

**GUIDELINES FOR PREPARING A  
CONSOLIDATED PLAN SUBMISSION  
FOR LOCAL JURISDICTIONS**  
**U.S. Department of Housing and Urban Development  
Office of Community Planning and Development**

## **INTRODUCTION**

The Consolidated Plan is designed to be a collaborative process whereby a community establishes a unified vision for community development actions. It offers local jurisdictions the opportunity to shape the various housing and community development programs into effective, coordinated neighborhood and community development strategies. It also creates the opportunity for strategic planning and citizen participation to take place in a comprehensive context, and to reduce duplication of effort at the local level.

The strategic plan is a specific course of action for revitalization. It is the means to analyze the full local context and the linkages to the larger region. It builds on local assets and coordinates a response to the needs of the community. It integrates economic, physical, environmental, community, and human development in a comprehensive and coordinated fashion so that families and communities can work together and thrive. A strategic plan also sets forth program goals, specific objectives, annual goals, and benchmarks for measuring progress. In so doing, it helps local governments and citizens keep track of results and learn what works.

The Consolidated Plan approach is also the means to meet the submission requirements for the Community Development Block Grant (CDBG), HOME Investment Partnerships (HOME), Emergency Shelter Grant (ESG), and Housing Opportunities for Persons with AIDS (HOPWA) formula programs. This process replaces prior CPD planning and submission requirements with a single document that satisfies the submission requirements of the four CPD formula programs for local jurisdictions.

The statutes for the formula grant programs set forth three basic goals against which the plan and the jurisdiction's performance under the plan will be evaluated by HUD. Each jurisdiction's plan must state how it will pursue these goals for all community development programs, as well as all housing programs. These statutory program goals are:

**DECENT HOUSING** - - which includes:

- assisting homeless persons obtain affordable housing;
- assisting persons at risk of becoming homeless;
- retaining the affordable housing stock;
- increasing the availability of affordable permanent housing in standard condition to low-income and moderate-income families, particularly to members of disadvantaged minorities without discrimination on the basis of race, color, religion, sex, national origin, familial status, or disability;
- increasing the supply of supportive housing which includes structural features and services to enable persons with special needs (including persons with HIV/AIDS) to live in dignity and independence; and

- providing affordable housing that is accessible to job opportunities.

A SUITABLE LIVING ENVIRONMENT - - which includes:

- improving the safety and livability of neighborhoods;
- eliminating blighting influences and the deterioration of property and facilities;
- increasing access to quality public and private facilities and services;
- reducing the isolation of income groups within areas through spatial deconcentration of housing opportunities for lower income persons and the revitalization of deteriorating neighborhoods;
- restoring and preserving properties of special historic, architectural, or aesthetic value; and
- conserving energy resources.

EXPANDED ECONOMIC OPPORTUNITIES - - which includes:

- job creation and retention;
- establishment, stabilization and expansion of small businesses (including micro-businesses);
- the provision of public services concerned with employment;
- the provision of jobs to low-income persons living in areas affected by those programs and activities, or jobs resulting from carrying out activities under programs covered by the plan;
- availability of mortgage financing for low-income persons at reasonable rates using non-discriminatory lending practices;
- access to capital and credit for development activities that promote the long-term economic and social viability of the community; and
- empowerment and self-sufficiency for low-income persons to reduce generational poverty in federally assisted housing and public housing.

At each jurisdiction's discretion, the information can be displayed in any clear, concise format that communicates the key elements of the plan to citizens. These elements include the needs assessment, priority needs, specific objectives, and how the activities address identified needs and objectives. All required elements of the plan (including tables and narratives) should be submitted to HUD in an electronic format. Electronic data assists HUD and its program partners to exchange information more easily and better serves the families and communities that HUD programs are designed to serve.

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## PREPARING A CONSOLIDATED PLAN SUBMISSION

These steps guide the jurisdiction through the process of preparing its consolidated plan and action plan submission to HUD.

### I. Managing the Process

The consolidated plan submission process envisions that housing and community development planning and programming will be accomplished through a unified and comprehensive framework that opens new opportunities for collaboration and collective problem-solving. Partnerships among government agencies and between government and private groups are developed in order to marshal government and private resources to achieve intended public purposes. These steps require jurisdictions to take and/or describe specific actions and initiatives relevant to the preparation of the consolidated plan.

#### Presubmission requirements:

**Required Consultation** - Jurisdictions must consult and coordinate with appropriate public and private agencies, such as the State and other local jurisdictions; public and private agencies that provide assisted housing, health services, and social services agencies including services to children, elderly persons, homeless persons, persons with disabilities (including persons with HIV/AIDS and their families); and other categories of residents, and among its own departments, to assure that its consolidated plan is a comprehensive document and addresses statutory purposes.

**Lead - Based Paint** - The jurisdiction must consult with state and local health and child welfare agencies, and examine data on hazards and poisonings, including health department data on the addresses of housing units in which children have been identified as lead poisoned.

#### Submission Requirements:

**Lead Agency** - The jurisdiction must identify the lead agency or entity for overseeing the development of the plan and the major public and private agencies responsible for administering programs covered by the consolidated plan.

**Consultation/Coordination** - The jurisdiction must identify the significant aspects of the process by which the plan was developed, the agencies, groups, organizations (including businesses, developers, community and faith-based organizations), and others that participated in the process. It must briefly describe the jurisdiction's consultation with housing, health, social service agencies, and other entities, including those focusing on services to children, elderly persons, persons with disabilities, persons with HIV/AIDS and their families, homeless and chronically homeless persons, as well as activities it will undertake to enhance coordination between public and assisted housing providers, and among private and governmental health, mental health, and service agencies. HOPWA grantees must consult broadly to develop a metropolitan-wide

strategy and other jurisdictions must assist in the preparation of the HOPWA submission.

**Institutional Structure** - The jurisdiction must provide a concise summary of the institutional structure through which it will carry out its consolidated plan, including private industry, non-profit organizations, community and faith-based organizations, and public institutions. The jurisdiction must also assess the strengths and gaps in the delivery system.

### **Guidance:**

**Collaboration and Partnership** - In organizing to prepare the consolidated plan submission, has the jurisdiction considered establishing new relationships and organizational structures among various agencies and organizations in order to maximize the benefits that should arise from the collective problem solving and coordinated activities? Does the lead agency that coordinates the consolidated planning and submission process have adequate authority and ability to accomplish the following:

- Develop interagency agreements and coordinating bodies that can facilitate cooperation among the jurisdiction's line agencies?
- Work with other jurisdictions and organizations that have a regional responsibility for economic development, business, employment, and planning?
- Provide continuity of management for the process over time and the confidence of citizen organizations that citizens participating in the process have meaningful access to the decision making process?

**Leadership** -- The consolidated plan should have the clear backing and support of the Mayor or Chief Elected Official. Real cooperation and coordination will not occur without leadership by the jurisdiction's elected officials and citizens will not participate in a process that does not have leadership by elected officials. Leadership also aids in the effective implementation of the plan and increases commitment to the plan.

**Economic Development** -- The consolidated plan should describe efforts to enhance coordination with private industry, businesses, developers, and social service agencies, particularly with regard to the development of the jurisdictions' economic development strategy.

### **Citizen Participation**

The consolidated plan must result from an effective citizen participation process. Existing, ongoing citizen participation activities may be used when they are strong and vital. Jurisdictions have the flexibility to choose the participation process that best works for the low-income citizens who are the primary clients for HUD programs.

The jurisdiction must develop and follow a detailed citizen participation plan that addresses each

of the following elements. Citizens, non-profit organizations and other interested parties must be afforded adequate opportunity to review and comment on the original citizen participation plan, on substantial amendments to the citizen participation plan, and must make the citizen participation plan public.

**Participation** -- The citizen participation plan must provide for and encourage citizens to participate in the development of the consolidated plan, any substantial amendments to the consolidated plan, and the performance report. These requirements are designed especially to encourage participation of low- and moderate- income residents where housing and community development funds may be spent. The jurisdiction is expected to take whatever actions are appropriate to encourage the participation of all its residents, including minorities and non-English speaking persons, as well as persons with disabilities. The jurisdiction shall encourage the participation of local and regional institutions and other organizations (including businesses, developers, community and faith-based organizations) in the process of developing and implementing the consolidated plan.

The jurisdiction shall also encourage the participation of residents of public and assisted housing developments and recipients of tenant-based assistance in the process of developing and implementing the consolidated plan, along with other low-income residents of targeted revitalization areas in which the developments are located. The jurisdiction shall make an effort to provide information to the housing agency about consolidated plan activities related to its developments and surrounding communities that the housing agency can make available at the annual public hearing required for the Public Housing Agency Plan.

**Access to Information** -- Citizens, public agencies, and other interested parties, including those most affected, must have the opportunity to receive information, review and submit comments on any proposed submission concerning the proposed activities, including the amount of assistance the jurisdiction expects to receive (including grant funds and program income), and the range of activities that may be undertaken, including the estimated amount of CDBG and other funds proposed to be used for activities that will benefit persons of low- and moderate-income.

**Anti-displacement** -- The citizen participation plan must set forth the jurisdiction's plans to minimize displacement of persons and to assist any persons displaced, specifying the types and levels of assistance the jurisdiction will make available (or require others to make available) to persons displaced, even if the jurisdiction expects no displacement to occur.

**Publishing the Plan** - The jurisdiction must publish its proposed consolidated plan submission so that affected citizens have sufficient opportunity to review it and provide comments. The requirement for publishing may be met by publishing a summary of the proposed consolidated plan in one or more newspapers of general circulation and making copies of the proposed plan available at libraries, government offices, and public places. The summary must describe the contents and purpose of the consolidated plan, and must include a list of the locations where copies of the entire plan may be examined. The

jurisdiction must also provide a reasonable number of free copies of the plan to citizens and groups that request it.

**Public Hearings** -- The jurisdiction must provide at least two public hearings per year to obtain citizens' views and to respond to proposals and questions, to be conducted at a minimum of two different stages of the program year. Together, the hearings must address housing and community development needs, development of proposed activities, and review of program performance.

In order to obtain the views of citizens on housing and community development needs, including priority nonhousing community development needs, the citizen participation plan must provide that at least one of these hearings is held before the proposed consolidated plan is published for comment.

The citizen participation plan must provide that hearings be held at times and locations convenient to potential and actual beneficiaries, and with accommodation for persons with disabilities. The citizen participation plan must specify how it will meet these requirements.

The citizen participation plan must identify how the needs of non-English speaking residents will be met in the case of public hearings where a significant number of non-English speaking residents can be reasonably expected to participate.

**Notice of Hearings** -- The citizen participation plan must state how and when adequate advance notice will be given to citizens of each hearing (including residents of assisted and public housing) and sufficient information must be published about the subject of the hearing. (Although HUD is not specifying the length of notice required, two weeks is considered adequate. However, publishing small print notices in the newspaper a few days before the hearings does not constitute adequate notice.)

**Access to Meetings** -- The citizen participation plan must provide citizens with reasonable and timely access to local meetings.

**Comments** -- The citizen participation plan must provide a period of not less than 30 days, prior to the submission of the consolidated plan, to receive comments from citizens. The jurisdiction must consider the views of citizens, public agencies and other interested parties in preparing its final consolidated submission.

**Substantial Amendments** -- The citizen participation plan must specify the criteria the jurisdiction will use for determining what changes in the jurisdiction's planned or actual activities constitute a substantial amendment to the consolidated plan. It must include among the criteria for a substantial amendment changes in the use of CDBG funds from one eligible activity to another. The citizen participation plan must provide at least 30 days to receive comments on a substantial amendment before the amendment is implemented. The citizen participation plan shall require the jurisdiction to consider any comments or views of citizens received in writing, or orally at public hearings, if any, in preparing the substantial amendment. A summary of these comment and a summary of

any comments or views not accepted and the reasons therefore, shall be attached to the substantial amendment.

**Performance Reports** -- The citizen participation plan must provide citizens with reasonable notice and an opportunity to comment on performance reports. The citizen participation plan must state how reasonable notice and an opportunity to comment will be given. The citizen participation plan must provide at least 15 days to receive comments on the performance report that is to be submitted to HUD before its submission. The citizen participation plan shall require the jurisdiction to consider any comments or views of citizens received in writing, or orally at public hearings in preparing the performance report. A summary of these comments shall be attached to the performance report.

**Availability to the Public** -- The citizen participation plan must provide that the consolidated plan as adopted, substantial amendments, and the performance report will be available to the public, including the availability of materials in a form accessible to persons with disabilities, upon request. The citizen participation plan must state how these documents will be available to the public.

**Access to Records** -- The citizen participation plan must require the jurisdiction to provide citizens, public agencies, and other interested parties with reasonable and timely access to information and records relating to the jurisdiction's consolidated plan and the jurisdiction's use of assistance under the programs covered by the plan during the preceding five years.

**Technical Assistance** -- The citizen participation plan must provide for technical assistance to groups representative of persons of low- and moderate-income that request such assistance in developing proposals for funding assistance under the consolidated plan.

**Complaints** -- The jurisdiction must describe appropriate and practicable procedures to handle complaints from citizens related to the consolidated plan, amendments, and performance report. At a minimum, the citizen participation plan shall require the jurisdiction to provide a timely, substantive written response to every written citizen complaint, within an established period of time (within 15 days, where practicable, if the jurisdiction is a CDBG grant recipient).

**Amendments** -- Prior to the submission of any substantial change in the proposed use of funds, citizens must have reasonable notice of, and opportunity to comment on, the proposed amendment.

### **Submission Requirements:**

**Executive Summary** -- a clear, concise executive summary that included the objectives and outcomes identified in the plan and an evaluation of past performance.

**Citizen Participation** -- a summary of the citizen participation process, a summary of

citizen comments or views on the plan, and efforts made to broaden public participation in the development of the consolidated plan, including outreach to minorities and non-English speaking persons, as well as persons with disabilities. The summary of citizen comments must include a written explanation of comments not accepted and the reasons why these comments were not accepted.

### **Guidance:**

The plan should include or provide:

**Public Notices** -- for citizen participation through one or more of the following: publication of notices and information in nonlegal sections of major newspapers; in neighborhood, minority, and non-English newspapers; through public service announcements over radio and television; by direct mailings and phone contacts to organizations that have requested it. Notices should be published 14 calendar days prior to a public hearing or a deadline.

**Public Hearings** -- hold hearings and meetings at times and places that are convenient and comfortable for people most affected by the proposal. Hearings or informational meetings should be held on weekends or in the evening preferably near neighborhoods that are targeted for assistance.

**Public Involvement** -- explore alternative public involvement techniques and quantitative ways to measure efforts that encourage citizen participation in a shared vision for change in communities and neighborhoods, and the review of program performance, e.g., use of focus groups, and use of the Internet.

**Availability to the Public** -- provide the proposed and final consolidated plan submission on the Internet so affected citizens have sufficient opportunity to review it and provide comments.

**Technical Assistance** -- consider providing technical assistance for proposals that strengthen and expand the role of community based development organizations in planning retail, commercial, affordable housing and other public improvements.

## **II. Strategic Plan**

The jurisdiction must produce a strategic plan for a period designated by the jurisdiction that brings needs, priority needs, priorities, specific objectives, and strategies together in a coherent strategic plan. In identifying and describing its needs, the jurisdiction is encouraged to draw relevant information from previous submissions and other reports and studies, as appropriate. The strategic plan must be developed to achieve the following statutory goals and objectives, principally for extremely low-, low- and moderate-income residents:

- provide decent housing and
- a suitable living environment and



- expand economic opportunities.

### **Submission Requirements:**

**Time Period** -- The jurisdiction must state the period of time covered by the plan.

**Priority Needs Analysis and Strategies** -- The jurisdiction must indicate the priority needs in accordance with the priority needs tables prescribed by HUD, describe the reasons for assigning the priority given to each category of priority needs, and identify any obstacles to meeting underserved needs. In addition, the jurisdiction must describe the general priorities for allocating investment geographically within the jurisdiction (or within the EMSA for the HOPWA program) and among priority needs and activities. The rationale for establishing relative priority needs should flow logically from this analysis.

**Specific Objectives** -- The jurisdiction's strategic plan must summarize priorities and specific objectives it intends to initiate and/or complete in accordance with the tables prescribed by HUD and how Federal, State, and local public and private sector resources that are reasonably expected to be available will be used to address identified needs for the period covered by the strategic plan. Each specific objective developed to address a priority need, must be identified by number and contain proposed accomplishments and outcomes the jurisdiction expects to achieve in quantitative terms through related activities over a specified the time period (i.e., one, two, three, or more years), or in other measurable terms as identified and defined by the jurisdiction.

The jurisdiction must address the following concerns, preferably through a coordinated strategy:

### **Submission Requirements:**

#### **HOMELESS**

**Homeless Needs** -- The jurisdiction must provide a concise summary of the nature and extent of homelessness in the jurisdiction, (including rural homelessness and chronically homeless persons where applicable), addressing separately the need for facilities and services for homeless persons and homeless families with children, both sheltered and unsheltered, and homeless subpopulations, in accordance with Table 1A. The summary must include the characteristics and needs of low-income individuals and children, (especially extremely low-income) who are currently housed but are at imminent risk of either residing in shelters or becoming unsheltered. In addition, to the extent information is available, the plan must include a description of the nature and extent of homelessness by racial and ethnic group.

**Inventory** -- The jurisdiction shall provide a concise summary of the existing facilities and services (including a brief inventory) that assist homeless persons and families with children and subpopulations identified in Table 1A. These include outreach and assessment, emergency shelters and services, transitional housing, permanent supportive housing, access to permanent housing, and activities to prevent low-income individuals and families with children (especially extremely low-income) from becoming homeless.

The jurisdiction can use the optional Continuum of Care Housing Activity Chart and Service Activity Chart to meet this requirement.

**Priority Homeless Needs** -- Using the results of the Continuum of Care planning process, identify the jurisdiction's homeless and homeless prevention priorities specified in Table 1A. The description of the jurisdiction's choice of priority needs and allocation priorities must be based on reliable data meeting HUD standards and should reflect the required consultation with homeless assistance providers, homeless persons, and other concerned citizens regarding the needs of homeless families with children and individuals. The jurisdiction must provide an analysis of how the needs of each category of residents provided the basis for determining the relative priority of each priority homeless need category.

**Homeless Strategy** -- Describe the jurisdiction's strategy for developing a system to address homelessness and the priority needs of homeless persons and families (including the subpopulations identified in the needs section). The jurisdiction's strategy must consider the housing and supportive services needed in each stage of the process. These include preventing homelessness, outreach/assessment, emergency shelters and services, transitional housing, and helping homeless persons (especially any persons that are chronically homeless) make the transition to permanent housing and independent living. The jurisdiction must also describe its strategy for helping extremely low- and low-income individuals and families who are at imminent risk of becoming homeless.

**Specific Objectives** -- Identify specific objectives developed in accordance with the statutory goals described in section 24 CFR 91.1 that the jurisdiction intends to initiate and/or complete in accordance with the instructions for Table 1C, and how Federal, State, and local public and private sector resources that are reasonably expected to be available will be used to address identified needs for the period covered by the strategic plan. Each specific objective developed to address a priority need, must be identified by number and contain proposed accomplishments and outcomes the jurisdiction expects to achieve in quantitative terms through related activities over a specified time period (i.e., one, two, three, or more years), or in other measurable terms as identified and defined by the jurisdiction.

### **Homeless Guidance:**

**Continuum of Care** -- Jurisdictions are encouraged to standardize similar elements contained in the Consolidated Plan and the Continuum of Care Plan, thereby linking the two documents and reducing duplication of effort, particularly where the Continuum of Care geography is coterminous with the Consolidated Plan geography. The jurisdiction should provide a brief inventory of facilities and services for assisting homeless persons, (including any persons that are chronically homeless), and preventing homelessness. The inventory should include (to the extent information is available to the jurisdiction) an estimate of the number of beds and supportive service programs that are serving people that are chronically homeless. Completing the Continuum of Care and Housing Activity Chart and Service Activity Chart from an appropriate application relevant to the jurisdiction's geography will serve this purpose. Guidance on how this can be done is

included as an attachment to Table 1A, the Continuum of Care Homeless Gap Analysis Chart.

**Homeless Strategy** -- The jurisdiction should describe its strategy for addressing the needs of homeless individuals and families with children and the subpopulations identified in the Homeless Populations and Subpopulations Chart. The strategy should address the need for expansion of Continuum of Care components, including outreach, emergency shelters, transitional housing, permanent supportive housing, and prevention of homelessness. In a narrative, describe the goals, programs, and policy initiatives the community expects to accomplish during the period covered by the strategic plan to address the unmet needs of homeless individuals and families with children, as well as subpopulations.

**Chronic Homelessness** -- The jurisdiction should describe its strategy for eliminating chronic homelessness by 2012, and its planned action steps for addressing the needs of persons that are chronically homeless. This can include barriers to achieving this and should include the jurisdiction's strategy for helping homeless persons make the transition to permanent housing and independent living.

A person that is considered chronically homeless is an unaccompanied homeless individual with a disabling condition who has either been continuously homeless for a year or more or has had at least four episodes of homelessness in the past three years. To be considered chronically homeless, persons must have been sleeping in a place not meant for human habitation (e.g., living on the streets) and/or in an emergency shelter during that time. For the purposes of chronic homelessness, a disabling condition is a diagnosable substance use disorder, serious mental illness, developmental disability, or chronic physical illness or disability, including the co-occurrence of two or more of these conditions. A disabling condition limits an individual's ability to work or perform one or more activities of daily living.

**Discharge Coordination Policy** -- Every jurisdiction receiving McKinney-Vento Homeless Assistance Act Emergency Shelter Grant (ESG), Supportive Housing, Shelter Plus Care, or Section 8 SRO Program funds should develop and implement a "Discharge Coordination Policy, to the maximum extent practicable. Such a policy should include "policies and protocols for the discharge of persons from publicly funded institutions or systems of care (such as health care facilities, foster care or other youth facilities, or correction programs and institutions) in order to prevent such discharge from immediately resulting in homelessness for such persons." The jurisdiction should describe its planned activities to implement a cohesive, community-wide Discharge Coordination Policy and how the community will move toward such a policy.

## **SPECIAL NEEDS POPULATIONS**

**Special Needs Populations** -- The jurisdiction must estimate, to the extent practicable, the number of persons in various subpopulations that are not homeless but may require housing or supportive services, including the elderly, frail elderly, persons with disabilities (mental, physical, developmental, persons with HIV/AIDS and their

families), persons with alcohol or other drug addiction, victims of domestic violence, and any other categories the jurisdiction may specify and describe their supportive housing needs. In addition, HOPWA recipients must identify the size and characteristics of the population with HIV/AIDS and their families that will be served in the metropolitan area.

The jurisdiction can use Table 1B of their Consolidated Plan to help identify these needs. The plan must also describe, to the extent information is available, facilities and services that assist persons who are not homeless but require supportive housing, and programs for ensuring that persons returning from mental and physical health institutions receive appropriate supportive housing. If the jurisdiction plans to use HOME or other tenant based rental assistance to assist one or more of these subpopulations, it must justify the need for such assistance in the plan.

**Priority Needs of Special Needs Populations** -- Identify the priority housing and supportive service needs of persons who are not homeless but require supportive housing, i.e., elderly, frail elderly, persons with disabilities (mental, physical, developmental, persons with HIV/AIDS and their families), persons with alcohol or other drug addiction by using Table 1B.

**Specific Objectives** -- Identify specific objectives developed in accordance with the statutory goals described in section 24 CFR 91.1 that the jurisdiction intends to initiate and/or complete in accordance with instructions for Table 1C, and how Federal, State, and local public and private sector resources that are reasonably expected to be available will be used to address identified needs for the period covered by the strategic plan.

Each specific objective developed to address a priority need, must be identified by number and contain proposed accomplishments and outcomes the jurisdiction expects to achieve in quantitative terms through related activities over a specified time period (i.e., one, two, three, or more years), or in other measurable terms as identified and defined by the jurisdiction.

## HOUSING

**Housing Needs** -- The jurisdiction must provide an estimate of housing needs projected for the next five-year period. This includes an estimate of the number and type of families in need of housing assistance for extremely low-income, low-income, moderate-income, and middle-income families, for renters and owners; and the specification of such needs for different categories of persons, including elderly persons; single persons; large families; public housing residents; families on the public housing and section 8 tenant-based waiting list; persons with HIV/AIDS and their families; victims of domestic violence, dating violence, sexual abuse and stalking; persons with disabilities; and a discussion of specific housing problems, including cost-burden, severe cost-burden, substandard housing, and overcrowding (especially large families) experienced by extremely low-income, low-income, and moderate-income renters and owners compared to the jurisdiction as a whole.

Housing data included in this portion of the plan shall be based on U.S. Census data as

provided by HUD and updated by any properly conducted local study, or any other reliable source that the jurisdiction clearly identifies. Jurisdictions may wish to refer to the CHAS data at: <http://socds.huduser.org/scripts/odbic.exe/chas/index.htm> in preparing their narrative. To the extent that any racial or ethnic group has a disproportionately greater need for any income category in comparison to the needs of that category as a whole, the jurisdiction must complete an assessment of that specific need. For this purpose, disproportionately greater need exists when the percentage of persons in a category of need who are members of a particular racial or ethnic group is at least ten percentage points higher than the percentage of persons in the category as a whole.

**Priority Housing Needs** -- The jurisdiction must include the priority housing needs table (Table 2A) prescribed by HUD and describe the rationale for establishing the allocation of funds made available for each priority need category, particularly among extremely low-income, low-income, and moderate-income households. These categories correspond with special tabulations of U.S. census data provided by HUD for the preparation of the Consolidated Plan. The jurisdiction must provide an analysis of how the characteristics of the housing market and the severity of housing problems and needs of each category of residents provided the rationale for establishing the allocation priorities and use of funds made available for rental assistance, production of new units, rehabilitation of existing units (including preserving affordable housing units that may be lost from the assisted housing inventory for any reason). The plan should be explicit about what the jurisdiction plans to do with formula grant funds in the context of their larger strategy. Family and income types may be grouped in the case of closely related categories of residents where the analysis would apply to more than one family or income type.

**Market Analysis** -- Based on information available to the jurisdiction the consolidated plan must describe the significant characteristics of the housing market in terms of supply, demand, condition, and the cost of housing; the housing stock available to serve persons with disabilities; and to serve persons with HIV/AIDS and their families. Data on the housing market should include, to the extent information is available, an estimate of the number of vacant or abandoned buildings and whether units in these buildings are suitable for rehabilitation. The jurisdiction must identify and describe any area of low-income concentration and any area of minority concentration either in a narrative or one or more maps, stating how it defines the terms “area of low-income concentration” and “area of minority concentration”. The jurisdiction shall also include a description of its number and targeting (income level and type of household served) of units currently assisted by local, state, or federally funded programs, and an assessment of whether any such units are expected to be lost from the assisted housing inventory for any reason, (i.e. expiration of Section 8 contracts).

**Specific Housing Objectives** -- Identify specific objectives developed in accordance with the statutory goals described in section 24 CFR 91.1 that the jurisdiction intends to initiate and/or complete in accordance with instructions for Table 2C. Each specific housing objective must be identified by number, contain proposed accomplishments and outcomes the jurisdiction hopes to achieve in quantitative terms over a specified time period (i.e., one, two, three, or more years), or in other measurable terms as identified

and defined by the jurisdiction. Specific housing objectives must describe how funds that are reasonably expected to be available will be used to address identified needs for the period covered by the strategic plan and separately indicate the number of extremely low-income, low-income, and moderate-income families assisted for whom it will provide affordable rental and homeownership housing with Federal funds over a specific time period according to the standards in section 215 of Title II of the National Affordable Housing Act of 1990, as amended.

The housing strategy must indicate how the characteristics of the housing market will influence the use of funds made available for rental assistance, production of new units, rehabilitation of old units, or acquisition of existing units. Please note, the goal of affordable housing is not met by beds in nursing homes. If the jurisdiction intends to use HOME funds for tenant-based rental assistance, it must specify local market conditions that led to the choice of that option.

**Needs of Public Housing** -- In cooperation with the public housing agency or agencies located within its boundaries, the plan must provide a concise summary of the needs of public housing, including identifying the public housing developments in the jurisdiction, the number of public housing units in the jurisdiction, the physical condition of such units, the restoration and revitalization needs of public housing projects within the jurisdiction, and other factors, including the number of families on public housing and tenant-based waiting lists and results from the Section 504 needs assessment of public housing projects located within its boundaries (i. e. assessment of needs of tenants and applicants on waiting list for accessible units as required by 24 CFR 8.25). The public housing agency and jurisdiction can use optional Table 4 of the Consolidated Plan to identify priority public housing needs to assist in this process.

**Public Housing Strategy** -- Provide a concise summary of the public housing agency's strategy to serve the needs of extremely low-income, low-income, and moderate-income families residing in the jurisdiction served by the public housing agency (including families on the public housing and section 8 tenant-based waiting list), the public housing agency's strategy for addressing the revitalization and restoration needs of public housing projects within the jurisdiction and improving the management and operation of such public housing, and the public housing agency's strategy for improving the living environment of extremely low-income, low-income, and moderate families residing in public housing. The jurisdiction must also provide a concise summary of the manner in which the plan of the jurisdiction will help address the needs of public housing, including the need to increase the number of accessible units where required by a Section 504 Voluntary Compliance Agreement, and activities it will undertake to encourage public housing residents to become more involved in management and participate in homeownership. If the public housing agency is designated as "troubled" by HUD or otherwise is performing poorly, the jurisdiction shall describe the manner in which it will provide financial or other assistance in improving its operations to remove such designation.

**Lead-Based Paint Needs** -- The jurisdiction must estimate the number of housing units that contain lead-based paint hazards, as defined in section 1004 of the Residential Lead-

Based Paint Hazard Reduction Act of 1992, and are occupied by extremely low-income, low-income, and moderate-income families. Briefly describe the actions that will take place to evaluate and reduce the number of housing units containing lead-based paint hazards, how the plan for the reduction of lead-based hazards is related to the extent of lead poisoning and hazards, and describe how lead based hazard reduction will be integrated into housing policies and programs.

**Barriers to Affordable Housing** -- This section requires the jurisdiction to explain whether the cost of housing or the incentives to develop, maintain, or improve affordable housing are affected by public policies, particularly those of the local jurisdiction. Such policies include tax policy affecting land and other property, land use controls, zoning ordinances, building codes, fees and charges, growth limits, and policies that affect the return on residential investment.

Identify the strategy to remove or ameliorate negative effects of public policies that serve as barriers to affordable housing, except that, if a State requires a unit of general local government to submit a regulatory barrier assessment that is substantially equivalent to the information required under this part, as determined by HUD, the unit of general local government may submit that assessment to HUD and it shall be considered to have complied with this requirement.

**Fair Housing** -- The jurisdictions were required to complete an analysis of impediments to fair housing choice within one year of the effective date of the consolidated plan rule (February 6, 1995). The analysis was not required to be submitted as part of the consolidated plan, but the jurisdiction must certify that it completed the analysis, is taking appropriate actions to overcome the effects of any impediments identified through that analysis, and maintains records reflecting the analysis and actions in this regard.

**Antipoverty Strategy** -- Provide a summary of the jurisdiction's goals, programs, and policies for reducing the number of poverty level families (as defined by the Office of Management and Budget and revised annually). In consultation with other appropriate public and private agencies, (i.e. TANF agency) state how the jurisdiction's goals, programs, and policies for producing and preserving affordable housing set forth in the housing component of the consolidated plan will be coordinated with other programs and services for which the jurisdiction is responsible. In addition, the jurisdiction must identify the extent to which this strategy will reduce (or assist in reducing) the number of poverty level families, taking into consideration factors over which it has control.

**Monitoring** -- Describe the standards and procedures it will use to monitor its housing and community development activities and ensure long-term compliance with program requirements and comprehensive planning requirements.

## COMMUNITY DEVELOPMENT

**Priority Non-housing Community Development Needs** -- Identify the jurisdiction's priority non-housing community development needs eligible for assistance by CDBG eligibility category specified in Table 2B, (i.e., public facilities, public improvements,

public services and economic development).

**Community Development Objectives** -- Identify specific long-term and short-term community development objectives (including economic development activities that create jobs), developed in accordance instructions for Table 2C and the primary objective of the CDBG program to provide decent housing and a suitable living environment and expand economic opportunities, principally for low- and moderate-income persons.

Each specific objective developed to address a priority need, must be identified by number and contain proposed accomplishments and outcomes the jurisdiction expects to achieve in quantitative terms through related activities over a specified time period (i.e., one, two, three, or more years), or in other measurable terms as identified and defined by the jurisdiction.

### **Guidance:**

**Strategic Vision for Change** -- If the jurisdiction is developing a long-term program for significant change in its community, has it engaged in a process that will develop a comprehensive vision of its desired future? How does the vision make the community and its target neighborhoods more livable, better functioning, and more attractive? Does it integrate economic, physical, environmental, community, and human development in a comprehensive and coordinated fashion so that families and communities can work together and thrive? Does it improve the availability/accessibility, affordability, sustainability of decent housing, a suitable living environment, or expand economic opportunity?

**Barriers to Affordable Housing** -- The removal of regulatory barriers to affordable housing has also become a top Administration priority resulting in the creation of the America's Affordable Communities Initiative and a Regulatory Barriers Clearinghouse for sharing ideas on barrier removal. More information about America's Affordable Communities Initiative is available at [www.hud.gov/affordablecommunities](http://www.hud.gov/affordablecommunities). The Regulatory Barriers Clearinghouse is available at: <http://regbarriers.org>. HUD Form 27300, used for competitive grants, can serve as a useful guidance document in assisting jurisdictions identify the specific policies, procedures or process that impact the cost of developing, maintaining or improving affordable housing.

**Neighborhood Revitalization Strategy Areas** -- Jurisdictions are strongly encouraged to develop neighborhood revitalization strategies that include outcomes that measure the economic empowerment of low- and moderate-income persons, increases in homeownership and property values. Jurisdictions may, upon HUD approval of the strategy, obtain greater flexibility in the use of CDBG funds in the revitalization area(s). See Attachment for instructions on qualifying neighborhood revitalization strategy areas.

**Specific Housing Objectives** -- Jurisdictions are encouraged to identify specific housing objectives that promote the availability/accessibility, affordability, and sustainability of housing by expanding the supply of affordable housing, improving the quality of housing, and increasing access to affordable housing for renters and owners through



activities involving the production of new units, the rehabilitation of existing units, the acquisition of existing units, rental assistance, and homebuyer assistance. Jurisdictions are also encouraged to identify specific objectives for increasing minority homeownership.

**Identifying Benchmarks** -- Benchmarks establish specific targets on the road to achieving goals and carrying out strategies. They are essential for purposes of accountability and measuring success. A benchmark charts the progress from the baseline of the present condition to the achievement of the goal. For example, a community may identify the revitalization of a certain neighborhood as part of its vision, and may include proposed performance measures related to reduction in crime rates, increase in property values, education attainment, or infant mortality rates. Progress towards these goals could be tracked in terms that measure outcomes as well as process and outputs. In this way, the grantee and its citizens would know if the selected activities and strategies are achieving the desired outcome, i.e. a revitalized neighborhood. HUD Form 96010, used for competitive grants, can serve as a useful guidance document in assisting jurisdictions identify and track outputs, benchmarks, and outcomes.

**Public Housing** -- Has the jurisdiction provided examples of supportive efforts to revitalize neighborhoods surrounding public housing projects (either current or proposed); cooperation in the provision of resident programs and services; coordination of local drug elimination or anti-crime strategies; upgrading of police, fire, schools, and other services; and economic development activities in or near public housing projects that expand economic opportunity or tie in with self-sufficiency efforts for residents.

**Mapping Data** -- Has the jurisdiction mapped the data to identify the geographic areas in which concentrations of various housing needs, community development needs and homeless needs and facilities overlap? Similarly, has the jurisdiction mapped the location of essential human services, recreational activities and other amenities to help illustrate whether existing services and facilities are convenient and accessible to various populations?

**Metropolitan/Regional Connections** -- Clear connections should be established between communities, neighborhoods, and the larger metropolitan region. Does the jurisdiction's strategic plan connect its actions to the larger economic strategies for the metropolitan region? Does the plan reference the plans of other agencies that have responsibilities for metropolitan economic development, transportation, and workforce investment?

**Needs of Special Populations** -- Does the strategy include efforts to provide housing or supportive services for persons with special needs, such as the elderly, frail elderly, persons with severe mental illness, the developmentally disabled, physically disabled, persons with alcohol or other drug addiction, or persons with HIV/AIDS and their families?

### III. Consolidated Action Plan

In this section, the jurisdiction must provide a concise summary of the actions, activities, and programs that will take place during the next year to address the priority needs and specific objectives identified by the strategic plan. The action plan, that is submitted annually, must identify the linkage between the use of federal resources and the specific objectives developed to address priority needs identified in the strategic plan. This can be demonstrated by listing the related activity under each specific objective, identifying the activity numbers that support each specific objective, or by identifying the specific objective the related activity supports. The grantees are required to identify all programs and identify all resources during that particular program year. Table 3C contains a tabular format for listing the projects that will take place during the program year.

### **Submission Requirements:**

#### **Action Plan Elements**

**A. Sources of Funds** -- Identify the private and public resources the jurisdiction expects to receive to address priority needs and specific objectives identified in the strategic plan. The plan must provide a concise summary of the amounts allocated under HUD formula grant programs, program income the jurisdiction expects to receive during the program year, and proceeds from Section 108 loan guarantees that will be used during the year to address the priority needs and specific objectives identified in its strategic plan. The plan should include Section 8 funds made available to jurisdictions and Low-Income Housing Tax Credits. For homeless programs, include the McKinney-Vento Homeless Assistance Act programs, other special federal, State and local and private funds targeted to homeless individuals and families, and persons that are chronically homeless. The jurisdiction must explain how federal funds will leverage resources from private and non-federal public sources, and a description of how matching requirements of HUD programs will be satisfied. Where the jurisdiction deems it appropriate, it may indicate publicly owned land or property located within the jurisdiction that may be used to carry out the plan.

**B. Statement of Specific Annual Objectives** -- The jurisdiction's action plan must contain a summary of the priorities and specific annual objectives to be addressed during the next program year. The plan must describe how the formula grant funds and program income the jurisdiction expects to receive during the program year will be used to address identified needs during the forthcoming program year. Each specific objective developed to address a priority need must be identified by number, contain proposed accomplishments and outcomes the jurisdiction expects to achieve in quantitative terms through related activities during the specified time period, or in other measurable terms as identified and defined by the jurisdiction. This information must be presented in accordance with the instructions for Table 3A.

**C. Description of Activities** -- The action plan must provide a concise summary of the eligible programs or activities that will take place during the program year to address the priority needs and specific objectives identified in the strategic plan. The description of programs or activities shall estimate the number and type of families (including income level) that will benefit from the proposed use of funds, and identify the specific local

objectives and priority needs that will be addressed. The action plan must also indicate the number and type of proposed accomplishments the jurisdiction hopes to achieve and a target date for completion of the activity. This information must be presented in accordance with the instructions for Table 3C.

**D. Outcome Measures** -- The action plan must provide outcome measures for activities included in its action plan in accordance with the Federal Register Notice, dated March 7, 2006.

**E. Allocation Priorities and Geographic Distribution** -- The action plan must describe the reasons for the allocation priorities, identify the geographic areas of the jurisdiction (including areas of low-income and minority concentration) in which it will direct assistance during the program year, and identify any obstacles to addressing underserved needs. Where appropriate, jurisdictions should also estimate the percentage of funds the jurisdiction plans to dedicate to target areas.

**F. Annual Affordable Housing Goals** -- The action plan must specify one-year goals for the number of homeless, non-homeless, and special-needs households to be provided affordable housing using funds made available to the jurisdiction, and one-year goals for the number of households to be provided affordable housing through activities that provide rental assistance, production of new units, rehabilitation of existing units, or acquisition of existing units using funds made available to the jurisdiction. The term affordable housing shall be as defined in 24 CFR 92.252 for rental housing and 24 CFR 92.254 for homeownership. This information must be presented in accordance with the instructions for Table 3B.

**G. Homeless and Other Special Populations** -- The jurisdiction must identify the activities to address emergency shelter and transitional housing needs of homeless individuals and homeless families with children (including the subpopulations), to prevent low-income individuals and families with children (especially extremely low-income) from becoming homeless, to help homeless persons (especially persons that are chronically homeless) make the transition to permanent housing and independent living, and specific action steps to end chronic homelessness. The jurisdiction must also identify activities to address the special needs of persons who are not homeless but require supportive services, such as persons with disabilities and persons living with HIV/AIDS and their families (required for HOPWA recipients).

**H. Needs of Public Housing** -- The jurisdiction must identify the manner in which the plan of the jurisdiction will address the needs of public housing during the program year. If the public housing agency is designated as "troubled" by HUD or otherwise is performing poorly, the jurisdiction shall describe the manner in which it will provide financial or other assistance to improve the operations of the public housing agency to remove such designation.

**I. Antipoverty Strategy** -- Briefly describe the actions it plans to take during the next year to reduce the number of poverty level families (as defined by the Office of Management and Budget and revised annually), taking into consideration factors over

which the jurisdiction has control.

**J. Lead-Based Paint Hazards** -- Briefly describe the actions that will take place during the next year to evaluate and reduce the number of housing units containing lead-based paint hazards in order to increase the inventory of lead-safe housing available to extremely low-income, low-income, and moderate-income families, and how the plan for the reduction of lead-based hazards is related to the extent of lead poisoning and hazards.

**K. Other Actions** -- The jurisdiction must briefly describe actions that will take place during the next year to address obstacles to meeting underserved needs, foster and maintain affordable housing, remove barriers to affordable housing, develop institutional structure, enhance coordination between public and private housing, health, and social service agencies, encourage public housing residents to become more involved in management and participate in homeownership.

**L. Monitoring** -- The jurisdiction must briefly describe actions that will take place during the next year to monitor its housing and community development activities and to ensure long-term compliance with program requirements and comprehensive planning requirements. Program requirements include appropriate regulations and statutes of the programs involved, including steps being taken to review affordable housing activities, ensure timeliness of expenditures, on-site inspections it plans to determine compliance with housing codes, and actions to be taken to monitor its subrecipients.

### **Specific CDBG Submission Requirements:**

**Sources of Funds** -- CDBG resources must include the following in addition to the annual grant:

1. Program income expected to be received during the program year, including:
  - (a) the amount expected to be generated by and deposited to revolving loan funds;
  - (b) the total amount expected to be received from each new float-funded activity included in this plan; and
  - (c) the amount expected to be received during the current program year from a float-funded activity described in a prior statement or plan.

NOTE: Amounts described in a prior statement or plan are not to be included in the amount programmed for use in the current plan as they were programmed for use in the statement or plan that first included the float-funded activity generating them.

2. Program income received in the preceding program year that has not been included in a statement or plan;
3. Proceeds from Section 108 loan guarantees that will be used during the year to address the priority needs and specific objectives identified in its strategic plan.

4. Surplus funds from any urban renewal settlement for community development and housing activities; and
5. Any grant funds returned to the line of credit for which the planned use has not been included in a prior statement or plan.

**Float-funded activities** -- If a jurisdiction intends to carry out a new CDBG float-funded activity, the jurisdiction's plan must include the following information:

1. For the program income included in 1(b) above, the jurisdiction should identify the month(s) and year(s) in which the program income will be received; and which of the following options it will take for each float-funded activity to address the risk that the activity may fail to generate adequate program income:
  - (i) amend or delete activities in an amount equal to any amount due from default or failure to produce sufficient income in a timely manner. (If this option is chosen, the action plan must include a description of the process it will use to select activities to be amended or deleted and how it will involve citizens in that process), OR
  - (ii) obtain an irrevocable line of credit from a commercial lender for the full amount of the float-funded activity. (If this option is chosen, information on the float-funded activity in the action plan must include the lender and the terms of the irrevocable line of credit), OR
  - (iii) agree to transfer general local government funds to the CDBG line of credit in the full amount of any default or shortfall within 30 days of the float-funded activity's failure to generate projected program income on schedule.
2. For each float-funded activity for which program income is included in 1(c) under Sources of Funds above, the jurisdiction must identify the prior statement or plan in which the planned use has already been described.

**Program Benefit and Location** -- The plan shall identify the estimated amount of CDBG funds that will be used for activities that benefit persons of low- and moderate-income. The information about activities in the action plan must be identified in sufficient detail, including geographic location if available, to allow citizens to determine the degree to which they may be affected. If the location of a specific activity is not known or is confidential, the jurisdiction should identify the general area or activity. For activity for which the jurisdiction has not yet decided on a specific location, such as when the jurisdiction is allocating an amount of funds to be used for making loans or grants to businesses or for residential rehabilitation, the description shall identify who may apply for the assistance, the process by which the grantee expects to select who will receive the assistance (including selection criteria), and how much and under what terms the assistance will be provided.

**Contingency** -- A jurisdiction must identify activities planned with respect to all CDBG funds expected to be available during the program year, except that an amount generally not to exceed

ten percent of such total available CDBG funds may be excluded from the funds for which eligible activities are described if it has been identified as a contingency for cost overruns.

**Urgent needs** -- An "urgent need" activity may be included in the action plan only if the jurisdiction certifies that the activity is designed to meet other community development needs having a particular urgency because existing conditions pose a serious and imminent threat to the health or welfare of the community and other financial resources are not available.

### **Specific HOME Submission Requirements:**

**Resale/Recapture Provisions** -- For homeownership activities, the participating jurisdiction must describe its resale or recapture guidelines that ensure the affordability of units acquired with HOME and/or American Dream Downpayment Initiative funds. See 24 CFR 92.254(a)(4).

**HOME Tenant-Based Rental Assistance** -- The participating jurisdiction must describe the local market conditions that led to the use of a HOME funds for tenant based rental assistance program. If the tenant based rental assistance program is targeted to or provides a preference for a special needs group, that group must be identified in the Consolidated Plan as having an unmet need and show the preference is needed to narrow the gap in benefits and services received by this population.

**Other Forms of Investment** -- If a participating jurisdiction intends to use forms of investment other than those described in 24 CFR 92.205(b), the jurisdiction must describe these forms of investment.

**Affirmative Marketing** -- The participating jurisdiction must describe the policy and procedures it will follow to affirmatively market housing containing five or more HOME-assisted units. (See 24 CFR 92.351(a)).

**Minority/Women's Business Outreach** -- The participating jurisdiction must describe actions taken to establish and oversee a minority outreach program within its jurisdiction to ensure inclusion, to the maximum extent possible, of minority and women, and entities owned by minorities and women, including without limitation, real estate firms, construction firms, appraisal firms, management firms, financial institutions, investment banking firms, underwriters, accountants, and providers of legal services, in all contracts, entered into by the participating jurisdiction with such persons or entities, public and private, in order to facilitate the activities of the participating jurisdiction to provide affordable housing under the HOME program or any other Federal housing law applicable to such jurisdiction. (See 24 CFR 92.351.(b))

**Refinancing** -- If a jurisdiction intends to use HOME funds to refinance existing debt secured by multifamily housing that is rehabilitated with HOME funds, it must state its financing guidelines required under 24 CFR 92.206(b).

**American Dream Downpayment Initiative** – If a jurisdiction intends to use American Dream Downpayment Initiative (ADDI) funds to increase access to homeownership, it must provide the following information:

- (1) a description of the planned use of the ADDI funds;
- (2) a plan for conducting targeted outreach to residents and tenants of public and manufactured housing and to other families assisted by public housing agencies, for the purposes of ensuring that the ADDI funds are used to provide downpayment assistance for such residents, tenants, and families; and
- (3) a description of the actions to be taken to ensure the suitability of families receiving ADDI funds to undertake and maintain homeownership, such as provision of housing counseling to homebuyers.

**Minority Homeownership** – HUD has established a national goal to increase the number of minority homeowners by 5.5 million by 2010. Since HOME and ADDI are important components of this effort, jurisdictions are now required to include in their Consolidated Plan submissions, an estimate of the total number of minority households expected to be assisted in becoming homeowners during the period covered by the Consolidated Plan. It will not be necessary to establish separate Consolidated Plan goals for HOME and ADDI for homebuyer assistance. A single set of goals may be provided, since by regulation and for Consolidated Plan purposes, ADDI is considered as part of the HOME program.

#### **Specific ESG Submission Requirements:**

The jurisdiction must briefly describe the process and criteria for awarding its grant funds along with the source and amount of matching funds.

#### **Specific HOPWA Submission Requirements:**

A city applicant for an EMSA must briefly describe how the proposed activities will be used to meet the urgent needs of persons with HIV/AIDS and their families that are not being addressed by public and private resources within the metropolitan area, the public and private resources expected to be made available in connection with the proposed activities being funded, and the method of selecting project sponsors (including providing full access to grassroots faith-based and other community organizations) for activities in the metropolitan area, including areas not within the boundaries of the applicant city.

**HIV/AIDS Housing Goals** -- Jurisdictions receiving HOPWA funds must identify annual goals for the number of households to be provided with housing through activities that provide short-term rent, mortgage and utility assistance payments to prevent homelessness of the individual or family, tenant-based rental assistance; and units provided in housing facilities that are being developed, leased or operated. See CAPER charts at: <http://www.hud.gov/offices/cpd/aidshousing/programs/2006reportingreqs.cfm>

for useful guidance document that helps jurisdictions identify and track outputs and outcomes.

**Guidance:**

**Impediments to Fair Housing Choice** -- As part of the certification to affirmatively further fair housing, jurisdictions were required to complete an analysis of impediments to fair housing choice and to take actions to overcome the effects of any impediments identified through that analysis. Jurisdictions are strongly encouraged to annually update their analysis of impediments and to include planned actions to overcome the effects of any impediments identified through that analysis in the annual action plan submission.

**Performance Measurement Systems** -- In addition to outputs, jurisdictions are strongly encouraged to develop performance measurement systems that contain proposed and actual outcomes. See CPD Notice 03-09 and the Federal Register Notice, dated March 7, 2006, for guidance regarding performance measurement systems.

**Neighborhood Strategy Areas** -- Studies indicate concentrated investments have a greater impact neighborhood stabilization and revitalization. Jurisdictions are encouraged to identify geographic areas where the jurisdiction will concentrate the use block grant funds and other local actions in a coordinated manner to achieve local objectives and desired outcomes, i.e., increased homeownership and property values, reduction in crime rates, code enforcement, etc.



## Priority Needs Summary Tables

### **General Information:**

These tables are to be used to identify the priority (including the relative priority if any) given to each category of needs for the period of time designated in the strategic plan portion of this document.

### **Table 1A**

#### **Homeless Gap Analysis and Homeless Population/Subpopulation Chart Instructions**

A jurisdiction must provide a complete description of the sources and methods used to generate the data addressing, where appropriate, the following: (a) when the study was conducted; (b) who did the study; (c) the study's purpose(s); (d) geographical area(s) covered; (e) time period of data collection (e.g., one night, over a week's time); (f) locations included (shelter-type facilities, service facilities, non-facility locations, such as streets, parks); and (g) corrections made for possible duplicate counting.

If the jurisdiction is unsure about whether its counting methods meet HUD's standards, it may contact the local Office of Community Planning and Development.

#### **Continuum of Care Housing Gap Analysis Chart:**

This required chart represents the need for additional emergency, transitional housing and permanent supportive housing resources. The estimated unmet need is based upon the status of the inventory at a point-in-time (one-day) and takes into account both existing beds and funded new beds that are not yet ready for occupancy but are under development.

**Current Inventory:** Enter the number of existing beds currently serving the community. This includes only beds currently available for occupancy.

**Under Development:** Enter the number of funded beds not ready for occupancy but under development.

**Unmet Need/Gap:** Enter the number of beds determined to be the unmet need for each category.

#### **Continuum of Care Homeless Population and Subpopulation Chart:**

Completing Part 1: Homeless Population. This required chart must be completed using statistically reliable, unduplicated counts or estimates of homeless persons in sheltered and unsheltered locations at a one-day point in time. The counts must be from: **(A)** administrative records, **(N)** enumerations, **(S)** statistically reliable samples, or **(E)** estimates. The quality of the data presented in each box must be identified as: **(A), (N), (S) or (E)**.

**Completing Part 2: Homeless Subpopulations.** This must be completed using statistically

reliable, unduplicated counts or estimates of homeless persons in sheltered and unsheltered locations at a one-day point in time. The numbers must be from: **(A)** administrative records, **(N)** enumerations, **(S)** statistically reliable samples, or **(E)** estimates. The quality of the data presented in each box must be identified as: **(A), (N), (S) or (E)**.

**Sheltered Homeless.** Count adults, children and youth residing in shelters for the homeless. “Shelters” include all emergency shelters and transitional shelters for the homeless, including domestic violence shelters, residential programs for runaway/homeless youth, and any hotel/motel/apartment voucher arrangements paid by a public/private agency because the person or family is homeless. **Do not count:** (1) persons who are living doubled up in conventional housing; (2) formerly homeless persons who are residing in Section 8 SRO, Shelter Plus Care, SHP permanent housing or other permanent housing units; (3) children or youth, who because of their own or a parent’s homelessness or abandonment, now reside temporarily and for a short anticipated duration in hospitals, residential treatment facilities, emergency foster care, detention facilities and the like; and (4) adults living in mental health facilities, chemical dependency facilities, or criminal justice facilities.

**Unsheltered Homeless.** Count adults, children and youth sleeping in places not meant for human habitation. Places not meant for human habitation include streets, parks, alleys, parking ramps, parts of the highway system, transportation depots and other parts of transportation systems (e.g. subway tunnels, railroad car), all-night commercial establishments (e.g. movie theaters, laundromats, restaurants), abandoned buildings, building roofs or stairwells, chicken coops and other farm outbuildings, caves, campgrounds, vehicles, and other similar places.

### **Table 1B** **Special Needs (Non-Homeless) Populations**

#### **General Instructions:**

To the degree practicable, give your best estimate of the unmet needs of special need populations for each sub-populations of the non-homeless persons during the time designated in the strategic plan. In addition to the listed sub-populations you can add other groups in need.

**Priority Need Level Column:** Choose the priority for allocating investment to each category of housing need (if any). Designation of the relative priority is optional. If the following definitions of “high”, “medium”, and “low” priority are not used, please describe the manner in which the priorities for allocating investment are identified. For example, you can indicate a priority with a check mark, a “Y” for “Yes”, a “N” for “No”.

**Unmet Priority Need:** To the degree practicable, jurisdictions should enter the best estimate of the unmet need for supportive housing or services. Data may be calculated from administrative record keeping, enumerations, statistically reliable samples, or other sources.

**Estimated \$ Column:** To the degree practicable, jurisdictions should enter the estimated dollar amount required to properly address the need.

**Goals:** Enter the 3-5 year housing goals identifying the non-homeless number of people with

special needs the jurisdiction expects to serve during the period of time designated in the strategic plan component of this document.

**Line item instructions:**

**Elderly:** Enter the best estimate of unmet need and the estimated dollar amount required to address the needs of elderly persons that are not homeless but need supportive housing or services.

**Frail Elderly:** Enter the best estimate of unmet need and the estimated dollar amount required to address the needs of frail elderly persons that are not homeless but need supportive housing or services.

**Severe mental illness only:** Enter the best estimate of unmet need and the estimated dollar amount required to address the needs of severe mentally ill persons that are not homeless but need supportive housing or services.

**Developmentally disabled:** Enter the best estimate of unmet need and estimated dollar amount required to address the needs of developmentally disabled persons that are not homeless but need supportive housing or services.

**Physically disabled:** Enter the best estimate of unmet need and estimated dollar amount of required to address the needs of physically disabled persons that are not homeless but need supportive housing or services.

**Alcohol/other drug addiction only:** Enter the best estimate of unmet need and estimated dollar amount required to address the needs of persons with alcohol/other drug addiction that are not homeless but need supportive housing or services.

**HIV/AIDS:** Enter the best estimate of unmet need and estimated dollar amount required to address the needs of persons with HIV/AIDS that are not homeless but need supportive housing or services. (This is required for HOPWA recipients.)

**Victims of Domestic Violence:** Enter the best estimate of unmet need and estimated dollar amount required to address the needs of victims of domestic violence that are not homeless but need supportive housing or services.

**Other:** Specify by entering the description, priority need level and estimated dollar amount.

**Table 1C**  
**Summary of Specific Multi-Year Objectives**  
**Homeless and Special Needs**

**Specific Objective #:** Identify each specific multi-year objective with a unique number. For example, DH-1.1, DH-1.2, DH-1.3 for specific objectives that correspond with the category availability/accessibility of decent housing.

**Specific Objectives:** Identify the specific, measurable objective(s) under each general outcome/objective category. List specific objectives that are supported by the use of CPD formula grant funds separate from those that are not supported by the use of CPD formula grant funds. Each specific objective developed to address a priority need, must be identified by number and contain proposed accomplishments and outcomes the jurisdiction expects to achieve in quantitative terms through related activities over a specific timeframe, or in other measurable terms as identified and defined by the jurisdiction.

**Sources of Funds:** Identify the sources of funds that will be used to achieve the stated specific objective during the period covered by the strategic plan.

**Performance Indicator:** Enter the performance indicator that most closely describes the type of accomplishment and the most appropriate measure of that accomplishment. The performance should be a reasonable projection of what will be accomplished during the period designated for the specific objective.

**Expected Number:** Enter the number of the item indicated under Performance Indicator that the jurisdiction expects will be accomplished during the period designated for the specific objective.

**Actual Number:** Enter the number of the item indicated under Performance Indicator that the jurisdiction actually accomplished during the time period of time designated for the specific objective. (This is for performance reporting purposes.)

### **Table 2A Priority Housing Needs and Activities**

The priority housing needs assessment shall be based on data available from the U.S. Census, as updated by a properly conducted local study or any other reliable source that the jurisdiction must clearly identify, and should reflect the required consultation with social service and public housing agencies regarding the housing needs of children, elderly persons, persons with disabilities, homeless persons, and other persons served by such agencies, and the citizen participation process. In establishing five-year allocation priorities, the unit of general local government should identify not only the various categories of low-income households that will have a priority for allocation of funds, but also the type of activities that would best meet the identified needs of households.

#### **Definitions**

**Assisted Household** - For the purpose of identification of priority needs, goals, and specific objectives, an assisted household is one that will receive benefits through the investment of Federal funds, either alone or in conjunction with the investment of other public or private funds. (The program funds providing the benefit(s) may be from any funding year or combined funding years.) A renter is benefited if the household or person takes occupancy of affordable housing that is newly acquired (standard housing), newly rehabilitated, or newly constructed, and/or receives rental assistance through new budget authority. An existing homeowner is benefited if the home's rehabilitation is completed. A homebuyer is benefited if a home is

purchased during the year. Households that will benefit from more than one program (e.g. a renter who receives rental assistance while occupying newly rehabilitated housing) must be counted only once. To be included, the household's housing unit must, at a minimum, satisfy the HUD Section 8 Housing Quality Standards (see, e.g. 24 CFR 882.109).

### **Section 215 Affordable Housing**

1. **Rental Housing:** A rental housing unit is considered to be an affordable housing unit if it is occupied by a extremely low-income, low-income, or moderate-income family or individual and bears a rent that is the lesser of (1) the Existing Section 8 Fair Market Rent for comparable units in the area or, (2) 30 percent of the adjusted income of a family whose income equals 65 percent of the median income for the area, except that HUD may establish income ceilings higher or lower than 65 percent of the median income because of prevailing levels of construction costs or fair market rents, or unusually high or low family incomes.
2. **Homeownership:**
  - (a) Housing that is for purchase (with or without rehabilitation) qualifies as affordable housing if it (1) is purchased by a extremely low-income, low-income, or moderate-income first-time homebuyer who will make the housing his or her principal residence; and (2) has a sale price that does not exceed the mortgage limit for the type of single family housing for the area under HUD's single family insuring authority under the National Housing Act.
  - (b) Housing that is to be rehabilitated, but is already owned by a family when assistance is provided, qualifies as affordable housing if the housing (1) is occupied by a extremely low-income, low-income, or moderate-income family which uses the house as its principal residence, and (2) has a value, after rehabilitation, that does not exceed the mortgage limit for the type of single family housing for the area, as described in (a) above.

### **Table 2A -- Priority Housing Needs Specific Instructions**

Enter the letter H (for High), M (for Medium), L (for Low), to signify the relative priority (if any) to be given to each category of residents during the period of time designated in the strategic plan component of this document.

**Small Related:** A household of 2 to 4 persons that includes at least one person related to the householder by blood, marriage, or adoption.

**Large Related:** A household of 5 or more persons that includes at least one person related to the householder by blood, marriage, or adoption.

**Elderly:** A one or two person household in which the head of the household or spouse is at least 62 years of age.

**Special Needs Populations:** A household of one or more persons that includes persons that have mobility impairments or disabilities, (i.e., mental, physical, developmental, persons with HIV/AIDS and their families), victims of domestic violence, persons with alcohol or other drug

addiction, or other special needs populations that may require housing or supportive services.

**Other:** A household of one or more persons that does not meet the definition of a small related, large related, elderly, or special needs population household. This category includes all households with only unrelated individuals present except those qualifying as elderly or special needs population households.

**(MFI) Median Family Income:**

**0-30%:** Subgroup with incomes of 0 to 30% of HUD-adjusted MFI for the area.

**31-50%:** Subgroup with income of 31 to 50% of HUD-adjusted MFI for the area.

**51-80%:** Subgroup with income of 51 to 80% of HUD-adjusted MFI for the area.

**Priority Need Level Column:** Choose the priority for allocating investment to each category of the housing need (if any). Designation of the relative priority is optional. If the following definitions of “high”, “medium”, and “low” priority are not used, please describe the manner in which the priorities for allocating investment are identified. For example, you can indicate a priority for allocating investments with a check mark, a “Y” for “Yes”, a “N” for “No”.

**High Priority:** Activities to address this unmet need will be funded by the locality with federal funds, either alone or in conjunction with the investment of other public or private funds during the period of time designated in the strategy portion of this document.

**Medium Priority:** If funds are available, activities to address this unmet need may be funded by the locality with federal funds, either alone or in conjunction with the investment of other public or private funds during the period of time designated in the strategy portion of this document. Also, the locality will take other actions to help this group locate other sources of funds.

**Low Priority:** The locality will not fund activities to address this unmet need during the period of time designated in the strategy portion of this document. The locality will consider certifications of consistency for other entities’ applications for Federal assistance.

**Unmet Need:** Enter the estimated number of eligible households in need of assistance for the ensuing five-year period that are not currently receiving assistance. This number is the unmet need.

**Goals:** For each of the categories of residents and tenure type, enter the 3-5 year goal identifying the number of households to be assisted with housing using funding from all sources during the period of time designated in the strategic plan.

**Total Goals:** Enter the total number of households to be assisted with housing during the period of time designated in the strategy portion of this document.

**Total Section 215 Goals:** Enter the total number of households to whom the jurisdiction will

provide affordable housing meeting the Section 215 criteria during the period of time designated in the strategy portion of this document using funds made available.

**Total Section 215 Renter Goals:** Enter the total number of renter households the jurisdiction will provide affordable rental housing meeting the Section 215 criteria during the period designated in the strategy portion of this document using funds made available.

**Total Section 215 Owner Goals:** Enter the total number of owner households the jurisdiction will provide affordable homeownership housing meeting the Section 215 criteria during the period of time designated in the strategy portion of this document using funds made available.

### **Table 2A -- Priority Housing Activities Specific Instructions**

**Priority:** Choose the priority for allocating investment to each category of the housing activity. Designation of the relative priority is optional. If the following definitions of “high”, “medium”, and “low” priority are not used, please describe the manner in which the priorities for allocating investment are identified. For example, you can indicate a priority for allocating investments with a check mark, a “Y” for “Yes”, a “N” for “No”.

#### **CDBG**

**Goals:** For each category of activities, enter the 3-5 year goal identifying the number of households to be assisted with completed housing units that are considered affordable (using local definitions of affordability) housing using CDBG funding during the period of time designated in the strategic plan.

#### **HOME**

**Goals:** For each category of activities, enter the 3-5 year goal identifying the number of households to be assisted with completed housing units that are considered affordable housing (meeting the HOME definitions of affordability) using HOME funding during the period of time designated in the strategic plan.

#### **HOPWA**

**Goals:** For each category of activities, enter the 3-5 year goal identifying the number of households to be assisted with housing units that are considered affordable housing (using local definitions of affordability) or services using HOPWA funding during the period of time designated in the strategic plan.

### **Table 2B Priority Community Development Needs**

#### **General Information**

The needs listed in this section are non-housing community development needs. You should identify all priority unmet public facility, infrastructure, public service, anti-crime, youth, senior

program, economic development, planning, and other non-housing community development needs that your community either currently has or will have over the period of time designated in the strategic plan component of this document. This should reflect the results of the citizen participation process and the required consultation with adjacent units of local government.

**Priority Need Level Column:** Choose the priority for allocating investment to each category of the housing need (if any). Designation of the relative priority is optional. If the following definitions of “high”, “medium”, and “low” priority are not used, please describe the manner in which the priorities for allocating investment are identified. For example, you can indicate a priority for allocating investments with a check mark, a “Y” for “Yes”, a “N” for “No”.

**High Priority:** The jurisdiction plans to use funds made available for activities that address this unmet need during the period of time designated in the strategic plan.

**Medium Priority:** If funds are available, activities to address this unmet need may be funded by the locality during the period of time designated in the strategic plan. Also, the locality will take other actions to help this group locate other sources of funds.

**Low Priority:** The jurisdiction does not plan to use funds made available for activities to address this unmet need during the period of time designated in the strategic plan. The jurisdiction will consider certifications of consistency for other entities’ applications for Federal assistance.

**No Such Need:** The jurisdiction finds there is no need or the jurisdiction shows that this need is already substantially addressed.

**Unmet Priority Need:** This is an optional field. Should you use it, enter the estimated number of units of measure for each unmet priority non-housing community development need identified in the community for the ensuing five-year period designated in the strategic plan, regardless of whether adequate funds (public and private) are available to address the identified priority need. For public facilities and improvements indicate the number of activities needing assistance that the community considers a priority. For clearance and demolition, indicate the number of buildings. For public services, indicate the estimated number of people needing assistance that the community considers a priority. For economic development needs, indicate the number of businesses or activities that community considers a priority.

**Dollars to Address Unmet Priority Need:** This is an optional field. Enter the estimated expenditure needed (in current dollars) to address the priority non-housing community development needs the jurisdiction either currently has or will have over the period of time designated in the strategic plan. Include all funds (public and private) that would be needed to address the priority needs.

**Goals:** This is an optional field. Should you use it, enter the 3-5 year community development goals the jurisdiction expects to achieve during the period of time designated in the strategic plan component of this document using funds made available. For public facilities and improvements, indicate the number of activities. For clearance and demolition, indicate the number of buildings. For public services, indicate the number of people to be served. For



economic development needs, indicate the number of activities or businesses to be assisted or the number of jobs that will be created/retained.

**Table 2C**  
**Summary of Specific Multi-Year Objectives**  
**Housing and Community Development**

**Specific Objective #:** Identify each specific multi-year objective with a unique number. For example, DH-1.1, DH-1.2, DH-1.3 for specific objectives under the category that correspond with availability/accessibility of decent housing.

**Specific Objectives:** Identify the specific, measurable objective(s) under each general outcome/objective category. List specific objectives that are supported by the use of CPD formula grant funds separate from those that are not supported by the use of CPD formula grant funds. Each specific objective developed to address a priority need, must be identified by number and contain proposed accomplishments and outcomes the jurisdiction expects to achieve in quantitative terms through related activities over a specific timeframe, or in other measurable terms as identified and defined by the jurisdiction.

**Sources of Funds:** Identify the sources of funds that will be used to achieve the stated specific objective during the period covered by the strategic plan.

**Performance Indicator:** Enter the performance indicator that most closely describes the type of accomplishment and the most appropriate measure of that accomplishment. The performance should be a reasonable projection of what will be accomplished during the period designated for the specific objective.

**Expected Number:** Enter the number of the item indicated under Performance Indicator that the jurisdiction expects will be accomplished during the period designated for the objective.

**Actual Number:** Enter the number of the item indicated under Performance Indicator that the jurisdiction actually accomplished during the time period of time designated for the objective. (This is for performance reporting purposes.)

**Table 3A**  
**Summary of Specific Annual Objectives**

**Specific Objective #:** Identify each specific annual objective with a unique number. For example, DH-1.1, DH-1.2, DH-1.3 for specific annual objectives under the category that corresponds with availability/accessibility of affordable housing.

**Sources of Funding:** Identify the sources of funding that will be used to achieve the stated specific objective during the program year.

**Specific Annual Objectives:** Identify the specific, measurable annual objective that corresponds with the specific objectives in the strategic plan under each outcome/objective category. List specific annual objectives that are supported by the use of CPD formula grant funds separate from those that are not supported by the use of CPD formula grant funds. Each specific annual objective developed to address a priority need, must be identified by number and contain proposed accomplishments and annual program year numeric goals the jurisdiction

expects to achieve in quantitative terms, or in other measurable terms as identified and defined by the jurisdiction.

**Performance Indicator:** Enter the performance indicator that most closely describes the type of accomplishment and the most appropriate measure of that accomplishment. The performance should be a reasonable projection of what will be accomplished during the program year.

**Expected Number:** Enter the annual number of the item indicated under Performance Indicator that the jurisdiction expects to accomplish during the annual program year.

**Actual Number:** Enter the annual number of the item indicated under Performance Indicator that the jurisdiction actually accomplished at the end of the annual program year. (This is for performance reporting purposes.)

### **Table 3B Annual Affordable Housing Goals**

**Resources used during the period:** Enter a “X” in the cells that correspond with the source or sources of formula grant funds made available to the jurisdiction that were used for the various categories of households and the acquisition of existing units, production of new units, rehabilitation of existing units, construction of new, rental assistance, and homeownership assistance, and other activities as appropriate during the period of time designated in the action plan portion of this document.

#### **Beneficiary Goals (Sec. 215 Only)**

**Homeless Households:** Enter the total number of homeless households to whom the jurisdiction will provide affordable housing meeting the Section 215 criteria during the period of time designated in the action plan portion of this document.

**Non-Homeless Households:** Enter the total number of non-homeless households to whom the jurisdiction will provide affordable housing meeting the Section 215 criteria during the period of time designated in the action plan portion of this document.

**Special Needs Households:** Enter the total number of special needs households to whom the jurisdiction will provide affordable housing meeting the Section 215 criteria during the period of time designated in the action plan portion of this document.

**Total Sec. 215 Beneficiaries:** Enter the total number of homeless, non-homeless, and special needs households. (This should equal the sum of the three previous lines for the number of homeless, non-homeless, and special needs households and match the total Section 215 goal under the Combined Rental and Owner Goals section.)

**NOTE:** The three categories of homeless, non-homeless and special needs households are exclusive groups for purposes of this table. For example, if a persons is non-homeless and has special needs, you will need to choose the one category that would be most appropriate for your program(s). The household cannot be counted twice in both categories.

**Rental Housing Goals (Sec. 215)**

Enter the expected number of households the jurisdiction hopes to serve by the acquisition of existing units, production of new units, rehabilitation of existing units, and rental assistance during the period of time designated in the action plan portion of this document with funds made available by HUD to the jurisdiction.

**Total Section 215 Affordable Renter:** Enter the total number of renter households to whom the jurisdiction will provide affordable rental housing meeting the Section 215 criteria during the period designated in the action plan portion of this document using funds made available to the jurisdiction. (This should be equal to the sum of the four previous lines for the number of households served by the acquisition of existing units, production of new units, rehabilitation of existing units, and rental assistance.)

**Home Owner Housing Goals (Sec. 215 Only)**

Enter the expected number of households the jurisdiction hopes to serve by the acquisition of existing units, production of new units, rehabilitation of existing units, and homebuyer assistance during the period of time designated in the action plan portion of this document with funds made available by HUD to the jurisdiction.

**Total Sec. 215 Affordable Owner:** Enter the total number of owner households to whom the jurisdiction will provide affordable homeownership housing meeting the Section 215 criteria during the period of time designated in the action plan portion of this document using funds made available to the jurisdiction. (This should be equal to the sum of the four previous lines for the number of households served by the acquisition of existing units, production of new units, rehabilitation of existing units, and homebuyer assistance.)

**Combined Rental and Home Owner Goals (Sec. 215 Only)**

Enter the expected number of households the jurisdiction hopes to serve by the acquisition of existing units, production of new units, rehabilitation of existing units, rental assistance and homebuyer assistance during the period of time designated in the action plan portion of this document with funds made available by HUD to the jurisdiction. (Each line should equal the number of households assisted under the respective lines for rental goals and owner goals.)

**Total Section 215 Affordable Housing:** Enter the total number of households to whom the jurisdiction will provide affordable housing meeting the Section 215 criteria during the period of time designated in the action portion of this document using funds made available to the jurisdiction. (This should be equal to the sum of the five previous lines for the number of households served by the acquisition of existing units, production of new units, rehabilitation of existing units, rental assistance and homebuyer assistance.)

**Overall Annual Housing Goals (Section 215 + any other Affordable Housing Goals)**

**Total Annual Rental Housing Goal:** Enter the total number of rental households to be assisted with completed housing units that are considered affordable (using local definitions of

affordability) during the period of time designated in the action plan portion of this document.

**Total Annual Owner Housing Goal:** Enter the total number of owner households to be assisted with completed housing units that are considered affordable (using local definitions of affordability) during the period of time designated in the action plan portion of this document.

**Total Annual Housing Goal:** Enter the total number of households to be assisted with completed housing units that are considered affordable (using local definitions of affordability) during the period of time designated in the action plan portion of this document. (This should be equal to the sum of the two previous lines for the annual rental housing goal and annual owner housing goal.)

### **Table 3C Action Plan Projects Table**

#### **General Instructions:**

This portion of the table is to be used to enter information on projects or activities that will be carried out during the program year with grant funds made available for program year XXXX and, if applicable, funds made available from prior year funds.

**Project Title:** Enter the name of the project or activity.

**Priority Need Category:** Enter the priority need category that most nearly describes what you will do with available funds. The grantees selects it's identified need from a list of priority need categories. The priority need categories are: Homeless/HIV/AIDS, Non-homeless Special Needs, Rental Housing, Owner Occupied Housing, Public Facilities, Infrastructure, Economic Development, Public Services, Planning/Administration, and Other.

**Specific Objective #:** The grantee should identify the specific annual objective number identified in Table 3A.

**Descriptions:** Enter information is necessary to describe the proposed project or activity pursuant to 24 CFR 91.220 (d), including the priority need that will be addressed and the number and type of families that will benefit from the proposed activity. For CDBG activities, the description should include sufficient detail, including location, to permit a clear understanding of the nature and eligibility of the activity and to allow citizens to determine the degree to which they may be affected. For example, housing activities should include the number and type families that will benefit from the proposed activity and whether the assistance is for owner-occupied, rental, or publicly owned units.

**Objective Category:** Identify the general objective category in accordance with the Federal Register Notice dated March 7, 2006 issued by HUD.

**Outcome Category:** Identify the general outcome category in accordance with the Federal Register Notice dated March 7, 2006 issued by HUD.

**Location and Target Area:** There are five possible formats for this section (Address, Community Wide, CT & BG, N/A, Suppressed). This information indicates where an activity will occur. If the activity is located in a target area, also identify the name of the target area and the census tract(s) for the entire target area.

**Project ID:** The value of this variable uniquely identifies each and every project you enter.

**Local ID:** This is an optional alpha-numeric field. You may use it to enter a activity code of up to 18 characters that has some local significance. No two activities may share the exact same code.

**HUD Matrix Code:** Enter the code that most nearly describes what you will do with the funds. Only one matrix code may be used for a activity.

**Funding:** This section describes the amount of Federal and non-Federal resources that will be used to address needs identified in the plan.

**Community Development (CDBG):** Enter the amount of CDBG funds that will be used for activities that will take place during the program year. Include any program income and Sec. 108 loan funds in the amount.

**Homeless (ESG):** Enter the amount of Emergency Shelter Grant funds that will be used for activities that will take place during the program year.

**Housing (HOME):** Enter the amount of HOME funds that will be used for activities that will take place during the program year.

**HIV/AIDS (HOPWA):** Enter the amount of Housing Opportunities for Persons with AIDS program funds will be used for activities that will take place during the program year within the eligible metropolitan statistical area.

**Total CPD Formula Funds:** This is the total amount of CPD formula funds that will be used to address needs identified in the plan.

**Prior Year Formula Funds:** Identify amount of prior year CPD formula funds that will be used during the program year to address needs identified in the plan.

**Assisted Housing:** Identify the amount of Assisted Housing program funds that will be used during the program year to address needs identified in the plan.

**PHA (Public Housing Agency):** Identify the amount of public housing agency program funds that will be used during the program year to address needs identified in the plan.

**Other Funding:** Identify amount of funding from other HUD or non-HUD sources that will be used during the program year to address needs identified in the plan.

**Total:** This is the total amount of funds that will be used to address needs identified in the plan.

**Project Details:**

**CDBG Citation:** Enter the CDBG regulatory citation based upon the matrix code that you selected.

**CDBG National Objective:** Use this field only if you enter an amount greater than zero for CDBG \$. You should indicate the National Objective for the CDBG program that this activity will meet.

**Type of Recipient:** Indicate the type of recipient that will be administering the activity.

**Performance Indicator:** Enter the performance indicator that most closely describes the type of accomplishment and the most appropriate measure of that accomplishment. The performance should be a reasonable projection of what will be accomplished within the program year.

**Annual Units:** Enter the total number of the item you have indicated under Performance Indicator that you expect will be accomplished during the program year.

**Units Upon Completion:** Enter the total number of the item you have indicated under Performance Indicator that you expect will be accomplished after all funds have been spent.

**Starting Date:** Enter the projected starting date for the activity.

**End Date:** Enter the projected completion date for the activity.

**Project's Primary Purpose:** Indicate whether the activity's primary purpose to help the homeless; help persons with HIV/AIDS; help persons with disabilities; address needs of public housing.

**Table 4**  
**Priority Public Housing Needs**

**General Information**

This section contains an optional table for describing priority needs of public housing. You should identify all priority public housing restoration and revitalization needs that your community either currently has or will have over the period of time designated in the strategic plan component of this document. This should reflect the results of the citizen participation process and the required consultation with public housing agencies that are located in your jurisdiction.

**Priority Need Level Column:** Choose the priority for allocating investment to each category of the housing need (if any). Designation of the relative priority is optional. If the following definitions of "high", "medium", and "low" priority are not used, please describe the manner in which the priorities for allocating investment are identified. For example, you can indicate a priority for allocating investments with a check mark, a "Y" for "Yes", a "N" for "No".

**High Priority:** The public housing agency or the jurisdiction plan to address this need with Federal funds, either alone or in conjunction with the investment of other public or private funds during the period designated in the strategy portion of this document.

**Medium Priority:** If funds are available, the public housing agency or jurisdiction may address this need with Federal funds, either alone or in conjunction with the investment of other public or private sector funds during the period of time designated in the strategy portion of this document. Also, the locality will take other actions to help this group locate other sources of funds.

**Low Priority:** The public housing agency or jurisdiction do not plan to use Federal funds, either alone or in conjunction with the investment of other public or private resources for activities that address this need during the period of time designated in the strategy portion of this document. The jurisdiction will consider certifications of consistency for other entities' applications for Federal assistance.

**No Such Need:** The public housing agency or jurisdiction finds this is not a priority need or this need is already substantially addressed.

**Estimated Dollars to Address:** Enter the estimated expenditure needed (in current dollars) to address the priority public housing needs the locality either currently has or will have over the period of time designated in the strategic plan component of this document. Include all funds (Federal and non-Federal) that would be needed to address the priority needs.

### **Attachment Neighborhood Revitalization Strategy Areas**

A jurisdiction that elects to develop a neighborhood revitalization strategy that includes the economic empowerment of low- and moderate-income persons may, upon HUD approval of the strategy, obtain greater flexibility in the use of CDBG funds in the revitalization area(s). These incentives are as follows:

- (1) **Job Creation/Retention as Low/Mod Area Benefit:** Job creation/retention activities undertaken pursuant to the strategy may be qualified as meeting area benefit requirements, thus eliminating the need for a business to track the income of persons that take, or are considered for, such jobs (24 CFR 570.208(a)(1)(vii) and (d)(5)(i));
- (2) **Aggregation of Housing Units:** Housing units assisted pursuant to the strategy may be considered to be part of a single structure for purposes of applying the low- and moderate-income national objective criteria, thus providing greater flexibility to carry out housing programs that revitalize a neighborhood (24 CFR 570.208(a)(3) and (d)(5)(ii));
- (3) **Aggregate Public Benefit Standard Exemption:** Economic development activities carried out under the strategy may, at the grantee's option, be exempt from the aggregate public benefit standards, thus increasing a grantee's flexibility for program design as well as reducing its record-keeping requirements (24 CFR 570.209(b)(2)(v)(L) and (M)); and,



(4) **Public Service Cap Exemption:** Public services carried out pursuant to the strategy by a Community-Based Development Organization will be exempt from the public service cap (24 CFR 570.204(b)(2)(ii)).

In developing a neighborhood revitalization strategy, localities should consider that HUD will approve the strategy for this purpose only if it meets the following criteria:

- (1) **Boundaries:** The grantee has identified the neighborhood's boundaries for which the strategy applies. All areas within those boundaries must be contiguous.
- (2) **Demographic Criteria:** The designated area must be primarily residential and contain a percentage of low- and moderate-income residents that is equal to the "upper quartile percentage" (as computed by HUD pursuant to 24 CFR 570.208(a)(1)(ii)) or 70 percent, whichever is less, but not less than 51 percent)
- (3) **Consultation:** The strategy must be developed in consultation with the area's stakeholders, including residents, owners/operators of businesses and financial institutions, non-profit organizations, and community groups that are in or serve the neighborhood;
- (4) **Assessment:** The strategy must include an assessment of the economic situation in the area and an examination of economic development improvement opportunities and the problems likely to be encountered;
- (5) **Economic Empowerment:** There must be a realistic development strategy and implementation plan to promote the area's economic progress focusing on activities to create meaningful jobs for the unemployed and low- and moderate-income residents of the area (including jobs created by HUD-assisted efforts) as well as activities to promote the substantial revitalization of the neighborhood; and
- (6) **Performance Measurement:** The strategy must identify the results (e.g. physical improvements, social initiatives, economic empowerment, increases in homeownership and property values) expected to be achieved, expressing them in terms of outputs and outcomes that are readily measurable. This will be in the form of "benchmarks."

Since the grantee's HUD CPD Field Office representative will review the neighborhood strategy submission, the grantee should consult with its HUD representative to discuss what existing documents and information the grantee will be relying on for its submission and what information HUD will need to make this approval. Approval of the jurisdiction's Consolidated Plan does not imply approval of a neighborhood revitalization strategy proposal. HUD approval of any such strategy will be issued separately.

## Annual Performance Report Executive Summary

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Name of Grantee

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Reporting Period

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### Executive Summary

Provide a brief overview that includes major initiatives and highlights how activities undertaken during the program year addressed strategic plan objectives and areas of high priority identified in the consolidated plan. *(This should be summary information so that HUD and citizens can easily assess annual progress made toward meeting longer term goals.)*

### Summary of Resources and Distribution of Funds

Identify the Federal funds made available for furthering the objectives of the consolidated plan. For each formula grant program, the grantee shall identify the total amount of funds available (including estimated program income), the total amount of funds committed during the reporting period, the total amount expended during the reporting period, and the geographic distribution and location of expenditures. Jurisdictions are encouraged to include maps in describing the geographic distribution and location of investment (including areas of low-income and minority concentration). The geographic distribution and expenditure requirement may be satisfied by specifying the census tracts where expenditures were concentrated and the percentage of funds expended in target areas. The jurisdiction must also submit an updated CDBG Financial Summary Report (PR26).

### Three - Five Year Plan Assessment of Progress

1. Three - Five Year goals and objectives
  - a. Describe the accomplishments in attaining the goals and objectives for the reporting period. *(This should be summary information so that HUD and citizens can easily assess progress made toward meeting longer term goals.)*
  - b. Provide a breakdown of the CPD formula grant funds spent in attaining the goals and objectives.
  - c. If applicable, explain why progress was not made towards meeting the goals and objectives.
2. Describe the manner in which you would change your program as a result of your experiences.

## **Assessment of Annual Progress**

### **1. Affirmatively Furthering Fair Housing**

- a. Actions taken to affirmatively further fair housing.
- b. Summary of impediments to fair housing choice in the Analysis of Impediments (AI).
- c. Identify actions taken to overcome effects of impediments identified in the AI.

### **2. Affordable Housing**

Evaluate progress in meeting its specific affordable housing objectives, including:

- a. Comparison of proposed numeric goals (from the consolidated plan and annual action plan) with the actual number of extremely low income, low income, and moderate income renter and owner households assisted during the reporting period.
- b. Report the number of households served meeting the Section 215 requirements of affordable housing (essentially meeting the definitions in 24 CFR 92.252 and 92.254 for renters and owners, respectively).
- c. Description of efforts to address worst case needs (defined as low-income renters with severe cost burden, in substandard housing, or involuntarily displaced).
- d. Description of efforts to address the accessibility needs of persons with disabilities.

### **3. Continuum of Care**

- a. Identify actions taken to address the needs of homeless persons and persons with special needs who are not homeless but require supportive housing (including persons with HIV/AIDS). This description must include actions taken to implement a continuum of care strategy for homeless and new Federal resources obtained during the year.
- b. Identify actions taken to prevent homelessness and to help homeless persons make the transition to permanent housing and independent living.
- c. Identify new Federal resources obtained from the Homeless SuperNOFA.

### **4. Describe Other Actions in Strategic Plan or Action Plan Taken To:**

- a. Address obstacles to meeting underserved needs.
- b. Foster and maintain affordable housing.
- c. Eliminate barriers to affordable housing.

- d. Overcome gaps in institutional structures and enhance coordination.
- e. Improve public housing and resident initiatives.
- f. Evaluate and reduce lead based paint hazards.
- g. Ensure compliance with program and comprehensive planning requirements.
- h. Reduce the number of persons living below the poverty level.

## 5. Leveraging Resources

- a. Identify progress in obtaining “other” public and private resources to address needs.
- b. How Federal resources from HUD leveraged other public and private resources.
- c. How matching requirements were satisfied.

## 6. Citizen Comments

Describe steps taken to obtain citizen input and provide a summary of citizen comments it received regarding the programs covered by its consolidated plan and the disposition of those comments. (Section 91.105(d)(2) of the consolidated plan regulations requires that grantees consider any comments or views of citizens, received in writing or orally at public hearings, in preparing the CAPER.)

## 7. Self Evaluation

Provide an evaluation of accomplishments. This evaluation must include a comparison of the proposed versus actual outcomes of each outcome measure submitted with the consolidated plan and explain, if applicable why progress was not made toward meeting goals and objectives.

Questions a grantee may want to consider include:

- a. Are activities and strategies having an impact on identified needs? What indicators would best describe overall results? Are major goals on target?
- b. What barriers may have a negative impact on fulfilling strategies and achieving the overall vision?
- c. Based on this evaluation, what adjustments or improvements to strategies and activities might help meet the identified needs more effectively?

## 8. Monitoring

- a. Describe how and the frequency with which you monitored your activities.
- b. What is the status of your grant programs?
  - Are any activities or strategies falling behind schedule?

- Are grant disbursements timely?
- Do actual expenditures differ from letter of credit disbursements?

## **Program Narratives**

In addition to the general narrative, a grantee must provide narratives that address the following requirements of each of the four consolidated plan programs for which it received funding.

### **All Grantees Receiving CDBG Funds Must Submit the Following Narrative Information:**

#### **1. Assessment of Relationship of CDBG Funds to Goals and Objectives**

- Assess use of CDBG funds in relation to the priorities, needs, goals, and specific objectives in the Consolidated Plan, particularly the highest priority activities.
- Evaluate progress made toward meeting goals for providing affordable housing using CDBG funds, including the number and types of households served.

#### **2. Changes in Program Objectives**

- Identify nature of and reasons for any changes in program objectives and how the jurisdiction would change its program as a result of its experiences.

#### **3. Assessment of Efforts in Carrying Out Planned Actions**

- Indicate how you pursued all resources indicated in the Consolidated Plan.
- Indicate how you provided certifications of consistency in a fair and impartial manner.
- Indicate how you did not hinder Consolidated Plan implementation by action or willful inaction.

#### **4. Use of CDBG Funds for National Objectives**

- If CDBG funds were not used exclusively for activities benefiting low/mod persons, for slum/ blight activities, or to meet urgent community needs, explain why?
- If you did not comply with certification to expend no less than 70% of your CDBG funding during the specified period on activities that benefit low/mod person, explain why?

#### **5. Anti-displacement and Relocation** -- for activities that involve acquisition, rehabilitation or demolition of occupied real property:

- Steps actually taken to minimize the amount of displacement resulting from the CDBG-assisted activities.

- b. Steps taken to identify households, businesses, farms or nonprofit organizations who occupied properties subject to the Uniform Relocation Act or Section 104(d) of the Housing and Community Development Act of 1974, as amended, and whether or not they were displaced, and the nature of their needs and preferences.
- c. Steps taken to ensure the timely issuance of information notices to displaced households, businesses, farms, or nonprofit organizations.

**6. Low/Mod Job Activities** -- for economic development activities undertaken where jobs were made available but not taken by low or moderate income persons:

- a. Actions taken by grantee and businesses to ensure first consideration was or will be given to low/mod persons.
- b. List by job title of all the permanent jobs created/retained and those that were made available to low/mod persons.
- c. If any of jobs claimed as being available to low/mod persons require special skill, work experience, or education, a description of steps being taken or that will be taken to provide such skills, experience, or education.

**7. Program income received**

- a. Amount of program income reported that was returned to each individual revolving fund, e.g., housing rehabilitation, economic development, or other type of revolving fund.
- b. Amount repaid on each float-funded activity.
- c. All other loan repayments broken down by the categories of housing rehabilitation, economic development, or other
- d. Amount of income received from the sale of property by parcel.

**8. Prior period adjustments** -- where reimbursement was made this reporting period for expenditures (made in previous reporting periods) that have been disallowed, provide the following information:

- a. Activity name and number as shown in IDIS.
- b. Program year(s) in which the expenditure(s) for the disallowed activity(ies) was reported.
- c. Amount returned to line-of-credit or program account.
- d. Total amount to be reimbursed and the time period over which the reimbursement is to be made, if the reimbursement is made with multi-year payments.

## 9. Loans and other receivables

- a. Principal balance for each float-funded activity outstanding as of the end of the reporting period and the date(s) by which the funds are expected to be received.
- b. Total number of other loans outstanding and the principal balance owed as of the end of the reporting period.
- c. List separately the total number of outstanding loans that are deferred or forgivable, the principal balance owed as of the end of the reporting period, and the terms of the deferral or forgiveness.
- d. Total number and amount of loans made with CDBG funds that have gone into default and for which the balance was forgiven or written off during the reporting period.
- e. A list of the parcels of property owned by the grantee or its subrecipients that have been acquired or improved using CDBG funds and that are available for sale as of the end of the reporting period.

## 10. Lump sum agreements

- a. Name of the financial institution.
- b. Date the funds were deposited.
- c. Date the use of funds commenced.
- d. Percentage of funds disbursed within 180 days of deposit in the institution.

## 11. Neighborhood Revitalization Strategies – for grantees that have HUD-approved neighborhood revitalization strategies:

- a. Progress against benchmarks, i.e. outputs and outcomes for the program year.

For grantees with Federally-designated EZs or ECs that received HUD approval for a neighborhood revitalization strategy, reports that are required as part of the EZ/EC process shall suffice for purposes of reporting progress.

### All Grantees Receiving HOME Funds Must Submit the Following Narrative Information:

#### 1. Assessment of Relationship of HOME Funds to Goals and Objectives

- a. Assess the use of HOME funds in relation to the priorities, needs, goals, and specific objectives in the consolidated plan, particularly the highest priority needs.
- b. Evaluate progress made toward meeting goals for providing affordable housing using HOME funds, including the number and types of households served.

## 2. HOME Match Report

- a. Use HOME Match Report HUD-40107-A to report on match contributions for the period covered by the Consolidated Plan Program year.

## 3. HOME MBE and WBE Report

- a. Use Part III of HUD Form 40107 to report contracts and subcontracts with Minority Business Enterprises (MBEs) and Women's Business Enterprises (WBEs).

## 4. Assessments

- a. Results of on-site inspections of rental housing.
- b. HOME jurisdiction's affirmative marketing actions.
- c. Outreach to minority and women owned businesses.

### **All Grantees Receiving HOPWA Funds Must Submit the Following Narrative Information:**

#### **Assessment of Relationship of HOPWA funds to Goals and Objectives**

- a. Assess the use of HOPWA funds in relation to the priorities, needs, goals, and specific objectives in the consolidated plan, particularly the highest priority activities.
- b. Evaluate progress toward meeting the goals of providing affordable housing using HOPWA funds, including the number and types of households served.

To report progress under these general and HOPWA specific requirements, the grantee may integrate the HOPWA elements in their standard CAPER report or establish a HOPWA-specific narrative by completing the following information. These elements are also found in the optional Consolidated Plan Management Process tool (CPMP), which is available for use in planning and reporting on Consolidated Plan activities.

See <http://www.hud.gov/offices/cpd/aidshousing/programs/2006reportingreqs.cfm> for details on revised HOPWA CAPER guidance and user guide.

**Part 1: HOPWA Executive Summary.** Provide an executive summary (1-3 pages) and a specific objectives narrative which address the following:

A. Grantee and Community Overview (Web summary).

A brief description of the grant organization, the area of service, the name of program contact(s), and a broad overview of the range/type of housing activities, along with information on each



sponsor by name, main project site by zip code and related organization information.

B. Annual Performance under the Action Plan.

- a. Report on the actions taken during the year that addressed the special needs of persons who are not homeless but require supportive housing, and assistance for persons who are homeless.
- b. Evaluate the progress in meeting the project's objectives for providing affordable housing, including a comparison of actual outputs and outcomes to proposed goals and progress made on the other planned actions indicated in the strategic and action plans. The evaluation can address any related program adjustments or future plans.
- c. Include any assessment of client outcomes for achieving housing stability, reduced risks of homelessness and improved access to care.
- d. Report on the use of committed leveraging from other public and private resources that helped to address needs identified in the plan. Report the number of stewardship units of housing which have been created through acquisition, rehabilitation or new construction with any HOPWA funds.
- e. Describe any other accomplishments recognized in the community due to the use of HOPWA funds, including any projects in developmental stages that are not operational.
- f. Provide an analysis of the extent to which HOPWA funds were distributed among different categories of housing needs consistent with the geographic distribution plans identified in its approved Consolidated Plan.

C. Barriers or Trends Overview.

- a. Describe any barriers (including non-regulatory) encountered, actions in response to barriers, and recommendations for program improvement.
- b. Describe any expected trends facing the community in meeting the needs of persons living with HIV/AIDS, and provide any other information important in providing services to persons with HIV/AIDS.
- c. Note any evaluation, studies, or other assessments of the HOPWA program available to the public.

**Part 2: Accomplishment Data – (Web summary information).**

- a. Complete and submit CAPER Performance Chart 1 Planned Goals and Chart 2 Actual Performance;
- b. Complete and submit CAPER Performance Chart 3 for Housing Stability Outcomes, HOPWA Outcomes on Access to Care and Support in conjunction with HOPWA-funded Housing Assistance, Monthly Household Income in conjunction with HOPWA-funded

## Housing Assistance, and HOPWA Outcomes on Access to Care and Support not in conjunction with HOPWA-funded Housing Assistance.

Note: in connection with this CAPER, similar information must be entered and submitted in IDIS. Use the IDIS MA04 screen actual accomplishment data to compare results with proposed accomplishment data for (1) all active HOPWA activities and (2) activities completed in the most recent program year; and enter and submit into the related HOPWA accomplishment IDIS screens accomplishment data for (1) each active HOPWA activity and (2) activities completed in the most recent program year.

**CAPER Explanation:** The HOPWA CAPER charts are to be used in connection with the grantee narrative and performance assessment portion of the CAPER. Under that annual report, grantees address their actions and report on performance with the use of federal and other funds during the operating year. Grantees of HOPWA funding are required in the CAPER's narrative to explain how the HOPWA-related activities address strategic plan objectives and to evaluate progress in providing affordable housing and addressing the needs of homeless persons and the special needs of persons that are not homeless but require supportive housing, including persons living with HIV/AIDS and their families. Grantees must complete and submit the CAPER charts as required under the Part 2: Accomplishment Data section.

Performance Charts 1 Planned Goals and 2 Actual Performance are integrated and will help illustrate progress in leveraging resources by providing a means to report on the grantee's progress in obtaining "other" public and private resources that address needs identified in the plan. The HOPWA section of the CAPER also requires that grantees provide a narrative with information on what other resources were used in conjunction with HOPWA-funded activities. These charts provide a method to illustrate this use of other resources in addressing the housing needs of persons living with HIV/AIDS and their families and the supportive services provided.

Performance Chart 3 uses client outcome measures to demonstrate program effectiveness. The HOPWA program's overall outcome is that assisted households have been enabled to better maintain a stable living environment in housing that is safe, decent, and sanitary, and to reduce the risks of homelessness, and improve access to HIV treatment and other health care increases through the use of annual resources with the goal that this reaches 80 percent by 2008.

### **All Grantees Receiving ESG Funds Must Submit the Following Narrative Information:**

#### **1. Assessment of Relationship of ESG Funds to Goals and Objectives**

- a. Identify actions to address emergency shelter and transitional housing needs of homeless individuals and families (including significant subpopulations such as those living on the streets).
- b. Evaluate progress made in using ESG funds to address homeless and homeless prevention needs, goals, and specific objectives established in the consolidated plan.

- c. Detail how ESG projects are related to implementation of comprehensive homeless planning strategy, including the number and types of individuals and persons in households served with ESG funds.

## **2. Matching Resources**

- a. Provide specific sources and amounts of new funding used to meet match as required by 42 USC 11375(a)(1), including cash resources, grants, and staff salaries, as well as in-kind contributions such as the value of a building or lease, donated materials, or volunteer time.

## **3. State Method of Distribution**

- a. States must describe their method of distribution and how it rated and selected its local government agencies and private nonprofit organizations acting as subrecipients.

## **4. Activity and Beneficiary Data**

- a. Completion of Emergency Shelter Grant Program Performance reports showing ESGP expenditures by type of activity. Also describe any problems in collecting, reporting, and evaluating the reliability of this information.

## **5. Chronic Homelessness**

- a. Describe actions steps taken to address chronic homelessness.

## **6. Homeless Discharge Coordination**

As part of the government developing and implementing a homeless discharge coordination policy, ESG homeless prevention funds may be used to assist very-low income individuals and families at risk of becoming homeless after being released from publicly funded institutions such as health care facilities, foster care or other youth facilities, or corrections institutions or programs.

- a. Explain how your government is implementing a homeless discharge coordination policy, and how ESG homeless prevention funds are being used in this effort.

## **OTHER ATTACHMENTS AND NARRATIVES**

Attach copies of summary of specific objectives, priority housing needs and activities, priority community development needs, and annual housing completion goals from the consolidated plan, (i.e., Table 1A, 1B, 1C, 2A, 2B, 2C, 3A, 3B).

The grantee must submit an updated Financial Summary Report (PR26), and other information required by regulations located at 24 CFR 91.520.

Include any CAPER information not covered by narratives in any other section.

The following IDIS reports with an asterisk (\*) contain information that must be provided to citizens in order to satisfy annual performance report requirements contained for Consolidated Plan under 24 CFR 91.520.

- \*Summary of Accomplishments Report (C04PR23)
- \*Summary of Consolidated Plan Projects for Report Year XXXX (C04PR06)
- \*CDBG Financial Summary Report (C04PR26)
- \*CDBG Summary of Activities (C04PR03)
- \*CDBG Performance Measures Report (C04PR83)
- \*CDBG Strategy Area, CDFI, and Local Target Area (C04PR84)
- \*HOME Housing Performance Report (Grantee/PJ) (C04PR85)
- \*ESG Performance Measures Report (C04PR81)
- \*HOPWA Measuring Housing Stability Outcomes (C04PR80)
- \*HOPWA Units/Households and Funds Expended (C04PR82)

## **Public Participation**

This component requests information needed to satisfy public participation requirements. It is important that the reports provided to citizens, community groups, and local political leaders present a clear and complete statement of what has been accomplished not only to HUD, but also to citizens, community groups, and local political leaders. Therefore, we urge your attention to assembling this information in a manner that relates back to the needs, strategies, and objectives as described and presented in your approved Consolidated Plan and Action Plan.

Before submitting performance reports to the HUD Field Office for review, the jurisdiction must make the report available to the public for examination and comment for a period of at least 15 days. A copy of the performance information made available to HUD, including the summary of public comments received as a result of the public participation process, must be available for examination by the public upon request.

The grantee must provide the public a summary of community accomplishments for each priority need that the community designated in the strategic plan. For public services, this must include the number of persons served during the reporting period. For public facilities and improvements, this must include the number of projects assisted and the number of projects completed during the reporting period. For economic development needs, this must include the actual number of businesses assisted, jobs assisted, and the actual number of extremely low-, low-, and moderate-income persons assisted during the reporting period.

This summary of accomplishments can be met using the standard reports generated from the Integrated Disbursements and Information System (IDIS). IDIS information retrieval and reporting capability currently can provide the basic accomplishment and program information needed to identify the eligibility and funding status of activities.