



BOARD OF SUPERVISORS AGENDA ITEM REPORT

Requested Board Meeting Date: May 5, 2020

Pima County Resolution to Approve Submission of the Pima County Consortium FY 2020-2024 HUD
Title: Consolidated Plan; Pima County 2020-2021 Annual Action Plan; and the Analysis of Impediments to Fair Housing Choice to the U.S. Department of Housing and Urban Development.

Introduction/Background:

Every five years Pima County conducts three planning processes to secure US Department of Housing and Urban Development (HUD) funding. This resolution will approve the following plans, annual recommendations, and applicable certifications for submittal to HUD: *City of Tucson and Pima County Consortium 2020-2024 HUD Consolidated Plan*; *FY2020-2021 Pima County Annual Action Plan*, recommendations and certifications; and *Analysis of Impediments to Fair Housing Choice*. Executive summaries are attached with this agenda item with full draft versions available online at: <http://webcms.pima.gov/cms/one.aspx?portalId=169&pageId=12301>

Discussion:

The purpose of the "Consolidated Plan" is to identify community and affordable housing needs for the next five years that could be addressed by investing and leveraging future federal HUD funds. For Pima County the federal funds covered by the Consolidated Plan include the following programs: Community Development Block Grant (CDBG), HOME Investment Partnerships (HOME), and Emergency Solutions Grant (ESG). The *FY2020-2021 Pima County Annual Action Plan* is the first action plan of the five year, 2020-2024, Consolidated Plan. The *FY2020-2021 Pima County Annual Action Plan* lists the eligible programs and projects recommended for funding under the CDBG and ESG programs. Pima County received 98 applications totaling \$7,354,567 in requests for FY 2020-2021 CDBG and ESG programs. The *Analysis of Impediments to Fair Housing Choice* is a HUD requirement to receive CDBG and to comply with US Fair Housing Act legislation. The purpose of the document is to identify and analyze impediments to fair and equal housing opportunities and develop a Plan of Action to address these impediments to housing choice.

Conclusion:

Failure to approve these plans for submittal to HUD will jeopardize the next five years of funding to Pima County for affordable housing, homelessness, Fair Housing, and community development programs and projects that directly benefit low to moderate income individuals.

Recommendation:

Staff recommends Board approval of the *City of Tucson and Pima County Consortium 2020-2024 HUD Consolidated Plan*; *FY2020-2021 Pima County Annual Action Plan*, recommendations and certifications; and *Analysis of Impediments to Fair Housing Choice*. CDNC shall be directed to submit the Board approved *City of Tucson and Pima County Consortium 2020-2024 HUD Consolidated Plan*; *FY2020-2021 Pima County Annual Action Plan*, recommendations and certifications; and *Analysis of Impediments to Fair Housing Choice* to HUD. The Chairman of the Board of Supervisors ("Chairman") shall be authorized to execute all necessary HUD agreements and other certifying documents pertaining to CDBG, ESG and HOME projects and activities identified in the plan. Finally, Chairman shall be authorized to execute all subrecipient agreements between agencies and the County for respective CDBG, ESG, and HOME funded projects and activities identified in the FY 2020-2021 Pima County Annual Action Plan.

Fiscal Impact:

Once approved, \$4,262,472 for FY 2020-2021 and an estimated \$21,000,000 over the next 5 years, in federal investment will be made available for eligible projects and activities that provide direct community and public benefit for Pima County residents. Typically the HUD CDBG, ESG and HOME funds are directly leveraged 2 to 1 by other local, state and federal resources.

**Pima County Resolution to Approve Submission of the Pima County Consortium FY 2020-2024 HUD Consolidated Plan;
Pima County 2020-2021 Annual Action Plan; and the Analysis of Impediments to Fair Housing Choice to the U.S.
Department of Housing and Urban Development.**

May 5, 2020

Page 2

Board of Supervisor District:

☐ 1

☐ 2

☐ 3

☐ 4

☐ 5

☒

All

Department Director Signature/Date:

Daniel Gynta 4.17.2020

Deputy County Administrator Signature/Date:

[Signature] 30 Apr 2020

County Administrator Signature/Date:

C. Bullock 4/29/20

RESOLUTION 2020 - ____

RESOLUTION OF THE BOARD OF SUPERVISORS OF PIMA COUNTY TO APPROVE SUBMISSION OF THE CITY OF TUCSON AND PIMA COUNTY CONSORTIUM FY 2020-2024 HUD CONSOLIDATED PLAN, PIMA COUNTY 2020-2021 ANNUAL ACTION PLAN AND THE ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING CHOICE TO THE U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT

The Board of Supervisors of Pima County, Arizona finds:

1. Pima County ("County"), through its Department of Community Development and Neighborhood Conservation ("CDNC"), administers several federal and local grant programs to benefit low-income, homeless, and certain special needs individuals in Pima County.
2. County is the recipient of U.S. Department of Housing and Urban Development ("HUD") grant funds under: Title I of the Housing and Community Development Act of 1974, Public Law 93-383, as amended; Title II of the Cranston-Gonzalez National Affordable Housing Act ("NAHA"); and, Title IV of the McKinney-Vento Homeless Assistance Act (collectively referred to as "the HUD Grants").
3. HUD has granted Pima County federal funds for fiscal year (FY) 2020-2021 from the following grant programs:

Community Development Block Grant ("CDBG")	\$ 2,971,606.00
HOME Investment Partnerships ("HOME")	\$ 1,044,469.00*
Emergency Solutions Grant ("ESG")	\$ 246,397.00

**Amount County will receive from the federal allocation to the City of Tucson*

4. In order to use these funds, the County must prepare and submit to HUD the following documents:
 - a. A five-year consolidated plan ("City of Tucson and Pima County Consortium FY2020-2024 HUD Consolidated Plan");
 - b. An annual community development and housing funding allocation plan ("Annual Action Plan");
 - c. A Fair Housing Plan ("Analysis of Impediments to Fair Housing Choice")
5. The City of Tucson and Pima County Consortium FY2020-2024 HUD Consolidated Plan describes the framework for implementation of the City and County missions and goals utilizing HUD funding. This plan is designed to guide HUD funded housing, homeless and community development policies and programs during the five-year period beginning July 1, 2020 and ending June 30, 2024. This plan also includes a comprehensive overview of federal, state and local programs that address identified needs that can be met with the use of the grant funds.

6. The Annual Action Plan describes allocations and activities that address community needs in Pima County and explains the proposed projects under CDBG, HOME, and ESG for FY 2020-2021.
7. The Analysis of Impediments to Fair Housing Choice is designed to affirmatively further fair housing and to carry out the full intent of federal fair housing legislation. This Analysis sets forth measureable actions to be taken to overcome the effects of impediments to housing choice.

NOW, THEREFORE, BE IT RESOLVED, that:

- A. The Annual Action Plan is approved for FY 2020-2021 funding for:
 1. The 2020-2021 CDBG Program;
 2. The 2020-2021 HOME Program, and
 3. The 2020-2021 ESG Program.
- B. CDNC staff is authorized to submit to HUD;
 1. The City of Tucson and Pima County Consortium FY2020-2024 HUD Consolidated Plan;
 2. The Annual Action Plan for FY 2020-2021; and
 3. The Analysis to Impediments to Fair Housing Choice.
- C. The Chairman of the Board of Supervisors ("Chairman") is authorized to execute all necessary HUD agreements and other documents to obtain HUD funding for the CDBG, HOME and ESG projects designated in the Annual Action Plan for FY 2020-2021. When required by HUD, the Chairman may direct CDNC staff to enter the acceptance of the HUD funding electronically.
- D. CDNC staff is directed to prepare CDBG, HOME and ESG agreements for distribution of the grant funds with agencies authorized by HUD through its approval and funding of the FY 2020-2021 Annual Action Plan.
- E. The Chairman is authorized to execute all agreements between Pima County and the agencies to carry out the CDBG, HOME and ESG projects set forth in the FY 2020-2021 Annual Action Plan approved by HUD.

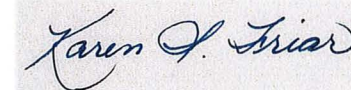
Passed and adopted, this _____ day of _____, 2020.

Chairman, Pima County Board of Supervisors

ATTEST:

Clerk of the Board

APPROVED AS TO FORM



Karen S. Friar, Deputy County Attorney

PIMA COUNTY 5-YEAR HUD CONSOLIDATED PLAN EXECUTIVE SUMMARY

Introduction

The Consolidated Plan is required every five years by the U.S. Department of Housing and Urban Development (HUD) for jurisdictions that receive a direct allocation of HUD formula funds from the HUD Office of Community Planning and Development (CPD). CPD formula funds received by the City of Tucson Housing and Community Development Department (HCD) include the Community Development Block Grant program (CDBG), HOME Investment Partnerships Program (HOME), Housing Opportunities for Persons with AIDS (HOPWA) program, and Emergency Solutions Grant (ESG) program.

The primary purpose of HUD CPD programs is to develop viable communities by promoting integrated approaches that provide decent housing, a suitable living environment and expanded economic opportunities for low-and-moderate income people, households and neighborhoods. The Consolidated Plan focuses resources on low-and-moderate-income (LMI) households at various income levels including: 1) extremely low-income households that have income at or below 30% of the area median income (AMI); 2) very low-income households that have income 31%-50% of AMI; and 3) low-and moderate-income households that have income 51-80% of AMI.

The City of Tucson and Pima County Consortium are jointly responsible for developing the Consolidated Plan. This Consolidated Plan determines priorities, establishes strategic goals, and allocates resources for the HUD CPD programs administered by Pima County for the 5-year period beginning July 1, 2020 and ending June 30, 2024.

Pima County's central long-term community development goal is to build healthy communities, focusing resources on community needs, particularly the needs of low and moderate income and other vulnerable residents. The core organizing principle of Pima Prospers (Pima County's Comprehensive Plan) and of the Consolidated Plan is the creation and maintenance of healthy communities.

Pima County is a series of communities and the principle of healthy communities means that communities provide opportunities for people to thrive - economic growth, social vitality, environmental responsibility, access to healthy food, and to the extent possible access to transportation and housing choices. Pima County recognizes the necessity of acknowledging the different lifestyles of rural, suburban and urban communities, with a focus on the provision of services and intergovernmental and public-private-nonprofit partnerships.

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

HUD resources must generally be used to benefit low and moderate-income (LMI) households and neighborhoods. A needs assessment and market analysis are conducted for the Consolidated Plan. The needs assessment and market analysis examine conditions and trends in housing, homelessness, community development and vulnerable (special needs) populations. The needs assessment and market analysis are combined with input from residents and stakeholders to define priorities, goals and objectives.

To address infrastructure, facility, housing and services needs using HUD Consolidated Plan resources, Pima County established goals and objectives to address needs in six categories:

1. Community Facilities and Improvements.
2. Public Services.
3. Decent Affordable Housing
4. Homelessness.
5. Economic Development.
6. Program Administration.

In many cases, federal, state and local resources leverage HUD funding.

Evaluation of past performance

Pima County's most recent Consolidated Annual Performance Report (four of five plan years completed) demonstrates the County made progress towards 1) providing or improving community facilities and infrastructure, 2) supporting housing and providing services for people with HIV/AIDS, 2) outreaching to and providing services, shelter beds, transitional housing, permanent housing and rapid re-housing for people experiencing homelessness, 3) providing public services for LMI people, 4) demolishing unsafe vacant structures, 5) rehabilitating owner-occupied housing units, 6) preventing homelessness, and 7) developing or rehabilitating rental housing.

Summary of citizen participation process and consultation process

Pima County and the City of Tucson jointly held nine (9) Consolidated Plan Forums, conducted follow-up meetings with stakeholders, conducted resident and stakeholder surveys, conducted a public meeting to review the Consolidated Plan prior to the public comment period, and held public hearings.

Consolidated Plan forums were held over a three-day period, including an evening meeting focused on neighborhood sustainability; 110 individuals attended the forums. The follow-up meetings with stakeholders focused on homelessness and regulatory barriers to further refine priorities.

Online surveys were conducted to identify resident and stakeholder priorities and solicit input into needs and priorities. The surveys were marketed through radio and online media and to the City and County email lists.

Flyers with a QR code were posted in public places, including community centers and bus shelters to further encourage participation. The survey was available in both English and Spanish from July 18, 2019 to September 19, 2019; 798 valid survey responses were received.

Both the City of Tucson and Pima County held public hearings with their respective governing bodies. The draft 5-year Consolidated Plan and Annual Action Plan were made available to the public for a thirty-day public comment period beginning March 20, 2020 and ending April 21, 2020. Public hearing notices and a summary of the 5-year Consolidated Plan and Annual Action Plan were posted on the City and County websites and advertised in a newspaper of general circulation 15 days prior to the meetings. Notices were also sent by email to the City and County email list.

Summary of public comments

A full spectrum of needs and priorities were discussed in the public forums and meetings and identified through the surveys, including: affordable housing, homelessness, special needs populations, infrastructure, community facilities, economic development, public services, and program delivery.

Prevalent affordable housing comments included: the rising cost of housing, particularly the need for affordable rental housing for extremely-low income households, vulnerable populations, seniors, and families; owner housing rehabilitation; disability-accessibility improvements; first-time homebuyer assistance; the need to develop living wage employment opportunities so households can afford housing; and working with landlords and property managers to house vulnerable populations.

Prevalent homelessness comments included: the need for emergency shelter (particularly low-barrier), site-based transitional housing, supportive services, permanent supportive housing, and homelessness prevention; the growing population of seniors experiencing homelessness and challenges housing them through the Coordinated Entry model; increasing numbers of people experiencing chronic homelessness; the limited supply of rental housing affordable to extremely-low income households; challenges with documentation, and credit and income requirements necessary to secure rental housing; and limited administrative funding and case manager burnout.

Among special needs populations, the housing and services needs of youth, people with disabilities, seniors, people with health and mental health conditions, and low-income families with children were the most prevalent discussions.

The most prevalent comments regarding facilities and infrastructure included: dental, health and mental health services and facilities; public safety facilities; transportation and transit systems, including streets and sidewalks; broadband infrastructure; childcare centers; libraries and other community facilities; and community/neighborhood clean-up.

Prevalent comments regarding public services included: services for unsheltered people experiencing homelessness; child care services; employment, job training and job search/placement services; fair housing services, financial education and counseling; small business/microbusiness assistance; and the need to link transportation, child care and essential services.

Program delivery discussions focused on: establishing data collection and numeric goals; community and neighborhood planning and leadership development; need to address local regulatory barriers and create incentives to encourage affordable housing development; HUD program regulatory barriers and the capacity necessary to manage multiple HUD CPD resources with often-conflicting regulatory requirements; and developing intentional collaboration, coordination and partnerships, including systems of support and capacity building for rural areas, relationships with the private sector, and cross-collaboration with health care providers.

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

All comments relevant to the Consolidated Plan were accepted.

Summary

Priorities identified through the survey, forums and meetings were incorporated into goal setting. Consultation and citizen participation comments are collated with analyzed data to identify priorities. Given the extensive volume of input and limited HUD and local resources, the City and County have identified those actions that it can take with available resources.

City of Tucson and Pima County Analysis of Impediments to Fair Housing Choice (AI)

The Analysis of Impediments to Fair Housing Choice (AI) is part of the City of Tucson's and Pima County's requirement to Affirmatively further Fair Housing (AFH) and receive Community Development Block Grant (CDBG) funding from the US Department of Housing and Urban Development (HUD). The AI is completed every five years in coordination with the Consolidated Planning process.

The results of the AI are used to develop a Fair Housing Action Plan with measurable actions to overcome the effects of any identified impediments. The City and County must then implement the action plan and maintain records of the actions they have taken.

The City of Tucson and Pima County worked collaboratively to complete this AI as a regional effort through a contract with Kuehl Enterprises LLC working in cooperation with the Southwest Fair Housing Council. This AI:

1. Analyzes the current state of fair housing;
2. Identifies both new and ongoing impediments to fair housing;
3. Evaluates the efficacy of the 2014 Fair Housing Action Plan; and
4. Develops a new Action Plan to address the identified impediments.

In July 2015, HUD published an Assessment of Fair Housing (AFH) regulation with the intent to better equip local governments with the data and tools to help them meet their obligation to affirmatively further fair housing in their use of HUD funds. In May 2018, HUD suspended the requirement to complete an AFH pending review of the tools. As a result of the AFH suspension, this AI follows HUD's Fair Housing Planning Guidance. Should HUD lift the suspension on the AFH tool, future assessments will follow the new guidelines.

The City of Tucson - Pima County Consortium contracted with Kuehl Enterprises LLC to develop this AI. The methodology used to complete the AI included focus groups, a public and stakeholder survey, interviews, and the collection and analysis of data and information from numerous sources including the US Census, the Consumer Financial Protection Bureau and other public and private agencies including the Southwest Fair Housing Council, the City of Tucson, and Pima County.

Pima County/City of Tucson Fair Housing Goals

The City of Tucson and Pima County (Consortium) goals in developing this AI and implementing its Action Plan include to:

- The City of Tucson and Pima County (Consortium) goals in developing this AI and implementing its Action Plan include to:
 - Eliminate all forms of illegal housing discrimination in Pima County.
 - Actively promote fair housing choice for all persons in Pima County.
- Provide opportunities in all areas of Pima County for inclusive patterns of housing occupancy regardless of race, color, religion, sex, familial status, disability, and national origin.
- Actively promote housing that is structurally accessible to, and usable by, all persons, particularly persons with disabilities in Pima County.

- Foster compliance with the nondiscrimination provisions of the Fair Housing Act in all areas of Pima County.
- Maintain a firm and continued commitment to the analysis, planning, and implementation necessary to achieve fair housing goals.
- Educate the public on fair housing issues.
- Guarantee oversight by the City of Tucson Mayor and Council and the Pima County Board of Supervisors to ensure an ongoing fair housing program.
- Create a comprehensive Analysis of Impediments to Fair Housing Choice (AI) document, and devise a carefully structured

plan for addressing impediments that is firmly grounded in the AI's conclusions.

- Take effective actions based on a realistic assessment of available resources.
- Identify and track measurable results in meeting local fair housing goals.
- Increase cooperation between public and private agencies in promoting public awareness of fair housing issues.
- Effectively enforce fair housing laws.
- Increase community awareness and promote equal housing opportunity and fair housing choices in the community.

2020 Impediments to Fair Housing Choice

The 2020 Analysis of Impediments to Fair Housing Choice identified seven (7) impediments:

1. **Housing Discrimination.** A community survey, interviews with industry stakeholders, focus groups, and fair housing testing and complaint data indicate housing discrimination occurs. Support and awareness will aid in identifying and addressing housing discrimination.
2. **Community Education and Awareness.** A community survey, interviews with industry stakeholders, focus groups, and fair housing testing and complaint data indicate there is a need for more outreach and education. Continued and expanded education efforts will increase understanding of fair housing and the likelihood of it being reported.
3. **Geographic Concentrations.** Concentrations of minority and poverty households persist. Socio-economic and housing market conditions impact minority and low-income population access to housing choice and opportunity. Program and project policies have the potential to expand housing choice and access to opportunity, and to alleviate segregated housing patterns.
4. **Lending Discrimination.** Minority loan applicants, and loan applicants in minority-concentration areas experience a disproportionately high rate of denial. Minority loan applicants and loan applicants in minority-concentration areas are also more likely to receive high-cost loans. Education targeted to minority and low-income borrowers, and loan applicants in minority- and low-income concentration areas will increase understanding of the credit market.
5. **Disability Accessibility.** The majority of fair housing complaints reported by Southwest Fair Housing Council and the United States Department of Housing and Urban Development were regarding disability; frequently related to reasonable accommodation. Increased support and awareness may identify and address housing discrimination, including that directed towards accessibility for persons with disabilities.

6. Fair Housing Monitoring and Reporting. Information that comprehensively describes City and County actions to address fair housing impediments is difficult to find. Public information about the nature of complaints and actions to address housing discrimination will support community education and further focus activities to affirmatively further fair housing.

7. Enforcement of the City of Tucson Fair Housing Ordinance. Testing revealed a cumbersome process and lack of knowledge of the ordinance, who to contact to file a complaint, and how to identify housing discrimination. Transparency and public information will increase awareness of the City's fair housing ordinance.

CERTIFICATIONS

In accordance with the applicable statutes and the regulations governing the consolidated plan regulations, the jurisdiction certifies that:

Affirmatively Further Fair Housing --The jurisdiction will affirmatively further fair housing.

Uniform Relocation Act and Anti-displacement and Relocation Plan -- It will comply with the acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended, (42 U.S.C. 4601-4655) and implementing regulations at 49 CFR Part 24. It has in effect and is following a residential anti-displacement and relocation assistance plan required under 24 CFR Part 42 in connection with any activity assisted with funding under the Community Development Block Grant or HOME programs.

Anti-Lobbying --To the best of the jurisdiction's knowledge and belief:

1. No Federal appropriated funds have been paid or will be paid, by or on behalf of it, to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with the awarding of any Federal contract, the making of any Federal grant, the making of any Federal loan, the entering into of any cooperative agreement, and the extension, continuation, renewal, amendment, or modification of any Federal contract, grant, loan, or cooperative agreement;
2. If any funds other than Federal appropriated funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this Federal contract, grant, loan, or cooperative agreement, it will complete and submit Standard Form-LLL, "Disclosure Form to Report Lobbying," in accordance with its instructions; and
3. It will require that the language of paragraph 1 and 2 of this anti-lobbying certification be included in the award documents for all subawards at all tiers (including subcontracts, subgrants, and contracts under grants, loans, and cooperative agreements) and that all subrecipients shall certify and disclose accordingly.

Authority of Jurisdiction --The consolidated plan is authorized under State and local law (as applicable) and the jurisdiction possesses the legal authority to carry out the programs for which it is seeking funding, in accordance with applicable HUD regulations.

Consistency with plan --The housing activities to be undertaken with Community Development Block Grant, HOME, Emergency Solutions Grant, and Housing Opportunities for Persons With AIDS funds are consistent with the strategic plan in the jurisdiction's consolidated plan.

Section 3 -- It will comply with section 3 of the Housing and Urban Development Act of 1968 (12 U.S.C. 1701u) and implementing regulations at 24 CFR Part 135.

Signature of Authorized Official

Date

Chairman, Board of Supervisors
Title

Specific Community Development Block Grant Certifications

The Entitlement Community certifies that:

Citizen Participation -- It is in full compliance and following a detailed citizen participation plan that satisfies the requirements of 24 CFR 91.105.

Community Development Plan -- Its consolidated plan identifies community development and housing needs and specifies both short-term and long-term community development objectives that have been developed in accordance with the primary objective of the CDBG program (i.e., the development of viable urban communities, by providing decent housing and expanding economic opportunities, primarily for persons of low and moderate income) and requirements of 24 CFR Parts 91 and 570.

Following a Plan -- It is following a current consolidated plan that has been approved by HUD.

Use of Funds -- It has complied with the following criteria:

1. Maximum Feasible Priority. With respect to activities expected to be assisted with CDBG funds, it has developed its Action Plan so as to give maximum feasible priority to activities which benefit low- and moderate-income families or aid in the prevention or elimination of slums or blight. The Action Plan may also include CDBG-assisted activities which the grantee certifies are designed to meet other community development needs having particular urgency because existing conditions pose a serious and immediate threat to the health or welfare of the community, and other financial resources are not available (see Optional CDBG Certification).

2. Overall Benefit. The aggregate use of CDBG funds, including Section 108 guaranteed loans, during program year(s) 2019-2020 [a period specified by the grantee of one, two, or three specific consecutive program years], shall principally benefit persons of low and moderate income in a manner that ensures that at least 70 percent of the amount is expended for activities that benefit such persons during the designated period.

3. Special Assessments. It will not attempt to recover any capital costs of public improvements assisted with CDBG funds, including Section 108 loan guaranteed funds, by assessing any amount against properties owned and occupied by persons of low and moderate income, including any fee charged or assessment made as a condition of obtaining access to such public improvements.

However, if CDBG funds are used to pay the proportion of a fee or assessment that relates to the capital costs of public improvements (assisted in part with CDBG funds) financed from other revenue sources, an assessment or charge may be made against the property with respect to the public improvements financed by a source other than CDBG funds.

In addition, in the case of properties owned and occupied by moderate-income (not low-income) families, an assessment or charge may be made against the property for public improvements financed by a source other than CDBG funds if the jurisdiction certifies that it lacks CDBG funds to cover the assessment.

Excessive Force -- It has adopted and is enforcing:

1. A policy prohibiting the use of excessive force by law enforcement agencies within its jurisdiction against any individuals engaged in non-violent civil rights demonstrations; and
2. A policy of enforcing applicable State and local laws against physically barring entrance to or exit from a facility or location which is the subject of such non-violent civil rights demonstrations within its jurisdiction.

Compliance with Anti-discrimination laws -- The grant will be conducted and administered in conformity with title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000d) and the Fair Housing Act (42 U.S.C. 3601-3619) and implementing regulations.

Lead-Based Paint -- Its activities concerning lead-based paint will comply with the requirements of 24 CFR Part 35, Subparts A, B, J, K and R.

Compliance with Laws -- It will comply with applicable laws.

Signature of Authorized Official

Date

Chairman, Board of Supervisors
Title

OPTIONAL Community Development Block Grant Certification

Submit the following certification only when one or more of the activities in the action plan are designed to meet other community development needs having particular urgency as specified in 24 CFR 570.208(c):

The grantee hereby certifies that the Annual Plan includes one or more specifically identified CDBG-assisted activities which are designed to meet other community development needs having particular urgency because existing conditions pose a serious and immediate threat to the health or welfare of the community and other financial resources are not available to meet such needs.

N/A

Signature of Authorized Official

Date

Title

Specific HOME Certifications

The HOME participating jurisdiction certifies that:

Tenant Based Rental Assistance -- If it plans to provide tenant-based rental assistance, the tenant-based rental assistance is an essential element of its consolidated plan.

Eligible Activities and Costs -- It is using and will use HOME funds for eligible activities and costs, as described in 24 CFR §§92.205 through 92.209 and that it is not using and will not use HOME funds for prohibited activities, as described in §92.214.

Subsidy layering -- Before committing any funds to a project, it will evaluate the project in accordance with the guidelines that it adopts for this purpose and will not invest any more HOME funds in combination with other Federal assistance than is necessary to provide affordable housing;

Signature of Authorized Official

Date

Chairman, Board of Supervisors
Title

Emergency Solutions Grants Certifications

The Emergency Solutions Grants Program recipient certifies that:

Major rehabilitation/conversion/renovation – If an emergency shelter's rehabilitation costs exceed 75 percent of the value of the building before rehabilitation, the recipient will maintain the building as a shelter for homeless individuals and families for a minimum of 10 years after the date the building is first occupied by a homeless individual or family after the completed rehabilitation.

If the cost to convert a building into an emergency shelter exceeds 75 percent of the value of the building after conversion, the recipient will maintain the building as a shelter for homeless individuals and families for a minimum of 10 years after the date the building is first occupied by a homeless individual or family after the completed conversion.

In all other cases where ESG funds are used for renovation, the recipient will maintain the building as a shelter for homeless individuals and families for a minimum of 3 years after the date the building is first occupied by a homeless individual or family after the completed renovation.

Essential Services and Operating Costs – In the case of assistance involving shelter operations or essential services related to street outreach or emergency shelter, the recipient will provide services or shelter to homeless individuals and families for the period during which the ESG assistance is provided, without regard to a particular site or structure, so long the recipient serves the same type of persons (e.g., families with children, unaccompanied youth, disabled individuals, or victims of domestic violence) or persons in the same geographic area.

Renovation – Any renovation carried out with ESG assistance shall be sufficient to ensure that the building involved is safe and sanitary.

Supportive Services – The recipient will assist homeless individuals in obtaining permanent housing, appropriate supportive services (including medical and mental health treatment, victim services, counseling, supervision, and other services essential for achieving independent living), and other Federal, State, local, and private assistance available for these individuals.

Matching Funds – The recipient will obtain matching amounts required under 24 CFR 576.201.

Confidentiality – The recipient has established and is implementing procedures to ensure the confidentiality of records pertaining to any individual provided family violence prevention or treatment services under any project assisted under the ESG program, including protection against the release of the address or location of any family violence shelter project, except with the written authorization of the person responsible for the operation of that shelter.

Homeless Persons Involvement – To the maximum extent practicable, the recipient will involve, through employment, volunteer services, or otherwise, homeless individuals and families in constructing, renovating, maintaining, and operating facilities assisted under the ESG program, in providing services assisted under the ESG program, and in providing services for occupants of facilities assisted under the program.

Consolidated Plan – All activities the recipient undertakes with assistance under ESG are consistent with its consolidated plan.

Discharge Policy – The recipient will establish and implement, to the maximum extent practicable and where appropriate, policies and protocols for the discharge of persons from publicly funded institutions or systems of care (such as health care facilities, mental health facilities, foster care or other youth facilities, or correction programs and institutions) in order to prevent this discharge from immediately resulting in homelessness for these persons.

Signature of Authorized Official

Date

Chairman, Board of Supervisors
Title

Housing Opportunities for Persons With AIDS Certifications

The HOPWA grantee certifies that:

Activities -- Activities funded under the program will meet urgent needs that are not being met by available public and private sources.

Building -- Any building or structure assisted under that program shall be operated for the purpose specified in the consolidated plan:

1. For a period of not less than 10 years in the case of assistance involving new construction, substantial rehabilitation, or acquisition of a facility,
2. For a period of not less than 3 years in the case of assistance involving non-substantial rehabilitation or repair of a building or structure.

N/A

Signature of Authorized Official

Date

Title

APPENDIX TO CERTIFICATIONS

INSTRUCTIONS CONCERNING LOBBYING CERTIFICATION:

Lobbying Certification

This certification is a material representation of fact upon which reliance was placed when this transaction was made or entered into. Submission of this certification is a prerequisite for making or entering into this transaction imposed by section 1352, title 31, U.S. Code. Any person who fails to file the required certification shall be subject to a civil penalty of not less than \$10,000 and not more than \$100,000 for each such failure.

FY 2020/2021 Pima County Community Development Block Grant (CDBG) Program

Location/Applicant	Program	Activity	District	20-21 Request	Recommendation
Ajo Center for Sustainable Agriculture	Seeds of Future	ps	3	\$ 38,000	\$28,000
Ajo Community Health Center; d.b.a. Desert Senita Community Health Center	Dental Infrastructure Improvement Project	pf	3	\$ 84,504	\$0
Ajo/Gibson Fire Volunteer Fire Dept	SCBA Replacement	pf	3	\$ 95,305	\$0
Ajo - International Sonoran Desert Alliance	Ajo Builds	hsg	3	\$ 40,000	\$40,000
Ajo - International Sonoran Desert Alliance	Ajo Plaza Life Safety Improvements	cf	3	\$ 56,000	\$56,000
Ajo - International Sonoran Desert Alliance	Ajo Works	ps	3	\$ 25,000	\$20,000
Portable Practical Educational Preparation, Inc.	Amado Teen Project	ps	3	\$ 30,000	\$30,000
Portable Practical Educational Preparation, Inc.	Amado Youth Center	pf	3	\$ 125,000	\$125,000
Arivaca Community Center	Arivaca Community Center Park and Surrounding Outdoor Facilities	pf	3	\$ 30,000	\$0
Arivaca Coordinating Council/Arivaca Human Resources	Storage Facility	pf	3	\$ 56,150	\$0
Arivaca Fire District	Structure Fire Gear	pf	3	\$ 63,000	\$0
Arivaca Fire District Auxiliary	Type 6 Brush Truck	pf	3	\$ 85,000	\$0
Arivaca Helping Hearts, Inc.	Arivaca Helping Hearts Improvements	pf	3	\$ 130,169	\$0
Arivaca Townsite Water Co.	Building Phase 2	pf	3	\$ 30,000	\$30,000
Avra Water Co-op, Inc.	Aging Meter Replacement Program/MXU Install Program	pf	3	\$ 35,000	\$15,000
Avra Water Co-op, Inc.	Pipeline Replacement Program	pf	3	\$ 31,833	\$0
Drexel Heights Fire District	Family Safety Program	ps	3 & 5	\$ 15,000	\$11,560
Drexel Heights Fire District	Thermal Imaging Cameras	pf	3 & 5	\$ 30,000	\$0
Flowing Wells Continental Little League	Flowing Wells Continental Little League & Pima County NRPR Curtis Park Snack Bar & Storage	pf	1 & 3	\$ 30,000	\$30,000
Flowing Wells Neighborhood Association and Community Coalition	Operating Funds and Technical Assistance	ps	1 & 3	\$ 15,000	\$0
Flowing Wells Neighborhood Association and Community Coalition	Speed Calming Measures for Royal Palm	pf	1	\$ 15,000	\$15,000
Flowing Wells - Amistades, Inc.	Leaders In Action, Ellie Towne Teen Program	ps	3	\$ 150,000	\$15,000
Flowing Wells School District	Flowing Wells Family Resource Center	ps	1 & 3	\$ 58,000	\$37,000
Altar Valley School District	Altar Valley Resource Program Coordinator	ps	3	\$ 44,000	\$22,000
Friends of Robles Ranch	Site Manager- My Friends Closet Program	ps	3	\$ 15,000	\$0
Three Points Fire District	Heavy Duty 4x4 Chassis	pf	3	\$ 45,000	\$0
Three Points Fire District	Thermal Imaging Cameras	pf	3	\$ 26,000	\$10,000
Green Valley Assistance Services dba Valley Assistance Services	SHiM Safety and Health in Motion Fall Prevention	ps	2 & 4	\$ 16,000	\$0
Green Valley Assistance Services dba Valley Assistance Services	Valley Assistance Services for Public Use	pf	2 & 4	\$ 35,500	\$0
Green Valley Assistance Services dba Valley Assistance Services	Valley Assistance Services Workforce Center Improvements for Public Use	pf	2 & 4	\$ 47,500	\$0
Sahuarita Food Bank-Good Shepherd United	Sahuarita Food Bank Facility Improvement	pf	2, 3 & 4	\$ 300,000	\$50,000
Town of Marana	Administration	admin	1 & 3	\$ 20,000	\$13,000
Town of Marana	Colonia-Neighborhood Cleanup	ps	1 & 3	\$ 20,000	\$10,000
Town of Marana	Emergency Home Repair	hsg	1 & 3	\$ 85,000	\$18,500
Town of Marana	Owner-Occupied Housing Rehabilitation	hsg	1 & 3	\$ 85,000	\$18,500
City of South Tucson	Administration	admin	2	\$ 45,000	\$30,000
City of South Tucson	General Plan Update	admin	2	\$ 50,000	\$25,000
City of South Tucson	Code Enforcement Program	ps	2	\$ 15,000	\$10,000
City of South Tucson	Community Cleanup & Green Program	ps	2	\$ 5,000	\$5,000
City of South Tucson	Crime Prevention and Education Program	ps	2	\$ 35,000	\$20,000
City of South Tucson	Facility Upgrades- JVYC	pf	2	\$ 75,000	\$0
City of South Tucson	Fire and Rescue Safety Equipment	pf	2	\$ 30,000	\$10,000
City of South Tucson	Youth Programs	ps	2	\$ 120,000	\$100,000
Living Streets Alliance	South Tucson Bike-Ped Program	ps	2	\$ 25,000	\$20,000
Pima County CDNC	Administration	admin	All	\$ 500,000	\$500,000
Pima County CDNC	Indirect Cost Recovery Policy		All	\$ 250,000	\$213,873
Pima County CDNC	Brownfields	bf	All	\$ 30,000	\$0

Pima County CDNC	Commercial Façade	pf	All	\$ 50,000	\$0
Pima County CDNC	Project Delivery	pf	All	\$ 150,000	\$0
Pima County CDNC	Emergency Demolition	demo	All	\$ 30,000	\$0
Pima County CDNC	Emergency Septic	hsg	All	\$ 100,000	\$75,000
Pima County CDNC	Home Repair Program Lead	hsg	All	\$ 25,000	\$0
Pima County CDNC	Home Repair Program Lead Relocation	hsg	All	\$ 30,000	\$0
Pima County CDNC	Home Repair Program	hsg	All	\$ 1,000,000	\$690,173
Pima County CDNC	Safe, Healthy Green	shg	All	\$ 100,000	\$0
Pima County CDNC	Safe, Healthy Green- Capacity Building	shg	All	\$ 50,000	\$0
Pima County CDNC	Rural Food Pantry Improvement Program	pf	All	\$ 40,000	\$0
Pima County CDNC	Las Artes	pf	All	\$ 15,000	\$5,000
Administration of Resources and Choices	Foreclosure Counseling	ps	1,2,3	\$ 15,000	\$0
Administration of Resources and Choices	Senior Boarding Home Projects	ps	1,2,3	\$ 30,000	\$20,000
Catholic Community Services dba Pio Decimo Center	Getting Ahead	ps	2/All	\$ 51,120	\$30,000
Catholic Community Services dba COPD	Facility Upgrades- AC	pf	2/All	\$ 28,000	\$28,000
Chicanos Por La Causa, Inc.	CPLC Nahui Ollin Wellness Youth Program	ps	All	\$ 60,861	\$10,000
Community Home Repair Projects of Arizona	Emergency Home Repair Program	hsg	All	\$ 225,000	\$175,000
DIRECT Center for Independence	Home Access Program	hsg	All	\$ 75,000	\$50,000
Esperanza En Escalante	Esperanza En Escalante Transistinal Housing				
	Security Upgrades	shg	2/All	\$ 35,000	\$35,000
	Habitat Home Repair Owner-Occupied Housing				
Habitat for Humanity Tucson	Rehabilitation	hsg	All	\$ 150,000	\$50,000
Habitat for Humanity Tucson	Marana Land Acquisition	land	1,3	\$ 198,000	\$0
Incremental Development Alliance	Small Development Training and Tech. Asst.	ps	2,3	\$ 98,000	\$20,000
Interfaith Community Services	Rural Food Bank Asst. Program	ps	1/All	\$ 30,000	\$0
Interfaith Community Services	Increasing ICS Food Bank Capacity	pf	1/All	\$ 75,000	\$20,000
	Pima County Special Diet Meal Delivery				
	Program for Low-Income Seniors and Disabled				
Mobile Meals of Southern Arizona, Inc.	Adults	ps	1,2,4,5	\$ 25,000	\$0
Pima Prevention Partnership	Pima County Teen Court	ps	All	\$ 30,000	\$15,000
Primavera Foundation, Inc.	Alamo Facility Improvement	shg	2/All	\$ 100,000	\$65,000
	Positive Behavior Support Program for Parents				
	of Children with Disabilities and Special Health				
Raising Special Kids	Care Needs	ps	1,2,3,4	\$ 20,000	\$0
Sister Jose Womens Shelter	Sister Jose Goes Solar	shg	2/All	\$ 100,000	\$0
Southern Arizona AIDS Foundation	SAAF Housing Laundry Facilities Upgrade	shg	3/All	\$ 76,000	\$0
Southern Arizona Assoc. for the Visually Impaired	R.E.A.L Program for Blind Children	ps	All	\$ 25,000	
Southwest Fair Housing Council	Fair Housing Enforcement, Education, and Outreach	admin	5/All	\$ 50,000	\$25,000
TMM Family Services, Inc.	Pima County Home Repair for Children and Families	hsg	All	\$ 50,000	\$0
Tucson Clean & Beautiful, Inc.	Growing Climate Resilient Communities	pf	All	\$ 145,000	\$60,000
	Green Stormwater Infrastructure for				
Watershed Management Group	Neighborhood Cleanup	pf	All	\$ 150,000	\$70,000
Total				\$ 6,618,942	\$2,971,606

HUD Eligible Activity Abbreviations: admin = Administration; ps = Public Service; pf = Public Facility Improvement; SHG = Safe Healthy Green Shelter Set Aside; infra = Infrastructure Improvement; hsg = Housing Rehabilitation; ed = Economic Development; land = Land Acquisition; demo = Demolition; bf = Brownfields and Clearance.

FY 2020/2021 Pima County Emergency Solutions Grant (ESG) Program

ESG Component	Agency	Program	Activity Focus	District	20-21 Request	Committee Rec
Street Outreach	Our Family Services	Street Outreach	Families, Individuals	ALL	\$ 32,000	\$ -
Street Outreach	Interfaith Community Svs	Street Outreach	Families, Individuals	ALL	\$ 35,000	\$ -
Emergency Shelter	Emerge!	Emergency Shelter	DV Families	ALL	\$ 40,000	\$ 35,000
Emergency Shelter	Old Pueblo Comm Svs	Emergency Shelter	Families, Individuals	ALL	\$ 191,625	\$ 15,000
Emergency Shelter	Our Family Services	Emergency Shelter	Families, Individuals	ALL	\$ 30,000	\$ 15,000
Emergency Shelter	PC Sullivan Jackson Employment	Motel Voucher	Families, Individuals	ALL	\$ 20,000	\$ 20,000
Emergency Shelter	Primavera Foundation	Casa Paloma	Single Women	ALL	\$ 15,000	\$ 15,000
Emergency Shelter	Primavera Foundation	Family Pathways	Families, Individuals	ALL	\$ 15,000	\$ 15,000
Emergency Shelter	SAAF	Emergency Shelter	Individuals	ALL	\$ 75,000	\$ -
Emergency Shelter	Sister Jose Women's Center	Emergency Shelter	Single Women	2	\$ 40,000	\$ 40,000
Homeless Prevention	Green Valley Assistance Svs	Valley Assistance Family MAP (Map a Plan)	Families, Individuals	4	\$ 30,000	\$ 20,000
Homeless Prevention	CCS dba Pio Decimo Center	Pio Decimo Housing	Families, Individuals	ALL	\$ -	\$ -
Homeless Prevention	Interfaith Community Svs	Homeless Prevention	Families, Individuals	1,4	\$ 50,000	\$ 15,000
Homeless Prevention	PC CSET	Emergency Solutions	Families, Individuals	ALL	\$ 30,000	\$ 15,125
Rapid Rehousing	Interfaith Community Svs	Rapid Rehousing	Families, Individuals	1,4	\$ 75,000	\$ -
Rapid Rehousing	Our Family Services	Rapid Rehousing	Families, Individuals	ALL	\$ 30,000	\$ -
Administration	Pima County, CD Dept.	Program Coordinator	Administration	ALL	\$ 18,480	\$ 16,632
Administration	Pima County, GMI Dept.	Indirect Cost - (10% de minimis)	Administration	ALL	\$ -	\$ 24,640
TOTAL					\$ 757,105	\$ 246,397