

2023 HUD ANNUAL ACTION PLAN

COBB COUNTY, GEORGIA

Cobb County CDBG Program Office

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

Introduction

Cobb County is an entitlement community eligible to receive direct assistance under the U.S. Department of Housing and Urban Development's (HUD) Community Development Block Grant (CDBG) Program. Cobb County is also a participating jurisdiction under the HOME Investment Partnerships Program (HOME) and serves as the lead agency of the Georgia Urban County Consortia (GUCC), which includes Cobb County and the City of Roswell. Cobb County is also a formula grantee under the Emergency Solutions Grant (ESG). Funds for these programs must be expended within the County and GUCC areas for participants who meet applicable eligibility criteria as outlined by program regulations. The Cobb County CDBG Program Office is responsible for the development and administration of the Consolidated Plan and Annual Action Plan.

The Program Year (PY) 2023 Annual Action Plan represents year three of the PY2021-2025 Consolidated Plan conditionally approved by the Cobb County Board of Commissioners on Tuesday, November 8, 2022 and final allocations were approved by the Board on Tuesday, April 11, 2023. The Consolidated Plan is carried out through the Annual Action Plan, which provides a concise summary of the actions, activities, and the specific federal and non-federal resources that will be used in PY2023 to address priority needs and specific goals identified in the Consolidated Plan.

Purpose and importance of the Consolidated Plan and Annual Action Plan:

As a recipient of federal grant funds, Cobb County is required by HUD to produce a Consolidated Plan and Annual Action Plan. Cobb County has contracted with WFN Consulting for the production of these planning documents. These plans serve as the application for funding for the following federal entitlement programs that serve low-income individuals and/or families:

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

Cobb County's PY2023 Annual Action Plan identifies projects in which these funds will be utilized to carry out previously identified priorities and goals that were established in the County's PY2021-2025 Consolidated Plan. The priority needs were established through a collaborative process with citizens, public interest groups, and other stakeholders in Cobb County, the City of Roswell, and the City of Smyrna. As required by HUD, each activity is linked to one of the three federal

programs objectives: 1) decent housing, 2) suitable living environment, and 3) economic development. Each objective is matched with one of three HUD outcomes: 1) availability/accessibility, 2) affordability, or 3) sustainability for low-moderate income persons. The PY2021-2025 Consolidated Plan funding priorities were divided into five categories designed to benefit low and moderate-income persons, as shown in Figure 1.

PY2021-2025 Consolidated Plan Priorities



Figure 1: Consolidated Plan Priorities

The following goals were established in the PY2021-2025 Consolidated Plan based on the priorities shown above:

Affordable Housing

- Acquisition, Rehabilitation, and New Construction of Affordable Housing
- Tenant Based Rental Assistance/Rapid Re-housing
- Housing Rehabilitation

<u>Increasing Housing Options for</u> <u>Homeless</u>

Supportive Services for Homeless Persons

<u>Neighborhood Revitalization &</u> <u>Redevelopment</u>

Acquire/Construct/Rehabilitate Public Facilities

Increase Capacity of Public Services

Provide Funding to Support Public Service Programs

<u>Increase Funding for Economic</u> <u>Development</u>

> Support for Economic Development Activities

2. Summarize the objectives and outcomes identified in the Plan

<u>Annual Objectives</u>: The following is an outline of the strategic priorities identified in the PY2021-2025 Consolidated Plan. As required by HUD, each activity is linked to one of the three federal programs objectives: 1) decent housing, 2) suitable living environment, and 3) economic development. Each objective is matched with one of three outcomes: 1) availability/accessibility, 2) affordability, or 3) sustainability for low-moderate income persons. The annual activities that will enable Cobb County to achieve these objectives and outcomes in PY2023 are listed in Table 1.

Program Objectives	Activities
Decent Housing	 Acquisition, rehabilitation, and new construction of affordable single family and rental housing Down-payment assistance Tenant Based Rental Assistance Providing property and development grant subsidies for developers to build affordable housing for eligible homebuyers; Promoting education to Affirmatively Further Fair Housing (AFFH)
Suitable Living Environment	 Rehabilitation, acquisition, accessibility improvements of neighborhood facilities Housing rehabilitation Park improvements Sidewalk and infrastructure improvements Health and dental services Services for the homeless and at-risk populations Youth and childcare programs Transportation for seniors and youth Supportive and transitional housing Support services for populations with special needs (e.g. elderly, persons with disabilities)
Economic Development	Expansion of business products based on community need

CDBG Accomplishments

CDBG funds were allocated for park improvements, housing rehabilitation, acquisition of equipment and facilities, community center renovations, youth development services, fair housing activities, case management services, programs for developmentally disabled adults, and programs for abused and neglected children. During the 2021 program year, 4,075 Cobb County residents received assistance through the Community Development Block Grant Program. The County in coordination with its Subrecipients expended a total of \$4,155,064.20 in CDBG funding of which 2,817,664.40 was expended in CDBG Public Facility funding, \$524,565.03 was expended in CDBG Public Services funding, \$632,016.75 was expended in CDBG planning and administration funding, and \$13,946.52 was expended in CDBG Program Income. An additional \$166,871.50 in CDBG funding was expended in the County's Minor Home Repair Grant program to assist 13 low income households with minor home repairs. CDBG public facility projects are highlighted below:

- MUST Ministries, Inc. expended **\$500,000.00** in CDBG Public Facility funding for land acquisition for their new campus located at 1206 Cobb Parkway North.
- ➤ Girls, Inc. expended **\$241,953.83** in CDBG public facility funding to undertake facility upgrades for their Marietta Center located at 461 Manget Street SE, Marietta, Georgia.
- ➤ The City of Acworth expended **\$54,292.15** in CDBG public facility funding for design of the Rosenwald Community Center renovation.
- ➤ The City of Austell expended **\$133,781.10** in CDBG public facility funding for park improvements at Veterans Memorial and Legion Field Parks.
- ➤ The City of Kennesaw expended **\$422,119.68** in CDBG public facility funding for storm water improvements and sidewalk installation in the Kennesaw Heights neighborhood.
- ➤ The City of Powder Springs expended **\$201,151.53** in CDBG public facility funding for Senior Center renovations and park Hopkins Park improvements.
- > The City of Smyrna expended **\$635,253.54** in CDBG public facility funding for bathroom renovations and HVAC upgrades at their Community Center and sidewalk installation at their Senior Center.

CDBG-CV Program Highlights

In 2021, Cobb County received a total of **\$5,379,209.00** in Community Development Block Grant Covid-19 [CDBG-CV] funding through the Coronavirus Aid, Relief, and Economic Security Act [CARES Act] through supplemental funding to the Community Development Block Grant program to areas to prevent, prepare for, and respond to Coronavirus.

Since the inception of the County's CDBG-CV program, the County has expended \$3,311,156.23 (61%) of CDBG-CV funding. A total of 89,226 Cobb residents have benefited from CDBG-CV funds. The County has expended \$2,505,701.84 in CDBG-CV funding for public service activities to mitigate the effects of the Coronavirus through the purchase of COVID-19 supplies, PPE, emergency rental assistance, and other equipment. The County's Subrecipients utilized \$1,575,886.18 of the CDBG-CV public services funding for emergency subsistence-type payments such as rent or mortgage directly to service providers. A total of 706 Cobb residents have been served through the CDBG-CV Emergency Rental Assistance program. A total of \$620,360.49 was expended for CDBG-CV planning and administration and \$185,093.90 was expended for CDBG-CV public facility activities to rehabilitate community facilities to establish infectious disease treatment areas and increase social distancing.

HOME Accomplishments

The County addressed affordable housing initiatives through the acquisition of rental housing, acquisition, and new construction of single-family homes, tenant-based rental assistance, and down-payment assistance. During 2021, the County expended a total of \$824,017.96 in HOME funds. Of the total HOME funds expended, \$368,474.10 was expended with HOME grant funds and \$455,543.86 was expended in program income. A total of 211 Cobb County residents were assisted through the Tenant Based Rental Assistance (TBRA) Program. Additionally, the County added five newly constructed single-family homes to its affordable housing stock and provided six homebuyers with Down Payment Assistance (DPA).

ESG Accomplishments

The County addressed ESG homelessness initiatives by allocating funding for the following eligible ESG activities: homeless prevention, emergency shelter, and administration and planning. During 2021, Cobb County expended \$261,367.22 in ESG program funds. As reflected in the County PR91 ESG Financial Summary Report, 53.04% of ESG funds was expended for emergency shelter activities, while 34.67% was expended for homeless prevention activities, and 4.11% was

expended for administration.

A total of **3,572** Cobb County residents were assisted through the ESG Program. A total of **490** persons were assisted by emergency shelter service providers and **3,082** persons was assisted by homeless prevention providers.

Summary of citizen participation process and consultation process:

During the preparation of the draft PY2023 Annual Action Plan, initial Public Review Meeting was held on Wednesday, September 28, 2022 to obtain comments on the PY2023 Annual Action Plan draft and 70% funding recommendations for CDBG, HOME, and ESG Programs. A 30-day comment period for the 70% funding recommendation commences on Tuesday, September 13, 2022 and will conclude on Monday, October 17, 2022. The County also held a second public hearing on Wednesday, March 22, 2023 to obtain comments on the PY2023 Annual Action Plan final funding recommendations for CDBG, HOME, and ESG Programs.

The PY2023 Annual Action Plan is available for review in hard copy at the Cobb County CDBG Program Office, located at 192 Anderson Street, Suite 150, Marietta, GA 30060 and on the Cobb County CDBG Program Office's website: www.cobbcounty.org/cdbg.

Summary of public comments:

A summary of public comments that were received at the Public Review Meeting are listed below: TBD

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

The Cobb County CDBG Program Office will accept all comments received during the Public Comment Period and Public Review Meeting.

Summary:

This Annual Action Plan identifies projects in which the County will use CDBG, HOME, and ESG funds to carry out previously identified priorities that were established in the County's PY2021-2025 Consolidated Plan. The identification of these specific priorities is a product of extensive consultation with community stakeholders combined with data from the U.S. Census and other sources that indicates specific housing and community development needs in Cobb County.

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

Agency/entity responsible for preparing/administering the Consolidated Plan:

The following entity is responsible for preparing the Consolidated Plan and administering the County's HUD grant programs

Agency Role	Name	Department/Agency
Lead Agency	Cobb County	Cobb County CDBG Program Office

Table 1- Responsible Agencies

Narrative

Cobb County is the lead agency for the development, administration, and review of the Annual Action Plan. The Cobb County CDBG Program Office is fully staffed and managed by WFN Consulting, a program management consulting firm that specializes in HUD grant programs and has managed all facets of Cobb County's HUD grant programs since 1981. Administrative support and oversight are provided by Cobb County's Department of Finance. Additionally, Cobb County's Finance Department collaborates with the CDBG Program Office on all financial matters, internal controls, and processes.

The CDBG Program Office researched and prepared this Action Plan to provide a comprehensive strategy to address housing and community development needs in the County with CDBG, HOME, and ESG Program funds.

Consolidated Plan Public Contact Information:

Public concerns, issues, or comments may be directed to:

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AP-10 Consultation

Introduction

Cobb County conducted significant consultation with citizens, municipal officials, non-profit agencies, public housing agencies, private developers, governmental agencies, and the Continuum of Care in preparing the PY2021-2025 Consolidated Plan associated with this Action Plan. The County held two public meetings to review a draft of this Action Plan and current year priorities. This meeting is summarized in the Citizen Participation Section of this Plan.

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)).

The **Marietta Housing Authority** is the local public housing agency and was consulted in the preparation of the Consolidated Plan associated with this Action Plan. This agency provided data on tenant and housing choice voucher holder characteristics, waiting lists, and future plans for development.

In addition to the public housing agencies, the County consulted with other private and governmental agencies, mental health, and service agencies in the preparation of the Consolidated Plan associated with this Action Plan. These agencies also provided input during the public participation process.

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.

Cobb County is a part of the Marietta/Cobb Continuum of Care. The Marietta/Cobb Continuum's goal is to provide solutions to end homelessness in Cobb County through education, resources, and advocacy. In consultation to develop this Action Plan, Cobb County consulted with the Continuum to gain access to all CoC data. The County was provided data from the Homeless Management Information System (HMIS), Point-in-Time Count (PIT), the Housing Inventory Count, and information from the Annual Homeless Assessment Report (AHAR). Through this collaboration, the County ensures that CoC goals and the County's Consolidated Plan priorities are integrated into the Action Plan.

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.

The County coordinates with the Marietta/Cobb Continuum of Care, which is responsible for the administration of the Continuum of Care in Cobb County. This structure provides the internal connective mechanism among County departments and outside entities which serve the homeless throughout the County.

As the Cobb County CDBG Program Office administers the ESG program, close coordination occurs with the CoC in establishing priorities for the ESG Program. A part of this coordinated process includes the planning and operation of Cobb County's Homeless Management Information System (HMIS).

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

During the development of the Consolidated Plan, the County launched a collaborative effort to consult with elected officials, City departments, community stakeholders, and beneficiaries of entitlement programs to inform and develop the priorities and strategies contained within the five-year Consolidated Plan.

The County's outreach and consultation strategies included the formation of community outreach partnerships with housing, service, and mental health providers; workforce developers; community advocates; and others.

Stakeholder meetings were conducted to solicit input from the community at large. Results of the community forums and surveys were reported in the Consolidated Plan. Each segment of the community outreach and planning process was transparent to ensure the Public knew their input was being collected, reviewed, and considered.

As part of the effort to implement the policies, programs and projects identified in the Consolidated Plan, the County works collaboratively with staff from the housing, social services agencies, and other entities to inform and develop the housing and homeless priorities and strategies contained in this Action Plan. The following table is of organizations that were consulted:

Agency/Group/ Organization	Agency/Group/ Organization Type	Section of Plan Addressed by Consultation	How Consulted
MUST Ministries	Services - Homeless	Homeless Needs; Non- Homeless Special Needs	Public Meeting
LiveSafe	Services – Victims of Domestic Violence	Non –Homeless Special Needs	Public Meeting
Girls Inc	Services - Children	Non –Homeless Special Needs	Public Meeting
The Extension	Services - Homeless	Homeless Needs	Public Meeting
City of Kennesaw	Other Government - Local	All	Public Meeting
Cobb Community Service Board	Other Government - Local	All	Public Meeting
Cobb County	Other Government - County	All	Public Meeting
Atlanta Legal Aid	Services – Fair Housing	Non-Homeless Special Needs	Public Meeting
Communities in Schools	Services - Children	Non –Homeless Special Needs	Public Meeting
SafePath Children's Advocacy	Services - Children	Non-Homeless Special Needs	Public Meeting
Tommy Nobis Center	Services – Employment	Non –Homeless Special Needs	Public Meeting
Walton Communities	Housing	Housing Needs Assessment	Public Meeting
Marietta YELLS	Services - Children	Non –Homeless Special Needs	Public Meeting
Center for Family Resources	Services - Homeless	Homeless Needs; Non- Homeless Special Needs	Public Meeting
Sheltering Arms	Services - Children	Non –Homeless Special Needs	Public Meeting
City of Powder Springs	Other Government - Local	All	Public Meeting
St. Vincent de Paul Society	Services - Homeless	Homeless Needs; Non- Homeless Special Needs;	Public Meeting
Marietta Housing Authority	РНА	Public Housing Needs	Public Meeting
Cole Street Development	Housing	Housing Needs Assessment	Public Meeting

Zion Keepers	Housing	Housing Needs Assessment	Public Meeting
Latin American Association	Services – Housing	Housing Needs	Public Meeting
Zion Baptist Church	Services	Housing Needs	Public Meeting

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

Cobb County did not exclude any agency type or agency during this process.

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	Marietta/Cobb Continuum of Care	Coordinating homelessness services with Continuum of Care priorities

Table 3 – Other local / regional / federal planning

AP-12 Participation

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

During the preparation of the draft PY2023 Annual Action Plan, initial Public Review Meeting was held on Wednesday, September 28, 2022 to obtain comments on the PY2023 Annual Action Plan draft and 70% funding recommendations for CDBG, HOME, and ESG Programs. A 30-day comment period for the 70% funding recommendation commences on Tuesday, September 13, 2022 and will conclude on Monday, October 17, 2022. A final allocation public review meeting will be held upon release of the 2023 allocations by HUD. The County also held a second public hearing on Wednesday, March 22, 2023 to obtain comments on the PY2023 Annual Action Plan final funding recommendations for CDBG, HOME, and ESG Programs. The PY2023 Action Plan was available for review in hard copy at the Cobb County CDBG Program Office, located at 192 Anderson Street, Suite 150, Marietta, GA 30060 and on the Cobb County CDBG Program Office's website: www.cobbcounty.org/cdbg.

In an attempt to increase public participation, the County actively maintains communication with local nonprofits and housing developers and will adhere to the following actions to improve citizen participation:

Actions to improve participation

- Conduct public meetings in various communities throughout the County to ensure that meetings are held at a convenient location for residents of the County;
- Conduct workshops at various locations throughout the County; provide ADA accessibility for all persons with disabilities; and provide interpretation for limited English proficiency clientele;
- Use electronic and print media to solicit public participation through various media outlets including, but not limited to, the Marietta Daily Journal, Mundo Hispanico, and The GA Voice. This includes sending mass emails to County and Municipal employees, nonprofit organizations, and local businesses; advertising on the County's public access channel (Cobbline); posting advertisements in the County's electronic newsletter; and posting information on the Cobb County CDBG Program Office website;
- Translate public notices and relate materials for limited English proficiency clientele;
- Review and respond to all citizen comments and incorporate such comments in the Action Plan, as applicable;

- Analyze the impact of Action Plan program activities on neighborhood residents, particularly low and moderate-income persons;
- Conduct Needs Assessments and appropriate on-site visits to each proposed project before including it in the proposed Consolidated Plan;
- Meet with neighborhood groups to inform them about the County's priorities, project eligibility, the program planning process, project selection and funding, and the project implementation process.
- For all properties acquired (either in-part, or in whole) with Community Development Block Grant (CDBG) funds for use as an eligible public facility that are either owned by the County or are subsequently transferred back to the County for future lease-back or sale to another non-profit or for-profit entity under the "Continued-Use" provisions, the Cobb County CDBG Program Office shall notify in writing all property owners within a one-thousand (1,000) foot radius of the CDBG subject property.

Citizen Participation Outreach

Mode of Outreach	Target of Outreach	Summary of response/ attendance	Summary of comments received	Summary of comments not accepted and reasons
Public Meeting	Non-targeted/broad community	The public was notified of the public meeting via the Cobb County website and the CDBG webpage.	Pending	Pending
Newspaper Ad	Non-targeted/broad community	The public was notified of the public meeting via a newspaper ad in the Marietta Daily Journal and Mundo Hispanico	No comment recorded.	No comment recorded.
Web Ad	Non-targeted/broad community	The public was notified of the public meeting via a web ad placed on The GA Voice	No comment recorded.	No comment recorded.
Email Notification			No comment recorded.	No comment recorded.

Table 4 – Citizen Participation Outreach

AP-15 Expected Resources

Introduction

Cobb County uses multiple resources to carry out activities that benefit low- and moderate-income persons. Cobb County receives entitlement funding for CDBG, HOME, and ESG. The CDBG Program Office administers the funding on behalf of the County. On Monday, February 27, 2023, HUD published the PY2023 allocations for the CDBG, HOME and ESG programs. Cobb County was allocated \$3,063,220.00 in CDBG funds, \$1,605,088.00 in HOME funds and \$277,436.00 in ESG funds. The County also anticipates received up to \$75,000.00 in program income from the following programs: CDBG (\$25,000.00) and HOME (\$50,000.00) thereby receiving a grand total of \$5,020,744 in HUD funds.

Priority Table

Table 5 - Expected Resources - Priority Table

Program of funds CDBG Public - Federal HOME Public - Federal Public - Federal				Ex	Expected Amount Available Year 3			Expected	
CDBG Public – Federal Federal Housing Public Improvements Public Services Acquisition Homebuyer Assistance Homeowner Rehab Multifamily Rental New Construction Multifamily Rental Rehab Financial Assistance Financial Assistance	_	of	Uses of Funds				Total	Amount Available Remainder of ConPlan	Narrative Description
HOME Public – Federal Public – Federal Rehab Multifamily Rental Rehab Sistance Sistance Sistance Financial Assistance Sistance Si	CDBG		Admin and Planning Economic Development Affordable Housing Public Improvements	\$3,063,220	\$25,000.00	n/a	\$3,088,220	\$6,176,440	CDBG funds used throughout the County will leverage other federal, local and private funds.
Financial Assistance	HOME		Homebuyer Assistance Homeowner Rehab Multifamily Rental New Construction Multifamily	\$1,605,088	\$50,000.00	n/a	\$1,655,088	\$3,310,176	HOME funds will leverage other federal, local, and private funds. Subrecipient or developers supply 25% match of HOME funds.
ESG Public – Federal Shelter Rapid re-housing Rental Assistance Transitional Housing	ESG		Financial Assistance Overnight shelter Rapid re-housing Rental Assistance Transitional Housing					\$554,872 \$10,041,488.00	ESG match requirements will be met by requiring organizations to meet a 100% match of all funds received.

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

Cobb County will use a combination of public and private funding to carry out activities identified in this Action Plan. During PY2023, the County will research opportunities to apply for additional funding streams which are consistent with the goals of the Consolidated Plan. Currently, the County uses its Community Services Block Grant (CSBG), Emergency Food and Shelter Program (EFSP) program funds, and Justice Assistance Grant (JAG) program funds to offset funding reductions through its HUD CPD program funding. Cobb County will also work with non-profit organizations to encourage leveraging of available funding sources and strengthen organizational capacity.

The HOME program requires a 25% match of the total HOME funds expended for project costs. This match requirement will be met by requiring subrecipients to provide 25% match on projects, through sponsorships from local businesses, waived County fees, donated land or improvements, volunteer hours, donated materials, or other eligible methods outlined in the HOME regulations. As a requirement, HOME subrecipients submit a match log that identifies the sources of match funds from each fiscal year. Historically, match amounts for HOME subrecipients have far exceeded the 25% annual contributions requirements stipulated by HOME program regulations.

The ESG program requires a 100% match for the total amount of ESG funds expended. ESG subrecipients are required to provide a dollar-for-dollar match through the value of volunteer hours, private donations, salary not covered by ESG, other grant funding, in-kind donations, or by other eligible methods as provided in the ESG regulations.

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

During PY2023, the County does not anticipate using publicly owned land or property to address the needs identified in the Annual Action Plan.

Annual Goals and Objectives

AP-20 Annual Goals and Objectives

Goals Summary Information

Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
New Construction/ Acquisition/ Rehabilitation	2023	2023	Affordable Housing	Countywide	Increase Access to Affordable Housing;	HOME and CDBG	Rental Units Constructed: 10 Household Housing Unit Rental Units Rehabilitated: 5 Household Housing Unit Homeowner Housing Added: 10 Household Housing Unit
2. Affirmatively Furthering Fair Housing Activities	2023	2023	Fair Housing	Countywide	Affirmatively Furthering Fair Housing (AFFH)	CDBG	Fair Housing: 1000 Persons Assisted
3. Financial Assistance for Affordable Housing	2023	2023	Affordable Housing	Countywide	Increase Access to Affordable Housing; Increase Housing Options for Homeless	HOME and ESG	Direct Financial Assistance to Homebuyers: 10 Households Assisted Tenant-based Rental Assistance/Rapid Rehousing: 49 Households Assisted

4. Supportive Services for Homeless Persons	2023	2023	Homeless	Countywide	Increase Housing Opportunities for Homeless	ESG	Homeless Person Overnight Shelter: 287 Persons Assisted Homelessness Prevention: 115 Persons Assisted
5. Acquire/ Construct/ Rehabilitate Public Facilities	2023	2023	Non-Housing Community Development Needs	Countywide	Neighborhood Revitalization and Reinvestment	CDBG	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 69,000 Persons Assisted
6. Provide Funding to Support Public Service Programs	2023	2023	Non-Housing Community Development Needs	Countywide	Increase the Capacity of Public Services	CDBG	Public Service Activities other than Low/Moderate Income Housing Income Benefit: 9,000 Persons Assisted
7. Administration/Planning	2023	2023	Admin/Planning	Countywide	Administration/Planning	CDBG, HOME, ESG	Planning/Administration

Table 1 – Goals Summary

Table 7 – Goal Descriptions

Goal Name	Description
1. New Construction/ Acquisition/ Rehabilitation	New construction/acquisition/rehabilitation of affordable housing units
2. Affirmatively Furthering Fair Housing Activities	Accessibility improvements, fair housing enforcement and education
3. Financial Assistance for Affordable Housing	Provide support for tenant-based rental assistance, down payment assistance, and rapid rehousing and homeless prevention programs.
4. Supportive Services for Homeless Persons	Provide supportive services to persons who are homeless and at risk for homelessness
5. Acquire/ Construct/ Rehabilitate Public Facilities	Fund public facility improvements in the County that benefit low income households and persons, and persons with special needs to include senior centers, neighborhood facilities, youth centers, childcare centers, health facilities, handicapped centers, abused and neglected children facilities, parks and recreational facilities, and other facilities; fund non-housing community development proposals in the County that eliminate a threat to public health and safety to include water/sewer improvements, flood/drainage improvements, sidewalks, street improvements, and other infrastructure improvements
6. Provide Funding to Support Public Service Programs	Fund projects that provide recreational activities, educational opportunities, and job skills to youth; supportive services to low and moderate income households and persons with special needs; assistance to businesses to create and/or retain jobs for low and moderate income persons; and support for job training, continuing education, and employment services designed to assist low and moderate income persons obtain jobs
7. Provide Administrative Structure	Provide the administrative structure for the planning, implementation, and management of the CDBG, HOME, and ESG grant programs as well as other housing, community development, and homelessness programs

AP-35 Projects

Introduction

The activities selected for inclusion in this Action Plan are based on the PY2021-2025 Consolidated Plan priorities and public input. During PY2023, Cobb County will initiate activities to ensure that community development, affordable housing, and homelessness goals are achieved.

PY2023 Project Information

Project	PY2023 Funding	Description	Annual Goals	Target Areas	Priority Needs Addressed
City of Acworth	\$99,726.78	Facility Improvements	Acquire/Construct/ Rehabilitate Public Facilities and Infrastructure	City of Acworth	Neighborhood Revitalization and Redevelopment
City of Austell	\$36,594.77	Facility Improvements	Acquire/Construct/ Rehabilitate Public Facilities and Infrastructure	City of Austell	Neighborhood Revitalization and Redevelopment
City of Kennesaw	\$147,540.26	Woodland Acres Infrastructure Improvements	Acquire/Construct/ Rehabilitate Public Facilities and Infrastructure	City of Kennesaw	Neighborhood Revitalization and Redevelopment
City of Powder Springs	\$74,574.02	Facility Improvements	Acquire/Construct/ Rehabilitate Public Facilities and Infrastructure	City of Powder Springs	Neighborhood Revitalization and Redevelopment
Cobb County Housing Rehabilitation Administration	\$195,000.00	Occupied Housing Rehabilitation Administration	Address needs of low-income homeowners	County wide	Admin/Planning
Cobb County Owner- Occupied Housing Rehabilitation Grants	\$250,000.00	Occupied Housing Rehabilitation Grants	Address needs of low income homeowners	County wide	Affordable Housing
The Center for Family Resources, Inc.	\$20,000.00	TBRA Case Management	Address Public Service Needs of Low-Income and Special Needs Populations:	County wide	Increase Public Service

The Extension Inc	\$67,859.00	Women Shelter - Operating Costs	Address Public Service Needs of Low-Income and Special Needs Populations:	County wide	Increase Public Service
Girls Inc.	\$25,000.00	Youth Afterschool Program - Operating Costs	Address Public Service Needs of Low-Income and Special Needs Populations:	County wide	Increase Public Service
Goodwill of North Georgia	\$7,500.00	Job Readiness	Address Public Service Needs of Low-Income and Special Needs Populations:	County wide	Increase Public Service
Davis Direction Foundation, Inc	\$15,000.00	Case Management - Operating Costs	Address Public Service Needs of Low-Income and Special Needs Populations:	County wide	Increase Public Service
Fair Housing Activities	\$10,000.00	Fair Housing Activities	Address Public Service Needs of Low-Income and Special Needs Populations:	County wide	Increase Public Service
Latin American Association	\$20,000.00	Case Management - Operating Costs	Address Public Service Needs of Low-Income and Special Needs Populations:	County wide	Increase Public Service
MUST Ministries, Inc.	\$30,000.00	TBRA Case Management	Address Public Service Needs of Low-Income and Special Needs Populations:	County wide	Increase Public Service
Safepath Children's Advocacy Center, Inc	\$90,000.00	Youth Services - Operating Costs	Address Public Service Needs of Low-Income and Special Needs Populations:	County wide	Increase Public Service
Salvation Army (Marietta Corps)	\$15,000.00	Case Management - Operating Costs	Address Public Service Needs of Low-Income and Special Needs Populations:	County wide	Increase Public Service
Youth Empowerment through Learning, Leading, and Serving, Inc. (YELLS)	\$15,000.00	Youth Afterschool Program - Operating Costs	Address Public Service Needs of Low-Income and Special Needs Populations:	County wide	Increase Public Service

Zion Baptist Church	\$10,000.00	Housing Program - Operating Costs	Address Public Service Needs of Low-Income and Special Needs Populations:	County wide	Increase Public Service
Zion Keepers, Inc.	\$72,859.00	TBRA Case Management - Operating Costs	Address Public Service Needs of Low-Income and Special Needs Populations:	County wide	Increase Public Service
WorkSource Cobb	\$300,000.00	Facility Renovations	Acquire/Construct/ Rehabilitate Public Facilities and Infrastructure	County wide	Neighborhood Revitalization and Redevelopment
Cobb County Property Management	\$100,000.00	Facility Renovations	Acquire/Construct/ Rehabilitate Public Facilities and Infrastructure	County wide	Neighborhood Revitalization and Redevelopment
Girls Inc.	\$50,000.00	Facility Renovations	Acquire/Construct/ Rehabilitate Public Facilities and Infrastructure	County wide	Neighborhood Revitalization and Redevelopment
LiveSAFE Resources, Inc.	\$15,500.00	Facility Renovations	Acquire/Construct/ Rehabilitate Public Facilities and Infrastructure	County wide	Neighborhood Revitalization and Redevelopment
MUST Ministries, Inc.	\$300,000.00	New Facility Construction	Acquire/Construct/ Rehabilitate Public Facilities and Infrastructure	County wide	Neighborhood Revitalization and Redevelopment
Special Needs Cobb	\$87,376.09	Facility Renovations	Acquire/Construct/ Rehabilitate Public Facilities and Infrastructure	County wide	Neighborhood Revitalization and Redevelopment
The Center for Children & Young Adults	\$50,000.00	Facility Renovations	Acquire/Construct/ Rehabilitate Public Facilities and Infrastructure	County wide	Neighborhood Revitalization and Redevelopment
The Extension, Inc	\$150,000.00	Facility Renovations	Acquire/Construct/ Rehabilitate Public Facilities and Infrastructure	County wide	Neighborhood Revitalization and Redevelopment
City of Smyrna CDBG Activities & Admin	\$245,057.60	Administration & Planning - Various Public Facility Projects	Administration and Planning	City of Smyrna	Admin/Planning, Neighborhood Revitalization and Redevelopment

Cobb County CDBG Program Office - CDBG Administration	\$563,632.48	Administration and Planning	Administration and Planning	County wide	Admin/Planning
Cobb County CHDO Operating	\$74,636.59	CHDO Operating	Operating	County wide	Operating
Cole Street Development (CHDO) 15%	\$223,909.78	CHDO Activities	New Construction/Acqui sition/ Rehabilitation of Housing for Persons who are Elderly, Disabled, or Homeless	County wide	Affordable Housing
Cole Street Development Affordable Housing Activities	\$447,165.09	Acquisition & Rehabilitation - Rental	New Construction/Acqui sition/ Rehabilitation of Housing for Persons who are Elderly, Disabled, or Homeless	County wide	Affordable Housing
Habitat for Humanity of NW Metro Atlanta, Inc	\$250,000.00	Acquisition	New Construction/Acqui sition/ Rehabilitation of Housing for Persons who are Elderly, Disabled, or Homeless	County wide	Affordable Housing
The Center for Family Resources, Inc. TBRA	\$60,000.00	Tenant Based Rental Assistance	Tenant Based Rental Assistance	County wide	Affordable Housing
LiveSafe Resources, Inc. TBRA	\$60,000.00	Tenant Based Rental Assistance	Tenant Based Rental Assistance	County wide	Affordable Housing
MUST Ministries, Inc. TBRA	\$87,747.20	Tenant Based Rental Assistance	Tenant Based Rental Assistance	County wide	Affordable Housing
Zion Keepers, Inc. TBRA	\$100,000.00	Tenant Based Rental Assistance	Tenant Based Rental Assistance	County wide	Affordable Housing
City of Roswell HOME Administration	\$11,235.62	Administration	Administration and Planning	City of Roswell	Admin/Planning

The Salvation Army, A Georgia Corporation	\$40,000.00	Tenant Based Rental Assistance	Tenant Based Rental Assistance	County wide	Affordable Housing
City of Roswell CHDO 15% and CHDO Operating	\$22,471.23	CHDO Activities and Operating	New Construction/Acqui sition/ Rehabilitation of Housing for Persons who are Elderly, Disabled, or Homeless	City of Roswell	Affordable Housing
City of Roswell Affordable Housing Activities	\$78,649.31	Acquisition & Rehabilitation	New Construction/Acqui sition/ Rehabilitation of Housing for Persons who are Elderly, Disabled, or Homeless	City of Roswell	Affordable Housing
Cobb County HOME Program Administration	\$149.273.18	Program Administration	Administration and Planning	County wide	Admin/Planning
The Center for Family Resources, Inc.	\$25,000.00	Shelter Operations - Emergency Shelter	Provide Support for Emergency Housing and Supportive Services for the Homeless	County wide	Eliminate Homelessness
LiveSAFE Resources, Inc.	\$25,000.00	Shelter Operations - Domestic Violence Shelter	Provide Support for Emergency Housing and Supportive Services for the Homeless	County wide	Eliminate Homelessness
MUST Ministries, Inc.	\$25,000.00	Shelter Operations - Emergency Shelter	Provide Support for Emergency Housing and Supportive Services for the Homeless	County wide	Eliminate Homelessness
Society of Saint Vincent De Paul	20,000.00	Shelter Operations - House of Dreams for Women	Provide Support for Emergency Housing and Supportive Services for the Homeless	County wide	Eliminate Homelessness

Grand Total	\$4,938,244.00				
Cobb County ESG Program Administration	\$20,807.70	Administration	Administration and Planning	County wide	Admin/Planning
Zion Keepers, Inc.	\$30,000.00	Homeless Prevention for Veterans	Provide Support for Emergency Housing and Supportive Services for the Homeless	County wide	Eliminate Homelessness
Zion Baptist Church	\$20,000.00	Homelessness Prevention	Provide Support for Emergency Housing and Supportive Services for the Homeless	County wide	Eliminate Homelessness
Salvation Army	\$21,447.83	Homelessness Prevention	Provide Support for Emergency Housing and Supportive Services for the Homeless	County wide	Eliminate Homelessness
Latin American Association, Inc.	\$30,000.00	Homelessness Prevention	Provide Support for Emergency Housing and Supportive Services for the Homeless	County wide	Eliminate Homelessness
Davis Direction	\$20,180.47	Homelessness Prevention	Provide Support for Emergency Housing and Supportive Services for the Homeless	County wide	Eliminate Homelessness
The Extension, Inc.	\$40,000.00	Shelter Operations - Shelter Program & Operations for Men's Shelter	Provide Support for Emergency Housing and Supportive Services for the Homeless	County wide	Eliminate Homelessness

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

The projects were selected to meet identified needs in the community with the resources provided. Limited financial resources to finance programs and projects is the greatest obstacle to meeting the municipality's underserved needs.

Cobb County recognizes there are multiple needs for low and moderate-income persons in the County that are met through the use of CDBG, HOME, and ESG funds. These needs include access to affordable housing for low and moderate-income persons, housing options for homeless and at-risk populations; increased capacity for public services, addressing community development needs, and access to economic development activities.

The County prioritizes grant allocations by ensuring that proposed projects will directly benefit low and moderate-income persons and/or households as defined by HUD's Income Limit Guidelines based on the Atlanta-Sandy Springs-Marietta Metro Statistical Area (MSA).

AP-38 Project Summary

Project Summary Information

	PROJECT NAME				
Project #	Community Development Block Grant Activities				
1	Cobb County CDBG Program Office Administration and Planning - Contract				
2	Cobb County CDBG Program Office Administration and Planning				
3	City of Acworth - Facility Improvements				
4	City of Austell - Facility Improvements				
5	City of Kennesaw - Infrastructure Improvements				
6	City of Powder Springs -Facility Improvements				
7	Cobb County Housing Rehabilitation Program - Administration				
8	Cobb County Housing Rehabilitation Program				
9	Atlanta Legal Aid Society - Legal Services - Operating Costs				
10	Cobb County - Fair Housing Activities				
11	Davis Direction Foundation, Inc - Case Management - Operating Costs				
12	Girls Inc Youth Afterschool Program - Operating Costs				
13	Goodwill of North Georgia - Job Readiness				
14	Latin American Association - Case Management - Operating Costs				
15	Must Ministries, Inc TBRA Case Management - Operating Costs				
16	Safepath Children's Advocacy Center, Inc Youth Services - Operating Costs				

17	The Center for Family Resources, Inc TBRA Case management
18	The Extension, Inc Women Shelter - Operating Costs
19	The Salvation Army Marietta Corps - Case Management - Operating Costs
20	Youth Empowerment through Learning, Leading, and Serving, Inc. (YELLS) - Afterschool Program - Operating Costs
21	Zion Baptist Church - Case Management - Operating Costs
22	Zion Keepers, Inc TBRA Case Management - Operating Costs
23	WorkSource Cobb - Facility Renovations ¹
24	MUST Ministries, Inc New Facility Construction ²
25	Cobb County Property Management - Facility Renovations
26	Girls Inc Facility Renovations
27	LiveSafe Resources, Inc Facility Renovations
28	Special Needs Cobb - Facility Renovations
29	The Center for Children & Young Adults Facility Renovations
30	The Extension, Inc New Facility Construction
31	City of Smyrna - Administration & Planning
32	City of Smyrna - Administration & Planning Cobb County CDBG Office
33	City of Smyrna - Various Public Facility Projects
	HOME Program Activities
34	Cobb County HOME Program Administration
35	Cole Street Development Corporation - CHDO Activities (15%)
36	Cole Street Development Corporation - CHDO Operating (5%)
37	City of Roswell Administration
38	City of Roswell Administration to Cobb County
39	City of Roswell - CHDO Activities (15%)
40	City of Roswell CHDO - CHDO Operating (5%)
41	City of Roswell - Affordable Housing Activities
42	Cole Street Development Corporation -Acquisition & Rehabilitation - Rental
43	Habitat for Humanity of NW Metro Atlanta, Inc - Acquisition
44	The Center for Family Resources, Inc Tenant Based Rental Assistance
45	LiveSafe Resources, Inc Tenant Based Rental Assistance
46	MUST Ministries, Inc Tenant Based Rental Assistance
47	The Salvation Army, A Georgia Corporation- Tenant Based Rental Assistance
48	Zion Keepers, Inc Tenant Based Rental Assistance
	ESG Program Activities
49	Cobb County ESG Program Office Administration
50	The Center for Family Resources, Inc Shelter Operations - Emergency Shelter
51	liveSAFE Resources, Inc Shelter Operations - Domestic Violence Shelter

52	MUST Ministries, Inc Shelter Operations - Emergency Shelter
53	Society of Saint Vincent De Paul - Shelter Operations - House of Dreams for Women
54	The Extension, Inc Shelter Operations - Shelter Program & Operations for Men's Shelter
55	Davis Direction Foundation, Inc Street Outreach
56	Latin American Association, Inc Homelessness Prevention
57	The Salvation Army Marietta Corps - Homelessness Prevention
58	Zion Baptist Church - Homelessness Prevention
59	Zion Keepers, Inc Homeless Prevention

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

Cobb County receives entitlement program funds directly from HUD. The County allocates a "fair share percentage" of CDBG program funds to the Cities of Acworth, Austell, Kennesaw, and Powder Springs. The City of Smyrna is an entitlement jurisdiction, and therefore, receives a direct allocation from HUD. This entitlement jurisdiction has entered into a Cooperation Agreement with Cobb County to administer its CDBG program funds. The Georgia Urban County Consortium (GUCC) consists of two participating jurisdictions, Cobb County (the lead agency) and the City of Roswell. The City of Roswell has entered a joint agreement with Cobb County to receive HOME grant funds from HUD. The GUCC participating jurisdictions receive funding allocations based on the Annual Consortia Percentage Report produced by HUD.

Based on 2020 American Community Survey (ACS) Census data, Cobb County has experienced an increase in its racial/ethnic composition. The African-American population increased between 2010 and 2020 rising from 171,774 residents in 2010 to 224,849 in 2020. The 2020 ACS Census data shows that African Americans comprised 29.7% percent of all Cobb County residents. There is a large percentage of African American residents in the Southern portion of the County with concentrations in the cities of Marietta and Smyrna. In 2010, the Asian population in Cobb County totaled 30,657 and rose to 48,244 in 2020. The 2020 ACS Census data reported that the Asian population comprised 6.4% of Cobb County residents and is concentrated primarily in the northeastern portion of the County. The Hispanic population increased from 84,330 residents in 2010 to 98,637 residents in 2020. The 2020 ACS Census data reported that the Hispanic population comprised 13% of Cobb County residents and is concentrated primarily in the cities of Marietta and Smyrna. Assistance will be provided throughout low-income Cobb County Census tracts and directly to low and moderate-income residents.

Geographic Distribution

Target Area	Percentage of Funds	
County-Wide	80%*	

Table 2 - Geographic Distribution

^{*}Remaining 20% of CDBG funds will be allocated for eligible CDBG administrative activities.

Rationale for the priorities for allocating investments geographically

Discussion

Cobb County is an urban county covering over 340 square miles which causes the low and moderate- income population to be less concentrated as in most centralized cities. The County relies on widely accepted data such as American Community Survey, HUD's low and moderate-income summary data, and Federal Financial Institutions Examinations Council's (FFIEC) data to determine areas throughout the community with concentrations of low and moderate-income communities. Program resources are allocated County-wide based on low-mod areas which often coincide with areas of minority concentration.

Kennesaw

Mantetis

Vising
Splings

Low-Mod Block Groups

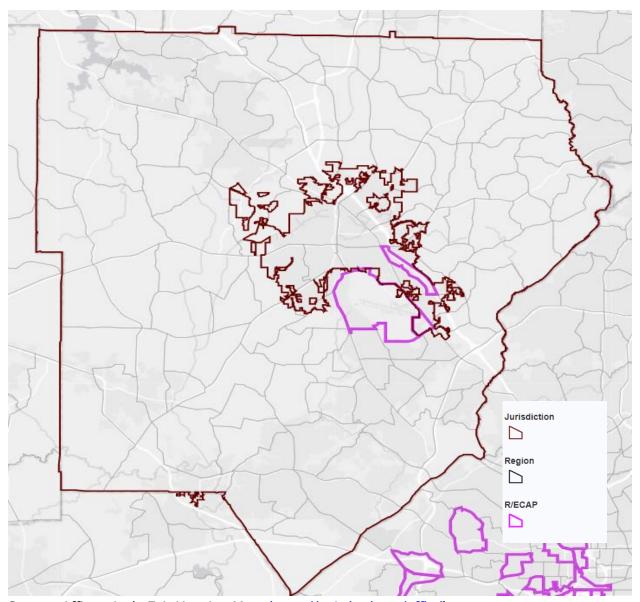
Map 1: Cobb County Low and Moderate-Income by Census Tracts

(Source: HUD CPD Mapping Tool; https://eqis.hud.gov/cpdmaps/)

The low and moderate-income census tracts in Cobb County are located in the central, eastern and southern portions of the County which also coincide with areas of minority concentrations

throughout the county. These Census Tracts are defined as low and moderate-income areas based on HUD's determination.

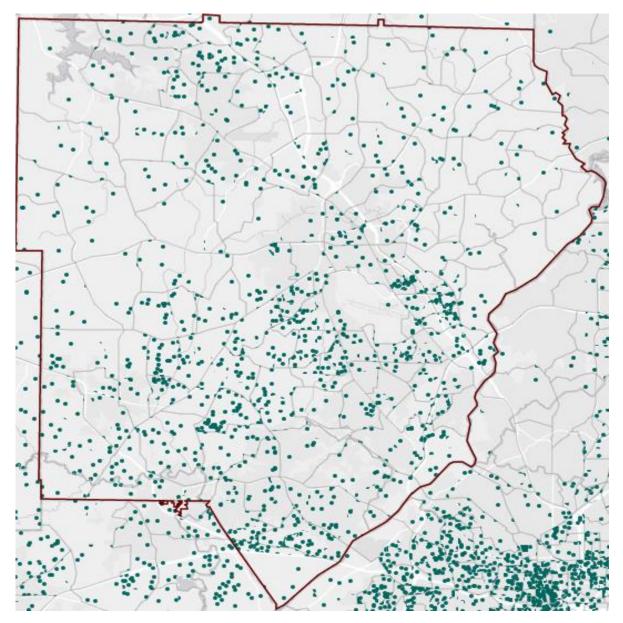
Map 2: Cobb County Racially and Ethnically Concentrated Areas of Poverty



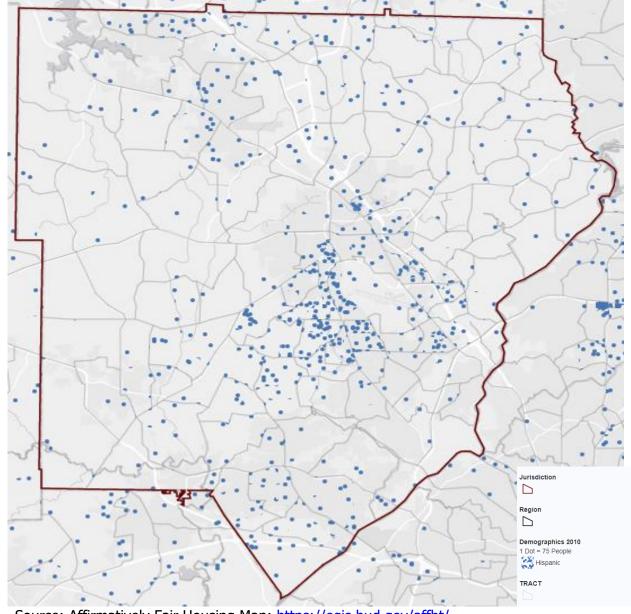
Source: Affirmatively Fair Housing Map; https://egis.hud.gov/affht/)

According to the HUD Affirmatively Further Fair Housing (AFFH) map, Cobb County has two (2) racially and ethnically concentrated areas of poverty which includes significant African American population at 44.5%. Census Tract Block Groups 2 and 3 have a racial and ethnic concentration greater than 50%. Census Tract 0310.01 Block Group 2 has a racial and ethnic concentration greater than 50%. Census Tract 0311.3 Block Group 1 has a racial and ethnic concentration greater than 50%.

Map 3: Cobb County Areas of African American Concentrations



Source: Affirmatively Fair Housing Map; https://egis.hud.gov/affht/



Map 4: Cobb County Areas of Hispanic Concentrations

Source: Affirmatively Fair Housing Map; https://egis.hud.gov/affht/

Affordable Housing

AP-55 Affordable Housing - 91.220(g)

Introduction

One Year Goals for the Number of Households to be Supported	
Homeless	100
Non-Homeless	25
Special-Needs	10
Total	135

TABLE 3 - ONE YEAR GOALS FOR AFFORDABLE HOUSING BY SUPPORT REQUIREMENT

One Year Goals for the Number of Households Supported Through		
Rental Assistance	150	
The Production of New Units	15	
Rehab of Existing Units	10	
Acquisition of Existing Units	5	
Total	180	

TABLE 4 - ONE YEAR GOALS FOR AFFORDABLE HOUSING BY SUPPORT TYPE

AP-60 Public Housing - 91.220(h)

Introduction

Cobb County will assist Marietta Housing Authority in addressing the needs of public housing residents by offering down-payment assistance programs to eligible residents of public housing.

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

Marietta Housing Authority (MHA) is the public housing authority for the County and administers subsidized units. MHA also manages a down-payment assistance program to assist low and moderate-income residents. The MHA Plan describes efforts to encourage public housing residents to become more involved in the community and to participate in various homeownership opportunities. MHA plans to initiate new programs to increase revenues for the agency and provide economic opportunities for low income families.

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

MHA provides multiple outlets for public housing residents to be involved. Public housing residents (each adult family member) must contribute eight hours per month of community service and participate in an economic self-sufficiency program. With the economic self-sufficiency program in place, MHA encourages its residents to participate in activities that promote the level of economic stability that could lead to homeownership.

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

According to HUD's Public Housing Agency Score (PHAS), the Marietta Housing Authority scored an 88 and is designated a standard performer and is not considered by HUD to be troubled or poorly performing.

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

The County partners with the local CoC, which is led by the **Center for Family Resources**, to address homelessness and the priority needs of homeless individuals and families, including homeless subpopulations. The County has implemented a Homeless Management Information System (HMIS) database to track the effectiveness of service providers. This system provides information on services provide to eligible clients by local non-profit organizations in the County.

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

Cobb County has identified the following goals to reduce and/or eliminate homelessness.

- 1. Provide funds (subject to applicable cap) to support emergency shelter operations, homeless prevention, rapid re-housing and supportive services.
- 2. Provide support for the development and operation of transitional housing throughout Cobb County as individuals and families work towards self-sufficiency.
- 3. Encourage the efficient use of HMIS technology and support its expansions beyond homeless service providers as a way to link the various services provided by Cobb County non-profit organizations and standardize performance measures.
- 4. Support efforts to integrate the management of ESG funds with the Continuum of Care.
- 5. Provide support for services that prevent persons released from institutions from becoming homeless.
- 6. Strengthen the collaboration and capacity of homelessness service providers and advocacy organizations.

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

Cobb County will continue to support organizations that assess the needs of the homeless to create a more robust social service system to address unmet needs. ESG, CSBG and CDBG funding are provided to social service organizations to assess the needs of homeless persons. In PY2022, Cobb County funded the Center for Family Resources, Inc., the Center for Children and Young Adults, Inc., The Extension, Inc., Ser Familia, Inc., Family Promise of Cobb County, MUST Ministries, Inc., Latin American Association, Inc., and Zion Keepers, Inc. to provide services for the homeless and at-risk of homelessness population. The Marietta/Cobb **Continuum of Care** collaborates with non-profit organizations to analyze existing needs to assist in identifying funding gaps and other gaps in services. The Homeless Point in Time Count, organized by the Continuum of Care, annually assesses the characteristics of the homeless population in Cobb County. This data allows the Continuum and the County to track the changing needs of the homeless. In PY2023, the County will continue support the efforts of the Continuum of Care in the preparation of the Point in Time Count. Consolidated Plan. Cobb County will continue to invest in emergency shelter activities during the Action Plan period and has identified the following organizations that will provide emergency shelter for homeless persons residing in Cobb County.

MUST Ministries provides immediate needs (food, clothing, shelter) and long terms needs (employment assistance, support groups, educational assistance) to homeless persons in the

county. They also operate a community kitchen which operates 365 days per year and serves nearly 80,000 meals a year. **The Center for Family Resources** provides services for homeless and at-risk persons residing in the county through direct financial assistance, affordable housing programs, education and employment assistance, and mentoring.

The Extension operates a long-term community supported residential treatment facility for homeless men who are chemically dependent. This program addresses one of the root causes of homelessness and provides its participants with an opportunity to reintegrate into society as sober, productive, and responsible citizens.

Family Promise of Cobb County assists homeless families with children with emergency shelter, mentoring, and practical life skills coaching so that their clients can achieve a greater level of self-respect, dignity and independence.

Addressing the emergency shelter and transitional housing needs of homeless persons

The County provides ESG and CSBG funding for essential services and operations to emergency shelters and transitional housing facilities. These facilities provide shelter and services to citizens of Cobb County to include homeless families, single men and women, and victims of domestic violence. The County supports increasing housing options and self-sufficiency for the homeless and near homeless by providing support for the following:

- Emergency housing and supportive services for homeless families and individuals;
- Developing transitional housing; and
- Preventing persons released from institutions from entering homelessness.

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

The County will administer the Emergency Solutions Grant Program and oversee activities for homeless individuals and families in Cobb County. According to the most recent Point in Time Count (PIT) of homeless persons in Cobb County conducted on February 23, 2022, 252 persons were sleeping in either emergency or transitional shelters; and 109 persons were unsheltered. Cobb County encourages collaboration with organizations to transition as many people as possible into permanent housing. The County also supports the implementation of, Coordinated Entry, a referral and case management system with the tools to direct the homeless to appropriate housing and services. Some families or individuals may require only limited assistance for a short period of time, such as emergency food and shelter, until a first paycheck is received, or a medical emergency has past. Others however, will require more comprehensive and long-term assistance, such as transitional housing with supportive services and job training. Due to limited resources, it is important for agencies to eliminate duplication of effort by local agencies, both in intake and assessment procedures, and in subsequent housing and supportive services. The Homeless Management Information System (HMIS) can be improved with common intake forms, shared

data, effective assessment instruments and procedures, and on-going coordination of assistance among community organizations.

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

The County will administer the Emergency Solutions Grant Program (ESG) and coordinate activities to prevent individuals and families from becoming homeless and to assist individuals/families regain stability in current housing or permanent housing. ESG program funds will be used for homelessness prevention which includes housing relocation and stabilization services and for short term (up to 3 months) or medium term (up to 24 months) rental assistance. A range of emergency shelter facilities and short-term services (food, clothing, and temporary financial assistance, transportation assistance) to meet a variety of Consolidated Plan family or individual circumstances is necessary to assist families in preventing homelessness.

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

The County's 2020 Analysis of Impediments to Fair Housing Choice (AI) examined a number of areas in which barriers to the development of affordable housing might exist. Barriers identified in the Plan include:

IMPEDIMENT 1: LACK OF AFFORDABLE HOUSING

Strategies: In order to address the need and achieve the goal for more affordable housing, the following activities and strategies should be undertaken:

- Continue to promote the need for affordable housing by supporting and encouraging private developers and non-profits to develop, construct, and/or rehabilitate housing that is affordable.
- Encourage and promote the development, construction, and/or rehabilitation of mixedincome housing throughout the County.
- Support financially, the rehabilitation of existing housing owned by seniors and lowerincome households to conserve the existing affordable housing stock in the County.
- Provide financial and development incentives to private developers and non-profits to construct and/or rehabilitate affordable housing.

IMPEDIMENT 2: LACK OF ACCESSIBLE HOUSING

Strategies: In order to address the need and achieve the goal for more accessible housing, the following activities and strategies should be undertaken:

- Continue to promote the need for accessible housing by supporting and encouraging private developers and non-profits to develop, construct, and/or rehabilitate housing that is accessible to persons who are disabled.
- Financially assist in improvements to single-family owner-occupied homes to make them accessible for the elderly and/or disabled so they can continue to remain in their homes.
- Encourage and promote the development of accessible housing units in multi-family buildings as a percentage of the total number of housing units.
- Encourage and financially support landlords to make reasonable accommodations to units in their building so persons who are disabled can continue to reside in their apartments.
- Enforce the Americans with Disabilities Act (ADA) and the Fair Housing Act (FHA) in regard to making new multi-family housing developments accessible and visitable for persons who are physically disabled.

IMPEDIMENT 3: BARRIERS LIMITING HOUSING CHOICE

Strategies: In order to achieve the goal for more housing choice, the following activities and strategies should be undertaken:

- Deconcentrate pockets of racial and ethnic poverty by providing affordable housing choices for persons and families who want to reside outside impacted areas.
- Support and promote the development of affordable housing in areas of opportunity where minority and low-income persons and families may reside.
- Promote and support the development of affordable housing for minorities and lowincome households who are being "forced out" of their homes and may not have housing resources to relocate.
- Support and promote sound planning principals and make revisions to land development and zoning ordinances to eliminate "exclusionary zoning," which restricts the development of affordable
- housing.

IMPEDIMENT 4: LACK OF FAIR HOUSING AWARENESS

Strategies: In order to address the need and achieve the goal of promoting open and fair housing, the following activities and strategies should be undertaken:

- Continue to educate and make residents aware of their rights under the Fair Housing Act (FHA) and the Americans with Disabilities Act (ADA).
- Continue to monitor the data from the Home Mortgage Disclosure Act (HMDA) to ensure that discriminatory practices in home mortgage lending is not taking place.
- Publish and distribute housing information and applications in both English and Spanish to address the increase in Limited English Proficiency residents in Cobb County.
- Educate residents and local officials to eliminate neighborhood misconceptions and combat "NIMBYism."

AP-85 Other Actions – 91.220(k)

The Consolidated Plan addresses the issue of meeting underserved needs of Cobb County residents through a variety of initiatives. Several of these initiatives are proposed for funding in this Annual Action Plan. However, the primary obstacle to alleviating these needs is a lack of funding.

Actions planned to address obstacles to meeting underserved needs

To help remove obstacles to meeting underserved needs and improve service delivery, Cobb County will support the expansion of HMIS technology beyond homeless service providers as a way to link the various categories of services provided by Cobb County nonprofits organizations and standardize performance measures. Cobb County will also review and analyze the work of its various departments and divisions to find opportunities for collaboration between similar programs.

Actions planned to foster and maintain affordable housing

Affordable housing will be maintained and encouraged by the coordination and collaboration among the non-profit housing developers in the community such as **Cole Street Development Corporation**, **City of Roswell**, and **Habitat for Humanity of Northwest Metro Atlanta**, **Inc.** The County will also continue to support the use of HOME program funds for down-payment assistance for low and moderate-income homebuyers. Additionally, the County will continue to use HOME and CDBG program funds to rehabilitate owner-occupied homes. In an effort to promote affordable housing and fair housing choice, the County will encourage and support fair housing rights for all and provide program funds to conduct outreach and education regarding the Fair Housing Act of 1968.

Actions planned to reduce lead-based paint hazards

In PY2023, Cobb County will continue to implement counter-measures to reduce lead-based paint hazards by abating or removing lead-based paint hazards found in existing housing built prior to 1978. Cobb County educates the public on the hazards of lead-based paint and educates parents about protecting their children. In response to lead-based paint hazards and the limited resources available, the County has planned a steady, long-term response in accordance with Federal lead-based paint standards, other applicable federal regulations, and local property standards. The County will identify houses with lead-based paint through the various housing programs undertaken by the County and will abate or remove lead hazards in high priority units. Government assisted housing rehabilitation projects will include the completion of a lead-based paint inspection according to HUD and Environmental Protection Agency (EPA) guidelines. Policies and procedures for abatement of lead hazards have been established in Cobb County, which include determining cost effectiveness for abatement and procedures for assessing, contracting

and inspecting post-abatement work. The policies and procedures also include preparing work write-ups and costs estimates for all income eligible persons in Cobb County with identified lead-based paint hazards.

Actions planned to reduce the number of poverty-level families

Cobb County will continue efforts to implement anti-poverty strategies for the citizens of Cobb County in the upcoming year. The County will strive to increase its efforts in assisting homeowners and renters with housing rehabilitation and renovation of affordable housing to decrease the financial burden on low-to-moderate-income persons.

The County will provide assistance to low and moderate-income persons through the following strategies:

- Provide homeowners with housing repair assistance through the Housing Rehabilitation program;
- Provide nonprofit organizations such as Marietta Housing Authority and Habitat for Humanity of Northwest Metro Atlanta, Inc. with down payment assistance for firsttime home buyers;
- Provide assistance to the City of Roswell's CHDO to acquire and construct affordable housing for low-income families;
- Provide assistance to the County's CHDO, Cole Street Development Corporation, to acquire and construct affordable rental housing for seniors;
- Provide assistance to nonprofit organizations such as the Center for Family Resources, Inc. and CobbWorks, Inc. to expand job training services; and
- The County will continue enforce Section 3 Policy as necessary. The County will encourage nonprofit organizations to expand housing development programs to incorporate job-training opportunities as a part of their operations;
- Through the initiatives described above, and in cooperation with the agencies and nonprofit organizations noted, the CDBG Program Office will continue to assist low and moderate-income persons of Cobb County over the next year.

Actions planned to develop institutional structure

The Cobb County CDBG Program Office administers all facets of the HUD grants for Cobb County to ensure that all aspects of the grant programs are performed in a concerted manner. The CDBG Program Office recognizes the need to maintain a high level of coordination on projects involving other County departments and/or non-profit organizations. This collaboration guarantees an efficient use of resources with maximum output in the form of accomplishments.

The **CDBG Program Office** will address gaps and improve institutional structure by using the following strategies:

- Reduce and/or alleviate any gaps in services and expedite the delivery of housing and community development improvements to eligible persons.
- Evaluate the procurement process and guidelines for all rehabilitation and construction projects.
- Coordinate projects among County departments and support ongoing efforts for County initiatives.
- Maintain a strong working relationship with the Marietta Housing Authority based on the mutually shared goal of providing suitable housing for low- and extremely lowincome persons.
- Work with and financially support community housing development organizations (CHDOs) operating in low and moderate-income neighborhoods to build affordable housing for the elderly, veterans and other special needs populations.
- Use established lines of communication to identify opportunities for joint ventures with agencies that provide funding to construct affordable housing and/or finance homeownership opportunities.

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

Cobb County will continue to work with a broad cross-section of public, private, faith-based, and community organizations to identify the needs of its citizens. The Cobb County CDBG Program Office works with the **Cobb Community Collaborative**, a community organization focused on providing more streamlined approach among Cobb County public service agencies to improve the lives of all persons in Cobb County. The Collaborative addresses a broad range of needs for families including homelessness, public safety, workforce development, literacy, and allocation of other resources. The creation of such an entity has allowed local non-profit organizations to focus their efforts collectively and to avoid duplication of services within the County. The Collaborative's efforts are critical to the success of the County's Consolidated Plan and Annual Action Plan. The Cobb Collaborative established a Business Advisory Council to connect local nonprofit organizations with members of the Cobb County Chamber of Commerce to match critical agency needs with resources available from local committed business partners.

Additionally, the **Policy Council on Homelessness** is comprised of member agencies (such as the **Center for Family Resources**, **Boys & Girls Club**, and **The Edge Connection**) that provide services to the homeless and very low-income persons. The Policy Council on

Homelessness has conducted surveys of the homeless and at-risk populations to determine needs in Cobb County and to plan appropriate programs and services in response to these needs.

The Cobb County CDBG Program Office also coordinates the five-year Consolidated Plan and Annual Action Plan in accordance with the Continuum of Care (CoC) program. The Center for Family Resources serves as the Lead Agency for the CoC and operates the supportive housing program for Cobb County. This cooperative effort provides a special focus through a diverse group of community organizations, homeless shelters, permanent affordable housing developers, supportive service providers, and target population groups to examine needs, re-establish priorities, and plan strategies. Through this collaborative process, housing and service providers were able to contribute ideas and strategies to the development of this Annual Action Plan.

Cobb County will also collaborate with the Cobb County Board of Health to serve on the City of Atlanta's HIV Planning Council. This organization serves as the vehicle for strategic planning and coordinating for the Housing Opportunities for Persons with AIDS (HOPWA) Program. The Cobb County Health Department coordinates with the City of Atlanta to develop a city-wide strategy in the preparation and implementation of the HOPWA Program. Low to moderate-income clients receive referrals from County Health Clinics, the Good Samaritan Health Center of Cobb and Sweetwater Valley Camp.

Program Specific Requirements

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

Introduction:

The Strategic Plan addresses the issue of meeting underserved needs through a variety of initiatives. Several of these initiatives are proposed for funding in this Annual Plan. As has been the situation in the past and most likely in the future the primary obstacle to these actions is a lack of funding.

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		
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		
3. The amount of surplus funds from urban renewal settlements		
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.		
5. The amount of income from float-funded activities		
Total Program Income		
Other CDBG Requirements		
1. The amount of urgent need activities	\$0	

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:

Cobb County will utilize investment of HOME program funds as designated in CFR part 92.205(b). The County will provide HOME Program funds to the **Habitat for Humanity of Northwest Metro Atlanta** and the **Marietta Housing Authority** for down-payment assistance loans to low and moderate-income homebuyers. The loans will be provided as "soft-second" mortgages, secured with a lien on the approved property. The Down-Payment Assistance Loans are repaid monthly by homeowners to **Habitat for Humanity of Northwest Metro Atlanta** and annually to the County, and the program income derived is used by the County for other eligible HOME program activities.

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 HOME rule at §92.254(a)(5) establishes the resale and recapture requirements HOME grantees must use for all homebuyer activities. These provisions are imposed for the duration of the period of affordability on all HOME-assisted homebuyer projects through a written agreement with the homebuyer, and enforced via lien, deed restrictions, or covenants running with the land. The resale or recapture provisions are triggered by any transfer of title, either voluntary or involuntary, during the established HOME period of affordability.

When undertaking HOME-assisted homebuyer activities, including projects funded with HOME program income, the County must establish resale or recapture provisions that comply with HOME statutory and regulatory requirements and set forth the provisions in its Consolidated Plan. HUD must determine that the provisions are appropriate. The written resale/recapture provisions that the County submits in its Annual Action Plan must clearly describe the terms of the resale/recapture provisions, the specific circumstances under which these provisions will be used, and how the County will enforce the provisions.

Note: Cobb County's complete Resale and Recapture provisions are included as an appendix. Below is a summary of applicable portions of the provisions.

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:

The County's resale and recapture provisions ensure the affordability of units acquired with home funds in several ways.

The HOME rule at §92.254(a)(4) establishes the period of affordability for all homebuyer housing. The County's calculation for the period of affordability is based upon the amount of HOME assistance in each unit and the applicable period of affordability under resale or

recapture provisions.

a. Period of Affordability Under Resale Provisions

Under resale, §92.254(a) (5) (i) the HOME rule states that the period of affordability is based on the total amount of HOME funds invested in the housing. In other words, the total HOME funds expended for the unit determines the applicable affordability period. Any HOME program income used to assist the project is included when determining the period of affordability under a resale provision.

b. Period of Affordability Under Recapture Provisions

For HOME-assisted homebuyer units under the recapture option, the period of affordability is based upon the HOME-funded direct subsidy provided to the homebuyer that enabled the homebuyer to purchase the unit. Any HOME program income used to provide direct assistance to the homebuyer is included when determining the period of affordability.

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:

The County does not anticipate refinancing any existing debt with its HOME funds during this Consolidated Plan period.

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

Include written standards for providing ESG assistance (may include as attachment)
Cobb County will focus on the following eligible populations that can be assisted with ESG
funds: persons at risk of becoming homeless and persons who are homeless. Even though
these are the targeted populations, it is important to give assistance to those who are in the
most need of funds.

Eligibility for Assistance

Each individual or family who is receiving assistance must first meet with case manager or intake personnel who can determine the appropriate type of assistance to meet their needs. The household must be at or below 30% of Area Median Income (AMI). Assets are counted for determining AMI eligibility. AMI is prospective and only counts income generated at that particular time. The household must be either homeless or at risk of losing its housing and meet both of the following circumstances: (1) no appropriate subsequent housing options have been identified; and (2) the household lacks the financial resources and support networks needed to obtain immediate housing or remain in its existing housing.

Staff Certification of Eligibility for Assistance

Cobb County will continue to use the Staff Certification of Eligibility for Assistance. The certification serves as documentation that the household meets all eligibility criteria for assistance, certifies that true and complete information was used to determine eligibility, and certifies that no conflict of interest exists related to the provision of ESG assistance. Each staff person determining ESG eligibility for a household must complete this Staff Certification of

Eligibility for every household, once the household is determined eligible for ESG assistance. The completed Staff Affidavit remains valid until a different staff person re-determines ESG eligibility. ESG Staff Certifications of Eligibility must be signed and dated by ESG staff and supervisors for each household approved for ESG assistance.

Homelessness Prevention Assistance

Although there are minimum requirements, HUD encourages grantees and subrecipients to target prevention assistance to individuals and families at the greatest risk of becoming homeless.

The target population for Cobb County will have the following risk factors:

- Eviction within two weeks from a private dwelling
- Sudden and significant loss of income
- Severe house cost burden (greater than 50% of income for housing costs)
- Pending rental housing foreclosure
- Credit problems that preclude obtaining housing

Rapid Re-Housing Assistance:

Rapid re-housing assistance is available for persons who are homeless according to HUD's definition of homeless.

- The target population for Cobb County rapid re-housing will have the following risk factors:
- Individual or family who lacks a fixed, regular, and adequate nighttime residence, meaning:
- Has a primary nighttime residence that is a public or private place not meant for human habitation;
- Is living in a publicly or privately operated shelter designated to provide temporary living arrangements (including congregate shelters, transitional housing, and hotels and motels paid for by charitable organizations or by federal, state and local government programs)
- Is exiting an institution where an individual has resided for 90 days or less and who resided in an emergency shelter or place not meant for human habitation immediately before entering that institution.

The purpose of these funds is to assist eligible program participants to move into permanent housing and achieve housing stability. Therefore, Cobb County subrecipients providing assistance will utilize a process to assess the level of service needed for all potential program participants, other resources available to them, and the appropriateness of their participation in the rapid re-housing assistance portion of ESG. Program participants who require longer-term housing assistance and services should be directed to agencies that can provide the

requisite services and financial assistance.

Coordination

Cobb County will coordinate with the Continuum of Care (CoC) by attending and participating in the bi-monthly Continuum of Care meetings and monthly steering committee for the CoC. The Continuum includes several emergency shelter providers, essential service providers, homeless prevention and rapid re-housing assistance providers, other homeless assistance providers, mainstream service, and housing providers. In addition to bi-monthly meetings, there are several committees that also meet on a monthly basis to coordinate and establish policies. These committees include the Policy Council on Homelessness, and the CoC steering committee..

Determining and prioritizing eligibility

The County and its providers within the Continuum recognize that individuals and households must be prioritized to ensure that funding is distributed to best serve the needs of those who are homeless or at-risk of becoming homeless.

Subrecipients will perform intake and evaluate each individual and household on a case-by-case basis. They recognize that each case is different, and that the demographics throughout the county are so different so as to not be able approach potential clients with a "one size fits all strategy." To best prioritize those who are homeless or at risk of becoming homeless for rapid re-housing or homeless prevention funds, those who are at-risk of becoming homeless will need to show that they will become homeless if they do not receive ESG Homeless Prevention funds, and they must have also suffered an economic hardship to become at risk of losing their home.

Subrecipients may choose to prioritize homeless individuals and households who have been involved with their particular program for Rapid Re-housing assistance, although each individual and household will be evaluated before being able to receive funding.

In addition to the household income being below 30% AMI and the household currently experiencing homelessness or being at imminent risk of becoming homeless, there must be documented evidence in the client files that determine:

- There is a lack of financial resources.
- There are no other housing options.
- There are no support networks.

Client share of rent and utilities costs

When a provider determines that a household is a priority for either Homeless Prevention or Rapid Re-housing rental assistance, they will be eligible to receive up to 100% rental assistance for no more than the full amount of the rent, as stated on the lease.

Short Term and Medium-Term Rental Assistance Duration

The County will require short-term and medium-term rental assistance to allow individuals

and families to remain in their existing rental units or to help them obtain and remain in rental units they select. A lease must be in place in the program participants name for them to receive assistance.

Short-term rental assistance can only be used for three (3) months while medium-term rental assistance ranges from four (4) to 24 months. No program participant may receive more than 24 months of assistance under ESG, and each program participant must be evaluated every three (3) months to determine the amount of assistance needed.

Rental assistance may also be used to pay up to six (6) months of rental arrears for eligible program participants; however the six (6) months count towards the 24 month total. The rental assistance paid cannot exceed the actual rental cost, which must be in compliance with HUD's standard of "rent reasonableness." This means that the total rent charged for a unit must be reasonable in relation to the rents being charged during the same time period for comparable units in the private unassisted market and must not be in excess of rents being charged by the owner during the same time period for comparable non-luxury unassisted units.

Rental assistance payments cannot be made on behalf of eligible individuals or families for the same period of time and for the same cost types that are being provided through another federal, state or local housing subsidy program. Cost types are the categories of eligible HPRP financial assistance: rent from the client portion or the subsidy; security deposits, utility deposits, utility payments, moving cost assistance, and hotel/motel vouchers.

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

The Continuum of Care will implement a formally developed a coordinated assessment system incorporating ESG in 2023 with a committee of homeless service providers and a subcommittee to develop an outreach and intake system.

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 CDBG Program Office publishes a notification of funding in the Marietta Daily Journal, the local newspaper, to announce the availability of program funds. Application notices are also emailed to the CDBG Program Office's wide network of stakeholders and posted on the Cobb County CDBG Program office website for organizations to download and apply for funding. These applications are then reviewed by an applications committee for conformance with the program requirements, qualifications of applicants, availability of matching funds, and other factors. The applications committee makes recommendations to the Cobb County Board of Commissioners for final approval of funding allocations.

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.

The CDBG Program Office requires subrecipient organizations to include homeless or formerly homeless individuals on the Board of Directors or other equivalent policymaking entity. Non-profit organizations recommended for funding have procedures in place for homeless or formerly homeless persons to be involved with the program design and implementation.

5. Describe performance standards for evaluating ESG.

In consultation with the Cobb County Continuum of Care, the County will continue to use performance standards to measure the effectiveness at targeting those who need the assistance most. The following performance measures have been identified:

- Reduction in the number of people living on the streets or emergency shelters;
- Reduction in housing barriers and housing stability risks;
- Reduction in the number of individuals and families who become homeless;
- The percent of persons exiting the shelter where the destination is known;
- The percent of persons who exited to permanent housing for each component;
- Reduction in the number of people entering emergency shelters;
- Reduction in recidivism in shelters of persons that have already been housed; and
- Increased income and employment rates for rapid-re-housing clients.