

HPG STATEMENT OF ACTIVITIES

The preapplication must include a statement of activities proposed by the applicant for its HPG program as appropriate to the type of assistance the applicant is proposing. The statement of activities must be published for public comment in a print or online newspaper and allow at least 15 days for public comment. The start of the 15-day period must occur no later than 16 days prior to the last day for acceptance of the preapplications by Rural Development, see § 1944.674. The statement of activities should include § 1944.676(b)(1) paragraphs (i) through (xvii):

(i) A complete discussion of the type of and conditions for financial assistance for housing preservation, including whether the request for assistance is for a homeowner assistance program, a rental property assistance program, or a cooperative assistance program.

The Community Action Council (the Council) will use Housing Preservation Grant funds to operate a Home Repair and Rehabilitation (HRR) program for households with low-income that have been deferred from the Council's Weatherization Assistance Program in Harrison and Nicholas Counties in Kentucky.

The Council's HRR program will operate in conjunction with its existing U.S. Department of Energy Weatherization Assistance and Low-Income Home Energy Assistance Program (LIHEAP) Weatherization programs, collectively referred to in this narrative as the Weatherization or WX program.

In order to qualify for the HRR program, households that own their own home must first apply for the Weatherization Assistance Program. If a home is deferred from WX due to repairs needed beyond the scope of WX services, a household may then qualify for the Housing Repair and Rehabilitation program.

Repairs to the home will be made using Housing Preservation Grant funds through the Home Repair and Rehabilitation program by a qualified contractor, then WX services will be performed in order to complete the home repair and energy efficiency modifications to the home.

For a dwelling unit to be eligible for weatherization assistance, it must be occupied by an individual/family who meets one of the following criteria:

1. Total annualized income of residents at or below 200% of the federal poverty level (FPL), or 60% of the Area Media Income (AMI); or
2. At least one household member must have received cash assistance payments under Temporary Assistance for Needy Families (TANF) or Kentucky Transitional Assistance Program (KTAP) sometime during the preceding 12 months prior to eligibility determination; or
3. At least one household member must have received Social Security Insurance (SSI) during the preceding 12 months; or
4. The applicant household has been verified as eligible for LIHEAP bill payment assistance within the preceding 12 months.

Funds will be distributed on a first come, first serve basis, with the expectation that the Council will be able to complete 15 homes over two years. Funds will be paid directly to the contractor; no funds will be paid directly to the homeowners.

(ii) The process for selecting recipients for HPG assistance, determining housing preservation needs of the dwelling, performing the necessary work, and monitoring/inspecting work performed.

Applicant income levels will be verified and documented using the most recent check stubs or Social Security award letters, checks or banking statements, LIHEAP applications, SNAP benefit documentation, or other similar program documentation. An intake worker with the Council will obtain all documentation during the application process.

In addition to income eligibility, all participants must reside in Harrison or Nicholas counties and must have a completed WX application on file with the Council. Applicants for WX services must complete a Weatherization application to assess household needs. This application includes documentation of ownership or landlord approval, income verification, and confirms applicant residency in the dwelling for which WX services are sought. Each application is scored based on the age of occupants and disability status, number of occupants, annual income, energy burden/cost, and fuel source. Units with young children present will receive a higher priority, as will households with a single elderly and/or disabled resident. Dwellings eligible for WX services will undergo, at a minimum, a walk-through by a certified QCI inspector to assess the interior and exterior of the building, including mechanical systems and building structure, as well as immediate surroundings. Units determined to be ineligible due to site conditions will be eligible for HRR program review at the Housing Services Unit (HSU) staff's discretion. The Council's HSU staff will review Harrison and Nicholas County-based deferrals and prioritize households that scored at least 30 points on the Weatherization application for HRR services. Units with seniors and/or disabled residents will receive a higher priority for HRR. HSU staff will coordinate with residents and contractors to obtain bids to perform the necessary repairs/rehabilitation identified during the WX deferral process. Units in which the bids indicate that repairs will exceed the \$5,000 maximum will be ineligible for HRR services.

Typical reasons for a unit to be deferred from WX services includes but is not limited to unresolved structural or mechanical (plumbing or electrical) issues or health and safety concerns, such as the presence of mold. Many homes may be deferred for minor issues found during the pre-inspection process.

When a unit qualifies for HRR services, the Council will engage the services of a qualified, licensed contractor to complete repair work on issues identified by the QCI inspector. Following completion of the work, the QCI inspector will review the work to ensure that the unit is ready for WX services. Another inspection will be conducted following WX services in accordance with program requirements.

(iii) The process for identifying potential environmental impacts, see § 1944.672 and historical places please see RD Instruction 2000-FF, available in any Rural Development Office.

The Council will address any potential environmental and historic preservation concerns before any work is performed on a unit recommended for HRR services. The Council will adhere to the reporting requirements outlined in subpart 1944.672 and RD Instruction 2000-FF to the RD office and the State Historic Preservation Office as necessary.

(iv) The development standard(s) the applicant will use for the housing preservation work; and, if not the Rural Development standards for existing dwellings, the evidence of its acceptance by the jurisdiction where the grant will be implemented.

The Council will meet USDA-RD standards for rehabilitation of an existing dwelling. The Council will also ensure that dwellings meet the WX inspection requirements. The Council has performed WX services in the proposed areas for more than a decade and has consistently met building standards.

(v) The time schedule for completing the program.

Funds will be expended over the 24 months following execution of the grant agreement. It is expected that five houses will be completed in the first 12 months and five houses completed in the second 12 months.

(vi) The staffing required to complete the program.

Mae Smalley, Housing Services Coordinator; Ms. Smalley has more than four years of experience in the administration and oversight of the WarmWise and WX programs.

Marty Jones, Director of Housing and Homeless Services; Mr. Jones has more than five years of experience in administration and oversight of the Council's housing services programs addressing energy efficiency needs for households with low income. He has more than 12 years of experience administering the Council's supportive housing programs, including its multiple projects funded under the Lexington and Balance of State Region 6 CoC, ESG, and HOME TBRA programs.

(vii) The estimated number of very low- and low-income minority and nonminority persons the grantee will assist with HPG funds; and, if a rental property or cooperative assistance program, the number of units and the term of restrictive covenants on their use for very low- and low- income.

All funds (or 100 percent) will be used to serve households with low- and very low-income. Based upon current program demographic information, the Council estimates a 3:1 ratio of minority-led households to non-minority-led households will be served, or roughly seven minority-led households and three non-minority-led households.

(viii) The geographical area(s) to be served by the HPG program.

The Council will use Housing Preservation Grant funds to serve homeowners with low-income in Harrison and Nicholas counties in Kentucky.

(ix) The annual estimated budget for the program period based on the financial needs to accomplish the objectives outlined in the proposal. The budget should include proposed direct and

indirect administrative costs; such as personnel, fringe benefits, travel, equipment, supplies, contracts, and other cost categories, detailing those costs for which the grantee proposes to use the HPG grant separately from non-HPG resources, if any. The applicant budget should also include a schedule (with amounts) of how the applicant proposes to draw HPG grant funds, i.e., monthly, quarterly, lump sum for program activities, etc.

Annual Budget: \$33,060.60

Total Grant Term Budget (two years): \$66,121.20

Monthly Draws (draw once per month for 24 months): \$2,755.05

Category	Budget
Personnel	\$ 3,160.65
Fringe	\$ 618.12
Contracts	\$ 25,000
Travel	\$ 1,965
Supplies	\$ 100
Indirect Costs	\$ 3,186.83
Total	\$ 33,060.60

(x) A copy of an indirect cost proposal when the applicant has another source of Federal funding in addition to the Rural Development HPG program.

Please see the attached indirect cost rate agreement.

(xi) A brief description of the accounting system to be used.

The Council adheres to all uniform administrative requirements, cost principles and audit requirements outlined in 2 CFR Part 200. The Council utilizes a fund accounting system (MIP Abila) to keep fund assets, including cash, separated and to track all expenditures and budgets.

(xii) The method of evaluation to be used by the applicant to determine the effectiveness of its program which encompasses the requirements for quarterly reports to Rural Development in accordance with 7 CFR 1944.683(b) and the monitoring plan for rental properties and cooperatives (when applicable) according to 7 CFR 1944.689;

The Council will report to Rural Development on a quarterly basis regarding program expenditures, activities, and home completions.

The Council does not anticipate performing work on rental properties.

(xiii) The source and estimated amount of other financial resources to be obtained and used by the applicant for both HPG activities and housing development and/or supporting activities.

The Council will leverage funds from the Department of Energy's Weatherization Assistance Program (WAP). The estimated leverage will be in the amount of approximately \$70,000. Leveraged funds will ensure that homes deferred from WAP service will be able to have required repairs completed and then receive Weatherization services.

(xiv) The use of program income; if any, and the tracking system used for monitoring same.

The Council does not anticipate any program income as expenditures will be dispensed as non-fungible grants to property owners.

(xv) The applicant's plan for disposition of any security instruments held by them as a result of its HPG activities in the event of its loss of legal status.

The Council will not take any security interest in any of the residences that receive home repair and rehabilitation services through this project. Owners will maintain the title to their property.

(xvi) Any other information necessary to explain the proposed HPG program.

N/A

(xvii) The outreach efforts outlined in 7 CFR 1944.671(b).

The Council will abide by the guidance outlined in 7 CFR 1944.671(b) regarding outreach. The Council regularly operates within Fair Housing requirements and annually submits a Title VI Civil Rights self-survey to the Kentucky Housing Corporation. The Council currently has a waiting list for the program but can add more households to the list.

The Council will retain records of outreach activities, including any newspaper, radio, or other media used to advertise the program. The Council will include the nondiscrimination slogan, "This is an equal opportunity program. Discrimination is prohibited by Federal Law" on all print material created to advertise the program.