

**COMMENT OF SARAH OWENS AND MICHAEL LIVINGSTON ON THE PY 2015-2016 CONSOLIDATED ANNUAL PERFORMANCE AND EVALUATION REPORT
PROPOSED PURSUANT TO 24 CFR 92.520**

The City's PY 2015-2016 Consolidated Annual Performance and Evaluation Report (CAPER) is another missed opportunity.

Yes, we know that the CAPER format is determined by federal regulation and prepopulated with text from the 2015-19 Housing and Community Development Consolidated Plan (Con Plan), which was adopted by the Salem City Council on April 27, 2015, and that it probably meets the U.S. Housing and Urban Development Department (HUD)'s minimum requirements. But, from a community standpoint, it is not what it should be, and federal regulations and practicalities are not to blame.

The CAPER is supposed to report on our "jurisdiction's" progress in meeting our Con Plan objectives for providing affordable housing and reducing and ending homelessness. 24 CFR 91.520. If the CAPER were merely "a report on the use of" federal program dollars (as it represents on its front cover), there would be less cause for comment. However, comment is warranted as the CAPER also contains gratuitous, overly general and sometimes false characterizations about the City's actions and relationships, particularly its efforts to consult, collaborate and coordinate, that give the reader – including the City Council -- a falsely positive impression of the community's effort to address local housing/homeless problems. The two exceptions are the portions of the CAPER describing: 1) federal programs administration, and 2) Salem Housing Authority actions and administration.

The "missed opportunity" charge has another aspect, which is that the report omits to mention relevant efforts of which City staff *should* have been aware, e.g., the Council's adopting last December the Salem Housing Advisory Committee's recommendation to create an [Affordable Housing Committee](#), and, more recently, the Mayor's appointment of the [Housing Choices Advisory Committee](#) to provide input on the development of code amendments to expand housing choices in Salem as part of the work plan to implement the Salem Housing Needs Analysis (HNA) recommendations. The CAPER also omits to report on the results of the [2016 Point in Time Count for Marion and Polk Counties](#), even though that information has long been available. ([Lane County reported their results last May.](#))

Omissions such as these evince a lack of awareness and communication between City departments, and are not what one would expect from a City that professes to be "very active in community collaboration." Area recipients as well as providers know that the homeless services delivery system in Salem and Marion County is siloed (less than coordinated and collaborative). Moreover, thanks to the Mid-Willamette Homeless Task Force, it is now abundantly clear that public officials have only the vaguest idea of what the City and other are actually doing in this area, and the City's approach to its CAPERs and Annual Action Plans are partly to blame. If the City lacks the resources to give full and accurate progress reports, it should at least stick to the facts, rather than relying on generalizations and clichéd terms (e.g., "best practices", "huge success" and "cross pollinating-funding sources"), that imply much but don't actually convey information.