

# 2019 Annual Action Plan CARES Act Amendment (Reallocation of Unused CARES Funds) DRAFT

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# **Table of Contents**

Executive Summary	3
AP-05 Executive Summary - 24 CFR 91.200(c), 91.220(b)	3
PR-05 Lead & Responsible Agencies – 91.200(b)	8
AP-10 Consultation – 91.100, 91.200(b), 91.215(l)	9
AP-12 Participation – 91.105, 91.200(c)	19
Expected Resources	26
AP-15 Expected Resources – 91.220(c)(1,2)	26
Annual Goals and Objectives	30
AP-20 Annual Goals and Objectives	30
Projects	32
AP-35 Projects – 91.220(d)	32
AP-38 Project Summary	34
AP-50 Geographic Distribution – 91.220(f)	44
Affordable Housing	45
AP-55 Affordable Housing – 91.220(g)	45
AP-60 Public Housing – 91.220(h)	46
AP-65 Homeless and Other Special Needs Activities – 91.220(i)	48
AP-75 Barriers to affordable housing – 91.220(j)	50
AP-85 Other Actions – 91.220(k)	52
Program Specific Requirements	55
AP-90 Program Specific Requirements – 91.220(I)(1,2,4)	55

CARES Act Amendment to add CDBG CARES Act funds in the 2019 AAP updated citizen participation plan is attached. The amendment now includes CV1 & CV3 for a total of \$1,779,847. Updated citizen participation plan is attached. (CDBG-CV Reallocation of Unused Funds): The City will make a substantial amendment to the 2019 AAP CARES Act Amendment to reallocate unspent funds from public services to public improvements and new public services that will benefit residents affected by COVID-19.

# **Executive Summary**

## AP-05 Executive Summary - 24 CFR 91.200(c), 91.220(b)

#### 1. Introduction

The Annual Action Plan (AAP) for Year 45 (YR45) covers July 1, 2019 - June 30, 2020 for the use of Community Development Block Grant (CDBG) and HOME Investment Partnerships Program (HOME) funds. YR45 is the fifth year of the City of Stamford's 5 year Consolidated Plan. The AAP shows how the City of Stamford will use community development resources to address the needs of Stamford's low and moderate income residents. 100% of those served will be low or moderate income.

#### **CARES Act Amendment**

On March 27, 2020 the Federal Coronavirus Aid, Relief and Economic Security Act (CARES) was signed into law to assist communities in their efforts to prevent, prepare for and respond to the coronavirus (COVID-19) pandemic. The CARES Act included supplemental formula allocations to HUD's CPD programs, such as CDBG-CV for the City of Stamford. The additional CDBG-CV CARES Act funds allocated to the City was \$574,820, with provisions that suspends the 15% cap on public services and allows HUD to waive further program requirements if necessary. This AAP has been amended to reflect the additional CDBG-CV funds, and how those funds will be used to help residents affected by COVID-19.

CARES Act Amendment (CDBG-CV3): On September 11, 2020, HUD made available the remaining CDBG-CV allocation funds to entitlement grantees. The allocation named CDBG-CV3 (Allocation 3 – Part A) will be the final allocation for CDBG CARES Act funding. The CDBG-CV3 formula allocation was developed by HUD to meet the statutory requirements of the CARES Act and the President's August 8, 2020 Executive Order "Fighting the Spread of COVID-19 by Providing Assistance to Renters and Homeowners." The CDBG-CV3 funding allocated to the City of Stamford is \$1,205,027 and the Annual Action Plan has been amended to reflect the additional CDBG-CV funding. Total funding from CDBG-CV1 and CDBG-CV3 is now \$1,779,847.

#### **CARES Act Amendment (CDBG-CV Reallocation of Unused Funds):**

The City will make a Substantial Amendment to the 2019 AAP CARES Act Amendment and will reallocate \$1,229,027 in unspent CARES funds for the following purposes: \$900,472 for Public Services for the

hungry, homeless, youth, elderly, victims of domestic violence and other low income persons (\$219,432 of which is for pre-agreement costs); \$270,055 for Public Improvements to facilities and infrastructure including a safe house, childcare center, rehab center, park, and sidewalks; and \$58,500 for CV-Grant Administration. All activities funded with CDBG-CV will prevent, prepare for and respond to the coronavirus (PPR). The substantial amendment has been made to these areas in the plan:

ES-05: An introduction and citizen participation efforts has been added to the executive summary.

AP-12: A summary of citizen participation efforts for the substantial amendment has been provided.

AP-20: CDBG-CV funds have been reallocated to the goals to match the project allocations.

AP-35: Two CV projects have been added: CV-Public Improvements and CV-Housing

#### 2. Summarize the objectives and outcomes identified in the Plan

See AP-35 and AP-38 for a complete review of the objectives and outcomes identified in the AAP. The AAP allocates funds to provide decent housing, create a suitable living environment and promote economic opportunities, through a total of 25 CDBG activities, and HOME budget line items. The City was allocated \$903,194 in CDBG funds for YR45. CDBG funds address the decent housing objective with four activities totaling \$446,212. Activities will focus on improving the sustainability of low income housing complexes. The Stamford Community Development Program will support an additional 50 units through program delivery of other CDBG/HOME/NSP activities. HOME funds will be used to create units of affordable housing by rehabilitating rental units, assisting in construction of new units, and by providing down payment assistance. A total of \$392,561 in YR45 HOME funds and an additional \$50,000 in repaid HOME loan funds are available to the City of Stamford for the creation of affordable housing under the HOME program. Sixteen public service activities, receiving a total of \$135,479, will help create a suitable living environment. Activities include health and homeless related services, services for seniors, services to domestic violence victims and activities for youth. Six public improvement activities totaling \$253,090 will assure sustainability of a homeless shelter and services facility, improve handicapped accessibility, and enhance energy efficiency for a child care facility and a mental health facility. \$23,936 will be held in contingency for approved public improvement or housing projects that require additional funds.

#### 3. Evaluation of past performance

In YR44 (2018-2019) the City of Stamford expended 100% of its CDBG Public Service and HOME funds on projects or activities that benefited low- and moderate-income individuals, which exceeded the 70% required by statute. Expenditures for public service activities were below the 15% cap and the expenditures for planning and administration were kept below the 20% cap. The City did not pass the May 2, 2019 timeliness test. HUD's review of the previous grant year (2018) determined that the City of Stamford's performance was unsatisfactory. (HUD rates "Connecticut grantees' overall performance in carrying out their programs as either satisfactory or unsatisfactory.")

**Annual Action Plan** 

## 4. Summary of Citizen Participation Process and consultation process

The Citizen Participation Process and consultation process occurred as outlined in the attached Citizen Participation Plan and Public Hearing/Application Schedule. The document is included with each application packet and defines the publication schedule, goals and public hearing dates and procedures. Legal notices where published in The Advocate and information was distributed by email and made available online. Two public hearings were held on January 28, 2019 and March 18, 2019. Documents were made available online, at the Government Center in the Community Development Office. The Citizen Participation Process impacts the funding process as applications and presentations inform and connect the committee with the needs of the CDBG target population. In addition, the Housing and Community Development/Social Services (HCD/SS) Committee of the Board of Representatives meets on issues pertaining to housing and community development. The Committee meets monthly. Anyone interested in meeting with HCD/SS Committee may contact the Community Development Director or the Chairperson of HCD/SS in care of the office of the Board of Representatives in the Government Center. The Community Development staff is available throughout the year to receive verbal or written comments regarding HUD funded activities and suggestions by citizens on how to improve the use of HUD funds in Stamford. Community development staff attend neighborhood meetings and participate in the regional CoC - Opening Doors Fairfield County. All applications funded advance the priorities and goals outlined in the Consolidated Plan.

#### **CARES Act Amendment**

The City of Stamford under the provision of the CARES Act held a 5-day public comment period from May 20, 2020 to May 27, 2020. The Plan could be downloaded and viewed from the City's website at: https://www.stamfordct.gov/community-development-office

A virtual public hearing was held on June 15, 2020 at 6:30 PM to inform the public of the substantial amendment to the 2019 AAP. HUD provisions allow for the suspension of in-person public hearings, but allows grantees the option to hold virtual online hearings.

#### **CARES Act Amendment (CDBG-CV3):**

The City of Stamford under the provision of the CARES Act held a 5-day public comment period from June 23, 2021 to June 28, 2021. The Plan could be downloaded and viewed from the City's website at: https://www.stamfordct.gov/community-development-office

There were no comments received from the public.

#### **CARES Act Amendment (CDBG-CV Reallocation of Unused Funds):**

30-DAY PUBLIC COMMENT: The Substantial Amendment to the 2019 AAP will be available for review and comment from March 28, 2022 to April 27, 2022 via the City's Community Development website,

https://www.stamfordct.gov/community-development-office and from 9:00am to 4:00pm, Monday-Friday, at the Stamford Community Development Office (when open to the public), 888 Washington

Blvd. 7<sup>th</sup> Floor, Stamford, CT. Written comments on amendment should be submitted through the online

form available at https://www.stamfordct.gov/community-development-office or to the Stamford

Community Development Office at the above address.

PUBLIC HEARING: On Tuesday, April 26, 2022 at 6:30pm virtually, the Housing, Community Development

and Social Services (HCD/SS) Committee of the Board of Representatives will hold a public meeting to accept verbal or written comments from citizens regarding the proposed amendment to the AAP. The

meeting will be held remotely via Zoom online platform. For more Information please see:

http://www.boardofreps.org/calendar.aspx

5. **Summary of public comments** 

At the January 28, 2019 public hearing each applicant for CDBG funds spoke about their programs and

the needs of their clients. No other comments were received. A draft AAP was made available and a second public hearing was held on March 18, 2019, no comments were received. See the attachment

Citizen Participation Legal Notices YR45 APP for minutes, sign in sheets and legal notices.

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

No comments or views were rejected or not accepted.

7. Summary

The AAP builds on and enhances the work done to develop the Consolidated Plan and YR44 AAP. The

activities funded addresses the needs of our community.

In addition to the activities funded from annual HUD allocations, this AAP has been amended to reflect

additional CDBG-CV funds, and how those funds will be used to help residents affected by COVID-19.

**CARES Act Amendment** 

CARES Act funds allocated to entitlement grantees came in three rounds, of which the City of Stamford

received Round 1 & Round 3 grants for CDBG-CV:

Round 1: \$574,820 for CDBG-CV1

Round 2: \$0

Round 3: \$1,205,027 for CDBG-CV3

Annual Action Plan 2019

6

This AAP has been amended to reflect the addition of CDBG-CV funds. Funds will be used towards vital public services that are tied to efforts that prevent, prepare for and respond to the coronavirus (COVID-19) pandemic. Total funding from CDBG-CV1 and CDBG-CV3 is a combined \$1,779,847.

# PR-05 Lead & Responsible Agencies – 91.200(b)

# 1. Agency/entity responsible for preparing/administering the Consolidated Plan

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

Agency Role	Name	Department/Agency		
CDBG Administrator	STAMFORD	Community Development Office		
HOME Administrator	STAMFORD	Community Development Office		

Table 1 – Responsible Agencies

#### **Consolidated Plan Public Contact Information**

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# AP-10 Consultation - 91.100, 91.200(b), 91.215(l)

#### 1. Introduction

The Annual Action Plan is informed by ongoing collaboration between City departments and local and regional non-profit agencies. The Community Development Office and the BOR HCD/SS Committee regularly consults agencies serving the needs of Stamford's LMI residents.

Provide a concise summary of the jurisdiction's activities to enhance coordination between public and assisted housing providers and private and governmental health, mental health and service agencies (91.215(I))

The City continues to work closely with The Community Action Agency of Western Connecticut - the State funded CAP agency serving Stamford and provides the agency with office and program space in a City owned building. The City is negotiating with a local non-profit service provider to lease space in a City building which will allow the agency to provide enhanced casework services, access to food, clothing, and emergency financial assistance to Stamford LMI residents. The City consults with regional nonprofits such as the United Way of Western Connecticut and Fairfield County's Community Foundation to ensure awareness and coordination of efforts to meet the needs of housing providers, health, mental health and service agencies. The City works with the Opening Doors Fairfield County (ODFC) to ensure our efforts align with regional work to address the challenge of homelessness. In the arena of public and assisted housing the City consults with and regularly funds numerous not-for-profit affordable housing developers such as New Neighborhoods, Inc., Mutual Housing Association of Southwestern Connecticut and the Housing Authority of the City of Stamford (dba Charter Oak Communities).

Describe coordination with the Continuum of Care and efforts to address the needs of homeless persons (particularly chronically homeless individuals and families, families with children, veterans, and unaccompanied youth) and persons at risk of homelessness.

homeless persons (particularly chronically homeless individuals and families, families with children, veterans, and unaccompanied youth) and persons at risk of homelessness.

Stamford regularly participates and supports the efforts of the Fairfield County Continuum of Care (CoC) known as Opening Doors Fairfield County (ODFC). The City remains abreast of regional efforts to address the needs of homeless persons and persons at risk of homelessness. The City supports ODFC's application and provides assistance with the Environmental Review process. The City allocates CDBG funds to support programs and services that address the root causes of homelessness and provides support to address the needs of those who are homeless. The towns surrounding Stamford do not provide emergency, transitional or supportive housing shelters, Stamford's shelters must also serve the needs of the surrounding communities.

The City supports Pacific House, Inc. (f/k/a Shelter for the Homeless, Inc.), Inspirica, Inc., and Laurel House, Inc. One example of the efforts to address the needs of homeless persons is the work done by Laurel House which seeks to quickly connect individuals experiencing homelessness and living with serious mental illness to permanent housing and supplemental services. They participate in ODFC to streamline Coordinated Assessment and access with Pacific House, Inc. and Inspirica, Inc. Laurel House uses HMIS to collect demographic and service information to provide data on homelessness for Southwestern, CT and the state and considers the VI-SPDAT and chronicity to prioritize referred candidates.

Laurel House has a Support Plus program which provides Permanent Supportive Housing (PSH) with enhanced support and supervision to chronically homeless individuals living with serious mental illness and other disabilities which further compromise their health. Support Plus is a hybrid program that was developed by Laurel House and endorsed by the then Stamford-Greenwich CoC, in response to an identified gap in appropriate services for seriously disabled individuals who need additional supports and a degree of supervision in order to succeed in PSH and to age in place where possible, without needing greater levels of specialized care.

Laurel House and Mutual Housing Association of CT work together to provided permanent supportive housing services to 13 individuals living with mental illness, four of whom are chronically homeless and two with a history of chronic substance abuse. Participants are assigned a Residential Services Counselor who works to implement the individual's Recovery Plan using services, as appropriate, provided at the Laurel House Resource Center including: Supported Education, Supported Employment, food service, wellness, cognitive remediation, social opportunities and events. The Laurel House service model is an outbound model that provides Supported Housing residents services in their homes or at school, at work or in the community.

Describe consultation with the Continuum(s) of Care that serves the jurisdiction's area in determining how to allocate ESG funds, develop performance standards for and evaluate outcomes of projects and activities assisted by ESG funds, and develop funding, policies and procedures for the operation and administration of HMIS

The City does not receive ESG funds. The City supports and participates in the ODFC. ODFC receives funds for the HMIS system through the annual NOFA. Homeless service providers are trained in HMIS use, and ODFC seeks to "Ensure that there is a single, functioning Homeless Management Information System (HMIS) and uniform manner to collect data for the ODFC area. Ensure there is at least an annual Point in Time count of homeless persons in the ODFC region." ODFC has created a Standards and Evaluations Committee. The Committee duties include:

- 1. Establish performance targets appropriate for population and program type.
- 2. Establish remedial action protocol for low performing grantees.

- 3. Establish written standards for providing assistance, as outlined in HUD Interim Rule § 575.7(a)(9). Ensure compliance with HUD standards.
- 4. Monitor Homeless Management Information System (HMIS) participation and compliance.
- 5. Monitor grantee performance, evaluate outcomes and take action against poor performers, as appropriate.
- 6. Monitor ESG funded programs and provide performance targets and feedback to appropriate funding entities.
- 2. Describe Agencies, groups, organizations and others who participated in the process and describe the jurisdiction's consultations with housing, social service agencies and other entities

Table 2 – Agencies, groups, organizations who participated

1	Agency/Group/Organization	
1		Kids In Crisis, Inc.
	Agency/Group/Organization Type	Services-Children
		Services-Health
	What section of the Plan was addressed by	Non-Homeless Special Needs
	Consultation?	
	Briefly describe how the	Through public hearings, reports, site visits, verbal
	Agency/Group/Organization was consulted.	and written correspondence, the CD office
	What are the anticipated outcomes of the	consulted local and area service agencies.
	consultation or areas for improved	Feedback from service providers was incorporated
	coordination?	into the Consolidated Plan and the Annual Action
		Plan.
2	Agency/Group/Organization	Bartlett Arboretum Association
	Agency/Group/Organization Type	Services-Children
		Services-Education
	What section of the Plan was addressed by	Non-Homeless Special Needs
	Consultation?	'
	Briefly describe how the	Through public hearings, reports, site visits, verbal
	Agency/Group/Organization was consulted.	and written correspondence, the CD office
	What are the anticipated outcomes of the	consulted local and area service agencies.
	consultation or areas for improved	Feedback from service providers was incorporated
	coordination?	into the Consolidated Plan and the Annual Action
		Plan.
3	Agency/Group/Organization	FOOD BANK OF LOWER FAIRFIELD COUNTY, INC.
	Agency/Group/Organization Type	Food Bank Program
	What section of the Plan was addressed by	Community Development Needs
	Consultation?	
	Briefly describe how the	Through public hearings, reports, site visits, verbal
	Agency/Group/Organization was consulted.	and written correspondence, the CD office
	What are the anticipated outcomes of the	consulted local and area service agencies.
	consultation or areas for improved	Feedback from service providers was incorporated
	coordination?	into the Consolidated Plan and the Annual Action
		Plan.
4	Agency/Group/Organization	BOYS AND GIRLS CLUB OF STAMFORD, INC.
	Agency/Group/Organization Type	Services-Children
L		

	What section of the Plan was addressed by	Community Development Needs
	Consultation?	
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Through public hearings, reports, site visits, verbal and written correspondence, the CD office consulted local and area service agencies.  Feedback from service providers was incorporated into the Consolidated Plan and the Annual Action Plan.
5	Agency/Group/Organization	CHILD GUIDANCE CENTER OF SOUTHERN, CT, INC
	Agency/Group/Organization Type	Services-Children Services-Health
	What section of the Plan was addressed by Consultation?	Non-Homeless Special Needs
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Through public hearings, reports, site visits, verbal and written correspondence, the CD office consulted local and area service agencies.  Feedback from service providers was incorporated into the Consolidated Plan and the Annual Action Plan.
6	Agency/Group/Organization	Person to Person
	Agency/Group/Organization Type	Services - Housing Services-homeless Services-Health
	What section of the Plan was addressed by Consultation?	Homeless Needs - Families with children Non-Homeless Special Needs
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Through public hearings, reports, site visits, verbal and written correspondence, the CD office consulted local and area service agencies.  Feedback from service providers was incorporated into the Consolidated Plan and the Annual Action Plan.
7	Agency/Group/Organization	SilverSource, Inc.
	Agency/Group/Organization Type	Services-Elderly Persons
	What section of the Plan was addressed by Consultation?	Non-Homeless Special Needs

	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Through public hearings, reports, site visits, verbal and written correspondence, the CD office consulted local and area service agencies.  Feedback from service providers was incorporated into the Consolidated Plan and the Annual Action Plan.
8	Agency/Group/Organization	Friends of Liberation Programs, Inc.
	Agency/Group/Organization Type	Services-Health
	What section of the Plan was addressed by Consultation?	Non-Homeless Special Needs
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Through public hearings, reports, site visits, verbal and written correspondence, the CD office consulted local and area service agencies.  Feedback from service providers was incorporated into the Consolidated Plan and the Annual Action Plan.
9	Agency/Group/Organization	SEXUAL ASSAULT CRISIS AND EDUCATION CENTER, INC.
	Agency/Group/Organization Type	Services-Victims of Domestic Violence
	What section of the Plan was addressed by Consultation?	Non-Homeless Special Needs
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Through public hearings, reports, site visits, verbal and written correspondence, the CD office consulted local and area service agencies.  Feedback from service providers was incorporated into the Consolidated Plan and the Annual Action Plan.
10	Agency/Group/Organization	Inspirica, Inc.
	Agency/Group/Organization Type	Housing Services-Persons with Disabilities Services-Persons with HIV/AIDS Services-homeless
	What section of the Plan was addressed by Consultation?	Homeless Needs - Families with children

	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Through public hearings, reports, site visits, verbal and written correspondence, the CD office consulted local and area service agencies.  Feedback from service providers was incorporated into the Consolidated Plan and the Annual Action Plan.
11	Agency/Group/Organization	Pacific House, Inc.
	Agency/Group/Organization Type	Services-homeless
	What section of the Plan was addressed by Consultation?	Homeless Needs - Chronically homeless Homelessness Needs - Veterans
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Through public hearings, reports, site visits, verbal and written correspondence, the CD office consulted local and area service agencies.  Feedback from service providers was incorporated into the Consolidated Plan and the Annual Action Plan.
12	Agency/Group/Organization	DOMUS kids, INC.
	Agency/Group/Organization Type	Services-Children
	What section of the Plan was addressed by Consultation?	Non-Homeless Special Needs
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Through public hearings, reports, site visits, verbal and written correspondence, the CD office consulted local and area service agencies.  Feedback from service providers was incorporated into the Consolidated Plan and the Annual Action Plan.
13	Agency/Group/Organization	YMCA OF STAMFORD, INC.
	Agency/Group/Organization Type	Services-Children
	What section of the Plan was addressed by Consultation?	Community Development Needs
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Through public hearings, reports, site visits, verbal and written correspondence, the CD office consulted local and area service agencies.  Feedback from service providers was incorporated into the Consolidated Plan and the Annual Action Plan.

14	Agency/Group/Organization	International Institute of Connecticut, Inc.		
	Agency/Group/Organization Type	Services-Children		
		Services-Elderly Persons		
		Legal Services		
	What section of the Plan was addressed by Consultation?	Non-Homeless Special Needs		
	Briefly describe how the	Through public hearings, reports, site visits, verbal		
	Agency/Group/Organization was consulted.	and written correspondence, the CD office		
	What are the anticipated outcomes of the	consulted local and area service agencies.		
	consultation or areas for improved	Feedback from service providers was incorporated		
	coordination?	into the Consolidated Plan and the Annual Action Plan.		
15	Agency/Group/Organization	Domestic Violence Crisis Center, Inc.		
	Agency/Group/Organization Type	Services-Children		
		Services-Victims of Domestic Violence		
	What section of the Plan was addressed by	Non-Homeless Special Needs		
	Consultation?	·		
	Briefly describe how the	Through public hearings, reports, site visits, verbal		
	Agency/Group/Organization was consulted.	and written correspondence, the CD office		
	What are the anticipated outcomes of the	consulted local and area service agencies.		
	consultation or areas for improved	Feedback from service providers was incorporated		
	coordination?	into the Consolidated Plan and the Annual Action		
		Plan.		
16	Agency/Group/Organization	COMMUNITY HEALTH CENTER, INC.		
	Agency/Group/Organization Type	Services-Elderly Persons		
	What section of the Plan was addressed by Consultation?	Non-Homeless Special Needs		
	Briefly describe how the	Through public hearings, reports, site visits, verbal		
	Agency/Group/Organization was consulted.	and written correspondence, the CD office		
	What are the anticipated outcomes of the	consulted local and area service agencies.		
	consultation or areas for improved	Feedback from service providers was incorporated		
	coordination?	into the Consolidated Plan and the Annual Action		
		Plan.		
17	Agency/Group/Organization	CHIDRENS LEARNING CENTERS OF FAIRFIELD COUNTY, INC.		
	Agency/Group/Organization Type	Services-Children		
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	What section of the Plan was addressed by	Non-Homeless Special Needs
	Consultation?	·
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Through public hearings, reports, site visits, verbal and written correspondence, the CD office consulted local and area service agencies.  Feedback from service providers was incorporated into the Consolidated Plan and the Annual Action Plan.
18	Agency/Group/Organization	ARI, INC.
	Agency/Group/Organization Type	Services-Persons with Disabilities
	What section of the Plan was addressed by Consultation?	Non-Homeless Special Needs
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Through public hearings, reports, site visits, verbal and written correspondence, the CD office consulted local and area service agencies.  Feedback from service providers was incorporated into the Consolidated Plan and the Annual Action Plan.
19	Agency/Group/Organization	Abilis, Inc.
	Agency/Group/Organization Type	Services-Children
	What section of the Plan was addressed by Consultation?	Non-Homeless Special Needs
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Through public hearings, reports, site visits, verbal and written correspondence, the CD office consulted local and area service agencies.  Feedback from service providers was incorporated into the Consolidated Plan and the Annual Action Plan.
20	Agency/Group/Organization	NEW NEIGHBORHOODS, INC.
	Agency/Group/Organization Type	Housing
	What section of the Plan was addressed by Consultation?	Housing Need Assessment

Briefly describe how the	Thr
Agency/Group/Organization was consulted.	and
What are the anticipated outcomes of the	con
consultation or areas for improved	Fee
coordination?	into

Through public hearings, reports, site visits, verbal and written correspondence, the CD office consulted local and area service agencies.

Feedback from service providers was incorporated into the Consolidated Plan and the Annual Action Plan.

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

All comments were accepted. There were no agency types not intentionally consulted.

#### Other local/regional/state/federal planning efforts considered when preparing the Plan

Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
Couling on a Count	Opening Doors Fairfield	Plans provide support for emergency shelters,
Continuum of Care	County	supportive services, transitional housing
City Of Stamford Master	City of Stamford	Emphasis on providing housing choice for all
Plan	City of Staffilord	income groups
Charter Oak Communities Major Agency5 YR Plan	Housing Authority of the City of Stamford	Preservation and creation of LMI units
Proposed 2019 CDBG	Town of Greenwich	Plans provide support for emergency shelters,
Action Plan	Town or dreenwich	supportive services, transitional housing
	Stamford Environmental	Plans support Stamford's health department in
Stamford Lead Team	Health & Inspection	addressing housing units in which children have
	Services	been identified as lead-poisoned.

Table 3 – Other local / regional / federal planning efforts

# **AP-12 Participation – 91.105, 91.200(c)**

1. Summary of citizen participation process/Efforts made to broaden citizen participation Summarize citizen participation process and how it impacted goal-setting

#### **CARES Act Amendment**

The City of Stamford under the provision of the CARES Act held a 5-day public comment period from May 20, 2020 to May 27,2020. The Plan could be downloaded and viewed from the City's website at: https://www.stamfordct.gov/community-development-office

A virtual public hearing was held on June 15, 2020 at 6:30 PM to inform the public of the substantial amendment to the 2019 AAP. HUD provisions allow for the suspension of in-person public hearings, but allows grantees the option to hold virtual online hearings.

**CARES Act Amendment CDBG-CV3):** The City of Stamford under the provision of the CARES Act held a 5-day public comment period from June 23, 2021 to June 28, 2021. The Plan could be downloaded and viewed from the City's website at: https://www.stamfordct.gov/community-development-office

#### **CARES Act Amendment (CDBG-CV Reallocation of Unused Funds):**

30-DAY PUBLIC COMMENT: The Substantial Amendment to the 2019 AAP will be available for review and comment from March 28, 2022 to April 27, 2022 via the City's Community Development website, <a href="https://www.stamfordct.gov/community-development-office">https://www.stamfordct.gov/community-development-office</a> and from 9:00am to 4:00pm, Monday-Friday, at the Stamford Community Development Office (when open to the public), 888 Washington Blvd. 7<sup>th</sup> Floor, Stamford, CT. Written comments on amendment should be submitted through the online form available at <a href="https://www.stamfordct.gov/community-development-office">https://www.stamfordct.gov/community-development-office</a> or to the Stamford Community Development Office at the above address.

PUBLIC HEARING: On Tuesday, April 26, 2022 at 6:30pm virtually, the Housing, Community Development and Social Services (HCD/SS) Committee of the Board of Representatives will hold a public meeting to accept verbal or written comments from citizens regarding the proposed amendment to the AAP. The meeting will be held remotely via Zoom online platform. For more Information: http://www.boardofreps.org/calendar.aspx

Annual Action Plan 2019

# **Citizen Participation Outreach**

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL
1	Public Meeting	Minorities  Persons with disabilities  Non-targeted/broad community  Residents of Public and Assisted Housing	29 proposals were submitted	Comments addressed the full spectrum of need experienced by LMI persons.	No comments were rejected or not accepted.	
2	Public Hearing	Persons with disabilities  Non-targeted/broad community  Residents of Public and Assisted Housing	27 people attended the hearing	Comments addressed the full spectrum of need experienced by LMI persons.	No comments were rejected or not accepted.	http://www.boardofreps.org/ hdc-ss-agendas-reports.aspx

Sort	Mode of	Target of	Summary of	Summary of	Summary of	URL
Order	Outreach	Outreach	response/attendance	comments received	comments	
					not	
					accepted	
		Minorities			and reasons	
		Williorities				
		Persons with				
		disabilities			No	
		disabilities			comments	
3	Newspaper	Non-targeted/broad	Zero	No comments were	were	
	Ad	community		received.	rejected or	
		,			not .	
		Residents of Public			accepted.	
		and Assisted				
		Housing				
		Minorities				
		Persons with			No	
		disabilities			comments	
	Public			No comments were	were	http://www.boardofreps.org/
4	Hearing	Non-targeted/broad	Zero	received.	rejected or	hdc-ss-agendas-reports.aspx
		community			not	The congestion of the control of the
					accepted.	
		Residents of Public				
		and Assisted				
		Housing				

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL
5	Internet Outreach	Minorities  Non-English Speaking - Specify other language: any via Google translate  Persons with disabilities  Non-targeted/broad community  Residents of Public and Assisted Housing	No comments were received.	No comments were received.	No comments were rejected or not accepted.	www.stamfordct.gov
6	Public Comment Review Period	Non-targeted/broad community	The City of Stamford under the provision of the CARES Act held a 5-day public comment period from May 20, 2020 to May 27, 2020 for the CARES Act Amendment to the 2019 AAP. The Plan could be downloaded and viewed from the City website at: https://www.stamfordct.gov/community-development-office	No comments received	No comments were rejected or not accepted.	

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments	URL
			•		not accepted and reasons	
7	Public Hearing	Non-targeted/broad community	A virtual public hearing was held on June 15, 2020 to inform the public of the CARES Act amendment to the 2019 AAP. HUD provisions allow for the suspension of inperson public hearings, but allows grantees the option to hold virtual online hearings.	No comments received	No comments were rejected or not accepted.	
8	Public Comment Review Period	Non-targeted/broad community	CV3: The City of Stamford under the provision of the CARES Act held a 5-day public comment period from June 23, 2021 to June 28, 2021. The Plan could be downloaded and viewed from the City website at:  https://www.stamfordct.gov/community-development-officeComments could be made to the contact listed in the PR-05.	There were no comments made from the public.	All comments were accepted.	

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL
9	Public Comment Review Period	Non-targeted/broad community	The Substantial Amendment to the 2019 AAP will be available for review and comment from March 28, 2022 to April 27, 2022 via the City's Community Development website, <a href="https://www.stamfordct.gov/community-development-office">https://www.stamfordct.gov/community-development-office</a> and from 9:00am to 4:00pm, Monday-Friday, at the Stamford Community Development Office (when open to the public), 888 Washington Blvd. 7th Floor, Stamford, CT. Written comments on amendment should be submitted through the online form available at <a href="https://www.stamfordct.gov/community-development-office">https://www.stamfordct.gov/community-development-office</a> or to the Stamford Community Development Office at the above address.	All comments are accepted.	All comments are accepted.	https://www.stamfordct.gov/community-development-office

Sort	Mode of	Target of	Summary of	Summary of	Summary of	URL
Order	Outreach	Outreach	response/attendance	comments received	comments	
					not	
					accepted	
					and reasons	
			On Tuesday, April 26, 2022 at 6:30pm			
			virtually, the Housing, Community			
			Development and Social Services (HCD/SS)			
			Committee of the Board of Representatives		All	
10	Public	Non-targeted/broad	will hold a public meeting to accept verbal	All comments are	comments	http://www.boardofreps.org/
10	Hearing	community	or written comments from citizens	accepted.	are	calendar.aspx
			regarding the proposed amendment to the		accepted.	
			AAP. The meeting will be held remotely via			
			Zoom online platform. More Information:			
			http://www.boardofreps.org/calendar.aspx			

Table 4 – Citizen Participation Outreach

# **Expected Resources**

# **AP-15 Expected Resources – 91.220(c)(1,2)**

#### Introduction

The City of Stamford is expecting to receive HUD entitlement funds of \$903,194 in CDBG and \$392,561 in HOME funds for program year 2019. These funds are shown in the table below.

In addition to HUD federal entitlement funds, the City also expects to receive \$500,000 in Capital funds (HDF) available based on the annual capital budget. The Capital funds is a HOME match and well in excess of its required amount. Other funds are Commercial Building Permit fees collected in the amount of \$134,737 and fees paid by developers in lieu of constructing units on site as required by Zoning in the amount of \$100,000.

#### **CARES Act Amendment**

On March 27, 2020 the Federal Coronavirus Aid, Relief and Economic Security Act (CARES) was signed into law which included supplemental formula allocations to HUD's CPD programs, including CDBG-CV. The additional CDBG CARES Act funds allocated to the City of Stamford was \$574,820, with provisions that suspends the 15% cap on public services and allows HUD to waive further program requirements if necessary. The CARES Act funds will be identified in this plan as CDBG-CV.

**CARES Act Amendment (CDBG-CV3):** The CDBG-CV3 funding allocated to the City of Stamford is \$1,205,027 and the Annual Action Plan has been amended to reflect the additional CDBG-CV funding. Total funding from CDBG-CV1 and CDBG-CV3 is now \$1,779,847. Funds will be used towards vital public services that are tied to efforts that prevent, prepare for and respond to the coronavirus (COVID-19) pandemic.

Annual Action Plan 2019

# **Anticipated Resources**

Program	Source of	Uses of Funds	Expected Amount Available Year 1				Expected	Narrative Description	
	Funds		Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$	Amount Available Remainder of ConPlan \$		
CDBG	public -	Acquisition						For City/projects as approved by Board	
	federal	Admin and Planning						of Representatives during NOFA and	
		Economic						public hearing process. Funded entities	
		Development						leverage CDBG funds with private, state	
		Housing						and local funds to complete projects.	
		Public Improvements							
		Public Services	903,194	0	0	903,194	1,900,000		
HOME	public -	Acquisition						For housing development,	
	federal	Homebuyer assistance						rehabilitation, down payment	
		Homeowner rehab						assistance, and administration. Funded	
		Multifamily rental new						entities leverage HOME funds with	
		construction						private, state and local funds to	
		Multifamily rental						complete projects.	
		rehab							
		New construction for							
		ownership			_				
		TBRA	392,561	50,000	0	442,561	1,095,000		
Other	public -	Admin and Planning						The combined CARES Act Allocation for	
	federal	Public Services						CDBG-CV1 & CV3 is \$1,779,847.	
		Other	1,779,847	0	0	1,779,847	0		

Table 5 - Expected Resources – Priority Table

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

The City awards Community Development Block Grant (CDBG) funds to local organizations through a competitive process and recommends applicants provide matching funds. The City frequently works with developers to use HOME, HDF, IHZ and Linkage funds as necessary to complete any major project. Developers use HOME and CDBG to fill gaps in a major project financing, for example, new unit construction with LIHTC, monies. The advantage of designating units to remain affordable with HOME financing and rents provides developers some flexibility. The HOME program match requirement is satisfied with the use of Capital (HDF) funds. (Note - The City currently has a match well in excess of its required amount.)

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

The City donated a parcel of land to 72 Franklin LLC (a wholly-owned not-for-profit subsidiary of Inspirica, Inc.) to help facilitate the construction of 52 units of deeply affordable rental housing. Garden Homes is working with the City and Inspirica to develop deeply affordable housing on the eastern half of Stanley Court. Garden Homes and Inspirica have indicated they do not intend to seek HUD funds for the project.

#### Discussion

The only matching funds required for the DHUD funds requested are for the HOME Investment Partnerships Program. The City has exceeded the annual required match for these funds. Any additional match required under this Plan will be provided through City capital budget funds. The City did not budget a set aside this year for housing related purposes.

The City will attempt to leverage funds with its CDBG and HOME investments. HOME regulations have been revised such that more projects may be entirely HOME funded. This is because regulations now require all other project funds to be in place at the time of HOME commitment. This timing is difficult to assure with larger projects progressing through state funding rounds for LIHTC and CHAMP monies.

# **Annual Goals and Objectives**

# **AP-20 Annual Goals and Objectives**

# **Goals Summary Information**

Sort	Goal Name	Start	End	Category	Geographic	Needs Addressed	Funding	Goal Outcome Indicator
Order	Dublic Comices to	Year	Year	Us as alsos	Area	Dublic Comices for	CDDC	Dublic continues in the second
1	Public Services to	2015	2020	Homeless	Qualifying	Public Services for	CDBG:	Public service activities other
	Most Vulnerable			Non-Homeless	LMI Census	Very Low Income	\$195,692	than Low/Moderate Income
	Populations			Special Needs	Tracts		CDBG-CV:	Housing Benefit: 23973 Persons
				Non-Housing			\$1,480,542	Assisted
				Community				Homelessness Prevention: 100
				Development				Persons Assisted
2	Retain and/or	2015	2020	Affordable	Qualifying	Housing,	CDBG:	Rental units rehabilitated: 50
	Develop LMI			Housing	LMI Census	Moderate Income	\$394,199	Household Housing Unit
	Housing				Tracts	Housing, Very	HOME:	Direct Financial Assistance to
						Low Income	\$442,561	Homebuyers: 3 Households
								Assisted
3	Sustain Livable	2015	2020	Non-Housing	Qualifying	Public	CDBG:	Public Facility or Infrastructure
	Neighborhoods			Community	LMI Census	Improvements	\$313,303	Activities other than
				Development	Tracts		CDBG-CV:	Low/Moderate Income Housing
							\$299,305	Benefit: 1890 Persons Assisted

Table 6 - Goals Summary

# **Goal Descriptions**

1	Goal Name	Public Services to Most Vulnerable Populations		
	Goal Description	Projects are available to persons from all census tracts, but are focused on those which are LMI. Addresses where activities will be undertaken can be found in the Planned Activities section of the public service project in the AP-35.		
CARES Act Amendment (CV1 & CV3): An estimated additional 10,000 LMI persons will be assisted with acti prepare for and respond to the coronavirus				
	Substantial Amendment (Reallocation of CDBG-CV Funds): Reallocation of unused CV funds for public services homeless, youth, elderly, victims of domestic violence and other low income persons (\$219,432 of which is fo agreement costs for the Scofield Manor COVID public services expenses).			
2	Goal Name	Retain and/or Develop LMI Housing		
	Goal Description	Housing activities will include the provision of historic design services for CDBG/HOME funded projects, rehabilitation of heating system and cooler storage for NNI and Housing authority. Also rehab of 5-10 owner occupied units.		
3	Goal Name	Sustain Livable Neighborhoods		
	Goal Description	Public facility activities will address building and site improvements to homeless shelters, a child care center, a mental health facility and a facility for the disabled.		
		Substantial Amendment (Reallocation of CDBG-CV Funds): Reallocation of unused CV funds for improvements to facilities including a safe house, childcare center, rehab center, park, and sidewalks		

# **Projects**

## AP-35 Projects - 91.220(d)

#### Introduction

The projects selected for funding are consistent with the Consolidated Plan, and were presented by the community as critical. They have been approved by the City's Board of Representatives.

#### **CARES Act Amendment**

CDBG-CV funds will be allocated to create two CV-projects that will work to prevent, prepare for and respond to the coronavirus (COVID-19) pandemic: CV-Administration and CV-Public Services. CV projects are funded with CDBG-CV1 & CDBG-CV3.

#### **CARES Act Amendment (CDBG-CV Reallocation of Unused Funds):**

The City will make a Substantial Amendment to the 2019 AAP CARES Act Amendment and will reallocate \$1,229,027 in unspent CARES funds for the following purposes: \$900,472 for Public Services for the hungry, homeless, youth, elderly, victims of domestic violence and other low income persons (\$219,432 of which is for pre-agreement costs); \$270,055 for Public Improvements to facilities and infrastructure including a safe house, childcare center, rehab center, park, and sidewalks; and \$58,500 for CV-Grant Administration. All activities funded with CDBG-CV will prevent, prepare for and respond to the coronavirus (PPR). In addition, due to the reallocation of funds towards public improvement activities, a new CV project will be created: CV-Public Improvements.

#### **Projects**

#	Project Name
1	Public Services
2	Public Improvements
3	Housing
4	CDBG Administration
5	HOME Projects
6	CHDO HOME funds
7	HOME Administration
8	CV-Administration
9	CV-Public Services
10	CV-Public Improvements
11	CV-Pre-Agreement Costs (Scofield Manor Public Services)

**Table 7 - Project Information** 

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

The City's Board of Representatives emphasizes funding programs/projects that benefit the most vulnerable: homeless and those at risk of homelessness. Neighborhood organizations are funded to provide programs and services to improve the quality of life for low-moderate income residents.

# **AP-38 Project Summary**

# **Project Summary Information**

1	Project Name	Public Services
	Target Area	Qualifying LMI Census Tracts
	Goals Supported	Public Services to Most Vulnerable Populations
	Needs Addressed	Public Services for Very Low Income
	Funding	CDBG: \$135,479
	Description	Projects are available to persons from all census tracts, but are focused on those which are LMI. Addresses where activities will be undertaken can be found in the Planned Activities section.
	Target Date	6/30/2020
	Estimate the number and type of families that will benefit from the proposed activities	Over 13,000 LMI people are anticipated to benefit from the proposed activities.
	Location Description	Projects are available to persons from all census tracts, but are focused on those which are LMI. Addresses where activities will be undertaken can be found in the Planned Activities section.

	Planned Activities	<u>Kids in Crisis, Inc.:</u> (1 Salem St., Greenwich) Direct services counselor for Crisis Helpline - \$7,559
		Food Bank of Lower Fairfield County: (461 Glenbrook Rd.) Warehouse Manager for food bank serving 10,000+ Stamford households - \$16,983
		Pacific House, Inc.: (597 Pacific St.) Case manager for homeless program service 500+ homeless men and women - \$9,623
		Inspirica, Inc.: (8 Woodland Pl.) Planning coach to direct housing/support services to 25 homeless women - \$9,623
		Child Guidance Center of Southern CT: (103 West Broad St.) Clinician to provide mental health services to 60 low income youth - \$7,624
		Community Health Center, Inc.: (141 Franklin St.) Dental services for 25 low income elderly -\$4,700
		SilverSource, Inc.: (2009 Summer St.) Assist 40 low income elderly with prescription drug cost - \$10,324
		<u>Sexual Assault Crisis \$ Education Center:</u> (733 Summer St.) Crisis counseling and advocacy services to victims of sexual violence - \$4,372
		Boys and Girls Club of Stamford, Inc.: (347 Stillwater Ave.) Counselor for
		6 week day program for 400 Stamford children- \$19,623
		<u>Domus Kinds, Inc.:</u> (83 Lockwood Ave.) Direct services counselor for Crisis Helpline - \$7,623
		Bartlett Arboretum Association Bartlett Arboretum & Garden
		<u>Camp</u> : Scholarship Summer Camp Program-\$6,702
		<u>Liberation Programs, Inc.:</u> (129 Glover St, Norwalk) Child supervisor and counselor - \$3,200
		Person to Person, Inc.: (1864 Post Rd., Darien) FT Case Manager and FT Site Manager serving over 1,500 Stamford families - \$14,643
		Stamford YMCA: Counselor for 6 week day-program for 400 Stamford children - \$3,700
		<u>Connecticut Institute for Refugees:</u> Staff for Immigrations legal services for survivors of domestic violence - \$4,700
		<u>Domestic Violence Crisis Center:</u> Bilingual Assistance in crisis center - \$4,700
2	Project Name	Public Improvements
	Target Area	Qualifying LMI Census Tracts
	Goals Supported	Sustain Livable Neighborhoods

	Needs Addressed	Public Improvements
	Funding	CDBG: \$253,090
	Description	Public facility activities will address building and site improvements to homeless shelters, a child care center, a mental health facility and a facility for the disabled.
	Target Date	6/30/2020
	Estimate the number and type of families that will benefit from the proposed activities	Over 1,700 LMI persons/families will benefit from the proposed activities.
	Location Description	Projects will target/benefit LMI populations; addresses where activities will be undertaken can be found in the Planned Activities section.
	Planned Activities	CLC of Fairfield County, Inc.: (64 Palmers Hill Rd.) Replace 2 sets of metal front entry doors at childcare center serving low income - \$50,000  Inspirica, Inc.: (8 Woodland Place) McKinney House - Sealing of roof and siding - \$50,000  ARI of CT: (125 FFLD Ave) Rehab of Offices including handicap ramp - \$60,000  Domus Kids, Inc.: (83 Lockwood Ave.) Renovate teaching kitchen - \$33,500  Boys and Girls Club of Stamford: Replace 2 HVAC systems at Yearwood Center - \$43,140  Abilis: (321 Glenbrook Ave.) Generator - \$16,450  Contingency: \$23,936 will be held in contingency for approved public improvement projects that require additional funds.
3	Project Name	Housing
	Target Area	Qualifying LMI Census Tracts
	Goals Supported	Retain and/or Develop LMI Housing
	Needs Addressed	Housing, Very Low Income Housing, Moderate Income
	Funding	CDBG: \$333,986

	Description	Housing activities will include the provision of historic design services for CDBG/HOME funded projects, rehabilitation of heating system and cooler storage for NNI and Housing authority. Also rehab of 5-10 owner occupied units.
	Target Date	6/30/2020
	Estimate the number and type of families that will benefit from the proposed activities	Rental units rehabilitated: 50 Household Housing Unit
	Location Description	Addresses can be found in the Planned Activities response.
	Planned Activities	NNI Bell Street LP: (Friendship House) Heating system replacement for senior housing \$200,000  Stamford Community Development: (Stamford, target areas/LMH households) Housing Development Program (50 units) - \$133,986
4	Project Name	CDBG Administration
	Target Area	Qualifying LMI Census Tracts
	Goals Supported	Public Services to Most Vulnerable Populations Retain and/or Develop LMI Housing Sustain Livable Neighborhoods
	Needs Addressed	Housing, Very Low Income Housing, Moderate Income Public Services for Very Low Income Public Improvements
	Funding	CDBG: \$180,639
	Description	Administration costs for CDBG, HOME, NSP and HUD programs.
	Target Date	6/30/2020
	Estimate the number and type of families that will benefit from the proposed activities	Over 30,000 LMI families will benefit from the proposed activity.
	<b>Location Description</b>	Administration of the City of Stamford CPD programs.
	Planned Activities	The Community Development Office will administer the City's CDBG, HOME, NSP and any other HUD programs for the 2019-2020 year - \$180,639
5	Project Name	HOME Projects

	Target Area	Qualifying LMI Census Tracts
	Goals Supported	Retain and/or Develop LMI Housing
	Needs Addressed	Housing, Very Low Income Housing, Moderate Income
	Funding	HOME: \$331,921
	Description	Funds will be used for rental development and rehabilitation, down payment assistance. Developments to be funded have not yet been designated. Applications from a NOFA for funding will be made early in the year.
	Target Date	6/30/2020
	Estimate the number and type of families that will benefit from the proposed activities	The City of Stamford HOME Policy and Procedures limit each unit to \$20,000 of HOME funds. Approximately 19 households will benefit.  Income limits are set by HUD for the HOME program.
	Location Description	Not yet designated.
	Planned Activities	Construction of new units or rehabilitation of units; down payment assistance.
6	Project Name	CHDO HOME funds
	Target Area	Qualifying LMI Census Tracts
	Goals Supported	Retain and/or Develop LMI Housing
	Needs Addressed	Housing, Very Low Income Housing, Moderate Income
	Funding	HOME: \$66,384
	Description	Funds reserved for CHDO housing development per regulation.
	Target Date	6/30/2020
	Estimate the number and type of families that will benefit from the proposed activities	Up to four households.
	Location Description	Not yet designated.
	Planned Activities	Housing development or renovation of HOME qualifying units by a CHDO. Existing projects that will be ongoing in the year include 26 Fairfield Ave., rehabilitation of units and 20B Fairfield Ave., potential new construction of units.

7	Project Name	HOME Administration
	Target Area	Qualifying LMI Census Tracts
	Goals Supported	Retain and/or Develop LMI Housing
	Needs Addressed	Housing, Very Low Income
	Funding	HOME: \$44,256
	Description	Staff and operating costs related to HOME funding.
	Target Date	6/30/2020
	Estimate the number and type of families that will benefit from the proposed activities	Approximately 20 households will benefit from HOME funds.
	Location Description	Census Tracts: 201, 214,215, 217, 218.02, 220, 221, 222, and 223. Note - if income eligible, HOME funds will be used to assist households outside these census tracts.
	Planned Activities	Administration of HOME and HOME CHDO project funds (ERR, agreements, NOFA, monitoring, etc.)
8	Project Name	CV-Administration
	Target Area	Qualifying LMI Census Tracts
	Goals Supported	Public Services to Most Vulnerable Populations Retain and/or Develop LMI Housing Sustain Livable Neighborhoods
	Needs Addressed	Housing, Very Low Income Housing, Moderate Income Public Services for Very Low Income Public Improvements
	Funding	CDBG-CV: \$58,500
	Description	Administration of the CDBG Cares Act Funds (CDBG-CV) in Stamford for projects that will work to prevent, prepare for and respond to the coronavirus (COVID-19) pandemic.
	Target Date	6/30/2023
	Estimate the number and type of families that will benefit from the proposed activities	N/A

	<b>Location Description</b>	Citywide and Qualifying LMI Census Tracts
	Planned Activities Administration of the CDBG Cares Act (CDBG-CV) funds	
9 Project Name CV-Public Services		CV-Public Services
	Target Area	Qualifying LMI Census Tracts
	Goals Supported	Public Services to Most Vulnerable Populations
	Needs Addressed	Public Services for Very Low Income
	<b>Funding</b> CDBG-CV: \$1,231,860	
	Description	Public service activities that will work to prevent, prepare for and respond to the coronavirus (COVID-19) pandemic.
<b>Target Date</b> 6/30/2023		6/30/2023
	Estimate the number and type of families that will benefit from the proposed activities	Over 10,000 LMI people are anticipated to benefit from the proposed activities.
	<b>Location Description</b>	Citywide and Qualifying LMI Census Tracts

		<u>,                                      </u>		
	Planned Activities	Public service activities that will work to prevent, prepare for and respond to the coronavirus (COVID-19) pandemic.		
		Prior allocated activities are:		
		Boys & Girls Club-Child Care Summer Camp: \$167,820		
		Domus for Kids Inc. Summer Camp: \$383,000		
		Planned activities with reallocated funds:		
		SilverSource, Elderly Medical Expense Program: \$23,000		
		SilverSource, Elderly Food & Nutrition Program: \$37,000		
		Housing Collective, Supportive Homelessness Program: \$70,000		
		Saint Joseph Parenting Center, Child Abuse Prevention: \$20,000		
		City of Stamford, Early Childhood Support Childcare Assistance: \$100,000		
		Liberation Program, West Side Behavioral Health Initiative: \$10,000		
		Women's Mentoring Network, E to the 4th Power: \$24,000		
		Wheel it Forward, Medical Equipment Assistance: \$20,000		
		United Way, Enrichment Fund for Children: \$29,000		
		New Covenant Center, Reducing Food Insecurity Program: \$81,627		
		Women Business Development Council, Equity Grant Program: \$65,000		
		YMCA, After School Program: \$151,413		
		Domestic Violence Crisis Center, Youth & Family Counseling: \$50,000		
10	Project Name	CV-Public Improvements		
	Target Area	Qualifying LMI Census Tracts		
	<b>Goals Supported</b>	Sustain Livable Neighborhoods		
	Needs Addressed	Public Improvements		
	Funding	CDBG-CV: \$270,055		
	Description	The City has reallocated CDBG-CV funds towards public Improvements to facilities and infrastructure including a safe house, childcare center, rehab center, park, and sidewalks. Public improvement activities will work to prevent, prepare for and respond to the coronavirus (COVID-19) pandemic.		
	Target Date	6/30/2023		

	Estimate the number and type of families that will benefit from the proposed activities	Over 1,700 LMI persons/families will benefit from the proposed activities.
	<b>Location Description</b>	Citywide and Qualifying LMI Census Tracts
	Planned Activities	Public Improvement activities that will work to prevent, prepare for and respond to the coronavirus (COVID-19) pandemic.
		Boys & Girls Club of Stamford, COVID Mitigation: \$50,000
		Boys & Girls Club of Stamford, Roof Top HVAC Replacement: \$20,055
		Jackie Robinson Park of Fame, Beautification Project: \$15,000
		City of Stamford, West Side Traffic Calming & Pedestrian Project: \$75,000
		Domestic Violence Crisis Center, Roof Repair & Basement Waterproofing: \$90,000
		Rowan Center, Long Term Therapy Facility: \$20,000
Project Name CV-Pre-Agreement Costs (Scofield Manor Public Services)		CV-Pre-Agreement Costs (Scofield Manor Public Services)
	Target Area	Qualifying LMI Census Tracts
Goals Supported Public Services to Most Vulnerable Population		Public Services to Most Vulnerable Populations
Needs Addressed Public Services for Very Low Income		Public Services for Very Low Income
	Funding	CDBG-CV: \$219,432
	Description	The City is providing support for the Stamford Elderly Housing Corp. Stamford Scofield Manor COVID Expenses. This project is a reimbursement of pre-arrangement costs associated with public services provided to prevent, prepare for and respond to the COVID-19.
	Target Date	6/30/2023
	Estimate the number and type of families that will benefit from the proposed activities	Public service activities other than Low/Moderate Income Housing Benefit: 50 Persons Assisted
	<b>Location Description</b>	Citywide eligible

Planned Activities	Pre-arrangement costs:
	Stamford Elderly Housing Corp., Stamford Scofield Manor COVID
	Expenses such as increased staffing to respond to the pandemic, PPE
	equipment distribution, virus management and control, medical and
	safety precautions, enhanced disinfection services and testing: \$219,432

## AP-50 Geographic Distribution – 91.220(f)

# Description of the geographic areas of the entitlement (including areas of low-income and minority concentration) where assistance will be directed

Assistance is directed to the areas that are known to hold Stamford's highest concentration of low-income and minority/ethnic groups. Funds will be directed to the five neighborhoods described as the target area in the City's Consolidated Plan. These five neighborhoods, covering nine census tracts, show concentrations of low income residents in excess of 51% of the population of the Census Tract or Block Group. The neighborhoods are locally known as the Westside, South End, Waterside, Eastside and Downtown (residential only).

As CDBG funds continue to dwindle, these tracts will remain as in previous years to maximize impact of continued investments: 201, 214, 215, , 217, 218.02, 220, , 221, 222, and 223. Exact location of CDBG funded activities are determined through the CDBG budget development process, in which the providers of services/housing/community development activities bring their projects to the City requesting funding.

## **Geographic Distribution**

Target Area	Percentage of Funds
Qualifying LMI Census Tracts	

**Table 8 - Geographic Distribution** 

### Rationale for the priorities for allocating investments geographically

The City has historically adopted this approach and believes that it maximizes the benefit to the CDBG eligible population.

#### Discussion

The latest census data was evaluated, as was data provided by HUD indicating areas with income eligible populations. Data provided through mapping/data function in IDIS differed somewhat from data provided at the HUD Exchange site. As CDBG awards have dwindled, funds will continue to be directed to areas that had previously benefitted from CDBG funds. Future allocations will build upon previous impact/benefits of CDBG activity.

# **Affordable Housing**

## AP-55 Affordable Housing - 91.220(g)

### Introduction

CDBG funds are used to provide safe, sanitary, decent housing for low- and moderate-income persons. The City builds relationships between the public and private sector, including for-profit and not-for-profit organizations, resulting in the creation and preservation of affordable housing. In the coming year CDBG funds will be used to rehabilitate an estimated 70 units of low income housing. YR45 HOME funds could support a minimum of 13 units and will be used to rehabilitate or construct housing for low income persons.

One Year Goals for the Number of Households to be Supported	
Homeless	0
Non-Homeless	70
Special-Needs	0
Total	70

Table 9 - One Year Goals for Affordable Housing by Support Requirement

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

Table 10 - One Year Goals for Affordable Housing by Support Type

### Discussion

Assistance provided to the homeless is counted in homeless persons. Inspirica, Inc. women's shelter provides assistance to homeless families, but in a dorm setting and reports beneficiaries as persons.

## **AP-60 Public Housing – 91.220(h)**

#### Introduction

The Housing Authority of the City of Stamford, dba Charter Oak Communities (COC), successfully rebranded itself and is a model agency for redevelopment and community creation. COC receives federal funds from the U.S. Department of HUD and maintains its own staff. COC has an ambitious plan to undertake initiatives in areas such as public housing revitalization, communal urban agriculture, early childhood education, job/small business development, infrastructure improvements, community building and improved access to health care in partnership with Family Centers, the Boys & Girls Club, Stamford Hospital, the West Side Neighborhood Revitalization Zone, the City of Stamford, and Community Health Centers. Many of these programs target the Vita Health and Wellness District (West Side/Census Tracts 214 and 215).

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

The Housing Authority of the City of Stamford, dba Charter Oak Communities (COC), successfully rebranded itself and is a model agency for redevelopment and community creation. COC receives federal funds from the U.S. Department of HUD and maintains its own staff. COC has an ambitious plan to undertake initiatives in areas such as public housing revitalization, communal urban agriculture, early childhood education, job/small business development, infrastructure improvements, community building and improved access to health care in partnership with Family Centers, the Boys & Girls Club, Stamford Hospital, the West Side Neighborhood Revitalization Zone, Fairgate Farm, the City of Stamford, Optimus and Community Health Centers. Many of these programs target the Vita Health and Wellness District (West Side/Census Tracts 214 and 215).

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

COC will continue to address the need for tenants to increase income through education, counseling and job training. COC will continue its efforts to assure that tenants participate in a housing self-sufficiency program and to focus on household based economic development. COC staff will be trained on their role in Section 504, Limited English Proficiency, and fair housing guidelines. COC will seek to enhance rent billing and collection activities to ensure they are accomplished in the most effective and cost efficient way. The COC website will be replaced and the records retention policy implementation is ongoing (digital image storage and archiving of centralized program participant files.) Procurement will be reviewed with the goal of adopting an e-procurement (online) approach. The City will provide local capital funds (HDF - Housing Development Funds) and a loan from the Commercial Linkage fund for the construction of affordable units in a project known as Park 215 located at 215 Stillwater Ave. Linkage funds may also be used for the redevelopment of Lawnhill Terrace 3 - 52 units (25% - 60% AMI).

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

Beginning with its 2000 HOPE VI grant, COC has provided avenues for tenants to transition to home ownership. This has continued through redevelopment of the Fairfield Court units to Fairgate. COC established building councils for each of its developments. These councils review proposed funding of projects that impact their buildings. They were vital in several building renovation projects which involved temporary and permanent relocation of tenants. Now these councils are used as sounding boards for the development of requests for uses of COC capital funds and refinancing. COC will seek to develop a plan to create an endowment for supportive service programs administered within the various affordable housing programs. Resident-led initiatives including public housing resident-to-resident community service programs have and will continue to engage residents in activities which improve the quality of life for all residents. Residents become "stakeholders" and participate in public housing revitalization, from planning through operations which strengthens the growth and development of the community.

#### Discussion

The City has undertaken a number of studies in the past years which focus on the Vita Health and Wellness area - specifically a West Side Traffic Study and a Stillwater Corridor Master Plan - looking at roadways, complete streets, walking paths, bikeability, intersections, traffic calming, safety, lighting, beautification and how to improve connections to downtown and the intermodal transit facility and local recreational facilities. Over the coming years as the recommendations of the various plans are implemented the foundation laid by COC will position the properties in its portfolio as a model for redevelopment.

# AP-65 Homeless and Other Special Needs Activities – 91.220(i) Introduction

The City of Stamford has long participated in the area Continuum of Care by having City staff serve on its committees and Executive Board. With the merger of neighboring CoCs and the creation of the Fairfield County CoC, also known as Opening Doors Fairfield County (ODFC), the City remains involved and maintains a seat on the Coordinating Committee. ODFC strives to integrate resources serving a homeless/sheltered community that moves up and down the I-95 corridor. The City has actively supported homeless/special populations housing with HOME funds and CDBG funds. HOME funds have helped create new transitional housing units, and CDBG supports day service programs to homeless, life coaching for women and families that are homeless, and improvements to shelter facilities.

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

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

The City supports the specialists in homelessness, (Inspirica, Inc., Pacific House, Inc., ODFC) in their efforts to conduct annual homeless counts, and especially to establish a "one point" universal intake for homeless, which would assess needs and begin the shelter and counselor/resource referral process. CDBG funds will support a Day Drop In program for the homeless, in addition to a life planning coach for the homeless at Inspirica. Funds are also provided to support the mental health needs of homeless youth.

### Addressing the emergency shelter and transitional housing needs of homeless persons

The City works closely with Stamford's shelters to assure their buildings are maintained and improved to meet the needs of the sheltered, and that transitional housing opportunities are available. An example of this would be a roof replacement for Inspirica's women and family shelter. Previous HOME awards assisted construction of new transitional units (Fairfield Commons, 38 Ann St., 23 Spruce St.).

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

The City has assisted in creation and renovation of the transitional housing units critical to offering a stable housing opportunity to those who are homeless while providing counseling for development of

skills necessary to obtain permanent housing and maintain continued occupancy of that housing. The City, through HOME and its Zoning has created Below Market Rate housing which provides options for an individual or family seeking permanent housing in a high cost housing market. The City has supported applications by the ODFC/CoC for rapid rehousing funds. City CDBG funds public services counseling programs which work with those in danger of homelessness and the homeless in finding suitable housing alternatives. Kids in Crisis and Child Guidance Center funded programs address the mental health of homeless youth.

Helping low-income individuals and families avoid becoming homeless, especially extremely low-income individuals and families and those who are: being discharged from publicly funded institutions and systems of care (such as health care facilities, mental health facilities, foster care and other youth facilities, and corrections programs and institutions); or, receiving assistance from public or private agencies that address housing, health, social services, employment, education, or youth needs.

In a high housing cost area, households and individuals facing a loss of income still need to "make the rent." The services funded through CDBG, like the Food Bank and Senior Prescription Drug Program, assist these families in stretching their resources. There is also the need to increase the number of affordable units, which is done with HOME participation in the creation of affordable housing units. Getting and keeping employment is addressed through personal counseling and job skills training at our shelter facilities. Community Business Development Organizations assist in job creation at the local, neighborhood level. For those impacted by domestic violence, counseling and emergency assistance/shelter is provided by support of the Domestic Violence and Safe House Advocacy. Agreements between DMHAS and Correction/Court facilities ensure shelters are informed of institutional discharge so that people don't just "hit the street."

#### Discussion

As CDBG and HOME fund awards become smaller, the City of Stamford is committed to funding services and projects that meet the needs of the most vulnerable - the homeless, children needing mental health services and protection, families and children that need housing, and agencies that work with these vulnerable populations.

## AP-75 Barriers to affordable housing - 91.220(j)

#### Introduction:

The City's latest update to its Impediments to Fair Housing Analysis and Plan indicated the following actions should be taken to overcome impediments:

- Increase home ownership opportunities for low-moderate income buyers;
- Improve quality and number of affordable rental units to provide choice for low-moderate income renters;
- Improve access to housing opportunities for low-moderate income people.

Barriers cited above included the funds needed to create and subsidize deeply affordable rental housing, and income/rent limits used by federal programs in a high cost housing area. Access to credit for families/individuals disproportionately affected by housing problems needs to be addressed as well.

Actions it planned to remove or ameliorate the negative effects of public policies that serve as barriers to affordable housing such as land use controls, tax policies affecting land, zoning ordinances, building codes, fees and charges, growth limitations, and policies affecting the return on residential investment

The City will use the HOME down payment program to provide financing to low income tenants to become homeowners. The program allows a low-moderate income borrower to purchase a unit they can afford anywhere within Stamford. More importantly, in the Stamford housing market, any unit held for a period of time has historically gained value. A family assisted with a down payment loan is often on the way to building wealth through equity that will enable even greater housing choice with their next purchase. HOME funds will also be used to keep units affordable and safe through rehabilitation and new construction. Funds are made available to private property owners and non-profit developers. The City is committed to affirmatively furthering fair housing, including making referrals to counseling agencies to ensure that applicate for assistance will also be successful in obtaining conventional loans. The City is willing to engage Realtors and banks to stress the need to provide fair and equal access to conventional financing. The City will continue to work with LIHTC projects that by definition provide housing to very low income persons. For example, HOME funds have recently been used in a transit oriented affordable housing rental property. Meanwhile, we will continue to discuss with HUD the limits provided for maximum purchase price/housing value under HOME in a high cost area. The City will periodically review the Inclusionary Housing Zoning regulation to encourage the creation of housing accessible to individuals and families at a lower income level. During 2018-2019 numerous meetings were held to review the regulation.

## **Discussion:**

The City continues to develop its own source of subsidy for affordable units, primarily through the Zoning regulation and the Commercial Linkage programs. However, as written, rents for units developed or assisted cannot be considered "deeply affordable." The regulation undergoes periodic updates. The need for a review and opportunity to incentivize the creation of "deeply affordable" units can be considered at that time. During the past year the BOR HCD/SS committee has held a series of meetings with members of the Land Use Bureau and Zoning Board Members to better understand the modifications that could be made to the Zoning regulation

## **AP-85 Other Actions – 91.220(k)**

#### Introduction:

The Community Development Office of the City of Stamford continues to be responsible for all CDBG and HOME funded activities. The City, operating within the guidelines for the HOME program set by its Board of Representatives, addresses the needs of the elderly and low-income persons who face severe housing problems. The City maintains relationships with its non-profit housing providers and service agencies to help tenants be successful at keeping their homes.

### Actions planned to address obstacles to meeting underserved needs

The main obstacle to meeting underserved needs is the continued reduction of available funds. The Community Development Office provides data and information about funding opportunities to local community agencies to help them secure other public and private sources of funds. We have seen a need to among income qualified elderly homeowners who are counseled on options for financing necessary home repairs, should they wish to remain in place. If properties are 1-4 units, a HOME homeowner rehabilitation loan will be explored. The City has an "open, rolling" application for this type of assistance. The maximum available per unit is \$20,000, however, repairs in these units often exceed the amount of HOME funds available.

### Actions planned to foster and maintain affordable housing

The City will continue to work with Charter Oak Communities as it renews its oldest developments. City Capital and Linkage funds are often provided. Applications for CDBG assistance with capital improvements at affordable elderly housing sites are considered favorably. CDBG and HOME funds are provided to maintain the stock of affordable housing. Specifically, funds will be awarded to NHS/NNI Mission Taylor, LLC (Madison Smith Apartments/Belltown Manor) for to renovate areas of low income housing. The City meets regularly with Charter Oak Communities, New Neighborhoods, Inc., Mutual Housing Association, Neighborhood Housing Services, Pacific House and Inspirica to assess the needs to maintain affordable housing. The Housing, Community Development and Social Services Committee of the Board of Representatives will continue to review the City's Inclusionary Housing Zoning Regulation to identify text changes that could encourage the development of a wider range of affordable housing options.

#### Actions planned to reduce lead-based paint hazards

Program is enhanced by the services available through its own municipal departments and via its linkages with various community agencies and programs. Using a coordinated system reciprocal referrals and information sharing with Building, Fire, Social Services and Zoning/Land-use, Stamford has built a community network able to address housing related needs. The Health Department services include prenatal and well child care, school and public health nursing, and the Women, Infant, and

Children (WIC) nutrition program. As part of the child case management the Environmental Inspections Division confers with pediatricians, clinics and human service agencies to track the progress of each child with lead poisoning. The City of Stamford Health Department has knowledgeable staff that can assist with any questions regarding lead. The Health Department Laboratory Division provides finger screening on Mondays and Wednesdays. The Health Department is also responsible for investigating cases of lead poisoned children six years of age and younger with lead levels 10ug/dl or greater. The investigation entails an interview with the family, visual inspection of the premises, and paint chip, soil, and/or dust samples obtained for analysis. If the results indicate lead is present in the home, the owner will be responsible for abating the lead using a certified lead abatement contractor to remove the lead to assure proper removal and clean-up. The local health department sends a reminder test letter to parents/guardians for capillary results 5-9 µg/ dl. The level of concern has now been lowered from 10 μg/dl to 5 μg/dl. The new protocol went into effect on July 1, 2013. Any CDBG and HOME funded projects (residential) in pre-1978 structures are tested for lead-based paint hazards. If lead is present the sub-recipient must ensure that lead is abated in accordance with the regulations of the Environmental Protection Agency and in compliance with the Residential Lead Based Paint Hazard Reduction Act of 1992 (Title X) and subsequent changes.

## Actions planned to reduce the number of poverty-level families

Pacific House, Inc. is awarded funding to assist poverty-level individuals acquire the skills they need to expand their employment opportunities. Inspirica is funded to offer families access to programs to develop skills to rise from poverty. A program to help immigrants obtain the necessary documents to establish them as legal workers is also funded with the intention of empowering and educating immigrants to ensure they are not abused and have the skills to seek employment. Continued counseling and training of those with low income who reside in Charter Oak Communities associated developments will assist these families in increasing their income.

## Actions planned to develop institutional structure

The City partners with non-profit and other public agencies to implement the proposed community development plan. The City evaluates each activity, and the agencies and organizations, to assess the strengths and gaps in the delivery system. ODFC is working to create a more efficient way of dealing with the requirements that have grown up around the McKinney programs that fund the homeless shelter associated organizations. The City works with ODFC, PH and Inspirica to achieve a single point of entry into the homeless referral system. The City will continue to work to restructure the Community Development Office. The Community Development Office has a good working relationship with the Social Services Department and Health Department. The HCD/SS Committee will continue to request presentations from Land Use and Zoning as we seek to modify local Zoning to encourage the development of "deeply affordable" housing.

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

As the emphasis on housing the homeless has increased, there has been a natural growth of cooperation between public and private operators of affordable housing to create workable support/counseling for those obtaining transitional and permanent housing. The City supports these efforts, and urges those with newly funded HOME projects to consider establishing relationships with agencies such as Laurel House to assist tenants to become successful in their new housing. COC has a vibrant partnership with Family Centers, Inc. to connect residents with social services. The City will continue to work with COC on the Vita Health and Wellness district.

# **Program Specific Requirements**

# AP-90 Program Specific Requirements – 91.220(I)(1,2,4)

# Community Development Block Grant Program (CDBG) Reference 24 CFR 91.220(I)(1)

Projects planned with all CDBG funds expected to be available during the year are identified in the Projects Table. The following identifies program income that is available for use that is included in projects to be carried out.

1. The total amount of program income that will have been received before the start of the nex	xt
program year and that has not yet been reprogrammed	0
2. The amount of proceeds from section 108 loan guarantees that will be used during the year	to
address the priority needs and specific objectives identified in the grantee's strategic plan.	0
3. The amount of surplus funds from urban renewal settlements	0
4. The amount of any grant funds returned to the line of credit for which the planned use has r	not
been included in a prior statement or plan	0
5. The amount of income from float-funded activities	0
Total Program Income:	0
Other CDBG Requirements	
1. The amount of urgent need activities	0
2. The estimated percentage of CDBG funds that will be used for activities that benefit	
persons of low and moderate income. Overall Benefit - A consecutive period of one,	
two or three years may be used to determine that a minimum overall benefit of 70%	
of CDBG funds is used to benefit persons of low and moderate income. Specify the	
years covered that include this Annual Action Plan.	100.00%

# HOME Investment Partnership Program (HOME) Reference 24 CFR 91.220(I)(2)

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

The City will not be using other forms of investment described in 92.205, for example, loan guarantee, refinance or interest subsidies. All assistance to homebuyers or developers are in the form of secured mortgage loans, with deferred payment. No Tenant Based Rental Assistance will occur.

2. A description of the guidelines that will be used for resale or recapture of HOME funds when used for homebuyer activities as required in 92.254, is as follows:

Recapture/Resale Issues.

The HOME Down payment Assistance Program provides up to a \$20,000 deferred payment loan at zero percent which is payable upon resale or in 30 years, whichever occurs first. The down payment loan is always a direct subsidy enabling the homebuyer to purchase the property, and the loan is subject to "recapture", that is repayment in the event of sale or if the buyer does not use the unit as his/her principal residence. When recaptured, the entire loan must be repaid.

The City of Stamford requires that participants in the HOME down payment program execute mortgage deeds that reflect the above: they require HOME units to be the owner's principal residence for the life of the loan. In addition, the HOME Loan Note and Mortgage require that should they sell the unit, the HOME funds are recaptured via repayment of the loan.

If a down payment loan recipient sells his/her home

- For less than what is owed to all lenders, then the balance of the down payment loan that cannot be met with any sale proceeds is forgiven.
- For more than what is owed to all lenders, then the down payment loan must be paid in full from net proceeds.

Since the HOME loans must be repaid, there is no requirement for resale restrictions. The HUD maximum allowable purchase/home value for existing units now in effect is affecting this program. At \$314,000 for a single unit, the selection of units is poor. Analysis of real estate transactions recorded for the period 10/2015 to 10/2016 indicates only 23% of all transactions were for a sale price of \$313,000 or less.

In 2010 – 11, the City instituted underwriting standards that require HOME down payment loan recipients to meet a minimum requirement for their housing cost to income ratio.

To the extent possible, HOME down payment loans may be used on units purchased through the City's Neighborhood Stabilization Program (NSP). The NSP program shares the goal of creating affordable housing units, by acquiring, rehabilitating and reselling eligible properties to income qualified persons. HOME projects, existing and new, will be monitored for compliance regarding income, rents, and condition as described in the City's Strategic Plan.

The City will not use forms of investment other than those described in 92.205.

For information regarding affirmative marketing and minority outreach, see this Action Plan, Barriers to Affordable Housing section.

HOME projects, existing and new, will be monitored for compliance regarding income, rents, and condition as described in the City's Strategic Plan.

3. A description of the guidelines for resale or recapture that ensures the affordability of units acquired with HOME funds? See 24 CFR 92.254(a)(4) are as follows:

The Stamford Community Development Office received HUD approval of its form of note and mortgage for a HOME Down payment Loan Program. These documents contain the required recapture provision in event of sale of the unit, or in event of several instances of default (for example, moving from the unit and renting it out). In recapture, the entire loan must be repaid. The Adopt-A-House Program worked with the City to draft the proposed documents which were approved by HUD in 1997. In the event of sale by foreclosure, the owner is required to repay HOME funds only to the extent that net proceeds permit. (Net proceeds are defined in HOME regulations as "the sales price minus superior loan repayment (other than HOME funds) and any closing costs." (92.254(a)(5)(ii)(A)) If voluntary short sale is proposed by the owner of a HOME assisted unit, the City may approve the short sale or may exercise its right of first refusal and arrange a purchase by a HOME qualified buyer at a market price. This will assure that the unit will remain affordable. Otherwise, with recapture of funds, money is used to make additional HOME qualifying "down payments".

4. Plans for using HOME funds to refinance existing debt secured by multifamily housing that is rehabilitated with HOME funds along with a description of the refinancing guidelines required that will be used under 24 CFR 92.206(b), are as follows:

This will not be done.