



DRAFT State of Maine Consolidated Plan

CDBG, ESG, HOME, HTF

Plan Years 2025-2029

Prepared by
Maine State Housing Authority
Maine Department of Economic and Community Development
November 2024



mainehousing.org | 207-626-4600

Contents

Executive Summary.....	1
ES-05 Executive Summary - 91.300(c), 91.320(b)	1
The Process	5
PR-05 Lead & Responsible Agencies 24 CFR 91.300(b)	5
PR-10 Consultation – 91.100, 91.110, 91.200(b), 91.300(b), 91.200(I) and 91.315(l).....	6
PR-15 Citizen Participation – 91.105, 91.115, 91.200(c) and 91.300(c).....	13
Needs Assessment	17
NA-05 Overview.....	17
NA-10 Housing Needs Assessment - 24 CFR 91.305 (a,b,c).....	18
NA-15 Disproportionately Greater Need: Housing Problems - 91.305 (b)(2)	26
NA-20 Disproportionately Greater Need: Severe Housing Problems – 91.305(b)(2)	29
NA-25 Disproportionately Greater Need: Housing Cost Burdens – 91.305 (b)(2)	33
NA-30 Disproportionately Greater Need: Discussion – 91.305 (b)(2).....	34
NA-35 Public Housing – (Optional).....	35
NA-40 Homeless Needs Assessment – 91.305(c)	39
NA-45 Non-Homeless Special Needs Assessment – 91.305 (b,d).....	42
NA-50 Non-Housing Community Development Needs - 91.315 (f).....	44
Housing Market Analysis.....	46
MA-05 Overview	46
MA-10 Number of Housing Units – 91.310(a)	47
MA-15 Cost of Housing – 91.310(a).....	50
MA-20 Condition of Housing – 91.310(a)	57
MA-25 Public and Assisted Housing – (Optional)	60

MA-30 Homeless Facilities – 91.310(b)	61
MA-35 Special Needs Facilities and Services – 91.310(c)	64
MA-40 Barriers to Affordable Housing – 91.310(d).....	67
MA-45 Non-Housing Community Development Assets -91.315(f)	68
MA-50 Needs and Market Analysis Discussion	74
MA-60 Broadband Needs of Housing occupied by Low- and Moderate-Income Households - 91.210(a)(4), 91.310(a)(2)	76
MA-65 Hazard Mitigation - 91.210(a)(5), 91.310(a)(3)	78
Strategic Plan	79
SP-05 Overview	79
SP-10 Geographic Priorities – 91.315(a)(1).....	80
SP-25 Priority Needs – 91.315(a)(2).....	82
SP-30 Influence of Market Conditions – 91.315(b).....	86
SP-50 Public Housing Accessibility and Involvement – 91.315(c).....	100
SP-55 Barriers to affordable housing – 91.315(h)	101
SP-60 Homelessness Strategy – 91.315(d).....	103
SP-65 Lead based paint Hazards – 91.315(i)	107
SP-70 Anti-Poverty Strategy – 91.315(j).....	108
SP-80 Monitoring – 91.330.....	109
Expected Resources	110
AP-15 Expected Resources – 91.320(c)(1,2)	110
Annual Goals and Objectives	114
AP-25 Allocation Priorities – 91.320(d)	118
AP-30 Methods of Distribution – 91.320(d)&(k).....	120
AP-35 Projects – (Optional).....	132
AP-38 Project Summary	133

AP-40 Section 108 Loan Guarantee – 91.320(k)(1)(ii).....	136
AP-45 Community Revitalization Strategies – 91.320(k)(1)(ii).....	137
AP-50 Geographic Distribution – 91.320(f).....	138
Affordable Housing	139
AP-55 Affordable Housing – 24 CFR 91.320(g)	139
AP-60 Public Housing - 24 CFR 91.320(j)	140
AP-65 Homeless and Other Special Needs Activities – 91.320(h).....	141
AP-75 Barriers to affordable housing – 91.320(i).....	144
AP-85 Other Actions – 91.320(j).....	146
Program Specific Requirements.....	149
Citizen Participation Comments.....	163
Grantee Unique Appendices	167

DRAFT

Executive Summary

ES-05 Executive Summary - 91.300(c), 91.320(b)

1. Introduction

The FY 2025 -2029 State of Maine Consolidated Plan is a comprehensive planning document identifying the State's needs in housing and community development. The U. S. Department of Housing and Urban Development (HUD) requires the State to complete a Consolidated Plan to receive federal funds for the application and use of four (4) formula grant programs:

Community Development Block Grant (CDBG);

Emergency Solutions Grant (ESG);

HOME Investment Partnerships (HOME);

and the Housing Trust Fund (HTF).

The Consolidated Plan identifies the State's housing and community development needs and specifies how block grant funds will be used to address those needs.

This document includes the Year 2025 Action Plan, detailing how Department of Economic and Community Development (DECD) and Maine State Housing Authority (MaineHousing) plan to allocate HUD grant funds during the 2025 program year, which runs from January 1, 2025 to December 31, 2025.

DECD will administer the CDBG program. MaineHousing will administer the ESG, HOME, and HTF programs.

MaineHousing and the DECD look forward to continued coordination of programs and will involve other partners to leverage resources.

2. Summary of the objectives and outcomes identified in the Plan Needs Assessment Overview

The federal statutes for the four grant programs covered by the Consolidated Planning rule (CDBG, ESG, HOME, and HTF) include a number of basic goals discussed in the Housing and Community Development Act, as amended, and the National Affordable Housing Act, as amended, which relate to major commitments and priorities of HUD. The Consolidated Plan furthers the goals of the programs by providing decent affordable housing, establishing and maintaining a suitable living environment, and expanding economic opportunities for individuals/families in Maine, particularly for low- and very-low-income persons. These goals are incorporated in the State of Maine Consolidated Plan.

The three overarching objectives guiding proposed activities within this plan are to:

- Provide decent affordable housing
- Create suitable living environments
- Create economic opportunities

Programs and activities are designed to benefit a community or the people served. The benefits, or program outcomes, for each activity funded by the four federal programs are expected to be:

- Improved availability/accessibility
- Improved affordability
- Improved sustainability

All future activities funded in the next five years will support at least one objective and one outcome. The framework for realizing these objectives and outcomes include the following priorities:

- Improve and Preserve the Quality of Housing
- Expand Affordable Housing Opportunities
- Help Maine People Attain Housing Stability
- Improve Economic Opportunity
- Improve Public Infrastructure

To achieve these goals, the State will use a combination of federal and state funds and other public and private funds to address priority housing and community development needs.

In 2025, the State proposes to allocate funding to the following activities.

CDBG:

- See attached CDBG Program Statement

HOME:

- \$2.4 million for rental housing
- \$1.4 million for tenant based rental assistance

ESG:

- \$643,708 for emergency shelter operations and essential services
- \$643,708 for rapid rehousing

HTF:

- \$3 million for rental housing

This funding will result in:

- sheltering 5000 homeless individuals
- rapid rehousing for 2900 homeless individuals
- 80 new housing units
- 100 rental units rehabilitated
- 200 homeowner housing units rehabilitated
- 1500 persons assisted by a public facility or infrastructure activity
- 30 jobs created or retained
- 100 businesses assisted

3. Evaluation of past performance

The State's evaluation of its past performance has been completed in a thorough Consolidated Annual Performance and Evaluation Report (CAPER). This document states the objectives and expected outcomes identified in the Consolidated Plan and includes an evaluation of past performance compared to measurable goals and objectives. The CAPER can be found on the MaineHousing website.

It is important to note that the State provides affordable housing and community development through a variety of assistance programs, many of which are funded through agency resources or state appropriations. In 2023 MaineHousing assisted 820 first time home buyers, 20,826 rental households, over 44,000 household were helped with energy assistance, and 6,143 homeless individuals. MaineHousing used funds to complete 751 multifamily units, with another 796 multifamily units financed and under construction.

While production results have sometimes exceeded or fallen short of stated goals, significant progress has been made to address the Consolidated Plan priorities and objectives. Several priorities exceeded 2019-2024 Consolidated Plan goals, including use of tenant-based rental assistance, improved public infrastructure, rental units rehabilitated with HTF and CDBG, and improved economic opportunities.

4. Summary of citizen participation process and consultation process

MaineHousing and DECD followed the State's Citizen Participation Plan and reached out to local, regional and state organizations, the CoC and other interested parties. The public consultation process for this plan included over 6 public forums, a housing survey and a fair housing survey. The forums focused on topics including Homelessness, CDBG, Public Housing and multifamily housing. Forums occurred both in person and virtually from June to August 2024, and a forum was included in the August 2024 Maine Affordable Housing Coalition meeting. In addition, consultation was sought during the June 2024 Continuum of Care and Statewide Homeless Council meetings. These meetings were held prior to the drafting of the Consolidated Plan.

Notice of the forums was placed on the MaineHousing website, and stakeholder groups were notified of the forums via email. The MaineHousing email list includes community leaders, developers, CHDOs, local housing authorities, advocacy groups, not-for-profit organizations, providers of housing and services to the

homeless, CoC members, and interested individuals. The forums were also announced via social media with postings on the MaineHousing Facebook site.

On August 8, 2024 a public hearing occurred to allow citizens the opportunity to provide input into the 2025-2029 Maine Consolidated Plan. Public hearing notices were placed on the MaineHousing website. In addition, the public hearing was announced in state newspapers two weeks before the meeting was held. A total of ten participants attended the public hearing in the state capitol of Augusta; no public comments were offered.

5. Summary of public comments

Input received during the forums was used during the drafting of the Consolidated Plan.

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

N/A

7. Summary

Activities funded in 2025-2029 will address one of the following goals:

- Improve and Preserve the Quality of Housing
- Expand Affordable Housing Opportunities
- Help Maine People Attain Housing Stability
- Improve Economic Opportunity
- Improve Public Infrastructure

MaineHousing and DECD followed the State's Citizen Participation Plan for public consultation in the preparation of this plan.

The format of this Plan is mandated by HUD. HUD has provided an online template for grantees as part of its planning and reporting system called IDIS. The questions in bold and many of the tables are created automatically by IDIS. After the Plan is approved by HUD, results of plan goals will be reported each year in the Consolidated Annual Performance Evaluation Report (CAPER), another on-line document which will be produced in IDIS.

The Process

PR-05 Lead & Responsible Agencies 24 CFR 91.300(b)

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

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	MAINE	MaineHousing
CDBG Administrator	MAINE	Department of Economic & Community Development
HOME Administrator	MAINE	MaineHousing
ESG Administrator	MAINE	MaineHousing
HTF Administrator	MAINE	MaineHousing

Table 1 – Responsible Agencies

Narrative

The Consolidated Plan was developed in partnership between the Maine Department of Economic and Community Development (DECD) and the Maine State Housing Authority (MaineHousing). MaineHousing has been designated the lead agency for overseeing the development of the Consolidated Plan.

MaineHousing is also the Collaborative Applicant for the Maine Continuum of Care (CoC) and the HMIS lead agency.

Consolidated Plan Public Contact Information

MaineHousing has been designated as the lead agency and primary point of public contact on the Consolidated Plan and the subsequent Annual Action Plans. The 2025-2029 Consolidated Plan can be viewed and downloaded on the MaineHousing website. Please direct your comments to:

Compliance Office II

Maine State Housing Authority

26 Edison Drive, Augusta, Maine 04330

Telephone 207-626-4600

PublicComment@MaineHousing.org

PR-10 Consultation – 91.100, 91.110, 91.200(b), 91.300(b), 91.200(I) and 91.315(I)

1. Introduction

The Consolidated Plan reflects consultation with many agencies, organizations and private citizens of the State of Maine. These groups and individuals represent a variety of housing and community development programs and concerns. Other entities consulted include state and local governments, not-for-profit organizations, local public housing authorities, representatives of the private sector, social services providers, housing providers, emergency management agencies, and the Continuums of Care among others. MaineHousing and DECD conducted an extensive public participation process to assess the needs of the state. That process included statewide meetings, forums, surveys and a public hearing, with notice to interested parties.

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 (91.215(I))

MaineHousing and DECD work closely to ensure that housing providers, private organizations, State and local governmental agencies, service providers, as well as the general public, are consulted during the development of the Consolidated Plan. Participation is encouraged through mailings to targeted individuals and agencies, website postings, and newspaper notices across the state. Public input is received and accepted in the form of telephone consultations, emails, social media comments, and testimonies at meetings and hearings.

MaineHousing in partnership with the CoC and the Statewide Homeless Council work toward a shared goal of preventing and eliminating homelessness in Maine.

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

The Maine Continuum of Care (MCoC) includes representatives of from non-profits, local and state agencies, healthcare providers, homeless service hub coordinators and other entities focused on initiatives and services for chronically homeless individual and families, families with children, veterans and unaccompanied youth, as well as persons at risk of homelessness. MaineHousing provides staffing support and leadership to the MCoC as the Collaborative Applicant for the Maine Continuum of Care, the HMIS Lead Agency for the State of Maine, and the Coordinated Entry Management Entity for the MCoC. The MCoC general membership and MCoC Board meet monthly. Committees of the MCoC meet monthly to hone in on specific aspects of the system and action items. Topics such as accessing HUD CoC funding, allocation of program resources, coordinated entry, performance measurement, and HMIS are discussed at the monthly meetings. The MCoC, through the Homeless Service Hub system, work toward quality data in each area of the state in an effort to understand the size and scope of homelessness in Maine that will lend itself to data driven programs and solutions.

Describe consultation with the Continuum(s) of Care that serves the state in determining how to allocate ESG funds, develop performance standards and evaluate outcomes, and develop funding, policies and procedures for the administration of HMIS

Allocation of ESG for the State of Maine is detailed in the Homeless Solutions Rule which is posted on the MaineHousing website (<https://www.mainehousing.org/docs/default-source/msha-rules/19--homeless-solutions-rule.pdf>). In 2024, MaineHousing initiated a review of the rule to incorporate feedback from the MCoC and ESG Grantees. MaineHousing convened a group of representatives from 27 of the 30 grantees and conducted 2 meetings to draft a revision to the rule, which should become effective in October 2024. The draft rule was also presented to the MCoC Board for feedback before initiation of the public hearing/comments process. ESG subrecipients and CoC membership are involved in the Annual Action Plan process each year through meeting consultation and public comment on goals for the coming year pertaining to ESG funding. Additionally, the criteria for receiving ESG funding requires that applicants be regular and active participants of the MCoC. This requirement helps ensure that the ESG awardees have a venue to regularly provide feedback to MaineHousing.

MaineHousing and the MCoC, through the Homeless Solutions Rule, have developed performance standards. Shelter funding is tied to successfully meeting the standards. The MCoC Board and general membership review performance data for ESG funded agencies, as well as the full system, at each monthly meeting. The group utilizes the data to evaluate performance of the system and to suggest enhancements to the performance data provided by MaineHousing as the Collaborative Applicant and HMIS Lead.

In collaboration with the MCoC, HMIS Policies and Procedures are updated annually and at times when significant changes are needed. Additionally, in 2024, the CoC voted to complete an RFP process for the HMIS vendor contract. The Data Committee of the CoC meets monthly to discuss HMIS and data priorities as they relate to policies and procedures. The CoC scores and ranks project applications during each annual CoC NOFO, which includes funding for HMIS software and administration.

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

Table 2 – Agencies, groups, organizations who participated

1	Agency/Group/Organization	MAINE STATE HOUSING AUTHORITY
	Agency/Group/Organization Type	Housing
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Lead-based Paint Strategy Public Housing Needs Homelessness Strategy Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Non-Homeless Special Needs Market Analysis Anti-poverty Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	
2	Agency/Group/Organization	Maine Statewide Homeless Council
	Agency/Group/Organization Type	Housing Services - Housing Services-Children Services-Elderly Persons Services-Persons with Disabilities Services-Persons with HIV/AIDS Services-Victims of Domestic Violence Services-homeless Services-Health Services-Education Services-Employment Service-Fair Housing Services - Victims Health Agency Child Welfare Agency Publicly Funded Institution/System of Care Other government - State
	What section of the Plan was addressed by Consultation?	Homelessness Strategy Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth

	<p>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</p> <p>The Statewide Homeless Council along with the three Regional Councils meet regularly to discuss needs and issues. MaineHousing solicited their input on the allocation of funding. They are notified of plan development, public hearings and comment periods.</p>
3	<p>Agency/Group/Organization</p> <p>Maine Continuum of Care</p>
	<p>Agency/Group/Organization Type</p> <p>Housing Services - Housing Services-Children Services-Elderly Persons Services-Persons with Disabilities Services-Persons with HIV/AIDS Services-Victims of Domestic Violence Services-homeless Services-Health Services-Education Services-Employment Service-Fair Housing Services - Victims Health Agency Child Welfare Agency Publicly Funded Institution/System of Care Other government - State Other government - Local</p>
	<p>What section of the Plan was addressed by Consultation?</p> <p>Homelessness Strategy Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth</p>
	<p>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</p> <p>The Maine Continuum of Care meets regularly to discuss needs and issues. MaineHousing solicited input on the allocation of funding. The Continuum of Care is notified of plan development, public hearings and comment periods.</p>

4	Agency/Group/Organization	Maine Affordable Housing Coalition
	Agency/Group/Organization Type	Housing PHA Services - Housing Other government - State Other government - County Other government - Local Regional organization Business Leaders Civic Leaders Business and Civic Leaders
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Public Housing Needs Non-Homeless Special Needs Market Analysis
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	The Maine Affordable Housing Coalition (MAHC) is a diverse coalition of more than 130 private and public sector organizations, including developers, architects, engineers, builders, investors, Community Action agencies, public housing authorities, housing and service providers, advocates and others committed to ensuring that all Mainers are adequately and affordably housed. MaineHousing actively participates in the organization. MAHC is notified of plan development, public hearings, and comment periods.

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

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	MaineHousing	The Continuum of Care goals have been recognized in the Consolidated Plan.
Analysis of Impediments to Fair Housing Choice	MaineHousing	The Analysis of Impediments to Fair Housing Choice was updated in conjunction with the Consolidated Plan to identify impediments to fair housing choice and actions to address those impediments.
Qualified Allocation Plan	MaineHousing	The Qualified Allocation Plan recognizes the needs and priorities identified in the Consolidated Plan.

Table 3 – Other local / regional / federal planning efforts

Describe cooperation and coordination among the State and any units of general local government, in the implementation of the Consolidated Plan (91.315(l))

Maine’s Consolidated Plan relies on cooperation and coordination with state, local and regional governments. Representatives of local government participated in many of the public forums.

Narrative (optional):

MaineHousing works directly with the PHAs, service providers, DHHS, the Community Action Agencies, the Statewide Homeless Coalition, and the Maine Affordable Housing Coalition to ensure that all partners are aware of MaineHousing funding programs and that programs and services from the various players can be used together for mutual benefit to the extent possible.

DRAFT

MaineHousing’s Development Department has partnered with the Genesis Fund to provide technical assistance to potential development partners. They have the local knowledge of developers and contractors, as well as service providers, and are able to assist in the creation of partnerships. Additionally, they can offer or have knowledge of other financial resources available to developers. The Genesis Fund has held informational sessions (often attended by MaineHousing as well) in many different geographic locations around the state to ensure interested parties have access to local sessions.

DRAFT

PR-15 Citizen Participation – 91.105, 91.115, 91.200(c) and 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

MaineHousing and DECD followed the State's Citizen Participation Plan and reached out to local, regional and state organizations, the CoC and other interested parties. The public consultation process for this plan included over 6 public forums, a housing survey and a fair housing survey. The forums focused on topics including Homelessness, CDBG, Public Housing and multifamily housing. Forums occurred both in person and virtually from June to August 2024, and a forum was included in the August 2024 Maine Affordable Housing Coalition meeting. In addition, consultation was sought during the June 2024 Continuum of Care and Statewide Homeless Council meetings. These meetings were held prior to the drafting of the Consolidated Plan.

Notice of the forums was placed on the MaineHousing website, and stakeholder groups were notified of the forums via email. The MaineHousing email list includes community leaders, developers, CHDOs, local housing authorities, advocacy groups, not-for-profit organizations, providers of housing and services to the homeless, CoC members, and interested individuals. The forums were also announced via social media with postings on the MaineHousing Facebook site.

On August 8, 2024 a public hearing occurred to allow citizens the opportunity to provide input into the 2025-2029 Maine Consolidated Plan. Public hearing notices were placed on the MaineHousing website. In addition, the public hearing was announced in state newspapers two weeks before the meeting was held. A total of ten participants attended the public hearing in the state capitol of Augusta; no public comments were offered.

Citizen Participation Outreach

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
1	Public Meeting	Non-targeted/broad community Statewide Homeless Council	Discussion of housing issues occurred on June 11, 2024, Eighteen people attended. Discussion of critical affordable housing needs and barriers.	Summary Attached	None	
2	Fair Housing Survey	Non-targeted/broad community	97 Responses to June 2024 survey	Summary Attached	None	
3	Public Meeting	CoC	Discussion of housing issues occurred on June 20, 2024, Forty people attended. Discussion of critical affordable housing needs and barriers.	Summary Attached	None	

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
4	Public Meeting	CDBG Public Forum	Meeting held June 28, 2024. Forty people in attendance positive response on direction of the program. People approve of adapting the Method of Distribution to changing local capacity and critical community needs.	See above. No specific comments	None	
5	Public Meeting	Maine Public Housing Directors	Discussion of critical housing issues occurred on July 26, 2024	Summary Attached	None	
6	Public Meeting	Maine Affordable Housing Coalition	Discussion of housing issues occurred on August 6, 2024	Summary Attached	None	
7	Fair Housing Survey	Non-targeted/broad community	61 responses to June 2024 survey.	Summary Attached	None	
8	Public Hearing	Non-targeted/broad community	A Public Hearing held in Augusta on August 8, 2024. Ten people were in attendance.	No Public Comments Received	None	
9	Public Meeting	People with Lived Experience	Discussion of housing issues occurred on June 28, 2024, Five people attended.	Summary Attached	None	

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
10	Newspaper Ad	Non-targeted/broad community	Notice of the August 8, 2024 public hearing was published in the Kennebec Journal, Portland Press Herald, and the Bangor Daily News on July 12, 2024.	None	None	

Table 4 – Citizen Participation Outreach

DRAFT

Needs Assessment

NA-05 Overview

Needs Assessment Overview

Definitions

For the purposes of this assessment, we define the following terms and acronyms:

- AMI – area median income
- HUD – US Department of Housing and Urban Development
- Low-Income Household – a household with total income below 80% of the local AMI
- Very Low-Income Household – a household with total income below 50% of the local AMI
- Extremely Low-Income Household – a household with total income below 30% of the local AMI
- (Housing) Cost Burden – a household is considered cost burdened if they spend more than 30% of gross household income on housing costs, including property taxes, insurance, and standard utilities.
- Severe (Housing) Cost Burden - a household is considered severely cost burdened if they spend more than 50% of gross household income on housing costs, including property taxes, insurance, and standard utilities.

NA-10 Housing Needs Assessment - 24 CFR 91.305 (a,b,c)

Summary of Housing Needs

Maine's housing needs arise from a historical slowdown of housing production, especially following the 2008 financial crisis, compounded by an aging population and a housing stock that is among the oldest in the nation. This has contributed to increasing housing costs that make housing cost burden by far the most common housing problem among both renters and homeowners.

Demographics	Base Year: 2010	Most Recent Year: 2022	% Change
Population	1,327,665	1,366,949	3%
Households	551,125	580,172	5%
Median Income	\$46,933.00	\$68,251.00	45%

Table 5 - Housing Needs Assessment Demographics

Alternate Data Source Name:

ACS 2018-2022

Data Source Comments:

Number of Households Table

	0-30% HAMFI	>30-50% HAMFI	>50-80% HAMFI	>80-100% HAMFI	>100% HAMFI
Total Households	72,630	72,015	105,160	64,910	254,835
Small Family Households	13,730	16,695	31,370	23,465	130,960
Large Family Households	1,705	2,825	5,285	3,725	13,675
Household contains at least one person 62-74 years of age	17,915	20,510	28,730	18,505	68,805
Household contains at least one person age 75 or older	14,905	17,865	17,285	7,225	19,740
Households with one or more children 6 years old or younger	6,275	6,705	13,070	7,900	31,365

Table 6 - Total Households Table

Alternate Data Source Name:

CHAS 2016-2020

Data Source Comments:

Housing Needs Summary Tables

1. Housing Problems (Households with one of the listed needs)

	Renter					Owner				
	0-30% AMI	>30- 50% AMI	>50- 80% AMI	>80- 100% AMI	Total	0-30% AMI	>30- 50% AMI	>50- 80% AMI	>80- 100% AMI	Total
NUMBER OF HOUSEHOLDS										
Substandard Housing - Lacking complete plumbing or kitchen facilities	1,655	920	590	130	3,295	980	515	420	239	2,154
Severely Overcrowded - With >1.51 people per room (and complete kitchen and plumbing)	425	465	235	130	1,255	100	100	185	125	510
Overcrowded - With 1.01-1.5 people per room (and none of the above problems)	805	405	815	170	2,195	90	310	810	470	1,680
Housing cost burden greater than 50% of income (and none of the above problems)	19,220	5,210	1,030	95	25,555	16,105	8,985	5,110	1,110	31,310
Housing cost burden greater than 30% of income (and none of the above problems)	6,335	14,185	9,775	1,160	31,455	6,800	11,620	16,740	6,755	41,915

	Renter					Owner				
	0-30% AMI	>30- 50% AMI	>50- 80% AMI	>80- 100% AMI	Total	0-30% AMI	>30- 50% AMI	>50- 80% AMI	>80- 100% AMI	Total
Zero/negative Income (and none of the above problems)	2,660	0	0	0	2,660	2,310	0	0	0	2,310

Table 7 – Housing Problems Table

Alternate Data Source Name:
CHAS 2016-2020
Data Source
Comments:

2. Housing Problems 2 (Households with one or more Severe Housing Problems: Lacks kitchen or complete plumbing, severe overcrowding, severe cost burden)

	Renter					Owner				
	0-30% AMI	>30- 50% AMI	>50- 80% AMI	>80- 100% AMI	Total	0-30% AMI	>30- 50% AMI	>50- 80% AMI	>80- 100% AMI	Total
NUMBER OF HOUSEHOLDS										
Having 1 or more of four housing problems	28,435	21,185	12,445	1,685	63,750	24,075	21,530	23,260	8,695	77,560
Having none of four housing problems	13,400	9,775	22,280	14,620	60,075	6,725	19,525	47,175	39,900	113,325
Household has negative income, but none of the other housing problems	2,660	0	0	0	2,660	2,310	0	0	0	2,310

Table 8 – Housing Problems 2

Alternate Data Source Name:
CHAS 2016-2020
Data Source
Comments:

3. Cost Burden > 30%

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
NUMBER OF HOUSEHOLDS								
Small Related	1,250	4,330	3,005	8,585	1,260	2,690	5,375	9,325
Large Related	180	800	105	1,085	95	570	920	1,585
Elderly	3,350	4,725	2,240	10,315	4,415	6,755	6,625	17,795
Other	2,015	5,055	4,730	11,800	1,215	1,805	4,050	7,070
Total need by income	6,795	14,910	10,080	31,785	6,985	11,820	16,970	35,775

Table 9 – Cost Burden > 30%

Alternate Data Source Name:
CHAS 2016-2020
Data Source
Comments:

4. Cost Burden > 50%

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
NUMBER OF HOUSEHOLDS								
Small Related	4,970	1,395	125	6,490	3,090	2,485	1,280	6,855
Large Related	835	60	4	899	360	355	140	855
Elderly	5,275	1,560	395	7,230	8,395	4,815	2,465	15,675
Other	9,610	2,335	540	12,485	4,720	1,470	1,265	7,455
Total need by income	20,690	5,350	1,064	27,104	16,565	9,125	5,150	30,840

Table 10 – Cost Burden > 50%

Alternate Data Source Name:
CHAS 2016-2020
Data Source
Comments:

5. Crowding (More than one person per room)

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
NUMBER OF HOUSEHOLDS										
Single family households	855	400	765	165	2,185	105	300	595	400	1,400
Multiple, unrelated family households	10	10	30	4	54	0	30	215	70	315

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
Other, non-family households	0	0	15	0	15	0	0	0	0	0
Total need by income	865	410	810	169	2,254	105	330	810	470	1,715

Table 11 – Crowding Information – 1/2

Alternate Data Source Name:

CHAS 2016-2020

Data Source

Comments:

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
Households with Children Present	4,325	3,745	5,660	13,730	1,950	2,960	7,410	12,320

Table 12 – Crowding Information – 2/2

Data Source

Comments:

Describe the number and type of single person households in need of housing assistance.

[Census data cited is from the 2023 ACS 1-year estimates.] Census records reflect 182,694 individuals living alone in Maine, representing 29% of the state’s population. (*Census Table DP02*). The median income for a one-person household in Maine is \$36,001 (*Census Table B19019*), which is less than half the amount of the state’s overall median income.

There are an estimated 82,408 single-person households over the age of 65, 33% male and 66% female (*Census Table B11010*). The remaining 100,286 single-person households are made up of individuals age 18 to 65, 51% male and 49% female.

Estimate the number and type of families in need of housing assistance who are disabled or victims of domestic violence, dating violence, sexual assault and stalking.

[Except as noted otherwise, census data cited is from the 2023 ACS 1-year estimates.]

Disability:

Almost 16% (217,651) of Maine’s civilian non-institutionalized population report experiencing at least one disability. The likelihood of reporting any form of disability varies by age: 10% among those aged 5 to 17, more than 13% for those aged 18 to 64, and almost 30% for those over 65 years of age. Within the population under 65 years of age, the most common categories of disability reported are cognitive difficulty,

ambulatory difficulty, and independent living difficulty, which is described as difficulty doing errands alone because of physical, mental, or emotional problems. For those over 65 years of age, the most common categories are ambulatory difficulty, hearing difficulty, and independent living difficulty (Census Table S1810, Disability Glossary). The percentage of males in Maine overall who experience disability is approximately half a percent higher than females. The racial or ethnic group with the highest rate of disability is “American Indian and Alaskan Native alone” residents, just under 20% of whom report a disability. (Census Table S1810). Over 28% of households receiving Food Stamps/SNAP within the past 12 months reported a disability (Census Table S2201).

Victims of domestic and dating violence, sexual assault, and stalking:

Of the total assaults reported to law enforcement in Maine in 2022, 30% were based on domestic violence (*Crime in Maine 2022*, Maine Dept. of Public Safety). In a survey of middle school children across the state, 19.7% report that violence at home, or the threat thereof, has affected them to the point of leaving the home for some period (*2021 Maine Integrated Youth Health Survey: Middle School Detailed Report*). A coalition of Maine domestic violence support partners recorded assisting 12,193 victims of abuse and violence in 2022; within that group, 42% of the instances involved a home with at least one child (*2022 Annual Report*, Maine Coalition to End Domestic Violence).

One key agency estimates that 19,000 Mainers experience sexual violence annually (*Maine Coalition Against Sexual Assault, 2022*). In a 2022 survey of asking 1,400 Maine residents about the previous one-year period, 17% reported having experienced a stalking crime (*ME DHHS 2022 Maine Crime Victimization Report, 2022*). A homelessness resource center report indicates, based on intake interviews, that 44% of the women queried had experienced sexual assault while homeless (Preble Street Resource Center, *Women and Homelessness*).

Victims of intimate partner violence, sexual assault, and stalking are housing-vulnerable in that their safety is already compromised. Although not every victim of intimate partner violence, sexual assault, or stalking requires housing assistance, all are at high risk of requiring housing assistance.

What are the most common housing problems?

Housing cost burden is the most common housing problem. Maine households, whether renters or homeowners, face considerable challenges due to rising costs. Statewide, 12.6% of households spend more than 30% of their gross household income on housing costs, and 9.8% spend more than 50% on housing (Census 2022 ACS 5-year estimates). Overcrowding is a very distant second place for most common housing problems in Maine, followed closely by living in substandard housing, which means the home lacks complete plumbing or kitchen facilities (.9%). (Ibid.)

Within the cost-burdened population, renters are most affected. While Maine’s median mortgage payment is higher at \$1,688 than the median rent of \$1,189 (Census Table DP04), higher incomes mean the income-to-cost ratio is much more favorable among those mortgage holders. More specifically, “the majority of renter households below 60% of Area Median Income (AMI) in Maine were cost burdened (paying over 30% of household income in rent)” while 20% of homeowners were cost burdened in 2021 (*State of Maine Housing Production Needs Study, 2023*, available at MaineHousing.org).

Are any populations/household types more affected than others by these problems?

Mostly, this appears to be income based. Low-income and very low-income households – both those who rent and those who own – are more affected by cost burden. However, it is notable that marginalized populations (BIPOC, persons with disabilities, LGBTQ, etc.) are significantly over-represented among these lower income thresholds, meaning they are also disproportionately affected by the associated housing problems.

Most cost-burdened homeowners are low-income households, whereas the larger share of cost-burdened renters are very low-income households. In the case of severe cost burden, the largest share of both renters and homeowners are extremely low-income households. Specifically, among renters with a severe housing cost burden, 76.3% are extremely low-income and 19.7% are very low-income households. Among homeowners with a severe housing cost burden, 53.7% are extremely low-income and 29.6% are very low-income households.

Describe the characteristics and needs of Low-income individuals and families with children (especially extremely low-income) who are currently housed but are at imminent risk of either residing in shelters or becoming unsheltered 91.205(c)/91.305(c)). Also discuss the needs of formerly homeless families and individuals who are receiving rapid re-housing assistance and are nearing the termination of that assistance

Poverty, housing instability, housing cost burden, and being susceptible to destabilizing events (such as sudden unemployment, unanticipated medical issues, or death of a spouse) are all characteristics of Maine's low income families who are most at-risk of becoming unsheltered. Additionally, those who are unable to pass background checks, who have substance abuse or mental health problems, who are escaping domestic violence, and who are aging out of the foster system are all individuals with especially elevated risk of becoming unsheltered.

The Maine Continuum of Care identified a set of characteristics that relate to housing instability and risk of homelessness, which include: lack of access to rental assistance and security deposits, eviction, family conflict, unemployment/low income, domestic violence, substance abuse, and mental health issues.

MaineHousing has identified some additional characteristics of households unusually susceptible to homelessness, including individuals with disabilities; single mothers of high-need children; persons reentering the public after a period of incarceration; and family disintegration situations such as divorce, separation, or other reasons for a wage earner exiting the household. Self-reported characteristics for housing instability among Maine residents include the inability to find affordable housing, unemployment or underemployment, and transportation issues.

The needs of low-income individuals and families at risk of becoming unsheltered include the need for ongoing subsidy, support services to help identify adequate housing, flexible financial assistance, transportation, obtaining or maintaining employment, improving credit scores, and case management services.

If a jurisdiction provides estimates of the at-risk population(s), it should also include a description of the operational definition of the at-risk group and the methodology used to generate the estimates:

N/A

Specify particular housing characteristics that have been linked with instability and an increased risk of homelessness

For renters, specific housing characteristics linked to housing instability and at-risk status are high rents, rental and utility arrears, security deposit requirements and lot rents. Homeowners face different housing cost challenges such as property taxes, repair and maintenance expense for aging housing stock, and likely higher utility costs. In both cases, income is the greatest predictor of housing problems and housing problems are likely the greatest predictor of housing instability. It is estimated that 25.4%, or 144,645, of all households in Maine are very low-income to extremely low-income households. Among those households, two out of every three has one or more severe housing problem (CHAS, 2016-2020). Finally, according to HUD, people experiencing homelessness are more likely to be disabled, members of a racial minority group, male, and/or a veteran than the comparable housed population living in poverty.

Discussion

Like the rest of the nation, Maine has seen growth in housing costs greatly outpace growth in household income, at least partially driven by flagging housing production post-Great Recession and the resulting shortage of housing. Importantly, Maine also has an aging population and a rapidly aging housing stock, more so than the rest of the nation. This means the housing costs are high, housing needs are shifting, repairs and renovations are greatly needed, and many Mainers are ill-equipped to afford these increasing costs. Although the needs are greater for many of the fundamentally more vulnerable populations, such as those on a fixed income, with a disability, or fleeing domestic violence, it remains great among just about every subgroup of the population. Until the housing shortage has been greatly mitigated, housing or financial support for most low-income households will remain necessary to avoid those households experiencing housing instability or homelessness.

NA-15 Disproportionately Greater Need: Housing Problems - 91.305 (b)(2)

Assess the need of any racial or ethnic group that has disproportionately greater need in comparison to the needs of that category of need as a whole.

Introduction

The population of Maine is disproportionately white and non-Hispanic. However, the communities of racial and ethnic minorities that do reside in Maine are overrepresented among the lower income brackets in the state. Notably, when examining the 0-30% AMI and 30-50% AMI income ranges, much larger shares of BIPOC (Black, Indigenous, or other persons of color) households have one or more housing problem than is the case for white, non-Hispanic households. The same is not true of the two higher income ranges. Additionally, BIPOC households represent a larger share of total households in each of the lower income ranges than those closer to 100% AMI, falling from 5.6% of the 0-30% AMI group down to 3.2% of the 80-100% AMI group. Although the BIPOC population share in Maine is small relative to most other U.S. states, the observed concentration of housing problems among very low-income BIPOC households raises a greater concern of potential marginalization or unintentional exclusion from programmatic benefits that could help address the needs.

0%-30% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	52,510	20,125	0
White	47,780	18,580	0
Black / African American	1,006	260	0
Asian	625	205	0
American Indian, Alaska Native	590	305	0
Pacific Islander	0	0	0
Hispanic	870	200	0
0	0	0	0

Table 13 - Disproportionally Greater Need 0 - 30% AMI

Alternate Data Source Name:

CHAS 2016-2020

Data Source Comments:

*The four housing problems are:

1. Lacks complete kitchen facilities,
2. Lacks complete plumbing facilities,
3. More than one person per room,
4. Cost Burden greater than 30%

30%-50% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	42,715	29,300	0
White	39,290	28,000	0
Black / African American	915	130	0
Asian	260	200	0
American Indian, Alaska Native	340	190	0
Pacific Islander	8	0	0
Hispanic	570	215	0
0	0	0	0

Table 14 - Disproportionally Greater Need 30 - 50% AMI

Alternate Data Source Name:

CHAS 2016-2020

Data Source Comments:

*The four housing problems are:

1. Lacks complete kitchen facilities,
2. Lacks complete plumbing facilities,
3. More than one person per room,
4. Cost Burden greater than 30%

50%-80% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	35,705	69,455	0
White	33,445	65,450	0
Black / African American	340	665	0
Asian	245	595	0
American Indian, Alaska Native	110	595	0
Pacific Islander	0	0	0
Hispanic	850	670	0
0	0	0	0

Table 15 - Disproportionally Greater Need 50 - 80% AMI

Alternate Data Source Name:

CHAS 2016-2020

Data Source Comments:

*The four housing problems are:

1. Lacks complete kitchen facilities,
2. Lacks complete plumbing facilities,
3. More than one person per room,
4. Cost Burden greater than 30%

80%-100% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	10,380	54,520	0
White	9,700	51,775	0
Black / African American	85	415	0
Asian	94	525	0
American Indian, Alaska Native	30	230	0
Pacific Islander	0	20	0
Hispanic	174	525	0
0	0	0	0

Table 16 - Disproportionally Greater Need 80 - 100% AMI

Alternate Data Source Name:

CHAS 2016-2020

Data Source Comments:

*The four housing problems are:

1. Lacks complete kitchen facilities,
2. Lacks complete plumbing facilities,
3. More than one person per room,
4. Cost Burden greater than 30%

Discussion

In each of the four housing income brackets, one or more minority group has a disproportionate share of housing problems relative to the bracket as a whole. Specifically:

Among households earning 0-30% of AMI, 72.3% of all households have at least one housing problem. But that rate is 79.5% for Black/African American households and 81.3% for Hispanic households.

Among households earning 30-50% of AMI, 59.3% of all households have at least one housing problem. But that rate is 72.6% for Hispanic households and 87.6% for Black/African American households. Additionally, 100% of Pacific Islander households in this bracket had at least one housing problem, but that is from a very small sample of only eight households.

Among households earning 50-80% of AMI, 34.0% of all households have at least one housing problem. But that rate is 55.9% for Hispanic households. All other racial/ethnic groups are at or below the average.

Among households earning 80-100% of AMI, 16.0% of all households have at least one housing problem. But that rate is 17.0% for Black/African American households and 24.9% for Hispanic households.

On average, Black and African American households have the greatest need among households earning below 50% of AMI, and Hispanic households have the greatest need among households earning 50-100% of AMI.

NA-20 Disproportionately Greater Need: Severe Housing Problems – 91.305(b)(2)

Assess the need of any racial or ethnic group that has disproportionately greater need in comparison to the needs of that category of need as a whole.

Introduction

The population of Maine is disproportionately white and non-Hispanic. However, the communities of racial and ethnic minorities that do reside in Maine are overrepresented among the lower income brackets in the state. Notably, the share of households that are non-white and non-Hispanic increases moving along the scale from the 80-100% AMI income bracket towards the 0-30% AMI income bracket. Although the non-white, non-Hispanic population share in Maine is small relative to most other US states, this raises a greater concern of potential marginalization or unintentional exclusion from programmatic benefits.

0%-30% of Area Median Income

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	39,380	33,250	0
White	35,425	30,935	0
Black / African American	825	450	0
Asian	565	265	0
American Indian, Alaska Native	370	530	0
Pacific Islander	0	0	0
Hispanic	775	295	0
0	0	0	0

Table 17 – Severe Housing Problems 0 - 30% AMI

Alternate Data Source Name:

CHAS 2016-2020

Data Source Comments:

*The four severe housing problems are:

1. Lacks complete kitchen facilities,
2. Lacks complete plumbing facilities,
3. More than 1.5 persons per room,
4. Cost Burden over 50%

30%-50% of Area Median Income

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	16,910	55,115	0
White	15,535	51,755	0

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Black / African American	160	885	0
Asian	160	300	0
American Indian, Alaska Native	49	485	0
Pacific Islander	8	0	0
Hispanic	195	590	0
Other	0	0	0

Table 18 – Severe Housing Problems 30 - 50% AMI

Alternate Data Source Name:

CHAS 2016-2020

Data Source Comments:

*The four severe housing problems are:

1. Lacks complete kitchen facilities,
2. Lacks complete plumbing facilities,
3. More than 1.5 persons per room,
4. Cost Burden over 50%

50%-80% of Area Median Income

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	9,190	95,970	0
White	8,585	90,300	0
Black / African American	105	900	0
Asian	60	780	0
American Indian, Alaska Native	60	650	0
Pacific Islander	0	0	0
Hispanic	225	1,285	0
Other	0	0	0

Table 19 – Severe Housing Problems 50 - 80% AMI

Alternate Data Source Name:

CHAS 2016-2020

Data Source Comments:

*The four severe housing problems are:

1. Lacks complete kitchen facilities,
2. Lacks complete plumbing facilities,
3. More than 1.5 persons per room,
4. Cost Burden over 50%

80%-100% of Area Median Income

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	2,475	62,435	0
White	2,220	59,260	0
Black / African American	69	430	0
Asian	15	600	0
American Indian, Alaska Native	0	260	0
Pacific Islander	0	20	0
Hispanic	49	650	0
Other	0	0	0

Table 20 – Severe Housing Problems 80 - 100% AMI

Alternate Data Source Name:

CHAS 2016-2020

Data Source Comments:

*The four severe housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than 1.5 persons per room, 4. Cost Burden over 50%

Discussion

Just as it was for housing problems, one or more minority group has a disproportionate share of severe housing problems relative to the bracket, in each of the four housing income brackets. Specifically:

Among households earning 0-30% of AMI, 54.2% of all households have at least one severe housing problem. But that rate is 64.7% for Black/African American households, 68.1% for Asian households, and 72.4% for Hispanic households.

Among households earning 30-50% of AMI, 23.5% of all households have at least one severe housing problem. But that rate is 24.8% for Hispanic households and 34.8% for Asian households. As with this income bracket for any housing problems, 100% of the eight Pacific Islander households have one or more severe housing problem.

Among households earning 50-80% of AMI, 8.7% of all households have at least one severe housing problem. But that rate is 10.4% for Black/African American households and 14.9% for Hispanic households.

Among households earning 80-100% of AMI, 3.8% of all households have at least one severe housing problem. But that rate is 7% for Hispanic households and 13.8% for Black/African American households.

It is apparent that for the small number of low-income to extremely low-income Pacific Islander households in Maine, there are severe housing needs. Asian American households also have disproportionate

representation with severe housing needs, especially among the lowest income brackets. However, the largest disproportionate need remains concentrated among Hispanic and Black or African American households.

DRAFT

NA-25 Disproportionately Greater Need: Housing Cost Burdens – 91.305 (b)(2)

Assess the need of any racial or ethnic group that has disproportionately greater need in comparison to the needs of that category of need as a whole.

Introduction

The population of Maine is disproportionately white and non-Hispanic. However, the communities of racial and ethnic minorities that do reside in Maine are overrepresented among the lower income brackets in the state. As previously observed, BIPOC households represent a larger share of total households in each of the lower income ranges than those closer to 100% AMI, decreasing from 5.6% BIPOC in the 0-30% AMI group down to 3.2% BIPOC in the 80-100% AMI group. Although the BIPOC population share in Maine is small relative to most other US states, the concentration of BIPOC households among the lowest income ranges raises a greater concern of potential marginalization or unintentional exclusion from programmatic benefits that could help address their needs.

Housing Cost Burden

Housing Cost Burden	<=30%	30-50%	>50%	No / negative income (not computed)
Jurisdiction as a whole	419,665	84,410	60,239	5,245
White	400,430	78,705	55,105	4,815
Black / African American	2,715	1,355	825	70
Asian	3,150	520	695	135
American Indian, Alaska Native	2,260	610	435	35
Pacific Islander	55	0	4	0
Hispanic	3,895	1,525	1,125	0

Table 21 – Greater Need: Housing Cost Burdens AMI

Alternate Data Source Name:

CHAS 2016-2020

Data Source Comments:

Discussion

Housing cost burden and severe cost burden (50% or more) are significantly concentrated among communities of color, even more than is true for other housing problems. This is true for all the racial and ethnic groups identified in the CHAS data apart from Pacific Islander households, who comprise the smallest minority population in the data. Overall, 25.4% of households are living with any cost burden and 10.6% are living with severe cost burden. The greatest concentration of housing cost burden is among Hispanic and Black or African American households, coming in at 40.5% and 43.9% respectively. Both groups significantly exceed the average for severe cost burden as well, with 17.2% for Hispanic households and 16.6% for Black or African American households.

NA-30 Disproportionately Greater Need: Discussion – 91.305 (b)(2)

Are there any Income categories in which a racial or ethnic group has disproportionately greater need than the needs of that income category as a whole?

In general, there is a greater need among each racial or ethnic group at all income levels. However, as we look at households in the 50-80% AMI and 80-100% AMI ranges, where housing problems become less common on average, the prevalence of housing problems is more persistent for certain racial groups than it is for the broader population. In particular, the share of Hispanic households earning 50-80% of AMI living with any housing problem is 64.7% greater than average for that income category; and the share of Black or African American households earning 80-100% of AMI and yet still living with a severe housing problem is more than three times greater than average for the income category.

If they have needs not identified above, what are those needs?

More, and higher quality, micro-data is required to address this question.

Are any of those racial or ethnic groups located in specific areas or neighborhoods in your community?

According to the Census Bureau's 2023 Current Population Estimates, Hispanic households are slightly concentrated in Cumberland and Washington counties; Black or African American households are significantly concentrated in Cumberland and Androscoggin counties; Asian households are concentrated in Cumberland county and, to a lesser extent, York county; and American Indian or Alaska Native households are concentrated in Aroostook and Washington counties.

NA-35 Public Housing – (Optional)

Introduction

This section is optional for State's.

Totals in Use

	Program Type								
	Certificate	Mod-Rehab	Public Housing	Vouchers			Special Purpose Voucher		
				Total	Project - based	Tenant - based	Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
# of units vouchers in use	0	107	1,722	8,057	315	7,145	44	114	363

Table 22 - Public Housing by Program Type

*includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition

Data Source: PIC (PIH Information Center)

Characteristics of Residents

	Program Type								
	Certificate	Mod-Rehab	Public Housing	Vouchers			Special Purpose Voucher		
				Total	Project - based	Tenant - based	Veterans Affairs Supportive Housing	Family Unification Program	
# Homeless at admission	0	1	2	198	9	162	15	6	
# of Elderly Program Participants (>62)	0	6	783	1,614	216	1,342	2	0	
# of Disabled Families	0	34	442	3,656	64	3,187	23	24	
# of Families requesting accessibility features	0	107	1,722	8,057	315	7,145	44	114	

	Program Type							
	Certificate	Mod-Rehab	Public Housing	Vouchers			Special Purpose Voucher	
				Total	Project - based	Tenant - based	Veterans Affairs Supportive Housing	Family Unification Program
# of HIV/AIDS program participants	0	0	0	0	0	0	0	0
# of DV victims	0	0	0	0	0	0	0	0

Table 23 – Characteristics of Public Housing Residents by Program Type

Data Source: PIC (PIH Information Center)

Race of Residents

Race	Program Type								
	Certificate	Mod-Rehab	Public Housing	Vouchers			Special Purpose Voucher		
				Total	Project - based	Tenant - based	Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
White	0	105	1,652	7,757	307	6,862	44	112	360
Black/African American	0	1	34	220	4	210	0	0	3
Asian	0	0	16	30	1	29	0	0	0
American Indian/Alaska Native	0	1	18	46	3	40	0	2	0
Pacific Islander	0	0	2	4	0	4	0	0	0
Other	0	0	0	0	0	0	0	0	0

*includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition

Table 24 – Race of Public Housing Residents by Program Type

Data Source: PIC (PIH Information Center)

Ethnicity of Residents

Ethnicity	Program Type								
	Certificate	Mod-Rehab	Public Housing	Vouchers			Special Purpose Voucher		
				Total	Project - based	Tenant - based	Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
Hispanic	0	3	22	82	2	76	0	2	0
Not Hispanic	0	104	1,700	7,975	313	7,069	44	112	363

***includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition**

Table 25 – Ethnicity of Public Housing Residents by Program Type

Data Source: PIC (PIH Information Center)



Section 504 Needs Assessment: Describe the needs of public housing tenants and applicants on the waiting list for accessible units:

What are the number and type of families on the waiting lists for public housing and section 8 tenant-based rental assistance? Based on the information above, and any other information available to the jurisdiction, what are the most immediate needs of residents of public housing and Housing Choice voucher holders?

How do these needs compare to the housing needs of the population at large

Discussion:

DRAFT

NA-40 Homeless Needs Assessment – 91.305(c)

Introduction:

The Point in Time survey (PIT) remained relatively flat from 2014 – 2020, with approximately 1,200 Mainers experiencing homelessness in shelters and outdoors. With the exception of 2021, when no unsheltered count was completed due to the COVID-19 pandemic, the count significantly increased over the following few years, peaking in 2023 with 3,467 persons in shelters and on the streets. Complex factors related to the pandemic impacted Maine's homeless population while at the same time additional funding in the state allowed for sheltering in non-congregate settings, likely giving us a more accurate picture of those truly in need.

Since 2019, the state's ESG-funded shelters have provided services for between 4,000 and 5,000 unduplicated individuals annually. In 2023, the total unduplicated count served was 4,838. Prior to 2019, the average count of shelter clients in ESG funded shelters was closer to 6,000; however, this decrease is likely due to increased lengths of stay among shelter guests resulting from more limited and oversubscribed housing resources for those experiencing homelessness.

The need for homeless services has not decreased over the past five years. Lack of affordable housing options, substance use disorders, and lack of economic opportunities are among the issues keeping the need high. Maine is among the most rural states in the union, but most homeless services are located in urban-metro counties. This disparity in service location leads to an understated need in rural areas.

If data is not available for the categories "number of persons becoming and exiting homelessness each year," and "number of days that persons experience homelessness," describe these categories for each homeless population type (including chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth):

Nature and Extent of Homelessness: (Optional)

Race:	Sheltered:	Unsheltered (optional)
White	858	240
Black or African American	682	18
Asian	0	0
American Indian or Alaska Native	24	9
Pacific Islander	0	0
Ethnicity:	Sheltered:	Unsheltered (optional)
Hispanic	10	0
Not Hispanic	1,680	271

Data Source
Comments:

Estimate the number and type of families in need of housing assistance for families with children and the families of veterans.

In the 2024 PIT, 639 persons (33% of all individuals counted) experiencing homelessness in shelter and outdoors were in households with at least one child (including youth only households); 64 (3%) were individuals in veteran households, of which 3 were in families with at least one child.

Describe the Nature and Extent of Homelessness by Racial and Ethnic Group.

Maine’s non-white population is approximately 9%, whereas it was 44% in the 2024 PIT for those experiencing homelessness in shelter and outdoors. The largest racial minority in the PIT was black or African-American, comprising 36% of the individuals in the survey. This racial group comprises just 2% of Maine’s population. This disparity is largely driven by an influx of asylum seekers who are not immediately eligible for federal housing aid. ESG-funded shelters are aware of this disparity and are committed to providing services and housing navigation to all racial groups.

Describe the Nature and Extent of Unsheltered and Sheltered Homelessness.

The vast majority of persons known to experience homelessness are involved with Maine’s ESG-funded shelters. In the 2024 PIT, a total of 1,963 individuals were identified, 86% of whom were in a shelter or emergency hotel. There are known deficiencies in Maine’s unsheltered methodology that include winter timing, rural geography, and lack of annual methodology beyond the PIT. With a homeless system redesign that incorporated coordinator positions for the nine service areas across the state, count efforts have improved. In 2023, 273 persons who were unsheltered on the night of the count were reported on the PIT. In 2023, Maine’s ESG-funded shelters served 4,838 unduplicated individuals. For those who enter an emergency shelter, average length of stays has increased to 97 days in the past two years.

Discussion:

The number of families and unaccompanied youth who are unsheltered remains a concern. Racial disparities will remain an issue for the foreseeable future with the influx of individuals and families seeking asylum, many of whom are ineligible for existing programmatic support. Maine is in need of more robust outreach efforts throughout the state, and groups like the Maine CoC and Statewide Homeless Council are focused on system level strategies to address this.

NA-45 Non-Homeless Special Needs Assessment – 91.305 (b,d)

Introduction

23% of Maine’s population is over the age of 65, relative to a national average of 17.7%. Of those under the age of 65, approximately 11.5% of Mainers have a disability, which is almost a third more than the national percentage. This is such a critical issue in housing because the need is greater than simply providing accessible units to those with special needs, there must also be sufficient accessible units available to permit persons with special needs to move about the State with the same freedom as those without.

Describe the characteristics of special needs populations in your community:

Maine’s largest special needs populations are residents aged 65 and over as well as those experiencing a disability. In both cases, a lower than average median income compounds the challenges for these Mainers. Each age cohort and difficulty has a unique set of characteristics.

For Mainers aged 65 and up, major factors affecting quality of life are aging in place and accessibility, transportation, personal services, managing finances on a low, often fixed income, and options for accommodated living. As nearly 30% of Maine’s 65 and up cohort are disabled, there is intersectionality between the two groups.

On the other hand, 53% of Mainers experiencing disability in 2022 were aged 18 to 64, with a cognitive or ambulatory disability that affects occupational ability. Earning an income and obtaining the services needed to facilitate access to employment are obstacles, which may contribute to a median income among Mainers with a disability that is 43% lower than the state as a whole.

What are the housing and supportive service needs of these populations and how are these needs determined?

Older Mainers experiencing disabilities may need home modifications to age in place, particularly as Maine’s housing stock is among the oldest in the nation, but may not have the financial capacity for modifications, maintenance and repairs. Working age Mainers experiencing disabilities and living on a lower median income need housing that is affordable and accessible, both physically and in terms of commuting to work as needed in a rural state without well-established public transportation. Residents with disabilities across the age range need a reasonable proximity to the services needed. In addition to the public input, research and anecdotal data, the determination of needs is shaped by Maine Human Rights Commission statistics evidencing that the highest category of Fair Housing complaints received is regarding disability.

Discuss the size and characteristics of the population with HIV/AIDS and their families within the Eligible Metropolitan Statistical Area:

[Source: AIDSvu.org]. A total of 1,774 people were living with HIV in Maine in 2022, with Cumberland County showing the highest rate of new diagnoses that year at 8 per 100,000. The vast majority (79%) living with the disease are male, with the highest age concentration being the 55 to 64 range. In terms of race and

ethnicity of those living with HIV in Maine, the major groupings are 69% white, 18% black and just under 8% Hispanic.

If the PJ will establish a preference for a HOME TBRA activity for persons with a specific category of disabilities (e.g., persons with HIV/AIDS or chronic mental illness), describe their unmet need for housing and services needed to narrow the gap in benefits and services received by such persons. (See 24 CFR 92.209(c)(2) (ii))

N/A

Discussion:

MaineHousing will continue to be instrumental in addressing the special needs of both renters and homeowners in Maine. MaineHousing is doing this with development standards that exceed federal requirements for new housing production, ensuring that a large share of new affordable housing units are easily adaptable for residents with special needs. At the same time, MaineHousing serves those in existing housing by offering home modifications to address the needs of those with a disability through the Home Accessibility and Repair Program, and to facilitate safety for older Mainers who wish to remain in their home through the Community Aging in Place Program.

NA-50 Non-Housing Community Development Needs - 91.315 (f)

Describe the jurisdiction's need for Public Facilities:

The State of Maine understands the importance of Public Facilities to communities, which is why in the last 34 years the program has invested over \$45 million for hundreds of facilities.

The feedback from communities statewide is that in these challenging economic times, making more impactful investments in Economic Development, Housing and Public Infrastructure and Public Service is the appropriate strategy for the 2025-2029 program years.

How were these needs determined?

The assessment process contains six elements: public information-gathering forums*; a formal public hearing and information gathering process; a review of related or similar federal or state programs; demographic and economic data; a review of historic CDBG applications; and the State's economic development strategy.

Describe the jurisdiction's need for Public Improvements:

The State of Maine understands the importance of Public Improvements to communities. The feedback from communities statewide is that in these challenging economic times, making impactful investments in Economic Development, Housing and Public Improvements, and Public Services comprise the appropriate strategy for the 2025-2029 program years.

How were these needs determined?

The assessment process contains six elements: public information-gathering forums*; a formal public hearing and information gathering process; a review of related or similar federal or state programs; demographic and economic data; a review of historic CDBG applications; and the State's economic development strategy.

Describe the jurisdiction's need for Public Services:

The State of Maine understands the importance of Public Services to communities. The feedback from communities statewide is that in these very challenging economic times, making more impactful investments in Economic Development, Housing and Public Improvements, and Public Services comprise the appropriate strategy for the 2025-2029 program years.

How were these needs determined?

The assessment process contains six elements: public information-gathering forums*; a formal public hearing and information gathering process; a review of related or similar federal or state programs; demographic and economic data; a review of historic CDBG applications; and the State's economic development strategy.

**The Public Forums element consisted of an open discussion, at each group presentation, training session, and meeting with regional service providers, to examine the potential for new features and/or improvements to existing CDBG programs to address community needs and evaluate their potential effectiveness.*

Housing Market Analysis

MA-05 Overview

Housing Market Analysis Overview:

The following provides an overview of the housing market in Maine, incorporating specific data elements in compliance with HUD requirements and additional contextual data as needed. It illustrates a housing market suffering from a significant supply shortage, resulting in widespread issues with affordability due to excess demand for the existing supply.

During the five-year period from 2017 through 2022, Maine's population grew by about 27,000 people and more than 25,000 households. During that same period, the total housing stock in Maine increased by only 6,090 units but total occupied housing units increased by 26,110 units. This effectively consumed the supply of vacant units in the economy, whether they were previously vacant and available or the seasonal/vacation homes that were suitable for permanent residency. Vacancy rates, which are considered healthy when around 5% of the housing stock, fell from 2.6% in 2017 to an alarming 1.6% by 2022. This is indicative of a severe shortage of housing stock, which drives up housing prices and simultaneously constricts economic mobility and efficiency.

In MaineHousing's 2025-2029 Consolidated Plan public surveys and listening sessions, respondents expressed a need for increased housing of all types, including single-family homes, multi-family developments, rent-assisted units, and older adult housing. Respondents also indicated that financial support for property owners to preserve existing housing was important. By small but consistent margins, the greatest support was for more rent-assisted units and for more housing of all types in smaller cities and towns. This is consistent with the fact that the current shortage of available homes is causing unsustainable levels of housing cost burden for an increasing number of households in Maine by steadily driving up rents and home prices.

MA-10 Number of Housing Units – 91.310(a)

Introduction

Maine has a total of almost 742,000 housing units, according to the 2022 ACS 5-year estimates. However, more than 20% of those units are vacant and very few of the vacant units are available for rent or sale. Whereas a healthy housing market generally has a vacancy rate of about 5%, in the past decade the rate of vacant and available units as a proportion of total housing in Maine has decreased from 3% to just 1.6%. This is a strong indicator that there is insufficient housing stock to address the demand for housing, both from those currently residing in Maine as well as those who would like to move to Maine from elsewhere.

All residential properties by number of units

Property Type	Number	%
1-unit detached structure	519,234	70%
1-unit, attached structure	17,577	2%
2-4 units	77,013	10%
5-19 units	39,331	5%
20 or more units	26,833	4%
Mobile Home, boat, RV, van, etc	61,815	8%
Total	741,803	100%

Table 26 – Residential Properties by Unit Number

Alternate Data Source Name:

ACS 2018-2022

Data Source Comments:

Unit Size by Tenure

	Owners		Renters	
	Number	%	Number	%
No bedroom	1,731	0%	8,680	6%
1 bedroom	17,168	4%	47,842	31%
2 bedrooms	103,789	24%	57,945	38%
3 or more bedrooms	303,551	71%	39,466	26%
Total	426,239	99%	153,933	101%

Table 27 – Unit Size by Tenure

Alternate Data Source Name:

ACS 2018-2022

Data Source Comments: An IDIS Rounding error is causing Total % to be less than / greater than 100. The data is correct.

Describe the number and targeting (income level/type of family served) of units assisted with federal, state, and local programs.

The vast majority of rent-assisted units target low-income or extremely low-income households, meaning at or below 60% of AMI or 30% of AMI, respectively. A smaller portion are part of programs, such as MaineHousing’s Rural Affordable Rental Program, that allow for households with income up to 80% of AMI. We estimate a current stock of more than 43,000 rent-assisted or rent-restricted units in the state of

Maine. Of those, approximately 21,000 are older adult units, 20,000 are family units, and 7,600 are handicap accessible units.

Provide an assessment of units expected to be lost from the affordable housing inventory for any reason, such as expiration of Section 8 contracts.

By the end of 2029, at least 286 HUD, RD and MaineHousing properties with 8,897 rent-assisted units will have been online for more than 30 years. Of those, 218 properties with 7,679 rent-assisted units will have been online for more than 45 years. However, in nearly all cases, properties in the MaineHousing portfolio have refinanced and extended their affordability covenants meaning the share of units expected to be lost is only a small portion. Similarly, properties with Section 8 funding contracts tend to renew their contracts prior to expiration. The greatest risk exists among the Rural Development portfolio, which accounts for about 16.5% of the HUD, RD and MaineHousing properties. Rural Development allows for prepayment, which can result in loss of affordability. MaineHousing, under statute, has first claim on such properties and continues to work with partners to ensure these units are kept affordable. The available data on the age of the RD developments is unreliable, so it is not possible to reasonably approximate the number that may soon exit their affordability covenants.

Does the availability of housing units meet the needs of the population?

No. Across the spectrum there is excess demand for housing, including housing for low- and moderate-income households, accessible housing for those with physical disabilities, supportive housing for those with special needs, housing for older adults, and housing for large or multi-generational families. The steady increases in home prices and rental rates across all geographies, housing types, and income brackets is market evidence of an overall shortage of housing units. The 2023 State of Maine Housing Production Needs Study laid out the evidence of this shortage in detail, finding that the shortage of housing was not only increasing housing prices but constraining the growth of Maine’s labor markets. Looking at the ratios of available housing units to households and the deficit of available units to job openings, the study finds evidence of significant deficits in all regions and all income brackets.

Describe the need for specific types of housing:

Maine is in need of housing that is suitable to the needs of older adults, including the required access to supportive services. According to Census data, between 2012 and 2022 the population of Mainers aged 65 or greater increased by more than 80,000, from 213,231 to 293,488. During the same period, the total population of the state increased by less than 38,000. Since those older adults have fewer dependents in their homes, may consider exiting the workforce and relying on a fixed income, and sometimes must cope with new health concerns and reduced mobility, they may need to downsize, relocate nearer to healthcare services or supportive communities, or have a living space with special accommodations for their personal safety. This amounts to an increasing need for housing that has specific geographic, community, and physical characteristics.

Maine is also in need of accessible housing for individuals with disabilities. ACS 5-year estimates show that 11.5% of Maine’s population under the age of 65 has some form of disability while approximately 17.5% of

statewide rent-assisted housing is accessible. However, that seemingly favorable comparison fails to account for the fact that households with disabilities are over-represented in the lower income brackets and are therefore more frequently in need of housing that offers accessibility as well as rental assistance. In MaineHousing's 2024 Fair Housing Survey, when asked how well housing in their community meets the needs of those with physical disabilities, a significant majority of respondents answered that, although there is housing that meets those needs, there is not enough available for those who need it.

The third and final area of specific need is for housing to accommodate large family units. This is a rising issue as cities and towns accommodate influxes of domestic and international immigration. As increasing numbers of older Mainers retire but choose to remain in their homes, new Mainers seeking to fill those job openings face not only a shortage of available housing but a particularly intense shortage of housing with sufficient bedrooms for intergenerational families. The mismatch between the housing units that have been created in the past few decades and the family composition of many households seeking to live in Maine will continue to create additional frictions in the housing market because households that have found housing will continue to seek housing that better suits their preferences.

Discussion

As implied in the introduction to this section, Maine is experiencing a shortage of housing stock due to historic underproduction, while simultaneously experiencing economic and demographic changes that are creating additional housing market frictions. In addition, the Office of the Maine State Economist projects continued population growth at the same time as the age profile of the state, already the oldest in the nation, shifts to an ever-larger share aged 65 or older. Although that population growth is a net positive for the economy, it also means that demand for housing will continue to increase and therefore serves to emphasize the need for increased housing production.

MA-15 Cost of Housing – 91.310(a)

Introduction

The rising cost of housing is a major driver of economic discontent in the post-COVID era. In significant part, the recent surge of inflation was sustained by rising home prices, rental rates, and energy-related costs. In much the same manner that inflation has slowed but not reversed, home prices and construction costs appear to have stopped rising so quickly but show no sign of returning to previous levels.

For this section, because of rapidly increasing home prices and rents over the previous few years, the 2023 ACS 1-year estimates of home prices and rents are used, rather than the 5-year ACS estimates used elsewhere. This is because median values over five-year periods tend to best estimate values at the midpoint of that period, which is particularly problematic when there has been rapid growth in recent years.

Cost of Housing

	Base Year: 2010	Most Recent Year: 2023	% Change
Median Home Value	176,200	310,700	76%
Median Contract Rent	610	1,189	95%

Table 28 – Cost of Housing

Alternate Data Source Name:

Census Base Year 2010

Data Source Comments:

Rent Paid	Number	%
Less than \$500	23,473	30.3%
\$500-999	62,908	51.8%
\$1,000-1,499	34,193	14.3%
\$1,500-1,999	15,803	2.2%
\$2,000 or more	8,315	1.5%
<i>Total</i>	<i>144,692</i>	<i>100.0%</i>

Table 29 - Rent Paid

Alternate Data Source Name:

ACS 2018-2022

Data Source Comments:

Housing Affordability

Number of Units affordable to Households earning	Renter	Owner
30% HAMFI	35,065	No Data
50% HAMFI	46,500	56,635
80% HAMFI	73,045	92,310
100% HAMFI	No Data	40,320
<i>Total</i>	<i>154,610</i>	<i>189,265</i>

Table 30 – Housing Affordability

Alternate Data Source Name:

CHAS 2016-2020

Data Source Comments:

Monthly Rent

Monthly Rent (\$)	Efficiency (no bedroom)	1 Bedroom	2 Bedroom	3 Bedroom	4 Bedroom
Fair Market Rent	0	0	0	0	0
High HOME Rent	0	0	0	0	0
Low HOME Rent	0	0	0	0	0

Table 31 – Monthly Rent

Data Source Comments:

Area	Home Rent Limit	Efficiency	1BR	2BR	3BR	4BR	5BR	6BR
Bangor, ME HMFA	Low	828	887	1065	1231	1372	1515	1657
	High	881	971	1239	1567	1705	1888	2048
Penobscot County, ME (part) HMFA	Low	721	773	927	1071	1195	1318	1442
	High	740	794	1043	1298	1457	1632	1768
Lewiston-Auburn, ME MSA	Low	738	791	948	1096	1222	1349	1475
	High	756	877	1111	1391	1533	1672	1812
Portland, ME HMFA	Low	1116	1195	1435	1657	1848	2040	2231
	High	1319	1512	1844	2122	2348	2571	2796
York-Kittery-South Berwick, ME HMFA	Low	1098	1176	1412	1631	1820	2008	2196
	High	1150	1292	1697	2088	2310	2530	2570
Cumberland County, ME (part) HMFA	Low	893	957	1148	1327	1481	1634	1786
	High	1035	1162	1472	1692	1868	2042	2216
Sagadahoc County, ME HMFA	Low	848	913	1095	1265	1411	1557	1702
	High	848	1023	1251	1611	1778	1942	2108
York County, ME (part) HMFA	Low	857	918	1102	1273	1420	1566	1713
	High	1023	1136	1411	1621	1789	1956	2122
Aroostook County, ME	Low	664	758	927	1071	1195	1318	1442
	High	664	758	948	1292	1374	1580	1768
Franklin County, ME	Low	721	773	927	1071	1195	1318	1442
	High	723	812	1067	1359	1421	1632	1768
Hancock County, ME	Low	773	828	993	1148	1281	1413	1545
	High	985	1002	1188	1459	1582	1756	1903
Kennebec County, ME	Low	761	815	978	1131	1262	1392	1522
	High	857	860	1104	1374	1583	1728	1873
Knox County, ME	Low	802	859	1031	1191	1328	1466	1603
	High	890	929	1120	1406	1585	1823	1978
Lincoln County, ME	Low	820	878	1053	1218	1358	1499	1639
	High	942	978	1183	1550	1654	1867	2026
Oxford County, ME	Low	721	773	927	1071	1195	1318	1442
	High	814	820	1077	1321	1496	1632	1768
Piscataquis County, ME	Low	697	773	927	1071	1195	1318	1442
	High	697	782	1028	1271	1496	1632	1768

Rental Data 2

Somerset County, ME	Low	721	773	927	107 1	119 5	131 8	144 2
	High	815	846	102 6	126 9	146 5	163 2	176 8
Waldo County, ME	Low	721	773	927	107 1	119 5	131 8	144 2
	High	886	892	116 0	135 9	149 6	163 2	176 8
Washington County, ME	Low	669	751	927	107 1	119 5	131 8	144 2
	High	669	751	987	135 9	145 3	163 2	176 8

Rental 3

Monthly Rent –Not available at state level

HUD Fair Market Rents	SRO	OBR	1BR	2BR	3BR	4BR	5BR	6BR
METROPOLITAN FMR AREAS								
Bangor HMFA	776	1034	1114	1424	1825	1890	2174	2457
Cumberland HMFA	898	1197	1330	1745	2191	2667	3067	3467
Lewiston-Auburn MSA	674	898	994	1268	1663	1845	2122	2399
Penobscot HMFA	629	839	880	1155	1455	1723	1981	2240
Portland HMFA	1034	1379	1563	2011	2464	2763	3177	3592
Sagadahoc HMFA	778	1037	1168	1435	2011	2410	2772	3133
York HMFA	872	1162	1312	1616	2134	2351	2704	3056
York-Kittery-South Berwick HMFA	1014	1352	1528	1971	2552	3310	3807	4303
NONMETROPOLITAN COUNTIES								
Androscoggin	674	898	994	1268	1663	1845	2122	2399
Aroostook	548	730	786	986	1351	1407	1618	1829
Franklin	574	765	851	1116	1474	1480	1702	1924
Hancock	758	1011	1017	1202	1588	1594	1833	2072
Kennebec	671	895	901	1160	1454	1739	2000	2261
Knox	606	808	997	1178	1471	1798	2068	2337
Lincoln	812	1082	1103	1244	1643	1649	1896	2144
Oxford	623	830	835	1096	1435	1840	2116	2392
Piscataquis	578	771	857	1124	1354	1499	1724	1949
Somerset	631	841	911	1053	1350	1510	1737	1963
Waldo	710	946	952	1219	1576	1694	1948	2202
Washington	528	704	782	1026	1438	1541	1772	2003

Table 6.1 – Regional Monthly Fair Market Rents

Data Source: HUD 2025 Fair Market Rents

Rental 1

Is there sufficient housing for households at all income levels?

No. Across the spectrum there is excess demand for housing, including housing for low- and moderate-income households, and even higher income households. The steady increases in home prices and rental rates across all geographies, housing types, and income brackets is market evidence of an overall shortage of housing units. The 2023 State of Maine Housing Production Needs Study concluded that the shortage of housing was not only increasing housing prices but constraining the growth of Maine's labor markets. Looking at the ratios of available housing units to households and the deficit of available units to job openings, the study finds evidence of significant deficits in all regions and all income brackets.

How is affordability of housing likely to change considering changes to home values and/or rents?

Three factors can explain rising prices. Excess demand, rising input prices, and market power. Decreasing affordability over the past five years was largely a matter of the first two factors. As Maine progresses towards its ambitious housing production goals, excess demand will diminish, and housing will become more affordable. Simultaneously, many economists believe that input prices have stabilized and, although they are unlikely to decrease, will not continue to drive up home prices in the near future. At the same time, the Office of the Maine State Economist continues to project population growth of around 2% by 2030 (*Maine Population Outlook, 2020 to 2030*), which translates to additional housing demand. Additionally, to the extent that there is market power concentrated among the few large-scale producers of new housing, basic economic principles suggest private incentives will act to limit new production in order to maintain high prices for housing and rent. Therefore, both home values and rents are likely to become more affordable in the coming years as we make progress in addressing the housing shortage, but the public sector will need to maintain pressure to increase production and expand programmatic supports if we are to see significant gains in affordability across the income distribution.

How do HOME rents / Fair Market Rent compare to Area Median Rent? How might this impact your strategy to produce or preserve affordable housing?

In each county, the median rent estimate is lower than the Fair Market Rent (FMR) of that county. With the exception of Aroostook County, the median rent exceeds the Low HOME rent limit for each county. And in Cumberland, Penobscot, and York counties the median rent exceeds the High HOME rent limit. HUD defines High (Low) HOME rent limits to be affordable for a household earning 65% (50%) of area median income, adjusting for number of bedrooms. Thus, throughout the state most 2-bedroom rental units are unaffordable for a large share of households in that county. To address this issue, our strategy is to preserve and expand the existing housing supply while simultaneously offering programmatic support to make the existing rental stock affordable for renters today.

Discussion

Inflation-adjusted household income in Maine increased by approximately 11-12% from 2010 to 2023 (ACS 5-year estimates). During that same period, as seen in Table 32, home prices and rental rates in Maine have increased by 76.3% and 94.9% respectively. Thus, on average, housing costs in Maine have grown three to four times faster than household income since 2010.

By any measure, housing cost burden for renters and homeowners has increased more quickly over the past few years than during any other period in recent history. This was largely driven by persistently constrained housing supply and compounded by supply chain issues that have recently caused rapid growth in the cost of new construction and home repairs. Although costs appear to have stabilized, significant improvement in naturally occurring housing affordability can only be achieved through a significant expansion of the housing supply for all demographics and geographies throughout Maine. Therefore, considering the expectation of sustained population growth in Maine, any improvements in housing affordability are reliant on sustained momentum behind expanded housing production and programmatic supports. MaineHousing and the Maine Department of Economic and Community Development (DECD) continue to focus on increasingly efficient application of federal grants to maximize production of housing and community infrastructure.

MA-20 Condition of Housing – 91.310(a)

Introduction:

Maine’s housing stock is among the oldest in the nation. Approximately 21% of owner-occupied units and 43% of renter-occupied units have at least one negative housing condition. According to the most recent U.S. Census Bureau estimates (2023 ACS Table DP04), approximately ten percent more of Maine’s housing units were constructed prior to 1980 than the national average. Even more striking, 22.2% of Maine’s housing was built prior to 1940, as opposed to only 11.6% nationally. This translates to greater maintenance and repair costs for Maine homeowners and landlords, as well as generally higher costs associated with preservation of existing housing. For example, older housing may have electrical systems that are not code compliant, inadequate fire safety measures, and/or the presence of lead paint or plumbing.

Describe the jurisdiction's definition of "standard condition" and "substandard condition but suitable for rehabilitation":

A substandard condition is one that which creates a safety or health hazards and includes units that do not meet the minimum standards contained in the States housing codes and include but are not limited to:

- Lacking complete plumbing or kitchen facilities
- Have more than 1.5 people per room (severely overcrowded)
- Have more than 1 to 1.5 people per room (overcrowded)
- Have a housing cost burden greater than 50% income
- Have a housing cost burden greater than 30%

Units with substandard conditions but suitable for rehabilitation are those that are structurally sound and for which the cost of rehabilitation is substantially less than the cost of new construction or considered economically warranted.

Condition of Units

Condition of Units	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
With one selected Condition	89,266	21%	62,819	41%
With two selected Conditions	2,029	0%	3,009	2%
With three selected Conditions	374	0%	309	0%
With four selected Conditions	30	0%	3	0%
No selected Conditions	334,540	78%	87,793	57%
Total	426,239	99%	153,933	100%

Table 32 - Condition of Units

Alternate Data Source Name:

ACS 2018-2022

Data Source Comments: An IDIS Rounding error is causing Total % to be less than / greater than 100. The data is correct.

Year Unit Built

Year Unit Built	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
2000 or later	89,719	21%	19,073	12%
1980-1999	116,077	27%	35,825	23%
1950-1979	110,131	26%	43,945	29%
Before 1950	110,312	26%	55,089	36%
<i>Total</i>	<i>426,239</i>	<i>100%</i>	<i>153,932</i>	<i>100%</i>

Table 33 – Year Unit Built

Alternate Data Source Name:

ACS 2018-2022

Data Source Comments:

Risk of Lead-Based Paint Hazard

Risk of Lead-Based Paint Hazard	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
Total Number of Units Built Before 1980	220,443	52%	99,034	64%
Housing Units build before 1980 with children present	21,220	5%	12,190	8%

Table 34 – Risk of Lead-Based Paint

Alternate Data Source Name:

ACS 2018-2022

Data Source Comments:

Vacant Units

	Suitable for Rehabilitation	Not Suitable for Rehabilitation	Total
Vacant Units	0	0	0
Abandoned Vacant Units	0	0	0
REO Properties	0	0	0
Abandoned REO Properties	0	0	0

Table 35 - Vacant Units

Data Source: 2005-2009 CHAS

Source:

Need for Owner and Rental Rehabilitation

Due to the age of Maine’s housing stock, there are many households that need immediate home repairs or need to be updated for accessibility purposes. Maine’s major housing funding agencies (MaineHousing, DECD, and Rural Development) fund home repair services that are delivered by regional Community Action Agencies. Top housing needs include lead paint remediation, heating system repairs, energy conservation improvements, and repairs to leaking roofs. The delivery of these services to those in need are primarily constrained by availability of federal and state grant resources and availability of skilled labor.

Estimated Number of Housing Units Occupied by Low or Moderate Income Families with LBP Hazards

All 33,410 households with children present in homes built prior to 1980 are at risk of LBP hazards, and the majority of those are low- to moderate-income households.

All 319,477 households living in homes built prior to 1980, which includes households with children, are at risk of LBP hazards, and the majority of those are low- to moderate-income households.

Discussion:

Although MaineHousing, DECD, and USDA Rural Development all provide services or funding for home repair and remediation, the available resources are limited. The scale of current demand for LBP remediation, lead pipe replacement, home modification for special needs, and other needed home repairs far exceeds what our agencies are able to provide with current resources.

MA-25 Public and Assisted Housing – (Optional)

Introduction:

This section is optional for State's.

Totals Number of Units

	Program Type								
	Certificate	Mod-Rehab	Public Housing	Vouchers					
				Total	Project-based	Tenant-based	Special Purpose Voucher		
							Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
# of units vouchers available	0	108	1,770	8,480	329	6,022	229	131	3,811
# of accessible units									
*includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition									

Table 36 – Total Number of Units by Program Type

Data Source: PIC (PIH Information Center)

Describe the supply of public housing developments:

Describe the number and physical condition of public housing units in the jurisdiction, including those that are participating in an approved Public Housing Agency Plan:

Describe the Restoration and Revitalization Needs of public housing units in the jurisdiction:

Describe the public housing agency's strategy for improving the living environment of low- and moderate-income families residing in public housing:

Discussion:

MA-30 Homeless Facilities – 91.310(b)

Introduction

Homelessness numbers, as measured by the annual Point In Time count, increased significantly during the pandemic era. This increase was likely due to a complex interaction of pandemic-related factors, including employment shocks, fear of contagion, and increased federal funding for non-congregate shelter options. The latter opened the door to motel stays without charge, likely assisting those experiencing housing crises who would avoid congregate shelter options. In this way, it is possible that these additional pandemic shelter options helped reveal the true scale of those experiencing some version of homelessness, regardless of whether it would typically align with HUD definitions of homelessness. This and other factors lead to a greater than 200% increase in the total Point In Time count for 2022 and 2023, relative to pre-pandemic levels. However, after much of the pandemic-era supplementary funding expired, in 2024 the count reduced nearly halfway back towards pre-pandemic levels.

Facilities Targeted to Homeless Persons

	Emergency Shelter Beds		Transitional Housing Beds	Permanent Supportive Housing Beds	
	Year Round Beds (Current & New)	Voucher / Seasonal / Overflow Beds	Current & New	Current & New	Under Development
Households with Adult(s) and Child(ren)	2,173	179	117	841	0
Households with Only Adults	1,174	0	505	1,421	0
Chronically Homeless Households	0	0	0	218	0
Veterans	14	0	47	290	0
Unaccompanied Youth	65	0	68	0	0

Table 37 - Facilities Targeted to Homeless Persons

Data Source Comments:

Describe mainstream services, such as health, mental health, and employment services to the extent those services are used to complement services targeted to homeless persons

Access to mainstream resources is critical for homeless persons and families to achieve greater self-sufficiency. Specifically, assisting homeless persons in obtaining mainstream benefits is one way to increase housing stability and decrease the possibility of returning to homelessness. Each HUD-funded project in the Maine CoC as well as all ESG funded projects are expected to connect participants with mainstream resources as they assist them with housing related goals. CoC funded projects are required to report on the number of participants who receive mainstream resources at Exit on their Annual Performance Report (APR). Local homeless service providers work with program participants to connect them to resources to address food and clothing insecurity, utility assistance, and other programs that address needs of those experiencing homelessness and those who are recently housed and being provided stabilization services.

Non-cash mainstream benefits include Supplemental Nutritional Assistance, MaineCare (Medicaid) health insurance, Medicare health insurance, state children's health insurance, WIC, VA medical services, TANF child care services, TANF transportation services, other TANF funded services, temporary rental assistance, Section 8, public housing, and other rental assistance.

In addition to non-cash benefits, projects are expected to help participants increase income whenever possible to help ensure housing stability and decrease the possibility of returning to homelessness. Cash income sources include earned income, unemployment insurance, SSI, SSDI, Veteran's disability, private disability insurance, Worker's compensation, TANF or equivalent, General Assistance, Retirement (Social Security), Veteran's Pension, Child Support, and Alimony (Spousal Support).

In 2021, MaineHousing, the Maine Continuum of Care, and the Statewide Homeless Council began implementation of a new strategy for delivery of homeless services. This strategy included establishing nine regional Homeless Service Hubs and hiring a full-time Hub Coordinator for each. The Homeless Service Hubs are collaborative multi-agency teams devoted to continuous improvement of the Homeless Response System, driven by quality data. The Hub Coordinator serves as neutral backbone support for regional program implementation, working with the Statewide Homeless Council, the Maine Continuum of Care, and MaineHousing to coordinate homeless planning efforts with local shelters and organizations. Providers in the local hubs collaborate to ensure those experiencing homelessness are connected to both housing and mainstream resources through case conferencing meetings and other collaborative efforts.

List and describe services and facilities that meet the needs of homeless persons, particularly chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth. If the services and facilities are listed on screen SP-40 Institutional Delivery Structure or screen MA-35 Special Needs Facilities and Services, describe how these facilities and services specifically address the needs of these populations.

Public Housing Authority Resources – Maine's PHAs administer voucher and public housing programs. MaineHousing and other PHAs commit resources to specific populations, including those experiencing homelessness, youth, and veterans, through set asides and preferences.

Supportive Housing – MaineHousing provides funding for the development of permanent supportive housing in an effort to increase the supply of housing available to those experiencing homelessness. Properties can have preferences for those experiencing homelessness and pair subsidy with services.

Emergency Shelter – Emergency shelters in Maine provide access to immediate shelter for those experiencing homelessness. Shelters can serve specific populations such as families and youth. They provide overnight accommodations and access to meals.

Rapid Rehousing – Rapid Rehousing Programs are specifically designed to address the needs of those experiencing homelessness. The programs include housing relocation and stabilization services and often include short to medium term rental assistance in an effort to get participants quickly into housing and working toward stability.

Housing Problem Solving – This program provides services and financial assistance to those at risk and experiencing homelessness who are able to be quick rehoused through housing problem solving conversations and one time financial assistance.

Supportive Services for Veteran Families – SSVF provides prevention and rehousing services and funding for veterans and their families.

Public School Resources – Students experiencing homelessness can be identified and connected to services through McKinney Vento Liaisons within the school district. Pilot program funding for school based housing navigators and financial assistance will be rolled out in 2025.

General Assistance – GA provides resources for immediate needs including shelter and housing.

Community Resources – community resources such as food pantries, clothing closets, day drop in centers, and other services can be utilized by those experiencing homelessness.

CoC Resources – CoC resources include permanent supportive housing, rapid rehousing, and other housing & service programs specifically for those experiencing homelessness. The Maine CoC has some CoC resources dedicated to specific subpopulations such as youth and victims of domestic violence.

MA-35 Special Needs Facilities and Services – 91.310(c)

Introduction

Maine’s special needs population:

Relative to the national average, Maine’s population is older (23% aged 65+ as opposed to 17.7% nationally) and, even among those less than 65 years of age, has higher rates of disability (11.5% as opposed to 8.9% nationally) (*Census Bureau QuickFacts 2023*). As a result, special needs facilities and services are crucial issues for statewide planning in Maine.

Older adults: Maine ranks first in the nation by median age, at just below 45 years old, and will continue to hold that ranking since the 65+ population in the state is projected to grow by 36.2% from 2020 to 2030 (*Maine Population Outlook 2018 to 2028, June 2023, ME Dept. of Administrative and Financial Services*). Generationally, the Baby Boomers are by far the largest age cohort in Maine, representing 27.8% of the total population (*Ibid*).

Due to the aging of the population and the resulting increase in retirement figures, services and systems supporting older adults are expected to be increasingly strained by simultaneously increased demand and reduced labor supply. Housing, already in critically short supply, will pose further challenges; Maine’s population is more likely to “age at home” than in other states, and they will do so amid an older housing stock. There will be an increased need for housing along a continuum from independent living models through assisted living and nursing care. Affordable options will be key: the average household income for 65+ households is below the statewide median, with 9% of those living in poverty (*B17001, 2022 ACS 1-year estimates*); and intergenerational dynamics mean that a surprising number of older Mainers – almost 6,000 – are raising their own grandchildren (*DP02, 2023 ACS 1-year estimates*).

Also important is the significantly higher rate of disability among the 65+ population, who comprise 41.5% of the disabled population in Maine (*S1810, 2023 ACS 1-year estimates*) despite representing only 22.4% of the overall population, according to 2023 Census estimates (*S0101, 2023 ACS 1-year estimates*).

Disabled: An estimated 217,651 Maine residents, 15.8% of the state’s total population, live with disability (*S1810, 2023 ACS 1-year estimates*). Among those residents of ages 18 to 64, 13.2% report at least one disability with the most common forms being cognitive difficulty, ambulatory difficulty, or independent living difficulty, which is described as difficulty doing errands alone because of a physical, mental, or emotional problems (*Census S1810, 2023 ACS 1-year estimates, Disability Glossary*). For some in this group, earning an income will be difficult at every stage of their life, making affording accessible housing and maintaining access to necessary services more challenging. While respondents to our 2025-2029 Consolidated Plan survey reported that there are appropriately accessible housing units in Maine, there simply aren’t enough of them for the population that requires them.

To the extent information is available, describe the facilities and services that assist persons who are not homeless but who require supportive housing, and programs for ensuring that

persons returning from mental and physical health institutions receive appropriate supportive housing

For persons experiencing mental and physical disabilities, Maine has a continuum of service-enhanced housing opportunities ranging from independent living options to intensive group living facilities such as ICF/DD facilities and group homes. Maine's Department of Health and Human Services (DHHS) handles licensing, funding and oversight, and usually administers services through independent providers rather than direct facility operations.

A DHHS effort to create a statewide network of community-based residential options has been underway for more than two decades. MaineHousing's primary contribution has been to provide development capital, technical assistance and rental assistance.

Maine's Department of Labor's Bureau of Rehabilitation Services offers supports such as individual counseling, guidance and vocational assessment, mobility instruction, training and job placement, independent living services and advocacy for Maine residents experiencing disabilities.

Nonprofit Maine organizations providing relevant advocacy services include the Developmental Disability Council, Disability Rights Center, and Legal Services for Maine Elders.

Describe programs for ensuring that persons returning from mental and physical health institutions receive appropriate supportive housing

Pursuant to a consent decree stemming from class-action lawsuits regarding the state's special needs institutions more than two decades ago, Maine DHHS was required to establish community-based options (including residential, as needed) for persons affected by mental illness or developmental/physical disabilities. Case managers, who are typically employed by non-profit service agencies, work with clients to identify and secure services.

The Bridging Rental Assistance Program (BRAP) is state-funded and prioritizes providing expedited Supported Housing vouchers to persons leaving psychiatric institutions.

Section 811 is a federally subsidized rental assistance program, administered by DHHS, making available integrated affordable housing and support services for persons experiencing disabilities.

Additionally, MaineHousing provides project-based rental assistance to make the rents affordable to extremely low-income households. The Office of Aging and Disability Services oversees the provision of services that the client is eligible to receive.

Specify the activities that the jurisdiction plans to undertake during the next year to address the housing and supportive services needs identified in accordance with 91.215(e) with respect to persons who are not homeless but have other special needs. Link to one-year goals. 91.315(e)

Please refer to section SP-60.

For entitlement/consortia grantees: Specify the activities that the jurisdiction plans to undertake during the next year to address the housing and supportive services needs identified in accordance with 91.215(e) with respect to persons who are not homeless but have other special needs. Link to one-year goals. (91.220(2))

Not Applicable.

MA-40 Barriers to Affordable Housing – 91.310(d)

Negative Effects of Public Policies on Affordable Housing and Residential Investment

State and federal public policies are instrumental in shaping affordable housing and residential investment. In most cases, these policies aim to provide benefits and incentives to create affordable housing, however, consequently a number of these policies negatively impact the cost of developing, maintaining, and improving affordable housing. Most concerning are federal funding regulatory requirements such as Davis Bacon, Section 3, and Build America Buy America (“BABA”), which can increase costs for many affordable housing programs and projects. For example, with respect to BABA there may be circumstances where certain types of essential equipment (such as cold weather heat pumps) are not readily available in the United States, which could result in increased costs, delays or use of inferior products to meet the requirements. Additionally, local regulatory and process barriers, including community development standards, discourage the creation and preservation of affordable housing and create complicated land use issues which impede development.

Beyond regulatory impediments, scarcity of federal and public resources attribute to the negative effects on affordable housing and residential investment. MaineHousing continues to see an exceptionally high level of competition for 9% and 4% Low Income Housing Tax Credits and there is a similar scarcity of resources with Housing Choice Vouchers (HCV). With stagnant budgets and rising rents in the HCV Program, recipients are struggling to find eligible units. Additionally, with a rise in demand for assistance, federal programs such as LIHEAP, that remain funded at the same level, are falling short in keeping housing and housing-related costs affordable for income-qualified households in Maine. Considering the record rate of inflation observed during the past three years, the effectiveness of a given level of funding is necessarily diminished relative to the pre-pandemic period.

A final barrier is reliable information dissemination to renters, homeowner, and landlords. This is a perverse side effect of the information-rich modern media environment, which provides ready access information but no one information channel (e.g. television news, print news, social media, podcasts, etc.) can be relied on to deliver a consistent message to the public. This means it is more difficult to inform households of programs they may be eligible for; more difficult to protect the public from misinformation; more difficult to educate homeowners and landlords about program benefits; and more difficult to educate the public about the benefits of affordable housing development in their communities.

MA-45 Non-Housing Community Development Assets -91.315(f)

Introduction

Economic Development Market Analysis

Business Activity

Business by Sector	Number of Workers	Number of Jobs	Share of Workers %	Share of Jobs %	Jobs less workers %
Agriculture, Mining, Oil & Gas Extraction	16,849	7,840	2	1	-1
Arts, Entertainment, Accommodations	53,643	51,798	8	9	1
Construction	51,887	34,234	8	6	-2
Education and Health Care Services	187,524	167,373	27	30	3
Finance, Insurance, and Real Estate	43,910	30,947	6	6	0
Information	11,148	7,988	2	1	-1
Manufacturing	61,842	52,680	9	10	1
Other Services	30,736	16,936	4	3	-1
Professional, Scientific, Management Services	65,519	46,480	10	8	-2
Public Administration	30,400	23,683	4	4	0
Retail Trade	87,852	77,373	13	14	1
Transportation and Warehousing	29,167	17,605	4	3	-1
Wholesale Trade	12,893	19,155	2	3	1
Total	683,370	554,092	--	--	--

Table 38- Business Activity

Alternate Data Source Name:

ACS 2018-2022

Data Source Comments:

Labor Force

Total Population in the Civilian Labor Force	714,333
Civilian Employed Population 16 years and over	683,370
Unemployment Rate	4.00
Unemployment Rate for Ages 16-24	9.40
Unemployment Rate for Ages 25-65	3.20

Table 39 - Labor Force

Alternate Data Source Name:

ACS 2018-2022

Data Source Comments:

Occupations by Sector	Number of People
Management, business and financial	276,675
Farming, fisheries and forestry occupations	16,849
Service	112,073
Sales and office	139,407
Construction, extraction, maintenance and repair	54,995
Production, transportation and material moving	83,371

Table 40 – Occupations by Sector

Alternate Data Source Name:

ACS 2018-2022

Data Source Comments:

Travel Time

Travel Time	Number	Percentage
< 30 Minutes	449,014	67%
30-59 Minutes	175,585	26%
60 or More Minutes	45,572	7%
Total	670,171	100%

Table 41 - Travel Time

Alternate Data Source Name:

ACS 2018-2022

Data Source Comments:

Education:

Educational Attainment by Employment Status (Population 16 and Older)

Educational Attainment	In Labor Force		Not in Labor Force
	Civilian Employed	Unemployed	
Less than high school graduate	18,231	1,683	17,361
High school graduate (includes equivalency)	148,443	7,620	57,414
Some college or Associate's degree	165,057	4,723	45,521

Educational Attainment	In Labor Force		Not in Labor Force
	Civilian Employed	Unemployed	
Bachelor's degree or higher	210,795	3,952	30,046

Table 42 - Educational Attainment by Employment Status

Alternate Data Source Name:

ACS 2018-2022

Data Source Comments:

Educational Attainment by Age

	Age				
	18–24 yrs	25–34 yrs	35–44 yrs	45–65 yrs	65+ yrs
Less than 9th grade	829	1,700	1,891	6,771	9,325
9th to 12th grade, no diploma	10,495	5,849	5,226	15,883	13,115
High school graduate, GED, or alternative	39,467	44,297	39,559	129,905	97,834
Some college, no degree	41,197	34,325	31,629	70,920	51,336
Associate's degree	4,984	16,914	18,743	43,472	24,005
Bachelor's degree	12,602	45,656	40,289	75,147	53,641
Graduate or professional degree	598	15,625	23,290	45,382	44,232

Table 43 - Educational Attainment by Age

Alternate Data Source Name:

ACS 2018-2022

Data Source Comments:

Educational Attainment – Median Earnings in the Past 12 Months

Educational Attainment	Median Earnings in the Past 12 Months
Less than high school graduate	31,395
High school graduate (includes equivalency)	36,542
Some college or Associate's degree	42,608
Bachelor's degree	53,346
Graduate or professional degree	69,463

Table 44 – Median Earnings in the Past 12 Months

Alternate Data Source Name:

ACS 2018-2022

Data Source Comments:

Based on the Business Activity table above, what are the major employment sectors within the state?

Education and Health Care Services is by far the largest employment sector in Maine, followed by Retail Trade, then Manufacturing, which is followed by Arts, Entertainment, and Accommodations in a very close fourth place.

Describe the workforce and infrastructure needs of business in the state.

In 2023, according to the US Bureau of Labor Statistics, the top five occupations in Maine were Retail Salespersons, Home Health & Personal Care Aides, Registered Nurses, General and Operations Managers, and Cashiers. However, in addition to Managers, the top five growth occupations during the 2018-2023 period included Social Services, Housekeeping, Childcare, and Truck Drivers. The employment sectors support a general shift away from manufacturing in Maine towards care work and public service. There also appears to be a moderate shift away from lower-skill employment in retail and hospitality towards higher-skill management positions, likely in the same sectors and driven by technological change.

Since the nominal counts of jobs and workers in Table 13 come from different data sources, the nominal deficit of workers-to-jobs cannot be relied upon as a valid indicator. However, the relative shares of total workers and total jobs are informative. It is notable that Arts, Entertainment, & Accommodations, Education & Health Care Services, Retail Trade, and Wholesale Trade are the sectors with larger share of jobs than workers. This indicates a labor shortage for those sectors. On the other hand, in sectors where self-employment is common it may be misleading to view a larger share of workers than jobs as indicative of a labor surplus.

MaineHousing's 2024 Consolidated Plan Survey asked respondents what public infrastructure was most needed in their community, allowing for the selection of up to three choices. More than 74% of respondents identified public transportation as a top priority. The next two top choices were investments in climate resilience and energy efficiency (50%) and public restrooms (35%). Public water & sewage, broadband access, and handicap accessibility features all garnered about 25% support.

Describe any major changes that may have an economic impact, such as planned public or private sector investments or initiatives that have affected or may affect job and business growth opportunities during the planning period. Describe any needs for workforce development, business support or infrastructure these changes may create.

Two changes that are already coming down the pike will have major economic impacts in the near future, and a third is a potential opportunity for the Maine economy. First, in response to the 2023 State of Maine Housing Study, the state has set ambitious housing production goals that will amount to doubling the rate of housing production in some regions. If these goals are to be achieved, Maine will need to support a significant growth in workforce development for the construction sector, but also in all of trades and public services that support construction services. This additional housing will simultaneously increase the need for public infrastructure projects to support the additional homes and growing communities, including water, sewer, waste disposal, roads, and many other civil planning projects.

Second, the Greenhouse Gas Reduction Fund, created as part of the Inflation Reduction Act, is expected to finance numerous housing and infrastructure projects in Maine aimed at addressing the climate crisis while promoting U.S. energy independence. Although some of the associated work and workforce development will dovetail very efficiently with that of the housing goals, this will also increase labor demand for the energy industries, especially solar and wind energy, as well as all the trades associated with electrification.

Finally, the requirements of the Build America/Buy America Act (BABA) may present an opportunity for new growth in the manufacturing industry in Maine. If the workforce and capital can be made available, entrepreneurial Mainers may begin new ventures focused on supplying a greater share of the building materials needed for the housing and other infrastructure that we hope to create.

How do the skills and education of the current workforce correspond to employment opportunities in the state?

Younger generations of Mainers are, on average, more highly educated than their parents (Table 48). This indicates an increasingly skilled workforce. However, an increasingly aged population creates new demand for labor in health and home care services, in addition to reducing the labor force as residents retire. The former is already evident in Table 43, where the shortage of workers relative to jobs is most severe in the Education and Health Care Services sector. Construction and Management Services both appear to have a surplus of workers, but this could be an artifact of self-employment in the former case and remote work in the latter. In all other sectors, the workforce is relatively well balanced with available employment opportunities.

Describe current workforce training initiatives supported by the state. Describe how these efforts will support the state's Consolidated Plan.

The Maine Jobs and Recovery Plan (MJRP) has invested in a variety of new workforce training initiatives and expansions to existing programs including no- and low-cost education and job training, tuition support, paid work experiences for young people, supporting industry partnerships, community-based career counseling, and peer supports. Some of Maine's greatest workforce assets include the following:

- *State Economic Strategy* that supports clean tech job creation through apprenticeship.
- *Creation of Dirigo Business Incentives program*, which enables Maine manufacturers to receive \$2,000 per worker enrolled in an eligible training program, such as apprenticeship.
- *Upgraded Career and Technical Education (CTE) programs* through a \$20 million investment in infrastructure and equipment, which strengthens pathways to advanced manufacturing and trades for high school students.
- *University-industry partnerships* at UMaine with \$113 million in federal funds for R&D, equipment, and facilities to support commercialization of new technologies.
- *Partnerships with labor and industry* that have resulted in apprenticeships with 130 sponsors.
- *Creation of free tuition* at Maine's community colleges, a \$20 million investment that which provides 8,000 Mainers with no-cost vocational training in manufacturing, trades, and other critical sectors.
- *Expansion of short-term workforce training* through a \$75 million grant from the Alford Foundation.
- *Doubling of Maine Apprenticeship* with a \$12.3 million from the MJRP.
- *Strengthening of safety net* for workers through State adoption of paid family and medical leave.

State supported workforce training initiatives include:

- The Competitive Skills Scholarship Program, which provides funding and support services to pursue two and four-year degree programs or employer recognized credentials leading to high-wage, in-demand jobs in Maine to residents meeting certain eligibility criteria.

- Registered Apprenticeships and Pre-Apprenticeship programs. These programs combine on-the-job training with classroom instruction, allowing participants to earn while they learn. They are available in various industries including skilled trades, healthcare, manufacturing, and technology. Pre-Apprenticeship combines classroom education with job training to help students prepare for registered apprenticeships and future careers.
- CTE programs offer specialized training in various sectors including skilled trades, healthcare and technology.

These efforts and initiatives are critical to supplying the workforce needed to carry out the various components of Maine's Consolidated Plan.

Describe any other state efforts to support economic growth.

Maine's Department of Economic and Community Development offers a number of programs through federal funding to stimulate economic growth. They offer loans, tax credit programs, the creation of business opportunity zone programs and more.

The Maine Technology Institute (MTI) provides funding for new ideas, products, and methods with the potential to grow and diversify Maine's economy and increase quality jobs. MTI also focuses on creating the infrastructure to encourage innovation.

The Maine Jobs & Recovery Plan includes a suite of specific initiatives and programs to support not just recovery from the pandemic but sustained economic growth. There is a Workforce Transportation Program to pilot new ways of connecting workers with employers. There is a Small Business Health Insurance Premium Relief Program, which aims to sustain profitability for small businesses. There is even funding for capital infrastructure improvements in state parks that will add to the public infrastructure assets in Maine, which attract residential migration and business investment.

The programs offered by MaineHousing and DECD are also a fundamental part of the state's effort to support economic growth through affordable housing development, preservation and rehabilitation, home repair, and the expansion and improvement of public infrastructure.

Discussion

See above.

MA-50 Needs and Market Analysis Discussion

Are there areas where households with multiple housing problems are concentrated? (include a definition of "concentration")

Definition: A county has a concentration of housing problems if greater than one eighth (12.5%) of households in the county have a severe housing problem.

The following counties have a concentration of housing problems: Androscoggin County, Cumberland County, Oxford County, Piscataquis County, Somerset County, Waldo County, Washington County, and York County. Of those, Cumberland and Piscataquis Counties have the greatest concentrations, each with approximately 13.6% of households experiencing a severe housing problem.

Are there any areas in the jurisdiction where racial or ethnic minorities or low-income families are concentrated? (include a definition of "concentration")

Definitions: For the purpose of this discussion, we consider an area to have a concentration of racial or ethnic minorities if the population is estimated to be less than 90% white and non-Hispanic. We consider an area to have concentration of low income families if more than 30% of households have incomes below the poverty line.

The following is list of jurisdictions that have a concentration of racial or ethnic minorities, according to Census data from the 2018-2022 ACS 5-year sample:

- Bar Harbor CDP, Maine
- Freeport CDP, Maine
- Island Falls CDP, Maine
- Lewiston city, Maine
- Milbridge CDP, Maine
- Portland city, Maine
- South Portland city, Maine
- Thomaston CDP, Maine
- Houlton Maliseet Reservation, ME
- Indian Township Reservation, ME
- Penobscot Reservation and Off-Reservation Trust Land, ME
- Pleasant Point Reservation, ME

The following is list of jurisdictions that have a concentration of low-income families, according to Census data from the 2018-2022 ACS 5-year sample:

- Anson CDP, Maine
- Damariscotta CDP, Maine
- Danforth CDP, Maine
- Machias CDP, Maine

- Norway CDP, Maine
- Orono CDP, Maine
- Oxford CDP, Maine
- Patten CDP, Maine
- South Paris CDP, Maine
- Unity CDP, Maine

What are the characteristics of the market in these areas/neighborhoods?

The jurisdictions with concentrations of low-income families all share the market characteristics of being smaller communities in less-urban areas of Maine. The jurisdictions containing concentrations of racial or ethnic minorities are much more varied. The four tribal reservations have the highest concentrations of non-white populations, which are sovereign territories but are eligible for many state or federal grants and programs. The Portland, South Portland, Lewiston and Freeport are urban centers with relatively high population density and availability of community assets. On the other hand, Thomaston, Island Falls, and Milbridge are very small communities in more remote areas of the state. And Bar Harbor is a unique case, being a remote and fairly small town but also the center of a thriving seasonal tourism market.

Are there any community assets in these areas/neighborhoods?

Although Portland, South Portland, Lewiston, Freeport, and Bar Harbor all have a reasonably robust set of community assets, those resources are strained in the current economic environment. The remainder of the identified areas have much more limited assets available, although each has its own strengths. For example, Thomaston has relatively strong employment due to its proximity to the Maine State Prison and the surrounding associated businesses. Similarly, Machias has the University of Maine campus, providing unique employment and education opportunities.

Are there other strategic opportunities in any of these areas?

Yes and they vary by the community's history, geography, and community assets.

MA-60 Broadband Needs of Housing occupied by Low- and Moderate-Income Households - 91.210(a)(4), 91.310(a)(2)

Describe the need for broadband wiring and connections for households, including low- and moderate-income households and neighborhoods.

As a state, Maine has been focusing on issues of connectivity and digital equity. According to the Maine Connectivity Authority, there are more than 40,000 locations across the state without connection to high-speed broadband.

In 2024, MaineHousing worked with the Maine Connectivity Authority to survey the state's affordable housing properties to better understand their digital connectivity status, and is now helping develop a plan for improvements in this area.

The need is significant: the National Telecommunications and Information Administration (NTIA) estimates that 89% of Mainers identify as a population likely to be most impacted by the "digital divide" (*State of Maine Digital Equity Plan*, Maine Connectivity Authority): These audiences include: older adults, low-income households, people living in rural areas, veterans, individuals with a disability, individuals with a language barrier, individuals who are members of a racial or ethnic minority group, and people who are incarcerated.

The state's published digital equity plan (which MaineHousing has been part of developing) is based on six goals:

1. Increase Broadband Access
2. Improve the Affordability of Internet Service.
3. Ensure Access to Affordable Devices (Desktops, laptops, tablets) & Technical Support
4. Improve Mainers' Digital Skills
5. Help Mainers Stay Safe Online
6. Make it Easier to Access Resources & Programs Online

These goals will guide the state in implementing its share of the funds it received through The Broadband Equity, Access, and Deployment (BEAD) Program. This program is funded through the Bipartisan Infrastructure Law and will provide Maine with a \$272 million grant that will bring critical resources to fund broadband infrastructure and digital equity for the entire state including in affordable housing.

Describe the need for increased competition by having more than one broadband Internet service provider serve the jurisdiction.

Data available from the Federal Communications Commission does not facilitate mapping out the number of available broadband providers. However, we do know that there is significant spatial variation in the availability of mobile broadband coverage. Although this coverage is near to 100% throughout the southern regions of Maine, it fades all the way to 0% in the northwestern region.

As a more general matter, it is observationally the case the many households only have one broadband provider available to them. This presents a classic case of market power, wherein the provider has an incentive to inflate prices even at the cost of serving fewer customers. Although there has been recent progress as a new provider, Fidium Fiber Internet, invests in areas that previously had a single provider, the issue of a single provider is likely to remain an issue and cause price inflation in many areas of the state.

MA-65 Hazard Mitigation - 91.210(a)(5), 91.310(a)(3)

Describe the jurisdiction's increased natural hazard risks associated with climate change.

Climate change has begun to affect the entire state of Maine. This situation is exacerbated by the fact that Maine has one of the longest coastlines in America, totaling approximately 3,478 miles, making coastal tidal flooding an increasing issue in many localities, including the state's population centers.

According to the Maine Climate Council, Maine has already experienced eight inches of sea level rise (SLR). Expectations for future SLR in Maine are 1.5 more feet by 2050 and four more feet by 2100. For context, one foot of SLR alone increases nuisance flooding over 15 times. SLR will affect Maine's entire coast and tidal rivers, causing erosion in coastal beaches, dunes, salt marshes and bluffs; coastal groundwater contamination; and loss of 40 - 75% of dry beach area (*Maine Climate Plan: Climate Impacts*, Maine Climate Council).

In Maine, we are seeing warmer temperatures, diminished winters, summer weather extending into the fall, increasing annual precipitation in conjunction with a shift towards more extremes, rising sea level along the coast, and warming waters in the Gulf of Maine. These changes in turn affect both terrestrial and marine ecosystems and environments, and carry profound adaptation and management challenges for agriculture, forestry, fisheries, aquaculture, outdoor tourism, as well as human, animal, and ecosystem health.

Describe the vulnerability to these risks of housing occupied by low- and moderate-income households based on an analysis of data, findings, and methods.

At present, there is a lack of research addressing housing vulnerability specific to low- and moderate-income households in Maine. Maine Emergency Management Agency is engaged in an effort to map the vulnerability of affordable housing units in the state. However, flood risk is greatest in many of the most populated areas of Maine and regardless of which housing stock is damaged or lost, the impacts on housing markets will be felt by low- and moderate-income households. The potential loss of housing stock is a serious threat to progress on housing affordability.

Strategic Plan

SP-05 Overview

Strategic Plan Overview

This strategic plan identifies how MaineHousing and the Department of Economic and Community development will utilize its various resources to meet the needs of Maine citizens during the next five years.

Priority Needs:

- Improve and Preserve the Quality of Housing
- Expand Affordable Housing Opportunities
- Help Maine People Attain Housing Stability
- Improve Economic Opportunity
- Improve Public Infrastructure

Resources in 2024: (numbers in parenthesis represent projections for the remainder of the Consolidated Plan)

- CDBG: \$11,808,636 (\$47,234,544)
- HOME: \$3,893,165 (\$15,572,660)
- HTF: \$3,144,833 (\$12,579,332)
- ESG: \$1,391,803 (\$5,367,212)

Geographic priorities are specific to each housing program offered and limited according to funding source restrictions and identified needs. Goals: Over the next five years, the State intends to provide funding for Tenant-Based Rental Assistance and for new, refinanced, and rehabilitated Multifamily Housing.

The State CDBG Program will continue to provide resources to the eligible activities that communities have identified as having the most impact: Public Infrastructure, Economic Development, and Housing.

SP-10 Geographic Priorities – 91.315(a)(1)

Geographic Area

Table 45 - Geographic Priority Areas

1	Area Name:	State Of Maine
	Area Type:	State Of Maine
	Other Target Area Description:	State Of Maine
	HUD Approval Date:	
	% of Low/ Mod:	
	Revital Type:	
	Other Revital Description:	
	Identify the neighborhood boundaries for this target area.	
	Include specific housing and commercial characteristics of this target area.	
	How did your consultation and citizen participation process help you to identify this neighborhood as a target area?	
	Identify the needs in this target area.	
	What are the opportunities for improvement in this target area?	
	Are there barriers to improvement in this target area?	

General Allocation Priorities

Describe the basis for allocating investments geographically within the jurisdiction (or within the EMSA for HOPWA)

ESG funds are distributed statewide based on an annual application for funding. An assessment of community need is done when new shelters and homeless service providers wish to apply for funding. Generally, need is apparent in all parts of the state, and new providers are granted funds if compliance with other requirements is met.

The STEP program is offered statewide, referrals are received through Maines Coordinated Entry System.

Income eligible citizens, Community Housing Development Organizations, and housing developers may apply for grants or loans from anywhere in Maine.

MaineHousing’s resource allocation process is based on housing needs among priority groups, e.g., people who are homeless. Resources are maximized to the extent possible. For example, Low Income Housing Tax

Credits are distributed with HOME funds through Community Housing Development Organizations (CHDOs).

SP-25 Priority Needs – 91.315(a)(2)

Priority Needs

Table 46 – Priority Needs Summary

1	Priority Need Name	Help Maine People Attain Housing Stability
	Priority Level	High
	Population	Extremely Low Low Large Families Families with Children Elderly Rural Chronic Homelessness Individuals Families with Children Mentally Ill Chronic Substance Abuse veterans Persons with HIV/AIDS Victims of Domestic Violence Unaccompanied Youth Elderly
	Geographic Areas Affected	State Of Maine
	Associated Goals	Provides Rapid Re-Housing Support Emergency Shelter Operations & Services
	Description	Housing stability, the ability of Maine people to obtain and maintain affordable housing, is essential to MaineHousing’s ongoing efforts to ensure quality affordable housing. MaineHousing will implement strategies to reduce homeowner foreclosure rates, to lower homeowner heating costs through energy assistance and weatherization, to provide support for low income renters who are barely able to pay for housing, and to help individuals and families who are homeless to obtain and maintain stable housing.
	Basis for Relative Priority	MaineHousing’s Strategic Plan recognizes that recognizing that helping Maine people attain housing stability is a priority. MaineHousing is committed to assisting homeless individuals and families.
2	Priority Need Name	Expand Affordable Housing Opportunities
	Priority Level	High

	Population	Extremely Low Low Moderate Middle Large Families Families with Children Elderly
	Geographic Areas Affected	State Of Maine
	Associated Goals	Expand Affordable Housing Opportunities
	Description	Maine’s existing inventory of affordable housing does not meet current need. MaineHousing will use the Low Income Housing Tax Credit program to expand and improve the supply of affordable housing. MaineHousing will continue its efforts to control the per-unit cost of new development. MaineHousing will also employ new financing mechanisms to expand the supply of affordable multifamily and single family housing through the Rural Affordable Rental Housing Program and the Affordable Homeownership Program. Additionally, MaineHousing will seek new and stretch existing rental subsidies. DECD will provide resources to communities to redevelop existing structures into housing and create new units of affordable housing via partnerships with CHDOs and other community-based not-for-profit organizations
	Basis for Relative Priority	MaineHousing’s Strategic Plan recognizes that expanding the supply of affordable housing is a high priority. The Needs Assessment illustrates that affordability of housing continues to be a significant concern in many areas of the state.
3	Priority Need Name	Improve and preserve the Quality of Housing
	Priority Level	High
	Population	Extremely Low Low Moderate Middle Large Families Families with Children Elderly
	Geographic Areas Affected	State Of Maine
	Associated Goals	Improve and Preserve Quality of Housing

	Description	Maine has the oldest housing stock in the nation and safe, affordable housing is critical to an individual's health and productivity.
	Basis for Relative Priority	
4	Priority Need Name	Improve Public Infrastructure
	Priority Level	High
	Population	Extremely Low Low Moderate
	Geographic Areas Affected	State Of Maine
	Associated Goals	Improve Public Infrastructure
	Description	The Public Infrastructure Grant (PI) Program provides gap funding for local infrastructure activities, which are part of a community development strategy leading to future public and private investments.
	Basis for Relative Priority	
5	Priority Need Name	Improve Economic Opportunity
	Priority Level	High
	Population	Extremely Low Low Moderate Large Families Families with Children Elderly Non-housing Community Development
	Geographic Areas Affected	State Of Maine
	Associated Goals	Improve Economic Opportunity
	Description	Assist identified businesses in the creation/retention of jobs for low-and moderate-income persons.

Basis for Relative Priority	
--	--

Narrative (Optional)

The table above shows priority needs for the State of Maine.

The needs identified as “high” that could be addressed with federal funding are identified in the table.

SP-30 Influence of Market Conditions – 91.315(b)

Influence of Market Conditions

Affordable Housing Type	Market Characteristics that will influence the use of funds available for housing type
Tenant Based Rental Assistance (TBRA)	Current market conditions have increased the average benefit paid for TBRA, meaning that we are able to help fewer households with a given amount of funding. It has also led to MaineHousing and nearly every PHA in Maine exceeding their budgeted Housing Choice Voucher funds, forcing them to pause the issuance of all new vouchers. The associated market conditions are persistently elevated rates of homelessness, soaring rents due a shortage of units, and slow wage growth that has not kept pace with increasing prices.
TBRA for Non-Homeless Special Needs	Maine’s aging population means that there is increasing demand for services and a shrinking labor force to provide those services. If this demographic situation persists, it will present a challenge for the provision of housing for those with special needs that require services because those services will become more expensive and increasing difficult to geolocate throughout our landscape of smaller towns and rural communities.
New Unit Production	New unit production faces soaring costs of labor and material inputs. It also faces hesitation from smaller Maine communities to allow increasing densification in areas with access to services. This means that new unit production is more costly per unit even as our state attempts to ramp up production in an effort to address historic underproduction. At the same time, it will be extra challenging to efficiently allocate new construction in areas where there is local resistance, even for communities whose local economy desperately needs additional housing.
Rehabilitation	Rehabilitation of existing units also faces soaring costs of labor and material inputs but remains less expensive than new production. It is also less likely to face opposition in smaller Maine communities as the units will not likely create an increased burden on services. Recently, Maine has made new production of units a priority in an effort to increase overall supply and address historic underproduction. At the same time, Maine’s housing stock is quickly aging and becoming obsolete.
Acquisition, including preservation	Acquisition and preservation work are mostly limited by the same market conditions as new unit production.

Table 47 – Influence of Market Conditions

SP-35 Anticipated Resources - 91.315(a)(4), 91.320(c)(1,2)

Introduction

The State of Maine annually receives federal funding from HUD for four formula grant programs of CDBG, ESG, HOME and HTF.

Anticipated Resources

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
CDBG	public - federal	Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services	11,808,636	0	0	11,808,636	47,234,544	DECD through its annual Method of Distribution allocates funds these eligible categories. UGLG then apply based on their community needs.
HOME	public - federal	Acquisition Homebuyer assistance Homeowner rehab Multifamily rental new construction Multifamily rental rehab New construction for ownership TBRA	3,893,165	0	0	3,893,165	15,572,660	MaineHousing allocates HOME funds to new construction, rehabilitation, and financing of multi-family rental projects, as well as to TBRA.

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
ESG	public - federal	Conversion and rehab for transitional housing Financial Assistance Overnight shelter Rapid re-housing (rental assistance) Rental Assistance Services Transitional housing	1,391,803	0	0	1,391,803	5,567,212	MaineHousing provides grants to emergency shelters serving people who are homeless. Grants may be used for shelter operations and rapid re-housing.
HTF	public - federal	Acquisition Admin and Planning Homebuyer assistance Multifamily rental new construction Multifamily rental rehab New construction for ownership	3,144,833	0	0	3,144,833	12,579,332	MaineHousing allocates HOME funds to new construction, rehabilitation, and financing of multi-family rental projects.

Table 48 - Anticipated 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

MaineHousing matches ESG funds with two sources of state funding. The state funding is braided with ESG to fund the ESHAP program as a whole, making the program a \$7.2 million program in 2024. In addition, MaineHousing makes available funding for targeted rapid rehousing and housing problem solving to ESHAP grantees to further support their efforts to prevent and end homelessness.

HOME 25% match requirement will be met with State of Maine DHHS funding for services, as well as interest savings on below market rate loans.

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

Not Applicable

Discussion

Please see above

SP-40 Institutional Delivery Structure – 91.315(k)

Explain the institutional structure through which the jurisdiction will carry out its consolidated plan including private industry, non-profit organizations, and public institutions.

Responsible Entity	Responsible Entity Type	Role	Geographic Area Served
MAINE STATE HOUSING AUTHORITY	Government	Homelessness Non-homeless special needs Ownership Planning Public Housing Rental	State
DEPARTMENT OF ECONOMIC AND COMMUNITY DEVELOPMENT	Government	Economic Development neighborhood improvements public facilities public services	State

Table 49 - Institutional Delivery Structure

Assess of Strengths and Gaps in the Institutional Delivery System

MaineHousing delivers the STEP program with the help of participating homeless shelters. Homeless shelter staff assess clients through the Coordinated Entry system and eligible clients are referred through that system to the STEP Program based on the likelihood that the participant, with the help of STEP, can achieve housing stability within 12-24 months.

ESG funds are awarded to non-profit and municipal subrecipients serving persons experiencing homelessness across the state. Currently, grantees are located in 11 of the 16 Maine counties, with some entities covering persons experiencing homelessness in unrepresented geographic areas. 39 of the current grantees have physical emergency shelter facilities with another 5 offering supportive housing relocation and stabilization services only.

Availability of services targeted to homeless persons and persons with HIV and mainstream services

Homelessness Prevention Services	Available in the Community	Targeted to Homeless	Targeted to People with HIV
Homelessness Prevention Services			
Counseling/Advocacy	X	X	X
Legal Assistance	X	X	X
Mortgage Assistance	X	X	
Rental Assistance	X	X	X
Utilities Assistance	X	X	X

Street Outreach Services			
Law Enforcement	X	X	
Mobile Clinics	X		X
Other Street Outreach Services	X	X	X
Supportive Services			
Alcohol & Drug Abuse	X		X
Child Care	X	X	X
Education	X	X	X
Employment and Employment Training	X	X	X
Healthcare	X	X	X
HIV/AIDS	X	X	X
Life Skills	X	X	X
Mental Health Counseling	X	X	X
Transportation	X	X	X
Other			

Table 50 - Homeless Prevention Services Summary

Describe the extent to which services targeted to homeless person and persons with HIV and mainstream services, such as health, mental health and employment services are made available to and used by homeless persons (particularly chronically homeless individuals and families, families with children, veterans and their families and unaccompanied youth) and persons with HIV within the jurisdiction

MaineHousing uses ESG funds and state resources to give ESHAP grants to agencies to assist persons experiencing homelessness. ESHAP funds were distributed to 44 projects Statewide in 2024, and referral to Mainstream Resources is a minimum criteria. These are defined as federal and state government assistance programs homeless persons may be eligible for, e.g. TANF, SNAP, veterans’ benefits, and MaineCare. ESHAP recipients are also required to provide linkages and access to community resources such as health care, workforce, and educational services to assist guests in achieving housing stability.

The most common housing resources available to homeless persons in Maine include: **Public Housing Authority Resources:** MaineHousing has the most Housing Choice Vouchers available in the state and commits 60% of them for those experiencing homelessness through set aside programs. Other PHAs in the state offer voucher and public housing resources. **ESHAP Shelter Resources:** ESHAP-funded providers serve all populations, including families with children, victims of domestic violence, unaccompanied youth, chronically homeless persons, veterans, and persons with HIV. ESHAP Housing Navigators assess clients and assist them with education, services, support and Mainstream Resource referrals to meet their health, housing, employment, and other basic needs. Navigators are trained in Rent Smart, a tenant education course that is offered to those accessing shelter. Most shelters provide transportation assistance, case management services, and financial management education. **Targeted Rapid Rehousing Program:** This state funded program supports 6 service providers in providing rapid rehousing support. Services include housing relocation and stabilization services as well as short term rental assistance, security deposit assistance, landlord incentives, short term utility assistance, and other move in cost assistance. **Housing Problem Solving Program:** Housing problem solving programming aims to prevent those at risk of homelessness from

entering the homeless service system or to rapidly exit those who have come into shelter. The program pairs staffing with financial assistance to help participants remain in their home or quickly be rehoused in a new home. **Supportive Services for Veteran Families:** SSVF provides case management and supportive services to veterans and their families who are experiencing homelessness or at risk of homelessness. The program is administered statewide. **Public School Resources:** Most homeless students are identified through referrals from school personnel, though some families seek services. A recent legislative bill allocated funds for a pilot program to fund school based housing navigators and rental assistance funds for students experiencing homelessness. **General Assistance:** General Assistance support varies. It can pay for shelter fees and assist with housing payments and/or rent in order to keep people from losing their housing. GA is accessed through municipalities, and often shelters assist in making that connection for guests. **Community Resources:** These include food pantries, soup kitchens, day or drop-in programs, and assistance with obtaining clothing and household goods. **211 Maine:** This statewide service provides information and resources in the areas of health and human services via phone, text, email and a searchable online directory. **CoC Resources:** CoC Program funding supports projects dedicated to serving those experiencing homelessness. Maine's CoC funding is primarily used for PSH vouchers; it also funds RRH and supportive service programs. Access to these programs go through Coordinated Entry.

Describe the strengths and gaps of the service delivery system for special needs population and persons experiencing homelessness, including, but not limited to, the services listed above

Strengths of the system include a collaborative approach to reaching persons experiencing homelessness and providing services. Maine underwent a homeless system redesign and funded a coordinator position in 9 service hubs across the state. These coordinators work in community with the providers on initiatives that strengthen the system and connect those in need of services to access points where they can be assessed for services.

Maine has funded warming shelters over the past three winters with emergency state funding, which has assisted greatly with getting people out of the elements during our harsh winters. The state legislature has passed innovative legislation that provides funding to build and support Housing First projects. These projects will prioritize those experiencing chronic homelessness and will be paired with intensive wraparound services.

Gaps in service delivery have been identified by groups like the MCoC and SHC as well as the Hub Coordinators. One of the biggest is outreach for those experiencing unsheltered homelessness. While current programs aim to reach those outdoors, there is not enough system and staffing capacity to support the need. Reaching rural areas with limited capacity can be a challenge.

There have been efforts to increase shelter capacity in some areas of the state based on increasing need. Additional shelters and beds have been added, with more planned. Creating new shelter, increasing capacity, and creating new housing often lends itself to challenges around NIMBYism, which has caused some planned projects to fail.

Restriction from shelters due to behavioral issues or rule-breaking can result in participants having nowhere to go. There has been some movement among shelters to adopt a more low-barrier sheltering model. Maine

has seen a rise in workforce issues and high staff turnover rates in recent years. There is a need for more outreach workers, peer navigators in shelters, and increased training.

Those experiencing homelessness can face barriers to obtaining housing due to limited voucher/subsidy availability; lack of affordable housing; lack of security deposits; subsidies insufficient to meet market rents; non-participating landlords; housing not meeting HUD housing quality standards; poor credit; a criminal or sex offender background.

Barriers to keeping housing include not being able to reach self-sufficiency at the end of short-term rental assistance as well as limited capacity to provide ongoing support once people are housed. Limited availability of ongoing mental health and substance use services can also impact stabilization in housing.

Transportation is an issue in Maine, and can contribute to service gaps. It is even more challenging in rural areas where there may be limited to no resources for persons to reach the services they need. Recent court decisions have the potential to support the criminalization of homeless behaviors, which can lead to arrest records and fines that further impede people from getting jobs or housing. This issue is particularly difficult for people with mental health/substance use disorders who are penalized for behaviors such as trespassing and/or sleeping in public places.

Students who are homeless and unaccompanied youth face all of the same challenges, but face additional challenges related to enrollment, attendance, and success in school.

The system as a whole would benefit from continued and more robust collaboration among service providers across sectors. We have seen success when groups come together, and hope to harness more opportunities to work in partnership and encourage partnerships to lessen the gap in service delivery.

Provide a summary of the strategy for overcoming gaps in the institutional structure and service delivery system for carrying out a strategy to address priority needs

Continue to support the homeless service hub system and Hub Coordinators in their efforts to bring together municipalities, service providers, and other cross sector collaborators.

Enhance supportive services pre-and-post-housing placement through programs like rapid rehousing.

Increase outreach capacity statewide through grant funding.

Work with the MCoC on an updated plan to end and prevent homelessness focusing on strategies to address homelessness and the needs of sub-populations such as unaccompanied youth and people exiting hospitals and the criminal justice system.

Increase the availability of affordable and safe housing, including Housing First projects supported with wraparound services.

Create a training opportunities for providers and the community to improve outcomes and to educate and reduce stigma about homelessness, mental health and substance use.

Use data to lead planning and program priorities.

Increase the availability of housing vouchers and subsidies.

Increase focus on including people with lived experience in homelessness in the development of homeless policy.

SP-45 Goals Summary – 91.315(a)(4)

Goals Summary Information

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	Expand Affordable Housing Opportunities	2025	2029	Affordable Housing	State Of Maine	Expand Affordable Housing Opportunities	HOME: \$12,000,000 HTF: \$15,000,000	Rental units constructed: 360 Household Housing Unit Rental units rehabilitated: 40 Household Housing Unit
2	Provides Rapid Re-Housing	2025	2029	Homeless	State Of Maine	Help Maine People Attain Housing Stability	HOME: \$5,600,000 ESG: \$3,218,540	Tenant-based rental assistance / Rapid Rehousing: 14500 Households Assisted
3	Support Emergency Shelter Operations & Services	2025	2029	Homeless	State Of Maine	Help Maine People Attain Housing Stability	ESG: \$3,218,540	Homeless Person Overnight Shelter: 25000 Persons Assisted
4	Improve and Preserve Quality of Housing	2025	2029	Affordable Housing	State Of Maine	Improve and preserve the Quality of Housing	CDBG: \$10,000,000	Rental units rehabilitated: 1000 Household Housing Unit Homeowner Housing Rehabilitated: 2000 Household Housing Unit
5	Improve Public Infrastructure	2025	2029	Non-Housing Community Development	State Of Maine	Improve Public Infrastructure	CDBG: \$15,000,000	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 5000 Persons Assisted

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
6	Improve Economic Opportunity	2025	2029	Non-Housing Community Development	State Of Maine	Improve Economic Opportunity	CDBG: \$10,000,000	Jobs created/retained: 150 Jobs Businesses assisted: 500 Businesses Assisted

Table 51 – Goals Summary

Goal Descriptions

1	Goal Name	Expand Affordable Housing Opportunities
	Goal Description	<p>The Rental Loan Program (RLP) provides long-term mortgage financing at attractive interest rates for development of affordable rental housing in projects of five or more units.</p> <p>One goal of the RLP is to provide mortgage financing that enables federal low income housing tax credits to be utilized.</p> <p>Program objectives are:</p> <ul style="list-style-type: none"> • Maximize use of tax exempt bonds to develop affordable housing. • Provide affordable mortgage financing that enables developers to utilize low income housing tax credits. • Provide below-market, 30 year fixed rate notes that enable project viability. • Provide capital for preservation of existing rental housing. <p>This program is a companion to the Low Income Tax Credit (LIHTC) program, and provides subsidized financing to enable use of tax credits. Administrative guidance for the Rental Loan Program is provided through the Rental Loan Program Guide, which is available at www.mainehousing.org. Administrative guidance for the Low Income Housing Tax Credit Program is provided through a rule making process which is required to establish the Allocation of State Ceiling for Low Income Housing Tax Credit. Subsidy comes from FedHOME and HTF funds.</p>

2	Goal Name	Provides Rapid Re-Housing
	Goal Description	<p>Stability through Engagement Program (STEP)</p> <p>STEP is designed to provide short-and-medium-term rental assistance for up to 24 months to help individuals and families across the state achieve housing stability. STEP focuses on rapidly re-housing people who are receiving services from a homeless shelter grantee of the Emergency Shelter and Housing Assistance Program. Maine’s Coordinated Entry System make referrals to the STEP Program.</p> <p>Housing Relocation and Stabilization Services</p> <p>MaineHousing provides funding through the Emergency Shelter and Housing Assistance Program (ESHAP), which, in part, funds housing relocation and stabilization services. Agencies receiving funding employ trained housing navigators to assist participants in learning and gaining valuable skills that will meet their health, housing, employment and other basic needs in order to overcome barriers to obtaining and maintaining housing. Housing Navigators help program participants develop and work on goals as part of a Housing Stability Plan, and connect participants with appropriate services and support.</p> <p>Navigators assist program participants in the following areas:</p> <ul style="list-style-type: none"> • Assessment of housing barriers, needs, and preferences • Development of an Action Plan for locating housing • Housing search support, including assistance with submitting rental applications, understanding leases, and negotiating with owners • Assistance with obtaining utilities and making moving arrangements • Coordination of resources and services to obtain federal, state, and local benefits • Information and referrals to other providers <p>Long term housing stability planning, including development of an individualized housing and service plan to accomplish permanent housing stability</p>

3	Goal Name	Support Emergency Shelter Operations & Services
	Goal Description	<p>MaineHousing provides funding through the Emergency Shelter and Housing Assistance Program (ESHAP), which, in part, funds emergency shelter operations. Funding may be used by subrecipients for:</p> <ul style="list-style-type: none"> • Shelter operations • Essential shelter services • HMIS data collection <p>Maine’s emergency shelters</p> <ul style="list-style-type: none"> • Provide a safety net to help homeless individuals and families by offering temporary shelter to meet their basic needs; • Support successful rapid re-housing and; • Help homeless individuals and families resolve their housing crisis and remove barriers to housing stability. <p>Shelters provide a safety net, helping people get off the streets and limiting their exposure to the elements. Shelter personnel also assess their immediate needs for medical, mental health and substance use treatment. They connect homeless individuals and families with mainstream resources and provide essential services including case management. Shelter services decrease the short-term costs to municipalities (e.g. ambulance, fire, etc.) and help increase the life expectancy and quality of life for individuals.</p> <p>Shelter guests are encouraged to participate in programming and services with the goal of obtaining and maintaining stable housing, thus reducing on-going shelter costs.</p>
4	Goal Name	Improve and Preserve Quality of Housing
	Goal Description	<p>DECD through the Home Repair Network Program (HRN) will provide funding statewide to address housing quality problems of low- and moderate-income persons. This program will provide housing rehabilitation services administered on a regional basis throughout Maine.</p> <p>Eligible activities under the HRN Program are rehabilitation of occupied or vacant single-family or multi-family housing units, demolition, same site replacement housing, provision of potable water and sewer, energy conservation, removal/mitigation of lead-based paint, asbestos, radon, or other hazardous material, removal of architectural barriers and the Critical Access Ramp Program.</p> <p>DECD will also provide funding for Multi-Family rehabilitation through the Housing Assistance Grant program.</p>

5	Goal Name	Improve Public Infrastructure
	Goal Description	DECD will provide funding to improve critically important sewer/water infrastructure and Downtown revitalization.
6	Goal Name	Improve Economic Opportunity
	Goal Description	DECD will provide funding to support this goal through the Business Assistance and Micro-Enterprise programs.

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 91.315(b)(2)

The one-year goal for HOME includes the support of 150 TBRA units and construction of 80 multifamily housing units.

SP-50 Public Housing Accessibility and Involvement – 91.315(c)

Need to Increase the Number of Accessible Units (if Required by a Section 504 Voluntary Compliance Agreement)

N/A

Activities to Increase Resident Involvements

N/A

Is the public housing agency designated as troubled under 24 CFR part 902?

N/A

Plan to remove the ‘troubled’ designation

MaineHousing is willing to assist troubled Public Housing Authorities with the goal of having their troubled designation removed. MaineHousing will work with HUD and provide technical assistance to the troubled PHA, including the administration of vouchers if needed.

SP-55 Barriers to affordable housing – 91.315(h)

Barriers to Affordable Housing

State and federal public policies are instrumental in shaping affordable housing and residential investment. In most cases, these policies aim to provide benefits and incentives to create affordable housing, however, consequently a number of these policies negatively impact the cost of developing, maintaining, and improving affordable housing. Most concerning are federal funding regulatory requirements such as Davis Bacon, Section 3, and Build America Buy America (BaBa), which can increase costs for many affordable housing programs and projects. For example, with respect to BABA there may be circumstances where certain types of essential equipment (such as cold weather heat pumps) are not readily available in the United States, which could result in increased costs, delays or use of inferior products to meet the requirements. Additionally, local regulatory and process barriers, including community development standards, discourage the creation and preservation of affordable housing and create complicated land use issues which impede development. Â

Beyond regulatory impediments, scarcity of federal and public resources attribute to the negative effects on affordable housing and residential investment. MaineHousing continues to see an exceptionally high level of competition for 9% and 4% Low Income Housing Tax Credits and there is a similar scarcity of resources with Housing Choice Vouchers (HCV). With stagnant budgets and rising rents in the HCV Program, recipients are struggling to find eligible units. Additionally, with a rise in demand for assistance, federal programs such as LIHEAP, that remain funded at the same level, are falling short in keeping housing and housing-related costs affordable for income-qualified households in Maine. Â Considering the record rate of inflation observed during the past three years, the effectiveness of a given level of funding is necessarily diminished relative to the pre-pandemic period.

Strategy to Remove or Ameliorate the Barriers to Affordable Housing

Addressing the barriers imposed by BABA and resource scarcity is mostly a matter of legislative advocacy, on which MaineHousing continues to work proactively with the Governor's Office and in both the state and federal legislative chambers. However, it is also a matter of public opinion. In 2024 MaineHousing Executive Director Daniel Brennan wrote a powerful op-ed illustrating who affordable housing is for, helping to dispel myths, disinformation, and stigma around affordable housing development. MaineHousing plans to develop an affordable housing awareness campaign around this same narrative, sharing profiles of actual residents of affordable housing developments and their stories.

A strategy to address the final barrier, one that MaineHousing has already begun to implement, is to diversify our educational and marketing efforts. For example, partnering with community organizations to offer program information directly to marginalized communities. Also, in 2024 MaineHousing began expanding its in-person marketing activities, reaching Mainers out in the community rather than remaining mostly within digital and traditional marketing spaces. The largest such event to date was Homeownership Day at the Seadogs in June of 2024.

Two other strategies take a more direct approach to addressing the same barrier. One is landlord incentives to increase housing unit participation with Housing Choice Vouchers and the STEP program. The second is the Housing Problem Solving program, which focuses a small portion of resources at local shelters towards

supporting households at risk of eviction. The latter often amounts to offering information and expertise in navigating the available options.

SP-60 Homelessness Strategy – 91.315(d)

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

Maine DHHS PATH-funded outreach workers reach out statewide to homeless youth and adults. In addition, there are a handful of community based outreach programs in various parts of the state. The goal of outreach is to engage homeless individuals, assess and determine their eligibility for MaineCare and other services, and transition them to a community provider for ongoing assistance. An initial assessment is conducted to determine their immediate needs and health care concerns. Navigators work with local law enforcement, 211, General Assistance offices, faith-based organizations, libraries, and other not-for-profits, such as Community Action Agencies, to help identify those who are homeless. PATH providers are also a Coordinated Entry Access Point, meaning that they can assess clients with the coordinated assessment in order to place them on the prioritization.

The Maine CoC recently fully implemented the Coordinated Entry System which provides a continuum-wide system for referring homeless persons and families to the most appropriate housing and services. The referral stage begins once a person has been assessed by a Coordinated Entry Access Point using the uniform assessment tool and has been added to the centralized prioritization list. Maine currently has approximately 100 CE Access Points, allowing for statewide coverage and accessibility to those seeking homeless dedicated housing resources.

A primary component of the referral process is case conferencing. Coordinators in each of the nine homeless service hubs facilitate case conferencing meetings in their areas with local service providers on a regular basis. During these meetings, the group can make updates to the current vulnerability status of people on the list if there have been changes to their situations, as well as discuss potential housing interventions for each. CoC-funded housing providers are involved in this process, and the group works to identify options for housing placement in the near future, taking care to consider what would be the most appropriate housing intervention for each individual based on their assessment.

It is also worth noting that, while there are separate systems in place or in development for certain subpopulations (veterans, survivors of domestic violence, and youth), those systems may intersect with this system at the referral stage. That is, while the other stages of the coordinated entry process are conducted separately in order to facilitate the best system for each subpopulation, the CoC is aware that some of the same CoC-funded housing resources may be available to multiple subpopulations. For this reason, veteran, youth, and DV providers are invited to the case conferencing meetings and may attend (with de-identified data, if necessary), to allow for a person who is working with those agencies to access resources being discussed in the case conferencing meetings.

Addressing the emergency and transitional housing needs of homeless persons

On the 2024 Housing Inventory Count, the Maine CoC reported a total of 2,063 emergency shelter beds, 770 units of transitional housing, and 2,651 units of permanent housing for homeless individuals and families, including veterans and unaccompanied youth. Some of the emergency shelter beds reported were seasonal in nature due to the harsh winters in Maine. Based on HUD's prioritization of permanent housing, the Maine CoC has given highest priority consideration to permanent housing projects in its NOFO submission. The

Maine CoC also recognizes transitional housing as an important resource for victims of domestic violence, veterans and unaccompanied youth.

The Maine CoC has embraced the Housing First approach, which is fully supported by HUD as a best practice model. This approach emphasizes rapid re-housing and is premised on the fact that people who are homeless or on the verge of homelessness should be returned to and/or stabilized in permanent housing as soon as possible. The Maine CoC prioritizes projects that operate with housing first principles, educates members on the value of the Housing First approach, and tracks the performance of all projects in helping homeless people access and retain housing.

Additionally, ESG funds are targeted to homeless persons and families. MaineHousing provides funding to 39 emergency shelters and 5 homeless service providers without shelter facilities across the state of Maine. Rental assistance and services are provided to people who are homeless and working toward self-sufficiency through the STEP program medium term vouchers. MaineHousing also provides assistance to stabilize and rapidly re-house people who are homeless through the Home to Stay Program, which includes a set-aside of Housing Choice Vouchers paired with stabilization services. MaineHousing has invested in targeted rapid rehousing and additional navigation programs to provide services to participants as they transition into housing from homelessness.

For the past three years, MaineHousing has been able to fund overnight winter warming shelters with state funding. This has been critical to keeping people experiencing homelessness out of the elements during our cold winters and has expanded the community of providers working together to ensure sheltering and transitional housing needs are met.

Helping homeless persons (especially chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth) make the transition to permanent housing and independent living, including shortening the period of time that individuals and families experience homelessness, facilitating access for homeless individuals and families to affordable housing units, and preventing individuals and families who were recently homeless from becoming homeless again.

A number of Maine programs and services help reduce the length of time people experience homelessness and assist them to make the transition to permanent housing. PATH serves homeless individuals & families with unmet mental illness or co-occurring disorders. The SSVF Program provides outreach and case management to at-risk and homeless veteran families statewide. MaineHousing provides ESG funding to 39 shelters and 5 homeless service providers without physical shelter facilities through the ESHAP initiative and has funded targeted rapid rehousing and other housing navigation programs in an effort to support persons as they are moving from homelessness into housing.

Rapid re-housing is available through MaineHousing's ESHAP program, targeted rapid rehousing, navigator services programs, and CoC funded rapid rehousing projects. The Maine CoC was awarded Youth Homelessness Demonstration Program funding in 2020, with continued funding for these youth resources targeted separately to youth. This funding allowed for new rapid rehousing and supportive service projects specifically for youth experiencing homelessness to be created and sustained through ongoing funding. Runaway and Homeless Youth programs (RHY), ESG, Maine DHHS PATH, and state General Funds pay

for outreach, shelter, and engagement services for unaccompanied youth. Not-for-profit providers work with youth, families, and Maine DHHS to support permanent placements, which may include family reunification, foster care, or emancipation (for older youth).

The Maine Homeless Veteran Action Committee was formed with the purpose of coordinating the services of homeless providers for Veterans in the state of Maine, with the goal of creating a system that ends Veteran homelessness. Member representatives from a broad spectrum of veteran-serving organizations are committed to maintaining an accurate by-name list, implementing veteran-specific coordinated entry within the statewide system, and participating in case consultation. Maine is participating in the Built for Zero initiative, and has a goal of reaching functional zero statewide for veterans by June 2025. In 2023, veteran service providers participated in a veterans housing surge which resulted in over 100 veteran families housed.

Frannie Peabody Center provides long-term housing subsidies, short-term rental assistance, and mortgage and utility assistance statewide to low-income people living with HIV/AIDS through HOPWA. They partner with fellow HIV/AIDS service providers across the state to ensure housing needs are met.

Maine has received state funding for a Housing First program that will build new housing units for those experiencing chronic homelessness. The funding will also go to provide wrap around services for tenants once they are housed. This program will be integral in meeting the needs of those with the highest needs.

The Maine CoC has fully implemented a Coordinated Entry System for assessing, prioritizing, and referring those experiencing homelessness to housing resources. This system prioritizes persons based on assessment of housing barriers and current housing needs in order to connect them to resources best matched to them, with participant choice at the forefront.

Finally, the Maine CoC tracks repeat homeless episodes through HMIS and the System Performance Measures. HMIS is used to monitor grantee performance to ensure clients obtain housing, mainstream resources, employment and health services. MaineHousing's ESHAP program requires 12 months of follow-up after program exit. Navigators prevent repeat episodes by developing and monitoring a long-term housing plan, meeting at least monthly with clients, and providing tenant education, landlord mediation, and credit and budget counseling.

Help low-income individuals and families avoid becoming homeless, especially extremely low-income individuals and families who are likely to become homeless after being discharged from a publicly funded institution or system of care, or who are receiving assistance from public and private agencies that address housing, health, social services, employment, education or youth needs

Youth who leave the foster care system because they have attained 18 years of age are eligible to participate in a Voluntary Extended Support program through Maine DHHS called the V9. This voluntary program provides funds to assist the youth in making a successful transition to adulthood, and can cover expenses such as rent, room and board, education costs, clothing allowances and any other specified financial assistance up to the age of 23. Maine DHHS contracts with not-for-profit youth service providers statewide to help youth develop transition plans to obtain transitional housing, permanent housing, permanent supportive housing, or remain in care until they finish their education. MaineHousing has assisted former

foster youth who became homeless attain housing stability through the Family Unification Program. Portland Housing Authority administers a Foster Youth to Independence initiative utilizing Tenant Protection Housing Choice Vouchers to provide rental assistance and services to former foster youth. System involved youth (both the Foster Care and Juvenile Justice systems) are also a target group for the programs initially funded with Youth Homelessness Demonstration Program funds and since continued with CoC funds and receive special attention in the Coordinated Community Plan to Prevent and End Youth Homelessness in the state.

Hospital Discharge Planning Guidelines have been developed by the Statewide Homeless Council and Maine hospitals. The Guidelines instruct hospitals to begin the discharge planning process on admission, and patients are to be discharged with appropriate clothing and with a plan for accessing required medications/supplies. Homeless service providers also monitor discharges to shelters and follow up with hospitals. The Statewide Homeless Council lead an effort to create a Medicaid Waiver for long-term homeless individuals that aims to improve housing search and tenancy support options. Placement options include family, residential treatment facilities, market rate apartments, boarding homes, and other federal-, state- or locally-funded housing options.

The Statewide Homeless Council and the Maine CoC do not support any policies that release inmates to shelters. No specific Department of Corrections policy exists to prevent the release of offenders to shelters, although their goal is not to release to shelters. The Department of Corrections begins pre-release planning 45 days before release (County jails begin 90 days prior). Homeless Service providers work collaboratively with prison staff on pre-release planning, as well as help find community housing and needed supportive services for inmates following release.

MaineHousing funded a homeless prevention program during the COVID-19 pandemic and has continued that effort through its Housing Problem Solving program. The program funds staffing and direct financial assistance to help keep persons at risk of homelessness from entering the system and persons experiencing homelessness to rapidly exit. Staff are trained on housing problem solving conversations that assist participants in resolving their housing crisis which can be paired with short term financial assistance used to address emergent needs.

SP-65 Lead based paint Hazards – 91.315(i)

Actions to address LBP hazards and increase access to housing without LBP hazards

The State will monitor grantees to ensure compliance with HUD lead-based paint regulations implementing Title X of the Housing and Community Development Act of 1992. These regulations cover CDBG, HOME, HTF and ESG programs, and identify the appropriate type of activity to control lead paint hazards in projects using federal funds.

The Maine State Housing Authority Lead Hazard Control Program was developed to provide grants to assist homeowners and landlords make their homes and apartments lead safe. The Program is designed to bring statewide focus to the hazards of lead-based paint poisoning, the importance of proper methods of identification of lead-based paint hazards, and the remediation of lead-based paint hazards.

The Program is a collaborative effort between MaineHousing, the Childhood Lead Poisoning Prevention Program, the Maine Department of Economic Development, and the Maine Department of Environmental Protection. It is administered by MaineHousing and four sub-grantees (Community Action Agencies), with each sub-grantee responsible for implementing the Program within a particular region of Maine.

How are the actions listed above integrated into housing policies and procedures?

See above

SP-70 Anti-Poverty Strategy – 91.315(j)

Jurisdiction Goals, Programs and Policies for reducing the number of Poverty-Level Families

Through the STEP and Home to Stay programs, homeless families are provided rental assistance and needed services. With these subsidies and ongoing stabilization services, these programs start individuals and families on a path out of poverty.

One of the goals of the Maine COC is to increase employment for Continuum of Care funded projects. The focus on increasing employment and housing for the homeless will result in reducing the number of poverty-level families.

How are the Jurisdiction poverty reducing goals, programs, and policies coordinated with this affordable housing plan

MaineHousing funds a number of homeless programs aimed at addressing immediate sheltering needs as well as longer term housing stabilization and poverty reduction. ESHAP navigators work with participants on stability plans that focus on key areas that will support an individual or family in housing stability and self-sufficiency such as employment and education goals. Housing navigators are trained on the RentSmart curriculum, which they offer in full or part to program participants. The curriculum covers a variety of topics around tenancy and long term sufficiency in housing. In addition, these services are often paired with medium and long term housing vouchers that assist participants in getting into and maintaining housing. Additional programming such as targeted rapid rehousing and housing problem solving include service components that often address underlying contributors to homelessness such as employment and past housing related debt.

The MCoC submits and reviews regularly the System Performance Measures, including Measure 4, Employment and Income Growth for Homeless Persons in CoC Program-funded Projects with the goal of increasing employment and income in an effort to support stabilization in housing and poverty reduction.

Maine has recently received funding from the state to address the emergent housing crisis. While this funding is likely short term in nature, it has served to fund some programs that provide services focused on increasing self-sufficiency and reducing poverty including additional housing navigation and stabilization services, peer navigation services, and resettlement services for our asylum seeking and refugee populations.

SP-80 Monitoring – 91.330

Describe the standards and procedures that the state will use to monitor activities carried out in furtherance of the plan and will use to ensure long-term compliance with requirements of the programs involved, including minority business outreach and the comprehensive planning requirements

Expected Resources

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

Introduction

The State of Maine annually receives federal funding from HUD for four formula grant programs of CDBG, ESG, HOME and HTF.

Anticipated Resources

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
CDBG	public - federal	Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services	11,808,636	0	0	11,808,636	47,234,544	DECD through its annual Method of Distribution allocates funds these eligible categories. UGLG then apply based on their community needs.

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
HOME	public - federal	Acquisition Homebuyer assistance Homeowner rehab Multifamily rental new construction Multifamily rental rehab New construction for ownership TBRA	3,893,165	0	0	3,893,165	15,572,660	MaineHousing allocates HOME funds to new construction, rehabilitation, and financing of multi-family rental projects, as well as to TBRA.
ESG	public - federal	Conversion and rehab for transitional housing Financial Assistance Overnight shelter Rapid re-housing (rental assistance) Rental Assistance Services Transitional housing	1,391,803	0	0	1,391,803	5,567,212	MaineHousing provides grants to emergency shelters serving people who are homeless. Grants may be used for shelter operations and rapid re-housing.

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
HTF	public - federal	Acquisition Admin and Planning Homebuyer assistance Multifamily rental new construction Multifamily rental rehab New construction for ownership	3,144,833	0	0	3,144,833	12,579,332	MaineHousing allocates HOME funds to new construction, rehabilitation, and financing of multi-family rental projects.

Table 52 - Expected Resources – Priority Table

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

MaineHousing matches ESG funds with two sources of state funding. The state funding is braided with ESG to fund the ESHAP program as a whole, making the program a \$7.2 million program in 2024. In addition, MaineHousing makes available funding for targeted rapid rehousing and housing problem solving to ESHAP grantees to further support their efforts to prevent and end homelessness.

HOME 25% match requirement will be met with State of Maine DHHS funding for services, as well as interest savings on below market rate loans.

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

Not Applicable

Discussion

Please see above

Annual Goals and Objectives

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

Goals Summary Information

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	Expand Affordable Housing Opportunities	2025	2029	Affordable Housing	State Of Maine	Expand Affordable Housing Opportunities	HOME: \$2,400,000 HTF: \$3,000,000	Rental units constructed: 80 Household Housing Unit
2	Provides Rapid Re-Housing	2025	2029	Homeless	State Of Maine	Help Maine People Attain Housing Stability	HOME: \$1,400,000 ESG: \$643,708	Tenant-based rental assistance / Rapid Rehousing: 2900 Households Assisted
3	Support Emergency Shelter Operations & Services	2025	2029	Homeless	State Of Maine	Help Maine People Attain Housing Stability	ESG: \$643,708	Homeless Person Overnight Shelter: 5000 Persons Assisted
4	Improve and Preserve Quality of Housing	2025	2029	Affordable Housing	State Of Maine	Improve and preserve the Quality of Housing	CDBG: \$3,000,000	Rental units rehabilitated: 100 Household Housing Unit Homeowner Housing Rehabilitated: 200 Household Housing Unit
5	Improve Public Infrastructure	2025	2029	Non-Housing Community Development	State Of Maine	Improve Public Infrastructure	CDBG: \$4,000,000	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 1500 Persons Assisted Facade treatment/business building rehabilitation: 20 Business

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
6	Improve Economic Opportunity	2025	2029	Non-Housing Community Development	State Of Maine	Improve Economic Opportunity	CDBG: \$2,000,000	Jobs created/retained: 30 Jobs Businesses assisted: 100 Businesses Assisted

Table 53 – Goals Summary

Goal Descriptions

1	Goal Name	Expand Affordable Housing Opportunities
	Goal Description	<p>The Rental Loan Program (RLP) provides long-term mortgage financing at attractive interest rates for development of affordable rental housing in projects of five or more units.</p> <p>One goal of the RLP is to provide mortgage financing that enables federal low income housing tax credits to be utilized.</p> <p>Program objectives are:</p> <ul style="list-style-type: none"> • Maximize use of tax exempt bonds to develop affordable housing. • Provide affordable mortgage financing that enables developers to utilize low income housing tax credits. • Provide below-market, 30 year fixed rate notes that enable project viability. • Provide capital for preservation of existing rental housing. <p>This program is a companion to the Low Income Tax Credit (LIHTC) program, and provides subsidized financing to enable use of tax credits. Administrative guidance for the Rental Loan Program is provided through the Rental Loan Program Guide, which is available at www.mainehousing.org. Administrative guidance for the Low Income Housing Tax Credit Program is provided through a rule making process which is required to establish the Allocation of State Ceiling for Low Income Housing Tax Credit. Subsidy comes from FedHOME and HTF funds.</p>

2	Goal Name	Provides Rapid Re-Housing
	Goal Description	MaineHousing's Homeless Solutions Rule (see appendix) states that all grantees must provide services based upon Housing First tenets. Grantees receive access to a variety of set-aside medium and long-term rapid re-housing vouchers to assist them in achieving this goal. Shelters are given training on Rapid Re-Housing and Housing First principals and are required to have a Housing Navigator at each grantee recipient location with a working knowledge of these concepts and have the ability to assist people experiencing homelessness access the set-aside of housing resources. All shelter households must be assessed using the Coordinated Entry Assessment. This process prioritizes households for available housing as quickly and efficiently as possible.
3	Goal Name	Support Emergency Shelter Operations & Services
	Goal Description	The current funding formula allocates 50 percent of the total ESG funding for Shelter Operations, to be disbursed to the eligible ESHAP shelters in Maine based on their Bed Capacity. "Bed Capacity" is defined as the maximum number of beds in an Emergency Shelter as indicated on an annual application; provided, however, the Bed Capacity of a Low Barrier Shelter means its maximum number of beds as indicated on the application multiplied by 125%. This is to support the higher utilization and expenses of Low Barrier Shelters and encourage all ESHAP shelters to move toward Low Barrier models where feasible. Each Emergency Shelter receives a percentage equal to the Emergency Shelter's Bed Capacity divided by total Bed Capacity available statewide for the calendar year.
4	Goal Name	Improve and Preserve Quality of Housing
	Goal Description	DECD will provide funding to support this goal through the Home Repair Network, Housing Assistance and Rural Housing Preservation programs.
5	Goal Name	Improve Public Infrastructure
	Goal Description	DECD will provide funding to support this goal through the Public Infrastructure, Downtown Revitalization and Community Enterprise programs.
6	Goal Name	Improve Economic Opportunity
	Goal Description	DECD will provide funding to support this goal through the Business Assistance and Micro-Enterprise programs.

AP-25 Allocation Priorities – 91.320(d)

Introduction:

MaineHousing anticipates using funds as follows:

Rental Housing: \$ 2.4 million HOME and \$2.7 million HTF -- The Rental Loan Program

Emergency homeless shelter operations & essential services: \$643,708 ESG

Rapid Rehousing: \$643,708 ESG and 1.4M HOME

Percentages in the table below do not include the administrative set-aside.

CDBG priorities are Housing, Infrastructure and Economic Development

Funding Allocation Priorities

	Expand Affordable Housing Opportunities (%)	Provides Rapid Re-Housing (%)	Support Emergency Shelter Operations & Services (%)	Improve and Preserve Quality of Housing (%)	Improve Public Infrastructure (%)	Improve Economic Opportunity (%)	Total (%)
CDBG	0	0	0	40	30	30	100
HOME	63	37	0	0	0	0	100
ESG	0	50	50	0	0	0	100
HTF	100	0	0	0	0	0	100

Table 54 – Funding Allocation Priorities

Reason for Allocation Priorities

The funding listed above is reflective of program history and public input. Allocation amounts are based on demand and capacity of the agencies.

MaineHousing and DECD strive to use federal funds efficiently and effectively by combining them with other available resources that will serve as matching funds.

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

The proposed 2025 funding allocations address the priorities and goals outlined in the Five-Year Consolidated Plan. The distribution of funds will follow the priorities set forth in the Consolidated Plan:

- Expand Affordable Housing Opportunities
- Provide Rapid Re-Housing
- Support Emergency Shelter Operations & Services
- Improve and Preserve the Quality of Housing
- Improve Public Infrastructure
- Improve Economic Opportunity

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

Introduction:

HOME, HTF, ESG and CDBG funding is open to all eligible applicants. The Rental Loan Program Guide, the CDBG Program Statement, the Homeless Program Rule, the ESHAP Program Guide, the STEP Program Guide outline the respective programs.

Distribution Methods

Table 55 - Distribution Methods by State Program

1	State Program Name:	Community Development Block Grant
	Funding Sources:	CDBG
	Describe the state program addressed by the Method of Distribution.	see attached Program Statement which outlines the 2025 CDBG Program
	Describe all of the criteria that will be used to select applications and the relative importance of these criteria.	see attached CDBG Program Statement
	If only summary criteria were described, how can potential applicants access application manuals or other state publications describing the application criteria? (CDBG only)	see attached CDBG Program Statement

	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)	
	Describe how resources will be allocated among funding categories.	see attached CDBG Program Statement
	Describe threshold factors and grant size limits.	see attached CDBG Program Statement
	What are the outcome measures expected as a result of the method of distribution?	see attached CDBG Program Statement
2	State Program Name:	Emergency Shelter and Housing Assistance Program (ESHAP)
	Funding Sources:	ESG

<p>Describe the state program addressed by the Method of Distribution.</p>	<p>In consultation with the MCoC and in partnership with Emergency Shelters throughout the state, MaineHousing offers the ESHAP Program as an annual Grantee process to assist individuals and families who are experiencing homelessness. The funding formula allocation is outlined in the Homeless Solutions Rule and the ESG Written Standards and detailed in the annual program guide and application.</p>
<p>Describe all of the criteria that will be used to select applications and the relative importance of these criteria.</p>	<p>To be eligible to receive ESHAP funds an applicant must:</p> <ul style="list-style-type: none"> • Be a 501(c)(3) not-for-profit organization. • Be eligible in accordance with the HEARTH Act. • Be a provider of homeless services with at least one year of experience providing emergency housing, street outreach, homeless prevention or Rapid Re-Housing services. • Be a regular and active participant in the Maine Continuum of Care. • Have a board/advisory board that includes at least one person who is homeless or formerly homeless who is involved in policy or public planning of the organization. • Participate in the Coordinated Entry System. • Not engage in any explicitly religious activities, such as worship or religious instruction. If religious activities are offered, they must occur at a separate time or location from the activities and services covered in this rule. • Participate in the Housing Management Information System (HMIS) or a comparable database for victims of domestic violence and meet performance and reporting requirements. <p>For a complete list of requirements, see the Emergency Shelter and Housing Assistance Program Guide and Application (Attached)</p> <p>Repeat applicants are funded by demonstrating they have met minimum threshold requirements. New applicants are funded by demonstrating they have met minimum threshold requirements and have been determined by a selection committee to be funded based on community need and ability to meet that need. Funded applicants receive a percentage of funding as outlined in the ESHAP Program Guide and Application.</p>

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

<p>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)</p>	<p>Shelter Operations: An amount equal to 45% of the Funding Formula Allocation will be disbursed among Emergency Shelters, such that each Emergency Shelter will receive a percentage equal to its Bed Capacity divided by a number equal to the total Bed Capacity available statewide for the calendar year. MaineHousing will review the number of beds reported, along with occupancy data to ensure that bed utilization is commensurate with community need. If a persistent discrepancy is observed, MaineHousing, at its sole discretion, reserves the right to reduce the number of funded beds.</p> <p>Housing Stabilization Share: An amount equal to 45% of the Funding Formula Allocation will be disbursed among eligible agencies, such that each agency providing staffing for Rapid Re-housing, Housing First and Housing Stabilization services operated by the agency will be eligible to receive a percentage equal to the agency's total number of Clients Assessed and Stabilized, divided by the total number of Clients Assessed and Stabilized statewide. The number of Clients Assessed and Stabilized will be based upon the most recent four quarters of data available to MaineHousing at the start of the grant year.</p> <p>Performance Share: (The Performance Share does not include ESG or HOME funds and is funded solely through State funds) An amount equal to 10% of the Funding Formula Allocation will be allocated among eligible applicants that in the previous 6 months maintained or increased their data quality for the following data points: Date of Birth, Race, Veteran Status, Destination, Relationship to Head of Household, and Client Location. In January and July of each year, Maine HMIS will report to each eligible applicant their error rate for each of those data points. Victim Service Providers will report from their comparable database. At the conclusion of the six month period, any eligible applicant whose data error rate is equal to or less than it was at the beginning of the period, will be eligible for a portion of Performance Share funds equal to the percentage of the number of Clients Assessed and Stabilized by the eligible applicant, divided by the number of Clients Assessed and Stabilized by all eligible applicants.</p>
<p>Identify the method of selecting project sponsors (including providing full access to grassroots faith-based and other community-based organizations). (HOPWA only)</p>	

	Describe how resources will be allocated among funding categories.	Not Applicable
	Describe threshold factors and grant size limits.	Grants are based upon the threshold as described in the Maine Homeless Solutions Rule and the ESHAP Program Guide and Application. MaineHousing uses up to 50 percent of ESG funding for emergency shelter operations as noted in the Operations Share description above and the remaining funds for the Stabilization Share also as detailed above.
	What are the outcome measures expected as a result of the method of distribution?	MaineHousing provided emergency shelter for 4,838 people in 2023, and we anticipate serving a like amount in 2024. All shelters receiving funding will be tracked on performance benchmarks such as exits to permanent housing, returns to homelessness, and length of time from program entry to housing and may receive additional funding depending on their ability to meet these benchmarks.
3	State Program Name:	Rental Loan Program
	Funding Sources:	HOME HTF

<p>Describe the state program addressed by the Method of Distribution.</p>	<p>The primary goal of the Rental Loan Program is to create and preserve affordable multi-family residential rental housing in the State of Maine.</p> <p>Preservation may include federally-assisted housing, such as HUD 202, HUD 811 and Rural Development 515 properties at risk of being lost due to the expiration of federal rental assistance contracts, physical or financial deterioration, and/or owners opting out of federal housing programs.</p> <p>To achieve the goals of this Program, MaineHousing will make various resources available in the form of amortizing loans, deferred payment loans and/or grants under this Program or in conjunction with the Program from time to time, including without limitation, the following resources:</p> <ul style="list-style-type: none"> • taxable bond proceeds; • private activity tax-exempt bonds; • 501(c)(3) or governmental unit tax-exempt bond proceeds; and • subsidy resources. <p>These resources are usually combined with equity generated from the syndication of Low Income Housing Tax Credits (LIHTC). Competitive credits and “automatic” credits are awarded in accordance with Maine’s Qualified Allocation Plan.</p> <p>MaineHousing attempts to maximize the benefit of these limited resources by combining the resources and encouraging applicants to seek other non-MaineHousing resources.</p> <p>Amortizing loans, funded with the proceeds of taxable or tax-exempt bond proceeds, for developments that do not need MaineHousing subsidy are available typically on a walk-in basis.</p> <p>MaineHousing allocates competitive low income housing tax credits separately under MaineHousing’s Low Income Housing Tax Credit Program. All applicants who are awarded low income housing tax credits on a competitive basis or are eligible for “automatic” low income housing tax credits must comply with the applicable Qualified Allocation Plan.</p> <p>MaineHousing may make various discretionary subsidy resources available from time to time.</p>
---	--

<p>Describe all of the criteria that will be used to select applications and the relative importance of these criteria.</p>	<p>Qualified developers may apply. Applicants must:</p> <ul style="list-style-type: none"> • Demonstrate previous successful experience in the development of similar projects. • Have a satisfactory credit history and demonstrate adequate financial capacity to own and operate the housing. • Have control of the development site. • Demonstrate they will provide the required number of lower income units. <p>In addition, the management agent for the housing must demonstrate successful experience in managing similar properties. MaineHousing generally selects those developments that will provide the greatest amount of long term, low-income housing at the least cost of taxpayer subsidy dollars.</p>
<p>If only summary criteria were described, how can potential applicants access application manuals or other state publications describing the application criteria? (CDBG only)</p>	
<p>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)</p>	

<p>Identify the method of selecting project sponsors (including providing full access to grassroots faith-based and other community-based organizations). (HOPWA only)</p>	
<p>Describe how resources will be allocated among funding categories.</p>	<p>HOME and HTF funds allocated to the Rental Loan Program are expected to be used for the construction of qualified residential rental projects.</p>
<p>Describe threshold factors and grant size limits.</p>	<p>A. Combination of Available Resources MaineHousing attempts to maximize the impact of the limited resources it has available by combining resources and encouraging applicants to seek other non-MaineHousing sources of funding.</p> <p>B. Tax-exempt Bond Financing MaineHousing may issue tax-exempt bonds under Section 142(d) or Section 145 of the Internal Revenue Code (Code) as a source of funding under the Program. The Code imposes certain requirements and limitations on the use of tax-exempt bond proceeds. There may be additional requirements under the Program.</p> <p>C. Non Tax Exempt Proceeds Non tax exempt proceeds are used mostly in conjunction with an allocation of low income housing tax credits under the competitive Low Income Housing Tax Credit Program.</p> <p>D. Subsidy Resources Any project receiving subsidy is subject to the regulatory requirements associated with the subsidy resource.</p>
<p>What are the outcome measures expected as a result of the method of distribution?</p>	<p>MaineHousing expects to produce or preserve 80 rental units.</p>

4	State Program Name:	Stability through Engagement Program (STEP) - TBRA
	Funding Sources:	HOME
	Describe the state program addressed by the Method of Distribution.	STEP is designed to provide short- and medium-term rental assistance for up to 24 months to help individuals and families experiencing homelessness achieve housing stability. Referrals to the STEP Program can only be made by the Maine Coordinated Entry System (MCES).
	Describe all of the criteria that will be used to select applications and the relative importance of these criteria.	<p>Rapid Re-housing participants may be eligible to receive short- and medium-term rental assistance, for a maximum of 24 months, through STEP if they meet the following requirements (unless prohibited by VAWA):</p> <ul style="list-style-type: none"> • Staying in a shelter or working with an ESHAP provider. • Enrolled and participating in ESHAP with an approved Housing Stability Plan. • Continued contact with their Housing Navigator to review progress no less than every 30 days. • Reassessment to evaluate if continued assistance is necessary at 12 months. • Referred to STEP from the MCES Prioritized List. <p>See STEP Administrative Plan for detail https://www.mainehousing.org/docs/default-source/homeless/homeless-initiatives/step/step-resources/2023-step-administrative-plan.pdf</p>
	If only summary criteria were described, how can potential applicants access application manuals or other state publications describing the application criteria? (CDBG only)	

<p>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)</p>	
<p>Identify the method of selecting project sponsors (including providing full access to grassroots faith-based and other community-based organizations). (HOPWA only)</p>	
<p>Describe how resources will be allocated among funding categories.</p>	N/A
<p>Describe threshold factors and grant size limits.</p>	N/A
<p>What are the outcome measures expected as a result of the method of distribution?</p>	<p>The goal for the STEP program is to administer 150 STEP coupons to rapidly re-house individuals and/or families experiencing homelessness and to keep 95% of them stably housed.</p>

Discussion:

The method of distribution above relates to money budgeted to the programs mentioned. Administrative costs are partially covered by 10 percent of the annual HOME and HTF allocations and 7.5 percent of the annual ESG allocation.

AP-35 Projects – (Optional)

Introduction:

See the CDBG 2024 Program Statement

#	Project Name
1	ESG25 Maine
2	HOME25 TBRA
3	Rental Loan Program 2025
4	HOME25 Admin
5	HTF25 Admin

Table 56 – Project Information

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

The allocation priorities are reflective of program history and public input. Allocation amounts are based on demand and capacity of the agencies.

MaineHousing and DECD strive to use federal funds efficiently and effectively by combining them with other available resources that will serve as matching funds.

AP-38 Project Summary
Project Summary Information

1	Project Name	ESG25 Maine
	Target Area	State Of Maine
	Goals Supported	Provides Rapid Re-Housing Support Emergency Shelter Operations & Services
	Needs Addressed	Help Maine People Attain Housing Stability
	Funding	ESG: \$1,287,416
	Description	The Current funding formula allocates 50 percent of the Total ESG funding for Shelter Operations, to be disbursed to the eligible ESHAP shelters in Maine based on their bed capacity.
	Target Date	12/31/2025
	Estimate the number and type of families that will benefit from the proposed activities	Overnight shelter for 5000 people experiencing homelessness in 2025, and 2900 Households assisted with associated Housing First services.
	Location Description	Statewide
	Planned Activities	Shelter Operations
2	Project Name	HOME25 TBRA
	Target Area	State Of Maine
	Goals Supported	Provides Rapid Re-Housing
	Needs Addressed	Help Maine People Attain Housing Stability
	Funding	HOME: \$1,400,000
	Description	Medium and long-term rapid re-housing vouchers for people experiencing homelessness, as well as, associated Housing First services.
	Target Date	12/31/2025
	Estimate the number and type of families that will benefit from the proposed activities	150 households will be assisted with TBRA.
	Location Description	Statewide
	Planned Activities	Short and Medium term rental assistance for 24 months
3	Project Name	Rental Loan Program 2025
	Target Area	State Of Maine
	Goals Supported	Expand Affordable Housing Opportunities
	Needs Addressed	Expand Affordable Housing Opportunities
	Funding	HOME: \$2,400,000 HTF: \$3,000,000

	Description	The Rental Loan Program (RLP) provides long-term mortgage financing at attractive interest rates for development of affordable rental housing in project of five or more units.
	Target Date	12/31/2025
	Estimate the number and type of families that will benefit from the proposed activities	80 affordable rental units for eligible households.
	Location Description	Statewide
	Planned Activities	New construction and rehabilitation of multifamily housing.
4	Project Name	HOME25 Admin
	Target Area	
	Goals Supported	
	Needs Addressed	
	Funding	HOME: \$389,316
	Description	HOME Admin and Program Income Admin
	Target Date	12/31/2025
	Estimate the number and type of families that will benefit from the proposed activities	
	Location Description	
	Planned Activities	
5	Project Name	HTF25 Admin
	Target Area	
	Goals Supported	
	Needs Addressed	
	Funding	HTF: \$300,000
	Description	HTF Admin
	Target Date	12/31/2025
	Estimate the number and type of families that will benefit from the proposed activities	
	Location Description	
	Planned Activities	

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

Acceptance process of applications

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

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 State of Maine does not prioritize the allocation of CDBG, HOME, HTF or ESG funds geographically. Income eligible citizens, Community Housing Development Organizations, eligible HTF recipients, and housing developers may apply for grants or loans from anywhere in Maine. Low Income Housing Tax credit priorities include projects in rural areas and Difficult to Develop Areas.

The CDBG program is available statewide to the non entitlement units of general local government

Geographic Distribution

Target Area	Percentage of Funds
State Of Maine	100

Table 57 - Geographic Distribution

Rationale for the priorities for allocating investments geographically

One state subsidy source requires that four projects for older adults are funded in counties with fewer than 100,000 people. Otherwise, MaineHousing has not chosen to target particular geographical areas for special assistance.

The CDBG program is required to make funds available statewide to the non entitlement units of general local government

Discussion

Please see above.

Affordable Housing

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

Introduction:

Affordable housing goals vary by program and the population to be served. Data in the following tables may overlap due to programs that assist both households as well as individuals.

The term affordable housing used in 24 CFR 92.252 and 92.254 includes several elements that are not requirements of ESG and CDBG. Therefore, only HOME and HTF units that receive federal assistance that can be assured of meeting the standard of "affordable housing" are described here.

One Year Goals for the Number of Households to be Supported	
Homeless	150
Non-Homeless	50
Special-Needs	30
Total	230

Table 58 - One Year Goals for Affordable Housing by Support Requirement

One Year Goals for the Number of Households Supported Through	
Rental Assistance	150
The Production of New Units	70
Rehab of Existing Units	10
Acquisition of Existing Units	0
Total	230

Table 59 - One Year Goals for Affordable Housing by Support Type

Discussion:

The goals listed above are in relation to HOME and HTF funding only. Additional households will be assisted with other programs offered by MaineHousing and DECD.

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

Introduction:

The State of Maine does not operate any public housing units directly, nor does it receive any funding to do so. When requested, MaineHousing reviews Annual and Five-Year Plans of public housing authorities and issues certifications to those that are consistent with Maine's Consolidated Plan.

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

While MaineHousing does not have jurisdiction over public housing agencies, several public housing authorities and other housing and community development agencies are required to obtain a certification that their program plans are consistent with the State of Maine Consolidated Plan. The State Consolidated Plan serves the majority of the state since only a few local jurisdictions develop Consolidated Plan documents. MaineHousing will serve as the lead agency for reviewing housing plans for consistency with the housing component of the State Consolidated Plan.

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

Public housing residents are encouraged to participate in the home buyer programs offered through MaineHousing and its participating lenders, as long as they meet eligibility criteria.

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

MaineHousing is not designated as a troubled PHA.

Discussion:

See Above

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

Introduction

The Emergency Solutions Grant (ESG) program is designed to help with operating shelter costs as well as health, employment, and housing services; rapid re-housing and housing stabilization services for homeless individuals and families; and HMIS data collection. This funding opportunity is available to existing emergency shelters throughout the state sponsored by not-for-profit organizations and local municipalities. Administrative guidance for the Emergency Solutions Grant Program is provided through the Homeless Solutions Rule, Emergency Shelter and Housing Assistance Program (ESHAP) Program Guide & Application, MaineHousing ESG Written Standards, and the STEP Admin plan.

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

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

MaineHousing's Homeless Solutions Rule states that all grantees will provide services based upon Housing First tenets. Grantees are given access to medium and long-term rapid re-housing resources to assist them in achieving this goal. Shelters are provided training on Rapid Re-Housing and Housing First principals and are required to have a Housing Navigator at each grantee recipient location with a working knowledge of these services and concepts. All shelter households must be assessed with the CoC's coordinated entry assessment to prioritize and place households on the appropriate track for available housing as quickly and efficiently as possible. Housing navigators work with participants on Housing Stability Plans which help navigators and participants identify personalized needs and goals and create a plan to work toward meeting those goals. All shelters are given the opportunity to extend their housing relocation and stabilization services beyond their shelter to serve persons experiencing homelessness who are unsheltered. The rapid-rehousing service one-year goal is to provide housing stabilization and relocation services for 2,900 households.

Addressing the emergency shelter and transitional housing needs of homeless persons

ESG funding will be utilized for shelter operations and rapid re-housing activities, as well as HMIS data collection. The ESG shelter funding one-year goal is to provide assistance to 5,000 persons served by 39 ESG funded shelters.

Helping homeless persons (especially chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth) make the transition to permanent housing and independent living, including shortening the period of time that individuals and families experience homelessness, facilitating access for homeless individuals and families to affordable housing units, and preventing individuals and families who were recently homeless from becoming homeless again

There are a number of programs and services that will continue with the support of state partners and MaineHousing to assist homeless persons in making the transition to permanent housing, reduce the length

of time people experience homelessness, and help prevent them from becoming homeless again.

- PATH serves at-risk individuals and families with unmet mental illness or co-occurring disorders.
- The SSVF Program provides outreach and case management to at-risk veterans' families statewide.
- Pine Tree Legal Assistance helps people prevent evictions in larger cities.
- MaineHousing provides ESG funding and the ESHAP program to 44 homeless service providers, including 39 shelters.
- MaineHousing provides state funding for Targeted Rapid Rehousing and Housing Problem Solving to quickly move persons into housing with short term assistance and to divert those at risk from the homeless services system through problem solving conversations and short term financial assistance.
- Recent state funding will support the production of and continued service provision for Housing First projects dedicated to those experiencing chronic homelessness.

Maine's recently implemented Coordinated Entry System will provide access points where persons experiencing homelessness can access the system, be assessed, prioritized, and referred to CoC funded resources. MaineHousing is also committed to including more housing resources in the Coordinated Entry System. Emergency Shelters will continue to be funded with an emphasis on performance measures that increase the number of households able to obtain and maintain permanent housing and reduce the incidents of returns to homelessness.

ESHAP and Targeted Rapid Rehousing have a strong focus on housing stabilization services, as will the Housing First program. Navigators in these programs follow participants as they become housed and work toward stabilization. Services are provided for up to one year after a participant is housed to ensure they have the proper supports and structures in place to maintain successful housing placements.

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

Foster Care: Maine DHHS contracts with nonprofit youth service providers statewide to help youth and families develop healthy transition plans and assist youth in obtaining Transitional Housing, Permanent Housing, and Permanent Supportive Housing, or to remain in care until they have finished their education. Providers actively monitor teens who are discharged from foster care to the streets or shelters, and advocate with Maine DHHS for improved policies and resources.

Health Care: Hospital Discharge Planning Guidelines have been developed by the Statewide Homeless Council and Maine hospitals regarding the discharge of homeless patients. The Guidelines instruct hospitals to begin the discharge planning process upon admission. Patients are to be discharged with appropriate clothing and with a plan for accessing required medications/supplies. Homeless service providers also monitor discharges to shelters and follow up with hospitals as needed. Each Maine hospital or community discharge location must designate a management team member to oversee ongoing compliance with the

Guidelines.

Mental Health: The Guidelines above also include discharge planning for patients with mental health issues, instructing hospitals to begin the discharge planning process upon admission, and working with appropriate providers. Homeless service providers monitor discharges of patients with mental illness to shelters and follow up as necessary. The Statewide Homeless Council lead an effort to create a Medicaid Waiver for long-term homeless individuals that aims to improve housing search and tenancy support options. Placement options include family, residential treatment facilities, market rate apartments, boarding homes, and other federal-, state- or locally-funded housing options (such as Section 515 rental units, LIHTC-funded projects, HOPWA-funded housing, local- or state-funded residential recovery or transitional housing, group homes, and/or halfway houses). Individuals needing higher levels of medical care may be placed in private non-medical institutions.

Corrections: The Statewide Homeless Council and MCoC do not support any policy that releases inmates to shelters. Although no specific Department of Corrections (DoC) policy exists to prevent release of offenders to shelters, Maine DoC's goal is to prevent release to shelters. To achieve this goal, DoC's policy is to begin pre-release planning 45 days prior to release (County jails begin pre-release planning at 90 days). Homeless service providers work collaboratively with prison staff to help find community housing and supportive services (when needed) for inmates following release.

Prevention Programming: MaineHousing stood up diversion programming during the COVID-19 pandemic and has since shifted to a housing problem solving program model aimed at keeping people from entering the homeless service system through problem solving conversations and financial assistance.

Discussion

See Above

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

Introduction:

State and federal public policies are instrumental in shaping affordable housing and residential investment. In most cases, these policies aim to provide benefits and incentives to create affordable housing, however, consequently a number of these policies negatively impact the cost of developing, maintaining, and improving affordable housing. Most concerning are federal funding regulatory requirements such as Davis Bacon, Section 3, and Build America Buy America (“BABA”), which can increase costs for many affordable housing programs and projects. For example, with respect to BABA there may be circumstances where certain types of essential equipment (such as cold weather heat pumps) are not readily available in the United States, which could result in increased costs, delays or use of inferior products to meet the requirements. Additionally, local regulatory and process barriers, including community development standards, discourage the creation and preservation of affordable housing and create complicated land use issues which impede development.

Beyond regulatory impediments, scarcity of federal and public resources attribute to the negative effects on affordable housing and residential investment. MaineHousing continues to see an exceptionally high level of competition for 9% and 4% Low Income Housing Tax Credits and there is a similar scarcity of resources with Housing Choice Vouchers (HCV). With stagnant budgets and rising rents in the HCV Program, recipients are struggling to find eligible units. Additionally, with a rise in demand for assistance, federal programs such as LIHEAP, that remain funded at the same level, are falling short in keeping housing and housing-related costs affordable for income-qualified households in Maine. Considering the record rate of inflation observed during the past three years, the effectiveness of a given level of funding is necessarily diminished relative to the pre-pandemic period.

A final barrier is reliable information dissemination to renters, homeowner, and landlords. This is a perverse side effect of the information-rich modern media environment, which provides ready access information but no one information channel (e.g. television news, print news, social media, podcasts, etc.) can be relied on to deliver a consistent message to the public. This means it is more difficult to inform households of programs they may be eligible for; more difficult to protect the public from misinformation; more difficult to educate homeowners and landlords about program benefits; and more difficult to educate the public about the benefits of affordable housing development in their communities.

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

Resistance to housing development is a local issue with statewide implications, which are particularly impactful for some of the lowest paid members of our workforce. The Governor’s Office, MaineHousing, and the Department of Economic and Community Development have approached addressing this barrier with the soft touch of offering resources and information. In 2023 we released a Statewide Housing Study with in-depth analysis of our housing shortage and the implications for our housing and labor markets. In 2024 we launched a housing data portal to help inform and educate everyone from legislators to city planners to homebuyers, with tools to conduct in-depth analysis in addition to visualizing basic statistics. We also work together to learn about and disseminate the latest information and evidence about zoning practices, local

housing policy, and the economic benefits of affordable housing. Finally, as discussed below, at MaineHousing we plan to develop a new marketing campaign about who affordable housing is for, to help dispel some of the myths and stigma around affordable housing development.

Discussion:

Addressing the barriers imposed by BABA and resource scarcity is mostly a matter of legislative advocacy, on which MaineHousing continues to work proactively with the Governor's Office and in both the state and federal legislative chambers. However, it is also a matter of public opinion. In 2024 MaineHousing Executive Director Daniel Brennan wrote a powerful op-ed illustrating who affordable housing is for, helping to dispel myths, disinformation, and stigma around affordable housing development. MaineHousing plans to develop an affordable housing awareness campaign around this same narrative, sharing profiles of actual residents of affordable housing developments and their stories.

A strategy to address the final barrier, one that MaineHousing has already begun to implement, is to diversify our educational and marketing efforts. For example, partnering with community organizations to offer program information directly to marginalized communities. Also, in 2024 MaineHousing began expanding its in-person marketing activities, reaching Mainers out in the community rather than remaining mostly within digital and traditional marketing spaces. The largest such event to date was Homeownership Day at the Seadogs in June of 2024.

Two other strategies take a more direct approach to addressing the same barrier. One is landlord incentives to increase housing unit participation with Housing Choice Vouchers and the STEP program. The second is the Housing Problem Solving program, which focuses a small portion of resources at local shelters towards supporting households at risk of eviction. The latter often amounts to offering information and expertise in navigating the available options.

AP-85 Other Actions – 91.320(j)

Introduction:

The following sections discuss other actions MaineHousing and DECD will undertake in FY 2025.

Actions planned to address obstacles to meeting underserved needs

Continue to support the homeless service hub system and Hub Coordinators in their efforts to bring together municipalities, service providers, and other cross sector collaborators.

Enhance supportive services pre-and-post-housing placement through programs like rapid rehousing.

Increase outreach capacity statewide through grant funding.

Work with the MCoC on an updated plan to end and prevent homelessness focusing on strategies to address homelessness and the needs of sub-populations such as unaccompanied youth and people exiting hospitals and the criminal justice system.

Increase the availability of affordable and safe housing, including Housing First projects supported with wraparound services.

Create training opportunities for providers and the community to improve outcomes and to educate and reduce stigma about homelessness, mental health and substance use.

Use data to lead planning and program priorities.

Increase the availability of housing vouchers and subsidies.

Increase focus on including people with lived experience in homelessness in the development of homeless policy

Actions planned to foster and maintain affordable housing

The activities to foster and maintain affordable housing include the production of new units, and financing home purchase and home rehabilitation.

The State utilizes other programs to help foster and maintain affordable housing including:

- Low Income Housing Tax Credits (LIHTC)
- the Housing Choice Voucher program
- the Low Income Heating Assistance Program (HEAP) and the Weatherization program, and
- the Maine State Low Income Tax Credit program provides additional resources to support the

development of affordable housing.

Actions planned to reduce lead-based paint hazards

The State will monitor grantees to ensure compliance with HUD lead-based paint regulations implementing Title X of the Housing and Community Development Act of 1992. These regulations cover CDBG, HOME, HTF and ESG programs, and identify the appropriate type of activity to control lead paint hazards in projects using federal funds.

The Maine State Housing Authority Lead Hazard Control Program was developed to provide grants to assist homeowners and landlords make their homes and apartments lead safe. The Program is designed to bring statewide focus to the hazards of lead-based paint poisoning, the importance of proper methods of identification of lead-based paint hazards, and the remediation of lead-based paint hazards.

The Program is a collaborative effort between MaineHousing, the Childhood Lead Poisoning Prevention Program, the Maine Department of Economic Development, and the Maine Department of Environmental Protection. It is administered by MaineHousing and four sub-grantees (Community Action Agencies), with each sub-grantee responsible for implementing the Program within a particular region of Maine.

Actions planned to reduce the number of poverty-level families

The State of Maine has not formally adopted a statewide anti-poverty strategy. However, the strategy and goals of the Five-Year Consolidated Plan and the Annual Action Plan directly address the issues of individuals who are living in poverty.

In Maine, there is a statewide network of Community Action Agencies (CAAs) with a common purpose of providing services to low income people across Maine. The goal of these agencies is to empower low income people to lift themselves and their families out of poverty.

Actions planned to develop institutional structure

The State of Maine has an efficient institutional structure through which housing and community development programs are delivered. DECD is the administrator of CDBG funds and MaineHousing is the administrator of HOME, HTF and ESG funding. Both MaineHousing and DECD participate in a number of standing meetings with representatives from state and local government, the Continuum of Care, and not-for-profit and private providers of housing, homelessness and economic development services.

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

MaineHousing will continue to support the homeless service hub structure with a hub coordinator in each of the nine service hubs. Hub coordinators are tasked with enhancing collaboration in their communities among public, private, and social service agencies.

MaineHousing, as the MCoC Collaborative Applicant plans to support the MCoC and the Statewide

Homeless Council in their continued efforts to get more agencies at the table to coordinate to prevent and end homelessness.

Discussion:

Please see above

Program Specific Requirements

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

Introduction:

HOME, HTF, ESG and CDBG funding is open to all eligible applicants. The Rental Loan Program Guide, the CDBG Program Statement, the Homeless Program Rule, the ESHAP Program Guide, the STEP Program Guide outline the respective programs.

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 |
| Total Program Income: | 0 |

Other CDBG Requirements

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

HOME Investment Partnership Program (HOME)

Reference 24 CFR 91.320(k)(2)

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

Maine utilizes only the forms of investment included in Section 92.205.

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:

MaineHousing does not intend to use HOME funds for homebuyer 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:

MaineHousing does not intend to use HOME funds for homebuyer 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:

The MaineHousing Rental Loan Program Guide is the document which governs lending activities, including those projects financed with HOME funds. The RLP Guide specifically refers to compliance with 24 CFR Part 92 for any project which uses HOME funds. The RLP Guide describes eligible applicants and the application process. The RLP Guide is available on the MaineHousing website.

The refinancing requirements include the following conditions:

- 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.
- Require a review of management practices to demonstrate that disinvestment in the property has not occurred; that long-term needs of the project can be met; and that the feasibility of serving the targeted population over an extended affordability period can be demonstrated.
- State whether the new investment is being made to maintain current affordable units, create additional affordable units, or both.
- Specify the required period of affordability, whether it is a minimum 15 years or longer.
- Specify whether the investment of HOME funds may be state-wide or limited to a specific geographic area, such as a community identified in a neighborhood revitalization strategy under 24 CFR 91.315(g) or

a federally designated Empowerment Zone or Enterprise Community.

- State that HOME funds cannot be used to refinance multifamily loans made or insured by any federal program, including the CDBG program.
5. If applicable to a planned HOME TBRA activity, a description of the preference for persons with special needs or disabilities. (See 24 CFR 92.209(c)(2)(i) and CFR 91.220(l)(2)(vii)).

N/A

6. If applicable to a planned HOME TBRA activity, a description of how the preference for a specific category of individuals with disabilities (e.g. persons with HIV/AIDS or chronic mental illness) will narrow the gap in benefits and the preference is needed to narrow the gap in benefits and services received by such persons. (See 24 CFR 92.209(c)(2)(ii) and 91.220(l)(2)(vii)).

N/A

7. If applicable, a description of any preference or limitation for rental housing projects. (See 24 CFR 92.253(d)(3) and CFR 91.220(l)(2)(vii)). Note: Preferences cannot be administered in a manner that limits the opportunities of persons on any basis prohibited by the laws listed under 24 CFR 5.105(a).

N/A

Emergency Solutions Grant (ESG) Reference 91.320(k)(3)

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

Please see the CoC Emergency Solutions Grant (ESG) Written Standards.

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

Please see the attached Maine Continuum of Care Coordinated Entry Policies and Procedures.

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

In consultation with the MCoC and in partnership with Emergency Shelters throughout the state,

MaineHousing offers the ESHAP Program as an annual Grantee process to assist individuals and families who are experiencing homelessness. The program is open to not-for-profit organizations and municipalities.

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.

MaineHousing and its ESG Grantees currently meet the homeless participation requirement in 24 CFR 576.405(a).

5. Describe performance standards for evaluating ESG.

With assistance from HUD Technical Assistance, a monitoring tool, which includes a risk analysis score, and a CoC reporting mechanism has been created and is currently in use. In addition, performance standards including exits to permanent housing, returns to homelessness, and length of time from program entry to housing are analyzed using HMIS data and utilized to evaluate the effectiveness of the program and specific providers.

Housing Trust Fund (HTF)
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 applicants are:

Successful LIHTC applicants.

Funds remaining after the initial RFP process may be distributed by MaineHousing under a subsequent RFP available to all or a subset of the above eligible recipients. Individuals are not eligible to receive direct assistance from the HTF. The State does not intend to use sub-grantees in the 2025 funding cycle.

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".

Eligible applicants who apply for 9% LIHTC funding under Maine's QAP receive points for agreeing to accept HTF funding. Projects are allocated additional points if they dedicate 20% or more of tax credit units to house individuals with special needs at 30% of AMI or less. Those units are allocated HTF funds as well.

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".

HTF funds will be used in projects that were awarded 9% LIHTC funding under Maine's QAP and received additional points for pledging 20% or more of tax credit units to house individuals with special needs at 30% of AMI or less.

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".

The entire State of Maine is eligible to receive funding under this program.

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".

15 of a possible 85 points awarded under Maine's QAP are dedicated to developer readiness and capacity. A greater number of points are awarded to applicants that have undertaken more work before application, and who have demonstrated a history of timely and cost-efficient development. These are in our experience the

greatest indicators of future success.

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".

All HTF-funded units are required to be rented to those at 30% of AMI or less. Additionally, MaineHousing provides PBVs for all of those units which do not have them from another source.

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".

MaineHousing will require that affordability be for a 30 year term. The affordability requirements will be outlined in a deed covenant that will be recorded in the applicable registry of deeds.

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".

15 of a possible 85 points awarded under Maine's QAP are dedicated to projects that provide Smart Growth features such as access to transportation and greater walkability.

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".

Maine's QAP provides up to 3 points for projects that receive property tax relief.

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

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.

Cost reasonableness will be evaluated using an index, which is the weighted average of the TDC per unit and the TDC per bedroom. For mixed-use projects, the TDC for only the residential portion of the project, including common areas, will be used for this calculation. The weighted average will be calculated as follows:

$([2 \times \text{TDC/unit}] + [\text{TDC/bedroom}]) \text{ divided by } 3.$

The product of this calculation will be referred to throughout this document as the "TDC Index". An Application will be rejected if the TDC Index exceeds the TDC Index Cap below for a project of its type at any time prior to the later of the construction loan closing or carryover allocation.

Type of Project	TDC Index Cap
Adaptive Reuse	\$395,000per unit
New construction	\$370,000per unit
Acquisition and rehabilitation of existing housing	\$340,000 per unit

All units receiving funding under the QAP must abide by the Total Development Cost (TDC) Index limits. Because of these limits, the amount of HTF per unit may not exceed the Caps above. The amount of HTF used in these set-aside units will vary depending on how much the project receives in tax credits, the TDC, how much income PBVs provide, and how much operating costs the units incur. Effectively HTF Per Unit = TDC Index Per Unit – LIHTC Per Unit – Paying Debt Per Unit.

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; Capital Needs Assessments (if applicable); and broadband infrastructure (if applicable).

MaineHousing has very high rehabilitation standards as outlined in our Construction Services Quality and Procedures Manual - https://mainehousing.org/docs/default-source/development/construction-services/2024-quality-standards-manual/2024-quality-standards-and-procedures-manual-06032024.pdf?sfvrsn=4fc99e15_8

In addition, MaineHousing will further require that:

- The project team shall provide an estimate (based on age and condition) of the remaining useful life of the major building systems upon project completion. Major systems include: structural support and roofing; cladding and weatherproofing (e.g., windows, doors, siding, gutters); plumbing; electrical; and heating, ventilation, and air conditioning.

- For multifamily housing with 26 or more total units, the useful life of systems must be determined through a capital needs assessment that determines the work to be performed and identifies the long-term physical needs of the project.
- If the remaining useful life of one or more major systems is less than the applicable period of affordability, MaineHousing will ensure that a replacement reserve is established and that adequate monthly payments are made to repair or replace the systems as needed.

At the onset of any project, MaineHousing will conduct on-site inspections with qualified inspectors on staff to identify any deficiencies using the current Real Estate Assessment Center (REAC) approved inspection protocol. Any identified deficiencies will be addressed in the renovation scopes of work. Follow-up inspections will be conducted at the completion of the project to assure any and all identified deficiencies have been properly addressed.

Attached are Inspectable Items and Observable Deficiencies using the current approved UPCS inspection protocol. This may change with the pending adoption and roll out of NSpire.

Lead-based Paint

Unless a property or housing unit is exempt from HUD's lead-based paint regulations at 24 CFR Part 35, as provided in §35.115, MaineHousing will require the following for rehabilitation activities assisted with HTF funds:

1. Prior to the start of any rehabilitation work at a project site, a lead-based paint (LBP) risk assessment by a Lead Risk Assessor certified by the Maine Department of Environmental Protection (Maine DEP), and paint testing on painted surfaces to be disturbed or replaced during rehabilitation activities, including housing units, common areas servicing the units, and exterior painted surfaces, will be conducted in accordance with the Part 35 requirements and established protocols under the Maine DEP's Lead Management Regulations – Chapter 424 (Maine DEP Lead Regulations), including a written report with findings, conclusions and recommendations.
1. If the LBP risk assessment indicates the presence of LBP, the Part 35 provisions for the level of federal rehabilitation assistance applicable to the project, and any related requirements of the Maine DEP Lead Regulations, will apply to the project, as follows:

- Projects receiving an average of \$5,000 or less per unit in federal rehabilitation assistance
- Projects receiving an average of over \$5,000 but no more than \$25,000 per unit in federal rehabilitation assistance.
- Projects receiving an average of more than \$25,000 per unit in federal rehabilitation assistance.

3. Ongoing LBP maintenance and re-evaluation in accordance with §35.1355 will be required if LBP has been identified on a project site.

HTF Rehab Standards Appendix A: Uniform Physical Condition Standards for Multifamily Housing Rehabilitation - October 2016

NOTE: Deficiencies highlighted in yellow are life-threatening and must be addressed immediately, if the deficiency occurs.		
Requirements for Site	Observable Deficiency	Type and Degree of Deficiency that must be addressed
Fencing and Gates	Observable Deficiency	Type and Degree of Deficiency that must be addressed
	Defective/Falling/Leaning	Fence or gate is missing or damaged in the point it does not function as it should
Grounds	Defective/Falling/Leaning	Fence or gate is missing or damaged in the point it does not function as it should
	Missing Sections	An exterior fence, security fence or gate is missing a section which could threaten safety or security
Health & Safety	Defective/Falling/Leaning	Fence or gate is missing or damaged in the point it does not function as it should
	Defective/Falling/Leaning	Fence or gate is missing or damaged in the point it does not function as it should
Marble/Project Joints	Defective/Falling/Leaning	Fence or gate is missing or damaged in the point it does not function as it should
	Defective/Falling/Leaning	Fence or gate is missing or damaged in the point it does not function as it should
Parking Lots/Driveways/Roads	Defective/Falling/Leaning	Fence or gate is missing or damaged in the point it does not function as it should
	Defective/Falling/Leaning	Fence or gate is missing or damaged in the point it does not function as it should
Play Areas and Equipment	Defective/Falling/Leaning	Fence or gate is missing or damaged in the point it does not function as it should
	Defective/Falling/Leaning	Fence or gate is missing or damaged in the point it does not function as it should
Refuse Disposal	Defective/Falling/Leaning	Fence or gate is missing or damaged in the point it does not function as it should
	Defective/Falling/Leaning	Fence or gate is missing or damaged in the point it does not function as it should
Retaining Walls	Defective/Falling/Leaning	Fence or gate is missing or damaged in the point it does not function as it should
	Defective/Falling/Leaning	Fence or gate is missing or damaged in the point it does not function as it should
Walkways/Steps	Defective/Falling/Leaning	Fence or gate is missing or damaged in the point it does not function as it should
	Defective/Falling/Leaning	Fence or gate is missing or damaged in the point it does not function as it should
Requirements for Building Exterior	Observable Deficiency	Type and Degree of Deficiency that must be addressed
	Defective/Falling/Leaning	Fence or gate is missing or damaged in the point it does not function as it should
Doors	Defective/Falling/Leaning	Fence or gate is missing or damaged in the point it does not function as it should
	Defective/Falling/Leaning	Fence or gate is missing or damaged in the point it does not function as it should
Fire Escapes	Defective/Falling/Leaning	Fence or gate is missing or damaged in the point it does not function as it should
	Defective/Falling/Leaning	Fence or gate is missing or damaged in the point it does not function as it should
Foundations	Defective/Falling/Leaning	Fence or gate is missing or damaged in the point it does not function as it should
	Defective/Falling/Leaning	Fence or gate is missing or damaged in the point it does not function as it should
Health and Safety	Defective/Falling/Leaning	Fence or gate is missing or damaged in the point it does not function as it should
	Defective/Falling/Leaning	Fence or gate is missing or damaged in the point it does not function as it should
Lighting	Defective/Falling/Leaning	Fence or gate is missing or damaged in the point it does not function as it should
	Defective/Falling/Leaning	Fence or gate is missing or damaged in the point it does not function as it should
Roofs	Defective/Falling/Leaning	Fence or gate is missing or damaged in the point it does not function as it should
	Defective/Falling/Leaning	Fence or gate is missing or damaged in the point it does not function as it should
Walls	Defective/Falling/Leaning	Fence or gate is missing or damaged in the point it does not function as it should
	Defective/Falling/Leaning	Fence or gate is missing or damaged in the point it does not function as it should
Windows	Defective/Falling/Leaning	Fence or gate is missing or damaged in the point it does not function as it should
	Defective/Falling/Leaning	Fence or gate is missing or damaged in the point it does not function as it should
Requirements for Building Systems	Observable Deficiency	Type and Degree of Deficiency that must be addressed
	Defective/Falling/Leaning	Fence or gate is missing or damaged in the point it does not function as it should
Domestic Water	Defective/Falling/Leaning	Fence or gate is missing or damaged in the point it does not function as it should
	Defective/Falling/Leaning	Fence or gate is missing or damaged in the point it does not function as it should
Electrical System	Defective/Falling/Leaning	Fence or gate is missing or damaged in the point it does not function as it should
	Defective/Falling/Leaning	Fence or gate is missing or damaged in the point it does not function as it should
Elevators	Defective/Falling/Leaning	Fence or gate is missing or damaged in the point it does not function as it should
	Defective/Falling/Leaning	Fence or gate is missing or damaged in the point it does not function as it should
Emergency Power	Defective/Falling/Leaning	Fence or gate is missing or damaged in the point it does not function as it should
	Defective/Falling/Leaning	Fence or gate is missing or damaged in the point it does not function as it should
Health & Safety	Defective/Falling/Leaning	Fence or gate is missing or damaged in the point it does not function as it should
	Defective/Falling/Leaning	Fence or gate is missing or damaged in the point it does not function as it should
HVAC	Defective/Falling/Leaning	Fence or gate is missing or damaged in the point it does not function as it should
	Defective/Falling/Leaning	Fence or gate is missing or damaged in the point it does not function as it should
Roof Exhaust System	Defective/Falling/Leaning	Fence or gate is missing or damaged in the point it does not function as it should
	Defective/Falling/Leaning	Fence or gate is missing or damaged in the point it does not function as it should
Sanitary System	Defective/Falling/Leaning	Fence or gate is missing or damaged in the point it does not function as it should
	Defective/Falling/Leaning	Fence or gate is missing or damaged in the point it does not function as it should
Requirements for Common Areas	Observable Deficiency	Type and Degree of Deficiency that must be addressed
	Defective/Falling/Leaning	Fence or gate is missing or damaged in the point it does not function as it should
Includes the Following	Defective/Falling/Leaning	Fence or gate is missing or damaged in the point it does not function as it should
	Defective/Falling/Leaning	Fence or gate is missing or damaged in the point it does not function as it should
Business/Office/Community Room	Defective/Falling/Leaning	Fence or gate is missing or damaged in the point it does not function as it should
	Defective/Falling/Leaning	Fence or gate is missing or damaged in the point it does not function as it should
Kitchen	Defective/Falling/Leaning	Fence or gate is missing or damaged in the point it does not function as it should
	Defective/Falling/Leaning	Fence or gate is missing or damaged in the point it does not function as it should
Lobby	Defective/Falling/Leaning	Fence or gate is missing or damaged in the point it does not function as it should
	Defective/Falling/Leaning	Fence or gate is missing or damaged in the point it does not function as it should
Office	Defective/Falling/Leaning	Fence or gate is missing or damaged in the point it does not function as it should
	Defective/Falling/Leaning	Fence or gate is missing or damaged in the point it does not function as it should
Other Community Spaces	Defective/Falling/Leaning	Fence or gate is missing or damaged in the point it does not function as it should
	Defective/Falling/Leaning	Fence or gate is missing or damaged in the point it does not function as it should
Party/Club/Reception	Defective/Falling/Leaning	Fence or gate is missing or damaged in the point it does not function as it should
	Defective/Falling/Leaning	Fence or gate is missing or damaged in the point it does not function as it should
Storage	Defective/Falling/Leaning	Fence or gate is missing or damaged in the point it does not function as it should
	Defective/Falling/Leaning	Fence or gate is missing or damaged in the point it does not function as it should

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-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”.

The grantee has determined its own affordable homeownership limits using the methodology described in § 93.305(a)(2) and the limits are attached.

N/A

11. Grantee Limited Beneficiaries or Preferences. Describe how the grantee will limit the beneficiaries or give preferences to a particular segment of the extremely low- or very low-income population to serve unmet needs identified in its consolidated plan or annual action plan. If the grantee will not limit the beneficiaries or give preferences to a particular segment of the extremely low- or very low-income population, enter “N/A.”

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.”

Projects that involve the rehabilitation of existing multifamily housing are subject to the following:

1. The Application must include a capital needs assessment satisfying the requirements set forth in the Capital Needs Assessment Requirements in Appendix C of the QAP.
2. The Rehabilitation Costs per unit of existing housing must be at least \$75,000.
3. The Project must comply with MaineHousing’s Temporary Relocation and Permanent Displacement Policies and, if the Project is federally-assisted, all applicable federal requirements, including the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended. The Applicant must take reasonable steps to minimize the displacement of existing tenants of the Project. The Application must identify any tenants who will be permanently displaced and the reason for the displacement. The Project’s TDC must include all costs associated with permanent and temporary displacement or relocation. MaineHousing will not allocate Credit until it has approved a project’s relocation plan.

Discussion:

Citizen Participation Comments

June 11, 2024 – Statewide homeless council

June 20, 2024 – CoC meeting

June 28, 2024 – Persons with lived experience committee meeting

July 26, 2024 – Public Housing Directors – held at Presque Isle Housing Authority

August 6, 2024 – Maine Affordable Housing Coalition

August 8, 2024 – Listening session @ MaineHousing followed by public hearing

Summary of Meetings

June 11, 2024 – Statewide homeless council

- Affordable housing needs: Increase supply of affordable housing; Increase Homeownership; Housing Rehabilitation; Preservation of Affordable Housing; and Rental Assistance
 - Population with highest need: Older adults; chronically homeless; persons with disabilities; minorities; no-citizens; larger families (five or more members) ; very low income < 30% AMI; and low to moderate income 51% to 80% AMI
 - STEPS vouchers were discussed – with the scarcity of vouchers, continuum of care housing resources are mostly given to unsheltered homeless individuals
 - Municipality incentives
 - HOME and HTF funding should be prioritized for the lowest-income households in Maine
 - Housing accessibility for very low-income households
 - Black, indigenous and persons of color communities
 - Survivors of domestic violence
 - Fair Housing Analysis discussion and the lack of progress constructing new affordable housing for large families (3-4 bedroom) – production goals devoted to larger units and intergenerational housing
 - Fair Housing Testing - (a formal process where different applicants from various demographics attempt to rent an apartment and compared to white or non-disabled applicants who attempt to rent the same unit are treated by landlords)
 - Transportation issues
 - Break the stigma of who lives in affordable housing
-

June 20, 2024 – Continuum of Care meeting

- Affordable housing needs: Increase supply of affordable housing; Increase Homeownership; Housing Rehabilitation; Preservation of Affordable Housing; and Rental Assistance
 - Population with highest need: Older adults; chronically homeless; persons with disabilities; minorities; no-citizens; larger families (five or more members) ; very low income < 30% AMI; and low to moderate income 51% to 80% AMI
 - Continue to support rental assistance to lease up with vouchers and funds to help families stay where they are and avoid homeless status
 - Barriers – funds and clients with unsuccessful lease up histories having the ability to find a landlord to lease them up. Most landlords will have 10 to 20 applicants to choose from
 - Another barrier is local ordinances that can increase costs of production which will in turn increase the rents
 - Transition aged youth 18-24 years old is a concerning populations
-

June 28, 2024 – Persons with lived experience committee meeting

- Need more units
 - Loss of housing navigation
 - Fair housing training offered by MaineHousing could be improved
 - Need more shelter beds
 - Consider non-congregate shelter options
-

July 26, 2024 – Public Housing Directors – held at Presque Isle Housing Authority

- Housing First model – supporting service providers
 - Financing shelters at the cost to run them;
 - Vouchers and services
 - Covid resources are gone – losing positions to continue service, consistent funding
 - Shelter staffing
 - Encampments were discussed: Expand knowledge to community leaders; help spread information about programs and services; NON-HCV rental assistance; emergency funding for rental assistance now that ERA is over
 - Workforce housing: construction, seasonal, nurses
 - Housing navigators and their roll after housing people
 - Future of property management at risk;
 - Consolidate Public Housing Authorities, share resources, work together
 - Aging State, encourage growth, worker shortage, encouraging growth between agencies, MaineHousing to facilitate collaboration
-

August 6, 2024 – Maine Affordable Housing Coalition Listening Session

- Fair housing impediments were discussed:
 - o Lowest income
 - o English not first language
 - o Zoning implications for family housing
 - o Substance abuse / disability / multiple disabilities
 - o Intersexual identity – justice involved individuals
 - o Landlords need education
 - o Sources of income – hard to use vouchers

 - Consolidated Plan Affordable Housing Issues:
 - o Equitable distribution of HUD housing dollars through all towns
 - o Transportation / parking
 - o Preservation strategy
 - o Private landlords need oversight when rehabbing units to ensure codes and standards are followed
 - o Scoring model is hard, hard to find sites, change model to reflect saturation in Portland
 - o Climate change
 - o Support household income growth
 - o Reactivate upper level spaces in urban areas
-

August 8, 2024 – listening session @ MaineHousing followed by public hearing

Consolidated Plan Items Discussed:

- Greatest barriers to increased production: NIMBYism, pre-development costs, municipal/zoning inconsistencies
- Supports, resources, policy, practices to address homelessness: supports for transition to permanent housing; emphasizing Housing First as best option; cohesive pro-housing theme (inclusive of landlords, etc.); statewide prevention/rapid response/adequate affordable housing available

Fair Housing Items Discussed:

- Disability Office has a goal to educate people on existing housing
- Need more affordable housing options
- Need community integrated housing situations with supports
- Need housing for larger families (Hancock County)
- Don't forget LD 2003 - Zoning

Fair Housing Impediments Mentioned in Brainstorm:

- Smaller landlords need rehab money to accommodate people with disability
- Transportation is important
- Paperwork Issues for non-citizens.



MaineHousing
MAINE STATE HOUSING AUTHORITY

STATE OF MAINE
ANALYSIS OF IMPEDIMENTS
TO
FAIR HOUSING CHOICE

October 2024

If you feel you have experienced discrimination
in the housing industry, please contact:

Maine Human Rights Commission
Office of the Commission
51 State House Station
Augusta, Maine 04330
Telephone: 207-624-6290
e-mail: info@mhrc.maine.gov

Boston Regional Office of FHEO
U.S Department of Housing and Urban Development
Thomas P. O'Neil, Jr. Federal Building
10 Causeway Street, Room 308
Boston, Massachusetts 02222-1092
Telephone: (617) 994-8300
Toll Free: (800) 827-5005
TTY: (800) 877-8339

Table of Contents

Executive Summary	4
Legal Framework	8
State and Federal Fair Housing Laws Comparison	9
Legislative Updates	23
Assessment of Fair Housing Data	27
FAIR HOUSING COMPLAINTS	27
DEMOGRAPHICS, INCOME, AND THE RESIDENTIAL HOUSING MARKET	30
Identified Impediments to Fair Housing Choice.....	41
Action Plan	Error! Bookmark not defined.

Analysis of Impediments to Fair Housing Choice

Jurisdiction: Maine

Date: October 11, 2024

Executive Summary

Overview

The State of Maine is committed to affirmatively furthering fair housing. As a recipient of federal housing funding from the U.S. Department of Housing and Urban Development (HUD), Maine is required to analyze impediments to fair housing choice and then specify planned actions that will help to overcome the identified impediments. Maine's Analysis of Impediments to Fair Housing Choice (AI) is intended to satisfy this requirement and to ensure ongoing progress in reduction and elimination of barriers to full and equal access to safe, warm, affordable housing for all residents of Maine.

HUD defines impediments to fair housing choice as set forth in local, state and federal law. In Maine, impediments include:

- Any actions, omissions, or decisions taken because of race, color, sex, sexual orientation, gender identity, physical or mental disability, familial status, religion, ancestry, or national origin which restrict housing choices (direct discrimination).
- Any actions, omissions, or decisions which have the effect of restricting housing choices on the basis of race, color, sex, sexual orientation, gender identity, physical or mental disability, familial status, religion, ancestry, or national origin (indirect discrimination).

The State AI is intended to:

- Serve as the substantive, logical basis for informed housing planning and development.
- Provide essential and detailed information to policymakers, administrative staff, housing providers, lenders, and fair housing advocates who have an obligation, or moral imperative, to address impediments to fair housing choice.
- Assist in building public support for fair housing efforts.

Lead Agency

The Maine State Housing Authority (MaineHousing) is responsible for the preparation and primary implementation of Maine's AI.

Consultation

Over the course of the past year, MaineHousing has held focused discussions with our partners and others about affordable housing and impediments to that housing, with participation throughout from the Maine Department of Economic and Community Development. Further, MaineHousing solicited input from all interested members of the public via an online survey, promoted via partners and public organizations as well as a press release and social media platforms. Below is a list of topics discussed or surveyed, and the organizations or parties participating in those discussions.

1. Homeless, Hard to House Populations

- Maine's Continuum of Care
- Maine's Statewide Homeless Council
- Directors of Maine's homeless shelters
- Publicly funded institutions and systems of care
- Persons with lived experience

2. Affordability

- Maine Affordable Housing Coalition
- Business and Civic Leaders
- Public Housing Authorities
- Efficiency Maine
- Interested members of the public

3. Community Development

- Local Governments
- Maine Municipal Association
- Maine Community Development Association
- Public Housing Authorities
- Maine Chapter of the American Association of Retired Persons
- Interested members of the public

4. Low Income/Special Needs Residents

- Area Agencies on Aging
- Maine Council to End Domestic Violence
- Interested members of the public

5. Protected Class Members, Fair Housing

- Maine Human Rights Commission
- Pine Tree Legal
- Disability Rights Council

- Maine Department of Health and Human Services
- Maine Equal Justice
- Maine’s Permanent Commission on the Status of Racial, Indigenous, and Tribal Populations
- Interested members of the public

6. Housing Quality

- Maine Community Action Agencies
- Interested members of the public

Methodology

The methodology for the State of Maine AI includes the following components:

- A review of the Legal Framework under which Fair Housing laws are enforced.
- An Assessment of Fair Housing Data, which reviews Fair Housing complaints alongside economic, demographic, and housing data in Maine.
- A summary of Identified Impediments to Fair Housing Choice.
- A detailed Action Plan to address the identified impediments.

Identified Impediments to Fair Housing Choice

In the identification of impediments, MaineHousing includes both significant concerns and established impediments. We define concerns and impediments as follows:

- A concern is any issue that may substantially contribute to the creation of an impediment.
- An impediment has the effect of limiting the availability of housing choice on the basis of race, color, sex, sexual orientation, gender identity, physical or mental disability, familial status, religion, ancestry, or national origin.

Based on the review of evidence, surveys, and discussions with the public that was conducted for the State of Maine AI, MaineHousing found that the following impediments to Fair Housing remain salient issues in Maine.

1. **Lack of affordable housing.** Maine has a well-identified shortage of available housing, which is causing an affordability crisis. Housing cost burden has increased among renters and homeowners. Additionally, with the oldest median age in the nation, Maine needs a stock of housing available for in-migration, domestic or foreign, to sustain its labor markets.
2. **Barriers for protected classes.** While Maine’s population remains predominantly white, there are growing subpopulations with diverse racial, ethnic, and cultural backgrounds. There

is also increasing awareness of a variety of gender, sexual, and religious identities. This growing diversity reveals new barriers and sheds new light on existing barriers.

3. **Lack of availability and access to housing for persons with disabilities.** Maine's reported rate of disability is nearly 30% higher than the national average. The lack of accessible units was raised in public comments and the Fair Housing surveys, and the need for accessible housing is only expected to increase as a result of Maine's aging population.
4. **Community planning and zoning decisions that impede affordable housing.** Many local ordinances meant to limit density have the effect of excluding new residents from access to high opportunity areas. Action by local officials is needed to address these barriers, re-examining planning and zoning policies that may have a disparate impact.
5. **Limited access to neighborhood opportunities and community assets.** Shifting economic conditions mean that many households, in addition to struggling with affordability, simply can't access housing in proximity to the jobs, education, healthcare, or other community assets or opportunities that are needed.
6. **Lack of understanding of fair housing and availability of programs that affirmatively further fair housing.** Educational efforts need to continue to assist public and private entities to comply with state and federal laws regarding housing discrimination, while also ensuring the households understand their rights.

Legal Framework

The Maine Human Rights Act (“MHRA”), 5 M.R.S. §4551 et seq., is Maine’s anti-discrimination law that prohibits discrimination on the basis of a protected class in employment, housing, places of public accommodation, education, and the extension of credit. The MHRA mirrors the major provisions of the Federal Fair Housing Act (“FFHA”), the Americans with Disabilities Act of 1990 (“ADA”), and Section 504 of the Rehabilitation Act of 1973 (“Section 504”), extending protections to classifications not covered under the federal laws, as described below. The Maine Human Rights Commission (the *Commission*) is charged with enforcing the MHRA with the purpose “to keep continually in review all practices infringing on the basic human right to a life with dignity, and the causes of these practices, so that corrective measures may, where possible, be promptly recommended and implemented.” The Commission attempts to resolve complaints, to interpret the MHRA, to provide administrative guidance, and to enforce the MHRA in the public interest.

Over the last several years there have been substantial amendments to the MHRA. The MHRA was expanded to include gender identity as a protected class (§§4552, 4571, 4572, 4573-A, 4581, 4581-A, 4583, 4591, 4592, 4595, 4596). Additionally, in employment, as it relates to the extension of credit and access to public accommodations, the MHRA was expanded to include a prohibition on the basis of age, and with respect to employment and housing on the basis of familial status (§4552). The MHRA was also amended to prevent discrimination or retaliation on the basis of an assertion of rights under the MHRA (§4552).

The 2023 Second Regular Session of the 131st Legislature, which convened January 3, 2024 and adjourned April 17, 2024 made a few additional changes to the MHRA which were procedural in nature:

- 5 M.R.S. §4603, Rulemaking; review, was amended to add “On or before January 15, 2024 and at least once every 10 years thereafter, the Commissioner of Education and the commission shall jointly review rules adopted pursuant to this section and, if the Commissioner of Education and the commission determine that those rules must be amended to reflect changes in statute and best practices to ensure an individual's right to freedom from discrimination in education, the Commissioner of Education and the commission shall as soon as practicable initiate rulemaking in accordance with this section.”
- 5 M.R.S. §4612, Procedure on Complaints, was amended to update the right-to-sue letter language providing clarification on when the Commission will issue a letter and when an investigation will end.
- 5 M.R.S. §4613, Procedure in Superior Court, was amended to raise the dollar threshold limits for compensatory damages.
- 5 M.R.S. §4622, Limitations on attorneys’ fees and damages; procedures, was updated add “If the commission issued a right-to-sue letter, the plaintiff may not be awarded attorney's fees, civil penal damages or compensatory and punitive damages unless the plaintiff establishes that the plaintiff received the right-to-sue letter before filing the civil action.”

The Commission also proposed Rule amendments to the Procedural Rule (Chapter 2), the Employment Rule (Chapter 3), the Public Accommodations Rule (Chapter 7), and the Housing Rule (Chapter 8) to reflect current practices and changes made to the MHRA over the last several years.

State and Federal Fair Housing Laws Comparison

<p>Maine Human Rights Act (5 M.R.S. § 4551 et seq.) ("MHRA")</p>	<p>Prohibitions</p> <p>Prohibits discrimination in employment, housing, education, the extension of credit, or access to public accommodations based on:</p> <ul style="list-style-type: none"> • Race • Color • Sex, sexual orientation or gender identity • Physical or mental disability • Religion • Ancestry or national origin <p>Additionally:</p> <p>In employment, the extension of credit and access to public accommodations prohibits discrimination on the basis of:</p> <ul style="list-style-type: none"> • Age <p>In employment and housing prohibits discrimination on the basis of:</p> <ul style="list-style-type: none"> • Familial status <p>In employment prohibits discrimination on the basis of:</p> <ul style="list-style-type: none"> • Previous assertion of a claim or right against a prior employer because of a protected activity. <p>Prohibits discrimination or retaliation on the basis of an assertion of rights under the MHRA or interference with an individual's right to be free from discrimination prohibited under the MHRA.</p>
	<p>Definition of Physical or Mental Disability</p> <p>Defines "physical or mental disability" in broader terms than the FFHA, ADA or Section 504 to include:</p> <ul style="list-style-type: none"> • A physical or mental impairment that substantially limits one or more of a person's major life activities, significantly impairs physical or mental health, or requires special education, vocational rehabilitation or related services.
	<p>Public Assistance</p> <p>Prohibits landlords and public accommodations from refusing to rent to or imposing different rental terms on individuals who receive federal, state, or local public assistance primary because of the individual's status as a recipient.</p>
	<p>Exemptions</p> <p>The MHRA includes exemptions for:</p>

	<ul style="list-style-type: none"> • Housing for older adults from the prohibition against familial discrimination • Occupancy limitations in non-commercial housing owned and operated by religious organizations for its membership unless the membership is restricted because of race, color or national origin • The rental of a single-family unit in an owner-occupied two-family dwelling and the rental of four or fewer rooms in an owner-occupied single-family dwelling without a broker
	<p>Advertising</p> <p>Prohibits discriminatory advertising in all housing.</p>
	<p>Assistance Animals & Service Animals</p> <p>An Assistance Animal is an animal that has been determined necessary for an individual with physical or mental disability to mitigate the effects of a physical or mental disability by a licensed health professional with knowledge of the disability-related need or an animal individually trained to do work or perform tasks for the benefit of an individual with a physical or mental disability.</p> <p>A Service Animal is a dog that is individually trained to do work or perform tasks for the benefit of an individual with a disability. Other species of animals are not service animals. The work or tasks performed must be directly related to the individual's disability. Crime deterrent effects, emotional support, well-being, comfort and companionship do not constitute work or tasks for the purpose of classifying a dog as a Service Animal.</p> <p>The MHRA prohibits discrimination in housing based on a person's use of an assistance animal and prohibits discrimination against a person's use of a service animal in public places.</p>
	<p>Reasonable Accommodations</p> <p>A reasonable accommodation may include making existing facilities used by employees readily accessible to and useable by individuals with disabilities and job restructuring, part-time or modified work schedules, reassignment, leaves of absence, acquisition or modification of equipment or devices, appropriate adjustment or modifications of examinations, training materials or policies, the provision of qualified readers or interpreters and other similar accommodations for individuals with disability.</p> <p>Reasonable accommodations may not be considered reasonable if the entity can demonstrate that making the modifications or taking certain steps would fundamentally alter the nature of the services being provided or would result in an undue burden.</p>

Accessibility

Multifamily Housing with 4 or more dwelling units

New Construction Requirements

At least one accessible entrance on an accessible route into and throughout the project.

Accessible public and common use areas.

All dwelling units must be adaptable unless structurally unable to do so. For multistory buildings with an elevator, all units must be adaptable. For multistory buildings without an elevator, all of the first floor units must be adaptable.

At least 2% of all parking spaces must be accessible.

Rehabilitation Requirements

New construction requirements apply to substantial rehabilitation (rehabilitation equal to 75% or more of replacement cost)

Publicly Funded Housing with 20 or more units on a single parcel

New Construction Requirements

At least 10% of ground floor* units and at least 10% of upper floor units must be accessible for persons with mobility impairments. If there is no elevator, then only 10% of the ground floor* units must be accessible for persons with mobility impairments. In addition, at least 2% of the units must be accessible persons with hearing/visual impairments – no overlap with 10% requirement.

*ground floor includes first floor with units (which may not be the first floor of the building) and all floors at grade level, which may be more than one floor.

Parking - generally, one space for each unit with accessible mobility features and at least one van space for each 6 accessible spaces. If less than 1:1 parking, pro rate based on the number of units with accessible mobility features.

Rehabilitation Requirements

	<p>Same number of units as new construction requirements, but only required to provide accessible routes, accessible doors, adaptable bathrooms, and tactile warnings on doors to hazardous areas.</p> <p>Complaint Process</p> <p>Any person who believes they have been subjected to unlawful discrimination covered by the MHRA may file a complaint with the Commission.</p> <p>The complaint should be filed as soon as possible after the act of discrimination occurs, but must be filed within 300 days of the date of discrimination.</p> <p>Once a complaint is received, the Commission provides a copy to the Respondent along with a Request for Information and Documents. Following receipt of an answer from the Respondent and the requested documentation, an investigator is assigned to each case.</p> <p>The investigator holds a fact-finding conference to discuss the facts of the case. Both the Complainant and the Respondent attend as well as any witnesses that may be relevant to the discussion of facts.</p> <p>The parties may agree to a settlement that resolves the issues raised in the complaint. If a settlement is not reached, the investigator will write an Investigator’s Report and make a recommendation to the Commission.</p> <p>If either party objects to the recommendation provided by the investigator they must file a written submission of disagreement. The Commission will review the Investigator’s Report and any submissions of disagreement and listen to oral argument before voting on a case at a scheduled Commission Meeting, which is open to the public.</p>
<p>Federal Fair Housing Act (42 U.S.C. §§ 3601-19) (“FFHA”)</p>	<p>Prohibitions</p> <p>Protects people from discrimination when they are renting or buying a home, getting a mortgage, seeking housing assistance, or engaging in other housing-related activities.</p> <p>Prohibits discrimination in housing because of:</p> <ul style="list-style-type: none"> • Race • Color • National origin • Religion • Sex (including gender identity and sexual orientation) • Familial Status • Disability

	<p>Examples of actions that constitute illegal discrimination when taken because of race, color, religion, sex (including gender identity and sexual orientation), disability, familial status or national origin:</p> <p>1) Sale & Rental Housing:</p> <ul style="list-style-type: none"> • Refusal to rent or sell housing • Refusal to negotiate for housing • Making housing unavailable • Setting different terms, conditions or privileges for sale or rental • Providing different housing services or facilities • Falsely denying housing is available • Making, publishing or printing notices, advertisements or statements that indicates preferences, limitations or discrimination • Using different qualification criteria • Evicting a tenant or a tenant’s guest <p>2) Mortgage Lending:</p> <ul style="list-style-type: none"> • Refusal to make a mortgage loan • Refusal to provide information regarding loans • Imposition of different terms or conditions on a loan • Refusal to purchase a loan • Discriminating in appraising a dwelling <p>3) Harassment</p> <p>4) Threats, coercion, intimidation or interference with anyone exercising a fair housing right or assisting other who exercise the right</p> <p>5) Retaliation against a person who filed a fair housing complaint</p>
	<p>Definition of Persons with Disabilities</p> <p>The FFHA defines a person with a disability to include: Individuals with a physical or mental impairment that substantially limits one or more major life activities, who are regarded as having such an impairment and have a record of such an impairment.</p>
	<p>Protections for Persons with Disabilities</p> <p>Provides additional protections for Persons with Disabilities requiring housing providers to make reasonable accommodations and allow reasonable modifications that may be necessary to allow persons with disabilities to enjoy their housing.</p> <p>Also requires certain multifamily housing to be accessible to persons with disabilities.</p>

	<p>Exemptions</p> <p>The FFHA includes exemptions for:</p> <ul style="list-style-type: none"> • Housing for older adults from the prohibition against familial discrimination • Occupancy limitations in non-commercial housing owned and operated by religious organizations for its membership unless the membership is restricted because of race, color, or national origin • The sale or rental of single family homes by an owner who does not own more than 3 homes at one time and without a broker • Rooms or units in owner-occupied multifamily housing with four or fewer units
	<p>Advertising</p> <p>Prohibits discriminatory advertising in all housing.</p>
	<p>Service Animals</p> <p>Individuals with a disability may request to keep an assistance animal as a reasonable accommodation to a housing provider’s pet restrictions. Housing providers cannot refuse to make reasonable accommodations in rules, policies, practices or services when such accommodations may be necessary to afford a person with a disability the equal opportunity to use and enjoy a dwelling.</p> <p>The FFHA requires a housing provider to allow a reasonable accommodation involving an assistance animal in situations that meet the following conditions:</p> <ul style="list-style-type: none"> • A request was made to the housing provider by or for a person with a disability • The request was supported by reliable disability-related information, if the disability and the disability-related need for the animal were not apparent and the housing provider requested such information, and • The housing provider has not demonstrated that: <ul style="list-style-type: none"> ○ Granting the request would impose an undue financial and administrative burden on the housing provider ○ The request would fundamentally alter the essential nature of the housing provider’s operations ○ The specific assistance animal in question would pose a direct threat to the health or safety of others despite any other reasonable accommodations that could eliminate or reduce the threat ○ The request would result in significant physical damage to the property of others despite any other reasonable accommodations that could eliminate or reduce the physical damage

	<p>Reasonable Accommodations</p> <p>A reasonable accommodation is a change, exception, or adjustment to a rule, policy, practice, or service that may be necessary for a person with a disability to have an equal opportunity to use and enjoy a dwelling, including public and common use spaces.</p> <p>Reasonable accommodations may be denied if the request was not made by or on behalf of a person with a disability or if there is no disability related need for accommodation. Additionally, a request may be denied if it is not reasonable, meaning it would impose an undue financial burden on the housing provider or it would fundamentally alter the nature of the provider’s operations.</p>
	<p>Accessibility</p> <p><u>Multifamily Housing with 4 or more dwelling units</u></p> <p><i>New Construction Requirements</i></p> <p>At least one accessible entrance on an accessible route into and throughout the project.</p> <p>Accessible public and common use areas.</p> <p>All dwelling units must be adaptable unless structurally unable to do so. For multistory buildings with an elevator, all units must be adaptable. For multistory buildings without an elevator, all of the first floor units must be adaptable.</p> <p>At least 2% of all parking spaces must be accessible.</p> <p><i>Rehabilitation Requirements</i></p> <p>None. Only applies to new construction.</p>
	<p>Complaint Process</p> <p>Complaints can be filed with the Office of Fair Housing and Equal Opportunity (“FHEO”) by writing a letter that includes the Complainant’s name and address, address of the house or apartment that the Complainant was trying to rent or buy, date of the incident, and a short description of what happened. Complaints may also be filed online or by telephone.</p> <p>All allegations must be filed within one year of the last date of the alleged discrimination.</p> <p>The FHEO will begin the investigation process shortly after receiving an allegation. Through the investigation process the FHEO will assist and</p>

	encourage parties to reach an agreement. If an allegation cannot be resolved voluntarily, the FHEO may issue finding from the investigation. If the law has been violated, HUD or the Department of Justice may take legal action to enforce the law.
Title VI of the Civil Rights Act of 1964 (42 U.S.C. § 2000d et seq.)	Prohibitions Prohibits discrimination in programs and activities receiving federal financial assistance on the basis of: <ul style="list-style-type: none"> • Race • Color • National Origin
Executive Order 13166 – Improving Access to Services for Persons with Limited English Proficiency	Seeks to ensure that persons with limited English proficiency are guaranteed equal access to federally-assisted programs through the provision of appropriate language assistance services (i.e. interpreters or written translation of documents).
Section 504 of the Rehabilitation Act of 1973 (29 U.S.C. § 794) (“Section 504”)	Prohibitions No otherwise qualified individual with a disability shall, solely by reason of their disability, be excluded from the participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving federal financial assistance or under any program or activity conducted by any executive agency or the United States Postal Service. Definition of Disability An individual with a disability is any person who has a physical or mental impairment that substantially limits one or more major life activities. The term physical or mental impairment may include, but is not limited to, conditions such as visual or hearing impairment, mobility impairment, HIV infection, developmental disabilities, drug addiction, or mental illness. In general, the definition of “person with disabilities” does not include current users of illegal controlled substances. However, individuals would be protected under Section 504 (as well as the ADA) if a purpose of the specific program or activity is to provide health or rehabilitation services to such individuals. The term “major life activity” may include, but is not limited to, seeing, hearing, walking, breathing, performing manual tasks, caring for oneself, learning, speaking, or working. Definition of “program or activity” All of the operations of the following, any part of which is extended federal financial assistance: <ul style="list-style-type: none"> • A department, agency, special purpose district or other instrumentality of a state or of a local government • The entity of such state or local government that distributes such assistance

	<ul style="list-style-type: none"> • A college, university, or other postsecondary institution or a public system of higher education • A local educational agency, vocational education or other school system • An entire corporation, partnership, or other private organization, or an entire sole proprietorship if assistance is extended to such entity or such entity is principally engaged in the business of providing education, health care, housing, social services or parks and recreation • An entire plant or other comparable, geographically separate facility to which federal financial assistance is extended • Any other entity which is established by two or more entities described above
	<p>Modifications</p> <p>Requires that landlords provide reasonable modifications (i.e. structural changes) and other accommodations to persons with disabilities. Recipients of federal financial assistance must pay for the cost of modifications or structural changes.</p>
	<p>Service Animals</p> <p>Individuals with a disability may request to keep an assistance animal as a reasonable accommodation to a housing provider's pet restrictions.</p>
	<p>Reasonable Accommodations</p> <p>A reasonable accommodation is a change, adaptation, or modification to a policy, program, service, or workplace which will allow a qualified person with a disability to participate fully in a program, take advantage of a service, or perform a job.</p> <p>In order to show that a requested accommodation may be necessary, there must be an identifiable relationship, or nexus, between the requested accommodation and the individual's disability.</p> <p>Whether a particular accommodation is reasonable depends on a variety of factors and must be decided on a case-by-case basis. The determination of whether a requested accommodation is reasonable depends on the answers to two questions. First, does the request impose an undue financial and administrative burden on the housing provider? Second, would making the accommodation require a fundamental alteration in the nature of the provider's operations? If the answer to either question is yes, the requested accommodation is not reasonable. However, even where a housing provider is not obligated to provide a particular accommodation because the particular accommodation is not reasonable, the provider is still obligated to provide other requested accommodations or alternative accommodations to the one initially requested that do qualify as reasonable.</p>

Accessibility

Federally-assisted multifamily housing with 5 or more dwelling units

New Construction Requirements

At least one accessible entrance on an accessible route into and throughout the project.

Accessible public and common use areas. If the building has multiple floors and no elevator or accessibility to the upper floors, at least one of each amenity must be on the first floor and must be accessible.

At least 5% of units accessible for persons with mobility impairments **plus** at least 2% of units must be accessible for persons with hearing/visual impairments – no overlapping units.

Rounding: Always round the number of units up. Ex. 21 units * 5% = 1.05, rounded up is 2 units.

Scattered Sites: To the maximum extent feasible and subject to reasonable health and safety requirements, accessible units must be distributed throughout the project and sites and available in a sufficient range of sizes and amenities so that choice of living arrangements is, as a whole, comparable to and integrated with those available to other residents.

Parking varies based on type and number of spaces - generally, at least one accessible space for each unit with accessible mobility features and at least one van space for each 6 accessible spaces. If less than 1:1 parking, pro rate based on the number of units with accessible mobility features.

Rehabilitation Requirements

New construction requirements apply to substantial rehabilitation (rehabilitation equal to 75% or more of replacement cost) of housing with 15 or more units.

For other rehabilitation, all alterations must be made accessible until new construction requirements are met. This means every element or feature that is altered in **every unit** must be made accessible in accordance with the new construction requirements. In these situations developers should comply with the new construction requirements as it is usually more cost-effective and avoids partially accessible units.

Complaint Process

If an individual believes they have been discriminated against in programs or activities that the U.S. Department of Health and Human Services (“HHS”)

	<p>operates or to which HHS provides federal financial assistance, they may file a complaint with the Office of Civil Rights (“OCR”). The complaint may be filed for the individual or someone else.</p> <p>If the individual believes they have been discriminated against because of a disability by a state or local government health care or social services agency, they may file a complaint with OCR on behalf of themselves or someone else.</p> <p>For housing, complaints are handled by the U.S. Department of Housing and Urban Development’s Office of Fair Housing and Equal Opportunity.</p> <p>Once a complaint is received by OCR it has the legal authority to review and investigate the complaint. The investigation may include interviewing witnesses and the Complainant, obtaining documentation, and making visits to appropriate sites.</p> <p>Following the investigation, OCR issues a letter presenting its decision. If an individual’s rights were violated, the health care provider or state or local government agency will be granted a specific time period to correct the violation or OCR will provide a plan of correction.</p> <p>If the health care provider or state or local government agency is unwilling to take corrective action, the OCR will recommend initiating enforcement proceedings.</p>
<p>Title II of the Americans with Disabilities Act of 1990 (42 U.S.C. §§ 12131-12165) (“ADA”)</p>	<p>Prohibitions</p> <p>Prohibits discrimination based on disability in programs and activities provided or made available by public entities.</p> <p>This includes housing when the housing is provided or made available by a public entity regardless of whether the entity receives federal financial assistance.</p> <p>Prohibits private entities that own, lease, and operate places of public accommodation from discriminating on the basis of disability and requires places of public accommodation and commercial facilities to be designed, constructed, and altered in compliance with established accessibility standards.</p> <p>Definition of Disability</p> <p>A person who has a physical or mental impairment that substantially limits one or more major life activities, a person who has a history or record of such an impairment, or a person who is perceived by others as having such an impairment.</p>

	<p>Effective Communication</p> <p>The ADA requires state and local governments and businesses and nonprofit organizations that serve the public to communicate effectively with individuals who have vision, hearing, or speech disabilities (“communication disabilities”). This includes providing appropriate auxiliary aids and services as needed.</p> <p>Service Animals</p> <p>Businesses and nonprofits that are open to the public as well as state/local governments must allow service animals to go most places where the public can go.</p> <p>This also applies to certain types of housing:</p> <ul style="list-style-type: none"> • Housing at public and private universities • Public housing programs run by state, county, and city governments • Emergency shelters <p>Reasonable Accommodations</p> <p>Requires public entities and public accommodations to make reasonable modifications to policies, practices, or procedures to avoid discrimination.</p> <p>This requirement applies unless the public entity can demonstrate that the modifications would fundamentally alter the nature of its service, program, or activity.</p> <p>Accessibility</p> <p><u>State or local government assisted housing and public accommodations. (No threshold number of dwelling units).</u></p> <p><i>New Construction Requirements</i></p> <p>At least one accessible entrance on an accessible route into and throughout the project.</p> <p>Accessible public and common use areas. If the building has multiple floors and no elevator or accessibility to the upper floors, at least one of each amenity must be on the first floor and must be accessible.</p> <p>At least 5% of units accessible for persons with mobility impairments plus at least 2% of units must be accessible for persons with hearing/visual impairments – no overlapping units.</p> <p>Rounding: Always round the number of units up. Ex. 21 units * 5% = 1.05, rounded up is 2 units.</p>
--	--

	<p>Scattered Sites: For projects with more than 15 units in total over multiple sites, each site must meet the 5% and 2% requirements. If there are 15 or fewer units, the requirements apply to the total number of units even if it is a scattered site.</p> <p>Parking varies based on type and number of spaces - generally, at least one accessible space for each unit with accessible mobility features and at least one van space for each six accessible spaces. If more than 1:1 parking, add 2% of excess parking. If less than 1:1 parking, pro rate based on the number of units with accessible mobility features.</p> <p><i>Rehabilitation Requirements</i></p> <p>New construction requirements apply to vacant buildings with 15 or more units.</p> <p>New construction requirements apply to substantial rehabilitation (rehabilitation equal to 75% or more of replacement cost) of housing with 15 or more units.</p> <p>For other rehabilitation, all alterations must be made accessible until new construction requirements are met. This means every element or feature that is altered in every unit must be made accessible in accordance with the new construction requirements. In these situations developers should comply with the new construction requirements as it is usually more cost-effective and avoids partially accessible units.</p> <p>Complaint Process</p> <p>An individual who believes that they or someone else was discriminated against based on a disability can file an ADA complaint against a state or local government or a private business that serves the public.</p> <p>Depending on the type of complaint, the Complainant may file a complaint with the appropriate agency online or by mail. https://www.ada.gov/file-a-complaint/</p> <p>After a complaint is filed, it may be referred to the ADA Mediation Program or a federal agency that handles the types of issues raised in the complaint. Complainants may also be contacted for more information. An investigation may occur if it is warranted.</p> <p>If it is determined the law has been broken and no settlement is reached, a lawsuit or other enforcement action may occur.</p>
<p>Executive Order 11063 – Equal Opportunity in Housing</p>	<p>Prohibits discrimination in the sale, rental, leasing, or other disposition of properties and facilities owned or operated by the federal government or provided with federal funds against individuals on the basis of:</p>

	<ul style="list-style-type: none"> • Race • Color • Religion • Sex • National origin
<p>Violence Against Woman Act (42 U.S.C. § 14043e-11) (“VAWA”)</p>	<p>Prohibitions</p> <p>Provides housing protections and prohibits housing discrimination for victims of domestic violence, dating violence, sexual assault, and stalking in many of HUD’s housing programs.</p> <p>Housing Protections</p> <p>Under VAWA, someone who has experienced domestic violence, dating violence, sexual assault, and/or stalking:</p> <ul style="list-style-type: none"> • Cannot be denied admission to or assistance under a HUD-subsidized or assisted unit or program because of the VAWA violence/abuse committed against them • Cannot be evicted from a HUD-subsidized unit nor have their assistance terminated because of the VAWA violence/abuse committed against them • Cannot be denied admission, evicted, or have their assistance terminated for reasons related to the VAWA violence/abuse, such as having an eviction record, criminal history, or bad credit history • Must have the option to stay in their HUD-subsidized housing, even if there has been criminal activity directly related to the VAWA violence/abuse • Can request an emergency transfer from the housing provider for safety reasons related to the VAWA violence/abuse committed against them • Must be allowed to move with continued assistance, if the survivor has a Section 8 Housing Choice Voucher • Must be able to provide proof to the housing provider by self-certifying using the HUD VAWA Self-certification (Form HUD-5382), and not be required to provide more proof unless the housing provider has conflicting information about the violence/abuse • Must receive HUD's Notice of VAWA Housing Rights (Form HUD-5380) and HUD's VAWA Self-certification Form (Form HUD-5382) from the housing provider, when they are denied admission to a HUD-subsidized unit or HUD program, when they are admitted to a HUD-subsidized unit or HUD program, and when they receive a notice of eviction from a HUD-subsidized unit or notice of termination from a HUD program • Has a right to strict confidentiality of information regarding their status as a survivor

	<ul style="list-style-type: none"> • Can request a lease bifurcation from the owner or landlord to remove the perpetrator from the lease or unit, and if the housing provider bifurcates, it must be done consistent with applicable federal, state, or local laws and the requirements of the HUD housing program • Cannot be coerced, intimidated, threatened, or retaliated against by HUD-subsidized housing providers for seeking or exercising VAWA protections • Has the right to seek law enforcement or emergency assistance for themselves or others without being penalized by local laws or policies for these requests or because they were victims of criminal activity
	<p>HUD Covered Programs</p> <p>VAWA applies to:</p> <ul style="list-style-type: none"> • Public Housing • Housing Choice Voucher • Project-based Section 8 • Section 8 Moderate Rehabilitation Single Room Occupancy (SRO) • Section 202 Supportive Housing for the Elderly • Section 202 Direct Loan • Section 811 Supportive Housing for Persons with Disabilities • Housing Opportunities for Persons With AIDS (HOPWA) • HOME Investment Partnerships (HOME) • Emergency Solutions Grants • Continuum of Care • Section 221(d)(3)/(d)(5) Below-market Interest Rate (BMIR) Multifamily Rental Assistance • Section 236 Multifamily Assistance • Housing Trust Fund

Legislative Updates

Legislation enacted or rolled into supplemental funding in Maine over the period from 2019 to 2024 has implemented numerous efforts to address fair housing and housing access more generally, as noted below by legislative session:

129th Legislature

- LD 1318 directed Maine’s DHHS to examine opportunities available pursuant to a home and community-based services federal waiver available including, but not limited to, a state plan amendment to provide housing-related services to persons experiencing chronic homelessness who have mental health or substance use disorders and other vulnerable populations; and to collaborate with MaineHousing to leverage resources more effectively to

address the housing needs of persons experiencing chronic homelessness with mental health and/or substance use disorder challenges and other vulnerable populations.

- LD 1523 directs MaineHousing to create a short-term rental subsidy pilot project for persons recovering from substance use disorder to reside in a certified recovery residence that provides medication-assisted treatment.

130th Legislature

- LD 2 requires, upon the request of certain acting parties, that pertinent material be evaluated to prepare a racial impact statement (assessment of the potential impact that legislation could have on historically disadvantaged racial populations), and to study the best method to establish and implement a system of using racial impact statements for legislation.
- LD 484 changed the distribution of revenue from the real estate transfer tax on property transfers by deeds to increase the distribution to the MaineHousing for deposit in the Housing Opportunities for Maine Fund.
- LD 609 established through resolve a Commission To Increase Housing Opportunities in Maine by Studying Zoning and Land Use Restrictions to investigate low-income and middle-income housing shortages, state laws that affect the local regulation of housing and efforts in other states and municipalities to address housing shortages; to consider measures that would encourage increased housing options in the State; and to review and consider the historical role of race and racism in zoning policies and the best measures to ensure that state and municipal zoning laws do not serve as barriers to racial equality.
- LD 819 established the Maine Gold Standard for Radon Testing and Mitigation Initiative within the Department of Health and Human Services to encourage landlords, homeowners, and home builders to participate in radon testing and mitigation activities.
- LD 964 requires recovery residences to be certified according to national standards to benefit from department contracts, housing vouchers or municipal general assistance housing assistance funds, and prevents an applicant for general assistance from being denied general assistance for the sole reason that the person is living in a recovery residence.
- LD 1201 directs through resolve MaineHousing and stakeholders to examine fair chance housing policies considered or adopted in other jurisdictions toward the goal of state adoption to address housing issues and expand housing opportunities for formerly incarcerated individuals.
- LD 1269 requires MaineHousing to use funding in a manner to affirmatively further fair housing in the State.
- LD 1305 by resolve directs DHHS and MaineHousing to collaborate to maximize access to housing assistance for recipients of services from the department and maximize access to assistance programs administered by the department for recipients of housing assistance from the authority or its grantees.
- LD 1328 protects Maine electricity customers from winter disconnection threats.
- LD 1508 established a program to provide mediation services to parties undergoing eviction proceedings.
- LD 1530 allows municipalities to set rules less restrictive than the state's for tiny homes parameters regarding lot requirements, inspection, and property tax assessment.
- LD 1593 provide multiple pathways to rehabilitation and reentry into a community (including suitable housing arrangements) post-incarceration.
- LD 1688 addresses inconsistencies in the terminology of the Maine Human Rights Act protections for increased inclusion and protection from housing discrimination.

- LD 1697 established an allocation to distribute funding to a Homeowner Assistance Fund program.
- LD 1107 directed the Maine Connectivity Authority to act on multiple fronts to bring high-speed broadband to unserved areas of the State and to provide a funding report and federally approved plan regarding same.
- LD 1240 established a commission to examine low- and middle-income housing shortages in Maine, including short-term rental effect, local land use regulations, and the goals in existing state statute on the promotion of affordable housing, increased job opportunities, economic well-being, natural resource preservation, and to review similar efforts elsewhere, and envision measures to encourage municipalities to increase available housing.
- LD 1656 required MaineHousing-funded construction to meet energy efficient housing design standards and sustainability requirements, allowing for limited waivers.
- LD 1966 required MaineHousing to adopt HEAP rules leading to acceptance of online applications.
- LD 1673 established fair housing goal and growth management requirements in areas with certain concentrations of affordable housing, including service center and growth policies.
- LD 1871 directed the Maine Human Rights Commission to extend the pilot term of a program examining housing-status harassment and public accommodations complaints.
- LD 1891 provided grants for single-family homeowners and landlords to address contaminated well water.
- LD 2001 clarifies state policy around veterans' homes closures, including mandating DHHS rule changes regarding emergency payments allocations and appropriations.
- LD 2003 enacts recommendations made by a commission established in a prior session around proposed zoning and land use changes for the purpose of increasing housing opportunities in Maine, including requiring MaineHousing and the Department of Economic and Community Development ("DECD") to establish a statewide housing production goal that would increase the availability and affordability of housing in Maine. MaineHousing, DECD and the Governor's Office hired a consultant to provide research and analysis to help establish the goals. The consultant produced a report that analyzed the housing need in Maine and determined that the future need is between 8,500 and 9,300 homes statewide per year. The next step is to establish regional housing production goals to try and meet the future need. LD 2003 also required municipalities to modify their ordinances to: include density bonuses for affordable housing; allow 2-4 dwelling units per lot in residential areas; and allow accessory dwelling units in residential areas. This furthers the regional housing production goals and the goal to affirmatively further fair housing in Maine.

131st Legislature

- LD 3 establishes a relief payment program to aid residents with high heating costs and finalizes the COVID Pandemic relief payment program.
- LD 11 strengthens temporary protections for children living in dwellings with identified lead hazards, including expanding inspection and relocation parameters.
- LD 45 strengthens the existing protections against retaliatory eviction.
- LD 81 addresses the intersection of general assistance and recover residence participation.
- LD 330 requires that tenants facing eviction be made more aware, and more frequently, of their rights to legal representation.
- LD 470 supports lead abatement in older residential housing through one time funding.
- LD 490 designates Maine DHHS as the lead agency for lead safe housing registry

- LD 523 resolve provided for legislative review of the administrative rules dealing with Home Based Supports and Services for Older and Disabled Adults and Consumer Directed Personal Assistance.
- LD 597 required discharge and transfer policy protocols at certified recovery residences.
- LD 611 resolve mandating MaineHousing to begin work toward a financial assistance program for low-income homeowners to make weatherization and repair improvements needed for HEAP eligibility.
- LD 651 amended definition regarding certain mobile homes for HUD standard compliance.
- LD 654 resolve directing Governor's office to act to encourage the development of accessory dwelling units.
- LD 691 prohibits rental application fees and requires landlords to provide applicants with a complete copy of any eligibility screening.
- LD 701 extends the written notice timeline for certain rent increases.
- LD 709 mandates MaineHousing, in partnership with appropriate agencies if desired, to develop a Home Share Pilot Program to match older persons with spare rooms to be rented for the purpose of reducing living costs with renters in need of housing.
- LD 724 increases the opportunity for the development of targeted low-income housing for populations with additional needs, including disability, substance use, HIV, homelessness, domestic violence, foster care recipients, and wards of the state, incorporating an income cap under certain circumstances.
- LD 815 directs MaineHousing and the Efficiency Maine Trust to provide energy-efficiency education and outreach to low- and moderate-income residents of manufactured housing, and to ensure access to energy-efficiency loans for eligible residents.
- LD 1481 protects families with children from being evicted from homes ordered cleared of lead.
- LD 1633 is a still-pending bill to establish a community-based, peer-supported reentry program for incarcerated individuals leading up to release, incorporating support for housing and other critical needs.
- LD 1706 clarifies statewide laws regarding affordable housing and accessory dwelling, including with regard to permitting, setback and approval timing.
- LD 1844 establishes an Emergency Housing Matching Grant Program to fund matching grants for emergency housing and shelter programs.
- LD 1931 requires mobile home park owners to provide notice of intent to sell to park tenants and to MaineHousing, as well as requiring a 60-day negotiation period to allow the tenants to offer purchase terms and secure financing.

Assessment of Fair Housing Data

FAIR HOUSING COMPLAINTS

2023 Fair Housing Complaint Data					
City	Number of Cases	Total Allegations	Disability Allegations	Race/Color Allegations	Sex/Gender ID/ Sexual Orient. Allegations
Auburn	4	21	4	4	3
Bangor	2	2	2		
Bar Harbor	4	8	4		4
Belfast	1	2	1		
Biddeford	7	16	7		3
Brewer	2	2	2		
Bridgewater	1	3	1		
Brunswick	6	12		6	
Columbia Falls	3	6	3		
East Orland	1	2	1		1
Lewiston	3	7	3		
Lincoln	4	5	4		1
Lisbon	3	6	3	1	
Manchester	2	2	2		
Old Orchard Beach	2	2	2		
Orono	1	3			1
Peru	1	1			
Portland	13	20	7	3	
Rumford	1	1			
South Paris	4	12	4		4
South Portland	2	2	2		
Unity	1	1			
Waterville	3	6	3		
Winthrop	3	5	3		
Total	74	146	58	14	17

Table 1 - Maine Human Rights Commission: 2023 Fair Housing Complaints by City. Total cases and allegations, with totals for most salient types of allegations. Each case may include several allegations.

Data Source: MHRC, CY 2023.

Basis of Allegations	2019	2020	2021	2022	2023	Average
Total Allegations	22	59	153	104	146	96.8
Race or Color	13.6%	16.9%	7.2%	10.6%	9.6%	11.6%
National Origin/Ancestry	13.6%	6.8%	3.3%	3.8%	0.7%	5.6%
Sex/Sexual Orientation/Gender Identity	13.6%	5.1%	10.5%	13.5%	11.6%	10.9%
Disability	36.4%	30.5%	29.4%	32.7%	39.7%	33.7%
Religion	0.0%	1.7%	0.0%	1.0%	2.1%	1.0%
Familial Status	13.6%	11.9%	5.2%	9.6%	6.8%	9.4%
Retaliation	9.1%	23.7%	36.6%	16.3%	21.9%	21.5%
Other & Source of Income	0.0%	3.4%	7.8%	12.5%	7.5%	6.2%

Table 2 - Maine Human Rights Commission: Basis of allegations by share of total, 2019 to 2023.
Data Source: MHRC, CY 2019-2023.

Basis

Disability is the most common basis for an allegation of a fair housing violation. In 2023, 58 allegations (39.7% of the total) were based on disability, which are often related to support animal accommodations or accessibility violations. Disability has consistently remained the most frequently reported allegation in past years.

Most allegations regarding race or color originate in population centers (Portland, Auburn, and Brunswick) whereas allegations regarding sex, gender identity, or sexual orientation are more likely to originate in smaller towns. While the former is likely due to the geographic variation in BIPOC population concentrations, the latter is more likely due to geographic variation in cultural acceptance of evolving gender norms and sexual identities.

Another feature of the basis of complaint data is that retaliation is an increasingly frequent allegation. This suggests that registering a complaint of fair housing discrimination is, allegedly, met with further illegal behavior by the accused on a more frequent basis. This may be a landlord evicting the complainant, a real estate agent telling others not to show homes to the complainant, or other retaliatory actions.

Disposition of MHRC Housing Discrimination Cases	2019 - 2023	
	# of Cases	Percent
CP failed to respond	1	0.2%
CP uncooperative	14	2.7%
No jurisdiction	9	1.8%
Failure to state a claim	7	1.4%
Other AD	6	1.2%
Right to sue issued at CP's request	1	0.2%
Withdrawal without benefits	37	7.2%
Negotiated settlement	27	5.3%
Withdrawal with benefits	42	8.2%
No cause finding	327	63.7%
Conciliation successful	26	5.1%
Conciliation unsuccessful	12	2.3%
Case settled by legal unit	4	0.8%

Table 3 - Maine Human Rights Commission: Disposition of housing discrimination cases closed.
Data Source: MHRC, FY 2019-2023.

This may explain the need for legislation, such as LD 45, meant to reinforce a tenant’s right to file a complaint with the Maine Human Rights Commission.

Disposition

The majority of allegations reviewed by the Maine Human Rights Commission during the previous five years were disposed of with no finding of cause. Although cases so resolved do not substantiate the complainant’s allegation, it is likely that the resolution in some portion of those cases is the result of the complainant’s failure to document the alleged behavior rather than the veracity of the underlying claim. Regardless, whether or not the Commission issues a finding of cause, each case is an instance in which a tenant believes their rights to have been violated. Therefore, all cases filed are informative with respect to the fair housing environment in Maine.

Approximately 19% of cases are settled via successful conciliation, withdrawal with benefits, or a negotiated settlement, while about 10% are withdrawn without any benefits or conciliation is unsuccessful. It is extremely rare for the Commission to affirm the complainant’s right to sue, which is required for complainant (plaintiff) legal fees to be eligible for compensation.

Mortgage Activities

All other racial and ethnic groups have less favorable rates of application denial than white, non-Hispanic households in Maine. This is most true for Native Hawaiian or other Pacific Islander, Native American, and Hispanic households, who together were denied for about one quarter of all applications received in 2022. With the exclusion of Hispanic households, the rate applications not resulting in a loan origination is significantly elevated for all non-white racial groups. We do not have clear information on the reasons for these non-originations.

	White	Asian	Black or African American	Native Hawaiian or other Pacific Islander	Native American	Hispanic
Total Applications	50,767	640	781	49	290	603
Loan Originated	64.6%	60.2%	57.9%	44.9%	46.2%	73.6%
Application Denied	14.6%	15.3%	17.8%	26.5%	22.4%	26.4%
Loan Not Originated	20.8%	24.5%	24.3%	28.6%	31.4%	0.0%

Table 4 - Mortgage Applications by Race and Ethnicity. Each application results in a loan origination, application denial, or no loan origination for a number of other potential reasons.

Data Source: HMDA, all applications calendar year 2022.

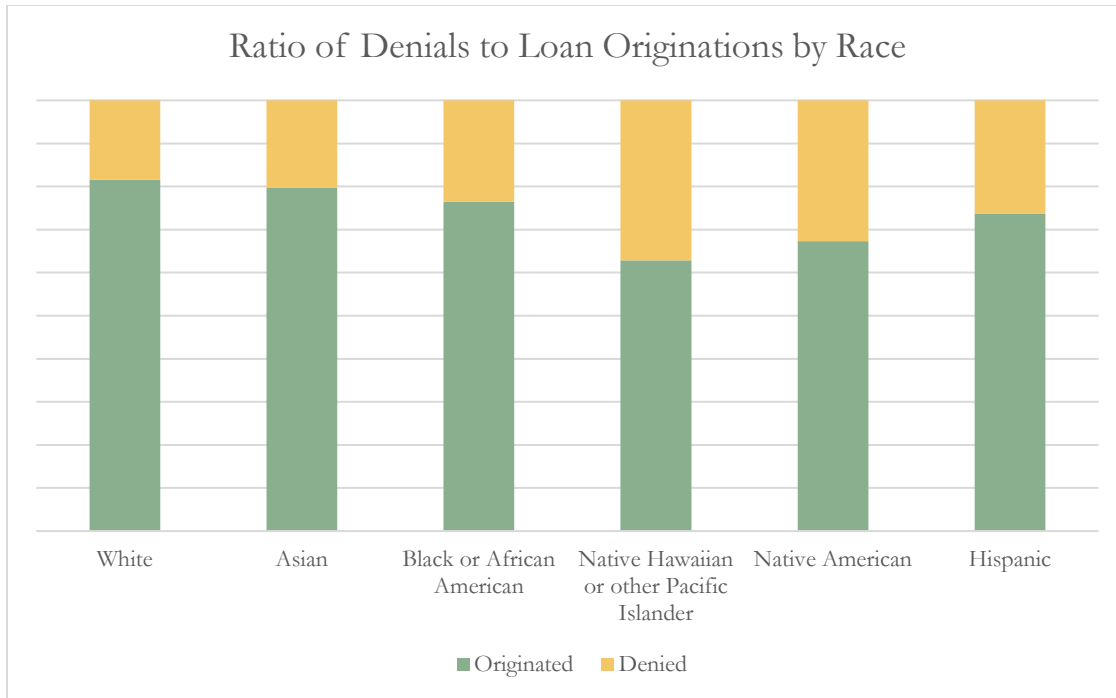


Figure 1 - Mortgage Applications by Race and Ethnicity. Only originated loans and denied applications are depicted here.
Data Source: HMDA, all applications calendar year 2022.

The ratio of application denials to loans originated, by racial or ethnic group, highlights the widest disparities existing between white non-Hispanic applicants and those of Native or Pacific Islander descent. However, it is clear in Table 5 and Figure 2 that the reasons for mortgage denials vary widely among these marginalized groups. For Black or African American and Hispanic applicants, the reasons for denial are surprisingly similar to those of white applicants, mainly deviating because of higher rates of denial due to insufficient cash for closing among Black or African American and higher rates of denial due to employment history for Hispanic applicants. Meanwhile Native American applicant denials are most often due to credit history, at a much higher rate than for any other group, and Native Hawaiian, Pacific Islander, and Asian applicants are most frequently denied because of unfavorable debt to income ratios.

Taken together, these data support the observation that there are racial disparities in terms of access to homeownership, but the data are most supportive of those disparities being due to systemic issues of bias and discrimination rather than direct discrimination by the loan originators. This is because the different reasons for loan denials by racial group are difficult to explain as direct discrimination unless there are distinct subgroups of lenders that are discriminating against each marginalized group. More likely, differences in the information and resources available to the respective applicant pools, due to systemic and historical biases, interact with possibly unconscious and much more subtle expressions of bias, if any, among those originating loans to result in the observable disparity. Consequently, in addition to ongoing compliance and monitoring of loan origination, the evidence supports programming targeting the gaps in information and resources that result in systemic and institutional forms of discrimination. MaineHousing’s First Generation Homebuyer Program is one example of an existing program with that effect, offering additional resources for loan closing and financial literacy courses to ensure the new homeowner has the tools to succeed, from application to managing their new home and mortgage responsibilities.

	White	Asian	Black or African American	Native Hawaiian or other Pacific Islander	Native American	Hispanic
Debt to Income ratio	31.9%	52.3%	35.5%	53.8%	18.0%	32.7%
Employment history	1.4%	3.4%	0.0%	0.0%	1.6%	2.6%
Credit history	26.2%	15.9%	24.6%	7.7%	41.0%	29.5%
Collateral	17.1%	10.2%	16.7%	15.4%	16.4%	11.5%
Insufficient cash for closing costs	1.8%	2.3%	4.3%	0.0%	1.6%	1.3%
Unverifiable information	3.6%	3.4%	2.9%	0.0%	3.3%	2.6%
Credit application incomplete	9.6%	5.7%	6.5%	7.7%	8.2%	9.6%
Mortgage insurance denied	0.1%	0.0%	0.7%	0.0%	0.0%	0.0%
Other	8.2%	6.8%	8.7%	15.4%	9.8%	10.3%

Table 5 - Reason for Mortgage Application Denials.
 Data Source: HMDA, all applications calendar year 2022.

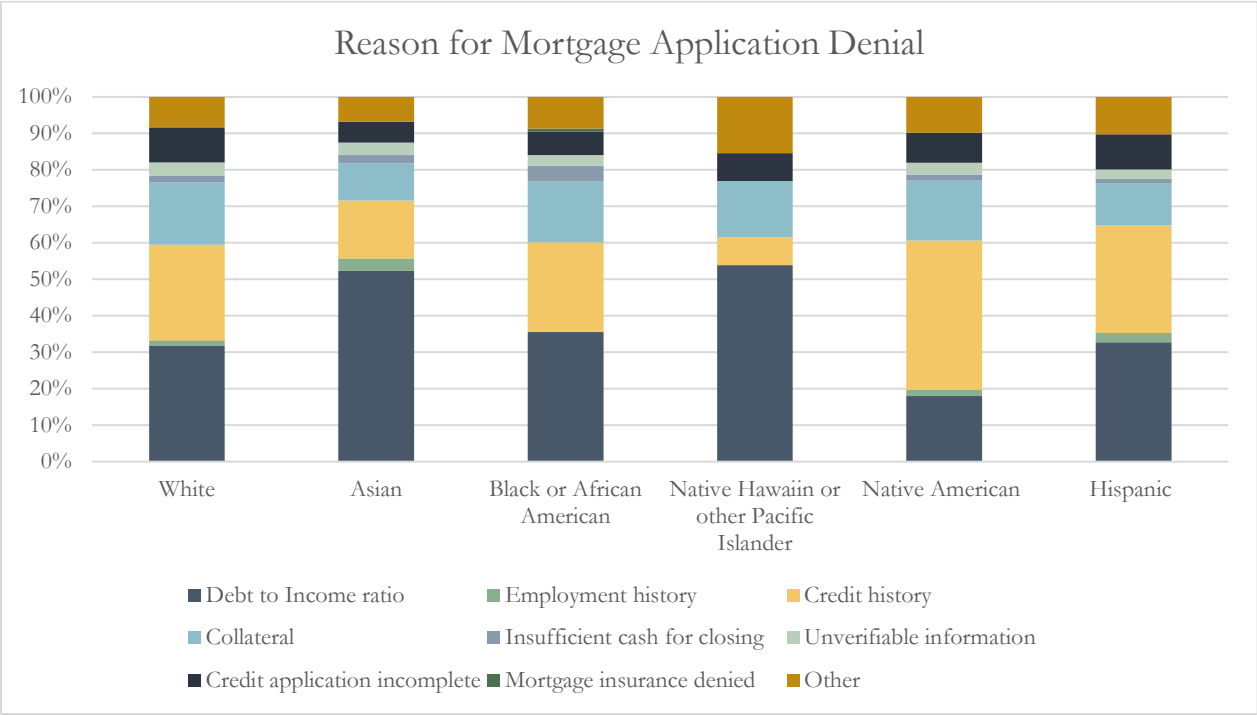


Figure 2 - Reason for Mortgage Application Denials.
 Data Source: HMDA, all applications calendar year 2022.

DEMOGRAPHICS, INCOME, AND THE RESIDENTIAL HOUSING MARKET

Population Trends

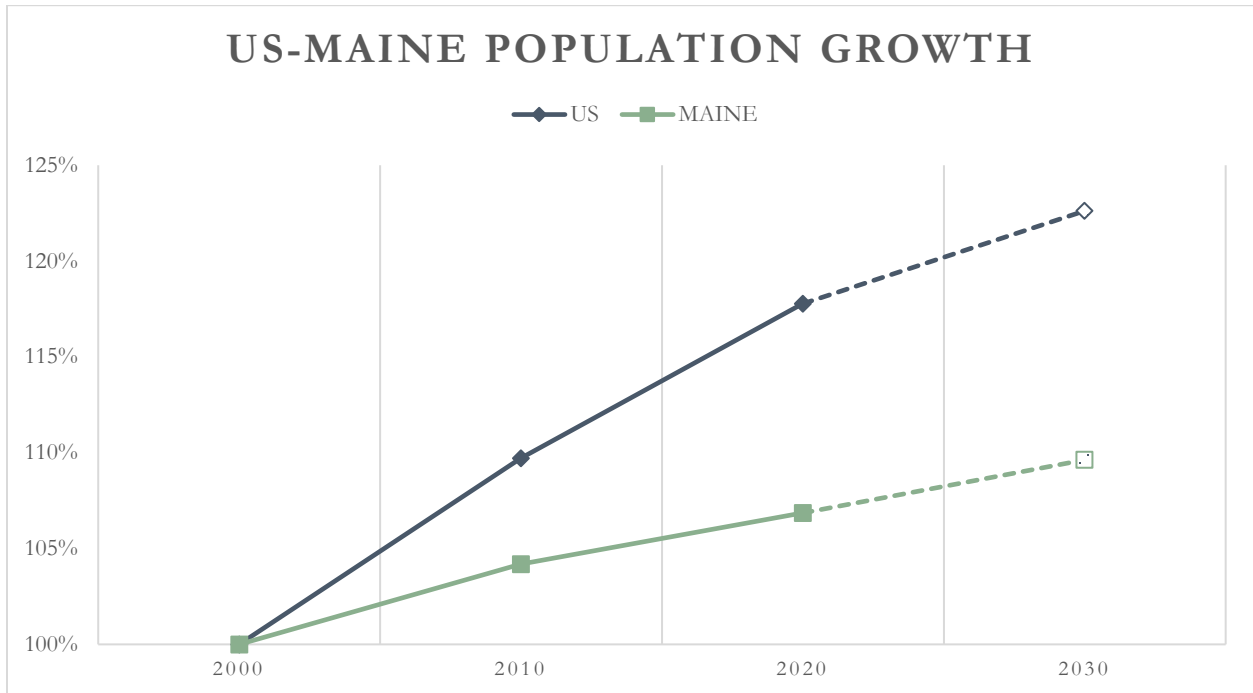


Figure 3 - Population growth since 2000, historic and projected.

Data Source: IPUMS 2022 ACS 5-year sample and Office of the Maine State Economist.

In 2018 Maine’s population was estimated to have effectively stopped growing, projecting a total growth of only 1% from that date through 2030. However, the statewide population has continued to grow at roughly the same 2% to 3% per decade rate that it had for the preceding decade. Figure 5 suggests that this growth is not due to birth rates but to domestic and international in-migration. The population of Mainers above the age of 60 is growing rapidly as the “Baby Boom” generation reaches older ages. The younger generation of Mainers is much smaller, hence the decrease in Mainers aged 45 to 60, but that shrinkage appears to be offset among younger households as young adults migrate to Maine to find new careers and start families.

The geographic dispersion of population growth tells an interesting story as well. Since 1990, Maine’s population has been shifting to the southern regions of the state. Aroostook, Piscataquis, and Washington county populations all shrunk significantly, while Cumberland, Hancock, Waldo, and York counties all saw explosive growth. Yet in the most recent years that southerly trend is not apparent at all. The heat maps in Figure 4 show growth in more rural areas of central and western Maine. Of course, pandemic response may drive some of this change and the remainder of the decade will establish whether this may represent newly settled immigrant farming communities, new industry in small towns, or short-lived pandemic responses to remote work opportunities.

Population Trends					
	1990	2000	2010	2020	Percent Change
Maine	1,227,928	1,274,923	1,328,361	1,362,359	10.9%
Androscoggin	105,259	103,793	107,702	111,139	5.6%
Aroostook	86,936	73,938	71,870	67,105	-22.8%
Cumberland	243,135	265,612	281,674	303,069	24.7%
Franklin	29,008	29,467	30,768	29,456	1.5%
Hancock	46,948	51,791	54,418	55,478	18.2%
Kennebec	115,904	117,114	122,151	123,642	6.7%
Knox	36,310	39,618	39,736	40,607	11.8%
Lincoln	30,357	33,616	34,457	35,237	16.1%
Oxford	52,602	54,755	57,833	57,777	9.8%
Penobscot	146,601	144,919	153,923	152,199	3.8%
Piscataquis	18,653	17,235	17,535	16,800	-9.9%
Sagadahoc	33,535	35,214	35,293	36,699	9.4%
Somerset	49,767	50,888	52,228	50,477	1.4%
Waldo	33,018	36,280	38,786	39,607	20.0%
Washington	35,308	33,941	32,856	31,095	-11.9%
York	164,587	186,742	197,131	211,972	28.8%

Table 6 - County populations over time.
Data Source: NHGIS data.

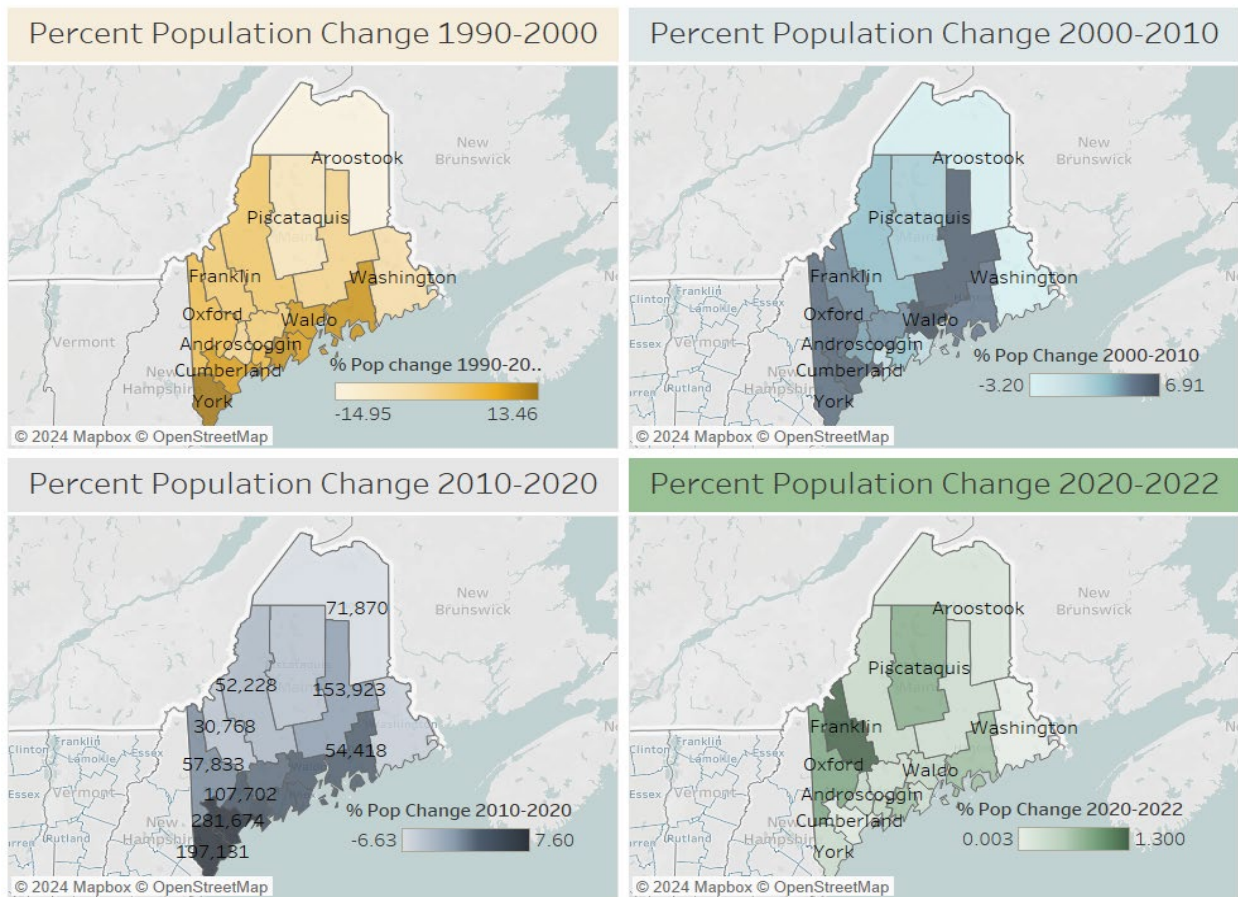


Figure 4 - Population change heat maps. Decadal percent change by county from 1990 to 2020, with the final panel showing only the available years of 2020 to 2022.
Data Source: NHGIS data.

Age

Maine’s median age of 44.8 is the oldest of any state in the nation. However, the median has only increased by half a year over the past five years, which may indicate that the age profile is evolving in a slightly more balanced manner than some of the more dire predictions have suggested.

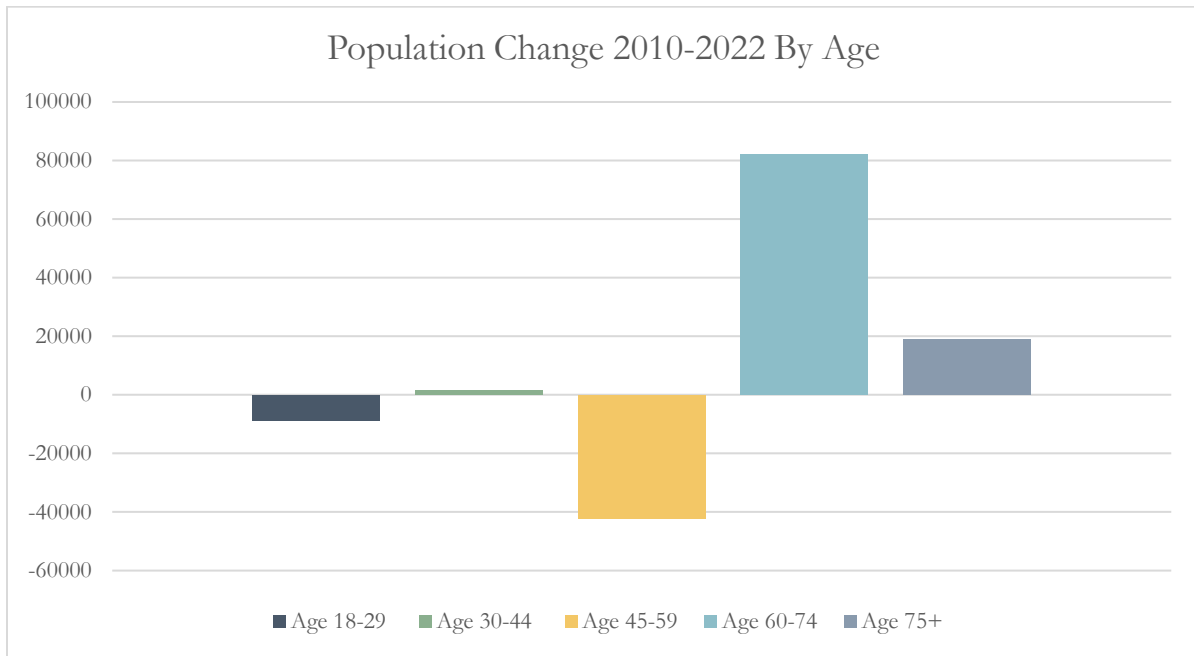


Figure 5 - Maine population change by age cohort, 2010 to 2022.

Data Source: IPUMS 2022 ACS 5-year sample; 2010 Population Census.

Considering population shifts in Figure 5 and similar projections for the remainder of this decade, from the Office of the Maine State Economist, there is no denying that Maine’s population over the age of 60 is growing as a proportion of the whole. This has implications far beyond labor and healthcare markets, and most especially with respect to housing. Those older Mainers may find themselves in need of home modifications to live comfortably or struggling to rising rents, property taxes, or maintenance costs on fixed incomes. Or in cases of growing infirmities, they may need to find new accommodations with access to the healthcare or services they require.

Race

Maine has never been, comparatively speaking, a racially diverse state. However, the previous decade has brought explosive growth among some racial minority populations. From 2012 to 2022, the Black or African American population grew by more than 50% and those reporting as multiracial or some other race both grew by well over 100%. Maine’s population declined from 94.6% to 93.7% white. Like its northern New England sister states of Vermont and New Hampshire, Maine’s black population (1.3%) and Asians (1.1%) are much fewer in numbers than the national distribution of 13% and 5% respectively.

Race	2000	2012	2017	2022	Percent Change 2012 to 2022
White alone	1,236,014	1,266,435	1,258,918	1,261,284	-0.4%
Black or African American	6,760	14,338	16,906	21,775	51.9%
Native American	7,098	7,168	8,212	6,722	-6.2%
Asian	9,111	13,971	14,804	15,071	7.9%
Native Hawaiian and Other Pacific Islander	382	288	249	265	-8.0%
Some Other Race	2,911	3,356	2,967	8,128	142.2%
Two or More Races	12,647	23,528	28,102	53,704	128.3%

Table 7 - Maine population by racial group, over time. Decadal percent change is from 2012 to 2022.
 Data Source: Census data and ACS 5-year estimates.

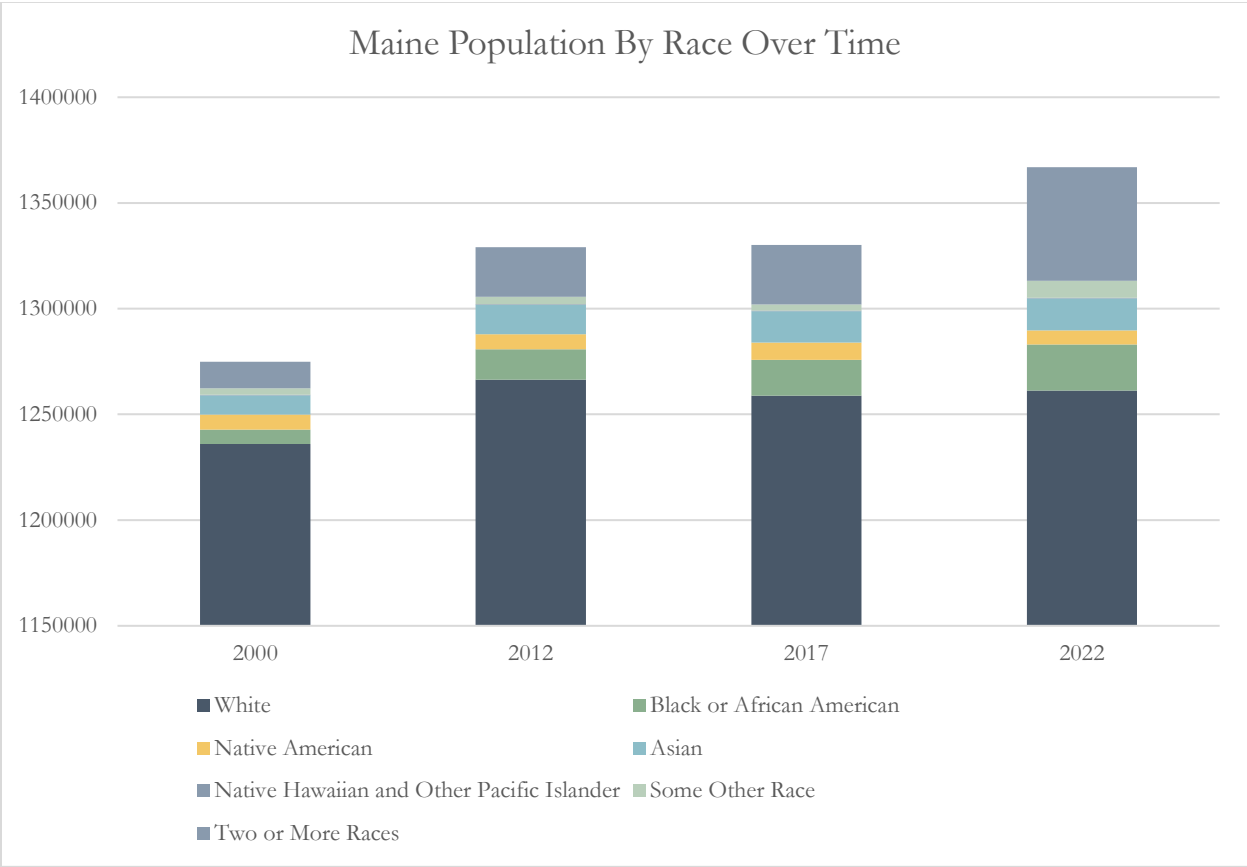


Figure 6 - Racial distribution of Maine population over time.
 Data Source: Census data and ACS 5-year estimates.

Maine has no Racially or Ethnically Concentrated Areas of Poverty (R/ECAPs) using HUD’s definition of R/ECAP, with the exception of the Penobscot Indian Island Reservation. Although several racial minority populations have increased, there are no areas where those populations are so concentrated as to meet the R/ECAP criteria. Instead, we review the interact of race and poverty more generally.

Race/Ethnicity and Income

On average, BIPOC households in Maine earn far less than white, non-Hispanic households with two exceptions. Asian households have a slightly lower median income but also have a slightly lower poverty rate, and in either case the differences are within the margin of error so they could be said to have the same earnings, on average. The Native Hawaiian and Pacific Islander population is extremely small, just 265 individuals, but with contrasting income metrics. As a group, they have a remarkably high median income, exceeding the state average by nearly 50%, and yet they also have a poverty rate that exceeds the state average.

Black, African American, and Native American households have the greatest income disparities relative to white households. The white households’ median income is about 30% greater than Black or African American households and for Native American households. The poverty rate among Black or African American households is more than double that of white households or the state average.

	Median Income	Poverty Rate
Maine	\$ 68,251	10.9%
White	\$ 68,783	10.5%
Black or African American	\$ 53,407	24.2%
Native American	\$ 51,797	19.7%
Asian	\$ 66,291	10.7%
Native Hawaiian and other Pacific Islander	\$ 104,310	12.5%
Some other race	\$ 63,554	12.4%
Two or more races	\$ 60,214	14.7%
Hispanic or Latino origin (of any race)	\$ 65,650	13.4%
White alone, not Hispanic or Latino	\$ 68,812	10.5%

Table 8 - Median incomes and poverty rates by race and ethnicity.
Data Source: 2022 ACS 5-year sample.

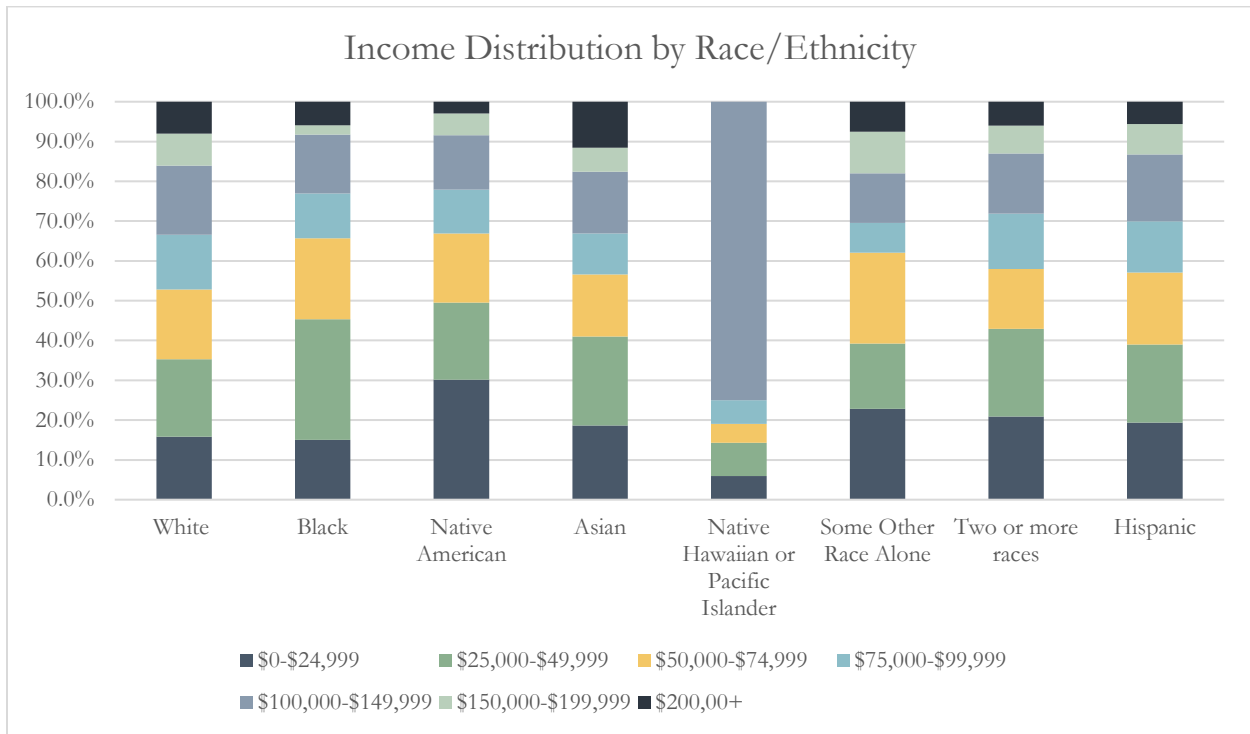


Figure 7 - Income distributions for each racial or ethnic group.
Data Source: 2022 ACS 5-year sample.

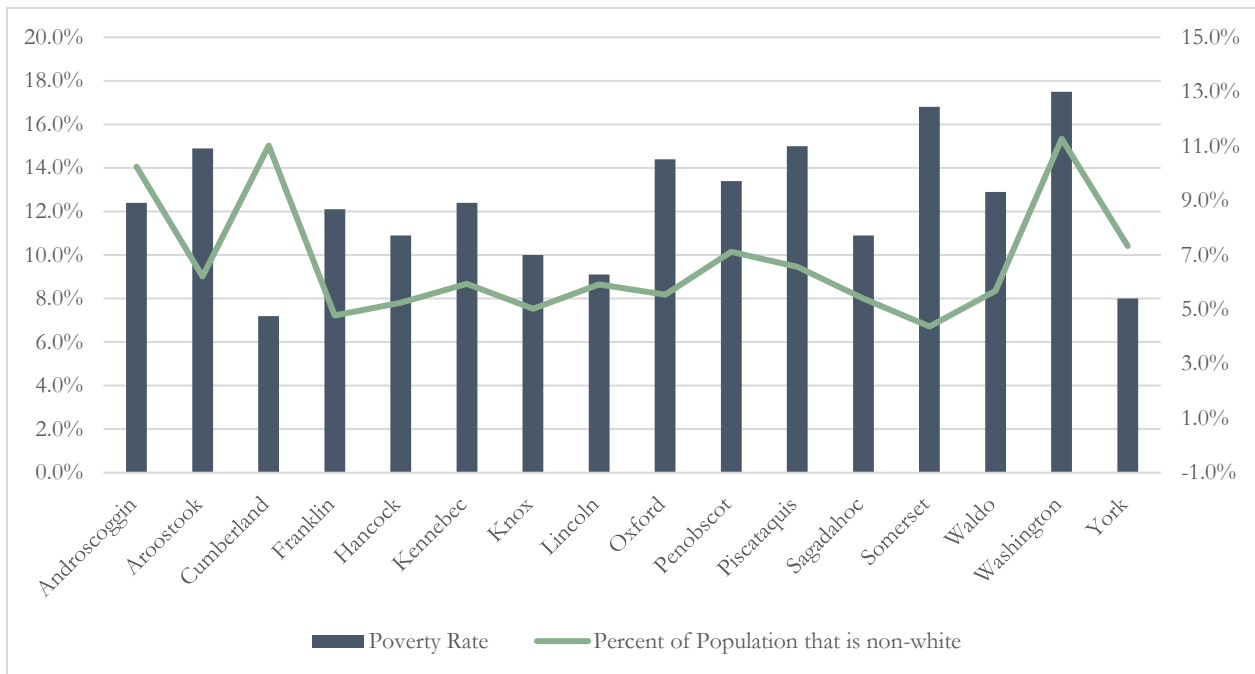


Figure 8 - County-level poverty rate and minority population comparison. Bars depict the poverty rate (left axis) and line depicts the share of county population that is non-white (right axis).
Data Source: 2022 ACS 5-year sample.

Figure 7 clearly illustrates the source of the high median for Native Hawaiian and Pacific Islander incomes, with about three out of four households earning between \$100,000 and \$150,000. Less obvious is what it reveals about incomes and poverty rates between Black or African American households versus Native American households. Table 8 shows the former have a poverty rate of 24.2% while the latter it is 19.7%, but Figure 7 shows 15% of Black households and 30% of Native American households earning less than \$25,000. The key is that poverty rates are based on household size, so it must be the case that low-income Black households are, on average, larger than low-income Native American households.

The relationship between race, poverty, and geography is interesting in Maine. Since there are higher rates of poverty among non-white populations in Maine, it is straightforward to extrapolate that regions with a larger share of non-white population will have higher poverty rates. Figure 8 shows that the non-white population share and poverty rate metrics do trend together but the relationship is not all that strong and there to two clear outliers that buck the trend. Cumberland county has a relative large non-white population and low poverty rates, while Aroostook County shows the exact opposite.

Race and Tenure

Maine’s white population has the highest homeownership rate at 74%, well above the national average of 65%. Homeownership is often seen as a measure of wealth and the capacity to build wealth, and generally as more conducive to building familial assets. With the exception of Native Hawaiian and Pacific Islanders, homeownership rates among all racial minority groups in Maine lag behind that of white households. However, they are improving. Black homeownership, although still the lowest, increased from 19% five years ago to 26% in these data.

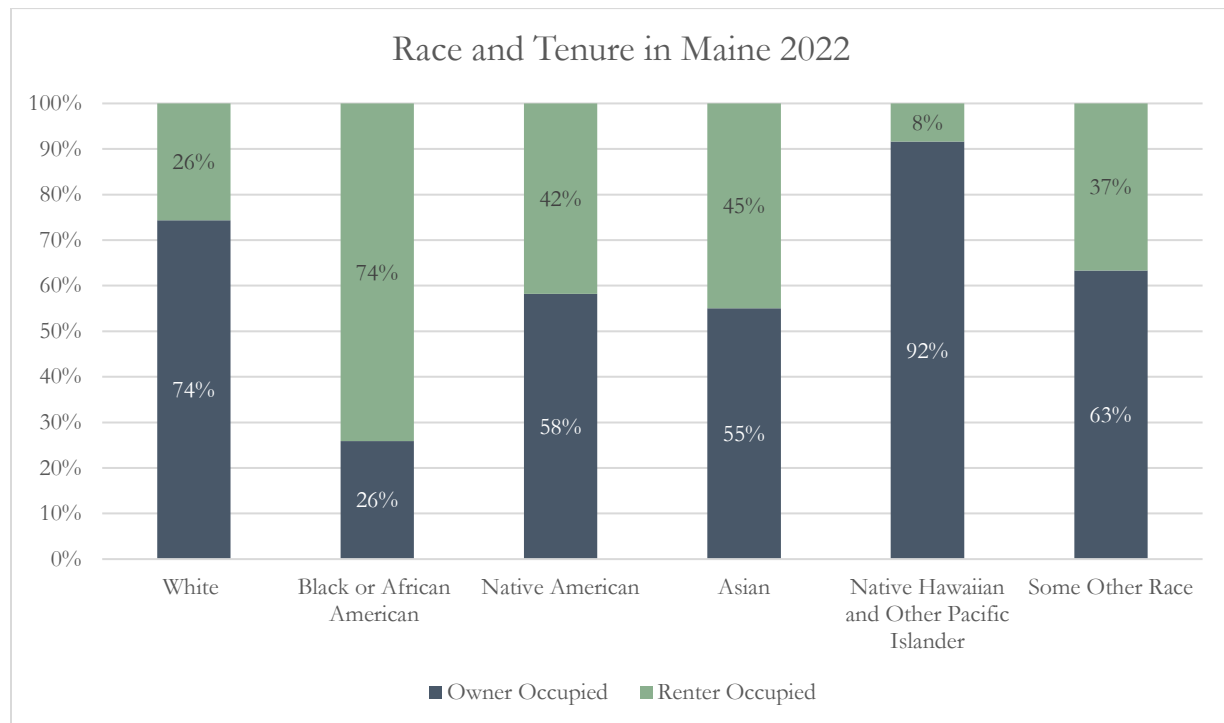


Figure 9 - Housing tenure by racial group.
Data Source: 2022 ACS 5-year sample.

Language

Although still small, a growing portion of Maine residents have Limited English Proficiency (LEP). Maine residents with LEP have difficulty reading, writing, and speaking English, as well as understanding others who speak it. LEP can seriously impact an individual's chances to access safe affordable housing.

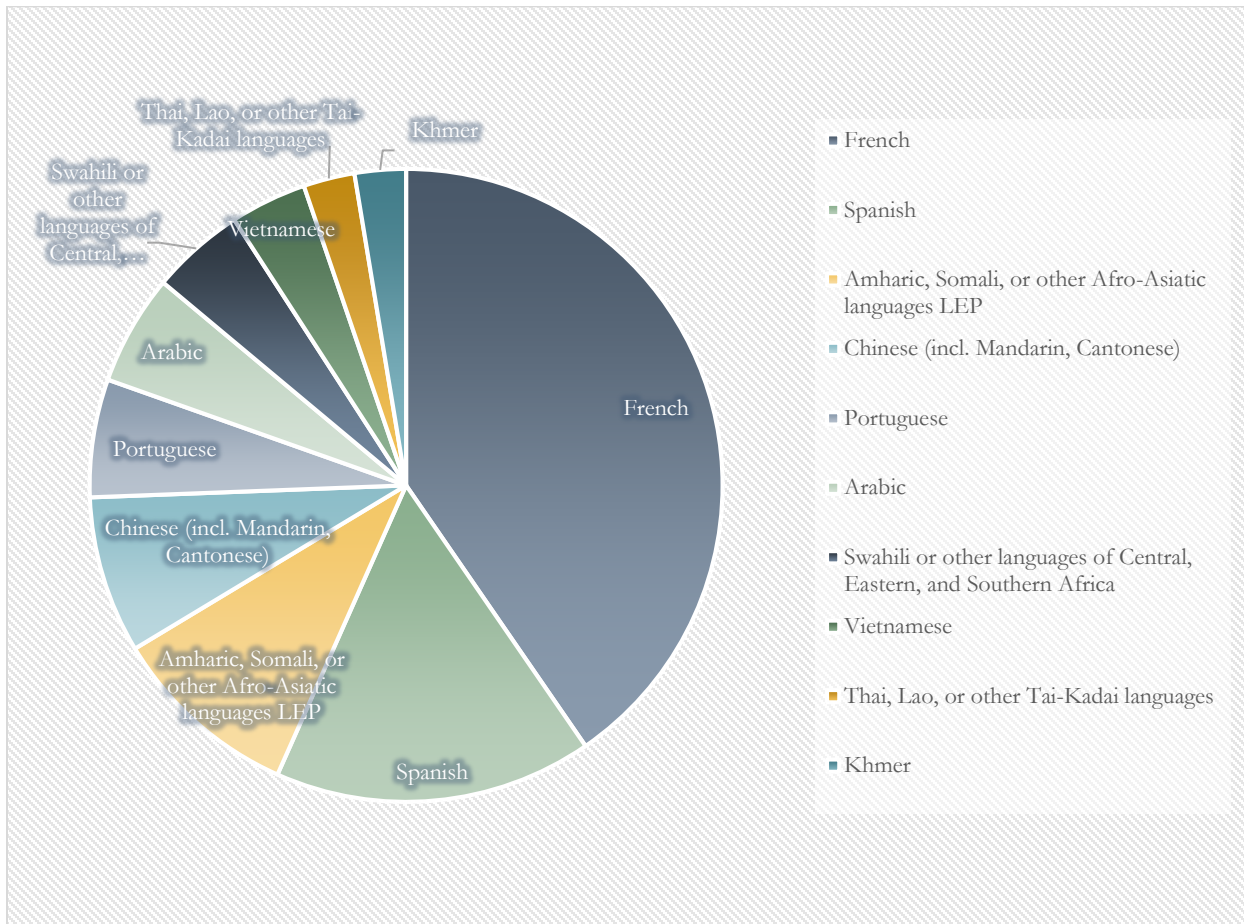


Figure 10 - Top 10 languages of groups with limited English proficiency in Maine.

Data Source: LEP.gov.

Disabilities

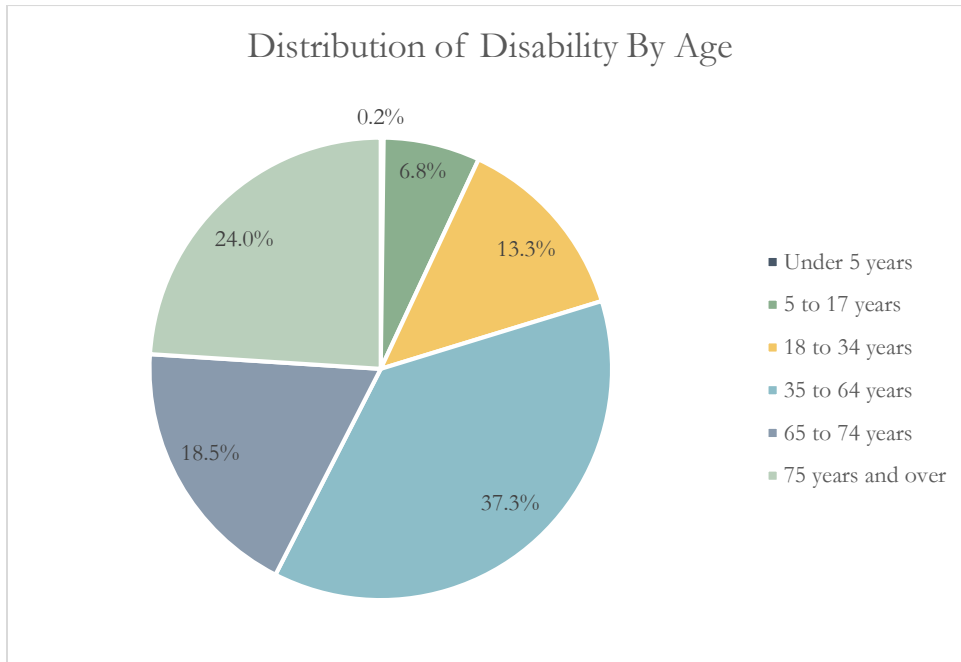


Figure 11 - Distribution of disability in Maine by age groups.

Data Source: 2022 ACS 5-year sample.

In the state of Maine, 15.8% of the population, 217,651 individuals, report having one or more disabilities. 42% of Maine’s disabled residents are over 65, while just over 50% are 18 to 64 years old. Among the latter, cognitive and ambulatory disabilities are the most common. These make it challenging for those individuals to participate in the workforce and can require simple to very

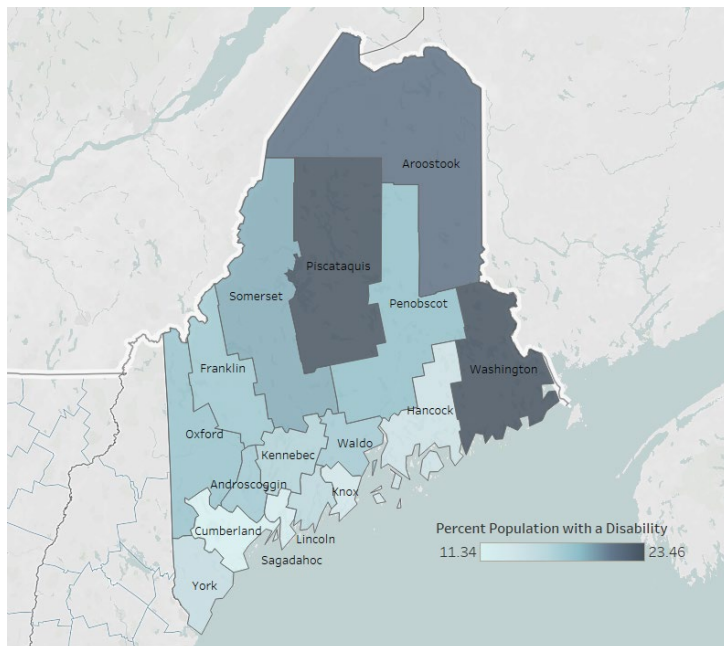


Figure 12 - Heat map of county share of population with a disability.

Data Source: 2022 ACS 5-year sample.

complex accommodations for a safe housing environment. Additionally, Figure 12 shows that a disproportionate share of Mainers with disabilities live in more rural areas of the state where public services and community assets are harder to find. These areas also have fewer new developments, which are the most likely housing to be accessible or adaptable. Finally, a aging population will continue to expand the share with disabilities and, consequently, the demand for accessible housing and services.

Identified Impediments to Fair Housing Choice

Based on research and community conversation, we identify the following impediments to fair housing choice. Actions to address these impediments are outlined in the following action plan.

1. Lack of affordable housing

- The 2023 State of Maine Housing Production Needs Study estimated that Maine had a historic deficit of 37,000 housing units and would need to increase supply by a total of more than 80,000 units by 2030. A limited supply of housing leads to increased competition for existing units, which has the effect of exacerbating all existing impediments to fair housing access.
- Recent Census data estimates have one in ten Maine households spending more than 50% of their income on housing costs. This housing cost burden is concentrated amongst racial and ethnic minorities, as well as other marginalized groups.
- Housing Choice Voucher waiting lists in Maine at the local PHAs and MaineHousing are excessively long, meaning only applicants eligible for a special purpose voucher allocation can expect a voucher within one year. Additionally, MaineHousing and most PHAs have seen steadily increasing per unit costs and have been forced to pause issuance of new vouchers because they have exceeded their HUD allocation.
- Down payment and closing cost assistance is needed for most new homebuyers.
- Any failure to preserve the existing supply of affordable housing units and aging public housing developments will diminish supply. Somewhere between 15% and 30% of all current affordable housing units in Maine were built more than 45 years ago. Although many of those have extended their affordability covenants, many still require serious renovation or may require replacement.

2. Barriers for protected classes

- Each of Maine's racial and ethnic minorities have a lower median income¹ and higher poverty rates than those of the white, non-Hispanic majority.
- Almost all of the population growth in Maine over the past decade has been among Black, African American, multiracial, and refugee/asylum-seeking populations.
- Maine also has a growing population of openly LGBTQ+ residents and the third most common basis for fair housing allegations at the Maine Human Rights Commission in 2023 was sex, sexual preference, or gender identity. A 2019 survey by the DOE found that, county to county, 13.5% to 18% of high school students identified as lesbian, gay, bisexual, or unsure, while 2.3% to 4.5% identified as transgender or unsure.
- Age is a protected class in Maine and ageism can be an issue in housing as well as employment.

¹ Native Hawaiian and Pacific Islanders (making up a total of 265 Mainers) are an exception, with a high median income due to a large proportion of high income earners but also a higher poverty rate than the statewide average.

- 3. Lack of availability and access to housing for persons with disabilities.**
 - The proportion of Maine’s disabled population is 30% higher than the national rate and higher than that of all the other New England states.
 - The lack of accessible units was raised in public comments and the Fair Housing surveys, and the need for accessible housing is only expected to increase as a result of Maine’s aging population.
 - The most common basis for fair housing complaints filed with the Maine Human Rights Commission are allegations of disability discrimination.

- 4. Community Planning and Zoning decisions that impede affordable housing**
 - Local zoning ordinances relating to lot size, density, and parking set asides often have the effect of limiting growth of the housing stock and thereby excluding new residents from high opportunity areas.
 - Ordinances meant to limit density in a given area can have the effect of limiting housing development designed to accommodate people with special needs due to disabilities.
 - Understanding of building codes and Fair Housing laws/requirements vary by municipality.

- 5. Limited access to neighborhood opportunities and community assets**
 - Shifting economic conditions mean that many households, in addition to struggling with affordability, simply can’t access housing in proximity to the jobs, education, healthcare, or other community assets or opportunities that are needed.
 - Limited access to neighborhood opportunities and community assets particularly impact low-income households located in rural Maine
 - LIHTC projects are not feasible in areas facing diminished transportation options, essential services, or jobs.
 - Often the areas with job opportunities and available services, like public transportation, are the areas in which it is hardest to find available housing units that will accept Housing Choice Vouchers.
 - Maine has one of the oldest populations in the country and many of those older adults live in rural communities without the community assets they will need to age comfortably.

- 6. Lack of understanding of fair housing and availability of programs that affirmatively further fair housing**
 - Differing federal and state accessibility requirements are complex, causing confusion among developers and design professionals, and often leading to noncompliance.
 - Due to a lack of understanding, fair housing laws are not always followed. The majority of housing discrimination complaints are based on disabilities.
 - Public education efforts are inadequate and may not reach all intended audiences.

**MaineHousing
Analysis of Impediments to Fair Housing
Action Plan**

MaineHousing submits the following action plan to address impediments identified in its Analysis of Impediments to Fair Housing.

Impediment 1: Lack of Affordable Housing			
Action	Measurable Objective	Timeline	Responsible Department
1.1 Increase the number of affordable multifamily and single-family housing units	The number of affordable multifamily and single-family housing units created	Annually	DEV/HO
Results:			
1.2a: Preservation of rental housing units	The number of housing units preserved The number of projects in which the affordability was increased or extended	Annually	DEV/AM
1.2b: Preservation of single-family housing	The number of housing units preserved	Annually	EHS
Results:			
1.3a: Increase the funding available to develop affordable housing	Changes (increase/decrease) in funding available for programs	Annually	Directors
1.3b: Increase the flexibility and efficiency of the funding available to develop affordable housing	Changes to restrictions placed on funding	Annually	Directors
Results:			
1.4: Data collection and analysis of affordable housing availability and needs in Maine.		Annually	PnR

Impediment 1: Lack of Affordable Housing			
Action	Measurable Objective	Timeline	Responsible Department
Facilitate access to and awareness of available data to assist communities in conducting affordable housing assessments and external partners conducting affordable housing-related research.	The number of communities and external partners accessing the data		
Maintain and enhance availability of MaineHousing data for community utilization.	Increase the availability and quality of the data		
Results:			
1.5: Programs achieve deeper affordability than the statutory minimum affordability required for LIHTC and tax-exempt bond projects	<p>The number of affordable units that exceed the minimum required</p> <p>The number of units with income targeting below minimum required</p> <p>The number of units that are affordable longer than minimum affordability period</p>	Annually	DEV
Results:			
1.6: Increase homebuyer affordability	Change in yearly differential in MaineHousing interest rate compared to market rate by program	Annually	HO
Maintain or increase the difference between MaineHousing's lower interest rate relative to the average bank rate for low- and moderate-income homebuyers.			
Provide down payment assistance to qualified homebuyers.			

Impediment 1: Lack of Affordable Housing			
Action	Measurable Objective	Timeline	Responsible Department
Create or modify programs to reduce socioeconomic and minority gaps in homeownership.	The number of buyers receiving down payment assistance Increases in minority homeownership		
Results:			

Impediment 2. Barriers for Protected Classes			
Action	Measurable Objective	Timeline	Responsible Department
Results:			
2.1: Coordinate with advisory groups, boards, and commissions to address barriers for protected classes in MaineHousing programs	List of groups involved and changes to MaineHousing programs as a result	Annually	HO/PnR/ Fair Housing Team/ Director's Team
Results:			
2.2: Fund English as a Second Language financial literacy group education, homebuyer education classes and one-on-one services for individuals who are not proficient in the English language	The number of individuals who participated The type of services provided List of languages served	Annually	HO
Results:			
2.3: Fund training of housing counselors that offer English as a Second Language financial literacy group education and homebuyer education classes.	The number of training sessions offered or sponsored	Annually	HO
Results:			

Impediment 2. Barriers for Protected Classes			
Action	Measurable Objective	Timeline	Responsible Department
Results:			
2.4: Marketing Programs in alternative languages.	The number of programs and languages marketed	Annually	PnR
Results:			
2.5: Provide training to homeless service providers for gender inclusive policies and practices.	The number of trainings and attendees	Annually	HI
Results:			

Impediment 3. Lack of Availability and Access to housing for Persons with Disabilities			
Action	Measurable Objective	Timeline	Responsible Department
Results:			
4.1: Create more accessible units than required by state and federal law through scoring incentives in the multifamily development programs	The number of additional accessible units created	Annually	DEV
Results:			
4.2: Expand accessibility in existing housing through targeted programs and funding	The number of accessible units created and/or modified	Annually	EHS/AM
Results:			
4.3: Continue to require the use of MainehousingSearch.org for MaineHousing projects and promote the use of it by other landlords and the public	The number of projects using MainehousingSearch.org List of activities conducted to promote MainehousingSearch.org The number flagged for accessibility	Ongoing	HCV/HI/PnR/AM

Impediment 3. Lack of Availability and Access to housing for Persons with Disabilities			
Action	Measurable Objective	Timeline	Responsible Department
	hits on MainehousingSearch. org		
Results:			
4.4: Collaborate with other agencies to help persons with disabilities obtain housing	The number of units created or preserved List of initiatives or programs created	Ongoing	HCV/DEV/ AM
Results:			

Impediment 4. Community Planning and Zoning Decisions that Impede Affordable Housing			
Action	Measurable Objective	Timeline	Responsible Department
3.1: Educate the public and local officials on housing issues and MaineHousing programs	The number of meetings and presentations The number of hits on the Maine Housing Data Portal The number of press releases issued The number of interviews by MaineHousing staff	Ongoing	PnR
Results:			

Impediment 4. Community Planning and Zoning Decisions that Impede Affordable Housing			
Action	Measurable Objective	Timeline	Responsible Department
3.2: Support affordable housing projects against NIMBY efforts (discrimination by communities or neighbors) as necessary	The number of projects experiencing NIMBYism supported by MaineHousing	Ongoing	L&C/DEV/PnR
Results:			

Impediment 5. Limited access to neighborhood opportunities and community assets			
Action	Measurable Objective	Timeline	Responsible Department
5.1: Qualified Allocation Plan Incent the development of new housing in areas with access to community assets (location in service center communities with higher need and location near public transportation, schools, employment, services and other amenities important to daily living).	Number of projects awarded LIHTC that are awarded points for community asset factors.	Annually	DEV
Results:			
5.2: Policies to encourage inclusivity in high opportunity communities	List of policies created	Annually	DEV/AM/Director's Team
Results:			
5.3: Increase the use of HCV vouchers in low poverty areas	The number of new tenants leasing up in low poverty areas	Annually	HCV
Results:			

Impediment 6. Lack of Understanding of Fair Housing and Availability of Programs that Affirmatively Further Fair Housing			
Action	Measurable Objective	Timeline	Responsible Department
6.1: Work with organizations to establish initiatives to increase awareness of fair housing and available programs	List of organizations and initiatives	Ongoing	Program Directors
Results:			
6.2: Coordinate fair housing complaint resolution with partners and clients and refer fair housing complaints to appropriate agencies if necessary.	The number of fair housing interventions and/or referrals	Ongoing	L&C/AM/Program Directors
Results:			
6.3: Continue fair housing and accessibility public education programs designed to assist landlords, developers, and relevant professionals	The number of relevant professionals receiving training Trainings offered Policy initiatives to encourage training	Ongoing	DEV/HCV/HO/AM/HI/EHS
Results:			
6.4: Maintain MaineHousing's Fair Housing website page which includes information and resources about fair housing and equal access laws	The number of website hits on the Fair Housing page.	Ongoing	PnR
Results:			
6.5: Provide MaineHousing's Equal Access Communications Guide to employees, contractors, agents, and owners/property managers of multi-family projects	The number of guides distributed/website hits	Ongoing	L&C/AM/PnR
Results:			

Impediment 6. Lack of Understanding of Fair Housing and Availability of Programs that Affirmatively Further Fair Housing			
Action	Measurable Objective	Timeline	Responsible Department
6.6: Provide an internal grievance procedure for applicants and participants to file fair housing complaints about programs and services	The number of internal grievances resolved	Ongoing	L&C/EAC
Results:			
6.7: Education and Outreach Distribute materials on affordable housing and fair housing at conferences, workshops, and other appropriate public venues	The number of people educated at Fair Housing Workshops and Trainings The number of events at which these materials are distributed The number in attendance at the biannual conference	Ongoing	HO/PnR
Results:			
6.8: Coordinate and fund tenant education and financial literacy training for Navigators who in turn deliver financial literacy training for individuals transitioning from homeless shelters to permanent housing	The number of navigators trained The number of clients trained	Annually	HI
Results:			
6.9: Continue to sponsor homeownership education classes that contain information about Fair Housing laws that are relevant to prospective home buyers.	The number of participants in home buyer education classes.	Ongoing	HO
Results:			

Impediment 6. Lack of Understanding of Fair Housing and Availability of Programs that Affirmatively Further Fair Housing			
Action	Measurable Objective	Timeline	Responsible Department
6.10: Provide options for home buyer education in alternative formats and languages	<p>The options and the number of participants</p> <p>The languages offered</p>	Ongoing	HO
Results:			



State of Maine

Community Development Block Grant Program

2025 Program Statement

Office of Community Development
111 Sewall Street, 3rd Floor
59 State House Station
Augusta, Maine 04333-0059
Phone: (207) 624-7484
Fax: (207) 287-8070
TTY: 1-800-437-1220
www.meocd.org

2025 PROGRAM STATEMENT

Contents

<u>SUMMARY</u>	3
<u>SECTION 1. PROGRAM OVERVIEW</u>	3
<u>A. CDBG OBJECTIVES</u>	3
<u>B. METHOD OF DISTRIBUTION:</u>	4
<u>C. STATE ADMINISTRATION:</u>	4
<u>D. PROGRAM TIMEFRAME</u>	5
<u>E. 2025 PROGRAM BUDGET</u>	6
<u>F. CERTIFICATIONS</u>	7
<u>G. GENERAL REQUIREMENTS:</u>	7
<u>H. EXCLUSIONS:</u>	8
<u>I. AWARD PROCESS:</u>	9
<u>SECTION 2. COMMUNITY DEVELOPMENT PROGRAMS</u>	
<u>A. HOUSING ASSISTANCE GRANT PROGRAM</u>	10
<u>B. HOME REPAIR NETWORK PROGRAM</u>	12
<u>C. PUBLIC INFRASTRUCTURE GRANT PROGRAM</u>	13
<u>D. DOWNTOWN REVITALIZATION GRANT PROGRAM</u>	16
<u>E. PUBLIC SERVICE GRANT PROGRAM</u>	19
<u>F. SMALL BUSINESS DEVELOPMENT CENTERS</u>	21
<u>G. MAINE DEVELOPMENT FOUNDATION/MDC ASSISTANCE</u>	22
<u>H. URGENT NEED GRANT PROGRAM</u>	23
<u>I. SPECIAL PROJECTS PROGRAM</u>	25
<u>J. COMMUNITY ENTERPRISE PROGRAM</u>	26
<u>K. RURAL HOUSING PRESERVATION PROGRAM</u>	29
<u>L. YMCA CHILDCARE PROGRAM</u>	30
<u>SECTION 3. ECONOMIC DEVELOPMENT PROGRAMS</u>	
<u>A. ECONOMIC DEVELOPMENT</u>	31
<u>B. MICRO-ENTERPRISE ASSISTANCE GRANT PROGRAM</u>	35
<u>SECTION 4. TECHNICAL ASSISTANCE</u>	36
<u>SECTION 5. REDISTRIBUTION OF GRANT FUNDS</u>	36
<u>SECTION 6. PROGRAM INCOME</u>	36
<u>SECTION 7. APPEALS</u>	37
<u>SECTION 8. AMENDMENTS TO THE PROGRAM STATEMENT</u>	37

The Office of Community Development reserves the right to fund only those applications deemed to be in the best interest of, and that offer definable benefits to, the State of Maine and the Community Development Block Grant Program. The Director of the Office of Community Development (OCD) may waive any requirement of the program provided such waiver would not be out of compliance with CDBG Program regulations.

**MAINE DEPARTMENT OF ECONOMIC AND COMMUNITY DEVELOPMENT
COMMUNITY DEVELOPMENT BLOCK GRANT (CDBG) PROGRAM 2025
PROGRAM STATEMENT**

SUMMARY

This Program Statement describes the method by which 2025 Community Development Block Grant (CDBG) program funds will be distributed. The CDBG program is administered pursuant to 5 M.R.S.A 13073. DECD held an initial virtual combined public forum/hearing regarding the development of this Program Statement on September 8, 2023.

SECTION 1. PROGRAM OVERVIEW

A. CDBG OBJECTIVES

All CDBG funded activities must meet one of three National Objectives of the program. These objectives are:

- Benefit to low and moderate income persons;
- Prevention and/or elimination of slum and blight conditions; and
- Meeting community development needs having a particular urgency.

The Maine CDBG Program serves as a catalyst for local governments to implement programs which meet one of the three National Objectives, and:

- Are part of a long-range community strategy; or State of Maine Strategic Economic Development Plan
- Improve deteriorated residential and business districts and local economic conditions
- Provide the conditions and incentives for further public and private investments
- Foster partnerships between groups of municipalities, state and federal entities, multi-jurisdictional organizations, and the private sector to address common community and economic development problems; and
- Minimize development sprawl consistent with the State of Maine Growth Management Act and support the revitalization of downtown areas.

B. METHOD OF DISTRIBUTION:

DECD, through the Office of Community Development (OCD), offers programs to assist municipalities to achieve their community and economic development objectives. The 2025 Program Statement provides a description of the selection criteria that OCD will use to allocate CDBG funds among communities. Programs are grouped under the three categories listed below.

1. Community Development

- A. Home Repair Network
- B. Housing Assistance Grants
- C. Public Infrastructure Grants
- D. Downtown Revitalization Grants
- E. Public Service Grants
- F. Small Business Development Centers
- G. Maine Development Foundation/Downtown Center Assistance
- H. Urgent Need Grants
- I. Special Projects
- J. Community Enterprise
- K. Rural Housing Preservation Program

2. Economic Development

- A. Grants to Municipalities for Direct Business Support
- B. Micro-Enterprise Grants

3. Technical Assistance

C. STATE ADMINISTRATION:

1. General Administration Allocation: Pursuant to Section 106(d) (3) (A) of the Housing and Community Development Act of 1974, as amended (the Act), the DECD will utilize \$100,000 plus 2% of its allocation from the Department of Housing and Urban Development (HUD) to administer Maine's CDBG Program in accordance with Federal and State requirements.

2. Technical Assistance Administration Allocation: Pursuant to Section 106(d) (5) of the Act, DECD will utilize up to 1% of its allotment from HUD to provide technical assistance in accordance with Federal and State requirements.

3. Exclusion of Entitlement Communities and Counties: The entitlement communities of Auburn, Bangor, Biddeford, Lewiston, Portland and all of Cumberland County with the exception of Brunswick and Frye Island, are not eligible to receive State CDBG program funds.

4. Grant Administration Requirement:

Grantees must employ, or contract with, a qualified CDBG Grant Administrator approved by the Office of Community Development. All planning activities are exempt from this requirement.

D. PROGRAM TIMEFRAME

Application deadlines – All Letters of Intent must be received via e-mail by the Office of Community Development on or before 4:00PM EST on the dates listed below.

Program	Letter of Intent Due Date VIA E-MAIL	Application Due Date By Invitation Only
Downtown Revitalization	January 26, 2025	March 8, 2025
Economic Development	1 st of the month starting July 1, 2025	By invitation only
Housing Assistance	March 22, 2025	May 19, 2025
Public Infrastructure	January 12, 2025	March 1, 2025
Public Service	April 26, 2025	June 7, 2025
Community Enterprise	February 23, 2025	April 12, 2025
Special Projects	TBD	TBD
Urgent Need*	TBD	TBD

*Funding for this program may be available based upon redistribution, reallocation and/or additional allocation from HUD.

E. 2025 PROGRAM BUDGET

2025 CDBG Budget	\$11,808,636
Administration	336,172
Technical Assistance Administration	118,086

Community Development

Rural Housing Preservation Program	1,000,000
Downtown Revitalization Grants	300,000
Home Repair Network Program	1,600,000
Housing Assistance Grants	1,500,000
Public Service Grants	200,000
Public Infrastructure Grants	3,000,000
Regional Council Planning Assistance	150,000
Small Business Development Centers	300,000
Maine Development Foundation/Downtown Center Assistance	300,000
Community Enterprise Grants	600,000
Special Projects	105,821
Urgent Need Grants*	0

Economic Development

Economic Development Grants	1,000,000
Micro-Enterprise Assistance Grants	1,200,000

TOTAL 2025 CDBG Funds	11,808,636
Funding for individual categories may change based on actual HUD award.	

*Funding for this program may be available based upon redistribution, reallocation and/or additional allocation from HUD.

F. CERTIFICATIONS

All communities applying for CDBG funds must certify that they will:

- Minimize displacement and adhere to a locally adopted displacement policy in compliance with section 104(d) of the Housing and Community Development Act, 24 CFR part 42;
- Take action to affirmatively further fair housing and comply with the provisions of Civil Rights Acts of 1964 and 1968;
- Not attempt to recover certain capital costs of improvements funded in whole or in part with CDBG funds;
- Establish a community development plan;
- Meet all required State and Federal public participation requirements;
- Comply with the Federal requirements of Section 319 of Public Law 101-121, codified at 31 U.S.C. Section 1352, regarding government-wide restriction on lobbying;
- With the exception of administrative or personnel costs, verify that no person who is an employee, agent, consultant, officer, elected officer, or appointed official of State or local government or of any designated public agencies, or sub-recipients which are receiving CDBG funding may obtain a financial interest or benefit, have an interest in or benefit from the activity, or have an interest in any contract, subcontract, or agreement with respect to CDBG activities;
- Any person or firm associated with the administration of the CDBG program award is not on the U.S. Department of Labor's Debarred and Suspended Contractor's List; and
- Review the project proposed in the application to ensure it complies with the community's comprehensive plan and/or applicable state and local land use requirements.

G. GENERAL REQUIREMENTS:

1. Eligible Applicants: All units of general local government in Maine, including plantations, except for the entitlement communities of Auburn, Bangor, Biddeford, Lewiston, Portland and all of Cumberland County with the exception of Brunswick and Frye Island are eligible to apply for and receive State CDBG program funds. County governments may apply on behalf of the Unorganized Territory. Groups of local governments may apply for multi-jurisdictional or joint projects. Multi-jurisdictional applications require designation of one local government as the lead applicant and consent for that designation by each participating local government. Counties may apply for the Public Service program on behalf of a collaboration of communities. **Eligible applicants, including counties as defined above may apply for CDBG assistance on behalf of the five Maine Indian Tribes. Maine Indian Tribes are not themselves eligible applicants.** Eligible applicants applying on behalf of a Maine Indian Tribe are

permitted to apply in the same 2025 CDBG funding category only if the eligible applicant will not directly benefit from the tribal CDBG project.

2. Eligible Activities: Applications will be reviewed to determine that the activities proposed are eligible under Section 105(a) of the Act. Ineligible activities will not be considered.

3. Project Benefit: Letters of Intent and/or required documentation for all programs will be reviewed to verify that the proposed activities meet at least one of the CDBG Program national objectives pursuant to section 104(b) 3 of the Act. If the activity does not meet a national objective the application will not be considered for funding.

4. “Growth Related” Preference: In accordance with M.R.S.A Title 30-A section 4349-A (3-A), OCD is required to give preference in the award of grants to capital investments defined as “growth related” in section 4301(5-B) to communities with certified growth management programs or that have adopted a comprehensive plan and implementation strategy consistent with the goals and guidelines of the subchapter. A municipality that does not obtain a certificate or finding of consistency within 4 years after receipt of the first installment of a financial assistance grant or rejection of an offer of financial assistance will receive a low priority.

5. Repayment of Grant Funds: Recipients must repay on demand to the State of Maine all funds expended if CDBG program benefits are not achieved as specified in their contract with the DECD.

6. Application Threshold: Incomplete and/or non-conforming applications which do not meet the specifications set forth in the 2025 Program Statement and 2025 CDBG Application Packages will be removed from the scoring process during the threshold review.

7. Financial Commitments: Applications for projects not demonstrating a firm financial commitment as required in the application materials will be removed from the scoring process during the threshold review.

8. Restriction of Grant Awards: OCD may deny or restrict the award of grants to communities with outstanding audit(s), monitoring findings, or a record of administrative misconduct.

9. Past Performance: In order to be eligible to apply for a 2025 Community Development Block Grant program, communities that received CDBG grants in prior years must be in good standing with the Office of Community Development. All Past Performance Criteria will be strictly enforced; however, these criteria may be waived for just cause by the Director of OCD.

10. Grant Termination: OCD may terminate a community’s grant if progress on the project is not apparent within 6 months from the date of contract signing. The Office of Community Development may grant waivers for just cause.

H. EXCLUSIONS:

1. Multiple Grants: Eligible applicants may not apply for, or benefit from, more than one grant per program category in any grant year. Communities participating in multi-jurisdictional applications may submit their own applications for the same program as long as they demonstrate that there will not be a duplication of program activity/benefit.

2. Housing Assistance Grant Program: Communities are not eligible to apply for a HA grant unless they have an identified project with a developer approved by OCD. Single family rehabilitation is not an eligible project.

I. AWARD PROCESS:

1. Scoring:

The Review Team will assign a score to each of the scoring areas and the application's total score will be determined by the sum of the Review Team's scores. The top scoring applications will be considered for an invitation into the Project Development Phase.

An invitation into the Project Development Phase is not a guarantee of funding or permission to obligate funds. Successful communities will receive an amount determined by the OCD for their project.

2. Project Development Phase:

a. Project Planning: Details of the project including engineering, bid requirements, budget, and/or grant administration.

b. Acceptance of Funds: Public Hearing and Legislative Body Approval for the acceptance of funds.

c. Local Certifications: Local adoption of State and Federal regulations..

d. Project Benefit: Verification that proposed activities meet or will meet one of the CDBG Program National Objectives.

e. Environmental Review: Review of project for compliance with State and Federal Environmental Regulations.

3. Project Development Timeframe and Assistance:

The goal of the Project Development Phase is a grant contract for CDBG funds. An OCD Development Program Manager will be assigned to work closely with each community to finalize their project. OCD will rescind the CDBG program award offer if the community is not under contract within six months of the date of the award offer and invitation into the project development phase process. The Office of Community Development may grant waivers for just cause.

SECTION 2. COMMUNITY DEVELOPMENT PROGRAMS

A. HOUSING ASSISTANCE GRANT PROGRAM

The Housing Assistance Grant (HA) Program provides funding to address housing problems of low-and moderate-income persons. Housing Assistance Program (HA) funds will be distributed through an annual grant application selection process.

1. Eligibility Requirements for Housing Assistance Applications: Communities must have an identified project with a developer approved by OCD.

2. Eligible Activities: Eligible HA activities are rehabilitation of occupied or vacant multi-family housing units, conversion of non-residential structures, homeownership/down payment assistance, construction of new units by a non-profit community-based housing development organization

3. Matching Funds: Applicants for housing activities must provide a cash match of at least 20% of the total HA project cost.

4. Maximum HA Grant Amount: \$500,000

5. Maximum Administrative Costs: The HA Program may allow expenditures for general and/or rehabilitation administration. The total general and rehabilitation administration expenditures may not exceed 15% of the grant amount. **Please refer to OCD Policy Statement #2 for more information regarding CDBG administrative costs.**

6. Selection Process: The selection process for all HA applications will consist of two stages:

(a)Stage 1:

Letter of Intent: All communities wishing to submit a HA application must submit a Letter of Intent. After review for completeness and eligibility, units of general local government may be invited to make a full application. Please refer to Page 5 of this document for Program deadlines and due dates.

(b)Stage 2:

Application: The maximum length of an application is **four pages (not counting required attachments)**. Please refer to Page 5 of this document for Program deadlines and due dates. Members of the Review Team will assign a Review Point Total for each application reviewed. Review Point Totals will consist of the sum of the three scoring areas below and be determined by the total of each sub-scoring area. A maximum of 100 points is obtainable.

Impact (40 points):

- A description of the specific housing problems to be addressed with HA funds – 15 points
- How the problems were identified – 10 points
- How these issues affect LMI persons in the community or region – 15 points

Development Strategy (40 points):

- A description of the plan proposed to implement the housing project – 20 points
- Summary of the activities and use of HA funds –20 points

Citizen Participation (20 points):

- How overall citizen participation process directly relates to identification of solution strategies and application development - 4 points
- Effective use of any media (newspapers, radio, TV, etc.) to further public awareness and participation – 4 points
- Relevance of listed meeting/hearing activities/comments (not counting required public hearing) on application and project development – 4 points
- Involvement of potential LMI project beneficiaries in development of the application and project and how the required public hearing relates to the application development and citizen participation process – 4 points
- How other local resources (cash and in-kind) are directly related to the project and the establishment of a cash value equivalent for all in-kind commitments – 4 points

7. Final Application Score – Each application will receive a Final Application Score assigned by members of the Review Team. The top scoring applicants will be considered for an invitation to proceed to the Project Development Phase as funds allow.

B. HOME REPAIR NETWORK PROGRAM

The Home Repair Network Program (HRN) provides funding statewide to address housing problems of low- and moderate-income persons. This program will provide housing rehabilitation services administered on a regional basis throughout Maine, as stated below.

1. Special Threshold Criteria and Certifications: HRN Program funds will be distributed through a set aside of CDBG funds provided to the City of Rockland as the lead community. The lead community will establish a legally binding contract with each of the participating Maine Community Action Agencies (or other approved entity) to provide Housing Rehabilitation Services in the region. Participation in the HRN delivery system is subject to the approval of the Director of the OCD.

2. Eligible Activities: Eligible activities under the HRN Program include but are not limited to: rehabilitation of occupied or vacant single-family or multi-family housing units, demolition, same site replacement housing, provision of potable water and sewer, energy conservation, removal/mitigation of lead-based paint, asbestos, radon, or other hazardous material, necessary ADA modifications, special eligible housing projects approved by OCD.

3. Housing units ineligible for Home Repair Network assistance: Housing units located in communities that have current CDBG Housing Rehabilitation programs or the entitlement communities of Auburn, Bangor, Biddeford, Lewiston, Portland and all of Cumberland County with the exception of Brunswick and Frye Island are not eligible for financial assistance under the HRN program.

4. Maximum HRN Grant Amount: Allocations to each of the established regions will be determined by the Office of Community Development.

5. Maximum Administrative Costs: The HRN Program allows expenditures for general and rehabilitation administration. The total general and rehabilitation administration expenditures may not exceed 20% of the grant amount. The City of Rockland is allowed a maximum of \$5,000 in administrative funding.

6. Section 8 Housing Quality Standards: All units assisted or created with HRN funds will strive to meet HUD Section 8 Minimum Housing Quality Standards if possible. This does not apply to projects undertaken to correct specific emergency health and safety issues only, i.e. wells, septic, heating units, removal of hazardous materials, energy conservation etc. In addition, all units must comply with other applicable standards included in the HRN contract.

C. PUBLIC INFRASTRUCTURE GRANT PROGRAM

The Public Infrastructure Grant (PI) Program provides gap funding for local infrastructure activities, which are part of a community development strategy leading to future public and private investments.

1. Eligible Activities: Eligible activities in the PI Program are construction, acquisition, reconstruction, installation, relocation assistance **associated with** public infrastructure, and public infrastructure limited to supporting construction of fully-funded affordable LMI housing; eligible planning activities necessary to complete the Project Development Phase.

2. Exclusions: See Section 1H (1) (2).

3. Match: All communities applying for PI funds must certify that they will provide a cash match of at least 25 percent of the total grant award. This match may consist of all non-CDBG loans, grants etc. contributed to the project.

4. Program Activities: Applicants may apply for one or more activities within a specific activity group. Applicants cannot mix activities from different activity groups in an application.

Activity Group Numbers:

- 1) Water system installation/improvements, sewer system installation/improvements, water/sewer system hookups, storm drainage, utility infrastructure, dams with the main purpose of providing the primary water storage facility for an active water district or municipal system. **Maximum Amount: \$1,000,000**
- 2) Infrastructure in support of new LMI affordable fully financed housing. **Maximum Amount: \$1,000,000**

5. Funding Restrictions: PI funds may not be used to assist infrastructure for the purpose of job creation/retention. Job creation/ retention infrastructure activities are eligible in the Economic Development Program. Except for proposals for infrastructure in support of new housing construction and sewer/water system hookups, no housing activities may be assisted with PI funds.

6. Demonstration of National Objective: Applicants must demonstrate at Letter of Intent that the project meets the National Objective of benefiting 51% or greater low/moderate income persons via Census information, or a certified target area survey.

7. Selection Process: The selection process for all PI applications will consist of two stages:

(a) Stage 1:

Letter of Intent and Verification of CDBG National Objective: All communities wishing to submit a PI application must submit a Letter of Intent and Verification of CDBG National Objective to OCD. After review for completeness and eligibility, units of

general local governments may be invited to make a full application. Please refer to Page 5 of this document for Program deadlines and due dates.

(b) Stage 2:

Application: Please refer to Page 5 of this document for Program deadlines and due dates.

Each application will be rated in relation to all others in a two-stage process. Members of the Review Team will assign a Review Point Total for each application reviewed. Review Point Totals will consist of the sum of the three scoring areas below and be determined by the total of each sub-scoring area.

Impact (40 points):

- A description of why the project is necessary, previous efforts to address needs, and how the project was prioritized locally –6 points
- What engineering firms and/or regulatory agencies have verified the infrastructure problems, and what studies and testing have been done that corroborate the need– 6 points
- How the verified health, safety and welfare conditions affect users and others in the community and region –8 points
- Size and demographic makeup of user base and target area of projected infrastructure project –10 points
- Why PI funds are necessary to fill a funding gap, what other state and/or federal agency funding is involved, capacity of the utility or town to borrow, and how match funds will work with PI funds to implement the project –10 points

Development Strategy (40 points):

- A description of the proposed infrastructure improvements, including size, capacity, design, utilities and fit with existing systems – 10 points
- Positive impacts on health, safety and welfare of users directly attributable to proposed PI expenditures –5 points
- Extent of financial benefits to users; list current user rates, what rates will be if PI funding is approved, and list what user rates will be if the project is built without PI funding –15 points
- Project timeline: list tasks necessary to begin implementation. Identify work already completed, such as engineering, design and final commitment of other funds. Identify when remaining tasks will be completed. Estimate a project completion date and describe why project timeline is feasible –10 points

Citizen Participation (20 points):

- How overall citizen participation process directly relates to identification of solution strategies and application development - 4 points
- Effective use of any media (newspapers, radio, TV, etc.) to further public awareness and participation – 4 points

- Relevance of listed meeting/hearing activities/comments (not counting required public hearing) on application and project development – 4 points
- Involvement of potential LMI project beneficiaries in to the application development and citizen participation process – 4 points
- How other local resources (cash and in-kind) are directly related to the project and the establishment of a cash value equivalent for all in-kind commitments – 4 points

8. Final Score Each application will receive a Final Application Score assigned by members of the Review Team. The top scoring applicants will be considered for an invitation to proceed to the Project Development Phase as funds allow.

D. DOWNTOWN REVITALIZATION GRANT PROGRAM

The Downtown Revitalization Grant (DR) Program provides funds to communities to implement comprehensive, integrated, and innovative solutions to the problems facing their downtown districts. These community revitalization projects must be part of a strategy that targets downtown service and business districts and will lead to future public and private investment. Qualified applicant communities must have a downtown district meeting the definition in 30-A M.R.S.A. Section 4301(5-A). Please refer to Page 5 of this document for Program deadlines and due dates.

1. Eligible activities - include all those eligible under the Public Facilities, Public Infrastructure, Housing Assistance or Micro Enterprise Assistance programs as relevant to the revitalization of a downtown district; and eligible planning activities necessary to complete the Project Development Phase.

2. Exclusions: See Section 1H (1) (2).

3. Match – All communities applying for DR Program funds must certify that they will provide a minimum cash match equivalent to 25 percent of the total grant award. This minimum 25% match may come from any source public and/or private. All match must be fully committed at time of application.

4. Planning Requirements: Applicants must have completed a comprehensive downtown revitalization planning process within the past five years. Communities with plans older than five years must demonstrate that their plans are under active implementation, the action plan remains valid, or have been updated within the past 5 years. The proposed DR activities must be in the plan as recommended actions necessary for downtown revitalization.

5. Maximum DR Award: \$300,000

6. Bonus Points for Applicants with Maine Downtown Center Designation: Applicants will receive three bonus points if they have been designated as a Main Street Maine Community by the Maine Downtown Center, or one bonus point if they have been designated as a Maine Downtown Network Community.

7. Demonstration of National Objective: Applicants must demonstrate that the project meets the National Objective of 1) benefiting 51% or greater low/moderate income persons or 2) preventing or eliminating slum or blighting conditions. Census information, a certified town-wide income survey, or an officially adopted declaration of slum/blight conditions conforming to the requirements of Title 30-A M.R.S.A § 5202 and HUD must be submitted to OCD. ***These demonstrations must be made as part of the Letter of Intent and Verification of CDBG National Objective submitted to OCD.***

8. Selection Process – The selection process will consist of two stages

(a) Stage 1:

Letter of Intent and Verification of CDBG National Objective:

All communities wishing to submit a DR application must submit a Letter of Intent. After review for completeness and eligibility, units of general local governments may be

invited to make a full application. Please refer to Page 5 of this document for Program deadlines and due dates.

(b) Stage 2:

Application: The maximum length of an application is **six pages, not counting required attachments.**

Please refer to Page 5 of this document for Program deadlines and due dates.

Each application will be rated in relation to all others. Members of the Review Team will assign a Review Point Total for each application reviewed. Review Point Totals will consist of the sum of the three scoring areas below and be determined by the total of each sub-scoring area.

Impact (40 points):

- Describe the scope and magnitude of the problems you seek to address. Describe how they are obstacles for revitalizing the downtown. – 8 points
- Explain how these problems negatively impact the viability of existing downtown businesses, and how they limit new development and expansion. –12 points
- Demonstrate how the problems impacting the downtown affect LMI persons, or how they contribute to slum/blight conditions. –8 points
- Explain why DR funds are necessary for the project, and describe what efforts have been made and where you have searched to secure other grant or loan funds, –12 points

Development of Strategy (40 points):

- Clearly link the proposed DR activities to action steps outlined in your community's Downtown Action Plan and explain how the activities of the project will stimulate economic activity in the downtown. –12 points
- List the specific activities to be addressed in this downtown revitalization effort, and identify the tasks to be undertaken with DR funds and the activities to be undertaken with each other source of funds. –12 points
- Define how the proposed DR activities provide a solution to the problems and assist in improving the area's viability, and how the activities will have a positive impact on LMI persons, or on alleviation of the slum/blight conditions. –8 points
- Describe the capacity and experience of the administrator who will be implementing the project, describe the engineering and design work completed to date, provide a project timeline, and explain how DR funds will be expended in a timely manner. – 8 points

Citizen Participation (20 points):

- Effective use of media (newspapers, radio, TV, web etc.) to further public awareness and participation. – 4 points
- Relevance of listed meeting/hearing comments (not counting required public hearing) and the overall citizen participation process in application and project development. – 4 points

- Involvement of downtown and local businesses, Chambers of Commerce, development groups or other business related organizations in identification of problems and development of the application and project. – 4 points
- Involvement of potential LMI project beneficiaries in development of the application and project, and how the required public hearing relates to the application development and citizen participation process. – 4 points
- How other local resources (cash and in-kind) are directly related to the project, and the establishment of a cash value equivalent for all in-kind commitments. – 4 points

Maine Downtown Center Designation Bonus – 3 bonus points will be assigned to each applicant community designated as a Main Street Maine Community by the Maine Downtown Center, and a 1 bonus point will be awarded to those communities designated as a member of the Maine Downtown Network.

Opportunity Zone Bonus – 3 bonus points will be assigned to each applicant community certified as an Opportunity Zone location at time of application.

9. Final Application Score – Each application will receive a Final Application Score assigned by members of the Review Team plus any applicable Maine Downtown Center and/or Opportunity Zone Bonus points. The top scoring applicants will be considered for an invitation to proceed to the Project Development Phase as funds allow.

E. PUBLIC SERVICE GRANT PROGRAM

The Public Service Grant (PSG) Program addresses community and business resource needs by providing funding for operating expenses, equipment, and program materials for activities which will benefit low/moderate income (LMI) persons. Please refer to Page 5 of this document for Program deadlines and due dates.

1. Eligible Activities: Eligible activities include but are not limited to, operating and program material expenses for the purpose of providing workforce training and skills development, child care, health care, recreation programs, education programs, public safety services, fair housing activities, senior citizen services, homeless services, drug abuse/mental health counseling and treatment.

2. Project Benefit: Eligible PSG projects must provide benefits to one of the groups of persons listed below and be in support of an identified business or non-profit entity:

(a) Participants in a program where 51% or greater of the persons receiving benefit from PSG activities are determined to be LMI.

(b) Persons who are members of the following groups that are currently presumed by HUD to meet benefit requirements. The presumption may be challenged if there is substantial evidence the group served by the project is most likely not comprised of principally LMI persons;

- Abused Children (Does not include “at-risk” youth)
- Battered Spouses (Does not include all victims of domestic violence)
- Elderly Persons (62 years +, or 55 years + for housing)
- Severely Disabled Adults
- Homeless Persons
- Illiterate Adults
- Migrant Farm Workers
- Persons Living with AIDS

3. All communities applying for PSG funds must certify that: The activity represents a new service to the community; or a quantifiable increase in the level of an existing service;

4. Maximum PSG Amount: \$50,000

5. Selection Process: The selection process will consist of two stages

(a) Stage 1:

Letter of Intent: All communities wishing to submit a PSG application must submit a Letter of Intent. Please refer to Page 5 of this document for Program deadlines and due dates. After review for completeness and eligibility, units of general local governments will be invited to make a full application.

(b) Stage 2:

Application: The maximum length of an application is **four pages, not counting required attachments**. Please refer to Page 5 of this document for Program deadlines and due dates.

Members of the Review Team will assign a Review Point Total for each application reviewed. Review Point Totals will consist of the sum of the three scoring areas below and be determined by the total of each sub-scoring area. A maximum of 100 points is obtainable.

Impact (40 points):

- Conditions requiring a new or expanded service – 15 points
- Issues faced by service providers including capacity, finances and staffing – 15 points
- Why PSG funds are critical for the project – 10 points

Development Strategy (40 points):

- A description of the new or expanded service, specific use of PSG funds, including how this service will resolve identified problems, and why this service will be more effective than existing services for the targeted beneficiaries – 10 points
- How PSG funds will be utilized to assist LMI persons or a HUD approved Limited Clientele group – 10 points
- Project timeline, including a start date, tasks completed to date, how PSG funds will be expended in a timely manner, and method of tracking success – 10 points
- Capacity and qualifications of the service provider implementing the project, including familiarity with the needs of project beneficiaries – 10 points

Citizen Participation (20 points):

- How overall citizen participation process directly relates to identification of solution strategies and application development - 5 points
- Effective use of any media (newspapers, radio, TV, etc.) to further public awareness and participation – 5 points
- Relevance of listed meeting/hearing activities/comments (not counting required public hearing) on application and project development – 5 points
- Involvement of potential LMI project beneficiaries in development of the application and project and how the required public hearing relates to the application development and citizen participation process – 5 points

6. Final Application Score – Each application will receive a Final Application Score assigned by members of the Review Team. The top scoring applicants will be considered for an invitation to proceed to the Project Development Phase as funds allow.

F. SMALL BUSINESS DEVELOPMENT CENTERS

The Small Business Development Center Technical Assistance (SBDCTA) provides funding for the provision of technical assistance to Maine micro-enterprise businesses through a partnership with Maine's Small Business Development Centers.

1. Special Threshold Criteria and Certifications: SBDCTA will be distributed through a set aside of CDBG funds provided to the County of Aroostook as the lead community. The lead community will establish a legally binding contract with the SBDC as approved by OCD.

(a) Eligible Activities:

(i) Eligible activities under the SBDCTA are technical assistance to verified Maine micro-enterprise businesses and potential start-up companies which can be reasonably expected to become a micro-enterprise business.

(b) Communities ineligible for SBDCTA Assistance:

(i) Micro-enterprise businesses and potential start-up companies located in the communities of Auburn, Bangor, Biddeford, Lewiston, Portland and all of Cumberland County except for Brunswick and Frye Island, are not eligible for financial assistance under the SBDCTA.

G.MAINE DEVELOPMENT FOUNDATION/DOWNTOWN CENTER ASSISTANCE

The Maine Development Foundation/ Downtown Center Assistance (MDFDCA) provides funding to support activities undertaken by the Maine Development Foundation/ Downtown Center on behalf of communities addressing critical needs including but not limited to established downtown areas. The funds may be used to match other financial assistance received through the Maine Development Foundation to further address community development needs.

1. Special Threshold Criteria and Certifications: MDFDCA funds will be distributed through a set aside of CDBG funds provided to the City of Belfast who will be the lead community. The City of Belfast will establish a legally binding contract with the Maine Development Foundation as approved by OCD.

2. Eligible Activities: Eligible activities under the MDFDCA are planning, capacity building, technical assistance and administration directly related to building vibrant, sustainable communities and downtowns.

3. Communities Ineligible for MDCA Assistance: The entitlement communities of Auburn, Bangor, Biddeford, Lewiston, Portland and all of Cumberland County, with the exception of Brunswick and Frye Island are not eligible for financial assistance under the MDCA.

H. URGENT NEED GRANT PROGRAM

The Urgent need Grant (UN) Program provides funding to communities to address serious and immediate threats to health and welfare which are declared state or federal disasters.

1. Project Eligibility: Pursuant to Section 104 (b) 3 of the Housing and Community Development Act of 1974, as amended (see 24 CFR Section 570.483(d)), the applicant must address a community development need which meets all four criteria listed below:

- (a) poses a serious and immediate threat to the health or welfare of the community;
- (b) originated or became a direct threat to public health and safety no more than 18 months prior to submission of the application;
- (c) is a project the applicant cannot finance on its own. “Cannot finance on its own” means, that the town’s tax burden, regulatory structure, utility user fees, bonding capacity, or previous or existing budgetary commitments, precludes it from assuming the additional financial obligation needed for this project; and
- (d) cannot be addressed with other sources of funding.

2. Program Requirements:

(a) Necessary Documentation: The emergency situation must require immediate action to alleviate the serious and imminent threat of injury or loss of life resulting from a natural or man-made cause.

(b) State or Federal Declaration of Disaster: The applicant must submit documentation that the project to be assisted with UN funds will take place in an area that has received a state or federal declaration of disaster. In addition, the activities to be assisted must be a direct result of the event leading to the declaration. This requirement may be waived by the Director of OCD with just cause.

(c) Application Submittal: Applicants must submit a complete UN application that includes all required information and documentation.

3. Selection Process: The selection process will consist of two stages: an application phase and a project development phase.

(a) Stage 1:

Application: An UN application must include the following:

- documentation that the emergency situation was prompted by natural or man-made causes that pose an imminent threat of injury or loss of life;
- certification that the proposal is designed to address an urgent need and an immediate response is required to halt the threat of injury or loss of life;

- information regarding when the urgent need condition occurred or developed into a threat to health and safety;
- evidence confirming the applicant is unable to finance implementation on its own; and,
- documentation that other financial resources are not available to implement the proposal.
- a copy of a state or federal declaration of disaster.

(b) Stage 2:

Project Development: Prior to consideration of a grant award, all UN proposals must meet the four eligibility criteria listed above and the Program requirements. Project Development Phase applications must comply with the following:

Project Planning: Details of the project including engineering, cost analysis, feasibility, and structural analysis as necessary.

Management Plan: Details of the structure and methods established by the community for program management.

Regulations: Project Development Phase applications will be reviewed for compliance with State and Federal regulations.

4. Approval Process: Applications will be accepted on a first-come first-served basis. Following receipt of an application, OCD shall review the application and verify that it contains all the required information. Eligible planning activities necessary to complete the Project Development Phase may be included in the UN grant total. Notification to the applicant of the Office of Community Development's decision will initiate the Project Development Phase process necessary for contract award.

I. SPECIAL PROJECTS PROGRAM

The Special Projects Program provides funds to projects that are not funded through the normal CDBG application process. SP funds will be used for alternative OCD grant activities and partnerships that meet the community or economic development needs of municipalities and CDBG National Objectives in the State of Maine. Approval for the use of SPMF funds is through the Director, Office of Community Development.

J. COMMUNITY ENTERPRISE GRANT PROGRAM

The Community Enterprise Grant (CE) Program provides grant funds to assist in business façade programs and to make streetscape improvements in downtown and village areas. Assistance to businesses may be in the form of grants or loans at the discretion of the community. Please refer to Page 5 of this document for Program deadlines and due dates.

1. Threshold Criteria and Program Requirements: CE Program funds will be distributed through an annual grant application selection process.

(a) Eligible Activities:

Eligible activities under the façade grants to for-profit or non-profit businesses are for exterior improvements, including signage, painting, siding, awnings, lighting, display windows and other approved exterior improvements (**interior improvements are not allowed**) and eligible activities under streetscapes include pocket parks, benches, street lighting, tree plantings, signage, traffic calming improvements, sidewalks and other approved improvements; eligible planning activities necessary to complete the Project Development Phase. **Sewer, water, storm drainage, parking, roads or streets and other infrastructure improvements and buildings solely for residential use are not eligible. All streetscape improvements must take place on publicly owned property.**

(b) Downtown Revitalization Program Prohibition - Communities applying for a CE grant may not apply for, receive, or benefit from a Downtown Revitalization Program (DR) grant in the same program year.

(c) Maximum CE Grant Amount: \$100,000 - Applicants may apply to address one or any combination of eligible activities listed above but are limited to a total of \$100,000 in CE funds.

(d) Maximum Amount of Community Enterprise Grant/Loan Assistance to Businesses: \$25,000

(e) Match – All communities applying for CE Program funds must certify that they will provide a minimum cash match equivalent to 25 percent of the total grant award. This minimum 25% match may come from any source public and/or private. All match must be fully committed at time of application.

(f) Project Benefit:

(i) Business Facade Grants: Project benefit will be met when exterior improvements and signage on an existing business take place in a designated slum/blight area, or documentation exists that a business qualifies under a spot blight basis.

(ii) Streetscapes: Project benefit will be met when streetscapes take place in a designated slum/blight area or the applicant

community where the project will take place is 51% or greater LMI as determined by HUD and the U.S. Census.

2. Special Program Requirements

Demonstration of National Objective: Applicants must demonstrate that the project meets the National Objective of 1) benefiting 51% or greater low/moderate income persons, or 2) preventing or eliminating slum or blighting conditions. Census information, a certified target area survey, an officially adopted declaration of slum/blight conditions conforming to the requirements of MRSA Title 30-A, Chapter 205, 5202 and HUD, or assurances of spot blight designation eligibility must be submitted to OCD. ***These demonstrations must be made as part of the Letter of Intent and Verification of CDBG National Objective submitted to OCD on or before 4:00pm on Friday February 25, 2025.***

3. Selection Process: The selection process will consist of three phases; a letter of intent, an application phase and a project development phase.

(a) Letter of Intent and Verification of CDBG National Objective:

All communities wishing to submit a CE application must submit a Letter of Intent and Verification of CDBG National Objective to OCD on or before 4:00PM on Friday January 29, 2025 according to the requirements set forth in the 2025 CE application package.

(b) Application: The maximum length of an application is **four pages, not counting required attachments**. The application deadline for the CE Program is 4:00 PM on April 9, 2025.

(i) Impact (40 points):

*State the problems then present the scope and magnitude of the identified problems. – 6 points

*Explain how the problems negatively impact the local economy and the viability of existing downtown or village area. – 8 points

*Clearly define how the problems negatively affect LMI persons and/or contribute to slum/blight conditions. – 10 points

*Describe the obstacles to overcoming the identified problems. – 6 points

*Explain why CE funds are necessary for the project; describe efforts to secure other grant or loan funds and tell why they are not available locally to assist businesses or local government with their development and site improvement needs. – 10 points

(ii) Development Strategy (40 points):

*List the specific activities to be undertaken in the project. For streetscapes include location, size and design features. – 5 points

*Identify the specific use of CE funds and the specific tasks or activities to be funded with each other source of funds. – 5 points

*Provide Identification and description of potential business façade applicants and their needs; **or** provide details of how areas in need of streetscape improvements were identified and prioritized. – 5 points

*Explain how the CE project will stimulate business in the downtown or village area and assist in improving the area's long-term viability. – 6 points

*Describe how the CE funded activities will have a positive impact on LMI persons and/or on alleviation of the slum/blight conditions. – 6 points

*Provide a project timeline; list activities or actions completed to date. – 4 points

*Describe the capacity and experience of the administrator to market and conduct a facade program **or** streetscape improvement effort; and describe how CE funds will be expended in a timely manner. – 5 points

*Budget Summary Review – 4 points

(iii) Citizen Participation (20 points):

*Effective use of any media (newspapers, radio, TV, etc.) to further public awareness and participation. – 4 points

*Relevance of listed meeting/hearing activities/comments (not counting required public hearing) and the overall citizen participation process in application and project development. – 4 points

*Involvement of downtown and local businesses, Chambers of Commerce, development groups or other business-related organizations in identification of problems and development of the application and project. – 4 points

*Involvement of potential LMI project beneficiaries in development of the application and project and how the required public hearing relates to the application development and citizen participation process. – 4 points

*How other local resources (cash and in-kind) are directly related to the project and the establishment of a cash value equivalent for all in-kind commitments. – 4 points

Opportunity Zone Bonus – 3 bonus points will be assigned to each applicant community certified as an Opportunity Zone location at time of application.

Stage 2: Final Application Score – Applications will be awarded funding based on the consensus of the review team. There is no minimum Final Application Score required for an application to be considered for funding.

K. RURAL HOUSING PRESERVATION PROGRAM

The State of Maine has over 8,000 units of federally assisted housing at risk from a series of dynamics including expiring restrictions, maturing mortgages, aging owners and subsequent conversion to market rate. These affordable projects are primarily in small rural Maine towns and may be the only affordable and/or rental housing in the community. The loss to the communities is staggering when compared to new construction costs and volatile demand from the private market. Preservation of the existing federal assistance is crucial to stable housing conditions in Maine's rural communities. Due to complex regulation and restrictions there is a gap in funding the successful transfers of these assets to new owners and protecting the most valuable segment - the affordable rental unit for local Maine residents. The RHP Program will provide an additional grant resource which will serve as the missing piece to solving the gaps and challenges found in many of these transactions.

1. Threshold Criteria: RHP Program funds will be distributed through a set aside of CDBG funds provided to the City of Presque Isle as the lead community. The lead community will establish a legally binding contract with the Genesis Fund, a statewide Community Development Financial Institution, to provide funds for the preservation and rehabilitation of multifamily rental properties in rural Maine communities for the benefit of low-income households. The Genesis Fund is actively and intricately involved in this work on policy, on technical assistance and on financing the solutions. A seasoned administrator of CDBG funds, the Genesis Fund has a demonstrated track record of successfully implementing this resource for the direct benefit to low income households.

2. Eligible activities: Funds will be used for property acquisitions; to reduce debt financing burdens on the protected unit rents; to cover transaction and soft costs to accomplish the transfers; and for closing charges.

3. Maximum RHP Grant Amount: \$1,000,000. Allocations to each rural multifamily property will be determined by the Genesis Fund. RHP funds will be used to fill gaps in project financing.

4. Matching Funds: The Genesis Fund will bring together capital resources and technical assistance to facilitate the transfer of rural multifamily properties to new owners. These resources include a new State Housing Tax credit, a dedicated set aside in the Maine QAP of LIHTC for preservation of rural federally assisted housing, and a dedicated loan fund at Genesis for preservation supported by Federal Home Loan Bank of Boston. These and other resources will adequately supply matching funds RHP Program.

5. Maximum Administrative Costs: The RHP Program allows expenditures for general and rehabilitation administration. The total general and rehabilitation expenditures will not exceed 15% of the grant amount. The City of Presque Isle is allowed a maximum of \$3,000 in general administrative funding.

6. Property Standards: All rehabilitation activities completed with this Program will comply with federal, state and local building codes and requirements and will meet any applicable federal agency property standards.

L. Maine YMCA Alliance Childcare Program

Aroostook County will be the recipient of CDBG funds and will contract with the YMCA Alliance of Northern New England to provide childcare scholarships to income eligible households statewide.

The YMCA Alliance of Northern New England supports collaboration amongst Maine's 15 Ys and community partners. Due to its unparalleled reach, the Y is a powerful advocate for communities and is familiar with the needs of the children, families, and individuals throughout the region.

Collectively, the 15 YMCAs are the largest provider of early education and before/after school programming in the state. Annually they serve over 3,700 young children in their early education programs, over 7,300 children in the before and after school programs, and summer day and overnight camps. These childcare programs provide a safe environment for children and peace of mind for working families.

Statement of Need

Prior to the COVID-19 pandemic, Maine was already experiencing a critical shortage of childcare options for families, and the childcare system was showing worrying signs of vulnerability, including program closures and workforce shortages. The resulting fallout from the pandemic is laying bare and exacerbating these weaknesses, while also highlighting in new ways how vital safe, quality childcare is for families and our economy. It is clearer than ever that the early childhood education and school-aged childcare sectors are important building blocks of a healthy economy and deserving of public investment.

Low and moderate income (LMI) families are particularly vulnerable to the disruptions caused by the pandemic and in critical need of additional support to ensure safe and quality care for their children. More resourced families may have more options, which could include a parent reducing work hours or leaving the workforce or paying for additional hours of care; these are simply not options for many LMI families. CDBG funding support will be critical to help fill these gaps; many families cannot afford to cover the increased costs of care, and providers cannot operate indefinitely while incurring significant losses.

SECTION 3. ECONOMIC DEVELOPMENT PROGRAMS

A. ECONOMIC DEVELOPMENT

The Economic Development program (EDP) provides communities with **gap** funding to assist identified businesses in the creation/retention of jobs for low-and moderate-income persons. Please refer to Page 5 of this document for Program deadlines and due dates.

1. Eligible Activities:	<u>Maximum Award</u>
a) Grants to Municipalities for Direct Business Support: working capital and capital equipment purchase Acquisition and any type of construction is not an allowable activity.	\$100,000*

2. Exclusions:

- Applicants may apply on behalf of only one business.
- **EDP funds cannot be used to refinance existing debt.**
- All EDP activities must be in support of an identified business; speculative activities are excluded.
- Communities may **not** apply on behalf of a business that has received prior CDBG EDP funding.
- **Waivers to increase the maximum grant award amount, in instances where the impact of the project is substantial and can be documented, both through project investment and job creation, must be approved by the Director of the Office of Community Development.**

3. Project Benefit: All projects must document that at a minimum, 51% of all jobs created or retained as a result of the funded activity must be taken/held by persons of low and moderate income as defined by HUD. Jobs created/retained must be in the community applying for the EDP award, new jobs to that community and not associated with any other branches of the assisted business located in another community. Transfer positions cannot be counted toward the job creation/retention requirements. **In the event that job creation requirements are not met, the applicant community will be responsible for immediate repayment to DECD of all CDBG funds expended on the project.**

4. Program Dollars per Job: The maximum CDBG participation per job created or retained with EDP funds is \$30,000.

5. Full Time permanent Jobs: In determining CDBG National Objective compliance with jobs created or retained only **Permanent** jobs may be counted; temporary jobs may not. Full time jobs require a worker to work at least 1750 hours per year. Part time jobs require a worker to work at least 875 hours but less than 1750 hours per year. Part-time jobs **must** be converted to Full Time Equivalents (FTE). An FTE is defined as two part time jobs. **Seasonal** jobs may count only if the seasonal job lasts long enough and provides sufficient income to be considered the employee's principal occupation. (Contact OCD prior to counting seasonal jobs towards LMI benefit.) **All** permanent jobs created by the project must be counted, regardless of funding source(s). Jobs indirectly created by the project (i.e., remote location, "trickle down" jobs) do not count.

6. Program Requirements:

(a) EDP Letter of Intent Due Dates:

All communities wishing to submit an EDP application must submit a Letter of Intent. Please refer to Page 5 of this document for Program deadlines and due dates. After review for completeness and eligibility, units of general local governments may be invited to make a full application.

(b) EDP Application Due Dates: By invitation only as a result of accepted Letter of Intent. Please refer to Page 5 of this document for Program deadlines and due dates.

(c) Necessary and Appropriate: EDP assistance to a business must be for projects that are necessary and appropriate. The application must describe the need for program assistance stating why the project cannot proceed without program participation, that program funds will provide the necessary gap financing, reasonableness of the amount requested, and assurance that the assistance provided is commensurate with the community benefits that will accrue from the project.

(d) Compliance with Benefit Certification Requirements: The business and the applicant community, under the direction of the Program Manager assigned to the project, must comply with documentation requirements for jobs created/jobs retained on a project including but not limited to benefit surveys, income verification and periodic reporting that the Office of Community Development may require.

(e) EDP Projects in Support of Retail Businesses: OCD may accept an EDP application in support of a retail business activity only under the following limited conditions:

- The retail business represents the provisions of new products and services previously unavailable in the community or is a tourism-related business; and
- The development or expansion of the retail business represents a net economic gain for the community and the region. Applications supporting a retail business or businesses are required to certify that the development represents a new overall gain for the region's economy and not a shift from existing established businesses to a new or expanded one; and
- The retail business is located in either a downtown district meeting the definition in 30-A M.R.S. Section 4301 (5-A); or a designated local growth area contained in an adopted and consistent comprehensive plan; and
- At least 50% of the jobs created by the retail business must be full time jobs.

7. Selection Process: The selection process will consist of two stages. Members of the Review Team will assign a Review Point Total for each application reviewed. Review Point Totals will consist of the sum of the three scoring areas below and any applicable bonus points. The following criteria will be used:

(a) Stage 1:

Letter of Intent: All communities wishing to submit an EDP application must first submit a Letter of Intent. After review for completeness and eligibility, units of general local governments may be invited to make a full application. Please refer to Page 5 of this document for Program deadlines and due dates.

(b) Stage 2:

Application: Members of the Review Team will assess the applications based on the following criteria:

Problem Statement

Scope

- Detail the problems or needs facing the community/business to be assisted.
- Tell how these problems relate to job creation or job retention activities.
- Describe how the overall financial viability of the community/business is affected by the problems or needs.

Impact Identify how employment opportunities for persons of low/moderate income are negatively affected by the identified problems.

- Emphasize the importance of the affected business in relation to the stability of the community/region and its current financial well-being.

Need Identify reasons why the community/business is unable to finance the proposed project on its own, or with assistance from other sources.

²⁰

- Include a narrative that highlights any recent efforts by the community/business to assist job creation/retention activities.

Solution

Project Description Detail the activities that the community/business will undertake using EDP funds to resolve the problems/needs presented in the Problem Statement.

- Identify, in detail, the specific working capital uses of EDP funds.
- Explain how the solution directly solves the identified problems/needs.
- Include a firm figure of the number of jobs to be created or retained as a result of the project, and how these jobs relate to persons of low/moderate income.
- Clearly state the amount of EDP funds sought and how they will fit into the overall financing for the project.

Effect on Assisted Business

- Describe the effect the EDP award and completion of the project, as a whole, will have on the ability of the community/business to remain competitive, and create/retain quality jobs.
- Describe the market including identification of competitors, price structure, resource availability, operating/manufacturing costs, transportation costs, demand, and other factors influencing the marketability of the product or service proposed. Also identify all project risks and the extent of the risks.

Project Timeline and Feasibility

- Describe how the project is assured of successful completion within 12 months.
- Provide background information (including resumes) for the owners and/or managers of the business and specific information about the skills and experiences of the owners and/or managers as related to the successful management of the business and proposed project.
- Include a concise timetable for project implementation.

Citizen Participation

- Describe how citizen were informed of the development of this application, including how the required public hearing contributed to the process. **(Submit a public hearing record consisting of the published public hearing notice, hearing minutes, and attendance list with the original and all three copies of the application.)**
- **Business/Local Involvement** Outline other input from businesses, chambers of commerce, development organizations, local groups and individuals have had in increasing the citizen participation process for the proposed project.
Highlight how the use of any media (TV, radio, newspapers, etc.) increased public awareness and participation in the EDP project.

9. Opportunity Zone Priority will be given to each applicant community certified as an Opportunity Zone location at time of application.

10. Final Score. EDP applications will be awarded funding based on the consensus of the review team together with the analysis completed by OCD's financial underwriter.

11. Project Development Phase: The project development phase must be completed within 3 months from the date of award. The goal of this phase is a grant contract for CDBG funds. During this phase an OCD Development Program Manager will be assigned to work with the community to finalize their project. OCD reserves the right to rescind the CDBG program award of the community is not under contract within this time. The Office of Community Development may grant waivers for just cause.

B - MICRO-ENTERPRISE ASSISTANCE GRANT PROGRAM

The Micro-Enterprise Assistance Program (MEA) provides funding to non-entitlement areas statewide to address the needs of Micro businesses. This program will start **July 1, 2025** and will be administered on a regional basis throughout Maine, as stated below.

1. Special Threshold Criteria and Certifications: MEA Program funds will be distributed through a set aside of CDBG funds provided to Aroostook County as the lead community. The lead community will establish a legally binding contract with each of the participating Economic Development entities. Participation in the MEA delivery system is subject to the approval of the Director of the OCD. The MEA Program provides grant funds to micro-enterprise businesses through a partnership with Maine's Small Business Development Centers and their partners.

1. Eligible Activities: Eligible activities include grants to for-profit businesses that can be used for working capital, purchase of inventory, supplies and equipment. Maine's Small Business Development Centers will identify and pre-qualify those businesses who are eligible for the program. Potential participants will need to provide their previous years' income tax return to verify eligibility.

Cannabis related businesses are not eligible.

2. Maximum Amount of Micro-Enterprise Assistance to an individual Business:
\$10,000

3. Project Benefit / Demonstration of National Objective:

Micro-Enterprise Grant: Existing businesses that have five or fewer employees, **one of whom owns the enterprise, and whose household income is Low/Moderate as defined by HUD will meet the project benefit.** Applicants will need to submit a copy of their previous year's Personal Income Tax filing with their application. Non-owner employees' incomes are not considered in meeting project benefit.

4. Selection Process:

All Micro-Enterprise businesses wishing to submit a MEA application must meet with their local Small Business Development Center advisor to determine eligibility. SBDC advisors will review and submit complete applications to be considered for funding.

SECTION 4. TECHNICAL ASSISTANCE

The Office of Community Development will use Technical Assistance funds to: conduct workshops, produce program materials, provide training, and provide technical assistance and outreach to communities.

Regional Providers will provide planning assistance to units of general local government in identifying community & economic development needs, developing, and administering CDBG projects. For purposes of this paragraph the term "**planning assistance**" means the facilitating of skills and knowledge in planning, developing, and administering CDBG activities for entities in non-entitlement areas that may need but do not possess such skills and knowledge.

SECTION 5. REDISTRIBUTION OF GRANT FUNDS

This section describes the methods by which undistributed funds, disencumbered funds, additional funds received from HUD, and program income will be redistributed.

1. Local Government Grants from the State: Applicants receiving grants under the CDBG program but failing to have their projects substantially underway (environmental review complete, program costs obligated, construction or services begun) within six months of grant award, may have their grant rescinded by DECD.

Rescinded grant funds may be added to any open CDBG contract and can be used to make additional awards under any eligible CDBG program activity.

Unexpended funds remaining in the grantee's CDBG account at grant closeout, funds remaining in a grantee's award but not requested upon grant closeout, and funds returned to DECD because of disallowed costs may be added to any open CDBG contract and can be used to make additional awards under any eligible CDBG program activity.

2. Unallocated State Grants to Local Governments: Unallocated grant funds resulting from lack of adequate program competition or demand in any of the available 2025 CDBG programs and any additional funds allocated by HUD may be added to any open CDBG contract and can be used to make additional awards under any eligible CDBG program activity.

3. Basis for Redistribution: The decision to redistribute funds will be made after staff evaluation of the following: the total funds available, new requests for funding, requests for additional funding from current CDBG grantees and applicants for competitions that did not receive funding. The OCD may redistribute available funds to any project deemed to be in the best interest of, and that offer CDBG definable benefits to the State of Maine.

SECTION 6. PROGRAM INCOME

As used in this Proposed Statement, "Program Income" means the gross income received by a grantee from any grant-supported activity in excess of \$35,000. Applicants will refer to the CDBG Regulations and the Maine Office of Community Development policies on program income.

SECTION 7. APPEALS

Appeals of award decisions are restricted to errors of fact or procedure. Appeals in the areas of judgment qualitative scoring will not be entertained. In the case of a successful appeal, funds will be reserved for the project from available or subsequent CDBG funds.

An applicant wishing to appeal DECD's decision regarding their 2025 application restricted to errors of fact or procedure, may do so by submitting an appeal letter to the Director of the Office of Community Development within fifteen (15) days of the award announcement for that specific program.

SECTION 8. AMENDMENTS TO THE PROGRAM STATEMENT

The State may amend the 2025 Program Statement from time to time in accordance with the same procedures required for the preparation and submission of the program statement. The Department of Housing and Urban Development's citizen participation requirements will guide the amendment process.

**THIS MATERIAL IS AVAILABLE IN ALTERNATIVE FORMAT
UPON REQUEST**

BY CONTACTING:

**OFFICE OF COMMUNITY DEVELOPMENT
111 SEWALL STREET, 3RD FLOOR
59 STATE HOUSE STATION
AUGUSTA, MAINE 04333-0059
TELEPHONE (207) 624-7484
TTY: 1-800-437-1220**

**ALSO AVAILABLE ON THE OFFICE OF COMMUNITY
DEVELOPMENT WEB SITE:**

www.meocd.org

The Maine CDBG Program is Funded by:





MaineHousing
MAINE STATE HOUSING AUTHORITY

Emergency Shelter
and Housing
Assistance Program
(ESHAP)

2025 Program Guide

Contents

Program Guide	2
Overview & Purpose	2
Funding Allocation & Eligible Activities.....	2
Shelter Operations Share:.....	2
Housing Stabilization Share:	3
Performance Share:	4
Housing Voucher Rental Subsidies.....	4
Stability Through Engagement Program (STEP).....	5
Housing Choice Vouchers (HCV)	5
ESHAP Eligible Applicants.....	5
Program Performance Standards.....	7
Monitoring Compliance and Technical Assistance	7
Application	8
Application Process.....	8
Application Timeline	9
Application Selection	9
Renewal Applications.....	10
Renewal Applications with Increased Bed Capacity	10
New Applications	10
New Application Rubric.....	11
MAINEHOUSING NONDISCRIMINATION NOTICE:.....	11

Program Guide

Overview & Purpose

The mission of MaineHousing is to assist Maine people in obtaining and maintaining quality affordable housing and services suitable to their housing needs. In carrying out this mission, MaineHousing provides leadership, maximizes resources, and promotes partnerships to develop and implement sound housing policy.

MaineHousing uses funds from certain federal and state resources to give grants to agencies for a variety of activities to assist people who are experiencing homelessness or who are at risk of experiencing homelessness. MaineHousing has allocated resources to the Emergency Shelter and Housing Assistance Program (ESHAP) to be distributed according to the Funding Formula Allocation outlined in this Program Guide and the Application for ESHAP. Further information regarding ESHAP can also be found in the Homeless Solutions Rule (the “Rule”), which is available electronically at: <http://www.mainehousing.org/docs/default-source/msha-rules/19--homeless-solutions-rule.pdf>

This Program Guide and the corresponding Application outlines the process through which these funds will be distributed, the parameters of the activities that they can support, and the process to apply for funding. Capitalized terms have the same meaning as in the Rule unless context indicates otherwise.

ESHAP grantees can receive funding through the three funding components that make up the award: the Shelter Operations Share, the Housing Stabilization Share and the Performance Share. MaineHousing also allocates Rapid Re-housing and permanent rental subsidies to ESHAP Shelters through vouchers. These vouchers are: Stability Through Engagement Program/Tenant Based Rental Assistance (STEP/TBRA) Vouchers and Home to Stay/Housing Choice Vouchers (HTS/HCV). Each of these vouchers have Administrative Plans which detail their usage and are available electronically at <https://www.mainehousing.org/docs/default-source/rental/2023-hcv-administrative-plan.pdf> and <https://www.mainehousing.org/docs/default-source/homeless/homeless-initiatives/step/step-resources/2023-step-administrative-plan.pdf>

All ESHAP funds must be targeted to individuals and families that meet the definition of homeless outlined in 24 C.F.R. § 576.2. MaineHousing has designed ESHAP and tailored its monitoring of ESHAP to ensure its grantees are in compliance with all listed funding sources. Housing vouchers and subsidies are always subject to the availability of funds.

MaineHousing has also made Supportive Housing and Emergency Shelter Repair Program Funds available to current ESHAP grantees in good standing. The purpose of this funding is to assist Emergency Shelters in addressing physical plant deficiencies and/or issues in need of correction. Application to this funding must be made separately and details are available at <https://www.mainehousing.org/programs-services/housing-development/developmentdetails/supportive-housing-emergency-shelter-repair-program>

Funding Allocation & Eligible Activities

ESHAP funds will be distributed as follows:

Shelter Operations Share:

An amount equal to 45% of the Funding Formula Allocation will be disbursed among Emergency Shelters, such that each Emergency Shelter will receive a percentage equal to its Bed Capacity divided by a number equal to the total Bed Capacity available statewide for the calendar year. MaineHousing will review the number of beds reported, along with occupancy data to ensure that bed utilization is commensurate with

community need. If a persistent discrepancy is observed, MaineHousing, at its sole discretion, reserves the right to reduce the number of funded beds.

Eligible Activities: The costs of maintenance (including minor or routine repairs), rent, security, fuel, equipment, insurance, utilities, food, furnishings, supplies and staff necessary for the operation of the Emergency Shelter.

Disbursement: Quarterly

Housing Stabilization Share:

An amount equal to 45% of the Funding Formula Allocation will be disbursed among eligible agencies, such that each agency providing staffing for Rapid Re-housing, Housing First and Housing Stabilization services operated by the agency will be eligible to receive a percentage equal to the agency's total number of Clients Assessed and Stabilized, divided by the total number of Clients Assessed and Stabilized statewide. The number of Clients Assessed and Stabilized will be based upon the most recent four quarters of data available to MaineHousing at the start of the grant year.

New Grantees: If an agency or program has not received ESHAP funds for the full four quarters prior to the grant period starting, MaineHousing will utilize the available data for that program to extrapolate a full four quarters. That extrapolated data will be used to determine the Stabilization share for that program.

Eligible Activities: Navigator staffing, including at least one staff designated and trained as the Primary Navigator for your agency. The Primary Navigator should attend, or complete e-learning training, specific to navigator services. This person will be the primary point of contact regarding Navigator services for the ESHAP grantee. The Primary Navigator will coordinate messaging from MaineHousing staff to the rest of their agency in regards to navigator services and program delivery requirements.

Additional Criteria: Although each agency will have a Primary Navigator, other staff within the agency may provide navigator services to eligible households that can be reimbursable through the Housing Stabilization Share. Navigator services must be provided for by the agency receiving the funds. Eligible households must meet the criteria under paragraph (1) of the “homeless” definition in 24 C.F.R. § 576.2 or under paragraph (4) of the “homeless” definition and live in an emergency shelter or other place described in paragraph (1) of the “homeless” definition. Navigator services must include assessment with housing prioritization tools, 30 day check-ins and Housing Stability Plans, as well as housing navigation and stabilization services.

Disbursement: Quarterly

Assessments

Clients may be assessed using the common assessment tools which are designated by MaineHousing and the Maine Continuum of Care. Clients whose assessment results deem them ineligible for Navigator Services should not be enrolled, while clients with eligible assessment results will be entered into the agency’s Navigator Services program. Documentation of enrollment or non-enrollment should be retained in the client file. Detailed information about the common assessment tools and appropriate housing interventions are provided in the Navigator Services Guide found under the ESHAP heading at <https://mainehousing.org/partners/partner-type/homeless-service-providers/homeless-initiatives>.

Monthly Check-Ins and Housing Stability Plans

Every client enrolled in ESHAP services must have a Housing Stability Plan based on the needs found in the common assessments. The Housing Stability Plan should be updated during at 30 day check-in to assess the progress and address any additional needs. A new Housing Stability Plan should be created every 90 days.

Housing Navigation and Stabilization

Clients should be given Housing Navigation services after their enrollment in Navigator Services. The Navigators should apply for appropriate subsidies and housing based on the assessment result recommendations for the client. All documentation of housing work including housing applications, mainstream and housing referrals, documentation applications, leases, etc. should be kept in the client's file to show on-going navigation efforts. Evidence that the RentSmart curriculum is being offered must be present either in client files or posted in agency facilities. After the client is housed, on-going Housing Stabilization services are expected to continue for no less than one year. Clients who are not receiving subsidy through a STEP or Home to Stay voucher have the option to opt out of Housing Stabilization services; any decision to opt out must be noted in the client file.

Ending Services

The manner and date of a client's exit from programs must in all cases be documented in the client file, and HMIS or comparable database.

If a client is terminated from the program, the client should be provided with a letter clearly stating the reason for the termination and the process to appeal the decision. A copy of the termination letter and any other appeal documentation must be included in the client file. Shelter Operations and Navigator Services are considered separate activities, and any termination from either must be documented, regardless of the client's status with another activity.

Protections under VAWA: Sub-recipients are exempt from service and stability plan requirements if the Violence Against Women Act of 1994 (42 U.S.C. 13701 et seq.) or the Family Violence Prevention and Services Act (42 U.S.C. 10401 et seq.) prohibits that recipient or sub-recipient from making its shelter or housing conditional on the participant's acceptance of services.

Disbursement: Quarterly

Performance Share:

An amount equal to 10% of the Funding Formula Allocation will be allocated among eligible applicants that in the previous 6 months maintained or increased their data quality for the following data points: Date of Birth, Race, Veteran Status, Destination, Relationship to Head of Household, and Client Location. In January and July of each year, Maine HMIS will report to each eligible applicant their error rate for each of those data points. Victim Service Providers will report from their comparable database. At the conclusion of the six month period, any eligible applicant whose data error rate is equal to or less than it was at the beginning of the period, will be eligible for a portion of Performance Share funds equal to the percentage of the number of Clients Assessed and Stabilized by the eligible applicant, divided by the number of Clients Assessed and Stabilized by all eligible applicants. The HMIS team at MaineHousing will provide instructions for running and submitting the ESHAP Data Quality report at the time reporting is due.

Eligible Activities: Any purpose consistent with the providers' mission and not otherwise prohibited by state or federal regulations or laws.

Disbursement: The Performance Share is awarded semi-annually with the Operations and Stabilization disbursements. The share is based on performance in January 1- June 30, and July 1 to December 31. The data utilized is from the six-month period that just concluded.

Housing Voucher Rental Subsidies

Staff providing Navigator services will additionally have access to a set aside of Stability Through Engagement Program Vouchers (STEP) and Home To Stay Housing Choice Vouchers (HTS HCV) rental subsidies as resources remain available. Please refer to the Navigator Services Process Guide available

electronically at <http://mainehousing.org/partners/partner-type/homeless-service-providers/homeless-initiatives> for detailed information regarding expectations and processes for the Navigator role, which is integral to utilizing the voucher resources.

Stability Through Engagement Program (STEP)

STEP guidelines, funding sources, and governing regulations are detailed in the STEP Administrative Plan located at <https://www.mainehousing.org/docs/default-source/homeless/homeless-initiatives/step/step-resources/2023-step-administrative-plan.pdf> Providers may access STEP only to the extent that the resources remain available. Grantees will use the funds for rental assistance, utility deposits and security deposits to rapidly re-house families and individuals experiencing homelessness. STEP vouchers may be accessed by ESHAP providers through their Hub's Coordinated Entry process.

Housing Choice Vouchers (HCV)

Home to Stay Housing Choice Vouchers (HTS HCV) will be administered according to federal regulations and MaineHousing policies detailed in the current Administrative Plan for Section 8 Housing Choice Voucher and Project Based Voucher Programs.

MaineHousing makes the final decision on program eligibility, which requires a determination that the current or past behavior of household members does not include activities which are prohibited by HUD or MaineHousing. Upon admission, each family will be required to pay between 30% to 40% of their adjusted total household income for rent in accordance with the individual voucher's administrative plans. All subsidies are only available as funding permits.

Depending upon availability of vouchers, each participating program is allowed up to four households to be searching for housing at any given time. When a program has four households searching, they must wait until one of those households leases up, relinquishes their voucher, or the voucher expires prior to submitting a new application.

ESHAP Eligible Applicants

To be eligible to receive ESHAP funds, an Applicant must:

- be a non-profit corporation in good standing in the State of Maine qualified for tax exemption under 501(c)(3) of the Internal Revenue Code or a municipal corporation;
- be eligible in accordance with the HEARTH Act;
- be a provider of homeless services with at least one (1) year of experience providing emergency housing, street outreach, Homeless Prevention, or Rapid Re-housing activities;
- be a regular and active participant in the Maine Continuum of Care, in accordance with its governance charter and performance criteria;
- be a regular and active participant in their local Homeless Service Hub by participating in Hub meetings and providing relevant data to the Hubs for the generation of a by-name list of Persons Experiencing Homelessness;
- have board and or advisory board representation from Persons Experiencing Homelessness or formerly experiencing homelessness who are involved in policy or planning of the organization;
- participate in Coordinated Entry Process by acting as an access point to the Coordinated Entry Process, administering the common assessment tools, placing eligible participants on the housing prioritization list, participating in case conferencing meetings, and completing housing referrals utilizing the process and procedures designated by the Maine Continuum of Care;
- have the administrative and financial management capacity necessary to administer and to account for the use of the applicable grant in accordance with the funding requirements;

- operate in accordance with the homelessness strategy outlined in the Maine Consolidated Plan;
- meet the objectives of the Program under which they are applying as set forth in the applicable Program Guide;
- participate in and meet the performance and reporting requirements of the Homeless Management Information System (HMIS) or a comparable database if the Applicant is a Victim Service Provider;
- not engage in any explicitly religious activities, such as worship, religious instruction, or proselytization, as part of the activities and services funded with any grant for activities or services covered by the Rule; and if religious activities are offered, they must be offered at a separate time or location from the activities and services covered by the Rule; and participation in those religious activities must be voluntary for persons receiving assistance with funds covered by the Rule;
- operate its programs free from discrimination on the basis of age, sex, race, color, religion, national origin, ancestry, physical or mental disability, sexual orientation, or gender identity or expression, marital status, familial status, or receipt of public assistance in accordance with applicable federal and state fair housing laws;
- comply with Section 504 of the Rehabilitation Act of 1973, which prohibits disability discrimination in programs that receive HUD funds; and
- comply with MaineHousing requirements.

To be eligible to receive Shelter Operations Share Funds, an Applicant must also:

- provide access 365 days per year to assist Persons Experiencing Homelessness meet basic emergency shelter needs. If the shelter must close or reduce Bed Capacity for any reason, grantees must immediately inform MaineHousing's Director of Homeless Initiatives in writing;
- provide adequate sleeping space or beds, and clean and functioning shower and toilet facilities;
- provide safe and nutritious food, including breakfast or access to breakfast and, if open 24 hours, also provide lunch and dinner or access to lunch and dinner;
- treat all guests with dignity and respect, regardless of religious or political beliefs, cultural background, disability, gender identity or sexual orientation;
- provide shelter and housing services based upon a Rapid Re-housing approach;
- have admittance and stay policies that are appropriate for the population served and do not create unnecessary barriers to guests entering and staying;
- provide linkages and access to community resources such as health care, job readiness and employment services, Mainstream Resources, and educational services to assist guests in achieving housing stability;
- assess guests for program eligibility and services to enable mobility to permanent housing with adequate supports;
- inform guests of their rights and responsibilities, including specific shelter policies and house rules;
- accept eligible persons regardless of their ability to pay or their eligibility for reimbursement or actual reimbursements from any third party source, including local, municipal, state, or federal funding sources;
- have no lease requirements for guests;
- if serving families with children, provide space other than open dormitory style and do not require involuntary family separation for admission;
- provide separate accommodations for male, female, and non-binary consumers consistent with their gender identity;
- protect the privacy and confidentiality of guests and their personal information;

- provide training, policies, procedures and regular maintenance to encourage, improve, and maintain the health and safety of guests, volunteers and staff;
- post fire, disaster, and other emergency procedures in a conspicuous place and review the procedures with each guest;
- maintain a daily and confidential census of shelter clients including precise sleeping locations;
- operate in compliance with all applicable federal, state and local codes, laws and regulations; and
- have written policies and procedures for standards that address the following areas: non-discrimination, client grievance and appeal of termination, approval of financial transactions, record retention, procurement, whistleblowers, access to shelter and services, client rights and responsibilities, program personnel and facility operations, health and safety, food preparation and distribution, electronic data and security, Fair Housing, and Drug Free Workplace. All policies must meet federal guidelines.

Program Performance Standards

In addition to the data quality performance measure, MaineHousing will utilize additional performance metrics to gauge the effectiveness of each grantee, as well as ESHAP as a whole.

Length of time to housing- MaineHousing will review the number of days between program entry and entry into housing. The 2025 benchmark for low barrier shelters is less than or equal to 185 days. The 2025 benchmark for non-low barrier shelters is less than or equal to 145 days.

Exits to Permanent Housing- MaineHousing will review the percentage of each grantee's participants that exit their programs into permanent housing over the course of the year. The 2025 benchmark for low barrier shelters is greater than or equal to 21%; the 2025 benchmark for non-low barrier shelters is greater than or equal to 50%.

Returns to Homelessness- MaineHousing will review the percentage of each grantee's participants, who after having exited to a permanent housing destination, subsequently return to homelessness within six months of that exit. The benchmark for low barrier shelters is less than or equal to 5%; the benchmark for non-low barrier shelters is less than or equal to 5%.

Performance benchmarks are set based on currently available data. Should MaineHousing observe significant changes in overall data trends, these benchmarks may be adjusted accordingly. Should individual grantees fall significantly and/or consistently short of these metrics, MaineHousing will follow the compliance and technical assistance process outlined in the section below.

Monitoring Compliance and Technical Assistance

MaineHousing will review for program compliance based on assessment of risk or at least every three years at reasonable times and may copy and examine all of a grantee's records other than medical or other confidential client information protected by privacy laws except as required by the federal award pursuant to 2 C.F.R. §200.336. MaineHousing will determine the frequency and level of monitoring conducted based on a risk assessment that evaluates each Grantee's potential risk to the overall grant. Grantees will maintain records sufficient to meet monitoring and auditing requirements of MaineHousing and HUD including, without limitation, daily rosters and client files. Grantees will adhere to uniform administrative requirements as outlined in the code of federal regulations 2 C.F.R. §200, and retain program records for no less than 7 years after participation ends. Grantees will maintain timesheets for staff salaries being charged to ESHAP that specify the amount of time spent on ESHAP activities. MaineHousing will inspect the shelter physical plant for compliance with 24 C.F.R. §576.403 (b) and other MaineHousing requirements. MaineHousing staff will provide grantees with training, technical assistance, monitoring and oversight to ensure program integrity.

Funding is subject to a grantee's compliance with this Program Guide, a Grant Agreement with MaineHousing, and with all applicable federal, state and local laws and ordinances as may be amended from time to time including, without limitation, the Rule, the Maine Housing Authorities Act, 30-A M.R.S., §4701, et. seq., as amended: and the McKinney-Vento Act, as amended by the HEARTH Act.

MaineHousing will review the performance of each grantee in carrying out its responsibilities based on assessment of risk or at least every three years and as otherwise determined by MaineHousing. In conducting performance reviews, MaineHousing will rely primarily on information obtained from the records and reports from grantees, as well as information from monitoring reviews, audit reports, and HMIS or comparable data bases. If MaineHousing determines that a grantee has not complied with a program requirement, MaineHousing will give the grantee notice of this determination. MaineHousing will offer technical assistance and give the grantee an opportunity to demonstrate, within the time prescribed by MaineHousing, that grantee has complied with program requirements. If the grantee fails to demonstrate to MaineHousing's satisfaction that the activities were carried out in compliance with program requirements, MaineHousing may take one or more of the following actions:

- provide additional technical assistance and training opportunities;
- instruct the grantee to submit and comply with proposals for action to correct, mitigate, and prevent noncompliance with program requirements;
- suspend disbursement of funds for some or all activities;
- reduce or terminate the remaining grant and reallocate those funds to other grantees;
- disqualify grantee from participation in the Performance Share or future ESHAP; and
- require grantee to repay grant funds.

Application

Application Process

The Applications are due no later **than Monday, November 20, 2024 by 5pm**. If you have questions as you prepare your Application, please e-mail SHLTAPP@mainehousing.org.

Applications may be completed and submitted through our grant management platform, Amplifund. The 2025 Application can be found at <https://www.gotomygrants.com/Public/Opportunities/Details/7404718a-6b95-4915-98e1-7d6ae63cf7ee>

A training video on how to utilize the Amplifund portal on the Homeless Initiatives Launch Pad, under the Training tab; <https://www.mainehousing.org/partners/partner-type/homeless-service-providers/homeless-initiatives>.

Applications submitted in any other format will not be reviewed. Please note that the documents submitted with your ESHAP Application are used for the purpose of monitoring your shelter's compliance with ESHAP.

Applications that, in MaineHousing's sole judgment, are incomplete and/or missing required documents will not be eligible for consideration. For an application to be considered complete, it must contain the following and be uploaded to your ShareFile Folder;

1. Complete answers in ESHAP, Data Security, and Shelter Operations (if applicable) sections ;
2. a completed Emergency Shelter Minimum Threshold Requirements review (see below);
3. the following attachments uploaded and with electronic signatures;
 - Attachment A: Certificate Regarding Lobbying;

- Attachment B: Homeless Experience Consumer Participation Certification;
- Attachment C: Minimum Data Requirements Certification;
- Attachment D: Applicant Conflict of Interest Disclosure and Acknowledgement Form;
- Attachment E: Certificate of Local Approval for Nonprofit Organizations;
- Attachment F: Homeless Initiatives Contact Form;
- Attachment G: Documentation of 501(c)(3) Status;
- Attachment H: Most recent audit within the last 12 months completed by an outside firm and accompanying management letter. (A133 or comparable);
- Attachment I: Corporate Resolution from Board of Directors to approve application submission;
- Attachment J: An organizational chart showing titles and lines of authority for all individuals with any role in approving or recording of financial transactions;
- Attachment K: List of agency board of directors outlining who each member represents and;
- Attachment L: Agency general Release of Information;

4. all listed policies and procedures.

MaineHousing will use the following process to determine which applicants are eligible for funding:

MaineHousing staff will review each application to ensure that it is complete, including the submission of the required attachments. Only complete applications, which have included all required attachments, will be considered. Staff will determine if the application meets minimum threshold requirements.

Applicants who are eligible for funding will be issued a Grant Agreement specifying terms and conditions of the funding award. Once successful applicants receive this notification they will be expected to submit:

1. a signed HMIS Agency Participation Agreement if you are a new ESHAP recipient for the 2025 program year;
2. a certification of Local Approval verifying that the municipality in which the program will run will not be seeking any funds from the Emergency Solutions Grant program to perform similar activities.

A Grant Agreement will not be fully executed until all certification and any other documents that may be required by MaineHousing have been received. Applicants who do not meet threshold requirements will be notified in writing.

Application Timeline

Task	Date
Complete Application in Amplifund by 5PM	November 20, 2024
Award Notifications sent to grantees	December 13, 2024
Executed Grant Agreement	December 27, 2024
Grant Year	January 1, 2025- December 31, 2025

Application Selection

Following the application submission deadline, MaineHousing will separate applications from previous ESHAP providers (“Renewal Applications”) and new applications (“New Applications”) and consider selection using the processes detailed below.

Renewal Applications

Renewal Applications will be considered based on the Risk Assessment scores from the Applicant's most recent annual monitoring. Each year MaineHousing conducts a Risk Assessment on ESHAP providers which determines each project's overall potential risk to the overall Emergency Solutions Grant, of which MaineHousing is the Recipient, and Applicants are subrecipients. The Risk Assessment scores ESHAP providers on a 0-100 scale, with 0-30 being considered Low Risk, 31-50 Medium Risk, and 51-100 considered High Risk based on a number of factors outlined in the MaineHousing ESHAP Monitoring Tool, which can be reviewed here- <https://www.mainehousing.org/docs/default-source/homeless/homeless-initiatives/monitoring/blank-monitoring-tool.xlsx>.

All Applicants with a Low or Medium Risk score in the most recent monitoring year will be approved for renewal. Applicants with a High Risk score from the most recent monitoring year, but a Low or Medium Risk score in previous years, will also be approved for renewal. MaineHousing may attach conditions to the approval of Applicants with a High Risk score, which may be determined on a case-by-case basis.

Applicants with a High Risk score from the two most recent monitoring years will be referred to a Renewal Review Committee ("RR Committee"). The RR Committee will consist of MaineHousing's Director of Homeless Initiatives, Senior Director of Homeless Initiatives, and Senior Director of Finance and Lending. The RR Committee will review the previous monitoring results along with the current application. The RR Committee will consider the potential gap in services that would occur if the application is refused, as well as any progress the Applicant has made to correct deficiencies since the latest Risk Assessment was completed. The RR Committee will issue a decision on whether or not to accept or reject the Renewal Application, and what conditions may be placed on an acceptance, within seven (7) days of referral.

If an Applicant wishes to appeal a rejected Renewal Application, they must submit a written request for appeal within seven (7) days of the rejection being issued. At that time, the appeal will be considered by the Director of MaineHousing. The decision of the Director will be issued within five (5) business days of the appeal being submitted, and that decision will be final.

Renewal Applications with Increased Bed Capacity

Renewal Applications that propose to increase the number of funded beds in their shelter will have their existing bed capacity approved using the Renewal Application process above. New beds will be considered using the New Application process below, but the RR Committee will only use criterion 4 of the New Application Rubric, outlined below.

New Applications

In the case of New Applications, MaineHousing will first determine if the Applicant is eligible under the provisions in the Homeless Solutions Rule. If the Applicant is deemed eligible for ESHAP, MaineHousing will convene an Application Review Committee ("AR Committee"). The AR Committee will consist of representatives from MaineHousing and relevant partner agencies, the Hub Coordinators for the applicable Hubs, and one of the Maine Continuum of Care chairs. If possible, partner agencies in the geographical vicinity of the Applicant will be included on the AR Committee.

The AR Committee will consider the approval of all New Applications based on the need for services in the area of the Applicant, using the New Application Rubric, outlined below. New Applications will be approved if the Applicant will serve an area not otherwise served, or a population not served within their area of

operations. The AR Committee will also consider the impact to the overall funding when deciding which New Applications to approve.

MaineHousing will inform new Applicants of the AR Committee’s decision within one (1) business day of the AR Committee’s review. In the case of Applicants whose applications are not accepted, the Applicant may appeal this decision within five (5) business days of receipt of the AR Committee’s decision. The Senior Director of Homeless Initiatives, Senior Director of Finance and Lending and the Director of MaineHousing will consider any appeals and render a decision within five (5) business days of the appeal being lodged, and that appeal will be final.

New Application Rubric

Criteria	Answer	Result
1- Are there any other ESHAP providers in the Applicant’s Hub?	No	Application is approved
	Yes	Move to Criteria 2
2- Do the existing ESHAP providers already target the proposed Applicant’s intended demographic? (Adult, Family, Youth, DV)	No	Application is approved
	Yes	Move to Criteria 3
3- For Hubs with multiple counties, are existing providers in same county as the Applicant? -OR- For Hubs with a single county, are existing providers less than 30 minute normal driving distance away?	No	Application is approved
	Yes	Move to Criteria 4
4- If all other criteria are ‘Yes,’ can the Applicant provide verifiable data that shows an unmet need in their catchment area? (records of services provided to people experiencing homelessness not being otherwise served; turn away data from existing providers)	No	Application is denied
	Yes	Application is approved

MAINEHOUSING NONDISCRIMINATION NOTICE:

MaineHousing does not discriminate on the basis of race, color, religion, sex, sexual orientation, gender identity or expression, marital status, national origin, ancestry, physical or mental disability, age, familial status or receipt of public assistance in the admission or access to or treatment in its programs and activities. In employment, MaineHousing does not discriminate on the basis of race, color, religion, sex, sexual orientation, gender identity or expression, national origin, ancestry, age, physical or mental disability or genetic information. MaineHousing will provide appropriate communication auxiliary aids and services upon sufficient notice. MaineHousing will also provide this document in alternative formats upon sufficient notice. MaineHousing has designated the following person responsible for coordinating compliance with applicable federal and state nondiscrimination requirements and addressing grievances: Lauren Bustard, Maine State Housing Authority, 26 Edison Dr, Augusta, Maine 04330-6046, Telephone Number 1-800-452-4668 (voice in state only), (207) 626-4600 (voice) or Maine Relay 711.

MAINEHOUSING

Emergency Solutions Grant (ESG) Written Standards

Contents

About This Document	2
Background	3
Eligible ESG Activities	3
Emergency Shelter Operations.....	3
Rapid Re-Housing Stabilization Services.....	4
ESHAP Funding Requirements	5
Data Collection and Reporting Requirements.....	5
Coordinated Entry Requirements	6
Conflict of Interest	6
Additional ESG Funding Allocations	7

About this document

MaineHousing is awarded Emergency Solutions Grant (ESG) funds annually from the Department of Housing and Urban Development (HUD). HUD requires that ESG recipients establish Written Standards describing how these funds will be used, including how they are allocated to ESG sub-recipients. MaineHousing allocates ESG and other funds through Emergency Shelter and Housing Assistance Program (ESHAP) Grants to qualifying agencies throughout the state of Maine to assist persons experiencing homelessness. Chapter 19 of the MaineHousing Rules, the Maine Homeless Solutions Rule, developed in conjunction with the Maine Continuum of Care (MCOC) and the Maine Statewide Homeless Council (SHC), governs how MaineHousing allocates ESG funds and other available resources to qualifying ESHAP grantees. These Written Standards apply specifically to the ESG funding that is part of ESHAP. Regulations that govern other ESHAP funding sources are covered in other documents.

MaineHousing strives to ensure compliance with HUD and Maine Homeless Solutions Rule requirements while also giving providers the autonomy they need to craft policies and procedures that work best for their shelters, their programs, and the populations they serve. Several documents, reviewed annually, are available to help guide ESHAP Grantees. These documents are mentioned frequently throughout the ESG Written Standards and are incorporated by reference as part of this document. They contain important details that clarify or expand upon the information provided here and ESHAP grantees are expected to be familiar with them.

1. [Maine Homeless Solutions Rule](#)
2. [ESHAP Program Guide and Application](#)
3. [ESHAP Shelter Monitoring Tool](#)
4. [HMIS Governance Document](#)
5. [HMIS Policies and Procedures Manual](#)
6. [Maine Coordinated Entry Policies and Procedures](#)

These ESG Written Standards and aforementioned documents are intended to provide guidance to ESHAP grantees regarding the minimum expectations for compliance for ESG funding. As ESG sub-recipients, ESHAP Grantees may set standards on their provision of assistance that exceed these minimum standards, but must at the very least comply with HUD regulations and with the guidelines in this document. If an ESG sub-recipient establishes their own standards in addition to the ones outlined here, these must be described in the sub-recipient's Policies and Procedures Manual to be reviewed by MaineHousing annually as part of the ESG application and monitoring processes. Additional details about ESG program requirements can be found at hudexchange.info/esg and in the Code of Federal Regulations, [CFR-title-24-part576](#). ESG Sub-recipients should be sure to read, understand, and follow HUD guidance when developing their own written standards.

Background

The [Homeless Emergency Assistance and Rapid Transition to Housing Act of 2009 \(HEARTH Act\)](#) amended the McKinney-Vento Homeless Assistance Act and revised the Emergency Shelter Grants Program, renaming it the Emergency Solutions Grants (ESG) program. HUD administers ESG as a formula grant program, meaning each jurisdiction is allocated a specific calculated dollar amount, as opposed to a competitive grant where applications are scored and ranked to determine funding. Eligible ESG recipients are states, metropolitan cities, urban counties and territories, which must apply through their jurisdiction's Consolidated Planning process. MaineHousing is the ESG Recipient for the State of Maine, and distributes ESG funding and other resources to qualifying sub-recipients annually through Emergency Shelter and Housing Assistance Program (ESHAP) Grants. The City of Portland, Maine, also receives ESG funding directly from HUD as a separate Consolidated Plan jurisdiction. These Written Standards apply only to ESG funds that are distributed through MaineHousing ESHAP Grants, including ESHAP Grants to the City of Portland, but not to those ESG funds the City of Portland, or any other jurisdiction, receives directly from HUD.

ESG Eligible Activities

HUD allows ESG funding to be used for activities related to providing street outreach, emergency shelter, homelessness prevention, rapid re-housing assistance, and HMIS, as well as administrative activities. However, ESHAP intentionally focuses the use of ESG funds distributed by MaineHousing to specific Emergency Shelter Operation and Rapid Re-Housing Stabilization Service activities. This is done to maximize the impact of these limited funds and to avoid duplication of efforts. For example, Maine DHHS provides Outreach through their [Projects for Assistance in Transition from Homelessness \(PATH\)](#) program, and MaineHousing provides Rapid Re-Housing Rental Assistance through the [Stability Through Engagement Program \(STEP\)](#) and funding for significant shelter repairs through the [Supportive Housing Repair Program](#).

MaineHousing distributes all ESG funds, except those used for allowable administrative costs, to eligible sub-recipients who are local government and/or private nonprofit organizations in the state of Maine who serve individuals and families experiencing homelessness. MaineHousing allocates ESG funds through the ESHAP Application process, and works with the Maine Continuum of Care (MCOC) and the Maine Statewide Homeless Council (SHC) in determining how to apportion these funds annually. MaineHousing also provides match funding for the ESG award with cash and/or noncash contributions in accordance with HUD ESG requirements.

Emergency Shelter Operations

Eligible Activities: As detailed in the ESHAP Program Guide, qualifying Homeless Service Provider Agencies may use this portion of funding for costs related to the general maintenance and operation of an Emergency Shelter facility, such as rent, minor repairs, security, fuel, equipment, insurance, and utilities. This portion may also be used for costs more directly related to the individuals and families being served, such as food, furnishings, personal hygiene items, and other necessary supplies. This can also include the cost of a hotel or motel voucher where or when no other appropriate emergency shelter option is available for a qualifying family or individual.

Eligible program participants: Any individual or family meeting the definition of “homeless” under 24 CFR 576.2 is potentially eligible to benefit, directly or indirectly, from the activities described above. However, individual agencies and/or shelters may limit their services to particular sub-populations such as Youth, Families, or Victims of Domestic Violence, and may refer individuals or families who do not meet such criteria to other appropriate emergency shelter options. Any such limitations must be detailed by the agency in their program specific Written Standards/Policies and Procedures Manual, and must comply with all applicable HUD and Fair Housing regulations.

Rapid Re-Housing Stabilization Services

Eligible Activities: As detailed in the ESHAP Program Guide, qualifying Homeless Service Provider Agencies may use this portion of funding for costs related to housing search and placement, housing stability case management, landlord-tenant mediation, tenant legal services, and credit repair services, as necessary to help homeless individuals or families living in shelters or in places not meant for human habitation to move as quickly as possible into permanent housing and achieve stability.

Eligible program participants: Individuals and families who meet the criteria under paragraph (1) of the “homeless” definition in 24 CFR 576.2 or who meet the criteria under paragraph (4) of the “homeless” definition and live in an emergency shelter or other place described in paragraph (1) of the “homeless” definition, and meet other eligibility criteria outlined in the ESHAP Program Guide. In addition, participants must be assessed with housing prioritization tools prior to receiving housing relocation and stabilization services. Eligibility for housing relocation and stabilization services must be verified and documented by the sub-recipient.

Standards for Providing Rapid-Housing Stabilization Services: While providing housing stabilization and relocation services, the sub-recipient must meet with the participant not less than once per month and develop a plan for housing stability with the participant. The plan for housing stability must be updated every 90 days during the time that the participant is receiving services. Participants may not receive more than 24 months of housing relocation and stabilization services after placement in permanent housing. Sub-recipients are exempt from service and stability plan requirements if the Violence Against Women Act of 1994 (42 U.S.C. 13701 et seq.) or the Family Violence Prevention and Services Act (42 U.S.C. 10401 et seq.) prohibits that recipient or sub-recipient from making its shelter or housing conditional on the participant's acceptance of services.

ESG Sub-Recipient Policies & Procedures

As ESG Sub-recipients, all ESHAP grantees must establish and consistently apply Written Standards in the form of agency/program specific Policies and Procedures for providing assistance covered by ESG funding. Agencies must ensure that their Policies and Procedures Manual is consistent with MaineHousing ESG Written Standards, ESHAP Program Guide, and HUD regulations regarding the use of these funds. In addition to policies and procedures contained in these Written Standards, ESHAP Program Guide, and the Maine Homeless Solutions Rule, sub-recipients are required to have the following::

- Standard policies and procedures for evaluating individuals' and families' eligibility for assistance under Emergency Solutions Grant (ESG);
 - Above policies must include process for documenting the homeless status of each individual and family, as detailed in 24CFR§576.500(b). Sub-recipients must establish the order of priority for documenting homeless status as third-party documentation first, intake worker observations second, and certification from the person seeking assistance third;
- Policies and procedures for admission, diversion, referral, and discharge by emergency shelters assisted under ESG, including standards regarding length of stay, if any, and safeguards to meet the safety and shelter needs of special populations, e.g., victims of domestic violence, dating violence, sexual assault, and stalking; and individuals and families who have the highest barriers to housing and are likely to be homeless the longest; Code of Federal Regulations / Title 24 - Housing and Urban Development / Vol. 3 / 2018-04-01202
- Policies and procedures for assessing, prioritizing, and reassessing individuals' and families' needs for essential services related to emergency shelter;
- Policies and procedures for coordination among emergency shelter providers, essential services providers, homelessness prevention, and rapid re-housing assistance providers; other homeless assistance providers; and mainstream service and housing providers (see § 576.400(b) and (c) for a list of programs with which ESG-funded activities must be coordinated and integrated to the maximum extent practicable);
- All sub-recipient policies must be nondiscriminatory and adhere to applicable fair housing laws.

ESHAP Funding Requirements

In addition to the Policies and Procedures requirements above, all ESG sub-recipients must meet the eligibility requirements outlined in the Maine Homeless Solutions Rule and the ESHAP Program Guide prior to receiving funding. All programs funded as Emergency Shelters must meet all Emergency Shelter requirements in the Homeless Solutions Rule and the ESHAP Program Guide.

Data Collection and Reporting Requirements

In order to receive funding, ESHAP grantees must adhere to the data collection requirements outlined in the Maine Homeless Solutions Rule and the ESHAP Program Guide. In addition, ESG sub-recipients must be in compliance with the Maine HMIS Policies and Procedures Manual and HMIS Governance Document.

Each ESHAP grantee must provide program and client data to centralized data collection systems in the forms and within the timeframes required and prescribed by MaineHousing, as HMIS Lead, and in accordance with the HMIS Governance Document and Policies & Procedures Manual.

ESHAP grantee data and reports will not be considered submitted unless MaineHousing determines that the data and report is sufficiently complete and all client data is valid. Incomplete or missing data or reports may impact ESHAP funding distribution.

Coordinated Entry Requirements

ESG sub-recipients must use the centralized or coordinated assessment system (referred to as “Coordinated Entry”) established by the Continuum of Care. Coordinated Entry is an approach to coordination and management of a crisis response system’s resources to efficiently and effectively connect people to interventions that will rapidly end their homelessness. Coordinated Entry processes are intended to help communities prioritize people who are most in need of assistance. They also provide information to CoCs and other stakeholders about service needs and gaps to help communities strategically allocate their current resources. ESG sub-recipients who are Victim service providers must also utilize a Coordinated Entry System, but may choose to use a comparable, parallel system specific to DV providers if they do not wish to use the Continuum of Care's general centralized or coordinated assessment system.

Monitoring and Assessment Expectations

MaineHousing will monitor all ESHAP grantee programs for compliance at least every three years. Grantees will be notified at least 30 days prior to any monitoring visits or desk audits. MaineHousing will utilize a risk assessment to determine if grantees will be monitored more frequently than the minimum three year interval.

Grantees will maintain records sufficient to meet monitoring and auditing requirements of MaineHousing and HUD including without limitation, financial records, nightly bed rosters, policies and procedures, and client files. Shelters will be required to provide supporting documentation for fiscal compliance monitoring in reference to expenses incurred during the program year as well as documentation demonstrating compliance with state and federal requirements. Financial records must specifically show ESG Allocations and ESG Expenses to demonstrate the funds are used only for eligible activities. MaineHousing may copy and examine all of a grantee’s records for Monitoring purposes other than medical or other confidential client information protected by privacy laws.

In the case of a physical shelter program facility, MaineHousing will inspect for compliance with HUD’s minimum emergency shelter standards pursuant to and MaineHousing Asset Management inspection standards to ensure facilities meet basic health, safety, and structural guidelines.

Conflict of Interest

ESG sub-recipients must provide a conflict of interest statement with their annual application. Conflicts of interest include, but are not limited to, the following examples:

(a) Organizational conflicts of interest: The provision of any type or amount of ESG assistance may not be conditioned on an individual's or family's acceptance or occupancy of emergency shelter or housing owned by the recipient, the sub-recipient, or a parent or subsidiary of the sub-recipient. No sub-recipient may, with respect to individuals or families occupying housing owned by the sub-recipient, or any parent or subsidiary of the sub-recipient, carry out the initial evaluation required under § 576.401 or administer homelessness prevention assistance under § 576.103. Recipients and sub-recipients must also maintain written standards of conduct covering organizational conflicts of interest required under 2 CFR 200.318.(b) Individual conflicts of

interest. For the procurement of goods and services, the recipient and its sub-recipients must comply with 2 CFR 200.317 and 200.318. For all other transactions and activities, the following restrictions apply: (1) Conflicts prohibited: No person described in paragraph (b)(2) of this section who exercises or has exercised any functions or responsibilities with respect to activities assisted under the ESG program, or who is in a position to participate in a decision-making process or gain inside information with regard to activities assisted under the program, may obtain a financial interest or benefit from an assisted activity; have a financial interest in any contract, subcontract, or agreement with respect to an assisted activity; or have a financial interest in the proceeds derived from an assisted activity, either for him or herself or for those with whom he or she has family or business ties, during his or her tenure or during the one-year period following his or her tenure.

(2) Persons covered. The conflict-of-interest provisions of paragraph (b) (1) of this section apply to any person who is an employee, agent, consultant, officer, or elected or appointed official of the recipient or its sub-recipients.

Code of Federal Regulations / Title 24 - Housing and Urban Development / Vol. 3 / 2018-04-01206

Additional ESG Funding Allocations

If HUD makes additional ESG funds available to MaineHousing outside of HUD's annual Consolidated Plan allocation process, MaineHousing will establish appropriate program guides, applications, terms and conditions detailing the eligible activities and distribution procedures for such funds at that time and will share this information publicly on our website.

Maine Continuum of Care

Coordinated Entry Policies and Procedures

Table of Contents

Introduction and Overview

Overview of Coordinated Entry

Coordinated Entry Participation

Terms and Definitions

Roles & Responsibilities

Versions of Document

Access

Access Model Overview

Designated Access Points

Specialized Access Points for Subpopulations

Affirmative Marketing and Outreach

Assessment

Overview of Standardized Assessment Approach

Assessor Training

Participant Autonomy and Appeal Processes

Prioritization

Overview of Standardized Prioritization

Prioritization List Management

Referral

Overview of Referral Process

Notification of Vacancies

Participant and Provider Declined Referrals

Data Systems

Overview of Data Systems (HMIS, Comparable Database)

Data Collection Stages and Strategies

Participant Consent Process & Privacy Protections

Evaluation of Coordinated Entry System

Overview of Coordinated Entry Evaluation Process

Revision History

Version	Date – Responsible Party	Key Changes	Status
n/a	9/1/2022 - Erin Kelly, Kate Easter, Tara Hembree, Giff Jamison	Initial Draft	Pending
1.0	9/1/2022 - MCoC Board	Final approval at board meeting	Approved

Introduction and Overview

Overview of Coordinated Entry

Coordinated entry is a consistent, streamlined process for accessing the resources available in the Maine Continuum of Care (MCoC) homeless crisis response system. Through coordinated entry, the MCoC ensures that housing resources and supportive services are used as efficiently and effectively as possible. This is done by assessing households experiencing homelessness quickly and uniformly to connect them to the best available housing resource whenever possible.

Coordinated Entry Participation

All Continuum of Care and Emergency Solutions Grant funded projects are required to participate in the Maine CoC Coordinated Entry Process. Ideally, all homeless assistance projects will participate in Coordinated Entry in some capacity, and the CoC will continue to work to facilitate the participation of new partners.

Terms & Definitions

The purpose of this section is to provide definitions for many of the federal, state, and local terms that are referenced throughout this document.

By Name List	A comprehensive list of individuals who have been identified as experiencing homelessness in our community.
Chronically Homeless	Chronically homeless means: (1) A “homeless individual with a disability,” as defined in Section 401(9) of the McKinney-Vento Homeless Assistance Act, who: i. Lives in a place not meant for human habitation, a Safe Haven, or an emergency shelter; AND ii. Has been homeless continuously for at least 12 months or on at least four separate occasions in the last 3 years, as long as the combined occasions equal at least 12 months and each break in homelessness separating the occasions included at least 7 consecutive nights of not living as described in (i) above.
Case Conferencing	Local process for CE staff to coordinate and discuss ongoing work with persons experiencing homelessness in the community, including the prioritization or active list. The goal of case conferencing is to provide holistic, coordinated, and integrated services across providers, and to reduce duplication.
Continuum of Care	Group responsible for the implementation of the requirements of HUD’s CoC Program interim rule and promotes communitywide commitment to the goal of ending homelessness. The CoC is composed of representatives of organizations, including nonprofit homeless providers, victim service providers, faith-based organizations, governments, businesses, advocates, public housing agencies, school districts, social service providers, mental health agencies, hospitals, universities, affordable housing developers, law enforcement, organizations that serve homeless and formerly homeless veterans, and homeless and formerly homeless persons.

Emergency Shelter	Short-term emergency housing available to persons experiencing homelessness.
Emergency Shelter and Housing Assistance Program (ESHAP)	The Emergency Shelter and Housing Assistance Program (ESHAP) provides agencies with funding and technical support to provide services to people experiencing homelessness. MaineHousing utilizes federal Emergency Solutions Grants (ESG) funding, along with state funds, to provide funding in three areas: Shelter Operations, Housing Stabilization, and Performance incentive.
Emergency Solutions Grant Program (ESG)	HUD funding source to (1) engage homeless individuals and families living on the street; (2) improve the quantity and quality of emergency shelters for homeless individuals and families; (3) help operate these shelters; (4) provide essential services to shelter residents; (5) rapidly rehouse homeless individuals and families; and (6) prevent families and individuals from becoming homeless.
Homeless Management Information System (HMIS)	Local information technology system used by a CoC to collect participant-level data and data on the provision of housing and services to homeless individuals and families and to persons at risk of homelessness. Each CoC is responsible for selecting an HMIS software solution that complies with HUD’s data collection, management, and reporting standards.
Projects for Assistance in Transition from Homelessness (PATH)	Substance Abuse and Mental Health Services Administration (SAMHSA)–funded program to provide outreach and services to people with serious mental illness (SMI) who are homeless, in shelter or on the street, or at imminent risk of homelessness.
Permanent Supportive Housing (PSH)	PSH is permanent housing with indefinite leasing or rental assistance paired with supportive services to assist homeless persons with a disability or families with an adult or child member with a disability achieve housing stability.
Prioritization List	The MCES prioritization list is a subset of the larger hub level Quality By Name List which strives to include the majority of individuals experiencing homelessness in each specific hub area. The MCES prioritization list will be able to be sorted by score on both the state and hub level to help facilitate referrals to housing resource openings.
Rapid Rehousing	Program emphasizing housing search and relocation services and short- and medium-term rental assistance to move homeless persons and families (with or without a disability) as rapidly as possible into permanent housing.
Shelter Plus Care	The SPC (CoC) Program provides housing and supportive services to homeless individuals with disabilities, primarily those with severe and persistent mental illness, substance abuse, and HIV/AIDS. SPC follows a Housing First Model by encouraging recipients to accept supportive services along with rental assistance with a goal of long-term stability in permanent housing. Program participants provide 30% of their income* towards rent while the remaining amount is subsidized through the SPC (CoC) program.

Transitional Housing	Program providing homeless individuals and families with the interim stability and support to successfully move to and maintain permanent housing. Transitional housing funds may be used to cover the costs of up to 24 months of housing with accompanying supportive services. Program participants must have a lease (or sublease) or occupancy agreement in place when residing in transitional housing.
Service Hub	A group of regional providers that creates local foundation for the prioritization and case conferencing of Coordinated Entry, as well as working collectively toward ending homelessness. Each hub supports regional coordination and resource alignment and provides system level data used to improve performance.

Roles and Responsibilities

CoC Board	Responsible for the general oversight of the MCoC, including the CE system, including the approval of the CE Policies & Procedures document.
Coordinated Entry Committee	Committee of the CoC charged with meeting at least monthly to oversee the implementation and evaluation of the Coordinated Entry System.
Coordinated Entry Operator (See Appendix A)	Responsible for the day-to-day operations and management of the overall Coordinated Entry System.
Hub Coordinator	Responsible for hub-level operation and management of the Coordinated Entry System, specifically prioritization and referral case conferencing.
Collaborative Applicant	The MCoC has selected MaineHousing to be their Collaborative Applicant (CA). The CA submits the MCoC NOFO application for funding and administers Planning Grant funds.
HMIS Lead Agency	Operates the Homeless Management Information System (HMIS) on the CoC's behalf. Ensures the CE system has access to HMIS software and functionality for the collection, management, and analysis of data on persons served by coordinated entry. Entity designated by the CoC in accordance with HUD's CoC Program interim rule to operate the HMIS on the CoC's behalf.
Participating Project	CoC and ESG funded housing resources that are required to receive their referrals through Maine's Coordinated Entry system. This can include non-CoC and ESG funded housing resources that volunteer to be part of CES.
Access Point	ESHAP-funded shelters, PATH outreach teams (some) and other providers in each of Maine's Service Hubs that are responsible for completing the Coordinated Entry assessment with participants seeking access to housing resources within a hub, entering that information into HMIS or using otherwise agreed upon means for data submission, and participating in case conferencing as appropriate.
Access Partner	Mainstream providers or institutions that provide necessary services or assistance or interact with people who are experiencing homelessness and know how to connect those people to the homeless service response system.

U.S. Dept. of Housing and Urban Development (HUD)	Federal agency responsible for administering housing and homelessness programs including the CoC and ESG Programs.
U.S. Dept. of Veterans Affairs (VA)	Federal agency responsible for providing health care and other services, including assistance to end homelessness, to veterans and their families.

Access

Access Model Overview

The Maine CoC Coordinated Entry System will strive to ensure equitable access to housing resources for all Maine residents who are experiencing homelessness. In order to accomplish this across such a vast geography, Coordinated Entry will operate locally within the state’s Service Hub structure. Maine has a total of 9 Service Hub areas, each covering one or more counties. Some towns are assigned to Hubs outside their county where that made more sense in terms of access to resources.

- Hub 1: York
- Hub 2: Cumberland
- Hub 3: Midcoast (Sagadahoc, Knox, Lincoln, Waldo, and Towns of Brunswick and Harpswell)
- Hub 4: Androscoggin
- Hub 5: Western: Oxford, Franklin, and Towns of Livermore and Livermore Falls
- Hub 6: Central: Somerset and Kennebec
- Hub 7: Penquis: Penobscot and Piscataquis
- Hub 8: Downeast: Washington and Hancock
- Hub 9: Aroostook

Each of the 9 Service Hub areas will have designated access points as well as hub partners to help ensure that a household experiencing homelessness in any county will have access to the Coordinated Entry System. The goal of establishing localized access points and partners in each of the Service Hubs is to reduce the number of households who do not know where to turn or who to call when they are experiencing homelessness, and to reduce the need for households to leave their communities of origin to seek crisis housing and services in more populated areas of the state.

Designated access points and their responsibilities are described in the section below. Access partners are organizations or institutions in the community whose role is not dedicated to serving people experiencing homelessness, but who frequently interact with the population. This may include hospitals and healthcare providers, local law enforcement, food pantries, employment agencies, Community Action Agencies (CAP), and more. Access partners will not require a formal designation. Instead, each Service Hub team should conduct the necessary outreach and engagement with local access partners to ensure that they are informed about how to connect their clients, when applicable, to the CoC’s Coordinated Entry system.

Note that access to Coordinated Entry is not the same thing as access to emergency services (e.g., emergency shelter) in each Service Hub geography. All households in need of emergency assistance will be able to access those resources outside of the Coordinated Entry system without first having to complete any sort of Coordinated Entry assessment.

Designated Access Points

Designated access points will include all shelters that receive Emergency Shelter and Housing Assistance Program (ESHAP) funding, as well as many Projects for Assistance in Transition from Homelessness (PATH) providers. PATH providers will be asked to serve as access points for their participants if they have the local capacity to do so, and will have the option to decline if they do not.

Because there is such a variety in need and capacity across the state's Service Hub areas, there will also be the option to identify additional access points locally. Additional access points may be necessary if the existing ESHAP or PATH providers in an area are not able to serve as access points for all people experiencing homelessness. This may include households who are staying in emergency shelters that are non-ESHAP funded, households who are staying in transitional housing programs for homeless people that are non-ESHAP funded, and households who are unsheltered but not eligible for services through PATH.

When the need for an additional access point is identified, the Hub Coordinator will serve as the person who coordinates this discussion and communicates the need to the CoC. Additional access points will require approval by the CoC to ensure that one of the following are true:

1. There are available HMIS licenses if the proposed access point does not already have HMIS access; or
2. There is a comprehensive and reasonable plan for ensuring that all participant data is entered into HMIS if the access point is not willing or able to take on the responsibility of HMIS data entry

Access Point Responsibilities

Designated access points are responsible for the following activities:

1. All assessor staff must complete the CoC's annual training on how to complete the standardized assessment
2. Access points must complete the standardized assessment with all households experiencing literal homelessness who present for assistance
 - a. Note: access points will not be responsible for assessing those households who are not eligible for their services (e.g., PATH providers will not be responsible for assessing households who are unsheltered but not PATH eligible, ESHAP shelters will not be responsible for assessing households who are not eligible for shelter entry)
3. Access points must enter the participant information captured during the standardized assessment into the Homeless Management Information System (HMIS) or Comparable Database to ensure that assessed households are placed on the prioritization list
4. Access points must participate in case conferencing meetings at the Service Hub level

Specialized Access Points for Subpopulations

The Maine CoC allows for specialized access points for specific subpopulations: those fleeing Domestic Violence, Veterans, and Youth. These subpopulations can choose to access their population specific resources as well as the mainstream Coordinated Entry System if they are interested in accessing the housing resources associated.

Veterans:

Designated access points for those that served in the military include the Preble Street Veterans Housing Services (VHS) referral line and the National Call Center for Homeless Veterans. Preble Street VHS, a Supportive Services for Veterans Families Grantee, is statewide and is open weekdays from 8:30am to 5:00pm, EST. <https://www.preblestreet.org/what-we-do/housing-services/veterans-housing-services/>. The VA Call Center can be reached 24 hours a day/7 days a week; calls to this hotline will be sent to staff locally at the VA medical center at Togus to follow up with. 1-877-4AID-VET or 1-877-424-3838, <https://www.va.gov/homeless/nationalcallcenter.asp>.

Domestic Violence:

Designated access points for those fleeing domestic abuse & violence include all the Domestic Violence Resource Centers (DVRCs) across the state. Survivors can choose to access CES through a DVRC Access Point or through a mainstream Access Point. If they access CES through a mainstream Access Point, they will be given the choice to continue their Assessment where they are or stop the assessment and to be referred to the local DVRC.

If a Stop & Refer path is chosen, the survivor will be connected to the local DVRC who will then work that survivor from the start of the assessment. Ideally, the survivor will be referred to the DVRC for DV specific support and resources but will continue the CES assessment with the Access Point where they started.

All survivors of domestic abuse & violence or trafficking will be evaluated for eligibility for the DV-specific RRH dollars if referred.

A list of these DVRCs can be found at <https://www.mcedv.org/> and <https://www.wabanakiwomenscoalition.org/>. More information can also be found by calling the statewide domestic violence crisis line at 1-800-834-HELP (4357).

Youth:

Maine's Youth Coordinated Entry system has youth specific shelters that will act as access point: Preble Street's Joe Kreisler Teen Shelter in Portland, <https://www.preblestreet.org/what-we-do/teen-services/joe-kreisler-teen-shelter/>, New Beginnings in Lewiston, <https://newbeginmaine.org/>, and Shaw House in Bangor, <https://www.theshawhouse.org/>. As Youth Homelessness Demonstration Project grantees, Aroostook County Action Program (ACAP) <https://acap-me.org/>, Penquis CAP <https://www.penquis.org/>, and Volunteers of America <https://www.voanne.org/yva-services> locations will also act as access points for the youth CES.

Access Partners

Access partners are providers or institutions that provide necessary services or assistance or interact with people who are experiencing homelessness and know how to connect those people to the homeless service response system (law enforcement, hospitals, etc.). Service hubs will conduct outreach (written and verbal) to hub partners to ensure that they are aware of Maine's homeless response system structure and how to connect literally homeless households to the resources they need.

Hub partners will have an informal relationship to the hubs; whereas they will continue to connect literally homeless individuals to the emergency homeless response resources they need but will not be required to use a specific form or process. If a Service Hub identifies a trend that indicates the need for a more formal process for hub partners to connect households to access points; this can be established and implemented at the service hub level.

Affirmative Marketing and Outreach

In each one of Maine's 9 Service Hubs, there will be a need to raise community awareness about the Coordinated Entry System and access to housing resources. Each area will be expected to engage in broad-based, passive marketing in the community – targeted to spaces that people experiencing homelessness frequent. For example, this could take the form of posters and pamphlets about Coordinated Entry and how a household can access the system to be assessed for available housing resources. Other examples of places in which marketing may be beneficial could include public transportation, bottle redemption centers, laundromats, and libraries, among other places. In addition to the need for local marketing and outreach efforts, the Maine CoC will also engage in state-wide marketing and outreach. This may include information about Coordinated Entry access disseminated through newspaper, radio, television, or other conventional media outlets, as well as social media.

Adding Additional Access Points

The Maine CoC encourages the creation of new access points, should there be a need. The following outlines the process for requesting and approving new access points in specific hubs:

1. Hub Coordinators will be tasked with outreaching local service providers and community partners. In the course of these conversations, HCs will provide the relevant information, including the process of becoming an additional access point and the requirements of an access point, which includes:
 - participating in the mandatory CES assessment training
 - administering the CE assessment tool to participants
 - entering assessment data into HMIS (or determining the approved workaround method)
 - attending case conferencing hub level meetings as needed
2. Once service providers have been briefed on the requirements of becoming an official access point and have agreed to it, hub coordinators should email the CE Committee Tri-Chairs and Homeless Projects Coordinator at Maine Housing. The email should include the name & contact information for the service provider/community partner that wishes to become an access point. The email should also indicate that the potential access point has been fully briefed on the requirements and that they have agreed to them. Finally, the email should outline if the potential access points already have access to HMIS and how many additional HMIS licenses would be needed, if any.
3. The Homeless Projects Coordinator will check with the HMIS team at Maine Housing to see what the availability of HMIS licenses is and will let the tri chairs know if the number of new licenses that can be approved
4. The hub coordinator will then present the proposed access point at the next CE committee meeting for approval or brainstorming possibilities if there HMIS licenses available.

Assessment

Overview of Standardized Assessment Approach

The Maine CoC will provide a standardized assessment process to all Coordinated Entry participants, ensuring uniform decision-making and coordination of care for households experiencing homelessness in the state. A standardized assessment approach allows for all households to be assessed for housing resources in the same way regardless of where they are assessed and who they are assessed by, with the goal of reducing disparities in access to housing resources and how households are prioritized for them.

The Maine CoC Coordinated Entry Committee, with input from key stakeholders in the community, has designed a standardized assessment tool (See Appendix C). This tool utilizes a phased and progressive engagement approach; first addressing a household’s emergency needs, then attempting to identify other natural supports or alternatives to homelessness through a housing problem-solving conversation, and then if need be; assessing for length of time homeless, housing barriers, and other key factors necessary to prioritize households for the resources available through Coordinated Entry. The assessment tool contains a total of five, phased sections:

Addressing Household’s Urgent Needs	The first phase focuses on identifying the person’s immediate needs to ensure that they are safe (e.g., need access to shelter, need access to food, need connection to DV services)
Housing Problem Solving	The second phase of the assessment is a conversation guide to explore whether the household may have other natural supports or safe alternatives to entering the homeless system of care
Collecting Contact Information	The third phase of the assessment is focused on collecting all of the household’s contact information to ensure that the CES knows how to communicate with the household moving forward
Housing History	The fourth phase of the assessment is focused on collecting information about the household’s housing and homeless history and barriers to housing.

Housing Preferences	The fifth phase of the assessment is focused on collecting information about the household's housing needs and preferences.
---------------------	---

The assessment tool does not, and in some cases should not, be completed all at once. The goal of a phased, progressive engagement assessment tool is to complete what makes sense in the moment and build off of each section when moving on to the next. Additional detail around use of the tool and assessor staff requirements will be provided in the annual assessor training (see next section) as well as a separate HMIS workflow document.

Assessments will be updated every 6 months, based on the day that the first assessment was completed in full. At this time, if the participant is still experiencing homelessness, updated information can be updated in HMIS or Comparable Database. If the participant's situation has changed so that their prioritization score will be increased, this should be communicated the Project and Hub Coordinators and reflected on the prioritization list. Prioritization scores will not be decreased based on updated information.

Assessment Process

After completion of the Assessment Tool, pertinent assessment data is entered into the Maine CoC's Homeless Management Information System (HMIS) or Comparable Database. This allows for the creation of the MCES Prioritization list that is used to determine which participant(s) is referred to the housing resource(s) available in the Coordinated Entry System (see Prioritization for more detail).

Assessor Training

The Maine CoC is committed to ensuring that all participating access points and assessor staff have sufficient training to implement the Coordinated Entry system in a manner consistent with the design vision and in accordance with the policies and procedures.

The MCoC will provide training annually via the CE Operator, at minimum, to all access points and assessor staff. This training will be mandatory and offered at no cost. Training topics will include the following:

- Review of the CoC's Coordinated Entry policies and procedures
- Intensive training on how to use the assessment tool
- Training on requirements for data collection, case conferencing participation, etc.

Participant Autonomy and Appeal Process

It is crucial that persons served by Maine's Coordinated Entry System have the autonomy to identify whether they are uncomfortable or unable to answer any questions during the assessment process. The refusal of the participant to respond to assessment questions shall not adversely affect a household's ability to be added to the prioritization list based on whatever information they are comfortable sharing.

Note that some Maine Continuum of Care funded housing programs require collection and documentation of a participant's disability or other characteristics or attributes as a condition for determining eligibility. Therefore, participants who choose not to provide information in these instances could be limiting potential referral options.

The CoC is committed to ensuring that no information is used to discriminate against or prioritize households for housing and services on a protected basis such as race, ethnicity, religion, national origin, sex, age, familial status, disability, actual or perceived sexual orientation, gender identify, or marital status.

Prioritization

Overview of Standardized Prioritization

The Maine CoC will use the data collected through the Coordinated Entry assessment process to prioritize people experiencing homelessness in the state of Maine for housing resources.

Households will be prioritized based on the numeric score that is produced by the assessment tool. This score is based primarily on a household's length of time homeless (days) in the last three years. The assessment tool also considers additional criteria that may further prioritize a household based on the following:

- "Long-term stayer Status" – households who have 6+ months of homelessness in the past year
- People actively fleeing domestic violence
- People experiencing unsheltered homelessness
- Barriers to accessing housing

This prioritization method will be utilized for all housing resources available through the Coordinated Entry Process.

The Maine CoC prioritization process, to ensure that unsheltered households have equitable access to housing resources, has created a uniform method of taking non-HMIS days homeless into account when establishing a household's length of time homeless in the last three years. Note that while households may have an increased prioritization score at time of assessment due to fleeing domestic violence or experiencing unsheltered homelessness, their overall prioritization score will not decrease, should their situation change. Conversely, prioritization scores may increase due to a change in situation (i.e. going from sheltered to unsheltered homelessness). These changes may be reflected by submitting updated assessment information.

Prioritization List Management

At least once weekly, the HMIS team at MaineHousing will generate a report from HMIS, in collaboration with MCEDEV from the Comparable Database, that will provide data for the MCEDEV prioritization list. The prioritization list can be viewed on both the state and hub level. This report will include data points generated from completed CE assessments, including, but not limited to, name, date of birth of the participant, prioritization score, and preferred location of housing placement of the participant. The Maine Housing CoC Project Coordinator will work Hub Coordinators and MCEDEV Housing Services Coordinator to cross check the existing prioritization list with the updated weekly reports pulled from HMIS or Comparable Database. The CE prioritization list is a subset of the larger hub level Quality By Name List, this list strives to include the majority of individuals experiencing homelessness in each specific hub area. The MCEDEV prioritization list will be able to be sorted by score on both the state and hub level to help facilitate referrals to housing resource openings.

Participants will be asked to sign releases of information to give permission for their names and personal information to be placed onto the MCEDEV prioritization list. Each participant will be given the opportunity to utilize a case number rather than their name, as well as to share limited personal information. Participants identified as fleeing domestic violence will automatically be assigned a case number before being placed on the prioritization list.

Overview of Prioritization Process for Victim Service Providers (aka DVRCs)

The primary method of prioritization is the same for VSP access points as it is for mainstream access points. However, due to the required maintenance of confidentiality for those identified as fleeing domestic abuse & violence, sexual assault, stalking, and trafficking, (encoded in the law (Violence Against Women Act, reauthorized in 2022)) DVRC Access Points will use a Subpopulation Referral Form (appendix E) to move survivors onto the Prioritization List.

For the most part, DVRCs will pass survivor request to be added to the CES Prioritization List through the Housing Services Coordinator at MCEDEV who will then assign a DVRC-specific code to the survivor's case and will enter the deidentified name on the By Name List.

It should be noted that any client may elect to use this referral form to maintain their own confidentiality when being placed on the By Name and Prioritization Lists.

Referral

Overview of Referral Process

Referral, in the context of Coordinated Entry, refers to the process by which a participant who is prioritized on the by-names list is connected to a housing opening. All CoC Program- and ESG Program-funded housing projects must accept referrals exclusively through the CoC's defined CE process as described below. Housing resources available from alternate funding streams may also opt in to the Maine CoC's Coordinated Entry process upon request. The referral process will take place at the Service Hub level.

Step 1: Notification of Housing Opening

Housing provider will notify Hub Coordinator of opening, providing as much information as possible including:

- # of Referrals desired
- Unit size, location
- Key eligibility criteria (e.g., DV only)
- Accessibility
- Services attached or not
- Application process
- Date by which they would like list of referrals

Step 2: Identification of Households to be Referred

Case conferencing meetings will be used to identify housing needs and preferences for top 10-20 households on the list; therefore Hub Coordinator will be able to make referrals in real time as they are requested by housing providers with openings.

As households with no case manager near top of list, hub team will work together to identify support so that by the time a household is being referred to a housing opening, a case manager or supportive provider has been identified to work with them.

Hub Coordinator will use the by-names list to refer the requested number of prioritized households to the housing opening. In some cases, the household(s) being referred may not be the very first name on the list. In some cases, Hub Coordinator will use housing needs and preferences of those households toward the top to ensure appropriate match. For example, a housing provider may have a unit that is available only to households who have a documented disability. If the first person on the list does not have a disabling condition, Hub Coordinator may look to next person on by-names list.

The Hub Coordinator will send the housing provider a list of the names of the referred households in writing so that they are aware of who they will be hearing from.

Step 3: Notifying Referrals

Within 3 business days of receiving the request for referrals from the housing provider, the Hub Coordinator will contact the case manager or service provider of the prioritized household to inform them of the referral and the application process that should be followed. The Hub Coordinator will make at least 3 attempts at contact on non-consecutive days if the case manager or service provider is unreachable at first contact. The Hub Coordinator should utilize multiple methods of contact (phone, e-mail).

In instances where the Service Hub Team has not identified a case manager or provider to support a household on the by-names list, the Hub Coordinator may contact the person directly to inform them of their referral to a housing opening.

Beginning on the date of the first attempt at contact, the referred household will have 14 days to respond to the housing offer. Hub Coordinator will inform the housing provider of the 14 day period in which they should expect to hear from the identified referrals.

Step 4: Feedback Loop Between Hub Coordinator and Housing Provider

The housing provider will be responsible for communicating with the Hub Coordinator to inform them of the outcome of the referrals made. The Hub Coordinator will be responsible for updating the status of those household's on the by-names list as appropriate.

Households that decline referral will maintain placement on prioritization list and be referred as appropriate to future housing openings unless they choose to have their name removed from consideration, including from the BNL.

For households that do not respond to housing provider's outreach— Hub Coordinator will work with case manager and/or hub team to determine whether household is active or inactive on the by-names list.

Tie Breakers

In the event that there are multiple households at the top of the by-names list with the same prioritization score; the Hub Coordinator will determine which household is referred first by using the following tie-breaking factors, in this order:

- Length of time homeless (total # of months homeless in last 3 years)
- Imminent risk of harm or death (to be determined via case conferencing)

Alternate Referral Processes

Some housing providers may require a specialized or alternative referral process to that which is outlined above. Housing providers that require this alternate process must get approval from the CoC board before moving forward and must otherwise follow all CES policies and procedures, including those regarding participant and provider declined referrals.

Use of Case Conferencing

Case conferencing will take place within each Service Hub, organized and facilitated by the Hub Coordinator. At launch of Coordinated Entry, case conferencing will take place weekly. Hub Coordinators will work with service hub teams to determine an appropriate cadence of case conferencing meetings over time – dependent upon local needs and capacity.

The purpose of case conferencing will be as follows:

1. Ensure that all households experiencing homelessness in the Service Hub geography are identified, added to the by-names list, and assessed for housing resources
2. Ensure that all households on the by-names list, as they near the top (within 1-20 on list), have an identified service provider that has committed to supporting the household at the time of referral with elements of the process like application and lease-up
3. To discuss the housing needs and preferences of those households nearing the top of the list so that Hub Coordinator is equipped with enough information to make referrals in real time, outside of case conferencing meetings, as they are contacted by housing providers

Each participant will be asked to sign a release of information before being discussed at case conferencing, which can be found in Appendix B.

Case Conferencing for VSPs (aka DVRCs)

MCEDV Housing Service Coordinator will notify Housing Navigators with clients on the Prioritization list when their client is on the list. Navigators may attend their closest Case Conferencing meeting to best advocate for

the survivors' needs. No PII will be released at Case Conferencing other than what it already on the By Name or Prioritization List.

Participant and Provider Declined Referrals

The Maine Coordinated Entry process promotes access for all eligible participants in need of housing by overseeing an objective referral process in which all eligible participants are treated in a consistent manner. *Housing providers are responsible for assuring that a participant meets the contractually required eligibility requirements for their program.*

A referral may be unsuccessful due to a participant refusing the resource, by agency denial, or based on program eligibility requirements not being met. Any unsuccessful referral must be documented by email to the Hub Coordinator with the participant name, date, and reason for denial. The Hub Coordinator will log the client ID, date, and reason of denial into the Coordinated Entry Denial Tracking spreadsheet stored in Sharefile. The Maine CE Steering Committee or Maine Housing as the CE Operator may follow-up with the housing program and the participant referred in order to understand the circumstances of the returned referral.

Program denials will be monitored at the system level. Maine Housing as the CE Operator will include in its quarterly report to the CE Steering Committee and Maine CoC Board data to show the reasons for denial for available housing openings in a given quarter so the committee may monitor and/or troubleshoot trends on a system level.

Referral Procedure:

1. Housing providers must accept a participant who is referred and meets established eligibility criteria.
2. The housing provider must provide the reason for the unsuccessful referral in email to the Hub Coordinator and include details regarding the reason the referral was unsuccessful.

Reasons for Program Denial:

A-H may be automatic denials logged by the housing provider. Housing providers may move on to subsequent participants without using system-level case conferencing. Reason I, Health & Safety Risk must follow a system-level case conference process. See below under reason I.

- a. Participant did not call or show up for their appointment with the housing provider – the housing provider is unable to reach the participant for at least 48 hours and has attempted to reach them through any of the identified means
- b. Ineligible for Housing Program per contractual obligations – a referral was made based on the participant's apparent eligibility, but due to overlooked or undisclosed information, the participant is not eligible for the program. [i.e. additional information was disclosed/discovered impacting program eligibility]
- c. Full capacity- the housing program is at full capacity and does not have an available resource for the referral that was sent.
- d. Participant refused the housing offer- a referral was made, and a participant refused the available resources after speaking with the housing provider and learning more about the program.
- e. Re-enrollment would result in health/safety risk-the participant previously resided in the housing program they were referred to; re-enrollment in the program would result in a significant health and safety risk.
- f. Self-resolved- participant has found permanent housing outside of the Maine CE process.
- g. Falsification of documents-participant falsified documents such as a housing application, failing to disclose information that makes them ineligible for the program.

h. Local restrictions- participant is restricted locally from occupying a project or housing resource. Examples may be justice-system restrictions on areas people may live; zoning or neighborhood requirements; etc.

i. Health & Safety Risk – the program is denying the person/family for some other reason not described above. The housing provider must inform the participant of the reason the referral was unsuccessful.

Two Step Process for Denials Related to Exhibited Behaviors Causing Health or Safety Concerns

Based on a participant’s exhibited behavior, enrollment in the project would result in a significant health and safety risk. This means a participant may not be denied solely on information derived from background checks, but must be supported by provider observation, reports from other providers or through the participant’s application or interview. A denial of this nature is only applicable when a participant has displayed behavior to the project, housing navigator, or other provider staff that warrants a legitimate health or safety concern for the project. Prior to denying a referral based on health or safety reasons, the housing provider must follow a two-step process.

Step 1 - Attempt to Resolve Concern with Applicant: Request documentation from the participant and/or meet with the participant to discuss the circumstance and any changes that have occurred to improve the health or safety risk. Documentation requested must be as low-threshold as possible for the participant to retrieve quickly; housing providers are required to accept and review self statements as a potential source of documentation to explain the risk. Additionally, participants cannot be required to enter into service contracts or provide proof of service or treatment participation as a condition of acceptance into the unit. If the meeting satisfies the housing provider’s concerns, they do not need to proceed to the next step and may accept the participant immediately.

Step 2 - Schedule a Case Conference: If a participant’s explanation does not satisfy the housing provider, prior to issuing a denial, the housing provider must first set up a case conference with the case conferencing group for the particular service hub the participant’s housing offer originated from. The goal of the case conference is to leverage system partners to find solutions or other possible housing pathways for the participant, with the goal of either reversing the denial or finding another possible housing placement. The case conferencing group does not have the power to require the denying provider to accept the participant.

- The case conference group for health and safety denials will consist of the service hub’s case conference group; 1-2 members from the Coordinated Entry Committee; and 1-2 members from the Regional Homeless Council.
- Case conferences will be triggered by the housing provider informing Maine Housing as the CE Operator of the health and safety denial. Maine Housing will activate the case conference.
- Case conferencing members will need to be available on an ad hoc basis to ensure efficiency, generally within three business days, but no more than five business days.
- Case conferences will be scheduled to allow most members to attend, but move forward without full attendance to promote swiftness in the CE referral process.
- The housing provider may deny a referral based on health or safety concerns if an alternative housing pathway or solution cannot be found through the above case conferencing.
- No rejection is ever permanent- the participant will remain on in the CE priority pool for future housing openings, including openings that originate with the denying project. The original housing provider who denied the referral will be asked to reconsider any changes in the applicant’s exhibited behavior if the applicant is re-referred to a new opening the project administers.

Please note that the health and safety reason for denials should be used in the rarest of cases.

Appendix A

Maine Coordinated Entry (CE) Operator Role

Current Maine CE Operator: Maine Housing

Scope of Role:

1. Establish day-to-day management structures. Includes:
 1. Working with stakeholders to monitor and ensure the CE system is in compliance with all HUD requirements
 2. Maintaining CE policies and procedures to ensure they are clear, updated and accessible to stakeholders, including any communication timelines and expectations between parties (i.e. Maine Housing will respond to send referrals for a vacancy in x business days).
2. Establish clear, accessible communication plans. Includes
 1. Structuring, facilitating and/or delegating case conferencing
 2. Implementing the below accountability mechanisms
3. Promotes, develops and trains on standardized assessment processes
4. Reports of CE participation by projects to the Project Monitoring Committee based on MCoC-approved monitoring criteria
5. Manages priority list (refresh, update)
6. Manages referral mechanism to vacant projects
7. Convenes stakeholders to frequently review and improve the CE process

Accountability Mechanisms:

- Provide the CE Steering committee with monthly reports on how the CE system is performing.
 - See next section for sample elements of a report
- Establish a frontline staff CE learning collaborative as a sub-committee of the CE Steering committee to incorporate real-time input into CE implementation.
- Create and distribute marketing and materials to stakeholders outside of the CE committee on how CE will work, how participants are affected, how CE is overseen, how suggestions can be made, and how decisions are made about changes to CE.
- Distribute clear appeals procedures for both participants and providers to use.
- Incorporate an anonymous avenue for providers to submit concerns or grievances to the CE Steering Committee

Monthly Reporting Template (Sample)

1. Compare our measures to how our system performed prior to CE implementation to evaluate where CE has improved and challenged our system.
2. Geographic coverage metrics
3. Utilization of CE- *how many assessed, how many placed, how many waiting*
4. Process measures- *time from assessment to referral; time from referral to program enrollment*
5. Prioritizing the most vulnerable- *scores and length of time homeless of program enrollments*
6. Sub-population focus of the above measures; equity overlay
7. Rate of housing program denials of participants
8. Reasons for housing program denials of participants
9. Challenges and successes of implementation (qualitative)

Appendix B

MAINE Continuum of Care (MCoC) COORDINATED ENTRY SYSTEM (MCES) & Service Hub

Case Conferencing Release of Information

Agency Name: _____

This Agency is part of a group called the Maine Continuum of Care (MCoC) Coordinated Entry and Service Hub _____ which is a group of agencies working together to provide housing resources to people experiencing homelessness. A list of all member agencies in the MCoC and Service Hubs is available online at www.mainehomelessplanning.org.

Purpose: The purpose of this form is to obtain consent to share your information at service hub case conferencing meetings and to place your name on the Service Hub By Name List (BNL). By doing this, Service Hub agencies will work to refer you to housing available through the Coordinated Entry System.

This form allows you to choose how information will be shared during case conferencing. Service Hub case conferencing is defined as meetings of Service Hub members to best match individuals experiencing homelessness to available resources. Case conferencing meetings will also use a By Name List, which is a comprehensive list of individuals who have been identified as experiencing homelessness in our community.

By signing this release, you allow MCoC and Service Hub _____ member agencies to share information about you and your household. This helps agencies focus on your housing needs and work toward your household's identified goals.

You may decline to allow any of your information to be shared with other agencies. If you choose not to share your information, you and your household may have fewer housing opportunities through CES. You or your household will never be denied services if you decline to share information.

Case conferencing meetings will focus on how providers can best meet your needs and end your homelessness as quickly as possible, including providing outreach services to you and connecting you to housing resources. Types of information that might be shared on the By Name List during case conferencing meetings include:

- Personal identifying information for you and your household (examples: name, date of birth, gender, etc.)
- Past or current participation in other housing and supportive service programs
- Contact information
- Information about your military service and VA eligibility
- Housing history and housing status
- Household income, financial assistance and source(s)
- General disability information relevant to housing

I, _____ (Printed Name of Participant) agree to share information with the Maine Service Hub _____ and MCoC and its participating member agencies as detailed below.

Please initial your preferred level of disclosure and participation in Service Hub Case Conferencing:

_____ **Share my information:** I authorize _____ (Name of Agency) to share the above listed information about me and my household members during case conferencing to determine eligibility for housing openings and connect me to other services, as applicable.

_____ **Share my information using a case number:** I authorize the agency listed above to share the following information about me and my household members during case conferencing: age bracket, veteran status, disability status, household size, length of time homeless and housing history. Instead of sharing my name during case conferencing, I understand that a case number will be utilized to identify me and my household members. *

_____ **Do not share my information:** I do not wish to have any of the above listed information discussed at case conferencing. I understand that not authorizing the sharing of this information may limit participating agencies' ability to locate me and notify me of available openings.

***PLEASE NOTE: PERSONS UTILIZING DOMESTIC VIOLENCE RESOURCE CENTERS AND ARE FLEEING DOMESTIC VIOLENCE, SEXUAL ASSAULT AND/OR HUMAN TRAFFICKING WILL AUTOMATICALLY BE REFERRED BY CASE NUMBER, ASSIGNED BY THE VICTIM SERVICES AGENCY.**

By signing below, you acknowledge that you have read, or have had read to you, all the information above and have chosen to sign this form voluntarily. Your signature also indicates you understand that:

- Participation in the MCES does not guarantee you housing assistance
- Additional information and documentation may be required by an agency that is offering housing or supportive services before entering the housing or supportive services program
- This consent is valid for one (1) year from the effective date of your signature below
- You can cancel your consent any time by written request
- You have a right to request a copy of this consent form after you have signed it

Participant Printed Name: _____

Participant Signature: _____ Date: _____

Participant Representative Printed Name: _____

Representative Relationship to Participant** : _____

Representative Signature: _____ Date: _____

Agency Witness Printed Name: _____

Agency Witness Signature: _____ Date: _____

**Examples of authorized representative are: guardian, power of attorney and others as defined as law.

For Agency Use only (please initial)

_____ The participant above received a telephonic explanation of this form. On behalf of the participant, staff at this Agency served as the representative.

_____ The Consent was read in its entirety.

Appendix C

See Attached.

Appendix D

Grievance and Appeal Policy and Procedure

All participants and programs involved in the CES must be afforded the right to submit grievances against providers or the CES itself, and must be afforded the right to appeal decisions made by the providers or by CES. As a publicly supported process, the CES must also allow grievances from outside parties. This section will enumerate the processes by which grievances and/or appeals will follow.

In all cases, a grievance can encompass any aspect of the CES process with which the aggrieved participant or program is not satisfied. Every effort should be made to resolve grievances informally, before a formal grievance process is initiated. In the instances where the aggrieved party is dissatisfied with a decision made by a program or the CES, this dissatisfaction would amount to an appeal of that decision. While the terms are distinct, the process for addressing these is the same.

Scope

These procedures shall address grievances and appeals of the CES itself. Any program or person who interacts with the Coordinated Entry System may file an appeal, regardless of whether or not the program or person is participating in the CES. Each participating program must have its own internal grievance and appeal process. In instances where the aggrieved party's complaint involves a program level decision, or the actions of a program staff, then that program's grievance and appeal policy shall be used. CES grievance and appeal procedures will be utilized when the complaint pertains to the one or more of the following:

- Access to Coordinated Entry System (i.e. participant encounters a barrier to CES Access)
- Assessment (e.g. no assessment provided)
- Prioritization (e.g. disagreement with housing designation)
- Housing referral (e.g. lack of follow through from housing provider)
- Other (please be specific)

The grievance may also pertain to actions or decisions of the CoC Project Coordinator, or the case conferencing group, in respect to the operation of the Coordinated Entry System. If it is uncertain whether the grievance is program related or system related, the Project Coordinator and a representative from the agency in question will make a determination. Participants are welcome to have an advocate, such as a caseworker, available to support them through the entirety of the process, if this is what they wish.

Participant/Citizen grievance and appeal

Step One Grievance/Appeal

Each participant will have the opportunity to resolve any complaints through an informal conversation, during which the aggrieved person will have an opportunity to express their concerns and have them addressed. This informal conversation should take place within 10 business days of the occurrence of the CES process in question. If a solution is unable to be reached, the participant will have the right to the official grievance and appeal process. Participants will be able to move right to the formal process, if that is what they wish.

If the party chooses to carry their grievance forward, at this point they shall complete a CES Grievance Form. This form will detail the nature of the grievance and include all supporting evidence for the grievance. The form shall be written in a manner that will allow people to complete and submit the form without assistance if necessary, but people may accept the assistance of a caseworker in completing and submitting the form as well. This form should be submitted within 10 business days of the informal conversation. The grieved party is welcome to submit any supporting written materials with the form, should they wish.

The completed CES Grievance Form will be transmitted to the coordinated entry email listserv at Maine Housing. A member of that listserv will then notify members of the appeal hearing pool that a grievance had been received. This appeal hearing pool will consist of all 9 Hub Coordinators and the tri-chairs of the CES committee. The appeal hearing meeting must occur within 10 business days of the CES Grievance Form being received. Appeals will be heard by two available Hub Coordinators and one CES Tri-Chair. Program participants will be given the opportunity to provide verbal testimony to the hearing group. A ten-minute time frame will be allowed to present the grievance or appeal directly to the group. The hearing group will specify the time and date for that testimony. The verbal testimony must be provided within the ten (10) business days hearing window.

In the case of an appeal, the original decision will be either upheld or overturned. In the case of other grievances, the grievance will be held to be either founded or unfounded. If founded, the Project Coordinator will consult with the MCOC Tri-Chairs to determine what corrective actions must be taken.

In all cases, the aggrieved party will be informed of the decision in writing within ten (10) business days of the filed grievance. The notice of decision will also include information about what next steps may occur. If the person is still dissatisfied with the decision, they may choose to escalate their grievance or appeal.

Step Two Grievance/ Appeal

In cases where the aggrieved party is not satisfied with the decision of the Step One process, they may escalate their grievance/appeal.

The party will send their Grievance Form, supporting evidence, and a copy of the Step One decision to the COC Tri-Chairs within 10 business days of the Step One decision. The aggrieved person will be given the opportunity to provide verbal testimony to the hearing to the CoC Tri-Chairs. A ten-minute time frame will be allowed to present their grievance or appeal directly to the group. The CoC Tri-Chairs will specify the time and date for that testimony. The verbal testimony must be provided within the ten (10) day hearing window.

The Tri-Chairs shall consider the evidence and choose to either uphold or overturn the Step One decision. If the appeal involves an agency represented by one of the Tri-Chairs, that chair shall recuse themselves from the process. This decision must be rendered within 10 business days of the Step Two process being initiated. The aggrieved party will be informed of this decision in writing. All decisions at this stage are considered final.

Program Grievance vs CES

In the case of a program wishing to lodge a grievance against the CES, a similar process shall be followed. This process is to address interagency concerns; a program may not use this process to file a grievance or appeal on behalf of an individual participant.

Step One Grievance/Appeal

The aggrieved agency shall compose a formal letter that details the nature of the grievance or appeal, and include all supporting evidence. This letter and evidence shall be sent to the CES Committee Chairs. In the case that the grievance involves a CES Chair's agency, the complaint will be forwarded to the CoC Tri-Chairs, who will then hear the appeal.

The complaint and supporting evidence will be considered by the appropriate group as detailed above, who will render a decision within 30 days. The group hearing the appeal will also make any decision on corrective actions if necessary. This group will notify the aggrieved agency in writing as soon as a decision is made, as well as what next steps may occur.

Step Two Grievance/Appeal

If the aggrieved agency is not satisfied with the decision of the Step One group, they may choose to escalate the complaint to Step Two. The agency must submit a Step Two complaint within 30 days of receiving notice of the Step One decision.

A Step Two agency complaint will be sent to the CoC Board President. It will take the form of a formal letter detailing the initial grievance or appeal, supporting evidence, and a copy of the Step One decision.

The Step Two complaint will be considered by the CoC Board at their next regular meeting. If the complaint is received less than five (5) business days prior to the next meeting, the Board may opt to defer the consideration until the following meeting. Any members of the Board whose agencies are involved in the complaint will recuse themselves from the process. The Board shall render a decision, and determine any corrective action if necessary. This will be communicated with all involved parties within five (5) working days of the meeting. All decisions at this level are considered final.

Recordkeeping

The CoC Project Coordinator shall keep records of all CES grievances/appeals, and their results. Those records shall be forwarded to the Evaluation Entity, the CES Committee, CoC or CoC Board at their request. Records of grievances and appeals shall be kept without participant PII; only aggregate data with unique identifiers will be kept to preserve participant confidentiality. As part of the regular quarterly reporting, the CE Operator will present the number and disposition of all appeals and grievances to the CE Committee, as well as the CoC and CoC Board.

Affirmative Outreach

All participants in the Coordinated Entry System must be made aware of their rights to file grievances and appeal CES decisions. CES will provide all CES participating providers with language that can be included in existing outreach documentation, and/or outreach materials. Information about CES grievances and appeals can be posted publicly at CES access points, or given directly to the participant upon their initial assessment.

Appendix E

Maine State Housing Authority (MaineHousing), the Maine Coalition to End Domestic Violence (MCEDV), and the Maine Continuum of Care (CoC) recognize the highly sensitive nature of information gathered from individuals experiencing domestic abuse and violence, sexual assault, and human trafficking. These groups have worked together to develop protocols to ensure that the Victim Service Providers (VSPs – also known as Domestic Violence Resource Centers (DVRCs)) and their clients are included in the Coordinated Entry/Assessment process while adhering to the strict confidentiality requirements mandated by federal laws protecting victims of domestic abuse and violence.

Housing referrals from the DVRCs will be handled differently by the Hub Coordinators and the CES team.

DA&V clients will be given one Assessment score at entry.

If a client meets with a non-DVRC and wants referral to a DVRC for continued service, they may request this and a warm referral may be completed.

After the Assessment is completed, a client will be assigned an Empower ID number.

They will then be assigned a CES ID Number by the DVRC submitting this form.

Numbers should be created as such:

DVRC012022 – to identify the DVRC name, the number the client is in that DVRC's list, and the year submitted to the list (for instance, a client working in Hub 6 might have an ID of SV022022 meaning that Safe Voices worked with that client, they are the 2nd client from SV to enter the list, and it was 2022 when they were entered)

This form should be completed for inclusion to the QBNL/Prioritization List.

There are 3 ways this can happen, depending on what the client's wishes are (must be backed up with a signed, time limited release of information form):

1> full identification

2> partial identification

3> anonymity

When the Hub Coordinator determines that a DVRC referral is the next appropriate match for available housing resources, the referring agency and housing provider will coordinate services using a time-limited release of information.

This form may also be used by any provider not participating in Maine HMIS for inclusion onto the QBNL/Prioritization List. This includes Youth, non-HMIS users, Veterans, and those who have concerns about their personal information being in a semi-public venue.

Client Unique Identifying Number: _____

Is this Assessment Score for a Family or Individual ?

If Family, number in family?

Program entry date _____

Assessment complete date _____

Is the Client or Head of Household a (check all that apply)

Disabled Chronically Homeless Veteran

Hub number: _____

DVRC Advocate Name:

Q1 Enter your current, or most recent, residential zip code.

Answered: 61 Skipped: 0

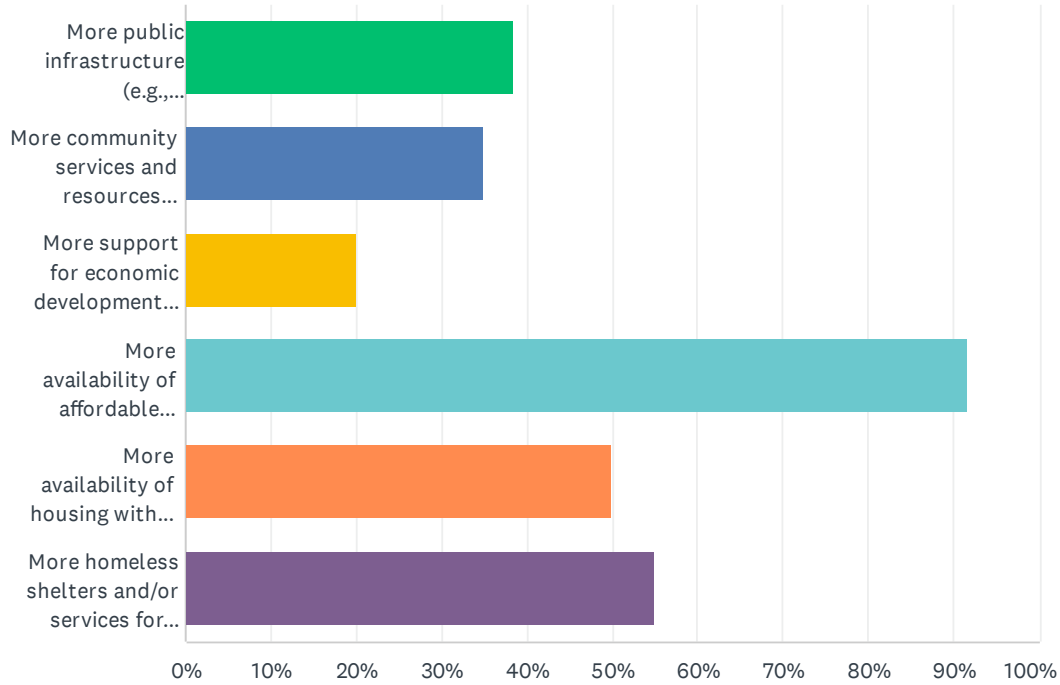
#	RESPONSES	DATE
1	04627	7/15/2024 12:20 PM
2	04072	7/14/2024 8:38 PM
3	04330	7/12/2024 10:12 PM
4	04401	7/11/2024 9:57 AM
5	04101	7/11/2024 8:59 AM
6	04660	7/10/2024 4:17 PM
7	04530	7/10/2024 4:13 PM
8	04106	7/10/2024 8:18 AM
9	04609	7/10/2024 8:10 AM
10	04605	7/9/2024 6:43 AM
11	04101	7/8/2024 4:05 PM
12	mary hastings 04002	7/8/2024 3:19 PM
13	04901	7/8/2024 2:09 PM
14	04073	7/8/2024 12:28 PM
15	04073	7/8/2024 12:26 PM
16	04901	7/8/2024 12:15 PM
17	04101	7/3/2024 7:00 PM
18	04254	7/2/2024 10:16 AM
19	04240	7/1/2024 10:02 PM
20	04032	7/1/2024 7:30 PM
21	04346	7/1/2024 2:08 PM
22	04348	7/1/2024 1:58 PM
23	04401	7/1/2024 12:54 PM
24	04290	7/1/2024 12:00 PM
25	04468	7/1/2024 11:36 AM
26	04096	6/29/2024 10:19 PM
27	04472	6/27/2024 5:28 PM
28	04046	6/24/2024 6:47 AM
29	04901	6/18/2024 8:49 PM
30	044014	6/18/2024 11:34 AM
31	04579	6/18/2024 11:03 AM
32	04021	6/18/2024 10:19 AM
33	04444	6/18/2024 9:50 AM

Consolidated Plan Survey

34	04097	6/18/2024 9:43 AM
35	04240	6/18/2024 9:30 AM
36	04401	6/18/2024 8:11 AM
37	04743	6/18/2024 6:15 AM
38	04011	6/17/2024 11:38 PM
39	04530	6/17/2024 9:22 PM
40	04732	6/17/2024 6:36 PM
41	04011	6/17/2024 2:12 PM
42	04011	6/17/2024 10:56 AM
43	04086	6/17/2024 8:46 AM
44	04011	6/17/2024 8:42 AM
45	04743	6/17/2024 8:19 AM
46	04073	6/17/2024 7:59 AM
47	04046	6/15/2024 2:55 PM
48	04011	6/14/2024 3:36 PM
49	04086	6/14/2024 11:38 AM
50	04092	6/14/2024 10:21 AM
51	04074	6/14/2024 8:45 AM
52	04086	6/14/2024 5:28 AM
53	04556	6/13/2024 3:45 PM
54	04416	6/13/2024 7:38 AM
55	04093	6/12/2024 3:55 PM
56	04284	6/12/2024 12:00 PM
57	05430	6/12/2024 11:07 AM
58	04429	6/12/2024 9:56 AM
59	04401	6/12/2024 9:48 AM
60	04555	6/12/2024 9:33 AM
61	04861	6/12/2024 7:50 AM

Q2 What do you think is most needed for the healthy development of your city/town and community? (select up to three options)

Answered: 60 Skipped: 1



ANSWER CHOICES	RESPONSES
More public infrastructure (e.g., transportation, broadband internet, sanitation services, etc.).	38.33% 23
More community services and resources (e.g., childcare programs, public parks, community centers, etc.).	35.00% 21
More support for economic development (business development support services, grant funding, tax benefits).	20.00% 12
More availability of affordable housing options.	91.67% 55
More availability of housing with supportive services for those with special needs (older adults, physical or mental disability, etc.).	50.00% 30
More homeless shelters and/or services for those currently experiencing or at risk of homelessness.	55.00% 33
Total Respondents: 60	

#	OTHER (PLEASE SPECIFY)	DATE
1	New construction of modest size (1,000 square foot/price \$250,000) single family homes on 1/2 acre lots.	7/1/2024 2:08 PM
2	More housing with supportive services for individuals with developmental disabilities, Autism and TBI.	7/1/2024 1:58 PM
3	'Affordable' housing isn't really affordable if it still takes up a large chunk of people's income. Same goes for childcare assistance. These programs are helpful but don't get people off the program in the long run. You get a little more ssi or work income but your rent goes up and food stamps go down for example. This doesn't really help anyone & anyone that has ever	7/1/2024 11:36 AM

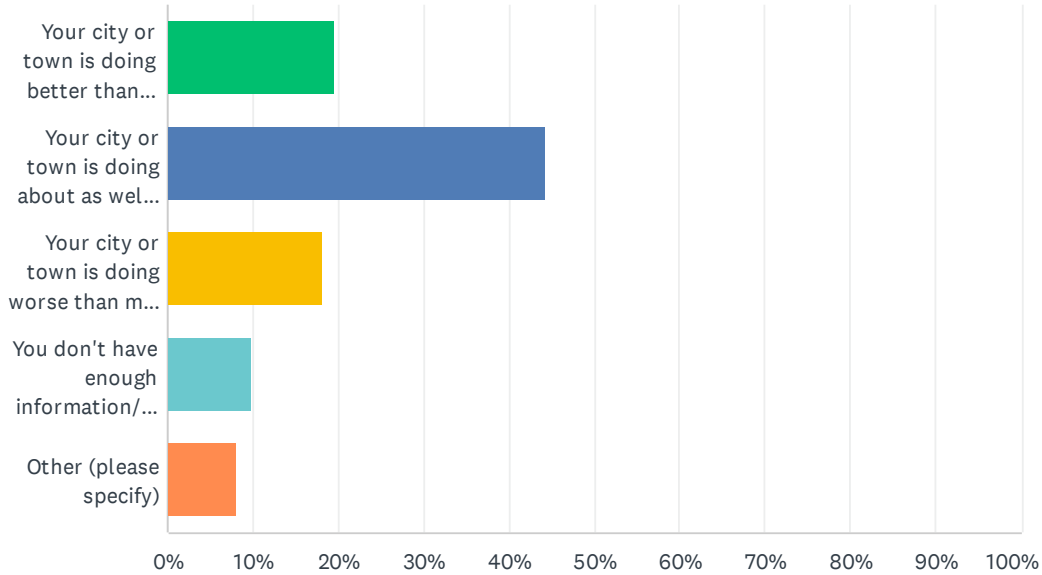
Consolidated Plan Survey

actually had housing assistance knows this. It's next to impossible to get out of. And how is making someone's rent \$50 a month when they have 0 or next to 0 income helping? It's not, it's just additional stress.

4	Investing in Housing-First models of affordable housing.	6/18/2024 8:49 PM
5	Better attitudes and true understanding of our government representatives about how MOST people live. Most are really out of touch.	6/17/2024 11:38 PM
6	funding for street outreach to help agencies work with people living outside; more shelter beds to transition people inside, and more housing first, supportive housing and permanent housing to place people	6/17/2024 7:59 AM
7	Visibility and access to services and resources. A system that works together and functions successfully and efficiently.	6/14/2024 3:36 PM
8	Assistance to local officials for (1) community planning, (2) establishment of consistent ordinances and processes related to development, and (3) outreach efforts to dispell common myths about housing (i.e. impact of affordable housing projects on municipal education budgets)	6/12/2024 12:00 PM
9	Homeless shelters currently in existence consistently have no available beds. They need funding and support in order to increase bed space, and support services like housing navigation and case management.	6/12/2024 9:48 AM
10	Sidewalks and bike lanes to connect industrial end of town with residential for safe alternative transportation	6/12/2024 7:50 AM

Q3 Regarding public infrastructure, community services and resources, and economic development in your community, which of the following is most accurate in your opinion? (select one option)

Answered: 61 Skipped: 0

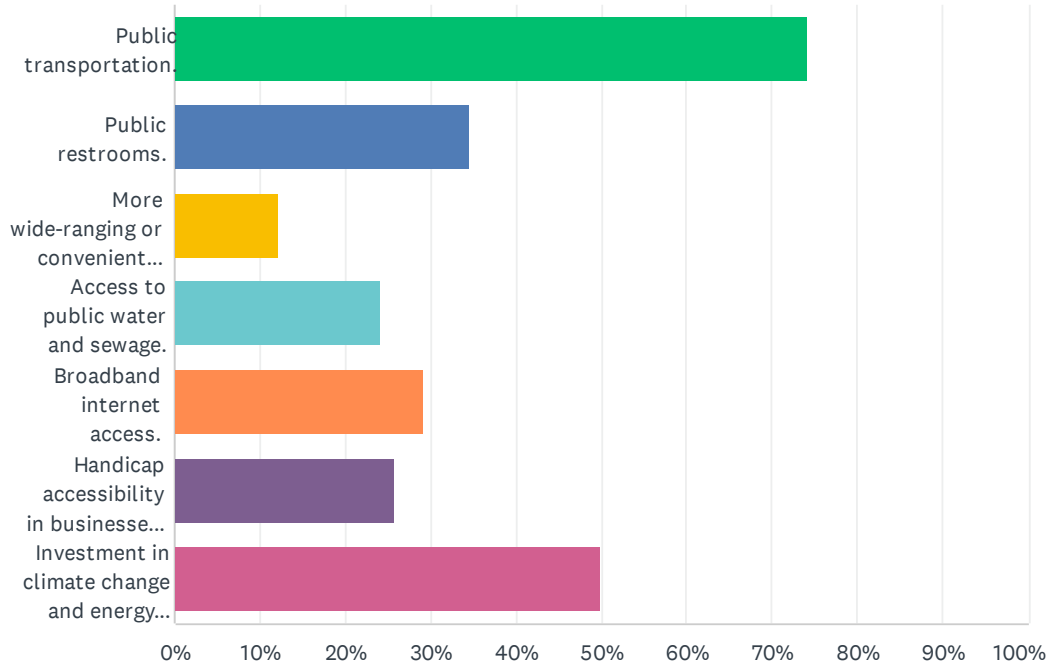


ANSWER CHOICES	RESPONSES	
Your city or town is doing better than most other cities and towns in Maine.	19.67%	12
Your city or town is doing about as well as most other cities and towns in Maine.	44.26%	27
Your city or town is doing worse than most other cities and towns in Maine.	18.03%	11
You don't have enough information/you don't have an opinion.	9.84%	6
Other (please specify)	8.20%	5
TOTAL		61

#	OTHER (PLEASE SPECIFY)	DATE
1	The economy in our town limits work opportunities to low-income wages and it is necessary to work outside of town to earn wages that can support a family.	7/2/2024 10:16 AM
2	The bus system here is a joke. People are expected to work. Vehicle expense isn't considered a necessity, but how are you supposed to get anywhere with a bus that's runs very limited hours a day and not 7 days a week. Not to mention having set stops is making it harder for disabled people	7/1/2024 11:36 AM
3	Economic development seems to focus on helping only the privileged communities.	6/18/2024 8:49 PM
4	The town does not have enough resources to provide more services or pursue economic development. It is a traditional bedroom community that has increased 2nd home buyer pressures making it impossible to afford a home passed on the service center jobs in the region.	6/13/2024 3:45 PM
5	Knox Clinic is coming into our town but there is still a severe lack of affordable housing in all of	6/12/2024 7:50 AM

Q4 Regarding public infrastructure, which of the following are most needed in your community? (select up to three options)

Answered: 58 Skipped: 3



ANSWER CHOICES	RESPONSES	
Public transportation.	74.14%	43
Public restrooms.	34.48%	20
More wide-ranging or convenient trash pickup and recycling services.	12.07%	7
Access to public water and sewage.	24.14%	14
Broadband internet access.	29.31%	17
Handicap accessibility in businesses and public spaces.	25.86%	15
Investment in climate change and energy efficiency.	50.00%	29
Total Respondents: 58		

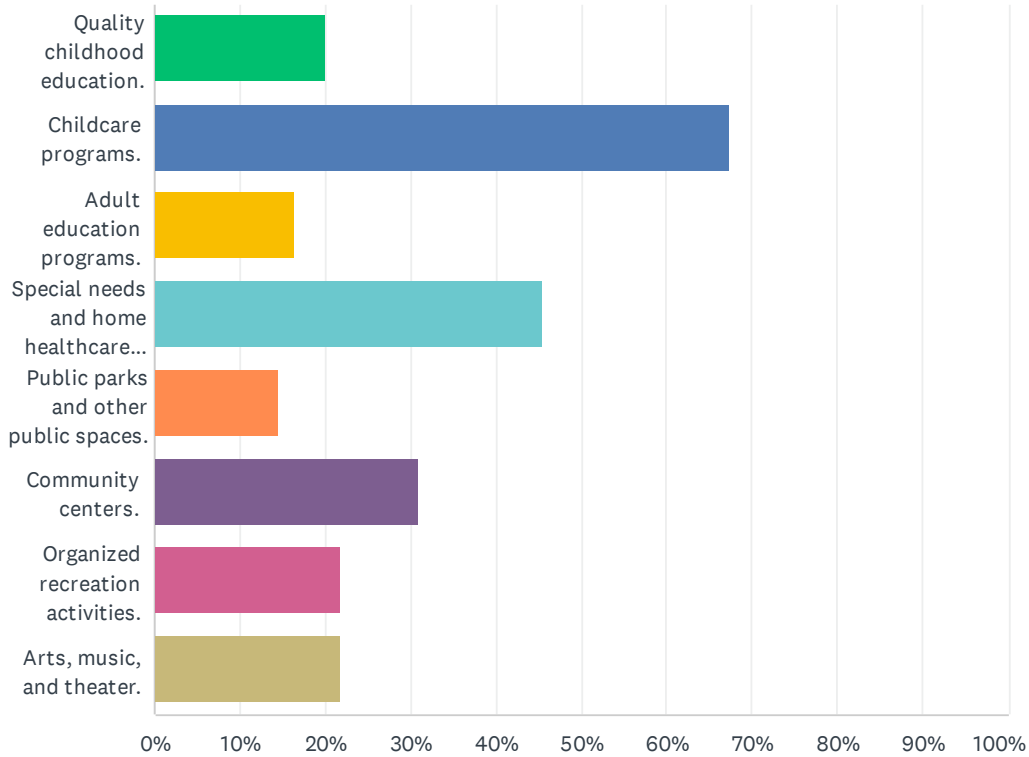
#	OTHER (PLEASE SPECIFY)	DATE
1	Roads that aren't full of potholes, shoulders on the roads, more sidewalks.	7/15/2024 12:20 PM
2	Rail trail NOW. portland to auburn.	6/29/2024 10:19 PM
3	More sidewalks, crosswalks and other pedestrian tools. Most especially near and into big shopping centers. Not everyone drives.	6/18/2024 8:49 PM
4	Our streets and sidewalks are in poor condition and are very difficult for people living with disability to navigate.	6/18/2024 9:30 AM
5	Even though we have public transit transportation it needs to be expanded hours	6/17/2024 7:59 AM

Consolidated Plan Survey

6	Access and visibility to services and services that coordinate. Education and proper development on all system levels.	6/14/2024 3:36 PM
---	--	-------------------

Q5 Regarding community services and resources, which of the following are most needed in your community? (select up to three options)

Answered: 55 Skipped: 6



ANSWER CHOICES	RESPONSES
Quality childhood education.	20.00% 11
Childcare programs.	67.27% 37
Adult education programs.	16.36% 9
Special needs and home healthcare services.	45.45% 25
Public parks and other public spaces.	14.55% 8
Community centers.	30.91% 17
Organized recreation activities.	21.82% 12
Arts, music, and theater.	21.82% 12
Total Respondents: 55	

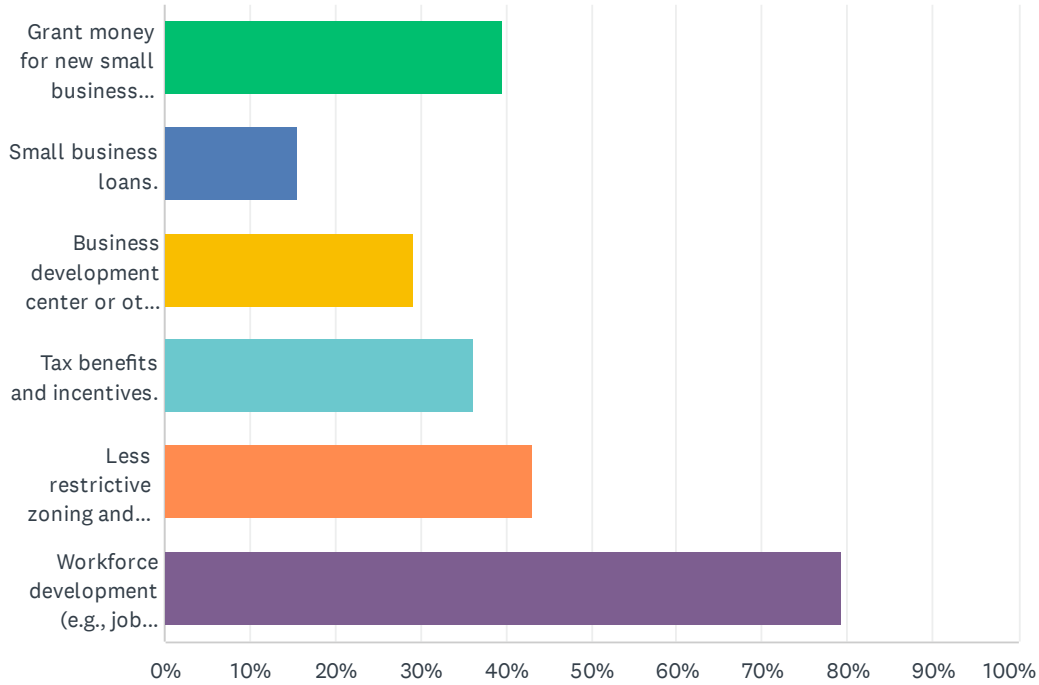
#	OTHER (PLEASE SPECIFY)	DATE
1	Assisted living facilities for the elderly	7/11/2024 9:57 AM
2	Middle school and teen centers	7/8/2024 3:19 PM
3	Rental assistance	6/29/2024 10:19 PM

Consolidated Plan Survey

4	Our schools are under-funded because we are a low-income community and we don't receive enough support from the state.	6/18/2024 9:30 AM
5	Education, mental health services	6/14/2024 3:36 PM
6	I don't really know.	6/14/2024 11:38 AM
7	Mental health supports above all else	6/12/2024 7:50 AM

Q6 Regarding economic development, which of the following are most needed in your community? (select up to three options)

Answered: 58 Skipped: 3

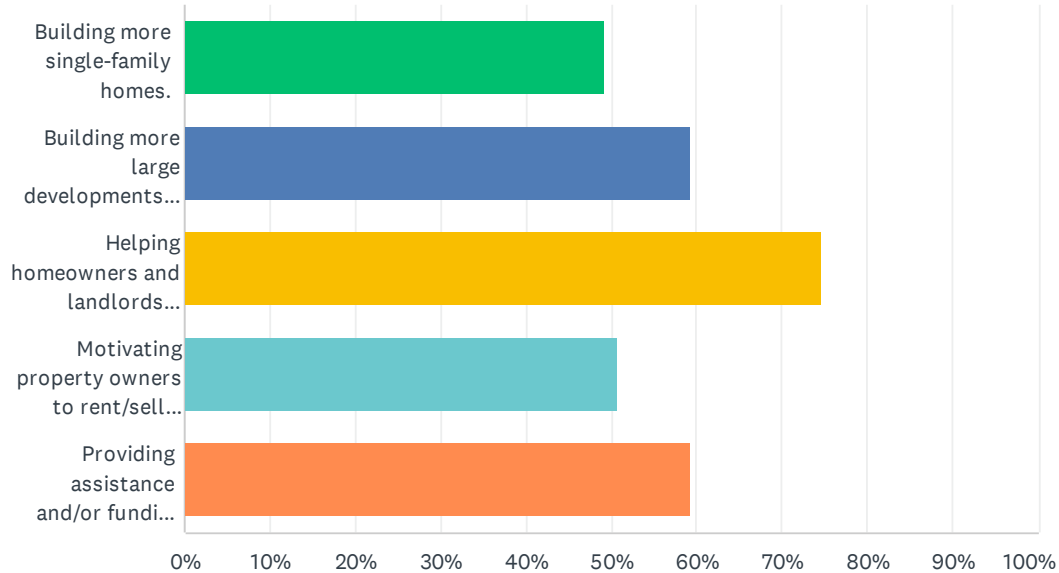


ANSWER CHOICES	RESPONSES	
Grant money for new small business ventures.	39.66%	23
Small business loans.	15.52%	9
Business development center or other technical assistance for small businesses.	29.31%	17
Tax benefits and incentives.	36.21%	21
Less restrictive zoning and town/city/government requirements.	43.10%	25
Workforce development (e.g., job training, apprenticeships, childcare supports, etc.).	79.31%	46
Total Respondents: 58		

#	OTHER (PLEASE SPECIFY)	DATE
1	not sure	7/8/2024 2:09 PM
2	Did I mention ZONING!	6/29/2024 10:19 PM
3	Economic development should focus on strengthening and building our small businesses.	6/18/2024 8:49 PM
4	Living wage and incentive to work	6/14/2024 3:36 PM
5	Incentives to occupy Main Street, empty store fronts	6/12/2024 7:50 AM

Q7 Regarding housing priorities, which of the following do you think is most important? (select all that apply)

Answered: 59 Skipped: 2



ANSWER CHOICES	RESPONSES
Building more single-family homes.	49.15% 29
Building more large developments with many housing units.	59.32% 35
Helping homeowners and landlords preserve and update existing housing.	74.58% 44
Motivating property owners to rent/sell vacant housing by creating incentives and/or penalties.	50.85% 30
Providing assistance and/or funding for property owners to create additional housing units on the same lot as their home.	59.32% 35
Total Respondents: 59	

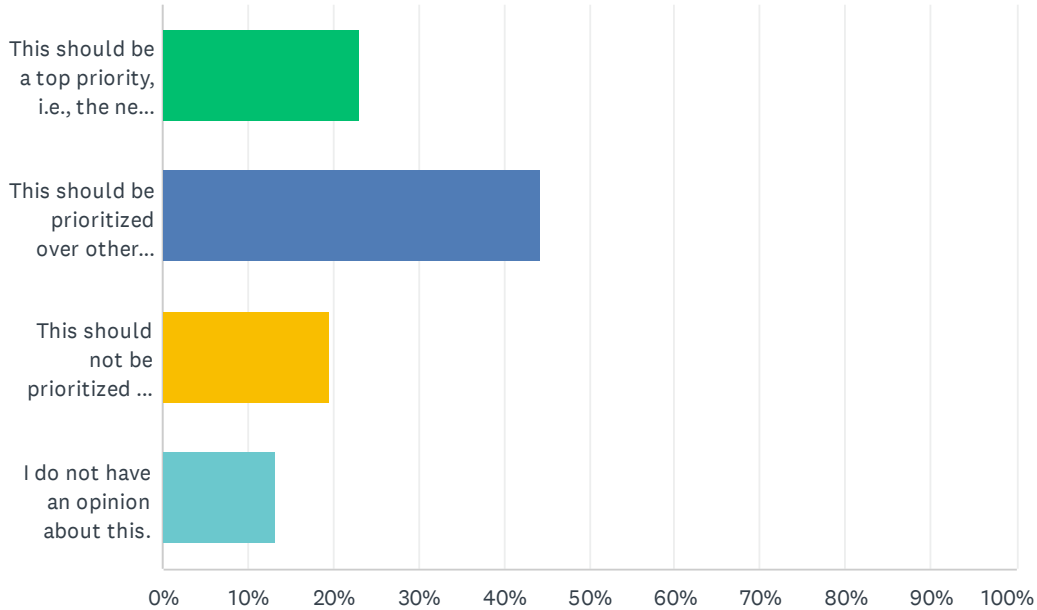
#	OTHER (PLEASE SPECIFY)	DATE
1	Building more medium size developments, with 3-15 units.	7/15/2024 12:20 PM
2	Housing that integrates diversity, affordability, and market rate housing, and not allowing builders to only build big expensive and exclusive housing in an area without affordable housing.	7/14/2024 8:38 PM
3	Create zoning against leaving housing empty or using housing as indoor marijuana grow sites.	7/11/2024 9:57 AM
4	Helping non-profit, community focused organizations buy existing housing to take it out of the open market and operate it for the public good.	7/11/2024 8:59 AM
5	Create more affordable housing and make it less difficult to get into housing in general	7/1/2024 10:02 PM
6	New construction of two-unit properties, where one unit is owner-occupied and the other provides rental income to help offset the owner's monthly mortgage.	7/1/2024 2:08 PM
7	More ADA accessible housing both new construction and home modifications/perseveration of	7/1/2024 1:58 PM

Consolidated Plan Survey

	existing affordable housing.	
8	What this doesn't address are the out of state investors buying up property to rent. In the tight market, rents are escalating and it removes single family homeownership opportunities.	7/1/2024 12:54 PM
9	A lot of what people can and can't do personally or professionally depend on credit scores. This holds a lot of people back in a lot of ways. There should be home loans and down payment assistance for realistic people with realistic credit scores	7/1/2024 11:36 AM
10	Affordable apartments for rent.	6/29/2024 10:19 PM
11	All housing priorities should start from the bottom, at the neediest levels. Most new "affordable" housing is far from affordable.	6/18/2024 8:49 PM
12	Funding affordable housing options for renters and home owners (as MaineHousing is already doing! ... continuing to staff up to meet developer interest, community capacity, and availability of resources)	6/18/2024 11:03 AM
13	We have a very low vacancy rate for housing, but we do have many vacant businesses, and it might be good to apply pressure to those entities to redevelop or sell. Some of it might convert to housing as a result.	6/18/2024 9:30 AM
14	I think building more housing units for the area not necessarily large. This could be several smaller buildings within a lot or duplexes so that children can live next door to elderly parents to assist in care of either grandkids or elderly.	6/18/2024 8:11 AM
15	Funding for creation of extra housing units on private property aids in upward mobility only for those who were not shut out of the market during the pandemic. How about funding people who have large down payments who cannot break into the market because of the workings of the market during the pandemic? Large developments with HOA's are the problem. Mobile home parks where people get to own their individual lots...how about that? Condo developers and Mobile Home Park developers are getting much more than the folks who own their homes...at the peoples' expense. Our government has handed these folks a huge opportunity at the expense of the average folks. Time to subsidize average folk. Some 2.5% loans for non-corporate buyers with 50% down would go a long way.	6/17/2024 11:38 PM
16	A cap on the number of properties owned by out-of-state developers and a ban on AirBnB	6/17/2024 10:56 AM
17	Identify, coordinate and adequately fund current services and programs.	6/14/2024 3:36 PM
18	Guidance to municipalities about the housing continuum, municipal resources to increase housing development, resources to help develop right-sized housing so community members can age in place. Recognition that often infrastructure is the barrier to development and resources to eliminate that barrier.	6/12/2024 12:00 PM

Q8 Regarding housing priorities, how much priority do you think should be given to creating more supportive housing options for those with special needs?

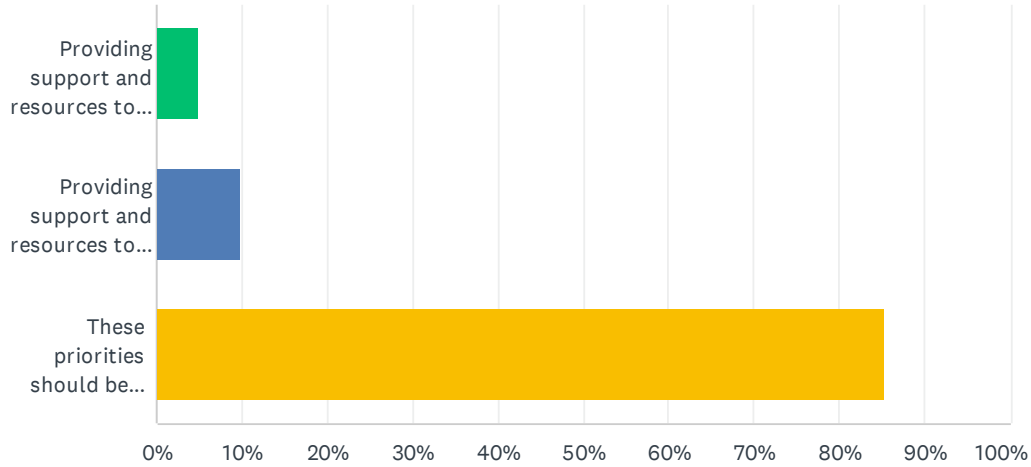
Answered: 61 Skipped: 0



ANSWER CHOICES	RESPONSES	
This should be a top priority, i.e., the need is urgent.	22.95%	14
This should be prioritized over other housing but only in cases where supportive housing in the area is unavailable.	44.26%	27
This should not be prioritized any more than any other type of housing.	19.67%	12
I do not have an opinion about this.	13.11%	8
TOTAL		61

Q9 To address homelessness in Maine, which of the following do you think should be the greater proirity?

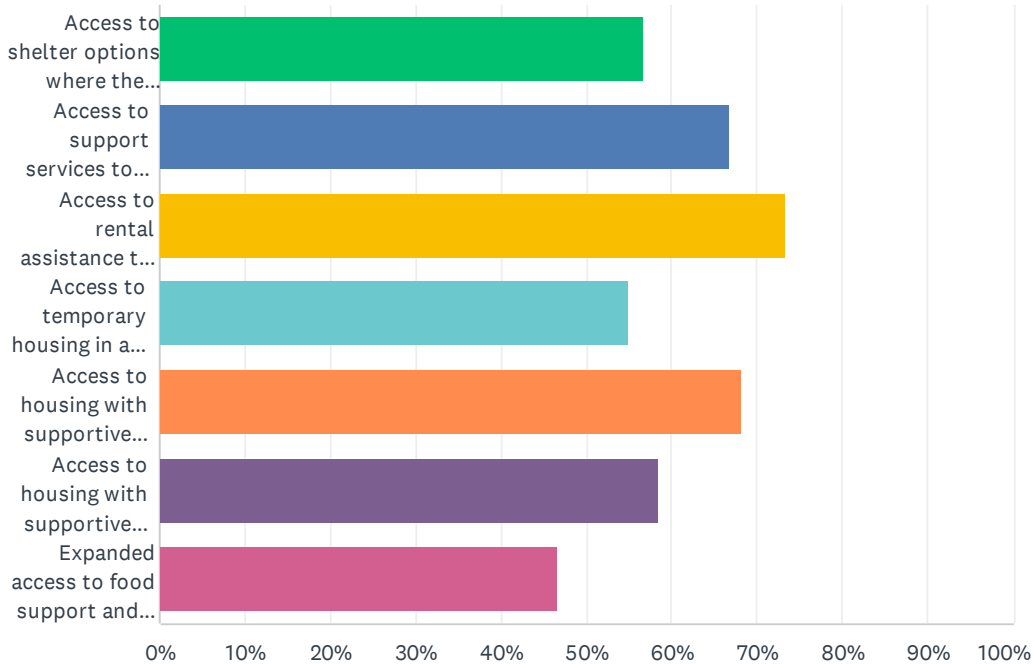
Answered: 61 Skipped: 0



ANSWER CHOICES	RESPONSES	
Providing support and resources to those that are currently experiencing homelessness.	4.92%	3
Providing support and resources to those in immediate danger of losing their home.	9.84%	6
These priorities should be treated equally.	85.25%	52
TOTAL		61

Q10 To address homelessness in Maine, which of the following do you think is most important in your community? (select all that apply)

Answered: 60 Skipped: 1



ANSWER CHOICES	RESPONSES
Access to shelter options where the requirements for entry are easily met.	56.67% 34
Access to support services to find housing for those who have lost their home or are currently experiencing homelessness.	66.67% 40
Access to rental assistance to make housing affordable for those who are experiencing homelessness.	73.33% 44
Access to temporary housing in a private unit for those experiencing homelessness to help them move to a permanent housing option.	55.00% 33
Access to housing with supportive services for those with a history of substance use, mental health, or behavioral disorders.	68.33% 41
Access to housing with supportive services for those with other special needs.	58.33% 35
Expanded access to food support and other supportive services within the community, such as food banks and warming shelters.	46.67% 28
Total Respondents: 60	

#	OTHER (PLEASE SPECIFY)	DATE
1	Even people without special needs that have been truly homeless do not know how to live in an apartment building and need additional support. It should not be up to the landlords to deal with all these social concerns. Maybe we shouldn't have closed our group homes and mental health institutions.	7/11/2024 9:57 AM
2	Require shelters in every county. The service centers across the State are utilized by many as	7/1/2024 12:54 PM

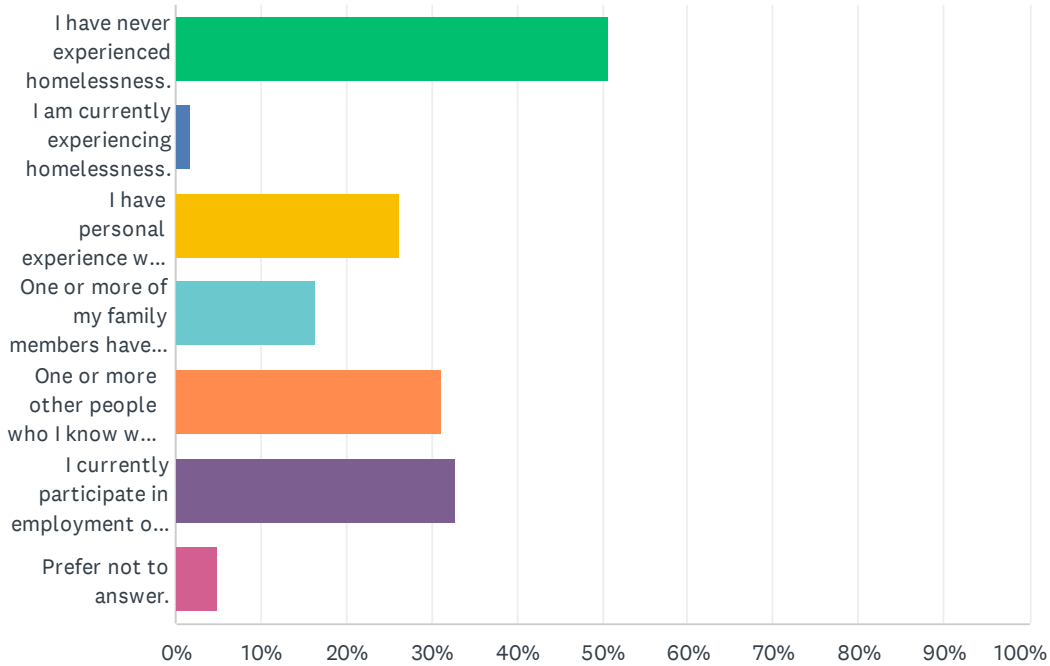
Consolidated Plan Survey

their solution for homelessness. Development for low income or supportive units should be throughout the state.

3	We should be investing in long-term housing, not temporary solutions like shelters.	6/18/2024 8:49 PM
4	Stop calling "couch surfers" "housed." They're not. They have safe space but it is not theirs. They should still be treated by social services as if they are homeless. A couch is not "home" and those providing the couches are being used by our government.	6/17/2024 11:38 PM
5	Access, coordination, and properly funded programs/systems of care	6/14/2024 3:36 PM
6	Create more housing. The only measure with a correlation between the experience of homelessness, across COCs, is the lack of available housing.	6/12/2024 12:00 PM
7	Reasonable rents	6/12/2024 9:56 AM

Q11 Which of the following describes your experience with homelessness? (select all that apply)

Answered: 61 Skipped: 0



ANSWER CHOICES	RESPONSES	
I have never experienced homelessness.	50.82%	31
I am currently experiencing homelessness.	1.64%	1
I have personal experience with homelessness in my past.	26.23%	16
One or more of my family members have experienced homelessness.	16.39%	10
One or more other people who I know well have experienced homelessness	31.15%	19
I currently participate in employment or volunteer activities to provide direct support to people experiencing homelessness.	32.79%	20
Prefer not to answer.	4.92%	3
Total Respondents: 61		

Q1 Enter your current, or most recent, residential zip code.

Answered: 97 Skipped: 0

#	RESPONSES	DATE
1	04627	7/15/2024 12:08 PM
2	04901	7/15/2024 9:14 AM
3	04072	7/14/2024 8:27 PM
4	04106	7/12/2024 7:18 PM
5	04092	7/12/2024 1:20 PM
6	04073	7/11/2024 1:17 PM
7	04276	7/11/2024 9:38 AM
8	04342	7/11/2024 6:03 AM
9	04101	7/10/2024 5:58 PM
10	04660	7/10/2024 4:11 PM
11	04530	7/10/2024 4:09 PM
12	04609	7/10/2024 7:54 AM
13	04354	7/9/2024 9:45 AM
14	04605	7/9/2024 6:39 AM
15	04101	7/8/2024 4:02 PM
16	04103	7/8/2024 3:22 PM
17	Mary Hastings 04002	7/8/2024 3:14 PM
18	04901	7/8/2024 2:05 PM
19	04073	7/8/2024 1:14 PM
20	04073	7/8/2024 12:23 PM
21	04073	7/8/2024 12:21 PM
22	04901	7/8/2024 12:07 PM
23	04102	7/8/2024 11:57 AM
24	04101	7/8/2024 11:42 AM
25	04988	7/7/2024 7:35 AM
26	04330	7/6/2024 6:58 PM
27	04901	7/4/2024 3:50 AM
28	04210	7/3/2024 6:43 AM
29	04106	7/2/2024 12:05 PM
30	04240	7/2/2024 11:20 AM
31	04254	7/2/2024 9:09 AM
32	04240	7/2/2024 8:30 AM
33	04864	7/2/2024 8:00 AM

Fair Housing Survey

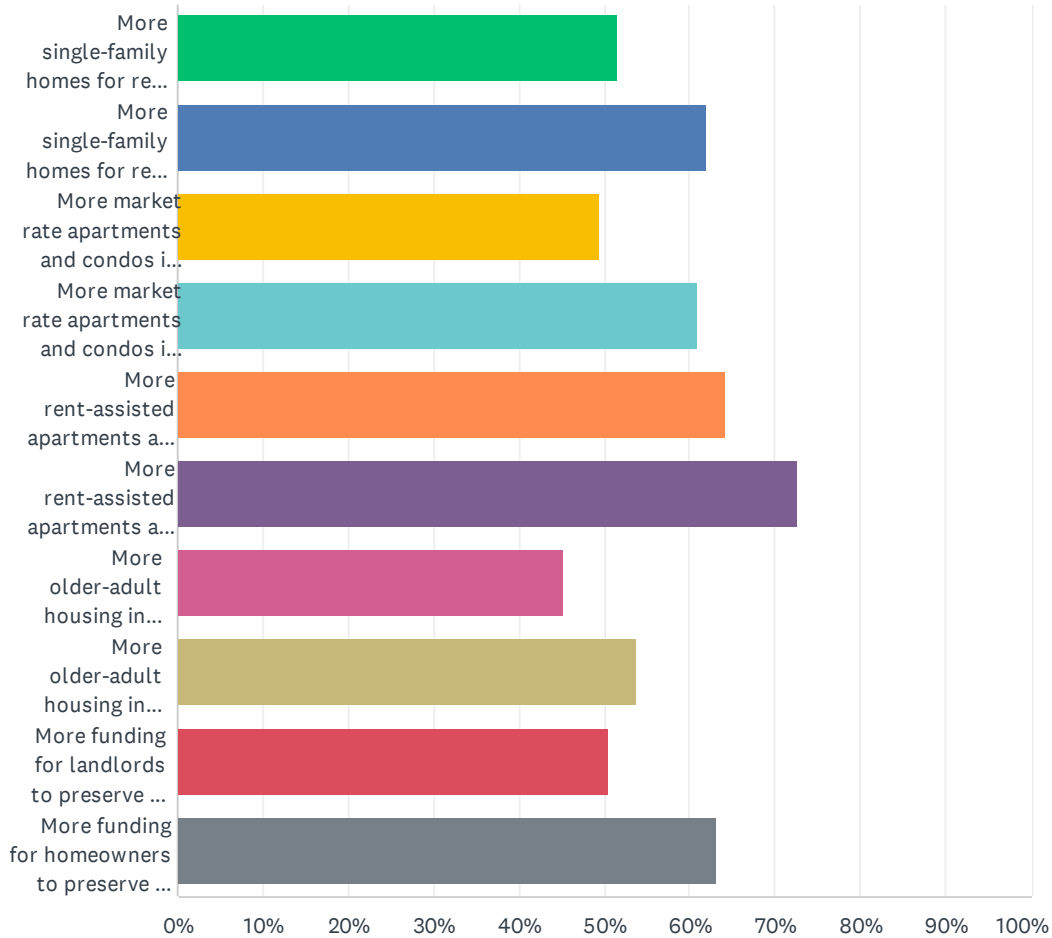
34	04240	7/1/2024 9:57 PM
35	04032	7/1/2024 7:26 PM
36	04605	7/1/2024 6:02 PM
37	04039	7/1/2024 5:46 PM
38	04103	7/1/2024 2:57 PM
39	04333	7/1/2024 1:51 PM
40	04401	7/1/2024 12:47 PM
41	04257	7/1/2024 12:00 PM
42	04102	7/1/2024 11:57 AM
43	04074	7/1/2024 11:18 AM
44	04096	6/29/2024 10:08 PM
45	03909	6/28/2024 8:47 AM
46	04472	6/27/2024 5:16 PM
47	04330	6/27/2024 12:37 AM
48	04937	6/23/2024 3:39 PM
49	04210	6/21/2024 3:31 AM
50	04252	6/19/2024 8:57 PM
51	03901	6/19/2024 7:29 PM
52	04736	6/18/2024 7:58 PM
53	04537	6/18/2024 4:49 PM
54	04250	6/18/2024 1:23 PM
55	04401	6/18/2024 11:38 AM
56	04043	6/18/2024 11:22 AM
57	04579	6/18/2024 10:59 AM
58	04444	6/18/2024 9:53 AM
59	04097	6/18/2024 9:37 AM
60	04011	6/17/2024 11:23 PM
61	04011	6/17/2024 9:16 PM
62	04011	6/17/2024 8:06 PM
63	04011	6/17/2024 4:33 PM
64	04011	6/17/2024 2:35 PM
65	04011	6/17/2024 1:31 PM
66	04841	6/17/2024 12:30 PM
67	04073	6/17/2024 11:28 AM
68	04252	6/17/2024 11:27 AM
69	04011	6/17/2024 10:07 AM
70	04011	6/17/2024 10:00 AM
71	04011	6/17/2024 9:43 AM

Fair Housing Survey

72	04079	6/17/2024 9:43 AM
73	04011	6/17/2024 9:21 AM
74	04011	6/17/2024 9:07 AM
75	04102	6/17/2024 8:50 AM
76	04086	6/17/2024 8:42 AM
77	04079	6/17/2024 7:58 AM
78	04073	6/17/2024 7:53 AM
79	04011	6/14/2024 3:29 PM
80	04103	6/14/2024 12:07 PM
81	04086	6/14/2024 11:35 AM
82	04092	6/14/2024 10:14 AM
83	04074	6/14/2024 8:41 AM
84	04086	6/14/2024 5:25 AM
85	04416	6/13/2024 7:35 AM
86	04093	6/12/2024 3:58 PM
87	4254	6/12/2024 3:29 PM
88	04284	6/12/2024 12:09 PM
89	04530	6/12/2024 11:13 AM
90	04005	6/12/2024 10:38 AM
91	04401	6/12/2024 9:39 AM
92	04429	6/12/2024 9:32 AM
93	04555	6/12/2024 9:29 AM
94	04416	6/12/2024 8:52 AM
95	04938	6/12/2024 7:50 AM
96	04861	6/11/2024 5:39 PM
97	04950	6/11/2024 5:10 PM

Q2 Research has shown that there is not enough housing in Maine to meet the current need. What do you think is most needed to make sure everyone has access to housing in Maine? (select all that apply)

Answered: 95 Skipped: 2



Fair Housing Survey

ANSWER CHOICES	RESPONSES	
More single-family homes for rent or sale in larger cities/towns.	51.58%	49
More single-family homes for rent or sale in smaller cities/towns.	62.11%	59
More market rate apartments and condos in larger cities/towns.	49.47%	47
More market rate apartments and condos in smaller cities/towns.	61.05%	58
More rent-assisted apartments and condos in larger cities/towns.	64.21%	61
More rent-assisted apartments and condos in smaller cities/towns.	72.63%	69
More older-adult housing in larger cities/towns.	45.26%	43
More older-adult housing in smaller cities/towns.	53.68%	51
More funding for landlords to preserve and improve existing housing.	50.53%	48
More funding for homeowners to preserve and improve their homes (including making them suitable to the needs of older adults).	63.16%	60
Total Respondents: 95		

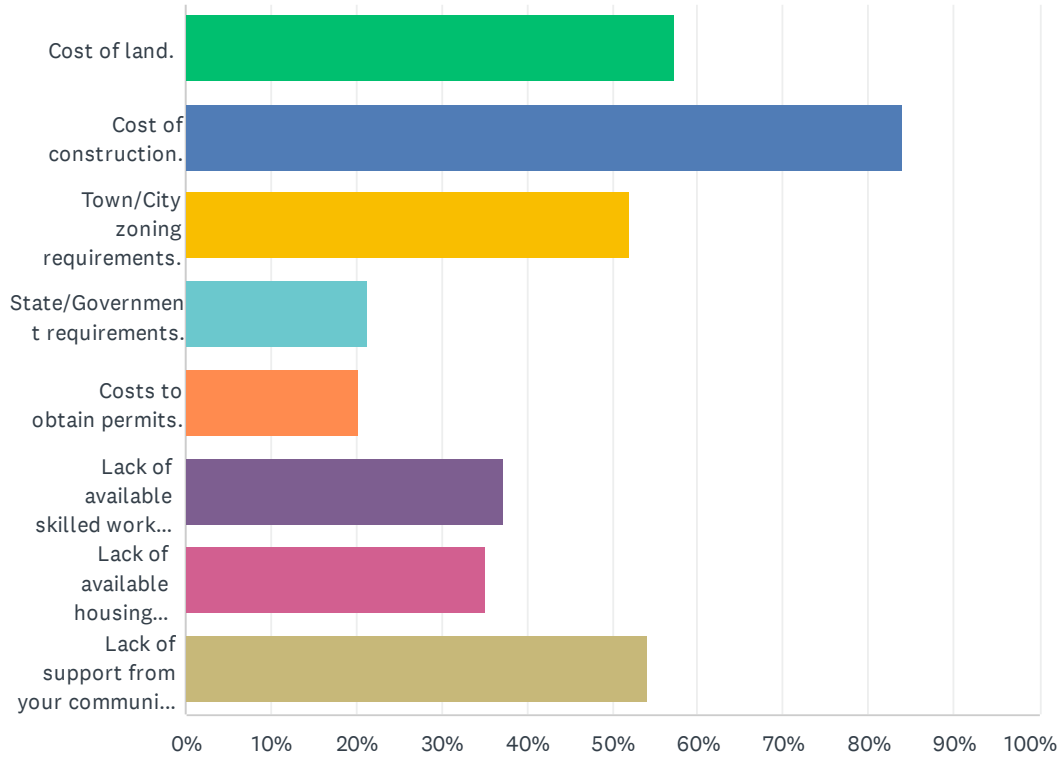
#	OTHER (PLEASE SPECIFY)	DATE
1	Market rate to fall back under 1000k for a one bedroom. It's unrealistic for a lot of people.	7/15/2024 9:14 AM
2	Incentives for builders and manufacturers to build affordably to net zero energy standards and with a significant percentage of Maine/New England forest products.	7/10/2024 4:11 PM
3	More multi-family homes in cities/small towns; zoning ordinance changes to allow for multi-family units/multiple dwelling units per lot; more public transportation from small towns/rural areas to larger towns and cities	7/9/2024 9:45 AM
4	All housing is needed, but helping people afford rents is crucial. Market rates have become very difficult for those who don't have high incomes, but also don't qualify for most of the rent subsidized units	7/8/2024 2:05 PM
5	More support resources for amateur investment owners with limited rental property experience and skills. Starting with a realistic expectation of responsibilities, a business operation plan with a pro-forma and capital improvement strategy, to effective tenant relations with a focus on protecting their investment while fostering good tenants.	7/2/2024 9:09 AM
6	More affordable housing for single parents and assistance in maintaining them.	7/1/2024 9:57 PM
7	Plans/programs need to be comprehensive and across the boards.	7/1/2024 6:02 PM
8	More rent assisted housing built with universal design for individuals with disabilities- to include developmental disabilities, autism and TBI.	7/1/2024 1:51 PM
9	Need for "missing middle" single family home ownership opportunities as well as rental - when using AMI - the programs are more feasible in one community than another - as affordable definition varies greatly by zip	7/1/2024 12:47 PM
10	More large family housing with 4-5 bedrooms for families that live together, such as parents and grandparents and children helping each other.	7/1/2024 12:00 PM
11	We especially need more stable rent assisted housing. Over the past few years my rent has been raised significantly every year. My Social Security has not. It's getting harder and harder for me to eat good meals, put gas in the car to get to Dr. appointments, or afford cleaning supplies. At 80 I can't afford to live anymore.	6/27/2024 12:37 AM
12	More apartments for young adults with limited mobility	6/19/2024 8:57 PM
13	More shelters for the homeless.	6/19/2024 7:29 PM
14	Prohibitions on foreign-firm owned real estate purchases, benefits for owner-occupied units,	6/18/2024 1:23 PM

Fair Housing Survey

	restrictions on Air BnBs.	
15	Subsidy programs (continued/increased - and with ample development cost and sale caps) to help affordable housing options pencil out in the current construction and market environment	6/18/2024 10:59 AM
16	support for first time homebuyers	6/18/2024 9:37 AM
17	Affordability, based on Maines current minimum wage.	6/17/2024 9:16 PM
18	More affordable renting options everywhere	6/17/2024 8:06 PM
19	Mass Deportation	6/17/2024 9:43 AM
20	Not allowing landlords to refuse housing vouchers.	6/17/2024 9:43 AM
21	Accessible housing for people with disabilities, not just for the older adults	6/17/2024 8:42 AM
22	More funding for housing rent assitance.	6/17/2024 7:58 AM
23	Development of a public statewide comprehensive list of resources, providers, services and landlords/property management who will accept vouchers (and work with/willingness to work with programs) would provide visibility, access to, coordination, standardization, streamlining, process improvement, and successful utilization of services/housing and provide an accurate scope of what is available and where the true needs are. This data, information, education and visibility would allow these systems to actually coordinate for the first time and utilize available services appropriately and efficiently. This gives programs the opportunity to actually develop, have the same standards and procedures to then function successfully. This not only houses people more quickly, this would give them the opportunity to access available resources to develop the skills to stay housed. Having a free for all in the state and throwing more programs and vouchers out there has caused all system to flounder. They function alone, underdeveloped, underfunded, and in crisis. It does not work, and we cannot possibly speak to the scope of this and the need without actual data and a functioning system.	6/14/2024 3:29 PM
24	One caveat about single-family homes for rent or sale - they need to be at affordable prices!	6/14/2024 11:35 AM
25	We need policies that help facilitate the development of housing in every community.	6/12/2024 12:09 PM
26	More resources available for low-income renters obtain security deposit assistance. More assistance/relief for homeowners for the high cost of electricity and heating fuel. Increasing access to Mainecare and SNAP benefits to low-income persons so their monies can stretch farther to pay for rent/mortgages/utilities.	6/12/2024 9:39 AM
27	More supportive housing for those living with challenging mental health dx	6/12/2024 9:32 AM
28	ERA destroyed the rental market, and drove prices up all over the state. Those prices haven't come back down, so even if there are more units the real issue is the need for affordable units WITHOUT any rent assistance, as people can't wait the several years on the waitlist with nowhere to live.	6/12/2024 7:50 AM

Q3 Which of the following do you think causes the greatest difficulty to more housing being built in your community? (select all that apply)

Answered: 94 Skipped: 3



ANSWER CHOICES	RESPONSES
Cost of land.	57.45% 54
Cost of construction.	84.04% 79
Town/City zoning requirements.	52.13% 49
State/Government requirements.	21.28% 20
Costs to obtain permits.	20.21% 19
Lack of available skilled workers and contractors.	37.23% 35
Lack of available housing developers.	35.11% 33
Lack of support from your community.	54.26% 51
Total Respondents: 94	

#	OTHER (PLEASE SPECIFY)	DATE
1	Not profitable to build housing that people can afford. Too many people buying 'investment properties' and using for short term rentals.	7/15/2024 12:08 PM
2	High utility rates	7/14/2024 8:27 PM

Fair Housing Survey

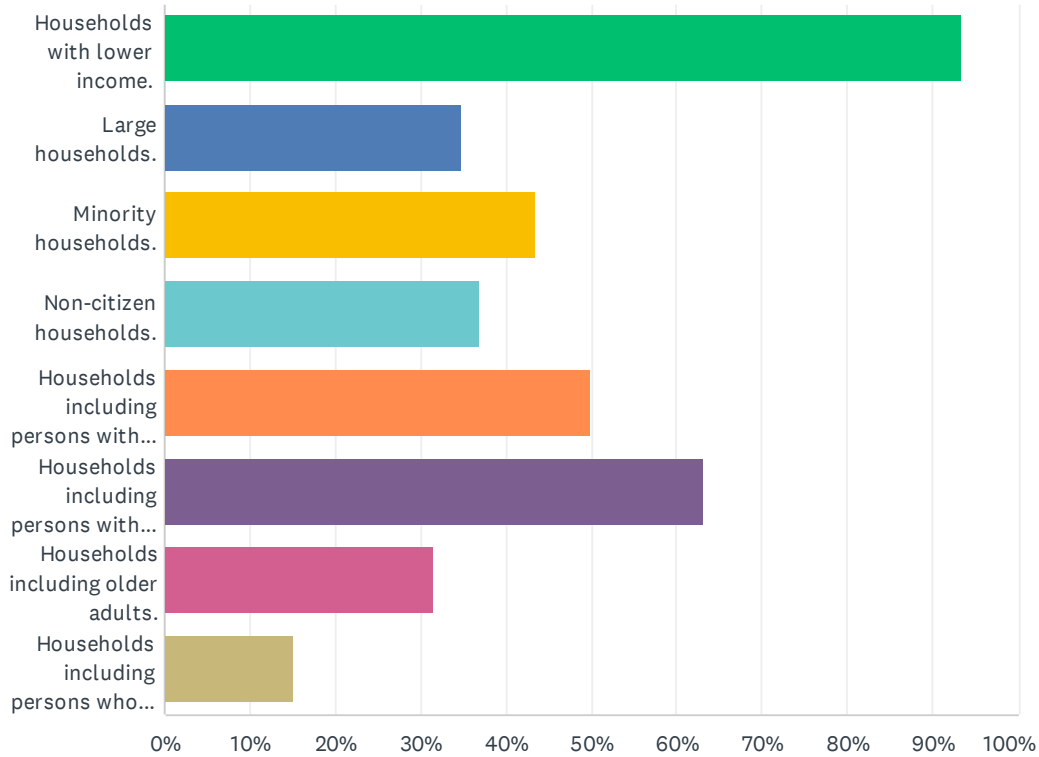
3	Seasonal home development and short-term, Air BnB-type rentals	7/10/2024 4:11 PM
4	Too much incentive to use available/new housing for short-term rentals like AirBnB; lack of understanding and stigma about housing vouchers	7/9/2024 9:45 AM
5	Developers who would rather build luxury apartments than affordable housing and they simply pay fines but the fines do not impact them in any meaningful way - so in short, they are above the law.	7/8/2024 11:57 AM
6	Difficulties in obtaining a financing mix with lower costs can break a project plan or make it more viable. This is especially true for small investment property owners.	7/2/2024 9:09 AM
7	Price of housing vs market rents and sec 8 limits do not match. Only old rundown lead filled apartments take sec 8	7/1/2024 12:00 PM
8	I'm unsure	7/1/2024 11:57 AM
9	Stop judging all homeless as addicted lazy bumbs. They are individual people with a problem. They are homeless.	6/19/2024 7:29 PM
10	The takeover of the local market by Private Equity firms and aggressive marketing by realtors toward high income people (or more highly capitalized than locals) from other states.	6/17/2024 11:23 PM
11	Not sure	6/17/2024 2:35 PM
12	Deportation	6/17/2024 9:43 AM
13	Lack of awareness/education as to the high level of need. (Not in My Backyard)	6/17/2024 8:42 AM
14	Affordable housing stigmas	6/17/2024 7:58 AM
15	<p>Development is consolidated to the areas that are already overburdened and high taxed. Expansion and development is not happening in rural areas where it would make sense. Instead, it is continuing to be piled into the cities. Development strategies and vision lack greatly. Plans are thrown together and expected to work themselves out. There is a lack of coordination in the state regarding development and zoning standard which leaves each municipality in a scramble. Access to these units are monopolized by certain communities or programs or provider or stipulations which continues to neglect everyone else in the state of Maine and force everyone outside of that to continue function in a definite. Communities have expressed frustration with the lack of information when development is brought to their communities. It's not always clear that MaineHousing is involved or what this will look like. This causes a long term back and forth for residents to fight for justice in their own town. There is a sense of being blinded due to lack of notification in some cases and feeling railroaded by MaineHousing/development even in communities with their own housing authority and established housing rules. Communities are being told that the buildings are funded with grants so it is covered and won't be a burden on them. Residents recognize that is a lie. Grants are funded with tax dollars. When there is growth, especially this much rapid growth in specific communities, the residents are absolutely shouldering an additional tax burden at a time when taxes are unreasonable and literally forcing people out of their homes. Communities are concerned with rapid growth as they have seen that once one building is approved it turns into many more developments they do not get a voice in. This is not only a tax burden it is a resource concern. Resources are limited and there hasn't been enough discussion about how this will be addressed. There is a shortage of teachers, schools are literally closing down because there is not enough money to keep them open, this is often due to TIF regions which take money away from schools first. There is a shortage of police (the police force has to increase in number to accommodate the population growth), there is a huge lack of social workers and mental health professionals, affordable and accessible resources and extremely limited transportation options. This puts communities at a safety risk, an unmanageable education system and further tax burden that is in addition to the original tax burden to fund these grants and vouchers and state funded programs/aid. Proposals have regularly been presented that do not match the zoning ordinance, flood plans or architectural compatibility but are approved by councils. Proposals change quite often, even after approval which leaves residents confused, misled, and worried about what is actually going to be built in their neighborhood. It seems there a complete breakdown in communication and understand of all of these different pieces. Council members approving the development plans do not have a solid enough grasp to understand wha they are truly agreeing to and have expressed pressure to pass due to funding needing to be spend on development.</p>	6/14/2024 3:29 PM

Fair Housing Survey

16	The lack of available housing has been facilitated by local zoning ordinances and requirements. This has resulted in a shortage of housing stock across the state and has increasingly resulted in municipal and county budgets that can not be supported by communities.	6/12/2024 12:09 PM
17	We have very NIMBY residents in Farmington, that don't like to see anything for the poor go into town. They fought (and won) moving the homeless shelter into town.	6/12/2024 7:50 AM
18	Resistance to change by neighbors, time to implement	6/11/2024 5:39 PM

Q4 In your opinion, which types of households face the greatest challenges in accessing housing in Maine? (select all that apply)

Answered: 92 Skipped: 5



ANSWER CHOICES	RESPONSES
Households with lower income.	93.48% 86
Large households.	34.78% 32
Minority households.	43.48% 40
Non-citizen households.	36.96% 34
Households including persons with physical disabilities.	50.00% 46
Households including persons with behavioral health issues, such as substance use, social, or emotional disorders.	63.04% 58
Households including older adults.	31.52% 29
Households including persons who identify as LGBTQ+.	15.22% 14
Total Respondents: 92	

#	OTHER (PLEASE SPECIFY)	DATE
1	Middle income workers. Service industry.	7/15/2024 12:08 PM
2	Median income households.	7/10/2024 7:54 AM
3	We need to recognize ALICE households. These families need the most help. They make too	7/8/2024 3:14 PM

Fair Housing Survey

much to apply for assistance but need help to afford housing. The Federal Government needs to increase the poverty levels

4	Also middle income, because they can't afford market rate, but are above limits for subsidized units	7/8/2024 2:05 PM
5	Risk of unreliable tenants means those without a good reference or track record can only access the lowest quality housing. Developing tenants with a reasonable expectation of responsibility, maybe through a certificate or program of education outreach, could help distinguish tenants that are a better-known commodity for landlords to rent to.	7/2/2024 9:09 AM
6	Households that don't qualify for assistance but don't make enough to pay the high rents in the area.	7/2/2024 8:00 AM
7	Single parent households or those with a single income coming in	7/1/2024 9:57 PM
8	Households including persons with developmental disabilities, autism and TBI.	7/1/2024 1:51 PM
9	As lower income isn't defined difficult to answer - all face challenges - but especially those classified within the "missing middle".	7/1/2024 12:47 PM
10	Income discrimination is a big issue	7/1/2024 12:00 PM
11	Workers with median income	7/1/2024 11:18 AM
12	Young, first-time home owners and renters. Young people with entry level jobs cannot afford to live anywhere.	6/18/2024 1:23 PM
13	The elderly have enough programs and assistance. Dear lord, enough already. Focus on the younger generations.	6/18/2024 11:22 AM
14	Middle income people who had sizable down payments who were shut out of the market completely during the pandemic. 1) No job, no mortgage available 2) the market jumped and then the interest rates jumped. E.G. with 200k+ in hand I was outbid on every house I put an offer in on, even when I offered 50% more. No family population can withstand businesses with cash and no need for a building inspection. There was nothing "normal" about this. Condo conversions and apartments with no first floor full bath...where WOULD anyone put 80-90 year old parents? HUGE need for subsidized loans for those with larger down payments to buy into the \$300k+ homes. Huge need for new housing with in-law lock-outs. Huge need for Medicaid to allow for families that need to combine assets to take care of mom and dad at home without losing their home later. (Honestly, not much practical planning in that area at all.) How about government owned and subsidized mobile home parks for all those folk who have seen enormous rent hikes and loss of services but also huge real estate tax increases. Who can withstand DOUBLED expenses in 2-3 years? Sometimes folks wonder if our government is paying attention at all. Yes, there have been recent changes...too little to late sacrificed a lot of people and it will continue because...profiteering is okay? Really?	6/17/2024 11:23 PM
15	Younger people being able to find places to live	6/17/2024 8:06 PM
16	Housing for young adults. Particularly those in their 20s and 30s.	6/17/2024 10:00 AM
17	Thank you for including persons with disabilities, persons with up behavioral health issues, and LGBTQ+	6/17/2024 8:42 AM
18	Source of income discrimination needs to be addressed to allow equal housing access	6/17/2024 7:58 AM
19	Youth experiencing homelessness or unstably housed (safety/overhoused etc)	6/17/2024 7:53 AM
20	All households in Maine are facing challenges to housing. Cost of living, goods and tax increases have surpassed what is considered a living wage. People are losing their homes because working one full time job is no longer enough, elderly with fixed income are losing their homes and being forced out of communities they have lived in for decades. Residents are struggling to keep a roof over their head while facing buildings popping up that are filled with unemployed individuals utilizing vouchers they can have indefinitely. Many communities and groups of people, especially youth, are seeing that not working and getting on state assistance (vouchers and MaineCare, SNAP) is much more secure and less stress/hassle than working a job that couldn't possibly keep up with the demands of bills, cost of living, supporting these developments and more and more vouchers that are flooding the state in a system that is in crisis. When it is harder for people to keep a roof over their head because they are working, we cannot expect a stable or increase in the workforce. It's impossible to advocate or convince	6/14/2024 3:29 PM

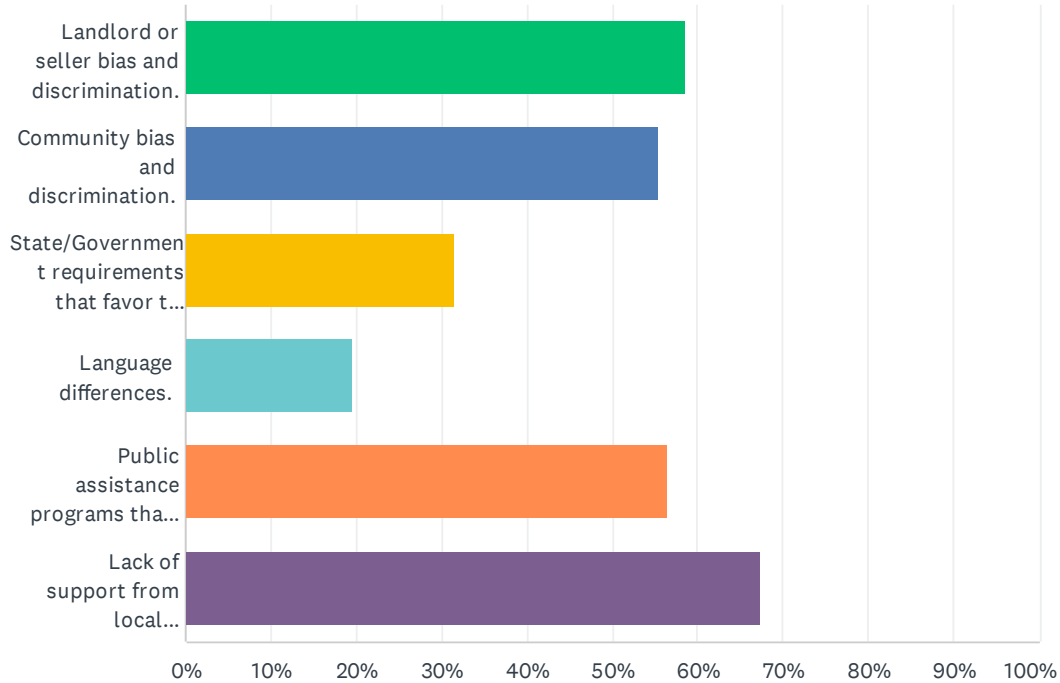
Fair Housing Survey

people to work when they will be faced with losing their full coverage state insurance, food stamps, electricity, heat and housing. Having a voucher can now be used to purchase a house. What is the incentive or desirable or reasonable backing here to expect people to continue working hard and suffering trying to do it themselves when it is less of a burden to get a voucher and work less? This is fueling a cycle of dependance and forced homelessness that needs to be addressed. Vouchers are vital to all communities; people have to be housed but we cannot be causing and perpetuating more homelessness and funding to systems that do not function or coordinate at the expense of taxpayers hard earned living and their livelihood.

21	No sub-population has escaped the impacts of the shortage of housing. Policies which disproportionately support one sub-population without a balanced response for other groups can result in increased NIMBYism. Additionally, using household income as a metric to determine eligibility for resources is an outdated modality that does not account for the increasing costs facing households such as childcare, car payments, education costs, and increased utility costs.	6/12/2024 12:09 PM
22	Homeless Families with children have been steadily increasing over the past 3 years. They are a vulnerable population that more resources should be available to help prevent homelessness.	6/12/2024 9:39 AM
23	House holds with Pets	6/12/2024 9:29 AM

Q5 In your opinion, for the households you identified in the previous question, what are the greatest difficulties for those households in accessing fair housing? (select all that apply)

Answered: 92 Skipped: 5



ANSWER CHOICES	RESPONSES
Landlord or seller bias and discrimination.	58.70% 54
Community bias and discrimination.	55.43% 51
State/Government requirements that favor the needs and preferences of other households.	31.52% 29
Language differences.	19.57% 18
Public assistance programs that do not meet the needs of the households.	56.52% 52
Lack of support from local businesses, residents, or community planners to develop housing and services needed by the households.	67.39% 62
Total Respondents: 92	

#	OTHER (PLEASE SPECIFY)	DATE
1	Landlords think they can more money and have less issues with a short term rental. People selling single family houses want to make as much money as they can off of the sale. Local incomes can't afford those prices. Salaries in urban areas go much further here. Those people then work remotely and instead of contributing to the community.	7/15/2024 12:08 PM
2	Not all people are capable to live alone and function in society at a level acceptable to a landlord. Some people require additional support. Eliminating group homes and treating all	7/11/2024 9:38 AM

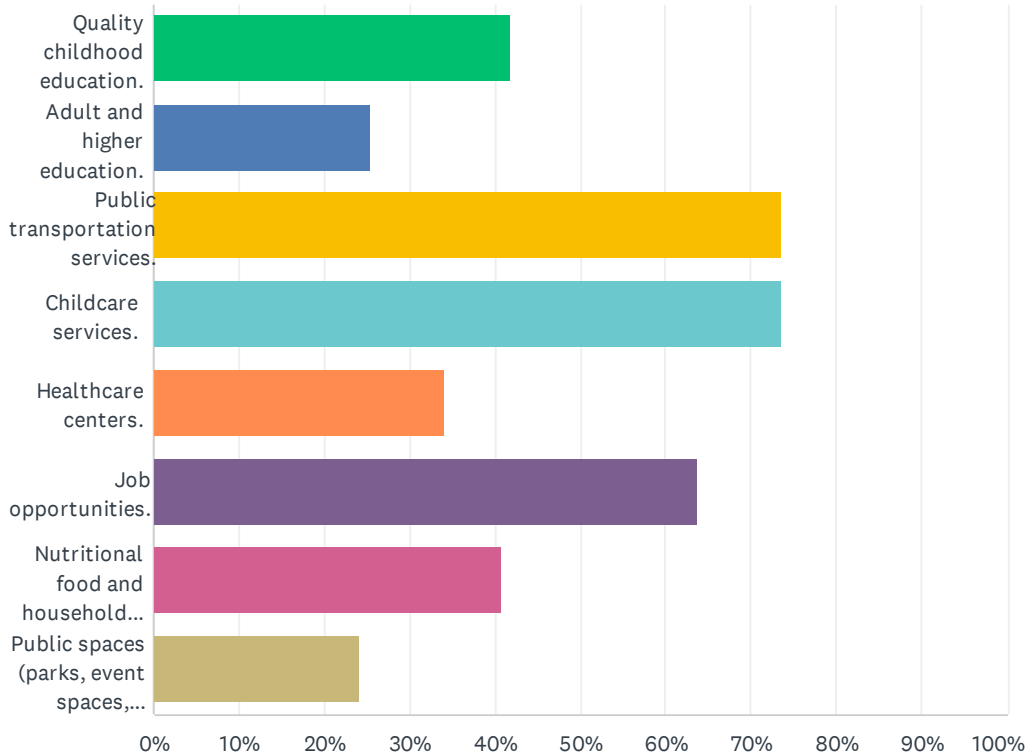
Fair Housing Survey

people the same regardless of mental or emotional capacity has caused a painful situation between landlords and tenants.

3	Simple supply and demand are pricing people out of the market.	7/11/2024 6:03 AM
4	Not enough income for the current market, but too much income for federal assistance	7/10/2024 7:54 AM
5	The State of Maine created this problem back when minimum wage and living wage were defined as the same. That made manufacturers increase their prices to be able to pay employees. The cost of goods increased, and more price increases in the B2B chain. End user is paying high costs for the goods they need. Put that together with the pandemic and the baby-boomers leaving the workforce in droves, Maine has a storm they cannot correct.	7/8/2024 3:14 PM
6	Suitability of the physical housing and having easy access to family support resources that help make that housing situation a success.	7/2/2024 9:09 AM
7	Regarding the last item, I don't think planners or businesses are the issue, so I would clarify that it is mostly residents.	7/1/2024 7:26 PM
8	NIMBY is huge for any kind of subsidized housing.	7/1/2024 6:02 PM
9	I have a 5 bedroom voucher, there are very few 5 bedrooms and the amount allowed is not realistic for the size and lack of available units. They use comps from 5 years ago...	7/1/2024 12:00 PM
10	Lack of sympathy. Community just wants to shove them out to the next town, or city.	6/19/2024 7:29 PM
11	We have a gentocracy and we need to focus on the youth. Our culture is changing.	6/18/2024 11:22 AM
12	I checked "public assistance programs that do not meet the needs of the households" for a few reasons that are likely beyond the scope of MaineHousing alone: 1) housing stock not conducive to large families or New Mainers; and 2) the larger systemic issue of benefits (HCVs, food stamps, TANF, etc.) being such a challenge to navigate relative to changing income - e.g. losing housing or benefits when increasing employment, disincentivizing savings, and individuals' shame at accessing public resources (and difficulty of navigating the system of those resources, including paternalistic approaches to doling out benefits and ensuring compliance)	6/18/2024 10:59 AM
13	My 90 year old parents who do not qualify for Medicaid have been on waiting lists for elder housing/assisted living for years and were jumped over for those with Medicaid waivers. I am on the hook for trying to provide housing, care, and work and finding a house is nearly impossible....and then there's the interest rate. Without my parents I could have afforded a house for myself, but I need a first floor bed and bath and it can't be in the sticks. EVERY home that was elderly equipped that I put offers on during the pandemic were bought by private equity or professional elder/disability providers. My loudest song right now? You let the corporations crush the middle and lower tiers, even encouraged them.	6/17/2024 11:23 PM
14	Lack of housing with subsidies based on percentage of income, not specific dollar amount for those above the limits for public assistance.	6/17/2024 2:35 PM
15	Discrimination towards people who receive assistance along with assistance wait lists that can last up to 7 years	6/17/2024 7:58 AM
16	The state does not provide access to citizens or providers to even know what services or housing is truly available, let alone coordinate or work together. Programs are underfunded and underdeveloped and functioning in crisis. This prevents the proper utilization and access to fair housing. Living wage, incentive to work and foster independence off of aid would encourage growth and a sense of investing in oneself which landlords and providers are much more willing to work with.	6/14/2024 3:29 PM
17	COST	6/14/2024 12:07 PM
18	Policies that have an unbalanced approach to supporting different populations can lead to increased resistance due to perceived preference.	6/12/2024 12:09 PM
19	affordable housing for larger families - availability	6/12/2024 9:32 AM
20	Not enough housing stock to choose from and older homes that do not meet the needs of today's inhabitant.	6/12/2024 9:29 AM
21	Income inequality	6/11/2024 5:39 PM

Q6 Which of the following services, community resources, and opportunities are less available to households that face challenges accessing housing in your community? (select all that apply)

Answered: 91 Skipped: 6



ANSWER CHOICES	RESPONSES
Quality childhood education.	41.76% 38
Adult and higher education.	25.27% 23
Public transportation services.	73.63% 67
Childcare services.	73.63% 67
Healthcare centers.	34.07% 31
Job opportunities.	63.74% 58
Nutritional food and household shopping needs.	40.66% 37
Public spaces (parks, event spaces, community centers).	24.18% 22
Total Respondents: 91	

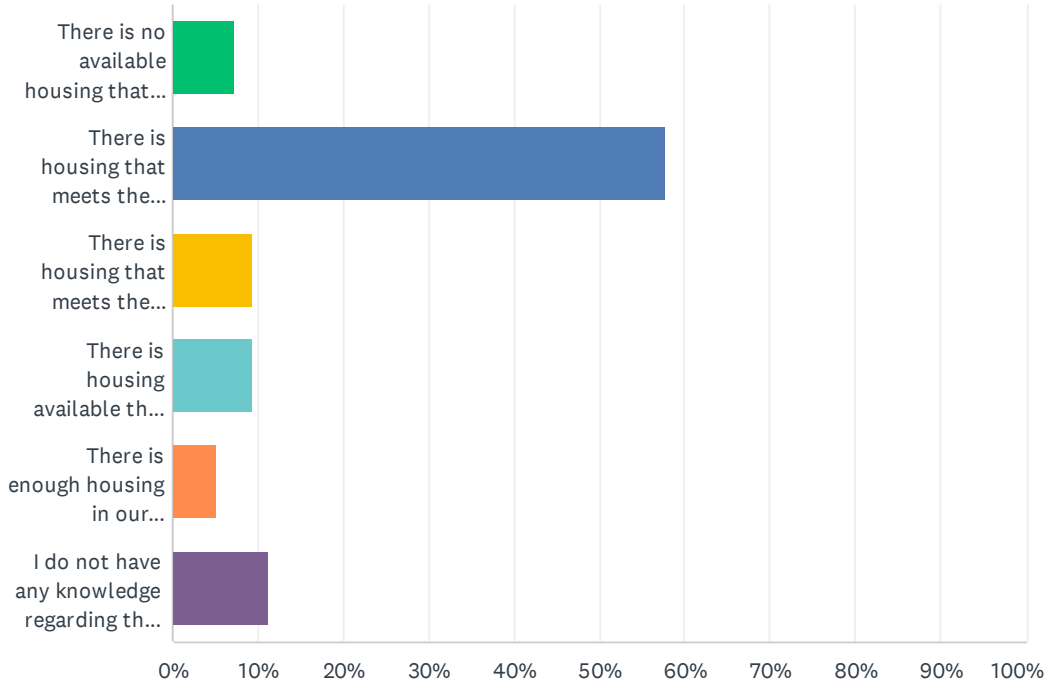
#	OTHER (PLEASE SPECIFY)	DATE
1	Direct care staffing for individuals with disabilities	7/1/2024 1:51 PM
2	The cost of childcare even under the State program requirements often makes it difficult to	7/1/2024 12:47 PM

Fair Housing Survey

	obtain and maintain employment. Most operators do not offer "off hour" - nights, weekends, etc	
3	Lack of understanding. Lack of care. Lack of understanding of what it is to be homeless.	6/19/2024 7:29 PM
4	Yes - PUBLIC SPACES. Third spaces for kids and families.	6/18/2024 11:22 AM
5	Coordinated case management (mental/physical health and barriers to access) ... dental care (expanded MaineCare benefits still not accepted by most dentists & inaccessible for people whose dental health has become a major health crisis already)	6/18/2024 10:59 AM
6	Not really sure	6/17/2024 4:33 PM
7	Their may be jobs but the pay doesn't meet a sustainable budget. ALICE (Asset Limited, Income Constrained, Employed) households are very vulnerable and living on the cusps of becoming unhoused. Lack of affordable childcare, transportation and income that meets even the basic needs of a household are key elements that keep people marginalized.	6/17/2024 7:53 AM
8	All of these services are out there and available. The problem is that people do not know about them, have no idea how to even find them and more often than not you wouldn't be able to even find out about them without having to take on a researcher's role.	6/14/2024 3:29 PM
9	adequate phone access	6/12/2024 9:32 AM

Q7 To your knowledge, how well does the housing in your community meet the needs of households with special needs, such as households that include older adults or persons with disabilities? (select one)

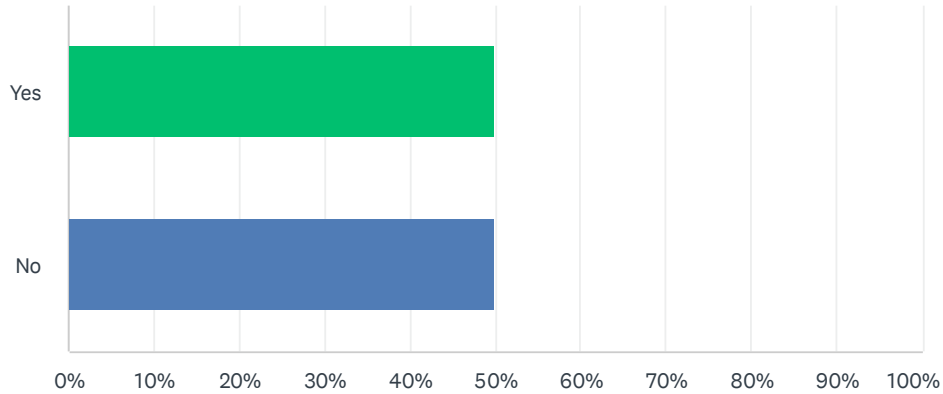
Answered: 97 Skipped: 0



ANSWER CHOICES	RESPONSES	
There is no available housing that meets the needs.	7.22%	7
There is housing that meets the needs, but there is not enough available for those who need it.	57.73%	56
There is housing that meets the needs, but it is less affordable than other housing.	9.28%	9
There is housing available that is designed to meet the needs, but it does not meet the actual needs of many in the community.	9.28%	9
There is enough housing in our community that meets the needs.	5.15%	5
I do not have any knowledge regarding this issue.	11.34%	11
TOTAL		97

Q8 In the past five years have you witnessed or experienced different treatment related to housing based on age, disability, family make-up, gender identity, race, religion, sexual orientation, source of income or any other identifying factor?

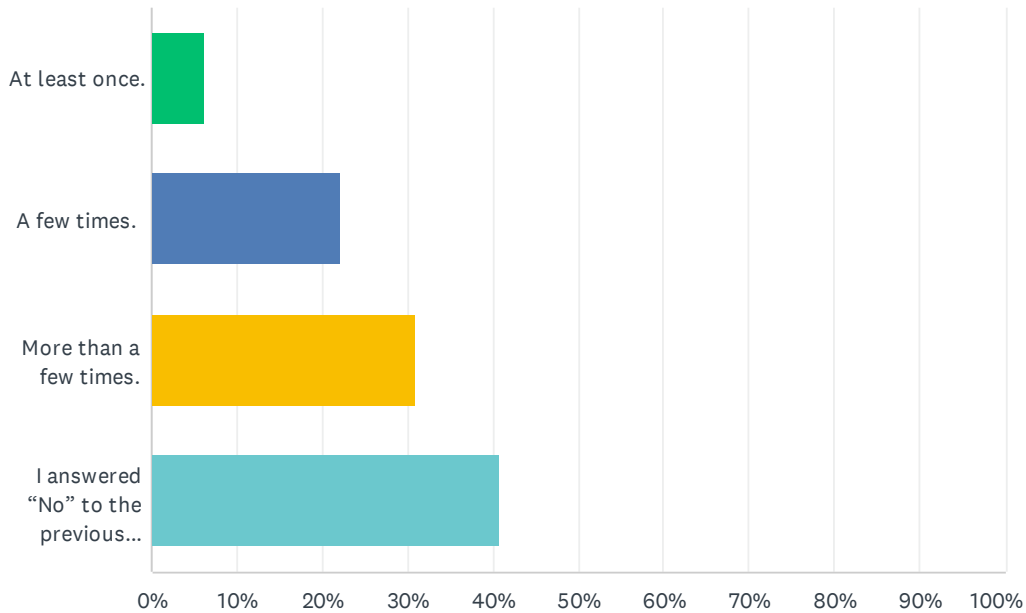
Answered: 96 Skipped: 1



ANSWER CHOICES	RESPONSES
Yes	50.00% 48
No	50.00% 48
TOTAL	96

Q9 If you answered “Yes” to the previous question, how often have you witnessed or experienced different treatment related to housing in the past five years?

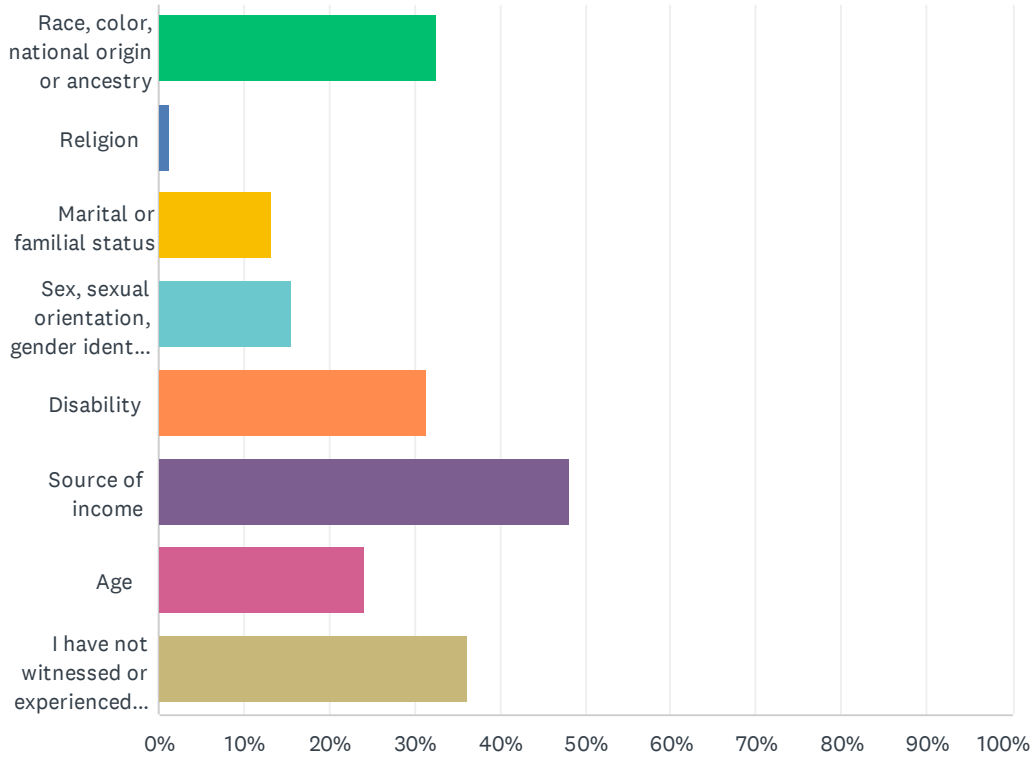
Answered: 81 Skipped: 16



ANSWER CHOICES	RESPONSES	
At least once.	6.17%	5
A few times.	22.22%	18
More than a few times.	30.86%	25
I answered “No” to the previous question.	40.74%	33
TOTAL		81

Q10 If you have witnessed or experienced different treatment related to housing what was that different treatment based on? (select all that apply)

Answered: 83 Skipped: 14



ANSWER CHOICES	RESPONSES	
Race, color, national origin or ancestry	32.53%	27
Religion	1.20%	1
Marital or familial status	13.25%	11
Sex, sexual orientation, gender identity or expression	15.66%	13
Disability	31.33%	26
Source of income	48.19%	40
Age	24.10%	20
I have not witnessed or experienced different treatment.	36.14%	30
Total Respondents: 83		

#	OTHER (PLEASE SPECIFY)	DATE
1	Income Level	7/12/2024 1:20 PM
2	low income and people who need transitional housing	7/11/2024 6:03 AM
3	Investment owners that have faced a Lead Abatement Order resolve to minimize renting to	7/2/2024 9:09 AM

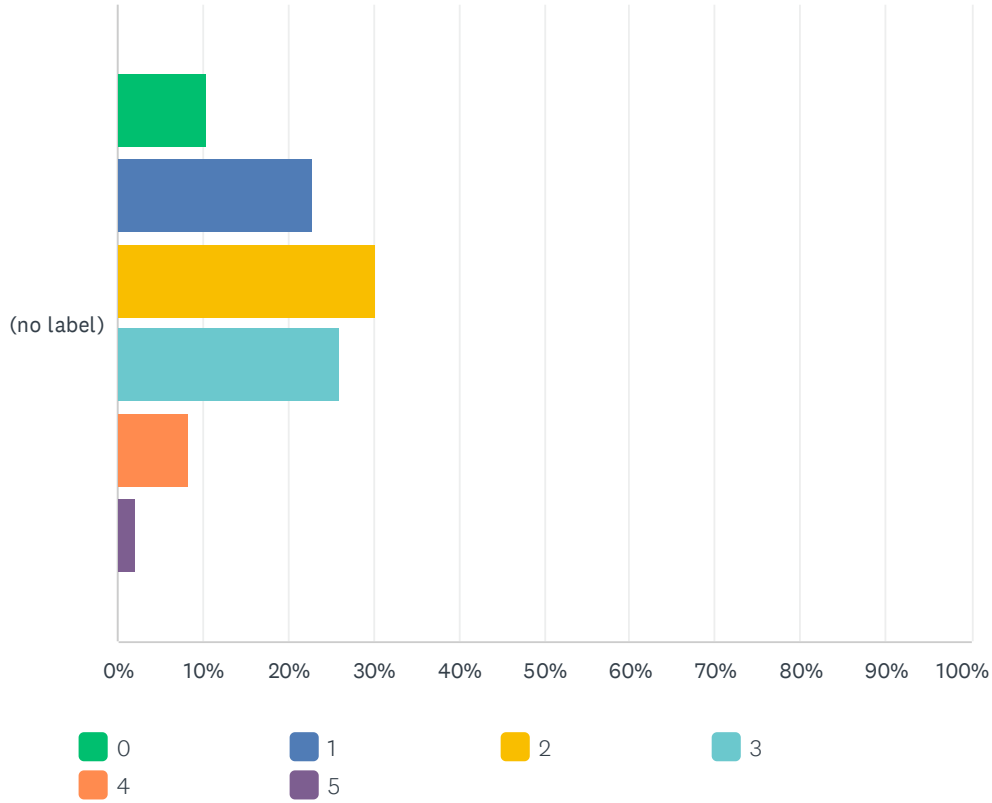
Fair Housing Survey

children in the at-risk age group, for the financial interest of the owner and the risk of the child's health.

4	Immigrant status	7/1/2024 2:57 PM
5	Use of voucher program	7/1/2024 1:51 PM
6	People using vouchers or public assistance	7/1/2024 11:18 AM
7	Lots of examples of landlords not accepting vouchers ... many, many landlords selecting more affluent candidates to rent limited number of units available ... and more subtle examples of discrimination based on language/race or perceived impact of children/families	6/18/2024 10:59 AM
8	During the pandemic, I witnessed individuals making judgement calls (by people working for government agencies) against people in areas with higher income allowances in favor of those folks from areas with lower income allowances.	6/17/2024 11:23 PM
9	source of subsidy (HCV, BRAP, Shelter + care, etc	6/17/2024 7:53 AM
10	When a person is not honest and actively refuses to put in effort that is where different treatment is seen	6/14/2024 3:29 PM
11	Too Little Income - class bias	6/14/2024 10:14 AM
12	lack of income	6/12/2024 9:32 AM

Q11 On a scale of zero to five, where zero means “not at all”, how well do you believe you and those in your community understand your rights under existing Fair Housing laws? (select one)

Answered: 96 Skipped: 1



	0	1	2	3	4	5	TOTAL	WEIGHTED AVERAGE
(no label)	10.42% 10	22.92% 22	30.21% 29	26.04% 25	8.33% 8	2.08% 2	96	3.05