

2022
Burlington County
Annual Plan



Executive Summary

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

1. Introduction

Spanning 820 square miles from the Delaware River to the Great Bay of the Atlantic Coast, Burlington County is the largest of New Jersey's 21 counties. The county neighbors metropolitan Philadelphia and is home to Joint Base McGuire-Dix-Lakehurst, the nation's only tri-service military installation. It consists of 40 municipalities, including several historic towns along the Delaware River, bedroom suburbs, and rural towns with large quantities of farmland or environmentally sensitive Pinelands Forest.

A total of 461,860 people reside in Burlington County in 2020, according to the official U.S. Census count, an increase of just over 13,000 residents compared to the 448,734 counted in 2010. Approximately 64% of the county's population were White, 16% Black and 9% Hispanic according to the Census Bureau.

Burlington County has also experienced significant economic growth and development. In 2021, building permits were issued for nearly 7 million square feet of new construction and the number of employed workers living in the county was projected to grow to 222,400 by 2024, up from 208,900 in 2014.

The county is also a statewide and national leader in land preservation, with more than 62,000 acres of farmland preserved within the county, along with more than 1,000 acres of developed parkland.

The County's Annual Plan responds to national goals established by the U.S. Department of Housing and Urban Development (HUD):

- Provide decent housing
- Establishing and maintaining a suitable living environment; and
- Expanding economic opportunities particularly for moderate-, low- and extremely-low income residents.

The Annual Plan is intended to coordinate the County's Community Development activities with those of other public agencies, private non-profit affordable housing providers, and non-housing providers and establishes a unified, coordinated vision for Community Development actions for the next five years.

2. Summarize the objectives and outcomes identified in the Plan

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

The Annual Plan outlines major priority needs to be based on the Needs Assessment and Market Analysis. These include:

- Public Facilities and Improvements-support the use of Community Development Block Grant (CDBG) funding for public facilities and improvements. This includes, but is not limited to, road improvements, removal of architectural barriers at public facilities, and water/sewer improvements.
- Public Services-Non-homeless and Homeless-Support the use of CDBG Public Service funds for activities that benefit and address housing, homelessness, and homeless prevention, transportation for seniors and disabled, and supportive services that provide long-term meaningful change for their participants through education and training.
- Housing Rehabilitation and Emergency Assistance-Provide housing rehabilitation assistance for low-income homeowners living in substandard housing and provide assistance that addresses emergency housing issues affecting immediate health and safety for low/moderate-income homeowners.
- Affordable Housing-Increase and improve housing affordability by developing or rehabilitating new rental and homeowner affordable housing and assistance to first-time homebuyers.

3. Evaluation of past performance

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

Burlington County Community Development establishes its goals and activities to address identified community needs and gaps in services as established during its citizen participation and local consultation process. Activities and projects which are consistent with the goals and objectives of the Consolidated Plan are chosen according to community needs and along with an evaluation of past performance and implementation capacity of grant/loan recipients.

Burlington County Community Development annually publishes a Consolidated Annual Performance and Evaluation Report (CAPER). The CAPER evaluates and provides details on the prior year's performance and the Five-Year Consolidated Plan. Burlington County has, for the most part, been successful at meeting its stated goals and objectives.

4. Summary of Citizen Participation Process and consultation process

Summary from citizen participation section of plan.

Burlington County follows the Citizens Participation Plan's goals and the elected General Advisory Board's governance. In accordance with the Citizens Participation Plan, the community is involved in the process as outlined in the County's and HUD's policy.

5. Summary of public comments

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

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

All comments were accepted if made.

7. Summary

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

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

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

Agency Role	Name	Department/Agency
CDBG Administrator	BURLINGTON COUNTY	Community Development and Housing
HOME Administrator	BURLINGTON COUNTY	Community Development and Housing

Table 1 – Responsible Agencies

Narrative (optional)

Consolidated Plan Public Contact Information

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

1. Introduction

Burlington County conducted consultation as part of planning in different venues where citizens representing the public, municipal officials, nonprofit agencies, public housing agencies, private developers, governmental agencies and the Continuum of Care (CoC) could assist in preparing this plan. This was a different process due to Covid-19 and the adjustments made during the pandemic. However, meeting turnout and participation was high.

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 County of Burlington is committed to addressing homeless citizens' needs concerning both physical and mental/behavioral health needs. Burlington County staff from the Human Services Department, including the Division of Community Development and Housing, has taken the lead in Burlington County's Continuum of Care. The CoC facilitates the process and provides direction on planning and policy issues that impact the homeless population. Burlington County also assists local applicants in developing applications for HUD McKinney-Vento Notice of Funds Opportunity (NOFO) for programming designed to serve the homeless and special needs populations within Burlington County. The CoC is comprised of public and assisted housing providers, private and governmental health, mental health and service agencies providing services in Burlington County. This collaboration enables Burlington County to provide human services to the homeless and identify and address gaps in the County's services. The Human Services Department works with over 20 providers through the CoC and consolidated planning process.

Current and recent initiatives include:

1. An ongoing assessment of the Homeless Management Information System (HMIS) to improve electronic and data monitoring by tracking and monitoring performance and enhancing access to HMIS.
2. More structured collaboration with mental health planning partners, mental health board, residential health care facilities, and transportation assessment.
3. System-wide coordination including Veterans Services coordination, restructuring of CoC into performance management and oversight group, and exploration of opportunities for regional coordination and integration.

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.

Coordination of Burlington County's homeless strategy is coordinated through the CoC. It is made up of several private nonprofit organizations that directly contract with HUD for Continuum of Care funding. The agencies that make up the Continuum work as part of the CoC, which has made considerable gains over the past year in its advocacy toward developing a network system to prevent institutional discharge of persons resulting in homelessness.

Burlington County has a Housing HUB that is a one-stop for homeless housing needs to be assessed and addressed. This office has experienced case managers working in collaboration with our local Board of Social Services, the State of N.J. Social Services for the Homeless funded agency providers, the Continuum of Care and HEARTH Act methodology for tracking persons quickly to permanent housing, and working within the HMIS and Coordinated Entry system of delivery services.

Legacy Treatment Services addresses the special needs of youth in the state foster care system who need specialized behavioral residential services and those youth who are "aging out" of the foster care system. Legacy also provides clinical case management services specifically for mentally ill and homeless individuals or imminently homeless. Legacy, Oaks Integrated Care, and Catholic Charities Delaware House all provide supportive housing, enhanced supportive housing, and medically enhanced supportive housing services for individuals who are ready for discharge from state psychiatric hospitals. Oaks Integrated Care also provides Intensive Case Management for all consumers discharged from the State, county and psychiatric short-term care facilities in Burlington County. Psychiatric screening outreach staff go to the jails weekly to screen inmates for eligibility for community-based mental health services and housing opportunities to prevent homelessness, relapse of substance abuse, disruption of mental health services, increase in psychiatric symptoms and criminal recidivism.

NJ211 provides a 24-hour telephone referral service linking callers with any needed service after hours and on weekends.

Special outreach linkages have been established by agencies that serve special needs populations among the homeless. CoC staff works collaboratively with the Mental Health Board, the Board of Social Services, and applicant agencies to ensure that resources are available for individuals discharged from local area hospitals.

To accomplish the goals of ending homelessness and reducing the use of hotel/motel placements for emergency shelter services, Emergency Shelters will be located throughout the county to service specific target populations and serve as a "front door" to the homeless delivery system.

Vendors have been identified to provide and improve sheltering options that track quickly to permanent housing and will be instrumental in implementing an approved pilot program that targets individuals receiving emergency assistance to provide intensive case management services and be responsible for

the development of self-sufficiency plans, quick transition to permanent housing, job training support, improved access to disabilities benefits and income growth.

Coordination with the homeless service providers and Work First staff will divert new applicants and increase diversion to training programs and on-the-job training opportunities. Veteran Services work with veterans and their families to identify V.A. benefits and additional public benefit opportunities such as housing counseling, health care, child care, education, legal, transportation, financial planning, daily living services, and temporary financial assistance.

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

Burlington County does not receive direct ESG or ESG-CV funding. However, the State of New Jersey Department of Community Affairs (DCA) is the ESG recipient covering the CoC region. DCA hosts conference calls and provides an opportunity for community stakeholders to submit written comments related to their ESG funds to submit a letter of support from the CoC as evidence that the project is in line with local policies and system priorities. The CoC reviews all requests for letters of support and the committee votes on those requests. ESG projects funded through DCA are included in the local evaluation of system performance and are subject to the HMIS data quality reviews conducted locally. The Community Development Office, responsible for putting together the Consolidated Plan, currently serves as the CoC Lead Agency and coordinates CoC planning efforts as well as Point in Time (PIT) and Housing Inventory Count (HIC) information, which is included in the Consolidated Plan as applicable and shared with Consolidated Plan jurisdictions for inclusion in their plan.

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

Table 2 – Agencies, groups, organizations who participated

1	Agency/Group/Organization	CATHOLIC CHARITIES - DIOCESE OF TRENTON
	Agency/Group/Organization Type	Housing
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	On-going work in the Continuum of Care. A broader understanding of those needs is expected to lead to joint participation in a rapid re-housing program and create more significant housing opportunities.
2	Agency/Group/Organization	Burlington County Board of Social Services
	Agency/Group/Organization Type	Services - Housing Services-Elderly Persons Services-homeless Other - Local County Welfare Association funded both with Federal and State dollars
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Public Housing Needs Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	The organization was consulted through CoC discussions and committee meetings in needs assessment and homeless strategy relating to those facing homelessness. A broader understanding of those needs is expected to create a new homeless strategy focused on rapid re-housing.

3	Agency/Group/Organization	Burlington County Continuum of Care
	Agency/Group/Organization Type	Planning organization
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	The organization was consulted through group discussions and homeless strategies relating to those facing homelessness. A broader understanding of those needs is expected to create greater housing opportunities and better coordination of services and strategies.

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

During the Covid-19 pandemic, non-in-person schedules along with remote work schedules, most of the outreach done was during our Continuum of Care meetings and advisory meeting workgroups. Our General Advisory Committee and Burlington County Coalition Serving the Homeless have a significant representation of public, private and citizens. At each meeting, the Office of Community Development and Housing had an agenda slot to discuss planning and serving needs for the upcoming 2022 plan.

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	Department of Human Services Division of Community Development and Housing	Homelessness prevention and rapid re-housing goals, strategies, and actions to be taken

Table 3 – Other local / regional / federal planning efforts

Narrative (optional)

The principal organization for planning and programmatic consultations is the Community Development General Advisory Committee. This 60-member citizens' advisory committee was established at the inception of Burlington County's CDBG Program in 1977 to study the County's housing and community development needs, develop program priorities and recommend activities for funding. The Advisory Committee has a broad base of expertise and comprehensively represents community interests. Representation on the Committee includes:

- Mayor/official from each municipality
- Realtors and housing industry representatives
- Burlington County Office on Aging
- Labor Unions
- County Department of Health
- Community Action Program
- County Work Force Investment Board
- Banks and Mortgage companies
- County Jobs Training Program
- Environmental community
- County Planning Board
- Municipal Managers
- Five (5) Citizens-at-Large
- Joint Base McGuire-Dix-Lakehurst

The Advisory Committee holds a series of meetings on an annual schedule to consider the Consolidated Plan components and the Annual Action Plan and make recommendations to the Burlington County Board of County Commissioners.

AP-12 Participation – 91.105, 91.200(c)

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

To engage the public at large in the consultation process, County-sponsored public hearings were conducted. To allow the opportunity to be accessible to the greatest number of people, the draft plan was placed on the County's website. Two virtual public hearings (June 2nd and June 22nd, 2022) took place during the Public Meeting session of the Burlington County Board of County Commissioners' meeting before they adopted the Annual Action Plan during the 30-day public comment period. A notice of the Plan's availability for review and comment, including a summary of the Plan and specified locations where it could be reviewed, was published in the *Burlington County Times*. All meetings were held virtually and the meeting information was posted on the County website.

Citizen Participation Outreach

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (if applicable)

Table 4 – Citizen Participation Outreach

Expected Resources

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

Introduction

Although it is difficult to predict all sources of leveraged funds over five years for a 40-community consortium, several funds have consistently been leveraged to accomplish goals and objectives under our five-year consolidated plan and annual action plans.

Anticipated Resources

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1			Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$		
CDBG	public - federal	Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services	1,446,598	50,000	0	1,496,598	Funds used primarily to support Public Improvements and Public
						2,800,000	

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
HOME	public - federal	Acquisition Homebuyer assistance Homeowner rehab Multifamily rental new construction Multifamily rental rehab New construction for ownership TBRA	947,475	50,000	1,775,000	2,772,475	1,717,940	HOME funds are used for a First Time Homebuyers Program and to partially
Competitive McKinney-Vento Homeless Assistance Act	public - federal	Other	552,171	0	0	552,171	2,208,684	Additional resources include state funding, agency fundraising, and private grants.
General Fund	public - local	Housing	0	0	0	0	0	

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
LIHTC	public - state	Housing Multifamily rental new construction Multifamily rental rehab	9,589,919	0	0	9,589,919	38,359,676	Leverage funds may include private mortgage, housing trust funds, historic tax credits, federal home loan bank, and deferred developer fees
Section 8	public - federal	Housing Other	20,000,000	0	0	20,000,000	80,000,000	Housing Choice Vouchers managed by DCA may be used within Burlington County.
Other	private	Public Services Other						Funding from Casino revenue to support the senior and disabled population and is provided as part of the overall funding package including CDBG and other state funding for transportation services
Other	public - federal	Housing Other	817,399	0	0	817,399	3,269,596	Additional funding for activities assisted with these funds is from FEMA
Other	public - state	Housing	1,378,539	0	0	1,378,539	5,514,156	Funding to assist the homeless, with prevention and rapid rehousing.
Other	public - state	Housing Other	473,800	0	0	473,800	1,895,200	
			0	0	0	0	0	

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1			Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$		
Other	public - local	Public Improvements	271,365	0	0	1,085,460	Leverages funds from the CDBG program and state funding for public improvements.

Table 5 - Expected Resources – Priority Table

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

In addition to the funds enumerated above that have frequently been leveraged due to the availability of federal funds, CDBG and HOME funds are intended to leverage other funding sources. The CDBG grants sub-granted to municipalities require that each municipality provide some funding for their activity by, at the least, providing the funding to cover engineering/architectural fees. The nonprofit agencies are receiving limited funding, all securing additional funding from State, federal and local programs. The Burlington County First Time Homebuyers Program requires that each first-time homebuyer contribute 3% of their funds toward the home's purchase. The HOME Developer Program mandates that each activity funded meets the minimum threshold of 25% match; however, in most cases, Burlington County's HOME loan is a minor, but necessary part of the total funding package. The match contributions are land donations, deferral of taxes and fees, cash investments, private and state or local sources, and below-market-rate loans.

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

Not applicable.

Discussion

All recipients of assistance under the Community Development Block Grant Program and the HOME Investment Partnerships Program are expected to share the burden of costs for their respective activities. The funding sources utilized to support that cost-share come from various local, state, federal, and private sources.

Annual Goals and Objectives

AP-20 Annual Goals and Objectives

Goals Summary Information

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	Affordable homeowner housing - home buyer	2020	2024	Affordable Housing		First time homebuyer assistance	HOME: \$260,179	
2	Housing rehabilitation	2020	2024	Affordable Housing		Rehabilitation of owner-occupied homes	CDBG: \$120,000	Homeowner Housing Rehabilitated: 6 Household Housing Unit
3	Affordable rental housing creation	2020	2024	Affordable Housing Homeless Non-Homeless Special Needs		Construction of affordable rental housing	HOME: \$500,000	Rental units constructed: 22 Household Housing Unit
4	Emergency shelter for victims of domestic violence	2020	2024	Homeless		Emergency shelter for victims of domestic violence	CDBG: \$30,000	Homeless Person Overnight Shelter: 150 Persons Assisted
5	Infrastructure improvements	2020	2024	Non-Housing Community Development		Infrastructure improvements	CDBG: \$600,000	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 2518 Persons Assisted

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
6	Public facility improvements	2020	2024	Non-Housing Community Development		Public facility improvements	CDBG: \$355,000	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 5500 Persons Assisted
7	Senior centers	2020	2024	Non-Housing Community Development		Senior center creation and/or improvements		
8	Transportation services	2020	2024	Non-Housing Community Development		Special needs transportation services	CDBG: \$90,000	Public service activities other than Low/Moderate Income Housing Benefit: 300 Persons Assisted
9	Homelessness prevention and rapid re-housing	2020	2024	Homeless		Homelessness assistance and prevention services	CDBG: \$75,000	Homeless Person Overnight Shelter: 1000 Persons Assisted
10	Emergency home repair	2020	2024	Affordable Housing		Rehabilitation of owner-occupied homes	CDBG: \$60,000	Homeowner Housing Rehabilitated: 20 Household Housing Unit
11	Emergency heater replacement	2020	2024	Affordable Housing		Rehabilitation of owner-occupied homes	CDBG: \$60,000	Homeowner Housing Rehabilitated: 12 Household Housing Unit
12	Administration - CDBG	2020	2024	Non-Housing Community Development		Administration of CDBG Program	CDBG: \$298,033	
13	Administration - HOME	2020	2024	Affordable Housing		Administration of HOME Program	HOME: \$84,464	

Table 6 – Goals Summary

Goal Descriptions

1	Goal Name	Affordable homeowner housing - home buyer
	Goal Description	Provide assistance to low and moderate-income first time homebuyers to purchase their first home by providing closing costs and down payment assistance in the purchase of a home.
2	Goal Name	Housing rehabilitation
	Goal Description	Preservation and enhancement of existing housing stock through home rehabilitation by providing direct assistance to owner-occupied dwellings to make repairs to the home to eliminate health and safety hazards, make them more energy-efficient and bring them up to code standards.
3	Goal Name	Affordable rental housing creation
	Goal Description	Construction of new and/or rehabilitation of existing rental housing to increase the availability of affordable rental housing for very low and low income households. A set aside of \$132,915.25 will be set aside for Burlington County's Community Housing Development Organization (CHDO).
4	Goal Name	Emergency shelter for victims of domestic violence
	Goal Description	Costs associated with the operation of an emergency shelter for victims of domestic violence and their children to include the provision of shelter, food, clothing, personal care items and case management services.
5	Goal Name	Infrastructure improvements
	Goal Description	Infrastructure improvements will improve availability and accessibility for low and moderate income people by removal of architectural barriers, flood drainage improvements, street improvements and sidewalk improvements.
6	Goal Name	Public facility improvements
	Goal Description	Improvements to public facilities to improve accessibility and availability by removal of architectural barriers, improvements to parks and recreational facilities, and community centers. Five projects are being funded under public facilities.

7	Goal Name	Senior centers
	Goal Description	Provide a public service at a senior center.
8	Goal Name	Transportation services
	Goal Description	Special transportation services for senior citizens and disabled residents.
9	Goal Name	Homelessness prevention and rapid re-housing
	Goal Description	Code Blue Shelter: Establish sheltering options that will transition into permanent housing and reduce reliance on motels; includes intensive case management.
10	Goal Name	Emergency home repair
	Goal Description	Correct conditions in owner-occupied homes that pose an immediate threat to the health or safety of occupants. Repairs are available to low and moderate income, owner-occupied (not income producing) dwellings located in participating municipalities.
11	Goal Name	Emergency heater replacement
	Goal Description	Replacement of heating systems of owner-occupied dwellings with energy-efficient systems.
12	Goal Name	Administration - CDBG
	Goal Description	Costs related to the administration of the Community Development Block Grant Program.
13	Goal Name	Administration - HOME
	Goal Description	Costs related to continuing administration of the HOME Investment Partnerships Program.

Projects

AP-35 Projects – 91.220(d)

Introduction

The process for developing the Program Year 2022 Annual Plan included the solicitation of comments during planning committee meetings, review of applications submitted to Community Development staff, review and approval by the General Advisory Committee, and public hearings to solicit comments on the Plan. Also, the review and approval by the Burlington County Board of County Commissioners.

Projects

#	Project Name
1	Emergency Heater Replacement
2	Emergency Home Repair
3	Home Improvement Loan
4	Housing Services
5	Rehabilitation Services
6	Providence House Catholic Charities
7	Sen Han Transportation
8	Food Bank
9	Catholic Charities Homeless Prevention
10	Burlington County Human Services

Table 7 - Project Information

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

No obstacles were noted.

AP-38 Project Summary
Project Summary Information

1	Project Name	Emergency Heater Replacement
	Target Area	
	Goals Supported	Emergency heater replacement
	Needs Addressed	Rehabilitation of owner-occupied homes
	Funding	CDBG: \$55,000
	Description	Replacement of Heating systems of owner-occupied dwellings with energy-efficient systems. Also, air conditioners if medically necessary.
	Target Date	9/30/2023
	Estimate the number and type of families that will benefit from the proposed activities	This program will benefit approximately 11 low and moderately low-income households.
	Location Description	The households eligible fall within the Urban Counties within Burlington County.
	Planned Activities	Replacement of Heating systems of owner-occupied dwellings with energy-efficient systems. Also, air conditioners if medically necessary
2	Project Name	Emergency Home Repair
	Target Area	
	Goals Supported	Emergency home repair
	Needs Addressed	Rehabilitation of owner-occupied homes
	Funding	CDBG: \$55,000
	Description	Correct conditions in owner-occupied homes that pose an immediate threat to the health or safety of occupants
	Target Date	9/30/2023
	Estimate the number and type of families that will benefit from the proposed activities	The program will assist approximately 11 low-income and moderately low-income households with the proposed activity.
	Location Description	The project activities will be located in the entitlements urban county within Burlington County.
	Planned Activities	Correct conditions in owner-occupied homes that pose an immediate threat to the health or safety of occupants
3	Project Name	Home Improvement Loan

	Target Area	
	Goals Supported	Housing rehabilitation
	Needs Addressed	Rehabilitation of owner-occupied homes
	Funding	CDBG: \$170,000
	Description	Provide a loan to owner-occupied homes to correct substandard conditions in their homes.
	Target Date	
	Estimate the number and type of families that will benefit from the proposed activities	The emergency home repair and home improvement loan program will create suitable living environments for approximately 12 low- and moderately-income households.
	Location Description	The project activities will be located in the entitlements urban county within Burlington County.
	Planned Activities	Provide a loan to owner-occupied homes to correct substandard conditions in their homes.
4	Project Name	Housing Services
	Target Area	
	Goals Supported	Housing rehabilitation
	Needs Addressed	
	Funding	CDBG: \$151,278
	Description	Services in support of affordable housing projects assisted by the CDBG Program. Services are related to assisting owners, tenants, contractors, and others participating or wishing to participate in the HOME Program
	Target Date	9/30/2023
	Estimate the number and type of families that will benefit from the proposed activities	The program will assist low-income and moderately low-income households.
	Location Description	The project activities will be located in the entitlements urban county within Burlington County.
	Planned Activities	Services in support of affordable housing projects assisted by the CDBG Program. Services are related to assisting owners, tenants, contractors, and others participating or wishing to participate in the HOME Program

5	Project Name	Rehabilitation Services
	Target Area	
	Goals Supported	Housing rehabilitation
	Needs Addressed	Rehabilitation of owner-occupied homes
	Funding	CDBG: \$151,000
	Description	Services related to the Home Improvement Loan Program, Emergency Home Repair, and Emergency Heater Replacement Program to assist owners and contractors in the loan program
	Target Date	9/30/2023
	Estimate the number and type of families that will benefit from the proposed activities	The program will assist low-income and moderately low-income households with the proposed activity.
	Location Description	The project activities will be located in the entitlements urban county within Burlington County.
	Planned Activities	Services related to the Home Improvement Loan Program, Emergency Home Repair, and Emergency Heater Replacement Program to assist owners and contractors in the loan program
6	Project Name	Providence House Catholic Charities
	Target Area	
	Goals Supported	Infrastructure improvements
	Needs Addressed	Homelessness assistance and prevention services
	Funding	CDBG: \$25,000
	Description	Costs associated with the operation of a 24-hour emergency housing hotline.
	Target Date	9/30/2023
	Estimate the number and type of families that will benefit from the proposed activities	Approximately 300 victims of domestic violence will be screened and assisted.
	Location Description	It is a hotline service and will be a voice-over-internet protocol.
	Planned Activities	It is a hotline service and will be a voice-over-internet protocol.
7	Project Name	Sen Han Transportation

	Target Area	
	Goals Supported	Transportation services
	Needs Addressed	Special needs transportation services
	Funding	CDBG: \$90,000
	Description	Provide special needs transportation services for senior citizens and disabled residents of Burlington County
	Target Date	9/30/2023
	Estimate the number and type of families that will benefit from the proposed activities	1,300 Senior persons and the disabled will benefit from this service.
	Location Description	The project will be available throughout Burlington County.
	Planned Activities	Provide special needs transportation services for senior citizens and disabled residents of Burlington County.
8	Project Name	Food Bank
	Target Area	
	Goals Supported	Homelessness prevention and rapid re-housing
	Needs Addressed	Homelessness assistance and prevention services
	Funding	CDBG: \$25,000
	Description	Food Boxes for low-income and moderately low-income households including seniors and disabled persons.
	Target Date	9/30/2023
	Estimate the number and type of families that will benefit from the proposed activities	This project will assist 95% of the eligible low and low-mod-income households.
	Location Description	The project activities will be located in the entitlements urban counties within Burlington County.
	Planned Activities	Food Boxes for low-income and moderately low-income households including seniors and disabled persons
9	Project Name	Catholic Charities Homeless Prevention
	Target Area	
	Goals Supported	Homelessness prevention and rapid re-housing

	Needs Addressed	Homelessness assistance and prevention services
	Funding	CDBG: \$25,000
	Description	Homeless prevention for low-income and moderately low-income persons who face a threat of homelessness with back rent, security deposit, first month's rent, and utility assistance.
	Target Date	9/30/2023
	Estimate the number and type of families that will benefit from the proposed activities	The program will assist approximately 35 low-income and moderately low-income households with the proposed activity.
	Location Description	The project activities will be located in the entitlements urban county within Burlington County.
	Planned Activities	Homeless prevention for low-income and moderately low-income persons who face a threat of homelessness with back rent, security deposit, first month's rent, and utility assistance.
10	Project Name	Burlington County Human Services
	Target Area	
	Goals Supported	Public facility improvements
	Needs Addressed	Homelessness assistance and prevention services
	Funding	CDBG: \$400,000
	Description	The project cost is to develop a non-congregate homeless shelter for the homeless that tracks quickly to permanency. The funding will be used for the project's hard and soft costs. Beneficiaries will be realized at later phases of the project.
	Target Date	9/30/2023
	Estimate the number and type of families that will benefit from the proposed activities	This project will assist homeless, chronically homeless, low-income, and very low-income persons in Burlington County. It is estimated that there are 117 chronically homeless persons in Burlington County, 62 are disabled, 35 are developmentally disabled, and 76 have chronic health conditions. There are 615 persons living below the poverty index in Burlington County. This is our target population.
	Location Description	This project will serve all qualifying persons from Burlington County.

	<p>Planned Activities</p>	<p>The project cost is to develop a non-congregate homeless shelter for the homeless that tracks quickly to permanency. The funding will be used for the project's hard and soft costs. Beneficiaries will be realized at later phases of the project.</p> <p>This project will assist homeless, chronically homeless, low-income, and very low-income persons in Burlington County. It is estimated that there are 117 chronically homeless persons in Burlington County, 62 are disabled, 35 are developmentally disabled, and 76 have chronic health conditions. There are 615 persons living below the poverty index in Burlington County. This is our target population.</p>
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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

As in previous years, the 2022 CDBG funding is directed to geographically assist the greatest number of people in need of housing and services and support activities that will improve low-income areas. Thirty (30) of the 40 municipalities in Burlington County’s jurisdiction have elected to participate with the County in its Housing and Community Development Programs. The non-participating municipalities are the Boroughs of Palmyra, Pemberton and Wrightstown, the Cities of Beverly and Burlington and the Townships of Mount Holly, Pemberton and Riverside. Eight of the non-participating municipalities plan to seek participation in the State-administered Small Cities Program as an alternative to the County’s CDBG Program. Funding under this plan for property improvements or municipal services is not made available to serve areas or residents in non-participating municipalities. However, public service activities that are designed to provide benefits on a county-wide basis do not exclude residents of these communities. Thirty-five (35) of the 40 municipalities have joined the HOME Consortium. The non-participating municipalities are Medford Lakes, Palmyra Borough, Pemberton Township, Springfield Township and Wrightstown Borough.

Geographic Distribution

Target Area	Percentage of Funds

Table 8 - Geographic Distribution

Rationale for the priorities for allocating investments geographically

The process as described was developed so that it allows for a fair distribution of funding throughout the jurisdiction. It is recognized that each municipality has its unique problems and is best suited to creatively solve the problems in partnership and consultation with the County’s Community Development and Housing Office.

Discussion

None noted

Affordable Housing

AP-55 Affordable Housing – 91.220(g)

Introduction

The development of affordable housing involves combining complicated funding sources and property development which usually will take two to three years to complete the project.

One Year Goals for the Number of Households to be Supported	
Homeless	22
Non-Homeless	5
Special-Needs	10
Total	37

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

One Year Goals for the Number of Households Supported Through	
Rental Assistance	0
The Production of New Units	22
Rehab of Existing Units	12
Acquisition of Existing Units	0
Total	34

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

Discussion

It is anticipated that 37 units of affordable housing will be created during the 2022 Program Year supported by HOME funds.

Assistance to First-Time Homebuyers for the purchase of their first home is expected to be provided to 17 first-time homebuyers.

AP-60 Public Housing – 91.220(h)

Introduction

There are no Public Housing units supported by Burlington County Housing Authority-Housing Choice Vouchers are provided in place of public housing units.

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

Not applicable.

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

Not applicable.

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

Not applicable.

Discussion

Not applicable.

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

Introduction

The Burlington County 10-Year Plan to End Homelessness codified the goals and objectives of the County to make significant strides in tackling its homeless population and included the following objectives:

1. Create a Single Point of Entry using a No Wrong Door by utilizing Coordinated Entry
2. Improve sheltering options that quickly track to permanent housing
3. Establish system coordination
4. Integrate services
5. Improve electronic and data monitoring
6. Monitor progress and prioritize subcomponent goals along with those large goals

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

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

The CoC Governing Board was formed in 2013 and established timeframes and guidelines to manage the continuum of care for homeless county residents. With regularly scheduled meetings, the Board has created sub-committees and has met many goals and objectives. These sub-committees operate and focus on a specific task, including but not limited to the formalization of Code Blue procedures, the Coordinated Assessment development and implementation, and the HUD Super NOFO McKinney-Vento application. HMIS Data Quality Committee meets bi-monthly and, through its efforts, has realized an 88% data accuracy rate for Burlington County's CoC. The Funding and Allocation Committee (Board) reviews and approves all applications and available funding.

The Governance Board continually monitors both the progress and the implementation of the Plan to ensure adherence to Federal and State guidelines. The Board continues to monitor the progress, analyze the goals of the program, and that objectives are being met. If agency guidelines and funding sources change, the board is poised to make adjustments to the Plan.

Addressing the emergency shelter and transitional housing needs of homeless persons

The CoC identified those agencies that provide emergency shelter housing access for those individuals experiencing homelessness. Those housing providers are an integral part of the Coordinated Assessment process.

These short-term, time-limited emergency housing beds would continue to be used for emergency

placements and assessment. Following a brief transition period, the households transition to permanent housing using the Rapid Rehousing model which has proven to be an effective tool.

Priority of commitment of HOME funds is given to developers of rental housing that agree to set aside at least five (5) units for Rapid Rehousing clients.

Previously, each agency established its intake procedures, and clients follow each agency's process multiple times to qualify for that particular program or service. Implementation of the coordinated assessment improves efficiency. Coordinated assessment, also known as coordinated intake, allows clients to move through the process faster and be matched according to their needs and eligibility. The Coordinated Assessment Tool is used to identify a target population and divert them from the shelters to a more appropriate permanent solution.

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 continue to contract for services through its Rapid Rehousing initiative. In addition, the County will identify and transition individuals/households using a housing first model

There are currently two (2) components to the Rapid Rehousing Initiative:

1. Social Services for the Homeless-The restructuring contract with Beacon of Hope and Christian Caring Center allocates funding to provide a Rapid Rehousing program for approximately 15 households per agency per year as funding is allocated through state funders. To date, this program has been effective and successful in transitioning homeless individuals and families into permanent housing and steady income through intensive case management services.
2. Intensive Case Management Program administered by Village Resources takes referrals from the Board of Social Services and successfully places individuals and households into permanent housing by facilitating stability.
3. The Housing HUB has been developed in Burlington County. This is a one-stop, no wrong door access point for people experiencing homelessness to be evaluated for services. Multiple service entities are present to work with the HUD staff and ensure that this is as successful as

possible. The HUB coordinates with the local Board of Social Services as well as the faith-based community services providers.

Utilizing qualified case management teams allows the County to work closely with the provider to develop a system of accountability and a permanent housing transition process that will improve monitoring of success in attaining permanent, sustainable housing and increasing income throughout the program.

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.

Plans to end homelessness have been driven by the belief that the most effective way to reduce homelessness is to prevent housing loss whenever possible. The Department of Human Services and the Continuum of Care have prevented housing loss through prevention subsidies and improved system coordination. The Mental Health Board has worked closely on discharge planning through the System review committee and includes representatives from the corrections facility, health care facilities and the homeless and mental health provider network.

County resources, Social Services for the Homeless funds, FEMA and Salvation Army all fund homelessness prevention activities which help to prevent homelessness through short-term or one-time support to help with back rent or utility payments. These dollars also pay for short-term shelter while people are evaluated for our rapid rehousing programs. By partnership these resources with improved coordination of a front door, the Continuum strives to improve long-term case management and supports for job training.

For individuals who are disabled, further support and coordination will be established through the SOAR initiative, which will target planning for individuals with disabilities to facilitate access to long-term benefits. Drug and alcohol, mental health, and homeless planning groups have begun meeting jointly to facilitate resource sharing and coordination.

In 2022 the focus of these coordinated efforts will be the following:

1. Preventing the loss of housing
2. Working towards permanent housing options for homeless individuals
3. Increased case management for those who need it

4. Clear transparent access to mental health and additions services.

Discussion

The Program Year 2022 focuses on coordinated efforts that will include the previous years' efforts as follows:

1. Housing First Creation of affordable housing, maintaining suitable affordable housing, creating accessibility to community-based public services. Working with our partners in the mental health field for ease of accessibility.

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

Introduction:

Not unexpectedly, Burlington County's greatest obstacles to serving those most in need of housing are cost and availability. Housing development costs, whether rehabilitation or new construction, continue to increase. Developable land in a densely populated area becomes ever scarcer.

Actions it planned to remove or ameliorate the negative effects of public policies that serve as barriers to affordable housing such as land use controls, tax policies affecting land, zoning ordinances, building codes, fees and charges, growth limitations, and policies affecting the return on residential investment

The Community Development and Housing Office will continue its education/outreach efforts by providing municipalities with assistance in identifying their options for addressing their "fair share" housing obligations.

Additionally, Burlington County's CoC continues to educate local officials on affordable housing issues to change misconceptions identified by service providers.

Discussion:

None noted

AP-85 Other Actions – 91.220(k)

Introduction:

Burlington County has specified as a priority goal the expansion and/or improvement of affordable housing stock, both rental and owner-occupied. To achieve this, strategies will be utilized as described further below.

Actions planned to address obstacles to meeting underserved needs

Rehabilitation of existing units to bring them up to HQS. The County's Home Improvement Loan Program, a zero-interest, deferred payment loan, will help existing homeowners bring their homes up to code. The program is funded with Community Development funds.

This Program is administered by the Community Development and Housing staff. This program provides funds to correct conditions in owner-occupied homes that pose an immediate threat to the occupants' health or safety.

Energy efficiency and its relationship to affordability will also be prioritized. The County intends to continue its funding of an emergency heater replacement program for low- and moderate-income homeowners. This program requires the installation of energy-efficient, "energy star" heating systems.

Actions planned to foster and maintain affordable housing

HOME Program funds will continue to be utilized to assist low- and moderate-income households in the purchase of a home by providing closing costs and down payment assistance to first-time homebuyers.

Funding under the HOME Program will be directed to activities that will increase the stock of affordable housing in the County with special priority given to locating housing options in low minority concentrated municipalities.

A balanced mix of affordable housing within non-low-income or minority concentrated areas has been identified as one of Burlington County's Fair Housing Plan's objectives to provide alternative housing opportunities for those residing in concentrated low-income areas. An additional objective in support of investments to improve housing within low-income and minority areas is to improve the quality of life and revitalize neighborhoods. Investment of HOME funds will be directed to achieve both objectives to the extent practicable.

Actions planned to reduce lead-based paint hazards

Lead-based paint hazard requirements are integrated into programs and projects administered or funded by the Housing and Community Development Office. The following activities are planned during fiscal year 2022 to ensure continued compliance:

Continue interaction with the County's Health Department to increase enforcement and reduce the duplication of efforts to reduce lead hazards in housing.

Evaluate program procedures related to lead-based paint regulations. Determine if adjustments are needed to maintain effective delivery of services and implement changes as needed.

Continue training of inspection staff as needed to maintain one full-time risk assessor.

Continue distribution of information on lead-based paint requirements to housing developers and construction contractors.

Continue to sponsor and distribute information on training programs to expand the inventory of certified "Safe Work Practices" and "Abatement" contractors.

Continue education for the public, particularly residents living in high-risk housing, about lead-based paint hazards and hazard prevention.

Actions planned to reduce the number of poverty-level families

The Burlington County Community Development and Housing Division, in collaboration with the Continuum of Care, the Burlington County Board of Social Services, and other Human Services Department divisions including but not limited to Behavioral Health, Employment and Training, and Veteran's Services will continue to coordinate with homeless providers and mainstream housing and service programs to provide case management, including counseling, addiction rehabilitation programs, and other life skills training. One goal of these programs is to increase program participants' ability to find and keep employment, allowing them to maintain housing and move from poverty to sustainable housing and income.

Actions planned to develop institutional structure

The Community Development and Housing Division will continue to work with various public service agencies, County divisions and departments, businesses, local municipalities, and special needs boards and commissioners to find opportunities to better further the goals and objectives proposed. These relationships are integral in streamlining the implementation of CDBG and HOME projects in a time of limited funding.

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

Limited funding available to address an array of housing and community development needs across substantial geography has led Burlington County to seek and strengthen collaboration with existing housing agencies, social service providers, cooperating municipalities, and other County departments.

The County plans to strengthen its relationships with homeless service providers through continued participation in the CoC, the Mental Health Board, and other social service providers.

Collaboration will also be encouraged among private housing developers, service providers, and other nonprofit agencies throughout the County. Improved communication and cooperation will allow for a more effective affordable housing strategy in which County efforts can build on those of the private/nonprofit sectors and vice versa.

Discussion:

None Noted

Program Specific Requirements

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

Introduction:

The grant year is July 1st through June 30th, the CDBG dollars will be programmed to stabilize Burlington County communities while following HUD regulatory standards noted in CFR.

Community Development Block Grant Program (CDBG)

Reference 24 CFR 91.220(l)(1)

Projects planned with all CDBG funds expected to be available during the year are identified in the Projects Table. The following identifies program income that is available for use that is included in projects to be carried out.

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

Other CDBG Requirements

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

**HOME Investment Partnership Program (HOME)
Reference 24 CFR 91.220(I)(2)**

1. A description of other forms of investment being used beyond those identified in Section 92.205 is as follows:

The funding for the construction and/or rehabilitation of affordable housing often requires that multiple sources of investment be utilized. Some of those anticipated investments include:

- Low Income Housing Tax Credits
- Deferred developer fees
- Historic Tax Credits
- Municipal Housing Trust Funds
- Permanent Mortgages
- Land donation and/or financial support from municipalities
- PILOT
- Cash investment from private parties

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:

Recapture provisions:

- First Time Homebuyers Program - provides both closing costs and down payment assistance. The recapture provision is enforced for the total loan amount during the affordability period and is reflected in recorded documents. Once the affordability period has been satisfied, the closing cost assistance is forgiven. The total amount of the down payment assistance remains subject to the recapture provision upon sale of the home.
- Developer Program - HOME assisted units to be sold to a qualified buyer are subject to enforcement of the recapture provision when the qualified buyer received a subsidy created by a discounted sales price from the fair market value and/or when the qualified buyer receives direct assistance such as down payment assistance and/or closing cost assistance. The homebuyer shall sign a recorded deed restriction. The affordability period made part of the deed restriction will be contingent upon the subsidy level. Upon sale of the property before satisfying the affordability period, the Recapture provision will be enforced as follows:

1. Owner Investment Returned First Recapture - from the sale proceeds, priority mortgage lien over the County's HOME loan lien shall be paid in full and any owner financially documented.

2. The HOME loan will be repaid based on the remaining net proceeds from the sale of the home. If no remaining net proceeds, the HOME loan will not be repaid to the County.

3. Upon receipt of the recaptured HOME funds, if any, the affordability restrictions are lifted.

4. Excess funds from the sale of the home will remain with the homeowner.

5. If the assisted unit is subject to foreclosure and no net proceeds from the sale of the property result, HOME guidelines are met.

6. Upon satisfaction of the affordability period, the HOME loan may then be forgiven and the deed affordability restriction is released and any other recorded documents are discharged. The owner of the property is then eligible to sell the property at a fair market price.

Resale provisions:

HOME Developer assisted units to be sold to a qualified buyer are subject to enforcement of the resale provision when the qualified buyer has not received any direct HOME subsidy and ensures that the HOME assisted property remains affordable for the entire affordability period and is enforced by an affordability deed restriction. The property must be sold to an income-qualified buyer approved by the County.

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 **Recapture provision** is enforced for the total loan amount during the affordability period and is reflected in recorded documents. The homebuyer shall sign a recorded deed restriction and/or any other document required by the County's legal counsel to ensure his/her understanding of the obligations and responsibilities upon the sale of the Home Assisted property. The affordability period is made part of the deed restriction and is contingent upon the subsidy level. Upon satisfaction of the affordability period, the HOME loan may then be forgiven and the deed affordability restriction is released and any other recorded documents are discharged.

The **Resale provision** is also enforced by the affordability deed restriction placed on the property. If the property is sold before satisfying the affordability period, the affordability restriction remains in effect. At the end of the affordability period, and the request of the property owner, the HOME loan may be forgiven and the affordability deed restriction will be released and any other recorded documents will be discharged.

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:

There are no plans for this activity.

None noted

