

Consolidated Annual Performance Evaluation Report (CAPER)



Program Year 2017-2018

(Third Year Activities for 2015-2019 Consolidated Plan)

Consolidated Annual Performance and Evaluation Report (CAPER)



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*City of Salem
Leadership*



Mayor Chuck Bennett

Consolidated Annual Performance Evaluation Report (CAPER)

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Under the U. S. Department of Housing and Urban Development's (HUD) Community Development Block grant (CDBG) and HOME Investment Partnership (HOME) programs entitlement funds are provided to improve the lives of citizens by meeting prescribed federal guidelines.

At the beginning of each fiscal year (FY), the City prepares an Annual Action Plan that informs HUD and citizens what goals and objectives the City intends to meet with CDBG and HOME funds during that upcoming year. At the end of the fiscal year, the City prepares a Consolidated Annual Performance Evaluation Report (CAPER) to illustrate the actual accomplishments achieved during that year.

The CAPER allows HUD, local officials and citizens to assess the use of available resources and to assess the efforts made to achieve the goals and objectives identified in the City's Consolidated Plan and Annual Action Plan. The FY 2017 CAPER captures the expenditures, accomplishments, and progress made on the strategies and goals outlined in the approved third year of the FY 2015-2019 Consolidated Plan (Con Plan).

The cities of Salem and Keizer receive HOME funds as part of a Consortium. The cities extended the cooperation agreement for three years in June 2017.

This report covers the period starting July 1, 2017 to June 30, 2018. Some funded activities from 2015 and 2016 program years are included in this report. *(Note: Nationwide FY 2017 funding allocations were delayed by three months. This funding delay severely impacted accomplishments in both CDBG/HOME activities.)*

The Consortium collaborated with over a dozen for profit and nonprofits entities who applied for funding necessary to carryout planned activities. The federal government prescribes the overarching goals for the activities.

This annual report also provides a general assessment of the City's progress in addressing the priorities and objectives contained in the Con Plan. The FY 2017 Annual Action Plan and other pertinent documents may be accessed through the City's Federal Programs website at <http://www.cityofsalem.net/Pages/application-process-for-grant-funds.aspx>.

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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)**

A summary of the priority needs identified and progress made include:

- **Goal #1- Promote Economic Development**

- Activities Funded / Implemented in this and prior fiscal years: *Microenterprise Training and Technical Assistance / Facilities Modernization*

Subrecipients	Source	Activity	Progress Made
MERIT	2017 CDBG	Microenterprise training and technical assistance	Program activities were completed during the program year. MERIT assisted 32 small businesses.
Interface Network	2017 CDBG	Microenterprise training and technical assistance	Ongoing activity. Assisted 12 small businesses. 14 jobs have been created/retained.
Garten Services	2017 CDBG	Recycling Center Facility Modernization Phase II	Program activities were completed during the program year. Purchased and installed recycling equipment. 12 jobs were created / retained during this program year.

- **Goal #2- End Homelessness**

- Activities Funded / Implemented in this and prior fiscal years: *Case Management and Facility Coordinated Access to Housing; Homeless Prevention Subsidies/Subsistence Payments; and Coordinated Access to Housing Rehabilitation/Conversion Affordable Housing*

Subrecipients	Source	Activity	Progress Made
Center for Hope and Safety	2017 CDBG	Prevention of Domestic Violence Case Management	Program activities were completed during the program year. Assisted 2004 individuals.
Salem Interfaith Hospitality Network	2017 CDBG 2016 CDBG	Homeless Case Management	2017 activities are ongoing. 206 persons were assisted with 2016 funding.
Congregations Helping People	2017 CDBG	Interim Housing (one-time Rental Assistance / Subsistence Payments)	2017 activities are ongoing.
Salem Interfaith Hospitality Network	2017 HOME 2016 HOME 2015 HOME	TBRA in conjunction with supportive services	2017 activities are ongoing. 2016 49 households were assisted. 2015 program funds were completed in 2017. 69 households were assisted.

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- Goal #3-Expand Affordable Housing;
 - Activities Funded / Implemented in this and prior fiscal years: *Rehabilitation for "Aging in Place" Rehabilitation/Conversion Affordable Housing Elderly and Disabled Housing Rehabilitation; New Construction Rental Housing.*

Subrecipients	Source	Activity	Progress Made
Salem Housing Authority	2017 CDBG	Yaquina Hall	Ongoing activity.
Salem Housing Authority	2017 HOME 2015 HOME	Security Deposits	2017 activity is ongoing activity. 2015 HOME funded were completed in 2017. Families were assisted in Salem and Keizer.
Salem Housing Authority	2016 CDBG	Southfair Apts. Rehabilitation	Ongoing activity.
Community Resource Trust	2017 HOME	New construction of affordable housing	Ongoing Activity; Currently accepting applications for the 180 apartments.
Westcare Rehabilitation	2017 CDBG	Transitional Veterans Housing (roof replacement)	Program activities were completed during the program year. The roof replacement resulted in improving the housing for 30 homeless veterans.
Polk CDC (2016)	2015 HOME	West Salem homeowner rehabilitation program	The current construction market is having a significant negative impact on receiving reasonable bids or finding contractors to work on projects; therefore the number of homeowners assisted in 2017 was lower than projected.
Shelly's House	2015 CDBG	Rehabilitation (roof replacement, ADA unit modification, HVAC, etc..)	This is an ongoing activity. Various projects have been completed.
CCSF St. Monica	2016	New construction of affordable housing in Keizer	Ongoing Activity.
CCSF (Renaissance, Winter, River Park, Marilyn, Chemawa)	2015 HOME 2015 CDBG	Major rehab of apartments in Salem and Keizer	Ongoing Activity. Renaissance and River Park in closeout stage.

In addition to the federal resources, during the FY year, the cities of Salem and Keizer expended over \$1.9 million in General Funds to support of various housing and community development priorities identified in the City's Consolidated Plan. The resources include public service support (food, utility assistance, crisis hotline, case management) and working with regional governmental partners to fund a Homeless Initiative Coordinator. These non-HUD accomplishments and resources are not included in the data report.

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Table 1: Goals, Accomplishments (Three Annual Action Plan Years 2015-2017)

Goals	Five Year Plan Goal Outcome Indicator	Accomplishments 2015 PY	Accomplishments 2016 PY	Accomplishments 2017 PY
Goal 1: Promote Economic - Development	Jobs created/retained: 40 Businesses assisted: 250	Jobs created/retained: 10 Businesses assisted: 52	Jobs created/retained: 22 Businesses assisted: 40	Jobs created/retained: 12 Businesses assisted: 32 <i>(Ongoing activity for 2017. Households will be reported in the next CAPER)</i>
Goal 2: End Homelessness- Public Service	Public service activities other than Low/Moderate Income Housing Benefit: 7564 Persons Assisted	1957 Persons Assisted	2016 Persons Assisted	2264 Persons Assisted <i>(Ongoing activity for 2017. Households will be reported in the next CAPER)</i>
Goal 2: End Homelessness- Subsidy Payments	Public service activities for Low/Moderate Income Housing Benefit: 312 Households Assisted	61 Households Assisted	55 Households Assisted	0 Households Assisted <i>(Ongoing activity over 60 households will be reported in the next CAPER)</i>
Goal 2: End Homelessness- Public Facility	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 1700 Persons Assisted	1023 Persons Assisted	0 Persons Assisted	0 Persons Assisted <i>(Activity not funded in 2017)</i>
Goal 2: End Homelessness- TBRA & Transitional Housing	Rental units rehabilitated: 25 Household Housing Unit Tenant-based rental assistance / Rapid Rehousing: 488 Households Assisted	149 Households Assisted	113 Households Assisted	109 Households Assisted <i>(Ongoing activity for 2017. Households will be reported in the next CAPER)</i>

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Goal 2: End Homelessness- TBRA Special Populations	Tenant-based rental assistance / Rapid Rehousing: 56 Households Assisted	15 Households Assisted	0 Households Assisted	0 Households Assisted <i>(Activity not funded in 2017)</i>
Goal 3: Expand Affordable - Housing	Rental units constructed: 16 Household Housing Unit Rental / Owner Occupied units rehabilitated: 200 Household Housing Unit	4 Rental Units Constructed	4 Owner Occupied Units Rehabbed	0 Owner Occupied Units Rehabbed <i>(Ongoing activity. Households will be reported in the next CAPER.)</i>
Goal 4: Neighborhood Revitalization - Availability / Access	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 1623 Persons Assisted	1623 Persons Assisted	0 Persons Assisted	0 Persons Assisted <i>(Activity not funded in 2017)</i>
Goal 4: Neighborhood Revitalization - Sustainability	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 1800 Persons Assisted	0 Persons Assisted	0 Persons Assisted	0 Persons Assisted <i>(Activity not funded in 2017)</i>

NOTE: Only projects completed during the 17-18 Program Year are being reported.

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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)

Table 2 - Accomplishments – Program Year & Strategic Plan to Date
(Data from previous program year included)

Goal	Category	PY Source / Amount Allocated	Indicator	Unit of Measure	Percent Complete (Years 1, 2 & 3)
Promote Economic Development	Non-Housing Community Development	CDBG: \$322,585	Jobs created/retained	Jobs	110%
			Businesses assisted	Businesses Assisted	50%
End Homelessness-Public Service	Homeless	CDBG: \$150,000	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	82%
End Homelessness-Subsistence Payments	Homeless	CDBG: \$50,230	Public service activities for Low/Moderate Income Housing Benefit	Households Assisted	61%
End Homelessness-Public Facility	Homeless	CDBG: \$0	Public Facility or Infrastructure Activities other than Low-Moderate Income Housing Benefit	Persons Assisted	60% (Year 1 Data)
End Homelessness-TBRA and Transitional Housing	Homeless	CDBG: \$164,535 HOME: \$200,000	Tenant-based rental assistance / Rapid Rehousing	Households Assisted	72%
Expand Affordable Housing	Affordable Housing	CDBG: \$612,740 HOME: \$759,970	Rental units rehabilitated/ Homeowner Housing Rehabilitated	Household Housing Unit	25% 2%
Neighborhood Revitalization-Availability/Accessibility	Non-Housing Community Development	CDBG: \$0	Public Facility or Infrastructure Activities other than Low-Moderate Income Housing Benefit	Persons Assisted	0%

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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.

To address specific needs of Low and Moderate Income (LMI) clientele, program year efforts were focused on activities that were identified as priorities in the Consolidated Plan. CDBG activities that helped address the top priorities included: job retention, employment creation, small business assistance, case management and direct payment assistance to prevent homelessness.

As noted on pages five and six Garten, MERIT, Westcare and Center for Hope and Safety completed CDBG activities that address the priorities and objectives in the 2017 AAP.

As detailed in Table 1 - Accomplishments Program Year/Strategic Plan to Date, despite receiving three months into the program year, the majority of programs made progress in addressing either the action plan goals. The housing rehab and new construction activities are delayed due to the amount of time it takes to complete large, subsidized projects during this well documented housing crisis construction environment.

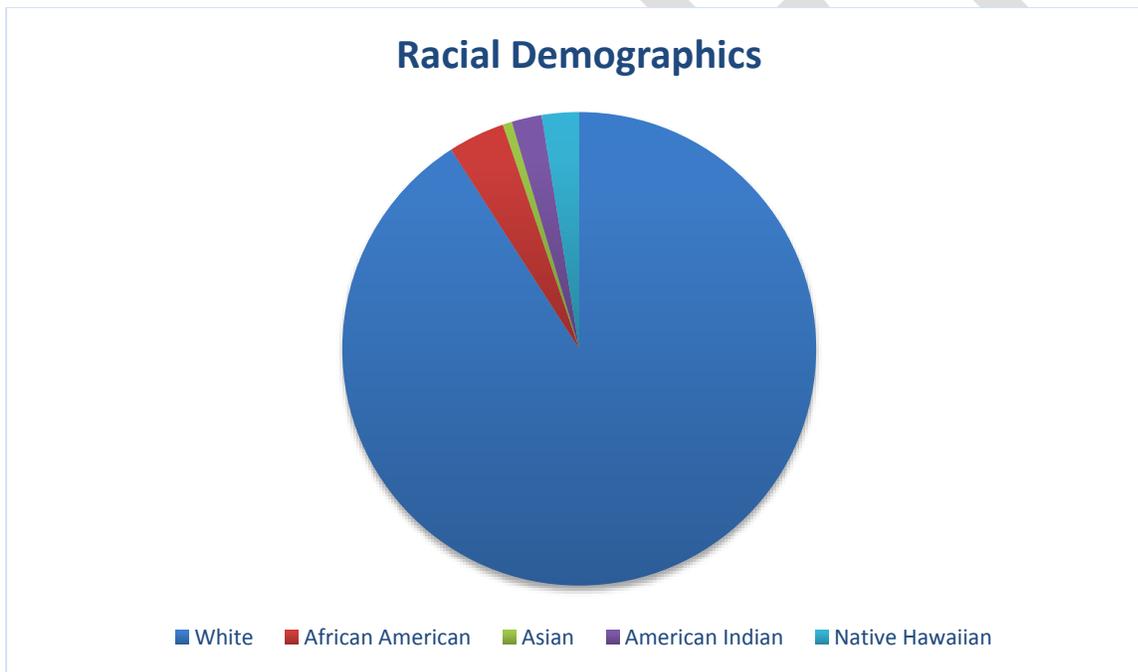
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CR-10 - Racial and Ethnic composition of families assisted
Describe the families assisted (including the racial and ethnic status of families assisted).
91.520(a)

Table 3 – Table of assistance to racial and ethnic populations by source of funds

Race/Ethnicity	CDBG	HOME
White	2101	78
Black or African American	75	10
Asian	9	5
American Indian or American Native	41	4
Native Hawaiian or Other Pacific Islander	51	5
TOTAL	2,277	102
Hispanic	499	12
Not Hispanic	1,779	90
TOTAL	2,278	102



Narrative

These tables reflect the racial and ethnicity of families served by completed activities. The data is collected by subrecipients and reported to the City. The information is confirmed during monitoring.

In some cases, individuals may report a race and then include the ethnicity as Hispanic and in some cases a race is not identified. If a race is not identified then the individual or family will be counted in the white race category.

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CR-15 - Resources and Investments 91.520(a) Identify the resources made available

Table 4 - Resources Made Available

Source of Funds	Resources Made Available	Actual Amount Expended During Program Year
CDBG Entitlement	\$1,209,850	\$ 428,019
CDBG Program Income	\$175,000	\$ 133,902
CDBG Prior Year Unallocated Resources	\$101,830	
HOME	\$614,970	\$501,381
HOME Program Income	\$210,000	\$31,111
HOME Prior Year Unallocated Resources	\$214,940	
TOTAL	\$2,711,428.00	\$1,094,413

Note: Expected amounts available for the above funding sources include unspent prior year funding (balances on hand as of July 1, 2017), along with known or anticipated amounts to be received for PY 2017.

Narrative

The amounts indicated in the "Resources Made Available" column in the table above represent PY2017 resources ONLY. The amounts indicated in the "Amount Expended During Program Year" column indicate dollars spent from PY2017 resources as well as resources remaining from previous program years.

Program income is the gross income received by the grantee or subrecipient directly generated from the use of CDBG or HOME funds. Per HUD guidelines, PI may be used as an additional resource, but is subject to all the other program requirements and must be used prior to the entitlement funds.

According to the HUD provided PR26 report \$561,921 in PY 2017 CDBG resources were expended. The PR05 report for PY2017 shows that \$532,492 in HOME resources were expended in the same program year. Several projects were delayed and are expected to be completed and reported in next year's CAPER.

Identify the geographic distribution and location of investments

Table 5 – Identify the geographic distribution and location of investments

Target Area	Planned Allocation	Amount Allocated	Narrative Description
Salem NRSA	0	0	The City did not receive any applications targeted toward households in the designated NRSA.

The Salem/ Keizer Housing Consortium did not receive any fundable requests in 2017 to exclusively serve the City of Keizer. However, HOME TBRA and Security Deposit funds assisted household residing in Keizer.

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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.

The federal resources that the City receives are leveraged with additional federal, state, local, and private resources. Applicants for FY 2017 CDBG and HOME funds were required to detail all secured and unsecured funding sources in the proposals submitted for review. Subrecipient agreements and at project closeout grantees are required to support the match resources.

The HOME Program requires a 25% match for each HOME dollar invested and excess match may be recorded for use in future years. Federal resources are leveraged with private loans, grants received from local businesses and trusts, LIHTC, Oregon Housing Tax Credits, Oregon Housing Trust Funds, weatherization grants, donations, and volunteer support. Housing developers are encouraged to combine HOME with LIHTC to recapitalize and/or construct affordable housing low-income housing.

The City provided \$400,000 in general funds for individuals and families in need of essential services including food, shelter, health, case management, etc. The CDBG public service allocation works in conjunction with the general fund allocation towards meeting the same goals.

Table 6 – Fiscal Year Summary - HOME Match Report

Fiscal Year Summary – HOME Match	
1. Excess match from prior Federal fiscal year	\$6,161,043.25
2. Match contributed during current Federal fiscal year	\$2,583,453.00
3. Total match available for current Federal fiscal year (Line 1 plus Line 2)	\$8,744,496.25
4. Match liability for current Federal fiscal year	\$ 300,210.95
5. Excess match carried over to next Federal fiscal year (Line 3 minus Line 4)	\$8,444,285.30

Table 7 – Match Contribution for the Federal Fiscal Year

Table 7 – Program Income (HOME report)

Program Income – Enter the program amounts for the reporting period				
Balance on hand at beginning of reporting period \$	Amount received during reporting period \$	Total amount expended during reporting period \$	Amount expended for Tenant Based Rental Assistance \$	Balance on hand at end of reporting period \$
\$210,085	\$308,886	\$31,111	\$26,079.29	\$487,860

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Table 8 – 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						
Dollar Amount	0	0	0	0	0	0
Number	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						
Dollar Amount	0	0	0			
Number	0	0	0			
Sub-Contracts						
Number	0	0	0			
Dollar Amount	0	0	0			

The 2017 project in process, Cornerstone Apartments, will be reported during the next CAPER year. It will include a \$24,000,000 WBE project.

Table 9 – Minority Business and Women Business Enterprises

Minority Owners of Rental Property – Indicate the number of HOME assisted rental property owners and the total amount of HOME funds in these rental properties assisted

	Total	Minority Property Owners				White Non-Hispanic
		Alaskan Native or American Indian	Asian or Pacific Islander	Black Non-Hispanic	Hispanic	
Number	60	0	0	0	2	58
Total	0	0	0	0	0	0

Table 10 – Minority Owners of Rental Property

Relocation and Real Property Acquisition – 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

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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 11 – 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.

Number of Households Supported

	One-Year Goal	Actual
# of households supported through Rental Assistance	168	188
# of households supported through the Production of New Units	240	0
# of households supported through Rehab of Existing Units	86	0
# of households supported through Acquisition of Existing Units	0	0
Total		188

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

The City of Salem had a One-Year Goal to assist 168 households “Number of households supported through Rental Assistance” and the goal was exceeded 111% by providing 188 households with Rental Assistance. This includes assistance with security deposits (Salem Housing Authority 2015) and tenant based rental assistance (TBRA) Salem Interfaith Hospitality Network (2015 and 2016).

The City’s One-Year Goal to assist people with rehabilitation or construction of affordable housing was not met due to various reasons. Financing affordable housing is proving difficult as the cost of construction is far exceeding estimated project costs. At the time goals were being set, in 2014, we could not foresee the impact of the current construction market. In addition, the entire state has been experiencing high construction activity which has resulted in high demand for licensed contractors. This in turn has resulted in the inability for some of the subreipients to complete rehabilitation projects.

Cornerstone Apartments, CCSF rehab and new construction projects will be closed-out in 2018 program year.

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Discuss how these outcomes will impact future annual action plans.

The City is in the process of reevaluating the Consolidated Plan goals. An amendment to the 2015-2019 Con Plan is being presented to the community for review and comment. The revision will include reranking of priorities for the final year of the plan.

Several affordable rental housing projects are under construction. The units completed within the next few years will contribute to the overall creation of over 300 affordable rental units in Salem and Keizer.

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.

Table 12 –Number of Persons Served

Number of Persons Served	CDBG Actual	HOME Actual
Extremely Low-income	2,239	297
Low-income	30	78
Moderate-income	18	54
Total	2,287	429

Narrative Information

The numbers in the above table represent affordable housing projects/programs completed during the 2017 PY including the carry-over of the following projects:

- *MERIT 2017 Economic Development*
- *Westcare – 2017 Roof Replacement*
- *Garten Services – 2017 Equipment Modernization*
- *Salem Housing Authority's 2015-2016 Security Deposit Program*
- *Salem Interfaith Hospitality Network's 2015-2016 Fresh Start Program*
- *Salem Interfaith Hospitality Network's 2016-2017 Fresh Start Program*
- *Salem Interfaith Hospitality Network's 2016-2017 Case Management Program*

The over 2,000 persons assisted by Center for Hope and Safety are considered as a presumed benefit recipient. Persons in this designation are presumed by HUD to be made up principally by Low/Mod income persons (Abused Children, Elderly Persons, Battered Spouses, Homeless Persons, Severely Disabled Adults, Illiterate Adults, Persons Living with AIDS, and Migrant Farm Workers).

Interface Network, CCSF Rehab, Cornerstone Apartments, Shelly's House rehab, Salem Interfaith Hospitality Network's 2017 Fresh Start Program, Salem Housing Authority's 2017 Security Deposit Program, Polk Community Development Corporation's Owner-Occupied Rehabilitation programs are extended into the 2018 Program Year. The accomplishments will be reported in the 2018-2019 CAPER.

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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

During the 2017-2018 Program Year, the City funded public services for homeless and presumed benefit families by partnering with the following organizations: Center for Hope and Safety, Congregations Helping People, and Salem Interfaith Hospitality Network.

The City was able to provide financial support to the following organizations using General Funds dedicated to social service programs designed to prevent and reach homeless persons: Congregations Helping People, Marion Polk Food Share, St. Francis Shelter, Mid-Willamette Valley Community Action Agency (MWVCAA), and two programs through Northwest Human Services.

Sobering Center

The City of Salem is one of several agencies developing a safe, clean, and supervised space to become sober and connect to further treatment. The Oregon legislature and Governor Brown have provided start-up funding for a sobering center in Salem to relieve some of the burden on our regional hospital and jail, and connect individuals with treatment resources. The sobering center will open by early 2019.

Co-location Coordinated Services

The ARCHES program operates an innovative co-location model with roughly 3,000 sq. feet of available office space allocated to align partner agencies efforts to address needs of unsheltered persons. The proximity of services maximizes the potential for increased communication, staff development, cost sharing, as well as the reduction in barriers to services.

The City's strategy of reducing, preventing, and supporting the elimination of homelessness is to support community agencies providing services needed to help move people from homelessness into permanent housing. Through partnerships with local service agencies, housing developers, and job training programs, barriers for persons experiencing homelessness will be reduced, providing the stability, support, and means for those experiencing homelessness to move into permanent housing. This strategy is aligned with HUD's goal of eliminating homelessness.

Through the coordinated efforts of these and other unnamed, the City is reaching individuals with the greatest needs.

Addressing the emergency shelter and transitional housing needs of homeless persons

The City has few shelters for the homeless and even less for homeless families. During the 2017-2018 Program Year, the City of Salem provided funding to Salem Interfaith Hospitality Network (CDBG), Center for Hope and Safety (CDBG), and Northwest Human Services (General Funds) for case management in coordination with shelter for homeless individuals and families. Salem Interfaith Hospitality Network collaborates with local churches to provide emergency shelter for homeless families entering their program.

During the 2017-2018 Program Year, Salem Interfaith Hospitality Network provided

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Transitional Tenant Based Rental Assistance funded with HOME. Center for Hope and Safety provided essential services including emergency shelter for victims of domestic violence and human trafficking. Northwest Human Services provided services including emergency shelter to homeless youth during the Program Year.

Salem's largest homeless shelter for men has outgrown its current location. The facility is in need of rehabilitation to meet City Code. Union Gospel Mission will relocate the shelter to provide improved services and transitional housing opportunities. The City has entered into a purchase and sale agreement to acquire the existing facility. This will help in the ongoing construction and operating fundraising. Once operational, the number of available beds in Salem will increase.

The United Way of the Mid-Willamette Valley recently purchased a property for a homeless youth shelter in Salem. This will be the first dedicated overnight shelter for homeless youth. Homeless advocates expect the shelter to serve 10 guests, ages 11 to 18, at a time. The house has six bedrooms and four bathrooms in 3,482 square feet. The shelter plans to provide mentoring, drug/alcohol services and mental health resources.

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 supports a number of programs to assist low-income individuals and families to avoid homelessness, including providing rapid re-housing assistance to unsheltered persons, allocating funds to keep people in their homes in times of financial crisis, food assistance and case management is available to help persons and families recover and avoid returning to being unsheltered.

Earlier this year, the City organized the Downtown Homeless Solutions Task Force, a 20-member assembly of local government officials, business owners, non-profit representatives, and public safety officials from the cities of Salem and Marion County. The Task Force addressed specific impacts of homelessness in downtown Salem and began work on developing recommendations to address individuals experiencing homelessness. The task force will examine applying the same recommended downtown solutions to issues in north Salem.

Launched in July 2017, HRAP is one of the City of Salem's key strategies to reduce the number of chronically homeless individuals in Salem. With a goal to house 100 of the "hardest to house" homeless individuals in its first year, the Homeless Rental Assistance Program successfully sheltered over 60 individuals. It is one of the largest "Housing First" programs in Oregon. The program combines rental assistance, intensive case management services, and funding to reduce other barriers to client success. The City's \$1.4 million program investment is being leveraged with federal and private foundation resources.

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Following the recommendation of the Mid-Valley Homeless Initiative, the City of Salem contributed \$45,000 toward the hiring of a regional coordinator at the Mid-Willamette Valley Council of Governments. This person is responsible for planning and coordinating programs and projects to prevent and reduce homelessness with our region's cities, counties, agencies, and services providers. The program coordinator is responsible for the overall management of specialized efforts to develop a cohesive, collaborative and coordinated system of care that extends the reach of resources available to the Mid-Willamette Valley homeless population. The Coordinator is meeting regularly with City staff, Rural Oregon Continuum of Care (ROCC) and regional collaboratives to design a coordinated effort to address homelessness.

Funding was provided to the Salem Housing Authority for their Security Deposit Program. During the 2017-2018 Program Year, Salem Interfaith Hospitality Network also received funding for their Fresh Start TBRA Program, giving preference to families with children experiencing homelessness.

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

Congregations Helping People (CHP) received CDBG funding for one-time crisis rental assistance (subsistence payments) and social service General Funds for one-time crisis utility assistance. These two programs provide assistance provide support needed to prevent homelessness. CHP has a strong evaluation system to ensure the family is able to sustain housing in the future.

Westcare completed a roof replacement at a public facility focused on providing housing for homeless veterans.

Garten Services Inc. received CDBG funding for their Facility Modernization project. This project retained and created jobs for persons with disabilities allowing them to earn living wages and providing stability in income and subsequently stability in housing.

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

Actions taken to address the needs of public housing

The City awarded HOME funding to the Salem Housing Authority (SHA) for a Security Deposit Program to all residents of Salem and Keizer, including those interested in living in publicly owned housing facilities.

SHA operates a Family Self Sufficiency Program that connects Section 8 or Public Housing tenants to outside resources to remove barriers that prevent families from being self-sufficient and that helps them achieve better living conditions. SHA staff assists tenants in setting individual goals such as: financial management, preparation for homeownership, completion of a GED, or vocational training to acquire job skills, often translating into higher income jobs and self-sufficiency. These goals are converted into a five-year contract that includes completion dates or deadlines to help keep tenants accountable. Staff meets with tenants on a quarterly basis, or more frequently if needed, to offer encouragement and moral support throughout the five-year period.

SHA has dedicated staff that assists senior clients residing in public housing who rely on resources to continue to live independently.

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

The Housing Authority of the City of Salem (SHA) is proactive in incorporating resident input into the agency's policy-making process. An equitable and transparent policy-making process that includes the opinions of residents is achieved through the involvement of one tenant serving on the board with a goal of at least three to five tenants attending. There is no restriction of the maximum number of tenants allowed to participate. Tenants are always welcome to attend meetings without actually serving on the committee.

The Family Self Sufficiency Program Coordinating Committee (PCC) is comprised of residents and social service professionals who review proposed changes to the Action Plan. The Resident Advisory Board is responsible for reviewing the Public Housing Annual Plan. Tenants receive newsletters and other correspondence ensuring awareness of SHA activities and are encouraged to provide feedback to staff.

All tenants are given a 30-60 day period to comment on updated utility allowances, changes made to the security deposits, updates to maintenance charges, and modifications to the Admission and Continued Occupancy Policy as well as revisions to leases, and addendums or other items that could directly affect them.

Actions taken to provide assistance to troubled PHAs

The Housing Authority of the City of Salem is not designated as troubled under 24 CFR Part 902.

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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 provides System Development Charge (SDC) waivers for organizations constructing new affordable housing that utilize federal funds. This waiver reduces the cost of construction which provides incentives to construct affordable housing for families that earn 60% or less of the local area median income. Organizations utilizing HOME and/or CDBG funds are required to maintain the property as affordable for a prescribed number of years as outlined in the HOME and CDBG requirements. To ensure the maintenance of affordable housing, the City monitors subrecipients on a regular basis.

Other actions taken:

- On an as-needed basis, strengthened intergovernmental relationships to resolve regulatory issues.
- Federal Programs staff participated in various land use application review processes.
- Increased technical assistance to address and reduce findings/concerns identified through the monitoring of subrecipients.
- Continued to educate nonprofit and for profit affordable housing developers and public service agencies regarding new or changing requirements
- Authorized a program that offers property tax exemptions for low-income housing held by charitable, nonprofit organizations. The tax exemption is intended to benefit low-income residents and support the availability of low-income housing units in the City.
- The City is working to increase the amount of land that can be developed into multifamily housing. The 2015 Housing Needs Analysis showed that the Salem area has a projected 207-acre deficit of land for multifamily housing based on a 20-year population projection.
- In July 2017, the City changed its rules to allow accessory dwelling units, also known as mother-in-law units, in Salem. The City has approved 15 such units so far, with more under review.
- In the past three years, the City issued building permits for 1,317 multifamily units. That is more than the total number issued over the 10 prior years combined: 1,298 units. This recent surge in housing choices meets a need that is expected to continue over the next few decades.
- According to the 2015 Salem Housing Needs Analysis, the Salem area is expected to grow by nearly 60,000 people by 2035. This growing population will need a mix of smaller and less expensive units, and more housing types, including more multifamily housing, according to the study.
- The community and City of Salem recognized the need to increase affordable housing options as part of the recent strategic planning initiative. The 2017 Salem Strategic Plan, which articulates goals for the City, identified affordable housing as a priority.

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

The diminishing amount of funds to meet underserved needs continues to be the most significant obstacle to addressing the needs of underserved populations. While some of these barriers can be reduced through collaborative processes and increasing program efficiencies, the need will continue to outpace the local revenue.

Actions taken in 2017-2018 include:

- Worked with public and private agencies to better understand the obstacles in meeting underserved needs. Attending monthly Health and Housing meetings, participating in the annual Point in Time Count (PIT), and participating in Emergency Housing Network (EHN).
- Financially supporting the 2018 Marion County Community Homeless Connect, an annual event connecting homeless and those at risk of homelessness to free community resources and health services.
- Revisiting the priorities and goals addressed in the current Consolidated Plan, before recommending future projects for HOME and CDBG funding.
- No Interest (0%) Deferred Payment Loans: Home repair loans are offered to very low-income (under 60 percent of AMI) owner-occupants of 1-unit properties Citywide up to \$25,000 to eliminate health and safety hazards and implement neighborhood improvements. Full repayment of principal is required upon future sale, further encumbrance, or non-owner occupancy or depending on the amount of the loan, 5 to 15 years from the date of the loan, whichever occurs first.
- Maintain its support of non-profit agencies, the local housing authority, homeless providers and special needs groups in their goal to meet the underserved needs of the community. The City will continue to provide technical assistance to providers in pursuit of Federal, State, and other funding sources.

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

According to the Code of Federal Regulations (CFR) 24 part 35, any housing rehabilitation project involving housing constructed before 1978, and receiving \$5,000 or more in Federal funds, shall be tested for lead-based paint. All projects meeting those parameters with identified lead-based paint hazards are to be mitigated or abated. City policy is to abate all reported lead based paint with levels exceeding the acceptable limits.

Actions taken to reduce the number of poverty-level families. 91.220(k); 91.320(j)

More than 16.7% of families residing in Salem fell below the Federal Poverty Line in 2010, which is 2.7% higher than the 14% reported for the entire State of Oregon. Poverty reduction strategies in the City encompass a variety of processes that provide support to agencies assisting low and moderate-income households as they progress toward economic self-sufficiency. Salem Interfaith Hospitality Network provides Homeless Case Management and Tenant-Based Rental Assistance, allowing a two-fold approach to self-sufficiency including housing stability.

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Congregations Helping People provides rental assistance (subsistence payments) to families in crisis situations, reducing the likelihood of homelessness for those families and providing an opportunity for self-sufficiency. MERIT and Interface Network provide training and technical assistance to microenterprises. Through this training and technical assistance, low and moderate-income business owners are able to secure their own careers and create job opportunities for others through business development. Garten Services Inc. provides job creation and job training opportunities with a focus on persons with disabilities. This creation of jobs and job training provides employment skills and generates employment stability for individuals.

Actions taken to develop institutional structure. 91.220(k); 91.320(j)

The City of Salem is committed to developing institutional capacity. Newly appointed federal programs staff will prove to enhance program compliance and utilization of resources. Staff will work closely with HUD and industry partners to remain abreast of regulations and best practices.

The staff will participate in appropriate trainings and continue to update and receive feedback from the City Council on the status of projects and the progress of meeting program goals.

Institutional transparency and communication with the community are top priorities for all city projects. City staff will meet with stakeholders and hold public listening sessions to ensure the needs of the community are being met with the available funding and resources.

Partner agencies will receive technical assistance and support from City staff.

The City is a member of the Emergency Housing Network (EHN). The Emergency Housing Network brings together hundreds of community partners and stakeholders who want to network with, educate, or update other advocates and agencies serving the homeless and at-risk populations of greater Salem. This is an opportunity for the City of Salem to receive and provide professional development and resource sharing with hundreds of community partners.

City will evaluate current institutional structures and serve as a resource, as, needed.

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

Coordination between public and private housing and social services agencies is an extremely important activity. The City participates in workgroups of the Continuum of Care (CoC) collaborative, which is comprised of various housing and social service agencies. The City also attend monthly Emergency Housing Network (EHN) and Health & Housing collaborative meetings attended by services providers. Partnering with these institutions is vital to overcoming any gaps in institutional structure.

The City of Salem participate in regulated monitoring of projects that received both City of Salem federal funds and State of Oregon funding such as Low Income Housing Tax Credit (LIHTC) funds. This coordination is a streamlining effort to reduce the burden of entry for tenants occupying funded units, and to reduce the administrative burden of monitoring on the City of Salem and the State of Oregon.

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

Impediments to Fair Housing Choice are defined as any actions, omissions, or decisions taken because of protected class status that have an effect of restricting housing choice or the availability of housing choice. The federally protected classes are race, color, religion, sex, disability, familial status, or national origin. The State of Oregon adds the following classes as protected classes within the State of Oregon: marital status, source of income, sexual orientation including gender identity, honorably discharged veterans/military status, and domestic violence. At a local level, age is added. The analysis reviews the laws, regulations, administrative procedures, and practices of the entitlement community. It assesses how laws affect the location, availability, and accessibility of housing while considering conditions, both public and private, affecting fair housing choice for all protected classes within the jurisdiction.

Efforts for 2017 – 2018 provided by the Fair Housing Council of Oregon performed under contract with the City:

Education: Trainings / Outreach

Eighteen fair housing trainings and/or outreach opportunities were conducted during the year. Participants included City of Salem staff, residents, social service agencies, nonprofit housing providers, and shelter providers. Some of the issues covered included fair housing basics, recent changes in the law related to criminal history screening and harassment, and fair housing requirements for shelters.

- 7/11 Salem Housing Authority, 44 attendees
- 11/9 Emergency Housing Network, 60 attendees
- 12/14 Emergency Housing Network, 60 attendees
- 1/11 Emergency Housing Network, 60 attendees
- 1/24 DHS Self Sufficiency, 37 attendees
- 1/25 Marion County Adult Behavioral Health, 19 attendees
- 2/8 Emergency Housing Network
- 2/24 Mexican Consulate Event
- 3/2 Salem-Keizer Public Schools STEP, 24 attendees
- 3/14 Salem Head Start / MWVCAA, 18 attendees
- 4/4 Marion County Health and Human Services Intensive Training, 7 attendees
- 4/12 Custom Class, particularly hoarding as a disability, 31 attendees
- 4/12 Emergency Housing Network
- 5/2 North Salem Service Integration Team
- 5/11 Salem Housing Authority, hoarding focused, 18 attendees
- 5/18 Fair Housing 101, 4 attendees
- 5/22 Emergency Housing Network
- 6/14 Emergency Housing Network

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Enforcement: Intakes and Referrals

FHCO screened 145 inquiries i.e., intakes, from Salem residents on the housing discrimination hotline. This is an 8 % increase over FY16-17.

Intake Issues Resolved:

- Source of Income Complaint related to a Housing Choice Voucher issued the SHA
- Reasonable accommodation
- National Origin discrimination

One issue was referred to Legal Aid for possible litigation.

FHCO Tester Pool

FHCO conducted tester trainings and conducted a year long fair housing radio campaign on Spanish Language radio. An October interview can be found at:

<https://www.facebook.com/FairHousingCouncilOregon/posts/1690168617680249>

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CR-40 - Monitoring 91.220 and 91.230

Description of 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

The HOME program was monitored by HUD from August 9-18, 2017 for program years 2014, 2015 and 2016. Concerns and findings are being addressed. As a result of the monitoring, the City followed the recommendations provide by HUD. The City was required to submit a CDBG workout plan to address the timeliness requirements due to staff turnover and funding larger projects prior to achieving shovel readiness. Increased monitoring of subrecipients, along with administratively repositioning CDBG resources to support alternative projects are part of the workout plan.

With regards to ongoing monitoring of subrecipients program staff and CSHC are assessing the allocation process and annual risk analysis of activities to be funded. Workflow processes are being improved. In addition, desktop monitoring and ongoing technical assistance is provided to ensure program accountability. The City also requests copies of completed professional audits for all applicants.

For rehabilitation or construction projects, ongoing monitoring occurs throughout the construction. This includes review of the bid packet, preconstruction meetings, monitoring of compliance for Davis Bacon and any additional federal, state and city requirements.

CDBG and/or HOME allocations for programs/projects have met the completed timelines with a few exceptions. Some delays occur due to budget changes, construction timelines, or startup of new programs. The following projects/programs extended the anticipated completion date to sometime during the 2018-2019 Program Year:

CDBG Program:

Catholic Community Services Foundation rehabilitation of various properties, Salem Interfaith Hospitality Network's Case Management, Interface's Microenterprise technical assistance, Salem Housing Authority's Southfair rehabilitation, Shelly's House Reentry Renovation, Congregations Helping People Subsistence payments and Salem Housing Authority's Yaquina Hall rehabilitation.

HOME Program:

Salem Housing Authority's Security Deposit Program, Polk Community Development Corporation' Owner Occupied Rehabilitation Program, Catholic Community Services Foundation rehabilitation of various properties, and Salem Interfaith Hospitality Network's Fresh Start TBRA Program.

For these projects, the accomplishments will be included in the 2018-2019 CAPER. Subreceptients are aware that if projects or programs are not completed within the required deadline this could affect future funding requests.

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HOME rental housing projects are tracked through a matrix and monitored according to HUD prescribed guidelines. HOME monitoring ensures that recipients manage projects in compliance with HOME eligibility and record keeping requirements. Property inspections must meet the requirements of the State, UPCS, local codes, and City rehabilitation standards for projects located in the cities of Salem and Keizer. All projects are monitored on a three-year cycle unless risk factors require more frequent monitoring.

Monitoring includes site visits and physical inspections (a minimum of 20% of the units are inspected), client eligibility documentation review, tenant/participant file review (a minimum of 20% of the units are inspected), management systems review (administrative and financial), vacancy rate review, and financial review.

The total amount of HOME funding in a project or units, in the case of rental rehab, determines the duration the project must comply with HOME regulations. All HOME property owners submit an annual report for housing projects still within the affordability period. This report indicates if there is a change in staff, property management companies, vacancy rate, when source documentation is required, level of replacement reserves, and other pertinent information to ensure understanding of the HOME program expectations. Annual reports are reviewed by staff to determine if risk levels have increased resulting in the need for more frequent monitoring, technical assistance or if personal contact is needed. This report has proven to be a very useful monitoring tool.

When programs or projects are out of compliance, staff works diligently with subrecipients to correct issues. An important part of this effort includes coaching subrecipients on the development of the organization's policies and procedures manuals.

Every claim for reimbursement must include complete documentation to support the request or funds will not be disbursed until the information is received. Documentation typically includes Client Eligibility Forms, timesheets, tenant based rental assistance set up forms, and/or invoices.

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

Description of the efforts to provide citizens with reasonable notice and an opportunity to comment on performance reports.

The notice of a 15-day public comment period providing citizens the opportunity to review and submit feedback was posted in the Statesman Journal. The City Council will be conducting a Public Hearing on September 10, 2018 in the Council Chambers.

The drafted CAPER is available on the City's website, and in paper format at the front desk of Urban Development Department, City of Keizer Planning/Zoning/Community Development, and at Salem's Public Library. It is also being transmitted to the CSHC mailing list, Keizer and Salem Neighborhood Associations, NAACP, and each subrecipient.

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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.

During the Program Year the City did not change the program objectives as it pertained to the Con Plan or the Annual Plan. The City is in the process of changing program priorities based upon current housing needs. The need for housing and supportive services will be the top priority.

Staff is in the process of drafting the Consolidated Plan Amendment for public review and comment. The Amendment will be presented to Council for action this fall. The revised priorities will be applicable to the 2019 funding application process, which is intended to be announced for November/December.

Does this Jurisdiction have any open Brownfields Economic Development Initiative (BEDI) grants?	No
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[BEDI grantees] Describe accomplishments and program outcomes during the last year.

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CR-50 - HOME 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 §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.

Based upon the 2013 HOME Rule regarding on-site monitoring, the City conducted on site monitoring of Statesman Village multi-family housing project funded with HOME during the program year.

Monitoring of new projects during construction/rehabilitation was conducted on properties under construction during the 2017-2018 Program Year included single family rehabilitation projects through Polk Community Development Corporation, Cornerstone Apartments, Catholic Community Services St. Monica New Construction, Shelly's House rehabilitation, and various rehabilitation projects of Catholic Community Services (Marilyn, Winter, River Park, Renaissance, and Chemawa).

The City utilizes a Master Tracking spreadsheet indicating the last monitoring and the proposed date of the next monitoring. All findings are required to be resolved. For physical inspection findings, the City re-inspects upon completion of resolutions. If during re-inspection it is determined that items have not been sufficiently resolved or not resolved, a third inspection is conducted at a cost of \$100 to the owner (each subsequent re-inspection is an additional \$100). Concerns are required to be addressed. Responses from the owner to the initial monitoring letters sent out are required within 30 days of the date on the letter.

Provide an assessment of the jurisdiction's affirmative marketing actions for HOME units. 92.351(b)

Flyers are available at various locations, news articles are published in local newspapers, and information is available on the City's website, which details all available programs and the parameters under which citizens may gain access to services. All written information includes the following language to ensure that all citizens have access:

“It is the City of Salem's policy to assure that no person shall be discriminated against on the grounds of race, religion, color, sex, marital status, familial status, national origin, age, mental or physical disability, sexual orientation, gender identity, and source of income”, as provided by Salem Revised Code Chapter 97. The City of Salem also fully complies with Title VI of the Civil Rights Act of 1964, and related statutes and regulations, in all programs and activities”.

All HOME projects with five or more units are required to submit an Affirmative Fair Housing Marketing Plan (AFHMP) that includes the affirmative marketing actions undertaken. Review of the AFHMP occurs with owners during the HOME monitoring to ensure information continues to be current.

For the Salem Urban Development Community Services and Housing Commission and other public meetings, the following information is included on agenda's:

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“In order to ensure the broadest range of services to individuals with disabilities, the City of Salem will be pleased to make necessary arrangements. To request services (interpreter, etc.) please call the number listed below at least two working days (48 hours) in advance. Voice: 503-588-6178, TTY: 503-588-6370. It is the City of Salem’s policy to assure that no person shall be discriminated against on the grounds of race, religion, color, sex, marital status, familial status, national origin, age, mental or physical disability, sexual orientation, gender identity and source of income, as provided by Salem Revised Code Chapter 97. The City of Salem also fully complies with Title VI of the Civil Rights Act of 1964, and related statutes and regulations, in all programs and activities.

Si necesita ayuda para comprender esta informacion, por favor llame 503-588-6178”.

In addition, the following icons are printed along with program information: accessibility, Equal Employment Opportunity Commission, Equal Housing Opportunity (Fair Housing Logo), and HUD Logo.

All programs funded through Federal Programs are required to post a statement documenting affirmative marketing on materials provided to clients for the program. Many of the organizations post this statement in applications, on websites, and in brochures for their programs.

The City does not anticipate changing the affirmative marketing actions.

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

Table 13

Sources of Funds	Expected Amount Available	Actual Amount Expended PY 2017
CDBG Program Income	\$175,000	\$ 133,902
HOME Program Income	\$210,000	\$31,111

CDBG and HOME program income is used to fund multiple projects/programs. As projects request reimbursement, the City draws from PI and then EN based on the amount of PI available.

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

The City continues to help foster and maintain affordable housing by providing HOME funds to CHDOs and other nonprofit housing organizations with an affordable housing mission. These partnerships have helped to remove many housing barriers including limited availability and coordinated housing. Additionally, the combination of HOME and CDBG funds over the past year have provided programs including but not limited to subsistence payments, tenant based rental assistance, security deposits, job training programs, and case management activities. These programs assist in addressing barriers such as fees and charges, limitations, coordinated housing, job creation, and job training. The City provides System Development Charge waivers for

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organizations constructing new affordable housing using federal funds allocated through the Federal Programs Division. This waiver reduces the cost of construction which provides incentives to construct affordable housing for families that earn 60% or less of the local area median income. Organizations utilizing HOME funds are required to maintain the property as affordable for a prescribed number of years as outlined in the HOME and CDBG requirements. To ensure the maintenance of affordable housing, the City follows all compliance monitoring requirements on a regulated schedule.

At the time when property is acquired or rehabilitated, steps are taken to prevent as much tenant disruption as possible. Required notices are sent to tenants as part of the application process and at time of award. Verification that these steps have been taken is a condition of funding to the organization for the project. Staff attends Uniform Relocation Act (URA) training whenever offered and trains subrecipients on the importance of compliance.

APPENDICES

Appendix A: Public Comments

Appendix B: Proof of Publication

Appendix C: IDIS Reports

PR26: CDBG Financial Summary Report

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Appendix A: Public Comments

To be completed after public review

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