SOCIAL SERVICES AND COMMUNITY DEVELOPMENT COMMITTEE AGENDA
November 29, 2011
10:00 A.M., Council Chambers

Members:
Myers – Chair
Henson – Vice Chair
Kay
Ford
Lawless
Stinnett
McChord
Ellinger
Lane
Crosbie

1. Approval of Minutes and Motions

2. Discussion about University of Kentucky Student Involvement in Looking at the Landscape of Community Needs

   - Commissioner Beth Mills; Department of Social Services
   - Dean William Hoyt; UK Martin School of Public Policy
   - Dean Ike Adams; UK College of Social Work
   - Associate Dean Karen Badger; UK College of Social Work

3. Community Development Block Grant and the Consolidated Plan

   - Irene Gooding
   - Paul Schoninger

4. Discussion on creating a policy recommendation to full Council about how partner agencies are funded specifically with respect to those who want to give raises to their employees

   - Paul Schoninger

Social Services and Community Development Committee

October 18, 2011

10:00 AM, Council Chambers

Minutes & Motions

Members of the Social Services and Community Development Standing Committee in attendance were Chair George Myers, Vice Chair Peggy Henson, Councilmember Chris Ford, Councilmember Diane Lawless, Councilmember Steve Kay, Councilmember Jay McChord, Councilmember Kevin Stinnett, Councilmember Chuck Ellinger, Councilmember K.C. Crosbie, and Councilmember Ed Lane

Approval of Minutes and Motions

A motion by Kevin Stinnett to Approve Minutes from September 27, 2011, seconded by Ed Lane, the motion passed without dissent.

Continuation of Discussion on How to Leverage New Money for Partner Agency Funding

At the last meeting two motions were discussed: leverage money by working with a third-party agency to pursue new funds for partner agencies; and initiate a comprehensive community needs assessment. CM Myers asked the Committee whether there is interest in going after new funding sources, and if so, how it should be done.

CM Kay framed the issue as a question of whether partner agencies are interested in pursuing extra funds and if they are how the government should go about doing this. A few options would include the government hiring a grant writer or a cooperative effort to work with other agencies that have grant writers.

CM Myers opened the floor to citizens that wish to speak to the issue of how additional money should be leveraged. No citizens chose to speak.

CM McChord asked Chair Myers what he would like to see the Committee bring forward as it relates to pursuing outside funds. CM Myers stated that there have been conversations about either working with a third-party to pursue additional money or hiring someone in-house in order to prevent further cuts to partner agencies. He said part of making a case in the future not to cut partner agencies requires having analytical data to show the positive aspects of funding the partner agencies. CM Myers stated that at the end of the day his goal is to bring more money to the partner agencies and it seems that money will need to come from outside sources as the economy continues to contract.

Discussion with UK around needs assessment

CM Kay asked for Commissioner Beth Mills to provide an assessment as to where the city stands with the needs assessment.

Com. Beth Mills introduced Dean Bill Hoyt, PhD from the University of Kentucky's Martin School of Public Policy, as well as Dean Ike Adams, PhD, and Associate Dean Karen Badger, PhD from the University of Kentucky's College of Social Work.

CM Kay asked Com. Mills for an overview of the studies and data that are already available. Com. Mills said that there are several studies available and she proposes that a starting point for performing a needs assessment would be to have the students do an inventory of all the data that is available in the community.

Dr. Adams, Director of the UK College of Social Work said that he and Dr. Badger previously met to discuss the needs assessment and the use of students within the framework of the partner agency funding proposal. Dr. Adams said that rather than talking about the needs assessment at this meeting, he preferred to discuss the role of the University and how the College of Social Work looks for learning opportunities for the students. One of the reasons he was initially interested in the idea is because he thinks the proposed approach would be an excellent learning opportunity for the students. They have certain requirements according to the Commission of Accreditation that the College of Social Work must abide by when placing students. One requirement is students must be supervised by someone who has an MSW and more than two years of social work experience. That agency will agree to abide by certain learning objectives. Dr. Adams said that his students can make a significant contribution if they have a supervisor that is monitoring the objectives of the needs assessment. He said that graduate students can make a significant contribution with the appropriate supervisors and the educational experience will be of high quality if it is through a partnership with the Martin School which brings certain expertise to the table as well.

Dr. Hoyt, Director of the UK Martin School of Public Policy said that when the discussion initially started the two programs were thinking interns from both programs could contribute to the proposal. Dr. Hoyt said that certain requirements have to be met and he was a little concerned because it look liked faculty could potentially be supervising the internship when the real idea of an internship would be to get students out in the field and mentored outside of the classroom rather than by their professors directly. The professors may give some suggestions but should not be the direct supervisors in the internship.

Dr. Hoyt said in terms of the structure for the curriculum their classes are all in the evening and many of the internships take place in the summer with the two-year program. However, he is currently working on a one-year program which will have to be structured differently and it will still require an internship component. The one year program would be an obvious candidate for this type of internship. Dr. Hoyt has no intention of seeking compensation for internships because they would not be working full-time.

Dr. Hoyt said the difference between using students over faculty is that faculty would require compensation because they have contracts and other obligations. Dr. Hoyt stated that he does not want his students involved in deciding outcomes. Dr. Hoyt said his students can be involved in collecting data but it strikes him that the outcomes would need to be decided by the Council.

CM Myers asked Com. Mills if the Department of Social Services, the UK College of Social Work and the UK Martin School of Public Policy could work within the framework that the Deans described to put a proposal together. Com. Mills stated that she thinks she can work within that framework but the timeframe will be the decision of the University.

CM Myers asked if Dr. Badger, Associate Dean of the UK College of Social Work had anything to add. Dr. Badger stated that the College of Social Work graduate students complete 600 hours in the field between practicums and internships. In the advanced standing model where students have met certain criterion, they do their internships in the spring and summer semesters. Students take a community needs and assessment course prior to entering the field and Dr. Badger said she sees this as a nice opportunity for students to apply their education in a meaningful way.

A motion by Steve Kay to Approve a recommendation to the full Council to support the Commissioner in working with the Deans from the University of Kentucky College of Social Work and Martin School of Public Policy to determine a way forward with regards to conducting a needs assessment with the use of student interns that would meet the University of Kentucky's needs as well as the needs of government, seconded by Jay McChord, the motion passed without dissent.

CM Lane asked Com. Mills how many organizations would need to have needs assessments conducted for them. Com. Mills stated that this would not be agency specific but needs would be assessed community wide.

CM Lane asked Com. Mills if she feels that all of the assessments need to be done simultaneously or if they can be staggered between years. Com. Mills said she thinks that might be prudent.

CM Lane asked if the interns can be paid and expressed his support for paying them as well as paying the professors to ensure that the result is high-quality information. CM Myers stated he is always in support of paying the interns.

Public Comment

The Chair opened the floor to public comment. Corey Dunn called to speak. Mr. Dunn asked about the needs assessment and stated that if government is using the college students, they can also work with the public school system which also employs social workers. The student that he worked with at his program learned a lot by working with the school students.

CM Myers asked Com. Mills when she talks to UK if they can consider how they can work with the local public schools. Com. Mills stated that when they are doing an inventory...

Items in Committee

CM Kay asked about the recommendation regarding partner agencies that give raises and if there would be more information about non-Social Services partner agencies and the way that they are funded. CM Myers stated that when the Committee is ready to start working on that they will have staff gather information and bring it back to the Committee to have a discussion about how all of the agencies are operating, then have a discussion within the Committee about whether they want to make a recommendation to the full Council. CM Myers said that he will work on getting that for the next Committee meeting.

CM Myers asked Com. Mills if she has any thoughts on the recommendation for the Vice Mayor putting together a task force and working on the Senior Citizens Center.

Com. Mills said that there is a Senior Service Commission comprised of 22 members and four ex-officio members that deal in aging services. Com. Mills stated that she is not sure whether the Vice Mayor intends to appoint a separate task force but she is the Chair of that committee. Com. Mills believes that if a new senior citizen center comes forth, it will come from that Commission. Com. Mills stated that she the group is using an AARP model called "Ask Lexington" where they go into neighborhoods and ask questions similar to a needs assessment. Currently they are training facilitators to do the Ask Lexington questions. After that the group will go into any willing neighborhood to identify the aging needs in the community.

CM Myers stated that at the next meeting he will try to have the issue about the partner agencies and raises as well as the Community Development Block Grant on the agenda.

A motion by Ed Lane to Approve adjourn, seconded by K.C. Crosbie, the motion passed without dissent.

Fayette County Needs Assessment Proposal

College of Social Work
Martin School of Public Policy and Administration
University of Kentucky

November 22, 2011

Purpose: The University of Kentucky College of Social Work (COSW) and the Martin School of Public Policy and Administration submit this prospectus designed to assist in assessing the articulated social service needs in Fayette County, Kentucky.

Project Description: It is proposed that the above stated purpose be accomplished via the administering of a needs assessment to agency partners and constituents. The partner agencies include those that fulfill social service as well as economic needs in the community that are geared to improve quality of life and well-being. The needs assessment will consist of three phases: (1) reviewing and mining of existing data gathered by community entities to identify emerging themes and patterns of needs/issues, (2) designing, administering a needs assessment based on identified themes, patterns, and relevant current trends, and (3) analyzing and disseminating the results of the community/agency needs assessment. The COSW and Martin School will work together to complete this task and work within their areas of expertise.

Method: It is estimated that this project will encompass three 4 month periods, beginning at the end of August, 2012 and continuing through December, 2013 (coinciding with the Fall, Summer, and Spring semesters in the UK Academic Calendar). The means through which the College of Social Work and the Martin School plan to address these responsibilities are outlined below.

College of Social Work: This project will be housed in the Master of Social Work Community and Social Development concentration as a site within which graduate social work students may fulfill their field practicum curriculum requirements. The graduate social work curriculum consists of two field placements, each requiring 300 hours of time. COSW will place 4-5 graduate students at this site for both semesters of their practica.

Graduate students who will be eligible for this placement and project will be either (1) advanced standing graduate students (graduate students who have earned an accredited social work undergraduate degree with a cumulative GPA of 3.0 or higher and a social work major GPA of 3.5 or higher), or (2) second year social work graduate students who have completed foundation graduate work and are in their specialization year of study. These students will have successfully completed their foundational research curriculum and will have either completed or be enrolled in the advanced research course and/or concentration specialization courses (e.g. Poverty and Inequality, Community Assessment, and Community Interventions), which will support their work on this project.

A designated COSW faculty member will assist in constructing the learning contract and provide general oversight and continuity to the needs assessment project. A COSW PhD student will be engaged to attend to the ongoing operation of the COSW student project component. In addition, in accordance with expectations of our accreditation body (Council on Social Work Education) regarding field placements, we will need Lexington-Fayette Urban County Government (LFUCG) to support the COSW by providing on-site student supervision and to assist with arranging other activities in which they can participate to address required competencies. Although much of the project under discussion is not place-based, we anticipate there will be times the students will need an office or meeting space at LFUCG.

***Martin School of Public Policy and Administration*:** This project will be undertaken by a group of 4 – 5 students in the Master of Public Policy (MPP) or Master of Public Administration (MPA) programs as their internship, a requirement of both degree programs. The internship requires 400 hours of time on the project. Students will be engaged in this project while undertaking the Martin School curricula that includes courses on quantitative and qualitative analysis, budgeting, and program evaluation. The coursework in the Martin School is scheduled so that courses focusing on analysis and program evaluation are taken at the beginning of the program.

A designated Martin School faculty member will develop a learning contract and provide oversight on the project. A Martin School staff member, with an MPP herself, will provide oversight and assistance on the ongoing operations.
Deliverables: At the end of each semester the students will present a summary of their progress to the Council orally and via written reports. The project will culminate in the dissemination of the needs assessment process and findings via a written report and oral presentation.

Suggested Budget Requirements: We anticipate that a joint budget of $35,000 to successfully complete this project. These funds would be allocated among the two UK entities to cover the Project's day to day operation ($2,000) to include faculty ($5,000), staff ($12,000), and/or Ph. D ($16,000) student support.

Lexington Fayette Urban County Government

Receives annual funding from the

THE U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT
OFFICE OF COMMUNITY PLANNING AND DEVELOPMENT (CPD)

From the following grant programs

COMMUNITY DEVELOPMENT BLOCK GRANT PROGRAM (CDBG)

Lexington is an entitlement city under this program. The amount of each annual entitlement grant is determined by statutory formula, which uses several objective measures of community need, including poverty, population, housing overcrowding, age of housing, and growth lag.

Legal Authority: Title I, Housing and Community Development Act of 1974 (42 U.S.C. 5301 et seq.). Regulations are at 24 CFR part 570.

Requires no local match.

HOME INVESTMENT PARTNERSHIPS PROGRAM (HOME)

Lexington is a participating jurisdiction under this program. HOME funds are allocated using a formula designed to reflect relative housing need.

Legal Authority: Title II of the Cranston-Gonzalez National Affordable Housing Act (42 U.S.C. 12701 et seq.). Regulations are at 24 CFR part 92.

Requires match equal to 25% of federal funds minus amounts expended for administration and CHDO operating costs.

EMERGENCY SHELTER GRANTS PROGRAM (ESG), SOON TO BE KNOWN AS EMERGENCY SOLUTIONS GRANT

Lexington is a formula city under this program. HUD allocates the fiscal year appropriation for ESG to eligible recipients in accordance with the percentage of CDBG funding each jurisdiction was allocated for the previous fiscal year.

Legal Authority: Subtitle B of Title IV of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11371-11378). Regulations are at 24 CFR part 576.

Requires a 50% match (may be in-kind).

The Homeless Emergency Assistance and Rapid Transition to Housing Act of 2009 (HEARTH Act) was signed into law on May 20, 2009 (Public Law 111-22). The HEARTH Act amends Subtitle B of Title IV of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11371-11378) to rename the program the Emergency Solutions Grants program, expand the range of eligible activities under the program, and add or change certain program requirements. The Interim Rule for this program was published on November 15, 2011.

THE CONSOLIDATED PLAN

Federal regulations require that Lexington-Fayette Urban County Government prepare one document (The Consolidated Plan) in which it states how it will pursue goals for all community planning and development programs. The overall goal of community planning and development programs to be covered by the Consolidated Plan is the development of viable urban communities by providing

- **decent housing**
- **a suitable living environment**
- **expanding economic opportunities**

principally for low- and moderate-income persons.
The federal regulations that govern Consolidated Submissions for Community Planning and Development Programs are codified at 24 CFR part 91 (91.1-91.236 and 91.500-91.600).

The functions of the Consolidated Plan are:

- **a planning document for Lexington-Fayette County , which builds on a participatory process;**
- **an application for federal funds under HUD's formula grant programs: Community Development Block Grant Program (CDBG), the Emergency Shelter Grants Program (ESG), and the HOME Investment Partnerships Program (HOME);**
- **a strategy to be followed in carrying out HUD programs; and**
- **an action plan that provides a basis for assessing performance**

The receipt of other HUD funds also requires that the jurisdiction have a Consolidated Plan that is approved by HUD or that the application for other HUD funds contain a certification that the application is consistent with a HUD-approved Consolidated Plan.

CITIZEN PARTICIPATION PLAN

Communities must adopt and follow a Citizen Participation Plan for the Development of a Consolidated Plan.

The Citizen Participation Plan must provide for and encourage citizens to participate in the development of the consolidated plan, any substantial amendments to the consolidated plan, and the performance report. Citizen Participation Plan must provide for at least two public hearings, one of which must be conducted prior to drafting of the plan, and must provide for public notice of the publication of the draft plan and for the publication of the annual performance report.

Changes to Lexington's Citizen Participation Plan must be approved by Council, providing for adequate notice to citizens of changes.

CONTENTS OF THE CONSOLIDATED PLAN

Every three or five years (jurisdiction's choice), a complete consolidated plan consisting of the following information must be submitted in accordance with instructions prescribed by HUD (including tables and narratives):

CONSULTATION/COORDINATION **- with continuum of care and public and private agencies that provide health services, social and fair housing service agencies, including those focusing on services to children, elderly persons, persons with disabilities, persons with HIV/AIDS and their families, homeless and chronically homeless persons.**

CITIZEN PARTICIPATION **-- Based on the jurisdiction's current citizen participation plan, provide a summary of the citizen participation process used in the development of the consolidated plan.**

HOUSING AND HOMELESS NEEDS ASSESSMENT

Housing Needs -- The jurisdiction must provide an estimate of housing needs projected for the next five-year period. This includes an estimate of the number and type of families in need of housing assistance for extremely low-income, low-income, moderate-income, and middle-income families, for renters and owners; and the specification of such needs for different categories of persons, including elderly persons; single persons; large families; public housing residents; families on the public housing and Section 8 tenant-based waiting list; persons with HIV/AIDS and their families; victims of domestic violence, dating violence, sexual abuse and stalking; persons with disabilities; and a discussion of specific housing problems, including cost-burden, severe cost- burden, substandard housing, and overcrowding (especially large families) experienced by extremely low-income, low-income, and moderate-income renters and owners compared to the jurisdiction as a whole. The terms "standard condition" and "substandard condition but suitable for rehabilitation" must be defined in the plan.

Homeless Needs -- The jurisdiction must provide a concise summary of the nature and extent of homelessness in the jurisdiction, (including rural homelessness and chronically homeless persons where applicable), addressing separately the need for facilities and services for homeless persons and homeless families with children, both sheltered and unsheltered, and homeless subpopulations.

Special Needs Populations -- The jurisdiction must estimate, to the extent practicable, the number of persons in various subpopulations that are not homeless but may require housing or supportive services, including the elderly, frail elderly, persons with disabilities (mental, physical, developmental, persons with HIV/AIDS and their families), persons with alcohol or other drug addiction, victims of domestic violence, and any other categories the jurisdiction may specify and describe their supportive housing needs.

Lead-Based Paint Needs -- The jurisdiction must estimate the number of housing units that contain lead-based paint hazards, as defined in section 1004 of the Residential Lead-Based Paint Hazard Reduction Act of 1992, and are occupied by extremely low-income, low-income, and moderate-income families.

HOUSING MARKET ANALYSIS

General Characteristics -- Based on information available to the jurisdiction the consolidated plan must describe the significant characteristics of the housing market in terms of supply, demand, condition, and the cost of housing; the housing stock available to serve persons with disabilities; and to serve persons with HIV/AIDS and their families.

Public Housing -- In cooperation with the public housing agency or agencies located within its boundaries, the plan must provide a concise summary of the needs of public housing, including identifying the public housing developments in the jurisdiction, the number of public housing units in the jurisdiction, the physical condition of such units, the restoration and revitalization needs of public housing projects within the jurisdiction, and other factors, including the number of families on public housing and tenant-based waiting lists.

Assisted Housing -- The jurisdiction shall also include a description of its number and targeting (income level and type of household served) of units currently assisted by local, state, or federally funded programs, and an assessment of whether any such units are expected to be lost from the assisted housing inventory for any reason, (i.e. expiration of Section 8 contracts).

Homeless Inventory -- The jurisdiction shall provide a concise summary of the existing facilities and services (including a brief inventory) that assist homeless persons and families with children and subpopulations.

Special Need Facilities and Services -- The plan must also describe, to the extent information is available, facilities and services that assist persons who are not homeless but require supportive housing, and programs for ensuring that persons returning from mental and physical health institutions receive appropriate supportive housing.

Barriers to Affordable Housing -- This section requires the jurisdiction to explain whether the cost of housing or the incentives to develop, maintain, or improve affordable housing are affected by public policies, particularly those of the local jurisdiction.

STRATEGIC PLAN

The jurisdiction must produce a strategic plan for a period designated by the jurisdiction that brings needs, priority needs, priorities, specific objectives, and strategies together in a coherent strategic plan. In identifying and describing its needs, the jurisdiction is encouraged to draw relevant information from previous submissions and other reports and studies, as appropriate. The strategic plan must demonstrate how the jurisdiction will provide new or improved availability/accessibility, affordability, sustainability of decent housing, a suitable living environment, and economic opportunities, principally for low- and moderate-income persons.

Priority Needs Analysis and Geographic Distribution -- The jurisdiction must indicate the priorities for allocating investment geographically and among different activities and needs.

Specific Objectives -- The jurisdiction's strategic plan must summarize priorities and specific objectives it intends to initiate and/or complete in accordance with the tables prescribed by HUD. Each specific objective developed to address a priority need, must be identified by number and contain proposed accomplishments and outcomes the jurisdiction expects to achieve in quantitative terms through related activities over a specified the time period.

Specific Objectives are required for the following:

HOUSING
HOMELESS
SPECIAL NEEDS POPULATIONS
COMMUNITY DEVELOPMENT
CROSS CUTTING ISSUES

- **Lead-based Paint**
- **Barriers to Affordable Housing**
- **Antipoverty Strategy**
- **Institutional Structure**
- **Monitoring Strategy**

Describe the standards and procedures it will use to monitor its housing and community development activities and ensure long-term compliance with program requirements and comprehensive planning requirements

CONSOLIDATED ACTION PLAN - ONE YEAR PLAN

In this section, the jurisdiction must provide a concise summary of the actions, activities, and programs that will take place during the next year to address the priority needs and specific objectives identified by the strategic plan. The action plan, that is submitted annually, must identify the linkage between the use of federal resources and the specific objectives developed to address priority needs identified in the strategic plan.

Annual plan includes the following:

Citizen Participation and Consultation
Sources of Funds
Statement of Specific Annual Objectives
Description of Activities
Outcome Measures
Allocation Priorities and Geographic Distribution
Annual Affordable Housing Goals
Needs of Public Housing
Homeless and Other Special Populations
Barriers to Affordable Housing
Antipoverty Strategy
Lead-Based Paint Hazards
Coordination
Monitoring

In addition each of the federal programs has specific annual submission requirements.

In preparing its Consolidated Plan, Lexington uses the CPMP (Consolidated Plan Management Process) tool that was developed by and recommended by HUD. This is a tool to assist formula grantees in meeting the requirements of its 3- or 5 year Strategic Plan, up to 5 annual plans, and up to 5 Consolidated Annual Performance and Evaluation Reports (CAPER).

HIGHLIGHTS OF LEXINGTON'S 2010 CONSOLIDATED PLAN
MOST RECENT FIVE-YEAR PLAN
HIGHLIGHTS

Executive Summary

The Lexington-Fayette Urban County Government's 2010 Consolidated Plan represents the jurisdiction's goals and objectives for addressing housing and community development needs for the five-year period July 1, 2010 through June 30, 2014. The goals in the Consolidated Plan include the provision of safe and affordable housing for low- and moderate-income persons, homeless persons, and for persons with special needs; public improvements and neighborhood revitalization in low- and moderate-income neighborhoods; renovation of buildings and sites in the community that are used for the provision of social services to low-income persons; and provision of services that will positively impact social and economic conditions for low-income persons.

Monitoring

Activities will be monitored primarily by two methods: monitoring review and financial audit. The monitoring review involves the use of a checklist by a Grants Manager on an annual scheduled monitoring visit to agencies who have been awarded funds from these federal programs. Subgrantees/Subrecipients who are exhibiting poor performance will be visited at least a second time. During the five-year period, the Lexington-Fayette Urban County Government will use a risk analysis of grantees to streamline the monitoring process so that more time can be concentrated on poor performers with abbreviated monitoring for subgrantees/subrecipients who have a history of compliance.

The monitoring visits will include:

- Is the sugrantee/subrecipient operating the program for which it was funded?
- Timeliness of project
- Does the project generate program income and is program income properly documented and reported to the LFUCG?
- If the program has beneficiaries, are individual client files maintained, is income verified, how many clients have been served?
- Internal controls will be monitored for the following: accounting system, procurement process, inventory controls, check approval process, check signature process, payroll process, timesheets, tax returns, workman's compensation, equal employment opportunity, open positions advertised, fair housing posters displayed, minority business outreach.
- Annual audits will be monitored for findings and concerns

Housing Needs in Lexington-Fayette County

Total households = 117,480
Renters = 48,020 (41%)
Owner Occupants = 69,455 (59%)

26% of Owner Occupants are low- and moderate-income

69% of renter households are low- and moderate-income

Low income is defined as household income at 50% or below area median income
Moderate income is defined as household income at 80% or below area median income
Extremely low-income is defined as household income at 30% or below area median income

The primary housing problem facing low-income Lexington residents is cost

Of all household problems, the two most prevalent are (1) severe cost burden defined as paying greater than 50% of income for housing, and (2) moderate cost burden defined as paying 30.1%-50% of income for housing.

For all renter households, 10,970 are severely cost-burdened, and 8,855 are moderately cost burdened.

For all owner households, 5,045 are severely cost-burdened and 9,790 are moderately cost burdened.

Of the 13,180 renters whose incomes are < or = 30% of AMI, 66% (8,710) are severely cost burdened.

Among 9,220 renter households who are 30.1 % to 50% of AMI, 22% (2,030) are severely cost burdened.

16% of all households are moderately cost-burdened. Almost all of these households are below 80% of median income.

14% of all households are severely cost-burdened. Almost all of these households are below 50% of median income.

Assisted units of all kinds number 7,575 in the community. These include public housing, Section 8 Housing Choice Vouchers, and other federally assisted units (privately owned). With an estimated 22,400 renter households with incomes <50% of AMI, only 34% can be accommodated in assisted housing.

FAIR MARKET RENTS (FMR) Including Utilities

Unit size (# of bedrooms)	2009 FMR	Annual Income needed to afford FMR	Hourly rate needed (fulltime)
0 bedroom	$ 458	$ 18,320	8.98
1 bedroom	$ 551	$ 22,040	10.80
2 bedroom	$ 679	$ 27,160	13.36
3 bedroom	$ 913	$ 36,250	17.77
4 bedroom	$ 941	$ 37,640	18.45

According to National Low Income Housing Coalition 2009 Out of Reach study, the mean renter wage is $11.98.

2010 CONSOLIDATED PLAN
5-YEAR STRATEGIC PLAN
JULY 1, 2010-JUNE 30, 2015

Specific Housing Objectives

The Lexington-Fayette Urban County Government's goal for affordable housing is to ensure the provision of safe and affordable housing opportunities, both rental and homeownership, within the community for all low-income persons and to provide for maximum consumer choice in location of housing.

The specific priorities shall be the housing needs of persons who are extremely low-income (<=30% of AMI) and those who are very low-income (30.1% to 50% of AMI). There is also a priority for the development of homeownership opportunities for households who are 50.1% to 80% of median income.

Increase in Rental Housing Units

Increase in homeownership rates

Housing Counseling

Southend Park Urban Village

The Lexington-Fayette Urban County Government also expects to begin Phase I of the redevelopment of the Southend Park Urban Village (Lower Davistown). This development plan is the result of a major transportation project that will extend Newtown Pike from Main Street over to South Limestone Street. The purposes of the plan are to mitigate the social, economic and environmental impacts of this road improvement project on low-income residents living in the area. Phase I consists of the construction of 27 units of single family housing units.

Rehabilitation of existing units

For the purpose of providing existing low-income (at or below 80% of AMI) owner occupant households with the opportunity to bring their housing up to code, become more energy efficient, and to make modifications for handicap accessibility, the jurisdiction will continue to operate a single family housing rehabilitation program that provides eligible households who are at 50% or below of AMI with deferred loans, and low-interest loans to those households who above 50% of AMI and at or below 80% of AMI.

Neighborhood Stabilization Program

Housing for Special Populations

Homeless Strategic Plan

Community Development

Public Improvements

Improvements to the Meadows-Northland-Arlington area located in census tracts 13, 14, and 15 will continue. This is an older neighborhood whose drainage facilities are inadequately sized with too few catch basins and some streets constructed without curbs. Historically, the neighborhood has had numerous drainage problems. A Storm Sewer Assessment was completed in October 1997, for the purpose of serving as a guide to the drainage and street right-of-way improvements in this neighborhood. The proposed improvements included constructing new catch basins and pipes and replacing existing inlets and pipes, complete or partial reconstruction of the pavements, curb and gutters, and sidewalks and the construction of eight detention basins. Total cost of these public improvements has been estimated at $30 million and will take approximately twenty years to complete. The Lexington-Fayette Urban County Government began work on this project in 1998.

2010--Morgan Avenue, from Bryan Avenue to Oak Hill Drive, includes the 400 block of Morgan Avenue;
includes construction of curbs, gutters and sidewalks, street reconstruction and storm sewer improvements.
[MNA 3D] ***Estimated Cost: $865,000***

2011--Construct storm sewer systems from Parkview Drive and Oak Hill Drive to near Morgan Avenue, to accommodate improvements in Phases 5 and 2; includes considerable work in the 400 blocks of Carlisle and Locust Avenues;
[MNA 5A] ***Estimated Cost: $450,000 + $885,000 sanitary sewer***

2012--Oak Hill Drive, from Highland Park Drive to Shawnee Avenue, includes the 1000-1400 blocks of Oak Hill Drive;
includes replacement of curbs, gutters and sidewalks, street reconstruction, storm sewer improvements and replacement of the sanitary sewer within public right of way.
[MNA 5B] ***Estimated Cost: $1,530,000 + $448,000 sanitary sewer***

2013--Locust Avenue, from Bryan Avenue to Oak Hill Drive, includes the 400 block of Locust Avenue;
includes replacement of curbs, gutters and sidewalks, street reconstruction, storm sewer improvements and replacement of the sanitary sewer within public right of way.
[MNA 5C] ***Estimated Cost: $1,025,000 + $300,000 sanitary sewer***

2014--Carlisle Avenue, from Bryan Avenue to Oak Hill Drive, includes the 300 and 400 blocks of Carlisle Avenue;
includes replacement of curbs, gutters and sidewalks, street reconstruction, storm sewer improvements and replacement of the sanitary sewer within public right of way.
[MNA 5D] ***Estimated Cost: $1,185,000 + $348,000 sanitary sewer***

Public Services (LIMITED TO 15% OF THE FEDERAL AWARD PLUS PROGRAM INCOME)

<u>**Special Populations**</u>
<u>**Youth Programs**</u>
<u>**Hispanic Population**</u>
<u>**Housing Counseling for First-Time Homebuyers**</u>

Economic Development

Fair Housing

ELIGIBLE USES OF CDBG FUNDS

Property acquisition
Public facilities and improvements.
Clearance activities.
Public Services—15% limit
Relocation of businesses and households when required.
Economic Development
Special Economic Development Activities.
Rehabilitation and Preservation Activities.
Planning and Administration activities.

INELIGIBLE ACTIVITIES UNDER CDBG

The following activities may not be assisted with CDBG funds:

- **Buildings or portions thereof, used for the general conduct of government, except for the removal of architectural barriers.**
- **General government expenses**
- **Political activities**

Unless carried out by an eligible Community-Based Development Organization, the following activities are generally ineligible for CDBG funding:

- **Purchase of equipment**
- **Operating and maintenance expenses, except for those associated with public service activities**
- **New housing construction**
- **Income payments**

NATIONAL OBJECTIVES

Entitlement communities develop their own programs and funding priorities; however, grantees must give maximum priority to activities which benefit low- and moderate-income persons. Over a one-to-three year period (specified by grantee), at least 70 percent of the grantee's CDBG expenditures (after excluding certain planning and administrative costs) must be devoted to activities benefiting low- and moderate-income persons (80 percent or less of area median income). This is the primary national objective. A grantee may also carry out activities which aid in the prevention or elimination of slums or blight. Additionally, grantees may fund activities when the grantee certifies that the activities meet other community development needs having a particular urgency because existing conditions pose a serious and immediate threat to the health or welfare of the community where other financial resources are not available to meet such needs. CDBG funds may not be used for activities which do not meet one of these three national objectives.

USES OF HOME FUNDS

HOME funds may be used by a participating jurisdiction to provide incentives to develop and support affordable rental housing and homeownership affordability through the acquisition of real property (including assistance to homebuyers), new construction, reconstruction, or moderate or substantial rehabilitation of non-luxury housing with suitable amenities, including real property acquisition, site improvements, conversion, demolition, and other expenses, including financing costs, relocation expenses of any displaced persons, families, businesses, or organizations, to provide tenant-based rental assistance, including security deposits; to provide payment of reasonable administrative and planning costs; and to provide for the payment of operating expenses of community housing development organizations. The housing must be permanent or transitional housing, and includes permanent housing for disabled homeless persons, and single-room occupancy housing.

HOME funds may only be used for housing for low- and moderate income families.

Qualification as Affordable Rental Housing

A rental housing project qualifies as affordable housing only if the project bears rents not greater than the lesser of the fair market rent for existing housing for comparable units in the area as established by HUD, or a rent that does not exceed 30 percent of the adjusted income of a family whose gross income equals 65 percent of the median income for the area, as determined by HUD

Qualification as affordable housing: Homeownership:

- Housing is deemed affordable if it has an initial purchase price that does not exceed 95% of the median purchase price for the jurisdiction as determined by HUD and is supported by an appraisal; for Fayette County the maximum purchase price is $150,000.

- Property must be principal residence of an owner whose family qualified as a low-income family at the time of purchase.

COMMUNITY HOUSING DEVELOPMENT ORGANIZATIONS:

The participating jurisdiction must allocate at least 15 percent of its annual formula allocation for investment only in housing to be developed, sponsored, or owned by community housing development organizations (CHDOs). A CHDO is an organization which is organized under state law, is operated as a nonprofit organization, has a tax exemption ruling from the Internal Revenue Service under Section 501(c)(3) or (4), has among its purposes the provision of decent housing that is affordable to low- and moderate-income people, has a demonstrated capacity for carrying out activities assisted with HOME funds, has a history of serving the community within which housing is to be assisted, and maintains on its governing board a membership which is at least one-third low-income or representative of low-income neighborhoods.

Lexington recognizes 2 CHDOs:

Fayette County Local Development Corporation (Urban League)

REACH (Resources, Education, and Assistance for Community Housing

EMERGENCY SOLUTIONS GRANTS PROGRAM

On May 20, 2009, President Obama signed the Homeless Emergency and Rapid Transition to Housing (HEARTH) Act of 2009. The HEARTH Act amends and reauthorizes the McKinney-Vento Homeless Assistance Act with substantial changes, including:

- **A consolidation of HUD's competitive grant programs;**
- **A change in HUD's definition of homelessness and chronic homelessness;**
- **A simplified match requirement;**
- **An increase in prevention resources; and,**
- **An increase in the emphasis on performance.**

Under the Homeless Emergency and Rapid Transition to Housing (HEARTH) Act of 2009, the Emergency Shelter Grants Program will be renamed the Emergency Solutions Grants Program. The Interim Rule was published on November 15, 2011.

USES OF ESG FUNDS, as per the Act

Eligible activities include the following

(1) The renovation, major rehabilitation, or conversion of buildings to be used as emergency shelters.

(2) The provision of essential services related to emergency shelter or street outreach, including services concerned with employment, health, education, family support services for homeless youth, substance abuse services, victim services, or mental health services,

(3) Maintenance, operation, insurance, provision of utilities, and provision of furnishings related to emergency shelter.

(4) Provision of rental assistance to provide short-term or medium-term housing to homeless individuals or families or individuals or families at risk of homelessness. Such rental assistance may include tenant-based or project-based rental assistance.

(5) Housing relocation or stabilization services for homeless individuals or families or individuals or families at risk of homelessness, including housing search, mediation or outreach to property owners, legal services, credit repair, providing security or utility deposits, utility payments, rental assistance for a final month at a location, assistance with moving costs.

ESG PROGRAM RESTRICTIONS:

No more than 60% of the funds can be expended for activities 1-3.

Participation in Homeless Management Information System (HMIS)—client level data is required.

50% match is required. May be in-kind match.

PREVIOUS USE OF PROGRAM FUNDS

COMMUNITY DEVELOPMENT BLOCK GRANT PROGRAM
Fiscal Years 2007-2011

ACTIVITY	FY 2011	FY 2010	FY 2009	FY 2008	FY 2007	TOTAL
ADMINISTRATION	213,452	122,784	94,963	128,237	143,054	702,490
PLANNING	0	0	0	0	87,168	87,168
PUBLIC FACILITIES	198,037	53,652	59,345	34,542	20,790	366,366
PARK IMPROVEMENTS		169,624	105,434	8,033	13,724	296,815
PUBLIC IMPROVEMENTS	909,796	825,505	1,440,087	933,141	341,335	4,449,864
HOUSING	622,969	921,092	767,422	941,256	1,021,482	4,274,221
SERVICES	274,813	405,347	272,975	350,622	300,454	1,604,211
	2,219,067	2,498,004	2,740,226	2,395,831	1,928,007	11,781,135

ADMINISTRATION

Human Rights Commission—$125,907
Division of Community Development--$576,583

PLANNING

Rural Settlement Study—$15,416
Russell School Planning Study—$50,000
Winburn Community Center Study—$21,752

PUBLIC FACILITIES

Florence Crittenton Home—Rehabilitation of facility serving low-income pregnant teens--$119,593
Russell Community Services Center—Reconstruction for facility reuse--$191,441
Shepherd's House—rehabilitation of transitional living facility--$20,790
Relocation of Central Kentucky Radio Eye to Northside Library facility--$34,542

PARKS IMPROVEMENTS

Coolavin Park Shelter (New Construction)--$89,374
Carver Center (Elevator Installation)--$147,074
Valley Park (Parking lot and sidewalks)--$60,367

PUBLIC IMPROVEMENTS

Meadows Northland Arlington to include storm water drainage improvements, new sidewalks, and repaving--$4,449,864

Public improvements were completed for portions of Carneal Road, Warfield Place, and Logan Place in April 2008.

Portion of Meadow Lane completed in May 2009

Portion of Meadow Park and a portion of Oakhill was completed in February 2010.

Portion of Shawnee Avenue and portion of Oakhill Drive was completed in December 2010.

Morgan Avenue from Park View Avenue and Oak Hill Drive is in Process.

HOUSING

Realtors Community Housing Foundation--$194,717
Assisted 113 units with emergency repairs, exterior repairs, and ramps for accessibility

Community Action Council Weatherization Enhancement--$80,788
Assisted 29 low-income owner-occupied households with installation of a high efficiency heat source.

Assistance for Lateral Sewers--$41,255
11 low-income owner occupants were assisted with installation of lateral lines for connection to new sewer lines being constructed in previously unsewered areas

Habitat for Humanity--$110,000
Purchased four properties and demolished five structures for redevelopment into single family homeownership units

HOUSING, continued

Housing Rehabilitation Operations--$1,549,580
Salaries and benefits for LFUCG staff who provide direct services in rehab, includes code enforcement officers, and loan and relocation financial personnel, loan servicing, training, equipment, title searches, appraisals, recording fees, and lead-based paint services

Single Family Housing Rehabilitation Program--$2,297,881
145 single family units were completed. This included both emergency repairs (up to $5,000 per unit) and whole house rehab that can include, in addition to all code compliance issues, energy efficiency improvements, accessibility improvements, historic preservation requirements, and lead-based paint interim controls or abatement.

SERVICES

Projects for the Homeless

Volunteers of America Family Housing Program--$279,504
Provided temporary housing and case management to 607 homeless persons (families) so that they could advance to permanent housing

Hope Center Transitional Housing for Persons with Mental Illnesses/Chronically Homeless--$261,200
Provided 91 homeless, seriously mentally ill men a safe, secure, and stable living environment that encourages independence.

Hope Center Recovery Program for Women—$215,500
Provided 929 homeless, substance-abusing women with a long term Recovery Dynamics model and life skills education.

Bluegrass Regional Mental Health Program, Safe Havens for homeless persons with mental illnesses--$128,578
Provided immediate housing and support services to 50 homeless persons with severe mental illnesses for purposes of stabilizing and relocating him/her to permanent housing.

Salvation Army Emergency Shelter for Families and Single Women--$194,800
Provided emergency shelter (including food and support services) to 3,372 persons.

Bluegrass Domestic Violence Program to transition victims of domestic violence into permanent housing--$148,682
Provided 1,320 persons (victims of domestic violence and their families) who are transitioning to permanent housing. Services include housing advocacy, case management, financial education and counseling, employment and education support.

SERVICES

Projects serving Youth

Police Activities League--$93,631
Provided 1,950 low-income children and adolescents with recreational, sports, and educational activities, providing them with an alternative to drug and delinquent activities

Youthbuilders Challenge--$24,004
Provided nine low-income youth who had dropped out of high school with construction training skills. Program included leadership and life skills training.

Repairers of the Breach (East Seventh Street Center)--$102,519
A youth service afterschool program providing tutoring and an educational enrichment program to low-income children. 441 youth were served.

M.A.S.H. Services of the Bluegrass--$105,616
Provided 779 youth who had been homeless, runaways, experiencing family conflict and abuse with supportive services, mentoring, leadership opportunities, and tutoring.

Ruby E. Bailey Family Services Center--$14,000
Operation of a summer camp for low-income children who are at risk of school failure and who lack supervision during the summer months. Services included tutoring and community field trips. 110 children were served.

Manchester Youth Development Program--$20,440
Expansion of program to provide opportunities for additional children to participate in the after school and summer programs offered by Manchester Center
35 children were served.

Imani Focus on Youth Plus Impact Program—$9,643
HIV/AIDS Family Life Education Program that educates minority youth about safer sex.
17 youth completed at least two educational sessions.

OTHER SERVICES

Community Ventures Hispanic Homeownership Counseling--$3,994

Provided homebuyer education services to Hispanic population, including homebuyer orientation sessions, homebuyer education classroom training, financial fitness, pre- and post-purchase counseling, and access to affordable lending products. During the last year of the program, 11 Hispanic households achieved homeownership.

Central Kentucky Radio Eye--$2,100

Provided 49 low-income people who are blind, or otherwise very disabled, with radios for the purpose of receiving broadcasts from Central Kentucky Radio Eye.

HOME INVESTMENT PARTNERSHIPS PROGRAM
Since 1993 Through June 30, 2011

ACTIVITY/PROJECT	HOME AMOUNT EXPENSED THROUGH 6/30/2011	NUMBER OF UNITS PRODUCED
Administration—LFUCG	$2,414,867	
Operating—Fayette County Local Development Corporation	$751,151	
Rental Rehabilitation Projects	$252,492	47
St. James Place/SRO—New Construction	$769,320	100
St. James Place/SRO—New Construction/Expansion	$275,000	38
Virginia Place/One-Parent Family Facility—New Construction	$1,000,000	56

ACTIVITY/PROJECT	HOME AMOUNT EXPENSED THROUGH 6/30/2011	NUMBER OF UNITS PRODUCED
Virginia Place/One-Parent Family Facility—New Construction /Expansion	$250,000	24
Kanisa Apartments—Restoration and New Construction	$400,000	59
Fayette County Local Development Corporation—CHDO activities	$3,687,610	170
R.E.A.C.H.—First-time Homebuyers Program	$7,308,211	484
REACH-CHDO activities	$233,000	3
Community Reinvestment Alliance-First-time Homebuyers Program	$100,277	7
Derbytown Apartments—New Construction	$602,183	64
Chrysalis House Rehabilitation	$200,000	11

ACTIVITY/PROJECT	HOME AMOUNT EXPENSED THROUGH 6/30/2011	NUMBER OF UNITS PRODUCED
Chrysalis Village/Serenity House—New Construction	$352,000	40
Housing for Persons with AIDS	$103,704	1
Community Ventures Corporation—First-time Homebuyers	$3,006,973	158
Canaan House—Acquisition	$64,700	1
Canaan House II—Acquisition/Rehab	$106,910	6
Single Family Housing Rehab	$4,341,339	195
Elm Tree Lane Housing – New Construction	$304,000	19
Shepherd's House – New Construction	$280,000	40
Sugar Mill – New Construction	$186,000	60

ACTIVITY/PROJECT	HOME AMOUNT EXPENSED THROUGH 6/30/2011	NUMBER OF UNITS PRODUCED
Arc of the Bluegrass – Acquisition/Rehabilitation	$127,500	15
Twelfth Street – -Rehabilitation	$481,000	40
Russell School*	0	0
Hope Center for Women – New Construction	$299,100	35
Hope Center/ SRO—New Construction	$500,000	34
New Beginnings-	$200,000	4
Chrysalis Family Program-New Construction	$140,000	1 unit 9 bedrooms
Faith Community Housing Foundation	$579,000	13
Sayre Christian Village	$300,000	42
Falcon Crest	$300,000	72
First Presbyterian Apartments	$250,000	10

ACTIVITY/PROJECT	HOME AMOUNT EXPENSED THROUGH 6/30/2011	NUMBER OF UNITS PRODUCED
Parkside*	0	
Habitat	$1,185,617	155
Tenant Based Rental Assistance		
Community Action Council	$143,329	55
Bluegrass Regional Mental Health/Mental Retardation Board	$170,970	59
AVOL/Housing for Persons with AIDS	$35,923	17
TOTAL UNITS	$31,702,176**	2,144

*Projects are approved, but are still in the construction stage.
**Includes federal funds, grant match, and program income

PICTURES

EMERGENCY SHELTER GRANTS PROGRAM FUNDS
Fiscal Years 2007-2011
EXPENDITURES

PROGRAM	FY 2011	FY 2010	FY 2009	FY 2008	FY 2007	TOTALS
Hope Center Women	$20,000	$20,000	$20,000	$20,000		$80,000
Hope Center for Men	$24,000	$24,400	$24,720	$25,180	$44,720	$143,020
Salvation Army Emergency Shelter	*	$12,688	$12,688	$12,620	$12,620	$50,616
Bluegrass Domestic Violence Program	$10,000	$10,000	$10,000	$10,000	$10,000	$50,000
LFUCG Adult and Tenant Services	$12,585	$24,000	$24,000	$24,511	$29,827	$114,923
TOTALS	$66,585	$91,088	$91,408	$92,311	$97,167	$438,559

*Funds awarded, no expenditures

EMERGENCY SHELTER GRANTS PROGRAM FUNDS
Fiscal Years 2007-2011
ACCOMPLISHMENTS

Hope Center Recovery Program for Women provided long-term recovery dynamics and other life skills training to 770 homeless, substance-abusing women.

Hope Center provided 8,842 persons with emergency shelter and transitional housing.

Salvation Army Emergency Shelter provided 4,461 persons in families and single women with emergency shelter and supportive services.

Bluegrass Domestic Violence Program provided 1,441 victims of domestic violence (women and their children) with emergency shelter.

The LFUCG Division of Adult and Tenant Services provided homelessness prevention (rental and mortgage assistance, utility payments) to 948 persons.

FORMULA FUNDING FROM U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT

	CDBG	HOME	ESG
1975	1,101,000		
1976	1,704,000		
1977	2,851,000		
1978	2,922,000		
1979	3,425,090		
1980	3,338,000		
1981	3,215,000		
1982	2,804,000		
1983	2,799,000		
1984	2,573,000		
1985	2,556,000		
1986	2,171,000		
1987	2,178,000		
1988	2,060,000		

	CDBG	HOME	ESG
1989	2,139,000		34,000
1990	2,063,000		53,000
1991	2,304,000		53,000
1992	2,422,000	1,414,000	53,000
1993	2,778,000	928,000	36,000
1994	3,022,000	1,121,000	81,000
1995	2,870,000	1,210,000	109,000
1996	2,792,000	1,199,000	73,000
1997	2,745,000	1,175,000	73,000
1998	2,654,000	1,257,000	105,000
1999	2,670,000	1,351,000	95,000
2000	2,656,000	1,353,000	95,000
2001	2,748,000	1,503,000	94,000
2002	2,724,000	1,498,000	94,000
2003	2,581,000	1,557,670	93,000
2004	2,505,000	1,778,605	94,412
2005	2,374,796	1,540,589	91,620

	CDBG	HOME	ESG
2006	2,128,374	1,431,886	91,340
2007	2,121,518	1,420,260	91,800
2008	2,045,837	1,371,195	91,408
2009	2,083,092	1,507,826	91,088
2010	2,278,561	1,501,092	91,513
2011	1,904,438	1,321,739	92,314
	92,306,706	**27,439,862**	**1,876,495**

CONTINUUM OF CARE FUNDS
ALSO FROM HUD'S OFFICE OF COMMUNITY PLANNING AND DEVELOPMENT

The purpose of the Continuum of Care (CoC) Homeless Assistance Programs is to reduce the incidence of homelessness in CoC communities, by assisting homeless individuals and families in quickly transitioning to self-sufficiency and permanent housing, as authorized under Title IV of the McKinney-Vento Homeless Assistance Act. The CoC Homeless Assistance Programs include the Supportive Housing Program (SHP), the Shelter Plus Care (S+C) Program.

Lexington-Fayette County is a Continuum of Care community. The Continuum of Care plan is developed by the Central Kentucky Homeless and Housing Initiative (CKHHI). This collaborative determines the use of these funds.

The most recent five years of funding:

PROJECT NAME	2006	2007	2008	2009	2010	TOTALS
Chrysalis Family Program	$219,154	$219,154	$219,154	$219,154	$219,154	**$1,095,770**
Chrysalis Permanent Housing Bonus				$105,863		**$105,863**
Chrysalis House Scattered Site Apts.	$83,334	$83,334	$85,595	$85,595	$85,595	**$423,453**
Hope Center Transitional Housing	$269,334	$269,334	$269,334	$269,334	$269,334	**$1,346,670**
Hope Center--Shepherd's Place Apartments	$166,667	$166,667	$166,667	$166,667	166,667	**$833,335**
Volunteers of American--Lexington Supportive Permanent Housing	$240,853	$240,853	$246,682	$246,682	$246,682	**$1,221,752**

PROJECT NAME	2006	2007	2008	2009	2010	TOTALS
Kentucky Housing Corporation--Lexington/Fayette Samaritan Project		$105,840		$52,920	52,920	**$211,680**
New Beginnings Permanent Housing Project	$53,492	$53,492	$53,492	$53,492	$53,492	**$267,460**
BG Regional MH-MR Board--Permanent Supportive Housing for Disabled Persons in Fayette County	$165,213	$165,210	$167,268	$167,268	$167,268	**$832,227**
Project Independence	$64,409	$64,409	$65,129	$65,129	$65,129	**$324,205**
Lexington Housing Authority Shelter Plus Care	$191,928	$202,536	$201,432	$216,072	209,496	**$1,021,464**
TOTALS	**$1,454,384**	**$1,570,829**	**$1,474,753**	**$1,648,176**	**$1,535,737**	**$7,683,879.00**

HOUSING OPPORTUNITIES FOR PERSONS WITH AIDS (HOPWA)

To address housing needs for low-income persons who are living with HIV/AIDS and their families, HUD manages the Housing Opportunities for Persons with AIDS program. The HOPWA program is the only Federal program dedicated to address the housing needs of persons living with HIV/AIDS and their families.

While Lexington is a not a formula grantee under this program Lexington-Fayette Urban County Government has been a grantee (competitive) under this program since 1994. With these funds, two facilities with supportive services are operated by AIDS Volunteers, Inc.

1994	1998	2001	2005	2008	2011
$1,000,000	$1,144,000	$1,362,860	$1,426,690	$1,430,000	$1,430,000

TOTAL: $7,793,550

CONGRESSIONAL APPROPRIATIONS
112TH CONGRESS

U.S. Department of Housing and Urban Development
Selected Program Budgets

Program	FY 2010 Enacted Level	FY 2011 Enacted Level	FY 2012 President's Request	FY 2012 House Appropriations Committee	FY 2012 Senate Appropriations Committee
CDBG Fund Formula Grants	$3.990 billion	$3.335 billion	$3.684 billion	$3.46 billion	$2.851 billion
		16% decrease		4% increase	15% decrease

Program	FY 2010 Enacted Level	FY 2011 Enacted Level	FY 2012 President's Request	FY 2012 House Appropriations Committee	FY 2012 Senate Appropriations Committee
HOME Program	$1.825 billion	$1.606 billion	$1.650 billion	$1.2 billion	$1 billion
		12% decrease		26% decrease	38% decrease
Homeless Programs	$1.865 billion	$1.9 billion	$2.372 billion	$1.9 billion	$1.9 billion
		2% increase		No change	No change

THE 2012 CONSOLDIATED PLAN PROCESS
Based upon approved Citizen Participation Plan

CALENDAR

September 5, 2011
Announcement that 2012 Consolidated Plan process has begun
Legal Ad in the Newspaper.
Letters were mailed to agencies, churches in low-income neighborhoods, and neighborhood associations in low-income neighborhoods.

First Public Hearing **September 19, 2011, 6:00 P.M**

Letters were mailed to agencies, churches in low-income neighborhoods, and neighborhood associations in low-income neighborhoods.
Deadline for applications **November 18, 2011, 5:00 P.M.**

Staff review of applications
Completed by **January 10, 2012**

Legal Ad in the Newspaper.
Letters mailed to agencies, churches in low-income neighborhoods, and neighborhood associations in low-income neighborhoods
Publication of draft 2012 Consolidated Plan March 1, 2012
One-Year Action Plan

Legal Ad in the Newspaper.
Letters mailed to agencies, churches in low-income neighborhoods, and neighborhood associations in low-income neighborhoods
Second Public Hearing March 5, 2012, 6:00 P.M.

Deadline for citizen comments April 2, 2012

Council meetings to review 2012 Consolidated Plan **April 2012,**
dates to be announced

Submission of Final 2012 Consolidated Plan **May 14, 2012**
to the U.S. Department of Housing and Urban Development
Submission of Consolidated Plan is due at least 45 days before the Program year begins on July 1, 2012

CDBG APPLICATION

APPLICATION DIRECTIONS

The attached application is required if your organization is requesting funding from the Community Development Block Grant Program for the period July 1, 2012 through June 30, 2013. **The application due date is Friday, November 18, 2011, 5:00 p.m., in the office of the Division of Grants and Special Programs on the 6th floor of the Government Center at 200 East Main Street. Only one copy is required. This copy should be on 8 ½ x 11" white paper and clipped in the upper left hand corner.**

Applications will be reviewed by the staff of the Division of Community Development, Lexington-Fayette Urban County Government, and by other LFUCG staff as necessary. Staff may have additional questions and may want to interview a representative of your organization before making a recommendation on your application. LFUCG staff will make recommendations on funding for inclusion in the 2012 Consolidated Plan. Please check the LFUCG website (www.LexingtonKY.gov/CommunityDevelopment) for notices of the publication of the draft 2012 Consolidated Plan, the second public hearing, and Urban County Council meetings during which the 2012 Consolidated Plan is scheduled for discussion and/or action. Final funding decisions rest with the Urban County Council. Applicants are also advised that funds cannot be committed until after the federal government approves the Lexington-Fayette Urban County Government (LFUCG)'s Consolidated Plan and that individual applicant agencies may not commit funds until specifically authorized by the LFUCG. **Applicants may request a funding period that begins October 1, 2012 and extends through September 30, 2013.**

Funding from the Community Development Block Grant Program is very limited. Total CDBG funding for Consolidated Plan Year 2011 was $2,104,438. During the past year, congressional budget cuts resulted in a 16% cut to LFUCG's federal award. The Lexington-Fayette Urban County Government uses funds from this grant to support administrative costs, to support a housing rehabilitation program for low-income homeowners, and to fund public improvement projects in low-income neighborhoods. It is estimated that a minimum of $1,900,000 will be committed to these ongoing activities. In addition, the federal government, by statute, limits the amount of funds that may be spent for services. The maximum amount a local government may spend on services is 15% of the total federal award plus 15% of the program income received by the local government during the previous program year. Due to the decrease in federal funding, the LFUCG may limit funding for services projects below the 15% level.

You may direct questions about the application to Irene Gooding, Acting Director, at (859) 258-3070 or ireneg@lexingtonky.gov.

The following is the basis that will be used for the 2012 Plan Year for recommending applications for funding under the Community Development Block Grant Program.

<u>Applicant capacity</u>. . The application must demonstrate that the agency staff has adequate credentials and experience to carry out the proposed project. This means that the organization carrying out the project, its employees, or its partners, must have the necessary experience and qualifications to carry out the specific activities proposed. Factors to be considered will include: prior agency experience and results in the type of work being proposed; suitable agency fiscal capacity and organizational infrastructure to implement the project; and employee experience and credentials in the area to be implemented. The LFUCG's monitoring records of previously funded projects will also be considered in determining applicant capacity.

Project quality. The services proposed must be appropriate to the needs of the persons to be served. The application must demonstrate a clear understanding of the needs of the clients, the services to be offered, and the effectiveness of the services in meeting those client needs. A project may be considered to be of good quality if:

1. The type and scale of the housing and/or services proposed clearly fit the needs of the proposed participants.
2. The project is cost-effective and all costs are reasonable, and do not deviate substantially from the norm in Lexington;
3. The application shows evidence of collaboration with other existing programs and services; letters evidencing collaboration may be attached.
4. The building proposed for use meets local codes, health, or safety standards;

Need for Project. It must describe the need for the specific project vis-à-vis existing services. The project may be judged to adequately describe the need if it addresses the following points:

1. The need for the project is documented by use of waiting lists, references to similar programs, etc.
2. The project is consistent with the priorities described in the five-year Strategic Plan in the LFUCG'S 2010 Consolidated Plan;
3. The project does not unnecessarily duplicate existing programs and services for the same clients.

<u>Operational Feasibility.</u> The application must include:

1. Clear and complete plans for implementing and completing the project;
2. Adequate <u>committed</u> funding to implement the project. Include letters of commitment.
3. An adequate strategy for securing additional support and commitment;
4. Adequate number of qualified staff to carry out the proposed project;
5. Indicators (site control, zoning) that demonstrate that the project is ready to be implemented;

The LFUCG reserves the right to adjust funding amounts. The Mayor and Council have final review and approval of projects.

Application requests the following information:

Name of Agency Requesting Funding

CDBG Request (amount of $)

Project Title

Project Address

IF THE REQUESTED PROJECT IS A SERVICE (including but not limited to employment, crime prevention, child care, health, drug abuse, education, fair housing counseling, energy conservation, welfare, homebuyer downpayment assistance, or recreational needs), IT MUST BE EITHER A NEW SERVICE OR A QUANTIFIABLE INCREASE IN THE LEVEL OF AN EXISTING SERVICE ABOVE THAT WHICH IS ALREADY BEING PROVIDED. Please indicate if it is a new service, or if it is an increase in an existing service, describe how it qualifies as an increase in 200 words or less. NOTE: If your service project was funded by CDBG funds last year, and you are requesting continuation funding you do not need to prove that it is a new service or that it is an increase in an existing service. If you are requesting an increase in funding, however, you must justify the increase in funds with an increase in services

Describe the agency's mission.

Organizational Chart and Board of Directors Please include a copy of the organization's most recent audit report, articles of incorporation, bylaws, and your agency's IRS letter signifying your nonprofit status.

Mailing Address (include city and zip)

Project Contact Person, Phone No., Fax, and email address

Year Incorporated

501c(3)?

Taxpayer Identification No.

DUNS Number

Major Sources of Agency Funding (please list)

Agency's Authorized Signee (please print)

MEETING A CDBG NATIONAL OBJECTIVE (Mandatory)

All proposals must address the national objective of benefiting low/moderate income persons. Please check the appropriate box that applies to your project.

Please describe how your project benefits low and moderate income persons. If your project is client-based or special needs, describe how you will identify/admit clients and how you will document their eligibility.

PROJECT OVERVIEW

Briefly, in 200 words or less, describe the proposed project:

PROJECT SERVICE DESCRIPTION

Describe the project services that will be offered if this application is funded.

NEED AND RELATIONSHIP TO STRATEGIC PLAN

Describe the need for this project and describe how this project addresses a priority need in the 2010 Strategic Plan:

Define the project in measurable outcomes and performance objectives. This should not be a description of services provided, but rather, the beneficial effect on those being served.

EXAMPLE: A job training program.

The project outcomes/performance objectives are NOT the number of persons being trained for a given number of hours, or the number of classes conducted, but should be the number of people who complete training and obtain full-time jobs that pay a living wage.

Goals and measurable objectives should be established.

EXAMPLE: 80% of the participants will complete training program and obtain jobs

History with federally funded projects
List the two (2) most recent federally funded projects sponsored by your agency that are similar to the project for which you are requesting funding. Please attach an additional page if necessary to explain your previous performance

Please describe the organization's experience (and the program staff qualifications) in designing and successfully implementing the project proposed in this application. Describe any state licensure requirements, facility locations, building permits, zoning, etc. Provide timeline with start date and end date. State barriers to be overcome in the implementation of the project.

Describe budgetary plans for future needs (three years). Describe your operating plan if CDBG funds are not available. Please list your efforts to secure other funds. List the resources you have requested and the status of these requests. If this project is approved for funding only one year of funding can be guaranteed

Describe your agency's relationship and collaborative partnerships with other community partners. You may attach letters

SCHEDULE A. – PROJECT BUDGET

SCHEDULE B. – BUDGET NARRATIVE

SCHEDULE C. – SOURCES OF OTHER PROJECT FUNDS

SCHEDULE D. – APPLICATION CHECKLIST

AFTER HUD APPROVES THE CONSOLIDATED PLAN

LFUCG executes subrecipient agreements with nonprofits that have been approved for funding.

Subrecipients are required to submit progress reports on a quarterly and annual basis on:

- **Number of people served, race/ethnicity, gender, age, disability. Annual unduplicated numbers of people served are required.**

- **Progress toward meeting performance objective.**

Annual Reports also require race/ethnicity of the subrecipient's workforce.

Lexington-Fayette Urban County Government has responsibility for reporting to the U.S. Department of Housing and Urban Development in two formats:

IDIS—Integrated Disbursements and Information System. This is HUD's on-line system by which information is reported and funds are drawn.

CAPER—Consolidated Annual Performance and Evaluation Report which is completed and submitted to HUD no later than September 30th. This report is submitted on the Consolidated Program Management Process tool. The Citizen Participation Plan also requires that we provide notice to citizens of its availability for review and comment. This includes:

- **Legal Ad in the Newspaper.**
- **Letters are mailed to agencies, churches in low-income neighborhoods, council members, and neighborhood associations in low-income neighborhoods**

MONITORING

Division of Grants and Special Programs staff has responsibility for monitoring CDBG/ESG subrecipients for compliance.

Is the sugrantee/subrecipient operating the program for which it was funded?

Timeliness of project
Does the project generate program income and is program income properly documented and reported to the LFUCG?
If the program has beneficiaries, are individual client files maintained, is income verified, how many clients have been served?
Internal controls will be monitored for the following: accounting system, procurement process, inventory controls, check approval process, check signature process, payroll process, timesheets, tax returns, workman's compensation, equal employment opportunity, open positions advertised, fair housing posters displayed, minority business outreach.

Annual audits will be monitored for findings and concerns

For HOME projects, also monitor for compliance with the period of affordability which can be up to 20 years. This monitoring includes compliance with rents as published by HUD, tenant incomes, leases, and property condition.

CROSS-CUTTING REGULATIONS:

National Environmental Policy Act—LFUCG As A HUD Grantee has responsibility for clearing all projects under NEPA

Required To Affirmatively Further Fair Housing Fair Housing Act (Public Law 90-284)

Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970

Section 109 of the Housing and Community Development Act of 1974, as amended, requiring that no person in the United States shall on the ground of race, national origin, or sex, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under, any program or activity funded in whole in part with community development funds. Section 109 further prohibits discrimination on the basis of age or disability.

Title VI of the Civil Rights Act of 1964 (Public Law 88-352)

Federal prevailing wage law and the Contract Work Hours and Safety Standards Act

National Flood Insurance Program

Lead-based Paint Poisoning Prevention Act and Residential Lead-Based Paint Hazard Reduction Act of 1992

Uniform administrative requirements and cost principles

Lexington-Fayette Urban County Council

TO: George Myers, Councilmember

From: Paul Schoninger
Research Analyst

DATE: November 1, 2011

SUBJECT: Consolidated Plan Process

This memo is in response to your recent request for information regarding the Community Development Consolidated Plan process. You requested that I review the Consolidated Plan process utilized by Lexington Fayette County as well as review other communities to determine if the process we utilize was appropriate and if we could develop a best practice model.

The US Department of Housing & Urban Development (HUD) requires that all jurisdictions entitled to receive funding under the several HUD programs develop a consolidated plan for community development no less than every five years and an action plan every year. This federally required planning document helps guide the jurisdictions and describes community development efforts in their respective communities and serves as the application request for funding for federal housing and community development programs.

The Plan, while having many required components, has an overall 3 pronged structure: 1) an analysis of housing and community development needs; 2) a statement of strategies to address identified needs; and 3) a detailed listing of activities that implement proposed strategies. The needs and assessments & strategies, while they can be amended, remain constant for the Plan's Five-year period, while the implementing activities are updated annually. It is the annual listing that most visibly serves as the application for federal formula grant programs.

According to the federal regulations, the information in the consolidated Plan can be displayed in any clear concise format at each jurisdiction's discretion. The plan must include an executive summary that communicates the key elements of the plan to its citizens. The executive summary must include the plan's objectives and outcomes identified in the plan as well as an evaluation of past performance.

Federal regulations require that the Lexington Fayette Urban County Government prepare a consolidated document in which it states how it will pursue goals for its community planning & development programs, including housing programs. The overall goal is to develop viable urban communities by providing decent housing, a suitable living environment, and expanded economic opportunities principally for low and moderate income persons.

The three (3) programs that Lexington uses are the Community Development Block Grant program (CDBG), Emergency Shelter Grant (ESG), and the Home Investment Partnership program (HOME). Lexington has approximately $ 4 million annually in the three programs, which includes $ 3.3 million in federal funds, $ 300,000 in cash match and another $ 400,000 in program income.

By and large the Lexington Consolidated Plan adheres to the required federal regulations (see attached memo dated 8.3.11 from HUD to Mayor Gray re approval of 2011 Annual Action Plan). Collaboration in developing the Plan, and linking the Plan with outcomes/measures of performance could all be improved. Several years ago Lexington did utilize the Housing & Support Services Commission to develop the Plan. However there was concern that the entities developing the plan were the same entities that competed for funds and implemented the program. So that effort was abandoned. Further HUD does not provide any financial incentives for improving the planning process. CDBG, ESG and HOME are all formula based awards.

As part of this analysis I reviewed several consolidated plans including Fairfax County, VA; Asheville, NC; Charlotte/Muhlenberg Co, NC: St. Paul, MN; Austin, TX; and Tucson, AZ.

I have attached several pages from the Asheville, NC Consolidated Plan regarding performance measurement. In addition I have attached a section from the St. Paul Plan regarding 3 and 5 year assessments. Both of these are examples of communities using qualitative tools to measure performance and the effectiveness of their respective community development projects. Either effort may prove to be useful to Lexington-Fayette in improving the use of performance measurement to better utilize federal & state funds to support housing initiatives in the County.

Utilizing a 'best practice' model may be somewhat of a misnomer. The Plans developed are unique to their respective communities, based on a unique set of housing and development deficiencies found in each community. Therefore a best practice identified in one community may not be appropriate in another community with a different set of housing & development parameters.

Should you need any further information please do not hesitate to contact me at 258-3208.

Paul Schoninger
Research Analyst

c: Elizabeth Chatterton

U. S. Department of Housing and Urban Development
Louisville Field Office, Region IV
601 West Broadway, Room 110
Louisville, Kentucky 40202

AUG 0 3 2011

The Honorable Jim Gray
Mayor, Lexington-Fayette Urban County Government
200 E. Main Street
Lexington, KY 40507

Subject: 2011 Annual Action Plan Approval
Grant Nos. B-11-MC-21-0004
M-11-MC-21-0201
E-11-MC-21-0003

Dear Mayor Gray:

On behalf of the U. S. Department of Housing and Urban Development (HUD), we are pleased to transmit the approval of Lexington-Fayette Urban County Government's (LFUCG) 2011 Annual Action Plan (Plan). The 2011 program year began July 1, 2011. The grant assistance being approved with the Plan is as follows:

Community Development Block Grant (CDBG) Program	$ 1,904,438
HOME Investment Partnerships (HOME) Program	$ 1,321,739
Emergency Shelter Grant (ESG) Program	$ 92,314

We have enclosed the Funding Approval/Agreements for the CDBG program (Form HUD-7082), HOME (HUD 40093), and ESG. These Funding Approval/Agreements constitute the contracts between HUD and LFUCG. You should note any special conditions included in the Funding Approval (Item 8 for CDBG). Please sign and date all three copies of the Agreements. Retain one copy for your records and return the other two copies to the HUD Louisville Office of Community Planning and Development.

Failure to execute and return the grant agreements within 60 days of the date of this letter may be considered rejection of the grant and cause for HUD to determine that the funds are available for reallocation to other grantees. In addition to the grant agreements, we have enclosed guidance for program administration and recommendations for future Plan submissions for your review. Please note that the ESG will follow the existing program requirements at 24 Code of Federal Regulations (CFR) 576. HUD will issue funding and guidance for the Emergency Solutions Grant to implement the HEARTH Act at a later time.

Please note that there are new reporting requirements for these grants, specifically the requirements established by the Office of Management and Budget (OMB) concerning the Dun and Bradstreet Data Universal Numbering System (DUNS), the Central Contractor Registration (CCR) database, and the Federal Funding Accountability and Transparency Act including Appendix A to Part 25 of the Financial Assistance Use of Universal Identifier and Central Contractor Registration, 75 Fed. Reg. 55671 (Sept. 14, 2010) (to be codified at 2 CFR Part 25), and Appendix A to part 170 of the Requirements for Federal Funding Accountability and Transparency Act Implementation, 75 Fed. Reg. 55663 (Sept. 14, 2010) (to be codified at 2 CFR Part 170). Please ensure that the staff responsible for financial compliance and reporting are aware of these requirements.

We commend you and the LFUCG's staff on the completion of the 2011 Plan. LFUCG's efforts to address the problems of affordable housing, homelessness, and economic opportunities for all citizens, particularly those of low- to moderate-income, elderly and families with children are notable. The growth of Lexington-Fayette County continues through community partnerships and involvement in accomplishing the goals and objectives proposed.

If you have questions or desire assistance related to the community development programs, please contact Mr. Roger Leonard, Director, Office of Community Planning and Development, at 502-618-8143 or by email at Roger.A.Leonard@hud.gov.

Sincerely,

Krista Mills

Krista Mills
Field Office Director

Enclosures

cc:
Richard Moloney, Chief Administrative Officer
Irene Gooding, Acting Director, LFUCG Division of Community Development
Cheryl Talbert, Director, Adult and Tenant Services

Action Plan Guidance
Program Year 2011
Lexington-Fayette Urban County Government

This guidance will assist in the management of this year's Action Plan (Plan) and the preparation of the 2010 Consolidated Annual Performance and Evaluation Report (CAPER).

Our office received LFUCG's 2011 Plan on May 13, 2011. The 2011 Plan is the second year of the 2010-2014 Consolidated Plan cycle and includes by reference many of the same supporting tables and information. It meets the requirements of 24 Code of Federal Regulations (CFR) Part 91 to include the Final Rule, Consolidated Plan Revisions and Updates, published in the Federal Register February 9, 2006. The Plan was consistent with the priorities and proposed activities in LFUCG's 2010-2014 Consolidated Plan. It is clear that LFUCG staff are making a sincere effort to follow the requirements and produce a useful planning document for Lexington-Fayette County citizens.

LFUCG will utilize CDBG funds for public facilities, public services, fair housing enforcement, emergency repairs to low- and moderate-income homeowners, rehabilitation for low-income homeowners, 154-bed dormitory for homeless men construction gap financing, apartment complex rehabilitation for very low-income persons with intellectual/developmental disabilities and severe mental illnesses, rehabilitation program administration and administration. HOME funds are allocated for the rehabilitation of low-income owner-occupied homes, construction of 22 new single-family homes, direct homeownership assistance to 18 first-time homebuyers, apartment complex rehabilitation, rental housing, tenant based rental assistance, CHDO set-aside and operating expenses, and administration. Homeless prevention activities and support to shelter operations will be funded by ESG funds. LFUCG submitted changes in the distribution of CPD funds after submission of the Plan; however, changes were made prior to HUD approval of the Plan.

Designation of Lead Agency

The Plan noted that the Division of Community Development is the lead agency for overseeing the preparation, administration, reporting, and monitoring of Plan activities. Other departments involved in implementing various projects included the Division of Engineering, Fayette County Health Department, and Division of Adult Services.

The purpose of the lead agency designation, in addition to preparation and submission of plans and reports, is to be a central point of contact for management of CPD programs. The Community Development staff are in regular communication with HUD and routinely participate in HUD training events and other activities. During the past several months, the Community Development staff have substantially improved their knowledge of CPD programs and have worked diligently to clean up data in HUD's Integrated Disbursement and Information System (IDIS), improve program implementation, and to generally ensure that CPD programs implemented by LFUCG meet all of the appropriate programmatic and performance measurement requirements. Their professionalism and performance have been noted.

During the coming year it is anticipated that staff members of the Division of Community Development will participate in additional training activities for the purpose of improving their skills in HOME and CDBG grants management, lead-based paint assessments, energy efficiency, property acquisition and relocation, environmental review, and labor compliance.

In January of 2011, a new Mayor of the Lexington-Fayette Urban County Government was sworn into office. The new administration is in the process of reviewing the efficiency and effectiveness of all government operations. The Division of Community Development has been transferred from the Department of Finance and Administration to the supervision of the Chief Administrative Officer.

During our review of the Plan, we noted that Community Development staff used the recommended Consolidated Plan Management Program (CPMP) Tool including the supporting needs assessment worksheets for housing, community development, non-homeless special needs, and homeless needs. Our assessment of the Plan indicates it continues to be complete and responsive picture showing the needs of the community served. The narrative responses were appropriate to the topic and provided useful information to the readers. These documents reflect many hours of effort meeting with community partners, soliciting needs, evaluating comments, and reviewing proposals. The high quality of the finished product is a testament to the dedication and professionalism of the Community Development staff assigned to this project. They clearly understand the purpose of the planning documents and have endeavored to provide a meaningful tool for the CPD-assisted programs. We congratulate your staff on a job "Well Done."

American Recovery and Reinvestment Act

The 2009 American Recovery and Reinvestment Act signed into law by President Obama on February 17, 2009, awarded LFUCG $555,600 in CDBG-R funds. These funds were an amendment to LFUCG's 2008 Action Plan and will be used in program year 2011 to make energy efficiency improvements in its single family housing rehabilitation program. As a sub-recipient, Community Action Council will also use CDBG-R funds to improve energy efficiency in single family residential units, in conjunction with the U.S. Department of Energy's Weatherization Assistance Program.

LFUCG also received $849,688 in Homelessness Prevention and Rapid Re-housing Program (HPRP) funds. The LFUCG Division of Adult Services uses these funds over a three-year period to re-house homeless persons and to provide financial assistance for rent and utilities to prevent homelessness for those at risk. HPRP funds are also being used to provide case management to of stabilize households re-housed under this program.

HOME Investment Partnerships (HOME) Program

There has been renewed focus on the HOME program this year due to various media stories regarding stalled or slow projects. Fortunately, only one such activity was identified for the Commonwealth and your staff promptly provided the information we requested to resolve the question. The Commonwealth has 24 months from the date of the grant agreement to commitment 2011 HOME funds. The commitment requirement is identified at 24 CFR 92.2. HOME activities are expected to be underway (funds drawn) within 12 months of commitment and the project completed (final draw and occupancy) within an additional 12 months. An additional 120 days is allowed for completion data to be entered into IDIS. The period of affordability does not begin until the completion data is entered. HUD has instituted new IDIS and the project completed (final draw and occupancy) within an additional 12 months. An additional 120 days is allowed for completion data to be entered into IDIS. The period of affordability does not begin until the completion data is entered. HUD has instituted new IDIS screening requirements that will automatically deobligate funds and cancel activities that fail to meet the initial requirement of funds drawn within 12 months of activity set-up. Every HOME-assisted activity that does not meet the above performance standards is considered a slow moving or stalled activity and is subject to further review by HUD. Failure to manage projects to a timely completion within the program requirements may result in a HUD determination that LFUCG has failed to properly administer a HOME-funded activity and request repayment of the funds. It is highly recommended that LFUCG Community Development staff review the monthly updates on the HOME Reports website to ensure projects are properly reported in IDIS and data is accurate and up-to-date. Further, HUD expects that any stalled or slow-moving activity be identified and reported in the CAPER detailing the status of the activity.

The Plan noted the HOME rental unit inspection requirement, but not the actual projects that should be scheduled for review during the program year. As a reminder, HOME rental inspections are a mandatory requirement of the HOME program separate from the risk-based monitoring activities. A summary report of the inspections completed and associated corrective actions should be included in the CAPER.

Emergency Shelter/Emergency Solutions Grants-FY2011

Two-stage allocation - The FY 2011 appropriation report language directed HUD to implement the new *Emergency Solutions Grant (ESG)* program at a level of *at least $225 million*. This is an increase of at least $65 million over the FY 2010 allocation amount of $160 million. Congress clearly added new funding for the Emergency Solutions Grant Program with the expectation that the additional money over previous allocations should be spent under the HEARTH Act Amendments. The Emergency Solutions Grant Program (including amendments to the consolidated plan regulation) and Homeless Definition regulations have been prioritized and are continuing to move through the clearance process. The new ESG/Consolidated Plan regulations are now at OMB.

In developing their 2011 Plan for ESG, HUD has advised ESG grantees to assume funding based upon their 2010 allocation and to follow the existing ESG regulations. Nearly all ESG grantees developed their 2011 programs (and in some cases have submitted an application to their Field Office) under this direction. HUD has implemented a two-stage ESG allocation process for FY 2011 in order to address pressing local needs for immediate funding and to meet Congressional direction on funding Emergency Solutions Grant activities. HUD released an initial $160 million earlier this month under the current regulations so that grantees can proceed with plans to fund existing emergency shelter and homeless prevention activities. After the new ESG regulations are published for effect, HUD will release the additional allocation of $90 million (for a total of $250 million in FY2011). With the release of the second FY 2011 ESG allocation, grantees will be required to complete a substantial amendment to their Consolidated Plan/Action Plan, as necessary, at that time.

<u>ESG Agreement</u> - The revised *ESG Agreement* for the FY 2011 Emergency Shelter/ Emergency Solutions Grant is attached. The grant number now begins with an "E" instead of an "S" to differentiate it from the ESG allocations before FY 2011.

<u>New ESG Program Path for IDIS</u> - ESG grantees will be able to draw on their FY 2011 ESG grant allocation of $160 million in late July, when the next release of IDIS is currently scheduled. Grantees will use a new program path, called "HESG" (HEARTH-ESG) to set up their projects and activities, commit funds, and draw funds. The information required for setting up activities in the new program path will be very minimal. Grantees will currently use IDIS in the same manner they do HPRP — to draw funds, but not to report. We are currently preparing guidance to be posted in late July on the Homelessness Resource Exchange (HRE) at <u>www.hudhre.com</u>. An additional release of IDIS and updated instructions are planned for the second FY 2011 ESG allocation, when additional screens will be made available. Reporting accomplishments will also be addressed for the new program at a future date.

<u>Important Clarification Regarding the Use of Instrumentalities</u> - A number of state and local government ESG recipients have used instrumentalities to administer the ESG program, including state/local housing finance agencies and state/local public housing authorities. The following guidance clarifies how such instrumentalities can continue to be used in the administration of ESG funds.

HUD cannot make an ESG to an instrumentality. Under the McKinney-Vento Act, HUD may only make ESG funds to states and units of general purpose local government. The state or unit of general purpose local government must receive the grant and is responsible for the administration of the ESG program.

1) Instrumentalities cannot be subgrantees under ESG. The McKinney-Vento Act only permits a state to subgrant its ESG funds to units of general purpose local government and private nonprofit organizations in the state. And units of general purpose local government, whether grantees or subgrantees under ESG, are only permitted to subgrant their funds to private nonprofit organizations.

2) To the extent permitted by state procurement rules, a state may contract with any entity, including an instrumentality of the state, to carry out specific functions in support of the state's administration of the ESG program. However, the use of an instrumentality or other contractor does not relieve the state of its responsibility for ensuring that ESG funds are used in accordance with all program requirements and for taking appropriate actions when performance problems arise.

3) A unit of general purpose local government may contract with any entity, including an instrumentality, to carry out specific functions in support of the local government's administration of the ESG program, provided that the local government follows the procurement requirements at 24 CFR 85.36. However, the use of an instrumentality or other contractor does not relieve the local government of its responsibility for ensuring that ESG funds are used in accordance with all program requirements and for taking appropriate actions when performance problems arise.

4) Even if a state or local government contracts with an instrumentality to carry out certain administrative functions, the instrumentality cannot receive the grant on behalf of the state or local government. Only an authorized official of the state or local government grantee can sign the grant agreement with HUD, and only an authorized official of the state or local government can draw down the grantee's funds.

Virtual Help Desk - Since the new requirements for the Emergency Solutions Grant program will not be finalized until the ESG Rule is published, grantees and field office staff should submit all questions regarding the new program (except for IDIS questions) to the HRE Virtual Help Desk (www.hudhre.info). This process, which is very similar to the process used for HPRP, enables headquarters to review and vet answers, compile Frequently Asked Questions and identify topic areas for technical assistance products. The HRE Virtual Help Desk will be modified to include Emergency Solutions Grant program topics and subtopics by the end of June. For IDIS questions, grantee and field office staff should continue to use the IDIS Technical Assistance Unit (TAU) helpdesk at 877-483-8282 or email idis.help@hud.gov.

Emergency Shelter Grants Allocations-FY2010 and Earlier

Grantees should continue to use the "ESG" path in IDIS for projects and activities funded from ESG allocations for FY2010 and earlier. These grants have an "S" grant number. If you have questions regarding the Emergency Shelter Grant Program, please your CPD representative.

Fair Housing and Equal Opportunity Certification and Requirements

"Promoting fair housing" is a strategic goal of the Department's Management Plan. The objectives are to ensure that housing discrimination is reduced, low-income people are not isolated geographically, and disparities in homeownership rates among racial and ethnic groups are reduced. As a Consolidated Plan grantee, you have certified that your jurisdiction will "Affirmatively Further Fair Housing" and enforce "Compliance with Anti-discrimination laws." We encourage you to continue to work with HUD as we promote fair housing and end discrimination.

The Louisville HUD Fair Housing and Equal Opportunity (FHEO) Center, upon review of the 2011 Plan, stated, "The grantee's Analysis of Impediment (A/I) is pending approval based upon the recommended changes from the Louisville FHEO Center. However, the grantee has continued to Affirmatively Further Fair Housing as required and the grantee's 2011 Action Plan is approved".

LFUCG completed its AI in September 2009. A copy was submitted for FHEO's review. On May 4, 2010, LFUCG inquired about the review. LFUCG and the Louisville Office of Community Planning and Development (CPD) were informed the review would be completed by May 7, 2010. On June 1, 2010, CPD inquired about the status of the review due to LFUCG not receiving information on the results of the review. On May 4, 2011, LFUCG received a letter dated May 2, 2011, that stated FHEO recommended the AI be revised/updated based upon its review. A response letter dated May 31, 2011, was addressed to FHEO. The letter stated that based upon budget cuts at both the state and federal levels, the position of LFUCG is that it is important to strategically utilize its grant dollars to ensure effective enforcement of fair housing policies and cure identified impediments to fair housing and requested FHEO reconsider its request for an immediate revision to LFUCG's AI.

Lead-Based Paint Compliance Requirements

One of HUD's key goals is to reduce the exposure of citizens, especially young children and women of child-bearing age, to the affects of lead-based paint (LBP). HUD's LBP regulations at 24 CFR 135 require that recipients comply with specific rules and procedures depending on the type of activity undertaken and, in some cases, the amount of funds expended. LFUCG should review each project involving rehabilitation, homebuyer assistance and rental assistance carefully to ensure that the project is in compliance with the LBP requirements.

Consultation and Citizen Participation

LFUCG conducted two public hearings. The required public hearing was held October 18, 2010, to receive proposals on the expenditure of CDBG, HOME, and ESG funds for the 2011 Plan, and in addition, provided application forms and information on regulations and eligible activities. Comments received during the public hearing and written comments were included in the 2011 Plan. Notices for the hearings and the advertisement for review of the 2011 Plan were published in the Lexington Herald-Leader newspaper. In addition, LFUCG sent review notification on the availability of the draft plan to neighborhood associations an churches in low-income neighborhoods, urban county council members and their staff, and to organizations and individuals that indicated an interest in the housing and community development needs of the low-income, homeless, and special needs population in an effort to spur additional comments. Persons or organizations that wanted to view the documents and/or provide comments could view the documents at the library and request copies through LFUCG. The government's cable channel advertised the public hearings. The 2011 Plan was drafted based on citizen comments and the priority needs that were established through the Consolidated Planning process. The First-time Homebuyers Guidelines were revised a result of the written comments received to allow households receiving first-time homeownership HOME funds to have cash reserves of up to six months of gross monthly income. The previous reserve amount only allowed three months of reserves without pre-approval from the Division of Community Development. We suggest radio stations be notified at least one week prior to the public hearing date for additional advertising outlets. We suggest additional outreach be considered through the internet, Lexington Housing Authority (resident newsletters), flyers at churches, grocery stores, laundromats and restaurants in an effort to promote full citizen participation. In regard to this additional outreach, we suggest LFUCG post notice of the public hearings and provide access to the draft Plan on its internet web home page to receive additional citizens' comments.

Timeliness

Timeliness remains a concern for the expenditure of CDBG funds. Timely funds expenditure remains a high Departmental priority that could affect future funding consideration. We commend the entire Community Development Division staff for their continued efforts to comply with the fund's timeliness threshold at 24 CFR 570.902 of the CDBG Regulations. LFUCG's draw ratio reported in the Integrated Disbursement and Information System (IDIS) on the timeliness test date of May 2, 2011, was at 1.08. However, IDIS reports indicate no draws have been made for the 2010 CDBG program grant number B10MC210004. There is a

$47,889.62 (2%) balance of funds remaining for disbursement on the 2009 CDBG program grant number B09MC210004. The release of the 2011 CDBG funds will generate a new timeliness ratio and increase the ratio. We advise LFUCG to be aware of the inclusion of program income in tracking expenditure of funds and receipt as received. In addition, we suggest LFUCG be highly cognizant of slow moving projects that may also affect expenditures and draw funds expended on activities on a monthly basis. We appreciate your continued cooperation in this important area.

Monitoring

Monitoring provides information to make informed judgments on program effectiveness and management efficiency, as well as to identify instances of fraud, waste, and abuse. LFUCG's Division of Community Development requires subgrantees and subrecipients to report on a quarterly and annual basis for activities funded with CDBG, HOME and ESG funds. The reports provide accomplishment data including beneficiary information and racial/ethnic/gender of all subgrantee and subrecipient workforce. Activities are monitored for both program and financial records. Please include information on the monitoring of subgrantees and subrecipients with LFUCG's 2010 CAPER submission. It has been over eight years since LFUCG's ESG program was monitored. It is highly possible that this program will be monitored during HUD's 2012 fiscal year, October 1, 2011 – September 30, 2012.

Strategic Plan

LFUCG's strategy involves utilizing all available funding sources to provide safe and affordable housing for low- and moderate-income persons and persons with special needs; public improvements and neighborhood revitalization in low- and moderate-income neighborhoods; renovation of buildings and sites for community social services to low-income persons; and human service projects that will positively impact social and economic conditions for low- and moderate-income persons. The activities previously stated and funded through CDBG, HOME, ESG, program income, and other leveraged funds to address the needs of the community.

Environmental Review Procedures

Certain activities included in the Plan are subject to the provisions of 24 CFR, Part 58. Funds for such activities may not be obligated or expended unless HUD has approved the release of funds in writing. A request for release of funds must be sent to our office accompanied by an environmental certification before any funds will be released.

Reporting Requirements

Entitlement grantees are required to track disbursements and performance for each program year in the IDIS. We remind you of the importance of ensuring that IDIS data is accurate and current because the information is used as a basis in the review of the year-end CAPER and Federal Cash Transactions Report (SF-272). The new performance measurement reports should be included in your 2010 CAPER to document performance achievements. To meet citizen participation requirements, grantees must also make certain that this information is available to the public. The CAPER should be developed in an easily understood format for review by the general public. You should also ensure that race, ethnicity, and other demographic data is collected during project implementation and entered into IDIS prior to project completion, especially for CDBG-assisted housing rehabilitation activities. This demographic information is needed to complete IDIS reports, and is also used to document compliance with consolidated plan goals and fair housing requirements. The 2010 CAPER should incorporate LFUCG's performance of its 2010 CDBG, HOME and ESG Programs (July 1, 2010 through June 30, 2011). Please forward the original and five copies of the 2010 CAPER to the Office of Community Planning and Development no later than September 28, 2011.

Line-of-Credit Control System/Integrated Disbursement Information System (LOCCS/IDIS)

In order to establish a Line-of-Credit for your fiscal year 2011 grant, it is necessary to execute and return two copies of the grant agreement. If there is a need to delete, change authority, or add individuals authorized to access the IDIS, an IDIS Security Access Authorization Form must be prepared. The form must be notarized and returned to the Louisville Field Office of Community Planning and Development along with the grant agreements. If there is a need to establish or change the depository account in which these grant funds are to be wired, a Direct Deposit Sign-Up Form (SF-1199A) must be completed by you and your financial institution then mailed to this office. Upon receipt of the executed grant agreement (two copies), HUD will make the funds available through the IDIS.

Performance Measurement

Performance measurement has always been essential and is required. Grantees are required to have performance systems in place to determine if programs and projects are effectively meeting priority needs. LFUCG should have in place a fully implemented management process to ensure subrecipients, nonprofits, and other partners that receive funds through LFUCG are able to provide project performance information and input data in a timely manner for incorporation into the IDIS. We suggest project performance information be updated and entered in IDIS on a monthly basis. All CAPER reports should provide a description of how the jurisdiction's program provided new or improved availability/accessibility, affordability, sustainability of decent housing, a suitable living environment, and economic opportunity as reported in the Plan and in combination with IDIS reports to comply with performance measurement requirements.

The performance measurement system has been fully incorporated into IDIS to allow for performance data collection. The objectives and outcomes will appear on the IDIS screens and grantees select a national objective and outcome for every activity and indicate that information on the appropriate screen. Specific indicators for each activity are generated in IDIS, based on the activity matrix code and also on the national objective when the activity is funded by CDBG. The indicators will appear on an IDIS screen and grantees will report every indicator that was produced by that activity. In the case of most housing activities, grantees are expected to enter completion data by address, so that unduplicated counts of accomplishments can be obtained and reported.

A web page provides access to information relative to performance measurement. The site is updated with new information as it becomes available. This site can be accessed at: http://www.hud.gov/offices/cpd/about/performance/index.cfm. In addition, the IDIS has been reengineered and implemented for online access. Additional changes have been made to the online IDIS to provide better data input and reporting requirements.

Minority Business Enterprise (MBE) and Section 3 Activities

Executive Orders 12432 and 11625 require all Federal agencies to promote MBE participation in their programs, including women-owned businesses. The MBE report (HUD Form 2516) provides HUD with essential data on how applicable Consolidated Plan program funds (CDBG, HOME, ESG, and HOPWA) have resulted in MBE contracts/subcontracts being awarded during the program year. The MBE report, "Contract and Subcontract Activity," covers the period of October 1, 2010 – September 30, 2011. The required submission is due within 10 days of September 30, 2011. We encourage you to continue and enhance efforts to assist MBEs and WBEs.

Section 3 of the of the Housing and Community Development Act of 1968 represents the Department's policy for promoting new employment, training and contracting opportunities created during the expenditure of covered HUD financial assistance to low- and very-low income residents (regardless of race or gender) in the communities where HUD funds are spent, and the businesses that substantially employ these persons. Recipients of covered financial assistance are required to comply with Subpart B of the Section 3 Regulation found at 24 CFR Part 135.

Recipients of covered CPD funding are also required to submit Form HUD-60002 to the Office of Fair Housing and Equal Opportunity in Washington, DC annually. The Department uses the HUD-60002 data to make Section 3 compliance determinations. This report should be submitted at the same time as the Consolidated Annual Performance and Evaluation Report, and follow the same reporting period. If there is more than one type of financial assistance being received, a separate report is required for each funding source.

E.O. 12372: CDBG Special Contract Condition - Water or Sewer Facilities

Notwithstanding any other provision of this agreement, no funds provided under this agreement may be obligated or expended for the planning or construction of water or sewer facilities until receipt of written notification from HUD of the release of funds on completion of the review procedures required under Executive Order (E.O.) 12372, Intergovernmental Review of Federal Programs, and HUD's implementing regulations at 24 CFR Part 52. The recipient shall also complete the review procedures required under E.O. 12372 and 24 CFR Part 52 and receive written notification from HUD of the release of funds before obligating or expending any funds provided under this agreement for any new or revised activity for the planning or construction of water or sewer facilities not previously reviewed under E.O. 12372 and implementing regulations.

Additional Advisory Comments

The intent of the Consolidated/Action Plan is to provide the community with information on housing, social services, and economic development activities provided in Lexington and Fayette County. As a function of our review process, copies of LFUCG's 2011 Plan were distributed internally to the Field Office Director, Chief Counsel, Fair Housing and Equal Opportunity Program Center Director, Public Housing Director, and Multifamily Housing Director for review.

Comments through the Field Office Director stated that all of the activities shown in the 2011 Plan support strengthening the nation's housing market, meeting the need for quality affordable rental homes, and utilizing housing as a platform for improving the quality of life.

We suggest the Community Development Division contact the agencies noted in the creation of the 2011 Plan to report information on assistance provided by these agencies for inclusion in the 2010 CAPER. Updates on housing authority projects completed to provide low-income housing and other actual activities accomplished by these agencies should be included in the CAPER. Although these may not be CDBG, HOME and ESG funded activities, citizens need to be informed of housing options available to them. In addition, we suggest LFUCG includes in the 2012 Plan the percentage of funds LFUCG plans to dedicate to assisted target areas. The Plan is an outlet to provide citizens with needed agency information to assist with housing and housing-related programs.

The Plan shows that LFUCG is providing substantial support to area homeless service providers by funding several CDBG Public Service activities. We commend LFUCG for its continued support of the 10-year Plan to End Homelessness and the inclusion of nonprofit agencies in the creation of the Plan and proposed projects.

We appreciate LFUCG's effort in developing the Plan. The overall quality and comprehensiveness of the document reflects a well thought out approach to plan preparation and regulatory compliance.

Additional funds may be considered through the Federal Home Loan Bank Welcome Home Program and American Dream Homeownership to provide an additional source for homeownership. We appreciate the inclusion of the Citizen Participation Plan, HOME First Time Homebuyer Assistance Guidelines that includes the recapture provisions, and Affirmative Marketing Plan for the HOME program with the 2011 Plan submission. We commend LFUCG in finding solutions to address housing needs and services for the very low-income and low-to-moderate income persons it serves. We look forward to reviewing the progress LFUCG made to secure additional funding and the activities undertaken to meet its Strategic Plan goals. The HUD Louisville Office is available to assist you, please do not hesitate to contact us.

Asheville NC Consolidated Plan 'Performance Measurement'

Performance Measurement

The amount of infrastructure constructed or improved and the number of people provided with services are considered *program outputs.* Program outputs do not, in themselves, ensure that the identified needs have been met. The City plans to look more closely at measuring the actual *outcomes* of our activities – the direct effect our activities have on our intended beneficiaries. If we can achieve the program targets set out above for CDBG-assisted programs in Asheville, we hope to produce the specific outcomes shown in Table 24, on the next page.

Annual Non-Housing Outcomes and Performance Measures

Program Type	Annual Output Target	Outcome	Performance Measures	Annual Outcome Target
Street, Sidewalk, Greenway Improvements	? All Projects: 1000 linear feet	1. Improved infrastructure in targeted low-income residential areas	1. # of households that have access to improved infrastructure	100
Community Center Improvements	? One project underway in each program year	1. Improved cultural, educational and recreational opportunities for residents of targeted low-income neighborhood	1. # of households that have access to improved community center	100
Transportation Accessibility	? 2 projects (e.g. shelters) ? Multi-modal capital improvements	1. Improved infrastructure in low-income areas 2. Facility providing access and connectivity	1. persons in LI areas that have access to shelters and other facilities 2. Increase in public transit ridership	13,500 (8900 low-income) 2000 (10,000 over 5 years)
Financial, Housing and Family Support Services	? 1200 persons	1. Prevent homelessness and stabilize households 2. Improve financial well being 3. Low-income and minority households find permanent housing, including rentals and homeownership	1. # of households avoided eviction, foreclosure, or obtained safe affordable housing 2. # persons improved credit 3. # of persons keeping permanent housing for 12 month period; # of LI homebuyers, # of LI minority homebuyers	300 325 25 40 (total) 10 (minority)

Program Type	Annual Output Target	Outcome	Performance Measures	Annual Outcome Target
Homeless Services	1500 persons	1. Homeless persons will increase income by obtaining entitlement benefits 2. Engage in mental health treatment / counseling 3. Move to permanent housing	1. # persons who obtain at least one form of entitlement benefit 2. # persons attend at least one mental health treatment or counseling session 3. # persons that obtain permanent housing	10 130 25
Youth Services	80 persons	1. Students academic performance improves 2. Parent involvement increases	1. # students improve their grades & attendance 2. # parents attending meetings, trainings or volunteer w/ program	40 20
Small Business Job Creation and Retention	15 Persons	1. Jobs available to lower income persons are created 2. Jobs held by lower income persons are retained	1. # of jobs created and available to and retained by lower income persons	15
Micro-Enterprise Assistance / Job Training	160 persons for microenterprise; 40 persons for job training	1. Participants complete training program 2. Participants gain sustaining employment 3. Create or expand small businesses 4. Create jobs 5. Sustain small businesses	1. # training graduates 2. # obtaining employment 3. # of start ups & expansions 4. # of FTE jobs 5. # small businesses assisted remain operational 12 months after assistance	140 10 4 10 5

LI = Low income

FTE – Full-time equivalent

HUD TABLE 2B

The table below, in a format prescribed by HUD, identifies various types of non-housing needs and assigns a priority to each. These are not the absolute priorities for the community, but are for the use of CDBG funds, taking into account regulatory restrictions on CDBG funding, the limited amount of funding available, and the need to coordinate with other priorities in the Housing and Homelessness areas. A need given a "low" priority ranking may be very significant for the community, but the City is unlikely to be able to allocate CDBG funds to it during the next 5 years.

HUD Table 2B - Prioritization of Community Development Needs

Priority Community Development Needs	Priority for CDBG funding	Unmet Need (Gap)	Dollars to Address Unmet Need	Goals / Targets
PUBLIC FACILITY NEEDS				
Senior Centers	L	0	0	0
Handicapped Centers	L	n/a	n/a	0
Homeless Facilities (Shelter/Transitional)	L	0	0	0
Child Care Centers	L	0	0	0
Health Facilities	L	0	0	0
Neighborhood, Parks, Recreation, Youth Facilities	H	1	$3,000,000	1
Parking Facilities	L	0	0	0
Non-Residential Historic Preservation	L	20,000 sq ft	$2,500,000	1
Other Public Facility Needs	L	n/a	n/a	0
INFRASTRUCTURE				
Water / Sewer Improvements	L	186,000 LF	$18,600,000	10,000LF
Street Improvements	L	54,800 LF	$1,985,000	1500 LF
Sidewalks	H	37,200 LF	$1,000,000	5,000 LF
Solid Waste Disposal Improvements	L	n/a	n/a	n/a
Storm Drain Improvements	M	21 units	$250,000	2
Transportation Infrastructure	H	500 signs, 100 benches, 15 shelters	$480,000	15 shelters
PUBLIC SERVICE NEEDS				
Senior Services	L	500 persons	$50,000	0
Handicapped Services	L	n/a	n/a	0
Youth Services	H	1,000 persons	$500,000	400
Child Care Services	M	200 persons	$4,000,000	0
Transportation Services	H	1,500,000 trips	$3,500,000	0
Substance Abuse Services	M	500 persons	$2,500,000	0
Employment Training	H	2,000 persons	$1,250,000	200
Health Services	L	12,000 persons	$12,000,000	0

Priority Community Development Needs	Priority for CDBG funding	Unmet Need (Gap)	Dollars to Address Unmet Need	Goals / Targets
Lead Hazard Screening/Investigation	L	500 screenings	$200,000	0
Crime Awareness	L	n/a	n/a	n/a
Financial, Housing and Family Support Services	H	10,000 persons	$6,000,000	6,000
Homeless Services	H	8,000 persons	$4,000,000	7,500
ECONOMIC DEVELOPMENT				
ED Assistance to For Profit Businesses	H	10 businesses	$1,000,000	10
ED Technical Assistance to Businesses	M	500 businesses	$500,000	25
Micro-Enterprise Assistance to Businesses	H	1,500 persons or businesses	$3,000,000	800
Rehab of Publicly or Privately-Owned Commercial / Industrial Properties	H	500,000 square feet	$10,000,000	100,000
Commercial or Industrial Infrastructure Development	M	n/a	n/a	n/a
Other Economic Development Projects	L	n/a	n/a	n/a
PLANNING				
Planning	M	n/a	n/a	n/a
Total Estimated Dollars Needed:			$ 76,315,000	

Explanation of terms:

H = High Priority – CDBG funds will be used to address this area of need over the next 5 years.

M = Medium Priority – CDBG funds may be used to address this area of need.

L = Low Priority – CDBG funds are unlikely to be used to address this area of need, but the City may certify that other programs addressing the need are consistent with this Plan.

n/a = data not available

LF = linear feet

St Paul MN Consolidated Plan 'Qualitative Assessment'

Qualitative Assessment of 3- and 5- Year Consolidated Plans

Grantee: ______________________ **Date Submitted:** ______________________

Reviewer ______________________ **Total Score** ______________________

Plan Approved: (please check one) **Yes**_______ **No**_______

An assessment of the Consolidated Plan should provide HUD field staff with a tool to assist in appraising: 1) the plan's ability to articulate measurable community development objectives; 2) the grantee's capacity to leverage other public and private funds; 3) the grantee's basis for making future funding decisions, 4) the grantee's timely expenditure of funds, and 5) a grantee's need for technical assistance. The following questions and rating criteria were developed to establish a baseline for how well the community has assessed its housing and community development needs and progress grantees have made and will make to address those needs.

This is not a competition between grantees, but rather an attempt to determine the strengths and weaknesses of grantees in complying with the regulations and requirements. Using the following sets of questions, please provide an overall qualitative assessment of the Consolidated Plan. ***At the end of each question, provide a numeric score within the range provided.*** The score should correspond to your assessment of the specific part of the plan addressed by the question with a low score indicating that information provided for that category is weak or nonexistent and a high score indicating the information provided is strong.

Standard for assessing elements:

In conducting the review, please consider the following as general standards for assigning points under each element.

TOP SCORES (Best practice, Very good, Exceed requirements, or Meets requirements well)

Complete in every respect, direct, clear, comprehensive, responsive, documented, specific, or otherwise demonstrating the highest level; possibly showing a model for how this element is developed and presented; can expect to see exemplary performance in developing, operating and evaluating activities.

MEDIUM SCORES (Meets requirements, Acceptable but either barely meets requirements or may not meet all requirements)

Good qualities are evidenced but not as substantial or detailed as above, or useful with some general aspects or less comprehensive in some important elements in this approach, somewhat direct and generally responsive; can expect at least a satisfactory record of performance.

BOTTOM SCORES (Needs improvement, Unacceptable, Fails to meet requirements, Substantially incomplete)

Somewhat limited clarity, or missing important aspects, vagueness in presentation or limited in vision/planning, or of indirect or limited relevance; can expect additional assistance may be needed to carry out activities.

ZEROS (Missing)

The required element is specifically missing. Identified substantive weakness or noncompliance issue, unresolved management question or other deficiency of importance; a concern on its merits; strong potential for a serious problem.

PART A. CONSULTATION AND CITIZEN PARTICIPATION

Please use the questions that follow this paragraph to assess the Consultation and Citizen Participation process described in the plan. Please remember that one of the main objectives of citizen participation is to ensure the inclusion of a wide range of providers, citizens, advocacy groups, public and private agencies and community leaders into the process of both the development and implementation of the Consolidated Plan. The regulations clearly state that a jurisdiction is obligated to "provide for and encourage" public involvement in the development of the Consolidated Plan, any substantial amendments, and the performance report. A Plan which has established community consensus during its formulation is more likely to be successful. In addition, to establish acceptance a Plan should be easy to read and understandable, or "user friendly", and made available to the public.

CONSULTATION

Does the plan describe a process for consultation that indicates involvement by a wide range of public and private agencies (housing, public housing, community, and economic development agencies, health and social service agencies (including those focusing on services to children), advocacy groups, regional agencies, tenant organizations, clients, lending institutions or other private entities) in both the development of the plan and in its implementation? Yes ____ No ____

Consultation (0-5) ________

A score of 5 would indicate the grantee engaged in a widely inclusive consultation process that included the following:

- Grantee demonstrated evidence of meeting minimum regulatory requirements
- Grantee issued a follow-up invitation for each meeting/hearing
- Extent grantee secured on-going participation by other local agencies, non-profit organizations, tenant groups, and community organizations
- Extent grantee secured on-going participation by regional agencies responsible for

economic development, transportation, workforce development, and planning
- Grantee developed interagency agreements and coordinating bodies that can facilitate cooperation among the jurisdiction's line agencies
- Grantee consulted with lending institutions, local home builders, and other private entities

Please provide a short narrative explanation to support the exceptionally high scores that might signify best practices or low scores that might warrant technical assistance:

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CITIZEN PARTICIPATION

Has the grantee taken steps to increase the active participation of community members, including making the citizen participation process open, understandable, and inclusive of a wide range of public and private interests? Yes ____ No ____

Citizen Participation (0-5) ________

A score of 5 points would indicate the grantee used innovative means to include citizens, elicited citizen concerns effectively, shows concern for the easy access of citizens and includes the following:

- A diversity of groups were informed of and then engaged in the Consolidated Plan process.
- Easily available notices of meetings/hearing (instead of one ad in legal section of local newspaper)
- Public hearings were held during and after normal work hours and where needed were bilingual
- All citizen comments were considered during the planning process, the plan is specific in responding to all comments, and sufficient explanation is provided for any comments or views that were not accepted
- Appropriate timetables for input were provided.
- The process was driven at the grass roots level (instead of centralized from the entitlement's office)
- Grantee conducted extensive outreach (i.e., distribute brochures, mail surveys, and/or telephone surveys); task force or advisory committees were formed and held additional regional hearings

Regional is defined as adjacent cities and MPOs or COG's

Please provide a short narrative explanation to support the exceptionally high scores that might signify best practices or low scores that might warrant technical assistance:

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SPECIAL NEEDS OUTREACH

Does the description of the process for consultation and citizen participation indicate that persons with disabilities and their advocates were involved in the development of the plan?

Yes ____ No ____

Special Needs Outreach (0-5) ________

A score of 5 points would indicate the grantee used innovative means to include persons with disabilities and their advocates in the development of the plan, shows concern for the easy access of citizens, and includes the following:

- A diversity of groups were informed of and then engaged in the Consolidated Plan process.
- Grantee consulted with and secured on-going participation by health and social service agencies, non-profit organizations, advocates for persons with disabilities, and providers of affordable housing for the homeless and special needs populations
- Public hearings were accessible to persons with disabilities
- Comments of persons with disabilities and their advocates were considered during the planning process, the plan is specific in responding their recommendations, and sufficient explanation is provided for any comments or views that were not accepted

Please provide a short narrative explanation to support the exceptionally high scores that might signify best practices or low scores that might warrant technical assistance:

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Provide a Total Score for Consultation/Citizen Participation:

0-15 points ________

PART B. INTERNAL CONSISTENCY

An internally consistent Consolidated Plan is one where there is a consistent relationship between identified needs, priorities, strategies, goals/objectives, and activities. Internal consistency is demonstrated through clear language and consistent policy as documented by short, concise narratives, an executive summary, and readable tables and maps.

Provide a numeric assessment of the internal consistency of the Consolidated Plan using the following questions in the following areas:

1. Does the plan provide reasonable demographic data (i.e. relevant, quantified, and from reliable sources) to support community needs that are developed in the plan? Yes ____ No ____
2. Does the plan provide a clear, in-depth analysis of this demographic data, does the plan draw on this data to specifically state what areas of particularly acute need exist in the community, and provide a sound basis for allocation priorities? Yes ____ No ____
3. Does the Plan identify unmet needs (in the Priority Needs Table and elsewhere) and establish goals and objectives that are consistent with this analysis? Yes ____ No ____
4. Are the strategies of the plan and its overall vision consistent with needs, goals, and objectives of the plan? Yes ____ No ____
5. Are activities included in the annual action plan consistent with the Priority Needs Table, and the goals, objectives, and overall vision articulated in the plan? Yes ____ No ____

A score of 5 would mean that all priority needs, strategies, goals, objectives, projects, and activities are supported by data analysis, are clearly linked, and correspond to identified needs.

- <u>All</u> high priorities established in the tables are supported with data analysis
- Data is relevant to the issue, quantified and from reliable sources
- Includes goals and objectives to address each acute need identified
- Objectives for each area are specific, clearly stated, and consistent with needs
- Clear relationship exists in each area between needs, priorities, goals/objectives, and proposed activities
- For housing, describes how the housing market and needs of various household types provided the basis for assigning the relative priority to each priority need category specified in the Housing Needs Table
- For special needs populations, the proposed uses of federal funds match the needs of persons with disabilities in the final plan

Homeless	(0-5) points	________
Special Needs Populations	(0-5) points	________
Housing	(0-5) points	________

Community Development (0-5) points ________

Economic Development (0-5) points ________

Please provide a short narrative explanation to support the exceptionally high scores that might signify best practices or low scores that might warrant technical assistance:

For special needs populations, please provide a short narrative that explains how the proposed uses of federal funds match the needs of persons with disabilities in the final plan:

Provide an <u>Overall Consistency Score</u> for the plan:

0-25 points ________

PART C. EFFECTIVENESS

Assess the quality of the Consolidated Plan in the following areas and provide a score for each:

HOMELESS

Does the plan reference the comprehensive array of services and supportive housing that are targeted at homeless populations including those with special needs, and is there a current or planned continuum of care process that adequately addresses the needs of the homeless?

Yes ____ No ____

Homeless (0-5) ________

A score of 5 would indicate the following:

- The jurisdiction is either already in a continuum of care or has taken substantive steps to develop a continuum of care strategy (i.e. outreach, intake for clients, emergency and transitional support connects to permanent housing)
- All groups of the homeless population in the jurisdiction are effectively covered in the plan
- A wide range of community organizations have been identified as active participants in the continuum of care planning process
- The continuum of care governing body has the capacity to manage the planning process
- Measurable goals have been identified in the plan for the homeless populations
- Includes goals for moving homeless persons into permanent housing
- Timetables and schedules propose clear performance measures to achieve annual goals

Please provide a short narrative explanation to support the exceptionally high scores that might signify best practices or low scores that might warrant technical assistance:

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SPECIAL NEEDS POPULATIONS

Does the plan describe a comprehensive array of services and housing that are targeted at special populations, including the elderly, persons with disabilities, and persons with HIV/AIDS, that adequately addresses the needs of the special populations? Yes ___ No ___

Special Needs Populations (0-5) ________

A score of 5 would indicate the following:

- Identifies number of persons in various subpopulations, including the elderly, frail elderly, persons with disabilities (mental, physical, developmental, persons with HIV/AIDS and their families), persons with alcohol or other substance abuse issues
- Includes a description of housing designated for special populations, including elderly, persons with disabilities (mental, physical, developmental, persons with HIV/AIDS and their

families) and any appropriate specialized features or on-site services

- Describes facilities and services that assist persons who are not homeless but require supportive housing
- Strategies are comprehensive in scope, clearly reflect involvement of special populations, and reflect the needs of special populations
- Provides opportunities for integrating the elderly and persons with disabilities into the mainstream and/or independent living
- Clear, measurable performance goals and benchmarks have been established for annual goals and objectives
- Addresses issues of accessibility within the housing and access to healthcare, supportive services and amenities within the community

Please provide a short narrative explanation to support the exceptionally high scores that might signify best practices or low scores that might warrant technical assistance:

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HOUSING

Does the plan include effective housing strategies and goals (including annual goals) for addressing the housing needs of extremely low-income, low-income, and moderate income households, including public housing, retention of affordable rental housing, first time homeownership, and the spatial de-concentration of low income housing?

Yes ____ No ____

Housing (0-5) ________

A score of 5 should indicate a high level of confidence by the reviewer that the housing strategies and goals can be implemented with significant results for target population and indicates the following:

- All extremely low-income, low-income, and moderate-income housing populations in the jurisdiction are effectively covered in the plan
- Strategies include efforts that improve coordination of programs of public and assisted housing with the four Consolidated Plan programs and other programs whose activities are covered by the Plan
- Strategies include efforts to retain affordable rental housing, particularly units that may be lost from the assisted housing inventory
- Mobilization of a full range of partners among all levels of government and private sector,

including citizens, non-profit organizations, lending institutions, Federal Home Loan Banks, LIHTC partners to achieve housing goals
- Clear, measurable performance goals and benchmarks have been established for annual goals and objectives
- Annual action plan updates progress toward addressing needs and meeting goals, objectives, and benchmarks

Please provide a short narrative explanation to support the exceptionally high scores that might signify best practices or low scores that might warrant technical assistance:

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____

COMMUNITY DEVELOPMENT

Does the plan provide effective approaches and goals for community development that targets low income persons? Yes ____ No ____

Community Development (0-5) ________

A score of 5 should indicate a high level of confidence by the reviewer that the community development strategies and goals can be implemented with significant results for target population and indicates the following:

- Includes facilities and services that are responsive to the expressed needs of low- and moderate-income residents, including public facilities, infrastructure, public services, anti-crime activities, youth, and senior services
- Facilities and services are located in proximity to low- and moderate-income persons and minorities
- Facilities and services are delivered in a coordinated manner
- Integrates economic, physical, transportation, environmental, community, and human development to foster a suitable living environment
- Strategies and clear, measurable short-term and long-term goals and objectives are included
- Agency responsible for providing services are clearly identified
- Clear, measurable performance goals and benchmarks have been established for annual goals and objectives

Please provide a short narrative explanation to support the exceptionally high scores that might signify best practices or low scores that might warrant technical assistance:

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ECONOMIC DEVELOPMENT

Does the plan have an economic development strategy that includes effective approaches and goals for economic development (including job creation) that targets low income persons?

Yes ____ No ____

Economic Development (0-5) ________

A score of 5 should indicate a high level of confidence by the reviewer that the economic development strategies and goals can be implemented with significant results for target population and indicates the following:

- The plan includes an economic development strategy that expands economic opportunities through entrepreneurial and employment efforts either with or without HUD funds
- Strategies are well-defined, with "who, what, when, where, and why's" delineated for tracking results
- Economic development organization responsible for implementation has demonstrated capacity, skills and resources necessary for successful implementation of actions in a timely manner
- Extent of mobilization of a full range of other public and private sector partners with experience to build on strengths, identify and overcome weaknesses, leverage resources, realize specific objectives, and expand the above opportunities
- Strategy ties in to larger economic development strategies for the metropolitan region, affordable housing, workforce investment, child care, and transportation
- Strategy and plan includes clear measurable annual goals, a schedule to create and retain jobs, and a feedback mechanism that assesses the ability to achieve goals, implement projects more quickly, with greater focus on intended beneficiaries, and/or more efficiently

Please provide a short narrative explanation to support the exceptionally high scores that might signify best practices or low scores that might warrant technical assistance:

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____

LEVERAGING RESOURCES

Does the plan describe extensive leveraging of public and private resources by building effective local partnerships? Yes ____ No ____

Leveraging Resources	(0-5)	________

A score of 5 would indicate highly leveraged activities undertaken with numerous private partners

- Additional resources were identified from both the public and private sectors
- All levels of government were consulted regarding additional funding for federally assisted activities
- Local banks, CDC's, etc. were consulted/included in the process
- Commitment of resources (cash, in-kind services, land/building value and volunteer services) are specific, quantified and reasonably connected to established goals and activities
- Evidence that prior commitments were used as indicated to benefit recipients

Please provide a short narrative explanation to support the exceptionally high scores that might signify best practices or low scores that might warrant technical assistance:

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ANTI-POVERTY STRATEGY

Does the plan identify strategies and goals that will result in assisting persons out of poverty?

Yes ____ No ____

Anti-Poverty Strategy (0-5) ________

A score of 5 would indicate a high level of confidence by the reviewer that the anti-poverty strategy and goals can be implemented with significant results for target population and indicates the following:

- The grantee has defined where the households are located that are below the poverty line, and is it likely that the strategy to reduce the quantity of households below the poverty line will be successful
- There are clear strategies and methods for outreach to persons living below poverty, including persons with disabilities
- The strategies include linkages to welfare-to-work initiatives, including workforce development planning, job training and placement services, child care and transportation
- The plan contains and outline (in user-friendly, practical terms) and methodology to address poverty
- The strategy shows linkages to resources, organizations, and other initiatives that are currently underway or planned
- Identifies how many households will be assisted out of poverty as a result of policies and programs

Please provide a short narrative explanation to support the exceptionally high scores that might signify best practices or low scores that might warrant technical assistance:

Total Part C (Questions 1-7) of the Qualitative Assessment and provide an overall rating of the plan according to its innovative approaches, the coordination of the plan, and the targeting of resources to extremely low-income, low-income, and moderate-income households.

Provide a Score for Effectiveness **(0-35)** ________

Please provide a short narrative to describe any notable attributes of the plan, or deficiencies, indicated by the scores above.

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PART D. COMPLIANCE

Rate the overall approach described in the Consolidated Plan as regards compliance issues.

Do so by answering the following questions:

MONITORING

Does the grantee describe credible, effective procedures and standards for monitoring activities described in the plan? Yes ____ No ____

A score of 10 would indicate the following:

- Strategic Plan and annual Action Plan identifies specific steps/actions the grantee will take to monitor housing, homeless, HOPWA (or Special Needs), and community and economic development projects, assess progress and timely expenditure of funds, and ensure compliance with program requirements and comprehensive planning requirements
- Grantee monitoring system ensures grantee and subrecipients document eligibility of recipients and activities and actual accomplishments, meet performance goals and financial and legal responsibilities, including collection and submission of accurate performance data in a timely manner
- Grantee plan describes actions it will take during the program year to monitor its subrecipients and provide technical assistance, guidance, or other corrective actions
- Plan describes actions to ensure compliance with housing codes, including any actions or on-site inspections it plans to undertake during the program year

Monitoring (0-10) ________

Please provide a short narrative explanation to support the exceptionally high scores that might signify best practices or low scores that might warrant technical assistance:

____

____

____

ACTION PLAN

Do the activities described in the Annual Action Plan raise concerns about compliance?

Yes ____ No ____

- Specifically, are there reasons to question the eligibility or viability of specific activities of Consolidated Plan programs described in the Action Plan?
- Are there activities that raise questions about the ability of the grantee to remain within timeliness guidelines for each program?
- Can the grantee fit activities within the applicable caps on spending for services and planning and administration?
- Are there other outstanding compliance concerns with this plan?

Annual Action Plan Compliance	(0-10)	________

Please provide a short narrative explanation to support the exceptionally high scores that might signify best practices or low scores that might warrant technical assistance:

____

____

____

AFFIRMATIVELY FURTHERING FAIR HOUSING

Does the grantee affirmatively further fair housing? Yes ____ No ____

Affirmatively Furthering Fair Housing	(0-05)	________

A score of 5 would indicate the following:

- A certification is included and accurate
- Extent to which Federal and local accessibility code requirements are met
- Fair housing complaint procedures are clearly identified
- Strategies for detecting discrimination are included
- Actions to remove impediments to fair housing choice are identified in the annual action plan.

Please provide a short narrative that takes into consideration a community's adoption of a building code that complies with the Fair Housing Accessibility Guidelines and a community's effort to remove "impediments" to fair housing:

____

____

____

Overall Compliance Score

Give an overall compliance score based on your assessment of the grantee's ability to carry out the activities of the plan in a timely manner and within the constraints of existing statutory and regulatory program requirements.

Compliance Rating (0-25) ________

Provide a short narrative if there are compliance issues of note either of a positive or negative nature.

____

____

____

____

Assessment Score (0-100) ________

E. BONUS POINTS

NEIGHBORHOOD/REGIONAL PLANNING

Has the grantee taken into consideration the needs of low income persons and families residing in specific neighborhoods and regions? Yes ____ No ____

Neighborhood Planning/Regional Planning (0-5) points ________

A score of 5 bonus points would indicate the following:

- Jurisdiction has identified the specific needs of neighborhoods/regions
- The jurisdiction has a plan to implement strategies on a neighborhood, community, or

regional basis

- Strategies are comprehensive in scope, clearly reflect involvement of neighborhood residents, and reflect the needs of neighborhood residents or regions
- Jurisdiction submitted or received approval for Neighborhood/Community Revitalization Strategy Areas
- For HOPWA recipient, reflects a comprehensive approach to needs within metro area or State service area
- Task Force or advisory committees were formed and held additional regional hearings

Regional is defined as adjacent cities, counties, MPOs, or COGs

Please provide a short narrative explanation to support the exceptionally high scores that might signify best practices or low scores that might warrant technical assistance:

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____

PUBLIC HOUSING

Does the plan include effective strategies to address the needs of public housing and was there meaningful consultation with residents and representatives from public housing to determine the needs of public housing, including the needs of persons on waiting lists? Yes ____ No ____

Public Housing (0-5) ________

A score of 5 bonus points would indicate the following:

- The level of involvement was more than a one-time one-on-one conversation between the entitlement's representative and a PHA representative, but group meetings with the resident advisory committee were held, as well as with the management of the PHA)
- There was input from the neighborhood surrounding the PHA property
- There is a reference to the needs of public housing identified in the PHA's 5-year plan, annual plan, or both and how they will be addressed
- Programs funded under public housing and programs covered by consolidated plan are fully coordinated to achieve comprehensive community development goals, i.e. linkages with jobs, neighborhood revitalization, infrastructure, access to services for persons with disabilities and other special needs

Please provide a short narrative explanation to support the exceptionally high scores that might signify best practices or low scores that might warrant technical assistance:

____

____

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____

OTHER

Provide a short narrative for additional bonus category where there have been notable improvements in the plan, creative presentations of the Plan i.e., bonus for usability, or to identify other factors that may warrant a higher score.

____

____

____

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____

Other	**(0-5)**	________
Total Bonus Points	**(0-15)**	________

<u>Total Consolidated Plan Qualitative Assessment Score</u>

The total Assessment Score, obtained by summing the scores for Section A -- Consultation and Citizen Participation; Section B -- Internal Consistency; Section C – Effectiveness; Section D – Compliance; and Section E – Bonus Points should be indicated below:

Assessment Score	**(0-100)**	________
Bonus Points	**(0-15)**	________
Total Assessment Score	**(0-115)**	________

Introduction and Executive Summary

The Consolidated Annual Performance Evaluation Report (CAPER) examines Baltimore City's efforts in meeting the community development goals set forth in its Consolidated Plan. The Consolidated Plan is a federally required planning document that helps guide and describe community development efforts in Baltimore City and serves as the application request for funding from four federal housing and community development programs. The Plan, while having many required components, has an overall tripartite structure: 1) an analysis of housing and community development needs; 2) a statement of strategies to address identified needs; and 3) a detailed listing of activities that implement proposed strategies. The needs assessments and strategies, while they can be amended, remain constant for the Plan's five-year period, while the implementing activities are updated annually. It is the annual listing that most visibly serves as the application for the four federal formula grant programs. This Consolidated Plan was published in July 2005, and served as a planning and implementation document for community development efforts until June 2010. A new Consolidated Plan covering the five-year period July 2010 through June of 2015 went into effect this past July. Much of the content and structure of the report is based on U.S. Department of Housing and Community Development (HUD) requirements.

The CAPER primarily, and specifically, discusses the use of funds associated with four Federal programs – Community Development Block Grants (CDBG); Home Investment Partnership (HOME); Housing Opportunities for People with AIDS (HOPWA); and Emergency Shelter Grants (ESG). However, its scope extends to other Baltimore City activities and initiatives that relate to housing and community development. This report compares the City's actual performance during fiscal year 2010 - July 1, 2009 through June 30, 2010, also known as Federal Program Year 2008 - to the performance proposed in the Consolidated Plan and generally describes community development activities and actions undertaken in Baltimore City during the fiscal year. As this is the final CAPER covering the 2005 – 2010 Consolidated Plan the report also lists actions and activities that occurred during the five-year period and compares these outcomes to the five-year goals established in the now completed Plan.

The CAPER is divided into eight sections. The first, General Narrative Requirements, is an overview of community development activities and funding, and their relationship to the Consolidated Plan. Its largest sub-section, the assessment of Consolidated Plan goals and objectives, quantifies achievements relative to some eighty objectives established in the Plan for the following strategic areas: Affordable Housing, Homelessness, Special Needs Populations, Community Development, Public Housing, Lead Paint Hazard Reduction, and Anti-Poverty efforts. Each objective is identified by the unique alpha/numeric code it was assigned in the Plan.

The General Narrative also includes sub-sections examining efforts to further fair housing, to address the needs of the homeless (Continuum of Care Narrative), and to leverage resources for community development efforts. Other sub-sections in this portion of the CAPER include the Other Actions narrative that discusses issues affecting the institutional structure by which Consolidated Plan strategies are carried out and efforts to ensure compliance with programmatic requirements.

The General Narrative section also includes a listing of Federal fiscal resources made available and expended in the fiscal year to carry out Consolidated Plan activities The section concludes