: \$16,722 WINGS for Kids: \$7,804 NC Recreation: \$13,378</p> <p>*Charleston Area Senior Citizens Services Inc: \$33,726 (Awarded in 2020 but will be coming out of PY19 funds)</p>
7	Project Name	Rapid Re Housing and Shelter Operations
	Target Area	Countywide
	Goals Supported	Action on Homelessness
	Needs Addressed	Homeless Needs
	Funding	ESG: \$149,581
	Description	The County and its partners will assist households with rapid re-housing to prevent homelessness and provide homeless individuals with overnight shelter. This project also includes HMIS.
	Target Date	8/31/2020
	Estimate the number and type of families that will benefit from the proposed activities	125 homeless individuals to receive shelter; 46 households to be rapidly re-housed.
	Location Description	Charleston County
	Planned Activities	<p>Family Services, Inc. DBA Origin SC: \$35,813 Florence Crittenton Programs of SC: \$25,813 My Sister's House: \$27,141 One80 Place: \$45,814 HMIS: \$15,000</p>
	Project Name	Sidewalk Improvements

8	Target Area	Countywide
	Goals Supported	Infrastructure Improvement (Sidewalks)
	Needs Addressed	Infrastructure Improvements and Development
	Funding	CDBG: \$336,821
	Description	Provide sidewalk construction and repair to create livable and walkable communities.
	Target Date	8/31/2020
	Estimate the number and type of families that will benefit from the proposed activities	Approximately 2,500 individuals will have access to new sidewalks in LMI areas
	Location Description	North Charleston - exact locations to be determined
	Planned Activities	Sidewalk Installations: \$336,821
9	Project Name	Demolition of Dilapidated Structures
	Target Area	Countywide
	Goals Supported	Demolition
	Needs Addressed	Infrastructure Improvements and Development
	Funding	CDBG: \$83,606
	Description	Demolition of dilapidated structures in LMI neighborhoods.
	Target Date	8/31/2020
	Estimate the number and type of families that will benefit from the proposed activities	5 buildings will be demolished
	Location Description	North Charleston
Planned Activities	Demolition of dilapidated structures (North Charleston): \$83,606	
10	Project Name	Charleston County Program Administration
	Target Area	Countywide
	Goals Supported	Program Administration
	Needs Addressed	Affordable Housing and Suitable Living Options Infrastructure Improvements and Development Social Services to Benefit the LMI Community Homeless Needs

	Funding	CDBG: \$353,738 HOME: \$73,252
	Description	Funds will be used to administer Charleston County's CDBG and HOME programs.
	Target Date	8/31/2020
	Estimate the number and type of families that will benefit from the proposed activities	N/A
	Location Description	Charleston County
	Planned Activities	Funds will be used to administer Charleston County's CDBG and HOME programs.
11	Project Name	Contingency Funding
	Target Area	Countywide
	Goals Supported	Well and Septic Improvements Infrastructure Improvement (Sidewalks) Rehabilitation (vacant units to sell or rent) New Housing Construction (Rental and Sales) Owner-Occupied Rehabilitation Emergency Rehabilitation Direct Services to the LMI Community Action on Homelessness Demolition
	Needs Addressed	Affordable Housing and Suitable Living Options Infrastructure Improvements and Development Social Services to Benefit the LMI Community
	Funding	CDBG: \$2,594 HOME: \$6,118
	Description	Contingency funding to be determined
	Target Date	
	Estimate the number and type of families that will benefit from the proposed activities	N/A
	Location Description	N/A
	Planned Activities	Contingency funding to be determined

12	Project Name	CV-Public Services for Charleston County Residents
	Target Area	Countywide
	Goals Supported	Direct Services to the LMI Community
	Needs Addressed	Social Services to Benefit the LMI Community
	Funding	CDBG-CV: \$2,883,893
	Description	Public service activities to help prevent, prepare for, and respond to the coronavirus pandemic (COVID19)
	Target Date	8/31/2021
	Estimate the number and type of families that will benefit from the proposed activities	Round 1: 6495 LMI individuals 170 LMI families Round 3: November 2020: additional 250 families with financial assistance
	Location Description	Charleston County

	Planned Activities	<p>Round 1:</p> <p>Housing Assistance Payments Humanities Foundation (ShelterNet): \$50,000 East Cooper Community Outreach Financial Assistance: \$118,145 Origin SC- Financial Assistance: \$287,728 James Island Outreach: \$30,000 Charleston Trident Urban League: \$110,000</p> <p>Access to Essential Medical Services and Medication East Cooper Community Outreach Rx Assistance: \$48,000</p> <p>Access to Healthy Food East Cooper Meals on Wheels: \$10,000 Lowcountry Food Bank: \$240,000 Charleston Area Senior Citizens Services Inc.: \$54,143</p> <p>Essential services for homeless including legal services Charleston Pro Bono Legal Services, Inc.: \$100,000</p> <p>Hotel/Motel Vouchers Origin SC- Hotel/Motel Vouchers: \$42,000</p> <p>Round 3:</p> <p>Housing Assistance Payments Charleston County Community Development: \$1,793,877</p>
13	Project Name	ESG20 Charleston County
	Target Area	Countywide
	Goals Supported	Action on Homelessness
	Needs Addressed	Homeless Needs
	Funding	HESG-CV: \$1,426,115
	Description	<p>The County and its partners will assist households with rapid re-housing to prevent homelessness and provide homeless individuals with overnight shelter. This project also includes HMIS and HESG administration. PY2020 funds total \$155,411. ESG-CV funds will be used to prevent, prepare for, and respond to the coronavirus pandemic (COVID19) in the amount of \$535,900 (in Round 1) and \$890,215 (in Round 2).</p>

Target Date	8/31/2021
Estimate the number and type of families that will benefit from the proposed activities	<p>Round 1 of ESG-CV funds: 300 households receive shelter 40 households rapidly rehoused</p> <p>Round 2 of ESG-CV funds: 292 households receive shelter 38 households rapidly rehoused</p> <p>113 persons assisted with homelessness prevention</p>
Location Description	Charleston County
Planned Activities	<p><u>Round 1 of ESG-CV funds:</u></p> <p>Rapid Re-Housing One80 Place: \$279,980</p> <p>Shelter One80 Place: \$255,920</p> <p><u>Round 2 of ESG-CV funds:</u></p> <p>Homelessness prevention Family Services, Inc. DBA Origin SC: \$ 20,000 Charleston Trident Urban League: \$207,838 Florence Crittenton Programs of SC: \$113,162</p> <p>Rapid Re-Housing One80 Place: \$220,503 Florence Crittenton Programs of SC: \$64,162</p> <p>Shelter Operations One80 Place: \$129,550 Charleston Orphan House dba Carolina Youth Development Center: \$135,000</p>

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

Charleston County awards grant funds to support housing and community development activities throughout the County (with the exception of City of Charleston, which has its own HUD funding). These funds support projects under the CDBG, HOME, and HESG programs. Grant funds are made available for use across the county.

The lowest incomes tend to be concentrated in parts of the City North Charleston and also in the county's rural areas. According to the 2010 Census, White residents make up 64.2 percent, African Americans make up 29.8 percent, Asian Americans make up 1.3 percent, and Latino residents make up 5.4 percent (other racial/ethnic groups were less than 2 percent). While African Americans are widely dispersed throughout the county, they are concentrated (40 percent or higher) in sections of almost every municipality and rural area. However, the largest concentration of African Americans (74 percent or higher) is in parts of West Ashley, Mount Pleasant, and in the northern part of the City of Charleston's peninsula leading up and adjacent to the City of North Charleston (an area generally referred to as "the Neck"). The highest concentration of low-income families was also located in "the Neck" area. Although grant funds are made available for use across the county, some subrecipients concentrate their work in the City of North Charleston as well as the rural parts of the county.

Geographic Distribution

Target Area	Percentage of Funds
Countywide	95
County (Rural only)	5

Table 8 - Geographic Distribution

Rationale for the priorities for allocating investments geographically

There are needs throughout the county (including rural areas), so funds are distributed wherever they can be best utilized by partnering organizations. Charleston County Well, Septic and Infrastructure Upgrades typically occur in rural areas of the County, which is represented by 5 percent of the total funds (this is an estimate only).

Discussion

Charleston County's partnering organizations serve the needs of LMI residents in all of the county's communities, so no area is prioritized over another.

Affordable Housing

AP-55 Affordable Housing – 91.220(g)

Introduction

Charleston County is committed to supporting the development of affordable housing for low and moderate income families in the communities throughout the county.

One Year Goals for the Number of Households to be Supported	
Homeless	124
Non-Homeless	51
Special-Needs	0
Total	175

Table 9 - One Year Goals for Affordable Housing by Support Requirement

One Year Goals for the Number of Households Supported Through	
Rental Assistance	124
The Production of New Units	6
Rehab of Existing Units	45
Acquisition of Existing Units	0
Total	175

Table 10 - One Year Goals for Affordable Housing by Support Type

Discussion

While the one year goals show support for 51 non-homeless households, some of these recipients could be homeless and/or special-needs. Specifically, homeless and special-needs households could potentially receive one of the six new units or one of the three acquired/rehabilitated existing units. However, the determinations of who will receive these units will be made at a future date.

Note: included in the tables is rental assistance under ESG as well as CDBG-funded emergency repairs on owner-occupied homes.

AP-60 Public Housing – 91.220(h)

Introduction

There are two Public Housing Authorities that operate within the County's jurisdiction (outside the City of Charleston city limits): the Charleston County Housing and Redevelopment Authority (CCHRA) and the North Charleston Housing Authority (NCHA).

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

There are 1,079 vouchers allocated for use in Charleston County. CCHRA also oversees the management and operations of 399 one, three, and four bedroom housing units (143 single-family homes and 256 elderly residences). The single family homes are located in 50 different subdivisions throughout Charleston County. Public Housing serves an average of 508 families annually.

In addition, NCHA has over 2056 voucher holders, a portfolio of 352 RAD units, and is involved in four tax credit apartment communities.

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

CCHRA administers the Family Self-Sufficiency (FSS) program, a Section 8 program of the United States Department of Housing and Urban Development (HUD) encourages communities to develop local strategies to help assisted families obtain employment that will lead to economic independence and self-sufficiency. Residents in the Section 8 Program may sign up to participate in FSS. The program works with residents, who establish goals such as, continuing their education, job training, purchasing a first-time home, or starting a small business. Residents who participate in the program must agree to work toward achieving their goals and participate in specific training. Participants build escrow accounts from their rent payments to help them reach their final goal at the completion of the program. The Resident Services Department works with various agencies in the community to develop resources for participating FSS family members.

NCHA also has the FSS Grant.

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

N/A

Discussion

The need for housing is greater than the availability.

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

Introduction

Homelessness is a particularly troublesome and complex issue that plagues communities across the nation. A major reason that homelessness is so difficult to combat is that it has many causes with overlapping and interrelated variables. The cause of any one person's homelessness often lies, not in a single factor, but at the convergence of multiple events and conditions. From one angle, homelessness can be seen as an economic problem - caused by unemployment, foreclosure, or poverty. From another viewpoint, homelessness could appear to be a health issue - as many homeless persons struggle with one or more conditions such as mental illness, physical disability, HIV, or substance abuse. Looking at the problem another way, homelessness emerges as a social problem - with factors such as domestic violence, educational attainment, or race lying at the root. In reality, homelessness is caused by all of these issues, sometimes simultaneously. As such, fighting homelessness requires a truly collaborative, community-based approach.

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

Lowcountry Continuum of Care (CoC) uses a Coordinated Entry System (CES) that covers a seven county service area (including Charleston County) and therefore employs unique aspects to address the differing needs that exist in these urban and rural settings. Outreach coordinators target both known locations where persons live unsheltered and service sites where homeless persons go to receive services. Most people access coordinated entry through the housing crisis line and the CoC website. They assess all households engaged through outreach and/or who seek housing assistance to determine their level of vulnerability and appropriateness for housing interventions. The CES is advertised and participated in by all service providers in the service area and by the housing crisis line, a human services information call center. All federally funded housing services provided within the CoC are prioritized based upon vulnerability. Outreach workers and service providers use HMIS to build and update our Prioritization List and a By-Name List on an ongoing basis.

Addressing the emergency shelter and transitional housing needs of homeless persons

One80 Place offers emergency shelter for individual men and women and/or families with children. Permanent Housing is the one of the main needs for many of the individuals living in emergency shelter or transitional housing in Charleston County. Research has shown that providing adequate, stable housing and supportive services is less expensive than allowing persons to live unsheltered because the costs of housing are less than local hospitals and jails or detention centers. Formerly homeless persons in stable housing enter the ER and jail systems at far lower rates than persons living unsheltered. Currently Charleston's HUD-funded permanent supportive housing developments are at full capacity and the County and its collaborative partners need to pursue alternative means to secure supportive housing for these unsheltered populations if the community is to

achieve an end to homelessness in Charleston.

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

One80 Place, Origin SC, and Florence Crittenton provide rapid re-housing financial services to help individuals and families get back into housing quickly. Origin SC and One80 Place offer Permanent Supportive Housing for chronically homeless individuals. Origin SC and Charleston Trident Urban League both offer homeless prevention services to help families stay in their current housing.

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.

Origin SC and Charleston Trident Urban League both offer homeless prevention services to help families stay in their current housing. These can certainly help those persons who are exiting institutions of care. The Humanities Foundation also administers a program called ShelterNet, which assists persons who are at-risk of becoming homeless by providing financial assistance to prevent them from losing their homes or apartments. Humanities Foundation also provides permanent housing for formerly homeless persons in several of its developments.

Discussion

Charleston County is one of two HESG recipients in the CoCs geographic area, with plans to award \$149,581 in 2019 and an additional \$1,426,115 in 2020 due to the CARES Act. The area CoC, uses HMIS data to identify the most successful interventions. The CoC assisted in establishing these two funding priorities for 2016-2020:

1. Rapid Re-housing
2. Shelter Operations

Lowcountry CoC collaborates with the other South Carolina CoCs and the South Carolina Office of Economic Opportunity (OEO) to establish state-wide HESG priorities; performance measures, HMIS data collection standards, and evaluation methods. The first priority is rapid re-housing, which has been proven to be the best

practice to affect real change for this population.

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

Introduction:

The provision of safe, decent affordable housing is one of the greatest challenges facing Charleston County, its development partners, and many jurisdictions across the State and Nation.

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

Currently, the County has a special Housing Task Force to make recommendations that would ameliorate negative effects of public policies that serve as barriers to affordable housing. The recommendations are still being developed.

The Analysis of Impediments to Fair Housing Choice for the Charleston region discusses several actions to remove barriers to affordable housing. Below are the impediments the County plans to address over the next year:

Impediment 1: Lack of Fair Housing Awareness

- Expand promotional efforts and provide information related to fair housing laws
- Distribution of fair housing materials

Impediment 6: Poverty Rates – Extremely Low Income

- Increased public investment dollars into distressed minority concentration areas (affordable housing units, public services, etc.)

Discussion:

Two factors contribute to the Charleston County's affordable housing problem: 1) A household's ability to afford housing based on its income, and 2) the price of housing. In response, the County will work with the City of Charleston and City of North Charleston in implementing the strategies mentioned previously. In addition, the County (through its partners) will employ activities intended to foster the development of affordable housing for low-to-moderate income families and individuals such as rehabilitating vacant units to sell or rent, constructing new housing to sell or rent, and rehabilitating owner-occupied housing.

AP-85 Other Actions – 91.220(k)

Introduction:

Through its Community Development programs, the County seeks to meet underserved needs, create and maintain affordable housing, reduce lead-based paint hazards, reduce the number of families in poverty, develop institutional structure, and enhance coordination between public and private housing and social service agencies. Actions related to address these obstacles are discussed throughout this section.

Actions planned to address obstacles to meeting underserved needs

The County seeks to meet underserved needs through its housing and community development programs. A particular need in the Charleston County is financial assistance to persons who are homeless or who are at-risk of becoming homeless. The County addresses this need by providing funds to nonprofit organizations serving homeless individuals and households. In addition, infrastructure improvements - to include well/septic upgrades and infrastructure connections, mostly in underserved communities, will help to foster safe and decent living environments for the residents of Charleston County.

Actions planned to foster and maintain affordable housing

The County (through its partners) will employ activities intended to foster and maintain affordable housing for low-to-moderate income families and individuals such as rehabilitating vacant units to sell or rent, constructing new housing to sell or rent, and rehabilitating owner-occupied housing.

Actions planned to reduce lead-based paint hazards

Charleston County requires documented evidence of adherence to the Lead Safe Housing Rule (LSHR) requirements and evaluates project management to ensure awardee compliance with County policies in the area of LBP Hazards oversight.

Actions planned to reduce the number of poverty-level families

Some of the actions Charleston County will take this program year are as follows:

- (1) Through the use of collaborative partnerships, provide additional and improved housing by engaging in the rehabilitation and creation of housing;
- (2) Provide essential legal services supporting home and family stability through a non-profit partner funded for that purpose;
- (3) Through the County's partnering institutions, provide persons who are at risk of becoming homeless with

rapid re-housing, rental, mortgage and/ or utility assistance;

(4) A non-profit partner funded by the County will provide comprehensive health services to uninsured and under-insured low-income adults at no cost; and,

(5) Fund partners that assist homeless individuals and households with overnight shelter.

Actions planned to develop institutional structure

Charleston County's Community Development Department continues to improve its processes and programs by participating in HUD-sponsored training and other training activities that will increase our capacity to deliver superior service to low and moderate income citizens in Charleston County. The Department is also building its capacity by continuing to partner with nonprofit housing and public service providers as well as engaging professional services (e.g., well drilling) when necessary to ensure that the needs of the community are being addressed. The Department is fortunate to have a Community Development Advisory Board to assist it in making funding decisions and meeting the needs of the community.

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

Charleston County has targeted significant CDBG and HOME resources for its housing partners to build affordable housing and rehabilitate existing units and owner-occupied homes. The County will continue to work with its partners to encourage affordable housing.

Discussion:

Overall, Charleston County is engaged in ongoing efforts to increase coordination amongst the complex network of public, private, and nonprofit organizations that deliver housing and social services to the community. As the administrators of HUD's CDBG, HOME and HESG programs, the County's Department of Community Development acts as a hub for community and economic development in the area. Open lines of communication are maintained between the County and the area's many non-profit and social service agencies.

Program Specific Requirements

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

Introduction:

The following items provide responses for additional regulatory requirements for the CDBG, HOME, and HESG 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.

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

Other CDBG Requirements

- | | |
|---|--------|
| 1. The amount of urgent need activities | 0 |
| 2. The estimated percentage of CDBG funds that will be used for activities that benefit persons of low and moderate income. Overall Benefit - A consecutive period of one, two or three years may be used to determine that a minimum overall benefit of 70% of CDBG funds is used to benefit persons of low and moderate income. Specify the years covered that include this Annual Action Plan. | 80.00% |

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:

N/A

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:

The County uses recapture as its method of protecting affordability. All properties receiving financial assistance from the County for homeownership and homebuyer activities must ensure that the housing remains affordable to families with incomes of 80 percent or less of the area median for at least the minimum affordability period based on the initial amount of assistance provided. The affordability requirements will be enforced with restrictive covenants or liens that will be recorded with the County's Register of Deeds. More details about the guidelines can be found in the County's HOME Program Operating and Procedures Manual.

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:

For all homebuyer or homeowner activities to include owner-occupied rehabilitation, homebuyer down payment and closing cost assistance and housing development subsidies that cause the unit to be sold below fair market value projects, a recapture provision shall be utilized. These subsidies represent a direct subsidy to the homebuyer. If the home is sold during the period of affordability, the County must be notified of the sale. The County will execute written agreements that reflect the recapture provisions at or before the time of sale and will be enforced via a recorded lien. All County initiated activities for homebuyer, homeownership, and owner-occupied activities will have an affordability period as required by 24 CFR Part 92.254. CHDO's and or subrecipients will be required to enforce these recapture provisions. These provisions will be included in the lien/loan documents. More details about the guidelines can be found in the County's HOME Program Operating and Procedures Manual.

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:

No funding will be utilized to refinance existing debt.

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

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

See attached "Monitoring Plan," which is applicable to all Urban Entitlement projects. In addition, the following standards must be met:

- Must be private nonprofit organizations.
 - Agencies must submit 501(c)3 status documentation.
 - Agency's project request for HESG funds must be endorsed by the local Continuum of Care to make sure the agency's project is in line with the CoC's priorities and standards. Agencies must provide a service that HUD prioritizes (Rapid Re-Housing, Street/Community outreach, Shelter Operations).
 - Any agency receiving HESG funds is obligated to maintain both client services activity records and performance outcome measures utilizing HMIS. Domestic violence, AIDS and legal service providers must use a comparable database that collects client-level data over time and generates unduplicated aggregate reports.
2. If the Continuum of Care has established centralized or coordinated assessment system that meets HUD requirements, describe that centralized or coordinated assessment system.

Lowcountry Continuum of Care (CoC) uses a Coordinated Entry System (CES) that covers a seven county service area (including Charleston County) and therefore employs unique aspects to address the differing needs that exist in these urban and rural settings. Outreach coordinators target both known locations where persons live unsheltered and service sites where homeless persons go to receive services. Most people access coordinated entry through the housing crisis line and the CoC website. They assess all households engaged through outreach and/or who seek housing assistance to determine their level of vulnerability and appropriateness for housing interventions. The CES is advertised and participated in by all service providers in the service area and by the housing crisis line, a human services information call center. This emergency hotline takes the burden of navigation off of the individual or family and ensures that everyone in the community has equal access to the services available. All federally funded housing services provided within the CoC are prioritized based upon vulnerability. Outreach workers and service providers use HMIS (or comparable database for domestic violence, AIDS and legal service providers) to build and update our Prioritization List and a By-Name List on an ongoing basis.

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 County issues a Request for Applications (RFA) requesting that interested agencies apply for ESG eligible

activities. After applications are received, an ad hoc grant review subcommittee reviews/scores the applications and provides the scores to the Community Development Advisory Board (CDAB). The CDAB makes funding recommendations, which are then reviewed and approved during a Charleston County Council public hearing. The public hearing notice is published in The Post & Courier. For HESG funding, the Lowcountry Continuum of Care first reviews project requests and endorses selected projects for the Board's consideration.

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.

A homeless and/or formerly homeless individual participates in the the CoC governing body. Charleston County consults the CoC when prioritizing policy and funding decisions related to the ESG program.

5. Describe performance standards for evaluating ESG.

See attached "Monitoring Plan," which is applicable to all Urban Entitlement projects.

Appendix A: Citizen Participation Comments

Public Comments – Annual Action Plan

- **Ravenel:** 5962 Highway 165 Ste 100, Ravenel, Tuesday, October 30, 2018 at 5:45 PM
 - None
- **James Island:** 1122 Dills Bluff Road, James Island, Thursday, November 15, 2018 at 7 PM
 - None
- **Hollywood:** 6278 HWY 162, Hollywood, SC 29449, Monday, November 19, 2018 at 6 PM
 - Question about the use of funds for tiny houses. Staff explained HOME program.
- **John's Island:** Library, 3531 Maybank Highway, John's Island, Wednesday, November 28, 2018 at 12:30 p.m.
 - Meeting was a round-table. After discussing the HUD funding and other department resources, a general discussion took place, which included using funds for sidewalks, fair housing versus affordable housing, and issues with heirs' property.
- **Awendaw:** 6971 Doar Rd, Awendaw, Thursday, December 6, 2018 at 7 PM
 - Question about HOME funding and how it can be used. Staff explained HOME program.
- **Mount Pleasant:** Park West Recreation Complex Gymnasium, 1251 Park West Blvd., Mount Pleasant, Tuesday, December 11, 2018 at 6 PM
 - None
- **Charleston County:** County Council Chambers, 4045 Bridge View Drive, North Charleston, Tuesday, March 12, 2019 at 6:30 PM
 - One comment received. Comment was about broader issues with the federal government – not specifically about the projects being funded in PY2019.
- **City of North Charleston:** Buist Meeting Room, 2500 City Hall Lane, North Charleston, Thursday, March 14, 2019 at 7 PM
 - Citizen requested that an emphasis be placed on more affordable housing based on his concerns of gentrification. He also expressed his concern that developers were acquiring property for development leaving fewer options for LMI households.
 - Response: There are a total of 9 affordable housing projects proposed for PY2019. All of the projects will be subject to an affordability period so that they stay affordable for LMI households for a certain amount of time (according to HUD guidelines). Two of the nine projects will also be new construction in a land trust, so those properties will stay affordable for 99+ years.
- **Public Comment Period:** 3/13/2019 – 4/13/2019
 - No comments received

CARES Act Funding – Citizen Participation

- **Public Comment Period for CARES Act Funding: 5/1/2020 – 5/6/2020**
 - **Question:** The public comments made from open through today, are those posted anywhere or are they just for the consideration of your department (and HUD?).
 - **Response:** All comments will be published with the PY2019 Annual Action Plan, which will be on our website once HUD approves.
 - **Question:** Have the new applications opened up for additional HUD funding through the county yet?
 - **Response:** The application has closed and you can see the plan for the CARES Act funding on the Community Development website:
<https://www.charlestoncounty.org/departments/community-development/index.php>
 - **Question:** Can you tell me when the open and end dates for the application were?
 - **Response:** The application opened on April 20th and closed on Thursday, April 23, 2020 at 5 PM. Based on community priorities, the Community Development Department reached out to organizations about applying for these funds.
- **Public Comment Period for CARES Act Funding: 5/14/2020 – 5/19/2020**
 - **No comments received**

CARES Act Funding – Citizen Participation

- **Public Comment Period for CARES Act Funding – Round 3: 10/23/2020 – 10/28/2020**
 - **No comments received**

CARES Act Survey Results

TOTAL RESPONSES: 1,255

Question: What are the greatest needs for the Charleston community as a whole? (Please check your top 5 choices)

Priority #	Description	Count of Responses (#)	Percentage of Total Responses (%)
1	Provide housing assistance payments for rent, mortgage, utilities.	958	76.6
2	Access to essential medical services and medication for vulnerable individuals and families.	887	71
3	Access to healthy food for vulnerable individuals and families.	858	68.6
4	Provide essential services to people experiencing homelessness including childcare, education services,	843	67.4

	outreach, employment assistance, outpatient health services, legal services, mental health services, substance abuse treatment services, and transportation.		
5	Prevent individuals from becoming homeless and rapidly rehouse homeless individuals.	707	56.6
6	Operate emergency shelters by providing maintenance, rent, repair, security, fuel, equipment, insurance, utilities, food, furnishings, and supplies necessary for the operation.	603	48.2
7	Provide Hotel/Motel Vouchers for homeless families or individuals.	353	28.2
8	Support businesses manufacturing medical supplies.	340	27.2
9	Provide legal services to vulnerable individuals and families.	200	16
10	Other: Small business support/relief *	26	2
11	Other: Financial support (primarily for individuals)*	21	1.6

*123 respondents chose “other” and filled out information for this choice. All 123 responses were examined, categorized, and aggregated by similar types of comments. The only types of comments reported here were those groupings representing over 1 percent of total responses.

Question: Please let us know about anything else the Charleston community needs addressed related to COVID-19.

468 Comments were received. All 468 responses were examined, categorized, and aggregated by similar types of comments. The only types of comments reported here were those groupings representing around 5 percent or more of the total comments.

Ranking	Description	Count of Comments (#)	Percentage of Total Comments (%)
1	Financial support (primarily for individuals)	86	18
2	Safety measures (need for PPE, hand sanitizer, social distancing enforcement; masks most requested item)	78	17
3	Testing/tracing for COVID-19	56	12
4	Small business support/relief	39	8
5	Bilingual services	22	5
6	Essential worker assistance (hazard pay, support, etc)	22	5

Appendix B: PUBLIC NOTICES AND PUBLIC HEARINGS



Charleston County and City of North Charleston

Program Year 2019

Urban Entitlement Programs

REQUEST FOR APPLICATION (RFA) AND PUBLIC HEARINGS ANNOUNCEMENT

Charleston County's Community Development Department is the administering agency for the County of Charleston Urban Entitlement Grants for the Community Development Block Grant (CDBG) Program; Emergency Solutions Grant (HESG); Community Housing Development Organization (CHDO); and, the HOME Investment Partnership Program (HOME). These grant programs are funded by an allocation from the U.S. Department of Housing and Urban Development (HUD) and are intended to fund housing and community development activities throughout Charleston County.

APPLICATION RELEASE DATE: On Monday, November 26, 2018, the Charleston County Community Development Department will issue a Request for Applications (RFA) for the Program Year 2019 Urban Entitlement Program Funding Cycle. Special attention and priority will be given to applicants that successfully align with strategies to address unmet goals and objectives as outlined in the Consolidated Plan. For information about the Consolidated Plan, goals and funding priorities, please visit <https://www.charlestoncounty.org/departments/community-development/index.php>. Two Pre-Application Trainings will be held to provide an overview of the application, program requirements, and funding process. Details about the trainings can be found at <https://www.charlestoncounty.org/departments/community-development/RFA.php>.

RFA DEADLINE: Applications are due Monday, January 7, 2019 at noon and must be submitted electronically at <https://www.charlestoncounty.org/departments/community-development/RFA.php>. THE APPLICATION AND THE MANDATORY FORMS AND ATTACHMENTS MUST BE SUBMITTED ONLINE BY THE DUE DATE/TIME TO BE ACCEPTED.

PUBLIC HEARINGS: The Department conducts public hearings during the course of a year for the purpose of providing information on Community Programs to County residents and to receive comments from citizens regarding program activities. At least once per year, generally scheduled to coincide with each year's annual HUD allocation, a public hearing is held in participating jurisdictions. Public hearings will be held at Town Halls between October and December 2018. Schedule available here: <https://www.charlestoncounty.org/departments/community-development/index.php>.

For additional information, call Anna Eskridge, Ph.D., Program Manager at (843) 202-6960 or via e-mail at aeskridge@charlestoncounty.org.

CHARLESTON COUNTY PROCUREMENT
 4045 BRIDGE VIEW DR, C-202
 NORTH CHARLESTON SC 29405-7464
 Attn: Gwendolyn Parrilla

AFFIDAVIT OF PUBLICATION

The Post and Courier

State of South Carolina
 County of Charleston

Personally appeared before me the undersigned advertising clerk of the above indicated newspaper published in the city of Charleston, county and state aforesaid, who, being duly sworn, says that the advertisement of

(copy attached)

appeared in the issues of said newspaper on the following day(s):

10/17/18 Wed PC
 10/17/18 Wed CNW

at a cost of \$224.76
 Account# 103042
 Order# 1736892
 P.O. Number:

Subscribed and sworn to before me this 18th day of October A.D. 2018

[Signature]
 advertising clerk



[Signature]
 NOTARY PUBLIC, SC
 My commission expires

REQUEST FOR APPLICATIONS (RFA) AND PUBLIC HEARINGS ANNOUNCEMENT: Charleston County and City of North Charleston Program Year 2019 Urban Entitlement Programs. Charleston County's Community Development Department is the administering agency for the County of Charleston Urban Entitlement Grants for the Community Development Block Grant (CDBG) Program; Emergency Solutions Grant (ESG); Community Housing Development Organization (CHDO); and the HOME Investment Partnership Program (HOME). These grant programs are funded by an allocation from the U.S. Department of Housing and Urban Development (HUD) and are intended to fund housing and community development activities throughout Charleston County. APPLICATION RELEASE DATE: On Monday, November 26, 2018, the Charleston County Community Development Department will issue a Request for Applications (RFA) for the Program Year 2019 Urban Entitlement Program Funding Cycle. Special attention and priority will be given to applicants that successfully align with strategies to address unmet goals and objectives as outlined in the Consolidated Plan. For information about the Consolidated Plan, goals and funding priorities, please visit <https://www.charlestoncounty.org/departments/community-development/index.php>. Two Pre-Application Trainings will be held to provide an overview of the application, program requirements, and funding process. Details about the trainings can be found at <https://www.charlestoncounty.org/departments/community-development/index.php>. RFA DEADLINE: Applications are due Monday, January 7, 2019 at noon and must be submitted electronically at <https://www.charlestoncounty.org/departments/community-development/index.php>. THE APPLICATION AND THE MANDATORY FORMS AND ATTACHMENTS MUST BE SUBMITTED ONLINE BY THE DUE DATE/TIME TO BE ACCEPTED. PUBLIC HEARINGS: The Department conducts public hearings during the course of a year for the purpose of providing information on Community Programs to County residents and to receive comments from citizens regarding program activities. At least once per year, generally scheduled to coincide with each year's annual HUD allocation, a public hearing is held in participating jurisdictions. Public hearings will be held at Town Halls between October and December 2018. Schedule available here: <https://www.charlestoncounty.org/departments/community-development/index.php>. For additional information, call Anna Eskridge, Ph.D., Program Manager at (843) 202-6900 or via e-mail at eskridge@charlestoncounty.org.

AD# 1736892



Charleston County and City of North Charleston

Program Year 2019

Urban Entitlement Programs

NOTICE OF AVAILABILITY: SCHEDULE OF ANNUAL PUBLIC HEARING DATES

Charleston County's Community Development Department is the administering agency for the County of Charleston Urban Entitlement Grants for the Community Development Block Grant (CDBG) Program; Emergency Solutions Grant (HESG); Community Housing Development Organization (CHDO); and, the HOME Investment Partnership Program (HOME). These grant programs are funded by an allocation from the U.S. Department of Housing and Urban Development (HUD) and are intended to fund housing and community development activities throughout Charleston County.

The Department conducts public hearings during the course of a year for the purpose of providing information on Community Programs to County residents and to receive comments from citizens regarding program activities. At least once per year, generally scheduled to coincide with each year's annual HUD allocation, a public hearing is held in each of the participating jurisdictions (as decided by the jurisdiction). The following jurisdictions have requested the Department to discuss the Urban Entitlement Grants at the following time/dates:

- **Ravenel:** 5962 Highway 165 Ste 100, Ravenel, Tuesday, October 30, 2018 at 5:45 PM
- **James Island:** 1122 Dills Bluff Road, James Island, Thursday, November 15, 2018 at 7 PM
- **Hollywood:** 6278 HWY 162, Hollywood, SC 29449, Monday, November 19, 2018 at 6 PM
- **John's Island:** Library, 3531 Maybank Highway, John's Island, Wednesday, November 28, 2018 at 12:30 p.m.
- **Awendaw:** 6971 Doar Rd, Awendaw, Thursday, December 6, 2018 at 7 PM
- **Mount Pleasant:** Park West Recreation Complex Gymnasium, 1251 Park West Blvd., Mount Pleasant, Tuesday, December 11, 2018 at 6 PM

For additional information, call Jean Sullivan, Director at (843) 202-6960 or via e-mail at jsullivan@charlestoncounty.org

This notice replaces a previous notice published on February 18, 2019. The County of Charleston is pleased to announce its draft Annual Action Plan. The Plan is a document that outlines how the County of Charleston, its participating jurisdictions, and the City of North Charleston propose to spend federal

grant dollars from the U.S. Department of Housing and Urban Development during the Program Year 2019 (PY19). All interested parties are encouraged to attend public hearings to offer comments on the plan. Proposed projects for Charleston County funds will be presented to Charleston County Council for approval and incorporation into the PY19 Annual Action Plan on Tuesday, March 12, 2019 at 6:30 PM (Charleston County Council Chambers, 4045 Bridge View Drive in North Charleston). Proposed projects for City of North Charleston funds will be presented to North Charleston City Council for approval and incorporation into the PY19 Annual Action Plan on Thursday, March 14, 2019 at 7 PM (Council Chambers, 3rd floor, 2500 City Hall Lane, North Charleston, SC). A list of the proposed projects is available for review at www.charlestoncounty.org/departments/community-development. Starting March 13, 2019, a draft plan will be available for review online (website listed above), or in-person at the Charleston County Community Development Department (Suite C216, 4045 Bridge View Drive, North Charleston, SC, 29405) Monday through Friday between the hours of 9:00 a.m. – 4:30 p.m. A Substantial Amendment to the PY16-2020 Consolidated Plan will also be included with this draft; the amendment updates expected outcomes for the 5-year period. **Written comments on the draft plan should be addressed to: Dr. Anna Eskridge, Program Manager, Charleston County Community Development Department, at the above address. The deadline for receipt of written comments is April 13, 2019. Telephone (843) 202-6960.** The Plan will be submitted to the U.S. Department of Housing & Urban Development on or around May 15, 2019.

CHARLESTON COUNTY PROCUREMENT
 4045 BRIDGE VIEW DR, C-202
 NORTH CHARLESTON SC 29405-7464
 Attn: Coward/Debra Harris/119

**PUBLIC NOTICE/
 PUBLIC HEARING
 CHARLESTON COUNTY
 COMMUNITY
 DEVELOPMENT
 DEPARTMENT
 URBAN ENTITLEMENT
 PROGRAM**

PY 2019 Annual Action Plan and Substantial Amendment to the Consolidated Plans This notice replaces a previous notice published on February 18, 2019. The County of Charleston is pleased to announce its draft Annual Action Plan. The Plan is a document that outlines how the County of Charleston, its participating jurisdictions, and the City of North Charleston propose to spend federal grant dollars from the U.S. Department of Housing and Urban Development during the Program Year 2019 (PY19). All interested parties are encouraged to attend public hearings to offer comments on the plan. Proposed projects for Charleston County funds will be presented to Charleston County Council for approval and incorporation into the PY19 Annual Action Plan on Tuesday, March 12, 2019 at 4:30 PM (Charleston County Council Chambers, 4045 Bridge View Drive in North Charleston). Proposed projects for City of North Charleston funds will be presented to North Charleston City Council for approval and incorporation into the PY19 Annual Action Plan on Thursday, March 14, 2019 at 7 PM (Council Chambers, 3rd floor, 2500 City Hall Lane, North Charleston, SC). A list of the proposed projects is available for review at www.charlestoncounty.org/departments/community-development. Starting March 13, 2019, a draft plan will be available for review online (website listed above), or in-person at the Charleston County Community Development Department (Suite C216, 4045 Bridge View Drive, North Charleston, SC, 29405) Monday through Friday between the hours of 9:00 a.m. - 4:30 p.m. A Substantial Amendment to the PY16-2020 Consolidated Plan will also be included with this draft; the amendment updates expected outcomes for the 5-year period. **Written comments on the draft plan should be addressed to: Dr. Anna Eskridge, Program Manager, Charleston County Community Development Department, at the above address. The deadline for receipt of written comments is April 13, 2019. Telephone (843) 202-6960.** The Plan will be submitted to the U.S. Department of Housing & Urban Development on or around May 15, 2019.

AD# 176945

AFFIDAVIT OF PUBLICATION

The Post and Courier

State of South Carolina
 County of Charleston

Personally appeared before me the undersigned advertising clerk of the above indicated newspaper published in the city of Charleston, county and state aforesaid, who, being duly sworn, says that the advertisement of

(copy attached)

appeared in the issues of said newspaper on the following day(s):

02/26/19 Tue PC
 02/26/19 Tue CNW

at a cost of **\$210.10**
 Account# **103042**
 Order# **1769945**
 P.O. Number:

Subscribed and sworn to before me this 27th day of February A.D. 2019

[Signature]
 advertising clerk



[Signature]
 NOTARY PUBLIC, SC
 My commission expires



Charleston County Government

@ChasCountyGov

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Charleston County Government

March 15 at 2:00 PM · 🌐

Did you know the County receives Housing and Urban Development funding to help low-income citizens? The 2019 Annual Action Plan outlines which projects the County plans to fund, and we'd like your feedback! Please submit comments by April 13, 2019. Contact: Community Development Department, (843) 202-6960.

<https://www.charlestoncounty.org/.../files/PY19-Draft-Plan.pdf>

1 Comment 2 Shares

CARES Act Funding Information

May 14, 2020 update:

- The Substantial Amendment to the PY2019 Annual Action Plan includes the CDBG and ESG funding from the CARES Act; it is available to review on the Community Development [website](#)
- The updated Citizen Participation Plan is available to review on the Community Development [website](#)
- Public Comment period on the CARES Act funding/PY2019 Annual Action Plan Substantial Amendment and updates to the Citizen Participation Plan begins May 14, 2020 and ends May 19, 2020. All public comments should be submitted by May 19, 2020 to Dr. Anna Eskridge by emailing AEskridge@charlestoncounty.org. You can also call 843-202-6960 with your comment. HUD is allowing flexibility to reduce the public comment period to not less than 5 days.

May 1, 2020 update:

- The Substantial Amendment to the PY2019 Annual Action Plan includes the CDBG and ESG funding from the CARES Act; it is available to review on the Community Development [website](#)
- The updated Citizen Participation Plan is available to review on the Community Development [website](#)
- Public Comment period on the CARES Act funding/PY2019 Annual Action Plan Substantial Amendment and updates to the Citizen Participation Plan begins May 1, 2020 and ends May 6, 2020. All public comments should be submitted by May 6, 2020 to Dr. Anna Eskridge by emailing AEskridge@charlestoncounty.org. You can also call 843-202-6960 and leave a message with your comment. HUD is allowing flexibility to reduce the public comment period to not less than 5 days.

Applications:

Based on community priorities, the Community Development Department reached out to organizations about applying for these funds.

Published in the Post & Courier April 20, 2020



PUBLIC NOTICE: CARES ACT FUNDING

The U.S. Department of Housing and Urban Development (HUD) will provide funding to Charleston County Community Development Department from the CARES Act to be used to prevent, prepare for, and respond to the coronavirus pandemic (COVID-19). Funds are anticipated to be received for the Community Development Block Grant (CDBG) and the Emergency Solutions Grant (ESG). Priority will be given to organizations that successfully align with strategies to address the needs of low-to-moderate income individuals with respect to COVID-19.

Information about the application, public hearing(s), updates to the Citizen Participation Plan, and any amendments to Annual Action Plans (and possibly the PY2016-2020 Consolidated Plan) will be available on the Community Development website as it becomes available: www.charlestoncounty.org/departments/community-development/

Please contact Jean Sullivan, Director (JSullivan@charlestoncounty.org) with any questions.

Survey released April 16, 2020

CARES Act Funding Survey

Survey will close Monday, April 20, 2020 at 12 P.M. (Noon). You can access it here:

<https://forms.gle/WwyQFoV3Xo9JQUdn9>

The U.S. Department of Housing and Urban Development (HUD) will provide funding to Charleston County Community Development Department from the CARES Act to be used to prevent, prepare for, and respond to the coronavirus pandemic (COVID-19). Staff will begin promptly implementing the funding by taking the first required step by HUD, which is to collect community input, and defining the most pressing needs within the community.

Funds are anticipated to be received for the Community Development Block Grant (CDBG) in the amount of \$1,090,016 and the Emergency Solutions Grant (ESG) in the amount of \$535,900.

The options presented to the community are defined by the allowable HUD activities. The Community Development Department is beginning to solicit feedback from the community to identify these needs by releasing a survey to community organizations, stakeholders and elected officials. The questionnaire will help staff determine the prioritization of these funds to combat some of the impact of COVID-19 in Charleston County.

Please contact Jean Sullivan, Director (JSullivan@charlestoncounty.org) with any questions.

CHARLESTON COUNTY PROCUREMENT
4045 BRIDGE VIEW DR, C-202
NORTH CHARLESTON SC 29405-7464
Attn: Swendolyn Parrilla

AFFIDAVIT OF PUBLICATION

The Post and Courier

State of South Carolina
County of Charleston

Personally appeared before me the undersigned advertising clerk of the above indicated newspaper published in the city of Charleston, county and state aforesaid, who, being duly sworn, says that the advertisement of

(copy attached)

appeared in the issues of said newspaper on the following day(s):

04/20/20 Mon PC
04/20/20 Mon CNW

at a cost of **\$98.92**
Account# **103042**
Order# **1868873**
P.O. Number:

Subscribed and sworn to before
me this 20th day
of April
A.D. 2020

[Signature]
advertising clerk

[Signature]
NOTARY PUBLIC, SC
My commission expires



CHARLESTON COUNTY PUBLIC NOTICE CARES ACT FUNDS
The U.S. Department of Housing and Urban Development (HUD) will provide funding to Charleston County Community Development Department from the CARES Act to be used to address...
...information about the application, public hearings, details in the Citizen Participation Plan, and any amendments to Annual Action Plans (and possibly the FY2021-2022 Consolidated Plan) will be available on the Community Development website as it becomes available www.charcountysc.gov
...with any questions. ADR 10007

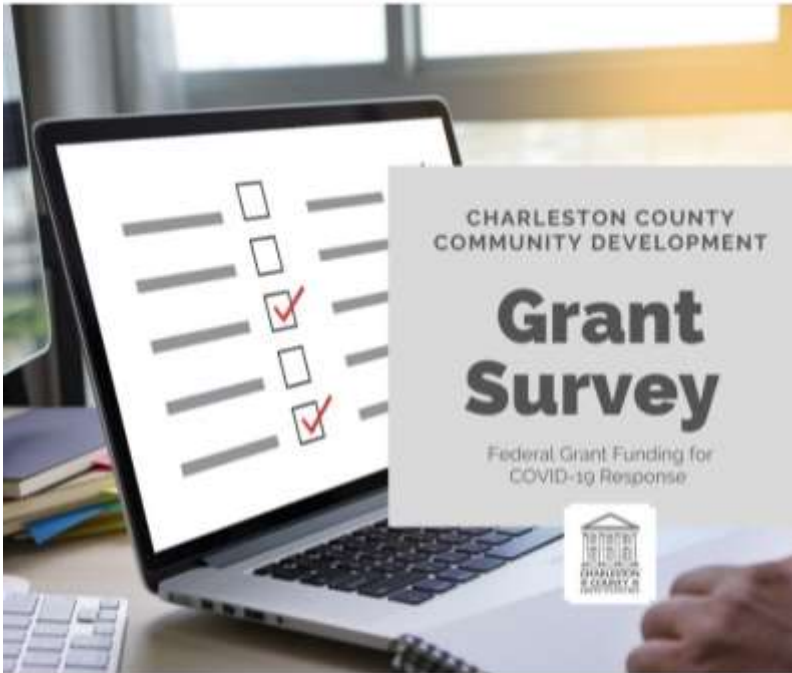


Charleston County Government



April 20 at 7:49 AM · 🌐

If you haven't already, please take a moment this morning to take this survey. It will help the County determine community needs as we apply for federal grant funding to respond to the COVID-19 pandemic. The deadline is noon today (Monday, April 20): <https://bit.ly/2z1R9cg> #chsnews



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5 Shares

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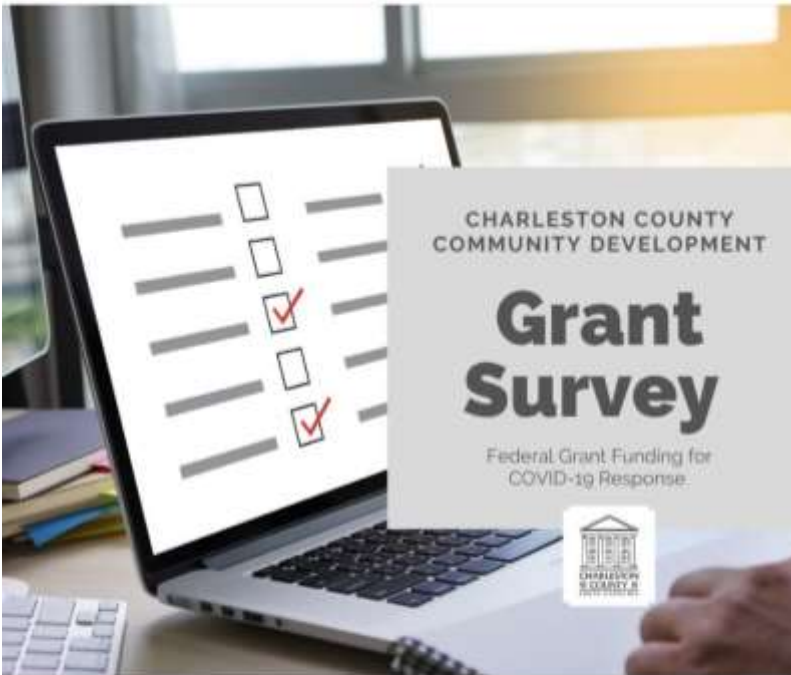


Charleston County Government



April 16 at 4:19 PM · 🌐

We need your help! Please take this survey so the County can determine community needs as we apply for federal grant funding to respond to the COVID-19 pandemic. Take the survey now: <https://bit.ly/2z1R9cg>



👍 3

14 Shares

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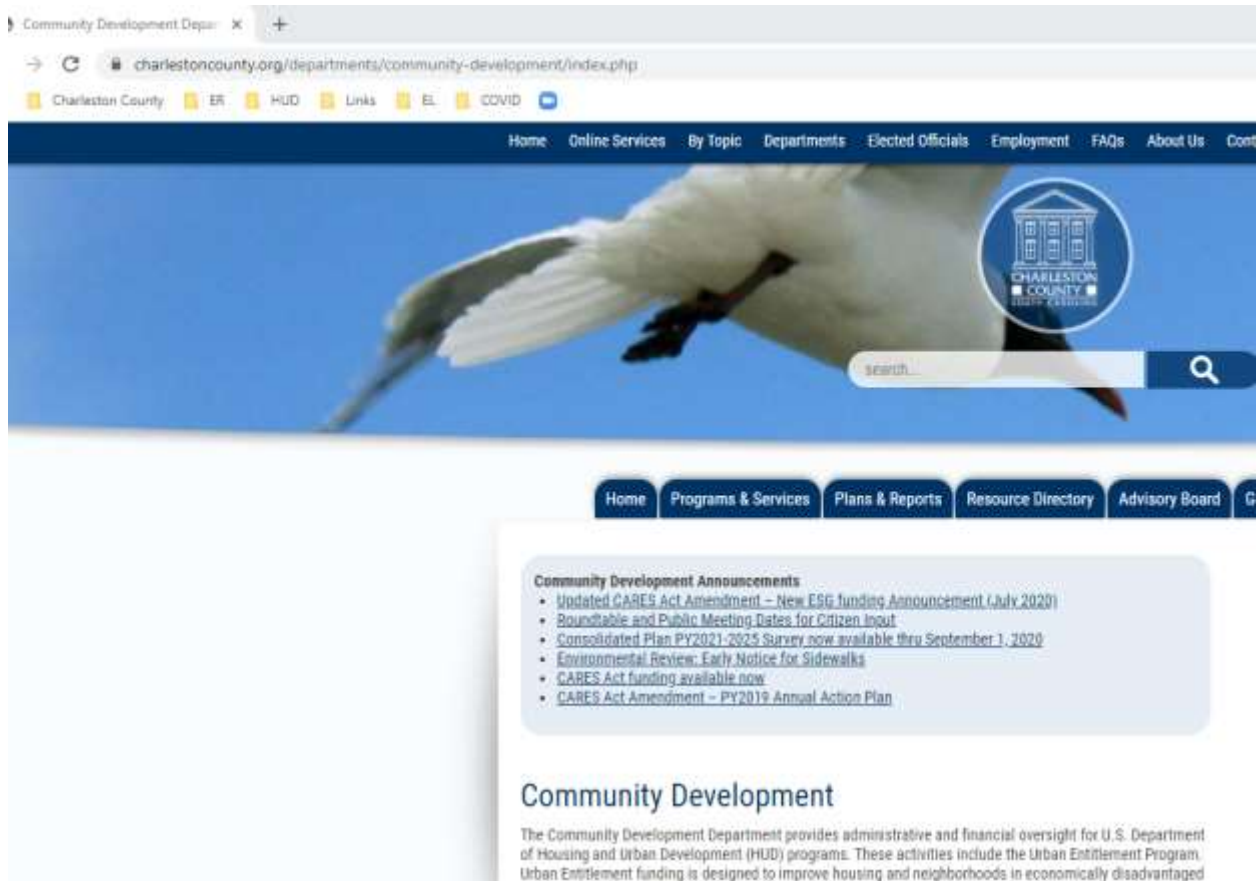
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CARES Act – Round 2

Summary of Changes posted to the Charleston County Community Development website on July 2, 2020 (<https://www.charlestoncounty.org/departments/community-development/index.php>)

Notice states: “Updated CARES Act Amendment – New ESG funding Announcement” (July 2020)



The screenshot shows a web browser window with the URL [charlestoncounty.org/departments/community-development/index.php](https://www.charlestoncounty.org/departments/community-development/index.php). The page features a navigation menu with links for Home, Online Services, By Topic, Departments, Elected Officials, Employment, FAQs, About Us, and Contact. Below the navigation is a search bar and a secondary menu with links for Home, Programs & Services, Plans & Reports, Resource Directory, and Advisory Board. The main content area displays a section titled "Community Development Announcements" with a list of links:

- [Updated CARES Act Amendment – New ESG funding Announcement \(July 2020\)](#)
- [Roundtable and Public Meeting Dates for Citizen Input](#)
- [Consolidated Plan PY2021-2025 Survey now available thru September 1, 2020](#)
- [Environmental Review: Early Notice for Sidewalks](#)
- [CARES Act funding available now](#)
- [CARES Act Amendment – PY2019 Annual Action Plan](#)

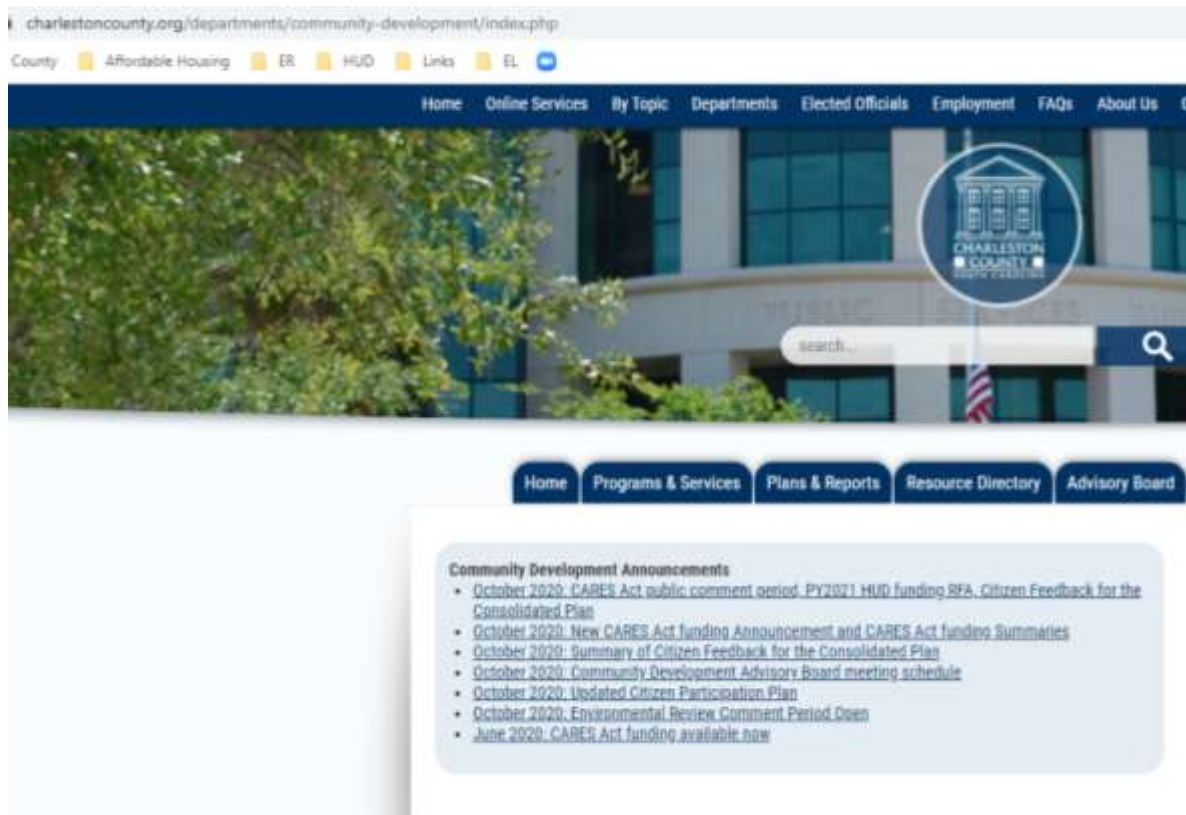
Below the announcements is a section titled "Community Development" with a brief description: "The Community Development Department provides administrative and financial oversight for U.S. Department of Housing and Urban Development (HUD) programs. These activities include the Urban Entitlement Program. Urban Entitlement funding is designed to improve housing and neighborhoods in economically disadvantaged

CARES Act – Round 3

Summary of Changes posted to the Charleston County Community Development website on October 22, 2020 (<https://www.charlestoncounty.org/departments/community-development/index.php>)

Notice states: “October 2020: New CARES Act funding Announcement and CARES Act funding Summaries”

Also see the ad on the next page





PUBLIC NOTICE: CARES ACT FUNDING

The U.S. Department of Housing and Urban Development (HUD) will provide funding to Charleston County Community Development Department from the CARES Act to be used to prevent, prepare for, and respond to the coronavirus pandemic (COVID-19). Funds are anticipated to be received for the Community Development Block Grant (CDBG) in the amount of \$1,793,877. The funding will be used for financial assistance for low-to-moderate income individuals with respect to COVID-19. Information about the funding and the amendment to PY2019 Annual Action Plan is available on the Community Development website: www.charlestoncounty.org/departments/community-development/ A public comment period will last for 5 days. Comments should be addressed to Dr. Anna Eskridge, Program Manager at (843) 202-6960 or via e-mail at aeskridge@charlestoncounty.org by the end of the day on October 28, 2020.

...

<remaining text of this ad does not deal with CARES Act>

CHARLESTON COUNTY PROCUREMENT
4045 BRIDGE VIEW DRIVE SUITE B-270
NORTH CHARLESTON SC 29405-7464

AFFIDAVIT OF PUBLICATION

The Post and Courier

State of South Carolina

County of Charleston

Personally appeared before me the undersigned advertising clerk of the above indicated newspaper published in the city of Charleston, county and state aforesaid, who, being duly sworn, says that the advertisement of

(copy attached)

10/23/20 Fri PC
10/23/20 Fri CNW

at a cost of \$345.26
Account# 103042
Order# 1903247
P.O. Number:

Subscribed and sworn to before
me this 23rd day
of October
A.D. 2020

[Signature]
advertising clerk



[Signature]
NOTARY PUBLIC, SC
My commission expires

PUBLIC NOTICE: CARES ACT FUNDING: The U.S. Department of Housing and Urban Development (HUD) will provide funding to Charleston County Community Development from the CARES Act to be used to prevent, prepare for, and respond to the coronavirus pandemic (COVID-19). Funds are anticipated to be received for the Community Development Block Grant (CDBG) in the amount of \$1,793,677. The funding will be used for financial assistance for low-to-moderate income individuals with respect to COVID-19. Information about the funding and the amendment to PY2019 Annual Action Plan is available on the Community Development website: www.charlestoncounty.org/departments/community-development/. A public comment period will last for 5 days. Comments should be addressed to Dr. Anna Eskridge, Program Manager at (843) 202-4960 or via e-mail at aeskridge@charlestoncounty.org by the end of the day on October 28, 2020.

REQUEST FOR APPLICATIONS (RFA) AND CONSOLIDATED PLAN ANNOUNCEMENT: Charleston County and City of North Charleston Program Year 2021 Urban Entitlement Programs. Charleston County's Community Development Department is the administering agency for the County of Charleston Urban Entitlement Grants for the Community Development Block Grant (CDBG) Program; Emergency Solutions Grant (ESG); Community Housing Development Organization (CHDO); and the HOME Investment Partnership Program (HOME). These grant programs are funded by an allocation from the U.S. Department of Housing and Urban Development (HUD) and are intended to fund housing and community development activities throughout Charleston County.

APPLICATION RELEASE DATE: On Monday, November 23, 2020, the Charleston County Community Development Department will issue a Request for Applications (RFA) for the Program Year 2021 Urban Entitlement Program Funding Cycle. Special attention and priority will be given to applicants that successfully align with strategies to address unmet goals and objectives as outlined in the new PY2021-2025 Consolidated Plan. For information about the Consolidated Plan, goals and funding priorities, please visit <https://www.chadivision.org/departments/community-development/index.php>. Two Pre-Application Trainings will be held to provide an overview of the application, program requirements, and funding process. Details about the trainings can be found at <http://www.charlestoncounty.org/departments/community-development/rfa.php>.

RFA DEADLINE: Applications are due Thursday, January 7, 2021 at noon and must be submitted electronically.

<https://www.charlestoncounty.org/departments/community-development/rfa.php> THE APPLICATION AND THE MANDATORY FORMS AND ATTACHMENTS MUST BE SUBMITTED ONLINE BY THE DUE DATE/TIME TO BE ACCEPTED. For additional information, call Anna Eskridge, Ph.D., Program Manager at (843) 202-6960 or via e-mail at aeskridge@charlestoncounty.org.

CONSOLIDATED PLAN (PY2021-2025): Citizen input from roundtable meetings and a community survey from July and August 2020 is being used to prioritize HUD funding in the next Consolidated Plan (PY2021-2025). In addition, the Citizen Participation Plan has been updated. The citizen participation results and citizen participation plan are published on the Community Development website (<https://www.charlestoncounty.org/departments/community-development/index.php>). If you have comments or feedback on these items, please call Anna Eskridge, Ph.D., Program Manager at (843) 202-6960 or via e-mail at aeskridge@charlestoncounty.org by November 23, 2020.
AD# 1903247

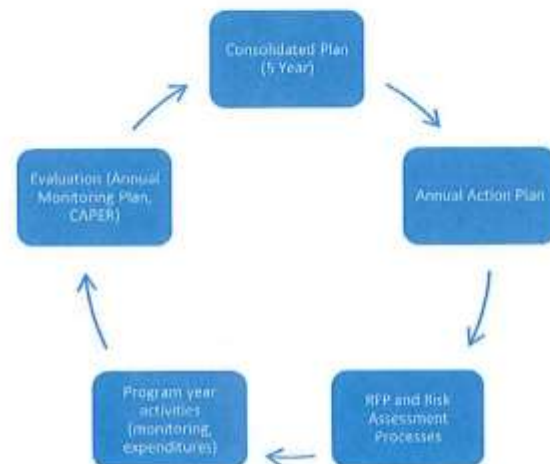
Appendix C: MONITORING PLAN



GENERAL

I. Introduction

Charleston County is committed to providing effective, efficient and equitable community services to the towns, cities, and organizations within its jurisdiction. The Annual Monitoring Plan is a guide for delivering these services while keeping Charleston County and its Urban Entitlement sub-recipients in compliance with Federal, State and County regulations. A strong monitoring system will allow staff to accurately determine the level of risk the County takes when granting monies, build capacity within the community, ensure timeliness of expenditures, and provide accurate evaluation for future planning.



Through development of an annual monitoring plan, staff can effectively plan for events in the coming year as well as take time to recognize what works, what can be done better, and what practices have become irrelevant. This kind of "big picture" thinking serves an exercise in planning and regrouping. Plus, as can be seen in later parts of this plan, the Annual Monitoring plan ties-in directly with Departmental goals and objectives.

II. Monitoring Plan Objectives and Strategy

Charleston County Community Service (CCCS) has identified the following objectives and strategies for monitoring:

- **Accurately Assessing Risk**
- **Identifying Technical Assistance Needs & Increasing Capacity**
- **Ensuring Timely Expenditures:**
- **Keeping Charleston County in Compliance through training**
- **Establishing Tools and Systems for Compliance**
- **Identifying Innovative Tools & Techniques: Best Practices**



Charleston County Community Services

Procedure: Monitoring – Plan

Issued By: Community Services

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III. Ongoing Monitoring

A. Accurately Assessing Risk :

Charleston County Community Services staff, will determine the level of monitoring a sub-recipient will receive using a risk model. The model uses the following elements, prior performance, capacity, type of project, investment level, and experience in managing federal funds, to determine the risk associated with a particular project. The risk will be examined during the first quarter of the new program year, with a monitoring schedule resulting in the second quarter and actual on site and/or desk top monitoring taking place during the 3rd and 4th quarters.

NOTE: This model does not take the place of or supersede the judgment of Community Services staff. Regardless of the results of the risk model a sub-recipient may be monitored based strictly on the judgment of Community Services management.

B. Identifying Technical Assistance Needs & Increasing Capacity:

- Sub-recipient reports serve as an ongoing oversight tool to ensure that projects are operating within the scope of their project. The review by staff provides a valuable point of contact as well as an effective tool for determining the type and depth of technical assistance a sub-recipient may need. Whether a recipient reports monthly or quarterly staff will review and analyze monthly/quarterly reports in tandem with pay requests for timeliness of expenditure of funds and project activity as outlined in the sub recipient's agreement.
- In addition to reviewing reports staff will determine each projects specific compliance issues and provide technical support to ensure the regulatory compliance with Davis Bacon, Section 3, Fair Housing, and minority and women contractors for construction projects.
- Staff will also ensure that during the life of the project they observe project for quality of work, i.e. housing rehabilitation and construction of residential housing and buildings, infrastructure projects such as sidewalks, drainage, and compliance with regulations, as needed.

C. Ensuring Timely Expenditures:

- Staff will review financial reports in relation to the project timeline to determine if expenditures are on target. They will communicate any deviations with subs on a monthly/quarterly basis, ensuring that any extensions are warranted and submitted in a timely manner.



Charleston County Community Services

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D. Training of sub-recipients is another important strategy utilized to strengthen partnerships and build capacity. Training of sub recipients can be carried out by several methods:

- **Annual Pre-Proposal meeting-** a pre-proposal conference, is held shortly after the announcement of funds availability. The basic application process is explained along with expectations for management of a successful project.
- **Post-Award meeting-**groups of sub-recipients with like projects/activities are brought together for a meeting prior to the execution of a contract. Staff will cover expectations, outcomes and other compliance issues deemed necessary by the past years performance. This also provides a networking environment that Community Services wants to foster in our sub-recipient community.
- **Monitoring:** Monitoring activities whether during the monthly reviews or on-site monitoring ensure that we reach 100% of our sub recipients. Our monitoring strategies include on-site field visits, open communications, desktop monitoring, and assisting agencies in creating good recordkeeping systems. The requirements for standard recordkeeping, LMI eligibility determination, relevant demographics, financial management, quality assurance methods and community outreach are applied to all projects.

E. Documenting Compliance: Establishing Tools and Systems for Compliance.

- Staff will analyze reporting documents annually to assess if any additional reporting requirements.
- Internal spreadsheets will be maintained electronically containing information sufficient to immediately assess the performance of each sub.

F. Identifying Innovative Tools & Techniques: Best Practices

- Staff will work to identify and communicate programs that are innovative and can be replicated to provide more effective and efficient services using Urban Entitlement funds.



IV. On-site Monitoring

By far the most exhaustive technique in the Compliance Auditor's toolbox, the on-site monitoring is vital to the continued compliance of not only the sub-recipients, but the compliance of Charleston County as well. Briefly stated, the on-site monitoring is designed to:

- Identify aspects of the project where the organization is performing well and poorly while building capacity
- Assess compliance with program requirements
- Determine whether record keeping is adequate
- Prepare and implement timely follow-up activities

The results of the on-site monitoring are as important as the monitoring itself. Sub-recipients are to receive the results of their visit in a timely manner (ideally within 45 business days after the monitoring visit) and provided with ample time and assistance to resolve issues before the close of the program year.

Charleston County's current monitoring objectives: as determined by HUD regulations.

A. Management Plan

Ensure that sub-recipients have an appropriate process for how the grant will be managed as well as other areas of business operation and who the responsible staff will be.

B. Record Keeping Systems

Ensure that sub-recipients establish/maintain a record keeping and filing system to maintain documentation on program benefit and compliance with other applicable laws.

C. Financial Management

Ensure that the sub-recipient establish appropriate accounts for CD funds awarded and maintain the necessary financial records on the receipt and disbursement of funds as well as supporting documentation.

D. On-Site Monitoring

1. To determine if a sub-recipient is carrying out its community development program, and its individual activities, as described in the application for assistance and the sub-recipient Agreement.



Charleston County Community Services

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2. To determine if a sub-recipient is carrying out its activities in a timely manner, in accordance with the schedule included in the Agreement.
3. To determine if a sub-recipient is charging costs to the project that are eligible under applicable laws and regulations, and are reasonable in light of the services or products delivered.
4. To determine if a sub-recipient is conducting its activities with adequate control over program and financial performance, and in a way that minimizes opportunities for waste, mismanagement, fraud, and abuse.
5. To assess if the sub-recipient has continuing capacity to carry out the approved project, as well as other grants for which it may apply.
6. To identify potential problem areas and to assist the sub-recipient in complying with applicable laws and regulations.
7. To assist sub-recipients in resolving compliance problems through discussion, negotiation, and the provision of technical assistance and training.
8. To provide adequate follow up measures to ensure that performance and compliance deficiencies are corrected by sub-recipients, and not repeated.
9. To comply with the federal monitoring requirements of 24 CFR 570.501(b) and 24 CFR 85.40.
10. To determine if any conflicts of interest exist in the operation of the program, per 24 CFR 570.611.
11. To ensure that required records are maintained to demonstrate compliance with applicable regulations.



Charleston County Community Services
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V. Monitoring Staff and Schedule

Due to the increasing need to ensure that sub-recipients are trained and follow regulations, Charleston County has created a new position whose key responsibility is to conduct ongoing financial and programmatic monitoring of the sub-recipients. The Grants Compliance Auditor conducts technical support and quarterly on-site monitoring to ensure sub-recipients' compliance with HUD and County regulations. They will also be involved with the sub-recipients pre and post training sessions. The ongoing monitoring and technical support allows Charleston County to identify and correct challenges and barriers that can prohibit timely completion of the projects and proper delivery of services.

Furthermore, ongoing monitoring will be conducted by the Grants Compliance Auditor as pay requests come in from the sub-recipients and from monthly and quarterly reports. Review of the pay requests for programmatic and financial compliance will alert the Community Services Compliance Auditor to problems early in the process and perhaps alleviate issues as the sub-recipient works towards their outcomes. This "real time", early intervention will be a key step in both keeping sub-recipients compliant and in delivering technical assistance.

The Community Services Financial Officer will oversee all monitoring work and reporting. Final reports will be reviewed and issued by the Community Services Director.



Primary Tenants of Monitoring Criteria (REVISED April 2015)

1. Programmatic performance is monitored with each monthly and quarterly progress report submittal.
2. Financial performance, relating to allowable costs is monitored with each invoice submitted.
 - At least 50% of the total dollars will be reviewed during the on-site monitoring. Charleston County Community Services will also utilize these criteria when reviewing projects funded through the City of North Charleston's Urban Entitlement allocation.
3. All HOME-assisted rental projects will receive an on-sight monitoring annually, and will be inspected for code compliance. HOME-assisted rental projects will be reviewed to determine adherence to affordability requirements, habitability standards and oversight of property management in accordance with HOME requirements.

Risk Model Criteria

Elements to be considered in determining risk for CDBG and ESG projects.

1. Projects with a total score of 5 or over will receive an on-site visit
2. Projects with a total score of 4 will receive a desk top review and report will be filed with project records.
3. Projects scoring less than 4 will receive a quarterly review of their financial and progress reports submitted. The performance summary will be maintained in the project files.
4. All new subs funded at or below \$10,000 will receive an initial site visit to discuss the sub-recipient contract and reporting requirements. On-going monitoring will consist of quarterly reviews of financial and progress reporting. Technical assistance session(s) will be provided as warranted to ensure adherence to contract, evaluate performance and assess capacity to manage federal funds. The performance summary will be maintained in the project files.
5. All new sub-recipients funded at or above \$25,000 will receive an on-site monitoring visit.



Current Funding level

Score 1-3 with 1 being the lowest risk

\$25,000 or under	1
Over \$25,000 but less than \$75,000	2
Over \$75,000	3

Organizational Capacity (elements to be considered)

Score 1-3 with 1 being the lowest risk

Sub staff no changes	1
New Staff	2
New type of project for sub	3

Monitoring: Previous years' findings/concerns

Score 1-2 with 1 being the lowest risk

Minimal concerns/CAP reviewed	1
Findings	2

Prior year reporting problems

Continuous problems that have not been corrected 1

While the monitoring schedule will be developed with the above scoring, the schedule may be revised to add sub-recipients if problems are found during the review of quarterly reports or financial drawdowns.

This scoring criteria does not take the place of staff judgment. Subrecipients may be monitored based upon staff recommendation.

IMPLEMENTED BY WHOM

Financial Officer



Johanna Murray
Director, Community Development Department

3/28/17
Date

Appendix D: Citizen Participation Plan



COUNTY OF CHARLESTON, SOUTH CAROLINA

CITIZEN PARTICIPATION PLAN

INTRODUCTION

The Citizen Participation Plan (CPP) has been prepared and implemented pursuant to federal regulations (U. S. Department of Housing and Urban Development (HUD) Regulations 24 CFR Part 91.105) and Charleston County's desire to encourage and support public participation in the development of the documents related to the consolidated planning process.

The purpose of the CPP is to establish a viable means by which residents of the Charleston County, public agencies, and other interested parties can actively participate in the development of documents related to the consolidated planning process including:

- The Consolidated Plan
- The Annual Action Plan
- Amendments to Consolidated Plan or Annual Action Plan(s)
- The Consolidated Annual Performance and Evaluation Report (CAPER)
- Amendments to the CPP

The actions described in the CPP relate to the planning and expenditure of funds provided to the County by the HUD Office of Community Planning and Development (CPD). CPD entitlement funds received by the County include the Community Development Block Grant (CDBG), HOME Investment Partnerships Program (HOME), and Emergency Solutions Grant (ESG).

ENCOURAGING PUBLIC PARTICIPATION [24 CFR 91.105(a)(2)]

Citizens are encouraged to participate in all phases of the CDBG, HOME and ESG programs and will be provided full access to program information. However, the final responsibility and authority for the development and implementation of the program will rest with Charleston County.

It is the County's desire to encourage all residents, especially those living in low and moderate income neighborhoods, and public and/or assisted housing, to participate in its planning process. Minorities, non-English speaking persons, as well as persons with disabilities are also encouraged to participate. Non-profit organizations, other government agencies, neighborhood groups, Continuums of Care, Public Housing authorities, and all other interested parties have an opportunity in the planning process as well.

The County will provide information to the Charleston County Housing and Redevelopment Authority (CCHRA) about the plan activities related to its developments and surrounding communities so that the CCHRA can make this information available at the annual public hearing(s) required for the PHA Plan.

The County will utilize traditional media for outreach to citizens and stakeholders including public hearings, publications in the newspaper(s) of general circulation, community meetings, and the County's website.

To reach the broadest audience, the County may also use internet-based approaches such as email, social media, and online surveys, as well as stakeholder meetings and interviews, focus groups, or other methods that encourage citizen participation during the development and implementation process for the documents covered by this CPP.

CITIZEN COMMENT ON THE CITIZEN PARTICIPATION PLAN AND AMENDMENTS [24 CFR 91.105(a)(3-4)]

The County will amend the Citizen Participation Plan, as necessary, to ensure adequate involvement of the public in making decisions related to the development the consolidated plan, any substantial amendments to the consolidated plan, and the CAPER. Revisions to change contact information of to clarify processes already in the CPP will not be considered a substantive change and will not be publicized for comment.

This Citizen Participation Plan can be amended only after the public has been notified of the County's intent to modify it, and only after the public has had a reasonable chance to review and comment on proposed substantive changes. Or, during the regular consolidated planning process which provides for proper public noticing. The Citizen Participation Plan and any proposed substantial amendments to the CPP will be made available for public review for a period of 30 calendar days prior to adoption by the County. The plan will be provided in a format accessible to persons with disabilities, upon request. In addition, the plan can be translated upon request.

DEVELOPMENT OF THE CONSOLIDATED PLAN [24 CFR 91.105(b)]

The Consolidated Plan is the County's five-year comprehensive plan addressing housing, homelessness, and recommendations for eliminating homelessness and increasing minority homeownership, non-housing community development needs. The Consolidated Plan recommends creative approaches to housing, economic development, and quality of life—the U. S. Department of Housing and Urban Development's (HUD's) national objectives.

The Annual One-Year Action Plan is prepared annually and is an update to the Five-Year Consolidated Plan. This Plan describes the needs, resources, priorities and proposed activities to be undertaken over a one-year period.

The stages for the development of the Consolidated Plan and Annual Action Plan include:

- **Needs Assessment Stage:** The identification of housing and community development needs.
 - **Consolidated Plan:**

Develop community goals for Charleston County by publishing an online survey instrument and publicizing its availability for the community at-large as well as each Participating Jurisdiction (PJ) Councils.

The survey will be provided to Charleston County citizens and organizations via an online survey instrument that will have three distinct sections broken out into eligible activities for CDBG, HOME, and ESG. The survey will be emailed to the Department's mailing list of more than 500 non-profit agencies, churches, neighborhood groups and other interested parties. Furthermore, staff will work to have the survey disseminated through County social media and website. Lastly, paper copies of the survey will be available at the Community Development office for those who may not have internet access.

Complete baseline analyses whereby specific projects are ranked by order of expressed community need via both surveys as referenced above.

By utilizing the responses from both the Elected Officials and the community at-large, a ranking of community needs (based upon eligible activities) will be determined. These three sets of rankings (CDBG, HOME, and ESG) will then be published in a draft Consolidated Plan in order to gather specific feedback within each need area and to determine what level of performance (outcomes and outputs) should be associated within each funding area. An announcement of this analysis will be published online and in a local newspaper. Additionally, the entire draft Consolidated Plan will be available on the County's website as well as in the County Community Development office.

Stakeholder and Community Partners Meeting

After all survey results have been tabulated and the priorities of each funding stream have been established, County staff will conduct a meeting or focus group per funding program. For the Emergency Solutions Grant (ESG) program, staff will invite the regional Continuum of Care providers. Additionally, staff will have a separate HOME stakeholder meeting, where entities who regularly partner with the county for housing rehabilitation, down payment assistance, and/or affordable homeownership programs will be present to assist staff better refine the outcomes for the goals. Lastly, staff will invite community partners to join us at our Community Development Block Grant (CDBG) meeting, to establish feasible sub-goals and numerical indicators per sub-goal and goal.

- **Consolidated Plan and Annual Action Plan:**

Conduct Public Hearing in Participating Jurisdictions

The County will advertise and conduct a public hearing in each of the participating municipalities within the County's Urban Entitlement designation (as requested by the jurisdiction). The content of these meetings generally will be as follows:

- (a) Explain the Urban Entitlement program
- (b) Review the status of the County's Urban Entitlement program to date
- (c) Describe competitive nature of funding
- (d) Identify types of projects eligible/ineligible
- (e) Review the ranking of the goals
- (f) Explain timetable for Consolidated Plan and/or Annual Action Plan

The public hearing in participating municipalities will be conducted at a time and place convenient for area residents. The county will advertise the public hearings in a local newspaper and on the County website; each municipality will advertise the hearing in accordance with their respective procedures (local newspaper, website, posted agenda, etc.).

- **Plan Development Stage:** The preparation of a draft use of funds for the upcoming year, the range of activities that may be undertaken, and the estimated amount that will benefit persons of low- and moderate-income. This process may include the development of a proposed new five-year Strategic Plan depending on the cycle.

- **Consolidated Plan and Annual Action Plan:**

- **Hold County-wide Public hearing at Charleston Council Chambers**

Once the initial planning and hearing process is complete, a public hearing will be scheduled at Charleston Council chambers. The purpose of this hearing will be to present the draft Consolidated Plan and/or Annual Action Plan and projected activities for review and comment. The format of the county-wide public hearing generally will be as follows:

- (a) Present a draft plan whereby needs are expressed in terms of eligible activity areas for HUD funding.
- (b) Solicit written comments and suggestions from the public and/or Elected Officials for altering and establishing priorities for possible inclusion in the Consolidated Plan and/or Annual Action Plan.

The County-wide Public Hearing date and times will be announced fourteen (14) days prior to the hearing to ensure adequate notice and an opportunity for greater participation. All comments will be recorded and will be attached to the final plan.

If comments received from Charleston County Council, representatives of the Participating Jurisdictions, area non-profits, or the general public in attendance at the county-wide public hearing warrant a change to the proposed plan, the Community Development Director will determine if a second county-wide public hearing is necessary—based upon criteria such as, a substantial change (20% or more) in allocation priorities; in the deletion of an activity; or in the category of beneficiaries. If so, a second county-wide public hearing will be scheduled.

Public Comment: The County will advertise a 30-day public comment period the Consolidated Plan and Annual Action Plan.

A summary of these comments or views, and a summary of any comments or views not accepted and the reasons why, shall be attached to the consolidated plan.

Consolidated Plan Amendments [24 CFR 91.105(c)]

An Amendment to the Five-Year Consolidated Plan and/or the Annual Action Plan is required in order to make a substantial change to the purpose, scope, location or beneficiaries of an activity. There are several modifications that are deemed “substantial” in nature and are listed below:

- a. Any budgetary change(s) exceeding 20 percent of the grant award as listed in the Annual Action Plan for that year. A substantial change in the County's allocation priorities or a substantial change in the method of distribution of funds.
- b. Deletion of an activity described in the Annual Action Plan or Consolidated Plan and subsequent replacement with a different activity.*
- c. A change in the category of beneficiaries (such as change from senior citizen to youth in a public service program or facility renovation project).

- d. A major change in the location of a project (such as out of a neighborhood or target area), as opposed to a move within close proximity

*If the activity is deleted (but not replaced), then a substantial amendment will not take place. In other words, if funds are returned because the activity never proceeded (and no funds were spent), then those returned funds will be included in the next grant cycle and corresponding Annual Action Plan.

*If the activity is deleted and replaced with a similar activity, then a substantial amendment will not take place. For example, an agency cannot do the HESG-funded rapid re-housing they proposed; if another agency is able to perform rapid re-housing with those same funds, then a substantial amendment will not take place. If the original rapid re-housing funds will be changed to another activity altogether (example: shelter operations), then a substantial amendment will take place.

Prior to amending the Consolidated Plan or Annual Action Plan, citizens will be provided with reasonable notice and the opportunity to comment on such change. The proposed amendment will be published in a newspaper of general circulation and citizen comments on the amendment will be solicited (the ad may only provide general information that includes a link where citizens can find out more information about the proposed amendment, hearing dates/times, and comment periods). A 30-day public comment period will be provided after publication of the substantial amendment before it is implemented (if HUD waives the normal 30-day comment period because of extraordinary circumstances like a natural disaster, pandemic, etc., details about the allowable comment period will be published on the Community Development website (www.charlestoncounty.org/departments/community-development/)).

The County will consider the comments or views of citizens received in writing or orally in preparing the substantial amendment to the Consolidated Plan or Annual Action Plan. A summary of the comments received from citizens, and, if applicable, an explanation of why recommendations received were not accepted will be attached to the final Consolidated Plan Amendment.

PERFORMANCE REPORTS [24 CFR 91.105(d)]

The Consolidated Annual Performance Evaluation Report (CAPER) is an evaluation tool or report card. This document is a progress report on how the County has administered its' CDBG, HOME, and ESG allocations. The CAPER compares the program year's accomplishments to the proposed activities stated in the annual Action Plan. The plan highlights the accomplishments, as well as conducts self-evaluation of internal programs and service delivery. It is also a critical part of the planning process.

The CAPER public hearing is scheduled 15 days or more before final submittal to HUD. This public hearing will be announced in a paper of general circulation and posted on the Charleston County Meeting agenda. All comments received at the hearing will be considered, as appropriate, and a summary will be attached to the CAPER when the final version is submitted.

PUBLIC HEARINGS [24 CFR 91.105(e)]

Specifics about public hearings are discussed throughout this plan as they relate to the Consolidated Plan, Annual Action Plan, Performance Reports, etc. Public hearings will be held at times and locations convenient to potential or actual beneficiaries and with accommodation for persons with disabilities. The hearings will generally be held at the Charleston County Public Administration Building. Accommodations for persons with visual, hearing or other impairments will be made upon request and reasonable notice. If a significant number of non-English speaking persons can be reasonably expected to attend the hearing, the County will make translation services available.

Hearings may be conducted at locations other than the County Council meeting chambers, to make them more convenient to residents, and hence increase the likelihood of citizen participation for those low-to-moderate income residents (LMI) where housing and community development funds may be spent. At least once per year, generally scheduled to coincide with each year's annual HUD allocation, a public hearing is held in each of the participating jurisdictions (as requested by the jurisdiction). Presently, these jurisdictions are as follows: Awendaw, Isle of Palms, Sullivan's Island, Hollywood, Meggett, Ravenel, Mount Pleasant, North Charleston, McClellanville and Lincolnton. Hearings are held in the evening to encourage greater public attendance.

If a public hearing is cancelled due to circumstances beyond the County's control (example: hurricane, pandemic, etc.), the hearing will be re-scheduled for the next available Council meeting. If unable to hold the meeting in-person, virtual meetings are also an option that can be used. Details about cancellations, rescheduling, or virtual meetings will be posted on the Community Development website (www.charlestoncounty.org/departments/community-development/).

MEETINGS [24 CFR 91.105(f)]

Charleston County will provide the public with reasonable and timely access to local meetings relating to the strategies and actions for affirmatively furthering fair housing and proposed or actual use of funds including the County Council meetings.

AVAILABILITY TO THE PUBLIC [24 CFR 91.105(g)]

Typical or standard documents available for public access, at a minimum, will include the proposed and final Annual Action Plans, the proposed and final Five-Year Strategic Plan (Consolidated Plan), proposed and final Substantial Amendments to an Annual Action Plan or the Five-Year Strategic Plan, Annual Performance Reports, and the Citizen Participation Plan. These documents will be available on the Community Development Department's website (www.charlestoncounty.org/departments/community-development/) and in-person at the following address:

Charleston County Community Development Department
Lonnie Hamilton III, Public Services Building
4045 Bridge View Drive – Suite C216
North Charleston, South Carolina 29405

ACCESS TO RECORDS [24 CFR 91.105(h)]

Charleston County will provide the public with reasonable and timely access to information and records relating to the data or content of the Consolidated Plan, as well as the proposed, actual, and past use of funds covered by this Citizen Participation Plan. The law requires reasonable public access to records about previous expenditures during the past five years, and reasonable public access to records relating to the expenditure of funds during the previous five (5) program years.

Accommodations for persons with visual, hearing or other impairments will be made upon request and reasonable notice. If a significant number of non-English speaking persons can be reasonably expected to review the documents, the County will make translated documents available.

TECHNICAL ASSISTANCE [24 CFR 91.105(i)]

Technical assistance will be available to all persons and groups representative of persons of low and moderate income that request such assistance in developing proposals for funding assistance under any of the programs covered by the Consolidated Plan. Technical assistance in developing a competitive grant proposal for funding is available, per request, after the award process is complete in order to assist said agencies in being better prepared for the next round of competition. Furthermore, the county holds a pre-application conference where all questions are answered and suggestions are offered. Lastly, after the 'Request for Applications' (RFA) has been released, citizens still have several weeks to submit technical assistance questions to the Community Development Department for response and eventually are published to the potential applicants.

COMPLAINTS [24 CFR 91.105(j)]

Complaints related to the Consolidated Plan, Annual Action Plans, Amendments and Performance Reports will be addressed promptly. Every written citizen complaint and grievance will be addressed, in writing, within 15 days where practicable. Complaints must be addressed to:

Jean Sullivan, Director
Charleston County Community Development Department
Lonnie Hamilton III, Public Services Building
4045 Bridge View Drive – Suite C216
North Charleston, South Carolina 29405

DISPLACEMENT [24 CFR 91.105(b)(1)(ii)]

The County does not anticipate the displacement of persons during the implementation of activities included in the Consolidated Plan or its subsequent Annual Action Plans. However, in the event a displacement occurs, the county will make available the types and levels of assistance contained in the HOME Program Operating and Procedures Manual as was required by the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended, and as required under section 104(d) of the Housing and Community Development Act of 1974, as amended. Also see 24 CFR 92.353 Subpart H. Copies of the the HOME Program Operating and Procedures Manual are available for examination at Charleston County Community Development Department, 4045 Bridge View Drive, North Charleston, South Carolina 29405-7464.

Date of Initial Adoption: March 18, 1997

Date of Amendment 1: March 17, 1998

Date of Amendment 2: April 29, 2005

Date of Amendment 3: April 22, 2006

Date of Amendment 4: May 15, 2011

Date of Amendment 5: September 1, 2012

Date of Amendment 6: March 24, 2016

Date of Amendment 7: May 23, 2018

Date of Amendment 8: March 26, 2020

Date of Amendment 9: April 23, 2020

Attachment 1: Summary of Activities for Reports

Plan/ Amendment	Five-Year Consolidated Plan	One-Year Annual Action Plan	Substantial Amendment(s)	CAPER
Schedule of activities	Online survey	County will advertise and conduct a public hearing in each of the participating municipalities (as requested), to include a discussion of community needs*	<p>The proposed amendment will be published in a newspaper of general circulation and citizen comments on the amendment will be solicited.</p> <p>A 30-day public comment period will be provided after publication of the substantial amendment before it is implemented.^</p>	<p>Notice of the availability of the performance report will be published in a newspaper of general circulation and citizen comments on the performance report will be solicited. A 15-day public comment period will be provided before the performance report is submitted to HUD.</p>
	Publish ranking of community needs (based on survey results)	County-wide Public hearing at Charleston Council Chambers. Hearing dates and times will be announced 14 days prior to the hearings.*		<p>The CAPER public hearing is scheduled 15 days or more before final submittal to HUD. This public hearing will be announced in a paper of general circulation.*</p>
	County staff conduct a focus group per funding program	A 30-day public comment period on the Action Plan will begin after the County-wide hearing. The Plan is submitted to HUD by May 15th of each year.		
	County will advertise and conduct a public hearing in each of the participating municipalities (as requested)*			
	County-wide Public hearing at Charleston Council Chambers. Hearing dates and times will be announced 14 days prior to the hearings. A 30-day public comment period will begin after the hearings.*			

*See page 4 for public hearing/meeting contingencies

^See pages 3-4 for contingencies for substantial amendments