

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.

A total of five (5) CDBG PY 2022 activities were conducted in PY 2022, plus the pre-construction design and engineering components for the expansion of the Pearland Neighborhood Center. The PY 2022 projects included Code Enforcement, which is back into full implementation after a COVID-19 hiatus, mental health counseling services, emergency subsistence - rental assistance, housing rehabilitation, and youth aftercare/child-care services. A total of \$216,626.53 was expended carrying out PY 2022 activities, with an additional \$22,552.96 used to reimburse the cost of design/architecture expenditures incurred by the Pearland Neighborhood Center for its expansion. A total of \$61,121.60 was used for General Program Administration in PY 2022.

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 / Amount	Indicator	Unit of Measure	Expected – Strategic Plan	Actual – Strategic Plan	Percent Complete	Expected – Program Year	Actual – Program Year	Percent Complete
Code Enforcement	Non-Housing Community Development	CDBG: \$	Housing Code Enforcement/Foreclosed Property Care	Household Housing Unit	1000	1385	138.50%	100	1385	1,385.00%
Flood Drainage Improvements	Non-Housing Community Development		Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	Persons Assisted	1500	0	0.00%			

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Food Pantry	Non-Housing Community Development		Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	250	0	0.00%			
Handicapped Centers	Non-Housing Community Development	CDBG: \$	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	Persons Assisted	45	62	137.78%			
Mental Health Services	Non-Housing Community Development	CDBG: \$	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	15	163	1,086.67%	50	63	126.00%
Owner Occupied Housing Rehabilitation	Affordable Housing	CDBG: \$	Homeowner Housing Rehabilitated	Household Housing Unit	10	6	60.00%	15	3	20.00%
Senior Centers	Non-Housing Community Development	CDBG: \$162834	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	Persons Assisted	200	136	68.00%	100	136	136.00%
Senior Services	Non-Housing Community Development		Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	200	97	48.50%			

Sidewalk Improvements	Non-Housing Community Development	CDBG: \$	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	Persons Assisted	1505	0	0.00%			
Subsistence Payments	Non-Housing Community Development	CDBG: \$	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	0	0		20	21	105.00%
Subsistence Payments	Non-Housing Community Development	CDBG: \$	Tenant-based rental assistance / Rapid Rehousing	Households Assisted	0	0		15	0	0.00%
Subsistence Payments	Non-Housing Community Development	CDBG: \$	Homelessness Prevention	Persons Assisted	55	87	158.18%			
Water Improvements	Non-Housing Community Development	CDBG: \$	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	Persons Assisted	1000	677	67.70%			

Table 1 - Accomplishments – Program Year & Strategic Plan to Date

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.

A total of 2,629 beneficiaries were served with CDBG funds in PY 2022. The final year of the 2017-2022 Consolidated Plan strategy resulted in accomplishments for ten (10) activities. A total of \$277,748.13 in expenditures were incurred for four projects/activities, one of which involves multi-year allocation for housing rehab (\$44,035). A total of \$22,552.96 was spent on non-construction costs related to the Pearland

Neighborhood Center expansion, and \$61,121.60 went to PY 2022 General Program Administration. The table below provides an overview of accomplishments related to each expenditure. No COVID-19 expenditures were incurred in 2022, as there is a need to make amendments to the intended uses for those funds. Roughly 98% of the funds allocated for homebound meal delivery were spent in PY 2020, and the need for rental assistance will remain at the current expenditure level, with roughly 56% of funds allocated to the CDBG-CV1 and CDBG-CV3 projects in need of reallocation. Table 1.2 below provides a look into the current year accomplishments, as well as those from the immediate prior two years (PY 2019 and PY 2020).

Table 1.2 Current and Prior Years Performance

CDBG Action Plan Activity	Beneficiaries			Activity Multi-Year Totals
	HUD CDBG Program Year			
	2019	2020	2021	
	City of Pearland Fiscal Year			
	2020	2021	2022	
A/C Transite Waterline Replacements	629	629	677	1,935
Knapp Center Transportation*	0	0	97	97
Code Enforcement	0	0	1385	1,385
Housing Repairs*	0	0	3	3
Mental Health Services	46	54	63	163
Emergency Rental Assistance	31	35	21	87
Homebound Meal Delivery	394	1529	823	2,746
Forgotten Angels - Vocational Facility*	59	59	62	180
Knapp Center Facility Improvements*	0	0	136	136
Child/After-Care Services	0	0	50	50
Annual Beneficiaries Served	1,159	2,306	3,317	6,782

**Note: Program/Activity inactivity due to impact of COVID-19 closures.*

2022 Financial Activity Details

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CDBG Action Plan Activity	Beneficiaries			Activity Multi-Year Totals
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Child/After-Care Services	0	0	50	50
Annual Beneficiaries Served	1,159	2,306	3,317	6,782

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2022 Performance Details

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
White	2,020
Black or African American	808
Asian	26
American Indian or American Native	463
Native Hawaiian or Other Pacific Islander	0
Total	3,317
Hispanic	619
Not Hispanic	2,698

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

Narrative

As historically has been the case, the program continues to serve a diverse population of Pearland residents. Some race/ethnicity is congruent with the local population demography, such as the 24% of blacks/African-Americans served with CDBG funds. The local population of African Americans in Pearland is 25% of the total. Service to the Asian community is relatively low in comparison to earlier years. Hispanic beneficiaries make up 18.66% of those served in PY 2022

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	462,666	414,653

Table 3 - Resources Made Available

Narrative

Identify the geographic distribution and location of investments

Target Area	Planned Percentage of Allocation	Actual Percentage of Allocation	Narrative Description
Pearland Historic Old Townsite	13	13.11	Code Enforcement

Table 4 – Identify the geographic distribution and location of investments

Narrative

Code enforcement activities have re-emerged after impediments to serving the target area arose during COVID-19.

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.

No leveraged additional resources were utilized in conducting PY 2022 CDBG activities.

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	35	3,231
Number of Special-Needs households to be provided affordable housing units	0	62
Total	35	3,293

Table 5 – Number of Households

	One-Year Goal	Actual
Number of households supported through Rental Assistance	20	21
Number of households supported through The Production of New Units	0	0
Number of households supported through Rehab of Existing Units	15	3
Number of households supported through Acquisition of Existing Units	0	0
Total	35	24

Table 6 – Number of Households Supported

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

The two biggest areas of difference between goals and outcomes involve the numbers served by the Code Enforcement activity, and homebound meal delivery. A total of 1,385 code violation cases were investigated in PY 2022, which involves a program that was unable to function in the target area, and many other areas of town during COVID-19, in the manner the program anticipated. This was due to the need to support a vast array of needs involving restaurant closings during COVID-19 and related economic recuperation efforts to reopen businesses. In addition, unplanned aspects of the 2017-2022

Consolidated Plan due to COVID-19 made certain activities necessary that were not anticipated prior to the Coronavirus pandemic. The only downside involves the housing rehab program, which is just beginning its resurgence following the COVID-19 pandemic.

Discuss how these outcomes will impact future annual action plans.

As the pandemic begins to subside, the City anticipates service levels to return to normal, which will produce beneficiary numbers that are more in line with 400 - 500 service recipients. Future action plan years will unlikely involve pandemic response spending, so action items will become more simplified and associated with normal social service and facility improvement programs.

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	62	0
Low-income	3,255	0
Moderate-income	0	0
Total	3,317	0

Table 7 – Number of Households Served

Narrative Information

The extremely low income population served continues to be the mentally-disabled adult group that is housed and served by the Forgotten Angels Foundation. All others fall within the low and/or very low income levels.

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 struggles with the issue of serving homelessness, largely due to the statistically insignificant number of homeless that could be tied to the City’s area of impact, and somewhat due to the transiency that occurs due to the supposition that they are largely associated with the outskirts of the City. Statistical evidence is generally the only way to identify a numerical value for the number of homeless individuals, aside from the number of beds filled in shelters just outside the City limits. Nonetheless, the City is committed to providing assistance where it can, but the CDBG resources being allocated do not seem to be the most feasible approach to addressing the problem. Similar to addressing issues of slum and blight, the issues are extremely “spot basis,” and difficult to track due to the very limited visibility of the problem. Unchanged from year to year, the number of homeless the community is able to identify never seem to total more than 5 people, but the City will continue to monitor for problems and develop any necessary resources towards sheltering if/when possible. The anticipated needs due to Hurricane Harvey were largely unrealized, so the planned objectives may be moot.

The City of Pearland, at the time of this CAPER, did not fit into any particular PIT count analysis that would make it feasible to calculate the number of homeless in the City, but the available information from Brazoria County shelters, Harris County PIT Count statistical analysis of the portion of the City of Pearland in the County, and the same for Fort Bend County in Pearland shows no statistically significant homeless people in Pearland (Pearland is located primarily in Brazoria County, but also has small portions in Harris and Fort Bend).

Addressing the emergency shelter and transitional housing needs of homeless persons

As stated in the above CR-25 narrative regarding the City’s efforts to reach out to homeless persons and assessing their individual needs, the small number of homeless in the City are difficult to serve due to the seemingly transient and situational characteristics of those without housing in Pearland. Based on typical “bed count” assessments, particularly in the areas to the south of Pearland, where most homeless in Brazoria County are served, shelters typically have room for additional individuals, so the need for sheltering and/or transitional housing seems to be limited, if non-existent at this time. Non-profit organizational development in this area has been unsuccessful, largely due to the lack of a viable service target. Of the six documented non-profit agencies in Pearland with an official mission statement designed to serve the homeless (Labor of Faith, Daystar Adopt A Village, K Mejia Community Association, Young Life Brazoria County, Christian Helping Hands, and Pearland Neighborhood Center), only Christian Helping Hands and Pearland Neighborhood Center have viable operations. The others seem to have been created with unknown intentions, and currently fail to demonstrate any legitimate

operations are in place towards assisting the homeless, and may have other purposes/functions that are unknown to the City as far as social services are concerned.

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

Rental assistance and mental health services are the perfunctory measures being used to help those facing housing and social services challenges. However, the City also invests in ongoing strategies that aid the mentally-disabled adults that need daily programmatic support for their sustainability, as well as an emerging need to help the elderly with access to daily basic needs (food). The impact of the coronavirus pandemic is major along the lines of the need for assistance to the elderly, as they represent a vulnerable public health risk in the community that should be as socially-distanced as possible from COVID-19. With that said, homebound meal delivery is an exploding resource area that the CDBG program has began to increase its support for, and the anticipation is that a majority of our CDBG Coronavirus Relief funding will have to be spent on this initiative. During this time of employment and economic challenges due to the pandemic, the program's objectives will begin to focus on the ability to help those in need remain in housing and avoid homelessness, receive support for basic sustenance and other needs, and be served with the mental health counseling services that prevent ancillary health factors from being added to the medical health issues that face the community involving COVID-19.

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 local assessment continues to show that no chronic homeless conditions exist in Pearland, to the extent that visible, reported, impediments to housing and independent living exist, that would require CDBG program funding allocations to solve problems.

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

Actions taken to address the needs of public housing

The City of Pearland is not a recipient of public housing funds from HUD, does not operate/function as a Public Housing Authority (PHA), and does not function under the auspices of any previous or current Cooperation Agreement with any of the three (3) counties Pearland is located (Brazoria, Fort Bend, and/or Harris). This section is not applicable to the scope of work involved in meeting our local CDBG goals and objectives.

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

The City of Pearland is not a recipient of public housing funds from HUD, does not operate/function as a Public Housing Authority (PHA), and does not function under the auspices of any previous or current Cooperation Agreement with any of the three (3) counties Pearland is located (Brazoria, Fort Bend, and/or Harris). This section is not applicable to the scope of work involved in meeting our local CDBG goals and objectives.

Actions taken to provide assistance to troubled PHAs

The City of Pearland is not a recipient of public housing funds from HUD, does not operate/function as a Public Housing Authority (PHA), and does not function under the auspices of any previous or current Cooperation Agreement with any of the three (3) counties Pearland is located (Brazoria, Fort Bend, and/or Harris). This section is not applicable to the scope of work involved in meeting our local CDBG goals and objectives.

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 lack of HOME funding, ESG resources, and the inability to spend the very limited CDBG funding Pearland receives on new housing, are all challenges that impact our ability to ameliorate the barriers to affordable housing. The City has continued to work with Brazoria County Housing Authority to ensure that their public housing activities have responsible and manageable operations regarding any impacts on housing in Pearland; specifically, as it relates to those that seek BCHA Section 8 HCVs and/or TBRA support, as there are no public housing units in Pearland.

The City has continued to review LIHTC applications and give positive responses to those applications to the State that are feasible and sound. The City has had to place its owner occupied housing rehabilitation program on hold due to COVID-19, but is in the process of using the available time to make guideline revisions, update application forms and other required documents, and adjust policy to ensure compliance with HUD rules at all times. Still in the aftermath of Hurricane Harvey, both repairs and renovations continue to occur, as well as new home starts for properties that may have been totally decimated by the storm/floods. Fortunately, the City's decisions to temporarily remove certain permitting fees should have assisted in ameliorating cost issues that would be barriers to affordable housing.

It is important to note that Pearland has been notoriously touted as one of the most affordable cities in the country. The low poverty rate, low unemployment, housing affordability, and proximity to job markets all impact the local housing market in an affordability-oriented way. It is also important to note that the City has a relatively young housing stock, and many of its neighborhoods and subdivisions were developed free of the discriminatory restrictive land and housing covenants that were often formed in the early part of the 20th century. Pearland's growth and development, from a housing standpoint, has largely been a result of development that took place in the late 80s and early 90s. Therefore, many housing discrimination policies were uninstituted by the time Pearland began to develop, so housing affordability is also matched with a hefty obstacle to the fair housing issues many older cities face today. The "actions" taken that impact the negative effects of the types of public policies this section calls for the grantee to address have mostly been in the form of "inaction," so as to preserve the original integrity of measures that are originally anti-discriminatory in Pearland.

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

The City is involved in an ongoing effort to improve the accessibility local residents have to social service agency resources. The partnership between the City and Pearland Neighborhood Center is critical along these lines, as it fosters supportive activities that expose the community to available resources. The

annual Neighborhood Forum sponsored and hosted by the PNC provides community based organizations with the ability to share information about the resources available to the public. The long-term plan involves including additional elements to this forum, including but not limited to: volunteer registration, recognition of those making significant contributions to the community, and establishing cooperative working agreements between agencies that have a clear connection to one another, for the purpose of avoiding duplication of services/benefits.

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

The City of Pearland continued its commitment to reducing lead hazards in PY 2022. Every qualified home/household involved in the City's home repair program, built prior to 1978, will have a lead-based paint assessment conducted by a contract lead-paint risk assessor. If the existence of lead-based paint is determined, along with the scope of rehabilitation services for the home, proper lead safe practices will be employed as well as proper remediation. All applicants for rehabilitation, whether qualifying or not, with homes built prior to 1978 and with children in residence will be encouraged to have the child tested for lead poisoning and will be given a copy of the EPA pamphlet "Renovate Right: Important Lead Hazard Information for Families, Child Care Providers and Schools".

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

The 2022 program year provided support for those in need of rental assistance, as well as assistance for those in need of child-care and student after-care services, mainly to sustain employment and/or seek jobs. Pearland Neighborhood Center resumed its role as the perfunctory service provider for rental assistance programming, and a new subrecipient – Gathering Outreach – came into play as a service provider that offers child-care/after-care to low-moderate income households. A total of 21 individuals were served with rental assistance in ten (10) households, with 50 students receiving child-care/aftercare services. Both efforts are examples of how the CDBG funds that come to Pearland help to reduce poverty-level families, as extremely low income households benefit from each of these programs.

In addition, the support for the Forgotten Angels Foundation's Day Hab Center is ongoing via capital investments that have been made over the years, providing alternatives that improve vocational and skill-building capability for extremely low income mentally-disabled adults.

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

Two aspects of compliance in this area of the CAPER are required, generally involving:

- the use of Low-Income Housing [Tax] Credits;
- reduction of lead-based paint hazards;
- reducing the number of poverty-level families;
- enhance coordination between public and private housing and social service agencies;

- address the needs of public housing (including providing financial or other assistance to troubled PHAs); and
- encourage public housing residents to become more involved in management and participate in homeownership.

The Grantee's efforts have emphasized those that have a nexus to its scope of capability, considering the limitations involving its lack of a Public Housing Authority (PHA), lack of public housing, and the related aspects (public housing needs, coordination and involvement of public housing residents, etc.). Pearland has worked to reduce lead-paint hazards via its housing rehabilitation program and plans to build capacity for delivering more inspections of rental housing per increases in delivery of emergency subsistence.

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

The previously instituted measures to enhance coordination between private housing and social service agencies became less intense during PY 2022, largely due to reducing Coronavirus impacts on the community involving rental assistance. Regular meetings between the region's apartment association (Houston Apartment Association), City staff, and the Pearland Neighborhood Center came to a close, as no programming was needed in PY 2022. Rental assistance levels went back to traditional allocations and non-COVID-19 assistance was the method of service delivery in PY 2022. The lack of any public housing in Pearland prevents the City from coordinating any such enhanced coordination, as those entities are outside the City limits and subject to the authority of Brazoria County.

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

In PY 2016, the City updated its Fair Housing Plan, which was approved by City Council with the submission of the current Consolidated Plan. Consistent with previous observations, the following conditions still exist:

- Pearland is a suburban city with limited rental and affordable housing units;
- Pearland does not have a Fair Housing Ordinance;
- The lack of public transportation poses limitations on fair housing choice for those of limited income;
- Some of the apartments in Pearland refuse to accept Section 8 HCV participants from the Brazoria County Housing Authority;
- Pearland does not receive HOME funds and cannot support CHDOs or other providers of affordable housing;
- There is a shortage of Section 3 businesses in the areas in and around Pearland; and
- There is a shortage of public service agencies that are accessible to Pearland residents and

provide assistance to special needs populations and protected classes.

City of Pearland is not a public housing authority or a recipient/manager of State of Texas Section 8 Housing Choice Vouchers. However, four (4) apartment complexes in Pearland are rent-controlled for low-moderate income residents. While unsanctioned to do so, there may be issuances of Section 8 Housing Choice Vouchers taking place for housing residents in these units. The City is not in a position to authorize or restrict these, and does not intend to do either at this time. The properties' subject to these LMI conditions were ostensibly "grandfathered" into doing so within the City limits when Pearland annexed unincorporated areas into its boundaries in the 1990s.

The City is also not a HOME Participating Jurisdiction and no funds have been expended in the City for programs such as assistance for first-time homebuyers or the creation of CHDOs. Affordability impediments were noted and cost burdens were identified in examples of rental housing involving minorities and non-Anglo ethnicities. However, considering the limited overall population of very low income persons in Pearland, these factors mainly affected those in the 50.1-80% MFI range.

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

Monitoring efforts are resuming in PY 2022, as the restrictions and programmatic intensity of addressing COVID-19 priorities has begun to subside. Immediately following the end of PY 2022, the grantee conducted desk reviews of client data files of subrecipients, with a plan to proceed with full-scale overviews of compliance with HUD regulations. In HUD Program Year 2019, the Grantee improved its risk assessment tools, developing and instituting a new monitoring facet to its prior method of simply monitoring all agencies every year. The tool takes into account the last year audited, its spending timeliness, and reporting compliance, resulting in a gross risk assessment, percentage of risk to the whole compendium of assets, and tracking of the monitoring process. The monitoring process inspects agencies' compliance with Section 504, Davis-Bacon Act, environmental review, Civil Rights provisions, and HUD National Objectives, among others. The same exhibits used to monitor the Grantee are used as a guide for monitoring subrecipients. More intense inspections of subrecipients were conducted in the 2022 program year. Counseling Connections for Change and the Pearland Neighborhood Center were the focus of PY 2022 monitoring. Other subrecipient monitoring activities will occur in PY 2023, including City departments that utilize CDBG funds. No unresolved findings were realized in PY 2022 monitoring activities.

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 opened its public comment period on December 14, 2023 and it ended on December 28, 2023. A draft CAPER was made available to the public upon request, as stated in the public notice, and online during the comment period. This comment period provided the public with at least 15 days to make comments about the City's performance where CDBG funding was concerned. No comments were made or submitted during these timeframes.

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.

There is one (1) notable aspect of the City's CDBG program oversight and management that will have an impact on changes in program objectives for PY 2022, which is the subsiding of Coronavirus Pandemic factors and its impact on spending. CDBG programming has begun to resume normalcy, both in the levels of funding allocated to certain types of activities, and the completion of facility improvements that will continue to prevent the spread of COVID-19 on an ongoing basis. The primary action needed to reconcile this change will be an amendment to COVID-19 CDBG funding to promote improvements to facilities that require future social distancing capabilities. The Melvin Knapp (Senior) Center is one that will need expanded space for the purpose of keeping seniors safe if/when a pandemic factor resurges and requires additional space considerations.

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

No

[BEDI grantees] Describe accomplishments and program outcomes during the last year.

Not applicable, as the City has no BEDI considerations/funding.

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.

The major change in community conditions that would purport to the need to change program objectives rests with the changes in pandemic conditions facing the community. With the reduction in COVID-19 concerns, use of funds previously programmed for certain supportive efforts will need to be reallocated to those with more long-term preventative characteristics. In all likelihood, City staff will propose a revision of planned rental assistance funding in the CDBG-CV area to the proposed improvements at the Melvin Knapp Activity (Senior) Center. This change will be made in PY 2023.

In addition, a temporary adjustment to the methodology for providing oversight and management of the housing rehabilitation activities will take place, resulting in more funds being made available for construction and less of a need for administrative costs to be incurred. This will not require a plan amendment, as there is no proposed change in scope and the dollar amounts involved constitute less than 20% of the annual allocation for PY 2023.

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

No

[BEDI grantees] Describe accomplishments and program outcomes during the last year.

CR-58 – Section 3

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

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

Table 8 – Total Labor Hours

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

Table 9 – Qualitative Efforts - Number of Activities by Program

Narrative

The City did not have any PY 2022 CDBG-funded projects or activities that met the applicable regulatory threshold of \$200,000 for Section 3 compliance, nor any aspects of its efforts that would be required per the variety of regulations in 24 CFR 905.604, Lead Hazard Control and Healthy Homes (LHCHH), Sections 501 or 502 of the Housing and Urban Development Act of 1970, the Lead-Based Paint Poisoning Prevention Act, and the Residential Lead-Based Paint Hazard Reduction Act of 1992. However, the City still encourages all of its construction business concerns that are involved in CDBG-funded projects and activities to comply with Section 3.