

THE NSP SUBSTANTIAL AMENDMENT

Jurisdiction(s): <u>City of Lauderhill</u> <i>(identify lead entity in case of joint agreements)</i>	NSP Contact Person: Jane Sullivan Address: 3800 Inverrary Blvd; Suite 306; Lauderhill, Florida 33319 Telephone: 954-730-3000
Jurisdiction Web Address: www.lauderhill-fl.gov <ul style="list-style-type: none">• <i>(URL where NSP Substantial Amendment materials are posted)</i>	Fax: 954-730-3025 Email: jsullivan@lauderhill-fl.gov

A. AREAS OF GREATEST NEED

Provide summary needs data identifying the geographic areas of greatest need in the grantee's jurisdiction.

Note: An NSP substantial amendment must include the needs of the entire jurisdiction(s) covered by the program; states must include the needs of communities receiving their own NSP allocation. To include the needs of an entitlement community, the State may either incorporate an entitlement jurisdiction's consolidated plan and NSP needs by reference and hyperlink on the Internet, or state the needs for that jurisdiction in the State's own plan. The lead entity for a joint program may likewise incorporate the consolidated plan and needs of other participating entitlement jurisdictions' consolidated plans by reference and hyperlink or state the needs for each jurisdiction in the lead entity's own plan.

HUD has developed a foreclosure and abandonment risk score to assist grantees in targeting the areas of greatest need within their jurisdictions. Grantees may wish to consult [this data](#), in developing this section of the Substantial Amendment.

Response:

The City of Lauderhill, centrally located within Broward County, includes 8.3 square miles of land with a population of 69,693 living in 25,667 residential properties. The City of Lauderhill spans 12 census tracts of which 11¹ meet HUD's LMMI requirements for individuals and families whose incomes do not exceed 120 percent of area median income. The City of has identified the 11 census tract as the areas of greatest need as named in the Summary Needs Data below: 1) number and percentage of foreclosed homes; 2) number and percentage of subprime loans; and 3) risk factor criteria provided by HUD on attached map.

¹ Federal Financial Institutions Examination Council (www.FFIEC.gov)

Summary Needs Data

Census Tract #	Number of Foreclosures	Foreclosure Rate	Subprime Rate	% 120 AMI	Abandonment Risk Score	
Central	603.2	247	14.7	63.9%	82.3	10
	603.3	156	15	65.4%	92.3	10
	603.4	117	15.2	66.1%	90.1	10
Priority 1	Rate Averages: 15%		65%	88%	10	
East	604.1	213	13.2	55.1%	77.4	10
	604.2	251	15	65.6%	80.6	10
	604.3	121	13.2	55.9%	74.9	10
Priority 2	Rate Averages: 14%		59%	78%	10	
Annex (south)	412	81	13.6	58.8%	90.5	10
	413	255	14.1	62.3%	87.6	10
Priority 3	Rate Averages: 14%		60%	89%	10	
North	601.10	392	11.3	45.3%	64.3	9
	601.14	281	10.1	38.8%	51.60	9
	603.1	241	11.1	44.2%	65.8	10
Priority 4	Rate Averages: 11%		43%	61%	9	

The City of Lauderdale utilized the following data sources:

- HUD NSP HUD User website²
- DataPlace³
- FFIEC¹

B. DISTRIBUTION AND USES OF FUNDS

Provide a narrative describing how the distribution and uses of the grantee’s NSP funds will meet the requirements of Section 2301(c)(2) of HERA that funds be distributed to the areas of greatest need, including those with the greatest percentage of home foreclosures, with the highest percentage of homes financed by a subprime mortgage related loan, and identified by the grantee as likely to face a significant rise in the rate of home foreclosures. *Note:* The grantee’s narrative must address these three stipulated need categories in the NSP statute, but the grantee may also consider other need categories.

Response:

Based upon the Cities analysis provided in Section A, the 11 census tracts meet all three stipulated need categories. The Census Tracts are clustered by neighborhoods and prioritized by the highest concentration of foreclosure rates and likelihood of significant rise in foreclosures. All funds will be used to assist individuals and families earning no greater than 120% AMI with a minimum of 25% of the funds being used to assist individuals and families earning no greater than 50% AMI. All activities will meet the HUD Low and Moderate Income benefit objective as redefined by HUD for the NSP up to 120% AMI.

² HUD NSP (www.huduser.org/publications/commdevl/nsp.html)

³ Dataplace (www.dataplace.org)

C. DEFINITIONS AND DESCRIPTIONS

(1) Definition of “blighted structure” in context of state or local law.

Response:

In context of local law, the City of Lauderdale law does not define the term “blighted structure.” For the purposes of the NSP program, any building that meets the City of Lauderdale’s definition of “Unsafe Structures” will qualify as a blighted structure. Local law defines an “Unsafe Structure” as follows:

“Buildings or structures that are unsafe, unsanitary or deficient in adequate facilities for means of egress, or which constitute a fire or windstorm hazard, or illegal or improper use, occupancy or maintenance, or which do not comply with the provisions of the minimum housing standards, or which have been substantially damaged by the elements, acts of God, fire, explosion or otherwise, shall be deemed unsafe buildings and a permit shall be obtained to demolish the structure or bring the building to comply with the applicable codes.”

This definition falls within the HUD definition of “blighted structure,” which is as follows:

A structure is blighted when it exhibits objectively determinable signs of deterioration sufficient to constitute a threat to human health, safety, and public welfare.

(2) Definition of “affordable rents.” *Note:* Grantees may use the definition they have adopted for their CDBG program but should review their existing definition to ensure compliance with NSP program –specific requirements such as continued affordability.

Response:

Rents that do not exceed 30% of gross household for families earning 50% AMI as determined by HUD with adjustments for number of bedrooms in the unit as more particularly described in 24 CFR Part 92.252.b.1.

The maximum Affordable Rents shall not exceed the Fair Market Rents (FMR) as published annually by the U.S. Department of Housing and Urban Development for the Fort Lauderdale, FL Metropolitan Statistical Area (MSA). The Proposed FY 2009 FMR rents are listed below:

	Efficiency	1 Bedroom	2 Bedroom	3 Bedroom	4 Bedroom
FMR	\$977	\$1,092	\$1,313	\$1,816	\$2,306

Source: U.S. Department of Housing and Urban Development, 2009

The County will review and approve the rents charged on an annual basis.

(3) Describe how the grantee will ensure continued affordability for NSP assisted housing.

Response:

The City of Lauderdale will utilize the affordability requirements of the HOME program for prescribing the periods of continued affordability for NSP assisted activities.

Homeownership Programs:

Subsidy/Assistance Amount	Period of Affordability
<\$15,000	5 years
\$15,000-\$40,000	10 years
\$40,000+	15 years

Rental Programs:

Subsidy/Assistance Amount	Period of Affordability
<\$15,000/unit	5 years
\$15,000-\$40,000/unit	10 years
\$40,000+/unit	15 years
New construction	20 years

For both rental and homeownership programs utilizing NSP funds, the City of Lauderdale will utilize mortgages and restrictive covenants to ensure continued affordability of NSP assisted housing. Any funds recaptured from NSP activities will be administered consistent with the requirements of HERA.

(4) Describe housing rehabilitation standards that will apply to NSP assisted activities.

Response:

All housing rehabilitation activities assisted by NSP funds will meet federal Housing Quality Standards guidelines and City of Lauderdale building codes.

D. LOW INCOME TARGETING

Identify the estimated amount of funds appropriated or otherwise made available under the NSP to be used to purchase and redevelop abandoned or foreclosed upon homes or residential properties for housing individuals or families whose incomes do not exceed 50 percent of area median income: \$ 1,073,322 .

Note: At least 25% of funds must be used for housing individuals and families whose incomes do not exceed 50 percent of area median income.

Response:

The City of Lauderdale will expend 25% of the total grant amount under the NSP to purchase and redevelop abandoned or foreclosed upon homes or residential properties for housing individuals or families whose incomes do not exceed 50 percent of area median income (AMI) for Broward County is \$64,000. A family of four with an income equal to 50% of AMI earns \$35,600 per year.

E. ACQUISITIONS & RELOCATION

Indicate whether grantee intends to demolish or convert any low- and moderate-income dwelling units (i.e., $\leq 80\%$ of area median income).

If so, include:

- The number of low- and moderate-income dwelling units—i.e., $\leq 80\%$ of area median income—reasonably expected to be demolished or converted as a direct result of NSP-assisted activities.
- The number of NSP affordable housing units made available to low-, moderate-, and middle-income households—i.e., $\leq 120\%$ of area median income—reasonably expected to be produced by activity and income level as provided for in DRGR, by each NSP activity providing such housing (including a proposed time schedule for commencement and completion).
- The number of dwelling units reasonably expected to be made available for households whose income does not exceed 50 percent of area median income.

Response:

As part of the acquisition process of foreclosed homes, if the cost to rehabilitate the unit is greater than fifty percent (50%) of the acquisition price, and/or the cost of acquisition and rehabilitation exceeds one hundred percent (100%) loan-to-value, the City will evaluate the property to determine if demolition is an option. If demolition is economically feasible, the City will use NSP Funds and/or other County affordable housing funds to construct a new unit.

F. PUBLIC COMMENT

Provide a summary of public comments received to the proposed NSP Substantial Amendment.

Note: proposed NSP Substantial Amendment must be published via the usual methods and posted on the jurisdiction's website for no less than 15 calendar days for public comment.

Response:

The City of Lauderhill's NSP Plan was posted on the City's website Monday, November 10th and advertised in local media and open for public discussion.

As of December 1, 2008 there were no comments from the public.

The City of Lauderhill's NSP Plan was posted again on December 8, 2008 and ran till December 26, 2008 for public comment.

There were no comments from the public.

G. NSP INFORMATION BY ACTIVITY (COMPLETE FOR EACH ACTIVITY)

(1) Activity Name: Administration / Planning

(2) Activity Type:

(1) NSP eligible use: plan and administer activities under Lauderhill's Neighborhood Stabilization Program.

(2) CDBG eligible activity: program administrative activities eligible under 24 CFR 570.206.

(3) National Objective: benefiting low, moderate and middle income persons, as defined in the NSP Notice—i.e., $\leq 120\%$ of area median income.

(4) Activity Description:

Program Administration will be used for the reasonable costs of overall program management, coordination, monitoring, and evaluation. Such costs include (but are not limited to) salaries, wages, and related costs of staff engaged in program administration, which includes (but is not limited to) providing information about the program, preparing program budget and schedules, preparing reports, and other costs for goods or services needed for administration of the program

(5) Location Description: N/A

(6) Performance Measures Compliance with eligible use for Administration and Planning defined in 24 CFR 570.205 and 206.

(7) Total Budget: \$429,328 (10% of City of Lauderhill's NSP Allocation \$4,293,288)

(8) Responsible Organization: City of Lauderhill; 3800 Inverrary Boulevard; Suite 306; Lauderhill, FL 33319; Jane Sullivan, 954-730-3000; email: jsullivan@lauderhill-fl.gov

(9) Projected Start Date: September 29, 2009

(10) Projected End Date: February 28, 2013

(11) Specific Activity Requirements:

NSP funds will be used to pay reasonable program administration costs related to the planning and execution of the activities listed above. This includes costs related to staffing for overall program management, coordination, monitoring, reporting, and direct and indirect charges. Planning costs include development fees and other soft/project related costs that are fair and reasonable as part of the acquisition and rehabilitation process.

(1) Activity Name: Acquisition; Rehabilitation, Redevelopment and Resale

(2) Activity Type: Eligible NSP use: Purchase and rehabilitate homes and residential properties that have been abandoned or foreclosed upon, in order to sell, rent, or redevelop such homes and properties.

CDBG eligible activity: 24 CFR 570.201(a) Acquisition (b) Disposition, (i) Relocation (n) (Direct homeownership assistance) and 24 CFR 570.202 (Rehabilitation and preservation activities for homes and other residential properties)

(3) National Objective: benefiting low, moderate and middle income persons, as defined in the NSP Notice—i.e., $\leq 120\%$ of area median income

(4) Activity Description: The City will work with lenders to acquire homes that have been foreclosed, vacant for at least 90 days, and are on the lender's or investor's current inventory. The homes will be purchased from banks at a discount of at least 1% (less than the current market appraised value) for individual properties.

Redevelopment of vacant and foreclosed properties will be by private developers or by a City of Lauderhill-affiliated entity such as the Redevelopment Authority or the Housing Authority for sale for affordable homeownership. In regard to private developers, the City will issue a "Request for Qualifications" to solicit proposals from developers with a proven track record of acquiring, redeveloping and marketing single family homes for homeownership. Single family and multifamily housing units assisted under this activity will have a recorded mortgage and Land Use Restriction Agreement on the properties.

Program income received from the sale or rental of assisted units will be recycled for eligible NSP activities. The City will allow and pay for development fees and other soft/project related costs that are fair and reasonable as part of the acquisition and rehabilitation process. If an abandoned or foreclosed-upon home or residential property is to be sold to an individual as a primary residence, no profit may be earned on such sale.

Each homebuyer will receive at least 8 hours of homebuyer counseling under the program through the City's network of local home buying counseling agencies.

(5) Location Description: This activity will be carried out in the target areas as referenced in Section A – Areas of Greatest Need. After analysis within the target area, specific properties will be evaluated. Factors may include elements such as block location, amount of rehabilitation, ownership, and other criteria affecting costs.

(6) Performance Measures e.g., units of housing to be acquired, rehabilitated, or demolished for the income levels of households that are 50 percent of area median income and below, 51-80 percent, and 81-120 percent).

The City of Lauderhill expects to assist 40 households that fall below 120% AMI of those 25% of total will benefit households that are 50% of AMI.

(7) Total Budget: \$3,863,960

(8) Responsible Organization: City of Lauderhill; 3800 Inverrary Boulevard; Suite 306; Lauderhill, FL 33319; Jane Sullivan, 954-730-3000; email: jsullivan@lauderhill-fl.gov

(9) Projected Start Date: March 1, 2009

(10) Projected End Date: February 28, 2013

(11) Specific Activity Requirements:

For acquisition activities, include:

- discount rate

For financing activities, include:

- range of interest rates

For housing related activities, include:

- duration or term of assistance;
- tenure of beneficiaries--rental or homeownership;
- a description of how the design of the activity will ensure continued affordability

Acquisition

The homes will be purchased from banks at a discount of at least 5% (less than the current market appraised value) for individual properties and 15% for bulk or aggregate purchases of property.

Housing Activities

The NSP program will rehabilitate or redevelop both single family and multi-family residential properties. Costs of the rehabilitation can include labor, materials, supplies, permits, lead paint assessment, abatement and clearance, barrier removal, energy efficient measures asbestos removal and program delivery. Rehabilitation projects involving one or more units in a multi-unit building owned as a condominium, will be limited to the particular unit(s) and will not involve rehabilitation of portions of the property that are held in common ownership.

Housing units acquired through the use of NSP funds will require rehabilitation in most cases. The City will provide NSP funds for housing rehabilitation to bring the housing units up to the City's Minimum Housing Code. If the cost to rehabilitate the unit is greater than fifty percent (50%) of the acquisition price, and/or the cost of acquisition and rehabilitation exceeds one hundred percent (100%) loan-to-value, the City will pay for the evaluation the property to determine if demolition is an option.

The City may provide other incentives for Housing Partners to assist special needs populations, which may include the homeless, disabled, victims of domestic violence, and others.

The City will provide incentives for improving energy efficiency, conservation, or providing renewable energy source(s). These types of features will provide for long-term affordability and increased sustainability.

The City will allow and pay for development fees that are fair and reasonable as part of the acquisition and rehabilitation process.

For both rental and homeownership programs utilizing NSP funds, the City of Lauderhill will utilize mortgages and restrictive covenants to ensure continued affordability of NSP assisted housing.

CERTIFICATIONS

(1) **Affirmatively furthering fair housing.** The jurisdiction will affirmatively further fair housing, which means that it will conduct an analysis to identify impediments to fair housing choice within the jurisdiction, take appropriate actions to overcome the effects of any impediments identified through that analysis, and maintain records reflecting the analysis and actions in this regard.

(2) **Anti-lobbying.** The jurisdiction will comply with restrictions on lobbying required by 24 CFR part 87, together with disclosure forms, if required by that part.

(3) **Authority of Jurisdiction.** The jurisdiction possesses the legal authority to carry out the programs for which it is seeking funding, in accordance with applicable HUD regulations and other program requirements.

(4) **Consistency with Plan.** The housing activities to be undertaken with NSP funds are consistent with its consolidated plan, which means that NSP funds will be used to meet the congressionally identified needs of abandoned and foreclosed homes in the targeted area set forth in the grantee's substantial amendment.

(5) **Acquisition and relocation.** The jurisdiction will comply with the acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended (42 U.S.C. 4601), and implementing regulations at 49 CFR part 24, except as those provisions are modified by the Notice for the NSP program published by HUD.

(6) **Section 3.** The jurisdiction will comply with section 3 of the Housing and Urban Development Act of 1968 (12 U.S.C. 1701u), and implementing regulations at 24 CFR part 135.

(7) **Citizen Participation.** The jurisdiction is in full compliance and following a detailed citizen participation plan that satisfies the requirements of Sections 24 CFR 91.105 or 91.115, as modified by NSP requirements.

(8) **Following Plan.** The jurisdiction is following a current consolidated plan (or Comprehensive Housing Affordability Strategy) that has been approved by HUD.

(9) **Use of funds in 18 months.** The jurisdiction will comply with Title III of Division B of the Housing and Economic Recovery Act of 2008 by using, as defined in the NSP Notice, all of its grant funds within 18 months of receipt of the grant.

(10) **Use NSP funds \leq 120 of AMI.** The jurisdiction will comply with the requirement that all of the NSP funds made available to it will be used with respect to individuals and families whose incomes do not exceed 120 percent of area median income.

(11) **Assessments.** The jurisdiction will not attempt to recover any capital costs of public improvements assisted with CDBG funds, including Section 108 loan guaranteed funds, by

assessing any amount against properties owned and occupied by persons of low- and moderate-income, including any fee charged or assessment made as a condition of obtaining access to such public improvements. However, if NSP funds are used to pay the proportion of a fee or assessment attributable to the capital costs of public improvements (assisted in part with NSP funds) financed from other revenue sources, an assessment or charge may be made against the property with respect to the public improvements financed by a source other than CDBG funds. In addition, with respect to properties owned and occupied by moderate-income (but not low-income) families, an assessment or charge may be made against the property with respect to the public improvements financed by a source other than NSP funds if the jurisdiction certifies that it lacks NSP or CDBG funds to cover the assessment.

(12) **Excessive Force.** The jurisdiction certifies that it has adopted and is enforcing: (1) a policy prohibiting the use of excessive force by law enforcement agencies within its jurisdiction against any individuals engaged in non-violent civil rights demonstrations; and (2) a policy of enforcing applicable State and local laws against physically barring entrance to or exit from, a facility or location that is the subject of such non-violent civil rights demonstrations within its jurisdiction.

(13) **Compliance with anti-discrimination laws.** The NSP grant will be conducted and administered in conformity with title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000d), the Fair Housing Act (42 U.S.C. 3601-3619), and implementing regulations.

(14) **Compliance with lead-based paint procedures.** The activities concerning lead-based paint will comply with the requirements of part 35, subparts A, B, J, K, and R of this title.

(15) **Compliance with laws.** The jurisdiction will comply with applicable laws.

Charles Faranda
Signature/Authorized Official

November 26, 2008

Date

City Manager

Title

NSP Substantial Amendment Checklist

For the purposes of expediting review, HUD asks that applicants submit the following checklist along with the NSP Substantial Amendment and SF-424.

Contents of an NSP Action Plan Substantial Amendment

Jurisdiction(s): <u>City of Lauderhill</u> Lead Agency City of Lauderhill Jurisdiction Web Address: www.lauderhill-fl.gov (URL where NSP Substantial Amendment materials are posted)	NSP Contact Person: Jane Sullivan Address: 3800 Inverrary Blvd; Suite 306 Telephone: 954-730-3000 Fax: 954-730-3025 Email: jsullivan@lauderdale-fl.gov
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The elements in the substantial amendment required for the Neighborhood Stabilization Program are:

A. AREAS OF GREATEST NEED

Does the submission include summary needs data identifying the geographic areas of greatest need in the grantee’s jurisdiction?

Yes No . Verification found on page 3.

B. DISTRIBUTION AND USES OF FUNDS

Does the submission contain a narrative describing how the distribution and uses of the grantee’s NSP funds will meet the requirements of Section 2301(c)(2) of HERA that funds be distributed to the areas of greatest need, including those with the greatest percentage of home foreclosures, with the highest percentage of homes financed by a subprime mortgage related loan, and identified by the grantee as likely to face a significant rise in the rate of home foreclosures?

Yes No . Verification found on page 3.

Note: The grantee’s narrative must address the three stipulated need categories in the NSP statute, but the grantee may also consider other need categories.

C. DEFINITIONS AND DESCRIPTIONS

For the purposes of the NSP, do the narratives include:

- a definition of “blighted structure” in the context of state or local law,
 Yes No . Verification found on page 4.
- a definition of “affordable rents,”
 Yes No . Verification found on page 4.
- a description of how the grantee will ensure continued affordability for NSP assisted housing,
 Yes No . Verification found on page 5.

- a description of housing rehabilitation standards that will apply to NSP assisted activities?

Yes No . Verification found on page 5.

D. LOW INCOME TARGETING

- Has the grantee described how it will meet the statutory requirement that at least 25% of funds must be used to purchase and redevelop abandoned or foreclosed upon homes or residential properties for housing individuals and families whose incomes do not exceed 50% of area median income?

Yes No . Verification found on page 5 & 9.

- Has the grantee identified how the estimated amount of funds appropriated or otherwise made available will be used to purchase and redevelop abandoned or foreclosed upon homes or residential properties for housing individuals or families whose incomes do not exceed 50% of area median income?

Yes No . Verification found on page 5.
Amount budgeted = \$ 1,073,322.

E. ACQUISITIONS & RELOCATION

Does grantee plan to demolish or convert any low- and moderate-income dwelling units?

Yes No . (If no, continue to next heading)
Verification found on page 6.

If so, does the substantial amendment include:

- The number of low- and moderate-income dwelling units—i.e., ≤ 80% of area median income—reasonably expected to be demolished or converted as a direct result of NSP-assisted activities?
Yes No . Verification found on page _____.
- The number of NSP affordable housing units made available to low-, moderate-, and middle-income households—i.e., ≤ 120% of area median income—reasonably expected to be produced by activity and income level as provided for in DRGR, by each NSP activity providing such housing (including a proposed time schedule for commencement and completion)?
Yes No . Verification found on page _____.
- The number of dwelling units reasonably expected to be made available for households whose income does not exceed 50 percent of area median income?
Yes No . Verification found on page _____.

F. PUBLIC COMMENT PERIOD

Was the proposed action plan amendment published via the grantee jurisdiction's usual methods and on the Internet for no less than 15 calendar days of public comment?

Yes No . Verification found on page 6.

Is there a summary of citizen comments included in the final amendment?

Yes No Verification found on page 6.

G. INFORMATION BY ACTIVITY

Does the submission contain information by activity describing how the grantee will use the funds, identifying:

- eligible use of funds under NSP,
Yes No Verification found on page 7 & 8.
- correlated eligible activity under CDBG,
Yes No Verification found on page 7 & 8.
- the areas of greatest need addressed by the activity or activities,
Yes No Verification found on page 7 & 8.
- expected benefit to income-qualified persons or households or areas,
Yes No Verification found on page 7 & 8.
- does the applicant indicate which activities will count toward the statutory requirement that at least 25% of funds must be used to purchase and redevelop abandoned or foreclosed upon homes or residential properties for housing individuals and families whose incomes do not exceed 50% of area median income?
Yes No Verification found on page 9.
- appropriate performance measures for the activity,
Yes No Verification found on page 7 & 8.
- amount of funds budgeted for the activity,
Yes No Verification found on page 7 & 8.
- the name, location and contact information for the entity that will carry out the activity,
Yes No Verification found on page 7 & 8.
- expected start and end dates of the activity?
Yes No Verification found on page 7 & 8.
- If the activity includes acquisition of real property, the discount required for acquisition of foreclosed upon properties,
Yes No Verification found on page 9.
- If the activity provides financing, the range of interest rates (if any),
Yes No Verification found on page .

- If the activity provides housing, duration or term of assistance,
Yes No . Verification found on page 9.
- tenure of beneficiaries (e.g., rental or homeownership),
Yes No . Verification found on page 9.
- does it ensure continued affordability?
Yes No . Verification found on page 10.

H. CERTIFICATIONS

The following certifications are complete and accurate:

- | | | |
|--|---|-----------------------------|
| (1) Affirmatively furthering fair housing | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/> |
| (2) Anti-lobbying | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/> |
| (3) Authority of Jurisdiction | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/> |
| (4) Consistency with Plan | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/> |
| (5) Acquisition and relocation | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/> |
| (6) Section 3 | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/> |
| (7) Citizen Participation | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/> |
| (8) Following Plan | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/> |
| (9) Use of funds in 18 months | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/> |
| (10) Use NSP funds \leq 120 of AMI | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/> |
| (11) No recovery of capital costs thru special assessments | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/> |
| (12) Excessive Force | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/> |
| (13) Compliance with anti-discrimination laws | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/> |
| (14) Compliance with lead-based paint procedures | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/> |
| (15) Compliance with laws | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/> |

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Estimated Foreclosure Abandonment Risk Score Lauderhill, FL

