



# **PY 2022 Consolidated Annual Performance and Evaluation Report (CAPER)**

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## **CR-05 - Goals and Outcomes**

### **Progress the jurisdiction has made in carrying out its strategic plan and its action plan. 91.520(a)**

This could be an overview that includes major initiatives and highlights that were proposed and executed throughout the program year.

The City of Stamford's 5-Year Goals of the 2020-2024 ConPlan for the use of HUD CDBG and HOME funds continued to be carried out in PY 2022 (YR48). Annual CDBG funds were awarded in the amount of \$877,693, and the City expended \$571,784 in the program year. The City received \$493,472 in HOME funds, and these were allocated towards affordable housing projects but have not yet been spent. The City also had CDBG-CV funds that were awarded during the onset of the pandemic, and the City expended \$576,377 on activities that responded to LMI households impacted by the pandemic. The following activities were completed in the PY:

**Public Services:** The City assisted 541 LMI persons with vital public services in the program year. The majority of these services were to assist the elderly at River House Adult Day Care (404 persons), and with the Silversource Elderly Medical Program CV 48-1 (97 persons). Housing information was also provided for 40 LMI persons at the Woman's Housing Life Coach program. Public service programs provide for basic needs and services that help to offset costs and promote housing stability.

**Public Facilities and Infrastructure:** The City assisted 841 LMI persons with improvements to public facilities. Activities included improvements to facilities for persons with a disability and youth centers. Unfortunately, the City did not meet its goals for PY 2022, however this was mainly a result of activity accomplishment set-ups. The City anticipated to have activities that had a low/mod area benefit, however benefits were recorded by intake. The City will make adjustments in the future to capture accomplishments accordingly.

**Affordable Housing:** There were no affordable housing activities completed in PY 2022 for CDBG or HOME. The City is however working on two modernization rehab activities with the New Neighborhood Friendship House heating upgrades at their housing facility, and improvements to the cold storage walk-in unit at SHA's Scofield Manor housing facility. The City is also working with 16 LMI households on new homebuyer opportunities through the down payment assistance program. These activities will be reported in the next CAPER when they are completed.

### **CARES Act Accomplishments**

CDBG-CV funded activities are reported at the end of this section.

**Comparison of the proposed versus actual outcomes for each outcome measure submitted with the consolidated plan and explain, if applicable, why progress was not made toward meeting goals and objectives. 91.520(g)**

Categories, priority levels, funding sources and amounts, outcomes/objectives, goal outcome indicators, units of measure, targets, actual outcomes/outputs, and percentage completed for each of the grantee's program year goals.

Goal	Category	Source	Indicator	Unit of Measure	Expected Strategic Plan	Actual Strategic Plan	Percent Complete	Expected Program Year	Actual Program Year	Percent Complete
1A Expand & Improve Public Infrastructure	Non-Housing Community Development	CDBG	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	Persons Assisted	250000	0	0.00%	25000	0	0.00%
1B Improve Access to Public Facilities	Non-Housing Community Development	CDBG	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	Persons Assisted	250000	2464	0.99%	25000	841	3.36%
2A Increase Homeownership Opportunities	Affordable Housing	HOME	Homeowner Housing Added	Household Housing Unit	10	0	0.00%			
2A Increase Homeownership Opportunities	Affordable Housing	HOME	Direct Financial Assistance to Homebuyers	Households Assisted	15	0	0.00%	5	0	0.00%
2B Increase Affordable Rental Housing Opportunities	Affordable Housing	CDBG HOME	Rental units constructed	Household Housing Unit	10	11	110.00%			
2B Increase Affordable Rental Housing Opportunities	Affordable Housing	CDBG HOME	Rental units rehabilitated	Household Housing Unit	250	281	112.40%	72	0	0.00%

Goal	Category	Source	Indicator	Unit of Measure	Expected Strategic Plan	Actual Strategic Plan	Percent Complete	Expected Program Year	Actual Program Year	Percent Complete
2C Provide for Owner Occupied Housing Rehab	Affordable Housing	CDBG HOME	Rental units rehabilitated	Household Housing Unit	0	0	0.00%			
2C Provide for Owner Occupied Housing Rehab	Affordable Housing	CDBG HOME	Homeowner Housing Rehabilitated	Household Housing Unit	250	0	0.00%	20	0	0.00%
3A Provide Supportive Services for Special Needs	Non-Homeless Special Needs Non-Housing Community Development	CDBG	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	Persons Assisted	0	0	0.00%	0	0	0.00%
3A Provide Supportive Services for Special Needs	Non-Homeless Special Needs Non-Housing Community Dev	CDBG	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	250000	360458	144.19%	50000	501	1.02%
3A Provide Supportive Services for Special Needs	Non-Homeless Special Needs Non-Housing Community Dev	CDBG	Homeless Person Overnight Shelter	Persons Assisted	0	40	0.00%			
3A Provide Supportive Services for Special Needs	Non-Homeless Special Needs Non-Housing Community Dev	CDBG	Homelessness Prevention	Persons Assisted	500	768	153.60%	100	40	0.00%
4A Provide Financial Assistance New Expanding Busi	Non-Housing Community Development	CDBG	Businesses assisted	Businesses Assisted	50	0	0.00%			

Table 1 - Accomplishments – Program Year & Strategic Plan to

**Assess how the jurisdiction's use of funds, particularly CDBG, addresses the priorities and specific objectives identified in the plan, giving special attention to the highest priority activities identified.**

The City's use of funds addresses the priorities and objectives in the plan and supports programs and services that benefit the most vulnerable members of our community which include individuals experiencing homelessness, victims of domestic violence, the elderly and children of low income families. The provision of funds to benefit these populations is reflected in the priorities and activities identified in the CDBG program.

CDBG funds were used to assist with vital public services, and public facilities and infrastructure improvements. The City has also allocated CDBG towards affordable housing goals, and while these funds were not spent in the program year this still remains a priority and those funds have been reserved towards these goals.

Public services are primarily targeted towards LMI and special needs persons and assist them to avoid homelessness. For example, the medical program by Sliversource helps to offset basic health costs for the elderly, which might otherwise be used for housing costs. Improvements to public facilities help to increase the quality of life of residents.

HOME funds are used to create affordable housing opportunities and ensure the long-term viability of our existing stock of affordable housing. Unfortunately, at this time the HOME program has not yet restarted, however funds have been programmed towards housing rehab and homeowner assistance programs.

**PY 2022 Actual Goal Accomplishments against Proposed Goal Outcomes**

1A Expand & Improve Public Infrastructure: There was a goal for 25,000 LMI to be assisted, however the City did not have any public infrastructure activities as the City continued to focus on public facility improvements in the program year.

1B Improve Access to Public Facilities: There was a goal for 25,000 LMI to be assisted, however this goal outcome indicator was intended for a low/mod area benefit and the City reported actual LMI persons, therefore falling short of the estimated goal. The City may revise this goal in the future to capture actual LMI persons assisted.

2A Increase Homeownership Opportunities: There were no homeownership activities in the program year, but the City has restarted the downpayment assistance program. There were 16 LMI households assisted, however these were not reported in time for PY 2022 and will be

added to next year's CAPER accomplishments.

2B Increase Affordable Rental Housing Opportunities: There were no rental activities in the program year. The City is working to restart the HOME program and funding will be available again for rental housing opportunities. Prior accomplishments have fulfilled the goals in the Strategic Planning period.

2C Provide for Owner Occupied Housing Rehab: There were no owner-occupied rehab activities in the program year. The City will work to identify eligible homeowners and report accomplishments in future upcoming reports.

3A Provide Supportive Services for Special Needs: The City had a goal of 50,000 LMI persons served with public services, however these goals were not met in PY 2022. The City will continue to work off the success of past partnerships with nonprofit service and homeless service providers.

4A Provide Financial Assistance New Expanding Business: Unfortunately, the City was not able to complete any economic development activities in the program year. This remains a priority and the City will continue to work towards planned activities such as microenterprise assistance in the West Side Neighborhood.

#### **CARES Act Accomplishments**

The City completed one CV-Public Service activity in PY 2022. This program was the Silversource Elderly Medical Program CV which helped to provide medicine and PPE equipment for 97 seniors in Stamford. The City will continue to work on the established goals for the CDBG-CV program and will continue reporting these accomplishments in future CAPER reports.

## CR-10 - Racial and Ethnic composition of families assisted

Describe the families assisted (including the racial and ethnic status of families assisted).  
91.520(a)

	CDBG	HOME
White	714	0
Black or African American	620	0
Asian	29	0
American Indian or American Native	3	0
Native Hawaiian or Other Pacific Islander	7	0
<b>Total</b>	<b>1,373</b>	<b>0</b>
Hispanic	488	0
Not Hispanic	894	0

**Table 2 – Table of assistance to racial and ethnic populations by source of funds**

### Narrative

**Data Note:** Due to the limitations of the IDIS system reporting table, “other and multi-racial” persons were not counted in the race/ethnicity table above. As a result, the table above only shows 1,373 persons assisted, but the total was really 1,382 as 9 were “other and multi-racial” persons. Also, the table above only represents activities that were able to collect race/ethnicity data through an application/intake process and not by area-wide benefit, therefore total race/ethnicity numbers may not equal total persons served reported in this CAPER.

According to the 2017-2021 ACS, the population of Stamford was 134,820 persons and 59.3% of the City’s residents identified racially as white, with minority races being 12.9% black, and 8.5% Asian. “Some other” race were 10.4% and “Two or more” races were 8.5% of the population. All other races made up less than 1% of the population. Ethnically, 27.8% of the population in Stamford identified as Hispanic.

For persons assisted with the CDBG program, 51.7% were white and 44.9% were black. Asian persons assisted through CDBG activities were 2.1%, which is well below their population average in the City. Persons who identified as Hispanic were 35.3% of persons assisted through CDBG. With the exception of Asian persons, those assisted through CDBG were representative of the Citywide population.



## CR-15 - Resources and Investments 91.520(a)

### Identify the resources made available

Source of Funds	Source	Resources Made Available	Amount Expended During Program Year
CDBG	public - federal	877,693	571,784
HOME	public - federal	493,472	0

**Table 3 - Resources Made Available**

### Narrative

In PY 2022, the City had two sources of HUD CPD funds which were the CDBG and HOME grant programs. The table above details the resources made available as well as funds expended during the program year. While there were no HOME funds drawn or expended in PY 2022, the City has begun spending funds again on homeowner housing rehab activities in PY 2023. The cut-off date to report these funds in the CAPER is June 30, 2023 and therefore these HOME expenditures will be reported in the following CAPER report.

CDBG funds in the amount of \$877,693 were made available in the PY 2022 though the grant annual allocation and the City expended \$571,784 on public services, public facilities, housing rehab and admin of the program.

As mentioned above, no HOME funds were spent within PY 2022. HOME funds in the amount of \$493,472 were made available through the annual allocation. The City has already scheduled down payment assistance activities, and expenditures were made shortly after the program year ended. As this report only captures the funds spent within the program year (July 1, 2022 to June 30, 2023), these expenditures will be reported in next year's report.

### **CARES Act Funds**

The City received a total of \$1,779,847 in CDBG-CV grant funds as a result of the CARES Act signed into law in March of 2020, which was intended to help fund activities that would prevent, prepare for and respond to the coronavirus. In PY 2022, the City expended another \$576,376.87 in CDBG-CV funds towards vital public services and public facility improvements for LMI persons still impacted by the pandemic. As reported by the PR26 CDBG-CV Financial Summary Report, this brings the total expenditures for the program to \$1,246,292.00 and leaves a remaining balance of \$533,555.00 or 30% remaining. The PR02 CDBG-CV Activity List and the PR26 has been uploaded to the CR-00 to confirm.

**Identify the geographic distribution and location of investments**

Target Area	Planned Percentage of Allocation	Actual Percentage of Allocation	Narrative Description
Qualifying LMI Census Tracts	100	100	>51% LMI

**Table 4 – Identify the geographic distribution and location of investments****Narrative**

As per the CDBG program requirements, priority for funding of activities goes to those that directly serve our low-moderate income, and/or benefit the census tracts in which they are concentrated. The exact location of CDBG funded activities are determined through the CDBG budget development process as well as Low/Mod Block Group tract data, which housing and community service providers bring to the City by requesting funds for their projects.

Eligible tracts are provided by HUD's CDBG Low Mod Income Summary Data (LMISD), which indicate areas with income eligible populations of at least 51% low/mod income or more. The identified block group tracts within the jurisdiction that are considered low-moderate income can be found on the HUD Exchange website at: <https://www.hudexchange.info/programs/acs-low-mod-summary-data/>

## **Leveraging**

**Explain how federal funds leveraged additional resources (private, state and local funds), including a description of how matching requirements were satisfied, as well as how any publicly owned land or property located within the jurisdiction that were used to address the needs identified in the plan.**

CDBG awards are always a small portion of the total amount of funds required for any public service project. The City awards CDBG funds to local organizations through a competitive process and recommends applicants provide matching funds. Subrecipients may use CDBG funds to leverage a variety of local sources, which may include private donations, state and other local funds. In each application, agencies detail total project cost and identify sources of funds. Public Improvement and Housing projects typically require subrecipients to contribute some funding to complete the project.

### HOME Match

There were no HOME Match contributions in the program year. The City also did not draw or expend any HOME funds in the program year, therefore there was no HOME match liability. This is confirmed in the PR33 HOME Match Liability Report.

HOME awards are often a very small percentage of a much larger project; however, due to the requirement to have all secured funds in hand we are seeing more projects where HOME will be 100% of the project. The City has a recorded match from prior Federal fiscal years in excess of the required match contribution, shown in the following HOME Match table (\$9,191,772). In the case of HOME rehabilitation loans, the borrowers provide modest amounts of private capital to compete a project. The City's plan is to work with developers to use HOME, HDF, IHZ and Linkage funds as necessary to complete any major project.

### Publicly owned land or property used to address the needs identified in the plan

The City did not have any land or property that was used to address the needs in the plan in PY 2022.

### HOME Program Income

According to the PR-09, the City had \$89,587.73 in HOME program income on hand at the beginning of PY 2022. The City did not receive or expend any program income in PY 2022. There were also no HOME program income funds expended on TBRA activities. The final balance at the end of the program year was \$89,587.73.

### HOME MBE/WBE Contracts

As there were no HOME funds spent in PY 2022, and there were also no contracts awarded.

<b>Fiscal Year Summary – HOME Match</b>	
1. Excess match from prior Federal fiscal year	9,192,722
2. Match contributed during current Federal fiscal year	0
3 .Total match available for current Federal fiscal year (Line 1 plus Line 2)	9,192,722
4. Match liability for current Federal fiscal year	0
5. Excess match carried over to next Federal fiscal year (Line 3 minus Line 4)	9,192,722

**Table 5 – Fiscal Year Summary - HOME Match Report**

Match Contribution for the Federal Fiscal Year								
Project No. or Other ID	Date of Contribution	Cash (non-Federal sources)	Foregone Taxes, Fees, Charges	Appraised Land/Real Property	Required Infrastructure	Site Preparation, Construction Materials, Donated labor	Bond Financing	Total Match

Table 6 – Match Contribution for the Federal Fiscal Year

### HOME MBE/WBE report

Program Income – Enter the program amounts for the reporting period				
Balance on hand at begin-ning of reporting period \$	Amount received during reporting period \$	Total amount expended during reporting period \$	Amount expended for TBRA \$	Balance on hand at end of reporting period \$
89,588	0	0	0	89,588

Table 7 – Program Income

Minority Business Enterprises and Women Business Enterprises – Indicate the number and dollar value of contracts for HOME projects completed during the reporting period						
	Total	Minority Business Enterprises				White Non-Hispanic
		Alaskan Native or American Indian	Asian or Pacific Islander	Black Non-Hispanic	Hispanic	
Contracts						
Number	0	0	0	0	0	0
Dollar Amount	0	0	0	0	0	0
Sub-Contracts						
Number	0	0	0	0	0	0
Dollar Amount	0	0	0	0	0	0
	Total	Women Business Enterprises	Male			
Contracts						
Number	0	0	0			
Dollar Amount	0	0	0			
Sub-Contracts						
Number	0	0	0			
Dollar Amount	0	0	0			

**Table 8 - Minority Business and Women Business Enterprises**

<b>Minority Owners of Rental Property</b> – Indicate the number of HOME assisted rental property owners and the total amount of HOME funds in these rental properties assisted						
	<b>Total</b>	<b>Minority Property Owners</b>				<b>White Non-Hispanic</b>
		<b>Alaskan Native or American Indian</b>	<b>Asian or Pacific Islander</b>	<b>Black Non-Hispanic</b>	<b>Hispanic</b>	
Number	0	0	0	0	0	0
Dollar Amount	0	0	0	0	0	0

**Table 9 – Minority Owners of Rental Property**

<b>Relocation and Real Property Acquisition</b> – Indicate the number of persons displaced, the cost of relocation payments, the number of parcels acquired, and the cost of acquisition						
Parcels Acquired		0		0		
Businesses Displaced		0		0		
Nonprofit Organizations Displaced		0		0		
Households Temporarily Relocated, not Displaced		0		0		
Households Displaced	Total	Minority Property Enterprises				White Non-Hispanic
		Alaskan Native or American Indian	Asian or Pacific Islander	Black Non-Hispanic	Hispanic	
Number	0	0	0	0	0	0
Cost	0	0	0	0	0	0

**Table 10 – Relocation and Real Property Acquisition**

## CR-20 - Affordable Housing 91.520(b)

Evaluation of the jurisdiction's progress in providing affordable housing, including the number and types of families served, the number of extremely low-income, low-income, moderate-income, and middle-income persons served.

	One-Year Goal	Actual
Number of Homeless households to be provided affordable housing units	0	0
Number of Non-Homeless households to be provided affordable housing units	97	0
Number of Special-Needs households to be provided affordable housing units	0	0
<b>Total</b>	<b>97</b>	<b>0</b>

**Table 11 – Number of Households**

	One-Year Goal	Actual
Number of households supported through Rental Assistance	0	0
Number of households supported through The Production of New Units	5	0
Number of households supported through Rehab of Existing Units	92	0
Number of households supported through Acquisition of Existing Units	0	0
<b>Total</b>	<b>97</b>	<b>0</b>

**Table 12 – Number of Households Supported**

**Discuss the difference between goals and outcomes and problems encountered in meeting these goals.**

Unfortunately, there were no affordable housing activities completed in PY 2022 for CDBG or HOME. The City is currently working on public housing modernization activities which will help elderly residents at Scofield Manor and residents of Charter Oaks Communities. Once these activities are completed and benefits recorded, the City will report the households assisted.

The City has also recently restarted down payment assistance activities, however these were not completed by the time of this reporting. HOME accomplishments are only reported in the CAPER once they have been completed in HUD's IDIS reporting system and all related project expenditures have been made. There are currently 16 LMI households that have received this assistance that will be reported in the next CAPER report.



**Discuss how these outcomes will impact future annual action plans.**

While the City did not report any households assisted for affordable housing assistance in the program year, this is still a priority need for the City and it's LMI residents. The City is working to start affordable housing programs for owner-occupied households, and this will be a focus in upcoming program years. The City has already programmed funds to assist 16 LMI households with down payment assistance for new housing.

CHDO projects continue to be a challenge. The City is reviewing the \$20,000 per unit limit for assisted projects. Work is currently being planned with CHDO and NNI with rental rehab activities and the City anticipates to report these accomplishments in future CAPERS.

**Include the number of extremely low-income, low-income, and moderate-income persons served by each activity where information on income by family size is required to determine the eligibility of the activity.**

Number of Households Served	CDBG Actual	HOME Actual
Extremely Low-income	0	0
Low-income	0	0
Moderate-income	0	0
<b>Total</b>	<b>0</b>	<b>0</b>

**Table 13 – Number of Households Served**

**Narrative Information**

As mentioned above, there were no affordable housing activities completed in PY 2022 for CDBG or HOME. The City is currently working on public housing modernization activities which will help elderly residents at Scofield Manor. The City is also working with New Neighborhood Friendship House on their multi-family housing unit with heating upgrades. Once these activities are completed and benefits recorded, the City will report the households assisted. The City is also working on homebuyer opportunities for LMI households and has already programmed HOME funds to assist 16 LMI households with down payment assistance.

*Worst Case Needs*

Those with worst case needs are individuals or households at-risk of or experiencing homelessness, extremely low-income households, and special needs households. The City will continue to prioritize and work with partners that assist these groups.

The City is in the process of working with the housing authority to assist elderly residents at Scofield Manor with public housing modernization. The activity will involve replacing the walk-in cooler for cold food storage, and this will benefit all residents in the building.

The City did not specifically report any persons with a disability in affordable housing programs, however if a household with a disability is identified for assistance in one of the housing programs, the City will make all necessary accommodations within reason to meet the needs of the household.

## **CR-25 - Homeless and Other Special Needs 91.220(d, e); 91.320(d, e); 91.520(c)**

**Evaluate the jurisdiction's progress in meeting its specific objectives for reducing and ending homelessness through:**

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

The City of Stamford participates in the local Continuum of Care, Opening Doors Fairfield County (ODFC), to assist persons experiencing homelessness. As projects are presented to the City by CoC members, City representatives attempt to coordinate assistance as feasible from existing resources, which include Federal HUD funds. For example, funds were provided to Inspirica to provide mental health services for persons experiencing homelessness. Additionally, CDBG funds supported exterior fence replacement for a safe house serving victims of domestic violence.

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 the homeless, which would assess needs and begin the shelter and counselor/resource referral process. Funds were also provided to support public services such as the mental health needs of homeless youth.

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

The City works closely with shelters in Stamford to assure their buildings are maintained and improved to meet the needs of the sheltered persons and that transitional housing opportunities are available. In PY 2022 funds were allocated to Inspirica to improve one of its facilities that serves persons at-risk of or experiencing homelessness. Inspirica serves individuals and families who are homeless, facing housing insecurity, or are at risk of becoming homeless. Each night it houses approximately 475 people and each year it serves more than 3,000 people. Additionally, CDBG funds supported exterior fence replacement for a safe house serving victims of domestic violence.

### **Helping low-income individuals and families avoid becoming homeless, especially extremely low-income individuals and families and those who are: likely to become homeless after 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); and, receiving assistance from public or private agencies that address housing, health, social services, employment, education, or youth needs**

The City continues to make it a priority to help LMI individuals and families to avoid becoming homeless, especially those who are likely to become discharged from systems of care and are most at-risk of returning to homelessness. The City has assisted in the creation and rehab of 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 has also accepted and supported applications by the Continuum of Care members for funding.

The CDBG program funds public services, such as counseling programs, which work with those in danger of homelessness and the homeless in finding suitable housing alternatives. Inspirica Women's Housing Program provides emergency support services which are intended to help clients avoid homelessness. Kids in Crisis is a funded program that addresses the mental health of youth that may be at-risk of homelessness. Person to Person has a critical needs assistance program that offers assistance with food, clothing, diapers, infant layettes, housewares and emergency financial assistance. CDBG also funded programs which offered access to other food banks and medical services freeing up funds for rent.

In a high housing cost area, households and individuals facing a loss of income still need to "make the rent." There is also the need to increase or maintain the number of affordable units, which is done with HOME participation in the creation and preservation of affordable housing units.

Through the HOME program and Zoning Regulation Section 7.4, the City has created Below Market Rate Program, which is an inclusionary zoning program that provides options for an individual or family seeking permanent housing in a high-cost housing market. Funds provided as a fee-in-lieu of the on-site affordable housing requirements (typically at the 50% AMI level) have typically been used to develop deeply affordable housing to serve families seeking stable housing. To date the program has created over 1,000 units of deed restricted affordable housing.

**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 used CDBG funds to support mental health services for homeless persons at Inspirica. Other supportive services this agency provides include case management, employment training, housing placement other supportive services. Acquiring and keeping employment is addressed through personal counseling and job skills training at shelter facilities. The City has supported applications by ODFC for rapid rehousing funds. The City also funds public service counseling programs which work with those in danger of homelessness and the homeless in finding suitable housing alternatives. The Kids in Crisis Safe Haven for Kids program addresses the mental health of homeless youth and provides support services and a crisis hotline.

Other programs that ODFC, the Continuum of Care, offers to help homeless individuals and families

transition from homelessness to stable housing are listed below.

Community Care Teams (CCT) partner in improving the quality and access to care for the most vulnerable citizens. Providers identify gaps in services and identify solutions and resources for clients. Participants meet weekly, and include direct service providers from: shelters, community health clinics, housing authorities, substance abuse treatment facilities, behavioral health services, acute-care hospitals, and staff from municipal, state and federal governmental agencies.

The ODFC Rapid Rehousing (RRH) program provides financial assistance according to need and services needed to help individuals and families avoid returning to homelessness. The three components of RRH include assistance to finding housing and housing placement, rental assistance and case management. The CT Department of Housing funds the CT RRH Program for the Fairfield County CAN region. RRH rental assistance is also funded through HUD Continuum of Care and ESG programming. Veterans are also assisted with RRH programming through the U.S. Department of Veteran Affairs Supportive Services for Veteran Families Program (SSVF).

The ODFC Housing First Collaborative (HFC) program immediately moves homeless individuals from the streets or shelters into their own housing units and provides time-limited case management support. This evidence-based national best practice is founded on the principle that one's first and primary need is to obtain stable housing. HFC utilizes an adapted Critical Time Intervention (CTI) model for providing time-limited case management support.

The ODFC Permanent Supportive Housing (PSH) provides affordable housing and comprehensive case management services to clients who are at-risk of chronic homelessness. Clients live in affordable housing and receive case management services to ensure long-term housing stability.

## **CR-30 - Public Housing 91.220(h); 91.320(j)**

### **Actions taken to address the needs of public housing**

The City continues to work with the local housing authority Charter Oaks Communities (HACS) for the completion of rehab projects for its low-income housing developments. Assistance was provided to the housing authority for air conditioner replacement in the dining room of the Wormser Residence, congregate senior living facility.

Charter Oak Communities receives federal funds from HUD and maintains its own staff. Charter Oak Communities 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 and the greater West Side neighborhood (Census Tracts 214 and 215).

To meet the unique needs of public housing residents, Charter Oak Communities staff continue to be trained on their role in Section 504, Limited English Proficiency, and fair housing guidelines. The PHA will seek to enhance rent billing and collection activities to ensure they are accomplished in the most effective and cost-efficient way.

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

With its ongoing efforts, the PHA continues to assure that tenants participate in a housing self-sufficiency program and to focus on household based economic development. Charter Oak Communities continues to address the need for tenants to increase income through education, counseling and job training.

Charter Oak Communities has provided avenues for tenants to transition to home ownership since its 2000 HOPE VI grant. This has continued through redevelopment of the Fairfield Court units to Fairgate. Charter Oak Communities established building councils for each of its developments. These councils reviewed 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 PHA capital funds and refinancing. Charter Oak Communities 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.

### **Actions taken to provide assistance to troubled PHAs**

Charter Oak Communities is not designated as a “troubled PHA.”

## **CR-35 - Other Actions 91.220(j)-(k); 91.320(i)-(j)**

**Actions taken 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. 91.220 (j); 91.320 (i)**

The City is committed to affirmatively furthering fair housing, including making referrals to counseling agencies to ensure that applicants for assistance will be successful in obtaining conventional loans. The City works with realtors and banks to emphasize the need to provide fair and equal access to conventional financing. The City also works with LIHTC projects that provide housing to very low-income persons.

The City has an inclusionary housing zoning regulation to encourage the creation of housing accessible to individuals and families at lower income levels. Stamford's inclusionary zoning program requires a minimum share of new multifamily units to include permanently affordable rental units, mostly targeted at households earning 50% of AMI.

In 2021, Stamford developed a Housing Affordability Plan to evaluate conditions in Stamford currently and prioritize strategies for the future. The Housing Affordability Plan builds on existing practices to help the City evaluate how to plan for housing to meet a broader range of needs. The plan recommends strategies that the City should focus on to address existing barriers in the housing market and meet housing needs.

The City uses 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 applicants for assistance will also be successful in obtaining conventional loans. The City periodically reviews the Inclusionary Housing Zoning regulation to encourage the creation of housing accessible to individuals and families at lower income levels.

## **Actions taken to address obstacles to meeting underserved needs. 91.220(k); 91.320(j)**

The main obstacle in meeting underserved needs is the continued reduction of available funds. The Community Development Office funds programs that target the most vulnerable populations which have underserved needs. Community Development also provides information about funding opportunities to local community agencies to help them secure other public and private sources of funds. Funded programs include services for persons with a disability, the elderly, the homeless and victims of domestic



violence.

The City has typically provided housing rehab for LMI households in need of housing repairs. The City has had 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, or more commonly the value of the property exceeds the maximum HOME property value.

#### **Actions taken to reduce lead-based paint hazards. 91.220(k); 91.320(j)**

The City of Stamford has a great need for housing rehabilitation. The housing stock in the City is relatively old and as the housing units age there is an increasing need for rehabilitation to maintain a safe and secure housing stock. It is particularly important to assist low-income households that live in older homes.

City programs are 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 City's Department of Health includes services such as 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 Health & Inspections Division confers with pediatricians, clinics and human service agencies to track the progress of each child with lead poisoning.

The City of Stamford Department of Health has knowledgeable staff that can assist with any questions regarding lead. The Department of Health has a Laboratory Division that provides finger screening on select weekdays. The Department of Health 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 Department of Health 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. 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 taken to reduce the number of poverty-level families. 91.220(k); 91.320(j)**

The activities identified in this CAPER report worked directly to reduce the poverty-level for families in Stamford. For example, Inspirica was funded to offer mental health services to persons experiencing homelessness. Domus Kids received funding to engage high-risk youth who are on the path to—or are already engaged in—violence and/or gang activity and provide job skills training to youth transitioning

out of incarceration. Person to Person and New Covenant Center received funding to operate food programs for LMI households. 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 taken to develop institutional structure. 91.220(k); 91.320(j)**

The City worked with local non-profit and other public agencies to implement the community development plan. The City evaluated each activity, and the agencies and organizations, to assess the strengths and gaps in the service delivery system. The City works with ODFC (CoC), Pacific House and Inspirica to achieve a single point of entry into the homeless referral system. The Community Development Office communicates with the Social Services Department and Health Department and funding recommendations are reviewed by the Housing, Social Services, Community Development Committee of the Board of Representatives (HCD/SS) and the City Board of Representatives. The HCD/SS Committee held a number of meetings as to discuss housing and community development needs and how the programs can address these needs.

**Actions taken to enhance coordination between public and private housing and social service agencies. 91.220(k); 91.320(j)**

Each year the City funds community services providers that meet the highest needs identified in the City of Stamford. The City's Community Development Office is engaged with funded subrecipients and not only monitors progress of the program but also provides technical assistance when needed.

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 homeless service providers such as Inspirica and Pacific House to assist households to become successful in their new housing. Charter Oak Communities has a partnership with Family Centers, Inc. to connect residents with social services. The City continues to work with Charter Oak Communities on the Vita Health and Wellness district.

**Identify actions taken to overcome the effects of any impediments identified in the jurisdictions analysis of impediments to fair housing choice. 91.520(a)**

The City of Stamford completed an Analysis of Impediments to Fair Housing Choice (AI), which was originally developed in March of 2007 and has since been followed by subsequent 5-Year Housing Affordability Plans (HAP). The most recent HAP was approved in May of 2022. Together the AI and HAP identify the housing issues the City faces and provides recommendations as well as a strategy to overcome these issues.

The lack of quality affordable housing and a lack of access to housing caused by a growing population

were impediments identified in the AI. The AI also identified actions to take to overcome the effects of these impediments, which were:

- Increase home-ownership opportunities for LMI households.
- Improve the quality and number of affordable rental units to provide choice for LMI renters.
- Improve access to housing opportunities for LMI households.

The Housing Affordability Plan expands on the housing issues identified in the AI and redefines the three identified needs as rental affordability, housing supply, and homeownership access.

The following is a summary of housing issues and actions taken to address these issues.

### **Affordability and Supply**

The greatest barrier to affordable housing in Stamford is low incomes coupled with a lack of supply. The HAP reports a shortage of affordable rental units for LMI renters, and cost burden rose by 16% from 2010 to 2019, which is currently over 12,000 households. There is also a demand for more diverse housing types at all incomes. The lack of a diverse affordable housing supply impacts all income groups by driving up costs and limiting options which has a disproportionate effect on LMI households.

Actions Taken: The City is restarting a housing rehab program which will help to maintain the housing stock for LMI households. LMI households have difficulty affording the costs of housing rehab, and this assistance will help housing units from falling into conditions that may lead to homelessness.

The City recently helped the New Neighborhood's Friendship House multi-family development with heating improvements. This activity upgraded the heating system with new piping and improved the energy efficiency in the facility. There were 267 LMI households assisted with this activity.

### **Access**

In general, homeownership access is increasingly out of reach for LMI households. The HAP reports that cost burdened households have declined 23% from 2010 to 2019 as homeownership has declined, however there were still over 8,600 cost burdened owner-occupied households.

Housing access is also disproportionate among race/ethnicity groups in Stamford. The HAP reports that black and Hispanic households have lower median incomes than white households and have lower rates of homeownership. Black and Hispanic households are also not moving into new multi-family housing at the same rates as white and Asian households.

An analysis of 2020 HMDA data for the Bridgeport-Stamford-Norwalk MSA (All loan types, owner occupied purchase and refinance estimated at a median \$355,000) shows that black or African American households experience loan approvals at lower rates than white and Asian households (2020 HMDA via the Connecticut Housing Finance Authority). For example, approximately 54% of the black or African

American applicants had loans originated while white households had 65% and Asian households had 60% loans originated. Denial reasons most commonly cited were debt-to-income ratio, credit application was incomplete, credit history, lack of collateral, insufficient cash or employment history of the borrowers.

Actions Taken: Stamford's down payment program helps provide access to capital and increases buyer purchasing power. Applicants receive home buyer training, and assistance through the application/purchasing/financing process from housing counselors who assure equitable treatment. In combination with units created through the inclusionary and linkage programs, the City has developed a means of increasing opportunities for segments of the population that may otherwise be impacted by discriminatory practices.

The City is committed to affirmatively furthering fair housing, including making referrals to counseling agencies to ensure that applicants 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 has an Affirmative Marketing Policy and Procedures statement. There are three sections to the policy: General Information on Fair Housing and Affirmative Marketing Policies, Notices for Targeted Properties, and Special Outreach. The policy was developed to assure that participating landlords, organizations and individuals realize that the City adheres to Federal Fair Housing requirements and has an affirmative marketing procedure in place.

## **CR-40 - Monitoring 91.220 and 91.230**

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

CDBG Monitoring: The City of Stamford Community Development (SCD) staff review the Independent Audits for all subrecipients at the time of application and immediately prior to entering into a contract. SCD staff meet with public service subrecipients staff both on-and off-site as needed to review program procedures and accomplishments, and assure accuracy in reporting and timeliness in expenditures. Housing and public improvement activities were monitored on-site. Agencies targeted are those who have recently changed staff and/or must design their own CDBG compliant intake-service client monitoring, for example, economic development recipients. SCD staff meet with agency staff to provide technical assistance. When an agency is selected, their review includes: Adherence to implementation of scope of service in accordance with the executed agreement; Review of clients' income and race/ethnicity and intake form providing data; Review of performance measurements; Documentation of request for payments; Record keeping – file retention, availability and accessibility of data. Site visits include interviews with staff and review of service files to ensure compliance with low-moderate income benefit requirements and contracting/accounting procedures. Remote monitoring is performed for each Subrecipient Activity Report or Request for Payment. All work related to construction progress payments is inspected by SCD staff and/or City inspectors. SCD staff conduct on-site interviews of workers subject to Davis Bacon wage rates and conduct desk reviews of certified payroll reports.

HOME Monitoring: A HOME program monitoring log lists all properties, site contacts, date of last inspection and next required date of inspection. SCD uses the City Building/Health departments to complete inspections. Tenant records are reviewed for projects in the affordability period. Tenancy reports are due by March 1st; a reminder letter is sent with new HUD income levels and rents. All HOME units reporting are compliant. City staff follows up with non-reporting landlords. Administrative site visits are made to assure compliance. The SCD staff uses a combination of on- and off-site monitoring mechanisms. SCD requires documentation for all requests for payment prior to release of funds. SCD staff reviews and approves every request for payment. All work related to construction progress payments are signed off by a project architect and/or City inspector. The site is visited by an SCD staff member, who photographs projects. SCD conducts on-site interviews of workers subject to Davis Bacon wage rates, and conducts desk reviews of certified payroll reports.

For HOME down payment loans, income and property eligibility are reviewed. Before closing, the Health Dept. inspects for code violations and buyers must address any deficiencies. Newly constructed units must have the City Certificate of Occupancy. Continued occupancy is monitored as part of the mortgage portfolio maintenance process. For example, any notification of payoff, or lis pendens, is used to target the property for additional tenancy evaluation.

## Comprehensive Planning Requirements

The comprehensive planning requirements include the community planning and development process of the 5-Year ConPlan, subsequent AAPs, and CAPERs as per 24 CFR 91 Subpart A, C & F. Citizen participation is a vital part of the consolidated plan process, and the City will make sure to follow its HUD approved Citizen Participation Plan (CPP) which helps guide staff to gather community input which is an essential component in identifying the priority housing and community development needs in the City.

The ConPlan is developed every 5 years, with identified priority needs and goals to address these needs. Each year of the 5-Year plan, the City develops an AAP which identifies the projects and activities that will address and further the goals of the plan. This plan is required to be submitted to and approved by HUD each year to receive CDBG and HOME funding annually. At the end of each AAP program year, the City will report on the accomplishments and performance of the program through the CAPER (performance report). Citizen participation is required in the development of each of these stages as per 24 CFR 91.105.

## MBE/WBE Contracts

The City's Community Development Office provides all eligible contractors, including minority- and women-owned businesses an opportunity to procure HOME construction contracts through the Standard Bid Package Documents webpage on its City website. The office provides all necessary documents and general instructions to all bidders, and follows all applicable regulations such as Section 3 and Davis-Bacon. For more details on the Standard Bid Package Documents see: <https://www.stamfordct.gov/government/operations/land-use-bureau-planning-zoning-zoning-enforcement/community-development/standard-bid-package-documents>

## Citizen Participation Plan 91.105(d); 91.115(d)

### **Describe the efforts to provide citizens with reasonable notice and an opportunity to comment on performance reports.**

The City adheres to its HUD approved Citizen Participation Plan to guide its citizen participation process in the development of plans and performance reports for its CDBG and HOME program. At least two public hearings are held throughout the year to discuss housing and community needs and priorities, the proposed strategies in the AAP, affirmatively furthering fair housing and a review of program performance.

To comply with 24 CFR 91.105 (d)(1), the City held a 15-day public comment period to receive comments from the public on the draft 2022 CAPER. **The comment period ran from November 14, 2022 until November 28, 2023.** The draft CAPER was available electronically on the City's website at (<http://www.stamfordct.gov/community-development-office>) and for review in hard copy at the Community Development office at Stamford Government Center, 888 Washington Blvd., Stamford, CT

06904-2152. Comments could be returned to ATTN: Community Development Office at the address above, online or via email

A public hearing was held at the virtual Board of Representatives Housing / Community Development / Social Services Committee meeting on **November 28, 2023 at 6:30pm** to review and discuss the draft CAPER. Members of the public can provide comments orally at the public hearing.

A summary of comments will be attached to the final CAPER report at the conclusion of the public comment period and the public hearing.

## **CR-45 - CDBG 91.520(c)**

**Specify the nature of, and reasons for, any changes in the jurisdiction's program objectives and indications of how the jurisdiction would change its programs as a result of its experiences.**

This PY 2022 CAPER is the third year of the 5-Year 2020-2024 Consolidated Plan and there are no changes to the overall strategies of the Strategic Plan. The priority needs and goals continue to serve as the basis of the 5-Year Strategic Plan. While the needs and goals remain the same, the City may make adjustments to the goal outcome indicators as necessary to properly account for any changes to planned activities and funding priorities during the development of each AAP in the 5-Year planning period.

### ***CDBG-CV***

To fully address the needs of low- and moderate-income residents affected by COVID-19, the City substantially amended its 2019 AAP CARES Act Amendment to include CDBG-CV funds to support public services that helped to prevent, prepare for and respond to COVID-19. The City made another amendment in the Spring of PY 2021 to relocate \$1,229,027 of unspent CDBG-CV funds towards public services for the hungry, homeless, youth, elderly and victims of domestic violence. Other priorities that received these reallocated funds were improvements to public facilities such as safe houses, childcare centers, rehab centers, city parks, and sidewalks. All these activities listed above were tied to efforts to help residents prevent, prepare for and respond to the pandemic.

In PY 2022, the City completed one CV-Public Service activity. This program was the Silversource Elderly Medical Program CV which helped to provide medicine and PPE equipment for 97 seniors in Stamford. The City will continue to work on the established goals for the CDBG-CV program and will continue reporting these accomplishments in future CAPER reports. A summary of accomplishments for CDBG-CV funded activities is located in the CR-05.

**Does this Jurisdiction have any open Brownfields Economic Development Initiative (BEDI) grants?**

No



## **CR-50 - HOME 24 CFR 91.520(d)**

**Include the results of on-site inspections of affordable rental housing assisted under the program to determine compliance with housing codes and other applicable regulations**

*Please list those projects that should have been inspected on-site this program year based upon the schedule in 24 CFR §92.504(d). Indicate which of these were inspected and a summary of issues that were detected during the inspection. For those that were not inspected, please indicate the reason and how you will remedy the situation.*

In PY 2022 there were no HOME activities and there were no on-site inspections.

## **Provide an assessment of the jurisdiction's affirmative marketing actions for HOME units. 24 CFR 91.520(e) and 24 CFR 92.351(a)**

The City of Stamford's office of Community Development, has an Affirmative Marketing Policy. There are three sections to the policy: General Information on Fair Housing and Affirmative Marketing Policies, Notices for Targeted Properties, and Special Outreach. The policy was developed to assure that participating landlords, organizations and individuals realize that the City adheres to Federal Fair Housing requirements and has an affirmative marketing procedure in place. When the City is notified of vacancies, effort is made to assure that individuals who normally might not apply for the vacant rehabilitated units because of their race or ethnicity:

- Are aware of the vacancies;
- Feel welcome to apply;
- Have the opportunity to rent the units.

The City has established an e-mail listing of agencies which are contacted when a unit becomes available. This listing includes Hispanic, Black and Haitian outreach agencies.

HOME outreach efforts to minority/women developers, investors and companies are consistent with the Minority Outreach Statement presented in the Action Plan's Institutional Structure, in which actions are described to develop and improve the institutional structure impacting housing development and availability. The principal means of minority and/or women/disadvantaged business involvement in the HOME program are as Property owner/developer and Construction related contractor. In PY 2022 however there were no minority or women owned businesses contracted in through the HOME program and no HOME funds were expended.

The City of Stamford believes its current affirmative actions in noticing of development opportunities and affordable housing assistance under the HOME programs is adequate. The current "use" of these opportunities indicates effective affirmative action.

**Refer to IDIS reports to describe the amount and use of program income for projects, including the number of projects and owner and tenant characteristics**

According to the PR-09, the City had \$89,587.73 in HOME program income on hand at the beginning of PY 2022. The City did not receive or expend any program income in PY 2022. There were also no HOME program income funds expended on TBRA activities. The final balance at the end of the program year was \$89,587.73.

**Describe other actions taken to foster and maintain affordable housing. 24 CFR 91.220(k) (STATES ONLY: Including the coordination of LIHTC with the development of affordable housing). 24 CFR 91.320(j)**

The City continues to promote the "Below Market Rate" Inclusionary Housing Zoning Program. The Below Market Rate (BMR) program is an initiative of the City of Stamford to achieve a diverse and balanced community with housing available for households of all income levels. Economic diversity fosters social and environmental conditions that protect and enhance the social fabric of the City and are beneficial to the health, safety and welfare of its residents and to the environmental quality and economy of the region. Tenants seeking a BMR unit should contact the development leasing office of the property they are interested in for information and/or to determine the status of a waiting list. Contact information for each building participating in the program can be found on the City's website at:

<https://www.stamfordct.gov/government/operations/land-use-bureau-planning-zoning-zoning-enforcement/community-development/below-market-rate-dwelling-units>

**HOME-ARP**

In September 2021, HUD announced the allocation of \$1,591,663 to the City of Stamford, for a new grant called the Home Investment Partnerships Grant American Relief Plan (HOME-ARP). The purpose of HOME-ARP funds is to provide homelessness assistance and supportive services through several eligible activities. Eligible activities include acquisition and development of non-congregate shelter, tenant based rental assistance, supportive services, HOME-ARP rental housing development, administration and planning, and nonprofit operating and capacity building assistance.

HOME-ARP funds must assist people in HOME-ARP "qualifying populations", which include: sheltered and unsheltered homeless populations; those currently housed populations at risk of homelessness; those fleeing or attempting to flee domestic violence or human trafficking; other families requiring services or housing assistance or to prevent homelessness; and those at greatest risk of housing instability or in unstable housing situations.

To receive funding, the City developed a HOME-ARP Allocation Plan which describes the distribution of HOME-ARP funds and identifies any preferences for eligible activities. The development of the HOME-ARP Allocation Plan was also required and informed through stakeholder consultation and public engagement.

The City identified the need for affordable housing, supportive services and non-congregate shelter for homeless households and those that qualify as having housing instability. The criteria related to these categories include households/persons who are (1) extremely low-income with a severe cost burden, or households with (2) an annual income that is less than or equal to 50% of the area median income meet one of the following conditions from paragraph (iii) of the “At risk of homelessness” definition established at 24 CFR 91.5.

Based on industry standards and current economic conditions, the City estimates four (4) affordable housing units will be created or preserved to the housing stock with the HOME-ARP funding. By adding affordable rental units to the housing stock, the City hopes to reduce homelessness and housing instability for the most vulnerable populations, as well as allowing more availability of emergency shelters beds/units.

## CR-58 - Section 3

Identify the number of individuals assisted and the types of assistance provided

Total Labor Hours	CDBG	HOME
Total Number of Activities	0	0
Total Labor Hours	0	0
Total Section 3 Worker Hours	0	0
Total Targeted Section 3 Worker Hours	0	0

**Table 14 – Total Labor Hours**

Qualitative Efforts - Number of Activities by Program	CDBG	HOME
Outreach efforts to generate job applicants who are Public Housing Targeted Workers	0	0
Outreach efforts to generate job applicants who are Other Funding Targeted Workers.	0	0
Direct, on-the job training (including apprenticeships).	0	0
Indirect training such as arranging for, contracting for, or paying tuition for, off-site training.	0	0
Technical assistance to help Section 3 workers compete for jobs (e.g., resume assistance, coaching).	0	0
Outreach efforts to identify and secure bids from Section 3 business concerns.	0	0
Technical assistance to help Section 3 business concerns understand and bid on contracts.	0	0
Division of contracts into smaller jobs to facilitate participation by Section 3 business concerns.	0	0
Provided or connected residents with assistance in seeking employment including: drafting resumes, preparing for interviews, finding job opportunities, connecting residents to job placement services.	0	0
Held one or more job fairs.	0	0
Provided or connected residents with supportive services that can provide direct services or referrals.	0	0
Provided or connected residents with supportive services that provide one or more of the following: work readiness health screenings, interview clothing, uniforms, test fees, transportation.	0	0
Assisted residents with finding child care.	0	0
Assisted residents to apply for, or attend community college or a four year educational institution.	0	0
Assisted residents to apply for, or attend vocational/technical training.	0	0
Assisted residents to obtain financial literacy training and/or coaching.	0	0
Bonding assistance, guaranties, or other efforts to support viable bids from Section 3 business concerns.	0	0
Provided or connected residents with training on computer use or online technologies.	0	0
Promoting the use of a business registry designed to create opportunities for disadvantaged and small businesses.	0	0

Outreach, engagement, or referrals with the state one-stop system, as designed in Section 121(e)(2) of the Workforce Innovation and Opportunity Act.	0	0
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Other.	0	0
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**Table 15 – Qualitative Efforts - Number of Activities by Program**

## Narrative

On October 29, 2020 HUD made effective a Final Rule, which set new benchmarks for Section 3 under 24 CFR 75. Section 3 helps to establish more economically sustainable communities by ensuring that employment and other economic opportunities generated by Federal assistance for development programs are directed towards very low- and low-income persons to the greatest extent possible, and in particular to those who are recipients of the Federal assistance. The Final Rule changes tracking the number of qualified new hires in Section 3 projects, to tracking the total labor hours worked.

As applicable to the City, the benchmark for Section 3 workers was set at 25 percent or more of the total number of labor hours worked by all workers on a Section 3 project. The benchmark for Targeted Section 3 workers was set at 5 percent or more of the total number of labor hours worked by all workers on a Section 3 project.

Section 3 Projects cover housing rehab/construction and public improvement construction activities assisted under HUD grant programs that provide housing and community development financial assistance that exceeds a threshold of \$200,000. A \$100,000 project threshold applies to grants under HUD's Lead Hazard Control and Healthy Homes programs. In PY 2022, there were no activities that were subject to the Section 3 reporting threshold.