

City of Goldsboro
2014- 2015
Annual Action Plan

Community Development Block Grant (CDBG)
Home Investment Partnership (HOME)



2014-2015 ANNUAL ACTION PLAN

COMMUNITY DEVELOPMENT BLOCK GRANT PROGRAM AND HOME INVESTMENT PARTNERSHIP PROGRAM



CITY OF GOLDSBORO, NORTH CAROLINA

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EXECUTIVE SUMMARY (91.220 (b))

The City of Goldsboro is an Entitlement City according to the U.S. Department of Housing and Urban Development (HUD) criteria. Accordingly, the City receives annual allocations of funds for housing and community development projects under the Community Development Block Grant (CDBG) and Home Investment Partnership (HOME) Programs. As an Entitlement City and as a prerequisite to receive funding, the City of Goldsboro is required to conduct a comprehensive assessment of its housing and community needs and to present a Five-Year Consolidated Plan in a detailed format prescribed by HUD. A yearly Action Plan is required for each of the five years of the City's Consolidated Plan. This is the fifth year of the City's Five-year Consolidated Plan (2010-2014), which covers July 1, 2014 through June 30, 2015.

The Action Plan identifies key priorities and goals that would significantly improve low-to-moderate-income citizens of Goldsboro quality of life through vital housing and community development programs. The Action Plan is derived from the methodologies established in the Five-Year Consolidated Plan and it is formulated in a collaborative manner with the assistance of management staff within the Department of Planning and Community Development. In addition, the Action Plan is integrated with contributions from public forums and inter-departmental discussions (i.e., citizens, City Council, non-profit organizations, Community Affairs Department, Community Development Organizations (CBO), Community Housing Development Organizations (CHDO), and Faith-based Organizations (FBO)). The City also utilized the Community Development Advisory Committee, Loan Review Committee, and Continuum of Care Housing Support Committee to discuss the planning process and solicit input for the 2014-2015 Action Plan. Staff regularly attended community group and association meetings in the City limits throughout the year, which created partnerships, maintain meaningful and productive relationships in the community, and enhanced the Department's ability to develop responsive and relevant programs. The City of Goldsboro completed many of its strategic community goals in year 2013-2014. The top priorities and goals determined in the 2014-2015 Action Plan include the following:

- ✓ Rehabilitation of owner-occupied single family units
- ✓ Acquisition, demolition, and clearance of dilapidated housing units
- ✓ Improving and/or preserving communities in danger of slum and blight conditions
- ✓ Construction of affordable housing through CHDO Activities
- ✓ Providing homebuyer assistance for first-time homebuyers
- ✓ Support projects or programs by non-profit organizations or for-profit corporations that benefit low-to-moderate-income (LMI) residents of the City
- ✓ Identification of infrastructure improvements (i.e., sewer, sidewalk, water line etc.)
- ✓ Eliminating hazardous materials in dwellings assisted with federal funds

BRIEF OVERVIEW OF THE CDBG & HOME PROGRAMS

The Community Development Block Grant (CDBG) Program is authorized under Title 1 of the Housing and Community Development Act of 1974, as amended. The primary objective of the CDBG Program is the development of viable urban communities, by providing decent housing, suitable living environment, and expanding economic opportunities, principally for persons of low and moderate income. CDBG funds can only be used in compliance with the national

objectives and eligibility requirements of the program; all of Goldsboro's CDBG-funded activities in the 2014-2015 Action Plan meet at least one of these national objectives:

- Benefit to low and moderate income families,
- Aid in the prevention or elimination of slums and blight,
- Addressing urgent needs

The HOME Investment Partnership (HOME) Program was created by the National Affordable Housing Act of 1990 to create local partnerships for providing decent affordable housing to lower-to-moderate income households. It was intended that local participating jurisdictions work with nonprofit organizations and private investment organizations within the community to achieve this goal. Cities may use their HOME funds to help renters, new homebuyers, or existing homeowners. The HOME Program is designed to provide affordable housing to low-to-moderate income families and individuals. Therefore, the program has rules about targeting program resources and establishing applicant eligibility.

HUD is required by law to set income limits in determining eligibility of applicants for assisted housing programs, which use HUD funds. The income guidelines provided to the City reflect incomes for the Goldsboro Metropolitan Statistical Area (MSA). The table below contains 2013 income limits with breakdowns by family size and income categories for Goldsboro. Low-to-moderate-income (LMI), as defined by HUD, refers to households earning 80% or less than the area median income, adjusted for family size. These guidelines form the basis of eligibility criteria for the City's CDBG and HOME- funded projects. According to the 2010-2014 Consolidated Plan, Goldsboro families with incomes at or below 30% of the area median income are at the greatest risk for housing problems.

2014 Income Levels (Source: U.S. Department of HUD)				
	Extremely Low Income	Very Low Income	Low Income	Moderate Income
Persons in Household	<30% of AMI	30%-50% of AMI	51%-80% of AMI	81%-95% of AMI
1	\$10,700	\$17,850	\$21,420	\$28,500
2	\$12,200	\$20,400	\$24,480	\$32,600
3	\$13,750	\$22,950	\$27,540	\$36,650
4	\$15,250	\$25,450	\$30,540	\$40,700
5	\$16,500	\$27,500	\$33,000	\$44,000
6	\$17,700	\$29,550	\$35,460	\$47,250
7	\$18,950	\$31,600	\$37,920	\$50,500
8	\$20,150	\$33,600	\$40,320	\$53,750

These families also have the greatest risk of exposure to lead-based paint hazards. The 2014 Median Family income in Goldsboro is \$49,800. Census median family income (MFI) estimates are updated with county-level Bureau of Labor Statistics earnings data, Census American Community Survey (ACS), state-level MFI estimates, or ACS local area MFI estimates. Separate HUD MFI estimates are calculated for all MSAs and nonmetropolitan counties. HUD uses the Section 8 program's Fair Market Rent (FMR) area definitions in developing median

family income estimates for a given area. HUD income limits are calculated for every FMR area with adjustments for family size and for areas with unusually high or low income-to-housing cost relationships. HUD sets income limits to determine eligibility for each Entitlement's programs and services. FY 2014-2015 MFI estimates are based on data generated by the census for that community, and are updated annually.

CITIZEN PARTICIPATION (91.200 and 91.220 (b))

The City of Goldsboro provided for and encouraged citizen participation in the planning, implementation, and assessment of community needs for the 2014-2015 Action Plan. The City placed particular emphasis on participation by persons of low-to-moderate income that are residents of low and moderate-income neighborhoods slum and blighted areas, and/or reside in public housing within the City limits. This was done through public meetings/hearings scheduled by the City, which were advertised in the local newspaper Goldsboro News-Argus, local television station, and the City's website www.goldsboro.nc.gov and email blast at least 14 days in advance. The City of Goldsboro provided a minimum of three public meetings and/or hearings to allow citizens' the opportunity to be actively involved in the planning, implementation, and assessment of community needs to be addressed during all stages of the compilation of the 2014-2015 Action Plan (see attachment 3). A public hearing was held on Monday, April 21, 2014 at 7:00 pm during the regular meeting of the Mayor and City Council to allow citizens the opportunity to comment on the 2014-2015 Action Plan.

The City's public meetings and hearing were accessible to persons with disabilities and a translator was made available for non-English speaking residents in the case of public meetings/hearings when the City was notified that a non-English speaking resident would be in attendance. In addition, an interpreter was available for hearing-impaired residents.

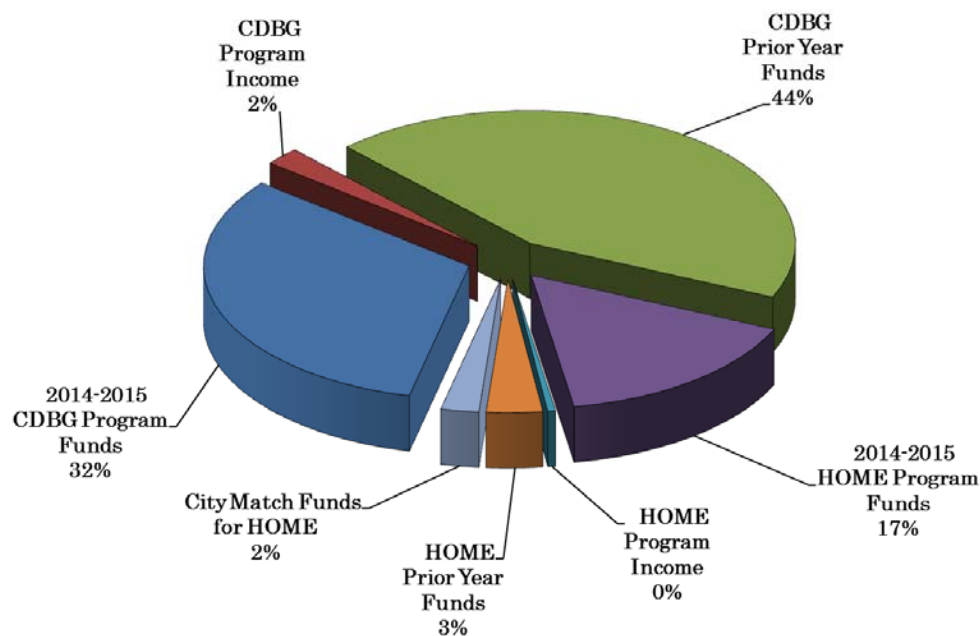
Comments –The City of Goldsboro provided citizens with reasonable and timely access to the Annual Action Plan as related to the City's proposed activities and use of funds. A notice of the City's thirty (30) day-review from March 21, 2014 through April 21, 2014, which summarized the City's proposed activities and use of funds was published in the Goldsboro News Argus on March 6, 2014. The 2014-2015 Action Plan was available at the City's Planning Department, the Office of the City Clerk in the City Hall Annex, 200 North Center Street, at the Community Development and Community Development office in the Historic City Hall Building, 214 North Center Street, at the Wayne County Public Library, 1001 East Ash Street, Goldsboro, at the Goldsboro Housing Authority, 1729 Edgerton Street, Goldsboro, and on the City's website at www.goldsboronc.gov. **The City of Goldsboro did not receive any comments to incorporate into the final report of the 2014-2015 Annual Action Plan.**

RESOURCES (91.220 (c) (1) and (c) (2))

The Annual Action Plan describes the City's plan for the expenditure of federal dollars for the coming fiscal year to carry out the goals and objectives prioritized in the City's Annual Action Plan for 2014-2015. It outlines activities of two (2) major formula grants: Community Development Block Grant (CDBG) and Home Investment Partnerships Program (HOME). In FY 2014-2015, the City anticipates receiving **\$325,648** in CDBG funds and **\$159,653** in HOME funds. Additionally, the City will have available approximately **\$443,515** in prior year CDBG

funds and **\$34,563** in prior year HOME funds (prior year balances as of March 19, 2014); **\$23,386** in local matching funds required for the HOME program; and **\$26,689** in CDBG and HOME program income. The City also anticipates \$435,500 in resources as leveraging from private financial institutions and lenders, Habitat for Humanities of Goldsboro-Wayne County, and North Carolina Housing Finance Agency to name a few, which will continue to support the City's affordable housing initiatives by making available advantageous mortgage programs that assist low-to-moderate income residents to become first-time homebuyers. Jurisdictions participating in the HOME program are required to make contributions to housing that qualifies as affordable housing. During a fiscal year, the contributions or match must total not less than 25 percent of the HOME funds drawn from the jurisdiction's HOME Investment Trust Fund Treasury account in that fiscal year for project costs, unless the participating jurisdiction has received a reduction in the match requirement. The City appropriates funds required to match HOME project costs annually. When the City reimburses itself for eligible HOME expenditures, the City draws the sum of total expenditure minus required match so that the City's required HOME match is realized when funds are drawn from the Treasury. At least 70% of all CDBG funds spent will meet the LMI benefit test within a three-year period.

Anticipated Funding & Source	CDBG	HOME	City Funds	Total
2014-2015 CDBG Program Funds	\$325,648			
CDBG Program Income	\$21,870			
CDBG Prior Year Funds	\$443,515			
2014-2015 HOME Program Funds		\$159,653		
HOME Program Income		\$4,819		
HOME Prior Year Funds		\$34,563		
City Match Funds for HOME			\$23,386	
TOTALS	\$791,033	\$199,035	\$23,386	\$1,013,454

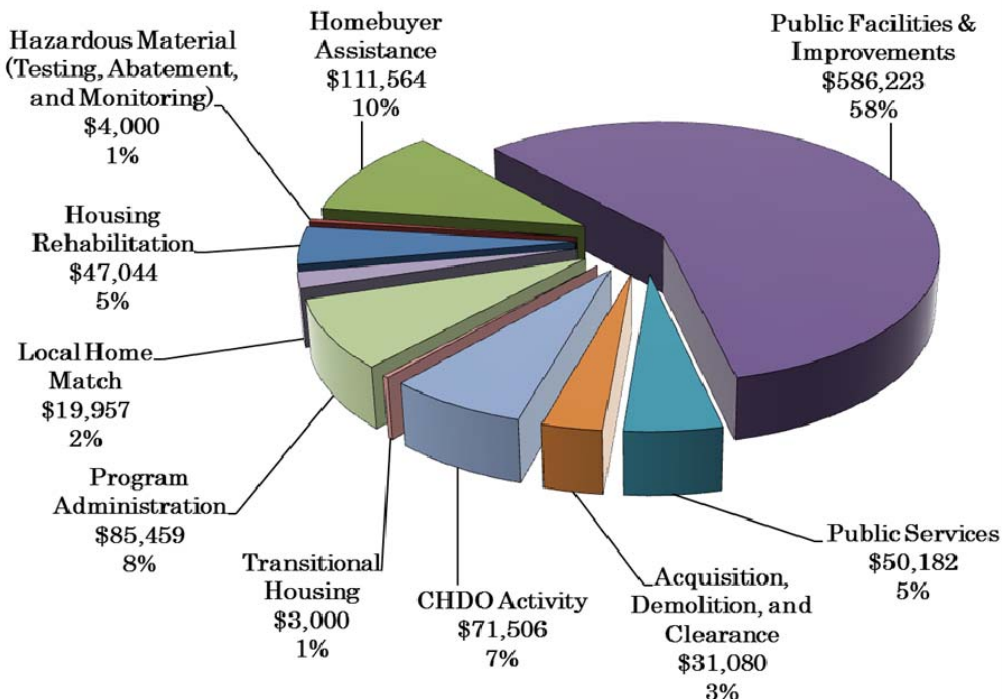


The 2014-2015 Action Plan budget is illustrated on the top and the next page to show the City's proposed use of 2014-2015 allocations of CDBG and HOME funds. Loan repayments (program income) is added to the budget as well as required HOME match funds from the City's general funds budget.

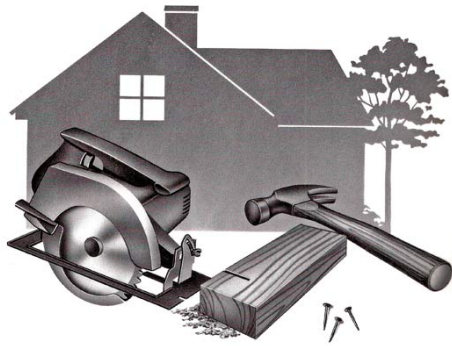
ANNUAL OBJECTIVES (91.220 (c) (3))

It is the mission of the City of Goldsboro to preserve its existing housing base, enhance ownership opportunities for all of its citizens to obtain decent housing, and provide a quality environment, which is conducive to the safe and healthy growth of its citizenry, in accordance with HUD regulations. **City's 2014-2015 Action Plan cycle is July 1, 2014 to June 30, 2015.**

ACTIVITY	CDBG	HOME	PROGRAM INCOME		PRIOR YEAR FUNDS (As of 4-29-14)		TOTAL RESOURCES
			CDBG	HOME	CDBG	HOME	
Housing Rehabilitation	25,537		14,215		7,292		47,044
Hazardous Material (Testing and Monitoring)	4,000						4,000
Homebuyer Assistance		109,145		2,419			111,564
Public Facilities & Improvements	150,000				436,223		586,223
Public Services	46,901		3,281				50,182
Acquisition, Demolition, and Clearance	31,080						31,080
CHDO Activity		34,543		2,400		34,563	71,506
Transitional Housing	3,000						3,000
Program Administration	65,130	15,965	4,374				85,469
Local Home Match		19,957					19,957
Total Allocations	\$325,648	\$179,610	\$21,870	\$4,819	\$443,515	\$34,563	\$1,010,025



1. Homeowner Rehabilitation



Budget:	\$47,044 (Breakdown on page 5 chart)
Activity:	Housing Rehabilitation
Funding Source:	CDBG
Matrix Code:	14A Rehab; Single-family
National Objective:	Low/Mod Housing Benefit
Eligibility Citation:	24 CFR Part 570.202 (a)(i)
Objective:	Provide Decent Housing
Outcome:	Sustainability
Proposed accomplishments:	6 units rehabilitated

This activity is design to assist low-to-moderate-income (LMI) households, as defined by HUD, with rehabilitating existing housing structure. Assistance will be provided in the form of loans with zero percent deferred loans provided to eligible extremely low, and very low, income households (<30% to 50% of AMI); zero percent payable loans provided to eligible low income households (51% to 80% of AMI); and two percent payable loans provided to eligible moderate income households (81% to 95% of AMI). Rehabilitation of the City's aging housing stock is geared towards ensuring the continued livability and viability of Goldsboro's limited affordable housing units. Consequently, all housing rehabilitation activities are performed in conjunction with the hazardous material activity; which focus on lead-based paint and asbestos abatement. Activity costs incurred may include, but are not limited to, roof repair/replacement; electrical and plumbing repairs; handicapped modifications; interior and exterior structural repairs; heating and cooling systems replacements; and all minimum housing code violations.

2. Hazardous Material (Testing and Abatement)

Budget:	\$4,000 (Breakdown on page 5 chart)
Activity:	Housing Rehabilitation
Source:	CDBG
Matrix Code:	14I Lead Test/Abatement
National Objective:	Low/Mod Housing Benefit
Eligibility Citation:	24 CFR Part 570.202
Objective:	Suitable Living Environment
Outcome:	Sustainability
Proposed accomplishments:	15 units tested/monitor



During the course of most housing rehabilitation activities, it is likely that paint surfaces and/or asbestos containing material will be disturbed. The City conforms to federal and state mandates established for HUD funded programs, including Housing Rehabilitation Program; to incorporate lead-based paint and asbestos hazard evaluation, remediation/reduction strategies and clearance requirements for all housing structures built before 1978. Therefore, to reduce

the potential for adverse health effects attributable to the rehabilitation of deteriorated lead-based paint and asbestos containing material surfaces, the City provides educational material to all rehab customers. In addition, the City provides lead-based paint and asbestos inspections, risk assessments, abatement, and clearance in conjunction with housing rehabilitation activities. Project Managers, who oversee housing rehabilitation projects, are trained to incorporate proper hazard reduction techniques into the treatment of lead-based paint and asbestos containing material. This activity is designed to assist low-to-moderate-income (LMI) households, as defined by HUD.

3. Homebuyer Assistance



Budget:	\$111,564 (Breakdown on page 5 chart)
Activity:	Homebuyer Assistance
Funding Source:	HOME
Matrix Code:	Homebuyer
National Objective:	Low/Mod Housing Benefit
Eligibility Citation:	24 CFR Part 92.205 (a)(1)
Objective:	Provide Decent Housing
Outcome:	Affordability
Proposed accomplishments:	6 first-time homebuyers

The City of Goldsboro will use HOME funds and program income to provided direct-subsidy assistance to low-to-moderate income individuals and families to become homebuyers. It is the City's intent to increase the supply of affordable housing units over an extended period of time. The City's Homebuyer Assistance program will provide up to \$30,000 in down payment and closing costs assistance associated with the purchase, through the means of acquisition or new construction, of a single-family dwelling and for principal reduction to increase buyer's affordability. This assistance will be provided directly to the homebuyer or passed thru from developer assistance from the City's designated CHDOs in the form of zero percent deferred second mortgage loans. In the event, that HOME funds are used for the cost of developing a property through the City's designated CHDO (i.e., Habitat for Humanity of Goldsboro-Wayne, Inc.) and the unit is sold below fair market value the difference between the fair market value and the purchase price is considered to be directly attributable to the HOME subsidy. All HOME-assisted homebuyers will be required to have an initial purchase price that does not exceed 95 percent of the median purchase price for the area, occupy the home as their primary residence, and subject to recapture provisions.

The City of Goldsboro will use the HUD Recapture Provisions for its Homebuyer Assistance program to ensure that the amount of HOME funds provided directly to homebuyers are imposed for the duration of the period of affordability and are mandated to recapture provisions per 24 CFR 92.253(a)(5)(ii). This restriction is enforceable by a written Grant Agreement, Promissory Note, and Deed of Trust with the homebuyer. If the original

homebuyer remains in the home for the full period of affordability, no recapture provisions apply. However, if the premises are sold, cease to be the Homebuyer's primary residence, or there is any change in the title during the term of the Grant Agreement, Promissory Note and Deed of Trust, which commences upon the Completion Date, or the Homebuyer is not in substantial compliance with the Grant Agreement, Promissory Note and Deed of Trust and Mortgage, the City of Goldsboro will recapture the full HOME direct-subsidy assistance, which will be the amount remaining on the affordability period at time recapture is trigger; to include, any payments made or pro rata reduction amount applied during the affordability period. For example, a homebuyer receives \$20,000 in HOME direct-subsidy assistance to purchase a home with an initial purchase price that does not exceed 95 percent of the median purchase price for the area. The total HOME direct-subsidy of \$20,000 would require a 10-year period of affordability. If the homebuyer sells the housing unit year 5 of the 10-year period of affordability, then the City would forgive 50 percent of the HOME direct-subsidy and recapture 50 percent of the HOME direct-subsidy, which is \$10,000 of the \$20,000 HOME Investment, assuming that there are sufficient net proceeds available. If, however, the net proceeds are insufficient to repay both the HOME direct-subsidy assistance and the Homebuyer's investment, the City will recapture the net proceeds less the Homebuyer's investment. HUD defines the net proceeds as the sales price minus the loan repayments and closing costs. Under no circumstances will the City of Goldsboro recapture more than is available from the net proceeds of the sale. During the recapture restriction period, the original homebuyer will be entitled to any increase in value that remains after all debts are repaid, including the Homebuyer Assistance program deferred second mortgage loan, with the following provisions to be incorporated into the Grant Agreement, Promissory Note and Deed of Trust.

- 1. Period of Affordability under Recapture Provision:** The period of affordability is based upon the direct HOME subsidy provided to the homebuyer that enables the homebuyer to purchase the unit. Any HOME program income used to provide direct assistance to the homebuyer is included when determining the period of affordability. The City of Goldsboro will not require the original HOME-assisted homebuyer to sell the housing unit to another low-income homebuyer. The homebuyer can sell the property to any willing buyer during the period of affordability, with the understanding that the City's recapture provisions will be enforced.

The following table outlines the required minimum affordability periods.

If the total HOME investment direct subsidy (recapture) in the unit is:	The period of affordability is:
Under \$15,000	5 years
Between \$15,000 and 40,000	10 years
Over \$40,000	15 years
Please be advised that the City of Goldsboro does not provided Homebuyer assistance over \$40, 000.	

2. **Repayment:** Repayment of the Homebuyer assistance deferred second mortgage loan is on a pro rata reduction basis, 20 percent annually for a deferred loan less than \$15,000 and 10 percent annually for a deferred loans \$15,000-\$40,000 if the homeowner owns and occupies the house as the primary residence for the required affordability period. Forgiveness of the full amount of assistance will only occur if the homeowner occupies and retains the property for the full affordability period. No interest shall accumulate on this loan during the affordability period.

If the homeowner refinances the property during the affordability period, which involves a cash/equity out payment this will trigger a repayment. The repayment will be the total amount received through the program as a deferred second mortgage loan minus any payments made or pro rate reduction amount applied during the affordability period. Refinance subordination will only be considered if the refinance results in a reduction of the loan term and/or the lowering of the current interest rate on the first mortgage. In the event of foreclosure by the first mortgage lender, the affordability period will be suspended and will not be binding on that lender. The affordability restrictions shall be revived according to the original terms if, during the affordability period the owner of record before the termination event, or any entity that includes the former owner or those with whom the former owner has or had family or business ties obtains and ownership interest in the property.

If recapture is triggered and there are insufficient net proceeds available at sale to recapture the full pro rata amount due, the City of Goldsboro will not be required to repay the difference between the prorated direct HOME subsidy due and the amount the City is able to recapture from available from net proceeds.

3. **Monitoring:** The City of Goldsboro Community Development Department will be responsible for monitoring HOME-assisted Homebuyers to ensure that the homebuyer owns and occupies the house as the primary residence for the required affordability period on an annual basis. If the Community Development Department does not receive an annual Mortgagee Notice from the HOME-assisted Homebuyer's insurance agency or some form of utility bill or record with homebuyer's name as confirmation that the homebuyer is maintaining the housing unit as their principal residence. The Community Development staff will mail a letter to homebuyer household asking them to sign and return a statement verifying that the property purchased with HOME funds remains their principal residence. If a HOME-assisted homebuyer fails to return the signed statement, staff will follow up to determine if the homebuyer is still residing in the assisted unit.

4. Public Facilities & Improvements

Budget: \$586,223
(Breakdown on page 5 chart)
Activity: Public Facilities & Improvements
Source: CDBG
Matrix Code: Depends on Project Type
National Objective: Low/Mod Area Benefit
Eligibility Citation: 24 CFR Part 570.201 (c)
Objective: Suitable Living Environment
Outcome: Availability/Accessibility
Proposed accomplishments: 2 public facilities projects



This activity is designed to improve the overall infrastructures within low-mod census tract areas within the City limits. Types of Public Facilities & Improvement projects, but not limited to curbing, gutters, and sidewalks along the City's right-of-ways, installation of municipal water and wastewater lines, construction and improvement to sidewalks, and improvements to public parks within low-mod census tract areas. The City plans to utilize 80% or more of the budgeted amount to aid in the construction of a recreational center (WA Foster Recreational Center) within a low/mod census area (Census Tract 15; Block Group 2), which would be located at Mina Weil Park, House Street, Goldsboro, NC.

5. Public Services



Budget: \$50,182
(Breakdown on page 5 chart)
Activity: Public Services
Source: CDBG
Matrix Code: Depends on Public Service Type
National Objective: Depends on Public Service Type
Eligibility Citation: 24 CFR Part 570.201 (e)
Objective: Depends on Public Service Type
Outcome: Depends on Public Service Type
Proposed accomplishments: 6 public service agencies assisting 2,110 LMI persons

The City of Goldsboro annually sets aside a portion (15%) of its Community Development Block Grant entitlement to fund public service activities provided by local community based organizations and/or non-profits for the benefit of low-to-moderate income residents. Eligible activities include, but not limited to youth services, employment, crime prevention, child-care, health services, housing counseling, and services for battered and abused spouses. The funds are allocated through a competitive process and the Loan Review Committee (LRC) reviews all applications and makes recommendations to the City Council. A total of eleven applications were submitted for funding. The LRC recommended public services grants to the following applicants (see page 11 table and pie chart):

Organization/Agency	LRC Recommendation	Number of LMI to serve	National Objective	Objective	Outcome
Boys & Girls Club of Wayne County	\$13,182	125	Low/Mod Limited Clientele	Suitable Living Environment	Sustainability
Cumberland Community Action (CCCS)	\$5,000	50	Low/Mod Limited Clientele	Provide Decent Housing	Affordability
Literacy Connections of Wayne County	\$7,000	370	Low/Mod Limited Clientele	Create Economic Opportunities	Sustainability
Rebuilding Broken Places, CDC	\$3,000	25	Low/Mod Limited Clientele	Provide Decent Housing	Affordability
Wayne Community College (WCC)	\$7,000	40	Low/Mod Limited Clientele	Create Economic Opportunities	Sustainability
Wayne Initiative for School Health (WISH)	\$20,000	1,500	Low/Mod Limited Clientele	Suitable Living Environment	Affordability
	<u>\$50,182</u>	<u>2,110</u>			

It should be noted that CCCS will be funded by HOME fund; therefore, the \$5,000 awarded will not be included in the Public Services 15% Cap.

Boys & Girls Club of Wayne County

Street SMART – Gang Awareness & Prevention Program

Cumberland Community Action (CCCS)

Comprehensive Homeownership Education & Counseling

Literacy Connection of Wayne County

Literacy Education

Rebuilding Broken Places, CDC

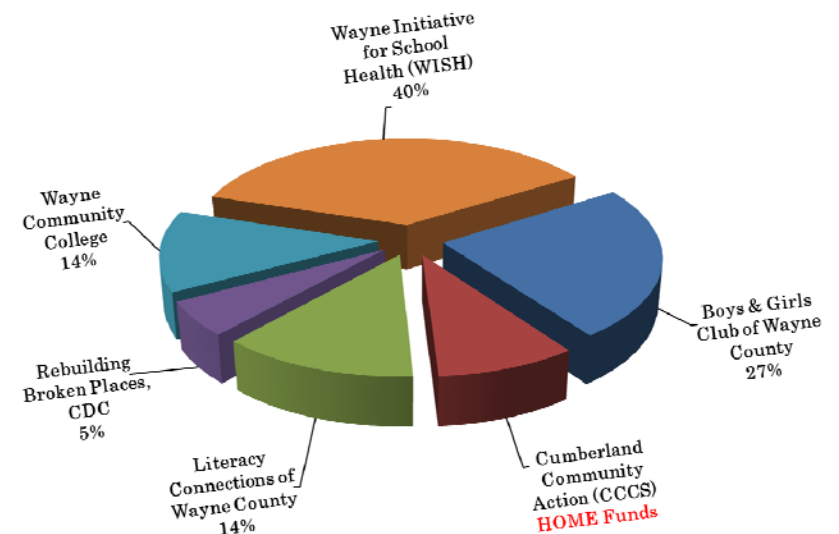
Project Y.E.S.S. – Afterschool Program

Wayne Community College (WCC)

WORKS Program – Intro to Manufacturing Process and Customer Service

Wayne Initiative for School Health (WISH)

Comprehensive Health Service Program



6. Acquisition, Demolition, and Clearance

Budget: \$31,080
(Breakdown on page 5 chart)
Activity: Demolition and Clearance
Source: CDBG
Matrix Code: 04 Clearance and Demolition
National Objective: Low/Mod Area Benefit
Eligibility Citation: 24 CFR Part 570.201 (d)
Objective: Suitable Living Environment
Outcome: Sustainability
Proposed accomplishments: 6 substandard and dilapidated housing units demolished



The City of Goldsboro will demolish vacant substandard and dilapidated housing units that are not economically feasible for rehabilitation, which poses as slum and blight conditions within low-mod census tract areas. The City does not anticipate there being any tenants to relocate, since the housing units targeted are vacant substandard and dilapidated housing units. However, if there are tenants that are displaced due to demolition and clearance projects by the City, relocation assistance will be provided per Uniform Relocation Assistance regulations.

7. CHDO Activity



Budget: \$71,506
(Breakdown on page 5 chart)
Activity: CHDO Activity
Source: HOME
Matrix Code: Homebuyer
National Objective: Low/Mod Housing Benefit
Affordable Housing
Eligibility Citation: 24 CFR Parts 92.205 & 300
Objective: Provide Decent Housing
Outcome: Affordability
Proposed accomplishments: 2 affordable single-family homes constructed

Community Housing Development Organizations (CHDO) are nonprofit organizations whose purpose is to provide decent and affordable housing for low-to-moderate-income individuals and/or families. The City is required to set aside a minimum of (15%) of its HOME funds for CHDO activities that focus on housing development activities in which qualified CHDOs are the owners, developers and/or sponsors of the housing. . Currently the City has two certified CHDOs: Habitat for Humanity of Goldsboro-Wayne, Inc. and Rebuilding Broken Places, CDC.

Eligible uses of HOME funds by a CHDO

With the City's approval, CHDOs may use HOME funds for eligible HOME activities. However, only certain types of activities count toward the minimum 15% set-aside requirement.

- Eligible set-aside activities include the following when carried out by a CHDO acting as an owner, sponsor, or developer:
 - ✓ Acquisition and/or rehabilitation of rental housing;
 - ✓ New construction of rental housing;
 - ✓ Acquisition and/or rehabilitation of homebuyer properties
 - ✓ New construction of homebuyer properties; and
 - ✓ Direct financial assistance to purchasers of HOME-assisted housing sponsored or developed by a CHDO with HOME funds.

8. Transitional Housing

Budget:	\$3,000 (Breakdown on page 5 chart)
Activity:	Transitional Housing
Source:	CDBG
Matrix Code:	14J Housing Services
National Objective:	Low/Mod Housing Benefit
Eligibility Citation:	24 CFR Part 570.201 (k)
Objective:	Suitable Living Environment
Outcome:	Availability/Accessibility
Proposed accomplishments:	4 households will receive transitional housing assistance



The City of Goldsboro will fund Wayne Uplift Resource Association, Inc. as a subrecipient to assist households who are in need of transitional housing as result of fleeing a domestic violence situation. The transitional housing funds will allow four (4) households to receive housing assistance including rental and/or utility assistance, security deposits, furnishing, and other incidentals related to relocating to a safe housing unit.

Qualified and experienced program staff will provide an array of victim-centered support services design to enable households to secure permanent housing and integrate back into the community. These services will include case management, employment counseling, information/referral, and transportation. The City's transitional housing activity is a housing service in support of the HOME program; although, funding source is directly from CDBG.

9. Program Administration



Budget:	\$85,469 (Breakdown on page 5 chart)
Activity:	HOME Program Admin CDBG Program Admin
Source:	CDBG and HOME
Matrix Code:	21A - General Program Admin AD/CO/CC Only
National Objective:	N/A
Eligibility Citation:	24 CFR Parts 570.206 & 92.207
Objective:	N/A
Outcome:	N/A
Proposed accomplishments:	N/A

Administrative costs that are necessary for program planning and management of the CDBG and HOME programs are charged to program administration. The Planning and Community Development Department is responsible for ensuring program implementation in compliance with national objectives of both programs as well as adherence to state and local requirements.

Reasonable administrative and planning costs include, but are not limited to:

- General management, oversight and coordination
- Salaries, wages and related costs of the participating jurisdiction's staff
- Monitoring progress and compliance with program requirements
- Preparing reports and other documents related for submission to HUD
- Coordination of audit and monitoring findings resolutions
- Evaluation of program results against stated objectives
- Travel costs incurred for official business in carrying out the program
- Administrative services performed under third party contracts or agreements
- Capacity building and training activities for staff and non-profits
- Fair housing and activities to affirmatively further fair housing

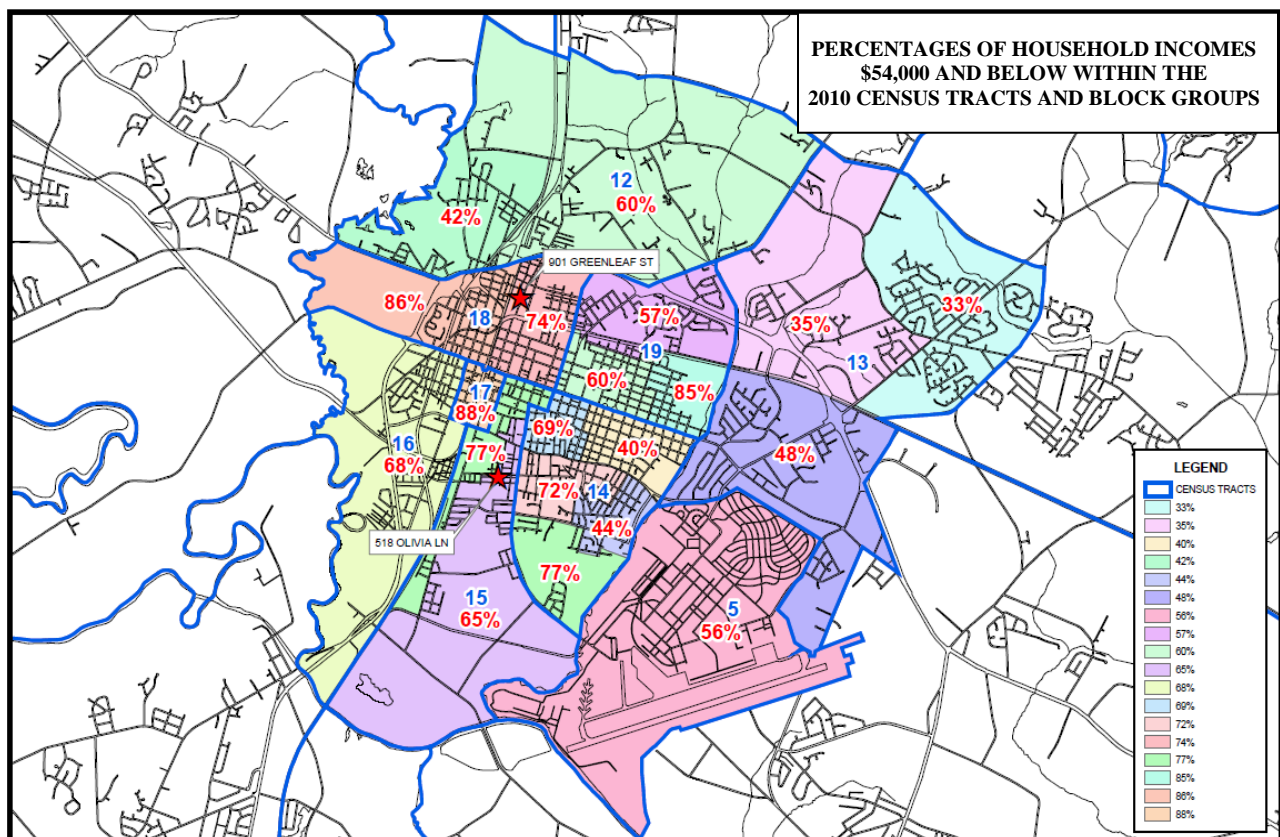
HUD regulations permit the City to use up to twenty (20) percent of the CDBG grant and up to ten (10) percent of its HOME grant for reasonable administrative and planning costs.

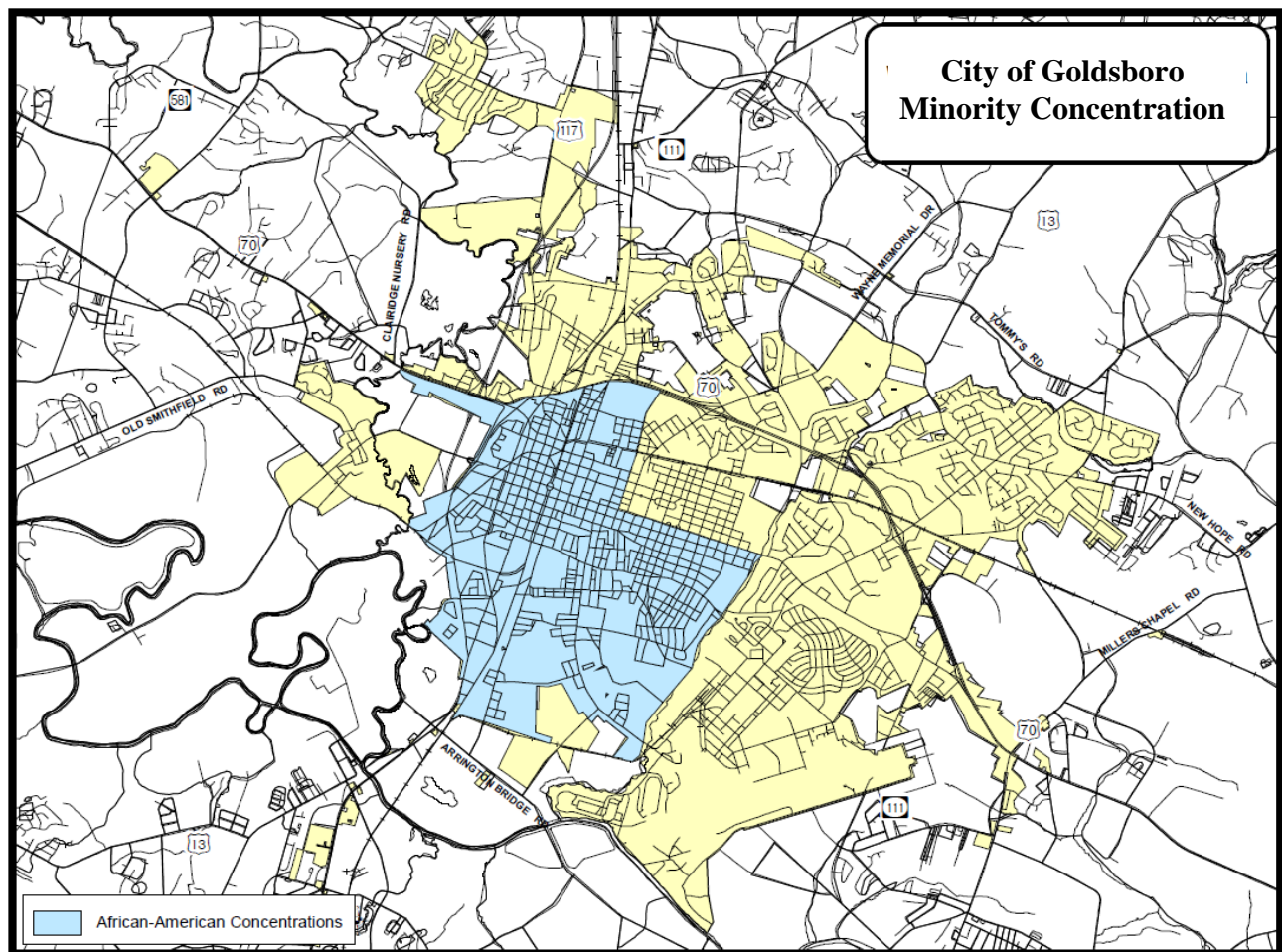
GEOGRAPHIC DISTRIBUTION/ ALLOCATION PRIORITIES (91.220 (d) and (f))

Incorporated in 1847, the City of Goldsboro is the largest municipality in Wayne County with a land area of approximately 27.2 square miles and an estimated population of 36,437 according to U.S. Census Bureau 2009-2011 American Community Survey. In a effort to development viable urban communities, provide decent affordable housing, suitable living environment, and expanding economic opportunities to low-to-moderate income (LMI) households the City's CDBG and HOME funds will be directed to assist LMI residents citywide. This strategy will enable the City to geographically disburse CDBG and HOME funds to census tracts and block groups, where the low-to-moderate income (LMI) households is 51% or more of the Area Median Income (AMI)

and is minority concentrated. However, eligible persons from all racial, ethnic, and gender groups are given the opportunity to apply and receive funding if their households' earnings meet eligibility criteria for the City's CDBG and HOME- funded projects. African-Americans are the predominant minority within Goldsboro with 19,786 persons (54.3%) of the total population. Whites make up (39.2%) of the population with 14,295 and Hispanics make up (4.3%) of the population with 1,583, while all other races comprising (2.2%) with 773 persons. Minority households are located south of Ash Street and west of Seymour Johnson Air Force Base; the northwest portion of the City bordered by Ash Street, Highway 117, and US Highway 70 Bypass; and Census tracts 14, 15, 16, 17 and 18. Each of these Block Groups have a high concentration of African-American persons well close to the City's average of (54.3%). According to the U. S. Census Bureau 2009-2011 American Community Survey, 8,672 persons (24%) of the total population of the City of Goldsboro live below the poverty line.

Due to concentration of minority and low-to-moderate income households within census tracts and block groups showed below, the City has historically targeted communities and families in those areas. There are significant residential uses which exist in these LMI areas and violent crime has historically been pervasive but significant impact has been made by the City Police Department's uniformed patrol division consists of four shifts on a rotating schedule. The City's LMI census tract and block group areas have a large number of vacant lots and boarded up homes that are a blighting influence. In recent years, the City has made a concerted effort to demolish substandard houses that contribute to blight in the targeted areas. It should be noted, that at least 80% of all CDBG funds and 100% of all HOME funds will be spent to meet the LMI benefit test within 2014-2015 Action Plan cycle.





ANNUAL AFFORDABLE HOUSING GOALS (91.220 (g))

Several characteristics of the housing market in Goldsboro directly impact provision of affordable housing. A large percentage of owner-occupied housing belongs to low-to-moderate income families who do not have the resources to rehabilitate deteriorating conditions. Landlords operating on a narrow profit margin are unlikely to invest substantial amounts of money into property upkeep unless forced to do so by local housing code enforcement. Potential homebuyers also face a lack of decent, affordable housing options. The past economic downturn has further damaged the ability of many families to save money and secure financing. Neighborhood revitalization and stability and the production and conservation of affordable housing are the major goals of the City of Goldsboro. The City will direct a combination of federal, state, and local funds toward the achievement of these goals by funding single-family rehabilitation, new construction, infrastructure, and homebuyer assistance.

Many low-to-moderate income (LMI) individuals and families find that banks are not willing to take the risk of lending to them. As CHDOs, Habitat for Humanity of Goldsboro-Wayne, Inc. and Rebuilding Broken Places, CDC will construct, sell, and/or rent affordable housing units to LMI households through CHDO Set-aside HOME funds of \$71,506 and Homebuyer Assistance funds of \$30,000. Goldsboro Development Corporation, once a designated CHDO, provides

affordable rental units to LMI renters. To date, Goldsboro Development Corporation, Inc. has purchased, renovated, and rented a total of sixteen (16) dwellings to LMI families. These dwellings have proven to be a great asset for LMI renters. All of the units are rented under the Section 8 guidelines and fair market rental rates. The City of Goldsboro and Goldsboro Development Corporation will continue to maintain the current stock of affordable rental units through routine scheduled inspections and repairs as needed.

Worst-Case Needs. Worst-case needs are defined as unassisted renters with very low incomes (below 50% AMI) who pay more than half of their income for housing or live in substandard housing. They are addressed by moderate rehab, acquisition, new construction, substantial rehab, and infrastructure provision for projects serving several target populations. In response, the City of Goldsboro in 2011 and 2012 fiscal years invested \$131,250 in HOME funds and \$18,750 in local match funds from the City's General Fund each year to construct a 60-unit rental affordable housing development for seniors, through the Highlands of Goldsboro, Inc. Sixteen (16) units will be affordable to low-income seniors earning at or below 30 percent of the Area Median Income (AMI) for Goldsboro; and 44 units will be affordable to low-income seniors earning at or below 50 percent of the AMI for Goldsboro to serve those population, all as calculated under the requirements of Section 42(I)(2)(E) of the Internal Revenue Code of 1986, as amended, and 24 CFR Section 92.216 will be made available to for renters

PUBLIC HOUSING (91.220 (h))

The City has two public housing managing agencies: Goldsboro Housing Authority and Eastern Carolina Regional Housing Authority. Both public housing authorities received funding for their housing activities, projects, and funds to modernize and repair their public housing units. Goldsboro Housing Authority owns and manages 1,225 units throughout the local area and Eastern Carolina Regional Housing Authority manages 180 units.

The City of Goldsboro actively encourages the cooperation of regional and local public and private agencies/parties by providing resources, technical assistance, and venues through which the exchange of ideas promoted positive community outcomes. In continuing this ongoing effort, the City adopted the following initiatives for which the City will coordinate and optimize the efforts of the public housing authorities that participated in the implementation of the City's five-year strategy and/or Annual Action Plan:

- 1) The City will support the efforts of the Authorities in maintaining the integrity of the public housing inventory to provide safe, decent, and affordable housing opportunities for qualifying residents. The City will provide technical assistance to the public housing authorities that apply for grants to continue rental assistance programs that provide decent affordable housing opportunities for the City's low-income residents.
- 2) The City's Community Affairs and Community Development staff will work with the Executive Board and act as a liaison between the Goldsboro Housing Authority and the Resident Council. The City's Community Affairs and Community Development staff will provide on going support to the Resident Council in two of the Goldsboro Housing Authority residence councils. Support includes guidance, educating, reviewing and recommending changes to the by-laws, scheduling the election date, election process,

assistance with the candidate's forum and flyers. Public Housing tenants will be given information on landlord /tenant rights, the City's Homebuyer Assistance program, and invited to all of the City's Fair Housing workshops.

- 3) The City will work with employees and residents of the Goldsboro Housing Authority and the Eastern Carolina Regional Housing Authority to increase homeownership opportunities for the residents of public housing. Many residents apply for assistance, but due to credit issues, their loans are not approved. For this reason, the Planning and Community Development Office will be assisting residents/applicants in locating agencies that are available for financial management and counseling as well as providing some counseling in our office. A contract will be signed with Consumer Credit Counseling Service of Fayetteville, Inc., Goldsboro Branch, to provide homebuyer education and financial management and budgeting sessions, when needed, at no cost to the applicant.

HOMELESS AND SPECIAL NEEDS (91.220 (i))

Eastpointe LME is the lead agency for the Continuum of Care, the Down East Coalition to Eliminate Homelessness, and services the Goldsboro/Wayne county area as well as Lenoir, Sampson, and Duplin counties. Since 2010, the City has been an active member of the Continuum of Care Task Force, a coalition of homeless service providers, shelters, and Faith-based organizations to develop a meaningful Continuum of Care plan to reduce homelessness. Each year, since 2007 the Coalition has applied and utilized Shelter Plus Care (SPC) rental assistance program, a tenant-based rental assistance program for homeless individuals and families with disabilities, HIV/AIDS, and substance abuse problems. 2014 Point in Time Count was conducted on January 29, 2014 and revealed that there are 12 homeless persons in Wayne County unsheltered. However, the Coalition believes that number is much higher. Due to limited volunteers this year, the Coalition was unable to obtain an accurate Point in Time Count.

The Coalition will disburse SPC funds on the projection of a specified number of leases at the maximum allowable cost. Funds saved by negotiating lower rents, obtaining reimbursements for deposits, and avoiding unnecessary for damages or vacated units, will be available to provide rental assistance for additional homeless individuals and families with disabilities, HIV/AIDS, and substance abuse problems.

The “**shelter**” aspect of the program is the monthly rental subsidy paid directly to the property manager/landlord. The “**care**” component of the program means accessible to and availability of long-term community-based supports (i.e., case management, medical care, community referrals and follow-up, crisis intervention, in-home visits, and assistance with obtaining Person Centered Services for the entire time the individual or family remains in the program).

Priority Homeless Needs Based on public input and input from area non-profit organizations, the following homeless needs and concerns were identified:

- ◆ Transitional housing for families
- ◆ Transitional housing for battered women and their children
- ◆ Emergency shelter housing for homeless women

- ◆ Emergency shelter housing for families
- ◆ Emergency shelter (possibly seasonal) for chronically homeless substance abusers and dually diagnosed persons
- ◆ Transportation – transit needs to be broadened, hours extended
- ◆ There is a need for drug and alcohol treatment facilities for women
- ◆ More supportive services (Case Management) for those with special needs, chemical dependencies, etc.
- ◆ Education and job training
- ◆ Counseling for families and individuals with credit and other housing needs child care

In FY 2014-2015, the City of Goldsboro will fund \$3,000 to Wayne Uplift Resource Association, Inc. as a subrecipient to assist households who are in need of transitional housing as result of fleeing a domestic violence situation. The transitional housing funds will allow four (4) households to receive housing assistance including rental and/or utility assistance, security deposits, furnishing, and other incidentals related to relocating to a safe residence. In addition, the Continuum of Care, the Down East Coalition to Eliminate Homelessness has applied for \$99,144 in rental assistance under the Shelter Plus Care Grant #2 Renewal to be utilized during FY 2014-2015 for twelve (12) target units to house additional homeless individuals and families with disabilities, HIV/AIDS, and substance abuse problems

The City of Goldsboro has four (4) homeless shelters and these shelters offer emergency, transitional housing, and/or supportive services. Persons with HIV/AIDS in Goldsboro will be referred to the Wayne County Health Department for follow up. The Wayne County Health Department refers HIV/AIDS clients to private medical providers in Wayne County or to the infectious disease clinic at the East Carolina School of Medicine. Currently in Wayne County, Community Links Inc. provides HIV case management that includes education counseling, emergency housing and medication assistance. The Wayne County Health Department's HIV/AIDS task force works in partnership with the NC HIV/STD Prevention and Care Branch and the East Carolina HIV/AIDS Partnership (ECHAP) to ensure that assistance to community based organizations and those affected and infected are aware of available training, education, testing, and financial assistance to prevent the spread of HIV/AIDS.

Numerous community-based agencies provide ongoing services to homeless individuals and families and those nearing homelessness. These include the Wayne Uplift Resources Association, Churches in Action, Last Resort Mission, United Church Ministries, Wayne Action Group of Economic Solvency (WAGES), W.A.T.C.H., Wayne Community College Literacy Department, Wayne Memorial Hospital, and Community Soup Kitchen. Each of these agencies are part of a network to help homeless individuals and families through their crisis situations and move onto permanent housing, employment and healthy living situations. Goldsboro Housing Authority provides conventional public housing, Section 8 certificates, and Section 8 vouchers for low-income families threatened with homelessness. Additionally, the Eastern Carolina Regional Housing Authority administers Section 8 vouchers within the City, as well.

During the 2014-2015 program year, the City of Goldsboro intends to take the following actions to assist with ending chronic homelessness and special needs populations:

- Assisting homeless providers with the development of more emergency and transitional housing, primarily for families
- Assisting agencies that serve special populations to locate safe, decent, and affordable permanent housing
- Assisting agencies and homeless providers in the development of a Continuum of Care Plan, which will identify the specific nature of homelessness in the Goldsboro area, gaps in services, and the services needed to meet those needs
- Assisting homeless agencies to provide transportation services to allow homeless persons and families to access needed services

Based on national averages, it is estimated that 5% of the older adult population will need long-term institutional care during their lives. That translates into 265 older adult persons in Goldsboro that will, on average, need housing with care. The numbers of long-term care beds seems to indicate adequate housing options for older persons.

Within Wayne County, there are 480 nursing home beds, 757 adult care home beds, and 36 family care home beds. Increasing or decreasing the number of these beds is beyond the scope or purpose of the Consolidated Plan, but it is important to note the number of long-term care beds is likely to remain the same; whereas, the older adult population is the fastest growing segment of the population. Many older adults will face housing problems as they age and remain in their homes. Home modifications and adaptations are often necessary to help older adults remain independent.

The City of Goldsboro has five (5) elderly subsidized apartment developments, Waynesborough House, Greenleaf Grace Village, Walnut Street Apartments, Kirkwood Retirement Village, and Poplar Street Apartments. There are two (2) non-subsidized apartment developments, Huntington Manor Apartments and Heather Dawn Estates. The Goldsboro Housing Authority has 100 designated elderly units with 217 units of the total housing authority units being occupied by the elderly. Goldsboro Housing Authority also administers Section 8 vouchers, with 49 provided to the elderly. Eastern Carolina Regional Housing Authority has 61 units occupied by the elderly.

The Jacob House/Zodack House provides drug and alcohol rehabilitation treatment in a residential setting. Their program lasts 12 to 18 months. However, Eastpointe, LME is the primary source for assistance for individuals and families with alcohol and drug related problems. This includes programs related to excessive or abusive use of alcohol and/or other drugs. Programs are designed to meet the special needs of adults, children, and adolescents, family members, which may be court-ordered treatment. Eastpointe, LME provides services to substance abusers in Wayne, Lenoir, Duplin, and Sampson counties. They state a need for a substance abuse treatment facility, housing for those receiving treatment and community-based prevention programs.

In addition, Eastpointe LME is the primary agency providing supportive services for the developmentally disabled. The department provides financial aid and other life essential services. There is a need for a facility for clients to provide intensive supervision and monitoring capabilities. The current housing options for persons with developmental disabilities are with

their families, family care homes, group homes, rest homes, or nursing homes; depending on the degree and severity of the disability. This population needs specialized housing and care arrangements. As with other disabled persons, this population's needs range from an ongoing need for supervised housing for the mentally ill, affordable housing for those who can be mainstreamed into the community, job training programs, transportation, medical care, and social opportunities.

There are approximately 48 group homes for developmentally disabled adults and children in Wayne County licensed by the NC Division of Health and Human Services. Cherry Hospital is a 403-bed inpatient psychiatric hospital serving the citizens of 33 eastern North Carolina counties operated by the State of North Carolina, Department of Health and Human Services. Likewise, the O'Berry Center is a state-run residential facility for persons with intellectual and developmental disabilities. Like skilled nursing homes facilities, expanding or decreasing the number of beds or scope of these services is beyond the scope of the Consolidated Plan. The City will continue its single-family rehabilitation program and provide the necessary home repairs and modifications for elderly and disabled homeowners to help those persons remain in their homes and independent as long as possible. The City will continue to support the efforts of private developers and non-profit agencies that build affordable multi-family rental units for special needs populations.

BARRIERS TO AFFORDABLE HOUSING (91.220 (j))

The City recognizes the challenge faced by low-to-moderate income households to find housing they can afford in Goldsboro's housing market and has taken specific steps to address that challenge. The City will continue to support housing, through its CHDO and Homebuyer Assistance activities, that is attractive, well managed, and geographically dispersed throughout the community. The City is committed to funding CHDOs that produce housing units that are well designed and are an attribute to the surrounding community.

As part of the certification to affirmatively further fair housing, HUD requires the City to conduct an analysis of impediments to fair housing choice within its jurisdiction and take appropriate actions to overcome the effects of any impediments identified through that analysis. The current Analysis of Impediments (AI) was completed in Spring 2008. Please be advised that the City is currently working with a consultant, ASK Development Solutions, Inc. to complete the new Analysis of Impediments (AI) to be made available no later than January 2015. The City of Goldsboro's Community Development and Community Affairs Departments are responsible for the advancement of human/civil rights issues such as fair housing, equal employment, unfair treatment, and equal access to public services/accommodations. The Community Affairs Department will continue to serve as the official designated City department responsible to receive, investigate, and mediate complaints of discrimination, such as fair housing.

In addition, the Community Affairs Department is charged with maintaining positive human relations for this jurisdiction through programming, civic engagement, conflict resolution, and peaceful solutions. The City has a Comprehensive Fair Housing Strategy; the goal is to eliminate discrimination and unfair treatment in the provision of sale and rental housing in the Goldsboro area. The City also maintains printed material, including state and federal contact information, in English and Spanish, for persons needing assistance with private fair housing

grievances. The City will conduct an end of year survey to determine effectiveness of strategies and fair housing education and awareness activities to remove barriers of fair affordable housing.

Affirmatively Furthering Fair Affordable Housing FY 2014-2015 Plan

Impediment 1: Lack of Fair Housing Awareness and Education

Goal: To increase and education of Fair Housing laws

Plan of Action: During National Fair Housing Month, the Community Affair and Community Development Department will collaborate with community groups, realtors, and lenders to provide two (2) educational forums to highlight and embed the important of fair housing. The Community Development Department will provide \$5,000 in CDBG funds to the Goldsboro Branch Office of Consumer Credit Counseling Services of Fayetteville (CCCS) to provide bi-monthly (6) first-time homebuyer workshops using the HUD-approved curriculum, *NFCC Keys to Home Ownership* for fifty (50) low-to-moderated income individuals on pre-purchasing, credit counseling, and homebuyer education. The City will continue to assist citizens with any complaints and make appropriate referrals.

Impediment 2: Low Inventory of Housing for the Disabled and Other Special Populations

Goal: To increase availability of housing for the disabled and other special populations

Plan of Action: The City of Goldsboro Community Development Department will be an active member of the Continuum of Care, the Down East Coalition to Eliminate Homelessness, which meets monthly. The City will collaborate with Eastpointe, LME and other service providers to connect persons with specific disabilities and/or homelessness to acquire housing.

Impediment 3: Affordability

Goal: To increase availability of housing for the disabled and other special populations

Plan of Action: The City will utilize a total of \$111,564 in HOME funds and \$13,643 in local funds to provide direct-subsidy assistance in the form of zero percent deferred second mortgages towards down payment and closing cost for six (6) eligible homebuyers for principal reduction to increase buyer's affordability to purchase a home. The City will provide \$71,506 in CHDO set-aside HOME funds to designated CHDOs to construct, sell, and/or rent affordable housing units to LMI households. As previously stated, the City will provide \$5,000 in CDBG funds to the Goldsboro Branch Office of Consumer Credit Counseling Services of Fayetteville (CCCS) to provide financial and budgeting counseling to fifty (50) low-to-moderated income individuals.

Impediment 4: Mortgage Financing and Disproportionate Number of Subprime Loans for Minorities and Women

Goal: To increase availability of mortgage financing for Minorities and Women

Plan of Action: The City will utilize Consumer Credit Counseling Service (CCCS) to provide financial and credit counseling services to low-to-moderated income minority and women to improve their credit performance and ability to obtain conventional financing. The Community Development Departments will collaborate with the Banking industry to encourage minority and women applicants to apply for Homebuyer Assistance through the Department and/or Habitat for Humanity to increase their chances for conventional financing. In addition, the City will work closely with the Banking industry to address some of these issues and to encourage compliance with the Community Reinvestment Act (CRA) regulations.

Impediment 5: Accessibility

Goal: To increase the accessible housing units for persons with disabilities in rental and homeownership

Plan of Action: The City of Goldsboro will provide \$35,816 under the CDBG Homeowner Rehabilitation Program, to assist six (6) homeowners to make their home more accessible and safe. The City Community Development department has a referral system in place for disable residents to receive assistance through two local organizations to construct handicap accessible ramps and/or other accessible devices.

AFFIRMATIVE MARKETING POLICY & IMPLEMENTATION PROCEDURES (92.351 (a))

I. Affirmative Marketing Policy

In accordance with HOME Rule, 24 CPR Part 92.351, and in furtherance of the City of Goldsboro's commitment to nondiscrimination and equal opportunity in housing the City of Goldsboro hereby establishes procedures to affirmatively market units that are rental, rehabilitated, development projects and/or housing containing five or more HOME-assisted units. Which are funded with HOME or Community Development Block Grant (CDBG) funds and other program services and benefits performed by investor owners, developers, or sub-grant agencies.

The primary purpose of this Affirmative Marketing Policy is to promote a condition in which persons of similar income levels in the same housing market area have available to them a like range of choices in housing, regardless to race, color, religion, familial status, handicap, sex, or national origin. These procedures are intended to further the objectives of Title VIII of the Civil Rights Act of 1968, Executive Order 11063, the State Fair Housing Act (General Statutes of North Carolina, Chapter 41A, and the City of Goldsboro's local Fair Housing Resolution No. 1977-169.

Affirmative marketing steps consist of actions to provide information and otherwise attract eligible persons from racial, ethnic, and gender groups in the market area to available housing. The following Affirmative Marketing Policy describes the procedures the City of Goldsboro will adopt and implement.

II. Implementation Procedures

A. Statement of Policy

The City of Goldsboro believes that individuals of similar economic levels in the same housing market area should have available to them a like range of housing choices regardless of their race, color, religion, sex, and national origin.

The City of Goldsboro is committed to the goals of affirmative marketing. This commitment is evidenced through the efforts of the City of Goldsboro Community Affairs Office, which handles housing related complaints and problems.

The City of Goldsboro hereby sets out a specific set of steps, which will be followed by the City of Goldsboro, participating investors, developers, or sub-grantee agencies.

B. Informing the Public, Potential Tenants, Owners, and Investors about Federal Fair Housing Laws and Affirmative Marketing Policies

Through the Planning and Community Development and the Community Affairs Office, the City of Goldsboro will inform the public, potential tenants, owners, and investors about this Affirmative Marketing Policy and Fair Housing Laws.

The City of Goldsboro Planning and Community Development Department and the Community Affairs Office will:

1. Inform The General Public By:

- a. Advising the public during a Fair Housing Conference in the Month of April, which has been designated Fair Housing Month.
- b. Placing public notices in the local new media and on the City of Goldsboro's website.
- c. Airing regular notices via local radio stations.

2. Inform Potential Tenants By:

- a. Displaying the Fair Housing logo and slogan at various businesses, real estate offices, and buildings scheduled for rehabilitation or construction.
- b. Providing informational flyers about Fair Housing in local businesses, real estate offices, and buildings scheduled for rehabilitation or construction.
- c. Requesting the assistance of the Goldsboro Housing Authority and the Eastern Carolina Regional Housing Authority in informing low-to-moderate income families of available housing offered by the City of Goldsboro.

3. Inform Investors/Owners by:

- a. Mailing notices and letters to property owners who will participate in the program.
- b. Advising program participants during the initial interview of the City's Affirmative Marketing Policy.

C. Requirements for Investor/Owners to Inform the General Renter Public about Available Rehabilitated or Newly Constructed Units

The City of Goldsboro will require project investors/owners to carry out affirmative marketing practices. The City of Goldsboro will require participating investor/owners to contact the City of Goldsboro Planning and Community Development Department, Community Affairs Office, Goldsboro Housing Authority, or Eastern Carolina Regional Housing Authority as soon as they know a newly constructed or rehabilitated property is to become available. Investors/Owners should provide for costs associated with these requirements in their planned operating costs. These notices of vacancy will be handled in strict accordance with this Affirmative Marketing Policy and the investors/owners will be referred to potential renters. The City will require the investor/owner to consider the referral on an equal basis as he/she considers other potential renters without regard to their race, color, religion, familial status, handicap, sex, or national origin.

The investor/owner will also be required to use the HUD Fair Housing logo in any advertisements for vacancy and prominently display and maintain the HUD Fair Housing Poster (HUD-928.1) in all offices in which sales or rental activity take place from the start of construction or rehabilitation, throughout the sales or initial lease-up period.

D. Special Outreach

Through this Affirmative Marketing Policy, special outreach will be made to the racial/ethnic groups who would not likely apply for housing without special outreach. Workshops and seminars will be given and promotional materials will be developed and widely distributed throughout the community. Additionally, the City of Goldsboro will require developers and investors to utilize churches and civic groups in attempting to reach those least likely to apply.

E. Record Keeping

The **City of Goldsboro** will keep records of the following:

- a. Copies of public notices placed in the local newspaper.
- b. Dates potential investors/owners or tenants were supplied copies of the City's Affirmative Marketing Policy and housing information.

The **Investor/Owners** will keep records of following:

- a. The racial, ethnic, and gender characteristics of tenants and applicants in the ninety (90) days following rehabilitation or construction;
- b. Copies of all advertisements for vacancy;
- c. Dates of which the investor/owner contacted the City of Goldsboro Planning and Community Development Department, Community Affairs Office, Goldsboro Housing Authority, or Eastern Carolina Regional Housing Authority concerning vacancies.

F. Assessment of Affirmative Marketing Efforts

The affirmative marketing efforts of investors/owners will be assessed by the City of Goldsboro as follows:

1. To Determine If Good Faith Has Been Made

- a. Examine records required of the investors/owners on actions they have taken and compare them with the actions required herein. If it is found that the required actions have been carried out as specified, it will be assumed they have made good faith efforts to carry out the procedures outlined in this policy.
- b. If one or more groups have not been represented, the procedures will be reviewed to determine what changes, if any, might be made to make the affirmative marketing efforts more effective.

2. To Determine Results

- a. Examine whether or not persons from the variety of racial and ethnic groups in the City of Goldsboro's jurisdiction applied for or became tenants of units that were affirmatively marketed. If it is found that a variety is represented, it will be assumed that the procedures were effective.
- b. If one or more groups are not represented, the procedures will be reviewed to determine what changes, if any, might be made to make the affirmative marketing efforts more effective.

Property owners, the public housing authorities, and the Community Affairs Office will be asked for their analysis and suggestions concerning the City of Goldsboro's affirmative marketing practices.

G. Corrective Action

The City of Goldsboro will take corrective action if the property investors/owners fail to carry out procedures required of them. If, after discussing with the investors/owners ways to improve procedures, the investors/owners continue to fail to meet the affirmative marketing requirement, the City of Goldsboro will consider disqualifying an investor/owner from future participation in its housing programs.

The City of Goldsboro will carry out assessment activities and complete a written assessment of affirmative marketing efforts in time to report results to HUD in the City of Goldsboro's annual performance report.

RESOLUTION ESTABLISHING A VERIFIABLE PERCENTAGE GOAL
FOR PARTICIPATION BY MINORITY BUSINESS IN THE AWARDING
OF BUILDING CONSTRUCTION CONTRACTS
FOR CDBG AND HOME PROGRAM ACTIVITIES

WHEREAS, North Carolina General Statute 143-128 requires that each city or other public body adopt, after public hearing, an appropriate, verifiable percentage goal for participation by minority businesses (as defined within that Statute); and

WHEREAS, establishing such a percentage goal would satisfy the requirements contained within 24 CFR 92.350 as required by the Department of Housing and Urban Development; and

WHEREAS, the City Council, through Resolution No. 1991-32, adopted on March 18, 1991, established a verifiable goal of fifteen percent (15%) for participation by minority businesses in awardance of building construction contracts exceeding \$100,000; and

WHEREAS, after due consideration, the City Council feels that the previously adopted 15% goal would be appropriate if applied to all contracts for CDBG and HOME Program activities, including those which do not exceed \$100,000.

NOW, THEREFORE, BE IT RESOLVED by the City Council of the City of Goldsboro, North Carolina, that:

1. The City shall have a verifiable goal of fifteen percent (15%) of the total dollar amount for all contracts for participation by minority and women's businesses in contracts awarded for CDBG and HOME Program activities; and
2. The Community Development Coordinator is hereby appointed and designated as the City's CDBG and HOME representative and contact person for minority and women contractors. This representative shall be responsible for all record-keeping and other applicable laws pertaining to such activity as may be required.
3. This Resolution shall be in full force and effect from and after this the 16 day of May, 1994.

Approved as to Form Only:

Reviewed by:

W. Howell Everett, Jr.
City Attorney

Richard M. Slozak
City Manager

OTHER ACTIONS (91.220 (k))

Meeting Underserved Needs

The City of Goldsboro petitions for federal funds through the Action Plan to assist the needs of residents that have traditionally been underserved by existing local social service programs. The activities funded via the Action Plan are carefully designed to provide appropriate and needed services, particularly to those that may not be eligible for assistance from other local sources, those that are geographically isolated by lack of transportation and those that lack basic amenities in their neighborhoods. Such individuals include senior citizens, homebound frail elderly persons, physically and developmentally disabled persons, victims of domestic violence, and infants and youth. Funds provided through the Action Plan often make the difference between independent living and institutionalization.

Fostering and Maintaining Affordable Housing

As previously stated in the Annual Affordable Housing Goals, the City will direct a combination of federal, state, and local funds toward achievement of these goals by funding single-family rehabilitation, new construction, infrastructure, and homebuyer assistance. The City will continue to provide rehabilitation assistance to LMI single-family owner-occupied and rental housing units to maintaining decent affordable housing with available program funds. The City will continue to identify potential housing sites that are conducive to the future development of affordable housing and comply with location criteria established by HUD.

The City will also provide \$58,792 in CHDO set-aside HOME funds to designated CHDOs to construct, sell, and/or rent affordable housing units to LMI households. The City will utilize a total of \$111,564 in HOME funds and \$13,643 in local funds to provide direct-subsidy assistance in the form of zero percent deferred second mortgages towards down payment and closing cost for six (6) eligible homebuyers for principal reduction to increase buyer's affordability to purchase a home.

Evaluating and Reducing Lead-Based Paint Hazards

Lead poisoning is a serious yet preventable health problem that can cause long-term neurological damage among young children. The leading cause of lead-based poisoning is exposure to dust from deteriorating paint in homes constructed before 1978. This is due to the high lead content used in paint during that period, particularly in homes built before 1950. Pre-1978 housing occupied by lower income households with children offer high risks of lead exposure due to poor housing conditions related to lower levels of maintenance exercised by lower income households. This is an important factor since it is not the lead paint itself that causes the hazards, but rather the deterioration of the paint that releases lead-contaminated dust and allows children to peel and eat lead-contaminated flakes.

Integration of Lead-Based Paint Policies into Housing Programs

Lead-paint exposure poses a serious health hazard to the children of the City of Goldsboro, particularly those residing in low-to-moderate income households. To address this health issue, the City has committed to take active steps to reduce the incidents of lead poisonings

among children ages six and under caused by lead-paint exposure. To achieve this, the City will integrate lead hazard evaluation and reduction efforts into its existing housing programs. Prior to issuing any type of housing assistance for properties constructed on or before 1978, the City of Goldsboro will inspect the units for lead-paint hazards. Special attention will be given to units that will house children less than six years of age. In addition, the City will apply and utilize other funding sources to aid in the evaluation and reduction of lead-based paint hazards. The City is currently utilizing HUD Lead-Based Paint Hazard Control Grant to reduce lead-paint poisonings among children in the City of Goldsboro.

Reducing the Number of Poverty-Level Families

The City of Goldsboro has undertaken a number of efforts and programs to reduce the number of residents living in poverty. Jointly the Department of Planning and Community Development, the Down East Coalition, and other Community-Based Organizations (CBO) have put into practice a partnership strategically designed to support a holistic approach to poverty reduction with activities that focus on human services, affordable housing, and economic development. These activities include the following:

- ◆ Support economic development activities that generate living wage jobs and community sustainability;
- ◆ Access to a variety of housing options that promote family and community stability;
- ◆ A comprehensive financial education system that prepares citizens for participation in the economic and social fabric of the community, which will be provided by Consumer Credit Counseling Service (CCCS);
- ◆ Support and coordinate with organizations that provide community-based services that nurture and support young people and their families. As well as, organizations that provide enrichment programs designed to develop individuals' coping skill for productive adult living.

Anti-Poverty Strategy

The Anti-Poverty Strategy focuses on programs and policies to utilize in reducing the number of households with incomes below the poverty line, in coordination with affordable housing efforts. The Department of Planning and Community Development will continue to deploy a strategy responsive to the needs of low-to-moderate income citizens and disadvantage populations throughout the five Council Districts. The realization of this strategy has been sustained by the Mayor, City Council, and City Departments. The Department of Planning and Community Development will further the U.S. Department of Housing and Urban Development (HUD) national objectives by coordinating the priorities collectively established in the public hearings with goals and objectives. The strategy will synchronize:

- The Continuum of Care Task Force to eliminate homelessness;
- The existing funded programs;
- The coordination process, policy development and leveraging potential of CDBG eligible activities with private, state, and local funds.

Furthermore, the 2010-2014 Consolidated Plan's poverty strategy shares a unified vision with the Continuum of Care Task Force's plan to reduce homelessness. The City's master plan identifies priorities with a focal point, on the following objectives:

- Making capital investments that will facilitate future economic growth;
- Safeguarding the City's fiscal solvency; and
- Ensuring the delivery of quality services to enhance quality of life.

The City of Goldsboro's enhancement of quality of life services compliments HUD's CDBG national objectives by seeking to expand a modern communication system, reduction of crime, quality park system, clean streets, suitable living environment and adequate transportation infrastructure.

Develop Institutional Structure

During the process of developing the 2010-2014 Consolidated Plan, the City of Goldsboro developed a unified vision for Community Development actions that will serve as the institutional structure for cooperation and collaboration among public and private agencies. Specifically, the Department of Planning and Community Development sought to identify opportunities for cooperation and collaboration among city departments and other entities. The goal was to encourage city departments to work together in addressing the needs of the target communities and to develop inter-departmental agreements for coordinating projects and maximizing the use of funds. Many social service agencies, not-for-profit agencies, youth organizations, and community-based organizations were also consulted. After several consultations with these organizations, the City determined that the Consolidated Plan and the annual Action Plans should:

- ❖ Provide an interdepartmental plan for housing, economic development, and social services that will inform the Anti-poverty strategy.
- ❖ Facilitate greater efficiency in the use of resources through collaboration and coordination among departments and agencies
- ❖ Encourage information dissemination regarding projects and programs.

By institutionalizing this collaborative structure, the City of Goldsboro is shaping various programs into effective, coordinated neighborhood and community strategies. This also facilitates the opportunity for strategic planning and citizen participation to take place in a comprehensive context that will reduce duplication of effort at the local level.

Enhance Coordination between Stakeholders

The coordination process provides for stakeholder agencies and all interested parties to analyze and discuss local housing needs, priorities, and program strategies. As explained above, the Department of Planning and Community Development has served as the facilitating agency for this local process. To this end, the 2010-2014 Consolidated Plan provides a blue print to guide City actions in the direction of performance outcomes, such as improving neighborhoods and increasing homeownership opportunities. Primarily the plan guides City leadership and financial resources in route with the priorities set forth by the community. The plan is aggressive in its

approach to leverage other funding and build partnerships. The strategic approach builds on the City strengths safeguarding efficient city services, business retention, preserving the housing stock and increasing income levels for all residents. The overall strategy is for the City to:

- Provide clear and expressive public leadership for the identified initiatives;
- Fortify the partnering and collaboration of local government agencies, private organizations, and not-for-profits to increase leveraging potential;
- Publicly market the City's assets and aggressively leverage other financial support;
- Work with developers to achieve acceptable environmental standards while not compromising the health and safety of the public

Assisting Trouble Public Housing Agencies

It should be noted that the City of Goldsboro does not manage public housing units; however, a large portion of the County's inventory is located within the City limits. The City has two public housing agencies responsible for this function: Goldsboro Housing Authority and Eastern Carolina Regional Housing Authority. Both public housing authorities received funding for their housing activities, projects, and funds to modernize and repair their public housing units. The City has adopted initiatives for which the City will coordinate and optimize the efforts of the public housing authorities on page 17 of this 2014-2015 Action Plan cycle.

MWBE PROGRAM POLICY AND PROCEDURES (92.351 (b))

Statement of Policy

It is the policy of the City of Goldsboro to provide minorities and women equal opportunity to participate in the programs and services offered by the City.

Further, it is the City of Goldsboro's policy to prohibit discrimination against any person or business in pursuit of these opportunities on the basis of race, color, sex, religion, familial status, handicap, or national origin.

Procedures

The City of Goldsboro Planning and Community Development Department will actively seek and identify qualified minority and women business enterprises and offer them the opportunity to participate in all program and services. An outreach program will be coordinated with the City of Goldsboro Community Affairs Offices and several additional outreach methods will be implemented including:

Direct Solicitations
Contractor Workshops
Newspaper Advertisements
Radio Advertisement

To the maximum extent possible, the Planning and Community Development Department will insure the inclusion of minorities and women in facilitating the activities of providing affordable housing, rehabilitation, and development.

MONITORING PLAN (91.230)

The City of Goldsboro is responsible for ensuring that all funds under its oversight are utilized in accordance with all program requirements and for determining the adequacy of the subrecipients/project sponsor's ("subrecipient") performance. The goal of this Monitoring Plan ("plan") is to make informed decisions as to which subrecipients have an increased likelihood of experiencing performance difficulties and to make sure the Department of Planning and Community Development devotes extra attention to such agencies. Monitoring shall be a tool for avoiding problems and improving performance as an ongoing process of planning, implementation, and follow-up for any subrecipient, CHDOs, and Rental projects, and other CDBG and HOME funded activities.

This plan shall allow the City to make informed judgments about the subrecipients' program effectiveness and efficiency, and their ability to comply with all applicable laws and regulations. In addition, monitoring helps to identify deficiencies, and highlight accomplishments.

1. Subrecipient Projects:

Monitoring of sub-recipient projects has five major components:

- a. **Grant Applications:** Request for funding application is made on a standard form and is carefully reviewed and evaluated. Areas of consideration include, but not limited to, community need, program effectiveness, financial record keeping, and capacity. Recommendations for funding are based on evaluation of the above criteria.
- b. **Contractual Agreements:** The City of Goldsboro Community Development Department enters into a two-part contractual grant agreement with each sub-recipient.
 - Part I. Describes the tasks to be performed with the grant funds, the projected results to be achieved, and other conditions specific to the project.
 - Part II. Lists all Federal standards with which the agency must comply. The program administrator conducts pre-monitoring, desk monitoring, and on-site monitoring at least once a year to review for contractual and regulatory compliance.
- c. **Monitoring Records:** For each sub-recipient, the staff maintains monitoring records that include the following:
 1. Basic program and agency information
 2. A review of the agency's CPA audit (if required)
 3. Quarterly financial and programmatic reports

4. Monthly draw requests from the sub-recipient
5. On-site or desk review monitoring reports
6. Correspondence and notes of significant telephone conversations.

2. On-Site Visits

Staff performs on-site monitoring reviews at least annually, depending on the need assessment. Programs operations are observed, sub-recipient staff interviewed, client eligibility confirmed, and financial and programmatic reports verified from original documentation.

3. Long-Term Compliance

Activities involving real property acquisition or improvement require long-term compliance with the original purpose of the federal assistance. The City of Goldsboro Community development Department maintains a CDBG Real Property Inventory that is updated annually and confirms that such property is still being used for the intended purpose. The City of Goldsboro Community Development Department will review HOME-assisted rental units, to ensure compliance with Housing Quality Standards, tenant eligibility, and rent charges.

The City of Goldsboro Community Development Department monitors the federally funded projects that are implemented by the department through a project tracking and management system. This process includes monthly management reports, monthly interdepartmental program and financial reports. Project expenditures are compared with budgets on a monthly basis.

The City of Goldsboro uses standard operating procedures that have been designed to comply with federal standards. HUD monitoring and the City of Goldsboro Community Development Department's single audit provide annual independent review of compliance by both the Community Development Department and the sub-recipients.

PROGRAM ACTIVITIES MONITORING

Rehabilitation 24 CFR 570.202

Regulatory Compliance

- Location (census tract data)
- Type of housing (SF/MF), commercial
- Number of units per structure
- Historic preservation
- Lead-based paint (inspection/remediation)
- Household income (L/M benefit)
- Procurement and Bonding
- Labor Standards Review

- Relocation and Real Property Acquisition
- Environmental Review (date/findings)
- Project in Special Flood Hazard Area
- Section 504/ADA compliance

Comparison of Performance Records with Agreement/Application

- Scope of Work (work write-up), plans and specs, and original cost estimate)
- Contract award date and work proceed order date
- Final inspection date and notice of completion
- Number of units completed compared to Application/Agreement

In-house Cost and Productivity Review

- Method used to assure reasonable costs
- Direction construction costs (per unit)
- Indirect/administrative costs compared to cost allocation plan
- Costs within 10% of in-house estimate
- Cost per unit

Community Housing Development Organization (24 CFR Part 92 Subpart G)

- .300 Set-Aside for Community Housing Development Organizations (CHDOs)
- .301 Project-Specific Assistance to CHDOs
- .302 Housing Education and Organizational Support
- .303 Tenant Participation Plan

Monitoring CHDO Activities

All CHDOs will be monitored annually for recertification purposes using the following criteria:

- **Non-profit status** – The CHDO must maintain its status as a non-profit corporation with 501 (c) (3) or 501 (c) (4) IRS tax-exempt ruling.
- **Affordable Housing Commitment** – The CHDO must have a stated commitment to the development of affordable housing in the community it serves as evidenced by articles of incorporation, by-laws of the organization, board resolution, or by charter.
- **Not Controlled by Public or For-Profit** – The CHDO must continue to be free of external controls, either from public or for-profit interests.
- **Capacity** – The CHDO must have its own staff and must be capable of engaging in the housing development activity it intends to pursue. The CHDO must currently have adequate capacity or must have demonstrated capacity-building activities.
- **Board Composition** – The CHDO's board structure must continue to reflect the community it intends to serve and otherwise meet the regulatory requirement of the HOME program.

Specific monitoring provisions will include:

Sub-recipients

1. Sub-recipients will be required to submit quarterly reports on their programs and activities. These reports will include relevant information such as the number of units completed and/or persons served; the amount of funds expended or obligated; number of cases processed; factors which adversely affect or hinder implementation; accomplishments of programs or activities.
2. The City will require written verification on the work accomplished with all requests for funds from sub-recipients of contractors, prior to release of payment, unless prior approval for advances has been granted in writing.
3. The Community Development staff will prepare periodic progress reports for review by the Planning Director, the Community Development Advisory Committee, the City Manager, and the City Council.
4. Semi-annual site visits (June and November) are to be done for new sub-recipients with annual visits after the first year. These visits will be conducted to monitor record keeping, reports, and administration compliance.

CHDO Monitoring

1. All CHDOs will be required to comply with items two (2) and three (3) as listed under the Sub-recipient monitoring.
2. CHDO board composition will be reviewed annually to ensure compliance with organizational structure as defined under the HOME regulations and 24 CFR Part 92.2.
3. On site inspections will be made for all new units constructed before any request for payment is processed.
4. Annual review of office records will be conducted for monitoring of funded activities, contractors, administration, and applicant pool.

HOME Rental Projects

1. Monitoring shall be conducted in accordance with the guidelines as set under the HOME Rental Program Activities.
 - a. Review of market analysis, project design, and assessment of sites prior to commitment of funds for land or property acquisition, to ensure that environmental, site, and neighborhood standards are being implemented.
 - b. Review of development budget to determine reasonable costs and to verify the need of HOME program funds to development project prior to the commitment of funds.
 - c. During and upon completion of construction or acquisition to ensure that construction or acquisition has been carried out in accordance with the plan and relevant regulations and all costs are eligible.

- d. During and upon completion of rent-up to ensure that marketing, tenant selection, tenant income determination, and the assignment of units have been carried out and properly documented.
- e. Forms used and recommended for program monitoring in the ICF Housing and Community Development Group training manual “Review Project Finances and Building CHDOs” will be used to ensure every area of compliance is covered.
 - 1. Program Monitoring Checklist
 - 2. Project Development Monitoring Checklist
 - 3. Rent-up and Ongoing Monitoring Checklist
- 2. To ensure continued compliance, annual examinations of project activities related to unit rents and occupancy, re-certification of tenant income, and property inspections will be done throughout the project’s period of affordability. This will be conducted at the beginning of each calendar year.

ORGANIZATIONS AND MONITORING SCHEDULE

CHDOS

- 1. Habitat for Humanity of Goldsboro-Wayne, Inc. and Rebuilding Broken Places, CDC
 - a. Onsite program monitoring will be conducted on a yearly basis in the month of **July of each program year.**
 - b. Weekly site visits during construction of housing units.
 - c. Walk through and inspection at the completion of construction of each housing unit.
- 2. Goldsboro Development Corporation (GDC)
 - a. Onsite program monitoring will be conducted on a yearly basis in the month of **August of each program year.**
 - b. Walk through and inspection before closing for acquisition of each rental housing unit.
 - c. Inspection of each unit will be conducted every three years as required by HUD regulations.

PUBLIC SERVICES PROGRAMS

On-site monitoring visits will be conducted with each funded public service agency on a yearly basis according to the schedule as outlined below.

- | | |
|-----------------------------------------------|--------------------------------------|
| 1. Boys and Girls Club of Wayne County | Month of June for this program year |
| 2. Consumer Credit Counseling Services (CCCS) | Month of June for this program year |
| 3. Literacy Connections of Wayne County | Month of May for this program year |
| 4. Rebuilding Broken Places, CDC | Month of May for this program year |
| 5. Wayne Community College (WCC) | Month of April for this program year |
| 6. WISH School Health Program (WISH) | Month of April for this program year |

Each agency will receive a monitoring notification letter within 30 days of the scheduled monitoring visit. Upon completion of the monitoring process, the agency will receive a monitoring review letter within 15 days. A response to the review should be submitted to the Community Development Office within 30 days of receiving the review letter. An agency in need of technical assistance should submit a written request to the Community Development Office.

DISPLACEMENT AND RELOCATION STRATEGY AND REGULATIONS (92.353)

Section 104(d) of the Housing and Community Development Act, as amended, requires the City of Goldsboro to adopt; make public, and certify that it is following a Residential Ant-displacement and Relocation Assistance Plan. The definitions of a "displaced person" and regulations concerning relocation and displacement are contained in 24 CFR Sec. 570.606 and 49 CFR 24.

PREVENTION AND MINIMIZATION OF DISPLACEMENT

The City of Goldsboro will take all reasonable steps to prevent and minimize the displacement of families, individuals, businesses, non-profit organizations, and farms as a result of activities assisted under the Community Development Block Grant Program.

These steps will include:

- 1) Stage rehabilitation in order to allow tenants to remain during and after rehab, or
 - a. Stage the rehab so that empty buildings or units can be rehabbed first and then allow tenants to move into rehabbed units before rehab commences on occupied units.
- 2) Establish temporary relocation facilities in order to house families whose displacement will be of short duration so that they can move back to their neighborhood after rehab or construction.
- 3) Adopt policies, which help to ensure certain rights for tenants with condominium or cooperative conversions.
- 4) Inform residents of neighborhoods with proposed revitalization, through local media (that is targeted at the specific neighborhoods) that public programs exist to assist households facing displacement.
- 5) Give participants the opportunity to relocate to the project area upon completion of the project.
- 6) Provide relocation advisory service.

ONE FOR ONE-REPLACEMENT UNITS

The City of Goldsboro will replace all occupied and vacant occupiable low-to-moderate income dwelling units demolished or converted to a use other than as low-to-moderate income housing units in connection with an activity assisted under the Community Development Block Grant program. All replacement housing will be provided within three (3) years of the commencement of the demolition or rehabilitation related to conversion. Before obligating or expending funds that will directly result in such demolition or conversion, the City of Goldsboro will make public and submit to the HUD Field Office the following information, in writing:

RESIDENTIAL ANTIDISPLACEMENT & RELOCATION ASSISTANCE PLAN

- 1) A description of the proposed assisted activity;
- 2) The general location on a map and approximate number of dwelling units by size (number of bedrooms) that will be demolished or converted to a use other than as low/mod income dwelling units as a direct result of the assisted activities;
- 3) A time schedule for the commencement and completion of the demolition or conversion;
- 4) The general location on a map and approximate number of dwelling units by size (number of bedrooms) that will be provided as replacement dwelling units;
- 5) The source of funding and a time schedule for the provision of replacement dwelling units;
- 6) The basis for concluding that each replacement dwelling unit will remain a low/moderate income dwelling unit for at least ten (10) years from the date of initial occupancy.

The City of Goldsboro will provide relocation assistance, as described in 24 CFR 570.606, to each low-to-moderate income household displaced by demolition of housing or by the conversion of a low-to-moderate income dwelling to another use as a direct result of assisted activities

Code of Federal Regulations

Title 24 - Housing and Urban Development

Volume: 3

Date: 2011-04-01

Original Date: 2010-04-01

Title: Section 570.606 - Displacement, relocation, acquisition, and replacement of housing.

Context: Title 24 - Housing and Urban Development. Subtitle B - Regulations Relating to Housing and Urban Development (Continued). CHAPTER V - OFFICE OF ASSISTANT SECRETARY FOR COMMUNITY PLANNING AND DEVELOPMENT, DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT. SUBCHAPTER C - COMMUNITY FACILITIES. PART 570 - COMMUNITY DEVELOPMENT BLOCK GRANTS. Subpart K - Other Program Requirements.

570.606 Displacement, relocation, acquisition, and replacement of housing.

(a) *General policy for minimizing displacement.* Consistent with the other goals and objectives of this part, grantees (or States or state recipients, as applicable) shall assure that they have taken all reasonable steps to minimize the displacement of persons (families, individuals, businesses, nonprofit organizations, and farms) as a result of activities assisted under this part.

(b) *Relocation assistance for displaced persons at URA levels.* (1) A displaced person shall be provided with relocation assistance at the levels described in, and in accordance with the requirements of 49 CFR part 24, which contains the government-wide regulations implementing the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (URA) (42 U.S.C. 4601-4655).

(2) *Displaced person.* (i) For purposes of paragraph (b) of this section, the term "displaced person" means any person (family, individual, business, nonprofit organization, or farm) that moves from real property, or moves his or her personal property from real property, permanently and involuntarily, as a direct result of rehabilitation, demolition, or acquisition for an activity assisted under this part. A permanent, involuntary move for an assisted activity includes a permanent move from real property that is made:

(A) After notice by the grantee (or the state recipient, if applicable) to move permanently from the property, if the move occurs after the initial official submission to HUD (or the State, as applicable) for grant, loan, or loan guarantee funds under this part that are later provided or granted.

(B) After notice by the property owner to move permanently from the property, if the move occurs after the date of the submission of a request for financial assistance by the property owner (or person in control of the site) that is later approved for the requested activity.

(C) Before the date described in paragraph (b)(2)(i)(A) or (B) of this section, if either HUD or the grantee (or State, as applicable) determines that the displacement directly resulted from acquisition, rehabilitation, or demolition for the requested activity.

(D) After the "initiation of negotiations" if the person is the tenant-occupant of a dwelling unit and anyone of the following three situations occurs:

(1) The tenant has not been provided with a reasonable opportunity to lease and occupy a suitable decent, safe, and sanitary dwelling in the same building/complex upon the completion of the project, including a monthly rent that does not exceed the greater of the tenant's monthly rent and estimated average utility costs before the initiation of negotiations or 30 percent of the household's average monthly gross income; or

(2) The tenant is required to relocate temporarily for the activity but the tenant is not offered payment for all reasonable out-of-pocket expenses incurred in connection with the temporary relocation, including the cost of moving to and from the temporary location and any increased housing costs, or other conditions of the temporary relocation are not reasonable; and the tenant does not return to the building/complex; or

(3) The tenant is required to move to another unit in the building/complex, but is not offered reimbursement for all reasonable out-of-pocket expenses incurred in connection with the move.

(ii) Notwithstanding the provisions of paragraph (b)(2)(i) of this section, the term "displaced person" does not include:

(A) A person who is evicted for cause based upon serious or repeated violations of material terms of the lease or occupancy agreement. To exclude a person on this basis, the grantee (or State or state recipient, as applicable) must determine that the eviction was not undertaken for the purpose of evading the obligation to provide relocation assistance under this section;

(B) A person who moves into the property after the date of the notice described in paragraph (b)(2)(i)(A) or (B) of this section, but who received a written notice of the expected displacement before occupancy.

(C) A person who is not displaced as *described* in 49 CFR 24.2(g)(2).

(D) A person who the grantee (or State, as applicable) determines is not displaced as a direct result of the acquisition, rehabilitation, or demolition for an assisted activity. To exclude a person on this basis, HUD must concur in that determination.

(iii) A grantee (or State or state *recipient*, as applicable) may, at any time, request HUD to determine whether a person is a displaced person under this section.

(3) *Initiation of negotiations.* For purposes of determining the type of replacement housing assistance to be provided under paragraph (b) of this section, if the displacement is the direct result of privately undertaken rehabilitation, demolition, or acquisition of real property, the term "initiation of negotiations" means the execution of the grant or loan agreement between the grantee (or State or state recipient, as applicable) and the person owning or controlling the real property.

(c) *Residential antidisplacement and relocation assistance plan.* The grantee shall comply with the requirements of 24 CFR part 42, subpart B.

(d) *Optional relocation assistance.* Under section 105(a)(11) of the Act, the grantee may provide (or the State may permit the state recipient to provide, as applicable) relocation payments and other relocation assistance to persons displaced by activities that are not subject to paragraph (b) or (c) of this section. The grantee may also provide (or the State may also permit the state recipient to provide, as applicable) relocation assistance to persons receiving assistance under paragraphs (b) or (c) of this section at levels in excess of those required by these paragraphs. Unless such assistance is provided under State or local law, the grantee (or state recipient, as applicable) shall provide such assistance only upon the basis of a written determination that the assistance is appropriate (see, e.g., 24 CFR 570.201 (i), as applicable). The grantee (or state recipient, as applicable) must adopt a written policy available to the public that describes the relocation assistance that the grantee (or state recipient, as applicable) has elected to provide and that provides for equal relocation assistance within each class of displaced persons.

(e) *Acquisition of real property.* The acquisition of real property for an assisted activity is subject to 49 CFR part 24, subpart B.

(f) *Appeals.* If a person disagrees with the determination of the grantee (or the state recipient, as applicable) concerning the person's eligibility for, or the amount of, a relocation payment under this section, the person may file a written appeal of that determination with the grantee (or state recipient, as applicable). The appeal procedures to be followed are described in 49 CFR 24.10. In addition, a low- or moderate-income household that has been displaced from a dwelling may file a written request for review of the grantee's decision to the HUD Field Office. For purposes of the State CDBG program, a low- or moderate-income household may file a written request for review of the state recipient's decision with the State.

(g) *Responsibility of grantee or State.* (1) The grantee (or State, if applicable) is responsible for ensuring compliance with the requirements of this section, notwithstanding any third party's contractual obligation to the grantee to comply with the provisions of this section. For purposes of the State COBG program, the State shall require state recipients to certify that they will comply with the requirements of this section.

(2) The cost of assistance required under this section may be paid from local public funds, funds provided under this part, or funds available from other sources.

(3) The grantee (or State and state recipient, as applicable) must maintain records in sufficient detail to demonstrate compliance with the provisions of this section.

(Approved by the Office of Management and Budget under OMB control number 2506-0102)
[61 FR 11477, Mar. 20, 1996, as amended at 61 FR 51760, Oct. 3, 1996]

NEIGHBORHOOD REVITALIZATION STRATEGY AREA

A neighborhood revitalization strategy includes the economic empowerment of low- and moderate-income persons allows cities greater flexibility in the use of CDBG funds in the revitalization area(s). These incentives are as follows:

- (1) **Job Creation/Retention as Low/Mod Area Benefit:** Job creation/retention activities undertaken pursuant to the strategy may be qualified as meeting area benefit requirements, thus eliminating the need for a business to track the income of persons that take, or are considered for, such jobs (24CFR 570.208(a)(1)(vii) and(d)(5)(i));
- (2) **Aggregation of Housing Units:** Housing units assisted pursuant to the strategy may be considered to be part of a single structure for purposes of applying the low- and moderate-income national objective criteria, thus providing greater flexibility to carry out housing programs that revitalize a neighborhood (24 CFR 570.208(a)(3) and (d) (5) (ii));
- (3) **Aggregate Public Benefit Standard Exemption:** Economic development activities carried out under the strategy may, at the grantee's option, be exempt from the aggregate public benefit standards, thus increasing a grantee's flexibility for program design as well as reducing its record-keeping requirements(24CFR 570.209(b)(2)(v)(L) and (M)); and,
- (4) **Public Service Cap Expenditure:** Public services carried out pursuant to the strategy by a Community-Based Development Organization will be exempt form the public service cap (24 CFR 570.204(b)(2)(ii).

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

- (1) **Boundaries:** The grantee has identified the neighborhood's boundaries for which the strategy applies. All areas within those boundaries must be contiguous;
- (2) **Demographic Criteria:** The designated area must be primarily residential and contain a percentage of low-and moderate- income residents that is equal to the "upper quartile percentage" (as computed by HUD pursuant to (24 CFR 570.208(a)(1)(ii) or 70percent, whichever is less, but not less than 51 percent);
- (3) **Consultation:** The strategy must be developed in consultation with the area's stakeholders, including residents, owners/operators of businesses and financial institutions, non-profit organizations, and community groups that are in or serve the neighborhood;
- (4) **Assessment:** The strategy must include an assessment of the economic situation in the area and an examination of economic development improvement opportunities and the problems likely to be encountered;

- (5) **Economic Empowerment:** There must be a realistic development strategy and implementation plan to promote the area's economic progress focusing on activities to create meaningful jobs for the unemployed and low-and moderate-income residents of the area (including jobs created by HUD-assisted efforts) as well as activities to promote the substantial revitalization of the neighborhood; and
- (6) **Performance Measurement:** The strategy must identify the results (e.g. physical improvements, social initiatives, and economic empowerment) expected to be achieved, expressing them in terms that are readily measurable. This will be in the form of "benchmarks."

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

GLOSSARY OF TERMS

Affordable Housing: Affordable Housing is generally defined as housing where the occupant, who is low to moderate income, is paying no more than 30 percent of his or her income for gross housing costs, including utilities.

Community Development Block Grant Program (CDBG): Authorized by the Housing and Community Development Act of 1974 replacing several community development categorical grant programs. CDBG provides eligible metropolitan cities and urban counties (called "entitlement communities") with annual direct grants that they can use to revitalize neighborhoods, expand affordable housing and economic opportunities, and/or improve community facilities and services, principally to benefit low- and moderate-income persons.

Community and Housing Development Organization (CHDO): A federally defined type of nonprofit housing provider that must receive a minimum of 15 percent of all Federal HOME Investment Partnership funds. The primary difference between CHDO and other nonprofits is the level of low-income resident participation on the Board of Directors.

Consolidated Plan: Developed by local and state governments with the input from citizens and community groups, the Consolidated Plan serves four functions:

- it is a planning document for each state and community, built upon public participation and input;
- it is the application for funds under HUD's formula grant programs (CDBG, HOME, ESG, and HOPWA);
- it outlines out local priorities; and
- it provides a 3-5 year strategy the jurisdiction will follow in implementing HUD programs.

Down Payment: The part of the purchase price of a property that the buyer pays in cash and does not finance with a mortgage.

Debt-to-income ratio: Percentages lenders use to decide whether a loan applicant can afford to make payments on a certain mortgage loan. Lenders may allow first-time homebuyers to use 33% of monthly income for housing costs, and a total of 38% for housing costs and all other debt.

Entitlement: An underlying formula governing the allocation of Block Grant funds to eligible recipients. Entitlement grants are provided to larger urban cities (i.e., population greater than 50,000) and larger urban counties (greater than 200,000).

Extremely low-income family: Family whose income is between 0 and 30 percent of the median income for the area, as determined by HUD with adjustments for smaller and larger families, except that HUD may establish income ceilings higher or lower than 30 percent of the median for the area on the basis of HUD's findings that such variations are necessary because of prevailing levels of construction costs or fair market rents, or unusually high or low family incomes.

Fair Market Value: The highest price that a buyer, willing but not compelled to buy, would pay, and the lowest a seller, willing but not compelled to sell, would accept.

Fair Market Rents (FMR): Rent Schedules published in the Federal Register that establishes maximum eligible rent levels allowed under the Section 8 program by geographic area.

Family: All persons living in the same household who are related by birth, marriage or adoption.

Gross income: The total amount of money that a person receives, before taxes and other deductions. This income may include funds from a job or jobs; interest or dividends; alimony; disability payments; or public assistance.

HOME: Provides funds to local governments and states for new construction, rehabilitation, acquisition of standard housing, assistance to homebuyers, and tenant-based rental assistance.

Housing expense ratio: The percentage of a person's gross monthly income that it takes to pay a mortgage loan payment plus interest, property taxes, and insurance. Lenders use this ratio to decide whether or not to make mortgage loans.

Household: All the persons who occupy a housing unit. The occupants may be a single family, one person living alone, two or more families living together, or any other group of related or unrelated persons who share living arrangements.

Low-income families: Low-income families whose incomes do not exceed 50 percent of the median family income for the area, as determined by HUD with adjustments for smaller and larger families, except that HUD may establish income ceilings higher or lower than 50 percent of the median for the area on the basis of HUD's findings. Such variations are necessary because of prevailing levels of construction costs or fair market rents, or unusually high or low family incomes.

Low-to-moderate-income household: A household having an income equal to or less than the Section 8 low-income limit established by HUD (80% of the median family income).

Low-to-moderate-income person: A member of a family having an income equal to or less than the Section 8 low-income limit established by HUD (80% of the median family income). Unrelated individuals will be considered as one-person families for this purpose.

Mixed-Income: Refers to a resident mix that includes families with various income levels within one development. Mixed-income developments combine public housing families with other residents in order to decrease the economic and social isolation of these families.

Moderate-income: Households whose incomes do not exceed 80 percent of the median income for the area, as determined by HUD, with adjustments for smaller or larger families.

Monthly housing costs: The total of a homeowner's mortgage loan payment and expenses for utilities, general home repair, and upkeep.

Program income: gross income received by recipient or subrecipient directly generated from use of CDBG funds and HOME funds.

Property inspection: The examination of a house by a licensed inspector to see if its structure is sound and if its mechanical systems, such as plumbing and heating, are working.

Public Housing Agency (PHA): Organization created by local government, which administers HUD's Low-Income Public Housing Program and other HUD programs.

Rehab: Short for "rehabilitation." Rebuild an existing house or building, to make the space more livable or usable and more valuable.

Second mortgage: A mortgage that has rights that are subordinate to the rights of the first mortgage holder.

Section 8: HUD assists low- and very low income families in obtaining decent, safe, and sanitary housing in private accommodations by making up the difference between what they can afford and the approved rent for an adequate housing unit.

Specifications: A detailed description of the size, shape, materials, and other details of a building or remodeling project.

Total monthly debt: Total amount of monthly credit card, car loan and other debt payments. Used to determine debt-to-income ratios.

Total monthly income: The amount of money that comes into a household every month from a job or jobs, interest or dividends, alimony, disability payments, and public assistance. A lender uses the total monthly income figure to decide how much house payment a loan applicant can afford. Also called gross monthly income.

Transitional housing: Housing that is designed to provide housing and appropriate supportive services to persons, including (but not limited to) de-institutionalized individuals with disabilities, homeless individuals with disabilities, and homeless families with children; and has as its purpose facilitating the movement of individuals and families to independent living within a time period that is set by the participating jurisdiction or project owner before occupancy.

U.S. Department of Housing and Urban Development (HUD): A federal government agency responsible for managing many of the nation's housing programs and for protecting rights of homebuyers, homeowners, sellers, and renters.

Underwriting: The process of analyzing a borrower's finances and credit in order to decide whether or not to make a loan. The underwriter is the person who has authority to approve a loan.

Unsecured credit: Credit not secured by property (such as a house). A credit card is unsecured debt; Deed of Trust secures a mortgage loan.

VA loans: A loan that is guaranteed by the Veterans Administration.

Very low-income families: Low-income families whose annual incomes do not exceed 50% of HUD-determined median family for the area.

Warranty: A guarantee by a seller or manufacturer that a product is what it is claimed to be, that it is in working order, and, in some cases, that the seller or maker will repair the product.

Zoning: A body of public law that regulates the use, placement and height of improvements, size of lots in subdivisions, off-street parking, and other planned uses of private property.

For Information contained in the Attachments, please contact the Community Development Office by phone 919-580-4318 or visit the office at 214 North Center Street Goldsboro, between the hours of 8:00 a.m. and 5:00 p.m., Monday through Friday.