

**ANNUAL ACTION PLAN
FEDERAL FISCAL YEAR 2018**

**Program Year 44
July 1, 2018 to June 30, 2019**



**City of
Davenport**



Submitted to HUD
June 28, 2018
Accepted by HUD
August 22, 2018



Third 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.

Table of Contents

AP-05 Executive Summary - 24 CFR 91.200(c), 91.220(b)	3
PR-05 Lead & Responsible Agencies – 91.200(b).....	7
AP-10 Consultation – 91.100, 91.200(b), 91.215(l).....	8
AP-12 Participation – 91.105, 91.200(c)	25
AP-15 Expected Resources – 91.220(c)(1,2)	29
AP-20 Annual Goals and Objectives.....	33
AP-35 Projects – 91.220(d)	36
AP-38 Project Summary	38
AP-50 Geographic Distribution – 91.220(f).....	45
AP-55 Affordable Housing – 91.220(g)	47
AP-60 Public Housing – 91.220(h).....	49
AP-65 Homeless and Other Special Needs Activities – 91.220(i).....	51
AP-75 Barriers to affordable housing – 91.220(j)	53
AP-85 Other Actions – 91.220(k)	55
AP-90 Program Specific Requirements – 91.220(l)(1,2,4)	58
Attachments.....	61
Citizen Participation Comments	62
HUD Guidance.....	76
HOME Covenant Language	91
Draft Citizen Participation Plan.....	93

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, 2018 through June 30, 2019.

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, 2018:

- The CDBG allocation represents a 45% cut from the highest funding year,
- The HOME allocation represents a 55% 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 FY18 allocations would occur. HUD advised in CPD Notice 18-01 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 44, which were adopted by the City Council on October 25, 2017:

- 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 2017.

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. 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 2018 annual plan and availability of CDBG and HOME funding was 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 44 CDBG allocations on March 21, 2018. No comments were received at the Public Hearing.

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 18-01 dated January 24, 2018 for delayed submission of the annual plan. A copy of this document is attached to the plan.

The Annual Action Plan will be available for public comment for 30 days (from April 19, 2018 to May 18, 2018). Comments that are received during the comment period, and the City's response to them, will be included in the attachments. Public comment will also be collected during the City Council's consideration of approval of the Annual Action Plan. Comments received during the meetings, and the City's response to them, will be included in the attachments.

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

If any comments are received during the comment period they will be included in the plan with a response.

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

Consolidated Plan Public Contact Information

This annual plan is part of the 2015-2019 Five Year Consolidated Plan. The plan is available for review in the following locations:

- Davenport Main Public Library, 321 N. Main Street, Davenport, IA 52801
- Davenport Fairmount Street Branch Library, 3000 N. Fairmount Street, Davenport, IA 52804
- Davenport Eastern Avenue Branch Library, 6000 Eastern Avenue, Davenport, IA 52807
- Online at : www.cityofdavenportiowa.com
- A reasonable number of paper copies are available upon request
- Oral interpretation is available to Limited English Proficiency residents upon request
- Formats accessible to residents with disabilities are available upon request

Interpretive services are available at no charge. Servicios interpretativos libres estan disponibles. If accommodations are needed for any reason, please contact our office.

Questions regarding the Consolidated Plan and Annual Action Plans and requests for interpretive services or other accomodations can be directed to Community Planning and Economic Development, 226 W. 4th Street, Davenport, IA 52801 or at 563-326-7765 or TTY 563-326-6145.

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 and Girls Clubs 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 Family Service Center
	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 HOUSING
	Agency/Group/Organization Type	Housing Services - Housing Services-Children Services-Victims of Domestic Violence Services-homeless Services-Education Services-Employment Service-Fair Housing Services - Victims
	What section of the Plan was addressed by Consultation?	Homeless Needs - Chronically homeless Homelessness Needs - Veterans 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.

7	Agency/Group/Organization	HUMILITY OF MARY SHELTER, INC.
	Agency/Group/Organization Type	Housing Services - Housing Services-Persons with Disabilities Services-Persons with HIV/AIDS Services-homeless Services-Health Services-Education Services-Employment
	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 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	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.
9	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>

10	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-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 Anti-poverty Strategy

	<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 23 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>
11	<p>Agency/Group/Organization</p> <p>Agency/Group/Organization Type</p>	<p>Neighborhood Groups</p> <p>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 Neighborhood Organization</p>

	<p>What section of the Plan was addressed by Consultation?</p>	<p>Housing Need Assessment Non-Homeless Special Needs Market Analysis Economic Development Anti-poverty Strategy Neighborhood Infrastructure/Revitalization Needs</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>Local groups were invited to participate in the process. 62 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.</p>
12	<p>Agency/Group/Organization</p>	<p>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>

	What section of the Plan was addressed by Consultation?	Housing Need Assessment Public Housing Needs Market Analysis Economic Development Anti-poverty Strategy Lead-based Paint 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?	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. 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.
13	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 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 recipient of HOME funds and a CHDO, the City has an ongoing relationship with this agency throughout the year.
14	Agency/Group/Organization	Scott County Housing Council
	Agency/Group/Organization Type	<ul style="list-style-type: none"> 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 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 49 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

Outreach was done through direct contact and media releases. Attempts were made to consult all agency types and none were intentionally not consulted.

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	Quad City Shelter & Transitional Housing Council	Both have goals of preventing and addressing homelessness and unstable housing situations.

Table 3 – Other local / regional / federal planning efforts

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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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)
1	Public Meeting	Minorities Non-English Speaking - Specify other language: Oral interpretation offered for all Persons with disabilities Non-targeted/broad community Residents of Public and Assisted Housing	Four meetings were held at different locations around the City, including at a project based Section 8 building. All locations were handicapped accessible. Annual Action Plan 2018	Housing: Need for affordable housing and housing rehabilitation. More restrictions on landlords to reduce predatory behavior and out of town investors. Economic Development: Attract more businesses, especially to the downtown. A grocery store in the downtown area was repeatedly mentioned as an important need. Infrastructure: Improve safety, especially downtown. Wheelchair bound residents of public housing identified sidewalk condition and lack of consistent snow removal as an ongoing problem. Blighted houses and	All comments offered were included.	27

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)
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>Bon Profit Agencies/Service Providers</p>	<p>An online survey was distributed and 254 responses were received. The survey was available for 3 weeks and was distributed through a variety of paper and electronic methods.</p>	<p>The survey resulted in the top priorities being housing, economic development, infrastructure, and public services. The highest priority public services were housing, youth services, and homeless services.</p>	<p>All comments offered were accepted.</p>	

Table 4 – Citizen Participation Outreach

Expected Resources

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

Introduction

This section lists the federal funding sources estimated to be available during this plan year. The numbers below are estimates and are subject to change based on actual entitlement amount received from HUD and on the actual amount of program income received through the City's Housing Rehab and Economic Development revolving loan funds. Additionally, HUD has notified the City and the Iowa Finance Authority that program income on hand for the Neighborhood Stabilization Program will, at some point in the future, be transitioned into the CDBG program. The amount and timing of that transition is unknown at this time, and as a result no estimate is included below for the NSP program income.

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	1,200,000	500,000	1,216,180	2,916,180	1,500,000	Estimated entitlement for Year 44 is \$1.2 million. Estimated program income for year 44 is \$500,000. Estimated prior year resources includes \$1,216,180 in entitlement and \$0 in program income. Estimated amounts for Year 45 are \$1,000,000 in entitlement and \$500,000 in program income per year

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	361,892	200,000	1,395,351	1,957,243	500,000	Estimated entitlement for Year 44 is \$361,892. Estimated program income for year 44 is \$200,000. Estimated prior year resources includes \$433,618 EN, \$31,239 AD, and \$930,494 PI. Estimated amounts for Year 45 is \$300,000 in entitlement and \$200,000 in program income per year. 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 2017 into the 2018 plan year, and what is expected to be earned in the 2018 plan year.

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 recieved will be utilized to pursue the goals and projects outlined in this plan according to applicable regulations.

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: \$934,010 HOME: \$1,869,815	Rental units constructed: 3 Household Housing Unit Homeowner Housing Added: 2 Household Housing Unit Homeowner Housing Rehabilitated: 15 Household Housing Unit Direct Financial Assistance to Homebuyers: 17 Households Assisted
2	Economic Development	2015	2019	Non-Housing Community Development		Economic Development		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: \$300,000 HOME: \$0	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 300 Persons Assisted Buildings Demolished: 1 Buildings

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: \$220,000 HOME: \$0	Public service activities other than Low/Moderate Income Housing Benefit: 888 Persons Assisted Public service activities for Low/Moderate Income Housing Benefit: 645 Households Assisted Homeless Person Overnight Shelter: 216 Persons Assisted

Table 6 – Goals Summary

Goal Descriptions

1	Goal Name	Housing
	Goal Description	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. Funding allocated includes: CDBG and HOME entitlement/estimated program income for 2017 and prior years for both housing projects and program delivery staff and operations.
2	Goal Name	Economic Development
	Goal Description	Funds will be used support programs to retain existing businesses, to attract new businesses, and to assist small business clients. Funding allocated includes: CDBG entitlement/estimated program income for 2018 and prior years for both economic development projects and program delivery staff.

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, contracts have not yet been signed for any infrastructure projects, however, one project of approximately \$300,000 is anticipated. 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.

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 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 45% from the highest funding year, even while the need has stayed the same or grown. HOME funding has declined by 55% 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: \$264,845 HOME: \$87,428
	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. 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. 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 2017 entitlement and program income, as well as prior year entitlement and program income.
	Target Date	6/30/2019
	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 of the CDBG and HOME funded activities which are available citywide.
	Planned Activities	Coordinates, administers, and monitors the CDBG and HOME programs; prepares reports and plans required by HUD, prepares environmental and historic preservation 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. 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. Expected resources include 2017 entitlement and program income, as well as prior year entitlement and program income.
2	Project Name	Housing
	Target Area	
	Goals Supported	Housing
	Needs Addressed	Housing
	Funding	CDBG: \$934,010 HOME: \$1,869,815
	Description	With CDBG and HOME funding in accordance with rules and regulations, assistance will be provided by the City directly to homebuyers, homeowners 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. 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. Expected resources include 2018 entitlement and program income, as well as prior year entitlement and program income.
	Target Date	6/30/2019

	Estimate the number and type of families that will benefit from the proposed activities	<p>It is estimated that the following beneficiaries will be served:</p> <ul style="list-style-type: none"> • Rental Units added: 3 • Owner occupied housing rehabilitated: 15 • Homeowner housing added: 2 • Direct financial assistance: 17
	Location Description	<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 homeowners 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. May include: acquisition/rehab/resale, refinance/rehab, demolition/site preparation, new construction, downpayment/closing cost assistance and housing counseling. 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.</p>
3	Project Name	<p>Economic Development</p>
	Target Area	
	Goals Supported	<p>Economic Development</p>
	Needs Addressed	<p>Economic Development</p>
	Funding	<p>CDBG: \$1,197,325</p>

	Description	Formulation, coordination, and implementation of local economic development strategies. Provide economic development assistance including loans, section 108 loans, loan guarantees, grants, and infrastructure development to businesses locating to or expanding in Davenport. Loans and grants provided will be for operating capital, acquisition, rehabilitation, demolition, slum blight prevention/removal. At least 51% of the jobs created by the assisted businesses must be made available to low/moderate income people. Economic 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. A percentage of staff costs will be covered by program income earned through the revolving loan fund. Expected resources include 2018 entitlement and program income, as well as prior year entitlement and program income.
	Target Date	6/30/2019
	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	Formulation, coordination, and implementation of local economic development strategies. Provide economic development assistance including loans, section 108 loans, loan guarantees, grants, and infrastructure development to businesses locating to or expanding in Davenport. Loans and grants provided will be for operating capital, acquisition, rehabilitation, demolition, slum blight prevention/removal. At least 51% of the jobs created by the assisted businesses must be made available to low/moderate income people. Economic 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. A percentage of staff costs will be covered by program income earned through the revolving loan fund.
4	Project Name	Infrastructure and Area Benefits
	Target Area	
	Goals Supported	Infrastructure and Area Benefits
	Needs Addressed	Infrastructure and Area Benefits

	Funding	CDBG: \$300,000
	Description	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), removal of blight, improvements to streets, sidewalks, gutters, sewer, alleys, neighborhood improvements, etc. Funds not utilized in the Infrastructure and Area Benefit project will be utilized in the Housing project. Expected resources include 2018 entitlement and program income, as well as prior year entitlement and program income.
	Target Date	6/30/2019
	Estimate the number and type of families that will benefit from the proposed activities	<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, no contracts have been signed infrastructure projects. 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>
	Location Description	Infrastructure activities in support of affordable housing are available citywide.
	Planned Activities	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), removal of blight, improvements to streets, sidewalks, gutters, sewer, alleys, neighborhood improvements, etc.
5	Project Name	Low-Mod Clientele and Public Services
	Target Area	
	Goals Supported	Low-Mod Clientele and Public Services
	Needs Addressed	Low-Mod Clientele and Public Services
	Funding	CDBG: \$220,000

Description	<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. 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. 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. 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.Expected resources include 2018 entitlement and program income, as well as prior year entitlement and program income.</p>
Target Date	<p>6/30/2019</p>
Estimate the number and type of families that will benefit from the proposed activities	<p>This year, applicants for funds have indicated that 1,749 individuals will be served.</p>
Location Description	<p>Services for low and moderate income residents and public services are available citywide.</p>

<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. 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. 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 2018 entitlement and program income, as well as prior year entitlement and program income.</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 81% 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.

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	37
Special-Needs	0
Total	37

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	15
Acquisition of Existing Units	17
Total	37

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 OAH has made application for 2017 Public Housing Capital Fund Program funding from HUD for an amount of roughly \$55,000 (award based on available funds from HUD, to be awarded in or around August of 2017) for continued operation of existing scattered site public housing units. This will be the 25th amendment to our Capital Fund Program agreement with HUD. OAH's available units offer a wide range of housing options for families of different sizes and with different needs.

In FY2017, the City of Davenport also allocated sufficient Capital Improvement Project funding to replace the oldest and least efficient hot water heaters currently still in use in the 42 scattered site units. Replacements are underway and should complete by the end of Summer 2017.

Work is also being done to evaluate time and cost for replacement of the main electrical panels in all Heritage and Scattered-site units. The existing panels use push-button breakers which are difficult to maintain and replace and in many cases are as-built original equipment and are requiring more maintenance as they age. The work to replace these panels will likely take place in FY2018, as funds allow.

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

In 2016, the Davenport Housing Commission approved a resolution supporting the implementation of Local Preferences for Waiting List Selection for the Public Housing program. This allows OAH to prioritize allocation of housing assistance to those families that are Davenport residents and that are most in need. In January and February of 2016 an applicant update mailing was sent out to over 6,000 applicants and this local preference information was captured in the following months and in May of 2016 the waiting lists for the Section 8 and Public Housing programs were resorted and subsequent offers of assistance were made utilizing that local preference information, essentially prioritizing the available assistance funding for those most in need of assistance.

As a result of the subsidy and payment standard changes implemented for the Section 8 HCV program in 2015, OAH created the additional funding capacity to add an additional 300 families to the Section 8 HCV program in Davenport. Approximately 100 families were added during the first year of the implemented changes (August 2015 to August 2016). An additional 75 vouchers were given to families in the Fall of 2016 and during the Spring of 2017 another 100 vouchers were issued. Should all families with vouchers lease up on the program, OAH should reach maximum utilization of its HAP funding for rental assistance payments by the end of the 2017 calendar year.

Since OAH has processed and issued so many additional Section 8 vouchers, OAH has very nearly exhausted the waiting lists for both the Section 8 HCV and Scattered-site Public Housing programs. The Davenport Housing Commission has passed resolutions directing OAH to open the Section 8 HCV and

Scattered-site Public Housing programs to new applications from July 5, 2017 until July 31, 2017 which should provide an adequate pool of applicants for the coming year.

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 respond 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. OAH is investigating the possibility of offering a HUD-approved Family Self-Sufficiency program or Section 8 for Home-Ownership option.

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.

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 23 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 Quad City Shelter and Transitional Housing Council 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 in collaboration with Rock Island County in Illinois are creating a combined coordinated entry approach to serving individuals and families who are risk of becoming homeless.

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 has been in the process of creating an Assessment of Fair Housing (AFH) in a regional collaboration with the cities of Moline and Rock Island, Illinois as well as six local public housing authorities. 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 negotiating an amendment to the AFH contract that was already in place with an outside firm to make it compliant with the updated AI guidance in the HUD notice. Davenport will act as 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 is in the process of incorporating the January 5, 2018 guidance from HUD into the existing contract to produce an Assessment of Fair Housing (AFH). The contract will be amended to produce an updated Analysis of Impediments (AI) instead, per HUD's instruction. The updated AI will be used to inform future activities regarding fair housing.

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 45% from the highest funding year and HOME funding has declined by 55%, 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 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. 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.

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 72 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 ten agencies operating ten 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.

Program Specific Requirements

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

Introduction:

**Community Development Block Grant Program (CDBG)
Reference 24 CFR 91.220(I)(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.	90.00%

HOME Investment Partnership Program (HOME)
Reference 24 CFR 91.220(l)(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

Groups Invited to Participate

Quad City Shelter and Transitional Housing Council Membership List

Bethany for Children and Families
Bridging the Gap
Center for Alcohol and Drug Services
Center for Active Seniors
Community Health Care
Christian Care
City of Davenport
DeLaCerde House
Family Resources SafePath Survivor Resources
Goodwill of the Heartland
HELP Regional Office of Iowa Legal Aid
Humility of Mary Housing
Humility of Mary Shelter
One Eighty Zone
Project NOW
RHOH
Scott County Community Services
Scott County Housing Council
Supplemental Emergency Assistance Program
St. Joseph the Worker House
The Salvation Army
Unity House
Vera French

23 total groups

**Scott County Housing Cluster/
Scott County Housing Council
Membership List**

Ascentra Credit Union
BankORION
Bethany for Children and Families
Blackhawk Bank & Trust
Brain Injury Alliance of Iowa
Build to Suit, Inc.
CBI Bank and Trust
Christian Care
City of Bettendorf
City of Davenport
Community Action of Eastern Iowa
Community Foundation of the Great River Bend
DeLaCerde House
East Bluff Neighborhood Association
Ecumenical Housing Development Group
Family Resources
First Midwest Bank
Gateway Redevelopment Group
Great Southern Bank
Habitat for Humanity
Handicapped Development Center
Hilltop Campus Village, Corp.
Humility of Mary Housing, Inc.
Humility of Mary Shelter, Inc.
IH Mississippi Valley Credit Union
Illinois Iowa Center for Independent Living
Interfaith Housing Ltd
Modern Woodman Bank
Neighborhood Housing Service of Davenport
Project NOW
Quad City Bank and Trust/EHDG
Rebuilding Together Quad Cities
River Cities Development Services

Riverboat Development Authority
Rock Island Economic Growth
Rock Island Housing Authority
Salvation Army of the QC
Scott County Health Department
Scott County Planning and Zoning Department
Southeast National Bank
St. Joseph the Worker House
The Arc of the Quad Cities Area
United Neighbors, Inc.
United Way of the QC
US Bank
Vera French Housing, Corp
Vibrant Credit Union
Wells Fargo Bank
YouthBuild Quad Cities

49 total groups

Neighborhood Groups Contacted to Participate

Alley Cats
Be Nice to your Neighbor Neighborhood Watch
Blackhawk Square
Brady Street Bunch
Bridge to Ridge
Carriage Hill/Fernwood Neighborhood Watch
Cedar Hill Neighborhood Watch
Central Community Circle
Central Forest Neighborhood Watch
Colorado Street Neighborhood Watch
Duck Creek Corners Neighborhood
Eagle Eye Neighborhood Watch
East 18th Street Neighborhood Watch
East 33rd Street Neighborhood Watch
East Bluff Neighborhood Association
East Central Neighborhood Group
East Side Neighborhood Association
Eastern Avenue Farms
Fairview Neighborhood Watch
Fejevary Neighbors Neighborhood Watch Association
Friendship (Manor) Square Neighborhood Watch
Future Generations Neighborhood Watch
Garden Addition North Assoc
Garner Farms
Garner Farms Villa
Glen Armil Neighborhood Watch
Gold Coast & Hamburg Historic District Association
Goose Creek Heights Neighborhood Association
Green Acres
Hancock
Heatherton Neighborhood Watch
Highland Neighborhood Watch Group
Hill Top Neighborhood Watch
Historic Washington Street

Jersey Farms Neighborhood Association
Jersey Meadows
Kimberly Village Homes Assoc
Lincoln Neighbors
Lorton Meadows
Madison Circle Neighborhood Watch
Marycrest Neighborhood Watch
McClellan Heights Neighborhood Watch
Meadow Crest Neighborhood Watch
Neighbors of Prospect Park
North Nevada Neighborhood Watch
North Thornwood Neighborhood Watch
Northwest Rollers
Norwood Park Neighborhood Association
Oakbrook Commons
Oakbrook North
Perry Street Watch
Prospect Park Neighborhood Watch
Redwood Neighborhood Watch Group
Silver Creek Neighborhood Watch
South Vanderveer Neighborhood Association
Southwest Gateway
Vanderveer Historic Neighborhood Association
West 16th & 17th Neighborhood Watch
West 30th Neighborhood Watch
West 68th Street Neighborhood Watch
West Colorado Neighborhood Watch
West of West Neighborhood Watch
Windsor Crest Club, Inc.
Windsor Pine Neighborhood Watch

(64 total groups)

Summary of
Survey and Public Input Meeting Comments

Summary of Year 44 Public Input Meeting Themes

The Year 44 public input meetings were held in September, 2017:

- Wednesday, September 13th, 2017; 6:30pm Eastern Branch Library (Meeting Room B)
- Thursday, September 21st, 2017; 6:00pm Freight House (2nd Floor)

In addition to the public input meetings, two meetings were held to gather input for public and assisted housing residents:

- Thursday, September 21st, 2017; 10:00am Heritage Community Room
- Thursday, September 21st, 2017; 2:00pm Heritage Community Room

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 (79) was the most selected need overall, and was the most selected non-public service need, followed by infrastructure (55) and Economic Development (32). The most commonly selected public service need was assistance for the physically and mentally disabled (9), followed by a three way tie if Homeless Shelters, Transportation and Youth programs (at 4 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 44 public input survey

The housing breakdown of respondents:

Homeowners – 147 (57.8%)
Renter – 107 (42.1%)

The location breakdown of respondents:

52801 – 43 (16.9%)
52802 – 21 (8.2%)
52803 – 93 (36.6%)
52804 – 34 (13.3%)
52805 – 0 (0.0%)
52806 – 33 (12.9%)
52807 – 24 (9.4%)
52808 – 0 (0.0%)
52809 – 0 (0.0%)

Best way to improve neighborhoods:

Increasing Affordable Housing.....33%
Increasing Neighborhood Infrastructure, Quality, and Safety.....30%
Increasing Employment and Business Opportunities.....25%
Increasing Public Services to Low-Moderate Income Residents.....12%

Community priorities:

49% of survey respondents viewed affordable housing as being the highest priority service for community improvement, followed by services for youth at 39%, and assistance for the homeless at 29%.

23% of survey respondents view assistance for the homeless as the most important medium priority, followed by affordable housing and youth, tied at 18%.

Focusing funds:

80.6% of survey respondents are in favor of fund focusing, which is an increase of 18% from year 43.

The top three services respondents use are:

Davenport Parks – 151 (61%)

Family Resources – 41 (17%)

Humility of Mary – 38 (15%)

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

Vera French

NAMI

SAFER Foundation

AEA

Davenport Public Library

Dress for Success

City bike trails

Kings Harvest

The Center

CitiBus

Girl Scouts

The Project of the Quad Cities

YMCA

56 (23%) 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 63%, followed by area C at 26%.

The area considered most in need of employment and business improvements is again area D, at 66%, followed again by C at 16%.

The area considered most in need of neighborhood quality and safety improvements is again D at 61%, followed again by C at 26%.

The area considered most in need of an increase in low-mod public services is again D, at 60%, follow again by C at 26%.

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 walkability/bike-ability, 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.

Constant Contact Survey Results

Survey Name: City of Davenport Community Survey
Response Status: Partial & Complete
Filter: None
 Sep 25, 2017 1:15:32 PM

1. I am a:

	Number of Response(s)	Response Ratio
Homeowner	147	57.8%
Renter	107	42.1%
Total	254	100%

2. My zipcode is:

	Number of Response(s)	Response Ratio
52801	43	16.9%
52802	21	8.2%
52803	93	36.6%
52804	34	13.3%
52805	0	0.0%
52806	33	12.9%
52807	24	9.4%
52808	0	0.0%
52809	0	0.0%
Other	6	2.3%
Total	254	100%

3. How many youth under the age of 18 are currently living in your home?

	Number of Response(s)	Response Ratio
1-2	57	22.4%
3-5	20	7.8%
6-8	2	<1%
9 or more	0	0.0%
None	175	68.8%
Total	254	100%

4. Review the list of community needs below, and select one as a High Priority, one as a Medium Priority, and one as a Low Priority. Mark the other options as "N/A". When completed there should be only one check under Low, one check mark under Medium and one check under High (other 5 should be N/A).

Top number is the count of respondents selecting the option. Bottom % is percent of the total respondents selecting the option.

	Low Priority	Medium Priority	High Priority	N/A
Affordable Housing Options	25 10%	44 18%	122 49%	59 24%
Homeless/ Shelters	24 10%	58 23%	73 29%	95 38%
People with AIDS	42 17%	34 14%	26 10%	148 59%
People in need of Transportation	31	41	57	121

People in need of transportation	12%	16%	23%	48%
Physically and Mentally Handicapped Assistance	26	46	64	114
Seniors	10%	18%	26%	46%
Survivors of Domestic Violence/ Sexual Abuse	29	43	59	119
Youth	12%	17%	24%	48%
	25	42	70	113
	10%	17%	28%	45%
	22	46	98	84
	9%	18%	39%	34%

5. 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?

	Number of Response(s)	Response Ratio
Yes	204	80.6%
No	50	19.7%
Total	253	100%

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

Top number is the count of respondents selecting the option. Bottom % is percent of the total respondents selecting the option.	Best			
	1	2	3	4
Increasing Affordable Housing	82	65	54	51
	33%	26%	21%	20%
Increasing Employment and Business Opportunities	63	74	52	63
	25%	29%	21%	25%
Increasing Neighborhood Quality and Safety	76	66	74	36
	30%	26%	29%	14%
Increasing Public Services to Low-Moderate Income Residents	31	47	72	102
	12%	19%	29%	40%

7. Enter Question Text Here.

Top number is the count of respondents selecting the option. Bottom % is percent of the total respondents selecting the option.	A	B	C	D
Which area has the highest need for housing improvements	20	8	66	159
	8%	3%	26%	63%
Which area has the highest need for employment and business improvements	24	21	41	167
	9%	8%	16%	66%
Which area has the highest need for neighborhood quality and safety improvements	22	10	66	155
	9%	4%	26%	61%
Which area has the highest need for an increase in public services for low-moderate	18	18	65	152
	7%	7%	26%	60%

8. Please check all of the services that you currently use, please add any others in the comment box:

Top number is the count of respondents selecting the option. Bottom % is percent of the total respondents selecting the option.	Yes	No
Big Brothers Big Sisters	14	232
	6%	94%
Boys and Girls Club	12	234
	5%	95%
CAFCU	32	214

	13%	87%
City of Davenport Parks	151	95
	61%	39%
Family Resources	41	205
	17%	83%
Friendly House	30	216
	12%	88%
Humility of Mary Housing/ Humility of Mary Shelter	38	208
	15%	85%
Project Renewal	12	234
	5%	95%
United Neighbors	21	225
	9%	91%
I do not use any of the services listed	56	190
	23%	77%
67 Comment(s)		

9. Are there any additional services you would like to have provided that are not listed above? Please comment below:

73 Response(s)

HUD Guidance

Delayed Submission of Annual Action Plan

MEMORANDUM

DEPARTMENT OF COMMUNITY PLANNING AND ECONOMIC DEVELOPMENT

DATE: April 16, 2018

SUBJECT: YR44 funding recommendations and Annual Action Plan timeline

On March 5, the Citizens' Advisory Committee (CAC) met and recommended CDBG funding allocations for the program year beginning July 1, 2018. These allocations were the subject of a public hearing on March 21, 2018 and were approved by City Council on March 28, 2018.

As the City of Davenport went through the annual planning and allocation process, Congress had not yet appropriated funds for the CDBG or HOME programs. Because Congress had not appropriated funds, HUD had not yet allocated funds nor announced grant amounts for individual cities. Therefore, the YR44 allocations were based on an estimate of \$1.2 Million. If the actual allocation is within +/-15% of the estimated amounts, the CAC recommended and City Council approved that awards would be adjusted up or down across all funded activities to reflect the change. If the actual allocation was more than +/-15% different from the estimate, the CAC would meet to consider revised award recommendations.

In a typical year, the City would submit its Annual Action Plan to HUD by May 15. This year, that schedule has been delayed. Following HUD's guidance in CPD Notice 18-01 dated January 24, 2018, the City delayed submission of the Annual Plan for Year 44. The Annual Action Plan will be submitted to City Council for approval once actual allocation amounts are known. Because the date that an agreement for funding will be signed with HUD is not known, it may be necessary to cover pre-award costs as described in CPD Notice 18-01.

The City has 60 days from HUD's announcement of actual allocation amounts to complete and submit the Annual Action Plan. Per HUD guidance, Annual Action Plans must be submitted to HUD by August 16, 2018 at the latest.

Copies of the HUD guidance referenced here are included with this memo.



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-18-01

Issued: January 24, 2018
Expires: September 30, 2018

Cross Reference: 24 CFR Part 91

Subject: Guidance on Submitting Consolidated Plans and Annual Action Plans
for Fiscal Year (FY) 2018

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 2018 consolidated plans and action plans. 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' 3-5-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, 2017; and the latest submission deadline is August 16, 2018. However, in most years, HUD does not receive its annual funding appropriation until several months into the federal fiscal year (rarely earlier than December,

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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 2018, 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 2018.

Revised Procedures for Submission of FY 2018 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 2018 funding prior to computation of FY 2018 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 2018 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 FY2018 appropriation. At this time, HUD cannot predict when its FY 2018 appropriations bill will be enacted and when it will be able to announce FY 2018 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 2018 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 2018 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 2018 Action Plans for CDBG, ESG, HOME, HOPWA

Grantees are advised not to submit their consolidated plan/action plan until after the FY 2018 allocations have been announced. Grantees due to submit a new 3-5-year consolidated plan in FY 2018 should refrain from submitting the overall consolidated plan as well as the FY 2018 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 2018 funding allocation amounts, each grantee should, prior to submission, ensure that the actual FY 2018 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, 2018 (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 2018 allocation amounts to grantees on April 27, 2018:

- 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 26, 2018.
- 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 26, 2018.
- 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, 2018. Failure to submit an action plan for FY 2018 by August 16, 2018, will result in the automatic loss of FY 2018 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 2018 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 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. 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 2018. 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 are received by the field office, whichever is later. HUD will disapprove as substantially incomplete any consolidated plan or action plan covering FY 2018 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 2018 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 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 as “troubled” by HUD.

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 2018 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 2018 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 2018.
- 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 on grantees' part. 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.

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 2018 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 2018 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, 2018, as that is the last date that a grantee may submit its FY 2018 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 2018 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 2018 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, 2018, as that is the last date that a grantee may submit its FY 2018 action plan.

D. Additional Provisions: ESG Program

An ESG grantee is permitted to incur pre-award costs against its FY 2018 grant, provided that the grantee has met the general conditions described above, plus the following conditions:

1. The costs and corresponding activities must comply with the Emergency Solutions Grants (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 2018 grant, provided that the grantee has met the general conditions described 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. Applicability of This Notice to Future Years

This Notice only applies to consolidated plans/action plans submitted for FY 2018 funding on or before August 16, 2018, or 60 days after HUD announcement of the FY 2018 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 amounts. 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

ATTACHMENT A




ASSISTANT SECRETARY FOR
COMMUNITY PLANNING AND DEVELOPMENT

U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT
WASHINGTON, DC 20416-5000

DEL 12 2017

MEMORANDUM FOR: All Community Planning and Development Field Office
Division Directors

FROM: Neal Rackleff, 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 2018

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 2018. 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 2018 funding prior to the enactment of a FY 2018 appropriation bill. Grantees are advised to not submit a consolidated plan or action plan until the FY 2018 formula allocations have been announced. However, an action plan must be submitted to HUD no later than August 16, 2018.

The likelihood of delays in the receipt of annual appropriations by HUD and implementation of these procedures for FY 2018 may have negative consequences for CDBG and HOME grantees that intend to incur eligible costs prior to the award of FY 2018 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.

NOTIFICATION PROCESS:

This waiver will apply to any Entitlement, Insular or Hawaii nonentitlement CDBG grantee and to any HOME participating jurisdiction whose program year start date for FY 2018 funding occurs during the period starting October 1, 2017, and ending August 16, 2018 or 60 days after HUD announcement of FY 2018 allocation amounts for formula program funding (whichever comes first). This waiver is available for use by any applicable CDBG grantee or HOME participating jurisdiction whose action plan submission is delayed past the normal submission date because of delayed enactment of FY 2018 appropriations for the Department.

www.hud.gov osp@ol.hud.gov

Any affected grantee taking advantage of this waiver shall document in writing the conditions giving rise to the need to use this waiver, and shall maintain such documentation for HUD's review. This waiver authority is only in effect until August 16, 2018.

WAIVER AUTHORITY:

Without this waiver, some activities might be interrupted while implementing these procedures. In addition, grantees might not otherwise be able to use CDBG and HOME funds for ongoing planning and administrative costs of administering their programs. To address communities' needs and to ensure that programs can continue without disturbance, I find that good cause exists pursuant to 24 CFR 5.110 to waive the CPD program regulatory requirements set forth below.

WAIVER AVAILABILITY:

I. Pre-award Costs

Requirement: The effective date of the grant agreement is the program year start date or the date that the consolidated plan is received by HUD. These dates determine when a grantee may incur pre-award costs.

Citations: 24 CFR 570.200(h) (Entitlement CDBG program, the Insular Areas CDBG program, and for grants to nonentitlement counties in Hawaii) and 24 CFR 92.212(b) (HOME participating jurisdictions)

Explanation: This waiver will allow a grantee or participating jurisdiction to treat the effective date of the grant agreement as the program year start date or the date that the consolidated plan/action plan (with actual allocation amounts) is received by HUD, whichever is *earlier*.

Justification: HUD recognizes that some activities may be interrupted, and grantees might not otherwise be able to use CDBG and HOME funds for ongoing planning and administrative costs.

Applicability: This authority is in effect until August 16, 2018.

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.

Draft Citizen Participation Plan

Citizen Participation Plan

Draft Revision

Citizen Participation Plan





Citizen Participation Plan

Contents

Important Note On Assessment of Fair Housing Requirements.....	3
Citizen Participation Plan	4
Encouragement of Participation & Consultation	4
Consultation	4
Homeless Strategy	4
Lead Based Paint	5
Non-Housing Community Development.....	5
Affirmatively Furthering Fair Housing.....	5
Public Housing.....	5
Access for Persons with Disabilities	6
Assessing Language Needs.....	6
Technical Assistance	6
Availability to the Public	7
Proposed Documents.....	7
Approved/Accepted Documents.....	7
Public Notices, Comment Periods, and Hearings.....	8
Data	8
Public Notices.....	8
Public Meetings.....	8
Public Hearings.....	8
Summary of Notice, Comment and Hearing Timelines.....	9
Comments	10
Complaints	10
Amendments and Revisions.....	10
Citizen Participation Plan	10
Consolidated Plan	10
Assessment of Fair Housing	11
Performance Reports.....	11
Anti-displacement.....	11
Disaster Response and Recovery	12
Waivers	12

Important Note On Assessment of Fair Housing Requirements

On July 16, 2015 HUD issued the Affirmatively Furthering Fair Housing Rule, which directed cities receiving federal CDBG and HOME grants to develop a document called the Assessment of Fair Housing as a replacement to a previously required document called the Analysis of Impediments to Fair housing. This document was to be due 9 months before the submission of the next Five Year Consolidated Plan. The deadline for Davenport was to have been October 2019.

On March 14, 2016, HUD issued a memo providing guidance on specific requirements of public input and consultation for the Affirmatively Furthering Fair Housing Rule that were required to be incorporated in the required Citizen Participation Plan for cities receiving federal CDBG and HOME grants.

On July 26, 2017 the Davenport City Council approved a revised Citizen Participation Plan that incorporated the HUD required provisions in preparation for the newly required Assessment of Fair Housing.

On January 5, 2018 HUD published a notice in the Federal Register extending the deadline for submitting the Assessment of Fair Housing to 9 months before the due date of the next Five Year Consolidated Plan due after October 31, 2020. This means the deadline for Davenport has been extended to October 2024. The notice directed cities to stop preparing and submitting Assessments of Fair Housing and instead prepare the previously required Analysis of Impediment to Fair Housing, which has its own standards for public input and consultation.

At the time that HUD issued notice the deadline had been extended, the City of Davenport had already incorporated language into the Citizen Participation Plan that referenced the Assessment of Fair Housing. That language remains in the Citizen Participation Plan. When the planning process begins for the Assessment of Fair Housing, now scheduled for 2023 per HUD, the sections of the Citizen Participation Plan pertaining to the Assessment of Fair Housing will become effective. Residents continue to be able to participate in the consolidated planning process for CDBG and HOME as described in this Citizen Participation Plan.

Citizen Participation Plan

The City is required to adopt and follow a Citizen Participation Plan (CPP) that sets forth the policies and procedures for citizen participation and consultation in the development, revision, implementation and amendment of the Consolidated Plan (ConPlan) and Annual Action Plans (AAP), the Assessment of Fair Housing (AFH), and the Consolidated Annual Performance and Evaluation Report (CAPER).

Encouragement of Participation & Consultation

The Citizen Participation Plan is designed to encourage participation of all residents and stakeholders, especially:

- low- and moderate-income persons,
- public/assisted housing residents, including their resident boards/councils/corporations
- minorities,
- non-English speakers,
- persons with disabilities,
- residents of predominantly low- and moderate-income neighborhoods,
- residents of designated revitalization and/or slum/blighted areas,
- residents of areas where CDBG funds are proposed to be used
- local and regional institutions,
- Continuums of Care,
- Businesses and developers;
- Public, private and nonprofit organizations, including philanthropic, community-based and faith-based organizations.

Consultation

When preparing both the AFH and the ConPlan, the City will invite other public and private agencies to consult in the preparation of these documents. These invitations will include agencies that provide:

- public and assisted housing
- health services
- social services (including those focusing on services to children, elderly persons, persons with disabilities, persons with HIV/AIDS and their families, homeless persons)
- community-based and regionally-based organizations that represent protected class members
- organizations that enforce fair housing laws
- other local governments and metropolitan planning organizations
- broadband internet service providers and organizations engaged in narrowing the digital divide,
- agencies whose primary responsibilities include the management of flood prone areas, public land/water resources, and emergency management agencies

Regulations require that specific areas be addressed in the overall consultation process. These include:

Homeless Strategy

When preparing the portions of the ConPlan describing homeless strategy and the resources available to address the needs of homeless persons (particularly chronically homeless individuals and families, families with

children, veterans and their families, and unaccompanied youth) and persons at risk of homelessness, the City will invite the following entities to consult:

- The Continuum of Care that serves the City
- Public and private agencies that address housing, health, social service, victim services, employment, or education needs of low-income individuals and families; homeless individuals and families, including homeless veterans; youth; and/or other persons with special needs
- Publicly funded institutions and systems of care that may discharge persons into homelessness (such as health-care facilities, mental health facilities, foster care and other youth facilities, and corrections programs and institutions)
- Business and civic leaders.

Lead Based Paint

When preparing the portion of the ConPlan concerning lead-based paint hazards, the City will invite state or local health and child welfare agencies to consult and examine existing data related to lead-based paint hazards and poisonings, including health department data on the addresses of housing units in which children have been identified as lead poisoned.

Non-Housing Community Development

When preparing the description of priority non-housing community development needs in the ConPlan, the City will notify adjacent units of general local government, to the extent practicable. The State and County will also be notified when the ConPlan is available online for public comment.

Affirmatively Furthering Fair Housing

When preparing the portion of the ConPlan concerning Affirmatively Furthering Fair Housing, and the AFH, the City will invite the types of organizations described below to consult. These invitations to consult will be extended to any organizations that are known to have relevant knowledge or data to inform the AFH and that are known to be sufficiently independent and representative to provide meaningful feedback to the City on the AFH, the ConPlan, and their implementation. Consultation on the ConPlan will specifically seek input into how the goals identified in an accepted AFH inform the priorities and objectives of the ConPlan.

- community-based and regionally-based organizations that represent protected class members
- organizations that enforce fair housing laws, such as State or local fair housing enforcement agencies (including participants in the Fair Housing Assistance Program (FHAP))
- fair housing organizations and other nonprofit organizations that receive funding under the Fair Housing Initiative Program (FHIP)
- other public and private fair housing service agencies, to the extent that such entities operate within the City.

Public Housing

The City will invite the Public Housing Authority operating in Davenport to consult on consideration of public housing needs, planned programs and activities, the AFH, strategies for affirmatively furthering fair housing, and proposed actions to affirmatively further fair housing in the ConPlan. (See also 24 CFR 5.158 for coordination when preparing an AFH jointly with a PHA.)

Access for Persons with Disabilities

Access will be provided at all stages of the ConPlan and AFH process to those with disabilities. Access includes:

- All public meetings will be held in accessible locations
- All public hearings will be held in accessible locations
- Written documents, including the Citizen Participation Plan, proposed and adopted ConPlans, AAPs, proposed and accepted AFH, the CAPER, as well as any amendments or revisions to these documents will be made available in a form accessible to persons with disabilities upon request

Those in need of accommodations at public meetings, public hearings or to request documents in an accessible format should contact Community Planning and Economic Development at 326-7765 or TTY 326-6145, 226 W. 4th Street, Davenport, IA, 52801.

Assessing Language Needs

The City of Davenport's Community Planning and Economic Development Department has in place a Language Assistance Plan. This plan is consistent with the Department of Housing and Urban Development's Final Guidance to Federal Financial Assistance Recipients Regarding title VI Prohibition Against National Origin Discrimination Affecting Limited English Proficient persons. It is also consistent with Executive Order 13166 and Title VI of the Civil Rights Act of 1964. The plan is based on American Community Survey data and takes into account HUD's Four Factor Analysis to assist in identifying Limited English Proficiency (LEP) persons. CPED will use HUD's Safe Harbor guidance when deciding which languages will be translated into vital documents. These Safe Harbors apply only to Translation. Interpretation services will be provided to clients of all language groups, regardless of the size of the language group.

Census data indicates that approximately 2.5% of city residents speak another language and speak English less than "very well". Of the portion of the population that speaks English less than very well, Spanish is the most common language. Per the Language Assistance Plan, CPED will consider written translations of documents when an LEP group constitutes 5% of the population. No group meets that threshold. However, CPED will use a language identification card for clients to request oral interpretation in their own language, and statements in English and Spanish will be included in public meeting event notices, public documents and brochures that oral interpretation is available upon request.

Technical Assistance

The City will provide technical assistance to groups representative of persons of low and moderate income that request assistance in commenting on the proposed Plan and AFH, and in developing proposals for funding assistance under the Plan. Technical assistance does not include the provision of funds to the groups. Technical assistance provided may include, but not limited to:

- Providing information related to housing and community development;
- Responding to citizens' inquiries regarding the Plan and the programs it covers;
- Responding to citizens' inquiries regarding the AFH;
- Making referrals to other local, state, and federal agencies when necessary; and
- Responding to requests for assistance in developing proposals for funding.

Availability to the Public

There are two types of documents available to the public, each with their own timeframes and requirements: Proposed Documents and Approved/Accepted Documents. The documents will be available to the public in one or more of the following ways:

- from 8:00 a.m. to 5:00 p.m., Monday through Friday (except for City holidays), at City Hall, Community Planning and Economic Development Department
- online at www.cityofdavenportiowa.com
- at the Main and Branch locations of the Davenport Public Library during the regular business hours of each location, which are subject to change.
- A reasonable number of free paper copies of the Plan and the AFH will be available upon request.
- Available to those with disabilities in accessible formats upon request.
- Oral interpretation available upon request to Limited English Proficiency residents.

Proposed Documents

The City will provide residents, public agencies, and other interested parties with reasonable opportunities to examine the contents of and submit comments on the below listed documents. Proposed documents are available during their respective comment periods and upon adoption and/or acceptance by HUD the final versions will be retained on file. During the comment periods listed on page 8, the following proposed documents will be available:

- proposed Citizen Participation Plan
- proposed Consolidated Plan
- proposed Consolidated Plan substantial amendments
- proposed Annual Action Plans
- proposed Assessment of Fair Housing
- proposed Assessment of Fair Housing revisions
- proposed CAPER

Approved/Accepted Documents

The City will provide residents, public agencies, and other interested parties with reasonable and timely access to records for the preceding five years. The documents available include:

- Citizen Participation Plan as adopted,
- Consolidated Plan as adopted,
- Consolidated Plan substantial amendments,
- Annual Action Plans as adopted,
- HUD-accepted AFH,
- revisions to the AFH accepted by HUD, and
- CAPER accepted by HUD

Public Notices, Comment Periods, and Hearings

The public will be notified of the availability of documents and opportunity to comment at several stages in the Plan, AFH and CAPER process as described in this section.

Data

At or as soon as feasible after the start of the public participation process for the AFH, the City will make the HUD-provided data and any other supplemental information the City plans to incorporate into the AFH available to residents, public agencies, and other interested parties. The data will be made available on the City's website; HUD provided data will be made available by cross-referencing to the data on HUD's Web site.

Public Notices

Upon publication of the CPP, the Plan, AAPs, the AFH, the CAPER and any substantial amendments or revisions to these documents, a public notice with a summary of the proposed document will be published in the Quad-City Times or other local newspaper. The summary will describe the contents and purpose of the document, the duration of the public comment period, and a list of the locations where the entire document may be examined. For the Plan, the notice will also include the amount of assistance the City expects to receive; the range of activities that may be undertaken; and the estimated amount that will benefit low and moderate income persons. Comments for each proposed document will be accepted according to the timeframes described on page 8.

Public Meetings

At least two public community meetings will be held annually. Notifications of these meetings are accomplished by methods designed to inform the community as a whole with emphasis on notifying interested organizations and persons. Notice of the time, date, locations, and purpose of the meetings are publicized in the Quad-City Times or other local newspaper. Additional effort is made through notices on the City's website, Facebook, Twitter and NextDoor accounts, email and print notices to CDBG subrecipients and public housing/assisted housing residents served through the Office of Assisted Housing, and notices to neighborhood groups, nonprofits, and other organizations to encourage and emphasize the involvement of low and moderate income residents. Meetings may be held at various Davenport locations and City Hall to provide convenient and timely access to all citizens. All locations will be accessible to those with disabilities.

Public Hearings

Public hearings will be held to obtain views and respond to proposals/comments of citizens, public agencies, potential/actual beneficiaries and other interested parties. Public hearings will be held for proposed documents including the Citizen Participation Plan, the Plan, AAPs, the AFH, the CAPER and any substantial amendments or revisions to these documents. Notice of public hearings, including the time, place, and purpose of the meeting will be published in the Quad-City Times or other local newspaper according to the timeline described in State law. Public hearings are held in the Council Chambers, City Hall at 5:30 p.m. before the Davenport City Council Committee of the Whole during regularly scheduled Committee meetings which are televised on the City's public access channel and are also available for playback on the City's website at www.cityofdavenportiowa.com.

Summary of Notice, Comment and Hearing Timelines

	Public Notice	Comment Period (HUD may alter)	Public Hearing
Citizen Participation Plan	Upon Publication, will contain summary of the contents, purpose, duration of public comment period, list of locations where document is available.	30 Calendar Days prior to submission of the Consolidated Plan to HUD	In conjunction with public hearing for Consolidated Plan, publish notice online/in QCTimes.
CPP Amendments	Upon Publication, will contain summary of the contents, purpose, duration of public comment period, list of locations where document is available.	30 Calendar Days prior to implementation of the substantial amendment	Prior to implementing the substantial amendment, may be held in conjunction with public hearings for Annual Action Plan. Publish notice online/in QCTimes.
Consolidated Plan/ Annual Action Plan	Upon Publication, will contain summary of the contents, purpose, duration of public comment period, list of locations where document is available. Will also include the amount of assistance expected, range of activities undertaken, estimated amount that will benefit low/mod residents.	30 Calendar Days prior to submission of the Plan to HUD	<ul style="list-style-type: none"> • During the planning process to receive comments on the housing and community development needs identified at community meetings • During the development of proposed activities • Publish notice online/in QCTimes.
Plan Amendments	Upon Publication, will contain summary of the contents, purpose, duration of public comment period, list of locations where document is available.	30 Calendar Days prior to implementation of the substantial amendment	Prior to implementing the substantial amendment, may be held in conjunction with public hearings for Annual Action Plan. Publish notice online/in QCTimes.
Assessment of Fair Housing	Upon Publication, will contain summary of the contents, purpose, duration of public comment period, list of locations where document is available.	30 Calendar Days prior to submission of the AFH to HUD	Prior to submission to HUD. Publish notice online/in QCTimes.
AFH Data	At or as soon as possible after the start of the public participation process, data will be made available on the City's website by linking to HUD's website.		
AFH Revisions	Upon Publication, will contain summary of the contents, purpose, duration of public comment period, list of locations where document is available.	30 Calendar Days prior to submission of the revision to HUD	Prior to submission to HUD. Publish notice online/in QCTimes.
CAPER	Upon Publication, will contain summary of the contents, purpose, duration of public comment period, list of locations where document is available.	15 Calendar Days prior to submission of the CAPER to HUD	Prior to submission to HUD. Publish notice online/in QCTimes.

Comments

Proposed documents are published according to the Publication and Availability to the Public section on page 6. The City will receive comments from citizens according to the timelines listed on page 8.

The City will consider comments or views of residents of the community received in writing, or orally at the public hearings. Residents may submit written comments to:

Department of Community Planning and Economic Development
City of Davenport
226 W. 4th Street
Davenport, IA 52801

A summary of comments or views received, and a summary of any comments or views not accepted and the City's response, will be attached to the submitted document(s).

Complaints

The City will provide written responses to written complaints from its residents related to the Plan and any amendments, AAPs, the AFH and any revisions and the CAPER within 15 work days of receipt, where practicable.

Amendments and Revisions

Changes to the Consolidated Plan are called amendments; changes to the AFH are called revisions. When certain changes are required to these documents, a public participation process is required. This process may include a public notice, comment period, and/or a public hearing as described on page 9.

Citizen Participation Plan

The Citizen Participation Plan may need to be amended. A substantial amendment to the Citizen Participation Plan consists of:

- the addition to or removal of any proposed document to the public hearing or comment requirements of the plan
- a change in duration of any of the comment periods described in the Citizen Participation Plan, unless the comment period is altered at the direction of HUD

Upon completion of the public participation process, the amended Citizen Participation Plan will be made available to the public as described in the table on page 8.

Consolidated Plan

The projects presented in the Consolidated Plan may need to be amended. Amendments may be necessary if there is a change in allocation priorities, the method of distributing funds, the purpose/ scope/location/beneficiaries of an activity, or to carry out projects not previously described in the plan. Any amendments to the Consolidated Plan must be consistent with the City's certification to affirmatively further fair housing and the analysis and strategies of the AFH.

A substantial amendment consists of:

- Changes in the use of funds from one eligible project to another that exceed \$100,000;
- Carrying out a new CDBG eligible project in an amount greater than \$100,000;

Upon completion of the public participation process described in the table on page 8, HUD will be notified of the substantial amendment. Amendments may be submitted as they occur or at the end of the program year. Letters transmitting the amendment(s) to HUD will be signed by an authorized City official.

Assessment of Fair Housing

An AFH previously accepted by HUD must be revised and submitted to HUD for review under the following circumstances:

- A material change occurs that affects the information on which the AFH is based to the extent that the analysis, the fair housing contributing factors, or the priorities and goals of the AFH no longer reflect actual circumstances. In the event of a material change, a revision will be submitted to HUD within 12 months of the onset of the material change or as specified by HUD. Material changes include:
 - significant demographic changes;
 - new significant contributing factors in the participant's jurisdiction;
 - civil rights findings, determinations, settlements (including Voluntary Compliance Agreements), or court orders impacting the AFH;
 - Presidentially declared disaster that is of such a nature as to significantly impact the steps needed to affirmatively further fair housing. In this case, revision is to be made within 2 years of the disaster declaration or as specified by HUD.
- Upon HUD's written notification specifying a material change that requires the revision. In this case, revision is to be made according to the dates specified by HUD.
 - The City has 30 calendar days following the date of HUD's written notification to advise HUD in writing of its belief that a revision to the AFH is not required, stating specifically the reason(s) for that belief. HUD then has 30 calendar days following the date of the receipt of the City's notification to advise the City in writing whether HUD agrees or disagrees. If HUD disagrees, the City must proceed with the revision. HUD may establish a new due date that is later than the date specified in its original notification.

A revision consists of preparing and submitting amended analyses, assessments, priorities, and goals that take into account the material change, including any new fair housing issues and contributing factors that may arise as a result of the material change. A revision may not necessarily require the submission of an entirely new AFH. The revision need only focus on the material change and appropriate adjustments to the analyses, assessments, priorities, or goals. Upon completion of the public participation process, any revision to the AFH must be made public and submitted to HUD at the time of the revision.

Performance Reports

The City prepares an annual report called the Consolidated Annual Performance Evaluation Report (CAPER). The CAPER requires a public participation process. This process includes a public notice, comment period and public hearing as described on page 8. Upon completion of the public participation process, the CAPER will be submitted to HUD.

Anti-displacement

For federally funded activities, the City will attempt to avoid any displacement. In the event that the City undertakes an activity with federal funding that would involve displacement, the City will follow the procedures as identified within the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended.

Disaster Response and Recovery

On June 1, 2017, HUD issued CPD Notice 17-06, titled *Using CPD funds for Disaster Response and Recovery*. This notice directs entitlement communities to be prepared to respond quickly to a disaster by ensuring that the possible use of federal funding for disaster response is included in the Citizen Participation Plan, the Consolidated Plan, and the Annual Action Plan.

In the event of a presidentially declared disaster, any HOME or CDBG funds reallocated to address the disaster will be considered non-substantial amendments up to the threshold of \$300,000.

Waivers

All of the requirements in the Citizen Participation Plan are subject to change in the event of guidance or waivers issued by HUD. In the event that HUD issues guidance or waivers that affect citizen participation in the planning process City Staff will attempt to provide as much notice as is possible while still complying with the guidance or waiver received from HUD.