

# PY 2022 Consolidated Annual Performance & Evaluation Report (CAPER)

### **DRAFT**

#### **Lower Savannah Council of Governments**

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#### **CR-05 - Goals and Outcomes**

#### Progress the jurisdiction has made in carrying out its strategic plan and its action plan. 91.520(a)

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

Orangeburg County is the lead entity for the HOME Consortium and is the direct recipient of HOME funds. The Lower Savannah Council of Governments (LSCOG) administers the Consortium on the County's behalf. The Consortium currently has two certified CHDOs, Southern Carolina Regional and New America Corporation, which help with development of affordable housing in the region. The Consortium also works closely with the Edisto Habitat for Humanity on new affordable housing construction projects. In PY 2022, the HOME Consortium did not complete any affordable housing developments, however the following summary details the progress of each activity by priority.

Homebuyer Opportunity: The Consortium continues to prioritize expanding the area's affordable housing stock through homeowner housing constructed by Edisto Habitat for Humanity for LMI households. For this activity, material costs are provided for Habitat to build housing in the area. Eligible households must earn 80% or less of area median income (AMI). There is one open activity (#155, 1121 Kings Rd, Orangeburg SC) Habitat is currently working on, and the Consortium anticipates it will be completed in the upcoming program year. HOME accomplishments are only reported in the CAPER once an activity has been completed.

Homeowner Rehab: The Consortium works to preserve and expand the area's affordable housing stock through housing rehab with the objective of providing decent housing through grants to low and moderate income (LMI) households. There were no units completed in PY 2022, however the Consortium will continue to prioritize this need and identify more LMI households in the future.

Rental Construction and Acquisition/Rehab: In PY 2022 there were no new rental unit construction or rehabs completed. The Consortium is currently working with the New America Corporation on the construction of a new four-unit affordable rental housing project called Peasley Townhomes, located at 883 Peasley St., Orangeburg, SC. The four units will be available for households earning 80% or less of the AMI. The Consortium will maintain the affordability for units through the use of deed restrictions. The units will be required to be affordable for a minimum of 20 years.

Affirmatively Further Fair Housing: As part of the administrative duties of HOME Consortium staff, fair housing information was given out on discrimination, fair housing and where to go for help in the region. The Consortium sent flyers and information to all 28 Consortium members to distribute to their residents.

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

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

Goal	Category	Source	Indicator	Unit of Measure	Expected  - Strategic Plan	Actual – Strategic Plan	Percent Complete	Expected - Program Year	Actual – Program Year	Percent Complete
1A Provide Homebuyer Opportunities	Affordable Housing	НОМЕ	Homeowner Housing Added	Household Housing Unit	20	1	5.00%	4	0	0.00%
1B Increase & Improve the Supply of Rental Housing	Affordable Housing	НОМЕ	Rental units constructed	Household Housing Unit	15	6	40.00%	3	0	0.00%
2A Assist Homeowners with Needed Housing Repairs	Affordable Housing	НОМЕ	Homeowner Housing Rehabilitated	Household Housing Unit	20	4	20.00%	4	0	0.00%
3A Increase Capacity of Local Housing Providers	Affordable Housing	НОМЕ	Other	Other	1	1	100.00%	1	1	100.00%

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

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

HOME funds in the region are used for homeowner housing construction, owner-occupied rehab, and affordable rental housing construction and rehab projects. Low to moderate income (LMI) citizens located in the Consortium greatly benefit from affordable housing construction and owner rehabilitation programs. There is also a high need for affordable rental housing in the region. By working with housing providers such as Habitat

for Humanity and the CHDOs, the Consortium's goal is to increase the affordable housing stock in the area.

As part the HOME program's administrative activities, Consortium staff disseminate information on fair housing throughout the year. Each year the Consortium sends flyers and information to hand out to all 28 Consortium members, including information on discrimination, fair housing laws and service providers that can offer assistance.

PY 2022 Goals to PR-23 Summary of Accomplishments Comparison

1A Provide Homebuyer Opportunities: There was a goal for four units to be completed however none were completed. While this goal was not completed there is one ongoing activity (#155, 1121 Kings Rd). The Consortium will continue to identify potential projects that will provide homebuyer opportunities.

1B Increase & Improve the Supply of Rental Housing: There was a goal for three units to be completed, however none were completed. The Consortium is currently working with its CHDO, New America Corporation, on the construction of a new four-unit affordable rental housing project called Peasley Townhomes, located at 883 Peasley St., Orangeburg, SC. At this time, the development has not been completed and the accomplishments will be reported in the next CAPER.

2A Assist Homeowners with Needed Housing Repairs: There was a goal for four units to be completed and there were no units completed. The Consortium will continue to identify households in need of this service.

3A Increase Capacity of Local Housing Providers: There was a goal for one CHDO to be assisted and this was completed. CHDO New America Corporation has been funded and is working on the Peasley Townhomes, a new four-unit rental housing construction project for LMI renters.

#### CR-10 - Racial and Ethnic composition of families assisted

Describe the families assisted (including the racial and ethnic status of families assisted). 91.520(a)

	HOME
White	0
Black or African American	0
Asian	0
American Indian or American Native	0
Native Hawaiian or Other Pacific Islander	0
Total	0
Hispanic	0
Not Hispanic	0

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

#### Narrative

The Consortium is currently working on one new homebuyer construction with Habitat for Humanity and a new rental development with 4 units by New American Corporation (CHDO). Unfortunately, these are not yet completed, and the HOME program only reports on race and ethnicity when the projects are completed.

The Needs Assessment in the 2021-2025 Consolidated Plan, assesses if any racial/ethnic group by income category has a disproportionate need when compared to the jurisdiction as a whole in the area with regards to housing problems, severe housing problems and housing cost burden. As Black or African American Households make up a significant portion of the overall population, their housing needs do not diverge very far from the jurisdiction as a whole. In general, there is a need for affordable housing in the area and cost burden is by far the largest housing issue in the Lower Savannah region. As a result, Black or African American households are largely affected by the housing problems in the region.

Households with housing problems are identified as those that reside in units lacking complete kitchen and plumbing facilities, overcrowded housing (more than one person per room) and cost burden (spending 30% or more of income on housing per month). Households with severe housing problems are those that reside in units lacking complete kitchen and plumbing facilities as well as severely overcrowded homes (more than 1.5 person per room) and severe cost burden (spending 50% or more of income on housing per month).

There were a few other minority populations identified with housing problems across the lower income categories, however it should be noted the populations were very small. While the Consortium will continue take notice of all smaller minority groups in the area, it will continue to serve all LMI and minority groups based on individual need and income eligibility.

#### CR-15 - Resources and Investments 91.520(a)

#### Identify the resources made available

Source of Funds	Source	Resources Made Available	Amount Expended During Program Year
HOME	public - federal	1,199,888	0

Table 3 - Resources Made Available

#### **Narrative**

In PY 2022, \$1,199,888 in HOME funds were made available through the annual allocation for affordable housing activities. In the program year the Consortium attempted to draw \$581,107.62 in IDIS however the vouchers were rejected. This was due to Orangeburg County, the Consortium lead entity, not having updated banking information in the Line of Credit Control System (LOCCS) in IDIS. The County and Consortium are currently working to reconcile this issue and will recreate these vouchers in the upcoming program year. While these vouchers will be processed as a PY 2023 expense, the expenditures were actually made in PY 2022. The following is a breakdown of these funds:

#159 Peasley Homes (New Rental Development, CHDO): \$450,000.00

#156 General Admin: \$131,107.62

Total HOME Expenditures (Rejected Vouchers that will be recreated and processed in PY 2023): \$581,107.62

#### Identify the geographic distribution and location of investments

Target Area	Planned Percentage	Actual Percentage of	Narrative Description
	of Allocation	Allocation	
Aiken County	N/A	N/A	Consortium Member
Allendale County	N/A	N/A	Consortium Member
Bamberg County	N/A	N/A	Consortium Member
Barnwell County	N/A	N/A	Consortium Member
Calhoun County	N/A	N/A	Consortium Member
City of Bamberg, SC	N/A	N/A	Consortium Member
City of Denmark, SC	N/A	N/A	Consortium Member
City of New Ellenton, SC	N/A	N/A	Consortium Member
City of North Augusta, SC	N/A	N/A	Consortium Member
City of Orangeburg, SC	N/A	N/A	Consortium Member
Orangeburg County	N/A	N/A	Consortium Member
Town of Allendale, SC	N/A	N/A	Consortium Member
Town of Blackville, SC	N/A	N/A	Consortium Member
Town of Cameron, SC	N/A	N/A	Consortium Member

Town of Ehrhardt, SC	N/A	N/A	Consortium Member
Town of Fairfax, SC	N/A	N/A	Consortium Member
Town of Neeses, SC	N/A	N/A	Consortium Member
Town of Perry, SC	N/A	N/A	Consortium Member
Town of Santee, SC	N/A	N/A	Consortium Member
Town of Snelling, SC	N/A	N/A	Consortium Member
Town of Ulmer, SC	N/A	N/A	Consortium Member
Town of Williston, SC	N/A	N/A	Consortium Member

Table 4 – Identify the geographic distribution and location of investments

#### Narrative

During PY 2022, the Consortium did not target any specific area. Preference was given to projects that directly benefit LMI residents. The Orangeburg County HOME Consortium includes the following jurisdictional members.

#### Member Counties:

- 1. Aiken County
- 2. Allendale County
- 3. Bamberg County
- 4. Calhoun County
- 5. Barnwell County
- 6. Orangeburg County

#### Member Municipalities that are not the counties:

- 1. Town of New Ellenton
- 2. Town of North Augusta
- 3. Town of Perry
- 4. Town of Allendale
- 5. Town of Fairfax
- 6. Town of Ulmer
- 7. City of Bamberg
- 8. Town of Denmark
- 9. Town of Ehrhardt
- 10. Town of Blackville
- 11. Town of Snelling
- 12. Town of Neeses
- 13. City of Orangeburg
- 14. Town of Cameron
- 15. Town of Santee

- 16. Town of Williston
- 17. City of Aiken
- 18. Town of Jackson
- 19. Town of St. Matthews
- 20. Town of North
- 21. Town of Holly Hill
- 22. City of Barnwell

#### Leveraging

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

The Consortium is predominantly made up of rural South Carolina counties and municipalities with very limited resources and/or options for providing housing assistance. There are no known direct reoccurring available funds within the six counties in the Lower Savannah region. Some funding sources are available through competitive programs within the state. Those sources include South Carolina state HOME funds through SC Housing, state CDBG funds through SC Department of Commerce, the South Carolina State Housing Trust Fund program, Neighborhood Initiative Program, USDA Rural Development Housing programs, Habitat for Humanity, low-income housing tax credits, private foundations, and donations of volunteer labor and materials.

Publicly owned land or property that were used to address the needs identified in the plan

Neither Orangeburg County nor the Lower Savannah Council of Governments utilized publicly owned land for development as part of the HOME program. HOME funds are directed towards LMI households at their residence or residential locations.

#### **HOME Match**

The Consortium has a 100% HOME Match Reduction for FY 2022 due to fiscal distress. This is confirmed on the PR33 HOME Matching Liability Report and by HUD in November 2022 at: https://www.hud.gov/program\_offices/comm\_planning/home/match/fy\_22\_match\_reductions

#### MBE/WBE Business Contracts

As a recipient of federal HOME funding, the Consortium encourages certified disadvantaged, minority, or women-owned small businesses to participate in procurement opportunities as they are available for the HOME program. There were no new contracts made in PY 2022.

#### **HOME Program Income**

As reported by the PR-09, there was no HOME program income (PI) at the start of the program year, and no PI was received or expended in the program year. No PI was expended on TBRA activities.

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

Table 5 – Fiscal Year Summary - HOME Match Report

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

Table 6 – Match Contribution for the Federal Fiscal Year

### **HOME MBE/WBE report**

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

Table 7 – Program Income

	Total	ſ	Minority Busin	ess Enterprises		White Non-
		Alaskan Native or American Indian	Asian or Pacific Islander	Black Non- Hispanic	Hispanic	Hispanic
Contracts						
Dollar						
Amount	0	0	0	0	0	0
Number	0	0	0	0	0	0
Sub-Contract	S	-		1		
Number	0	0	0	0	0	0
Dollar						
Amount	0	0	0	0	0	0
	Total	Women Business Enterprises	Male			
Contracts	_					
Dollar						
Amount	0	0	0			
Number	0	0	0			
Sub-Contract	s					
Number	0	0	0			
Dollar						
Δmount	1	n	Λ			

Amount 0 0 0 0

Table 8 - Minority Business and Women Business Enterprises

and the total amount of HOME funds in these rental properties assisted							
	Total	_	Minority Property Owners White Nor				
		Alaskan Native or American Indian	Asian or Pacific Islander	Black Non- Hispanic	Hispanic	Hispanic	
Number	0	0	0	0	0	0	
Dollar	0	0	0	0	0	0	

0 0 0 Table 9 – Minority Owners of Rental Property

**Relocation and Real Property Acquisition** – Indicate the number of persons displaced, the cost of relocation payments, the number of parcels acquired, and the cost of acquisition

Parcels Acquired	0	0
Businesses Displaced	0	0
Nonprofit Organizations		
Displaced	0	0
Households Temporarily		
Relocated, not Displaced	0	0

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

Table 10 – Relocation and Real Property Acquisition

#### CR-20 - Affordable Housing 91.520(b)

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

	One-Year Goal	Actual
Number of Homeless households to be		
provided affordable housing units	0	0
Number of Non-Homeless households to be		
provided affordable housing units	11	0
Number of Special-Needs households to be		
provided affordable housing units	0	0
Total	11	0

Table 11 – Number of Households

	One-Year Goal	Actual
Number of households supported through		
Rental Assistance	0	0
Number of households supported through		
The Production of New Units	7	0
Number of households supported through		
Rehab of Existing Units	4	0
Number of households supported through		
Acquisition of Existing Units	0	0
Total	11	0

Table 12 - Number of Households Supported

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

The following is a summary for the three affordable housing programs administered by the Consortium: Homeowner Rehab, Homebuyer Opportunity Program and Rental Development. There are some activities underway and in various stages of development, however HOME only reports accomplishments in the table above when they are completed.

Homeowner Rehab Program: Unfortunately in PY 2022 there were no owner-occupied housing rehab activities completed. The Consortium is still working to identify LMI households in need of this assistance. Eligible households are LMI (80% of below AMI). The maximum funding for homeowner rehabilitation is \$50,000 per unit. The program helps LMI households maintain their homes and avoid conditions that lead to housing instability or homelessness.

Homebuyer Program: The Consortium did not complete any new construction activities in the program year; however it is still continuing work on a new affordable housing unit with Habitat for Humanity (#155, 1121 Kings Rd, Orangeburg SC). Habitat is currently in the development phase of the project and the Consortium anticipates it will be completed in the upcoming program year. The Consortium helps pay for the materials for housing units developed by Habitat for Humanity.

Rental Development: In PY 2022 there were no new rental unit construction or rehabs completed; however, the Consortium is currently working with its CHDO, New America Corporation, on the construction of a new four-unit affordable rental housing project called Peasley Townhomes, located at 883 Peasley St., Orangeburg, SC. The four units will be available for households earning 80% or less of the AMI. The Consortium will continue to work closely with its CHDOs on rental development projects and help support them in meeting the established goals of each AAP.

#### Discuss how these outcomes will impact future annual action plans.

The Consortium will continue to support the program activities that yield the most success. With the upcoming planning year, the Consortium will continue to strive to assist more LMI households in achieving affordable decent housing through homeowner rehab, homebuyer assistance and rental project developments. There are a number of projects in various stages of development, and the Consortium anticipates reporting these in the upcoming program year. New development projects are also being identified, and the Consortium will continue to work to meet the needs of its LMI residents.

The Consortium will also continue to work with its partners such as Habitat for Humanity and the CHDOs (Southern Carolina Regional and New America Corporation) to complete current projects and identify new eligible households in need of affordable housing. The Consortium will continue to serve the people in most need in the six-county service area.

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

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

Table 13 - Number of Households Served

#### **Narrative Information**

There were no activities completed in PY 2022, however there are several activities underway and in various stages of development. HOME only reports accomplishments in this section when they are completed, and the Consortium anticipates several of these activities will be completed in the upcoming program year such as one new housing construction by Habitat for Humanity for a potential LMI homebuyer and a new rental housing development by CHDO New American Corporation which will create four affordable units for LMI renters.

#### Worst Case Needs

The Consortium does not exclude any eligible household when assisting with affordable housing programs in the six-county region. Households with "worst-case needs" including extremely low-income households, persons who are disabled, persons experiencing homelessness and those who live in seriously substandard housing are among the target population of the Consortium, as these types of families represent those with a high need for affordable housing. As there were no units completed in PY 2022, there were no extremely low-income households assisted.

The Consortium did not specifically report any persons with a disability in affordable housing programs, however if a household with a disability is identified for assistance in one of the housing programs, the Consortium will make all necessary accommodations within reason to meet the needs of the household.

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

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

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

The Consortium Census data shows a very small homeless population in the region. The Consortium is predominately rural and adequate data on homeless is not available. Homeless populations in rural areas are often not counted, because they are challenging to identify. The Consortium continues to work with service providers in the region such as Midlands Area Consortium for the Homeless (MACH), Habitat for Humanity, Mental Health America, CDCs, and religious based non-profits to assess the needs of homeless persons. Unfortunately, the available resources are not adequate to meet the need. The Consortium continues to participate in the local Continuum of Care planning and implementation process to find ways to partner in addressing the needs of this population. In PY 2023, the Consortium will also be administering HOME-ARP funding, specifically to address the needs of homeless persons and persons at risk of homelessness in the area.

#### Addressing the emergency shelter and transitional housing needs of homeless persons

The Consortium does not currently qualify for or apply for ESG funding or other emergency shelter assistance, however Orangeburg County recently served as a pass-through entity for funding for The Samaritan House to replace the roof on its homeless shelter. The agency was awarded \$450,000 through the state. An individual may stay at the Samaritan House for up to 90 days. During this time they receive services such as counseling, mental health assistance, and workforce development.

Mental Health America of Aiken County operates Nurture Home, a transitional housing program for women suffering from mental illness. It provides a stable educational environment of personal growth, healthy living, medical treatment, financial education, job coaching, and finally, successfully re-entering society. Weekly support groups are offered that enable residents to become empowered and confident in their choices and relationships. Parenting classes, health and nutrition classes, and various volunteer activities are provided. Residents are also provided credit counseling and budgeting financial literacy education.

Several organizations such as the Salvation Army, Community Action, and various churches also assist homeless persons with other supportive services and provide referrals to MACH for emergency shelter and transitional housing needs. The Consortium is willing to work with these service providers in an effort to maximize their funding efforts in order to make the greatest impact on the homeless population.

Helping low-income individuals and families avoid becoming homeless, especially extremely low-income individuals and families and those who are: likely to become homeless after

being discharged from publicly funded institutions and systems of care (such as health care facilities, mental health facilities, foster care and other youth facilities, and corrections programs and institutions); and, receiving assistance from public or private agencies that address housing, health, social services, employment, education, or youth needs

The counties within the Consortium region are predominately rural areas with high concentrations of low and very low-income persons coupled with high unemployment. Obstacles include a lack of affordable housing stock, a lack of adequate transportation to needed services for seniors and rural residents, high illiteracy rates, a lack of affordable insurance, rising taxes, and a shortage of reputable banks willing to lend to LMI families and individuals. The major obstacle to affordable housing is a lack of financial resources in the rural areas. The demand for homeowner rehabilitation is tremendous in the region, however funding for the need is scarce. Another obstacle in the rural areas is the lack of safe and decent housing for ownership and/or rent. The Consortium's partnership efforts and funding are helping to identify and overcome some of those obstacles.

The Consortium continues to work with the local Continuum of Care (MACH) to address homeless related issues. This Consortium assists the CoC with outreach and assessment to identify household needs and potential for homelessness. Permanent housing solutions are broadened with the addition of rental housing targeted at the lowest income brackets that are provided in part through the Consortium's rental program.

Salvation Army of Aiken, Aiken-Barnwell Community Action Agency, Salvation Army of Orangeburg, and Orangeburg-Calhoun-Allendale-Bamberg Community Action Agency, Inc provide rental assistance to prevent low-income individuals and families from becoming homeless in emergency situations. In addition to these organizations, other agencies in the region that provide supportive services for persons being discharged from publicly funded institutions, mental health facilities, foster care and other youth facilities, for employment, education and social services are: Alston Wilkes Society, Area Churches Together Serving (ACTS), Aurora Pavilion Behavior Health Services, South Carolina Department of Mental Health, South Carolina Department of Juvenile Justice, and SC Works Center.

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

The Consortium continued partnering with agencies that provide assistance with temporary housing, permanent affordable housing, mental health assistance, and/or obtaining employment and educational opportunities in the program year. The Consortium continued to work with service providers to make connections between needs and services as it pertains to chronically homeless individuals and families,

families with children, veterans and their families, and unaccompanied youth.

The lead organization helping homeless persons in the region is MACH. MACH uses a "no-wrong door" approach to help people find needed housing and services. MACH uses the Coordinated Entry System (CES) to ensure people who are most vulnerable in the area are prioritized for housing first and services are targeted accurately towards those in need.

The Samaritan House provides permanent housing through its Rapid Re-Housing Program. This program provides housing relocation and stabilization services and short and medium-term rental assistance to help a homeless individual or family move as quickly as possible into permanent housing and achieve stability in that housing.

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

#### Actions taken to address the needs of public housing

The Region 3 of the SC Regional Housing Authority has 506 public housing units and 371 subsidized units in the Consortium region. The Aiken City Housing Authority serves the City of Aiken which is a municipality participating in the Consortium. Currently the Aiken Housing Authority has 244 families (544 occupants) living in public housing. The Public Housing developments consist of Stoney-Gallman Townhomes, Bradby Homes, Hahn Village, New Hope I & II, Villa Oaks, and Crosland Park.

The mission of the SC Regional Housing Authority No. 3 is to provide all the necessary tools for a family to obtain and maintain affordable housing and home ownership in a safe, sanitary, and decent manner. In carrying out this mission, SCRHA3 creates partnerships with various community resources to ensure a complete needs fulfillment for families with the purpose of assisting them in the opportunity of becoming self-sufficient.

The mission of the Housing Authority of the City of Aiken is to assist low-income families with safe, decent, and affordable housing opportunities in a non-discriminatory manner as they strive to achieve self-sufficiency and improve the quality of their lives. The Housing Authority is committed to operating in an efficient, ethical, and professional manner. The Housing Authority develops and maintains partnerships with its clients and appropriate community agencies in order to accomplish this mission.

The Consortium meets regularly with the representatives of these housing authorities to identify needs and develop solutions to the issues of public housing. Input and coordination from the PHAs continues to be a valuable resource to the Consortium and is used as part of the planning process to improve the impact of the Consortium's programs.

Providing HOME funding through the rental development program has been one way to increase the affordable housing stock and transition families from public housing into a self-sustainable living situation.

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

Both SCRHA3 and AHA have a Family Self-Sufficiency Program. Family Self Sufficiency (FSS) is a HUD program that allows residents of HCV and public housing to build financial assets as the household increases earned income from wages. Participation generally lasts five years, during which participants identify educational, professional and personal goals. As a part of AHA's FSS program, participants work with the HCV department staff to develop a plan that outlines specific activities needed to achieve their economic self-sufficiency goals. Throughout the program, the staff monitors participants' progress and helps them move toward self-sufficiency. AHA's FSS services are in coordination with the Workforce Investment Act, also known as the (WIA) program. As participants achieve employment goals and increase household income from wages, their rent increases. An amount equitable to the monthly rent increase is set aside each month into an escrow savings account. When participants meet all of their goals and

graduate from the program, they are eligible to receive a payout of the escrow accrued during their participation.

SC Region 3 Housing Authority partners with Southeastern Housing and Community Development's Financial Resource Center to provide pre-purchase counseling, financial counseling, homebuyer education, and a Lease Purchase Program. Potential homeowners in the Lease Purchase Program can move into an available unit while they are working to become mortgage ready. During the rental period, the homeowner must actively participate in housing counseling and pay rent based upon their income. Once the potential homeowner becomes mortgage ready, they will begin the process to purchase the home. Fifty dollars from each month's rent is set aside for the potential homebuyer to use for down payment and closing cost assistance for the purchase of that home.

#### Actions taken to provide assistance to troubled PHAs

N/A. The PHAs in the Consortium region are not troubled PHAs.

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

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

The following issues were identified in the Consolidated Plan as barriers to affordable housing in the Lower Savannah area:

- Reduction in federal funding for housing assistance programs
- Development regulations and fees
- Transit service is limited to urban areas, while more affordable housing is often found in more rural areas
- Income is simply not enough to afford adequate housing for many residents
- LMI persons desiring to purchase a home and currently paying more than they can afford for rental housing, results in the inability to save enough money for a down payment or for closing costs
- While standard mortgages require borrowers to have good credit histories, renters living handto-mouth are less likely to have established a good credit history and are at greater risk for developing bad credit histories due to late payments or defaults on loans from payday or predatory lenders
- Many persons of low and moderate incomes lack the education and job skills needed to obtain higher-paying jobs that can enable them to afford housing in certain areas within the region
- Because of literacy, language, and educational barriers, many LMI residents do not fully understand the processes, responsibilities and legal aspects of renting and homeownership.

Lower Savannah Council of Governments (LSCOG) staff provided technical assistance to its local governments in the Consortium region on matters such as planning, land use, zoning, building codes, regulations, ordinance enforcement, and policies applicable to growth and land use. The COG considers barriers to affordable housing and refer to the Consolidated Plan, Action Plans, and Analysis of Impediments to Fair Housing when giving advice or making recommendations to local governments regarding land use restrictions. See below for additional actions taken to address Impediments identified in the Al.

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

The participating jurisdictions of the Consortium and its partners placed a high priority on addressing the underserved needs, including the issue of regional low wages and unemployment, social exclusion and the need for regional economic diversification, and community and downtown revitalization. Although essential short-term direct aid such as emergency food and shelter is important, the Consortium works with its partners to address poverty's root causes and assist people in becoming self-sufficient long-term.

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

It is common that the houses that are rehabilitated through the Homeowner Rehab program contain lead-based paint. The Consortium reviews units built prior to 1978 for the presence of lead-based paint prior to any HOME funds being invested in the unit. All property owners and occupants are given informational pamphlets on lead hazards. If lead paint is found in a unit, a certified lead-based paint abatement contractor is procured to abate the lead-based paint. The Consortium contracts with both certified lead assessment and certified lead abatement contractors for applicable projects.

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

Efforts among participating counties and partner organizations, such as faith-based organizations, businesses, health and human service agencies, private developers, lenders, and nonprofit service providers are organized to meet goals that have been outlined in the Consolidated Plan.

A number of other public, private, and partnership initiatives have been developed to reduce the number of poverty-level families in addition to HOME funded programs. These partnerships include the Lower Savannah Workforce Investment Board, United Way, First Steps, Salvation Army Shelters, Christ Central, Project HOPE and the Continuum of Care.

Additional strategies developed to reduce poverty in the Consortium region include development of the tourism industry, attracting new businesses and encouraging competition among existing businesses, managing growth and encouraging redevelopment within existing cities, creating performance-based economic development, developing public-private investment strategies, and encouraging people-based economic development.

Recognizing that the limited funding should be focused where the need is greatest, the Consortium gives preference to projects that directly benefit low- and moderate-income residents. This strategy ensures that scarce resources are directed to best serve those who have the greatest need, including those areas with the greatest concentrations of poverty.

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

The programs described in the document are managed by a lead agency, Orangeburg County, South Carolina; however, the Lower Savannah Council of Governments (LSCOG) directs the daily administration of the Consortium program through a written agreement with Orangeburg County.

Lower Savannah Council of Governments is a regional planning and development organization made up of six counties. The staff of LSCOG have been administering housing projects involving CDBG and HOME funds since 1975. Municipalities and other organizations contribute ideas and suggestions that lead to the successful administration of these programs.

A process has been established that allows a Technical Review Committee (TRC) consisting of representatives from all counties participating in the Consortium to make recommendations for projects to pursue. The ultimate decision regarding the geographic distribution of HOME funds rests with the HOME Consortium policy board, which consists of the LSCOG Board of Directors, but it is also affected by the availability of entities with the capacity and willingness to develop projects. The Consortium is continuously working with community development organizations and other stakeholders to develop viable projects that fulfill unmet needs.

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

The Consortium to works towards the following goals:

- Increase the availability of decent, safe, and affordable housing
- Improve community quality of life and economic vitality
- Promote self-sufficiency and assist development of families and individuals
- Ensure Equal Opportunity in Housing for all Americans

In order to accomplish this goal, the Consortium works closely with all public and private housing and community development organizations to further these goals. The housing providers, community development organizations and the CoC provide input through community participation activities organized by the Consortium.

The Consortium's activities work directly to address the goals of providing decent, safe and affordable housing as well as ensuring equal opportunity in housing for all residents in the service area. The Consortia funds CHDOs for rental housing construction, Habitat for Humanity with housing construction and Consortia staff oversee owner-occupied housing rehab and fair housing outreach.

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

The Lower Savannah Council of Governments developed a regional Analysis of Impediments to Fair Housing Choice (AI) that was completed in May 2016. This AI was developed to identify the impediments to fair housing choice and identified affordable housing barriers in the process. Below is a list of identified impediments and the actions taken to address impediments:

Impediment 1: Lack of Sufficient Affordable Housing Options

Impediment 2: Poor Credit History is Preventing Home Ownership Opportunities

Impediment 3: Lack of Sufficient Handicap Accessible Housing Units & Special Needs Housing

Impediment 4: Concentrations of Racial/Ethnic Segregation and Housing Problems

Impediment 5: Lack of Fair Housing Awareness

Impediment 6: Lack of Transportation Options

Actions Taken:

The Consortia helped to address the lack of sufficient affordable housing options by continuing its work on homeowner housing construction and rental construction throughout the region.

The Consortium also continues to promote fair housing on daily basis and regularly sends out flyers and posters to the counties and municipalities in the Consortium region. Promotional flyers and posters provided Consortium members and residents with information on discrimination, fair housing rights and where to get assistance.

The Consortium also partners with other departments at the Lower Savannah Council of Governments such as the Transportation and Transit department to address the lack of transportation options in the region. Some of the initiatives taken are the Aging, Disability and Transportation Resource Center (ADTRC) which informs and assists people in the region to continue healthy independent living, benefits and resources and transportation for this group. The department is also responsible for transportation planning and other studies that help to benefit residents in the area.

#### CR-40 - Monitoring 91.220 and 91.230

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

The Lower Savannah Regional HOME Consortium (LSRHC) is administered by the Lower Savannah Regional Council of Governments (LSCOG). LSCOG monitors HOME Program subrecipients and CHDOs to ensure compliance with the HOME Program requirements. The Consortium maintains an annual monitoring and evaluation process that ensures programs are carried out in accordance with 24 CFR Part 92.

Monitoring is an on-going process in all HOME projects. LSCOG HOME Program staff maintains frequent contact with each HOME subrecipient or developer during every phase of the project. Staff is especially involved in the pre-development phase by providing technical assistance to project developers in underwriting and subsidy layering. During the development stage staff provides oversight of housing activity as it relates to procurement, Section 3, and Davis-Bacon requirements (if applicable). At project completion staff continues its oversight of the project in order to measure compliance with the regulations on a long-term basis. Monitoring is provided as a means of providing technical assistance to each project in order to ensure HOME program compliance.

HOME program staff regularly generate internal reports on the status of every HOME-funded activity. Program-wide data, such as the number of units developed, number of families assisted, and the amount of HOME funds remaining are reviewed. If questions or concerns arise, staff request additional information from the appropriate source and provide technical assistance as needed.

Desk monitoring is accomplished on projects and programs using written communication, telephone communication, and meeting with sub recipients or developers. On-site monitoring is conducted during various phases of each project or program. Initially, subrecipients or CHDOs new to the LSRHC HOME Program receive an on-site monitoring visit by the LSCOG HOME program staff member for the purpose of technical assistance. This visit is conducted prior to the first request for payment for HOME funds.

If it is determined that the subrecipient or CHDO has not met a requirement of the HOME Program, the Consortium will provide written notice of this determination and give the subrecipient or CHDO an opportunity to demonstrate compliance within a specified timeframe. If unable to demonstrate compliance, the Consortium will take corrective action or remedial action.

The Consortium maintains a list of qualified minority and women owned businesses, assuring that these businesses are solicited when there is a partnership opportunity.

#### **Comprehensive Planning Requirements**

The comprehensive planning requirements include the community planning and development process of

the 5-Year ConPlan, subsequent AAPs, and CAPERs as per 24 CFR 91 Subpart A, C & F. Citizen participation is a vital part of the consolidated plan process, and the Consortium will make sure to follow its HUD approved Citizen Participation Plan (CPP) which helps guide staff to gather community input which is an essential component in identifying the priority housing and community development needs in the region. The ConPlan is developed every 5 years, with identified priority needs and goals to address these needs. Each year of the 5-Year plan, the Consortium develops an AAP which identifies the projects and activities that will address and further the goals of the plan. This plan is required to be submitted to and approved by HUD each year to receive HOME funding annually. At the end of each AAP program year, the Consortium will report on the accomplishments and performance of the program through the CAPER (performance report). Citizen participation is required in the development of each of these stages as per 24 CFR 91.105.

#### **MBE and WBE Business Contracts**

The HOME Consortium is a recipient of federal HOME funding, and encourages certified disadvantaged, minority, or women-owned small businesses to participate in procurement opportunities as they are available. Procurement opportunities are advertised as they are available on the LSCOG website at: https://www.lscog.org/procurement-bids

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

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

The Consortium held a 15-day public comment period and public hearing for citizens to review and make comment of the draft 2022 CAPER. A notice was given in the Times and Democrat to provide details of the public comment period and public hearing and how to make written comments.

Public Comment Period: All interested persons were invited to review the CAPER's summary of activities funded and their associated accomplishments toward the Consolidated Plan goals. Copies were available at Orangeburg County Administration Building 1437 Amelia Street, Orangeburg, SC, 29116 and Lower Savannah Council of Governments (LSCOG), 2748 Wagener Road, Aiken, SC 29802 from **September 6**, **2023 to September 20**, **2023.** Written comments could be made to Regina Jackson, Housing Programs Manager, LSCOG, P.O Box 850, Aiken, SC 29802, fax (803) 649-2248, or e-mail rjackson@lscog.org.

A summary of comments will be included after the public comment period.

Public Hearing: A public hearing will be held in the Council Chambers of Orangeburg County Administration Building at 1437 Amelia Street, Orangeburg, SC, 29116 on **September 13, 2023 at 4:00pm** to review and discuss the draft CAPER. For more information on how to participate at the public hearing please e-mail rjackson@lscog.org

A summary of comments will be included after the public hearing.

Orangeburg County and LSRHC do not discriminate based on handicapped status in the admission or access to, or treatment or employment in its federally assisted programs or activities. Human Resources of Orangeburg County, 1437 Amelia Street, SC 29115 phone number (803) 533-6100 has been designated to coordinate compliance with the nondiscrimination requirements contained in the U.S. Department of Housing and Urban Development's regulations implementing Section 504 (24 CFR Part 8, dated June 2, 1988). Assistance will be provided to accommodate the special needs of handicapped persons attending the meeting upon request. Persons needing special assistance or auxiliary aids should contact Orangeburg County at (803) 533-6100 seventy-two (72) hours before the public hearing.

#### CR-50 - HOME 24 CFR 91.520(d)

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

Please list those projects that should have been inspected on-site this program year based upon the schedule in 24 CFR §92.504(d). Indicate which of these were inspected and a summary of issues that were detected during the inspection. For those that were not inspected, please indicate the reason and how you will remedy the situation.

In PY 2022, there were no housing inspections completed due to a series of staffing turnover. There was one staff change at the beginning of PY 2022, and then another change mid-year. Due to this change, housing inspections were delayed to PY 2023. At the start of PY 2023 housing inspections proceeded, and the Consortium will report these results in the upcoming CAPER report.

The Consortium's goal with inspections is to ensure all units are in good standing. General issues addressed in these units are typically repairs to bathroom and kitchen sinks/appliances, doors and windows, interior walls and ceilings, flooring and exterior repairs.

# Provide an assessment of the jurisdiction's affirmative marketing actions for HOME units. 24 CFR 91.520(e) and 24 CFR 92.351(a)

The Consortium encourages actions to provide information and otherwise attract eligible persons in the housing market area to the available housing HOME projects without regard to race, color, national origin, sex, religion, familial status, or disability. The Consortium did not complete any development projects with five or more units during PY 2022 in the HOME affordable housing programs, however the CHDOs in the Consortium region have adopted affirmative marketing plans.

#### MBE/WBE Business Contracts

As a recipient of federal HOME funding, the Consortium encourages certified disadvantaged, minority, or women-owned small businesses to participate in procurement opportunities as they are available for the HOME program. There were no contracts awarded in PY 2022. Procurement opportunities are advertised as they are available on the LSCOG website at: https://www.lscog.org/procurement-bids

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

The Consortium did not receive any HOME program income during the 2022 program year. According to the PR-09 IDIS report, the Consortium has not received program income historically.

Describe other actions taken to foster and maintain affordable housing. 24 CFR 91.220(k) (STATES ONLY: Including the coordination of LIHTC with the development of affordable

#### housing). 24 CFR 91.320(j)

During PY 2022, the Consortium concentrated its efforts on programming and funding projects in its efforts to foster and maintain affordable housing. The Consortium is working with Habitat for Humanity to assist one LMI homebuyer in PY 2022 with construction of affordable housing units. The Consortium is helping by supplying Habitat with the material costs for the construction.

The rental housing development programs continue to add affordable units to the area. The Consortium is currently working with its CHDO, New America Corporation, on the construction of a new four-unit affordable rental housing project called Peasley Townhomes, located at 883 Peasley St., Orangeburg, SC. The four units will be available for households earning 80% or less of the AMI.

The Consortium does not own or maintain affordable housing, but provides technical assistance to CHDOs and community development corporations who do provide and maintain affordable housing.

#### **HOME-ARP**

In September 2021, HUD announced the allocation of \$3,855,545 to Orangeburg County/Lower Savannah Regional HOME Consortium (LSRHC) for a new grant called the HOME Investment Partnerships American Rescue Plan (HOME-ARP). The purpose of HOME-ARP funds is to provide homelessness assistance and supportive services through several eligible activities. Eligible activities include acquisition and development of non-congregate shelter, tenant based rental assistance, supportive services, HOME-ARP rental housing development, administration and planning, and nonprofit operating and capacity building assistance.

HOME-ARP funds must assist people in HOME-ARP "qualifying populations", which include; sheltered and unsheltered homeless populations; those currently housed populations at risk of homelessness; those fleeing or attempting to flee domestic violence or human trafficking; other families requiring services or housing assistance or to prevent homelessness; and those at greatest risk of housing instability or in unstable housing situations.

To receive funding, the Consortium developed a HOME-ARP Allocation Plan which describes the distribution of HOME-ARP funds and identifies any preferences for eligible activities. The development of the HOME-ARP Allocation Plan was informed through stakeholder consultation and public engagement. Lower Savannah Council of Governments (LSCOG) prepared the HOME-ARP Allocation Plan on behalf of LSRHC. This plan was submitted to and approved by HUD.

LSCOG will administer the HOME-ARP program behalf of LSRHC. LSRHC will allocate a portion (30%) of its allocation to the development of affordable rental housing. LSRHC will allocate another 30% of HOME-ARP funds towards the acquisition and development of non-congregate shelter. LSRHC estimates there will be nine new rental units constructed throughout the region produced using HOME-ARP funds that will provide direct support to the qualifying populations in the region. LSRHC will also allocate approximately 20% of HOME ARP funds towards Supportive Services. By funding Supportive Services,

LSRHC aims to increase housing stability and reduce levels homelessness and those at-risk of homelessness within the qualifying populations by providing a baseline support that addresses multiple challenges of these persons and households. Supportive Services activities will prioritize mental health services, but also include case management, substance abuse treatment, outpatient health services and rental assistance. Fifteen percent (15%) of the allocation is set aside for costs of overall HOME-ARP program management and 5% allowance for Nonprofit Operating Assistance to pay operating expenses of CHDOs and other nonprofit organizations that will carry out activities with HOME-ARP funds.

### CR-58 - Section 3

### Identify the number of individuals assisted and the types of assistance provided

Total Labor Hours	HOME
Total Number of Activities	0
Total Labor Hours	0
Total Section 3 Worker Hours	0
Total Targeted Section 3 Worker Hours	0

#### **Table 14 – Total Labor Hours**

Qualitative Efforts - Number of Activities by Program	HOME
Outreach efforts to generate job applicants who are Public Housing Targeted Workers	0
Outreach efforts to generate job applicants who are Other Funding Targeted Workers.	0
Direct, on-the job training (including apprenticeships).	0
Indirect training such as arranging for, contracting for, or paying tuition for, off-site	0
training.	U
Technical assistance to help Section 3 workers compete for jobs (e.g., resume	0
assistance, coaching).	U
Outreach efforts to identify and secure bids from Section 3 business concerns.	0
Technical assistance to help Section 3 business concerns understand and bid on	0
contracts.	U
Division of contracts into smaller jobs to facilitate participation by Section 3 business	0
concerns.	U
Provided or connected residents with assistance in seeking employment including:	
drafting resumes, preparing for interviews, finding job opportunities, connecting	0
residents to job placement services.	
Held one or more job fairs.	0
Provided or connected residents with supportive services that can provide direct	0
services or referrals.	U
Provided or connected residents with supportive services that provide one or more of	
the following: work readiness health screenings, interview clothing, uniforms, test	0
fees, transportation.	
Assisted residents with finding child care.	0
Assisted residents to apply for, or attend community college or a four year educational	0
institution.	U
Assisted residents to apply for, or attend vocational/technical training.	0
Assisted residents to obtain financial literacy training and/or coaching.	0
Bonding assistance, guaranties, or other efforts to support viable bids from Section 3	0
business concerns.	0
Provided or connected residents with training on computer use or online	0
technologies.	0

Promoting the use of a business registry designed to create opportunities for	
disadvantaged and small businesses.	
Outreach, engagement, or referrals with the state one-stop system, as designed in	0
Section 121(e)(2) of the Workforce Innovation and Opportunity Act.	0
Other.	0

Table 15 – Qualitative Efforts - Number of Activities by Program

#### Narrative

On October 29, 2020 HUD made effective the Final Rule, which set new benchmarks for Section 3 under 24 CFR 75. Section 3 helps to establish more economically sustainable communities by ensuring that employment and other economic opportunities generated by Federal assistance for development programs are directed towards very low- and low-income persons to the greatest extent possible, and in particular to those who are recipients of the Federal assistance. The Final Rule changes tracking the number of qualified new hires in Section 3 projects, to tracking the total labor hours worked.

Section 3 Projects cover housing rehab/construction and public improvement construction activities assisted under HUD grant programs that provide housing and community development financial assistance which exceed a threshold of \$200,000. The benchmark for Section 3 workers is set at 25 percent or more of the total number of labor hours worked by all workers on a Section 3 workers is set at 5 percent or more of the total number of labor hours worked by all workers on a Section 3 project.

The Consortium started one new rental development activity that triggers the Section 3 reporting requirement. Activity #159 Peasley Townhomes was funded for \$450,000 and is currently in development. These rental units will be developed by CHDO New America Corporation and is located at 883 Peasley St., Orangeburg, SC. The Consortium will provide assistance and help New America to meet the Section 3 requirements.