

**ANNUAL ACTION PLAN
FEDERAL FISCAL YEAR 2019**

**Program Year 45
July 1, 2019 to June 30, 2020**



**City of
Davenport**



**Submitted to HUD: June 7, 2019
Approved by HUD: August 13, 2019
Amended: April 7, 2020
Amendment Approved by HUD:
September 29, 2020**



Fifth Year Annual Action Plan

The Plan includes narrative responses to CAPER questions that CDBG, HOME, HOPWA, and ESG grantees must respond to in order to be compliant with the Consolidated Planning Regulations.

Formatting Notice:

The City of Davenport is required to submit this Annual Action Plan in the template provided by HUD, which contains specified questions, tables and other information and cannot be edited.

The HUD provided template contains formatting irregularities such as: columns that are too narrow, paragraphs split over more than one page, blank space, compressed text, and other discrepancies.

City Staff has compensated for these irregularities where possible, but many remain that cannot be changed.

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AP-05 Executive Summary - 24 CFR 91.200(c), 91.220(b)

1. Introduction

The Annual Action Plan is one of the requirements in order for the City of Davenport to receive funds through the Department of Housing and Urban Development (HUD) formula programs including the Community Development Block Grant (CDBG) and HOME Investment Partnerships (HOME).

The Annual Action Plan presents an overview of the goals and projects for the upcoming program year that will address the needs identified in the Five Year Consolidated Plan. These goals and projects will address the needs of low- and moderate-income residents including: homeowners, renters, homeless persons and families, and persons with non-homeless special needs. Components of the plan are a description of the process, including the citizen participation process, and the annual action plan to address identified needs. This document represents a strategic plan based on general areas of need and how these needs might be addressed using these federal funds during the next year, July 1, 2019 through June 30, 2020.

It is important to note that the needs identified in this plan far outstrip the funding available to address them. Federal funding for the CDBG and HOME programs has diminished dramatically in the past several years. For the program year beginning July 1, 2019:

- The CDBG allocation represents a 33% cut from the highest funding year,
- The HOME allocation represents a 47% cut from the highest funding year.

Significant challenges exist in confronting the housing and community development needs of low to moderate income residents, including lack of capacity of area nonprofits, the housing crisis that has limited the availability of credit to both individuals and developers, and the age and condition of housing stock and infrastructure available. The funding cuts to federal programs further reduces the ability of cities to meet the challenges faced by residents. While the City makes every effort to partner with non-profit groups, other government agencies, and for-profit developers, the needs continue to outstrip the funding available to address them. Through program design changes and more focused funding strategies, it is the City's hope that the impact of the reduced funding can be minimized.

When the City began its annual planning process, Congress has not completed the appropriations process for CDBG and HOME and could not predict when FY19 allocations would occur. HUD advised in CPD Notice 19-01 that grantees have 60 days after allocations are announced to submit their plans and Davenport will follow this guidance.

2. Summarize the objectives and outcomes identified in the Plan

This could be a restatement of items or a table listed elsewhere in the plan or a reference to another location. It may also contain any essential items from the housing and homeless needs assessment, the housing market analysis or the strategic plan.

The City of Davenport held public input meetings and conducted a survey to gather citizen input. The results of these meetings, along with recommendations from the City's Five Year Consolidated Plan, Comprehensive Plan, Housing Needs Assessment, and Analysis of Impediments of Fair Housing were presented to the 15 member Citizens' Advisory Committee. The Committee reviewed the general areas of need identified in the Five Year Consolidated Plan, which are described below:

- Increasing affordable decent housing for both renters and homeowners, particularly larger units, those households with very low incomes, and units outside areas of concentrated low income and minority populations.
- Increasing employment and business opportunities in the community to address lack of employment opportunities, particularly for younger workers, low to moderate income households, and minorities.
- Increasing neighborhood quality and safety through better code enforcement and nuisance violations, removing blighting conditions, and providing improved neighborhood infrastructure.
- Providing services to residents, particularly those that benefit youth, improve transportation options and financial literacy.

From these broader areas of need, the Citizens' Advisory Committee identified the following Local Objectives for Year 45, which were adopted by the City Council on November 5, 2018:

- Improve the availability and livability of affordable housing in Davenport neighborhoods.
- Support programs to retain existing businesses, to attract new businesses, and to assist small business clients.
- Provide support for human needs for the citizens of Davenport emphasizing building life and employment skills.

These needs are expected to be addressed with federal funds through activities carried out by the City, nonprofit organizations, and the private sector, as funding and qualified applications permit.

3. Evaluation of past performance

This is an evaluation of past performance that helped lead the grantee to choose its goals or projects.

Each year, the City is required to submit a Consolidated Annual Performance Evaluation Report (CAPER) to HUD, reporting on the activities that were funded with CDBG and HOME dollars, the amount spent, and the beneficiaries assisted. The City has submitted the required reports each year, and HUD has

accepted the reports each year. Electronic versions of the City's past CAPER reports can be found on the City's website at www.cityofdavenportiowa.com.

4. Summary of Citizen Participation Process and consultation process

Summary from citizen participation section of plan.

The City's Annual Action Plan citizen participation process took place in September of 2018.

The City of Davenport held public input meetings and conducted a survey to gather citizen input. The results of these meetings, along with recommendations from the City's Comprehensive Plan, Housing Needs Assessment, and Analysis of Impediments of Fair Housing were presented to the 15 member Citizens' Advisory Committee. The Committee reviewed the results and identified needs from these items. From these needs, a set of local objectives were identified to be acted upon for the fourth year of the five year plan. In subsequent years, additional public input will be gathered to generate local objectives for upcoming years.

Public input was gathered through a series of community meetings and a survey. The meetings and survey were publically advertised in the newspaper, on the City's website, cable channel, on NextDoor, Facebook and Twitter, and directly mailed and emailed to area nonprofit groups that the City either has worked with directly or has contact with through one of the groups of which the City is a member. Many of these groups serve special populations, such as veterans, homeless, those with physical or mental disabilities, minorities, and non-English speakers. Information about the meetings and survey was also emailed to the members of the City's Davenport NEW mailing list, which has hundreds of email addresses. Flyers and posters for the meetings and survey were distributed to local nonprofits, at the public libraries, at the City's Office of Assisted Housing, and to the offices of subsidized housing developments monitored by the City, which comprise more than 300 affordable units. In all, more than 136 agencies and neighborhood groups were notified of the meeting. Free oral interpretation was advertised as available upon request for those with limited English proficiency, as well as the availability of other accommodations if needed. All agencies were encouraged to attend meetings, complete the survey, or both, and to invite their clients to attend the meeting and/or complete the survey.

The 2015-2019 Five Year Consolidated Plan, the 2019 annual plan and availability of CDBG and HOME funding were discussed during the meetings, and survey respondents were asked to identify priorities for funding.

5. Summary of public comments

This could be a brief narrative summary or reference an attached document from the Citizen Participation section of the Con Plan.

The City of Davenport held public input meetings and conducted a survey to gather citizen input during the planning process for the Annual Plan. The results of these meetings, along with recommendations from the City's comprehensive plan, Housing Needs Assessment, and Analysis of Impediments of Fair Housing were presented to the 15 member Citizens' Advisory Committee. The Committee reviewed the results and identified areas of need from these items. A Summary of the comments received at the public meetings and the survey results can be found in the Citizen Comments portion of this plan.

A Public Hearing was held on the Year 45 CDBG allocations on April 3, 2019. No comments were received at the Public Hearing. The allocation amounts were approved by the City Council at the April 10, 2019 City Council Meeting. Once the actual allocation amounts were known, an additional opportunity for public comment will be available at the May 15, 2019 Committee of the Whole and then will be approved at the May 22, 2019 City Council meeting. No additional public comments were received.

Due to a delay in the budget process by Congress, HUD's announcement of allocation amounts to entitlement communities was delayed. The City of Davenport is following HUD's guidance outlined in CPD Notice 19-01 dated February 13, 2019 for delayed submission of the annual plan. A copy of this document is attached to the plan.

The Annual Action Plan was available for public comment from May 8, 2019 – June 6, 2019. No additional public comments were received.

6. Summary of comments or views not accepted and the reasons for not accepting them

No comments or views will not be accepted.

7. Summary

The City of Davenport has carried out the preparation of this Annual Action Plan according to HUD requirements, and has gathered valuable public input as well as consultant data that has been used to help guide the funding decisions for the CDBG and HOME program.

As noted above, decreased funding from the federal level for the CDBG and HOME programs has made it unlikely that all of the needs identified in this plan can be fully addressed. While the City makes every effort to partner with non-profit groups, other government agencies, and for-profit developers, the needs continue to outstrip the funding available to address them. Through program design changes and more focused funding strategies, it is the City's hope that the impact of the reduced funding can be minimized.

PR-05 Lead & Responsible Agencies – 91.200(b)

1. Agency/entity responsible for preparing/administering the Consolidated Plan

Describe the agency/entity responsible for preparing the Consolidated Plan and those responsible for administration of each grant program and funding source.

Agency Role		Name	Department/Agency
CDBG Administrator	DAVENPORT	Community Planning & Economic Development	
HOME Administrator	DAVENPORT	Community Planning & Economic Development	

Table 1 – Responsible Agencies

Narrative (optional)

Consolidated Plan Public Contact Information

AP-10 Consultation – 91.100, 91.200(b), 91.215(I)

1. Introduction

The City of Davenport engages in consultation with a variety of other entities, both public and private, during the preparation of the consolidated plan and during each subsequent annual plan. In addition, throughout each program year, the City remains in regular contact with the CDBG subrecipients and HOME developers who actually deliver housing and services. Through this contact, the City is able to maintain an understanding of changing conditions, such as when new programs and services are offered, when existing services cease, and what vacancy rates and needs are for housing.

Provide a concise summary of the jurisdiction’s activities to enhance coordination between public and assisted housing providers and private and governmental health, mental health and service agencies (91.215(I))

The City of Davenport remains in ongoing contact with housing providers and health, mental health, and service agencies. Examples are:

- City Staff are members of the Scott County Housing Council/Housing Cluster, and Quad City Shelter & Transitional Housing Council. These groups all have as members staff from the Scott County Health Department and local non-profit groups that address various physical and mental health needs of Davenport citizens. These groups include those that serve the needs of citizens with physical disabilities, accessibility challenges, mental disabilities, the elderly, survivors of domestic violence and those who suffer from HIV/AIDS. All members of these groups were invited to participate in the public input process, and many did contribute, either in person or through the survey. Monthly meetings of these groups enable City staff to engage and be aware of changes, challenges and needs faced by organizations involved with health, mental health, and public service activities.
- Through the CDBG program, the City has funded agencies that meet the health, mental health, and service needs of residents, and the City is likely to fund these activities again in the future, pending application for funding and resources permitting. Previously funded agencies include those providing accessibility, transportation, and mental health services, services to the homeless and survivors of domestic violence, those with HIV/AIDS, elderly, youth and others. All of these agencies were invited to participate in the public input process, and many did contribute, either in person or through the survey.
- The Office of Assisted Housing (OAH) administers the Section 8 and Public Housing programs for the City. It is a division within CPED, the City department which administers the CDBG and HOME grants. Staff meet regularly to discuss current issues and needs. OAH administers a variety of vouchers, including ones that can be used in units targeting those with physical or mental disabilities, veterans and the elderly.

- The City monitors a portfolio of more than 300 privately owned subsidized units, which were funded originally through programs such as CDBG, HOME, NSP, CDBG-DR and various tax credit programs. Monitoring enables the City to ensure that the units remain affordable for the duration of the financing commitment, and enables City staff to remain in communication with housing providers that are in direct contact with tenants and are most able to identify needs and issues as they arise. Importantly, monitoring provides valuable information regarding the need for affordable housing and information about vacancy rates and waiting lists that helps the City plan for affordable housing in the future. Many of the units currently in the portfolio were developed to meet the needs of the elderly and those with physical and mental disabilities. Many affordable housing operators have chosen to have service providers located in or available to visit their buildings with targeted programming for those individuals. In the case of housing for those with mental health issues, one housing operator has on site staff coordinating care and services for tenants.
- As new projects come forward, the City works with developers to ensure that the affordable housing needs of the community are being addressed by the proposed projects. New projects that are developed with federal funds are checked to ensure that they meet applicable accessibility requirements, as well as to ensure that applicable lead based paint regulations are followed. These steps ensure that the activity is meeting the health and physical access needs of current and future tenants.

Describe coordination with the Continuum of Care and efforts to address the needs of homeless persons (particularly chronically homeless individuals and families, families with children, veterans, and unaccompanied youth) and persons at risk of homelessness.

The City of Davenport is part of the Continuum of Care for Scott County, which is part of Iowa’s Balance of State Continuum of Care. The Continuum of Care is a strategic plan for providing a broad range of homeless services. This continuum covers emergency shelters, transitional housing, and permanent supportive housing. The Scott County Continuum of Care is developed and administered by the Quad-City Shelter and Transitional Housing Council (QCSTHC). QCSTHC is comprised of providers, funders, and government representatives. The QCSTHC and its members were invited to participate in the public input process, and many did attend and contribute, either in person or through the survey. City staff are members of the QCSTHC and attend monthly meetings of the group throughout the year. These meetings enable City staff to engage with those groups and be aware of changes, challenges and needs faced by organizations carrying out health, mental health, and service activities.

Describe consultation with the Continuum(s) of Care that serves the jurisdiction's area in determining how to allocate ESG funds, develop performance standards for and evaluate outcomes of projects and activities assisted by ESG funds, and develop funding, policies and procedures for the operation and administration of HMIS

The City of Davenport is not an ESG recipient. Agencies that serve City residents have access through the State of Iowa, and the City staff offers assistance to agencies in completing required steps for State funding.

2. Describe Agencies, groups, organizations and others who participated in the process and describe the jurisdiction's consultations with housing, social service agencies and other entities

Table 2 – Agencies, groups, organizations who participated

1	Agency/Group/Organization	Big Brothers Big Sisters of Mississippi Valley
	Agency/Group/Organization Type	Services-Children
	What section of the Plan was addressed by Consultation?	Homeless Needs - Families with children Anti-poverty Strategy Development of Local Objectives
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	This agency was invited to attend public meetings and to complete a survey to develop local objectives. This agency was encouraged (as were all agencies) to notify their clients of the public meetings and to distribute the survey to them to ensure their views were included. In addition, as a CDBG subrecipient, the City has an ongoing relationship with this agency throughout the year.
2	Agency/Group/Organization	Project Renewal
	Agency/Group/Organization Type	Services-Children
	What section of the Plan was addressed by Consultation?	Homeless Needs - Families with children Anti-poverty Strategy Development of Local Objectives
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	This agency was invited to attend public meetings and to complete a survey to develop local objectives. This agency was encouraged (as were all agencies) to notify their clients of the public meetings and to distribute the survey to them to ensure their views were included. In addition, as a CDBG subrecipient, the City has an ongoing relationship with this agency throughout the year.

3	Agency/Group/Organization	Vera French Community Mental Health Center
	Agency/Group/Organization Type	Housing Services - Housing Services-Children Services-Persons with Disabilities Services-homeless Services-Health Health Agency Publicly Funded Institution/System of Care
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Public Housing Needs Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy Non-Homeless Special Needs Development of Local Objectives
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	This agency was invited to attend public meetings and to complete a survey to develop local objectives. This agency was encouraged (as were all agencies) to notify their clients of the public meetings and to distribute the survey to them to ensure their views were included. In addition, as a CDBG subrecipient, the City has an ongoing relationship with this agency throughout the year.
4	Agency/Group/Organization	BOYS & GIRLS CLUB OF THE MISSISSIPPI VALLEY
	Agency/Group/Organization Type	Services-Children Services-Education

	What section of the Plan was addressed by Consultation?	Homeless Needs - Families with children Homelessness Needs - Unaccompanied youth Anti-poverty Strategy Development of Local Objectives
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	This agency was invited to attend public meetings and to complete a survey to develop local objectives. This agency was encouraged (as were all agencies) to notify their clients of the public meetings and to distribute the survey to them to ensure their views were included. In addition, as a CDBG subrecipient, the City has an ongoing relationship with this agency throughout the year.
5	Agency/Group/Organization	The Salvation Army
	Agency/Group/Organization Type	Housing Services - Housing Services-Children Services-homeless
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Public Housing Needs Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy Development of Local Objectives
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	This agency was invited to attend public meetings and to complete a survey to develop local objectives. This agency was encouraged (as were all agencies) to notify their clients of the public meetings and to distribute the survey to them to ensure their views were included. In addition, as a CDBG subrecipient, the City has an ongoing relationship with this agency throughout the year.

6	Agency/Group/Organization	Humility of Mary Shelter, Inc. d/b/a Humility Homes and Services Inc.
	Agency/Group/Organization Type	Housing Services - Housing Services-homeless
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Public Housing Needs Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy Anti-poverty Strategy Development of Local Objectives
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	This agency was invited to attend public meetings and to complete a survey to develop local objectives. This agency was encouraged (as were all agencies) to notify their clients of the public meetings and to distribute the survey to them to ensure their views were included. In addition, as a CDBG subrecipient, the City has an ongoing relationship with this agency throughout the year.
7	Agency/Group/Organization	Friendly House
	Agency/Group/Organization Type	Services-Children Services-Elderly Persons Services-Persons with Disabilities Services-homeless

	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homeless Needs - Families with children Homelessness Needs - Unaccompanied youth Homelessness Strategy Non-Homeless Special Needs Anti-poverty Strategy Development of Local Objectives
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	This agency was invited to attend public meetings and to complete a survey to develop local objectives. This agency was encouraged (as were all agencies) to notify their clients of the public meetings and to distribute the survey to them to ensure their views were included. In addition, as a CDBG subrecipient, the City has an ongoing relationship with this agency throughout the year.
8	Agency/Group/Organization	FAMILY RESOURCES, INC
	Agency/Group/Organization Type	Housing Services - Housing Services-Children Services-Victims of Domestic Violence Services-homeless Services-Health Services - Victims

<p>What section of the Plan was addressed by Consultation?</p>	<p>Housing Need Assessment Public Housing Needs Homeless Needs - Families with children Homelessness Needs - Unaccompanied youth Homelessness Strategy Non-Homeless Special Needs Anti-poverty Strategy Development of Local Objectives</p>
<p>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</p>	<p>This agency was invited to attend public meetings and to complete a survey to develop local objectives. This agency was encouraged (as were all agencies) to notify their clients of the public meetings and to distribute the survey to them to ensure their views were included. In addition, as a CDBG subrecipient, the City has an ongoing relationship with this agency throughout the year.</p>

9	Agency/Group/Organization	Quad City Shelter and Transitional Housing Council
	Agency/Group/Organization Type	Housing Services - Housing Services-Children Services-Elderly Persons Services-Persons with Disabilities Services-Persons with HIV/AIDS Services-Victims of Domestic Violence Services-homeless Services-Health Services-Employment Services - Victims Health Agency Child Welfare Agency Publicly Funded Institution/System of Care Other government - County Other government - Local Regional organization
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy HOPWA Strategy Anti-poverty Strategy Development Local Objectives

	<p>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</p>	<p>Quad City Shelter and Transitional Housing Council (QCSTHC) is a consortium of 23 non profit and government entities that are dedicated to serving the homeless, those in danger of homelessness, and those entering housing after being homeless in the Quad City area. QCSTHC was invited to attend public meetings and to complete a survey to develop local objectives. Its 22 member organization were notified of the public meeting and the survey to ensure their views were included. In addition, City staff members attend meetings of this group year round to engage with local organization working on homelessness in our community, learn what actions they are undertaking, as determine what the City can do to assist. This group was encouraged (as were all agencies) to notify their members of the public meetings and to distribute the survey to them to ensure their views were included. A membership list of the participating organizations is attached as part of the Citizen Comment section.</p>
10	<p>Agency/Group/Organization</p>	<p>City of Davenport</p>
	<p>Agency/Group/Organization Type</p>	<p>Housing PHA Services - Housing Services-Children Services-Elderly Persons Services-Persons with Disabilities Service-Fair Housing Other government - Local Grantee Department</p>

<p>What section of the Plan was addressed by Consultation?</p>	<p>Housing Need Assessment Public Housing Needs Homelessness Strategy Non-Homeless Special Needs Market Analysis Economic Development Anti-poverty Strategy Lead-based Paint Strategy Development of local objectives</p>
<p>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</p>	<p>Multiple City departments were consulted in the development of this plan. The departments included Public Works (regarding infrastructure, building conditions/code enforcement), Office of Assisted Housing (regarding public housing, assisted housing and homelessness), Planning Department (regarding neighborhood planning and historic preservation, Economic Development (regarding developing, attracting and retaining business and industry), Davenport Civil Rights Commission (regarding fair housing and equal opportunity), and Davenport CitiBus (regarding public transportation). All departments were invited to attend public meetings and to complete a survey to develop local objectives. City departments were encouraged (as were all agencies) to notify their clients of the public meetings and to distribute the survey to them to ensure their views were included.</p>

11	Agency/Group/Organization	Neighborhood Groups
	Agency/Group/Organization Type	Housing Services - Housing Services-Children Services-Elderly Persons Services-Persons with Disabilities Services-Persons with HIV/AIDS Services-Victims of Domestic Violence Services-homeless Services-Health Services-Education Services-Employment Service-Fair Housing Services - Victims Health Agency Neighborhood Organization
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Non-Homeless Special Needs Market Analysis Economic Development Anti-poverty Strategy Development of local objectives
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Local groups were invited to participate in the process. 51 groups were contacted via email, NextDoor, and through contact with the City's Neighborhood Development Coordinators to attend public meetings and to complete a survey to develop local objectives. These groups were encouraged (as were all agencies) to notify their members of the public meeting to distribute the survey to them to ensure their views were included.

12	Agency/Group/Organization	Interfaith Housing
	Agency/Group/Organization Type	Housing Services - Housing
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Market Analysis Anti-poverty Strategy Lead-based Paint Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	This agency was invited to attend public meetings and to complete a survey to develop local objectives. This agency was encouraged (as were all agencies) to notify their clients of the public meetings and to distribute the survey to them to ensure their views were included. In addition, as a recipient of HOME funds and a CHDO, the City has an ongoing relationship with this agency throughout the year.

13	Agency/Group/Organization	Scott County Housing Council
	Agency/Group/Organization Type	Housing Services - Housing Services-Children Services-Elderly Persons Services-Persons with Disabilities Services-Persons with HIV/AIDS Services-Victims of Domestic Violence Services-homeless Service-Fair Housing Services - Victims Other government - Federal Other government - County Other government - Local Regional organization Planning organization Business Leaders Civic Leaders Business and Civic Leaders Community Development Financial Institution Foundation Grantee Department Neighborhood Organization Private Sector Banking / Financing

<p>What section of the Plan was addressed by Consultation?</p>	<p>Housing Need Assessment Public Housing Needs Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy Non-Homeless Special Needs HOPWA Strategy Market Analysis Anti-poverty Strategy Lead-based Paint Strategy Development of local objectives</p>
<p>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</p>	<p>Scott County Housing Council (SCHC) is a consortium of 54 civic, business, financial, non-profit, for-profit, and government entities that are dedicated to addressing affordable housing and homelessness in the Quad City area, which includes Davenport. SCHC was invited to attend public meetings and to complete a survey to develop local objectives. Its 49 member organization were notified of the meetings and to distribute the survey to them to ensure their views were included. In addition, City staff members attended meetings of this group year round to engage with local organizations working to improve access to affordable housing in our community, learn what actions they are undertaking, and determine what the City can do to assist. This group was encouraged (as were all agencies) to notify their clients of the public meetings and to distribute the survey to them to ensure their views were included. A membership list of the participating organizations is attached as part of the Citizen Comments section.</p>

Identify any Agency Types not consulted and provide rationale for not consulting

Other local/regional/state/federal planning efforts considered when preparing the Plan

Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
Continuum of Care		

Table 3 – Other local / regional / federal planning efforts

Narrative (optional)

AP-12 Participation – 91.105, 91.200(c)

1. Summary of citizen participation process/Efforts made to broaden citizen participation Summarize citizen participation process and how it impacted goal-setting

The City of Davenport held public input meetings and conducted a survey to gather citizen input. The results of the meetings and survey, along with needs identified in the City's Five Year Consolidated Plan, and recommendations from the Comprehensive Plan, Housing Needs Assessment, and Analysis of Impediments of Fair Housing were presented to the Citizens' Advisory Committee. The Committee reviewed the results and identified needs from these items. From these needs, a set of local objectives were identified to be acted upon for the fourth year of the five year plan. In subsequent years, additional public input will be gathered to generate local objectives for upcoming years.

Public input was gathered through a series of community meetings and a survey. The meetings and survey were publically advertised in the newspaper, on the City's website, cable channel, on NextDoor, Facebook and Twitter, and through direct contact and email to area non profit groups that the City either has worked with directly or has contact with through one of the groups of which the City is a member. Many of these groups serve special populations, such as veterans, homeless, those with physical or mental disabilities, minorities, and non-English speakers. Information about the meetings and survey was also emailed to the members of the City's Davenport NEW mailing list, which has hundreds of email addresses. Flyers and posters for the meetings and survey were distributed to local non profits, at the public libraries, at the City's Office of Assisted Housing, and to the offices of subsidized housing developments monitored by the City, which comprise more than 300 affordable units. In all, more than 70 agencies were notified of the meeting. All agencies were encouraged to attend meetings, complete the survey, or both, and to invite their clients to attend the meeting and/or complete the survey.

Citizen Participation Outreach

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (if applicable)
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1	Public Meeting	<p>Minorities</p> <p>Non-English Speaking - Specify other language: Oral interpretation offered for all</p> <p>Persons with disabilities</p> <p>Non-targeted/broad community</p> <p>Residents of Public and Assisted Housing</p> <p>Non-Profit Agencies/ Service Providers</p>	<p>Three meetings were held at different locations around the City, including at a project based Section 8 building. All locations were handicapped accessible.</p>	<p>Housing, Infrastructure and Economic development were the highest needs identified at the meetings, in that order. Among public service activities, assistance for persons with disabilities and the homeless were identified as the highest needs. When deciding on areas of the city with the highest need, 63% of respondents identified the area south of Kimberly Road and west of Brady Street. The highest need in that area was identified as a need for</p>	<p>Any comments received will be included.</p>	
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Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (if applicable)
				economic development.		
2	Survey	<p>Minorities</p> <p>Non-English Speaking - Specify other language: Oral Interpretation available upon request</p> <p>Persons with disabilities</p> <p>Non-targeted/broad community</p> <p>Residents of Public and Assisted Housing</p> <p>Non Profit Agencies/ Service Providers</p>	An online survey was distributed and 114 responses were received. The survey was available for 4 weeks and was distributed through a variety of paper and electronic methods.	The survey resulted in the top priorities being improving older commercial districts, improving the housing in the urban core area, and infrastructure improvements.	Any comments received will be included.	

Table 4 – Citizen Participation Outreach

Expected Resources

AP-15 Expected Resources – 91.220(c)(1,2)

Introduction

Anticipated Resources

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
CDBG	public - federal	Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services	1,482,327	500,000	858,959	2,841,286	0	Entitlement for Year 45 is \$1,482,327. Estimated program income for year 45 is \$500,000. Estimated prior year resources includes \$858,959 in entitlement funds, but no estimated rolled over program income. This is the last year of the 5 year plan; no further resources are anticipated for the remainder of the 5 year plan.

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
HOME	public - federal	Acquisition Homebuyer assistance Homeowner rehab Multifamily rental new construction Multifamily rental rehab New construction for ownership TBRA	432,858	200,000	1,627,722	2,260,580	0	Entitlement for Year 45 is \$432,858. Estimated program income for year 45 is \$200,000. Estimated prior year resources includes \$680,228 EN, \$58,248 AD, and \$889,246 PI. Due to new rules published by HUD in the Federal Register on 12/02/16 governing the utilization of HOME program income, the City intends to accumulate program income for use in the current or next program year. The estimate here includes both what is expected to be rolled over from 2018 into the 2019 plan year, and what is expected to be earned in the 2019 plan year. This is the last year of the 5 year plan; no further resources are anticipated for the remainder of the 5 year plan.

Table 5 - Expected Resources – Priority Table

Explain how federal funds will leverage those additional resources (private, state and local funds), including a description of how matching requirements will be satisfied

Federal funds will be utilized to leverage additional funds in larger rental developments. Depending on the actual applications received, these other leveraged funds could include low income housing tax credits, historic rehabilitation credits, local, State and other Federal funds, and

private equity.

The CDBG program does not have a matching requirement, but leveraging is encouraged by the City through the application process for funding in both public services and rental development. The City does not require matching funds for owner occupied rehabilitation projects funded through the housing rehabilitation program.

The HOME program requires matching funds equivalent to 25% of the funds expended for all activities (excluding CHDO and administration). The City has from time to time qualified for a partial or full exemption from the matching requirements, due to economic conditions and/or natural disasters. As a result, the City currently has a balance of excess matching funds that can be applied to projects in the future. In addition, matching funds are required for unit production activities. These requirements are typically met through the receipt of non-federal grant funds and tax benefit programs by the developers.

If appropriate, describe publically owned land or property located within the jurisdiction that may be used to address the needs identified in the plan

When the City has property available that would be appropriate for redevelopment, it has from time to time offered these lots to other entities for development. These entities have included both for profit developers and non-profit developers. In the event land is offered to a developer, the terms of the transfer are evaluated based on the need for the development, the cash flow of the proposed development, and the ability of the receiving entity to pay. Depending on the outcome of this evaluation, the land may be sold or donated to the receiving entity according to terms negotiated on a case by case basis. In the past, examples of this have included the donation of foreclosed homes to nonprofit groups for rehabilitation and resale, the donation of single family lots for the construction of affordable homes, and the transfer of commercial land for the construction of affordable rental units.

In the event the City would transfer property to a developer, whether public or private, City policy and State law will be followed concerning the public transfer of the property. In some instances where the City contemplates donating City owned land for development, a Request for Proposals may be issued to determine the level of interest and type of development.

The plan identifies infrastructure in support of housing activities as a goal. Towards that end, infrastructure improvements on public land in the right of way may be undertaken. This could include streets, sewer, sidewalk, curb/gutter and lighting improvements among other things.

Discussion

All federal funds received will be utilized to pursue the goals and projects outlined in this plan according to applicable regulations.

Annual Goals and Objectives

AP-20 Annual Goals and Objectives

Goals Summary Information

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	Housing	2015	2019	Affordable Housing		Housing	CDBG: \$882,088 HOME: \$2,260,580	Rental units constructed: 2 Household Housing Unit Homeowner Housing Added: 3 Household Housing Unit Homeowner Housing Rehabilitated: 12 Household Housing Unit Direct Financial Assistance to Homebuyers: 18 Households Assisted
2	Economic Development	2015	2019	Non-Housing Community Development		Economic Development	CDBG: \$994,759	Facade treatment/business building rehabilitation: 5 Business Jobs created/retained: 10 Jobs
3	Infrastructure and Area Benefits	2015	2019	Non-Housing Community Development		Infrastructure and Area Benefits	CDBG: \$381,291	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 300 Persons Assisted

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
4	Low-Mod Clientele and Public Services	2015	2019	Homeless Non-Homeless Special Needs Non-Housing Community Development		Low-Mod Clientele and Public Services	CDBG: \$265,000	Public service activities other than Low/Moderate Income Housing Benefit: 879 Persons Assisted Homeless Person Overnight Shelter: 200 Persons Assisted Homelessness Prevention: 200 Persons Assisted

Table 6 – Goals Summary

Goal Descriptions

1	Goal Name	Housing
	Goal Description	<p>Funds will be utilized to improve the availability and livability of affordable housing in Davenport neighborhoods through acquisition, rehabilitation, construction, demolition/blight removal, homebuyer assistance and other activities. In addition, funds will be used to support housing program delivery costs and holding/soft costs for projects in the program.</p> <p>Funding allocated includes: CDBG and HOME entitlement/estimated program income for 2019 and prior years for both housing projects and program delivery staff and operations.</p>
2	Goal Name	Economic Development
	Goal Description	<p>Funds will be used support programs to retain existing businesses, to attract new businesses, and to assist small business clients.</p> <p>Funding allocated includes: CDBG entitlement/estimated program income for 2019 and prior years for both economic development projects and program delivery staff.</p>

3	Goal Name	Infrastructure and Area Benefits
	Goal Description	<p>Funds will be used to improve the availability and livability of affordable housing in Davenport neighborhoods.</p> <p>In any given year, the ability to complete infrastructure projects is dependent on funds available, eligible projects coming forward, and availability of public works staff and contractors to carry out the projects. Infrastructure projects may not be completed every year.</p> <p>In the current year, one activity begun in FY 2018 will still be underway at the start of 2019. Additionally, one project is being considered for approximately \$300,000. Entitlement or program income may be used for this project depending upon the availability of funds at the time of draw requests. Funding not utilized under the Infrastructure and Area Benefit goal will be utilized instead under the Housing goal.</p> <p>Entitlement or program income may be used for this project depending upon the availability of funds at the time of draw requests.</p>
4	Goal Name	Low-Mod Clientele and Public Services
	Goal Description	Funds will be used to provide support for human needs for the citizens of Davenport, emphasizing building life skills.

Projects

AP-35 Projects – 91.220(d)

Introduction

During the public participation process, four needs were identified:

- increasing affordable decent housing for both renters and homeowners, particularly larger units, those households with very low incomes, and units outside areas of concentrated low income and minority populations;
- increasing employment and business opportunities in the community to address lack of employment opportunities, particularly for younger workers, low to moderate income households, and minorities;
- increasing neighborhood quality and safety through better code enforcement and nuisance violations, removing blighting conditions;
- providing improved neighborhood infrastructure; providing services to residents, particularly those that benefit youth, improve transportation options and financial literacy.

In the process of developing the annual plan, the needs were used to develop local objectives to for the year:

- improve the availability and livability of affordable housing in Davenport neighborhoods;
- support programs to retain existing businesses, to attract new businesses, and to assist small business clients;
- provide support for human needs for the citizens of Davenport emphasizing building life and employment skills.

Utilizing these needs and objectives, a CDBG application process was undertaken to identify non-profit groups and city departments that could address the objectives. Successful applicants were awarded CDBG grant funding to undertake the projects listed below.

Projects

#	Project Name
1	City Administration/Planning
2	Housing
3	Economic Development
4	Infrastructure and Area Benefits
5	Low-Mod Clientele and Public Services

Table 7 - Project Information

Describe the reasons for allocation priorities and any obstacles to addressing underserved needs

In meeting underserved needs, the largest obstacle remains the availability of funding to address needs. The CDBG funding available for this program year has declined by 33% from the highest funding year, even while the need has stayed the same or grown. HOME funding has declined by 47% since the highest funded year.

Because funding is not available to meet all needs, the Citizens' Advisory Committee, which is responsible for evaluating applications and awarding funding, has put in place an evaluation process that places a higher point value on closely addressing the identified local objectives and on compliance and performance in carrying out funded activities. In this way, the CAC is attempting to use the limited federal dollars available in the most efficient manner.

In addition to availability of funding, eligible non-profit partners in the community must bring forward applications for programs to meet identified needs and local objectives. For example, in the current program year, no applications were received for transportation or financial literacy programs, though those are needs identified through the planning process. In the absence of an eligible applicant to carry out these activities, the City is unable to evaluate them for funding in the current program year.

AP-38 Project Summary
Project Summary Information

1	Project Name	City Administration/Planning
	Target Area	
	Goals Supported	Housing Economic Development Infrastructure and Area Benefits Low-Mod Clientele and Public Services
	Needs Addressed	Housing Economic Development Infrastructure and Area Benefits Low-Mod Clientele and Public Services
	Funding	CDBG: \$318,148
	Description	Coordinates, administers, and monitors the CDBG and HOME programs; prepares reports and plans required by HUD, prepares environmental and historic preservations studies, monitors compliance of all federally funded activities under the grants. Manages CDBG and HOME funded assets including the loan portfolio, program income and any properties funded in whole or in part with CDBG or HOME funds. In the event that the City would pursue a Section 108 loan for housing or infrastructure, City Staff funded through CDBG and/or HOME would administer the Section 108 activities. This year funds are being budgeted for completion of an updated Analysis of Impediments to Fair Housing, which became necessary after HUD postponed the due date for the new Assessment of Fair Housing under HUD's Affirmatively Furthering Fair Housing rule. The cost of this analysis is expected to be substantial and is being budgeted over two program years. Expected resources include 2019 entitlement and program income, as well as prior year entitlement and program income.
	Target Date	6/30/2020
	Estimate the number and type of families that will benefit from the proposed activities	HUD does not require the reporting of beneficiary data for planning and administrative activities, however, all of the beneficiaries served through the CDBG and HOME programs in a given year are also beneficiaries of planning and administrative support.
	Location Description	Planning and administration funds are used to support all other CDBG and HOME funded activities which are available citywide.

	Planned Activities	<p>Coordinates, administers, and monitors the CDBG and HOME programs; prepares reports and plans required by HUD, prepares environmental and historic preservations studies, monitors compliance of all federally funded activities under the grants. Manages CDBG and HOME funded assets including the loan portfolio, program income and any properties funded in whole or in part with CDBG or HOME funds. In the event that the City would pursue a Section 108 loan for housing or infrastructure, City Staff funded through CDBG and/or HOME would administer the Section 108 activities.</p> <p>This year funds are being budgeted for completion of an updated Housing Needs Assessment, in preparation for the next 5 year plan.</p> <p>Expected resources include 2019 entitlement and program income, as well as prior year entitlement and program income.</p>
2	Project Name	Housing
	Target Area	
	Goals Supported	Housing
	Needs Addressed	Housing
	Funding	CDBG: \$882,088 HOME: \$2,260,580

<p>Description</p>	<p>With CDBG and HOME funding in accordance with rules and regulations, assistance will be provided by the City directly to homebuyers, homeowners, renters, and developers, as well as to non-profits, for-profits or CHDOs to acquire and/or rehabilitate properties, eliminate blight, correct substandard conditions, make general repairs, improve energy efficiency, reduce lead paint hazards, and make emergency or accessibility repairs. May include: rehabilitation, acquisition/rehab/resale, refinance/rehab, demolition/site preparation, new construction, downpayment/closing cost assistance and housing counseling, and Tenant Based Rental Assistance. Housing units assisted will be single or multi-unit affordable housing to be sold, rented, or lease/purchased, as allowed by CDBG and HOME regulations. Beneficiaries of housing activities will be low to moderate income households as specified by HUD regulations. Other funding available includes program income generated by the respective revolving loan funds. Section 108 loans for eligible housing activities may be undertaken. Funding will also be utilized for project delivery costs and administration of housing programs, as allowed by CDBG and HOME regulations. Expected resources include 2019 entitlement and program income, as well as prior year entitlement and program income.</p>
<p>Target Date</p>	<p>6/30/2020</p>
<p>Estimate the number and type of families that will benefit from the proposed activities</p>	<p>It is estimated that the following beneficiaries will be served:</p> <ul style="list-style-type: none"> • Rental Units added: 2 • Owner occupied housing rehabilitated: 12 • Homeowner housing added: 3 • Direct financial assistance: 18 • Rental Assistance: XX
<p>Location Description</p>	<p>Housing programs are available citywide.</p>

	Planned Activities	<p>With CDBG and HOME funding in accordance with rules and regulations, assistance will be provided by the City directly to homebuyers, homeowners, renters, and developers, as well as to non-profits, for-profits or CHDOs to acquire and/or rehabilitate properties, eliminate blight, correct substandard conditions, make general repairs, improve energy efficiency, reduce lead paint hazards, and make emergency or accessibility repairs. May include: rehabilitation, acquisition/rehab/resale, refinance/rehab, demolition/site preparation, new construction, downpayment/closing cost assistance and housing counseling, and Tenant Based rental assistance. Housing units assisted will be single or multi-unit affordable housing to be sold, rented, or lease/purchased, as allowed by CDBG and HOME regulations. Beneficiaries of housing activities will be low to moderate income households as specified by HUD regulations. Other funding available includes program income generated by the respective revolving loan funds. Section 108 loans for eligible housing activities may be undertaken. Funding will also be utilized for project delivery costs and administration of housing programs, as allowed by CDBG and HOME regulations.</p> <p>Expected resources include 2019 entitlement and program income, as well as prior year entitlement and program income.</p>
3	Project Name	Economic Development
	Target Area	
	Goals Supported	Economic Development
	Needs Addressed	Economic Development
	Funding	CDBG: \$994,759

Description	Formulation, coordination, and implementation of local economic development strategies. Provide economic development assistance including loans, section 108 loans, loan guarantees, grants, microenterprise assistance , and infrastructure development to businesses locating to or expanding in Davenport and to businesses in need of assistance to retain jobs . Loans and grants provided will be for operating capital, acquisition, rehabilitation, demolition, slum blight prevention/removal. At least 51% of the jobs created or retained by the assisted businesses must be made available to low/moderate income people. Economic development assistance will also be provided to alleviate slum or blighted conditions in designated slum/blight areas or on individual slum/blight properties. Small business loan program will address the impact of the credit crunch and reduction of capital for business start-ups or expansion. Section 108 loans for eligible economic development activities may be undertaken. A percentage of staff costs will be covered by program income earned through the revolving loan fund. Expected resources include 2019 entitlement and program income, as well as prior year entitlement and program income.
Target Date	6/30/2020
Estimate the number and type of families that will benefit from the proposed activities	An estimated 5 businesses will be assisted, with at least 1 new job created or retained per \$20,000 in assistance through the Small Business Loan program or Downtown Davenport Jobs program. An estimated 5 businesses will also be assisted through the façade program.
Location Description	Economic Development activities are available citywide.

	Planned Activities	<p>Formulation, coordination, and implementation of local economic development strategies. Provide economic development assistance including loans, section 108 loans, loan guarantees, grants, microenterprise assistance, and infrastructure development to businesses locating to or expanding in Davenport, and to businesses in need of assistance to retain jobs. Loans and grants provided will be for operating capital, acquisition, rehabilitation, demolition, slum blight prevention/removal. At least 51% of the jobs created or retained by the assisted businesses must be made available to low/moderate income people. Economic development assistance will also be provided to alleviate slum or blighted conditions in designated slum/blight areas or on individual slum/blight properties. Small business loan program will address the impact of the credit crunch and reduction of capital for business start-ups or expansion. Section 108 loans for eligible economic development activities may be undertaken. A percentage of staff costs will be covered by program income earned through the revolving loan fund.</p> <p>Expected resources include 2019 entitlement and program income, as well as prior year entitlement and program income.</p>
4	Project Name	Infrastructure and Area Benefits
	Target Area	
	Goals Supported	Infrastructure and Area Benefits
	Needs Addressed	Infrastructure and Area Benefits
	Funding	CDBG: \$381,291
	Description	<p>Infrastructure and area benefits to benefit low to moderate households and areas, as allowed by CDBG regulations. This could include (but is not limited to) improvements to streets, sidewalks, gutters, sewer, alleys and other neighborhood improvements. Could also include prevention/elimination of blight through acquisition, demolition, rehabilitation, facade improvements, etc. Section 108 loans for eligible infrastructure and/or area benefit activities may be undertaken. Expected resources include 2019 entitlement and program income, as well as prior year entitlement and program income. Funds not utilized in the Infrastructure and Area Benefit project will be utilized in Project 2: Housing.</p>
	Target Date	6/30/2020

<p>Estimate the number and type of families that will benefit from the proposed activities</p>	<p>Because the beneficiaries are dependent on the area to be served, beneficiaries cannot be estimated until the areas to be assisted have been identified. For a placeholder in this plan, 300 households has been used. It is important to note, however, that this is only an estimate and actual number assisted may vary.</p> <p>Funds will be used to improve the availability and livability of affordable housing in Davenport neighborhoods.</p> <p>In any given year, the ability to complete infrastructure projects is dependent on funds available, eligible projects coming forward, and availability of public works staff and contractors to carry out the projects. Infrastructure projects may not be completed every year.</p> <p>In the current year, one activity begun in FY 2018 will still be underway at the start of 2019. Additionally, one project is being considered for approximately \$300,000. Entitlement or program income may be used for this project depending upon the availability of funds at the time of draw requests.</p>										
<p>Location Description</p>	<p>Infrastructure activities in support of affordable housing are available citywide.</p>										
<p>Planned Activities</p>	<p>Infrastructure and area benefits to benefit low to moderate households and areas, as allowed by CDBG regulations. This could include (but is not limited to) improvements to streets, sidewalks, gutters, sewer, alleys and other neighborhood improvements. Could also include prevention/elimination of blight through acquisition, demolition, rehabilitation, facade improvements, etc. Section 108 loans for eligible infrastructure and/or area benefit activities may be undertaken.</p> <p>Expected resources include 2019 entitlement and program income, as well as prior year entitlement and program income. Funds not utilized in the Infrastructure and Area Benefit project will be utilized in the Project 2: Housing.</p>										
<p>5</p>	<table border="1"> <tr> <td data-bbox="233 1472 521 1528"> <p>Project Name</p> </td> <td data-bbox="521 1472 1432 1528"> <p>Low-Mod Clientele and Public Services</p> </td> </tr> <tr> <td data-bbox="233 1528 521 1585"> <p>Target Area</p> </td> <td data-bbox="521 1528 1432 1585"></td> </tr> <tr> <td data-bbox="233 1585 521 1642"> <p>Goals Supported</p> </td> <td data-bbox="521 1585 1432 1642"> <p>Low-Mod Clientele and Public Services</p> </td> </tr> <tr> <td data-bbox="233 1642 521 1698"> <p>Needs Addressed</p> </td> <td data-bbox="521 1642 1432 1698"> <p>Low-Mod Clientele and Public Services</p> </td> </tr> <tr> <td data-bbox="233 1698 521 1753"> <p>Funding</p> </td> <td data-bbox="521 1698 1432 1753"> <p>CDBG: \$265,000</p> </td> </tr> </table>	<p>Project Name</p>	<p>Low-Mod Clientele and Public Services</p>	<p>Target Area</p>		<p>Goals Supported</p>	<p>Low-Mod Clientele and Public Services</p>	<p>Needs Addressed</p>	<p>Low-Mod Clientele and Public Services</p>	<p>Funding</p>	<p>CDBG: \$265,000</p>
<p>Project Name</p>	<p>Low-Mod Clientele and Public Services</p>										
<p>Target Area</p>											
<p>Goals Supported</p>	<p>Low-Mod Clientele and Public Services</p>										
<p>Needs Addressed</p>	<p>Low-Mod Clientele and Public Services</p>										
<p>Funding</p>	<p>CDBG: \$265,000</p>										

<p>Description</p>	<p>Funding for a variety of public service activities serving low to moderate income clientele has been proposed for this year, including: Youth services: Providing mentoring, counseling, child care, before and after school programs, and summer programs for low to moderate income families. Homeless and Transitional Housing: Provides shelter and transitional housing for homeless adults and families. Services also include advocacy, case management, referrals, service coordination, one-time crisis assistance to prevent homelessness, meal sites, and funding for the staff to implement these activities. Domestic Violence Services: Advocacy shelter provides assistance and shelter to victims of domestic violence. Legal Advocate provides assistance to survivors navigating the court system. Shelter staff provides crisis line, advocacy, and assistance to victims in obtaining safe shelter, food, clothing, medical attention, and basic needs. Program provides counseling, referrals, and legal assistance to victims of domestic violence. Provides community and prevention education programs to individuals age 3 to 18. Mental Illness Services: Provides support and case management for individuals with long term mental illness who are tenants in long term supportive housing units.</p> <p>Subsistence Payments: While the City generally would not fund subsistence payment programs, there may be situations where, on a short term basis in response to an emergency situation the City may fund such programs. An example of this would be funding for a program to assist eligible households that have experienced unexpected loss or reduction of income due to COVID-19 related layoffs.</p> <p>Expected resources include 2019 and earlier entitlement funds. Davenport does not typically draw program income for public service activities, as the vast majority of program income is generated by the housing and economic development revolving loan funds, and the program income stays with the revolving loan fund that generated it. However, the projected amount of program income to be earned during the program year is included in the calculation of the public service cap. In the unlikely event that a substantial amount of program income is generated outside of the revolving loan funds, that program income may be drawn against expenses in the public service activities if necessary to comply with federal regulations.</p>
<p>Target Date</p>	<p>6/30/2020</p>

Estimate the number and type of families that will benefit from the proposed activities	This year, applicants for funds have indicated that 1,279 individuals will be served.
Location Description	Services for low and moderate income residents and public services are available citywide.

<p>Planned Activities</p>	<p>Funding for a variety of public service activities serving low to moderate income clientele has been proposed for this year, including:</p> <ul style="list-style-type: none"> • Youth services: Providing mentoring, counseling, child care, before and after school programs, and summer programs for low to moderate income families. These programs provide social, physical, emotional, cultural and educational enrichment for low to moderate income children, primarily in the central city. • Homeless and Transitional Housing: Provides shelter and transitional housing for homeless adults and families. Services also include advocacy, case management, referrals, service coordination, one-time crisis assistance to prevent homelessness, meal sites, and funding for the staff to implement these activities. • Domestic Violence Services: Advocacy shelter provides assistance and shelter to victims of domestic violence. Legal Advocate provides assistance to survivors navigating the court system. Shelter staff provides crisis line, advocacy, and assistance to victims in obtaining safe shelter, food, clothing, medical attention, and basic needs. Program provides counseling, referrals, and legal assistance to victims of domestic violence. Provides community and prevention education programs to individuals age 3 to 18. • Mental Illness Services: Provides support and case management for individuals with long term mental illness who are tenants in long term supportive housing units. <p>Expected resources include 2019 and earlier entitlement funds. Davenport does not typically draw program income for public service activities, as the vast majority of program income is generated by the housing and economic development revolving loan funds, and the program income stays with the revolving loan fund that generated it. However, the projected amount of program income to be earned during the program year is included in the calculation of the public service cap. In the unlikely event that a substantial amount of program income is generated outside of the revolving loan funds, that program income may be drawn against expenses in the public service activities if necessary to comply with federal regulations.</p>
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AP-50 Geographic Distribution – 91.220(f)

Description of the geographic areas of the entitlement (including areas of low-income and minority concentration) where assistance will be directed

Funding for all projects is available citywide. However, there are some activities that may be carried out primarily or solely in certain areas of the City for a variety of reasons:

- **Housing:** Funding for housing programs offered by the City and its non –profit partners is available citywide. However, because of a concentration of low income households and older housing stock in older areas of the City, it can be expected that the majority of housing rehabilitation activities will take place in these areas. New development of affordable housing, both homeowner and rental, is also eligible citywide, and attempts will be made to encourage that development to take place outside of areas where it has traditionally been available, as suggested by the Analysis of Impediments to Fair Housing. Finally, though funding is available citywide, the City or its non-profit partners may from time to time offer targeted outreach in particular areas of the City, especially in those areas where redevelopment is anticipated to occur, to encourage better overall neighborhood quality in the area of new development. For example, this could include outreach for exterior grants in a neighborhood surrounding a new affordable apartment building under the umbrella of the existing housing rehabilitation program.
- **Economic Development:** Funding for economic development programs is available citywide. However, the City may from time to time offer targeted outreach in particular areas of the City, especially in those areas where redevelopment is anticipated to occur, to encourage better overall neighborhood quality in the area of redevelopment. For example, this could include outreach grants to businesses opening in smaller commercial/retail districts or other areas of the City that are underinvested.
- **Infrastructure and Area Benefits:** Funding for infrastructure offered by the City is available citywide. However, because of a concentration of low income households and older housing stock in older areas of the City, it can be expected that the majority of infrastructure activities will take place in these areas. New development of affordable housing, both homeowner and rental, is also eligible citywide, and attempts will be made to encourage that development to take place outside of areas where it has traditionally been available, as suggested by the Analysis of Impediments to Fair Housing. When that development takes place in an area with older or failing infrastructure, and the area would meet HUD criteria for low to moderate area benefits, infrastructure improvements and blight removal in the area may be offered in support of the housing activities.
- **Low-Mod Clientele and Public Services:** Funding for public service programs offered by the City's non –profit partners is available citywide. However, because of a concentration of low income households in older areas of the City, it can be expected that the majority of public service activities will take place in these areas. Public service providers are encouraged to provide

services to all low to moderate income residents regardless of their location in the City.

Geographic Distribution

Target Area	Percentage of Funds

Table 8 - Geographic Distribution

Rationale for the priorities for allocating investments geographically

In preparing this plan, the public input process revealed that 75% of survey respondents support targeting funds in low to moderate income areas. A review of the Analysis of Impediments to Fair Housing and the Housing Needs Assessment both indicated that the City should continue to balance investment between older areas of the city with higher concentrations of low income and minority residents and making new affordable housing opportunities available in parts of the City where they have not traditionally been present.

In attempting to balance those needs, the City has chosen to make all programs available citywide, so that the largest group of eligible residents may take advantage of them. However, the nature of certain activities means that the benefits of these activities are likely to be concentrated in low to moderate income areas. Examples of programs likely to be most utilized in older areas are:

- housing rehabilitation programs, which will likely benefit homeowners in areas of the city with the oldest and least well maintained housing stock,
- public service programs, which are likely to benefit areas where low to moderate income households are most concentrated,
- infrastructure activities, which will likely benefit areas of the city with the oldest infrastructure. When affordable housing development takes place in a low/mod area with older or failing infrastructure, non-maintenance supplemental infrastructure improvements in the area may be offered in support of neighborhood revitalization in the vicinity of the housing activities.
- Blight removal, which will likely benefit areas of the city with the oldest and least well maintained buildings.

Discussion

Affordable Housing

AP-55 Affordable Housing – 91.220(g)

Introduction

The instructions for this section state that these households supported goals are not to include emergency shelter, transitional shelter, or social services. Instead, these numbers are only to include units that are reserved for homeless individuals and families. No new units of this type are anticipated this year.

Therefore, all the produced, rehabilitated, and acquired units shown in the second table are included in the first table as Non-Homeless units. These units represent estimated households to be assisted through the City's Housing fund.

In the second table, the new units to be produced include newly assisted rental and owner occupied units, rehabed units include homes assisted through the CDBG and HOME programs, and acquisition of existing units includes households supported with downpayment assistance.

One Year Goals for the Number of Households to be Supported	
Homeless	0
Non-Homeless	35
Special-Needs	0
Total	35

Table 9 - One Year Goals for Affordable Housing by Support Requirement

One Year Goals for the Number of Households Supported Through	
Rental Assistance	0
The Production of New Units	5
Rehab of Existing Units	12
Acquisition of Existing Units	18
Total	35

Table 10 - One Year Goals for Affordable Housing by Support Type

Discussion

The instructions for this section state that these households supported goals are not to include emergency shelter, transitional shelter, or social services. Instead, these numbers are only to include units that are reserved for homeless individuals and families. No new units of this type are anticipated this year.

Therefore, all the produced, rehabilitated, and acquired units shown in the second table are included in the first table as Non-Homeless units. These units represent estimated households to be assisted

through the City's Housing fund.

In the second table, the new units to be produced include newly assisted rental and owner occupied units, rehabed units include homes assisted through the CDBG and HOME programs, and acquisition of existing units includes households supported with downpayment assistance.

AP-60 Public Housing – 91.220(h)

Introduction

Davenport Office of Assisted Housing (OAH) has made application for 2019 Public Housing Capital Fund Program funding from HUD for an amount of roughly \$83,000 (award based on available funds from HUD, to be awarded in or around August of 2019) for continued operation of existing scattered site public housing units. OAH's available units offer a wide range of housing options for families of different sizes and with different needs.

The scattered sites are scheduled for HVAC replacement in Fiscal Year 2020.

Actions planned during the next year to address the needs to public housing

OAH will continue to pull applicants from the waiting list as needed. There are a generous amount of applications at this time and therefore the waiting list is closed. Once all applications have been exhausted the waiting list will be reopened to future applicants.

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

OAH works proactively with tenants on property maintenance and responds to suggestions or requests for unit upgrades as funding allows. Tenants are encouraged to make use of community resources and other City of Davenport programs to help them become more self-sufficient and good candidates for home ownership, although tenants typically enjoy a high quality of housing in our program and turnover is therefore very low.

If the PHA is designated as troubled, describe the manner in which financial assistance will be provided or other assistance

The public housing authority is not designated as troubled.

Discussion

AP-65 Homeless and Other Special Needs Activities – 91.220(i)

Introduction

The governing body for homeless service planning for the State of Iowa is the Iowa Council on Homelessness. This organization was established in Iowa Code 16.00A in 2008. The Iowa Council serves as the HUD designated primary decision making group and oversight board of the Iowa Balance of State CoC for the Homeless (IA-501). The Iowa Council on Homelessness is comprised of a 38 volunteer member appointed planning and advisory board. On the local planning level, the Scott County Shelter and Transitional Housing Council (SCSTHC) is comprised of 22 local organizations, local and county government representatives that provide housing and supportive services to the community's homeless persons and persons at risk of becoming homeless. The term Non-Homeless Special Needs is a term defined by HUD and located in the Consolidated Planning regulations at 24 CFR 91.205(d)(1). Per HUD definition, this category is defined as "... people who are not homeless but require supportive housing, including the elderly, frail elderly, persons with disabilities (mental, physical, developmental), persons with alcohol or other drug addiction, persons with HIV/AIDS and their families, public housing residents, and any other category the jurisdiction may specify..." Per HUD regulations, the City must include an assessment of housing needs for this category in the Annual Action Plan, and it is in this context that the term is used.

Describe the jurisdictions one-year goals and actions for reducing and ending homelessness including

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

The Quad City Shelter and Transitional Housing Council is comprised of local nonprofit organizations, county, and local government representatives. Agencies collaborate in mutual referrals and resources, using the Service Prioritization Decision Assistance Tool (SPDAT) at intake, to identify the programs and services best aligned to end the family/individual homelessness. This collaboration utilizes the coordinated entry approach to serving persons who are homeless or at risk of being homeless and The Salvation Army Family Center serves as the lead agency for coordinated entry in Scott County, Iowa. The Quad City Shelter and Transitional Housing Council participates in the annual Point-in-Time (PIT) in January which is a nationwide count of sheltered and unsheltered homeless persons.

Addressing the emergency shelter and transitional housing needs of homeless persons

The multi-faceted Quad City Shelter and Transitional Housing Council provides emergency shelter, transitional housing, permanent housing, affordable housing and mainstream supportive services. The Council identifies gaps in housing services and researches solutions to those gaps by utilizing the expertise of those agencies that have successfully provided housing and mainstream services to

homeless persons.

Helping homeless persons (especially chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth) make the transition to permanent housing and independent living, including shortening the period of time that individuals and families experience homelessness, facilitating access for homeless individuals and families to affordable housing units, and preventing individuals and families who were recently homeless from becoming homeless again

The Iowa Council identified a need for consistent Iowa standards for homeless operations, services and performance. Driven by new HUD regulations, the Iowa Council outlined its strategy for establishing commonality and consistency in operational practices, services, and performance measures for organizations and programs with a focus on housing needs and services including coordinated entry and housing first components.

Helping low-income individuals and families avoid becoming homeless, especially extremely low-income individuals and families and those who are: being discharged from publicly funded institutions and systems of care (such as health care facilities, mental health facilities, foster care and other youth facilities, and corrections programs and institutions); or, receiving assistance from public or private agencies that address housing, health, social services, employment, education, or youth needs.

For both homelessness prevention and rapid re-housing, case management includes identification, assessment, planning, resource acquisition, stabilization, and support. To ensure those at most risk of becoming homeless are identified and referred to agencies that have openings, Scott County and Rock Island County in Illinois have created a combined coordinated entry approach to serving individuals and families who are at risk of becoming homeless.

Discussion

AP-75 Barriers to affordable housing – 91.220(j)

Introduction:

In 2013, the City of Davenport completed an updated Analysis of Impediments to Fair Housing. The Analysis of Impediments to Fair Housing contained several suggested action items:

- Improve Affirmative Marketing and Site Selection Policies,
- Increase the availability of affordable accessible units,
- Increase consideration of fair housing in the comprehensive planning process, multifamily development, and zoning processes.
- Amend the Housing Commission admissions and Management plans.

The Analysis of Impediments to Fair Housing recommended that the City continue its strategy of balancing housing investments between revitalizing older areas and developing new affordable housing where it has not been traditionally available.

The City of Davenport was in the process of creating an Assessment of Fair Housing (AFH) in a regional collaboration with the cities of Moline and Rock Island, Illinois. On January 5, 2018, HUD issued a notice in the Federal Register extending the deadline for submission of the AFH until the next AFH submission deadline that falls after October 31, 2020. For Davenport, that next deadline will not be until October 2024. The notice instructed entitlement communities to instead complete updated Analysis of Impediments to Fair Housing. Davenport is currently in the process of completing an updated AI, compliant with the updated AI guidance in the HUD notice. Davenport is the lead agency in this effort, which will include the two nearby entitlement cities of Moline and Rock Island, Illinois. This effort is expected to be completed prior to the submission of the next five year Consolidated Plan (2020-2024), and will inform future planning activities upon completion.

Actions it planned to remove or ameliorate the negative effects of public policies that serve as barriers to affordable housing such as land use controls, tax policies affecting land, zoning ordinances, building codes, fees and charges, growth limitations, and policies affecting the return on residential investment

As described elsewhere in this plan, the City of Davenport intends to continue to balance federal investments between revitalizing older areas and developing new affordable housing where it has not been traditionally available.

In addition to this strategy, the City intends to review the newly updated Analysis of Impediments to Fair Housing action plan to consider ways to increase the consideration of fair housing issues in the comprehensive planning and zoning process.

The City will also review required documents for HUD funded programs to ensure that all requirements

are being met regarding fair housing.

Finally, the City will continue to meet all applicable requirements for HUD funded housing with regards to accessibility.

As described above, the City incorporated the January 5, 2018 guidance from HUD produce an updated Analysis of Impediments (AI) instead of an AFH, per HUD's instruction. The updated AI will be used to inform future activities regarding fair housing.

Discussion:

AP-85 Other Actions – 91.220(k)

Introduction:

Actions planned to address obstacles to meeting underserved needs

In meeting underserved needs, the largest obstacle remains the availability of funding to address needs. CDBG funding available for this program year has declined by 33% from the highest funding year and HOME funding has declined by 47%, even while the need has stayed the same or grown.

Because funding is not available to meet all needs, the Citizens' Advisory Committee, which is responsible for evaluating applications and awarding funding, has put in place an evaluation process that places a higher point value on closely addressing the identified local objectives and on compliance and performance in carrying out funded activities. In this way, the CAC is attempting to use the limited federal dollars available in the most efficient manner.

In addition to availability of funding, eligible non-profit partners in the community must bring forward applications for programs to meet identified needs and local objectives. For example, in the current program year, no applications were received for transportation or financial literacy programs, though those are needs identified through the planning process. In the absence of an eligible applicant to carry out these activities, the City is unable to consider funding for fund them in the current program year.

Actions planned to foster and maintain affordable housing

As described elsewhere in the consolidated plan, CDBG and HOME funding in accordance with rules and regulations will be provided by the City directly to homeowners, renters, and developers, as well as to non-profits, for-profits or CHDOs to acquire and/or rehabilitate properties, correct substandard conditions, make general repairs, improve energy efficiency, reduce lead paint hazards, and make emergency or accessibility repairs. This may include: acquisition/rehab/resale, refinance/rehab, demolition/site preparation, new construction, downpayment/closing cost assistance and housing counseling, and Tenant Based Rental Assistance. Housing units assisted will be single or multi-unit affordable housing to be sold, rented, or lease/purchased, as allowed by CDBG and HOME regulations. Beneficiaries of housing activities will be low to moderate income households as specified by HUD regulations. Other funding available includes program income generated by the respective revolving loan funds. Funding will also be utilized for project delivery costs and administration of housing programs, as allowed by CDBG and HOME regulations.

Actions planned to reduce lead-based paint hazards

All of the housing rehabilitation programs offered by the City and subrecipient agencies adhere to lead based paint regulations. This includes programs for homeownership, where homes are acquired,

rehabilitated and sold to eligible households; as well as owner occupied rehabilitation programs for households that already own their homes. In both programs, federal funding is utilized to remediate or abate lead hazards as appropriate according to regulations. In all rehabilitation projects, lead safe work practices are used at all times when lead is present.

In addition to rehabilitating existing housing, the City was encouraged by the Analysis of Impediments to Fair Housing to continue to balance federal investments between the revitalization of older areas and the provision of new housing opportunities outside of areas where they have traditionally been available. In continuing this strategy, the City has funded the construction of a variety of new housing units, both owner occupied and rental, that will obviously be lead free by virtue of the fact that lead based paint is no longer produced or allowed.

Rehabilitation programs are available to families with lead poisoned children as well. Such families are referred by the Scott County Health Department at their discretion when they are detected. Because the State of Iowa has mandated that all children entering kindergarten be tested for lead based paint, the incidence of lead poisoning among children is now one that can be detected and addressed earlier.

Actions planned to reduce the number of poverty-level families

The City anticipates allocating CDBG funds to activities that assist in reducing the number of poverty level families in Davenport. In the past, the City has funded programs that assist poverty level families. These programs have included:

- economic development activities that create or retain jobs for low to moderate income workers and/or business owners,
- a transportation program for low/mod individuals and families,
- transitional housing and supportive services for low to moderate income single parents
- public service activities that support mentoring, after school, and summer programs for low to moderate income children

All of the activities funded through the CDBG and HOME programs are available to poverty level families, and the City has sought to balance the investment of federal funds between activities that benefit extremely low income families through a comprehensive set of projects:

- economic development activities that benefit low to moderate income business owners and employees in creating or retaining jobs,
- public service activities for families that need access to supportive services and enrichment activities,
- homeownership and rehabilitation opportunities for families that would like to purchase or improve a home,
- rental development to ensure an adequate supply of decent, affordable housing for those who

cannot afford or are not ready for homeownership

- Infrastructure activities in support of affordable housing to improve the livability and sustainability of older neighborhoods with higher levels of low income residents.

As important as reducing the number of poverty level families is the attempt to prevent more from developing. While the City generally would not fund Tenant Based Rental Assistance and/or subsistence payment programs, there may be situations where, on a short term basis in response to an emergency situation the City may fund such programs. An example of this would be funding for programs to assist eligible households that have experienced unexpected loss or reduction of income due to COVID-19 related layoffs. Funding such programs on a short term basis would prevent these households from losing their current housing and reduce the strain on other public and social services.

While many of these programs provide services to families who are low to moderate income, the intention is that, particularly through economic development, affordable homeownership, and child care and enrichment activities that families will be able to utilize their saved or gained resources to take the step out of poverty. In particular, youth programs funded through CDBG are intended to build life skills by providing resources, mentoring, and enrichment to young residents that help to break the cycle of poverty.

Actions planned to develop institutional structure

No gaps were identified in the institutional structure and service delivery system through the public input process. However, a need was identified for additional housing units affordable to households with very low incomes. That need is eligible to be addressed with unit production through the HOME program, and the City intends to address that need as funding is available and development opportunities arise.

Actions planned to enhance coordination between public and private housing and social service agencies

The City of Davenport works with a variety of groups to coordinate plan activities:

- The City serves as a member of the Scott County Housing Council, the Scott County Housing Cluster, the Scott County Shelter and Transitional Housing Council, and the Continuum of Care. All of these groups conduct activities that address the housing needs of low and moderate income residents, including both homeless and non-homeless individuals and those with non-homeless special needs. These groups meet monthly. These groups represent a combined total of 76 public, private, and non-profit agencies serving Davenport residents.
- Through the CDBG program, the City funds a variety of subrecipients that serve these

populations in the public service category. Comprised of eight agencies operating eight public services CDBG funded programs, these subrecipients represent a wide variety of public, private and social service agencies.

The City intends to continue to hold membership on these boards and commissions. In addition, the City intends to continue funding subrecipients as applications for funding are submitted and resources permit. These entities have been invited to participate in public input process in the past, and the City anticipates continuing to include them in the future.

Discussion:

Program Specific Requirements

AP-90 Program Specific Requirements – 91.220(l)(1,2,4)

Introduction:

In question 5 below, it states that the City should "specify the years covered that include this annual action plan." However, in the template provided by HUD, there is not a box to enter the years. Therefore, the years are being entered here for question 5. The specified program years are 2018, 2019 and 2020. This covers the period from July 1, 2018 through June 30, 2021.

**Community Development Block Grant Program (CDBG)
Reference 24 CFR 91.220(l)(1)**

Projects planned with all CDBG funds expected to be available during the year are identified in the Projects Table. The following identifies program income that is available for use that is included in projects to be carried out.

1. The total amount of program income that will have been received before the start of the next program year and that has not yet been reprogrammed	0
2. The amount of proceeds from section 108 loan guarantees that will be used during the year to address the priority needs and specific objectives identified in the grantee's strategic plan.	0
3. The amount of surplus funds from urban renewal settlements	0
4. The amount of any grant funds returned to the line of credit for which the planned use has not been included in a prior statement or plan	0
5. The amount of income from float-funded activities	0
Total Program Income:	0

Other CDBG Requirements

1. The amount of urgent need activities	0
---	---

2. The estimated percentage of CDBG funds that will be used for activities that benefit persons of low and moderate income. Overall Benefit - A consecutive period of one, two or three years may be used to determine that a minimum overall benefit of 70% of CDBG funds is used to benefit persons of low and moderate income. Specify the years covered that include this Annual Action Plan.

0.00%

**HOME Investment Partnership Program (HOME)
Reference 24 CFR 91.220(I)(2)**

1. A description of other forms of investment being used beyond those identified in Section 92.205 is as follows:

The City of Davenport does not anticipate dedicating any additional forms of investment not listed in 92.205. Developers applying for funds may bring investment from other sources that cannot yet be identified.

2. A description of the guidelines that will be used for resale or recapture of HOME funds when used for homebuyer activities as required in 92.254, is as follows:

The City does utilize HOME funds for homebuyer projects. The City will utilize a covenant to record the recapture restrictions. The text of the covenant appears in the Attachments section, as character limits did not allow for it to be reproduced in HUD provided template

3. A description of the guidelines for resale or recapture that ensures the affordability of units acquired with HOME funds? See 24 CFR 92.254(a)(4) are as follows:

The City does not currently utilize HOME funds for acquisition programs. However, if funds were used for this activity, the City would utilize the same covenant as described above, which can be reviewed in the attachments section.

4. Plans for using HOME funds to refinance existing debt secured by multifamily housing that is rehabilitated with HOME funds along with a description of the refinancing guidelines required that will be used under 24 CFR 92.206(b), are as follows:

The City does not currently utilize HOME funds for refinancing of multifamily housing debt for housing that is rehabilitated with HOME funds, nor does it intend to do so in this plan year. However, if the City does agree to consider refinancing existing debt for multi-family housing, it

would follow the minimum underwriting standards described at 24 CFR 92.206(b), which are:

- HOME funds would be loaned only in the event that the refinancing is necessary to permit or continue the affordability of the units.
- Regardless of the amount of HOME funds invested, the minimum affordability period shall be 15 years.
- The minimum guidelines are:
- Application will demonstrate that rehabilitation is the primary eligible activity and ensure that this requirement is met by establishing a minimum level of rehabilitation per unit or a required ratio between rehabilitation and refinancing; City Staff will review management practices to demonstrate that disinvestment in the property has not occurred, that the long term needs of the project can be met and that the feasibility of serving the targeted population over an extended affordability period can be demonstrated; Application will state whether the new investment is being made to maintain current affordable units, create additional affordable units, or both; Agreement will specify the required period of affordability, whether it is the minimum 15 years or longer; Application for HOME funds will be eligible jurisdiction-wide; and Agreement will state that HOME funds cannot be used to refinance multifamily loans made or insured by any Federal program, including CDBG.

Attachments

Citizen Participation Comments

Groups Invited to Participate

Quad City Shelter and Transitional Housing Council Membership List

Bethany for Children and Families
Center for Alcohol and Drug Services (CADS)
Center for Active Seniors (CASI)
Community Health Care (CHC)
Christian Care
City of Davenport
DeLaCerde House
Family Resources SafePath Survivor Resources
Goodwill of the Heartland
HELP Regional Office of Iowa Legal Aid
Humility Homes and Services
Open Door
One Eighty
Project NOW
Rick's House of Hope
Scott County Community Services
Scott County Housing Council
Supplemental Emergency Assistance Program (SEAP)
St. Joseph the Worker House
The Salvation Army
Unity House
Vera French

22 Total Groups

Scott County Housing Cluster/ Scott County Housing Council Membership List

Bank Orion
Bethany for Children and Families
Blackhawk Bank and Trust
Brain Injury Association of Iowa
Build to Suit, Inc.
CBI Bank and Trust
Christian Care
City of Bettendorf
City of Davenport
Community Action of Eastern Iowa
Community Housing Services
DeLaCerde House, Inc.
Doris and Victor Day Foundation
East Bluff Neighborhood Association
Ecumenical Housing Development Group
Fairness in Rural Lending
Family Resources
Freedom Homes Ministries
Gateway Redevelopment Group
Genesis Health System
Great Southern Bank
Habitat for Humanity
Handicapped Development Center
Hilltop Campus Village
Humility Homes and Services
IH Mississippi Valley Credit Union
IL/IA Center for Independent Living
Interfaith Housing Ltd
Iowa Open Door
King's Harvest, Inc.
Modern Woodman Bank
NHS of Davenport
Project NOW, Inc.
Quad City Bank and Trust
Quad Cities Community Foundation
Regional Development Authority
Riverside UMC
Rock Island Economic Growth
Rock Island Housing Authority
Salvation Army of the Quad Cities
Scott County Health Department
Scott County Housing Council
Scott County Planning and Zoning
Second Chance Housing
Southeast National Bank
St. Joseph the Worker House

St. Paul Lutheran Church
The Arc of the Quad Cities Area
Triumph Community Bank
U S Bank
United Way of the QC
Vera French Housing Corp.
Vibrant Credit Union
Wells Fargo Bank

54 Total Groups

Neighborhood Groups Contacted to Participate

Blackhawk Square
Brady Street Bunch
Bridge to Ridge
Carriage Hill/Fernwood NW
Cedar Hill Neighborhood Watch
Central Forest NW
Colorado Street NW
Duck Creek Corners Neighborhood
Eagle Eye NW
East 18th St NW
East 33rd St. NW
East Bluff NA
East Central NG
East Side NA
Fejevary Neighbors NWA
Garden Addition N Assoc
Glen Armit NW
Gold Coast & Hamburg Historic District Association
Goose Creek Heights NA
Green Acres
Hancock
Heatherton NA
Highland Neighborhood Watch Group
Hill Top NW
Historic Washington Street
Jersey Farms NA
Jersey Meadows
Lincoln Neighbors
Lorton Meadows
Madison Circle NW
Marycrest NW
McClellan Heights NW
Meadow Crest NW
N Nevada NW
Neighbors of Prospect Park
Northwest Rollers
Norwood Park NA
Oakbrook Commons
Oakbrook North
Prospect Park NW
Redwood Neighborhood WG
South Vanderveer NA
Southwest Gateway
Vanderveer Historic NA
W 16th & 17th NW
W 30th NW

W 68th St NW
West Colorado NW
West of West NW
Windsor Crest Club, Inc.
Windsor Pine NW

31 Total Groups

**Summary of
Survey and Public Input Meeting Comments**

Summary of Year 45 Public Input Meeting Themes

The Year 45 public input meetings were held in September, 2018:

- Tuesday, September 25, 2018; 10:00-11:30am and 3:00- 4:30pm Heritage Community Room
- Thursday, September 27, 2018; 5:30-7:30pm Fairmount Library

The meetings were organized as open house style events with stations that the attendees could visit to engage with City Staff on a variety of topics by completing tasks:

- Station 1: Check in
 - Information was provided to attendees about the CDBG program and eligible activities that can be funded by the program.
- Station 2: Map
 - Attendees were asked to view a map of Davenport and place stickers in the areas of the city that had the greatest need for affordable housing, economic development, infrastructure, and public services.
 - Attendees at all meeting placed the majority of their stickers in the areas labeled area C and area D, which are the areas of town south of Kimberly Road. These areas tend to be the neighborhoods with the oldest housing stock/infrastructure and with the higher concentration of lower income and minority households.
- Station 3: Beads
 - Attendees were given seven beads to use to vote for different programs needed in the community. There were six white beads and one blue bead. Cups were arranged into groups depending on whether the programs are considered by HUD to fall under the program services cap or not. Only blue beads could be placed into the public service cups to represent the 15% public service cap imposed by CDBG regulations. Any color beads could be placed into the non-public service cups.
 - Across all four meetings, Affordable housing (44) was the most selected need overall, and was the most selected non-public service need, followed by infrastructure (23) and Economic Development (19). The most commonly selected public service need was assistance for the physically and mentally disabled (5), followed by Homeless Shelters and Services for HIV/AIDS (2 each).
- Station 4: Comment Cards
 - Participants were provided with comment cards to fill out if they would prefer to make a written comment rather than speak to a staff member. No written comments were received.

The following is a summary of the Year 45 public input survey

The housing breakdown of respondents:

Homeowners – 89 (78.1%)
Renter – 24 (21.1%)
Skipped Question – 1 (0.9%)

The location breakdown of respondents:

52801 – 4 (3.5%)
52802 – 11 (9.6%)
52803 – 38 (33.3%)
52804 – 17 (14.9%)
52805 – 0 (0.0%)
52806 – 17 (14.9%)
52807 – 21 (18.4%)
52808 – 0 (0.0%)
52809 – 0 (0.0%)
Outside Davenport – 5 (4.4%)
Skipped Question – 1 (0.9%)

Best way to improve neighborhoods:

Increasing Neighborhood Infrastructure, Quality, and Safety.....40.2%
Increasing Affordable Housing.....28.2%
Increasing Employment and Business Opportunities.....24.3%
Increasing Public Services to Low-Moderate Income Residents.....8.3%

Community priorities:

67.1% of survey respondents viewed affordable housing as being the highest priority service for community improvement, followed by services for youth K-6th at 48.5%, and services for youth 7th-12th at 34.1%.

43.6% of survey respondents view assistance for the physically and mentally handicapped as the most important medium priority, followed by survivors of domestic abuse at 46.7%.

Focusing funds:

75.5% of survey respondents are in favor of fund focusing.

The top three services respondents use are:

Davenport Parks – 68 (59.7%)
Family Resources – 13 (11.4%)
Vera French – 11 (9.7%)

10 respondents also marked that they use other services not included in the survey. These services were:

Humility of Mary
Riverbend Transit
Food Pantries
Libraries

33 (29.0%) of respondents also marked that they do not use any of the services included in the survey

Areas in need of assistance (see map on next page):

The area considered the most in need of housing improvement is area D, at 75.9%, followed by area C at 14.8%.

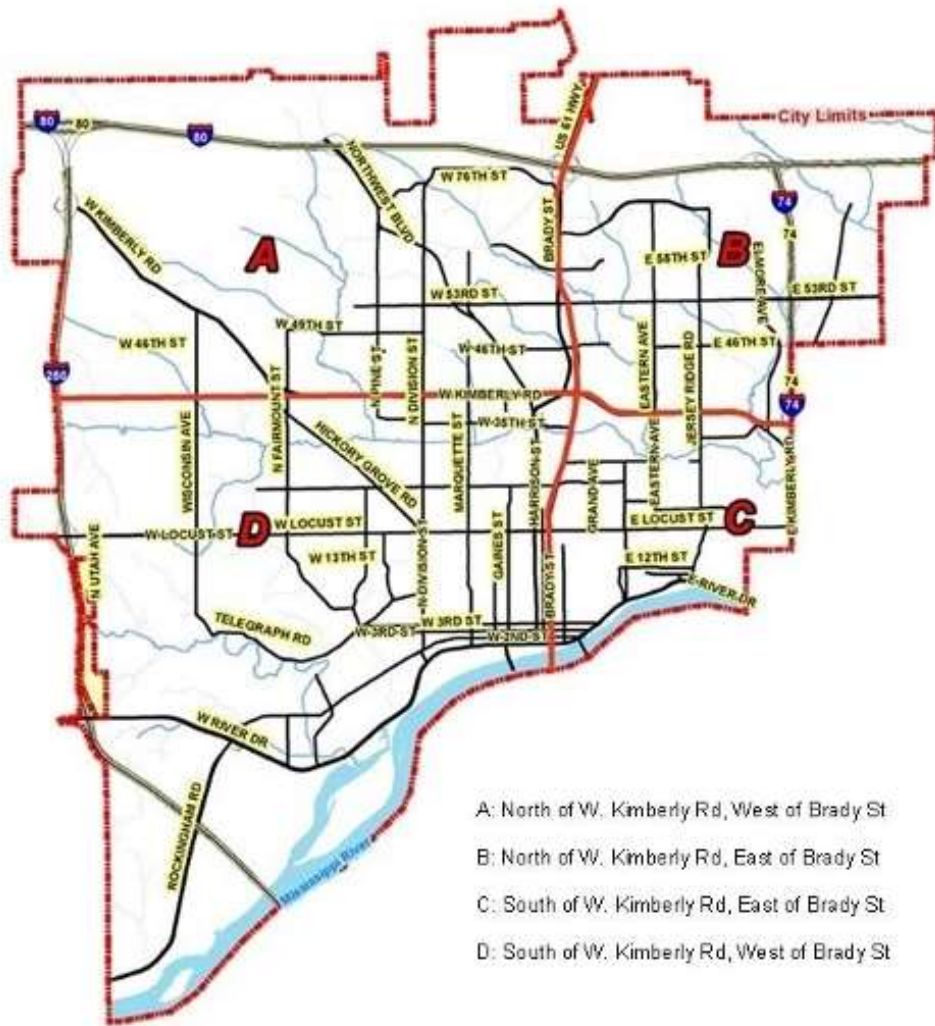
The area considered most in need of employment and business improvements is again area D, at 71.3%, followed again by C at 17.6%.

The area considered most in need of neighborhood quality and safety improvements is again D at 71.6%, followed again by C at 26%.

The area considered most in need of an increase in low-mod public services is again D, at 71.4%, follow again by C at 17.1%.

We can conclude that area D is viewed as the most in need of improvement, while area B is least in need of improvement.

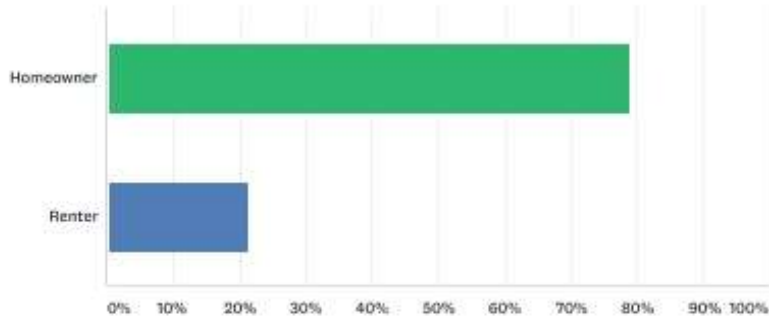
Additional comments on the survey pointed out a need for improving public infrastructure and transportation, youth and education services, and business/economic development. These comments are consistent with the rankings of neighborhood improvement methods, as well as improvement priorities.



- A: North of W. Kimberly Rd, West of Brady St
- B: North of W. Kimberly Rd, East of Brady St
- C: South of W. Kimberly Rd, East of Brady St
- D: South of W. Kimberly Rd, West of Brady St

Q1 I am a:

Answered: 113 Skipped: 1



ANSWER CHOICES	RESPONSES	
Homeowner	78.76%	89
Renter	21.24%	24
Total Respondents: 113		

Q2 My Zip Code is:

Answered: 113 Skipped: 1

#	RESPONSES	DATE
1	52802	9/27/2018 2:07 PM
2	52806	9/27/2018 10:40 AM
3	52807	9/27/2018 8:53 AM
4	52803	9/27/2018 7:12 AM
5	52803	9/26/2018 4:14 PM
6	52722	9/26/2018 3:37 PM
7	52807	9/26/2018 1:46 PM
8	52803	9/26/2018 1:04 PM
9	52804	9/26/2018 11:43 AM
10	52802	9/26/2018 11:22 AM
11	52802	9/26/2018 10:57 AM
12	52803	9/26/2018 10:26 AM
13	52803	9/25/2018 10:18 PM
14	52807-1541	9/25/2018 1:30 PM
15	52807	9/24/2018 8:14 PM
16	52803	9/24/2018 4:41 PM
17	52803	9/24/2018 3:33 PM
18	52803	9/24/2018 1:40 PM
19	52803	9/24/2018 1:31 PM
20	52803	9/24/2018 12:51 PM
21	52803	9/24/2018 12:49 PM
22	52803	9/24/2018 12:48 PM
23	52806	9/23/2018 5:09 AM
24	52807	9/19/2018 6:16 PM
25	52806	9/19/2018 1:20 AM
26	52803	9/18/2018 10:52 AM
27	52803	9/17/2018 1:01 PM
28	52753	9/16/2018 12:06 PM
29	52802	9/16/2018 10:17 AM
30	52807	9/14/2018 9:48 PM
31	52804	9/14/2018 12:40 PM
32	52804	9/14/2018 9:51 AM
33	52806	9/14/2018 6:38 AM
34	52803	9/13/2018 10:18 PM
35	52803	9/13/2018 8:05 PM

City of Davenport - Community Input Survey 2018

SurveyMonkey

36	52804	9/13/2018 3:12 PM
37	52807	9/13/2018 12:18 PM
38	52801	9/13/2018 9:20 AM
39	52801	9/13/2018 9:05 AM
40	52806	9/13/2018 7:52 AM
41	52803	9/12/2018 9:49 PM
42	52807	9/12/2018 9:25 PM
43	52807	9/12/2018 6:36 PM
44	52804	9/12/2018 4:41 PM
45	52804	9/12/2018 4:21 PM
46	52806	9/12/2018 4:14 PM
47	52807	9/12/2018 3:36 PM
48	52806	9/12/2018 3:35 PM
49	52804	9/12/2018 2:32 PM
50	52804	9/12/2018 2:31 PM
51	52803	9/12/2018 2:15 PM
52	52807	9/12/2018 1:53 PM
53	52806	9/12/2018 1:47 PM
54	52807	9/12/2018 1:29 PM
55	52802	9/12/2018 12:49 PM
56	52803	9/12/2018 12:22 PM
57	52803	9/12/2018 12:21 PM
58	52803	9/12/2018 12:03 PM
59	52803	9/12/2018 12:03 PM
60	52807	9/12/2018 11:52 AM
61	52803	9/12/2018 11:46 AM
62	52804	9/12/2018 11:44 AM
63	52803	9/12/2018 11:34 AM
64	52803	9/12/2018 11:18 AM
65	52807	9/12/2018 11:09 AM
66	52803	9/12/2018 11:07 AM
67	52806	9/12/2018 11:02 AM
68	52803	9/11/2018 4:33 PM
69	52806	9/11/2018 3:04 PM
70	52806	9/11/2018 1:03 PM
71	61282	9/11/2018 12:50 PM
72	52806	9/11/2018 12:00 PM
73	52804	9/11/2018 11:47 AM
74	52804	9/11/2018 10:30 AM
75	52807	9/11/2018 9:04 AM
76	52804	9/10/2018 9:12 AM

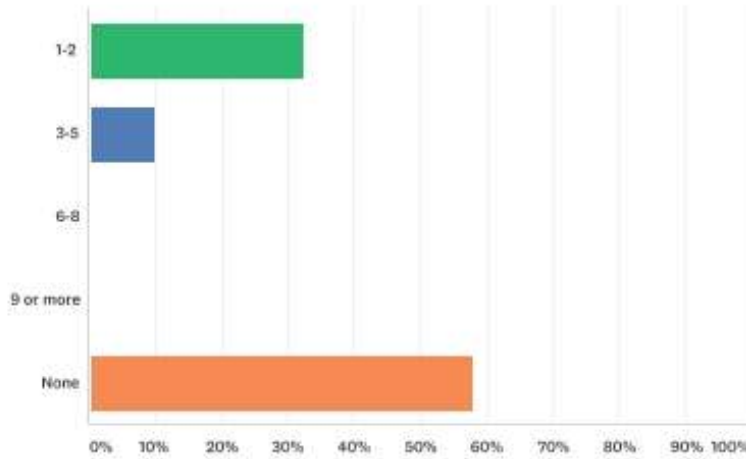
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77	52802	9/9/2018 11:19 AM
78	52801	9/8/2018 12:58 PM
79	52801	9/8/2018 12:58 PM
80	52802	9/7/2018 11:56 AM
81	52802	9/7/2018 11:45 AM
82	52806	9/5/2018 8:28 AM
83	52804	9/5/2018 8:18 AM
84	52803	9/4/2018 9:15 PM
85	61201	9/4/2018 12:07 PM
86	52807	9/4/2018 10:11 AM
87	52807	9/4/2018 9:46 AM
88	52803	9/4/2018 8:03 AM
89	52803	9/3/2018 11:10 AM
90	52804	9/1/2018 6:49 PM
91	52804	9/1/2018 5:36 PM
92	52803	9/1/2018 11:36 AM
93	52806	9/1/2018 9:50 AM
94	52803	9/1/2018 7:07 AM
95	52802	8/31/2018 4:09 PM
96	52806	8/31/2018 2:49 PM
97	52804	8/31/2018 11:38 AM
98	52807	8/31/2018 8:50 AM
99	52803	8/31/2018 7:39 AM
100	52722	8/31/2018 6:24 AM
101	52804	8/31/2018 6:20 AM
102	52806	8/31/2018 6:14 AM
103	52807	8/31/2018 6:07 AM
104	52803	8/30/2018 5:37 PM
105	52803	8/30/2018 2:04 PM
106	52803	8/30/2018 1:55 PM
107	52806	8/30/2018 1:46 PM
108	52807	8/30/2018 1:29 PM
109	52803	8/30/2018 1:25 PM
110	52802	8/30/2018 1:23 PM
111	52803	8/30/2018 1:19 PM
112	52807	8/30/2018 1:11 PM
113	52802	8/30/2018 1:11 PM

Q3 How many youth under the age of 18 are living in your home?

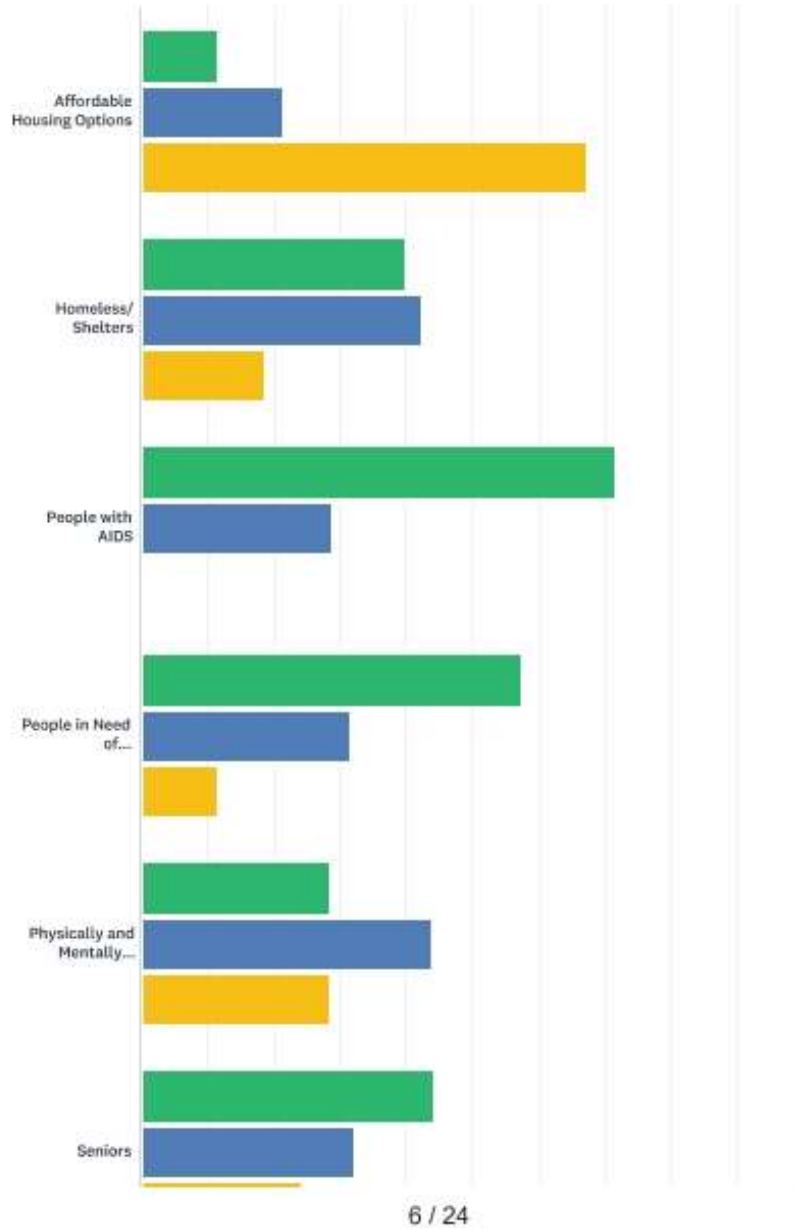
Answered: 112 Skipped: 2

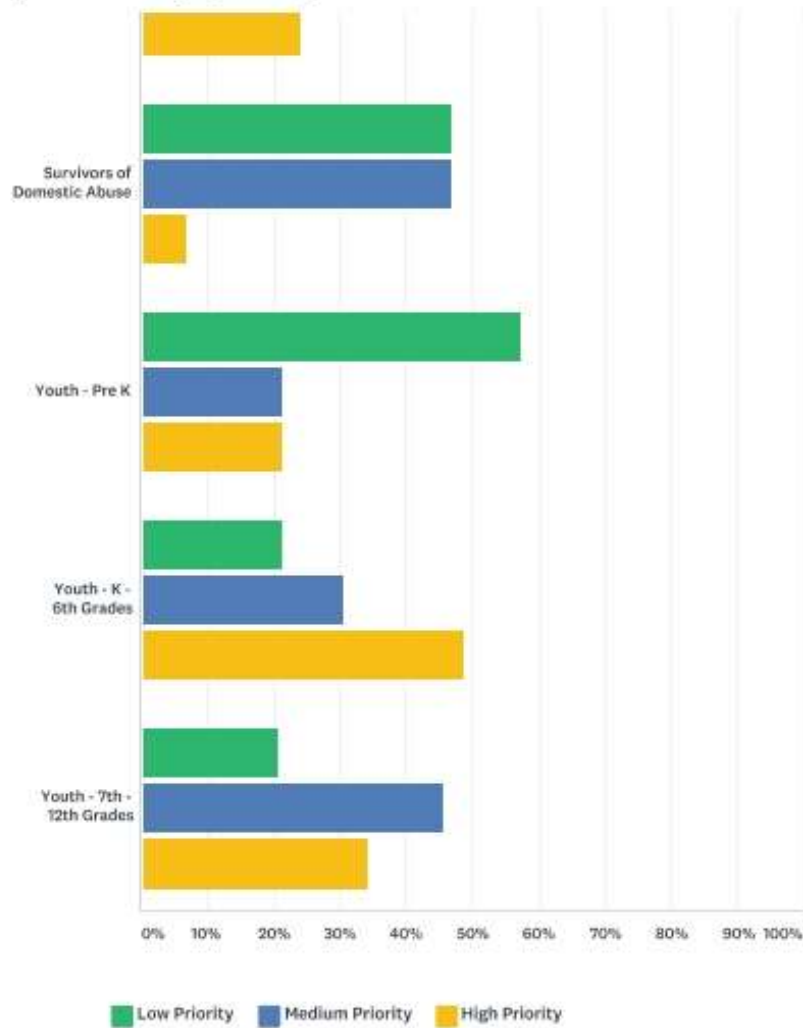


ANSWER CHOICES	RESPONSES	
1-2	32.14%	36
3-5	9.82%	11
6-8	0.00%	0
9 or more	0.00%	0
None	58.04%	65
TOTAL		112

Q4 Review the list of Community needs, and select one as a High Priority, one as a Medium Priority, and one as a Low Priority. There should only be one High priority, one medium priority, and one low priority.

Answered: 112 Skipped: 2





	LOW PRIORITY	MEDIUM PRIORITY	HIGH PRIORITY	TOTAL
Affordable Housing Options	11.43% 8	21.43% 15	67.14% 47	70
Homeless/ Shelters	39.47% 15	42.11% 16	18.42% 7	38
People with AIDS	71.43% 10	28.57% 4	0.00% 0	14
People in Need of Transportation	57.14% 20	31.43% 11	11.43% 4	35
Physically and Mentally Handicapped Assistance	28.21% 11	43.59% 17	28.21% 11	39
Seniors	44.00% 11	32.00% 8	24.00% 6	25

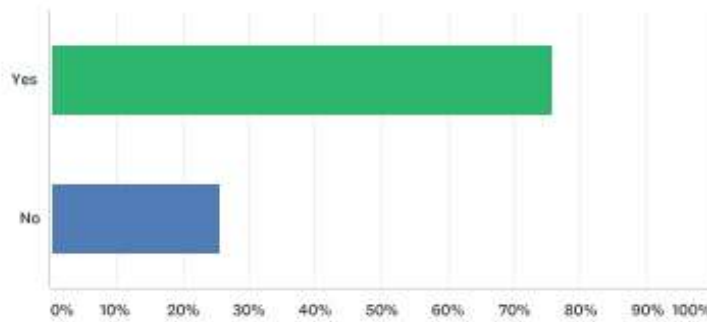
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Survivors of Domestic Abuse	46.67% 7	46.67% 7	6.67% 1	15
Youth - Pre K	57.14% 8	21.43% 3	21.43% 3	14
Youth - K - 6th Grades	21.21% 7	30.30% 10	48.48% 16	33
Youth - 7th - 12th Grades	20.45% 9	45.45% 20	34.09% 15	44

Q5 The City of Davenport has the option to focus funds to a specific area of the City based on the income of residents. Would you support this strategy?

Answered: 110 Skipped: 4



ANSWER CHOICES	RESPONSES	
Yes	75.45%	83
No	25.45%	28
Total Respondents: 110		

#	COMMENTS:	DATE
1	But, as one of multiple factors	9/26/2018 3:37 PM
2	Public should be invited to say where the specific area should be	9/26/2018 1:04 PM
3	Project Renewal	9/26/2018 11:43 AM
4	Yes because the funds need to be given in places where children can grow to know they always have some where to go and to strive for and continue their education, and somewhere they can say hey that program made me who i am today. I went there and my children now do. Project renewal.	9/26/2018 11:22 AM
5	Genius idea! Low-income residents need more help.	9/24/2018 3:33 PM
6	A lot of the list is high priority	9/24/2018 1:40 PM
7	Opportunity Zones	9/18/2018 10:52 AM
8	About damn time!	9/14/2018 12:40 PM
9	I don't think it should focus on any specific area. There are many areas that need funds.	9/14/2018 9:51 AM
10	unsure	9/13/2018 8:05 PM
11	Depends on what that means. This doesn't provide any real information.	9/13/2018 3:12 PM
12	The rise in community violence is a huge issue and needs to be addressed with targeted and planful resources to communities in need.	9/13/2018 9:05 AM
13	I would say yes if the lower the income received more of the help	9/12/2018 6:36 PM
14	Anything to address the kids stealing cars!	9/12/2018 2:15 PM
15	Richer people will have more funds for projects and poor people will have less funds. Take care of what needs to be fixed no matter the location. That's why you pool the money together in the first place.	9/12/2018 1:47 PM

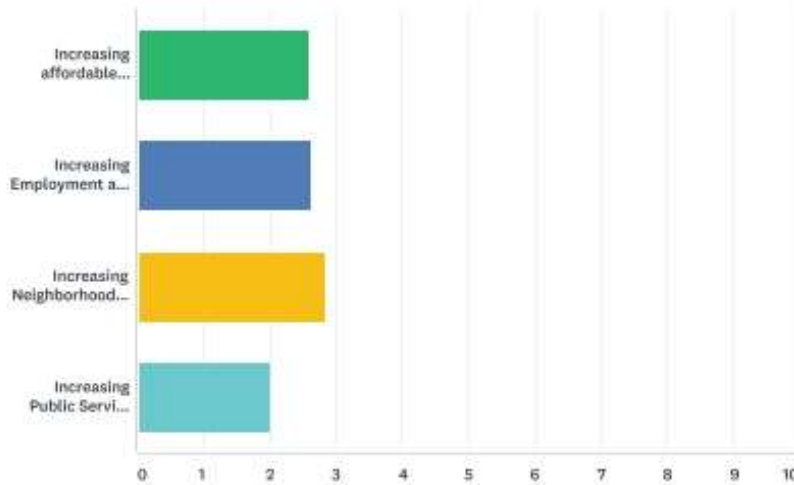
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16	NIMBY. But why not focus on the 7th thru 15th st / Mound to Gaines. Could us ethe \$ input.	9/12/2018 1:29 PM
17	These things are needed all around our community not just one area.	9/12/2018 11:09 AM
18	public transportation and SAFE, affordable housing need to be priorities.	9/11/2018 11:47 AM
19	Not sure I understand.	9/10/2018 9:12 AM
20	if it is based on being employed, but still low-income	9/1/2018 11:36 AM
21	I propose the development of The Village of Rockinham.	8/31/2018 2:49 PM
22	The City looks like the slums Starting North, West and South	8/31/2018 6:24 AM
23	Depends on the income you are referring to. I would more likely support bringing up lower income areas with the help of the residents	8/30/2018 1:55 PM
24	Improving housing options and infrastructure in central Davenport would increase property tax revenue and encourage young families to live in our community.	8/30/2018 1:19 PM

Q6 Rank 1-4 the best way to improve low income neighborhoods, with 1 being the best

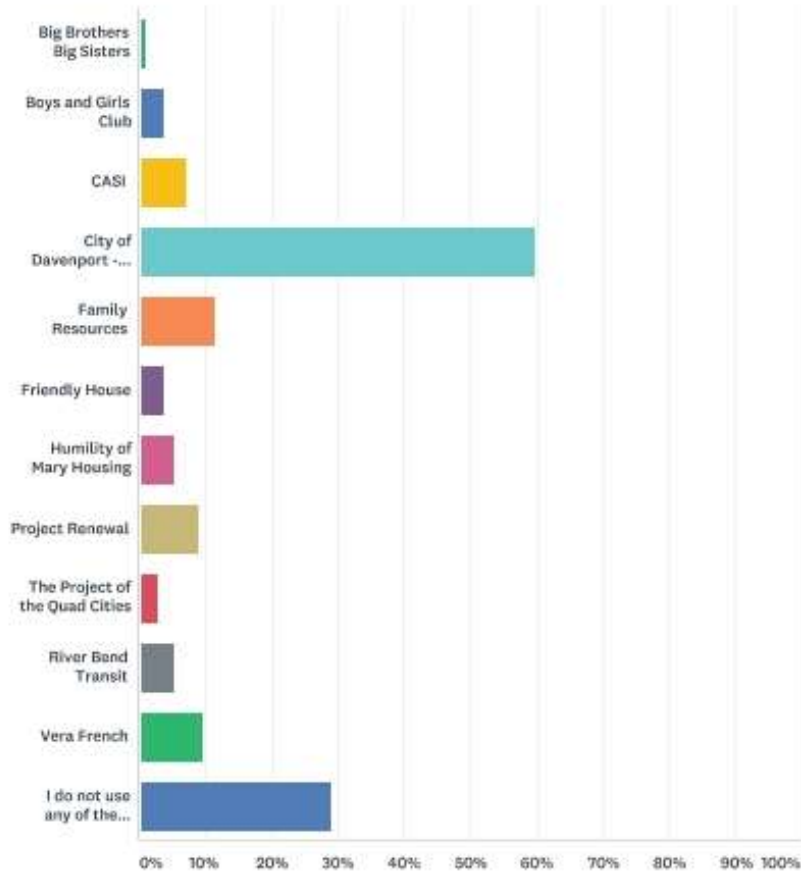
Answered: 111 Skipped: 3



	1	2	3	4	TOTAL	SCORE
Increasing affordable Housing	28.18% 31	19.09% 21	35.45% 39	17.27% 19	110	2.58
Increasing Employment and Business Oppourtunities	24.30% 28	34.58% 37	18.89% 20	22.43% 24	107	2.61
Increasing Neighborhood Quality and Safety	40.19% 43	22.43% 24	17.76% 19	19.63% 21	107	2.63
Increasing Public Services to Low-Moderate Income Residents	8.33% 9	23.15% 25	28.70% 31	39.81% 43	108	2.00

Q7 Please check all of the services that you currently use:

Answered: 114 Skipped: 0



ANSWER CHOICES	RESPONSES
Big Brothers Big Sisters	0.88% 1
Boys and Girls Club	3.51% 4
CASI	7.02% 8
City of Davenport - Parks & Recreation	59.65% 68
Family Resources	11.40% 13
Friendly House	3.51% 4
Humilty of Mary Housing	5.26% 6
Project Renewal	8.77% 10

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The Project of the Quad Cities	2.63%	3
River Bend Transit	5.26%	6
Vera French	9.65%	11
I do not use any of the listed services	28.95%	33
Total Respondents: 114		

#	OTHER (PLEASE SPECIFY):	DATE
1	Library	9/27/2018 10:40 AM
2	Davenport Public Library	9/26/2018 1:04 PM
3	Food pantries	9/24/2018 1:40 PM
4	The Davenport Public Library	9/24/2018 12:51 PM
5	The Davenport Public Library	9/24/2018 12:49 PM
6	The Davenport Public Library	9/24/2018 12:48 PM
7	I support a lot of these services even though I may not use them. I work with a lot of families that would struggle without the assistance of these programs.	9/13/2018 8:05 PM
8	My clients use Vera French and Humility of Mary and Riverbend	9/11/2018 12:50 PM
9	library	9/1/2018 11:36 AM
10	Would love to own but can not afford too	8/31/2018 6:24 AM

Q8 Are there additional services you would like to have provided that are not listed in Question 7?

Answered: 68 Skipped: 46

#	RESPONSES	DATE
1	Affordable child care facilities with after-hours	9/27/2018 8:53 AM
2	Are there any financial incentives or grants available for areas that need gentrification such as the 52803/02/01 ZIP Codes? More funding needs to be put into these areas because the city has neglected it for far too long.	9/27/2018 7:12 AM
3	no	9/26/2018 4:14 PM
4	Free transportation for senior citizens	9/26/2018 1:04 PM
5	N/A	9/26/2018 11:43 AM
6	No, but i hope you can make the right decision and continue these childrens education so they can get out of the hood and low income and show them that there is more to life then just low income. There is a need for change and these millenials need that.	9/26/2018 11:22 AM
7	No	9/26/2018 10:26 AM
8	Free rides for the poor	9/25/2018 10:18 PM
9	No	9/24/2018 8:14 PM
10	Free transportation	9/24/2018 1:40 PM
11	Community Action of Eastern Iowa - Low Income Home Energy Assistance Program (LIHEAP)	9/24/2018 12:51 PM
12	Community Action of Eastern Iowa - Low Income Home Energy Assistance Program (LIHEAP)	9/24/2018 12:49 PM
13	Community Action of Eastern Iowa - Low Income Home Energy Assistance Program (LIHEAP)	9/24/2018 12:48 PM
14	N/A	9/18/2018 10:52 AM
15	more info on seniors	9/17/2018 1:01 PM
16	Make services more known to low income who dont have or know how to use computers.	9/16/2018 12:06 PM
17	No	9/14/2018 9:48 PM
18	Micro loans and grants for persons experiencing emergencies like car repair or medical bills so they can keep roofs over their head and keep their jobs; City-funded Dollarwise program. Fund Trauma-Informed Care training for City staff and social service agencies.	9/14/2018 12:40 PM
19	There is a need for more mental health providers in this area.	9/13/2018 8:05 PM
20	Better public transit, postpartum/postadoption support	9/13/2018 3:12 PM
21	no	9/13/2018 12:18 PM
22	n/a	9/13/2018 9:20 AM
23	no	9/13/2018 9:05 AM
24	Safety	9/13/2018 7:52 AM
25	No	9/12/2018 4:14 PM
26	No	9/12/2018 3:36 PM
27	No	9/12/2018 3:35 PM
28	No	9/12/2018 2:32 PM
29	No	9/12/2018 2:31 PM
30	Anything to address the crime/car theft with juveniles!	9/12/2018 2:15 PM

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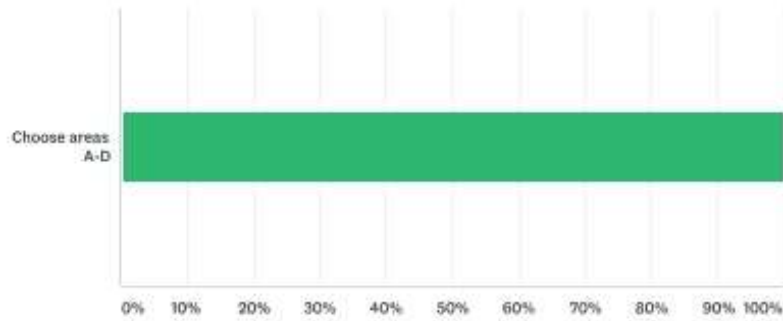
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31	The youth need a program designed to teach them good decision making skills. The program should also incorporate violence prevention and mental health components. This should be mandatory for all youth that violate the law, yet also offered to all youth in the area. It should not be dependent on income level or race.	9/12/2018 1:53 PM
32	More opportunities/ways for single parents to get before and after school help for kids... Specifically transportation to school from day care sites. It does this much better!	9/12/2018 1:47 PM
33	n0	9/12/2018 12:22 PM
34	More programs for youth and the community at large	9/12/2018 12:21 PM
35	To make the city more pedestrian or bicycle friendly.	9/12/2018 12:03 PM
36	To make the city more pedestrian or bicycle friendly.	9/12/2018 12:03 PM
37	Road Repairs!	9/12/2018 11:52 AM
38	No	9/12/2018 11:46 AM
39	Early Childhood Activities	9/12/2018 11:34 AM
40	Support for refugee families - Tapestry Farms is an organization that is just getting up and going. www.tapestryfarms.org	9/12/2018 11:07 AM
41	Other mental health facilities such as LSI, Psych Associates, etc... Mental health and programing for teenagers struggling with mental health is a huge need in our community.	9/12/2018 11:02 AM
42	None	9/11/2018 4:33 PM
43	no	9/11/2018 1:03 PM
44	No	9/11/2018 12:50 PM
45	Do not know enough	9/11/2018 10:30 AM
46	a Navigator to assist people who need help guiding them through the many social services available.	9/11/2018 9:04 AM
47	Programs that target minorilies seniors so they know what are available to them	9/9/2018 11:19 AM
48	No	9/8/2018 12:58 PM
49	No	9/8/2018 12:58 PM
50	Clean needle exchanges	9/5/2018 8:18 AM
51	unknown	9/4/2018 10:11 AM
52	Bring back the mobile veggie truck!	9/4/2018 8:03 AM
53	No	9/1/2018 6:49 PM
54	better transportation! not just 1/hour, and post bus routes & schedules at all stops.	9/1/2018 11:36 AM
55	free parking	9/1/2018 9:50 AM
56	No	8/31/2018 4:09 PM
57	Always a good thing to increase public transportation.	8/31/2018 2:49 PM
58	Public access wifi	8/31/2018 11:38 AM
59	no	8/31/2018 9:21 AM
60	Church groups, food pantries, Employment services	8/31/2018 8:50 AM
61	No	8/31/2018 7:39 AM
62	Home improvements there are soooo many houses that need painting or repairs to make the City look more livable to people passing thraw	8/31/2018 6:24 AM
63	I do not know	8/30/2018 5:37 PM
64	no	8/30/2018 2:04 PM
65	No	8/30/2018 1:55 PM
66	No	8/30/2018 1:46 PM

67	no	8/30/2018 1:25 PM
68	no	8/30/2018 1:19 PM

Q9 Please Review Map you will use it to answer Questions 10-13
 Area A - North of W. Kimberly Road, West of Brady Street
 Area B - North of W. Kimberly Road, East of Brady Street
 Area C - South of W. Kimberly Road, East of Brady Street
 Area D - South of W. Kimberly Road, West of Brady Street

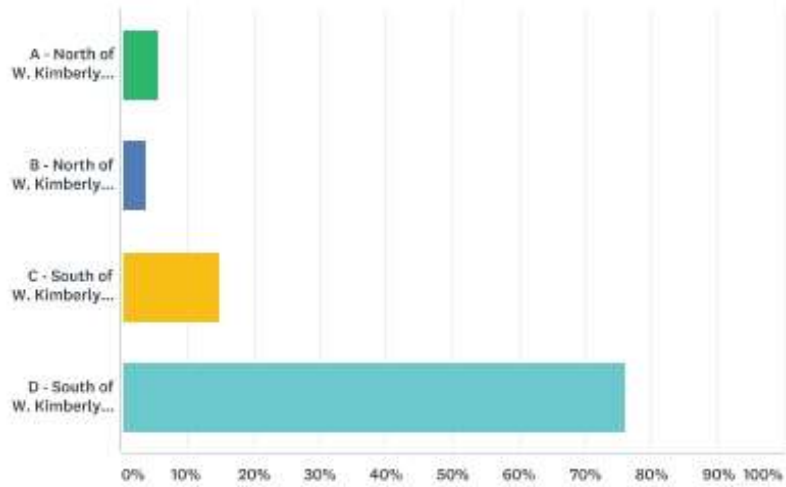
Answered: 36 Skipped: 78



ANSWER CHOICES	RESPONSES
Choose areas A-D	100.00% 36
Total Respondents: 36	

Q10 Which area has the highest need for housing improvements? (Use map in Question #9)

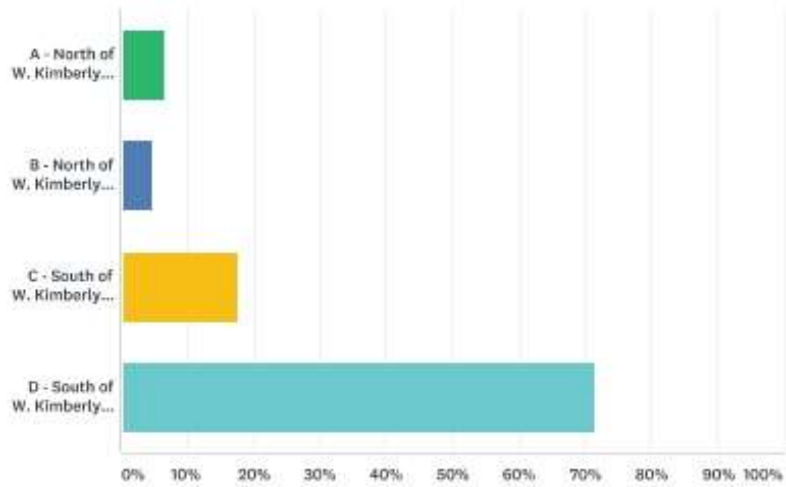
Answered: 108 Skipped: 6



ANSWER CHOICES	RESPONSES
A - North of W. Kimberly Road, West of Brady Street	5.56% 6
B - North of W. Kimberly Road, East of Brady Street	3.70% 4
C - South of W. Kimberly Road, East of Brady Street	14.81% 16
D - South of W. Kimberly Road, West of Brady Street	75.93% 82
TOTAL	108

Q11 Which area has the highest need for employment and business improvements? (Use map in Question #9)

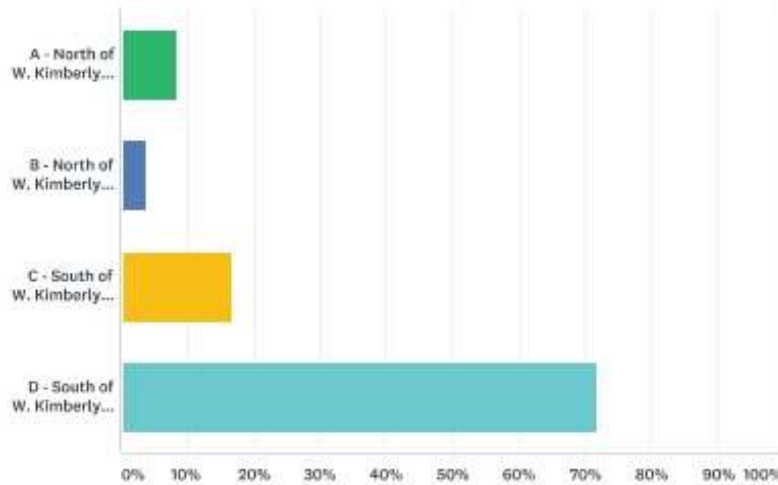
Answered: 108 Skipped: 6



ANSWER CHOICES	RESPONSES
A - North of W. Kimberly Road, West of Brady Street	6.48% 7
B - North of W. Kimberly Road, East of Brady Street	4.63% 5
C - South of W. Kimberly Road, East of Brady Street	17.59% 19
D - South of W. Kimberly Road, West of Brady Street	71.30% 77
TOTAL	108

Q12 Which area has the highest need for neighborhood quality and safety improvements? (Use map in Question #9)

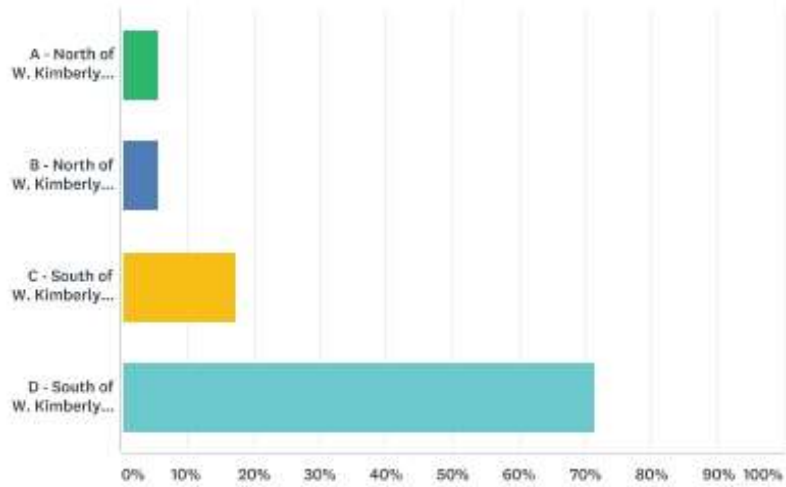
Answered: 109 Skipped: 5



ANSWER CHOICES	RESPONSES
A - North of W. Kimberly Road, West of Brady Street	8.26% 9
B - North of W. Kimberly Road, East of Brady Street	3.67% 4
C - South of W. Kimberly Road, East of Brady Street	16.51% 18
D - South of W. Kimberly Road, West of Brady Street	71.56% 78
TOTAL	109

Q13 Which area has the highest need for an increase in public services for low-moderate income residents? (Use map in Question #9)

Answered: 105 Skipped: 9



ANSWER CHOICES	RESPONSES
A - North of W. Kimberly Road, West of Brady Street	5.71% 6
B - North of W. Kimberly Road, East of Brady Street	5.71% 6
C - South of W. Kimberly Road, East of Brady Street	17.14% 18
D - South of W. Kimberly Road, West of Brady Street	71.43% 75
TOTAL	105

Q14 Any additional comments or suggestions?

Answered: 47 Skipped: 67

#	RESPONSES	DATE
1	There is a significant need for lead-based paint remediation for many of the homes south of Locust St. in Davenport. In addition many of these homes require general maintenance and renovations to make them safe.	9/27/2018 8:53 AM
2	The neighborhood south of locusts have been subject to stigma created by the city pushing commerce out for decades. The stigma needs to be eradicated. There are so many homes that can be saved yet we have a homeless population and a serious slumlord situation going on as well. The ones that cannot be saved sit falling in on themselves. These homes do not get torn down in a timely manner. The city needs to speed up the process and they also need to start building these cheap Habitat for Humanity homes on the lights. In 20 years those will be junk too, thus starting the process over. Then you support organizations like neighborhood housing who do nothing with their properties and won't allow agents to help them sell them. I sit across the street from one of their properties that they received for no cost and they're using it as a storage building. Meanwhile it's D valuing my home and my neighbors homes by not being rehabbed. That organization needs to be shut down or all of the staff needs to be removed and rehired with competent people who are not selfishly holding properties for their own needs and profit.	9/27/2018 7:12 AM
3	none	9/26/2018 4:14 PM
4	N/A	9/26/2018 11:43 AM
5	Please keep these children's future in mind when making these important decisions.	9/26/2018 11:22 AM
6	No	9/26/2018 10:26 AM
7	No	9/24/2018 8:14 PM
8	Take care of the mentally ill people	9/24/2018 1:40 PM
9	These are all HIGH Priority and Education should be lumped together as K-12 Education. Affordable Housing Options Affordable Housing Options Low Priority Affordable Housing Options Medium Priority Affordable Housing Options High Priority Homeless/ Shelters Homeless/ Shelters Low Priority Homeless/ Shelters Medium Priority Homeless/ Shelters High Priority People with AIDS People with AIDS Low Priority People with AIDS Medium Priority People with AIDS High Priority People in Need of Transportation People in Need of Transportation Low Priority People in Need of Transportation Medium Priority People in Need of Transportation High Priority Physically and Mentally Handicapped Assistance Physically and Mentally Handicapped Assistance Low Priority Physically and Mentally Handicapped Assistance Medium Priority Physically and Mentally Handicapped Assistance High Priority Seniors Seniors Low Priority Seniors Medium Priority Seniors High Priority Survivors of Domestic Abuse Survivors of Domestic Abuse Low Priority Survivors of Domestic Abuse Medium Priority Survivors of Domestic Abuse High Priority Youth - Pre K Youth - Pre K Low Priority Youth - Pre K Medium Priority Youth - Pre K High Priority Youth - K - 6th Grades Youth - K - 6th Grades Low Priority Youth - K - 6th Grades Medium Priority Youth - K - 6th Grades High Priority Youth - 7th - 12th Grades	9/24/2018 12:51 PM
10	Question 3. suggest that items are low, medium, or high priority - Which is NOT a good way to MEASURE, present, and assess: evaluate or estimate the nature, ability, or quality of....when in fact all the major social, economic and cultural aspects of each element are extremely IMPORTANT....not just three. These questions need to be vetted and redone in a scale that is valid and measurable because as it is presented....it is NOT a valid measurement of the questions presented.	9/24/2018 12:49 PM
11	Question 3. suggest that items are low, medium, or high priority - Which is NOT a good way to MEASURE, present, and access: evaluate or estimate the nature, ability, or quality of....when in fact all the major social, economic and cultural aspects of each element are extremely IMPORTANT....not just three. These questions need to be vetted and redone in a scale that is valid and measurable because as it is presented....it is NOT a valid measurement of the questions presented.	9/24/2018 12:48 PM
12	Tiny Home Communities through Community Land TRUSTS	9/18/2018 10:52 AM

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13	no	9/17/2018 1:01 PM
14	Below locust is most of low income people	9/16/2018 12:06 PM
15	The city needs to be assertive in solving issues such as segregation, neighborhood trauma, transportation improvements, and balancing out commercial and employment opportunities so they are not congregated in particular areas, like 53rd and Elmore.	9/14/2018 12:40 PM
16	N/A	9/13/2018 8:05 PM
17	The city council members who exposed themselves as overtly racist with their attempts to illegally dismantle the civil rights commission should have no role in this endeavor.	9/13/2018 3:12 PM
18	No	9/13/2018 12:18 PM
19	n/a	9/13/2018 9:20 AM
20	The area south of Kimberly Road and East of Brady to Mound Street also.	9/12/2018 6:36 PM
21	No	9/12/2018 4:14 PM
22	No	9/12/2018 3:36 PM
23	No	9/12/2018 3:35 PM
24	No	9/12/2018 2:32 PM
25	Please spend our money on things that will help decrease the high risk youth behaviors. We also need to increase our pride in the community. I'm not sure how to do this but I find it odd that Davenport is a hub of activity, yet young families do not want to live here. It should not be a stepping stone city to other cities (Bettendorf/PV).	9/12/2018 1:53 PM
26	Limited bus routes in the A quadrant.	9/12/2018 1:47 PM
27	It is unfortunate that the only low income housing is in sketchy, dangerous neighborhoods. This makes it very hard for low income families to feel safe in their neighborhoods.	9/12/2018 12:22 PM
28	It's hard to answer with one neighborhood or - for Number 4 - high priority community need. Our low-income neighbors are suffering terribly. This must be our top priority, if we are to create the "cool and creative" community the Chamber keeps talking about.	9/12/2018 12:21 PM
29	While we appreciate your efforts to improve the city, the fact of the matter is, as a homeowner, it costs a premium to live here. Literally, we pay more taxes than comparable (or even more valuable) homes in Bettendorf. We understand that the needs are significant for lower income families in Davenport, but for what it costs to live here and what we get (mediocre schools, failing infrastructure and significantly increased crime...just to list a few), it really doesn't make sense for us to stay here long-term. Families are leaving Davenport to live in safer communities with better schools, lower taxes and less bureaucracy. It is for these reasons that we also intend to move at the next opportunity.	9/12/2018 11:44 AM
30	Thank you for studying this!	9/12/2018 11:07 AM
31	low-moderate income can be built anywhere. They don't have to exist only in the parts of the community that are already low-moderate income. Diversity across the city is a good thing. My kids benefit from having kids that go to their school that don't look like them.	9/12/2018 11:02 AM
32	no	9/11/2018 1:03 PM
33	No	9/11/2018 12:50 PM
34	Where can we learn more about Community Development Block Grant? And how do we participate in it to improve our neighborhood?	9/9/2018 11:19 AM
35	None	9/8/2018 12:58 PM
36	None	9/8/2018 12:58 PM
37	Your zoning plans unfairly target people that work with people that are dealing with mental health issues, like substance abuse.	9/5/2018 8:18 AM
38	unknown	9/4/2018 10:11 AM
39	No	9/1/2018 6:49 PM
40	increase the number of police officers	9/1/2018 5:36 PM

City of Davenport - Community Input Survey 2018

SurveyMonkey

41	cant even see map-why isn't it larger? have no idea how to answer the questions!!	9/1/2018 11:36 AM
42	Create an assistance program for South Of Locust (SOLO) homeowners to improve their properties. There used to be one in the early 1990s.	9/1/2018 7:07 AM
43	Without a doubt commercial development to meet the needs of communities west of Brady. I suggest the West Locust Stree and Rockingham Road corridor. Lots of growth off Locust West of the high school and lots of affordable housing off Rockinham West of Fairmont.	8/31/2018 2:49 PM
44	City should consider zoning for tiny experimental housing off the grid. City planners should consider new techniques and building codes to provide excellent low-cost housing that has a small environmental footprint.	8/31/2018 11:38 AM
45	No	8/31/2018 7:39 AM
46	The Southside is the worst with water problems alot of homes up for sale there.	8/31/2018 6:24 AM
47	Maintain the infrastructure you have; don't be so eager to contribute to suburban sprawl - that requires more police, more fire, more public works, etc.	8/30/2018 1:19 PM

HUD Guidance

HUD Guidance



OFFICE OF COMMUNITY PLANNING
AND DEVELOPMENT

U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT
WASHINGTON, DC 20410-7000

Special Attention of:
All CPD Division Directors
HUD Field Offices
HUD Regional Offices
All CDBG Grantees
All HOME Participating Jurisdictions
All HTF Grantees
All ESG -Grantees
All HOPWA - Grantees

NOTICE: CPD-19-01

Issued: February 13, 2019
Expires: September 30, 2019

Cross Reference: 24 CFR Part 91

Subject: Guidance on Submitting Consolidated Plans and Annual Action Plans
for Fiscal Year (FY) 2019

Purpose:

The purpose of this Notice is to instruct all Community Development Block Grant (CDBG), HOME Investment Partnerships (HOME), Housing Trust Fund (HTF), Emergency Solutions Grants (ESG) and Housing Opportunities for Persons With AIDS (HOPWA) grantees on the timing of submission of FY 2019 Consolidated Plans and Action Plans. Grantees should not submit their Plans until after Congress passes HUD's FY 2019 appropriations, and the actual grant amounts have been determined. This Notice provides instructions to grantees/participating jurisdictions under each of these programs regarding costs incurred prior to execution of a grant agreement. This Notice further informs Entitlement CDBG grantees and HOME participating jurisdictions of waivers being made available to certain grantees/participating jurisdictions to assist in the implementation of the pre-award costs instructions. These procedures apply equally to grantees' 3- to 5-year Consolidated Plans as well as to annual Action Plans (either as a stand-alone document or as a component of the overall Consolidated Plan submission).

Notes regarding applicability:

This Notice uses the term "grantee" generically, to also include HOME participating jurisdictions, except where the term appears in discussions explicitly limited to one of the other covered funding programs. Provisions of this Notice covering the Entitlement CDBG program also apply to Insular Areas grantees and CDBG nonentitlement county grantees in Hawaii, as the Entitlement CDBG program regulations also apply to their CDBG funds.

Background:

Pursuant to 24 CFR 91.15(a)(1), each jurisdiction should submit its Consolidated Plan to HUD at least 45 days before the start of its program year. The earliest date on which HUD will accept a Consolidated Plan or Action Plan submission is November 15, 2018; and the latest

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submission deadline is August 16, 2019. However, in most years, HUD does not receive its annual funding appropriation until several months into the federal fiscal year (rarely earlier than December, and sometimes as late as April). Once a fiscal year's appropriation is enacted, HUD needs time to compute grantees' allocation amounts for the programs covered by the Consolidated Plan.

According to 24 CFR 91.500(a), a Plan will be deemed approved 45 days after HUD receives the Plan, unless HUD notifies the jurisdiction before that date that the Plan is disapproved. In past years, HUD typically did not disapprove a Plan solely because it was based on estimated allocation amounts. As a result, a Plan submitted by a grantee before its allocation amounts are announced typically received automatic approval, even though the Plan did not list the grantee's actual allocation amounts.

This practice resulted in significant additional work for both HUD and grantees. After the actual allocation amounts were announced, a grantee had to submit a revised, re-signed SF-424 form listing the actual allocation amounts for each of its grants. In many cases, the grantee had to make additional changes to amend its Plan to reflect its actual allocation amounts. This may have constituted a substantial amendment under 24 CFR 91.505, which is subject to the grantee's citizen participation plan process. For FY 2019, HUD will not execute a grant agreement with a grantee until HUD has received a Plan (or an amended Plan) which incorporates the actual allocation amounts a grantee is to receive for FY 2019.

Revised Procedures for Submission of FY 2019 Consolidated Plans and Action Plans by Grantees with Early Program Year Start Dates:

HUD is issuing the following revised procedures to govern the submission and review of Consolidated Plans and Action Plans for FY 2019 funding prior to computation of FY 2019 allocation amounts. These procedures will apply to any grantee whose normal Consolidated Plan/Action Plan submission deadline (45 days before the start of the program year) falls either before, or less than 60 days after, the date HUD announces FY 2019 allocation amounts for CDBG, ESG, HOME and HOPWA funding. (See Section II, for a discussion of the timing of Housing Trust Fund allocations.)

Congress has not completed the appropriations process for HUD's FY2019 appropriation. At this time, HUD cannot predict when its FY 2019 appropriations bill will be enacted and when it will be able to announce FY 2019 allocation amounts. Thus, HUD cannot say how many grantees – or which program year start dates – will be subject to these revised procedures. Similarly, HUD cannot provide estimated FY 2019 allocation amounts for grantees to use for planning purposes in developing annual Action Plans.

Note: These procedures will not apply to grantees whose normal Consolidated Plan/Action Plan submission deadline is more than 60 days after HUD announcement of FY 2019 allocation amounts; those grantees should have sufficient time to revise their Plans to match actual allocation amounts prior to the due date for their Plan.

I. Revised Submission Dates for FY 2019 Consolidated Plans/Action Plans for CDBG, ESG, HOME, HOPWA

Grantees are advised not to submit their Consolidated Plan/Action Plan until after the FY 2019 allocations have been announced. Grantees due to submit a new 3- to 5-year Consolidated Plan in FY 2019 should refrain from submitting the overall Consolidated Plan as well as the FY 2019 Action Plan contained within the overall document. HUD cannot complete its review of the overall Consolidated Plan components independent of the current year's Action Plan component. Once HUD informs grantees of their FY 2019 funding allocation amounts, each grantee should, prior to submission, ensure that the actual FY 2019 allocation amounts are reflected in the form SF-424, in the description of resources and objectives, and in the description of activities to be undertaken (or, for states, the method of distribution). It may be necessary for a grantee to revise its Action Plan before submission to HUD.

An affected grantee may delay submission of its Consolidated Plan or Action Plan to HUD until 60 days after the date allocations are announced, or until August 16, 2019 (whichever comes first). This delay will give a grantee time to revise its Action Plan to incorporate actual allocation amounts, and to conduct any additional citizen participation, if necessary.

For example, if HUD were to announce the FY 2019 allocation amounts to grantees on April 26, 2019:

- For grantees with January 1 – June 1 program year start dates, their normal plan submission date would have been before the date that HUD announced allocation amounts. These grantees would be able to postpone submission of their Consolidated Plan/Action Plan until June 25, 2019.
- For grantees with July 1 and August 1 program year start dates, their normal Plan submission date would be less than 60 days after HUD's announcement of allocation amounts. These grantees would also be able to postpone submission of their Consolidated Plan/Action Plan until June 25, 2019.
- Grantees with September 1 and October 1 program year start dates would have more than 60 days between the date of announcement of allocations and the normal submission deadline for their Consolidated Plan/Action Plan. These grantees would be expected to submit their Plan on time.

However, in no case may a Consolidated Plan/Action Plan be submitted to HUD later than August 16, 2019. Failure to submit an Action Plan for FY 2019 by August 16, 2019, will result in the automatic loss of FY 2019 CDBG funds to the grantee. This requirement is established by statute, and HUD cannot waive the August 16 submission deadline. Funding under other CPD formula programs are not subject to this deadline but, since virtually all CPD formula grantees receive CDBG funding, the CDBG submission requirement effectively establishes the deadline for submission of Action Plans.

The regulations, at 24 CFR 91.15(a)(1), state that "...each jurisdiction should submit its Consolidated Plan at least 45 days before the start of its program year." HUD has determined that it is not necessary to waive this provision in order to implement the procedures in this Notice for FY 2019 Action Plans. This provision does not prohibit a grantee from submitting a Plan in the eCon Planning Suite after that time. It is not necessary for an affected grantee to request an exception to its normal Action Plan submission date under 24 CFR 91.15(a)(1), nor is it necessary for a field office to grant an exception to the Action Plan submission deadlines, under 24 CFR 91.20, in order to implement the procedures in this Notice.

II. Submission Process for the Housing Trust Fund (HTF) Program

HTF is an affordable housing production program to increase and preserve the supply of decent, safe, and sanitary affordable housing for extremely low-income and very low-income families. See 24 CFR part 93. HTF is a formula grant program for states.

The HTF regulation at 24 CFR 93.100 requires each state to include its HTF allocation plan in its annual Action Plan as described at 24 CFR 91.320(k)(5). The HTF allocation plan describes the method for the distribution of funds, and establishes the application requirements and criteria for selecting applications. The rule also requires a local jurisdiction that receives a subgrant of HTF funds from the state to include a HTF allocation plan (24 CFR 91.220(l)(5)) in its annual Action Plan, but due to the timing of the publication of HTF allocations, the local jurisdiction may need to amend its annual Action Plan to include HTF.

The timing of the HTF allocations is different from other CPD formula programs (CDBG, HOME, HOPWA, and ESG) because the source of funding is the mandatory assessments on Fannie Mae and Freddie Mac rather than Federal appropriations. The earliest HUD expects to publish the HTF allocations is April 2019. If HTF allocations are not published before a state submits its Consolidated Plan/Action Plan, a state may submit its Consolidated Plan/Action Plan for the other CPD formula programs, then submit its HTF allocation plan as a substantial amendment to its annual Action Plan, after the HTF allocations are published.

III. HUD Review of Action Plans

HUD will review a Consolidated Plan/Action Plan in accordance with 24 CFR 91.500(b). The 45-day review period will begin whenever the eCon Planning Suite submission or original executed SF-424, certifications and applicable assurances (SF 424B and SF 424D, as applicable) are received by the field office, whichever is later. HUD will disapprove as substantially incomplete any Consolidated Plan or Action Plan covering FY 2019 funding that does not reflect actual CDBG, HOME, ESG and HOPWA allocation amounts on the form SF-424(s), in the description of resources and objectives, and in the description of activities to be undertaken (or, for states, the method of distribution). The HTF allocation must be included if the HTF allocations are published before the state submits its Consolidated Plan or Action Plan. (See Section II.) A grantee whose Action Plan is disapproved for this reason is advised to not resubmit a revised Plan until HUD has announced the actual FY 2019 allocation amounts, and until the grantee has incorporated the actual allocation amounts into its Plan.

24 CFR 91.500(b) states HUD may disapprove a Plan or a portion of a Plan if it is inconsistent with the purpose of the Cranston-Gonzalez National Affordable Housing Act (42 U.S.C. 12703), if it is substantially incomplete, or, in the case of a CDBG certification under §91.225(a) and (b) or §91.325(a) and (b), if it is not satisfactory to the Secretary in accordance with §570.304, §570.429(g), or §570.485(c). The following are examples provided in §91.500(b) of substantially incomplete Plans:

- (1) A Plan developed without the required citizen participation or the required consultation;
- (2) A Plan that fails to satisfy all the required elements in 24 CFR Part 91, as reflected in the eCon Planning Suite. This includes when the grantee has not provided a final statement of community development objectives and the projected use of funds;
- (3) A Plan for which a certification is rejected by HUD as inaccurate, after HUD has inspected the evidence and provided due notice and opportunity for comment; and
- (4) A Plan without a description of the manner in which the unit of general local government or state will provide financial or other assistance to a public housing agency if the public housing agency is designated by HUD as "troubled".

24 CFR 91.500(d) states that "(t)he jurisdiction may revise or resubmit a Plan within 45 days after the first notification of disapproval." HUD has determined that it is not necessary to waive this provision in order to implement the procedures in this Notice for FY 2019 Consolidated Plans/Action Plans. This provision does not prohibit a grantee from re-submitting a Plan after that time period.

24 CFR 91.105(c), 91.115(c) and 91.505 require a grantee to comply with citizen participation requirements when it undertakes a substantial amendment to an approved Plan. A Plan that has been disapproved by HUD is, by definition, not an approved Plan. When a grantee's Plan is disapproved by HUD, the Consolidated Plan regulations do not necessarily require a grantee to undertake further citizen participation on the changes the grantee makes before re-submitting it. (A major exception to this, however, would be if the reason for disapproval involved the grantee's failure to fulfill citizen participation requirements to begin with.) However, as noted in this Notice, there are circumstances in which a grantee may need to make major revisions to a disapproved Plan, which could trigger further citizen participation efforts. A grantee with a disapproved Plan should review its citizen participation plan and local policies to determine whether it will need to conduct further citizen participation as a result of the changes it makes to incorporate actual allocation amounts into its Plan, prior to re-submission of the revised Plan.

IV. Development of Proposed Action Plans and Citizen Participation During the Interim

A grantee has several options regarding fulfilling its citizen participation obligations while waiting for HUD to announce FY 2019 allocation amounts:

- a. A grantee may conduct citizen participation on its draft Plan (with estimated funding amounts) according to its normal timetable and citizen participation procedures. (Grantees

are cautioned, though, that they should not submit their Plan until allocation amounts are known.) A grantee doing so should make clear that the funding levels shown are estimated amounts. In addition, the grantee should include "contingency provision" language in its Action Plan which explains how it will adjust its proposed Plan to match its actual allocation amounts, once actual amounts become known. By including such contingency language, a grantee can avoid the need to make significant revisions to its Plan (beyond incorporating the final allocation amounts into the Plan and the SF-424 form). The grantee may also avoid the potential need to conduct additional citizen participation on a Plan that has to be significantly revised in order to reflect actual allocation amounts.

Examples of contingency provisions include:

- A Plan could state that all proposed activities' budgets will be proportionally increased or decreased from the estimated funding levels to match actual allocation amounts.
- A grantee could express its budget in terms of percentages of the allocation to be budgeted to each planned activity, along with the grantee's current estimate of how many dollars that equates to for each activity. [For example, regardless of what the final allocation amounts are, the United Interfaith Street Outreach Program will receive 22% (currently estimated to be approximately \$38,000) of the grantee's total ESG allocation, and the Tenant-Based Rental Assistance activity will receive 10% (currently estimated to be about \$68,750) of the HOME allocation.]
- A Plan could state that any increase or decrease in funding to match actual allocation amounts will be applied to one or more specific activities (e.g., any increase or decrease relative to the grantee's estimated allocation amount will be applied to the single-family housing rehabilitation grant program).
- A Plan could list its proposed activities in priority order and indicate that the East Side Sidewalk Replacement activity listed in the plan is a "backup" activity that will be funded only if sufficient CDBG funding exists; or conversely, if the grantee's actual allocation is less than estimated, the East Side Sidewalk Replacement activity will not be funded in FY 2019.
- A Plan could state that, should the actual allocation amount exceed the grantee's estimate, the grantee will increase the Uptown Sewer Separation activity budget and will extend the service area block-by-block along the 600-900 blocks of Cherry Street, based on the amount of additional funding available.

A grantee may include these or other comparable provisions singly or in any combination to meet its needs. A grantee may adopt a different contingency approach for each of the programs covered by this Notice (CDBG, ESG, HOME, HOPWA and HTF).

- b. Alternatively, a grantee may prepare a proposed Action Plan according to its normal timetable, but wait until actual allocation amounts are known before undertaking citizen participation actions. Once allocation amounts are announced by HUD, the grantee

will need to update relevant sections of its Plan (such as the listings of resources and objectives, and the description of activities or the state's method of distribution) to reflect actual allocation amounts before conducting citizen participation. All grantees intending to incur pre-award costs under the programs covered by this Notice should be aware that this option will not be available to them, as citizen participation requirements must be met before pre-award costs are incurred. (See Section V. below.)

HUD has developed these procedures to minimize disruption to grantees and to minimize duplication of effort by grantees. A grantee that does not follow either option a. or b. above (i.e., the grantee undertakes citizen participation according to its normal timetable, based solely on estimated funding levels, and the Plan does not contain any contingency language on how the final Plan will be adjusted to match actual allocation amounts) runs the risk of increasing its own work obligations and costs. The grantee will still be required to update its Plan to incorporate actual allocation amounts before submission to HUD. The grantee may need to undertake additional publication and citizen participation processes, depending on the difference between its actual allocation amounts and the estimated amounts in its proposed Action Plan, and how the grantee plans to adjust its proposed activities in order to match its actual allocation amounts. Local policies and procedures may also require the grantee to obtain re-approval of the revised Plan from its legislative body or authorizing officials.

A Plan that has not yet been submitted to HUD is also not an approved Plan, and is not subject to the citizen participation requirements of a substantial amendment. However, a grantee that delays its Plan submission should review its citizen participation plan and local policies to determine whether it will need to conduct further citizen participation as a result of the changes it makes to incorporate actual allocation amounts into its Plan, prior to its submission.

V. Pre-Award Costs

A. General Provisions Applicable to All Consolidated Plan Programs

Special attention must be paid to situations in which a grantee wishes to incur costs prior to grant award. For example, under certain programs, a grantee may want to execute annual renewals of agreements with social service providers in order to prevent interruption of social services. The annual performance cycle of these agreements might normally begin after the grantee's official program year start date but, under this Notice the grantee cannot even submit its Action Plan until after the date that the agreements need to be executed. Thus, the timing instructions in this Notice may cause some program costs to be classified as pre-award costs where they would otherwise not have been.

The government-wide Uniform Administrative Requirements, Cost Principles and Audit Requirements regulation, at 2 CFR Part 200, contains language concerning agency approval of pre-award costs. The language at 2 CFR 200.458 applies to any program that does not have its own separate provisions concerning authorization of pre-award costs:

§ 200.458. Pre-award costs. Pre-award costs are those incurred prior to the effective date of the Federal award directly pursuant to the negotiation and in anticipation of the Federal award where such costs are necessary for efficient and timely performance of the scope of work. Such costs are allowable only to the extent that they would have been allowable if incurred after the date of the Federal award and only with the written approval of the Federal awarding agency.

The ESG, HOPWA and HTF program regulations do not contain program-specific language establishing pre-award cost requirements for those programs; the CDBG and HOME program regulations do contain pre-award cost requirements unique to those programs. (However, the HOME requirements apply only to certain types of pre-award costs.) The following guidance applies to all five programs. Additionally, guidance unique to each separate program is provided below.

The Part 91 Consolidated Plan regulations make distinctions between a "proposed Plan" and "a Plan". Most notably, 24 CFR 91.105(b) and 91.115(b) describe the citizen participation requirements for a grantee's proposed Plan. For purposes of this Notice regarding pre-award costs, HUD considers a grantee's Plan to have moved from being "a proposed Plan" to being "a Plan" once a grantee has completed the publication, public hearing and public comment requirements at 24 CFR 91.105(b)(2), (3) and (4) or 91.115(b)(2), (3) and (4), and has developed its written summary of comments received pursuant to 24 CFR 91.105(b)(5) or 91.115(b)(5).

To minimize additional workload on grantees and HUD field offices, this Notice establishes the following procedures implementing the 2 CFR 200.458 requirements cited above. This Notice provides HUD approval to incur pre-award costs if and when the grantee completes the following documentation in its local files:

1. The grantee documents that the costs incurred prior to grant award are necessary for efficient and timely performance of the activity in question.
2. The grantee documents that the costs are for eligible activities under the regulations for the applicable funding program;
3. The grantee documents that the grantee has complied with all other requirements for pre-award costs under the regulations for the applicable funding program or as described below;
4. The activity for which costs will be incurred is included in a Consolidated Plan/Action Plan;
5. The grantee documents completion of its citizen participation process by including in its files a written, dated summary of citizen participation comments received on its Plan, pursuant to 24 CFR 91.105(b)(5) or 91.115(b)(5) as applicable.

If the grantee's files contain all other necessary documentation supporting the costs (described below for each program), the date of HUD approval for pre-award costs is the date of the written summary of citizen participation comments, or the grantee's program year start date, whichever is later.

Note: Pre-award costs are incurred at the grantee's own risk because reimbursement is contingent upon the availability of appropriated funds for FY 2019 in addition to the applicable provisions listed in this section.

B. Additional Provisions: Entitlement CDBG Program

The Entitlement CDBG program regulations specify, at 24 CFR 570.200(h), the situations under which a grantee may incur costs prior to the effective date of its grant agreement. The provisions of this Notice will affect how grantees comply with the pre-award cost reimbursement requirements.

1. 24 CFR 570.200(h) defines the effective date of a grantee's agreement as the grantee's program year start date or the date that the Consolidated Plan/Action Plan is received by HUD (whichever is later). Under the provisions of this Notice, a grantee's Action Plan may not be submitted to (and thus received by) HUD until several months after the grantee's program year start date. This may negatively affect grantees' ability to incur pre-award costs.
2. Therefore, HUD has issued a waiver of 24 CFR 570.200(h) to the extent necessary to implement the following requirement: the effective date of a grantee's FY 2019 grant agreement will be considered to be the earlier of the grantee's program year start date or the date that the Consolidated Plan/Action Plan (with actual allocation amounts) is received by HUD. Attachment A contains the HUD memorandum authorizing this waiver. This waiver is applicable to any Entitlement CDBG grantee seeking to incur pre-award costs, whose Action Plan submission is delayed past the normal submission date because of delayed enactment of FY 2019 appropriations for the Department. An affected community applying this waiver shall document in writing the conditions giving rise to the need to use this waiver, and maintain the documentation for HUD's review. Grantees' authority to make use of this waiver is only in effect until August 16, 2019, as that is the last date that a grantee may submit its FY 2019 Action Plan.
3. 24 CFR 570.200(h)(1)(i) requires that the activity for which the costs are being incurred must be included in a Consolidated Plan/Action Plan prior to the costs being incurred; grantee compliance with steps 4 and 5 under the general pre-award cost provisions above will meet that requirement. However, grantees must also comply with §570.200(h)(1)(ii), which further specifies that the Plan must advise citizens of the extent to which the pre-award costs will affect future grants. CDBG grantees intending to incur pre-award costs are cautioned that option b. described in Section IV above is not likely to be a feasible alternative for them. HUD advises any Entitlement CDBG grantee intending to incur pre-award costs to follow the process described in Section IV. a. above; in doing so, the grantee will need to ensure that it has met the citizen participation and notification requirements above.
4. Pursuant to § 570.200(h)(1)(iii) and § 570.604, the costs and corresponding activities must comply with the environmental review requirements at 24 CFR Part 58.

C. Additional Provisions: HOME Program

The HOME regulations specify situations under which a grantee may incur costs prior to the effective date of its grant agreement. The provisions of this Notice will affect how grantees comply with the pre-award cost reimbursement requirements.

1. 24 CFR 92.212(b) defines the effective date for incurring administrative and planning costs to be charged to the HOME allocation as the beginning of the participating jurisdiction's consolidated program year or the date that the Consolidated Plan is received by HUD (whichever is later). Under the provisions of this Notice, a participating jurisdiction's Action Plan may not be submitted to (and thus received by) HUD until several months after the PJ's program year start date. This may negatively affect a participating jurisdiction's ability to incur planning and administrative pre-award costs. Therefore, HUD has issued a waiver of 24 CFR 92.212(b) to the extent necessary to implement an alternative requirement: the effective date of a grantee's FY 2019 grant agreement will be considered to be the earlier of the participating jurisdiction's program year start date or the date that the Consolidated Plan/Action Plan (with actual allocation amounts) is received by HUD.
2. Attachment A contains the HUD memorandum authorizing this waiver. This waiver is applicable to any HOME participating jurisdiction seeking to incur pre-award administrative and planning costs, whose Action Plan submission is delayed past the normal submission date because of delayed enactment of FY 2019 appropriations for the Department. An affected participating jurisdiction applying this waiver shall document in writing the conditions giving rise to the need to use this waiver, and maintain the documentation for HUD's review. A participating jurisdiction's authority to make use of this waiver is only in effect until August 16, 2019, as that is the last date that a grantee may submit its FY 2019 Action Plan.

D. Additional Provisions: ESG Program

An ESG grantee is permitted to incur pre-award costs against its FY 2019 grant, provided that the grantee has met the general conditions described in Section V.A., above, plus the following conditions:

1. The costs and corresponding activities must comply with the ESG Program regulations at 24 CFR Part 576.
2. The costs and corresponding activities must comply with environmental review requirements. The "Moving Ahead for Progress in the 21st Century Act" (MAP-21), (Public Law 112-141) made several changes to HUD's homeless assistance programs, including authorization to permit recipients and other responsible entities to assume HUD environmental review responsibilities in accordance with 24 CFR Part 58. Initially, for FY 2012 ESG funds, ESG projects were subject to the environmental review procedures under 24 CFR Part 50, which assigns HUD all environmental review responsibilities due to the HEARTH Act's repeal of Section 443 of the McKinney-Vento Homeless Assistance Act. Now, recipients or other Responsible Entities assume environmental review responsibilities

under 24 CFR Part 58.

E. Additional Provisions: HOPWA Program

A HOPWA grantee is permitted to incur pre-award costs against its FY 2019 grant, provided that the grantee has met the general conditions described in Section V.A., above, plus the following conditions:

1. The costs are incurred for eligible activities undertaken in accordance with HOPWA program regulations at 24 CFR Part 574.
2. The costs and corresponding activities must comply with environmental review requirements at 24 CFR 574.510.

F. Additional Provisions: HTF Program

HUD is authorizing HTF grantees to incur pre-award costs permitted under 2 CFR 200.458 for planning activities and preparation of the HTF allocation plan. Eligible pre-award costs may include the cost of public hearings, consultations, and publication of public notices, as well as developing program guidelines. Pre-award costs may not exceed 5% of the minimum allocation amount of \$3 million. This is one half of the grant amount that the state may use for administration and planning in accordance with 24 CFR 93.202, based on receiving a minimum grant amount. The costs and corresponding activities must comply with the environmental review requirements at 24 CFR 93.301(f).

VI. Opportunity Zones

Created by the 2017 Tax Cut and Jobs Act, the Opportunity Zone program is designed to stimulate private investment in designated, low-income census tracts nationwide. Since the passage of the law, Opportunity Zones (OZ) have been designated in all 50 states, the District of Columbia, Puerto Rico, and in Insular Areas.

Census tracts were eligible for designation as Opportunity Zones if they satisfied the definition of a "low-income community" (LIC) per § 45D(e) of the Internal Revenue Code. States were limited in the number of tracts they could designate as Opportunity Zones since the number of designated census tracts could not exceed 25 percent of the total number of tracts in the State that met the LIC definition.

The term "low-income community" means any census tract where: (a) the poverty rate for such tract is at least 20 percent, or (b)(i) in the case of a tract not located within a metropolitan area, the median family income for such tract does not exceed 80 percent of statewide median family income, or (b)(ii) in the case of a tract located within a metropolitan area, the median family income for such tract does not exceed 80 percent of the greater of statewide median family income or the metropolitan area median family income. For grantees who are familiar with using New Market Tax Credits (NMTC) as a source for community development finance, these eligibility criteria are the same as the requirements necessary to qualify for NMTC. It is worth noting that some non-LIC

tracts were also eligible for OZ designation if certain additional criteria were met.

This program incentivizes individuals and companies to invest equity in real estate projects or in businesses in these communities. It does so by enabling them to temporarily defer and reduce their tax liability on investments in privately- or publicly-managed Opportunity Funds. These Opportunity Funds must invest funds in real estate projects or businesses located in designated Opportunity Zones. Moreover, if investors leave their investments in these funds long-term, the profits they make on their Opportunity Fund investments will not be taxed.

HUD encourages Community Planning and Development (CPD) program grantees to consider the use of CDBG, HOME, ESG, HOPWA, and HTF funds for eligible activities in Opportunity Zones when developing their Consolidated Plans. CPD will be publishing further guidance in the near future which will provide additional information related to how program funds can be deployed to leverage Opportunity Zone financing.

In the interim, when considering strategies to facilitate the use of CDBG and Section 108 guaranteed loan funds in Opportunity Zones, CPD encourages grantees to explore whether these zones would also qualify as Neighborhood Revitalization Strategy Areas (NRSAs) under [CPD Notice 16-16](#). Compliance with certain CDBG requirements can be streamlined through the designation of NRSA's that may make it more feasible for grantees and their partners to leverage CDBG and Section 108 funds more quickly in Opportunity Zones.

VII. Applicability of This Notice to Future Years

This Notice applies only to Consolidated Plans/Action Plans submitted for FY 2019 funding on or before August 16, 2019, or 60 days after HUD announcement of the FY 2019 allocation amounts for CDBG, ESG, HOME, and HOPWA funding (whichever is earlier). HUD anticipates revising the Consolidated Plan regulations (and other related regulations) to explicitly include, as a basis for disapproval of a Plan, that a Plan does not contain and reflect a grantee's actual allocation amount. For further information on potential rulemaking in this area, see HUD's June 3, 2015, Federal Register Notice (80 FR 31538). That document solicited public comments on possible amendments to the Consolidated Plan regulations and the CDBG Entitlement regulations to effect such a change. See in particular Sections II.B.1., II.B.2 and II.B.7 of the Notice, pages 31544 and 31546. (Please note, however, that the public comment period for that Federal Register Notice has closed.)

For further information:

Grantees with questions concerning this Notice should direct their inquiries to their local HUD Field Office Community Planning and Development Division. Field Offices should direct their questions to the following Headquarters program offices as applicable:

Office of Block Grant Assistance at (202) 708-1577 for the Entitlement CDBG program or (202) 708-1322 for the State CDBG program
Office of Affordable Housing Programs at (202) 708-2684
Office of Special Needs Assistance Programs at (202) 708-4300
Office of HIV/AIDS Housing at (202) 708-1934 or at hopwa@hud.gov

12

ATTACHMENT A



ASSISTANT SECRETARY FOR
COMMUNITY PLANNING AND DEVELOPMENT

U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT
WASHINGTON, DC 20419-2000

NOV 30 2018

MEMORANDUM FOR: Community Planning and Development Field Office
Division Directors

FROM: 
Neal Kadloff, Assistant Secretary, D

SUBJECT: Availability of Waivers of Community Planning and Development
Grant Program Requirements to Facilitate the Ability to Incur
Pre-Award Costs in FY 2019

PURPOSE:

This memorandum explains the availability of waivers of certain statutory and regulatory requirements associated with two Community Planning and Development (CPD) grant programs to facilitate the continuation of eligible activities and ongoing planning and administrative costs due to a delay by HUD in the receipt of annual appropriations for FY 2019. This memorandum covers the following CPD programs:

- Community Development Block Grant (CDBG), and
- HOME Investment Partnerships (HOME)

BACKGROUND:

HUD is issuing procedures to govern the submission and review of action plans for FY 2019 funding prior to the enactment of a FY 2019 appropriation bill. Grantees are advised to not submit a consolidated plan or action plan until the FY 2019 formula allocations have been announced. However, an action plan must be submitted to HUD no later than August 16, 2019.

The likelihood of delays in the receipt of annual appropriations by HUD and implementation of these procedures for FY 2019 may have negative consequences for CDBG and HOME grantees that intend to incur eligible costs prior to the award of FY 2019 funding. Some activities might otherwise be interrupted, and grantees might not otherwise be able to use CDBG or HOME funds for planning and administrative costs of administering their programs.

www.hud.gov

espanol@hud.gov

HOME Covenant Language

HOME Covenant language for:
AP-90 #2 – Homebuyer Projects
AP-90 #3 – Acquisition

This is the text of the covenant used for HOME recapture, as referenced in AP-90 #2 (Homebuyer Projects) and #3 (Acquisition):

Throughout at least the Term of Affordability (which may range from 5 to 20 years from the date of sale to the low- or moderate-income homebuyer) the Project must be occupied by low- or moderate-income households (less than 80% Area median income) who occupy the property as their primary residence, within the meaning of the Rules; thus, this agreement for covenants and restrictions shall be recorded ahead of all other mortgages, deeds, liens, and encumbrances and shall run with the property throughout the Term of Affordability so that all succeeding owners must comply with the provisions contained herein or repay in accordance with the following HUD-sanctioned Shared Net Proceeds rule:

Net proceeds are defined by HUD as the sale price of the home, minus loan repayments and closing costs. Under this rule, the City and the homeowner selling the property share in any net proceeds upon the sale of the property. The proportional share is calculated by the following formula:

$$\frac{\text{HOME Downpayment Assistance}}{\text{HOME D. P. Assistance} + \text{homeowner investment}} \times \text{Net Proceeds} = \text{HOME amount recaptured}$$

$$\frac{\text{Homeowner Investment}}{\text{HOME D.P. Assistance} + \text{homeowner investment}} \times \text{Net Proceeds} = \text{homeowner repayment}$$

The homeowner investment includes the amount the homeowner contributed to the down payment and any capital improvements made to the property over time.

It should be noted that there are three outcomes under this rule. The first possible outcome is that the sale price of the home yields no net proceeds (or even a loss). In this case, the homeowner bears the burden of the loss and there is nothing for the City to recapture. However, the sale to the new buyer releases the new buyer from this Agreement and satisfies the HOME contract with the original buyer.

The second possible outcome is that the sale price yields net proceeds, but the amount is insufficient to repay both the City HOME investment and the homeowner investment in full. In this case, the formula above is applied and the City and the homeowner share in the net proceeds, each receiving less than originally invested. As an example, suppose the City's HOME down payment assistance was \$1,000 and the homeowner investment (additional down payment) was \$2,000. Further suppose that the net proceeds from the sale equal \$1,500. When the formula is applied, the City would recapture \$500 and the homeowner would receive \$1,000.

The third possible outcome is that the sale price of the home yields net proceeds greater than the City HOME and the homeowner investment. In this case, the formula above is again applied and the proceeds are shared. In following the same example wherein the HOME investment was \$1,000 and the homeowner investment was \$2,000, suppose the net proceeds equal \$3,600. In applying the formula, the City would recapture \$1,200 and the homeowner would receive \$2,400. Thus, both parties receive more than their initial investment.

Grantee SF-424's and Certification(s)

Signed Certifications and SF424 Forms

CERTIFICATIONS

In accordance with the applicable statutes and the regulations governing the consolidated plan regulations, the jurisdiction certifies that:

Affirmatively Further Fair Housing --The jurisdiction will affirmatively further fair housing.

Uniform Relocation Act and Anti-displacement and Relocation Plan -- It will comply with the acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended, (42 U.S.C. 4601-4655) and implementing regulations at 49 CFR Part 24. It has in effect and is following a residential anti-displacement and relocation assistance plan required under 24 CFR Part 42 in connection with any activity assisted with funding under the Community Development Block Grant or HOME programs.

Anti-Lobbying --To the best of the jurisdiction's knowledge and belief:

1. No Federal appropriated funds have been paid or will be paid, by or on behalf of it, to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with the awarding of any Federal contract, the making of any Federal grant, the making of any Federal loan, the entering into of any cooperative agreement, and the extension, continuation, renewal, amendment, or modification of any Federal contract, grant, loan, or cooperative agreement;
2. If any funds other than Federal appropriated funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this Federal contract, grant, loan, or cooperative agreement, it will complete and submit Standard Form-L.L.L., "Disclosure Form to Report Lobbying," in accordance with its instructions; and
3. It will require that the language of paragraph 1 and 2 of this anti-lobbying certification be included in the award documents for all subawards at all tiers (including subcontracts, subgrants, and contracts under grants, loans, and cooperative agreements) and that all subrecipients shall certify and disclose accordingly.

Authority of Jurisdiction --The consolidated plan is authorized under State and local law (as applicable) and the jurisdiction possesses the legal authority to carry out the programs for which it is seeking funding, in accordance with applicable HUD regulations.

Consistency with plan --The housing activities to be undertaken with Community Development Block Grant, HOME, Emergency Solutions Grant, and Housing Opportunities for Persons With AIDS funds are consistent with the strategic plan in the jurisdiction's consolidated plan.

Section 3 -- It will comply with section 3 of the Housing and Urban Development Act of 1968 (12 U.S.C. 1701u) and implementing regulations at 24 CFR Part 135.

	06/07/19
Signature of Authorized Official	Date

City Administrator

Title

Specific Community Development Block Grant Certifications

The Entitlement Community certifies that:

Citizen Participation -- It is in full compliance and following a detailed citizen participation plan that satisfies the requirements of 24 CFR 91.105.

Community Development Plan -- Its consolidated plan identifies community development and housing needs and specifies both short-term and long-term community development objectives that have been developed in accordance with the primary objective of the CDBG program (i.e., the development of viable urban communities, by providing decent housing and expanding economic opportunities, primarily for persons of low and moderate income) and requirements of 24 CFR Parts 91 and 570.

Following a Plan -- It is following a current consolidated plan that has been approved by HUD.

Use of Funds -- It has complied with the following criteria:

1. Maximum Feasible Priority. With respect to activities expected to be assisted with CDBG funds, it has developed its Action Plan so as to give maximum feasible priority to activities which benefit low- and moderate-income families or aid in the prevention or elimination of slums or blight. The Action Plan may also include CDBG-assisted activities which the grantee certifies are designed to meet other community development needs having particular urgency because existing conditions pose a serious and immediate threat to the health or welfare of the community, and other financial resources are not available (see Optional CDBG Certification).

2. Overall Benefit. The aggregate use of CDBG funds, including Section 108 guaranteed loans, during program year(s) 2018, 2019, 2020 [a period specified by the grantee of one, two, or three specific consecutive program years], shall principally benefit persons of low and moderate income in a manner that ensures that at least 70 percent of the amount is expended for activities that benefit such persons during the designated period.

3. Special Assessments. It will not attempt to recover any capital costs of public improvements assisted with CDBG funds, including Section 108 loan guaranteed funds, by assessing any amount against properties owned and occupied by persons of low and moderate income, including any fee charged or assessment made as a condition of obtaining access to such public improvements.

However, if CDBG funds are used to pay the proportion of a fee or assessment that relates to the capital costs of public improvements (assisted in part with CDBG funds) financed from other revenue sources, an assessment or charge may be made against the property with respect to the public improvements financed by a source other than CDBG funds.

In addition, in the case of properties owned and occupied by moderate-income (not low-income) families, an assessment or charge may be made against the property for public improvements financed by a source other than CDBG funds if the jurisdiction certifies that it lacks CDBG funds to cover the assessment.

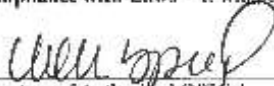
Excessive Force -- It has adopted and is enforcing:

1. A policy prohibiting the use of excessive force by law enforcement agencies within its jurisdiction against any individuals engaged in non-violent civil rights demonstrations; and
2. A policy of enforcing applicable State and local laws against physically barring entrance to or exit from a facility or location which is the subject of such non-violent civil rights demonstrations within its jurisdiction.

Compliance with Anti-discrimination laws – The grant will be conducted and administered in conformity with title VI of the Civil Rights Act of 1964 (42 U.S.C. 20003) and the Fair Housing Act (42 U.S.C. 3601-3619) and implementing regulations.

Lead-Based Paint – Its activities concerning lead-based paint will comply with the requirements of 24 CFR Part 35, Subparts A, B, J, K and R.

Compliance with Laws – It will comply with applicable laws.



Signature of Authorized Official

06/07/19

Date

City Administrator

Title

OPTIONAL Community Development Block Grant Certification

Submit the following certification only when one or more of the activities in the action plan are designed to meet other community development needs having particular urgency as specified in 24 C.F.R. 570.208(e):

The grantee hereby certifies that the Annual Plan includes one or more specifically identified CDBG-assisted activities which are designed to meet other community development needs having particular urgency because existing conditions pose a serious and immediate threat to the health or welfare of the community and other financial resources are not available to meet such needs.

Not Applicable

Signature of Authorized Official

Date

Title

Specific HOME Certifications

The HOME participating jurisdiction certifies that:

Tenant Based Rental Assistance -- If it plans to provide tenant-based rental assistance, the tenant-based rental assistance is an essential element of its consolidated plan.

Eligible Activities and Costs -- It is using and will use HOME funds for eligible activities and costs, as described in 24 CFR §§92.205 through 92.209 and that it is not using and will not use HOME funds for prohibited activities, as described in §92.214.

Subsidy layering -- Before committing any funds to a project, it will evaluate the project in accordance with the guidelines that it adopts for this purpose and will not invest any more HOME funds in combination with other Federal assistance than is necessary to provide affordable housing;


Signature of Authorized Official

06/07/19
Date

City Administrator _____
Title

Emergency Solutions Grants Certifications

The Emergency Solutions Grants Program recipient certifies that:

Major rehabilitation/conversion/renovation – If an emergency shelter's rehabilitation costs exceed 75 percent of the value of the building before rehabilitation, the recipient will maintain the building as a shelter for homeless individuals and families for a minimum of 10 years after the date the building is first occupied by a homeless individual or family after the completed rehabilitation.

If the cost to convert a building into an emergency shelter exceeds 75 percent of the value of the building after conversion, the recipient will maintain the building as a shelter for homeless individuals and families for a minimum of 10 years after the date the building is first occupied by a homeless individual or family after the completed conversion.

In all other cases where ESG funds are used for renovation, the recipient will maintain the building as a shelter for homeless individuals and families for a minimum of 3 years after the date the building is first occupied by a homeless individual or family after the completed renovation.

Essential Services and Operating Costs – In the case of assistance involving shelter operations or essential services related to street outreach or emergency shelter, the recipient will provide services or shelter to homeless individuals and families for the period during which the ESG assistance is provided, without regard to a particular site or structure, so long the recipient serves the same type of persons (e.g., families with children, unaccompanied youth, disabled individuals, or victims of domestic violence) or persons in the same geographic area.

Renovation – Any renovation carried out with ESG assistance shall be sufficient to ensure that the building involved is safe and sanitary.

Supportive Services – The recipient will assist homeless individuals in obtaining permanent housing, appropriate supportive services (including medical and mental health treatment, victim services, counseling, supervision, and other services essential for achieving independent living), and other Federal, State, local, and private assistance available for these individuals.

Matching Funds – The recipient will obtain matching amounts required under 24 CFR 576.201.

Confidentiality – The recipient has established and is implementing procedures to ensure the confidentiality of records pertaining to any individual provided family violence prevention or treatment services under any project assisted under the ESG program, including protection against the release of the address or location of any family violence shelter project, except with the written authorization of the person responsible for the operation of that shelter.

Homeless Persons Involvement – To the maximum extent practicable, the recipient will involve, through employment, volunteer services, or otherwise, homeless individuals and families in constructing, renovating, maintaining, and operating facilities assisted under the ESG program, in providing services assisted under the ESG program, and in providing services for occupants of facilities assisted under the program.

Consolidated Plan – All activities the recipient undertakes with assistance under ESG are consistent with its consolidated plan.

Discharge Policy – The recipient will establish and implement, to the maximum extent practicable and where appropriate, policies and protocols for the discharge of persons from publicly funded institutions or systems of care (such as health care facilities, mental health facilities, foster care or other youth facilities, or correction programs and institutions) in order to prevent this discharge from immediately resulting in homelessness for those persons.

Not Applicable

Signature of Authorized Official

Date

Title

Housing Opportunities for Persons With AIDS Certifications

The HOPWA grantee certifies that:

Activities – Activities funded under the program will meet urgent needs that are not being met by available public and private sources.

Building – Any building or structure assisted under that program shall be operated for the purpose specified in the consolidated plan:

1. For a period of not less than 10 years in the case of assistance involving new construction, substantial rehabilitation, or acquisition of a facility.
2. For a period of not less than 3 years in the case of assistance involving non-substantial rehabilitation or repair of a building or structure.

Not Applicable

Signature of Authorized Official

Date

Title

APPENDIX TO CERTIFICATIONS

INSTRUCTIONS CONCERNING LOBBYING CERTIFICATION:

Lobbying Certification

This certification is a material representation of fact upon which reliance was placed when this transaction was made or entered into. Submission of this certification is a prerequisite for making or entering into this transaction imposed by section 1352, title 31, U.S. Code. Any person who fails to file the required certification shall be subject to a civil penalty of not less than \$10,000 and not more than \$100,000 for each such failure.

Application for Federal Assistance SF-424		
* 1. Type of Submission: <input type="checkbox"/> Preapplication <input checked="" type="checkbox"/> Application <input type="checkbox"/> Changed/Corrected Application	* 2. Type of Application: <input checked="" type="checkbox"/> New <input type="checkbox"/> Continuation <input type="checkbox"/> Revision	* 3. Revision, select appropriate letters: _____ * Other (Specify): _____
* 3. Date Received: []	4. Applicant Identifier: 6-19-NO-19-0003	
5a. Federal Entity Identifier: []	5b. Federal Award Identifier: []	
State Use Only:		
6. Date Received by State: []	7. State Application Identifier: []	
B. APPLICANT INFORMATION:		
* 8. Legal Name: City of Davenport, Iowa		
* 9. Employer/ taxpayer identification number (EIN/TIN): 13-6505163	* 10. Organizational OUNS: 0201969570003	
d. Address:		
* Street: 226 W. 4th Street	[]	
* Street 2: []	[]	
* City: Davenport	[]	
* County/Parish: []	[]	
* State: IA Iowa	[]	
* Province: []	[]	
* Country: USA: UNITED STATES	[]	
* Zip/Postal Code: 52001-1234	[]	
e. Organizational Unit:		
Department Name: City of Davenport	Division Name: Comm. Development, Budget, Grants	
f. Name and contact information of person to be contacted on matters involving this application:		
Prefix: []	* First Name: Luisa	[]
Middle Name: []	[]	
* Last Name: Gonzalez	[]	
* Suffix: []	[]	
* Title: Community Development, Research Manager		
Organizational Affiliation: []		
* Telephone Number: 563-326-3004	* Fax Number: 563-326-6714	
* Email: lgonzalez@davenport,ia.gov		

Application for Federal Assistance SF-424	
* 9. Type of Applicant 1: Select Applicant Type: <input type="text" value="City or Township Government"/> Type of Applicant 2: Select Applicant Type: <input type="text"/> Type of Applicant 3: Select Applicant Type: <input type="text"/> * Other (Specify): <input type="text"/>	
* 10. Name of Federal Agency: <input type="text" value="US Department of Housing & Urban Development"/>	
11. Catalog of Federal Domestic Assistance Number: <input type="text" value="14-018"/> CFDA Title: <input type="text" value="Community Development Block Grant"/>	
* 12. Funding Opportunity Number: <input type="text" value="1500"/> * Title: <input type="text" value="Community Development Block Grant"/>	
13. Competition Identification Number: <input type="text"/> Title: <input type="text"/>	
14. Areas Affected by Project (Cities, Counties, States, etc.): <input type="text"/> <input type="button" value="Add Attachment"/> <input type="button" value="Delete Attachment"/> <input type="button" value="View Attachment"/>	
* 15. Descriptive Title of Applicant's Project: <input type="text" value="Community Development Block Grant"/>	
Attach reporting documents as specified in agency instructions. <input type="button" value="Add Attachments"/> <input type="button" value="Delete Attachments"/> <input type="button" value="View Attachments"/>	

Application for Federal Assistance SF-424	
16. Congressional Districts Of:	
*a Applicant: IA-001	*b Program/Project: IA-001
Attach an additional list of Program/Project Congressional Districts if needed.	
<input type="text"/> <input type="button" value="Add Attachment"/> <input type="button" value="Delete Attachment"/> <input type="button" value="View Attachment"/>	
17. Proposed Project:	
*a Start Date: 09/01/2019	*b End Date: 06/30/2020
18. Estimated Funding (\$):	
*a Federal	1,400,000.00
*b Applicant	
*c State	
*d Local	
*e Other	
*f Program Income	500,000.00
*g TOTAL	1,900,000.00
19. Is Application Subject to Review By State Under Executive Order 12372 Process?	
<input type="checkbox"/> a. This application was made available to the State under the Executive Order 12372 Process for review on <input type="text"/>	
<input type="checkbox"/> b. Program is subject to E.O. 12372 but has not been selected by the State for review.	
<input checked="" type="checkbox"/> c. Program is not covered by E.O. 12372.	
20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes," provide explanation in attachment.)	
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
If "Yes", provide explanation and attach:	
<input type="text"/> <input type="button" value="Add Attachment"/> <input type="button" value="Delete Attachment"/> <input type="button" value="View Attachment"/>	
21. "By signing this application, I certify (1) to the statements contained in the list of certifications** and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances** and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 28, Section 1001)	
<input checked="" type="checkbox"/> ** I AGREE	
** The list of certifications and assurances, or an internet site where you may obtain this list, is contained in the announcement or agency specific instructions.	
Authorized Representative:	
Prefix: Mr.	* First Name: David
Middle Name:	
* Last Name: Spiegel	
Suffix:	
* Title: City Administrator	
* Telephone Number: 562-450-7711	* Fax Number:
* Email: dsiegel@ci.davenport.ia.us	
* Signature of Authorized Representative:	* Date Signed: 05/09/2019

ASSURANCES - CONSTRUCTION PROGRAMS

OMB Number: 4040-0009
Expiration Date: 02/28/2022

Public reporting burden for this collection of information is estimated to average 15 minutes per response, including time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to the Office of Management and Budget, Paperwork Reduction Project (0348-0042), Washington, DC 20503.

PLEASE DO NOT RETURN YOUR COMPLETED FORM TO THE OFFICE OF MANAGEMENT AND BUDGET. SEND IT TO THE ADDRESS PROVIDED BY THE SPONSORING AGENCY.

NOTE: Certain of these assurances may not be applicable to your project or program. If you have questions, please contact the Awarding Agency. Further, certain Federal assistance awarding agencies may require applicants to certify to additional assurances. If such is the case, you will be notified.

As the duly authorized representative of the applicant, I certify that the applicant:

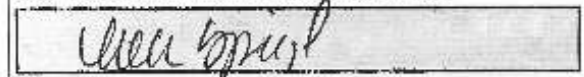
1. Has the legal authority to apply for Federal assistance, and the institutional, managerial, and financial capability (including funds sufficient to pay the non-Federal share of project costs) to ensure proper planning, management and completion of project described in this application.
2. Will give the awarding agency, the Comptroller General of the United States and, if appropriate, the State, the right to examine all records, books, papers, or documents related to the assistance; and will establish a proper accounting system in accordance with generally accepted accounting standards or agency directives.
3. Will not dispose of, modify the use of, or change the terms of the real property title or other interest in the site and facilities without permission and instructions from the awarding agency. Will record the Federal awarding agency directives and will include a covenant in the title of real property acquired in whole or in part with Federal assistance funds to assure non-discrimination during the useful life of the project.
4. Will comply with the requirements of the assistance awarding agency with regard to the drafting, review and approval of construction plans and specifications.
5. Will provide and maintain competent and adequate engineering supervision at the construction site to ensure that the complete work conforms with the approved plans and specifications and will furnish progressive reports and such other information as may be required by the assistance awarding agency or State.
6. Will initiate and complete the work within the applicable time frame after receipt of approval of the awarding agency.
7. Will establish safeguards to prohibit employees from using their positions for a purpose that constitutes or presents the appearance of personal or organizational conflict of interest, or personal gain.
8. Will comply with the Intergovernmental Personnel Act of 1970 (42 U.S.C. §§4728-4783) relating to prescribed standards of merit systems for programs funded under one of the 19 statutes or regulations specified in Appendix A of OPM's Standards for a Merit System of Personnel Administration (5 C.F.R. 900, Subpart F).
9. Will comply with the Lead-Based Paint Poisoning Prevention Act (42 U.S.C. §§1901 et seq.) which prohibits the use of lead-based paint in construction or rehabilitation of residence structures.
10. Will comply with all Federal statutes relating to non-discrimination. These include but are not limited to: (a) Title VI of the Civil Rights Act of 1964 (P.L. 88-352) which prohibits discrimination on the basis of race, color or national origin; (b) Title IX of the Education Amendments of 1972, as amended (20 U.S.C. §§1581-1683, and 1685-1686), which prohibits discrimination on the basis of sex; (c) Section 504 of the Rehabilitation Act of 1973, as amended (29 U.S.C. §794), which prohibits discrimination on the basis of handicaps; (d) the Age Discrimination Act of 1975, as amended (42 U.S.C. §§6101-6107), which prohibits discrimination on the basis of age; (e) the Drug Abuse Office and Treatment Act of 1972 (P.L. 92-255), as amended relating to nondiscrimination on the basis of drug abuse; (f) the Comprehensive Alcohol Abuse and Alcoholism Prevention, Treatment and Rehabilitation Act of 1970 (P.L. 91-613), as amended, relating to nondiscrimination on the basis of alcohol abuse or alcoholism; (g) §§523 and 527 of the Public Health Service Act of 1912 (42 U.S.C. §§290 dd-3 and 290 ee 3), as amended, relating to confidentiality of alcohol and drug abuse patient records; (h) Title VII of the Civil Rights Act of 1964 (42 U.S.C. §§3601 et seq.), as amended, relating to nondiscrimination in the sale, rental or financing of housing; (i) any other nondiscrimination provisions in the specific statute(s) under which application for Federal assistance is being made; and (j) the requirements of any other nondiscrimination statute(s) which may apply to the application.

Previous Edition Usable

Authorized for Local Reproduction

Standard Form 424D (Rev. 7-87)
Prescribed by OMB Circular A-102

11. Will comply, or has already complied, with the requirements of Titles II and III of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (P.L. 91-648) which provide for fair and equitable treatment of persons displaced or whose property is acquired as a result of Federal and federally-assisted programs. These requirements apply to all interests in real property acquired for project purposes regardless of Federal participation in purchases.
12. Will comply with the provisions of the Hatch Act (5 U.S.C. §§1501-1508 and 7524-7528) which limit the political activities of employees whose principal employment activities are funded in whole or in part with Federal funds.
13. Will comply, as applicable, with the provisions of the Davis-Bacon Act (40 U.S.C. §§275a to 275a-7), the Copeland Act (40 U.S.C. §276c and 18 U.S.C. §874), and the Contract Work Hours and Safety Standards Act (40 U.S.C. §§327-235) regarding labor standards for federally-assisted construction subagreements.
14. Will comply with flood insurance purchase requirements of Section 152(a) of the Flood Disaster Protection Act of 1973 (P.L. 93-234) which requires recipients in a special flood hazard area to participate in the program and to purchase flood insurance if the total cost of insurable construction and acquisition is \$10,000 or more.
15. Will comply with environmental standards which may be prescribed pursuant to the following: (a) institution of environmental quality control measures under the National Environmental Policy Act of 1969 (P.L. 91-190) and Executive Order (EO) 11514; (b) notification or violation facilities pursuant to EO 11736; (c) protection of wetlands pursuant to EO 11890; (d) evaluation of flood hazards in floodplains in accordance with EO 11988; (e) assurance of project consistency with the approved State management program developed under the Coastal Zone Management Act of 1972 (16 U.S.C. §§1601 et seq.); (f) conformity of Federal actions to State (Clean Air) Implementation Plans under Section 176(c) of the Clean Air Act of 1955, as amended (42 U.S.C. §§7401 et seq.); (g) protection of underground sources of drinking water under the Safe Drinking Water Act of 1974, as amended (P.L. 93-523), and, (h) protection of endangered species under the Endangered Species Act of 1973, as amended (P.L. 93-205).
16. Will comply with the Wild and Scenic Rivers Act of 1968 (16 U.S.C. §§1271 et seq.) related to protecting components or potential components of the national wild and scenic rivers system.
17. Will assist the awarding agency in assuring compliance with Section 106 of the National Historic Preservation Act of 1966, as amended (16 U.S.C. §470), EO 11593 (identification and protection of historic properties), and the Archeological and Historic Preservation Act of 1974 (16 U.S.C. §§452a-1 et seq.).
18. Will cause to be performed the required financial and compliance audits in accordance with the Single Audit Act Amendments of 1996 and OMB Circular No. A-133, "Audits of States, Local Governments, and Non-Profit Organizations."
19. Will comply with all applicable requirements of all other Federal laws, executive orders, regulations, and policies governing this program.
20. Will comply with the requirements of Section 106(g) of the Trafficking Victims Protection Act (TVPA) of 2000, as amended (22 U.S.C. 7104) which prohibits grant award recipients or a sub-recipient from (1) Engaging in severe forms of trafficking in persons during the period of time that the award is in effect (2) Procuring a commercial sex act during the period of time that the award is in effect or (3) Using forced labor in the performance of the award or subawards under the award.

SIGNATURE OF AUTHORIZED CERTIFYING OFFICIAL	TITLE
	City Administrator
APPLICANT ORGANIZATION	DATE SUBMITTED
City of Waverport, Iowa	06/29/2015

SF 424D (Rev. 7-97) Back

Application for Federal Assistance SF-424		
* 1. Type of Submission: <input type="checkbox"/> Preapplication <input checked="" type="checkbox"/> Application <input type="checkbox"/> Changed/Corrected Application	* 2. Type of Application: <input checked="" type="checkbox"/> New <input type="checkbox"/> Continuation <input type="checkbox"/> Revision	* If Revision, select appropriate letter(s): <input type="text"/> * Other (Specify): <input type="text"/>
* 3. Date Received: <input type="text"/>	4. Applicant Identifier: N-15-90-17-0000 <input type="text"/>	
5a. Federal Entity Identifier: <input type="text"/>	5b. Federal Award Identifier: <input type="text"/>	
State Use Only:		
6. Date Received by State: <input type="text"/>	7. State Application Identifier: <input type="text"/>	
8. APPLICANT INFORMATION:		
* a. Legal Name: <input type="text" value="City of Davenport"/>		
* b. Employer/Taxpayer Identification Number (EIN/TIN): <input type="text" value="00-0000000"/>	* c. Organizational OUNS: <input type="text" value="000000000000"/>	
d. Address:		
* Street1: <input type="text" value="226 N. 4th Street"/>	<input type="text"/>	
* Street2: <input type="text"/>	<input type="text"/>	
* City: <input type="text" value="Davenport"/>	<input type="text"/>	
* County/Parish: <input type="text"/>	<input type="text"/>	
* State: <input type="text" value="IA: Iowa"/>	<input type="text"/>	
* Province: <input type="text"/>	<input type="text"/>	
* Country: <input type="text" value="USA: UNITED STATES"/>	<input type="text"/>	
* Zip / Postal Code: <input type="text" value="52001-0000"/>	<input type="text"/>	
e. Organizational Unit:		
Department Name: <input type="text"/>	Division Name: <input type="text"/>	
f. Name and contact information of person to be contacted on matters involving this application:		
Prefix: Mr. <input type="text"/>	* First Name: <input type="text" value="Dana-Louise"/>	
Middle Name: <input type="text"/>	<input type="text"/>	
* Last Name: <input type="text" value="Johnson"/>	<input type="text"/>	
Suffix: <input type="text"/>	<input type="text"/>	
Title: <input type="text" value="Community Development Resource Manager"/>		
Organizational Affiliation: <input type="text"/>		
* Telephone Number: <input type="text" value="562-888-2004"/>	Fax Number: <input type="text" value="562-325-5714"/>	
* Email: <input type="text" value="djohnson@cityofdavenport.org"/>		

Application for Federal Assistance SF-424	
* 8. Type of Applicant 1: Select Applicant Type: <input type="text" value="City or Township Government"/>	
Type of Applicant 2: Select Applicant Type: <input type="text"/>	
Type of Applicant 3: Select Applicant Type: <input type="text"/>	
* Other (specify): <input type="text"/>	
* 9. Name of Federal Agency: <input type="text" value="US Department of Housing & Urban Development"/>	
11. Catalog of Federal Domestic Assistance Number: <input type="text" value="14-239"/>	
CFDA Title: <input type="text" value="HOME Investment Partnership"/>	
* 12. Funding Opportunity Number: <input type="text" value="HOME Investment"/>	
* Title: <input type="text" value="HOME Investment Partnership"/>	
13. Competition Identification Number: <input type="text"/>	
Title: <input type="text"/>	
14. Areas Affected by Project (Cities, Counties, States, etc.): <input type="text"/> <div style="display: flex; justify-content: space-between; margin-top: 5px;"> Add Attachment Delete Attachments New Attachment </div>	
* 15. Descriptive Title of Applicant's Project: <input type="text" value="HOME Investment Partnership"/>	
Attach supporting documents as specified in agency instructions <div style="display: flex; justify-content: space-between; margin-top: 5px;"> Add Attachments Delete Attachments View Attachments </div>	

Application for Federal Assistance SF-424

16. Congressional Districts Of:

* a. Applicant: [TA-001] * b. Program/Project: [TA-001]

Attach an additional list of Program/Project Congressional Districts if needed.

[] Add Attachment [] Delete Attachment [] View Attachment

17. Proposed Project:

* a. Start Date: [07/01/2019] * b. End Date: [05/30/2020]

18. Estimated Funding (\$):

* a. Federal	432,858.00
* b. Applicant	
* c. State	
* d. Local	
* e. Other	
* f. Program Income	200,000.00
* g. TOTAL	632,858.00

19. Is Application Subject to Review By State Under Executive Order 12372 Process?

a. This application was made available to the State under the Executive Order 12372 Process for review on []

b. Program is subject to E.O. 12372 but has not been selected by the State for review.

c. Program is not covered by E.O. 12372.

20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes," provide explanation in attachment.)

Yes No

If "Yes", provide explanation and attach

[] Add Attachment [] Delete Attachment [] View Attachment

21. *By signing this application, I certify (1) to the statements contained in the list of certifications and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances** and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 28, Section 1001)**

** I AGREE

** The list of certifications and assurances, or an internet site where you may obtain this list, is contained in the announcement or agency specific instructions.

Authorized Representative:

Prof: [Ms.] * First Name: [COURT]

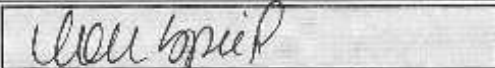
Mobile Name: []

* Last Name: [SPRING] Suffix: []

* Title: [City Administrator]

* Telephone Number: [503 328 9711] Fax Number: []

* Email: [springcourt@seaside.gov]

* Signature of Authorized Representative:  * Date Signed: [05/07/2019]

ASSURANCES - CONSTRUCTION PROGRAMS

OMB Number: 4840-0009
Expiration Date: 02/28/2022

Public reporting burden for this collection of information is estimated to average 15 minutes per response, including time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to the Office of Management and Budget, Paperwork Reduction Project (0348-0042), Washington, DC 20503.

PLEASE DO NOT RETURN YOUR COMPLETED FORM TO THE OFFICE OF MANAGEMENT AND BUDGET. SEND IT TO THE ADDRESS PROVIDED BY THE SPONSORING AGENCY.

NOTE: Certain of these assurances may not be applicable to your project or program. If you have questions, please contact the Awarding Agency. Further, certain Federal assistance awarding agencies may require applicants to certify to additional assurances. If such is the case, you will be notified.

As the duly authorized representative of the applicant, I certify that the applicant:

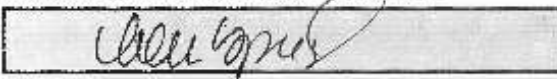
1. Has the legal authority to apply for Federal assistance, and the institutional, managerial and financial capability (including funds sufficient to pay the non-Federal share of project costs) to ensure proper planning, management and completion of project described in this application.
2. Will give the awarding agency, the Comptroller General of the United States and, if appropriate, the State, the right to examine all records, books, papers, or documents related to the assistance; and will establish a proper accounting system in accordance with generally accepted accounting standards or agency directives.
3. Will not dispose of, modify the use of, or change the terms of the real property title or other interests in the site and facilities without permission and instructions from the awarding agency. Will secure the Federal awarding agency directives and will include a covenant in the title of real property acquired in whole or in part with Federal assistance funds to assure non-discrimination during the useful life of the project.
4. Will comply with the requirements of the assistance awarding agency with regard to the drafting, review and approval of construction plans and specifications.
5. Will provide and maintain competent and adequate engineering supervision at the construction site to ensure that the complete work conforms with the approved plans and specifications and will furnish progressive reports and such other information as may be required by the assistance awarding agency or State.
6. Will initiate and complete the work within the applicable time frame after receipt of approval of the awarding agency.
7. Will establish safeguards to prohibit employees from using their positions for a purpose that constitutes or presents the appearance of personal or organizational conflict of interest, or personal gain.
8. Will comply with the Intergovernmental Personnel Act of 1970 (42 U.S.C. §§4728-4763) relating to prescribed standards of merit systems for programs funded under one of the 19 statutes or regulations specified in Appendix A of OPM's Standards for a Merit System of Personnel Administration (5 C.F.R. 900, Subpart F).
9. Will comply with the Lead-Based Paint Poisoning Prevention Act (42 U.S.C. §§4601 et seq.) which prohibits the use of lead-based paint in construction or rehabilitation of residence structures.
10. Will comply with all Federal statutes relating to non-discrimination. These include but are not limited to: (a) Title VI of the Civil Rights Act of 1964 (P.L. 88-352) which prohibits discrimination on the basis of race, color or national origin; (b) Title IX of the Education Amendments of 1972, as amended (20 U.S.C. §§1681-1683, and 1685-1686) which prohibits discrimination on the basis of sex; (c) Section 504 of the Rehabilitation Act of 1973, as amended (29 U.S.C. §794), which prohibits discrimination on the basis of handicaps; (d) the Age Discrimination Act of 1975, as amended (42 U.S.C. §§6101-6107), which prohibits discrimination on the basis of age; (e) the Drug Abuse Office and Treatment Act of 1972 (P.L. 92-255), as amended relating to nondiscrimination on the basis of drug abuse; (f) the Comprehensive Alcohol Abuse and Alcoholism Prevention, Treatment and Rehabilitation Act of 1970 (P.L. 91-616), as amended, relating to nondiscrimination on the basis of alcohol abuse or alcoholism; (g) §§523 and 527 of the Public Health Service Act of 1912 (42 U.S.C. §§290 de-3 and 290 ee 3), as amended, relating to confidentiality of alcohol and drug abuse patient records; (h) Title VIII of the Civil Rights Act of 1968 (42 U.S.C. §§3601 et seq.), as amended, relating to nondiscrimination in the sale, rental or financing of housing; (i) any other nondiscrimination provisions in the specific statute(s) under which application for Federal assistance is being made; and (j) the requirements of any other nondiscrimination statute(s) which may apply to the application.

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Standard Form 424D (Rev. 7-67)
Prescribed by OMB Circular A-102

11. Will comply, or has already complied, with the requirements of Titles II and III of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (P.L. 91-646) which provide for fair and equitable treatment of persons displaced or whose property is acquired as a result of Federal and federally-assisted programs. These requirements apply to all interests in real property acquired for project purposes regardless of Federal participation in purchases.
12. Will comply with the provisions of the Hatch Act (5 U.S.C. §§1501-1509 and 7324-7329) which limit the political activities of employees whose principal employment activities are funded in whole or in part with Federal funds.
13. Will comply, as applicable, with the provisions of the Davis Bacon Act (40 U.S.C. §§276a to 276a-7), the Copeland Act (40 U.S.C. §276c and 18 U.S.C. §874), and the Contract Work Hours and Safety Standards Act (40 U.S.C. §§327-333) regarding labor standards for federally-assisted construction subagreements.
14. Will comply with flood insurance purchase requirements of Section 102(a) of the Flood Disaster Protection Act of 1973 (P.L. 93-234) which requires recipients in a special flood hazard area to participate in the program and to purchase flood insurance if the total cost of insurable construction and acquisition is \$10,000 or more.
15. Will comply with environmental standards which may be prescribed pursuant to the following: (a) institution of environmental quality control measures under the National Environmental Policy Act of 1969 (P.L. 91-190) and Executive Order (EO) 11514; (b) notification of violating facilities pursuant to EO 11738; (c) protection of wetlands pursuant to EO 11990; (d) evaluation of flood hazards in floodplains in accordance with EO 11989; (e) assurance of project consistency with the approved State management program developed under the Coastal Zone Management Act of 1972 (16 U.S.C. §§1451 et seq.); (f) conformity of Federal actions to State (Clean Air) implementation Plans under Section 176(c) of the Clean Air Act of 1955, as amended (42 U.S.C. §§7401 et seq.); (g) protection of underground sources of drinking water under the Safe Drinking Water Act of 1974, as amended (P.L. 93-523) and (h) protection of endangered species under the Endangered Species Act of 1973, as amended (P.L. 93-205).
16. Will comply with the Wild and Scenic Rivers Act of 1968 (16 U.S.C. §§1271 et seq.) related to protecting components or potential components of the national wild and scenic rivers system.
17. Will assist the awarding agency in assuring compliance with Section 106 of the National Historic Preservation Act of 1966, as amended (16 U.S.C. §470), EO 11593 (identification and protection of historic properties), and the Archaeological and Historic Preservation Act of 1974 (16 U.S.C. §§469a-1 et seq.).
18. Will cause to be performed the required financial and compliance audits in accordance with the Single Audit Act Amendments of 1996 and OMB Circular No. A-133, "Audits of States, Local Governments, and Non-Profit Organizations."
19. Will comply with all applicable requirements of all other Federal laws, executive orders, regulations, and policies governing this program.
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SIGNATURE OF AUTHORIZED CERTIFYING OFFICIAL	TITLE
	City Administrator
APPLICANT ORGANIZATION	DATE SUBMITTED
City of Davenport, Iowa	05/07/2019

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