

**State of South Carolina  
Consolidated Plan for Housing & Community Development**

**2025 Annual Action Plan**

Program Year: April 1, 2025- March 31, 2026

**Public Comment Draft  
December 2024**

*Community Development Block Grants  
HOME Investment Partnerships  
Housing Trust Fund  
HOME American Rescue Plan  
Emergency Solutions Grants  
Housing Opportunities for Persons with AIDS*

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## AP-05 Executive Summary

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

#### 1. Introduction

The South Carolina 2025 Annual Action Plan falls under the 2021-2025 State Consolidated Plan for Housing and Community Development. This 2025 Plan represents the fifth annual plan under the 2021-2025 five-year plan, and it encompasses the five regular programs annually funded by the US Department of Housing and Urban Development (HUD): The Community Development Block Grant Program (CDBG), the HOME Investment Partnerships Program (HOME), the National Housing Trust Fund Program (HTF), the Emergency Solutions Grants Program (ESG), and the Housing Opportunities for Persons with AIDS Program (HOPWA). A special allocation of ESG was authorized by HUD on 11/13/2024. This special allocation of Rapid Unsheltered Survivor Housing (RUSH) under ESG is in response to the President's major disaster declaration dated September 29, 2024.

For the 2025 Plan year, April 1, 2025 through March 31, 2026, South Carolina is projected to receive a funding level \$32.9 million for CDBG, HOME, ESG and HOPWA and \$3.1 million for HTF. ESG RUSH funds is for \$2,957,704. Method of distribution for each program is based on this estimate, and in the Method of Distribution section, each program has identified how the funding allocations amongst programs/activities will be revised when actual allocations are announced. This Plan identifies which of HUD's eligible activities have been prioritized as best able to serve the needs of South Carolina, using HUD funds that will be available during the 2025 Plan year.

The State will also be implementing separate Action Plans for other HUD funds and programs during the year.

- CARES Act funding for CDBG, ESG and HOPWA - received in 2020, CARES Act coronavirus (CV) funds were awarded to assist with preparation for and response to the COVID-19 pandemic. CV CDBG, HOPWA and ESG programs were incorporated by amendment in the 2020 Annual Action Plan. No new funding is expected for the 2025 Program Year; only CDBG-CV has funds remaining to be expended; and no CV funds are included in this 2025 Action Plan.
- HOME American Rescue Plan (ARP) Funding – South Carolina was allocated \$26.7 million in ARP funds in 2021 and a separate Allocation Plan was submitted and approved in 2023. Awards will be made during the 2025 Program Year. Only funding and summary information is included in this 2025 Action Plan.
- Recovery Housing Program (RHP) – South Carolina received RHP funding in 2021 and 2022. RHP also required its own Action Plan and reporting will be through HUD DRGR systems. RHP funding and goals are not included in this plan.
- ESG RUSH Funds—South Carolina was allocated \$2,957,704 in response to the President's major disaster declaration dated September 29, 2024. A substantial amendment to the 2024 Annual Action Plan was submitted to HUD December 2024 and is awaiting approval.

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The South Carolina Department of Commerce administers the CDBG Program; the State Housing Finance and Development Authority (SC Housing) administers the HOME Program, the HTF Program and the HOME ARP Program; the South Carolina Department of Administration Office of Economic Opportunity administers the ESG Program and ESG RUSH; and the South Carolina Department of Public Health (SC DPH) administers the HOPWA Program. The SC Office of Resilience administers the CDBG-MIT program, and the SC Department of Alcohol and Other Drug Abuse Services (DAODAS) administers RHP. The four State agencies managing the regular Con Plan programs collaborated to complete this Plan, along with the SCOR and input from other state agencies, stakeholders, advocates, and community members. The SC Department of Commerce is the lead agency for the Plan's development.

The Plan content and format is dictated by the federal online HUD IDIS system, through which all states and direct recipients of HUD Community Planning & Development funds must create Consolidated Plans and annual Action Plans, report on accomplishments, and create a Consolidated Annual Performance and Evaluation Report (CAPER) each year. The Annual Plan is generated through IDIS, then downloaded to make it available to the public and program participants and constituents. The structure and content reflect IDIS requirements. This current 2025 Annual Plan consists of this Executive Summary as well as two other sections: The Process Section, which describes the public input process for the 2025 program year, and the Annual Action Plan, which contains each Program's method of distribution for the year, anticipated goals and funding availability, as well as narrative sections addressing housing, special needs and homelessness.

### **2. Summarize the objectives and outcomes identified in the Plan**

HUD allows a broad range of activities for CDBG, HOME, HTF, ESG, ESG RUSH, HOPWA, HOME ARP, and CDBG-MIT. CDBG provides resources for community development, which may include public infrastructure, facilities and improvements; public services; clearance and other neighborhood and commercial revitalization oriented activities; and assistance to local governments to help locate new or expand existing business and create jobs. HOME is used for housing activities, which in any year may include providing homeownership and rental assistance; building or rehabilitating housing for rent or ownership for eligible households; and tenant-based rental assistance to subsidize rent for low-income persons. For 2025, HOME, HTF and HOME ARP funds will be used for construction of affordable rental housing. HOME will also be used for housing rehabilitation to create rental housing and short-term rental assistance in the form of security deposit assistance. ESG funds projects which may include supportive services to homeless individuals and families, outreach to unsheltered homeless, emergency shelter/transitional housing, homelessness prevention and re-housing assistance to those who have become homeless. ESG RUSH funds projects which may include supportive services to homeless individuals and families, outreach to unsheltered homeless, emergency shelter/transitional housing, homelessness prevention and re-housing assistance to those who have become homeless as it relates to Hurricane Helene in the affected counties of the President's major disaster declaration. HOPWA is dedicated to the housing and supportive service needs of people living with HIV/AIDS and their families, which may include operational support for community-based housing facilities operations; tenant based rental assistance; short-term payments for rent, mortgage and utilities; transitional housing assistance (leasing hotel/motel) and supportive services such as case management, substance abuse and mental health treatment, job training and placement assistance, and assistance with daily living. CDBG-MIT provides funds for mitigation activities that will

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increase resilience to natural disasters and reduce or eliminate long-term risk by lessening the impact of future disasters. Annual objectives and outcomes undertaken annually may include any of the following:

- New Affordable Rental Housing\*
- Rehabilitation to Create New Affordable Housing or Preserve Existing Affordable Housing
- Repair or reconstruct single family homeowner and rental housing affected by disasters\*\*
- Operating Funds for Facility-Based Housing Units
- Homeownership & Rental Assistance
- Tenant-based Rental Assistance
- Short-Term Rent, Mortgage & Utility Assistance
- HOPWA Transitional Housing Assistance (Leasing Hotel/Motel)
- Homeless Prevention & Rapid Re-Housing
- New or Upgraded Public Infrastructure and Improvements, Community Facilities & Services \*\*\*
- Hazard Mitigation Activities including Public Facilities Improvements and Acquisition\*\*
- Homeless Shelter, Services & Outreach
- Supportive Services for People with HIV/AIDs
- Downtown & Neighborhood Revitalization
- Community and Regional Planning
- Support New or Retention of Existing Jobs
- Community Economic Development

*\* Although HOME-ARP funds can be used for TBRA, supportive services, homeless prevention, housing counseling and non-congregate shelters, the needs assessment for ARP found that the best use of ARP funds allocated to South Carolina is the production of affordable rental housing.*

*\*\* CDBG-DR and CDBG-MIT – details can be found in the related Action Plans on the SC Office of Resilience website at <https://scor.sc.gov>.*

*\*\*\* CDBG-CV activities are being undertaken under the amended 2020 Action Plan and activities still underway include public services and public facilities to help address the impacts of the coronavirus pandemic. Details can be found in the 2020 Action Plan.*

### 3. Evaluation of past performance

The State is currently implementing the Annual Plan for Program Year 2024, which is the fourth year of the 2021-2025 Consolidated Plan period. Actual accomplishments for 2024 will be reported in July 2025, but past accomplishments are available for prior plan years. For 2023, the CDBG, HOME, ESG and HOPWA programs made a total of \$32.9 million available to recipients. HTF also received funding. These HUD funds could be used, in addition to other available resources, to address the state's priority needs and objectives. Distribution of funds was in accordance with each program's Annual Action Plan. The state's success in achieving its goals and objectives using the funds available for program year 2023 is described in the state's Consolidated Annual Performance and Evaluation Report (CAPER), which is available online at [www.cdbgSC.com](http://www.cdbgSC.com). Significant accomplishments were achieved by each program - below are highlights of 2023 performance and accomplishments.

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- 113,832 people benefited from community economic development activities aimed at improving or revitalizing commercial and downtown areas and upgrading essential public facilities for predominantly LMI communities
- 1,312 people benefited from neighborhood revitalization projects that will help improve public safety and revitalize predominately LMI residential neighborhoods
- 64,413 persons benefited from community infrastructure projects that will address the availability or quality of public water/sewer and other infrastructure to ensure a suitable living environment for predominantly LMI communities
- 47 new affordable rental units were funded
- 271 persons received rapid re-housing assistance through ESG
- 303 persons benefited from homelessness prevention activities through ESG and 8,614 homeless persons were assisted with overnight shelter and/or outreach activities through ESG
- 14 housing units for persons with HIV/AIDs were provided with operating funds through HOPWA
- HOPWA assisted 129 households with tenant based rental assistance and 236 eligible households with short-term rent, mortgage and utility assistance
- 1,396 HOPWA-eligible people received supportive services through HOPWA

#### 4. Summary of Citizen Participation Process and consultation process

The State certifies that it has adopted and is following the most current State Citizen Participation (CP) Plan. An Amendment to the State's CP Plan was required for CARES Act Funding and the amended State CP Plan was included in the Citizen Participation Process for the 2021-2025 Consolidated Plan. For the 2025 Program Year, the State is following the non-public health emergency provisions of the State CP Plan.

As amended, the CP Plan sets forth the State's policies and procedures for citizen participation and provides for and encourages citizens participation in the development of the Consolidated Plan, each Annual Action Plan, the State's Assessment of Fair Housing (when required by HUD for states), substantial amendments made to the Consolidated Plan, and each year's Consolidated Annual Performance Report.

Specific emphasis is placed on the participation of low and moderate income persons, including minorities, non-English speaking persons, persons with Limited English Language Proficiency (LEP), and persons with disabilities, and particularly on those living in slum and blighted areas and in areas where CDBG funds are proposed to be used, and by residents of predominantly low and moderate income neighborhoods.

The State is required to keep appropriate records, such as documentation of online postings of notices and drafts, newspaper notices of hearings, minutes of those public hearings, and responses to comments and inquiries, to demonstrate that the CP Plan is being followed. Specifically:

Requirement: Prior to the publication of the Action Plan, the State provided for local government and citizen participation by holding a virtual and/or in-person public hearing and made the proposed plan available for public review. At the public hearing, the State furnished citizens, local governments, public agencies, and other interested parties information on the following: amount of assistance the State expected to receive; the range of activities which may be undertaken, including the estimated amount that will benefit low and moderate income persons; and the plans to minimize displacement of persons

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and to assist any persons displaced.

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- ***The State will comply with its CP requirement by holding its 2025 public hearing on January 16, 2025, at which the amount of anticipated assistance, activities to be undertaken, the amount to benefit LMI and minimization of displacement was discussed. The State also made the draft Action Plan document available for public review from December 30, 2024 through January 28, 2025.***

Requirement: The State notified citizens about the dates of the Action Plan public comment period in at least one newspaper of general circulation in the state and utilize additional means of notification, as appropriate and using technology that may be available, including fax or email notifications and internet/web posting of notices. The advertised public notice and any other notices identified the means by which copies could be downloaded or otherwise obtained for review, and email and physical addresses for submitting comments.

- ***The State has provided public notice using one of the state's newspapers of general circulation , The State, by posting a copy of the notices online and by sending notifications via email and newsletters. This notice provided citizens with information regarding the availability of the Plan and each Program's documents, the date and location of the public hearing, and the timing of the 30-day public comment period. The notice also made citizens aware that they could download copies of the Plan from Program websites or review them at COG regional offices or one of the Program offices. Finally, the notice indicated where to send written comments and the deadline for doing so.***

### 5. Summary of public comments

During the public comment period, which ran from December 30, 2024 through January 15, 2025, the State made the draft plan available to the public for review. The State also held a public hearing, as a combination of virtual and in person, on January 16, 2025. Notice of the availability of the draft plan and the public hearing was published in The State on December 29, 2024 and also posted on [www.cdbgSC.com](http://www.cdbgSC.com). The notice provided instructions on how to provide comments regarding the Plan, and this will also be discussed during the public hearing. The public hearing provided an opportunity for citizens participating to make comments for the record.

Any comments received have been summarized in this final Plan, along with the State's responses.

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

Any comments received will be summarized in the final Plan, along with the State's responses.

### 7. Summary



## PR-05 Lead & Responsible Agencies

### PR-05 Lead & Responsible Agencies - 91.300(b)

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

The following are the agencies/entities responsible for preparing the Consolidated Plan and those responsible for administration of each grant program and funding source.

Agency Role	Name	Department/Agency
Lead Agency	SOUTH CAROLINA	SC Department of Commerce
CDBG Administrator	SOUTH CAROLINA	SC Department of Commerce
HOPWA Administrator	SOUTH CAROLINA	SC Dept of Public Health
HOME Administrator	SOUTH CAROLINA	SC Housing Finance & Development Authority
ESG Administrator	SOUTH CAROLINA	SC Office of Economic Opportunity
HOPWA-C Administrator		
Housing Trust Fund	SOUTH CAROLINA	SC Housing Finance & Development Authority
ESG RUSH Administrator	SOUTH CAROLINA	SC Office of Economic Opportunity

**Table 1 – Responsible Agencies**

#### Narrative

The HUD programs covered by the Consolidated Plan are administered by different agencies, as indicated above. The Community Development Block Grant (CDBG) Program is administered by the SC Department of Commerce, the HOME, HTF and HOME ARP Programs by the SC State Housing Finance and Development Authority (SC Housing), the Emergency Solutions Grant (ESG) Program and ESG Rapid Unsheltered Survivor Housing (RUSH) by the SC Office of Economic Opportunity and the HOPWA Program by the SC Department of Public Health (SC DPH). The Lead Agency responsible for overseeing the development of the Consolidated Plan is the SC Department of Commerce.

HOME ARP and the RHP Program are not included in this Consolidated Plan, because they have separate Action Plan requirements, data systems and reporting requirements. RHP is administered by the SC Department of Alcohol and Other Drug Abuse Services (DAODAS). The RHP Plans can be found on the DAODAS website at [SC-FY23-RHP-Application-FINAL.pdf](#) and [SC-FFY21-FY22-RHP-Application-REVISED.pdf](#).

## PR-05 Lead & Responsible Agencies

### Consolidated Plan Public Contact Information

General questions about the 2025 Action Plan should be directed to the SC Department of Commerce, which acts as the lead agency for the State. The SC Department of Commerce is located at 1201 Main Street, Suite 1600, Columbia, SC 29201. Phone (803) 734-0429 or email [cgriffin@scommerce.com](mailto:cgriffin@scommerce.com).

For housing questions or questions about HOME, HTF or the HOME ARP Program, contact SC Housing. Phone (803) 896-9824 or email [jennifer.cogan@schousing.com](mailto:jennifer.cogan@schousing.com).

For homeless questions, contact the SC Office of Economic Opportunity. Phone (803) 734-2454 or email [michele.dowlen@admin.sc.gov](mailto:michele.dowlen@admin.sc.gov).

For special needs housing and HIV/AIDS questions, contact the SC Department of Public Health HIV/STD Division. Phone (803) 898-0650 or email [outlawdj@dhec.sc.gov](mailto:outlawdj@dhec.sc.gov).

For non-housing or CDBG questions, or for referral regarding questions about CDBG-DR, CDBG-MIT or RHP, contact the SC Department of Commerce. Phone (803) 734-0429 or email [cgriffin@scommerce.com](mailto:cgriffin@scommerce.com).

## **AP-10 Consultation**

### **AP-10 Consultation - 91.110, 91.300(b); 91.315(l)**

#### **1. Introduction**

This Annual Plan is part of the larger five-year Consolidated Plan for 2021-2025. The Consolidated Plan is required and reflects the coordinated efforts of various state agencies, citizens, and other organizations. The Plan is a comprehensive report, spanning multiple cross-jurisdictional areas of need, involving multiple agencies, programs and funding sources, and beyond the ability of a single entity or person to effectively develop. Instead, the cooperation and expertise of other agencies was necessary to develop a comprehensive plan based on accurate and pertinent data, effectively identifying goals, needs and strategies, and which could serve as an umbrella under which the state can undertake HUD-funded housing and community development in South Carolina. As such the Consolidated Plan describes the consultation and coordination efforts undertaken by the state and which served to inform the plan that governs this current 2025 Annual Plan.

#### **Provide a concise summary of the state's activities to enhance coordination between public and assisted housing providers and private and governmental health, mental health and service agencies**

SC Department of Public Health staff responsible for administering the HOPWA Program also administer the Ryan White Care Act for the State, and Ryan White Care Act providers represent the entire spectrum of special needs housing, case management, health and mental health and other supportive services providers for people living with HIV/AIDs. Having the same entities manage programs and services funded by both HOPWA and Ryan White ensures a coordinated and seamless approach to service delivery. Additionally, SC DPH includes a requirement that each project sponsor applying for State HOPWA assistance obtain approval from the unit of local government thus ensuring that each geographic area is aware of HOPWA funding resources.

The SC Department of Alcohol and Other Drug Abuse Services (DAODAS) is the designated agency for RHP, and as a new program partner for the HUD Consolidated Plan, brings in another governmental health, mental health and service agency and related knowledge about State programs, services, and needs. DAODAS has developed significant partnerships that address the diverse needs of those entering and residing in recovery housing across South Carolina. Key partners include SCARR, OHI, S.C. Department of Commerce, S.C. Department of Corrections, as well as county alcohol and drug abuse authorities throughout the state. Many of these partners, existing and new, will be part of our advisory council for this

## **AP-10 Consultation**

program and serve as referring agencies. As experts in recovery housing and SUD treatment and recovery services, each entity and their respective designees bring a wealth of experience and knowledge to bear when serving the public. This system will develop a comprehensive network of partners in recovery housing to address the well-being of participants and promote long-term recovery.

In addition to the Consolidated Plan partner agencies identified in PR-05, numerous other state agencies, non-profit organizations, public housing authorities, and continuums of care contributed to the development of the Consolidated Plan. These are described in detail in the 2021-2025 Consolidated Plan.

### **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**

SC Office of Economic Opportunity staff responsible for the State Emergency Solutions Grant Program meet regularly with the State Continuums of Care to discuss homeless needs and strategies, as well as upcoming Annual Plans when appropriate, funding allocations between homeless services including outreach, shelter and transitional housing facilities and operations, homeless prevention and re-housing, and HMIS, as well as to align objectives and policies to achieve a more coordinated approach to addressing homeless needs in South Carolina. For ESG RUSH fund, HUD has waived COC Consultation for the initial allocation provided SC Office of Economic Opportunity published it will use the allocated funds. This notice is posted on SC Department of Commerce website and SC Office of Economic Opportunity website. In addition, coordination between SC Housing and organizations involved with homelessness and homeless prevention also began during development of the HOME ARP Allocation Plan and program.

### **Describe consultation with the Continuum(s) of Care that serves the State 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**

SC Office of Economic Opportunity staff responsible for the State Emergency Solutions Grant Program meet regularly with the State Continuums of Care to discuss homeless needs and strategies, as well as upcoming Annual Plans when appropriate, funding allocations between homeless services including outreach, shelter operations, homeless prevention and re-housing, and HMIS, as well as to align objectives and policies to achieve a more coordinated approach to addressing homeless needs in South Carolina. ESG also requires potential subgrantees to receive an endorsement letter from the Continuum of Care in their area in order to apply for ESG funds each year. To further coordinate, ESG attends the Homeless Coalition bi-monthly meetings, along with all the Continuums of Care, meets with each HMIS lead agency, attends policy meetings.

## AP-10 Consultation

### 2. Agencies, groups, organizations and others who participated in the process and consultations

<b>Agency/Group/Organization</b>	Organizations Consulted during Development of the 2021-2025 Plan
<b>Agency/Group/Organization Type</b>	Please see attachments to the Consolidated Plan
<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Public Housing Needs Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy Non-Homeless Special Needs HOPWA Strategy Market Analysis Economic Development Anti-poverty Strategy Lead-based Paint Strategy
<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	The state's 2021-2025 Consolidated Plan, AP-10 Consultation, Section 2 identifies fifty-six different organizations and the consultation the state had with them during the development of the Plan. Annually, State CDBG consults with the ten regional Councils of Government (COGs) at meetings held periodically during the year and has an ongoing dialogue throughout the year with the COGs and local governments in South Carolina. Application and Implementation Workshops held each year provide additional opportunities to discuss local and regional needs and issues with existing and potential CDBG grant recipients, interested local government officials and COG directors and community development staff.

**Table 2 – Agencies, groups, organizations who participated**

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

Please refer to the AP-10 Consultation Section in the state's 2021-2025 Consolidated Plan.

Many additional organizations, representing additional agency types, were consulted during the

**AP-10 Consultation**

development of the 2021-2025 Consolidated Plan, but IDIS limits the number of organizations that can be input into this section. As a result, not all are reflected in Section 2 of AP-10 of the Consolidated Plan. However, during the development of the Consolidated Plan, HOPWA consulted with Ryan White Care Act providers, via a public meeting focused on special needs housing.

**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	United Housing Connections	There are four Continuum of Care entities in SC and the State consulted with all four: Total Care for the Homeless Coalition (TCHC), Lowcountry Homeless Coalition, Midlands Area Consortium for the Homeless (MACH), and Upstate Continuum of Care, which also acts as the CoC Lead Organization. For consultation with the Lead and other CoC organizations, please see the narrative section below.

**Table 3 - Other local / regional / federal planning efforts**

**Narrative**

SC Office of Economic Opportunity staff responsible for the State Emergency Solutions Grant Program (ESG) meet regularly with the State Continuums of Care to discuss homeless needs and strategies, as well as upcoming Annual Plans when appropriate, funding allocations between homeless services including outreach, shelter operations, homeless prevention and re-housing, and HMIS, as well as to align objectives and policies to achieve a more coordinated approach to addressing homeless needs in South Carolina. ESG also requires potential subgrantees to receive an endorsement letter from the Continuum of Care in their area in order to apply for ESG funds each year. To further coordinate, ESG attends the Homeless Coalition bi-monthly meetings, along with all the Continuums of Care, meets with each HMIS lead agency, attends policy meetings and ESG staff volunteer for various Homeless Coalition committees.

Also, consultation with homeless assistance providers and Continuums of Care was part of the development of the plan for the HOME ARP Program. The HOME ARP Allocation Plan represented an amendment to the State’s 2021 Annual Action Plan and was approved by HUD in 2023. The State followed HUD guidance related to ARP plans and its own Citizen Participation Plan.

## AP-12 Participation

### AP-12 Participation - 91.115, 91.300(c)

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

Per the State of South Carolina’s Citizen Participation plan, input from the public and stakeholders was solicited by each of the five Consolidated Plan programs during the development of the 2021-2025 Consolidated Plan, which governs the current Action Plan. This is described fully in the Participation section of the State’s 2021-2025 Consolidated Plan.

In preparation for the 2025 Annual Action Plan, the state continued to consult as it does throughout the plan period with its program constituents and interested parties, via meetings with program constituents, workshops, etc. Input received was considered during the development of the 2025 Plan and will also be considered in finalizing the Plan prior to submission to HUD. The Plan was made available in draft form for public review for the 30 day period extending from December 30, 2024 through January 15, 2025. A public hearing will also be held on January 16, 2025 to discuss the 2025 Plan.

Consultation with homeless assistance providers and Continuums of Care also occurred regarding the HOME ARP Plan. The HOME ARP Allocation Plan represented an amendment to the State’s 2021 Annual Action Plan and was submitted in March 2023. The State followed HUD guidance for ARP and its own Citizen Participation Plan for amendments.

#### Citizen Participation Outreach

Mode of Outreach	Target of Outreach	Summary of response/ attendance	Summary of comments received	Summary of comments not accepted and reasons
Public Hearing	Non-targeted/broad community	The public hearing will be held on January 16, 2025. A public notice was published in three newspapers of general circulation and advertised the hearing, as did mailings to constituents and notices published on Program websites. Sign in sheets will be maintained in the Action Plan files to document attendance at the Public Hearing.	Two comments were received via email after the public hearing. The summarized question and response provided are in an attachment to this plan.	Not applicable.
Newspaper Ad	Non-targeted/broad community	Public notification ads were run in three newspapers of general circulation, in three regions of the state, on Sunday December 29, 2024. These ads announced the	No comments were received	Not applicable.

## AP-12 Participation

Mode of Outreach	Target of Outreach	Summary of response/ attendance	Summary of comments received	Summary of comments not accepted and reasons
		availability of the draft 2025 Annual Action Plan, the date, time and location of the public hearing to be held on January 16, 2025, and the start and end dates for the 30 days during which citizens and interested parties could provide written comments on the plan. There is no specific attendance, but the combined readership of The State, Greenville News, and Charleston Post & Courier is substantial and located throughout the state.		
Internet Outreach	Non-targeted/broad community	The SC Department of Commerce notified elected officials, local government administrators and other local government staff of the availability of the draft 2025 Plan and the 2025 public hearing via email on December 20, 2024. CDBG sent email notifications to more than 400 local government officials and staff in South Carolina, and to approximately 50 regional Council of Government Directors and staff.	No comments were received.	Not applicable.
Internet Outreach	Affordable Housing Partners, Applicants and Other Stakeholders	SC Housing notified affordable housing partners, applicants, and other stakeholders of the availability of the Draft 2025 Annual Action Plan via its mass email tool Constant Contact.	No comments were received.	Not applicable.
Other-public notice on websites	Non-targeted/broad community	The substantial amendment for ESG RUSH has been posted on South Carolina Department of Commerce website and South Carolina Office of Economic Opportunity website. These were posted as of 11/25/24.	No comments have been received.	Not applicable.

Table 4 – Citizen Participation Outreach



## AP-15 Expected Resources

### AP-15 Expected Resources – 91.320(c)(1,2)

#### Introduction

The State estimates it will receive its 2025 allocations for CDBG, HOME, HOPWA in the amount of \$32.8 million, plus \$4.3 million for HTF. The table below therefore reflects estimated funding for the regular CPD programs.

Note that HOME ARP, CDBG-MIT, and RHP are included as funding sources, even though each of these funding sources are being administered under separate Annual Action Plans. The disaster and RHP funds have already been awarded, including additional MIT funding awarded during 2021. As of June 2024, the SC Office of Resilience has finalized all HUD reporting on the CDBG-DR funds and concluded the grant program. No additional disaster funding is expected during the remainder of the 2021-2025 Consolidated Plan period. Additional MIT or disaster funding, should it be awarded for mitigation or disasters that may occur during the Con Plan period, will be shown in the same way with the amounts further incremented. RHP was initially a pilot program in FY 2020-2021 and funding was also received for 2022.

CDBG-CV is not included in the table below as CV funds were awarded under the prior Consolidated Plan and no additional funds are anticipated for the current 2021-2025 plan period.

#### Anticipated Resources

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of Con Plan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources : \$	Total: \$		
CDBG	public – federal	Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services	19,809,810	0	0	19,809,810	0	This is the fifth annual plan for the current 5-year Consolidated Plan period. Additional CDBG funds are estimated at \$20 million per year.

## AP-15 Expected Resources

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of Con Plan \$	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 Short-Term Rental Assistance	6,384,238	6,967,683	6,967,683	22,590,745	0	This is the fifth annual plan for the current 5-year Consolidated Plan period. Additional HOME funds are estimated at \$7 million per year.
HTF	public – federal	Multifamily rental new construction Multifamily rental rehab	3,144,833	30,000	2,830,350	6,005,183	0.00	This is the fifth annual plan for the current 5-year Consolidated Plan period. Additional HTF funds are estimated at \$3 million per year.
HOPWA	public – federal	Permanent housing in facilities Permanent housing placement Short term or transitional housing facilities STRMU Supportive services TBRA	2,992,153	0	500,000.00	3,482,153.0	2,000,000	This is the fifth annual plan for the current 5-year Consolidated Plan period. Additional HOPWA funds are estimated at \$2 million per year.

## AP-15 Expected Resources

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of Con Plan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources : \$	Total: \$		
ESG	public – federal	Rehabilitation or conversion of buildings for use as emergency shelter for the homeless, payment of certain expenses related to operating emergency shelters, essential services related to emergency shelters and street outreach, for homeless prevention, rapid re-housing assistance, and the data collection in Homeless Management Information System (HMIS).	2,400,000	0		2,400,000	0	This is the fifth annual plan for the current 5-year Consolidated Plan period. Additional ESG funds are estimated at \$2.4 million per year.
RUSH-ESG Disaster Relief Grant	Public-federal	Rehabilitation or conversion of buildings for use as emergency shelter for the homeless, payment of certain expenses related to operating emergency shelters, essential services related to emergency shelters and street outreach, for homeless prevention, rapid re-housing. As these things are related to President’s disaster declaration September 29, 2024.	\$2,957,704	\$0		\$2,957,704	\$0	To address the needs of homeless individuals or families or individuals or families at risk of homelessness in areas affected by a major disaster declared pursuant to the Robert T. Stafford Disaster Relief and Emergency Assistance Act (42 U.S.C. 5121 et seq.) on or after December 20, 2019, whose needs are not otherwise served or fully met by existing Federal disaster relief programs, including the Transitional Sheltering Assistance (TSA) program under such Act (42 U.S.C. 5170b). This allocation

**AP-15 Expected Resources**

								of "Rapid Unsheltered Survivor Housing" (RUSH) funding under the ESG Program is in response to the President's major disaster declaration dated September 29, 2024, DR-4829-SC, for Hurricane Helene, and Federal Emergency Management Agency's (FEMA) determination that this disaster was severe enough to activate its TSA program.
CDBG-MIT	Public – federal	Acquisition Public Infrastructure	162,188,000	0		162,188,000	0	CDBG-MIT funding was received for Hazard Mitigation, including a second round of \$4,598,000 in 2021. The amount shown indicates the total awarded to South Carolina.
RHP	Public – federal	TBRA	1,150,177.0	0		1,150,177	0	RHP funding was received for recovery housing activities for 2022. Funding may be used for a variety of recovery housing activities but will be used for recovery housing rental assistance.
HOME ARP	Public – federal	Production or Preservation of Affordable Housing	26,687,296	0		26,687,296	0	HOME ARP funds were allocated to the State to assist individuals or households who are homeless, at risk of homelessness, and other vulnerable populations.

**Table 5 - Expected Resources – Priority Table**

## **AP-15 Expected Resources**

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

A number of other resources, including other federal, private, non-profit, local and state programs, can be used to address housing, community development and special needs. Much of the funding for housing and community development programs in particular originates from federal sources. Programs including HOME, HTF, CDBG, Low Income Housing Tax Credits (LIHTCs), Section 8 rental assistance programs and Low Income Home Energy Assistance (LIHEAP), are allocated to states based on formulas. Other federal programs are available on a demonstration basis or through a competitive process on a national or regional level, and as such are more difficult to obtain and less secure as a long-term funding source.

State resources for housing include the various programs and the State Housing Trust Fund administered by SC Housing, which are described below. In addition, HUD requires the State to provide matching funds for the CDBG, HOME, and ESG Program allocations, as described below. The HOPWA nor HTF programs do not require a match from the State of South Carolina for their allocation. ESG RUSH funds do not require matching funds.

#### **CDBG-MIT**

In April 2018, HUD announced an allocation of \$157.6 million in CDBG Mitigation (CDBG-MIT) funds to South Carolina. During 2021, the State received an additional MIT allocation of \$4,598,000 bringing total MIT funding for South Carolina to \$16,188,000. The State's CDBG-MIT Action Plan, as amended for the additional funding, is posted on the SC Office of Resilience (SCOR) website at <https://scor.sc.gov/>. These funds will be used for acquisition and public infrastructure improvements needed to improve resiliency and reduce the future impacts of natural disasters.

#### **RHP**

The Recovery Housing Program (RHP) provides funding to provide stable, transitional housing for individuals in recovery from a substance use disorder. The funding covers a period of not more than two years or until the individual secures permanent housing, whichever is earlier. The SC Department of Alcohol and Other Drug Abuse Services (DAODAS) administers these funds, and there are separate planning and reporting requirements for this program. In FY 2022-2023 and \$1.15 million was received and \$1.2 million has been allocated for FY2023-2024

## **AP-15 Expected Resources**

### **HOME ARP**

The American Rescue Plan (ARP) provides funding to assist individuals or households who are homeless, at risk of homelessness, and other vulnerable populations, by providing housing, rental assistance, supportive services, and non-congregate shelter, to reduce homelessness and increase housing stability across the country. South Carolina was allocated \$26,687,296 in ARP funds in 2021, and the SC HOME-ARP Allocation Plan was approved in March 2023 as an amendment to the State's 2021 Annual Action Plan. Only funding and summary information is included in this 2024 Plan.

### **HOME**

The HOME program requires a 25 percent (25%) match. HOME program matching funds are provided by SC Housing through the State Housing Trust Fund. The SC HTF is a state-funded program created in 1992 to assist low-income households in all 46 counties. The fund receives a small portion of all documentary stamp taxes collected.

### **ESG**

The ESG Program requires a dollar-for-dollar match in non-ESG funds from the State for their allocation. To meet this requirement, the ESG Program requires that applicants provide a dollar-for-dollar match if they are awarded a grant. Match can be either in the form of a cash contribution or in other donated/in-kind resources such as the value of buildings, equipment, and volunteer services. The State is allowed to waive the match requirement for up to the first \$100,000 of its allocation for applicants who are least capable of leveraging local resources to meet the match.

### **HOPWA**

HOPWA does not require matching funds, but HOPWA funds awarded each year are the source of substantial leveraging. All SC DPH HOPWA service providers, or sponsors, are also Ryan White service providers or collaborate closely with Ryan White service providers. HOPWA Project Sponsor also leverage other resources to provide the most comprehensive housing and support services possible. During the 2023-2024 grant year, HOPWA Project Sponsor who also served as Ryan White Part B provides expended more than \$2.1 million of Ryan White formula funds on case management and housing services.

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

The State does not own any land or property that may be used to address the needs identified in the plan.

### **Discussion**

## AP-20 Annual Goals & Objectives

### AP-20 Annual Goals and Objectives – 91.320(c)(3)&(e)

#### Goals Summary Information

Goal #r	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	2025 Estimated Funding	Proposed 2025 Goal & IDIS Outcome Measure
1a	New Affordable Rental Housing	2021	2025	Affordable Housing		Affordable Housing	HOME: \$16,314,240 Housing Trust Fund: \$5,438,080	Rental units constructed: 40 Household Housing Unit
1b	Preserve Existing Affordable Housing	2021	2025	Affordable Housing		Preservation of Existing Affordable Housing	HOME: \$5,438,080 HTF: 1,415,174	Rental units rehabilitated: 12 Household Housing Unit
2	Operating Funds for Facility-Based Housing Units	2021	2025	Affordable Housing Non-Homeless Special Needs		Transitional and Supportive Housing	HOPWA: \$241,428.00	HIV/AIDS Housing Operations: 10 Household Housing Unit
3	Tenant-based Rental Assistance for Special Needs Households	2021	2025	Affordable Housing Non-Homeless Special Needs		Rental Assistance	HOPWA: \$883,500	Tenant-based rental assistance / Rapid Rehousing: 126 Households Assisted
4	Short-Term Rental Assistance (HOME Rental Assistance & HOPWA STRMU - Short Term Rent, Mortgage & Utility Assistance)	2021	2025	Affordable Housing Non-Homeless Special Needs		Rental Assistance and Transitional Housing Assistance (HOPWA hotel/motel)	HOPWA: \$704,283 HOME \$200,000	Tenant-based rental assistance-100 / Rapid Rehousing: 606 Households Assisted

## AP-20 Annual Goals & Objectives

Goal #r	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	2025 Estimated Funding	Proposed 2025 Goal & IDIS Outcome Measure
5	Homeless Prevention & Rapid Re-Housing	2021	2025	Homeless		Homeless Prevention and Rapid Re-Housing	ESG: \$607,623.26 ESG RUSH: \$1,031,438	Tenant-based rental assistance / Rapid Rehousing: ESG-100, RUSH-100, Households Assisted Homelessness Prevention: ESG-175 and RUSH-175 Persons Assisted
6	Homeless Shelter, Services & Outreach	2021	2025	Homeless		Homeless Services and Outreach to Unsheltered Homeless	ESG: \$1,371,330.40 ESG RUSH: \$1,774,622.38	Homeless Person Overnight Shelter: ESG-1,000 and RUSH-1,000  Persons Assisted Other -Outreach: ESG-1,000 and RUSH-1,000
7	Supportive Services for People with HIV/AIDs	2021	2025	Non-Homeless Special Needs		Supportive Services for People Living with HIV/AID (including Permanent Housing Placement)	HOPWA: \$1,325,711	Other - Supportive Services: 1,502 Other (Persons Assisted)
8	Public Infrastructure, Facilities & Services	2021	2025	Non-Housing Community Development		Community Infrastructure, Facilities & Services	CDBG: 9,000,000	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 7,000 Persons Assisted



## AP-20 Annual Goals & Objectives

Goal #r	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	2025 Estimated Funding	Proposed 2025 Goal & IDIS Outcome Measure
9	Community Sustainability and Opportunity	2021	2025	Non-Housing Community Development		Community Infrastructure, Facilities & Services Community Revitalization Economic Opportunity & Sustainability	CDBG: \$8,615,516	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 8,000 Persons Assisted
10	New or Jobs Retention of Existing Jobs	2021	2025	Economic Opportunity		Economic Opportunity & Sustainability	CDBG: \$1,000,000	Jobs created/retained: 25 Jobs
11	Community and Regional Planning	2021	2025	Non-Housing Community Development		Community Infrastructure, Facilities & Services Community Revitalization Economic Opportunity & Sustainability	CDBG: \$500,000	Other: 40 Other
12								
13	CDBG-MIT Mitigation	2021	TBD	Hazard Mitigation and Resiliency		Community Infrastructure, Facilities & Services Disaster Response & Hazard Mitigation	CDBG-MIT \$157,590,000	Other: 128 Other (Plans, FEMA Match, Acquisition and Public Facilities Projects)
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**Table 6 – Goals Summary**

## AP-20 Annual Goals & Objectives

### Goal Descriptions

1a	<b>Goal Name</b>	New Affordable Rental Housing
	<b>Goal Description</b>	Increase the supply of affordable rental units for extremely low- to moderately low-income households.
1b	<b>Goal Name</b>	Preserve Existing Affordable Housing
	<b>Goal Description</b>	Increase the supply of affordable rental units for extremely low- to moderately low-income households, through projects involving rehabilitation. Or make existing affordable housing more sustainable and preserve affordable housing stock. HTF funds are allocated for this goal for 2021, but CDBG neighborhood revitalization projects can include this activity, as can water/sewer infrastructure projects. Rehabilitation Standards for HTF are included in this Plan.
2	<b>Goal Name</b>	Operating Funds for Facility-Based Housing Units
	<b>Goal Description</b>	Support transitional and supportive housing facilities for people with special needs.
3	<b>Goal Name</b>	Tenant-based Rental Assistance for Special Needs Households
	<b>Goal Description</b>	Provision of tenant-based rental assistance to make housing more affordable for those living with HIV/AIDS and for other low income households with other special needs. Funding for this activity is provided by HOPWA.
4	<b>Goal Name</b>	Short Term Rental Assistance (HOPWA STRMU -Short-Term Rent, Mortgage & Utility Assistance)
	<b>Goal Description</b>	Address short-term housing instability by providing emergency assistance for people living with HIV/AIDS (HOPWA) or short-term rental assistance in the form of security deposit assistance through the SC Housing Rental Division (HOME).
5	<b>Goal Name</b>	Homeless Prevention & Rapid Re-Housing
	<b>Goal Description</b>	Prevent homelessness and/or assist with rapid re-housing or transition to permanent housing.
6	<b>Goal Name</b>	Homeless Shelter, Services & Outreach
	<b>Goal Description</b>	Support organizations that provide emergency shelter or essential supportive services to homeless individuals and families, both sheltered and unsheltered, and/or that provide outreach to unsheltered homeless.
7	<b>Goal Name</b>	Supportive Services for People with HIV/AIDs (including Permanent Housing Placement)
	<b>Goal Description</b>	Provide supportive services and permanent housing placement services to persons with special needs to promote independent living.
8	<b>Goal Name</b>	Public Infrastructure, Facilities and Services
	<b>Goal Description</b>	Contribute to community quality of life by providing funding for new or upgraded infrastructure, facilities or services, including water, sewer, roads, drainage or other activities that address health concerns or resiliency, help meet required quality standards and ensure community sustainability, contribute to a more viable regional infrastructure solution, provide new access to services where needed to support business or community needs where it is cost effective to do so.

## AP-20 Annual Goals & Objectives

9	<b>Goal Name</b>	Community Quality of Life, Sustainability and Opportunity
	<b>Goal Description</b>	Help improve quality of life and create more viable communities offering local residents greater quality of life and individual economic opportunity. The CDBG Community Enrichment and Local Priorities Programs are the primary tools for accomplishing this by funding public facilities, services and other activities that strengthen and revitalize existing communities, make them more resilient and sustainable and support a higher quality of life.
10	<b>Goal Name</b>	New Jobs or Retention of Existing Jobs
	<b>Goal Description</b>	Support the creation or retention of jobs as a means of providing or expanding economic opportunity in the form of jobs to primarily low- and moderate-income individuals. The CDBG Business Development Program is the primary tool for accomplishing this by providing financial resources for local governments to pursue opportunities that create new jobs, retain existing employment, stimulate private investment, and revitalize or facilitate the competitiveness of the local economy.
11	<b>Goal Name</b>	Community and Regional Planning
	<b>Goal Description</b>	Assist local governments in developing plans and building local community development capacity to build the capacity to effectively determine community needs, establish both long-term goals and short-term objectives, and develop plans for carrying out effective strategies to address community needs. Accomplishments are measured in terms of the number of communities assisted.
13	<b>Goal Description</b>	<p>CDBG-MIT Hazard Mitigation</p> <p>CDBG-MIT activities will include: a) various types of infrastructure improvements and related planning to improve resiliency and reduce flood risk, b) matching funds for FEMA assistance, and c) acquisition of contiguous residential parcels of land for uses compatible with open space, recreational, natural floodplain functions, wetlands management practices, or ecosystem restoration. The acquired property will be subject to a permanent covenant on its continued use to preserve the floodplain. The term “buyout” refers to the acquisition of properties with the intent to reduce risk from future flooding.</p> <p>For infrastructure projects, Phase 1 will include planning funds to assist jurisdictions without “shovel-ready” projects in the development of flood-reduction studies with the intent of identifying appropriate projects for execution during Phase 2. Phase 2 will commence at the start of year 3.</p>

**Estimate the number of extremely low-income, low-income and moderate-income families to whom the jurisdiction will provide affordable housing as defined by HOME 91.215(b)**

Extremely Low-Income - 10 households  
 Low-Income - 10 households  
 Moderately Low-Income - 10 households

## AP-25 Allocation Priorities

### AP-25 Allocation Priorities – 91.320(d)

#### Introduction:

Each Program has identified various programs or activities that will be funded during 2025, and that will directly contribute toward achieving the goals defined in this plan. Funding for each of these programs or activities are described in program-specific sections of AP-30, Method of Distribution. Each program's Method of Distribution section also: describes other, allowable set-asides for program administration and other activities related to program delivery and demonstrates compliance with the program caps for these activities. Such activities include program administration, technical assistance (CDBG), CHDOs (HOME), sponsor administration (HOPWA), and administration and HMIS (ESG) and ESG RUSH.

The percentages below reflect the relative share of 2025 funding for each program or activity to be funded in 2025. Note that these percentages are calculated *after* allowable set-asides have been deducted from the total allocation. These total 100%, indicating that, after allowable set-asides, all 2025 estimated funding to be awarded will help achieve one of the program goals identified in this Annual Action Plan. The table below and each Program's Method of Distribution reflect the estimated 2025 allocations and has been updated along with the Resources and Goals sections, as described for each Program.

The set-aside activities are not included in the table below, which is automatically generated by IDIS and which cannot be modified by the State other than the percentages for the IDIS-generated columns and rows. These activities are, however, described in AP-30, Method of Distribution. All comply with pertinent program regulations and caps, as described in AP-30.

CDBG-MIT and HOME ARP are not included in the tables below. The CDBG-MIT Plan can be found on the SC Office of Resilience website at <https://scor.sc.gov/>.

## Funding Allocation Priorities

	New Affordable Rental Housing (%)	Operating Funds for Facility-Based Housing Units (%)	Preserve Existing Affordable Housing (%)	Tenant-based Rental Assistance (%)	Short-Term Rental Assistance & HOPWA STRMU (%)	Homeless Prevention & Rapid Re-Housing (%)	Homeless Shelter, Services & Outreach (%)	Supportive Services for People with HIV/AIDs (%)	Public Infrastructure, Facilities & Services (%)		Community Sustainability & Opportunity (%)	New Jobs or Retention of Existing Jobs (%)	Community and Regional Planning (%)	Total (%)
CDBG	0	0	0	0	0	0	0	0	47		45	5	3	<b>100</b>
HOME	75	0	24	0	1	0	0	0	0		0	0	0	<b>100</b>
HOPWA	0	6	0	26	20	0	0	48	0		0	0	0	<b>100</b>
ESG	0	0	0	0	0	40	60	0	0		0	0	0	<b>100</b>
HTF	75	0	25	0	0	0	0	0	0		0	0	0	<b>100</b>
HOME ARP	100	0	0	0	0	0	0	0	0		0	0	0	<b>100</b>
ESG-RUSH						40	60							<b>100</b>

**Table 7 – Funding Allocation Priorities**

	Housing Rehabilitation	Public Improvements	Homeless Assistance	Total (%)
CDBG-MIT		100		<b>100</b>
RHP			<b>100</b>	<b>100</b>

## **AP-25 Allocation Priorities**

### **Reason for Allocation Priorities**

The CDBG, HOME and HTF ESG and ESG-RUSH programs for 2025 are designed to address the three priority needs, Decent Housing, Suitable Living Environment, and Economic Opportunity. Allocation priorities are based on expected funding and program evaluation of relative need amongst the related objectives identified in the Plan.

### **HOME ARP**

American Rescue Plan funding required a separate Allocation Plan which was approved by HUD in May 2023. The State received \$26.7 million which can be used for ARP eligible activities to assist individuals or households who are homeless, at risk of homelessness, and other vulnerable populations, by providing housing, rental assistance, supportive services, and non-congregate shelter, to reduce homelessness and increase housing stability. Eligible activities include Production or Preservation of Affordable Housing, Tenant-Based Rental Assistance (TBRA), Supportive Services, Homeless Prevention Services, Housing Counseling, and Purchase and Development of Non-Congregate Shelter. However, the allocation priority for South Carolina, based on the needs assessment conducted, is the development of affordable rental housing.

### **HOME**

HOME funding will be made available for new construction and rehabilitation of rental developments, and tenant based rental assistance. Both HOME and HTF dollars will be made available in the Authority's Small Rental Development Program (SRDP). This Method of Distribution will directly impact priority needs and help accomplish goals and objectives.

### **HOPWA**

SC DPH allocates funding for TBRA, Facility based Supportive Housing, STMRU, PHP, and Supportive Housing. Each of these are successful in preventing homelessness of persons with HIV.

### **How will the proposed distribution of funds will address the priority needs and specific objectives described in the Consolidated Plan?**

### **CDBG**

Each year, the State establishes programs under which CDBG funds for the year will be distributed, generally through a competitive funding process. The programs, and the project types and activities eligible under each program, are those that reflect eligible uses of CDBG funding and that will help address priority needs and specific objectives described in the Consolidated Plan. However, as required by the State's

## **AP-25 Allocation Priorities**

method of distribution, CDBG funds are actually distributed to local governments through competitive funding rounds for most programs, and these local governments, if successful in receiving funding, then actually carry out the activities identified in the Consolidated Plan, in accordance with applicable program requirements. In this way, the State makes CDBG funds available for priority activities identified in the Consolidated Plan that will directly impact priority needs and help accomplish goals and objectives.

Specific activities to be undertaken, however, are determined by the application process and the specific projects and activities proposed by the highest scoring applicants for CDBG funding. Applications received and projects awarded funding each year are described in the Consolidated Annual Performance and Accomplishment Report or CAPER. For more detailed information on the types of eligible activities, as well as the method of distribution for each program, refer to the program documents on the CDBG website at [www.cdbgSC.com](http://www.cdbgSC.com).

### **HOME and HTF**

SC Housing develops annual applications in support of providers who conduct activities to address the priority needs and specific objectives as described in this plan. HOME and HTF funds are distributed to local governments, nonprofit organizations, and other entities to carry out the activities identified in the Consolidated Plan, in accordance with applicable program requirements. Each year, funds are made available for some or all of the priority activities identified in the Strategic Plan, as indicated in the HOME and HTF Method of Distribution sections and program documents that be found on the State Housing website at [www.schousing.com](http://www.schousing.com). Specific activities to be undertaken by HOME and/or HTF recipients of funds are subject to the projects represented by applications received and program funding award decisions.

### **ESG**

Although states can award ESG Program funding to various recipients types, including non-profits and local governments, the South Carolina ESG Program has opted to award funding only to non-profit organizations. All 501(c)3 non-profits registered in the state of South Carolina are eligible to apply. South Carolina Office of Economic Opportunity holds a competitive application process and enters into grant agreements with approved applicants who already provide ESG services or ESG related services to the homeless and those at risk of becoming homeless. The approved applicants become subrecipients for funding in outlined components or emergency shelter, street outreach, rapid re-housing, homeless prevention and/or HMIS. While applicants may request funds for multiple service components, each service component proposed in an application is individually considered for an award of funds.

## **AP-25 Allocation Priorities**

### **HOPWA**

SC DPH serves all areas of the state except the two areas that are HOPWA entitlement communities (Columbia, Charleston and Greenville) and the counties that fall in North Carolina and Georgia HOPWA entitlement communities. SC DPH distributes the funds to regional Ryan White Care Providers and/or eligible non-profit organizations that assist persons living with HIV/AIDS. Housing assistance through STRMU, PHP, and TBRA, and short term temporary housing (hotel, motel, transitional housing) increases client's housing stability. Increasing use of supportive services in order to assist individuals in maintaining housing stability are critical and includes case management and transportation.



## AP-30 Methods of Distribution

### AP-30 Methods of Distribution – 91.320(d)&(k)

#### Introduction:

Method of distribution refers to the means by which the state will distribute funds expected to be received by the five formula grant programs, CDBG, HOME, HTF, ESG and HOPWA, each year. For CDBG-MIT, RHP and HOME ARP, please see the separate Plans for these programs.

Each program distributes funds to local governments, nonprofit organizations and other entities to carry out the activities identified in the Consolidated Plan, in accordance with applicable program requirements. Funds are made available as described below, for priority activities identified in the Strategic Plan that will directly impact priority needs and help accomplish goals and objectives described in this Annual Plan. Program regulations also allow for a specified amount, typically a percentage of the total allocation, to be set aside for state or local recipient administration and other eligible activities, such as ESG HMIS administration, that do not directly contribute to accomplishments that will be reported in the performance report, but rather facilitate program delivery and accomplishment of goals. Compliance with applicable program caps and regulations is also addressed in the sections below.

- CDBG, HOME, and HTF have established programs for 2025 designed to address the three priority needs, Decent Housing, Suitable Living Environment and Economic Opportunity, and related objectives identified in this Annual Plan. Programs and funding levels are provided under the Federal Resources section of this plan. Strategies, or specific activities and project types that potential funding recipients may propose, are described in each program's Method of Distribution and annual plan, along with scoring criteria applicable to the competitive programs and any other criteria used to select projects for funding. Both HOME and HTF funding will be available for new construction and rehab of existing affordable rental housing units under the Authority's Small Rental Development Program (SRDP).
- ESG makes funds available through one competitive funding round each year and will do so again this year to distribute the 2024 allocation. Eligible nonprofits in the state may operate homeless shelters, transitional housing, homeless services programs, street outreach programs, or homeless prevention and re-housing programs and may request funds for any eligible activity defined in the program annual plan. These activities correspond to priority activities identified in this Annual Plan, and to the requirements and regulations governing the Emergency Solutions Program. Funding decisions are based on prior performance, applicant capacity, financial capacity, the proposed project, and other factors, as described in the ESG Method of Distribution and program documents that can be downloaded from the program's website.
- ESG RUSH funds will be allocated by OEO to subrecipients in each county designated within the President's major disaster declaration area DR-4829-SC, dated September 29, 2022 as amended. OEO will accept applications exclusively from current OEO ESG sub recipients that serve the following declared disaster areas: Abbeville, Aiken, Allendale, Anderson, Bamberg, Barnwell, Beaufort, Cherokee, Chester, Edgefield, Fairfield, Greenwood, Greenville, Hampton, Jasper, Kershaw, Laurens, Lexington, McCormick, Newberry, Oconee, Orangeburg, Pickens, Richland, Saluda, Spartanburg, Union, and York counties. The ESG RUSH subrecipients will be chosen based

## **AP-30 Methods of Distribution**

on the agency's self-reported need as it relates to Hurricane Helene. This will not be a competitive selection given the funding amount and selection pool. Should there be more request than funding, then awards will be reduced at OEO's discretion based on need and past performance. The potential subrecipients will have to be currently demonstrating a high performance of their current ESG award. Following this review, OEO will enter into a grant agreement with each sub recipient to ensure adherence to the financial and program requirements.

- SC DPH allocates HOPWA funding for TBRA, Facility Based Supportive Housing, STRMU, PHP, Short-term Temporary Facility Based Housing (hotel, motel, transitional housing), and Supportive Services. Each of these are successful in preventing homelessness of persons with HIV, as described in the program's annual plan.

Activities to be undertaken by recipients of funds are subject to the specific applications received and program funding awards. For more detailed information on the types of eligible activities, as well as the method of distribution for each program, refer to the program documents on each Program's website.

CDBG-MIT, RHP and HOME ARP methods of distribution are not included in this Plan. Please see the appropriate individual and separate plans for these programs.

## AP-30 Methods of Distribution

Table 4 - Distribution Methods by State Program- CDBG

### State Program Name: Community Development Block Grant

<b>State Program Name:</b>	<b>Community Development Block Grant Program</b>
<b>Funding Sources:</b>	CDBG
<b>Describe the state program addressed by the Method of Distribution.</b>	<p>The South Carolina Community Development Block Grant (CDBG) Program is designed to provide assistance to units of general local government in improving economic opportunities and meeting community revitalization needs, particularly for persons of low and moderate income. The CDBG program has been funded through the State since 1982 by the U.S. Department of Housing and Urban Development (HUD) under the Housing and Community Development Act of 1974, as amended (Title I).</p> <p>The CDBG program is governed by Title I of the Housing and Community Development Act of 1974, as amended, and its implementing regulations for the State Program at 24 CFR Part 570, Subpart I. All CDBG activities must be carried out in accordance with the requirements of Title I, Subpart I, the State Consolidated Plan and this Program Description.</p> <p>The SC Department of Commerce, Division of Business Incentives and Community Development, administers the annual allocation from HUD and the State CDBG program.</p>
<b>Describe all of the criteria that will be used to select applications and the relative importance of these criteria.</b>	<p>For most Community Development Programs, the State scores applications against other applications submitted for the same program, using the following criteria: level of community distress, severity of the problem to be addressed using grant funds awarded, citizen participation, level of effort or return on CDBG investment, feasibility of the project, readiness of the project to proceed if funds are awarded, CDBG cost/benefit ratio, number and LMI percentage of project beneficiaries, project outcomes to be achieved and impact, sustainability of the project, degree to which the project reflects state priorities, and capacity of the potential recipient to administer a CDBG project. Some criteria are scored independently based on scoring criteria outlined in the CDBG Program Description, and others are ranked and scored accordingly in logical increments.</p> <p>The Selection Criteria are rated and assigned a score from 1 to 3 where 3 = the best response, 2 = average, and 1 = less than satisfactory. Zero points may be awarded to a criterion if minimum program requirements are not addressed. The ranked scores are calculated and also assigned 1 to 3 points, where 3 is the best. The point assignment is multiplied by the weight of each criterion to obtain a score. There is a maximum score of 300 points.</p> <p>Bonus points are added to the total score, where appropriate. For 2025, projects located in an Opportunity Zone will receive 10 bonus points.</p>

**AP-30 Methods of Distribution**

Table 4 - Distribution Methods by State Program- CDBG

**State Program Name: Community Development Block Grant**

<p><b>State Program Name:</b></p>	<p><b>Community Development Block Grant Program</b></p>
	<p>The State may utilize the expertise of other appropriate State agencies in making a determination regarding the above factors, and the State may request additional information from the applicant or other sources as necessary to evaluate the application and proposed project. The State reserves the right to negotiate or require changes in activities or funding in order to achieve program objectives. For water and sewer projects, the State may require that rates be adjusted to appropriate levels to ensure adequate funding for operation and maintenance or to facilitate borrowing a portion of project costs if such rate increases are reasonable and appropriate.</p> <p>In the event of a tie where there are more applications under consideration for funding than there are funds available, preference will be given first to those applications addressing the highest state priorities and second, to those with the highest Outcome score. If there continues to be a tie the one that benefits the most LMI persons will be funded. The highest scoring projects determined to be fundable will be recommended to the Secretary of the SC Department of Commerce, or his designee, for funding based on the amount of funds available. Projects generally should score at least 175 points to be considered for funding but such projects are not guaranteed funding. The Secretary, or his designee, will make final funding determinations based on a review of the projects utilizing the selection criteria and that best meet Department objectives.</p> <p>The State may make commitments for funding from future rounds, or any additional allocations, reallocations, recaptured or remaining funds, to projects from this program year which are determined by the Secretary, or his designee, to meet Department objectives. The State may also make a commitment to a project and/or partially fund a project (i.e., for ERR, acquisition, engineering) that scores sufficiently but is not ready due to design, environmental or funding issues. Funding may come from this program year, reallocated or recaptured funds, or be contingent on future years' funding.</p> <p><u>Community Development Ready to Go Program</u></p> <p>For the Ready to Go Program, all required project activities leading up to bidding must be complete prior to submission of an application including but not limited to: project design, environmental review, acquisition and permits. Applications are considered for award once all application documentation has been received, and projects are reviewed using the non-comparative scoring factors listed above for the competitive Community Development Programs. The project must obtain a minimum score of 150 points to be considered eligible for funding. In the event there are more eligible applications submitted during the same time than funds available, the highest scoring eligible projects will be funded.</p>

## AP-30 Methods of Distribution

Table 4 - Distribution Methods by State Program- CDBG

### State Program Name: Community Development Block Grant

<b>State Program Name:</b>	<b>Community Development Block Grant Program</b>
	<p><u>Business Development Program</u></p> <p>Applications for Business Development grants may be requested at any time, and the State may issue commitments at any time for project funding contingent upon receipt of an acceptable written commitment from the business (if job creation or retention is involved), acceptable application information, compliance with CDBG program guidelines and HUD regulations, and availability of program funding. Applications are considered for award once all application documentation has been received and are reviewed for completeness and compliance with Program requirements and applicable HUD regulations. The following factors are also considered in making a funding decision: Market conditions or need for the project, economic impact, leveraging, and viability and level of public risk.</p>
<b>If only summary criteria were described, how can potential applicants access application manuals or other state publications describing the application criteria? (CDBG Only)</b>	<p>Each year, the State updates its annual plan or CDBG Program Description and applicant guidance documents and posts them on the <a href="https://www.cdbgSC.com">https://www.cdbgSC.com</a> website. These include the CDBG Program Description, CDBG Application Guidelines and CDBG Implementation Manual, as well as other information helpful to potential applicants. Application request forms can also be found on the website.</p> <p>Note that both the CDBG Program Description and Application Guidelines define and describe all scoring criteria and provide a more in-depth discussion of application requirements and how each type of CDBG application will be reviewed.</p>
<b>Describe how resources will be allocated among funding categories.</b>	<p>The State’s 2025 allocation is estimated to be \$19,809,810 and plans the following distribution:</p> <ul style="list-style-type: none"> <li>• Spring Funding Round: <ul style="list-style-type: none"> <li>• Community Infrastructure - \$9,000,000 (note that funds remaining after the Spring funding round will become available for the Fall funding round)</li> </ul> </li> <li>• Fall Funding Round: <ul style="list-style-type: none"> <li>• Community Enrichment - \$7,115,516</li> <li>• Local Priorities - \$1,000,000</li> <li>• Ready to Go - \$500,000</li> <li>• Business Development - \$1,000,000</li> <li>• Regional Planning - \$500,000</li> <li>• State Administration - \$496,196*</li> </ul> </li> </ul>

## AP-30 Methods of Distribution

Table 4 - Distribution Methods by State Program- CDBG

### State Program Name: Community Development Block Grant

<b>State Program Name:</b>	<b>Community Development Block Grant Program</b>
	<ul style="list-style-type: none"> <li>• State Technical Assistance - \$198,098*</li> </ul> <p>Note that for AP-20 Goals funding and AP-25 Allocation Priorities percentage calculations, Local Priorities has been included with Community Enrichment for the Community Sustainability goal, and Ready to Go has been included with Community Infrastructure in the Public Infrastructure &amp; Facilities goal.</p> <p>* The amount for State Administration is equal to the allowable amount, or 2% of the annual allocation plus \$100,000, and all but the additional \$100,000 will be matched by state funds. The amount for Technical Assistance is also equal to the allowable amount, or 1% of the annual allocation.</p> <p>** The decrease in funds will be applied to the Community Enrichment category.</p>
<b>Describe threshold factors and grant size limits.</b>	<p><b><u>Grant Maximums:</u></b></p> <p>CDBG grant maximums and minimums have been established for each Program:</p> <ul style="list-style-type: none"> <li>• Community Infrastructure - \$1,000,000* maximum, \$50,000 minimum</li> <li>• Community Enrichment - \$750,000* maximum, \$50,000 minimum</li> <li>• Local Priorities - \$1,000,000** maximum, \$50,000 minimum</li> <li>• Ready to Go - \$500,000 maximum*, \$50,000 minimum</li> <li>• Economic Development - \$10,000 per job maximum and \$50,000 minimum</li> <li>• Regional Planning - \$50,000 maximum</li> </ul> <p>* Waivers of the grant maximum for the Community Infrastructure, Community Enrichment and Ready to Go Programs will be considered in certain circumstances described in the CDBG Program Description. A written request explaining the rationale for a waiver of the grant maximum must be submitted for consideration along with the application.</p> <p>** Due to federal caps on public services/equipment, the number and amount of grants for public services activities eligible under the Program may be limited.</p> <p>The grant award limits for all categories may be waived at the discretion of the State in order to provide the level of assistance required where other resources are not reasonably available to the unit of local government to address the need in a timely manner or where the State determines the amount is necessary and appropriate to achieve the State CDBG Program’s objectives.</p> <p><b><u>Threshold</u></b></p>

## AP-30 Methods of Distribution

Table 4 - Distribution Methods by State Program- CDBG

### State Program Name: Community Development Block Grant

<b>State Program Name:</b>	<b>Community Development Block Grant Program</b>
	<p>As a performance-based incentive, a unit of local government can apply for an additional Community Development grant if it has no more than two open CDBG grants (excluding Business Development or Regional Planning grants). However, the open grants must not have exceeded a 30 - month grant period.</p> <p>Additionally, a grantee may only have one open streetscape project.</p> <p>For threshold purposes, a grant is considered open if it is not programmatically closed at the time of application submission. The applicant must submit a request for waiver prior to or with the application request. At the discretion of the State, a performance threshold waiver may be considered only for the following reasons:</p> <ul style="list-style-type: none"> <li>• There is an urgent or compelling need for immediate assistance, such as an imminent health threat to the public, or</li> <li>• It is determined that lack of performance on an open grant is due to unavoidable circumstances or conditions beyond the control of the local government. If problems are determined to be administrative, the local government may be allowed to apply if a different grant administrator is responsible for the new application/project.</li> </ul> <p>A unit of local government may not apply for Community Development funds if it has any open grant which has not been programmatically closed due to the local government's lack of compliance with significant programmatic or financial requirements of the program. A grant may not be awarded to a local government which has a serious, outstanding audit or monitoring finding involving the potential for significant monetary restitution or non-responsiveness on any previously funded CDBG grant.</p>
<b>What are the outcome measures expected as a result of the method of distribution?</b>	All projects are required to propose a level of benefit and performance outcomes they expect the project will achieve as a result of the use of CDBG funds. Projects are evaluated on this basis, along with all other scoring criteria, and projects must demonstrate that they have achieved performance goals once all project funds have been expended, as part of the grant closeout process. Accomplishments are reported annually in the State's Consolidated Performance and Evaluation Report, or CAPER.

## **AP-30 Methods of Distribution**

Table 4 - Distribution Methods by State Program- CDBG

### **State Program Name: Community Development Block Grant**

**Questions not applicable to CDBG, and thus without responses in the CDBG Method of Distribution section:**

Describe the process for awarding funds to state recipients and how the state will make its allocation available to units of general local government, and non-profit organizations, including community and faith-based organizations. (ESG only)

Identify the method of selecting project sponsors (including providing full access to grassroots faith-based and other community-based organizations). (HOPWA only)



## AP-30 Methods of Distribution

Table 4 - Distribution Methods by State Program- HOME

<b>State Program Name:</b>	<b>HOME Investment Partnerships Program</b>
<b>Funding Sources:</b>	HOME
<b>Describe the state program addressed by the Method of Distribution.</b>	HOME funding will be made available through a competitive process by which the highest scoring applications submitted during an annual funding cycle will be awarded. South Carolina will not distribute HOME Investment Partnerships Program funds through subgrantees.
<b>Describe all of the criteria that will be used to select applications and the relative importance of these criteria.  (continued)</b>	<p>Points will be awarded as outlined in the HOME Attachments. Both positive and negative points may be assessed for things such as performance issues, site characteristics, local affordable housing market conditions, project characteristics such as energy efficiency, sustainable building practices and planned mixed income units, leveraging, and local community factors such as revitalization and other pertinent local plans.</p> <p>In total, new construction projects are eligible to receive a total of 131 points.</p> <p><b><u>Evaluation of Rehabilitation Applications</u></b></p> <p>The Authority will also evaluate rehabilitation applications comparatively based on the criteria outlined in the HOME Attachments including elements such as prevention of conversion of affordable units to market rate/loss of government housing resources, extent of physical distress, local revitalization planning and contribution to economic empowerment of low income households.</p> <p>Applications proposing rehabilitation will be scored out of a total of 115 possible points, to be allocated as described in the HOME Attachments.</p>
<b>Describe how resources will be allocated among funding categories.</b>	<p>For 2025, the Authority received \$4,788,178.50 in HOME HUD funding, plus \$27,817,548.15 in accrued program income. The total of \$32,605,726.65 will be allocated into funding categories as shown below. But note that any increase or decrease will be reflected in funding available for rental activities in the Small Rental Development Program.</p> <ul style="list-style-type: none"> <li>• Allowable set aside of ten percent (10%) for the administration of the program. Administrative funds of \$478,817.85 will be used for the planning, administration, allocation of indirect costs and monitoring of the program. Funds will also be used to conduct workshops to assist participants in applying for and implementing HOME funded projects.</li> <li>• The required CHDO set-aside allocation is fifteen percent (15%) which is \$718,226.77 of the Authority’s total HOME allocation. CHDOs wanting to request funding must apply in the 2025 Small Rental Development Program funding cycle. The CHDO set-aside amount is included in the total amount set-aside for the rental competition.</li> <li>• All remaining HOME funds, including any rehabilitation not awarded, will be used for rental activities. **</li> </ul>

## AP-30 Methods of Distribution

Table 4 - Distribution Methods by State Program- HOME

<b>State Program Name:</b>	<b>HOME Investment Partnerships Program</b>
	** Note that any increase or decrease will be reflected in funding available for rental activities in the Small Rental Development Program.
<b>Describe threshold factors and grant size limits.</b>	<p><b>Projects that do not meet threshold requirements will be excluded from further review.</b> Threshold requirements are described fully in the HOME Attachments but include financial capacity, good standing with all Authority and SC Housing Corporation administered programs, experience and capacity to develop an eligible SRDP project, site control and environmental review, participation and performance of previous funding recipients and having met required deadlines, proper zoning, compliance with the Uniform Relocation Act, and compliance with requirements to physical needs assessment, lead-based paint, asbestos, and safe drinking water.</p> <p>Applicants that are related entities, principals, and/or individuals and are applying for funds are only eligible to apply for two (2) SRDP awards and may only be allocated one (1) SRDP award. More details can be found in the HOME Attachments.</p>
<b>What are the outcome measures expected as a result of the method of distribution?</b>	<p>All projects are subject to HOME/HTF/SC HTF compliance monitoring requirements. At a minimum, the owners of projects are responsible for conducting the following annually:</p> <ul style="list-style-type: none"> <li>• Maximum rent and utility allowances must be reviewed and recalculated annually upon the anniversary of the lease renewal date. Updated HOME/HTF rents are published annually by HUD and are provided on the Authority’s website. Updated SC HTF rent allowances are updated annually by SC Housing.</li> <li>• The HOME Final Rule and the HTF Interim Rule requires approval of all rents on an annual basis for developments with such units. The approval process will be handled by the Compliance Monitoring Department. Annual Rent Approval Form M-66 will be submitted to Compliance Monitoring staff to begin the approval process.</li> <li>• HUD Utility Schedule Model. All utility allowance calculations on the Excel Spreadsheets as part of the HUD Utility Schedule Model must be provided. The Authority reserves the right to review all backup data used for calculations. HUD link: <a href="http://www.huduser.org/portal/resources/utlmodel.html">http://www.huduser.org/portal/resources/utlmodel.html</a>.</li> <li>• The annual income for all tenants must be reviewed and verified each year. Updated HOME/HTF incomes are published annually by HUD and are provided on the Authority’s website. Updated SC HTF income limits are updated annually by SC Housing and also provided on the website. The annual income definition found at 24 CFR Part 5: income is the gross amount of income of all adult household members that is anticipated to be received during the coming 12 month period.</li> </ul>

## AP-30 Methods of Distribution

Table 4 - Distribution Methods by State Program- HOME

<b>State Program Name:</b>	<b>HOME Investment Partnerships Program</b>
	<ul style="list-style-type: none"> <li>• On-site inspections for compliance with the National Standards for the Physical Inspection of Real Estate (NSPIRE) should be conducted by the owners:             <ul style="list-style-type: none"> <li>○ The Authority conducts periodic on-site compliance reviews throughout the affordability period to ensure compliance with HOME/HTF/SC HTF rental program requirements. These reviews include, but are not limited to, occupancy requirements and property standards. Refer to the SRDP Compliance Manual located on the Authority’s website for further compliance monitoring requirements.</li> <li>○ Rental projects with 10 or more HOME units will be required to submit financial statements annually to determine the financial health of the project.</li> <li>○ A draft of the 2025 SRDP Application Manual is provided as an attachment to this Action Plan.</li> </ul> </li> </ul>

**Questions not applicable to HOME, and thus without responses in the HOME Method of Distribution section:**

If only summary criteria were described, how can potential applicants access application manuals or other state publications describing the application criteria? (CDBG only)

Describe the process for awarding funds to state recipients and how the state will make its allocation available to units of general local government, and non-profit organizations, including community and faith-based organizations. (ESG only)

Identify the method of selecting project sponsors (including providing full access to grassroots faith-based and other community-based organizations). (HOPWA only)

## AP-30 Methods of Distribution

Table 4 - Distribution Methods by State Program- HTF

<b>State Program Name:</b>	<b>Housing Trust Fund</b>
<b>Funding Sources:</b>	Housing Trust Fund
<b>Describe the state program addressed by the Method of Distribution.</b>	A portion of SC Housing’s HTF funding will be made available through a competitive process by which the highest scoring applications submitted during an annual funding cycle will be awarded. South Carolina will not distribute Housing Trust Funds through subgrantees.
<b>Describe all of the criteria that will be used to select applications and the relative importance of these criteria.</b>	<p>Points will be awarded as outlined in the HOME &amp; HTF Attachments. Both positive and negative points may be assessed for things such as performance issues, site characteristics, local affordable housing market conditions, project characteristics such as energy efficiency, sustainable building practices and planned mixed income units, leveraging, and local community factors such as revitalization and other pertinent local plans.</p> <p>In total, new construction projects are eligible to receive a total of 131 points.</p> <p><b><u>Evaluation of Rehabilitation Applications</u></b></p> <p>The Authority will also evaluate rehabilitation applications comparatively based on the criteria outlined in the HOME &amp; HTF Attachments including elements such as prevention of conversion of affordable units to market rate/loss of government housing resources, extent of physical distress, local revitalization planning and contribution to economic empowerment of low income households.</p> <p>Applications proposing rehabilitation will be scored out of a total of one hundred (100) possible points, to be allocated as described in the HOME &amp; HTF Attachments.</p> <p>Points will be awarded as outlined in this section. Both positive and negative points may be assessed.</p>
<b>Describe how resources will be allocated among funding categories.</b>	<p>The Authority estimates a 2025 allocation of \$2,830,350.03 for distribution plus \$1,668,180.84 carried forward from 2024. HTF funding will be used as outlined below:</p> <ul style="list-style-type: none"> <li>• Allowable set aside of ten percent (10%) for the administration of the program, or \$283,035.00. Administrative funds will be used for the planning, administration, allocation of indirect costs and monitoring of the program. Funds will also be used to conduct workshops to assist participants in applying for and implementing HTF funded projects.</li> <li>• The balance of \$2,547,315.03 will be set aside for the 2025 Small Rental Development Program to fund affordable rental housing developments.</li> </ul>

## AP-30 Methods of Distribution

Table 4 - Distribution Methods by State Program- HTF

<b>State Program Name:</b>	<b>Housing Trust Fund</b>
<b>Describe threshold factors and grant size limits.</b>	<p><b>Applications that do not meet threshold requirements will be excluded from further review.</b> Threshold requirements are described fully in the HTF Attachments but include financial capacity, good standing with all Authority and SC Housing Corporation administered programs, experience and capacity to develop an eligible SRDP project, site control and environmental review, participation and performance of previous funding recipients and having met required deadlines, proper zoning, compliance with the Uniform Relocation Act, and compliance with requirements to physical needs assessment, lead-based paint, asbestos, and safe drinking water.</p> <p>Applicants that are related entities, principals, and/or individuals and are applying for funds are only eligible to apply for two (2) SRDP awards and may only be allocated one (1) SRDP award. More details can be found in the HOME Attachments.</p>
<b>What are the outcome measures expected as a result of the method of distribution?</b>	<p>All projects are subject to HOME/HTF/SC HTF compliance monitoring requirements. At a minimum, the owners of projects are responsible for conducting the following annually:</p> <ul style="list-style-type: none"> <li>• Maximum rent and utility allowances must be reviewed and recalculated annually upon the anniversary of the lease renewal date. Updated HOME/HTF rents are published annually by HUD and are provided on the Authority’s website. Updated SC HTF rent allowances are updated annually by SC Housing.</li> <li>• The HOME Final Rule and the HTF Interim Rule requires approval of all rents on an annual basis for developments with such units. The approval process will be handled by the Compliance Monitoring Department. Annual Rent Approval Form M-66 will be submitted to Compliance Monitoring staff to begin the approval process.</li> <li>• HUD Utility Schedule Model. All utility allowance calculations on the Excel Spreadsheets as part of the HUD Utility Schedule Model must be provided. The Authority reserves the right to review all backup data used for calculations. HUD link: <a href="http://www.huduser.org/portal/resources/utimodel.html">http://www.huduser.org/portal/resources/utimodel.html</a>.</li> <li>• The annual income for all tenants must be reviewed and verified each year. Updated HOME/HTF incomes are published annually by HUD and are provided on the Authority’s website. Updated SC HTF income limits are updated annually by SC Housing. and also provided on the website. The annual income definition found at 24 CFR Part 5: income is the gross amount of income of all adult household members that is anticipated to be received during the coming 12 month period.</li> <li>• On-site inspections for compliance with the National Standards for the Physical Inspection of Real Estate (NSPIRE) should be conducted by the owners:</li> </ul>

## AP-30 Methods of Distribution

Table 4 - Distribution Methods by State Program- HTF

State Program Name:	Housing Trust Fund
	<ul style="list-style-type: none"> <li>○ The Authority conducts periodic on-site compliance reviews throughout the affordability period to ensure compliance with HOME/HTF/SC HTF rental program requirements. These reviews include, but are not limited to, occupancy requirements and property standards. Refer to the SRDP Compliance Manual located on the Authority’s website for further compliance monitoring requirements.</li> <li>○ Rental projects with 10 or more HTF units will be required to submit financial statements annually to determine the financial health of the project.</li> <li>○ A draft of the 2025 SRDP Application Manual is provided as an attachment to this Action Plan.</li> </ul>

**Questions not applicable to HTF, and thus without responses in the HTF Method of Distribution section:**

If only summary criteria were described, how can potential applicants access application manuals or other state publications describing the application criteria? (CDBG only)

Describe the process for awarding funds to state recipients and how the state will make its allocation available to units of general local government, and non-profit organizations, including community and faith-based organizations. (ESG only)

Identify the method of selecting project sponsors (including providing full access to grassroots faith-based and other community-based organizations). (HOPWA only)

## AP-30 Methods of Distribution

Table 4 - Distribution Methods by State Program- ESG

<b>State Program Name:</b>	<b>Emergency Solutions Grant Program</b>
<b>Funding Sources:</b>	ESG
<b>Describe the state program addressed by the Method of Distribution.</b>	The Emergency Solutions Grant program provides funding to: engage homeless individuals and families living on the street, improve the number and quality of emergency shelters for homeless individuals and families and provide funding to help operate these shelters, provide essential services to shelter residents and outreach to unsheltered homeless, rapidly rehouse homeless individuals and families, and prevent families/individuals from becoming homeless.
<b>Describe all of the criteria that will be used to select applications and the relative importance of these criteria.</b>	<p>The Emergency Solutions Grant Program can award a total of 230 total points to applicants, for a variety of criteria including prior performance, applicant capacity, financial capacity, the proposed project, and other factors. Points will be awarded as follows:</p> <ul style="list-style-type: none"> <li>• Up to 80 points based on the applicant’s prior year performance</li> <li>• Up to 40 points based on applicant capacity</li> <li>• Up to 60 points based on financial capacity</li> <li>• Up to 40 points for the proposed project</li> <li>• Up to 10 points for other factors*</li> </ul> <p>* Other factors are unique to each project</p>
<b>Describe the process for awarding funds to state recipients and how the state will make its allocation available to units of general local government, and non-profit organizations, including community and faith-based organizations. (ESG only)</b>	<p>Although states can award ESG Program funding to various recipients types, including non-profits and local governments. the South Carolina ESG Program has opted to award funding only to non-profit organizations. All 501(c)3 non-profits registered in the state of South Carolina are eligible to apply.</p> <p>ESG holds an annual Request for Application Workshop to discuss the new year’s funding opportunities. Past recipients are invited to attend, along with new organizations that have expressed interest in the program throughout the year. The purpose of the Workshop is to introduce potential applications to the ESG Program, explain the basic rules and requirements of the Program, and provide information on how to apply and the deadline for doing so. After applications are received in April, a panel of Program staff review all applications received and score them on a scale of 0 to 230. Since 2018, applications are also ranked against applications received from other organizations within the local Continuum of Care region, and then funding decisions are made by the Program Management (currently the Director of the Office of Economic Opportunity, which administers the ESG Program).</p>

## AP-30 Methods of Distribution

Table 4 - Distribution Methods by State Program- ESG

<b>State Program Name:</b>	<b>Emergency Solutions Grant Program</b>
<b>Describe how resources will be allocated among funding categories.</b>	<p>ESG received a 2024 allocation of \$2,493,328. No supplemental funding is expected from additional sources, such as Continuum 501. The Emergency Solutions Grant Program plans to distribute the funds as follows: Administration - 7.5%; Emergency Shelter and Street Outreach - 55%(cannot exceed 60%); Homeless Prevention, Rapid Re-housing 24.4%; and HMIs 13.1%. Using these percentages, 2024 funding will be distributed this way:</p> <ul style="list-style-type: none"> <li>• Shelter, Services &amp; Outreach – 55% or \$1,371,330 (cannot exceed 60%)</li> <li>• Homeless Prevention and Rapid Re-housing – 27.5% or \$684,498 (\$308,549)</li> <li>• HMIS – 10% or \$250,500</li> <li>• State Program Admin (7.5% of the total allocation) - \$187,000</li> </ul>
<b>Describe threshold factors and grant size limits.</b>	<p>There are no threshold factors for the Emergency Solutions Grant Program.</p> <p>The maximum award amount is \$350,000, but in recent years, funding limitations have prevented the Program from issuing maximum awards. Instead, ESG strives to fund as many recipients as possible and to distribute funding throughout the state.</p>
<b>What are the outcome measures expected as a result of the method of distribution?</b>	<p>Applicants for ESG funds identify measures of success and expected outcomes in their application. These must help achieve one or more ESG objectives, including street outreach to unsheltered homeless individuals and families, providing emergency shelter or essential services for individuals and families who have become homeless, rapidly rehousing individuals and families to shorten their episode of homelessness, and preventing homelessness for families and individuals at risk of becoming homeless.</p> <p>Actual proposed outcomes are refined after awards are announced, to reflect funds that will actually be available as a result of the amount awarded.</p>



## AP-30 Methods of Distribution

Table 4 - Distribution Methods by State Program- ESG

<b>State Program Name:</b>	<b>Emergency Solutions Grant Program Rapid Unsheltered Survivor Housing</b>																
<b>Describe how resources will be allocated among funding categories.</b>	<p>The plan to distribute ESG RUSH funds is as follows:            3% in State Program Administration            60% shared between Emergency Shelter and Street Outreach            37% shared between Rapid Re-Housing, Homeless Prevention, and HMIS            Actual amounts may differ once all applications are received, but Emergency Shelter and Street Outreach combined cannot exceed 60%.</p> <table border="1" style="width: 100%; border-collapse: collapse; margin-top: 10px;"> <thead> <tr> <th style="text-align: left;">Proposed Activity</th> <th style="text-align: right;">Proposed Funding Amount</th> </tr> </thead> <tbody> <tr> <td>Emergency Shelter</td> <td style="text-align: right;">\$1,597,160.16</td> </tr> <tr> <td>Street Outreach</td> <td style="text-align: right;">\$177,462.22</td> </tr> <tr> <td>Rapid Re-housing</td> <td style="text-align: right;">\$515,719.00</td> </tr> <tr> <td>Homeless Prevention</td> <td style="text-align: right;">\$515,719.00</td> </tr> <tr> <td>HMIS</td> <td style="text-align: right;">\$62,912.50</td> </tr> <tr> <td>State Program Administration</td> <td style="text-align: right;">\$88,731.12</td> </tr> <tr> <td><b>Total ESG RUSH</b></td> <td style="text-align: right;"><b>\$2,957,704.00</b></td> </tr> </tbody> </table>	Proposed Activity	Proposed Funding Amount	Emergency Shelter	\$1,597,160.16	Street Outreach	\$177,462.22	Rapid Re-housing	\$515,719.00	Homeless Prevention	\$515,719.00	HMIS	\$62,912.50	State Program Administration	\$88,731.12	<b>Total ESG RUSH</b>	<b>\$2,957,704.00</b>
Proposed Activity	Proposed Funding Amount																
Emergency Shelter	\$1,597,160.16																
Street Outreach	\$177,462.22																
Rapid Re-housing	\$515,719.00																
Homeless Prevention	\$515,719.00																
HMIS	\$62,912.50																
State Program Administration	\$88,731.12																
<b>Total ESG RUSH</b>	<b>\$2,957,704.00</b>																
<b>Describe threshold factors and grant size limits.</b>	While applicants for the OEO ESG RUSH funds may request funds for multiple service components, each service component proposed in an application is individually considered for an award of funds. OEO strives to fund as many sub recipients as possible and to distribute funding that can serve the DR-1829-SC identified counties.																
<b>What are the outcome measures expected as a result of the method of distribution?</b>	The same outcome measures for the regular Emergency Solutions Grant Program will be used for the ESG RUSH funds. Provide Street Outreach to unsheltered homeless individuals and families, provide Emergency Shelter and/or essential services for individuals and families who have become homeless, provide Rapid Re-Housing to individuals and families to shorten their episode of homelessness, and provide Homeless Prevention to individuals and families at risk of becoming homeless.																

**Questions not applicable to ESG, and thus without responses in the ESG Method of Distribution section:**

If only summary criteria were described, how can potential applicants access application manuals or other state publications describing the application criteria? (CDBG only)

Identify the method of selecting project sponsors (including providing full access to grassroots faith-based and other community-based organizations). (HOPWA only)

## AP-30 Methods of Distribution

Table 4 - Distribution Methods by State Program- HOPWA

<b>State Program Name:</b>	<b>Housing Opportunities for Persons with HIV/AIDS (HOPWA)</b>
<b>Funding Sources:</b>	HOPWA
<b>Describe the state program addressed by the Method of Distribution.</b>	Dependent on availability of funding, the SC Department of Public Health ( SC DPH) allocates HOPWA funds to TBRA and Supportive Housing Facility operating costs necessary to continue current operations. Remaining funds are allocated through a formula based on prevalence by county and allocated to Project Sponsors providing STRMU, PHP, and Supportive Services. The allocation for each of these services is determined by the Project Sponsor annually based on local needs. Funding increased, TBRA, STRMU, PHP, and Supportive Services are eligible for a proportional increase.
<b>Describe all of the criteria that will be used to select applications and the relative importance of these criteria.</b>	<p>Project Sponsors are awarded through a competitive Request for Grant Application (RFGA) process. All HOPWA RFGAs are scored on the following criteria: Program Description, Organization History, Experience, and Qualifications, Community Assessment, and Reports and Evaluation. Within the application process, applicants must describe how they will serve all counties in their service area with STRMU, PHP, Supportive Services, Transitional Housing and referral to TBRA. All counties in the service area must be covered, ensuring that clients in every county of the state’s jurisdiction have access to HOPWA funds.</p> <p>RFGAs are also used to award the TBRA and Facility Based Housing contracts. The TBRA provider must provide TBRA to all counties within SC DPH’s HOPWA jurisdiction. The Facility Based Supportive Housing provider must be available to taking clients statewide.</p>
<b>Identify the method of selecting project sponsors (including providing full access to grassroots faith-based and other community-based organizations). (HOPWA only)</b>	<p>SC DPH distributes HOPWA funds to Project Sponsors, which are typically regional Ryan White Part B Service Providers, eligible non-profit organizations and/or local health departments that assist persons with HIV/AIDS. Grass-roots faith based organizations and other community-based organizations are eligible to apply.</p> <p>Project Sponsors for STRMU, PHP, Supportive Services, Transitional Housing and referral to TBRA are awarded through a competitive Request for Grant Application (RFGA) process. The RFGA process is also used to award the statewide TBRA and Facility Based Housing contracts.</p> <p>All RFGAs are advertised on the SC DPH website and in the South Carolina Business Opportunities (SCBO) newsletter in the fall, preceding the March 31st end of the contract period. All providers known by SC DPH to be serving people living with HIV/AIDS are contacted regarding the release of the RFGA.</p> <p>HOPWA RFGA Award Notification is posted on the SC DPH website. Emails with the link to the Award Notification are sent to all applicants. After the dispute period, grant</p>

## AP-30 Methods of Distribution

Table 4 - Distribution Methods by State Program- HOPWA

	<p>agreements are made with the awarded entity. These contracts typically run for 3 years.</p>
<p><b>Describe how resources will be allocated among funding categories.</b></p>	<p>SC DPH allocates funding for TBRA based on current utilization of the program and availability of funding.</p> <p>Operating costs for Facility Based Supportive Housing are established by DHEC based on the reasonable needs of the program and historical costs to operate the facility.</p> <p>Remaining funds are allocated through a formula based on HIV prevalence rates by county, to Project Sponsors that provide STRMU, PHP, Transitional Housing and Supportive Services. The allocation for each of these services is determined by the Project Sponsor annually based on local needs. Estimates are initially provided. Then, once the final funding is known, if funding is reduced, all services are eligible for a proportional decrease. If funding is increased, TBRA, STRMU, PHP, Transitional Housing and Supportive Services are eligible for a proportional increase.</p> <p>For Program Year 2024, HOPWA received \$2,992,153 and SC DPH will allocate funds to the TBRA provider and then to Project Sponsors based on HIV prevalence in the counties served. Project Sponsors will then allocate to activities based on projected local needs. 2024 allocation would be as follows:</p> <ul style="list-style-type: none"> <li>• Operating Costs for Facility Based Housing - \$200,000</li> <li>• TBRA - \$883,500</li> <li>• STRMU - \$704,283</li> <li>• Supportive Services (including Permanent Housing Placement) - \$1,325,711</li> <li>• Short-Term or Facility-Based Housing Services - \$41,428</li> <li>• Sponsor Admin - \$237,467</li> <li>• State Program Admin - \$89,764</li> </ul> <p>* As noted above, previous year funding of \$500,000 is included in the distribution above and Total Expected Funds on AP-15. These funds are allocated to TBRA.</p>
<p><b>Describe threshold factors and grant size limits.</b></p>	<p>The TBRA Project Sponsor maximum annual award is \$875,000.</p> <p>The maximum annual award for Facility Based Supportive Services Operating costs is \$200,000.</p> <p>Project Sponsor awards are dependent upon the HOPWA award amount and range from \$32,753 to \$480,462. The award is based on the prevalence of HIV/AIDS in the Project Sponsor service area.</p>

## AP-30 Methods of Distribution

Table 4 - Distribution Methods by State Program- HOPWA

<p><b>What are the outcome measures expected as a result of the method of distribution?</b></p>	<p>The primary objective of SC DPH’s statewide HOPWA program is to keep People Living with HIV/AIDS (PLWHA) from becoming homeless and promote stable housing. HOPWA enables eligible persons with HIV/AIDS and their families to secure and sustain decent, safe and sanitary housing.</p> <p>HOPWA measures outcomes in terms of the numbers of clients served with TBRA, households provided with permanent housing placement, households provided with supportive services such as case management, employment assistance, transportation, and alcohol and drug abuse services, and the number of households residing in units supported with HOPWA operating funds.</p> <p>Other outcome measures for TBRA and STRMU services are housing stability and temporary stability with reduced risk of homelessness. For supportive services, HOPWA measures the percentage of clients served who receive support for stable housing, as well as the percentage that have access to support, access to health care, and who have a source of income.</p>
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**Questions not applicable to HOPWA, and thus without responses in the HOPWA Method of Distribution section:**

If only summary criteria were described, how can potential applicants access application manuals or other state publications describing the application criteria? (CDBG only)

Describe the process for awarding funds to state recipients and how the state will make its allocation available to units of general local government, and non-profit organizations, including community and faith-based organizations. (ESG only)

**Discussion:**

# AP-38 Project Summary

## AP-35 Projects – (Optional)

### Introduction:

The five Consolidated Plan Programs, CDBG, HOME, HTF, ESG and HOPWA, have each developed a plan for how they will distribute HUD funding for 2025. These plans are described more completely in the program and application documents available for download from each Program's website, as well as in AP- 25 Allocation Priorities and AP-30 Method of Distribution. Because funds are generally distributed through programs of competitive funding, specific projects are not known in advance of completion of the program year, receipt of all applications for funding and completion of all funding decisions.

### ESG RUSH

It is anticipated that 100% of the ESG RUSH funding will be used for eligible services in the areas of administration, emergency shelter, street outreach, rapid re-housing, homeless prevention, and homeless management information system (HMIS), consistent with the award letter for the ESG RUSH allocation. Funds will be used for approved services to address the needs of individuals or families who are homeless or at risk of homelessness within the President’s major disaster declaration area DR-4829-SC, dated September 29, 2024, as amended.

#	Project Name

Table 8 – Project Information

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

Each Program has identified various programs or activities that will be funded during 2025, and that will directly contribute toward achieving the goals defined in this plan. Funding for each of these programs or activities are described in program-specific sections of AP-30, Method of Distribution and the HOME and HTF Attachments to this Plan. But in general, the CDBG, HOME and HTF, and ESG programs for 2025 are designed to address the three priority needs, Decent Housing, Suitable Living Environment, and Economic Opportunity. Allocation priorities are based on expected funding and program evaluation of relative need amongst the related objectives identified in the Plan. For HOPWA, SC DPH allocates funding for TBRA, Facility based Supportive Housing, STMTRU, PHP, Transitional Housing and Supportive Housing, as each of these are successful in preventing homelessness of persons with HIV. The Action Plan for CDBG Mitigation funds announced in 2019 and additional MIT funds awarded in 2021 is available on the SCOR. Website.

Please see AP-25, Allocation Priorities for more details on how the methods of distribution for each Consolidated Plan program will address priority needs.

Regarding obstacles to meeting underserved housing and community development needs, the primary obstacle in South Carolina is funding. Many local governments in this state have very limited local resources, making funding from other sources particularly important, and existing resources continue to shrink. Demand for assistance, on the other hand, is growing as the number of lower income individuals,

### **AP-38 Project Summary**

families, and neighborhoods in need, coupled with the complexity of issues they face, is driving a steady increase in the scale and cost of needed assistance. The combination of these factors places substantial new burdens on an already strained housing and community development delivery system.

Capacity and resource coordination are also significant obstacles. Infrastructure deficiencies are persistent impediments to the State's ability to address long-standing community needs. Insufficient expertise, funding, and planning plague a disproportionate number of South Carolina's rural areas. Capacity limitations as well as inadequate resource coordination are barriers to undertaking crucial quality of life improvements. Consequently, much needed new development or upgrades in housing, infrastructure, and community facilities are not made. Prolonged periods of disinvestment and decline have resulted in some economic and social decline in many communities across the state.

## **AP-40 Section 108 Loan Guarantee**

### **AP-40 Section 108 Loan Guarantee – 91.320(k)(1)(ii)**

**Will the state help non-entitlement units of general local government to apply for Section 108 loan funds?**

No

#### **Available Grant Amounts**

Not applicable.

#### **Acceptance process of applications**

Not applicable.

## **AP-45 Community Revitalization Strategies**

### **AP-45 Community Revitalization Strategies – 91.320(k)(1)(ii)**

**Will the state allow units of general local government to carry out community revitalization strategies?**

No

#### **State's Process and Criteria for approving local government revitalization strategies**

The State does not use Community Development Strategy Areas within its CDBG Program.



## AP-50 Geographic Distribution

### AP-50 Geographic Distribution – 91.320(f)

#### Description of the geographic areas of the state (including areas of low-income and minority concentration) where assistance will be directed

The five HUD programs included in this Consolidated Plan generally do not allocate funding availability by region. Instead, CDBG, HOME, and HTF allocate funding availability by program, with each year’s programs designed to address the various objectives and priority needs described in this plan.

ESG makes funding available through one competition, with no regional targeting of funds but with a goal of distributing funds throughout the state. To that end, ESG’s scoring process ranks applicants against others from the same Continuum of Care region.

HOME and HTF funding will give preference to projects located in areas of the state that have the highest shortage of affordable housing, are located in close proximity to employment opportunities and other amenities and are located in counties that have not been awarded funds within the last 5 years.

HOPWA serves all areas of the state except the three areas that are HOPWA entitlement communities (Columbia, Charleston and Greenville) and the counties that fall in North Carolina and Georgia HOPWA entitlement communities. The amount of HOPWA assistance is based on HIV prevalence rates.

Assistance provided by ESG RUSH funds will be directed to the counties designated within the President’s major disaster declaration area DR-4829-SC, dated September 29, 2022 as amended.

#### Geographic Distribution

Target Area	Percentage of Funds

Table 9 - Geographic Distribution

#### Rationale for the priorities for allocating investments geographically

For non-statewide services, HOPWA funds are allocated to Project Sponsors by county based on HIV/AIDS prevalence rates.

#### Discussion

## AP-55 Affordable Housing

### AP-55 Affordable Housing – 24 CFR 91.320(g)

#### Introduction:

This section provides the State's estimate of the number of households that will receive affordable housing, based on the goals set forth in AP-20, Annual Goals and Objectives. HUD specifies that the number of households estimated in the tables below should not include those expected to benefit from emergency shelter, transitional shelter or social services. Also, the totals by household type (top table) and program or activity type (bottom table) must match. Related AP-20 goals include new affordable rental housing and preservation of existing housing (rehab), and the special needs TBRA goal for people living with HIV/AIDs.

CDBG-DR goals for buyouts (acquisition), single family housing rehabilitation and rental repairs (rehabilitation) and CDBG-MIT goals for acquisition related to public facilities (green space etc. to be used for flood hazard mitigation) and are not included below.

<b>One Year Goals for the Number of Households to be Supported</b>	
Homeless	0
Non-Homeless	87
Special-Needs	<u>126</u>
Total (from total by activity, table below)	213

**Table 10 - One Year Goals for Affordable Housing by Support Requirement**

<b>One Year Goals for the Number of Households Supported Through</b>	
Rental Assistance	126
Production of New Units	75
Rehab of Existing Units	12
Acquisition of Existing Units	<u>0</u>
Total	213

**Table 11 - One Year Goals for Affordable Housing by Support Type**

#### Discussion:

## AP-55 Affordable Housing

Goals shown on AP-20 were used to arrive at the totals above, according to HUD guidance, as follows:

### Table 8 - Household Types to be Supported:

- Homeless - Per HUD, this estimate should be the annual goal for housing assistance for units reserved for homeless individuals and households. None are estimated, as none of the programs specifically reserve housing units for homeless individuals. Further, although ESG and ESG RUSH applicants may request funding for a variety of activities related to homeless shelter, outreach services, preventive services for those at risk of becoming homeless, and rapid re-housing for those who are currently homeless, according to HUD none of these activities should be included in the Table 8 homeless category.
- Non-Homeless - Per HUD, this estimate should be the total goal for all housing units NOT reserved for homeless individuals, and not specifically for special needs households. While HOME and HTF may assist special needs households through its regular rental assistance programs, no 2025 HOME or HTF funds will be aimed specifically at assisting special needs households. This figure is therefore the total of the goals for other housing activities including new rental units and preservation of existing affordable housing.
- Special Needs - This is the goal for assisting households that are not homeless but require specialized housing or supportive service, such as HOPWA TBRA.

### Table 9 - Households Supported through Activities:

- Rental Assistance – This is the HOPWA special needs TBRA goal. (No HOME short-term rental assistance for security deposits goal for 2025).
- New units – The HOME and HTF new rental units goal.
- Rehab of Existing Units – The HOME and HTF goal for preservation of existing affordable housing, and the CDBG-DR goal for single-family rehabilitation and rental repair. (Accomplishments, although there is no specific goal, may include limited rehabilitation of existing affordable housing units in conjunction with CDBG neighborhood revitalization or public infrastructure projects.)
- Acquisition of Existing Units - No homeownership goal is proposed for 2025

## **AP-60 Public Housing**

### **AP-60 Public Housing - 24 CFR 91.320(j)**

#### **Introduction:**

SC Housing serves as the Local Housing Authority in the administration and delivery of rental assistance under HUD's Housing Choice Voucher Program for the following counties: Clarendon, Colleton, Dorchester, Fairfield, Kershaw, Lee and Lexington, Community based Public Housing Authorities (PHAs) located in the states larger suburban and metropolitan areas own and manage public housing developments. SC Housing supports the local PHAs with financing and/or technical assistance and thereby helps the PHAs achieve the federal program objectives of encouraging homeownership, self-sufficiency, and youth development, but the state does not undertake public housing resident management or ownership initiatives.

During the development of the Consolidated Plan, the State reviewed the plans of public housing authorities in South Carolina. These plans indicate a general trend toward concepts of family self-sufficiency, individual development accounts, and homeownership programs.

To the State's knowledge, there are no outstanding court orders, consent decrees, or HUD sanctions that would either prevent or negatively impact the delivery of affordable housing to low income persons and families or impede implementation of the Consolidated Plan.

#### **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:**

## **AP-65 Homeless & Other Special Needs**

### **AP-65 Homeless and Other Special Needs Activities – 91.320(h)**

#### **Introduction**

The Emergency Solutions Grant Program is targeted at homeless activities, as described below. Emergency Solutions Grant Rapid Unsheltered Survivor Housing shares the same targeted homeless activities with the caveat that is designated with the President’s major disaster declaration area DR-4829-SC, dated September 29, 2022 as amended. The HOME American Rescue Plan (ARP) Program is also targeted at homeless and homeless prevention activities.

HOME ARP required a separate Allocation Plan that was approved by HUD in 2023 and amended the 2021 Action Plan. Based on the needs assessment completed for ARP, eligible activities will be development of affordable rental housing only.

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

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

Street Outreach involves identifying places in the community where unsheltered homeless have been typically found, by law enforcement, community service workers or homeless count volunteers. Then a street outreach worker will physically go to those places, in an attempt to locate unsheltered homeless persons, engage them, identify needs and connect them with emergency shelter, housing or critical services, or provide them with urgent, non-facility based care. Since homeless individuals are often distrustful and uneasy sharing personal information, this process takes time and effort. Initial efforts focus on small engagements like providing hygiene kits, and providers use that initial interaction to build trust. This in turn allows greater efforts at identifying specific needs and connecting individuals with services that can benefit them. Street outreach activities can include case management, emergency health and mental health services, transportation and services for special populations.

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

The Emergency Solutions Grant Program addresses the need for emergency shelter by funding shelters who provide services outlined by HUD to those who are currently homeless. HOME ARP funds will also be available in 2024 and will provide assistance to individuals who are homeless or transitioning out of homelessness. Based on the needs assessment completed, funding will be targeted at the area of greatest identified need, or the development of affordable rental housing.

##### **C) 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**

## **AP-65 Homeless & Other Special Needs**

**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 Emergency Solutions Grant Program provides funding for services that specifically address the needs identified above, to help homeless individuals and families transition to permanent housing and to prevent the recurrence of homelessness. The goal is to use housing relocation, stabilization services or short-term rental assistance to “re-house” individuals and families living in shelters or unsheltered situations. This involves assistance to help move them, as quickly as possible, out of homelessness into a more stable housing situation and to set them up for future success. Providers can use ESG funds to assist with short-term rental assistance, rental arrears, rental application fees, security and utility deposits, utility payments, moving costs, and a range of services including housing search and placement, case management, tenant legal services, landlord-tenant mediation and credit repair.

HOME ARP funds will also be available and may be targeted toward assisting individuals who are in danger of homelessness and/or transitioning out of homelessness. Based on needs assessment completed, funding will be targeted at the area of greatest need, or development of affordable rental housing.

**D) Helping low-income individuals and families avoid becoming homeless, especially extremely low-income individuals and families and those who are: being discharged from publicly funded institutions and systems of care (such as health care facilities, mental health facilities, foster care and other youth facilities, and corrections programs and institutions); or, receiving assistance from public or private agencies that address housing, health, social services, employment, education, or youth needs**

The Emergency Solutions Grant Program has funds available for preventive services, to help eligible individuals and families avoid homelessness. Although the ESG Program has a prohibition against discharge planning that prevents the use of ESG funds to facilitate discharge, a person discharged from an institution can still benefit from the services ESG recipients can provide. Funds are available for housing relocation, stabilization services and short term rental assistance, as necessary to prevent the individual or family from moving to an emergency shelter, onto the streets or into other places not meant for human habitation. Recipients may use ESG to funding to assist with short-term rental assistance, rental arrears, rental application fees, security and utility deposits, utility payments, moving costs, and a range of services including housing search and placement, case management, tenant legal services, landlord-tenant mediation and credit repair. The goal is to prevent an individual or family from moving to an emergency shelter or into an unsheltered situation and to achieve housing stability.

Based on the needs assessment completed, HOME ARP funding will be targeted at the area of greatest need or the development of affordable rental housing.

### **Discussion**

## AP-70 HOPWA Goals

### AP-70 HOPWA Goals – 91.320(k)(4)

One year goals for the number of households to be provided housing through the use of HOPWA for:	
Short-term rent, mortgage, and utility assistance to prevent homelessness of the individual or family	230
Tenant-based rental assistance	120
Units provided in permanent housing facilities developed, leased, or operated with HOPWA funds	10
Transitional Housing, Hotel/Motel Leasing to prevent homelessness of the individual or household	10
Total	370

HOPWA Goals are also outlined in AP-90 Program Specific Requirements, HOPWA.

## **AP-75 Barriers to Affordable Housing**

### **AP-75 Barriers to affordable housing – 91.320(i)**

#### **Introduction:**

Affordable housing development can be impeded by a variety of factors including zoning and land use policy, administrative and processing procedures involved in review, permitting and approval of housing development, property taxes, exactions and fees, local building codes, transportation, development and infrastructure costs and neighborhood opposition to local affordable housing development, or an attitude known as NIMBY, or “Not In My Backyard.”

#### **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**

- For 2025, SC Housing will continue the SC Mortgage Tax Credit Program to help homebuyers make their mortgages more affordable. It is a Mortgage Credit Certificate Program administered by SC Housing which provides a federal income tax credit to qualified homebuyers for every year they occupy the home as their primary residence. This program was begun in 2012.
- SC Housing's Palmetto Heroes Program will continue to assist local “heroes” to become homeowners. Eligible homebuyer “heroes” can vary year to year, but usually include essential public safety personnel, such as law enforcement officers, fire fighters and EMS personnel; medical personnel such as nurses, correctional workers and EMS personnel. The program provides a reduced mortgage interest rate and down payment assistance.
- Palmetto Home Advantage Program offers low fixed interest rates and down payment assistance for first time home buyers.
- Country First Initiative Program is a rural initiative available to homebuyers in specifically targeted rural counties.
- SC Housing will hold Lender Partner and SC State Housing Authority Certified Real Estate Professional training classes at locations throughout the state. The Lender Partner training covers program requirements such as home price limits, income limits, and the SC Housing loan process. Certified Real Estate Professional training covers SC Housing programs availability and eligibility and requirements for SC Housing loans. Legal and Real Estate continuing education sessions were also included in the Palmetto Affordable Housing Forum. The overall purpose is to increase awareness of housing programs and resources to expand the supply of affordable housing and increase homeownership opportunities in the state.
- SC Housing will maintain its expanded social media presence as a means of communicating information to housing partners, homeowners and renters and others interested in housing in the state. The agency uses Twitter and Facebook and other innovative electronic tools and technologies has allowed it to operate more efficiently and communicate in a more dynamic and timely way.



### **AP-75 Barriers to Affordable Housing**

- SC Housing will award funds for construction or to facilitate construction of new affordable rental housing units. HOME, HTF, and other SC Housing administered funds in these projects directly lower the cost of the unit and thereby make rental units more affordable. SC Housing will provide other funds (not HOME) for down payment and closing cost assistance and below market interest rate financing to make homeownership more affordable and financing simpler and more available.
- Authority staff will spend time meeting with Senators and Representatives on an ongoing basis to educate them on the various affordable housing programs the Authority administers as well as to review several annual reports with them: Accountability Report, Affordable Housing Statewide Impact Report, Investment Report, and HTF Annual Report. This interaction enables the Senators and Representatives to understand the need for, as well as the impact of, affordable housing in their areas, and this in turn helps them discuss the positives of affordable housing when their constituents call with NIMBY issues and concerns.

#### **Discussion:**

## **AP-85 Other Actions**

### **AP-85 Other Actions – 91.320(j)**

#### **Introduction:**

The Consolidated Plan regulations require the State to address other actions to meet specific initiatives identified by HUD. These actions are summarized below.

#### **Actions planned to address obstacles to meeting underserved needs**

The primary obstacle to meeting underserved housing and community development needs of the state is funding; and existing resources continue to shrink. Demand for assistance, on the other hand, is growing as a result of recent economic conditions and typically exceeds the supply of available resources. The number of lower income individuals, families, and neighborhoods in need, coupled with the complexity of issues they face is steadily increasing in both scale and cost. The combination of these factors places substantial new burdens on an already strained housing and community development delivery system.

Capacity and resource coordination are also significant obstacles. Infrastructure deficiencies are persistent impediments to the State's ability to address long-standing community needs. Insufficient expertise, funding, and planning plague a disproportionate number of South Carolina's rural areas. Capacity limitations as well as inadequate resource coordination are barriers to undertaking crucial quality of life improvements. Consequently, much needed new development or upgrades in housing, infrastructure, and community facilities are not made. Prolonged periods of disinvestment and decline have resulted in some economic and social decline in many communities across the state.

The State's strategy to overcome existing deficiencies in its housing and community development efforts is based on collaboration, education, outreach, and comprehensive planning. Consumers, providers, funders, policy makers, advocates and communities can benefit from increased communication, training and technical assistance to establish meaningful solutions to the housing and community development needs and improved quality of life among lower income populations.

A greater emphasis is being placed on collaboration among partners as the most effective means to reach community and economic development goals. South Carolina is poised to turn a corner in its economic structure, and utilizing our resources along with others will be the only way to make positive change. CDBG is making specific efforts to help make communities more economically competitive.

The CDBG program recognizes obstacles concerning funding and underserved needs. To address limited funding, the CDBG program requires that recipients generally provide a match for most types of projects and encourages leveraging of financial and other resources. This financial vested interest on the part of the recipient encourages the timely and successful completion of projects as well as the careful selection of projects that best meet the needs of the community.

## **AP-85 Other Actions**

### **Actions planned to foster and maintain affordable housing**

The primary resources for addressing affordable housing in SC are administered by SC Housing, which administers the HOME, HTF and ARP Programs, along with the other programs described below:

- SC Housing Trust Fund - Funding is available to eligible non-profit, local government and for profit housing development sponsors in all 46 counties. Funds are awarded on an ongoing basis and can be used to finance the development of affordable group homes for the disabled, emergency shelters, single room occupancy units for working homeless and disabled veterans, multifamily rental units low-income, individuals, families, the elderly, and etc., and owner-occupied rehabilitation for homeowners that are at 80% or below the area median income for the county in which they live.
- Multifamily Tax Exempt Bond Program - provides permanent real estate financing for property being developed for multifamily rental use through the sale of tax-exempt revenue bonds. Financing is available to non-profit and for-profit sponsors, or developers, who agree to set aside: a) at least 20% of the units for households with annual gross incomes at or below 50% of the area median income, or b) 40% or more of the units for households whose annual gross income is at or below 60% of the area median.
- Low Income Housing Tax Credit Program - provides an incentive to owners developing affordable multifamily rental housing. Allocations of credits are used to leverage public, private and other funds in order to keep rents affordable. Developments that may qualify for credits include new construction, acquisition with rehabilitation, and rehabilitation and adaptive re-use. Developers who are awarded tax credits must agree to keep apartments affordable and available to lower income tenants for at least 30 years. Annually, SC Housing establishes priorities and needs in its QAP, or Qualified Tax Credit Allocation Plan. Ten percent of the State's annual LIHTC allocation is reserved for the exclusive use of joint venture projects that involve the substantive participation of qualified non-profit organizations.
- Section 8 - State-administered and includes Housing Choice Vouchers, Moderate Rehabilitation, and Homeownership Vouchers. The Voucher Program provides rental assistance in the private rental market to very low income individuals and families in Clarendon, Colleton, Dorchester, Fairfield, Kershaw, Lee and Lexington counties.

Actions planned to foster and maintain affordable housing are continued in "Discussion" section below.

### **Actions planned to reduce lead-based paint hazards**

The following are strategies and possible resources available to the State to combat the danger that lead based paint hazards present to children. Typically, Federal programs are limited in scope and are targeted to only certain population or housing sectors. Moreover, they often do not fully address testing children for elevated blood levels or abating lead from all housing, schools or childcare facilities. Attention should be focused first on units posing the greatest hazard and on strategies designed to meet the special needs of

## AP-85 Other Actions

those populations feared most at risk. South Carolina's resources to reduce the lead-based paint (LBP) hazard include:

- Lead hazard abatement is an eligible activity under the HOME, HTF and CDBG programs for projects involving repair, rehabilitation, or demolition of housing. All programs provide guidance regarding required steps to evaluate, address and/or abate lead, safe work practices, and notification procedures.
- Lead hazard requirements/guidelines consist of written notification via brochure notifying tenants and potential homebuyers of dangers of lead-based paint poisoning. All beneficiaries must read and sign the documentation prior to occupying the unit.
- SC Housing's Low Income Housing Tax Credit, Homeownership, Mortgage Assistance and Housing Trust Fund Programs require compliance, disclosure and/or testing in accordance with federal requirements.
- Recipients of HOME, HTF and CDBG funds are encouraged to identify additional sources of funding to assist with lead hazard activities related to projects where rehabilitation is not funded. Examples include HUD Lead Safe Homes and other grant programs and private sector resources that may be available.

The SC Department of Public Health participates in the Environmental Health Public Tracking System (EHPT) of the US Centers for Disease Control and Prevention. To facilitate its participation, SC DPH had to streamline its own lead database so that it could provide required EHPT data and incorporate data from the Adult Blood Lead Epidemiology and Surveillance Program.

Note that South Carolina law requires physicians to report conditions, including suspected lead poisoning, on the SC DPH List of Reportable Conditions to their local public health department, and laboratories are required to report all blood lead values in children less than six years of age. As a result, SC DPH now provides several data resources for the number and percent of children tested for lead by age group and children tested for lead with Elevated Blood Lead Levels (EBLL).

The state will also continue to take the following actions in addressing lead-based paint hazards in pre-1978 housing:

- Provide information and guidance related to lead-based paint hazard reduction to recipients of CDBG, HOME, NSP, and HTF, including training as necessary.
- Continue to require notification of residents and owners of all houses receiving CDBG, HOME, NSP, and HTF assistance regarding the hazards of lead-based paint.
- Incorporate lead hazard reduction strategies, in accordance with HUD requirements, in all HUD assisted housing rehabilitation and provide technical assistance on an as needed basis to ensure compliance with program policies and procedures and HUD notification requirements.

## AP-85 Other Actions

### Actions planned to reduce the number of poverty-level families

Poverty in South Carolina is a challenge, despite continuous efforts to combat it and despite improvement over the last five years in South Carolina, the region and the nation. The primary source for data at the county level in the US is the Census Bureau’s Small Area Income and Poverty Estimates (SAIPE), and the most recent data available was released in December 2023 for 2022. According to this data, South Carolina has a poverty rate of 14%, comparable to the 2020 estimate of 13.8% poverty. The current estimate represents 719,381 people living below poverty in South Carolina. This compares with 12.6% for the nation as a whole and rates ranging from 12.7% to 13.3% for other Southeast states. South Carolina ranks 11<sup>th</sup> highest in the nation, tied with New York, and after Mississippi (19.2%), Louisiana (18.6%), West Virginia (17.4%), New Mexico (17.3%), Arkansas (16.3%), Kentucky (16.3%), Alabama (16.2%), Oklahoma (15.6%) and the District of Columbia (14.2%).

#### South Carolina and Neighboring States Small Area Income and Poverty Estimates

State	2014	2016	2018	2020	2022
SC	17.9	15.3	15.2	13.8	14.0
TN	18.2	15.8	15.2	13.6	13.3
GA	18.4	16.1	14.5	14.0	12.9
NC	17.2	15.4	14.1	12.9	12.8
FL	16.6	14.8	13.7	12.4	12.7
US	15.5	14.0	13.1	11.9	12.6

As a state, South Carolina has the eleventh highest poverty percentage in the nation, but within the state, 36 of the state’s 46 counties have poverty rates even higher than the state. Allendale County (36.7%) remains the county with the highest poverty rate, with a rate more than two and half times that of the state. Five other counties have poverty rates more than twice as high as the state, at 28% poverty or more. Fourteen counties have poverty rates above 20% and ten others have poverty rates of 17% or more. Of the fourteen above 20% poverty:

- Allendale consistently has the highest poverty rate and consistently has a poverty rate over 30%
- Marlboro and Williamsburg consistently have poverty rates of 25% or higher
- Bamberg, Barnwell, Dillon, Lee and Marion consistently have poverty rates of 20% or higher

In most cases, county poverty rates have not improved since 2020 and are, instead, comparable with 2018. The chart below shows counties which, as of the 2022 SAIPE estimates, have poverty rates of 17% or higher.

## AP-85 Other Actions

### South Carolina Counties 2020 Small Area Income and Poverty Estimates Counties with Highest Poverty Rates

County	2018 Poverty Rate	2020 Poverty Rate	2022 Poverty Rate
Allendale County	37.3	31.6	36.7
Marion County	25.5	21.8	31.6
Dillon County	32.1	22.2	30.3
Marlboro County	30.0	26.0	28.7
Bamberg County	26.7	21.0	28.4
Lee County	28.1	23.0	27.9
Williamsburg County	26.0	25.4	26.3
Orangeburg County	25.9	19.1	24.6
Hampton County	25.8	19.6	21.9
Barnwell County	22.4	21.6	21.2
Darlington County	23.5	18.9	20.9
Florence County	18.0	17.1	20.4
Clarendon County	26.4	18.4	20.3
Colleton County	20.0	20.1	20.3
Chesterfield County	20.9	19.7	19.6
Greenwood County	18.3	16.4	18.4
Union County	20.4	14.9	18.4
Fairfield County	23.7	17.6	18.1
Laurens County	19.7	18.4	18.0
Chester County	18.2	18.3	17.9
Newberry County	17.1	16.4	17.4
Cherokee County	16.8	14.6	17.3
Jasper County	19.0	18.4	17.2
McCormick County	18.6	17.0	17.0

Addressing the poverty issue falls within the purview of numerous state agencies, including the Department of Social Services, the Department of Employment and Workforce, the Department of Health and Human Services, the Department of Education, the Commission on Minority Affairs and the Department of Commerce. Each of these agencies has a mission and undertakes planning activities (such as TANF plans) which encompass one or more of the factors shown to cause poverty: insufficient education, lack of economic opportunity, health and social problems and lack of self-sufficiency. The key means with which a state can combat poverty in the short-term is to create economic opportunity and provide opportunities for working age adults to improve skill levels and successfully compete for new and better paying jobs as these opportunities become available. Over the longer term, K-12 education and programs to combat health and social problems and address disparities in access to services and support are also important. The latter, however, are beyond the scope of the agencies involved in this Consolidated Plan.

What is within the scope of the Consolidated Plan is the expansion of economic opportunity, by addressing issues which are obstacles to economic opportunity. More than \$60 million was appropriated for Rural Development, to focus on issues and funding in the state’s most rural and distressed areas. This funding is

## **AP-85 Other Actions**

being managed, along with CDBG, by the Department of Commerce. Program planning is continuing in conjunction with development of the CDBG 2025 plan. CDBG funds for 2025 will continue to be used to help achieve the economic opportunity objective by making funding available for projects that will help address low workforce skills, absence or inadequacy of basic public infrastructure and services needed to support economic growth, and downtown and commercial centers that lack vitality and are not conducive to small local business growth, residential growth or a large and thriving employer base. For those areas which can support business and industrial growth, CDBG funds can also be used, where appropriate and feasible, to help facilitate job creation by new or existing expanding businesses. The CDBG Program Description describes programs of CDBG funding that can assist with expanding economic opportunity and business development or job creation/retention for the 2025 Program Year.

### **Actions planned to develop institutional structure**

The State's strategy to enhance its housing and community development institutional structure centers around improved education, outreach, comprehensive planning and coordination. Consumers, providers, financiers, policy makers, advocates and communities benefit from increased cross-sector communication (dialogue) and education in understanding that economic factors are inextricably linked with meaningful solutions to housing needs and improved quality of life among lower income populations.

Both public and private sector agencies, organizations and institutions contribute to the State's delivery infrastructure for affordable housing and community development. These agencies and organizations are important development partners in South Carolina. Some have established histories as partners with the State; many more are new and emerging collaborators. All are tremendously vital resources in South Carolina's continuing challenge to address the affordable housing and improved community and economic development needs of lower income households.

In terms of housing development in particular, coordination is facilitated by combining the administration of HOME and most other federal and state programs for housing in one agency: SC Housing. Community and economic development are the mission of the SC Department of Commerce, which manages CDBG as well as other state resources that can be used for these two purposes, notably including Appalachian Regional Commission and Southeast Crescent Regional Commission funding and the State Rural Infrastructure Fund. The Secretary of the SC Department of Commerce also heads the board of the State Rural Infrastructure Authority. Finally, the SC Department of Commerce and Rural Infrastructure Authority routinely meet with other sources of infrastructure funding, such as the SC Department of Public Health, US Economic Development Administration, and USDA, to discuss projects, needs and priorities in an effort to better coordinate the delivery system.

Together, agencies and organizations in the state contribute significant financial and technical resources to benefit low and moderate income individuals and families of the State. These contributions help capitalize outreach, education and development initiatives. Private and local funds are leveraged with Federal and State funds in order to implement affordable housing and community development initiatives Statewide.

## **AP-85 Other Actions**

Each entity, public or private, pass-through or direct provider, offers services to low income persons and is considered a critical component of South Carolina's housing and community development delivery system.

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

The SC State Finance and Development Authority does not own or operate any public housing. However, private developers that receive Authority funds are encouraged to communicate with other housing providers within a project's community as part of the project development process.

#### **Discussion:**

- SFHDA also administers SC Help aimed at maintaining homeownership and making it more affordable and sustainable by providing direct assistance to homeowners potentially facing foreclosure. This program is also winding down.
- Mortgage Revenue Bond Program - the State's primary tool for expanding homeownership opportunities for low and moderate income families in South Carolina. The sale of tax exempt bonds to investors provides the bulk of the funding available to qualified, first-time homebuyers. Banks and mortgage companies originate mortgage loans on the agency's behalf and offer them at reduced interest rates. This below market rate financing provides the edge needed to make homeownership affordable for many of the State's lower income residents. Maximum purchase price and borrower income limits apply and typically vary by county.



## AP 90 Program Specific Requirements

### AP-90 Program Specific Requirements – 91.320(k)(1,2,3)

#### Introduction:

#### Community Development Block Grant Program (CDBG) Reference 24 CFR 91.320(k)(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
<b>Total Program Income:</b>	<b>0</b>

#### 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%

## **AP 90 Program Specific Requirements**

### **HOME Investment Partnerships Reference 24 CFR 91.320(k)(2)**

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

No other forms of investment are anticipated being used.

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:

There are no plans to finance homeownership activities.

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:

There are no plans to finance homeownership activities.

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 to refinance debt.

## **AP 90 Program Specific Requirements**

### **Emergency Solutions Grant Program Reference 91.320(k)(3)**

1. Include written standards for providing ESG assistance (may include as attachment)

In order to receive ESG assistance, an individual or family must fit one of the HUD definitions of homeless, chronically homeless or at risk of homelessness. These definitions are included at the bottom of this section.

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

All four CoC's have established a basic CES system. Right now State ESG staff, as well as a HUD representative, participate in the policy and procedures standards committee. Currently, highest ranking of VI-SPADAT + location and other various attributes will get an individual served first in CES.

3. Identify the process for making sub-awards and describe how the ESG allocation is available to private nonprofit organizations (including community and faith-based organizations).

Awards will be made through an application and scoring process. Applications received from agencies in one Continuum of Care region will be compared to other applications from other agencies within their continuum as opposed to all applications from all areas of the State. This was new beginning in 2018, at which time State ESG staff also began consulting with each continuum to help identify specific needs in each continuum.

4. If the jurisdiction is unable to meet the homeless participation requirement in 24 CFR 576.405(a), the jurisdiction must specify its plan for reaching out to and consulting with homeless or formerly homeless individuals in considering policies and funding decisions regarding facilities and services funded under ESG.

Homeless participation is a requirement of the application. Failure to demonstrate this in an application means the application is incomplete and therefore not eligible.

5. Describe performance standards for evaluating ESG.

Subrecipients are evaluated based on planned expenditures vs actual expenditures. While this is the most important aspect, ESG staff also look at planned number of people served vs actual people served and take into account accurate and timely submission of all requested reports and information.

## **AP 90 Program Specific Requirements Housing Trust Fund**

Reference 24 CFR 91.320(k)(5)

### **1. How will the grantee distribute its HTF funds? Select all that apply:**

Applications submitted by eligible recipients

**2. If distributing HTF funds through grants to subgrantees, describe the method for distributing HTF funds through grants to subgrantees and how those funds will be made available to state agencies and/or units of general local government. If not distributing funds through grants to subgrantees, enter "N/A".**

N/A

### **3. If distributing HTF funds by selecting applications submitted by eligible recipients,**

**a. Describe the eligibility requirements for recipients of HTF funds (as defined in 24 CFR § 93.2). If not distributing funds by selecting applications submitted by eligible recipients, enter "N/A".**

Eligible Recipient: An organization, agency, or other entity (including a public housing agency, a for profit or a nonprofit entity) that receives assistance as an owner or developer to carry out an affordable housing project. An eligible recipient must:

1. Make acceptable assurances to the Authority that it will comply with the requirements of all applicable federal and state housing programs during the entire period that begins upon selection of the recipient to receive funding, and ending upon the conclusion of all funded activities;
2. Demonstrate the ability and financial capacity to undertake, comply, and manage the eligible activity(ies);
3. Demonstrate its familiarity with the requirements of other federal, state, or local housing programs that may be used to ensure compliance with all applicable requirements and regulations of such programs; and
4. Have demonstrated experience and capacity to conduct an eligible activity(ies) as evidenced by its ability to own, construct, and manage and operate an affordable multifamily rental housing development.
5. Meet the experience and financial capacity requirements described in the attached draft of the 2025 Small Rental Development Program draft of the Application Manual.

## **AP 90 Program Specific Requirements Housing Trust Fund**

**b. Describe the grantee’s application requirements for eligible recipients to apply for HTF funds. If not distributing funds by selecting applications submitted by eligible recipients, enter “N/A”.**

Please see the AP-30 HTF Method of Distribution.

**c. Describe the selection criteria that the grantee will use to select applications submitted by eligible recipients. If not distributing funds by selecting applications submitted by eligible recipients, enter “N/A”.**

Please see the AP-30 HTF Method of Distribution.

**d. Describe the grantee’s required priority for funding based on geographic diversity (as defined by the grantee in the consolidated plan). If not distributing funds by selecting applications submitted by eligible recipients, enter “N/A”.**

As described in the 2021-2025 South Carolina State Consolidated Plan for Housing and Community Development, there are no specified geographic priorities or regional targeting of funds as it pertains to HUD programs, with the exception of the HOPWA program. As such, HTF will be available statewide to the highest ranked applications until all HTF funds are exhausted. There will be a preference given to those counties in which SC Housing has not awarded HOME or HTF funds in the last five years.

**e. Describe the grantee’s required priority for funding based on the applicant's ability to obligate HTF funds and undertake eligible activities in a timely manner. If not distributing funds by selecting applications submitted by eligible recipients, enter “N/A”.**

Eligible Applicants must demonstrate experience and capacity to develop an eligible SRDP project as evidenced by the ability to own, construct, or rehabilitate rental housing developments. Applicants must demonstrate the capacity to successfully develop the type of units being proposed in the SRDP application. Successfully developing means coordinating the development team in planning, financing and constructing a development through the receipt of Certificates of Occupancy (COs) and reaching stabilized occupancy. Applicants may use the experience of a consultant to meet these requirements. If using a consultant, the consultant must be under contract and the scope of work identified in the contract must specify the consultant’s responsibilities related to the administration of the project. The services of the consultant must be utilized for the entire development phase of the project, from application submission to placed-in-service. If using the experience of a consultant the SRDP Application Exhibit 5 – Consultant Certification must be completed and submitted with the application.

a. Applicants proposing 4-8 unit new construction developments must meet the following experience requirements: i. If proposing single family rental homes, the applicant must have experience within the last ten years of successfully developing and operating a minimum of two single family rental homes or a minimum of one multi-family development consisting of at least five units. ii. If proposing a

## **AP 90 Program Specific Requirements Housing Trust Fund**

multi-family rental development, the applicant must have experience within the last ten years of successfully developing and operating a minimum of one multi-family development consisting of at least five units or a minimum of five single family units.

b. Applicants proposing 9-39 unit new construction developments must meet the following experience requirements: i. If proposing single family rental homes, the applicant must have experience within the last ten years of successfully developing and operating a minimum of four single family rental homes or one multifamily development consisting of at least five units using at least one federal funding source. ii. If proposing multi-family rental housing, the applicant must have experience within the last ten years of successfully developing and operating a minimum of two multi-family developments of at least five units each or eight single family homes, using at least one federal funding source in each development.

c. Applicants proposing rehabilitation developments must meet the following experience requirements: i. If proposing the rehabilitation of single family homes requiring lead and/or asbestos abatement, the applicant must have experience within the last ten years successfully completing the rehabilitation of and operating at least one single family home that required the abatement of lead and/or asbestos. ii. If proposing the rehabilitation of a multi-family development requiring lead and/or asbestos abatement, the applicant must have experience within the last ten years of successfully completing the rehabilitation of and operating at least one multi-family development of at least five units that required the abatement of lead and/or asbestos. iii. If proposing the rehabilitation of single family or multi-family developments that require the permanent relocation of tenants, the applicant must have experience within the last eight years of successfully administering the permanent relocation of tenants in compliance with the Uniform Relocation Assistance and Real Property Acquisition Policies Act (URA) 49 CFR Part 24 and Section 104(d) 24 CFR Part 42 regulations.

**f. Describe the grantee's required priority for funding based on the extent to which the rental project has Federal, State, or local project-based rental assistance so that rents are affordable to extremely low-income families. If not distributing funds by selecting applications submitted by eligible recipients, enter "N/A".**

This year, SC Housing is including a preference for PBRA in SRDP.

**g. Describe the grantee's required priority for funding based on the financial feasibility of the project beyond the required 30-year period. If not distributing funds by selecting applications submitted by eligible recipients, enter "N/A".**

## **AP 90 Program Specific Requirements Housing Trust Fund**

This year, SC Housing is not asking Applicants to voluntarily take on a longer affordability period than the required 30-year period. SC Housing will ensure all awarded applications are able to cash flow for the entire 30-year period, which is a difficult task.

**h. Describe the grantee's required priority for funding based on the merits of the application in meeting the priority housing needs of the grantee (such as housing that is accessible to transit or employment centers, housing that includes green building and sustainable development features, or housing that serves special needs populations). If not distributing funds by selecting applications submitted by eligible recipients, enter "N/A".**

Please see the AP-30 HTF Method of Distribution.

**i. Describe the grantee's required priority for funding based on the extent to which the application makes use of non-federal funding sources. If not distributing funds by selecting applications submitted by eligible recipients, enter "N/A".**

All applications for HTF may also be eligible to receive SC HTF, which is a non-federal funding source administered by SC Housing. Using non-federal funding sources is such a priority that it has been made mandatory since 2018.

**4. Does the grantee's application require the applicant to include a description of the eligible activities to be conducted with HTF funds? If not distributing funds by selecting applications submitted by eligible recipients, select "N/A".**

Yes

**5. Does the grantee's application require that each eligible recipient certify that housing units assisted with HTF funds will comply with HTF requirements? If not distributing funds by selecting applications submitted by eligible recipients, select "N/A".**

Yes

**6. Performance Goals and Benchmarks. The grantee has met the requirement to provide for performance goals and benchmarks against which the grantee will measure its progress, consistent with the grantee's goals established under 24 CFR 91.315(b)(2), by including HTF in its housing goals in the housing table on the SP-45 Goals and AP-20 Annual Goals and Objectives screens.**

Yes

## **AP 90 Program Specific Requirements Housing Trust Fund**

**7. Maximum Per-unit Development Subsidy Amount for Housing Assisted with HTF Funds.** Enter or attach the grantee's maximum per-unit development subsidy limits for housing assisted with HTF funds.

The limits must be adjusted for the number of bedrooms and the geographic location of the project. The limits must also be reasonable and based on actual costs of developing non-luxury housing in the area.

If the grantee will use existing limits developed for other federal programs such as the Low Income Housing Tax Credit (LIHTC) per unit cost limits, HOME's maximum per-unit subsidy amounts, and/or Public Housing Development Cost Limits (TDCs), it must include a description of how the HTF maximum per-unit development subsidy limits were established or a description of how existing limits developed for another program and being adopted for HTF meet the HTF requirements specified above.

SC Housing is adopting the HOME Investment Partnerships Program's High Cost (240% Section 234 condominium housing, elevator type) maximum per-unit subsidy limits for 2025 HTF funding. The HOME per-unit subsidy limits are being elected for consistency as HOME funds are also used in the Authority's Small Rental Development Program (SRDP).

Please see the AP-30 HTF Method of Distribution.

**8. Rehabilitation Standards.** The grantee must establish rehabilitation standards for all HTF-assisted housing rehabilitation activities that set forth the requirements that the housing must meet upon project completion. The grantee's description of its standards must be in sufficient detail to determine the required rehabilitation work including methods and materials. The standards may refer to applicable codes or they may establish requirements that exceed the minimum requirements of the codes. The grantee must attach its rehabilitation standards below.

In addition, the rehabilitation standards must address each of the following: health and safety; major systems; lead-based paint; accessibility; disaster mitigation (where relevant); state and local codes, ordinances, and zoning requirements; Uniform Physical Condition Standards; and Capital Needs Assessments (if applicable).

Yes. Please see the HOME & HTF attachments to this Action Plan for SC Housing's HTF Rehabilitation Standards, which are attached in the 2025 Small Rental Development Program Manual. Note that rehab policies were initially submitted with the 2020 Annual Action Plan and approved by HUD.

**9. Resale or Recapture Guidelines.** Below, the grantee must enter (or attach) a description of the guidelines that will be used for resale or recapture of HTF funds when used to assist first-



**AP 90 Program Specific Requirements  
Housing Trust Fund**

time homebuyers. If the grantee will not use HTF funds to assist first-time homebuyers, enter "N/A".

N/A

**10. HTF Affordable Homeownership Limits.** If the grantee intends to use HTF funds for homebuyer assistance and does not use the HTF affordable homeownership limits for the area provided by HUD, it must determine 95 percent of the median area purchase price and set forth the information in accordance with §93.305. If the grantee will not use HTF funds to assist first-time homebuyers, enter "N/A".

**11. Any limitation or preference must not violate nondiscrimination requirements in § 93.350, and the grantee must not limit or give preferences to students. The grantee may permit rental housing owners to limit tenants or give a preference in accordance with § 93.303(d)(3) only if such limitation or preference is described in the action plan.**

N/A

**12. Refinancing of Existing Debt.** Enter or attach the grantee's refinancing guidelines below. The guidelines describe the conditions under which the grantee will refinance existing debt. The grantee's refinancing guidelines must, at minimum, demonstrate that rehabilitation is the primary eligible activity and ensure that this requirement is met by establishing a minimum level of rehabilitation per unit or a required ratio between rehabilitation and refinancing. If the grantee will not refinance existing debt, enter "N/A."

N/A

## **AP 90 Program Specific Requirements HOPWA**

HOPWA project sponsors are selected through a competitive grants request for applications (RFGA) process. The RFGAs are advertised on the SC DPH website and in the South Carolina Business Opportunities (SCBO) newsletter in the fall preceding the March 31st end of the contract period.

All providers known by SC DPH to be serving people living with HIV/AIDS are contacted regarding the release of the RFGA. Grass-roots faith based organizations and other community-based organizations are eligible to apply.

HOPWA RFGA Award Notification is posted on the SC DPH website. Emails with the link to the Award Notification are sent to all applicants. After the dispute period, grant agreements are made with the awarded entity. These contracts typically run for 3 years.

SC DPH distributes the funds to regional Ryan White Part B Service Providers, eligible non-profit organizations and/or local health departments that assist persons with HIV/AIDS.

HOPWA Goals are specifically addressed on AP-70 HOPWA Goals – 91.320(k)(4).