



AAHSA Fact Sheet

Making the Most of Your Local Consolidated Plan

Need Some Free Money?

If you're not already aware of it, your local Consolidated Plan could offer you a way to find funding for those special projects needing attention in your facility or for programs or services to help your residents. What's a Consolidated Plan? Well, it is a document that jurisdictions submit to HUD if they receive funding under any of HUD's Community Planning and Development formula grant programs, including the Community Development Block Grant (CDBG), Emergency Shelter and HOME programs. The consolidated plan also serves as the jurisdiction's planning document for the use of the funds received under these programs. The Consolidated Plan is done every 5 years, with an annual update or "Action Plan" developed each year with specific program targets.

The plan is developed as the result of a participatory process among citizens, organizations, businesses, and other stakeholders – and senior housing providers are historically not known for being very involved. But, now things have changed somewhat and you may find yourself actually being solicited, perhaps for the first time, to participate.

Even if no one comes to you to invite your participation, and even if you think you're really just too busy, it's well worth finding out more about the Consolidated Plan in your area and getting involved. You might even find that, at the end of your local plan's fiscal year, some funds may yet be available - and local planners would be grateful for the opportunity to have you use them. Whatever they don't use one year reduces the amount they are eligible for the next. CDBG funds are allocated by HUD based on a mathematical formula, not local request.

Consolidated Plan Revisions and Updates; Final Rule

Issued February 9, 2006, the final rule makes streamlining and clarifying changes to the consolidated plan regulations of state and local governments so that the plans are more results-oriented and useful to communities in assessing their own progress toward addressing the problems of low-income areas. The rule also eliminates obsolete and redundant provisions and makes other changes as well.

Revisions Highlight Senior Housing Provider Involvement, Tax Credits

The rule, which becomes effective March 13, 2006, contains a number of revised development and reporting policies adapted from demonstration models examining ways to make the plan more effective, and addresses new required elements for the plan. Particularly noteworthy is that the plan documents will now emphasize inclusion of

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a broader list of stakeholders in the consolidated planning process and encouraging jurisdictions to explore alternative public involvement techniques such as focus groups and use of the Internet.

Revisions to the rule now explicitly state that, “When preparing the consolidated plan, the jurisdiction **shall** consult with other public and private agencies that provide **assisted housing, health services**, and social and fair housing services (including those focusing on services to children, **elderly** persons, persons with disabilities, persons with HIV/AIDS and their families, homeless persons) during preparation of the consolidated plan. (emphasis ours – taken directly from the revised rule, Section 91.100 Consultation: local governments) So, check with your City or County, or State to see if they have any federal funds from HUD available for special projects. And get involved in helping establish

Another particularly notable component of the revised rule is an emphasis on inclusion of the Low Income Housing Tax Credit. While not administered by HUD, the rule says that, “the importance of the LIHTC program to jurisdictions cannot be overstated as a means of accomplishing the goals of a jurisdiction to provide housing for extremely low-income and low-income households.”

The complete rule can be found at http://www.hudclips.org/sub_nonhud/cgi/pdf/1182.pdf

Find your current local consolidated plan at <http://www.hud.gov/offices/cpd/about/conplan/local/index.cfm> and more on the data that helps inform the plans at <http://www.huduser.org/datasets/cp.html>

[NOTE: We here at AAHSA would also love to hear from those of you who have successfully tapped-into local Consolidated Planning processes and/or accessed CDBG funds. Through your information, we may discover ways to help your fellow members make better use of this valuable resource.]

For more information on these and other HUD management issues, contact Colleen Bloom, AAHSA's Associate Director for Housing Operations, at (202) 508-9483 or cbloom@aahsa.org.

Additional information/analysis below comes from the National Low Income Housing Coalition's electronic newsletter, Memo to Members, dated February 10, 2006:

***** Final Consolidated Plan regulations published**

On February 9, the Office of Community Planning and Development (CPD) published final revisions and updates to the Consolidated Plan (ConPlan) regulations (24 CFR Part 91). Proposed rules were issued on December 30, 2004 to streamline and clarify the regulations, and to add language pertaining to Public Housing Agency (PHA) Plans required by the 1998 Quality Housing and Work Responsibility Act (QHWRA).

The old Priority Needs Table indicating “high,” “medium,” and “low” priority, seldom employed in a meaningful way by many jurisdictions, will no longer be used. The regulations have been modified to make it clear that jurisdictions must describe the relationship between the fund allocation priorities and the extent of need given to each category of priority needs, particularly among extremely low, low, and moderate income households. The preamble says “the consolidated plan should be explicit about what the jurisdiction intends to do with formula grant funds in the context of [the jurisdiction’s] larger strategy.” It adds, “The rationale for establishing the allocation priorities should flow logically from the analysis [of needs]. As part of the analysis, the jurisdiction must also identify any obstacles to addressing underserved needs.”

The long-term Strategic Plan must describe how the jurisdiction will address the needs of public housing, including the need to increase accessible units. It must also describe activities to encourage public housing residents to be more involved in management. As required by QHWRA, if there is a troubled public housing agency, the Strategic Plan and Annual Action Plan must describe how the jurisdiction will provide financial or other aid to improve the PHA's operations and remove it from the “troubled” list. HUD can reject a ConPlan if this description is not included.

The Housing Market Analysis must now include an inventory of facilities and services that meet the needs of chronically homeless people, and to the extent possible, an estimate of the percentage or number of beds and service programs assisting them. This section now also requires data on the number of vacant or abandoned buildings and whether they are suitable for rehabilitation, to the extent information is available. HUD plans to annually provide U.S. Postal Service information about vacancies at the Census tract level.

Although advocates asked for greater integration between the ConPlan and the Analysis of Impediments (AI) to affirmatively furthering fair housing, HUD declined to address this, stating that the final rule “focuses on streamlining.” However, HUD does say that the issue “merits separate consideration and consultation,” and it is considering a proposed rule. As suggested by advocates, the lead-based paint hazards section must outline actions to increase access to housing without such hazards and show how the plan for reducing hazards is related to the extent of lead poisoning hazards.

Two new sets of one-year affordable housing goals must be in the Annual Action Plan. One set are goals for the number of non-homeless, homeless, and special-needs households to be provided affordable housing. The other set are goals indicating the number of households to be provided affordable housing through rental assistance, new units, rehabbed units, and units newly acquired.

Other changes include:

- “Preserving affordable housing units that may be lost from the assisted housing inventory” is listed as a potential priority use of funds.
- An estimate of the percentage of funds planned for target areas, “when appropriate.”
- A modification of the priority needs table to clarify that the category “people with disabilities” is not limited to those needing supportive services.
- An expansion of efforts to encourage public participation beyond low income people to include businesses, developers, and other institutions.