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October 28, 2015

ELECTRONIC TRANSMISSION AND FEDERAL EXPRESS OVERNIGHT

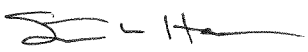
Ms. Barbara Delaney
(Barbara.R.Delaney@hud.gov)
Office of Fair Housing and Equal Opportunity
Philadelphia Center Director
100 Penn Square East - Wanamaker Building,
10th Floor
Philadelphia, PA 19107

Re: Sussex County - Revised Priority Plan

Dear Ms. Delaney:

The purpose of this correspondence is to forward to you Sussex County's revised Priority Plan ("the Revised Plan"). The Revised Plan has been revised to address the comments in HUD's correspondence to the County dated July 30, 2015, and as discussed at the County's meeting with HUD on July 16, 2015. Attached you will find a redline between the Revised Plan and the Priority Plan sent to you on December 19, 2014, along with a clean version of the Revised Plan. We welcome any comments you may have and hope to continue our cooperative dialogue.

Sincerely yours,



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Sussex County AI Evaluation and Proposed Priority Fair Housing Plan (Revised October 2015)

	AI Report	Goal	Strategies to Meet Goal	Actions Taken to Meet Goal	Actions to be Pursued by County	Notes
1	1998	To develop a greater understanding of race relations within communities that are being served.	Governmental agencies "should participate in diversity training and study circles groups to develop a greater understanding of race relations within communities that are being served."	1. The County issued an RFP for the Impacted Communities Study, and awarded the contract to GCR. The contract period is **July 1, 2014 – April 15, 2016**. 2. After discussions with NAHRO regarding partnership, it was determined that the County would need to develop its own training.[i] As a result, in **July 2015**, the County launched the Sussex County Learning & Performance Center, an online and in-person training center available to all County staff. An online course titled, "Diversity on the Job: Diversity and You" is currently available to all staff.	1. Through the Strong Communities Initiative, complete the Impacted Communities Study. (Timeframe: Completion in **April 2016**) 2. Partner with the DE Chapter of the Nat'l. Assoc. of Housing and Redevelopment Officials (NAHRO) to offer diversity training as part of the County's new curriculum training. See "Actions Taken to Meet Goal". Upon the completion of the Impacted Communities Study, the County will consider this strategy completed.	1998 AI, p. 13.
2	1998	To expand housing opportunities for persons with disabilities.	"Specific funding should be allocated on a state and jurisdictional level to groups or agencies to expand housing opportunities for persons with disabilities."	DSHA provides funding for persons with disabilities through the Housing Development Fund, the Tax Credit program, and SRAP Vouchers.	CD&H[ii] representation on the Universal Design Coalition.[iii] Universal Design is a way of homebuilding that incorporates barrier-free and accessible design features. The County will continue to support DelawareHousingSearch.org, a new free and real-time online service implemented by DSHA that lists all of the State's public and private rental units, as well as publicly funded for-sale units. This program is specifically geared towards the disabled through various search features. Each year, the County receives an annual report which lists the accomplishments of this collaborative effort. So long as the program is continuing to result in accomplishments related to fair housing for persons with disabilities, the County will consider its support of this program an effective strategy to meet the stated goal. Actions to be taken as a result of the review of the April 2012 Community and Choice document: 1. Track funding for accessibility modifications. (Timeframe: Beginning **July 1, 2015**)[iv] 2. Partner with The Money School to introduce financial literacy and credit repair course's to the County's low-income communities. (Timeframe: **July 1, 2016 – June 30, 2017**)[v] 3. The County will financially support the Money Follows the Person Demonstration	1998 AI, p. 28.

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	AI Report	Goal	Strategies to Meet Goal	Actions Taken to Meet Goal	Actions to be Pursued by County	Notes
					and/or the Delaware Aging and Disability Resource Center (ADRC). (Timeframe: **July 1, 2016 – June 30, 2017**)[vi] 4. Coordination with the County's Advisory Committee on Aging & Adults with Physical Disabilities. (Timeframe: **Beginning November 2015**)[vii] 5. Alignment with Measurable Results: The County will track the number of handicapped ramps and other accessibility features installed using this funding to show that the funding is being accessed. In addition, the County will track the number of courses offered and number of participants to show that the funding is being utilized. **(June 2016)** Meeting with housing advocates to explore options for increasing the supply of accessible and affordable housing: 1. Perform outreach to housing advocates - (1) Direct contact via phone or email to Milford Housing Development Corporation, Diamond State Community Land Trust, and Habitat for Humanity regarding meeting; (2) hold meeting for direct discussion. (**Completed Feb. 2015**) 2. How suggestions from meeting will be compiled - A synopsis of the discussion points from the meeting will be generated and presented to the County administration for consideration. (**Feb. 2015 through July 2015**) 3. How the County will assess the suggestions - The County will take into account the following in assessing the suggestions from the meeting: (1) Does the County have jurisdiction under the County Code; (2) would the suggestion require a change to the County Code and if so, the likelihood that such change would be approved; (3) cost to implement the suggestion; (4) does some other law (State/County) prevent the County from fully implementing the suggestion. The timeline for implementation of the suggestion(s) will be dependent upon the answers to the questions in #3 above. (**Feb. 2015 through July 2015**) 4. Result: County determined that sewer impact fee deferral may address this impediment and began implementing this suggestion.[viii] The County contacted each non-profit by phone to inform them of the availability of the deferral option. (**July 2015**) 5. Assessment Period (**July 2015 - July 2018**) 6. Alignment with Measurable Results: **Yearly beginning in July 2016**, the County will determine whether any non-profit developers, community land trust developers, or for-profit affordable housing developers have utilized the impact fee deferral and if, at the end of the assessment period (**July 2018**), the deferral option has been utilized the	

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					County will determine this strategy to be successful.	
3	1998	To expand housing opportunities for persons with disabilities.	"Legislation should be introduced to require developers of multi-family units, condos and apartments to submit plans and/or language for specific review of compliance of ADA and new construction guidelines to the State Council for Persons with Disabilities, and/or licensing and inspection divisions."	The County has determined that the County's Assessment Division requires any building owner applying for a permit to certify that he/she is aware of the requirement for architectural accessibility in certain facilities, as set forth in the Code of Sussex County, Chapter 45 (adoption of ICC/ANSI A117.1-2009), and that the facility for which the building permit has been obtained will be designed and constructed in accordance with those standards and provisions.[ix] As a result, the County believes this strategy has been completed.	The County will discuss this strategy with DSHA and the County's Planning & Zoning office as it may now be a part of DSHA's or the County's review during the PLUS process. (Completed: See "Actions Taken to Meet Goal")	1998 AI, p. 29.
4	1998	To expand housing opportunities for persons with disabilities.	Lack of Affordable Housing and inadequate funding for persons living with AIDS.	The Delaware HIV Consortium specifically works with persons with AIDS to connect them with services and housing. There are rental vouchers allocated to persons with AIDS/HOPWA. As a result, the County believes this strategy has been completed.		1998 AI, p. 30

	AI Report	Goal	Strategies to Meet Goal	Actions Taken to Meet Goal	Actions to be Pursued by County	Notes
5	1998		Local jurisdictions not involved in any fair housing activities with respect to mortgage lending.	Sussex County Association of REALTORS offers fair housing training to its members, of which mortgage lenders are affiliates. Also, mortgage originators are required annually to attend approved fair housing training.	Because credit history is a major reason for denial of home mortgage applications in Sussex County, the County will coordinate with HUD- approved housing counseling agencies, as well as financial literacy agencies to target credit repair education through existing advocacy organizations that work with minority populations on a regular basis. Specifically, the County will partner with The Money School to introduce financial literacy and credit repair courses to the County's low-income communities. (Timeframe: **July 1, 2016 – June 30, 2017**)	1998 AI, p.43
6	1998		Limited funding allocated for non-profit advocacy groups.	Sussex County funds numerous non-profit advocacy groups annually through its Human Service Grant program (i.e. DCRAC, Delaware Housing Coalition, Sussex Housing Group).	The County will explore the creation of a Housing Trust Fund. (Timeframe: **April 2016 – July 2016**)	1998 AI, 43.
7	1998 and 2011	"Ensure that members of the protected classes are represented on appointed volunteer boards." [2011 AI]	"...all boards, commissions, and councils should include protected class members from the communities that are being serviced to enhance community participation and to ensure that a fair and equal process is established." [1998 AI]	Sussex County, beginning in the 2013 grant cycle, reports the make-up of County boards and commissions (race, gender, ethnicity, disability status, familial status) to DSHA on an annual basis, as required by the Community Development Block Grant application.	The County will review existing boards and commissions to determine the number of protected class members and, as terms expire, give consideration to qualified candidates that belong to a protected class. The County will report to DSHA on appointments as required. (Timeframe: **Annually as required within the annual CDBG application**)	1998 AI, p. 45.; 2011 AI, DSHA/Balance of State Impediment #10

	AI Report	Goal	Strategies to Meet Goal	Actions Taken to Meet Goal	Actions to be Pursued by County	Notes
8	1998	To increase affordable housing and efforts to encourage zoning for affordable housing.	"Ease zoning and other regulatory barriers to affordable rental housing for families." [2011 AI] "Incentivize the development of mixed income housing in non-impacted areas." [2011 AI]	The County passed legislation creating the Moderately Priced Housing Unit (MPHU) and Sussex County Rental Program (SCRP) programs and also now participates in the Neighborhood Stabilization Program I (NSP 1) and Neighborhood Stabilization Program II (NSP 2) programs to address this goal. The County has passed legislation to increase the reach of the MPHU program to households earning 50% to 120% of AMI. The County now includes language promoting affordable housing in its Application for Major Subdivision, the County's Technical Advisory Committee review letters, and the County's comments in the PLUS process.[x]	The County will add the availability of the sewer deferment incentive to the existing Affordable Housing Support Policy in order to raise public awareness of this incentive and encourage its use. (Timeframe: **November 30, 2015**) The County is evaluating the effectiveness of the MPHU and SCRP programs and will be identifying barriers to their use and any structural problems within the programs (Timeframe: **October 1, 2015 – June 1, 2017**). Depending upon the results of this evaluation, the County will consider expanding incentives offered to developers to participate in the MPHU and SCRP programs and to developers of affordable housing developments who are able to provide a guarantee to the County of the affordability of the dwelling units. If the programs are determined to be ineffective because they are not being utilized, the County intends to determine what barriers associated with those programs are responsible. In the meantime, the County will develop a fact sheet that will set forth the cost offset allocation and density bonus incentives within the MPHU and SCRP programs and insert the fact sheet into the application materials for these programs. (Timeframe: **January 1, 2016**)	1998 AI, p. 52. 2011 AI, Regional Plan Impediment #6, Strategy E, p. 573
9	1998		Fair housing training of policy makers.	Sussex County staff, appointed officials, and elected officials received fair housing training specific to the Fair Housing Act on 6/5/12, 3/8/13, 2/28/14, and 7/23/15.	Sussex County staff, appointed officials, and elected officials will continue to receive fair housing training specific to the Fair Housing Act in 2016.	1998 AI, p. 59. 2011 AI, Regional Plan Impediment #10, Strategy D, p. 577
10	1998		"Funding should be allocated to the affected areas for development of water and sewer districts."	The County funded the extension of sewer to Pinetown (2009), the Ellendale Needs Assessment Study (2000), the Ellendale Water Study (2004), and will be conducting the sewer assessment in Bethel and Laurel (2013).	The County is considering the concept of a Western Sussex Sewer District. This planning incorporates the ability to include impacted areas within the district. The County is working with many stakeholders and investigating the feasibility of creating a County Water District in the Ellendale area including South Old State Road and the New Hope Community. (Timeframe: **Beginning July 2015**)	1998 AI, p. 61.

	AI Report	Goal	Strategies to Meet Goal	Actions Taken to Meet Goal	Actions to be Pursued by County	Notes
11	1998	To protect land owning residents in the West Rehoboth community from losing their property due to increased taxes for infrastructure improvements and development.	"… a Trust Fund should be established."	As a result of interaction with the West Rehoboth Community Land Trust, the studio apartment ordinances (Ordinances 1959 & 2245) were passed. The Land Trust was established to create permanently affordable housing, preserve the historic West Rehoboth Community, as well as revitalize the community. Further, Sussex County granted $7,500 in FY2015 to the West Rehoboth Coalition and more than $71,500 to the West Rehoboth Community Land Trust from 2006 to 2015. CD&H has allocated over $635,000 in CDBG funds to help with revitalization and rehabilitation efforts.	The County will continue to monitor and support the West Rehoboth Coalition and the West Rehoboth Community Land Trust.	1998 AI, p. 61.
12	2003	"..to address Fair Housing issues in Sussex County, with particular attention to the rapidly growing Hispanic population."	"A strategy should be developed...	In accordance with the County's Affordable and Fair Housing Marketing Plan notices of County CD&H meetings and public hearings are published in at least one Hispanic newspaper or website. The County has instituted a Housing Discrimination Complaint Form (available in English and Spanish) and process for addressing complaints. CD&H attends the annual Hispanic Festival.	The County will continue to support DelawareHousingSearch.org. The site can be entirely read in Spanish and has a bilingual call center available. Each year, the County receives an annual report which lists the accomplishments of this collaborative effort. So long as the program is continuing to result in accomplishments related to fair housing for persons within the Hispanic population, the County will consider its support of this program an effective strategy to meet the stated goal. The County will continue to attend the annual Hispanic Festival held in August in Millsboro. At the Festival the County provides various materials related to all County programs and Fair Housing, in English and Spanish.	2003 AI, p. 95.

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13	2011	Increase access to County programs for persons with limited English proficiency (LEP).	"Sussex County should conduct the four-factor analysis outlined in the Federal Register of January 22, 2007, and at www.lep.gov, to determine the extent to which the translation of vital documents is necessary to assist persons with limited English proficiency (LEP) in accessing the County's programs. If it is determined that the need for a Language Access Plan (or LEP plan) exists, the County must prepare the LAP in order to comply with Title VI of the Civil Rights Act of 1964."	Sussex County conducted the four-factor analysis in June 2013, which indicated that only Spanish met the threshold for requiring written translation of vital documents.[xi]	The County will complete, post, and begin implementing a Limited English Proficiency (LEP) Plan. (Timeframe: Announcement on **September 30, 2015;** Implementation Period from **September 30, 2015 to December 31, 2015**)	2011 AI, DSHA/Balance of State Impediment #1, p. 472.
14	2011	"Increase access to County programs for persons with limited English proficiency (LEP)."	"Upon release of updated data from the 2010 U.S. Census, ….Sussex County… should review the data to determine if any of the individual Indo-European languages exceed 1,000 persons with LEP."	Sussex County conducted the four-factor analysis in June 2013, which indicated that only Spanish met the threshold for requiring written translation of vital documents.	The County will complete, post, and begin implementing a Limited English Proficiency (LEP) Plan. (Timeframe: Announcement on **September 30, 2015**; Implementation Period from **September 30, 2015 to December 31, 2015**)	2011 AI, DSHA/Balance of StateImpediment #1, p. 472

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15	2011	"Provide home ownership opportunities to minority households throughout the Balance of State through increased employment opportunities, home ownership counseling, and homebuyer education."	"Strengthen partnerships with local lenders that will offer homebuyer education and other incentives to purchase a home in the Balance of State." Elsewhere in the AI addressing this goal, it states: "Identify effective ways for …Sussex County… to increase home ownership among minorities, residents of LMI census tracts, and LMI residents. Such methods include: (a) Increasing sustainable home ownership opportunities through financial literacy education including credit counseling and pre- and post-home purchase education; (b) Increasing lending, credit, and banking services in LMI census tracts and minority census tracts; and (c) Increasing marketing and outreach efforts of affordable mortgage products that are targeted for residents of LMI census tracts, LMI residents, and minorities."	Sussex County held its inaugural Homebuyer Fair on September 27, 2014. Attendees of the free event receive copies of their credit report, a brief one-on-one session with a HUD-approved housing counselor, and access to 45+ exhibitors with various resources related to homeownership and financial empowerment. The County does a direct mailing to all residents living within the 14-identified impacted communities. The fair will continue to be held annually each September, in partnership with the Delaware State Housing Authority, Sussex County Association of Realtors, NCALL Research, and First State Community Action Agency. The 2015 fair was held on September 26, 2015.	Because credit history is a major reason for denial of home mortgage applications in Sussex County, the County will coordinate with HUD- approved housing counseling agencies, as well as financial literacy organizations to target credit repair education through existing advocacy organizations that work with minority and LMI residents on a regular basis. Specifically, the County will partner with The Money School to introduce financial literacy and credit repair courses to the County's low-income communities. Further, once the data from the Impacted Communities Study is compiled and released, the County will also be able to assist those communities that have specifically identified financial literacy as a need for their community. (Timeframe: **July 1, 2016 – June 30, 2017**) The County will continue its annual Homebuyer Fair.	2011 AI, DSHA/Balance of State Impediment #2, p. 473
16	2011	"Increase the supply of affordable housing in the Balance of State available to households making 80% or less of the median household income."	"Sussex County should continue to offer the SCRP and the MPHU programs to provide incentives to property owners and investors to build affordable housing." "Developers should be made aware that the cost offset allocations and density bonuses can defray the cost of creating the required affordable units."	The County has passed legislation to increase the reach of the MPHU program to households earning 50% to 120% of MHI.	The County will also continue to participate in the NSP 1 and NSP 2 programs. The County will add the availability of the sewer deferment incentive to the existing Affordable Housing Support Policy in order to raise public awareness of this incentive and encourage its use. (Timeframe: **November 30, 2015**) The County is evaluating the effectiveness of the MPHU and SCRP programs and will be identifying barriers to their use and any structural problems within the programs (Timeframe: **October 1, 2015 – June 1, 2017**). Depending upon the results of this evaluation, the County will consider expanding incentives offered to developers to participate in the MPHU and SCRP programs and to developers of affordable housing developments who are able to provide a guarantee to the County of the affordability of the dwelling units. If the programs are determined to be ineffective because they are not being utilized, the County intends to determine what barriers associated with those programs are responsible. In the meantime, the County will develop a fact sheet that will discuss the cost offset allocation and density bonus incentives within the MPHU and	2011 AI, DSHA/Balance of State Impediment #3, p. 474.

	AI Report	Goal	Strategies to Meet Goal	Actions Taken to Meet Goal	Actions to be Pursued by County	Notes
					SCRP programs and insert the fact sheet into the application materials for these programs. (Timeframe: **January 1, 2016**)	
17	2011	"Increase the supply of affordable housing in the Balance of State available to households making 80% or less of the median household income."	"Sussex County should play a more proactive role in seeking out and encouraging developers to participate in the MPHU and SCRP programs."	The County has passed legislation to increase the reach of the MPHU program to households earning 50% to 120% of MHI.	The County is evaluating the effectiveness of the MPHU and SCRP programs and will be identifying barriers to their use and any structural problems within the programs (Timeframe: **October 1, 2015 – June 1, 2017**). Depending upon the results of this evaluation, the County will consider expanding incentives offered to developers to participate in the MPHU and SCRP programs and to developers of affordable housing developments who are able to provide a guarantee to the County of the affordability of the dwelling units. If the programs are determined to be ineffective because they are not being utilized, the County intends to determine what barriers associated with those programs are responsible. In the meantime, the County will develop a fact sheet that will discuss the cost offset allocation and density bonus incentives within the MPHU and SCRP programs and insert the fact sheet into the application materials for these programs. (Timeframe: **January 1, 2016**)	2011 AI, DSHA/Balance of State Impediment #3, p. 443, 475.
18	2011	Increase the supply of affordable housing in the Balance of State available to households making 80% or less of the median household income.	"…Sussex County should expand other incentives for property owners and investors to build new affordable rental and owner units in the non-impacted areas of the County, including the reduction or waiver of impact and planning fees and streamlined approval of development projects that feature affordable housing components." "County and local government entities throughout the State of Delaware should reduce and/or waive their respective sewer, water, and/or public facilities and services impact fees for area developers and non-profit organizations seeking to build affordable units, both renter and owner units."		As mentioned in #2 above, the County has instituted and will be assessing the success of the impact fee deferral incentive. If the incentive is utilized in the development of affordable rental and/or owner units, then the County will consider this incentive successful.	2011 AI, DSHA/Balance of State Impediment #3, p. 475. 2011 AI, Regional Plan Impediment #4.

	AI Report	Goal	Strategies to Meet Goal	Actions Taken to Meet Goal	Actions to be Pursued by County	Notes
19	2011	Increase the supply of accessible, affordable housing in the Balance of State.	"Conduct a statewide study to determine the supply/demand characteristics of housing for persons with mobility and sensory impairments.	Community and Choice: Housing Needs for People with Disabilities in Delaware was released by the Delaware Housing Coalition & the Housing Sub-Committee of the Governor's Commission on Community Based Alternatives for People with Disabilities in April 2012. The report is comprehensive and addressed mobility and sensory impairments. As a result, the County believes this strategy has been completed.		2011 AI, DSHA/Balance of State Impediment #4
20	2011	Ensure DSHA policies affirmatively further fair housing and meet all applicable HUD requirements.	"In developing policy priorities for entitlement investment in affordable housing, ...Sussex County should give first consideration to the use of CDBG and HOME funds for new family rental and for-sale housing developments on sites in non-impacted areas."	DSHA has modified their application processes for the HDF and Tax Credit programs. These changes now promote and give incentives to developers to build new rental and for-sale housing in non-impacted areas. As a result, the County believes this strategy has been completed.		2011 AI, DSHA/Balance of State Impediment #5, p. 477
21	2011	Establish fair housing as a priority in the County's long-range planning.	"Develop a statement summarizing the County's overarching policies aimed at affirmatively furthering fair housing choice in both the private and public sectors. The stated policies should extend to all municipalities and unincorporated areas throughout the County. The County's 2012 Comprehensive Plan Update should include this policy statement."		The County will include this information in next Comprehensive Plan Update and will mention Council's Fair Housing Policy Resolution and the Affordable and Fair Housing Marketing Plan. (Timeframe: **October 2015 – 2017**)	2011 AI, DSHA/Balance of State Impediment #8, p. 479

	AI Report	Goal	Strategies to Meet Goal	Actions Taken to Meet Goal	Actions to be Pursued by County	Notes
22	2011	Establish fair housing as a priority in the County's long-range planning.	"During the process of developing the County's 2012 Comprehensive Plan Update, the following should be included: (a) a detailed strategy for increasing the supply of affordable rental housing for families in non-impacted areas; (b) a detailed strategy for expanding the supply of rental housing accessible to persons with mobility impairments; (c) a leadership role should be established for the County in relation to the nature and extent of technical assistance, training, and funding that the County is prepared to provide to municipalities and unincorporated areas; and (d) stated goals to expand the supply of affordable rental housing for families that is within proximity to entry level and/or lower skill jobs."		The County will work with OSPC and DSHA to address the issues mentioned and will include a discussion of those issues in the 2017 Comprehensive Plan Update. (Timeframe: **October 2015 – 2017**)	2011 AI, DSHA/Balance of StateImpediment #8, p. 479
23	2011	Establish fair housing as a priority in the County's long-range planning.	"Collaborate with affordable housing developers to select sites, construct infrastructure, provide financial subsidies, and otherwise support the expansion of affordable housing, including rental units for lower income families."	To assist Diamond State Community Land Trust (DSCLT), Habitat for Humanity, and Milford Housing Development Corporation in acquiring certain funding to pursue develop of a number of affordable housing units, the County supplied letters of support to DSHA and certification to FHLBank.[xii] This action on the part of the County is an example of the County's implementation of its new Affordable Housing Support Policy and Template Support Letter.	The County will continue to implement its new Affordable Housing Support Policy and utilize its Template Support Letter. The County intends to assess the success of this new policy concurrent with the assessment of the impact fee deferral incentive (**July 2015 – July 2018**). Afterwards, and if warranted, the County will pursue new financial incentives for affordable housing development which may include formalizing a package of incentives to be offered to developers of affordable housing communities that can provide a guarantee to the County of the ultimate affordability of the units. The County will work with the Office of State Planning and Coordination (OSPC) and DSHA to determine the appropriate steps to addressing the issue of long-range planning for affordable housing as part of the update to the County's Comprehensive Plan. (Timeframe: **October 2015 – 2017**) The County is evaluating the effectiveness of the MPHU and SCRP programs and will be identifying barriers to their use and any structural problems within the programs (Timeframe: **October 1, 2015 – June 1, 2017**). Depending upon the results of this evaluation, the County will consider expanding incentives offered to developers to participate in the MPHU and SCRP programs and to developers of affordable housing developments who are able to provide a guarantee to the County of the affordability of the	2011 AI, DSHA/Balance of State Impediment #8, p. 479 - 480

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					dwelling units. If the programs are determined to be ineffective because they are not being utilized, the County intends to determine what barriers associated with those programs are responsible.	
24	2011		"Facilitate and promote land use policies and recommendations that enable an increase in the supply of affordable rental housing in areas with adequate infrastructure."		The County will work with the Office of State Planning and Coordination (OSPC) and DSHA to address these issues and will include a discussion of these issues in the 2017 Comprehensive Plan Update. (Timeframe: **October 2015 – 2017**)	2011 AI, DSHA/Balance of State Impediment #8, Strategy C, p. 488

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25	2011	Ensure that local zoning ordinances are in compliance with the Fair Housing Act.	"Sussex County should define specific geographic areas that are suitable for multi-family housing and work towards reducing regulatory barriers that impede such development."	The County's zoning code, combined with the Office of State Planning and Coordination's (OSPC's) Strategies for State Spending define the specific areas in the County that are suitable for multi-family housing. The County drafted a letter to affordable housing developers supporting affordable housing located in areas identified by DSHA as appropriate for affordable housing in their application for changes to their HDF and Tax Credit programs.	As part of the 2017 Comprehensive Plan Update, the County will work with the Office of State Planning and Coordination (OSPC) and DSHA on the issue of long-range planning for affordable housing in Sussex County. (Timeframe: **October 2015 – 2017**)	2011 AI, DSHA/Balance of State Impediment #9, p. 480
26	2011	Ensure that local zoning ordinances are in compliance with the Fair Housing Act.	"Sussex County should amend its zoning ordinance by lowering the minimum site size standards to encourage the creation of smaller, more affordable residential communities."	The County passed the studio apartment ordinances (Ordinances 1959 & 2245), which address this impediment. As a result, the County considers this strategy completed.		2011 AI, DSHA/Balance of State Impediment #9, p. 480.

	AI Report	Goal	Strategies to Meet Goal	Actions Taken to Meet Goal	Actions to be Pursued by County	Notes
27	2011	Ensure that local zoning ordinances are in compliance with the Fair Housing Act.	Sussex County should revise the definition of "family" in its Code to allow more than four unrelated individuals to live together. The current definition unnecessarily restricts housing choice for persons with disabilities because the Code provides no separate definition for a group home and no exception for this use. "Sussex County ....should simplify [its] definition of 'family' by focusing on whether a household functions as a cohesive unit rather than distinguishing between related and unrelated persons. A restrictive definition that limits the number or type of relationship between persons living together as a household unit in a single-family dwelling unit is incompatible with many modern living situations and potentially discriminates against persons with disabilities."	On December 2, 2014, the County voted to adopt an amendment to the Sussex County Zoning Code regarding the definitions of "dwellings" and "family". As a result, the County considers this strategy completed.		2011 AI, DSHA/Balance of State Impediment #9, p. 443-444; See also 2011 AI, p. 481 ("The definition should not limit the number or type of relationship between persons living together as a household unit in a single-family dwelling unit.")
28	2011	Increase and enhance fair housing outreach and education efforts throughout the County.	Engage HUD-approved housing counselors to target credit repair education through existing advocacy organizations that work extensively with minorities.	NCALL and First State Community Action are the County's partners for the annual Homebuyer Fair. At the Homebuyer Fair, participants can receive a free credit report and a 15-minute meeting with a housing counselor.	Because credit history is a major reason for denial of home mortgage applications in Sussex County, the County will coordinate with housing counseling and financial literacy agencies to target credit repair education through existing advocacy organizations that work with minority populations on a regular basis. Specifically, the County will partner with The Money School to introduce financial literacy and credit repair courses to the County's low-income communities. Further, once the data from the Impacted Communities Study is compiled and released, the County will also be able to assist those communities that have specifically identified financial literacy as a need for their community. (Timeframe: **July 1, 2016 – June 30, 2017**)	2011 AI, DSHA/Balance of State Impediment #11, p. 483

	AI Report	Goal	Strategies to Meet Goal	Actions Taken to Meet Goal	Actions to be Pursued by County	Notes
29	2011	Increase and enhance fair housing outreach and education efforts throughout the County.	Engage in a communication campaign that markets home ownership opportunities to all minorities.	The County is currently implementing the Strong Communities Initiative and an Affordable and Fair Housing Marketing Plan as elements to meet this goal. Sussex County held its annual Homebuyer Fair on September 27, 2014 and September 26, 2015. Advertising of the Fair included a direct mailing campaign to residents in the Impacted Communities. The County supported DelawareHousingSearch.org. The County has attended the annual Hispanic Festival.	The County will continue to implement the Strong Communities Initiative and Affordable and Fair Housing Marketing Plan. The County will continue its annual Homebuyer Fair with targeted marketing as set forth in the Affordable and Fair Housing Marketing Plan. The County will continue to support DelawareHousingSearch.org. The County will continue to attend the annual Hispanic Festival held in August in Millsboro. At the Festival, the County provides various materials related to all County programs and Fair Housing, in English and Spanish.	2011 AI, DSHA/Balance of State Impediment #11, p. 483
30	2011		Foreclosures appear to disproportionately affect minority households in the Balance of State. DSHA & Sussex County can mitigate the impacts of foreclosure by supporting increased buyer education and counseling, as well as supporting legislative protections for borrowers to assist them in meeting housing costs.	County CD&H staff currently participates on the Delaware Mortgage Fraud Task Force. Sussex County funds numerous non-profit counseling agencies annually through its Human Service Grant program (i.e. DCRAC, First State Community Action, and NCALL) that have foreclosure prevention programs and education curriculums.	The County will partner with The Money School to introduce financial literacy and credit repair courses to the County's low-income communities. Further, once the data from the Impacted Communities Study is compiled and released, the County will also be able to assist those communities that have specifically identified financial literacy as a need for their community. (Timeframe: **July 1, 2016 – June 30, 2017)** The County will send a letter to State legislators in Sussex County making them aware of County's requirement under this AI and expressing general support for future legislation addressing this issue. (Timeframe: **January 1, 2016)**	2011 AI, DSHA/Balance of State Impediment #12, p. 483

	AI Report	Goal	Strategies to Meet Goal	Actions Taken to Meet Goal	Actions to be Pursued by County	Notes
31	2011	Regional collaboration among the various entitlement communities throughout the State is needed in order to remedy segregation and concentration issues that persist in the City of Wilmington.	Encourage county planners and elected officials to consider the risks of failing to think and act regionally in terms of deconcentrating poverty in Wilmington. Conduct AFFH workshops with county planners and elected officials.	Sussex County staff, appointed officials, and elected officials received fair housing training specific to the Fair Housing Act on 6/5/12, 3/8/13, 2/28/14, and 7/23/15.	County CD&H staff will continue to attend AFFH workshops held throughout the State and will present a synopsis of the information to members of County Council. Sussex County staff, appointed officials, and elected officials will continue to receive fair housing training specific to the Fair Housing Act in 2016.	2011 AI, Regional Plan Impediment #6, Strategy D, p. 573
32	2011	There exists a continuing need for quality fair housing education, outreach, training, and real estate testing throughout the State.	Localities throughout the State that have rental property registration, licensing, and/or inspection programs should encourage landlords and property management companies to attend fair housing training by providing a calendar of seminars to be provided in each County. This calendar should be updated regularly, provided at time of initial registration, and posted on various jurisdictional websites. Jurisdictions should work collaboratively to facilitate, coordinate, and market fair housing seminars.	County CD&H updates the News & Events section on the department website regularly. CD&H is represented on the Board of Directors for the National Association of Housing & Redevelopment Officials (DE-NAHRO), which hosts an annual fair housing training every April specific to landlords and property managers.	County CD&H updates the News & Events section on the department website regularly, and will provide links to various fair housing seminars throughout the state (Timeframe: **Beginning October 31, 2015**) CD&H will continue to be active on the Board of Directors for the National Association of Housing & Redevelopment Officials (DE-NAHRO), which hosts an annual fair housing training every April specific to landlords and property managers.	2011 AI, Regional Plan Impediment #10, Strategy C, p. 577

[i] The County, through representation on the Board of Directors of DE NAHRO, organized a presentation and proposal by Devona Williams of Goeins-Williams Associates, Inc. from Claymont, Delaware in November 2014. The thought was to coordinate the various governmental jurisdictions throughout Delaware to attend a Diversity Training through DE NAHRO, presented by Goeins-Williams. However, it was determined that all other jurisdictions had diversity and fair housing training curriculums in place. The idea was ultimately abandoned. The County then pursued a proposal directly from Goeins-Williams Associates for Diversity Training in Sussex County in December 2014. Given the County's Annual Fair Housing Training, as well as the impending release of a County Training Program/Software that could focus on such training material, the County elected to abandon the idea of a third party trainer specific to Diversity Training.

[ii] "CD&H" means Sussex County's Community Development and Housing Department.

[iii] Universal design is subtle and the concept is beneficial to everyone. In July 2012, the Governor signed into law a bill designed by the Coalition requiring that the application process for public funding for the development of new dwelling units now incorporates a point scale for Universal Design features.

[iv] In order to increase the availability of and access to homeownership opportunities with accessibility features, the County will be expanding and coordinating its resources for accessibility modifications for homeowners and homebuyers. Specifically, the County receives emergency repair funding that targets owner-occupied households at or below 80% AMI. The funds are frequently used for minor home modifications for persons with disabilities (ramps, walk-in showers, grab bars, and lifts). In the past, the County has not specifically tracked funding used for this purpose. The County will expand its accounting system to accurately identify the number of households assisted with new accessibility features and modifications.

[v] In order to increase the availability of and access to affordable housing for people with disabilities, the County will assist in the effort to improve asset-building opportunities for people with disabilities. Specifically, the County is working with The Money School (Delaware Financial Literacy Institute) to introduce financial literacy and credit repair courses to Sussex County's low-income rural communities. Our goal is to expand that relationship to include courses applicable and/or targeted to people with disabilities.

[vi] In order to build a community-based system of care with a range of housing options, the County will assist in this effort by prioritizing community-based care by redirecting resources from institutional care to community-based services and providing for housing needs. Specifically, the County will financially support the Money Follows the Person Demonstration for individuals exiting long-term facility care to Sussex County residences and/or Delaware Aging and Disability Resource Center (ADRC), web-based system (&hotline). Both are developed and maintained by DHSS.

[vii] The County and the Delaware State Housing Authority are scheduled to present to the County's Advisory Committee on Aging & Adults with Physical Disabilities on November 16th to discuss the various programs offered by both agencies that are applicable to this committee and the community they represent. Given the widespread attendance of the meeting, such as representatives from the Division of Services for Aging & Adults with Physical Disabilities and the Delaware Aging & Disability Resource Center, representatives from the County and DSHA plan to also host an informal forum and discussion to discuss ways that both agencies can improve their services to this community. This committee will host the 3rd annual LIVE Conference in Georgetown on October 21, 2015, which will be focused on Transportation: Moving Forward. Each year, the conference focuses on major issues that affect Aging and Disability Communities. Last year's conference focused on Accessibility. Further, the committee meets every other month, hosting a speaker at every meeting, advertised to the public in advance.

[viii] It was determined by meeting with the housing advocacy groups that the cost of the sewer impact fee was a significant factor affecting the development of affordable housing. The sewer impact fee deferral will act as a financial incentive for affordable housing organizations by reducing the upfront costs of developing each dwelling unit. The impact fee would not be collected until the land upon which the dwelling unit is located is sold. In the case of a community that was developed utilizing a community land trust model, the land is not sold, only the dwelling unit, so the cost of the sewer impact fee is not paid.

[ix] Chapter 45 of the Sussex County Code is an adoption of ICC/ANSI A117.1-2009. The International Code Council (ICC) is committed to meeting or exceeding the accessibility requirements of the Americans with Disabilities Act (ADA) and the Fair Housing Act (FHA).

[x] The County now includes in its Application for Major Subdivision the following statement, "Sussex County promotes racially/ethnically diverse, mixed income, affordable housing in all areas under its jurisdiction. Accordingly, Developers are encouraged to provide affordable housing opportunities to Sussex County residents in all new developments, affirmatively market those affordable housing units to diverse populations, and meet with the surrounding residents early in the development approval process." The County's Technical Advisory Committee (TAC) reviews every submitted subdivision, and each review letter includes the following statement "Sussex County promotes all forms of affordable housing and encourages the Developer to include affordable housing opportunities in its developments, affirmatively market those affordable housing units to diverse populations, and meet with the surrounding residents early in the development approval process." The County provides comments on all proposed residential projects in Sussex County through the State Planning Office's PLUS process. Those comments encourage developers to provide and finance affordable housing opportunities to Sussex County residents and affirmatively market their units to diverse populations.

[xi] CD&H has translated several vital documents to date and are available on the County's website. In July 2014, the County added a notice in English & Spanish on the County's website under meeting calendar, and each calendar event to indicate the availability of sign language or language interpreters.

[xii] See the County's Fourth Semi-Annual Compliance Report dated December 19, 2014; Exhibit 1.

Sussex County AI Evaluation and Proposed Priority Fair Housing Plan (~~Inc. DSHA Comments~~Revised October 2015)

	AI Report	Goal	Strategies to Meet Goal	Actions Taken to Meet Goal	Actions to be Pursued by County	Notes
1	1998	To develop a greater understanding of race relations within communities that are being served.	Governmental agencies "should participate in diversity training and study circles groups to develop a greater understanding of race relations within communities that are being served."	1. The County issued an RFP for the Impacted Communities Study, and awarded the contract to GCR. The contract period is **July 1, 2014 – April 15, 2016.** 2. After discussions with NAHRO regarding partnership, it was determined that the County would need to develop its own training.[i] As a result, in **July 2015**, the County launched the Sussex County Learning & Performance Center, an online and in-person training center available to all County staff. An online course titled, "Diversity on the Job: Diversity and You" is currently available to all staff.	1. Through the Strong Communities Initiative ~~(see attached discussion,~~ complete the Impacted Communities Study. (Timeframe: Completion in **April 2016**) 2. Partner with the ~~Delaware~~DE Chapter of the ~~National~~Nat'l. Assoc. of Housing and Redevelopment Officials (NAHRO) to offer diversity training as part of the County~~'~~'s new curriculum training. See "Actions Taken to Meet Goal". Upon the completion of the Impacted Communities Study, the County will consider this strategy completed.	1998 AI, p. 13.
2	1998	To expand housing opportunities for persons with disabilities.	"Specific funding should be allocated on a state and jurisdictional level to groups or agencies to expand housing opportunities for persons with disabilities."	DSHA provides funding for persons with disabilities through the Housing Development Fund, the Tax Credit program, and SRAP Vouchers.	CD&~~HH~~[ii] representation on the Universal Design Coalition.[iii] Universal Design is a way of homebuilding that incorporates barrier-free and accessible design features. ~~The design is subtle and the concept is beneficial to everyone. In July 2012, the Governor signed into law a bill designed by the Coalition requiring that the application process for public funding for the development of new dwelling units now incorporates a point scale for Universal Design features.~~ The County will ~~support DelawareHousingSearch.org, a new free and real-time online service that lists all of the State's public and private rental units, as well as publically funded for-sale units. This program is specifically geared towards the disabled through various search features.~~ continue to support DelawareHousingSearch.org, a new free and real-time online service implemented by DSHA that lists all of the State's public and private rental units, as well as publicly funded for-sale units. This program is specifically geared towards the disabled through various search features. Each year, the County receives an annual report which lists the accomplishments of this collaborative effort. So long as the program is continuing to result in accomplishments related to fair housing for persons with disabilities, the County will consider its support of this program an effective strategy to meet the stated goal. Actions to be taken as a result of the review of the April 2012 Community and Choice document: 1. Track funding for accessibility modifications. (Timeframe: Beginning **July 1, 2015**)[iv]	1998 AI, p. 28.

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	AI Report	Goal	Strategies to Meet Goal	Actions Taken to Meet Goal	Actions to be Pursued by County	Notes
					2. Partner with The Money School to introduce financial literacy and credit repair course's to the County's low-income communities. (Timeframe: **July 1, 2016 – June 30, 2017**)[v] 3. The County will financially support the Money Follows the Person Demonstration and/or the Delaware Aging and Disability Resource Center (ADRC). (Timeframe: **July 1, 2016 – June 30, 2017**)[vi] 4. Coordination with the County's Advisory Committee on Aging & Adults with Physical Disabilities. (Timeframe: **Beginning November 2015**)[vii] 5. Alignment with Measurable Results: The County will track the number of handicapped ramps and other accessibility features installed using this funding to show that the funding is being accessed. In addition, the County will track the number of courses offered and number of participants to show that the funding is being utilized. **(June 2016)** Meeting with housing advocates to explore options for increasing the supply of accessible and affordable housing: 1. Perform outreach to housing advocates - (1) Direct contact via phone or email to Milford Housing Development Corporation, Diamond State Community Land Trust, and Habitat for Humanity regarding meeting; (2) hold meeting for direct discussion. **(Completed Feb. 2015)** 2. How suggestions from meeting will be compiled - A synopsis of the discussion points from the meeting will be generated and presented to the County administration for consideration. **(Feb. 2015 through July 2015)** 3. How the County will assess the suggestions - The County will take into account the following in assessing the suggestions from the meeting: (1) Does the County have jurisdiction under the County Code; (2) would the suggestion require a change to the County Code and if so, the likelihood that such change would be approved; (3) cost to implement the suggestion; (4) does some other law (State/County) prevent the County from fully implementing the suggestion. The timeline for implementation of the suggestion(s) will be dependent upon the answers to the questions in #3 above. **(Feb. 2015 through July 2015)** 4. Result: County determined that sewer impact fee deferral may address this impediment and began implementing this suggestion.[viii] The County contacted each non-profit by phone to inform them of the availability of the deferral option. **(July 2015)** 5. Assessment Period **(July 2015 - July 2018)**	

	AI Report	Goal	Strategies to Meet Goal	Actions Taken to Meet Goal	Actions to be Pursued by County	Notes
					6. Alignment with Measurable Results: **Yearly beginning in July 2016**, the County will determine whether any non-profit developers, community land trust developers, or for-profit affordable housing developers have utilized the impact fee deferral and if, at the end of the assessment period (**July 2018**), the deferral option has been utilized the County will determine this strategy to be successful.	
3	1998	To expand housing opportunities for persons with disabilities.	"Legislation should be introduced to require developers of multi-family units, condos and apartments to submit plans and/or language for specific review of compliance of ADA and new construction guidelines to the State Council for Persons with Disabilities, and/or licensing and inspection divisions."	The County has determined that the County's Assessment Division requires any building owner applying for a permit to certify that he/she is aware of the requirement for architectural accessibility in certain facilities, as set forth in the Code of Sussex County, Chapter 45 (adoption of ICC/ANSI A117.1-2009), and that the facility for which the building permit has been obtained will be designed and constructed in accordance with those standards and provisions.[IX] As a result, the County believes this strategy has been completed.	The County will discuss this strategy with DSHA and the County's Planning & Zoning office as it may now be a part of DSHA's or the County's review during the PLUS process. (Completed: See "Actions Taken to Meet Goal")	1998 AI, p. 29.
4	1998	To expand housing opportunities for persons with disabilities.	Lack of Affordable Housing and inadequate funding for persons living with AIDS.	The Delaware HIV Consortium specifically works with persons with AIDS to connect them with services and housing. There are rental vouchers allocated to persons with AIDS/HOPWA. As a result, the County believes this ~~impediment~~strategy has been ~~addressed~~completed.		1998 AI, p. 30

	AI Report	Goal	Strategies to Meet Goal	Actions Taken to Meet Goal	Actions to be Pursued by County	Notes
5	1998		Local jurisdictions not involved in any fair housing activities with respect to mortgage lending.	Sussex County Association of REALTORS offers fair housing training to its members, of which mortgage lenders are affiliates. Also, mortgage originators are required annually to attend approved fair housing training.	Because credit history is a major reason for denial of home mortgage applications in Sussex County, the County will coordinate with HUD- approved housing counseling agencies, as well as financial literacy agencies to target credit repair education through existing advocacy organizations that work with minority populations on a regular basis. Specifically, the County will partner with The Money School to introduce financial literacy and credit repair courses to the County's low-income communities. (Timeframe: **July 1, 2016 – June 30, 2017**)	1998 AI, p.43
6	1998		Limited funding allocated for non-profit advocacy groups.	Sussex County funds numerous non-profit advocacy groups annually through its Human Service Grant program (i.e. DCRAC, Delaware Housing Coalition, Sussex Housing Group).	The County will explore the creation of a Housing Trust Fund. (Timeframe: **April 2016 – July 2016**)	1998 AI, 43.
7	1998 and 2011	"Ensure that members of the protected classes are represented on appointed volunteer boards." [2011 AI]	"...all boards, commissions, and councils should include protected class members from the communities that are being serviced to enhance community participation and to ensure that a fair and equal process is established." [1998 AI]	Sussex County, beginning in the 2013 grant cycle, reports the make-up of County boards and commissions (race, gender, ethnicity, disability status, familial status) to DSHA on an annual basis, as required by the Community Development Block Grant application.	The County will review existing boards and commissions to determine the number of protected class members and, as terms expire, give consideration to qualified candidates that belong to a protected class. The County will report to DSHA on appointments as required. (Timeframe: **Annually as required within the annual CDBG application**)	1998 AI, p. 45.; 2011 AI, DSHA/Balance of State Impediment #10

	AI Report	Goal	Strategies to Meet Goal	Actions Taken to Meet Goal	Actions to be Pursued by County	Notes
8	1998	To increase affordable housing and efforts to encourage zoning for affordable housing.	"Ease zoning and other regulatory barriers to affordable rental housing for families." [2011 AI] "Incentivize the development of mixed income housing in non-impacted areas." [2011 AI]	The County passed legislation creating the Moderately Priced Housing Unit (MPHU) and Sussex County Rental Program (SCRP) programs and also now participates in the Neighborhood Stabilization Program I (NSP 1) and Neighborhood Stabilization Program II (NSP 2) programs to address this goal. The County has passed legislation to increase the reach of the MPHU program to households earning 50% to 120% of AMI. The County now includes language promoting affordable housing in its Application for Major Subdivision, the County's Technical Advisory Committee review letters, and the County's comments in the PLUS process.[x]	The County ~~has introduced legislation to increase the reach of the MPHU program to households earning 50% to 120% of MHI.~~ ~~The~~will add the availability of the sewer deferment incentive to the existing Affordable Housing Support Policy in order to raise public awareness of this incentive and encourage its use. (Timeframe: **November 30, 2015**) The County is evaluating the effectiveness of the MPHU and SCRP programs and will be identifying barriers to their use and any structural problems within the programs (Timeframe: **October 1, 2015 – June 1, 2017**). Depending upon the results of this evaluation, the County will consider expanding incentives offered to developers to participate in the MPHU and SCRP programs and to developers of affordable housing developments who are able to provide a guarantee to the County of the affordability of the dwelling units. If the programs are determined to be ineffective because they are not being utilized, the County intends to determine what barriers associated with those programs are responsible. In the meantime, the County will develop a fact sheet that will set forth the cost offset allocation and density bonus incentives within the MPHU and SCRP programs and insert the fact sheet into the application materials for these programs. (Timeframe: **January 1, 2016**)	1998 AI, p. 52. 2011 AI, Regional Plan Impediment #6, Strategy E, p. 573
9	1998		Fair housing training of policy makers.	~~Accomplished~~Sussex County staff, appointed officials, and elected officials received fair housing training specific to the Fair Housing Act on 6/5/12, 3/8/13, 2/28/14, and ~~will occur annually for the next 3 years.~~7/23/15.	Sussex County ~~CD&H will~~ staff, appointed officials, and elected officials will continue ~~representation at numerous~~to receive fair housing ~~events held~~training specific to the Fair Housing Act in ~~Delaware.~~2016.	1998 AI, p. 59. 2011 AI, Regional Plan Impediment #10, Strategy D, p. 577
10	1998		"Funding should be allocated to the affected areas for development of water and sewer districts."	The County funded the extension of sewer to Pinetown (2009), the Ellendale Needs Assessment Study (2000), the Ellendale Water Study (2004), and will be conducting the sewer assessment in Bethel and Laurel (2013).	The County is considering the concept of a Western Sussex Sewer District. This planning incorporates the ability to include impacted areas within the district. The County is working with many stakeholders and investigating the feasibility of creating a County Water District in the Ellendale area including South Old State Road and the New Hope Community. (Timeframe: **Beginning July 2015**)	1998 AI, p. 61.

	AI Report	Goal	Strategies to Meet Goal	Actions Taken to Meet Goal	Actions to be Pursued by County	Notes
11	1998	To protect land owning residents in the West Rehoboth community from losing their property due to increased taxes for infrastructure improvements and development.	"… a Trust Fund should be established."	As a result of interaction with the West Rehoboth Community Land Trust, the studio apartment ordinances (Ordinances 1959 & 2245) were passed. The Land Trust was established to create permanently affordable housing, preserve the historic West Rehoboth Community, as well as revitalize the community. Further, Sussex County granted $~~3,500~~7,500 in ~~2012~~FY2015 to the West Rehoboth Coalition and more than $~~63,000~~71,500 to the West Rehoboth Community Land Trust from 2006 to ~~2013.~~2015. CD&H has allocated over $635,000 in CDBG funds to help with revitalization and rehabilitation efforts. ~~The County will continue to monitor and support this area.~~	The County will continue to monitor and support the West Rehoboth Coalition and the West Rehoboth Community Land Trust.	1998 AI, p. 61.
12	2003	"..to address Fair Housing issues in Sussex County, with particular attention to the rapidly growing Hispanic population."	"A strategy should be developed...	In accordance with the County's Affordable and Fair Housing Marketing Plan notices of County CD&H meetings and public hearings are published in at least one Hispanic newspaper or website. The County has instituted a Housing Discrimination Complaint Form (available in English and Spanish) and process for addressing complaints. CD&H attends the annual Hispanic Festival.	The County~~'s Affordable and Fair Housing Marketing Plan will include notices of County CD&H meetings and public hearings in at least one Hispanic newspaper or website. The County will~~ will continue to support DelawareHousingSearch.org~~, a new free and real-time online service that lists all of the state's public and private rental units, as well as publicly-funded for-sale units~~. The site can be entirely read in Spanish and has a bilingual call center available. Each year, the County receives an annual report which lists the accomplishments of this collaborative effort. So long as the program is continuing to result in accomplishments related to fair housing for persons within the Hispanic population, the County will consider its support of this program an effective strategy to meet the stated goal. The County ~~has also now instituted a Housing Discrimination Complaint Form and process.~~will continue to attend the annual Hispanic Festival held in August in Millsboro. At the Festival the County provides various materials related to all County programs and Fair Housing, in English and Spanish.	2003 AI, p. 95.

	AI Report	Goal	Strategies to Meet Goal	Actions Taken to Meet Goal	Actions to be Pursued by County	Notes
13	2011	Increase access to County programs for persons with limited English proficiency (LEP).	"Sussex County should conduct the four-factor analysis outlined in the Federal Register of January 22, 2007, and at www.lep.gov, to determine the extent to which the translation of vital documents is necessary to assist persons with limited English proficiency (LEP) in accessing the County's programs. If it is determined that the need for a Language Access Plan (or LEP plan) exists, the County must prepare the LAP in order to comply with Title VI of the Civil Rights Act of 1964."	Sussex County conducted the four-factor analysis in June 2013, which indicated that only Spanish met the threshold for requiring written translation of vital documents.[xi]	~~Sussex~~The County will ~~conduct the four-factor analysis~~complete, post, and begin implementing a Limited English Proficiency (LEP) Plan. (Timeframe: Announcement on **September 30, 2015;** Implementation Period from **September 30, 2015 to December 31, 2015**)	2011 AI, DSHA/Balance of State Impediment #1, p. 472.
14	2011	"Increase access to County programs for persons with limited English proficiency (LEP)."	"Upon release of updated data from the 2010 U.S. Census, ….Sussex County… should review the data to determine if any of the individual Indo-European languages exceed 1,000 persons with LEP."	Sussex County conducted the four-factor analysis in June 2013, which indicated that only Spanish met the threshold for requiring written translation of vital documents.	~~Sussex~~The County will ~~conduct the four-factor analysis~~complete, post, and begin implementing a Limited English Proficiency (LEP) Plan. (Timeframe: Announcement on **September 30, 2015**; Implementation Period from **September 30, 2015 to December 31, 2015**)	2011 AI, DSHA/Balance of StateImpediment #1, p. 472

	AI Report	Goal	Strategies to Meet Goal	Actions Taken to Meet Goal	Actions to be Pursued by County	Notes
15	2011	"Provide home ownership opportunities to minority households throughout the Balance of State through increased employment opportunities, home ownership counseling, and homebuyer education."	"Strengthen partnerships with local lenders that will offer homebuyer education and other incentives to purchase a home in the Balance of State." Elsewhere in the AI addressing this goal, it states: "Identify effective ways for …Sussex County… to increase home ownership among minorities, residents of LMI census tracts, and LMI residents. Such methods include: (a) Increasing sustainable home ownership opportunities through financial literacy education including credit counseling and pre- and post-home purchase education; (b) Increasing lending, credit, and banking services in LMI census tracts and minority census tracts; and (c) Increasing marketing and outreach efforts of affordable mortgage products that are targeted for residents of LMI census tracts, LMI residents, and minorities."	Sussex County held its inaugural Homebuyer Fair on September 27, 2014. Attendees of the free event receive copies of their credit report, a brief one-on-one session with a HUD-approved housing counselor, and access to 45+ exhibitors with various resources related to homeownership and financial empowerment. The County does a direct mailing to all residents living within the 14-identified impacted communities. The fair will continue to be held annually each September, in partnership with the Delaware State Housing Authority, Sussex County Association of Realtors, NCALL Research, and First State Community Action Agency. The 2015 fair was held on September 26, 2015.	Because credit history is a major reason for denial of home mortgage applications in Sussex County, the County will coordinate with HUD- approved housing counseling agencies, as well as financial literacy organizations to target credit repair education through existing advocacy organizations that work with minority and LMI residents on a regular basis. Specifically, the County will partner with The Money School to introduce financial literacy and credit repair courses to the County's low-income communities. Further, once the data from the Impacted Communities Study is compiled and released, the County will also be able to assist those communities that have specifically identified financial literacy as a need for their community. (Timeframe: **July 1, 2016 – June 30, 2017**) The County will continue its annual Homebuyer Fair.	2011 AI, DSHA/Balance of State Impediment #2, p. 473
16	2011	"Increase the supply of affordable housing in the Balance of State available to households making 80% or less of the median household income."	"Sussex County should continue to offer the SCRP and the MPHU programs to provide incentives to property ~~owners~~owners and investors to build affordable housing." "Developers should be made aware that the cost offset allocations and density bonuses can defray the cost of creating the required affordable units."	The County has passed legislation to increase the reach of the MPHU program to households earning 50% to 120% of MHI.	~~The County has introduced legislation to increase the reach of the MPHU program to households earning 50% to 120% of MHI.~~ The County will also continue to participate in the NSP 1 and NSP 2 programs. The County will add the availability of the sewer deferment incentive to the existing Affordable Housing Support Policy in order to raise public awareness of this incentive and encourage its use. (Timeframe: **November 30, 2015**) The County is evaluating the effectiveness of the MPHU and SCRP programs and will be identifying barriers to their use and any structural problems within the programs (Timeframe: **October 1, 2015 – June 1, 2017**). Depending upon the results of this evaluation, the County will consider expanding incentives offered to developers to participate in the MPHU and SCRP programs and to developers of affordable housing developments who are able to provide a guarantee to the County of the affordability of the dwelling units. If the programs are determined to be ineffective because they are not being utilized, the County intends to determine what barriers associated with those programs are	2011 AI, DSHA/Balance of State Impediment #3, p. 474.

	AI Report	Goal	Strategies to Meet Goal	Actions Taken to Meet Goal	Actions to be Pursued by County	Notes
					responsible. In the meantime, the County will develop a fact sheet that will discuss the cost offset allocation and density bonus incentives within the MPHU and SCRP programs and insert the fact sheet into the application materials for these programs. (Timeframe: **January 1, 2016**)	
17	2011	"Increase the supply of affordable housing in the Balance of State available to households making 80% or less of the median household income."	"Sussex County should play a more proactive role in seeking out and encouraging developers to participate in the MPHU and SCRP programs."	The County has passed legislation to increase the reach of the MPHU program to households earning 50% to 120% of MHI.	The County ~~has introduced legislation to increase the reach of the MPHU program to households earning 50% to 120% of MHI. The County will also continue to participate in the NSP 1 and NSP 2 programs.~~ ~~The~~is evaluating the effectiveness of the MPHU and SCRP programs and will be identifying barriers to their use and any structural problems within the programs (Timeframe: **October 1, 2015 – June 1, 2017**). Depending upon the results of this evaluation, the County will consider expanding incentives offered to developers to participate in the MPHU and SCRP programs and to developers of affordable housing developments who are able to provide a guarantee to the County of the affordability of the dwelling units. If the programs are determined to be ineffective because they are not being utilized, the County intends to determine what barriers associated with those programs are responsible. In the meantime, the County will develop a fact sheet that will discuss the cost offset allocation and density bonus incentives within the MPHU and SCRP programs and insert the fact sheet into the application materials for these programs. (Timeframe: **January 1, 2016**)	2011 AI, DSHA/Balance of State Impediment #3, p. 443, 475.
18	2011	Increase the supply of affordable housing in the Balance of State available to households making 80% or less of the median household income.	"…Sussex County should expand other incentives for property owners and investors to build new affordable rental and owner units in the non-impacted areas of the County, including the reduction or waiver of impact and planning fees and streamlined approval of development projects that feature affordable housing components." "County and local government entities throughout the State of Delaware should reduce and/or waive their respective sewer, water, and/or public facilities and services impact fees for area developers and non-profit organizations seeking to build affordable units, both renter and owner units."		~~The County will consider expanding incentives offered to developers to participate in the MPHU and SCRP programs and to developers of affordable housing developments who are able to provide a guarantee to the County of the affordability of the dwelling units.~~ As mentioned in #2 above, the County has instituted and will be assessing the success of the impact fee deferral incentive. If the incentive is utilized in the development of affordable rental and/or owner units, then the County will consider this incentive successful.	2011 AI, DSHA/Balance of State Impediment #3, p. 475. 2011 AI, Regional Plan Impediment #4.

	AI Report	Goal	Strategies to Meet Goal	Actions Taken to Meet Goal	Actions to be Pursued by County	Notes
19	2011	Increase the supply of accessible, affordable housing in the Balance of State.	"Conduct a statewide study to determine the supply/demand characteristics of housing for persons with mobility and sensory impairments.	Community and Choice: Housing Needs for People with Disabilities in Delaware was released by the Delaware Housing Coalition & the Housing Sub-Committee of the Governor's Commission on Community Based Alternatives for People with Disabilities in April 2012. The report is comprehensive and addressed mobility and sensory impairments. As a result, the County believes this strategy has been completed.	~~The County will review this report and determine if any action on the part of the County is necessary.~~	2011 AI, DSHA/Balance of State Impediment #4
20	2011	Ensure DSHA policies affirmatively further fair housing and meet all applicable HUD requirements.	"In developing policy priorities for entitlement investment in affordable housing, ….Sussex County should give first consideration to the use of CDBG and HOME funds for new family rental and for-sale housing developments on sites in non-impacted areas."	DSHA has modified their application processes for the HDF and Tax Credit programs. These changes now promote and give incentives to developers to build new rental and for-sale housing in non-impacted areas. As a result, the County believes this ~~impediment~~strategy has been ~~addressed~~completed.		2011 AI, DSHA/Balance of State Impediment #5, p. 477
21	2011	Establish fair housing as a priority in the County's long-range planning.	"Develop a statement summarizing the County's overarching policies aimed at affirmatively furthering fair housing choice in both the private and public sectors. The stated policies should extend to all municipalities and unincorporated areas throughout the County. The County's 2012 Comprehensive Plan Update should include this policy statement."		The County will include this information in next Comprehensive Plan Update and will mention Council's Fair Housing Policy Resolution and the Affordable and Fair Housing Marketing Plan. (Timeframe: **October 2015 – 2017**)	2011 AI, DSHA/Balance of State Impediment #8, p. 479

	AI Report	Goal	Strategies to Meet Goal	Actions Taken to Meet Goal	Actions to be Pursued by County	Notes
22	2011	Establish fair housing as a priority in the County's long-range planning.	"During the process of developing the County's 2012 Comprehensive Plan Update, the following should be included: (a) a detailed strategy for increasing the supply of affordable rental housing for families in non-impacted areas; (b) a detailed strategy for expanding the supply of rental housing accessible to persons with mobility impairments; (c) a leadership role should be established for the County in relation to the nature and extent of technical assistance, training, and funding that the County is prepared to provide to municipalities and unincorporated areas; and (d) stated goals to expand the supply of affordable rental housing for families that is within proximity to entry level and/or lower skill jobs."		The County will work with OSPC and DSHA to address the issues mentioned and will include a discussion of those issues in the 2017 Comprehensive Plan Update. (Timeframe: **October 2015 – 2017**)	2011 AI, DSHA/Balance of StateImpediment #8, p. 479
23	2011	Establish fair housing as a priority in the County's long-range planning.	"Collaborate with affordable housing developers to select sites, construct infrastructure, provide financial subsidies, and otherwise support the expansion of affordable housing, including rental units for lower income families."	To assist Diamond State Community Land Trust (DSCLT), Habitat for Humanity, and Milford Housing Development Corporation in acquiring certain funding to pursue develop of a number of affordable housing units, the County supplied letters of support to DSHA and certification to FHLBank.[xii] This action on the part of the County is an example of the County's implementation of its new Affordable Housing Support Policy and Template Support Letter.	The County will ~~formalize~~continue to implement its new Affordable Housing Support Policy and utilize its Template Support Letter. The County intends to assess the success of this new policy concurrent with the assessment of the impact fee deferral incentive (**July 2015 – July 2018**). Afterwards, and if warranted, the County will pursue new financial incentives for affordable housing development which may include formalizing a package of incentives to be offered to developers of affordable housing ~~communties~~communities that can provide a guarantee to the County of the ultimate affordability of the units. The County will work with the Office of State Planning and Coordination (OSPC) and DSHA to determine the appropriate steps to addressing the issue of long-range planning for affordable housing~~.~~ as part of the update to the County's Comprehensive Plan. (Timeframe: **October 2015 – 2017**) The County is evaluating the effectiveness of the MPHU and SCRP programs and will be identifying barriers to their use and any structural problems within the programs (Timeframe: **October 1, 2015 – June 1, 2017**). Depending upon the results of this evaluation, the County will consider expanding incentives offered to developers to participate in the MPHU and SCRP programs and to developers of affordable housing developments who are able to provide a guarantee to the County of the affordability of the	2011 AI, DSHA/Balance of State Impediment #8, p. 479 - 480

	AI Report	Goal	Strategies to Meet Goal	Actions Taken to Meet Goal	Actions to be Pursued by County	Notes
					dwelling units. If the programs are determined to be ineffective because they are not being utilized, the County intends to determine what barriers associated with those programs are responsible.	
24	2011		"Facilitate and promote land use policies and recommendations that enable an increase in the supply of affordable rental housing in areas with adequate infrastructure."		The County will work with the Office of State Planning and Coordination (OSPC) and DSHA to address these issues and will include a discussion of these issues in the 2017 Comprehensive Plan Update. (Timeframe: **October 2015 – 2017**)	2011 AI, DSHA/Balance of State Impediment #8, Strategy C, p. 488

	AI Report	Goal	Strategies to Meet Goal	Actions Taken to Meet Goal	Actions to be Pursued by County	Notes
25	2011	Ensure that local zoning ordinances are in compliance with the Fair Housing Act.	"Sussex County should define specific geographic areas that are suitable for multi-family housing and work towards reducing regulatory barriers that impede such development."	The County's zoning code, combined with the Office of State Planning and Coordination's (OSPC's) Strategies for State Spending define the specific areas in the County that are suitable for multi-family housing. The County drafted a letter to affordable housing developers supporting affordable housing located in areas identified by DSHA as appropriate for affordable housing in their application for changes to their HDF and Tax Credit programs.	~~The~~As part of the 2017 Comprehensive Plan Update, the County will work with the Office of State Planning and Coordination (OSPC) and DSHA ~~to determine the appropriate steps to addressing~~on the issue of long-range planning for affordable housing~~. In addition, the County will consider drafting a letter to affordable housing developers supporting affordable housing located in areas identified by DSHA as appropriate for affordable housing in their application for changes to their HDF and Tax Credit programs~~ in Sussex County. (Timeframe: **October 2015 – 2017**)	2011 AI, DSHA/Balance of State Impediment #9, p. 480
26	2011	Ensure that local zoning ordinances are in compliance with the Fair Housing Act.	"Sussex County should amend its zoning ordinance by lowering the minimum site size standards to encourage the creation of smaller, more affordable residential communities."	The County passed the studio apartment ordinances (Ordinances 1959 & 2245), which address this impediment. As a result, the County considers this strategy ~~implemented~~completed.		2011 AI, DSHA/Balance of State Impediment #9, p. 480.

	AI Report	Goal	Strategies to Meet Goal	Actions Taken to Meet Goal	Actions to be Pursued by County	Notes
27	2011	Ensure that local zoning ordinances are in compliance with the Fair Housing Act.	Sussex County should revise the definition of "family" in its Code to allow more than four unrelated individuals to live together. The current definition unnecessarily restricts housing choice for persons with disabilities because the Code provides no separate definition for a group home and no exception for this use. "Sussex County ....should simplify [its] definition of 'family' by focusing on whether a household functions as a cohesive unit rather than distinguishing between related and unrelated persons. A restrictive definition that limits the number or type of relationship between persons living together as a household unit in a single-family dwelling unit is incompatible with many modern living situations and potentially discriminates against persons with disabilities."	On December 2, 2014, the County voted to adopt an amendment to the Sussex County Zoning Code regarding the definitions of "dwellings" and "family". As a result, the County considers this strategy completed.	~~The County is currently drafting legislation to address this issue.~~	2011 AI, DSHA/Balance of State Impediment #9, p. 443-444; See also 2011 AI, p. 481 ("The definition should not limit the number or type of relationship between persons living together as a household unit in a single-family dwelling unit.")
28	2011	Increase and enhance fair housing outreach and education efforts throughout the County.	Engage HUD-approved housing counselors to target credit repair education through existing advocacy organizations that work extensively with minorities.	NCALL and First State Community Action are the County's partners for the annual Homebuyer Fair. At the Homebuyer Fair, participants can receive a free credit report and a 15-minute meeting with a housing counselor.	Because credit history is a major reason for denial of home mortgage applications in Sussex County, the County will coordinate with housing counseling and financial literacy agencies to target credit repair education through existing advocacy organizations that work with minority populations on a regular basis. Specifically, the County will partner with The Money School to introduce financial literacy and credit repair courses to the County's low-income communities. Further, once the data from the Impacted Communities Study is compiled and released, the County will also be able to assist those communities that have specifically identified financial literacy as a need for their community. (Timeframe: **July 1, 2016 – June 30, 2017**)	2011 AI, DSHA/Balance of State Impediment #11, p. 483

	AI Report	Goal	Strategies to Meet Goal	Actions Taken to Meet Goal	Actions to be Pursued by County	Notes
29	2011	Increase and enhance fair housing outreach and education efforts throughout the County.	Engage in a communication campaign that markets home ownership opportunities to all minorities.	The County is currently implementing the Strong Communities Initiative and an Affordable and Fair Housing Marketing Plan as elements to meet this goal. Sussex County held its annual Homebuyer Fair on September 27, 2014 and September 26, 2015. Advertising of the Fair included a direct mailing campaign to residents in the Impacted Communities. The County supported DelawareHousingSearch.org. The County has attended the annual Hispanic Festival.	The County will ~~be implementing~~continue to implement the Strong Communities Initiative and ~~putting into effect an~~ Affordable and Fair Housing Marketing Plan ~~to meet this goal~~. The County will continue its annual Homebuyer Fair with targeted marketing as set forth in the Affordable and Fair Housing Marketing Plan. The County will continue to support DelawareHousingSearch.org. The County will continue to attend the annual Hispanic Festival held in August in Millsboro. At the Festival, the County provides various materials related to all County programs and Fair Housing, in English and Spanish.	2011 AI, DSHA/Balance of State Impediment #11, p. 483
30	2011		Foreclosures appear to disproportionately affect minority households in the Balance of State. DSHA & Sussex County can mitigate the impacts of foreclosure by supporting increased buyer education and counseling, as well as supporting legislative protections for borrowers to assist them in meeting housing costs.	County CD&H staff currently ~~participate~~participates on the Delaware Mortgage Fraud Task Force. ~~As a result, the County considers this strategy implemented.~~ Sussex County funds numerous non-profit counseling agencies annually through its Human Service Grant program (i.e. DCRAC, First State Community Action, and NCALL) that have foreclosure prevention programs and education curriculums.	The County will partner with The Money School to introduce financial literacy and credit repair courses to the County's low-income communities. Further, once the data from the Impacted Communities Study is compiled and released, the County will also be able to assist those communities that have specifically identified financial literacy as a need for their community. (Timeframe: **July 1, 2016 – June 30, 2017)** The County will send a letter to State legislators in Sussex County making them aware of County's requirement under this AI and expressing general support for future legislation addressing this issue. (Timeframe: **January 1, 2016)**	2011 AI, DSHA/Balance of State Impediment #12, p. 483

	AI Report	Goal	Strategies to Meet Goal	Actions Taken to Meet Goal	Actions to be Pursued by County	Notes
31	2011	Regional collaboration among the various entitlement communities throughout the State is needed in order to remedy segregation and concentration issues that persist in the City of Wilmington.	Encourage county planners and elected officials to consider the risks of failing to think and act regionally in terms of deconcentrating poverty in Wilmington. ~~Conduce~~Conduct AFFH workshops with county planners and elected officials.	Sussex County staff, appointed officials, and elected officials received fair housing training specific to the Fair Housing Act on 6/5/12, 3/8/13, 2/28/14, and 7/23/15.	County CD&H staff will continue to attend AFFH workshops held throughout the State and will present a synopsis of the information to members of County Council. Sussex County staff, appointed officials, and elected officials will continue to receive fair housing training specific to the Fair Housing Act in 2016.	2011 AI, Regional Plan Impediment #6, Strategy D, p. 573
32	2011	There exists a continuing need for quality fair housing education, outreach, training, and real estate testing throughout the State.	Localities throughout the State that have rental property registration, licensing, and/or inspection programs should encourage landlords and property management companies to attend fair housing training by providing a calendar of seminars to be provided in each County. This calendar should be updated regularly, provided at time of initial registration, and posted on various jurisdictional websites. Jurisdictions should work collaboratively to facilitate, coordinate, and market fair housing seminars.	County CD&H updates the News & Events section on the department website regularly. CD&H is represented on the Board of Directors for the National Association of Housing & Redevelopment Officials (DE-NAHRO), which hosts an annual fair housing training every April specific to landlords and property managers.	~~The County will provide a link on its website to~~County CD&H updates the News & Events section on the department website regularly, and will provide links to various fair housing seminars ~~held throughout the State~~throughout the state (Timeframe: **Beginning October 31, 2015**) CD&H will continue to be active on the Board of Directors for the National Association of Housing & Redevelopment Officials (DE-NAHRO), which hosts an annual fair housing training every April specific to landlords and property managers.	2011 AI, Regional Plan Impediment #10, Strategy C, p. 577

Document comparison by Workshare Compare on Wednesday, October 28, 2015 12:08:39 PM

Input:	
Document 1 ID	interwovenSite://WORKSITE02/YCST01/17638006/1
Description	#17638006v1<YCST01> - Sussex County AI Evaluation and Proposed priority Fair Housing Plan (Word Version of Doc Sent to HUD 12/19/2014)
Document 2 ID	interwovenSite://WORKSITE02/YCST01/17638006/4
Description	#17638006v4<YCST01> - Sussex County AI Evaluation and Proposed priority Fair Housing Plan (Word Version)
Rendering set	Standard

Legend:	
Insertion	
~~Deletion~~	
~~Moved from~~	
Moved to	
Style change	
Format change	
~~Moved deletion~~	
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Moved cell	
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Padding cell	

Statistics:	
	Count
Insertions	179
Deletions	56
Moved from	0
Moved to	0
Style change	0
Format changed	0
Total changes	235

[i] The County, through representation on the Board of Directors of DE NAHRO, organized a presentation and proposal by Devona Williams of Goeins-Williams Associates, Inc. from Claymont, Delaware in November 2014. The thought was to coordinate the various governmental jurisdictions throughout Delaware to attend a Diversity Training through DE NAHRO, presented by Goeins-Williams. However, it was determined that all other jurisdictions had diversity and fair housing training curriculums in place.

The idea was ultimately abandoned. The County then pursued a proposal directly from Goeins-Williams Associates for Diversity Training in Sussex County in December 2014. Given the County's Annual Fair Housing Training, as well as the impending release of a County Training Program/Software that could focus on such training material, the County elected to abandon the idea of a third party trainer specific to Diversity Training.

[ii] "CD&H" means Sussex County's Community Development and Housing Department.

[iii] Universal design is subtle and the concept is beneficial to everyone. In July 2012, the Governor signed into law a bill designed by the Coalition requiring that the application process for public funding for the development of new dwelling units now incorporates a point scale for Universal Design features.

[iv] In order to increase the availability of and access to homeownership opportunities with accessibility features, the County will be expanding and coordinating its resources for accessibility modifications for homeowners and homebuyers. Specifically, the County receives emergency repair funding that targets owner-occupied households at or below 80% AMI. The funds are frequently used for minor home modifications for persons with disabilities (ramps, walk-in showers, grab bars, and lifts). In the past, the County has not specifically tracked funding used for this purpose. The County will expand its accounting system to accurately identify the number of households assisted with new accessibility features and modifications.

[v] In order to increase the availability of and access to affordable housing for people with disabilities, the County will assist in the effort to improve asset-building opportunities for people with disabilities. Specifically, the County is working with The Money School (Delaware Financial Literacy Institute) to introduce financial literacy and credit repair courses to Sussex County's low-income rural communities. Our goal is to expand that relationship to include courses applicable and/or targeted to people with disabilities.

[vi] In order to build a community-based system of care with a range of housing options, the County will assist in this effort by prioritizing community-based care by redirecting resources from institutional care to community-based services and providing for housing needs. Specifically, the County will financially support the Money Follows the Person Demonstration for individuals exiting long-term facility care to Sussex County residences and/or Delaware Aging and Disability Resource Center (ADRC), web-based system (&hotline). Both are developed and maintained by DHSS.

[vii] The County and the Delaware State Housing Authority are scheduled to present to the County's Advisory Committee on Aging & Adults with Physical Disabilities on November 16th to discuss the various programs offered by both agencies that are applicable to this committee and the community they represent. Given the widespread attendance of the meeting, such as representatives from the Division of Services for Aging & Adults with Physical Disabilities and the Delaware Aging & Disability Resource Center, representatives from the County and DSHA plan to also host an informal forum and discussion to discuss ways that both agencies can improve their services to this community. This committee will host the 3rd annual LIVE Conference in Georgetown on October 21, 2015, which will be focused on Transportation: Moving Forward. Each year, the conference focuses on major issues that affect Aging and Disability Communities. Last year's conference focused on Accessibility. Further, the committee meets every other month, hosting a speaker at every meeting, advertised to the public in advance.

[viii] It was determined by meeting with the housing advocacy groups that the cost of the sewer impact fee was a significant factor affecting the development of affordable housing. The sewer impact fee deferral will act as a financial incentive for affordable housing organizations by reducing the upfront costs of developing each dwelling unit. The impact fee would not be collected until the land upon which the dwelling unit is located is sold. In the case of a community that was developed utilizing a community land trust model, the land is not sold, only the dwelling unit, so the cost of the sewer impact fee is not paid.

[ix] Chapter 45 of the Sussex County Code is an adoption of ICC/ANSI A117.1-2009. The International Code Council (ICC) is committed to meeting or exceeding the accessibility requirements of the Americans with Disabilities Act (ADA) and the Fair Housing Act (FHA).

[x] The County now includes in its Application for Major Subdivision the following statement, "Sussex County promotes racially/ethnically diverse, mixed income, affordable housing in all areas under its jurisdiction. Accordingly, Developers are encouraged to provide affordable housing opportunities to Sussex County residents in all new developments, affirmatively market those affordable housing units to diverse populations, and meet with the surrounding residents early in the development approval process." The County's Technical Advisory Committee (TAC) reviews every submitted subdivision, and each review letter includes the following statement "Sussex County promotes all forms of affordable housing and encourages the Developer to include affordable housing opportunities in its developments, affirmatively market those affordable housing units to diverse populations, and meet with the surrounding residents early in the development approval process." The County provides comments on all proposed residential projects in Sussex County through the State Planning Office's PLUS process. Those comments encourage developers to provide and finance affordable housing opportunities to Sussex County residents and affirmatively market their units to diverse populations.

[xi] CD&H has translated several vital documents to date and are available on the County's website. In July 2014, the County added a notice in English & Spanish on the County's website under meeting calendar, and each calendar event to indicate the availability of sign language or language interpreters.

[xii] See the County's Fourth Semi-Annual Compliance Report dated December 19, 2014; Exhibit 1.