

CITY OF ALEXANDRIA

Consolidated Annual Performance *And Evaluation Report*

CAPER PY 2023-2023 (DRAFT)



Prepared for Submission to the U.S. Dept. of HUD
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Contents

| | |
|--|----|
| CR-05 - Goals and Outcomes..... | 3 |
| CR-10 - Racial and Ethnic composition of families assisted | 8 |
| CR-15 - Resources and Investments 91.520(a)..... | 9 |
| CR-20 - Affordable Housing 91.520(b) | 14 |
| CR-25 - Homeless and Other Special Needs 91.220(d, e); 91.320(d, e); 91.520(c) | 16 |
| CR-30 - Public Housing 91.220(h); 91.320(j) | 19 |
| CR-35 - Other Actions 91.220(j)-(k); 91.320(i)-(j) | 20 |
| CR-40 - Monitoring 91.220 and 91.230 | 24 |
| CR-45 - CDBG 91.520(c) | 26 |
| CR-50 - HOME 91.520(d)..... | 27 |
| CR-58 – Section 3..... | 29 |
| ATTACHMENTS..... | 30 |
| Attachment A – Citizen Participation Documentation | 31 |
| Attachment B – Accomplishments | 32 |
| Attachment C – Monitoring Addresses..... | 33 |
| Attachment D – IDIS Reports | 34 |
| CDBG Financial Summary Reports..... | 34 |
| CAPER IDIS Reports..... | 35 |

CR-05 - Goals and Outcomes

Progress the jurisdiction has made in carrying out its strategic plan and its action plan.
91.520(a)

This could be an overview that includes major initiatives and highlights that were proposed and executed throughout the program year.

Goal 1A: Provide for Owner-Occupied Rehab

2022 Progress:

CmDv collected **XX** applications for housing rehab assistance in FY2022-2023. Under the Minor Rehabilitation Program, **XX** units received CDBG-CV assistance during the program year. (*Attachment B-1*).

Under the CDBG Lead Remediation Program, CmDv continued collection applications, testing and evaluating properties. There was lots of staff turnover and lots of back and forth with HUD oversight on this program so we have not started remediation on any of the houses qualified to receive work yet. However, **XX** applications have been received and **XX** units are awaiting award.

Goal 1B: Increase Affordable Housing Opportunities

Developers resisted participation in the program, citing an unstable economy, high building materials costs, no one wanting to work and the risk of potentially turning housing development projects into rental, in the event the house did not sell within nine (9) months of construction completion, as required by HUD regulations. After 2.5 years of outreach, the City did finally find one Developer who was able to secure the PRIME 2 NOFA award for a 64 unit, fortified gold, multi-family rental development. The Five Year Consolidated Plan (5YCP) was amended to clarify rental in lieu of owner occupied. The City will be signing contracts in summer of 2023 and expect to start construction by early 2024.

The City also amended the 5YCP to replace CDBG & HOME Homebuyer Assistance Program (HAP) and CDBG Credit Counseling for CDBG Minor Rehab. The City received **XX** applications and will be starting construction in summer of 2023.

The City managed and performed **XXX** Code Enforcement inspections. (*Attachment B-2*). Of those complaints, **XX** properties were demolished by their owners using personal funds.

Goal 2: Address Slum and Blight

The City added General Fund money to demolish **XX** units to try to decrease the number of abandoned, vacant, dilapidated structures in the City. The City also used CDBG money to fund program delivery expenses for the demolition activity.

The City is also working to understand the root of blight and abandonment so that we can design programs and activities to arrest the annual volume of vacant, dilapidated structures.

Goal 3: Provide Emergency Assistance

The City provided Emergency Rental Assistance to 85 households. Following that assistance, the City modified its objectives for this Goal. CDBG CV: Funds were shifted from Emergency Assistance to Housing Rehabilitation to better serve the needs of the community.

Comparison of the proposed versus actual outcomes for each outcome measure submitted with the consolidated plan and explain, if applicable, why progress was not made toward meeting goals and objectives. 91.520(g)

Categories, priority levels, funding sources and amounts, outcomes/objectives, goal outcome indicators, units of measure, targets, actual outcomes/outputs, and percentage completed for each of the grantee's program year goals.

| Goal | Category | Source / Amount | Indicator | Unit of Measure | Expected – Strategic Plan | Actual – Strategic Plan | Percent Complete | Expected – Program Year | Actual – Program Year | Percent Complete |
|--|--------------------|------------------------------|---------------------------------|------------------------|---------------------------|-------------------------|------------------|-------------------------|-----------------------|------------------|
| 1A. Provide for Owner Occupied Housing Rehab | Affordable Housing | CDBG: \$ / CDBG-CV 1 & 3: \$ | Homeowner Housing Added | Household Housing Unit | 0 | 0 | | X | 0 | 0.00% |
| 1A. Provide for Owner Occupied Housing Rehab | Affordable Housing | CDBG: \$ / CDBG-CV 1 & 3: \$ | Homeowner Housing Rehabilitated | Household Housing Unit | XX | XX | XX | XX | XX | XX% |

| | | | | | | | | | | |
|---|-------------------------------|--------------------------------------|---|----------------------------------|----|----|-----------|----|----|-----------|
| 1B. Increase Affordab le Housing Opportu nities | Afford able Housi ng | CDB G: \$ / HO ME: \$ | Public service activities for Low/Moderate Income Housing Benefit | House old Assiste d | 0 | 0 | | X | 0 | 0.00 % |
| 1B. Increase Affordab le Housing Opportu nities | Afford able Housi ng | CDB G: \$ / HO ME: \$ | Homeowner Housing Added | House old Housin g Unit | X | 0 | 0.00 % | X | 0 | 0.00 % |
| 1B. Increase Affordab le Housing Opportu nities | Afford able Housi ng | CDB G: \$ / HO ME: \$ | Direct Financial Assistance to Homebuyers | House old Assiste d | X | 0 | 0.00 % | X | 0 | 0.00 % |
| 1B. Increase Affordab le Housing Opportu nities | Afford able Housi ng | CDB G: \$ / HO ME: \$ | Housing Code Enforcement/F oreclosed Property Care | House old Housin g Unit | XX | XX | XX | XX | XX | X% |
| 2. Address Slum & Blight | Afford able Housi ng | CDB G: \$ | Buildings Demolished | Buildin gs | XX | XX | XX | XX | XX | X% |
| 2. Address Slum & Blight | Afford able Housi ng | CDB G: \$ | Housing Code Enforcement/F oreclosed Property Care | House old Housin g Unit | XX | XX | XX | XX | XX | X% |

| | | | | | | | | | | |
|--|--------------------------------------|-----------------------------|---|-------------------------|----|----|----|----|----|----|
| 3. Provide Emergency Assistance | Non- Homeless Special Needs | CDBG- CV 1 & 3: \$ | Public service activities other than Low/Moderate Income Housing Benefit | Person s Assisted | XX | XX | XX | XX | XX | X% |
|--|--------------------------------------|-----------------------------|---|-------------------------|----|----|----|----|----|----|

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

Assess how the jurisdiction’s use of funds, particularly CDBG, addresses the priorities and specific objectives identified in the plan, giving special attention to the highest priority activities identified.

The City’s priorities can be organized into the two categories listed below.

1. Occupied housing related priorities

Rehabilitation and deferred maintenance repairs has been a prioritized activity for CDBG funds for several consecutive years now. Through those programs, the City found that a significant portion of that housing inventory had environmental concerns that prevented or limited the amount of HUD investment that could be made. For example: houses were in the floodplain, were in locations that had significant drainage issues that caused localized flooding, they tested positive for lead hazards with evidence of mold, and did not meet the definition for safe, decent affordable housing because it lacked the necessary facilities. XX Code Enforcement investigations were made on vacant, abandoned structures. The intent is to alert owners of deficiencies so the properties can be brought up to code and back into commerce.

2022: The City planned to build new affordable owner-occupied housing, however, due to lack of participation, in FY2023 the City will reprogram the money for renter-occupied affordable housing. This was paired with CDBG funds to provide lead remediation measures for those income qualified households to remove the hazard for safe occupancy of children under the age of six (6). The City will also move CDBG HAP and Credit Counseling funds to Minor Rehab to extend the useful life of owner-occupied housing.

2. Non-occupied housing priorities

Elimination of blighted properties is the most pressing community need based on input from residents, the consultation process, and discussions with City staff. The defined Revitalization Target Neighborhood areas make up over 50% of the City and are subject to: chronic high vacancy rates in both commercial and residential structures, structure deterioration, abnormally low property values with over 25% of those homes values at 50% less than the Citywide median home value. The demand for abatement of blight far exceeds the available financing to provide those services. That number

continues to change annually as older unit fall further into disrepair due to the various economic challenges faced in this area.

2022: The City completed XX blighted property demolitions within the Target Areas with City general funds and used CDBG funds for program delivery costs. The City will continue to fund this program in the following years and will work to identify reuse of the resulting vacant lots to alleviate the ongoing maintenance of the abandonment and absent owners.

Funds made available from the CARES Act 1 and 3 enabled the City to make minor rehabs to owner occupied homes that were in need of roof replacement.

CR-10 - Racial and Ethnic composition of families assisted

Describe the families assisted (including the racial and ethnic status of families assisted).
91.520(a)

| | CDBG | HOME |
|---|------|------|
| White | 0 | 0 |
| Black or African American | XX | 0 |
| Asian | 0 | 0 |
| American Indian or American Native | 0 | 0 |
| Native Hawaiian or Other Pacific Islander | 0 | 0 |
| Total | XX | 0 |
| Hispanic | 0 | 0 |
| Not Hispanic | XX | 0 |

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

Narrative

The table above represents the race and ethnicity of households that received a direct benefit.

The City also carried out removal of blight activities during the 2022 Program Year in our target areas. Target area activities do not require that jurisdictions report race and ethnicity of individuals living in these target areas nor annual income of households. However, target areas do require a low-income population of more than 51% of total residents.

CR-15 - Resources and Investments 91.520(a)

Identify the resources made available

| Source of Funds | Source | Resources Made Available | Amount Expended During Program Year |
|-----------------|------------------|--------------------------|-------------------------------------|
| CDBG | public - federal | XX | XX |
| HOME | public - federal | XX | XX |
| Other | public - federal | XX | XX |

Table 3 - Resources Made Available

Narrative

CmDv did not receive any CDBG program income over the \$25,000 threshold.

The City collected HOME program income for a total of \$XX in FY2022-2023. This PI was added in IDIS HOME local account and will be spent prior to using any available HUD HOME funds.

Identify the geographic distribution and location of investments

| Target Area | Planned Percentage of Allocation | Actual Percentage of Allocation | Narrative Description |
|----------------------|----------------------------------|---------------------------------|--|
| Slum & Blight Area 1 | 70 | XX | CDBG Funds spent on code enforcement, demolition, and housing. |

Table 4 – Identify the geographic distribution and location of investments

Narrative

The City spent XX% of the funding in the CDBG Target Areas. Funds were allocated and drawn to complete code enforcement actions and demolition of structures not meeting local building codes.

Leveraging

Explain how federal funds leveraged additional resources (private, state and local funds), including a description of how matching requirements were satisfied, as well as how any publicly owned land or property located within the jurisdiction that were used to address the needs identified in the plan.

In FY 2022-2023, the City of Alexandria was XXX% exempted from match requirements. See the IDIS PR33 report attached. The City does not have a publicly owned land or property that was used to address the needs in this plan. This report also shows that CmDv has a balance of \$41,169.30 that is being carried forward from PY 2014.

| Fiscal Year Summary – HOME Match | |
|--|--------|
| 1. Excess match from prior Federal fiscal year | 41,169 |
| 2. Match contributed during current Federal fiscal year | 0 |
| 3. Total match available for current Federal fiscal year (Line 1 plus Line 2) | 41,169 |
| 4. Match liability for current Federal fiscal year | 0 |
| 5. Excess match carried over to next Federal fiscal year (Line 3 minus Line 4) | 41,169 |

Table 5 – Fiscal Year Summary - HOME Match Report

| Match Contribution for the Federal Fiscal Year | | | | | | | | |
|--|----------------------|----------------------------|-------------------------------|------------------------------|-------------------------|---|----------------|-------------|
| Project No. or Other ID | Date of Contribution | Cash (non-Federal sources) | Foregone Taxes, Fees, Charges | Appraised Land/Real Property | Required Infrastructure | Site Preparation, Construction Materials, Donated labor | Bond Financing | Total Match |
| | | | | | | | | |

Table 6 – Match Contribution for the Federal Fiscal Year

HOME MBE/WBE report

| Program Income – Enter the program amounts for the reporting period | | | | |
|---|---|---|--------------------------------|--|
| Balance on hand at begin-ning of reporting period \$ | Amount received during reporting period \$ | Total amount expended during reporting period \$ | Amount expended for TBRA \$ | Balance on hand at end of reporting period \$ |
| 0 | XX | 0 | 0 | XX |

Table 7 – Program Income

| Minority Business Enterprises and Women Business Enterprises – Indicate the number and dollar value of contracts for HOME projects completed during the reporting period | | | | | | |
|--|-------|-----------------------------------|---------------------------|--------------------|----------|--------------------|
| | Total | Minority Business Enterprises | | | | White Non-Hispanic |
| | | Alaskan Native or American Indian | Asian or Pacific Islander | Black Non-Hispanic | Hispanic | |
| Contracts | | | | | | |
| Dollar Amount | 0 | 0 | 0 | 0 | 0 | 0 |
| Number | 0 | 0 | 0 | 0 | 0 | 0 |
| Sub-Contracts | | | | | | |
| Number | 0 | 0 | 0 | 0 | 0 | 0 |
| Dollar Amount | 0 | 0 | 0 | 0 | 0 | 0 |
| | Total | Women Business Enterprises | Male | | | |
| | | Contracts | | | | |
| Dollar Amount | 0 | 0 | 0 | | | |
| Number | 0 | 0 | 0 | | | |
| Sub-Contracts | | | | | | |
| Number | 0 | 0 | 0 | | | |
| Dollar Amount | 0 | 0 | 0 | | | |

Table 8 - Minority Business and Women Business Enterprises

| Minority Owners of Rental Property – Indicate the number of HOME assisted rental property owners and the total amount of HOME funds in these rental properties assisted | | | | | | |
|---|-------|-----------------------------------|---------------------------|--------------------|----------|--------------------|
| | Total | Minority Property Owners | | | | White Non-Hispanic |
| | | Alaskan Native or American Indian | Asian or Pacific Islander | Black Non-Hispanic | Hispanic | |
| Number | 0 | 0 | 0 | 0 | 0 | 0 |
| Dollar Amount | 0 | 0 | 0 | 0 | 0 | 0 |

Table 9 – Minority Owners of Rental Property

| Relocation and Real Property Acquisition – Indicate the number of persons displaced, the cost of relocation payments, the number of parcels acquired, and the cost of acquisition | | | | | | |
|---|-------|-----------------------------------|---------------------------|--------------------|----------|--------------------|
| Parcels Acquired | | 0 | 0 | | | |
| Businesses Displaced | | 0 | 0 | | | |
| Nonprofit Organizations Displaced | | 0 | 0 | | | |
| Households Temporarily Relocated, not Displaced | | 0 | 0 | | | |
| Households Displaced | Total | Minority Property Enterprises | | | | White Non-Hispanic |
| | | Alaskan Native or American Indian | Asian or Pacific Islander | Black Non-Hispanic | Hispanic | |
| Number | 0 | 0 | 0 | 0 | 0 | 0 |
| Cost | 0 | 0 | 0 | 0 | 0 | 0 |

Table 10 – Relocation and Real Property Acquisition

CR-20 - Affordable Housing 91.520(b)

Evaluation of the jurisdiction's progress in providing affordable housing, including the number and types of families served, the number of extremely low-income, low-income, moderate-income, and middle-income persons served.

| | One-Year Goal | Actual |
|--|---------------|--------|
| Number of Homeless households to be provided affordable housing units | 0 | 0 |
| Number of Non-Homeless households to be provided affordable housing units | XX | XX |
| Number of Special-Needs households to be provided affordable housing units | 0 | 0 |
| Total | XX | XX |

Table 11 – Number of Households

| | One-Year Goal | Actual |
|--|---------------|--------|
| Number of households supported through Rental Assistance | 0 | 0 |
| Number of households supported through The Production of New Units | X | 0 |
| Number of households supported through Rehab of Existing Units | X | X |
| Number of households supported through Acquisition of Existing Units | 0 | 0 |
| Total | X | X |

Table 12 – Number of Households Supported

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

The City worked diligently in FY2022-2023 to develop and promote affordable housing opportunities to meet the goals identified in the FY2020-2024 Five (5) Year Consolidated Plan. The CDBG-CV Minor Rehab, CDBG Code Enforcement and Demolition Programs were successful and exceeded their goals. However, interest from Developers and potential homebuyers for both CDBG and HOME funded affordable housing opportunities were unsuccessful due to the unstable economy and overall unknown impact of the virus.

Developers were especially concerned with “all the red tape to only get a little money to fund a big project” and escalating construction material costs. It seems there is more liability than reward built into the structure of the HOME regulations. The biggest deterrents were: the volume of paperwork, financial documents and proforma that was required for proposal submittal; market demand for infill housing in distressed Target Neighborhoods; the request to provide a portion of the 25% match funds per HUD CPD Notice 97-03; and HUD regulation 24 CFR 92.254(a)(3) requiring the HOME funded units to be converted to rental if not sold within nine (9) months of project completion.

Keeping Contractors motivated to participate in the programs has been another hurdle. There is lots of paperwork, regulations and unforeseen issues that can significantly impact the profit margin on any job. The City has been extremely sensitive and responsive to all Contractor input to continue to encourage and grow participation.

Discuss how these outcomes will impact future annual action plans.

Contractor input is shaping how programs defined, therefore, all proposed activities are being modified to respond to those concerns with every subsequent Annual Action Plan. As the City identifies problems within our growing programs, the staff is quick to update the program guidelines to avoid confusion or subsequent problems as the programs grow. In the last 12 months, the City’s staff has noticed more inquiries to Contractor Registration so we take that as a good sign!

Include the number of extremely low-income, low-income, and moderate-income persons served by each activity where information on income by family size is required to determine the eligibility of the activity.

| Number of Households Served | CDBG Actual | HOME Actual |
|-----------------------------|-------------|-------------|
| Extremely Low-income | xx | 0 |
| Low-income | xx | 0 |
| Moderate-income | 0 | 0 |
| Total | xx | 0 |

Table 13 – Number of Households Served

Narrative Information

During the program year, the City focused on limited repair of owner-occupied housing.

The City was able to assist xx owner households having annual income 30% and below the median for the Alexandria area, which for a household size of 4 was \$xx.

CR-25 - Homeless and Other Special Needs 91.220(d, e); 91.320(d, e); 91.520(c)

Evaluate the jurisdiction's progress in meeting its specific objectives for reducing and ending homelessness through:

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

The Continuum of Care utilizes the services of the outreach teams to spread the word about programs and services available to the general homeless population, regardless of race, color, national origin, religion, sex, age, familial status, or disability. As part of its strategic planning process, the CoC plans to ensure that outreach materials are available to anyone with a disability or anyone of a different national origin. Volunteers of Americas outreach program serves those persons who routinely sleep on the streets. The outreach team is familiar with the locations of "camps" where homeless people tend to live.

In addition, VOA holds a monthly outreach event called "Helping to Overcome Homelessness (H2O)". The H2O event establishes a "one stop shop" for homeless services, wherein providers across the CoC set up and provide services such as HIV/AIDS testing, VI-SPDAT assessments, Veteran's services, food, clothing, and more. By holding the event at the end of the month, the event caters to the needs of unsheltered people whose resources of SSI/SSDI have run out. As part of the outreach plan for rural communities, this H2O model is being expanded to rural communities throughout the geographic area, with events planned in all eight of the parishes served by the CoC.

Addressing the emergency shelter and transitional housing needs of homeless persons

The City will continue to participate in the Continuum of Care and assist when possible with emergency shelter and transitional housing needs. Goals for these activities are not currently included in this plan as they are typically assisted with General Funds.

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

In the current program year, CmDv will fund a program aimed at diverting homeless and near homeless away from the shelter system and to living arrangements with families and friends. The CoC has adopted the following discharge coordination policies to prevent homelessness for those leaving the care of public institutions:

1. Foster Care

Locally, the foster care system collaborates with Eckerd to provide wrap-around services to the population that is leaving foster care. Eckerd assists these participants with seeking mainstream benefits and housing supports to ensure that they do not become homeless as a result of leaving the foster care system.

2. Health Care

Locally, hospitals are beginning to reach out to CoC providers in advance of someone being discharged so that proper assessments can take place before the person is discharged. The CoC can assist the hospital in seeking housing options so that no one is homeless upon discharge. Housing options might include placement in a PSH program if the person is deemed chronically homeless, linkages to programs like SSVF and VASH if they are leaving the VA Hospital, and referrals to programs for those who are mentally ill and/or substance abusers.

3. Mental Health

Volunteers of America has been designated by the CoC as the agency that provides linkages between the mental health system and the homeless system. Volunteers of America has several programs that are not CoC-funded that link persons to resources available to ensure housing stability, and also has three PSH CoC-funded programs that serve only those chronically homeless individuals/families who have a mental illness. With mental illness the leading cause of homelessness locally, having a PSH program where beds are designated specifically for this population ensures that no mentally ill person leaving a mental health facility will be homeless.

4. Corrections

The Louisiana Department of Corrections routinely refers people to the local Re-entry Solutions program. Re-entry Solutions is a local nonprofit that provides services to persons who are recently released from incarceration, in addition to providing services the families of those who are incarcerated. Re-entry Solutions works with project participants to obtain jobs, and even provides temporary housing for some of the participants through the Safe Landing program. VOA is providing case management and housing assistance to ex-offenders being released in Rapides Parish. Ex-offenders are followed for six (6) months upon release from prison and are assessed according to their needs before release to ensure a reduction in recidivism: housing, transportation, education, employment, legal and more.

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 CoC has developed a Committee on Chronic Homelessness that includes street outreach workers and case managers of PSH programs. The committee is responsible for identifying, assessing, and prioritizing chronically homeless individuals for placement into PSH programs. By increasing its beds designated for use by the chronically homeless, the CoC believes it has ended chronic homelessness in the region.

Locally, resources for homeless veterans are plentiful. The CoC is also requesting additional rapid rehousing funds to serve literally homeless families.

In regard to preventing a return to homelessness, each provider within the CoC conducts follow-up at 90 days, 180 days, and twelve month intervals. These follow-up assessments are documented within the CoC's HMIS. During the follow-up, if an issue is discovered that could possibly result in a family returning to homelessness, the Case Manager provides ongoing case management sessions to assist the family with obtaining the proper supports to prevent them from returning to homelessness.

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

Actions taken to address the needs of public housing

Public Housing is administered by the City of Alexandria Public Housing Authority (AHA). There are City employees who participate on the AHA's Board and share information about respective programs. However, the City does not plan on providing financial assistance to the PHA since it receives its own direct allocation from HUD.

The AHA independently manages several programs, such as: Public Housing Development Program; Section 8 Rental Voucher Program; Public Housing Capital Funds; Public Housing Replacement Housing Capital Funds; Section 8 Loan Management Set-Aside; Section 202 Housing Set-Aside; and Section 811 Funds.

The City will coordinate actions to include: marketing of homebuyer education, credit counseling and homebuyer assistance to public housing residents and posting job and employment opportunities to attract Section 3 qualified residents.

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

The Alexandria Housing Authority encourages active participation from residents. There are monthly resident council meetings held at each of the developments. Residents are invited to meet and greet, share their concerns and organize activities for their developments. One or more employees of the AHA are always present to answer questions and document the concerns of the residents.

In addition, one resident is appointed to the Board of Commissioners. The AHA conducts periodic customer satisfaction surveys as a means for residents to discreetly voice their concerns and to ensure that the best possible customer service is being provided by the agency.

In regard to homeownership, the AHA is planning to offer homeownership as an option through its Housing Choice Voucher Program.

Actions taken to provide assistance to troubled PHAs

The Alexandria Public Housing Authority is not designated as troubled.

CR-35 - Other Actions 91.220(j)-(k); 91.320(i)-(j)

Actions taken to remove or ameliorate the negative effects of public policies that serve as barriers to affordable housing such as land use controls, tax policies affecting land, zoning ordinances, building codes, fees and charges, growth limitations, and policies affecting the return on residential investment. 91.220 (j); 91.320 (i)

The City will explore different possibilities in terms of program design of its housing programs to reduce the effects of the federal flood insurance requirement. Potential solutions include using the federal dollars to leverage additional assistance from local lenders, subsidizing the insurance premium with CDBG funds, and making bigger per-unit investments to address flood concerns.

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

In recent years, the City has experienced several obstacles to meeting the underserved needs in its community.

One of the main obstacles encountered by the City in its efforts to revitalize its Target Neighborhoods is clouded title on vacant and abandoned properties. State law makes it difficult for the City to clear title on these properties, which is a vital first step in redeveloping the blighted properties into useful and valuable elements of the neighborhood.

In regard to its new affordable housing, the City has encountered is the lack Developers willing to submit proposals. The City will consider new ways to structure programs to attract Developers while limiting their exposure to risk factors.

Another obstacle related to the housing repair program is the requirement to maintain flood insurance on homes rehabilitated within flood zones. About 54% of the City's overall Target Neighborhoods are within the flood zone and would require flood insurance for investments above the \$10,000 threshold.

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

The federal government banned lead-based paint from housing in 1978. Many homes built before 1978 have lead-based paint and this is estimated at 12,500 lead positive units in the City of Alexandria. Lead is especially dangerous for pregnant women and households with children under the age of six (6). Lead poisoning is one of the most widespread environmental hazards and environmental threats facing children's health today. High blood lead levels are due mostly to deteriorated lead-based paint in older homes and contaminated dust and soil. Soil that is contaminated with lead is an important source of lead exposure because children play outside and very small children frequently put their hands in their mouths.

The City ensured all of its federally-funded housing programs are in full compliance with the lead-based

paint hazard regulations (24 CFR Part 35). This includes assisting households with the appropriate lead-based paint inspection, testing, and abatement of lead-based paint hazards. The City will provide education through the distribution of lead-based paint information and literature and will seek greater coordination with state agencies to leverage additional resources. The City will work with its contractors, subrecipients and community partners to ensure all funded programs are in full compliance with the updated regulation.

The City's housing inventory study shows that there are more than 12,500 were houses built before 1980 and possibly subject to lead hazards. In response, the City was awarded HUD's competitive Lead Remediation Grant. Most of the City's older demographic continues to care for small grandchildren on a regular basis. The remediation of those hazards will help to keep those environmental risks at a minimum while the residents continue to age in place and remove the hazard for safe occupancy of children under the age of six (6).

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

According to the 2014-2018 ACS, the City as a whole has an overall poverty rate of 23.6%. In Alexandria, poverty rates vary throughout the City. Poverty is more highly concentrated in the eastern half of the city where some tracts report 40% of households in poverty. These areas tend to have a larger than average Black population and lower median household incomes. The poverty rate for African Americans (35%) is nearly five times that of Whites (7.6%).

Given the statistics stated above, the City's efforts to reduce the number of poverty-level families should focus on support services to areas of higher poverty concentration. When feasible, the City will provide job training, employment, and contract opportunities for public housing residents and other low- and moderate-income residents in connection with construction projects funded under the Consolidated Plan. This provision helps foster local economic development, neighborhood economic improvement, and individual self-sufficiency. In this way, the City will comply with Section 3 of the Housing and Urban Development Act of 1968.

The City will also coordinate with the Louisiana Department of Children and Family Services, which administers the major federal programs aimed at assisting persons escape from poverty, including the Supplemental Nutrition Assistance Program (i.e. food stamps), Child Care Assistance Program (CCAP), and Family Independence Temporary Assistance Program (FITAP).

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

The City of Alexandria Community Development Department acts as the lead agency for the development and administration of the Consolidated Plan and its funded projects. The Community Development Department relies on a number of partners, including non-profit organizations, contractors, and other public agencies to undertake the projects funded through the Consolidated Plan. The City is fortunate to have a number of qualified staff at the sub-recipient level and quality non-profit

organizations to assist in the implementation of its Consolidated Plan. The City has identified one serious gap in the institutional delivery system and a number of areas where the City will work to improve the delivery of the funded programs.

The largest gap within the institutional delivery system is the lack of safe, sustainable, affordable housing. As discussed throughout the Consolidated Plan and Action Plan, the City is working to leverage funds to help close the gap on affordability while creating opportunities that enhance the quality of life for its residents.

There is a need to develop and build the capacity of local organizations that could potentially qualify as a CHDO to carry out affordable housing development projects. As part of this planning process, the City consulted with the public housing authority regarding the possibility of forming a subsidiary organization that could act as a CHDO. Going forward, the City will actively seek out qualified agencies who could act as a CHDO.

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

As a result of the planning process that led to the development of this Consolidated Plan, the City has reaffirmed its working relationships with some of the major service providers and planning efforts in the areas of affordable housing, community development, and homelessness. Over the course of the program year, the City will seek to build on existing relationships and establish new connections with community partners.

- The City will continue to play an active role in the local Continuum of Care; and
- The City will coordinate with the public housing authority by sharing information about their respective programs.

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

The City of Alexandria updated its Analysis of Impediments to Fair Housing Choice Report (AI) as part of its strategic planning process, identifying three (3) primary impediments and local fair housing issues. For more detailed information, a copy of the AI can be obtained from the City's Community Development Department 625 Murray Street or on our website at www.cityofalexandria.com/Community-Development.

Impediment #1: Lack of Public Awareness & Education

High levels of public awareness and education regarding housing rights is a pre-requisite to fair housing choice. This goes beyond basic awareness of housing rights and includes information about how discrimination exists today. Discriminatory practices are more subtle today than in years past and may

go unnoticed by an uninformed housing consumer.

The City created links and downloadable information on City's web site dedicated to affirmatively furthering fair housing and provides flyers and tri-fold handouts for distribution in public spaces at City properties and at meetings and seminar gatherings with the public.

The City designated the Community Development Administrator as the fair housing representative for the City for intake and dissemination of complaint process and substantially amended its IA plan in 2018 and will plan for more education in the upcoming years.

The City has not received any Fair Housing complaints in the last five (5) years. However, in the event we do, the City will try to identify fair housing violations in housing programs such as housing counseling, down payment assistance and monitoring fair housing compliance with HOME-funded rentals.

Impediment #2: Lack of Coordination

There is not one consistent response to where complaints should go when a person or family has been discriminated against in housing. Unfortunately, there is no local agency dedicated to fair housing. City residents must rely on resources at the state and federal level.

The City developed reasonable accommodation materials for its staff and officials involved with zoning and land use decisions and sponsored a Fair Housing seminar in 2020 which was open to the entire community, however, zoning officials and City legal staffs were encouraged to attend. The City has worked with the Greater New Orleans Fair Housing Action Center to request training seminars and to be added to regular mailers and events notices.

In the event the City is presented with Fair Housing concerns, the City will coordinate with officials, staff, and legal counsel associated with zoning decisions to ensure all are fully educated on fair housing law, especially as it pertains to reasonable accommodation.

Impediment #3: Potential Discrimination in Housing Market

A review of Housing Mortgage Disclosure Act (HMDA) data revealed higher loan denial rates in minority populations in mortgage lending. Measures associated with financial and housing counseling may be appropriate to inform minorities of the reasoning behind loan denials. The AI identified actions to be taken in order to address and alleviate the identified impediments. Below is a summary of each proposed action and the City's efforts in the program year to carry them out:

The City plans to host the Greater New Orleans Fair Housing Center for a fair housing activity within CENLA in future years. The City will also consider conducting focused testing in order to determine the extent and magnitude of discrimination within the housing market.

CR-40 - Monitoring 91.220 and 91.230

Describe the standards and procedures used to monitor activities carried out in furtherance of the plan and used to ensure long-term compliance with requirements of the programs involved, including minority business outreach and the comprehensive planning requirements

The City of Alexandria has implemented comprehensive monitoring of programs and activities described in the Consolidated Plan, as well as for organizations and activities funded by the City. The monitoring plan is directed to ensure program performance, financial performance, and regulatory compliance. The Community Development Department of the City of Alexandria is the primary entity for carrying out programs in the 2022 Action Plan.

The procedures planned for use in monitoring applicable programs and projects undertaken by other organizations are comprehensive by design and will be carried out on differing schedules and in differing formats dependent upon the scope and nature of the individual projects. comprehensive planning requirements, affordability, leasing and other long-term requirements. The City of Alexandria plans to fully protect the investment of public funds in those projects and activities implemented by the City and those undertaken by other individuals and organizations. Organizations or entities requiring monitoring by the City will be notified of the planned monitoring procedures, which include:

- project implementation and required record keeping
- Yearly monitoring and extensive on-site reviews of projects and records
- Formal grant agreements, approved by the city council and executed, with each nonprofit agency or subcontractor
- All capital improvement contracts will be monitored for compliance with Davis-Bacon wages, Section 3 and other federal requirements during the construction of the project.
- Timely performance of required activities
- Construction standards
- Compliance with applicable regulations, including affordability requirements, eligibility of program beneficiaries, labor requirements, environmental regulations, affirmative action, equal opportunity, fair housing, ADA, Section 3, and minority outreach requirements.
- Maintenance of acceptable financial management standards
- Reasonableness and appropriateness of costs
- Integrity and composition of organization
- Timeliness of expenditures
- Compliance with goals and objectives

All rehabilitation and new construction projects are inspected during construction and at completion to ensure compliance with applicable housing code requirements. Any discrepancies are corrected prior to approval. Rental property rehabilitation projects are inspected annually during the affordability period to ensure compliance.

In the event of non-performance or breach of agreements, the City will fully enforce remedies on default or other means of satisfactorily achieving the goals and intended purposes of Consolidated Plan programs. Monitoring standards and procedures will be evaluated and modified, as needed, to ensure all program requirements are adhered to and addressed satisfactorily.

CmDv views monitoring as an ongoing process involving continuous communication and evaluation. The overriding goal of monitoring was to identify deficiencies and promote corrections to improve and reinforce performance. Deficiencies were corrected through discussion, negotiation or technical assistance.

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

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

This report will be advertised and available for public review and comment for a fifteen (15) calendar day public comment period beginning May 5, 2023. (Attachment A-1). The City will solicit written comments until March 22, 2023. A Citizens Advisory Committee meeting was held on Month Date, 2023. (Attachment A-2 & A-3). The complete written document remains available for review on our webpage. The City Council will also hold a public hearing on May 30, 2023 to adopt the CAPER. The City Council adopted by Resolution #xxx-2023. (Attachment A-4).

CR-45 - CDBG 91.520(c)

Specify the nature of, and reasons for, any changes in the jurisdiction's program objectives and indications of how the jurisdiction would change its programs as a result of its experiences.

During 2022, the City modified its objectives for Goal 3: Provide Emergency Assistance. CDBG-CV funds were shifted from emergency assistance to housing rehabilitation to better serve the needs of the community.

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

No

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

CR-50 - HOME 91.520(d)

Include the results of on-site inspections of affordable rental housing assisted under the program to determine compliance with housing codes and other applicable regulations

Please list those projects that should have been inspected on-site this program year based upon the schedule in §92.504(d). Indicate which of these were inspected and a summary of issues that were detected during the inspection. For those that were not inspected, please indicate the reason and how you will remedy the situation.

During the program year the City normally performs desk monitoring of past HOME projects (**Attachment D**) for long term affordability compliance. In FY2020-2022, the City performed onsite and desk monitoring on all properties.

CmDv conducted onsite monitoring on the HOME Homebuyer Projects for Sugarhouse Road and Green Oaks (6th Street) Development.

- Green Oaks (6th Street) – 3 units total Desk monitoring was performed. There were no issues detected.
- Sugarhouse Road – 3 units total Desk monitoring was performed. No issues were detected.
- CmDv also conducted desk monitoring on the three (3) of the past HOME Rental Developments that are still within their affordability periods:
 - Armour Place (1901 3rd Street)–7 Units total Desk monitoring was performed on all units. One (1) over-income compliance issue was found at Unit 1821-B. Armour Place has been advised of their non-compliance issue and will be making appropriate adjustments to the tenant’s rent at lease renewal. Two (2) physical inspections of Units 1821-D and 1821-B were performed and no issues were detected.
 - Enterprise Place (2609 Irish Lane; 2404, 2417 and 2419 Jameson Court) – 36 Units total Desk monitoring was performed on all units and no issues were detected.
 - Bethel Apartments (724 Willow Glen River Road) – 90 Units total Desk monitoring was performed on all units. One (1) over-income compliance issue was found at Unit 704-B. Bethel Apartments’ was advised of their non-compliance issue. They performed another annual income recertification and found that one of the household members with contributing income no longer occupied the unit, therefore, the income recertification and occupancy count brought the unit back into compliance. This issue is resolved.

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

Affirmative marketing consists of additional actions taken beyond typical advertising efforts that are established to attract eligible persons who may otherwise not apply. The City requires affirmative marketing for available housing units in developments that have five or more HOME-assisted units,

which includes Armour Place and Bethel Apartments. The City only requests updates to the affirmatively marketing information every five years. The Program Manager has verified these properties have their certification and remain in compliance with their affirmative marketing requirements. Since 2015, the City did not fund any developments that met this threshold.

Affirmative marketing of business opportunities under the HOME Program include but are not limited to, hiring of persons and businesses for consultant services, vendors, contractors, developers and property owners that enter into agreements funded through HOME. The City is required to adopt procedures to ensure the inclusion of minorities and women, to the maximum extent possible, in all contracting opportunities made possible through HOME funding. This includes opportunities for all types of business, including but not limited to real estate firms, construction firms, appraisal firms, management firms, financial institutions, investment banking firms, underwriters, accountants, and other professional services.

As a whole, the City has adopted the Alexandria Fairness, Equality, Accessibility, and Teamwork Program (AFEAT). As part of this program, each contractor must show a good faith effort to include female owned and minority owned businesses in City contracts. In the program year, the City did not provide HOME dollars to any contractors as most funds were budgeted for CHDO activities.

Refer to IDIS reports to describe the amount and use of program income for projects, including the number of projects and owner and tenant characteristics

The City collected HOME program income for a total of \$X in FY2022-2023. This PI was added in IDIS HOME local account and will be spent prior to using any available HUD HOME funds.

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

The City did engage 2 Developers for affordable rental housing. One was awarded the PRIME-2 NOFA by Louisiana Housing Corporation for additional funds to start the development of 64 new rental units. Additionally, the City exceeded its goal in minor rehabs to existing owner-occupied homes to extend their useful life and remain affordable to the families that occupy them since most homes do not have a mortgage.

CR-58 – Section 3

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

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

Table 14 – Total Labor Hours

| Qualitative Efforts - Number of Activities by Program | CDBG | HOME | ESG | HOPWA | HTF |
|---|------|------|-----|-------|-----|
| Outreach efforts to generate job applicants who are Public Housing Targeted Workers | | | | | |
| Outreach efforts to generate job applicants who are Other Funding Targeted Workers. | | | | | |
| Direct, on-the job training (including apprenticeships). | | | | | |
| Indirect training such as arranging for, contracting for, or paying tuition for, off-site training. | | | | | |
| Technical assistance to help Section 3 workers compete for jobs (e.g., resume assistance, coaching). | | | | | |
| Outreach efforts to identify and secure bids from Section 3 business concerns. | | | | | |
| Technical assistance to help Section 3 business concerns understand and bid on contracts. | | | | | |
| Division of contracts into smaller jobs to facilitate participation by Section 3 business concerns. | | | | | |
| Provided or connected residents with assistance in seeking employment including: drafting resumes, preparing for interviews, finding job opportunities, connecting residents to job placement services. | | | | | |
| Held one or more job fairs. | | | | | |
| Provided or connected residents with supportive services that can provide direct services or referrals. | | | | | |
| Provided or connected residents with supportive services that provide one or more of the following: work readiness health screenings, interview clothing, uniforms, test fees, transportation. | | | | | |
| Assisted residents with finding child care. | | | | | |
| Assisted residents to apply for, or attend community college or a four year educational institution. | | | | | |
| Assisted residents to apply for, or attend vocational/technical training. | | | | | |
| Assisted residents to obtain financial literacy training and/or coaching. | | | | | |
| Bonding assistance, guaranties, or other efforts to support viable bids from Section 3 business concerns. | | | | | |
| Provided or connected residents with training on computer use or online technologies. | | | | | |
| Promoting the use of a business registry designed to create opportunities for disadvantaged and small businesses. | | | | | |
| Outreach, engagement, or referrals with the state one-stop system, as designed in Section 121(e)(2) of the Workforce Innovation and Opportunity Act. | | | | | |
| Other. | | | | | |

Table 15 – Qualitative Efforts - Number of Activities by Program

ATTACHMENTS

Attachment A – Citizen Participation Documentation

Attachment B – Accomplishments

Attachment C – Monitoring Addresses

Attachment D – IDIS Reports

CDBG Financial Summary Reports

