City of Goldsboro 2014- 2015 Consolidated Annual Performance and Evaluation Report (CAPER)



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

Reporting Period
July 1, 2014 thru June 30, 2015



2014 - 2015 Consolidated Annual **Performance and Evaluation Report (CAPER)**

COMMUNITY DEVELOPMENT BLOCK GRANT PROGRAM HOME INVESTMENT PARTNERSHIP PROGRAM



CITY OF GOLDSBORO, NORTH CAROLINA

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CITY OF GOLDSBORO

CAPER FISCAL YEAR 2014-2015

INTRODUCTION

Beginning with fiscal year 1996, the Department of Housing and Urban Development (HUD) amended its regulations to allow for the single submission of six planning and application submissions for Community Planning and Development's (CPD) formula grant programs. This new planning document, the Consolidated Plan, considers non-housing community development needs as well as housing needs, and is designed to allow communities to create a unified vision for meeting the needs of low and moderate-income families. As a part of the Consolidated Plan process, jurisdictions were required to submit to HUD an Annual Performance Report (APR) and the Grantee Performance Report (GPR) that describes annual achievements towards meeting the strategies and objectives outlined in the Consolidated Plan.

HUD and its Community Planning and Development (CPD) formula grant program grantees will be transitioning to a new Integrated Disbursement and Information System (IDIS). All Entitlement grantees should be using the system to track disbursements and report performance on outputs and outcomes for the program year. Grantees must report on program year accomplishments, outcomes, and performance and Field Office staff subsequently must review that performance. With the development of the Integrated Disbursement and Information System (IDIS), the Consolidated Annual Performance Evaluation Report (CAPER) is now the means by which the reports are being submitted.

Beginning October 1, 2006, each Consolidated Annual Performance and Evaluation Report (CAPER) or Performance and Evaluation Report (PER) should include the status of the grantee's efforts toward implementing outcome performance measurement system requirements described in the Federal Register Notice dated March 7, 2006. All CAPER or PER reports should provide a description of how the jurisdiction's or State's program provided new or improved availability/accessibility, affordability, sustainability of decent housing, a suitable living environment, and economic opportunity. The CAPER/PER must include a comparison of the proposed versus actual outcomes for each outcome measure submitted with the consolidated plan and explain, if applicable, why progress was not made toward meeting goals and objectives.

I. EXECUTIVE SUMMARY

The City of Goldsboro (City) submitted its Annual Action Plan for fiscal year 2014-2015 on May 15, 2014 to the Department of Housing and Urban Development. In August 2014, HUD approved the City's Annual Action Plan and Goldsboro was awarded \$325,648 in Community Development Block Grant (CDBG) and \$159,653 in HOME Investment Partnership (HOME) funds to perform eligible housing and non-housing community development activities for low-to-moderated income citizens of this area.

The 2014-2015 Annual Action Plan described in detail the housing and non-housing needs of the area, market conditions based on the best data available at the time and set forth strategies that established priorities for meeting the needs identified. Additionally, the Plan outlined resources anticipated to be available to address priority areas of need and established an Annual Action Plan that identified the intended uses of resources. During the past year, 2014-2015, the City used federal entitlement funds to provide decent, safe, and affordable housing for low-to-moderate income citizens through housing rehabilitation and homeownership assistance programs, provided funds for public facilities and improvements, assisted with public services, and funded after school enrichment activities for the City's low-to-moderate income children. The City of Goldsboro completed many of its strategic community goals in program year 2014-2015. In areas, where goals were not fully completed the City has developed plans to address those areas to utilize in the upcoming fiscal year.

The City of Goldsboro continues to use the HOME allocation to offer homebuyer assistance for first-time homebuyers and to expand the affordable housing stock for low-to-moderated income persons and families through its designated Community Housing Development Organization (CHDO), Habitat for Humanity of Goldsboro-Wayne, Inc.

This 2014-2015 CAPER summarizes the City's achievements in meeting the objectives set forth in 2014-2015 Annual Action Plan. It covers the period July 1, 2014 through June 30, 2015.

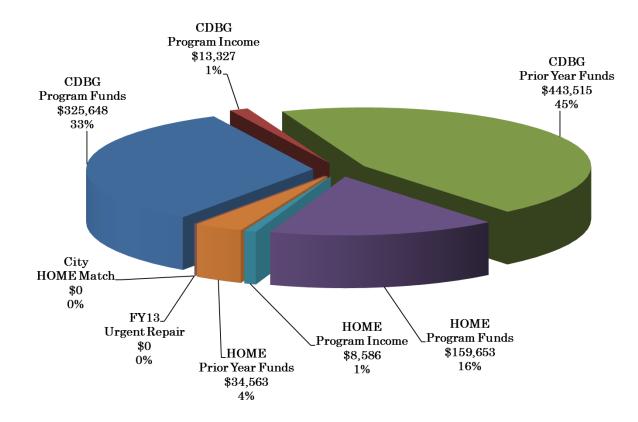
Summary of Resources

In accordance with 24 CFR Part 21, 220 of Title 1 of the Housing and Community Development Act of 1974, as amended, the City of Goldsboro's one year Action Plan outlined the activities that were funded using CDBG and HOME funds as well as identify leveraged funds from other sources. The following funding was available to address the goals and objectives in the City of Goldsboro's Annual Action Plan FY 2014, which were implemented between July 1, 2014 and June 30, 2015.

In FY 2014-2015, the City received \$325,648 in CDBG funds and \$159,653 in HOME funds. In addition to FY14 allocations, the City had approximately \$443,515 in prior year CDBG funds, \$34,563 in prior year HOME funds, and \$37,000 in Urgent Repair funds from NC Housing Finance Agency. Although the City budgeted \$19,957 from General funds for local HOME match, the City was granted 100% HOME Match Reduction. Therefore, the City was not required to provide local matching funds for FY13 HOME allocation. The City receipted program income of \$13,327 in CDBG and \$8,586 in HOME as a result of the repayment of housing rehabilitation loans invested to benefit low-to-moderated income families in previous years. The program income was disbursed according to the HUD guidelines with program income being disbursed before other funds are used for administrative costs and program activities.

Private financial institutions and lenders, within the area, 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. Financial institutions and lenders that participated in the City's Homebuyer Assistance Program for 2014-2015 included Habitat for Humanities of Goldsboro-Wayne County, and North Carolina Housing Finance Agency. These Lenders contributed funds toward **three** (3) mortgages for a first-time homebuyer in the amount of \$298,667.50.

| FY14 Available Funding | CDBG | HOME | Other Funds | Total |
|----------------------------------|-----------|-----------|-------------|-----------|
| 2014-2015 CDBG Program Funds | \$325,648 | | | |
| CDBG Program Income | \$13,327 | | | |
| CDBG Prior Year Funds | \$443,515 | | | |
| 2014-2015 HOME Program Funds | | \$159,653 | | |
| HOME Program Income | | \$8,586 | | |
| HOME Prior Year Funds | | \$34,563 | | |
| FY14 Urgent Repair Program Funds | | | \$0 | |
| City Match Funds for HOME | | | \$0 | - |
| TOTALS | \$782,490 | \$202,802 | \$0 | \$985,292 |



Distribution of Funds

All Community Development funds received by the City of Goldsboro were used on eligible housing and non-housing community development activities within the City limits of Goldsboro and primarily benefit the low-to-moderated income citizens of this area. Goldsboro's housing and non-housing programs are Citywide; however, we are concentrating our efforts on areas needing to receive a very high priority for revitalization and the rehabilitation of housing occupied by elderly and handicapped

individuals. The 2014 census data shows that **44.19%** of the population within the city limits has been identified as low-to-moderate-income residents (households earning 80% or less than of the Area Median Income of \$54,000. The City's Low/Mod benefit this reporting period was **100%**.

The Community Development Department was able to complete many of its strategic community goals in this reporting period. The City of Goldsboro did revise its Recapture Provisions for HOME-Assisted Homebuyer Activities to reflect the guidance provided in the CPD 12-003 Notice during the reporting period. The City will continue to monitor the market for participation opportunities, particularly in the areas of eliminating homelessness and poverty in the community and work with the Down East Coalition to Eliminate Homelessness Continuum of Care.

Program activities projected this reporting period included housing rehabilitation, homebuyer assistance, affordable housing development, hazardous testing and clearance, acquisition, demolition and clearance, after-school enrichment/public services, CHDO housing construction, transitional housing, and public facility improvements. The following table and narratives provide a discussion of planned activities, projected expenditures and actual expenditures of funds.

II. FIVE-YEAR ASSESSMENT OF PROGRESS

Table 1A: Five-Year Objectives: Goldsboro Consolidated Plan 2010-2014

| ACTIVITY | 2010 Year 1 | | 2011 Year 2 | | 2012 Year 3 | | 2013 Year 4 | | 2014 Year 5 | | TOTALS | |
|---|----------------|--------|----------------|--------|----------------|--------|----------------|--------|----------------|---------------------|--------|---------------|
| | Goals | Actual | Goals | Actual | Goals | Actual | Goals | Actual | Goals | <mark>Actual</mark> | Goals | Actual |
| Housing Rehabilitation | 8 | 7 | 8 | 4 | 8 | 1 | 8 | 1 | 8 | 1 | 40 | 14 |
| Hazardous Material (Testing and Monitoring) | 4 | 11 | 4 | 5 | 4 | 6 | 4 | 16 | 4 | 12 | 20 | 50 |
| Homebuyer Assistance | 10 | 7 | 10 | 6 | 10 | 1 | 10 | 6 | 10 | 3 | 50 | 23 |
| Public Facilities and Improvements | 2 | 2 | 2 | 2 | 2 | 1 | 2 | 0 | 2 | 0 | 10 | 5 |
| Public Services | 6 | 5 | 6 | 5 | 6 | 5 | 6 | 4 | 6 | 6 | 30 | 25 |
| Demolition, and Clearance | 1 | 1 | 1 | 2 | 1 | 3 | 1 | 7 | 1 | 7 | 5 | 20 |
| CHDO Activity | 5 | 4 | 5 | 4 | 5 | 1 | 5 | 1 | 5 | 2 | 25 | 12 |
| Transitional Housing | 1 | 1 | 1 | 1 | 1 | 0 | 1 | 1 | 1 | 1 | 5 | 4 |
| Temporary Relocation | 2 | 2 | 2 | 0 | 2 | 0 | 2 | 0 | 2 | 0 | 10 | 2 |
| Affordable Housing Development | 0 | 0 | 0 | 0 | 1 | 1 | 0 | 0 | 0 | 0 | 1 | 1 |
| Urgent Repair (URP14) | 0 | 0 | 0 | 0 | 0 | 0 | 7 | 6 | 0 | 0 | 7 | 6 |
| Economic Development (ADLA, Inc Child Nutrition) | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 1 | 1 | 1 | 1 |

Please note: The Child Nutrition Program was able to assist 7,205 children and employ **eight (8)** part-time employees (**3-Cooks, 2-Drivers, and 3-Servers**).

III. ASSESSMENT OF ANNUAL PROGRESS

Table 1B: One-Year Progress within Goldsboro 2010-2014 Consolidated Plan

| ACTIVITY | 2014 Year 5 | Funds Expended | Percentage of Total Funds Expended |
|--|---|---------------------|--|
| | Number of Activities/Projects | | |
| Housing Rehabilitation | 1 | \$8,110 | 1% |
| Hazardous Material (Testing and Monitoring) | 12 | \$8,352 | 1% |
| Homebuyer Assistance | 3 | \$41,625 | 6% |
| Public Facilities and Improvements | WA Foster Center (Mult-Year Project) | \$453,050 | 63% |
| Public Services | 6 | \$55,438 | 8% |
| Demolition and Clearance | 7 | \$27,080 | 4% |
| CHDO Activity | 2 | \$94,615 | 13% |
| Transitional Housing | 1 | \$3,000 | 0% |
| Temporary Relocation | 0 | \$0 | 0% |
| Affordable Housing Development | 0 | \$0 | 0% |
| Urgent Repair (URP14) | 0 | \$0 | 0% |
| Economic Development (ADLA, Inc Child Nutrition) | 1 | \$26,542 | 4% |
| TOTALS | 32 | <u>\$717,811.65</u> | <u>100</u> % |

1. Homeowner Rehabilitation – CDBG, HOME, and URP13

As stated in Table 1B, the City of Goldsboro expended \$8,110 of CDBG funds during FY 2014-2015 to assist **one** (1) extremely low income minority household (<30% of AMI) by cleaning and restoring a ditch adjacent to the property owner's housing unit. The ditch cleaning and restoration project included, but was not limited to clearing and grubbing existing ditch; building a catch basic at existing culvert to tie in new pipe; installing pipe and drain gate; and filling the ditch. The ditch had expanded due to erosion and the property owner's house was two-feet away from collapsing into the ditch on the left side of the home. This project will allow the homeowner to occupy an affordable housing unit, which will continue to be livable and viable. Assistance was provided in the form of a zero percent-deferred payment loan.

2. Hazardous Material (Testing and Monitoring) – CDBG (<30% of AMI

During the course of most housing rehabilitation and/or demolition 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, during FY 2014-2015 **§8,352** in CDBG funds was spent on lead-based paint and asbestos inspections, risk assessments, and clearance testing for **twelve** (12) **housing units**. Of the twelve (12) housing units **six** (6) were identified as extremely low income, **two** (2) were identified as low income, **moderate** (1) were identified as moderate income, and **three** (3) were identified as non-low moderate housing unit.

3. Homebuyer Assistance - HOME

It is the City's intent to increase the supply of affordable housing units over an extended period of time. Therefore, the City utilized a total of \$41,625 in HOME funds to provide direct-subsidy assistance to a total of three (3) low-to-moderate income households to purchase single-family homes. Of the three (3) LMI households two (2) were identified as very-low income and one (1) was identified as low income. All three (3) homebuyer assistance projects were passed thru from developer assistance from the City's designated CHDO, Habitat for Humanity of Goldsboro-Wayne, Inc., in the form of zero percent deferred second mortgage loan. Sales price of homes purchased with assistance from this program cannot exceed the Federal Housing Administration (FHA) basic standard mortgage limit for Goldsboro. The average sale price was \$56,150 and the average mortgage loan was \$49,778. Loans are secured by a written Grant Agreement, Promissory Note, and Deed of Trust with the homebuyer that outlines recapture provisions in accordance with 24 CFR 92.253(a)(5)(ii). Liens coinciding with the loan terms are placed on all properties.

During the initial application process, all applicants were provided with information concerning the hazards of lead base paint if the homes were built before 1978 and required to sign a document verifying receipt of information. A Housing Quality Standards (HQS) inspection was conducted on all properties under contract for purchase that would be receiving assistance through the City. Any property that did not meet the guidelines of the HQS inspection was required to have all problems corrected and re-inspected prior to all loan closings.

All homebuyers are informed that should lead—based paint hazard be found, no federal dollars can be disbursed until a clearance is achieved. When deteriorated paint was found, the properties were tested for a lead-based paint hazard. The testing is paid as part of the hazardous material testing program under the CDBG Program. The sellers were made aware of the HQS and lead-paint hazards results and given the opportunity to make the required actions to the property to meet minimum housing standards of the City of Goldsboro or withdraw the property from participation in the Homebuyer Assistance program. A lead clearance was required prior to loan closing, when positive results were found.

In addition, each homebuyer was required to complete a Homebuyer Education course offered through the local office of Consumer Credit Counseling Service (CCCS) as a public service activity. Certificates of completion were submitted to our office for each file prior to loan closing. Homebuyers also received Pre-Purchase Counseling, which is also provided by certified Credit and Housing Counselors at CCCS.

The City, in conjunction with local non-profits, financial institutions, insurance companies, real estate firms, Wayne Community College, Legal Aid Services, Concerned Citizens of Wayne County, Goldsboro Housing Authority, and many other local entities, provided information and assistance to

residents of the Wayne County area concerning affordable housing opportunities for low-to-moderate income homebuyers. To provide information to the public, the Community Development staff participated in housing seminars and workshops conducted throughout the year in various locations.

A key factor for low-to-moderate income persons in buying a home has been credit issues. For this reason, it is necessary to discuss and help these individuals with budgeting issues and planning. Referrals were made to Consumer Credit Counseling Services (CCCS) for many of the potential homebuyers. CCCS provided education for potential homebuyers. CCCS also provided workshops and counseling sessions for potential homeowners and existing homeowners who wished to learn more about credit and budgeting issues. Additionally, having a certified housing counselor in the Community Development Office was an invaluable asset for the City of Goldsboro.

4. Public Facilities and Improvements - CDBG

The Public Facilities and Improvements activity is intended to improve the overall infrastructures within low-mod census tract areas within the city limits. During FY 2014-2015, the City expend \$453,050 in CDBG funds towards the design-build construction of a new recreational center (WA Foster Recreational Center) within a low/mod census area (Census Tract 15; Block Group 2), which will be located at Mina Weil Park, House Street, Goldsboro, NC.

5. Public Services Activities - CDBG

The City of Goldsboro annually sets aside a portion (15%) of its Community Development Block Grant entitlement and prior year program income to fund public service activities provided by local community based organizations and/or non-profits. Contracts were executed in the amount of \$55,438 to fund six (6) Public Service Agencies: the Boys and Girls Club of Goldsboro/Wayne County; Consumer Credit Counseling Services, (CCCS); Literacy Connection of Wayne County; Rebuilding Broken Places, CDC; Wayne Community College; and Wayne Initiative for School Health (WISH), to provide public service activities for the low-to-moderate-income residents within the city limits. These programs have proven to be very beneficial to the low-to-moderate-income residents of Goldsboro. Please refer to IDIS Report attachment, CDBG Summary of Activities (PR03), for additional information on each Public Service Agencies outcomes. All Public Services Agencies were monitored during the month of June 2015 and there were no finding and/or concerns discovered.

6. Demolition and Clearance - CDBG

The City of Goldsboro's Demolition and Clearance activity allows for the demolition of 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. During this reporting period the City disbursed \$27,080 in CDBG funds to demolish and clear seven (7) vacant substandard and dilapidated housing units to eliminate slum and blight conditions within low-mod census tract areas. One (1) housing unit was located in census tract 14:2 for which the total population is 1,225 and the percentage of low mod is 60%. One (1) housing unit was located in census tract 15:1 for which the total population is 1,260 and the percentage of low mod is 77.4%. Two (2) housing units were located in census tract 18:1 for which the total population is 1,730 and 0the percentage of low mod is 87%. Two (2) housing units were located in census tract 18:2 for which the total population is 985 and the percentage of low mod is 64.5%. One (1) housing unit was located in census tract 20:2 for which the total population is 215 and the percentage of low mod is 69.8%.

7. Community Housing Development Organization (CHDO) Assistance - HOME

The City is required to set aside a minimum of (15%) of its HOME funds for CHDO activities to provide decent and affordable housing or low-to-moderate income individuals and/or families. Currently the City has two certified CHDOs: Habitat for Humanity of Goldsboro-Wayne, Inc. and Rebuilding Broken Places, CDC. In FY 2014-2015, the City set-aside and expended \$71,665 in HOME funds toward CHDO activity to Habitat for Humanity of Goldsboro-Wayne, Inc., which constructed and sold two (2) new affordable housing units through the HOME funds provided. To date, Habitat for Humanity of Goldsboro-Wayne, Inc. has constructed and sold thirty-three (33) affordable housing units, in conjunction with the City's CHDO Activity. Habitat for Humanity of Goldsboro-Wayne, Inc. is continuously receiving applications and reviewing them to qualify buyers for the housing units that are built. No housing unit is built until a qualified buyer has been found. This eliminated having homes sitting vacant for long periods of time and being vandalized.

During this reporting period, Goldsboro Development Corporation was not recertified as a CHDO for the City of Goldsboro. Therefore, no addition units were purchased to add to the current rental stock. To date, Goldsboro Development Corporation, Inc. has purchased, renovated and rented a total of **sixteen (16)** dwellings. These dwellings have proven to be a great asset for low-income renters. All of the units are rented under the Section 8 guidelines and fair market rental rates.

8. Transitional Housing - CDBG

In FY 2014-2015, the City expended \$3,000 of CDBG funds towards transitional housing activities. The City of Goldsboro utilized Wayne Uplift Resource Association, Inc. as the subrecipient to assist **five (5)** female-headed households in need of transitional housing as a result of fleeing domestic violence situations. It should be noted that the **five (5)** female-headed households combine included **eleven (11)** children. The type of transitional housing assistance these household received included, but not limited to, rental and/or utility assistance, security deposits, furnishing, and other incidentals related to relocating to a safe housing unit.

Qualified and experienced program staff provided an array of victim-centered support services design to enable households to secure permanent housing and integrate back into the community. These services included 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.

The Angelic House, located at 1206 East Walnut Street (the previous location of the Wayside Fellowship Home) in Goldsboro, North Carolina is a transitional living facility with a mission to reduce the suffering and improve the quality of life for women with chemical dependencies and related problems. The house officially opened on February 24, 2011 with the admission of our first resident. Prior to the first consumer being admitted, there were collaborative efforts between the City of Goldsboro, Eastpointe and CommWell Health with the needed legal documents and staff working to ensure all efforts were in place to comply with the requirements of DHHS and the city of Goldsboro along with other agencies to ensure proper inspections, occupancy and other licensing requirements. The facility has a staff of four (4) full time staff and one (1) part- time staff. The Angelic House assisted fifteen (15) women with case management services, which included arranging, linking, and referring the women to other services that they are in need of to build skills and resource acquisition. The average length of stay was estimated at six months to one year.

Throughout this period, there has been close collaboration with Department of Social Services and Vocational Rehabilitation to assist the women with a variety of needs. The women also receive services from Employment Security Commission, Salvation Army and 6 out of 15 of the women are attending Wayne Community College.

9. Tenant Assistance and Relocation – CDBG and HOME

No tenant based rental or relocation assistance was provided through the CDBG or HOME programs. Furthermore, no displacement occurred as a result of a project assisted with funds under the CDBG or HOME programs. In order to satisfy requirements of the Uniform Relocation Act of 1970, as amended and Section 104(d) of the Housing and Community Development Act of 1974, the City Council of the City of Goldsboro adopted a Residential Anti-Displacement and Relocation Assistance Plan. The plan provides a description of how replacement units will be provided and steps that the City will use to minimize the displacement of persons from their homes.

10. Affordable Housing Development – HOME

During FY 2014-2015, the City did not expend HOME funds towards acquisition or new construction of rental or housing units as a major Housing Development. However, between FY11 and FY12 the City of Goldsboro expended \$262,500 in HOME funds and \$37,500 in local match funds from the City's General Fund to assist in the construction of a sixty (60) units rental affordable housing development for seniors, through the Highlands of Goldsboro, Inc. Sixteen (16) units were made affordable to extremely low-income seniors earning at or below 30 percent of the Area Median Income for Goldsboro; and forty-four (44) units were made affordable to very low-income seniors earning at or below 50 percent of the Area Median Income 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. The Highlands of Goldsboro project utilized low-income housing tax credits and project-based HUD assistance, which assures affordability for a minimum of twenty (20) years. The project was completed on May 9, 2013 and all three (3) designated HOME-Assisted units are currently being rented to very low-income residents (30%-50% of Area Median Income \$54,000).

11. Economic Development - CDBG

During this reporting period, \$26,542 of CDBG funds were disbursed for Economic Development activities. The City provided direct financial assistance to ADLA, Inc. for operating capital during the pilot program of the Child Nutrition Outreach and Education. ADLA, Inc. was able to employ eight (8) part-time employees (3-Cooks, 2-Drivers, and 3-Servers). This allowed ADLA to increase the number of low-to-moderated income individual that benefited from its' services. The program was able to assist an additional 7,205 children.

12. Neighborhood Revitalization Strategy – CDBG and HOME

During this reporting period, no CDBG or HOME funds were expended for the Downtown East Redevelopment Area. However, the City is still committed to concentrating its CDBG funds and efforts in the Downtown East Redevelopment Area to address issues of slum and blighting conditions, abandoned structures, infrastructure needs and economic development. To achieve this,

the City will use its CDBG and HOME funds to inject resources and investment into an identified area to work towards the goal of revitalizing the neighborhood and encourage outside investment and renewal into a declining neighborhood. This form of strategy, will allow the City to be eligible to apply for Section 108 loan funds to help finance the costs of the neighborhood revitalization activities.

13. Affirmatively Furthering Fair Housing – CDBG and HOME

The City recognizes the challenge faced by low-to-moderate income households to find housing they can affordable 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. Please be advised that the City's consultant, ASK Development Solutions, Inc. has completed the FY15-19 Analysis of Impediments (AI); it will be on a fifteen-day (15) public comment period September 25th – October 9th 2015. The City of Goldsboro's Community Development and Community Affair 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 Affair 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. During the 2014-2015 fiscal year, the Community Affair Department reported there were 51 housing complaints received and no fair housing discrimination complaints were received.

Affirmatively Furthering Fair Affordable Housing FY 2014-2015 Assessment

Impediment 1: Lack of Fair Housing Awareness and Education

Goal: To increase and education of Fair Housing laws

Action Taken: During National Fair Housing M

During National Fair Housing Month, the Community Affair and Community Development Department collaborate with community groups, realtors, landlords, potential homebuyers, lenders, and tenants to provide two (2) educational forums to highlight and insert the important of fair housing. The Community Development Department provided \$5,414.75 in CDBG funds to support and aid in the City's 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 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

Action Taken: The City of Goldsboro Community Development Department was an active member of the

Continuum of Care, the Down East Coalition to Eliminate Homelessness, which meets monthly. The City collaborated with Eastpointe, LME and other service providers to connect persons with specific disabilities and/or homelessness to acquire housing.

Impediment 3: Affordability

<u>Goal:</u> To increase availability of housing for the disabled and other special populations

Action Taken: The City expended a total of \$41,625 in HOME funds to three (3) low-to-moderate income

households as direct-subsidy assistance in the form of zero percent deferred second mortgages towards down payment and closing cost for principal reduction to increase buyer's affordability to purchase a home. In FY 2014-2015, the City set-aside and expended <u>\$71,665</u> in HOME funds toward CHDO activity to Humanity for Humanity of Goldsboro-Wayne,

Inc., which constructed and sold **two (2)** new affordable housing units through the HOME

funds provided.

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

<u>Goal:</u> To increase availability of mortgage financing for Minority and Women

Action Taken: The City funded \$5,000 to 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 also collaborated 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 worked 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

Action Taken: The City of Goldsboro expended **\$8.110** of CDBG funds during FY 2014-2015 to assist **one**

(1) extremely low income minority household (<30% of Area Median Income \$54,000) by cleaning and restoring a ditch adjacent to the property owner's housing unit. The ditch had expanded due to erosion and the property owner's house was two-feet away from collapsing into the ditch on the left side of the home. 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 for

which five (5) referrals were made this fiscal year.

AFFIRMATIVE MARKETING POLICY & IMPLEMENTATION PROCEDURES

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 win 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 subgrantee agencies.

B. <u>Informing the Public, Potential Tenants, Owners, and Investors about Federal Fair</u> 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. <u>Requirements for Investor/Owners to Inform the General Renter Public about</u> Available Rehabilitated or Newly Constructed Units

The City of Goldsboro will require project investors/owners to catty 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 log 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 NO. 1994 - 42

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:

- 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.

| This Resolution shall be this the 16 day | e in full force and effect from an | d after , 1994. |
|--|------------------------------------|--------------------|
| Approved as to Form Only: | Reviewed by: | |
| 11 11 10 C. 11/10; | | 10 0 |

City Attorney City Manager

14. Affordable Housing

Several characteristics of the housing market in Goldsboro directly impact provision of affordable housing. A large percentage of owner-occupied housing belongs to low-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 current 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 directs a combination of federal, state, and local funds toward achievement of these goals by funding single-family rehabilitation and new construction, infrastructure, and homebuyer assistance.

During this reporting period, the City of Goldsboro expended \$\frac{\\$42,009}{\}\$ of CDBG funds during FY 2014-2015 to assist **one** (1) extremely low income minority household (<30% of AMI) by cleaning and restoring a ditch adjacent to the property owner's housing unit. In addition, \$\frac{\\$41,625}{\}\$ in HOME funds to provide direct-subsidy assistance to a total of **three** (3) low-to-moderate income households to purchase single-family homes. Of the three (3) LMI households **two** (2) were identified as very-low income and **one** (1) was identified as low income. The City set-aside and expended \$\frac{\\$71,665}{\}\$ in HOME funds toward CHDO activity to Humanity for Humanity of Goldsboro-Wayne, Inc., which constructed and sold **two** (2) new affordable housing units through the HOME funds provided.

Worst-Case Needs. The other measure of accomplishment is the extent to which "worstcase" needs are met or at least are being addressed. 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 severely substandard housing. During FY 2014-2015, the City did not expend HOME funds towards acquisition or new construction of rental or housing units as a major Housing Development. However, between FY11 and FY12 the City of Goldsboro expended \$262,500 in HOME funds and \$37,500 in local match funds from the City's General Fund to assist in the construction of a sixty (60) units rental affordable housing development for seniors, through the Highlands of Goldsboro, Inc. Sixteen (16) units were made affordable to extremely low-income seniors earning at or below 30 percent of the Area Median Income for Goldsboro; and forty-four (44) units were made affordable to very low-income seniors earning at or below 50 percent of the Area Median Income 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. The Highlands of Goldsboro project utilized low-income housing tax credits and project-based HUD assistance, which assures affordability for a minimum of twenty (20) years. The project was completed on May 9, 2013 and all three (3) designated HOME-Assisted units are currently being rented to very low-income residents (30%-50% of Area Median Income \$54,000).

<u>Persons with Disabilities or Other Special Needs.</u> Persons with physical disabilities were primarily assisted through the City's Homeowner Rehabilitation Program. The City also referred **five (5)** disable persons to First Baptist Church to utilize the organization's funds to construct handicap ramps inside and outside the residence. Persons with other disabilities such as chronic substance abuse or mental illness were primarily assisted through the Continuum of Care programs.

<u>Section 215 Housing Opportunity Created.</u> The City of Goldsboro did not develop any Section 215 Housing Units during the reporting period.

15. Continuum of Care

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. The coalition has been able to assist **seven-four** (74) participants with housing since the administering of the grant begun. The coalition was awarded \$1.8 million in 2014-2015 from HUD via the Balance of State.

Down East Coalition to Eliminate Homelessness (Continuum of Care), Activities for 2014-2015

- The group consistently met on a monthly basis to strategically discuss issues pertaining to the homeless situation in our catchment area, which serves Duplin, Lenoir, Sampson, Wayne counties and the <u>City of Goldsboro</u>.
- The meetings consist of representation from the 4 counties and the <u>City of Goldsboro</u> by various agencies or entities such as the Department of Social Services, the Department of Health and Human Services, the Department of Corrections, local School Districts, local Sheriff Departments, the Faith Based community, local Housing Authorities, Local Service Providers, Emergency Shelters, landlords, etc. and any other agency or entity which have sincere interest in addressing the needs of the homeless in our community.
- At Ashebrooke Apartments, located in Goldsboro, **twelve** (12) target units are set aside for the disabled. These were created through a partnership between NC Housing Finance Agency and the NC Department of Health and Human Services to produce Housing Credit Properties for disabled adults. At Randall Place, which is also located in Goldsboro, **four** (4) units are set aside for the disabled.
- Various trainings, workshops, and presentations have continued to be afforded to providers, landlords, consumers, and the general public/community on behalf of the coalition by Eastpointe's Housing Coordinator. This is not only introducing these housing initiatives to all, but to also introduce to all the significant role(s) which we all have to play in order to be as effective, and efficient, toward appropriately addressing the homeless issues in our area. Continued training, awareness, and education will remain a strategy of the coalition.

• The Salvation Army, a Coalition member, was awarded in this reporting period **\$10,000** of Emergency Solution Grant for street outreach, emergency shelter, homelessness prevention, rapid re-housing assistance, and homeless management information systems.

The City of Goldsboro has several homeless shelters and these shelters provide primary information and data on the City's homeless population. In addition to maintaining ongoing records of homeless data, the shelters also participate in the "point in time" surveys. Persons with HIV/AIDS in Goldsboro are 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. There are currently no designated units for persons with HIV/AIDS in Goldsboro.

Numerous community-based agencies provide ongoing services to homeless persons and families and those nearing homelessness. These include the Wayne Uplift Resources Association, Churches in Action, the 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 is part of a network to help homeless persons through their crisis situations and move onto permanent housing, employment and healthy living situations.

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

- ♦ Transitional housing for 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

- ❖ Wayne Uplift Domestic Violence Program, administered by Wayne Uplift Resource Association, Inc., provides shelter for victims of domestic violence, primarily women and their children. They report that 95% of all domestic violence victims are female. Wayne Uplift Resource Association, Inc. offers a variety of programs and services in both English and Spanish that are dedicated to the promotion of safe, healthy families and the elimination of family violence. The programs include a 24-hour hotline in English and Spanish, Court Advocacy, a twelve-week Domestic Violence Empowerment/Parents Anonymous Program, a sixteen-week English and Spanish Parenting Class, a twenty-six week English and Spanish Abuser Treatment Class, and Parents Anonymous.
 - In FY 2014-2015, the City expended \$3,000 of CDBG funds towards transitional housing activities. The City of Goldsboro utilized Wayne Uplift Resource Association, Inc. as the subrecipient to assist **five** (5) female-headed households in need of transitional housing as a result of fleeing domestic violence situations. It should be noted that the **five** (5) female-headed households combine included **eleven** (11) children.
- ❖ The Fordham House operates three shelters with the capacity to serve approximately forty (40) persons. They are currently providing shelter for forty (40) individuals. The Fordham House provides other supportive services to the residents of the shelters as needed. Individuals are allowed to stay in for an indefinite period of time, which aides in reducing the number of people that are homeless. The Fordham House was able to assist approximately (224) individuals in 2014.
- ❖ The Salvation Army has the capacity to provide shelter for up to twenty-two (22) persons at any one time. The shelter also provide three meals per day, along with snacks, hygiene kits, transportation to DMV and bus station, bus tickets, medical assistance, rental, utility, and food assistance. The Salvation Army, a Coalition member, was awarded in this reporting period \$10,000 of Emergency Solution Grant for street outreach, emergency shelter, homelessness prevention, rapid re-housing assistance, and homeless management information systems.
- ❖ The 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.
- ❖ WAGES Community Services Block Grant Program (CSBG) offered the homeless and persons threatened with homelessness assistance. WAGES Head start and Early Head start Program has a policy that gives children priority if they are homeless. WAGES held two (2) clothing give-always during the year, the event was open to the public, we were sure that some of the individuals that attended were homeless do to the fact that they asked for only what they could carry on their backs.

- ❖ Wayne County Department of Social Services offered the homeless and persons threatened with homelessness assistance through programs such as Aid to Families with Dependent Children (AFDC), Food Stamps, Medicaid, Mental Health Services, Substance Abuse programs, and referrals to housing and other services.
- ❖ The Goshen Medical Center (GMC) Eastpointe homeless project provided comprehensive health care and mental health services to the homeless and migrant population. To accomplish these goals, GMC-Eastpointe collaborated with the County Health Department, Wayne County Social Services, Wayne County Housing Authorities, Wayne Uplift Resource Association, Inc., and the Fordham House. Since their three sites, GMC-Eastpointe, GMC-Salvation Army, GMC-Goldsboro, located near a military base, veterans and their family members also use the extensive services provided.
- ❖ Wayne County Public Schools The Wayne County Public School System, the Local Education Agency (LEA), provided educational services to children of homeless families through the McKinney-Vento Act Homeless Services Program. The homeless services that were provided by the program are listed in the table on the page 26. For the 2014-2015 school year, (214) homeless students were identified within the schools located within the City of Goldsboro. This included student counts from Carver Heights, Dillard, Goldsboro High, Greenwood, Meadow Lane, North Drive, School Street School, Wayne School of Engineering at Goldsboro High, and Wayne Early Middle College, and Wayne Middle/High Academy.

Table 2: Wayne County Public Schools - McKinney-Vento Act Homeless Services

| | Homeless Services | Evidence |
|------|---|--|
| 1. | The LEA implements procedures to address the | Enrollment/intake forms |
| 1 | identification of Homeless children and youth according to | Tracking forms |
| | statutory definitions. | Notes/logs/documentation of community contacts |
| | | 1 totals logs, documentation of community conducts |
| 2. | The LEA implements procedures to address the immediate | Agendas/memos/handbooks for training sessions |
| | enrollment of homeless children and youth according to | <i>g. g</i> |
| | statutory requirements. | Posters/brochures/flyers |
| 3. | The LEA implements procedures to address the retention | Memos |
| | of homeless students. | Information for parents |
| | | Needs assessment documents |
| | | District Board policies |
| | | Tracking of transportation to school of origin |
| 4. | The LEA provides information dissemination both | Posters/brochures in schools/agencies |
| | internally and externally to ensure appropriate | Č |
| | implementation of the statute. | Agendas/memos/handbooks for training |
| 5. | The LEA ensures that there is coordination of programs | Formal/informal agreements with agencies |
| | and services to homeless students and families. | Documentation of coordinated services |
| 6. | The LEA ensures that comparable Title 1, Part A services | Title I budget |
| | are provided to homeless students attending non-Title 1 | Expenditure reports |
| | schools. | Copy of Title I plan |
| | | Copy of Consolidated Plan |
| | | |
| 7. | The LEA has a system for ensuring prompt resolution of | Dispute resolution policy |
| | disputes. | Dispute resolution log |
| 8. | The LEA provides transportation for homeless students to | Transportation logs |
| | the school of origin | |
| 9. | The LEA provides prompt enrollment in the Child | Child Nutrition roster |
| | Nutrition Program for homeless students. | Homeless student referral |
| | | |
| 10. | Professional development and other activities for educators | Measurable Outcomes |
| | and pupil services personnel that are designed to heighten | Increase in numbers of public school personnel who are |
| | the understanding and sensitivity of such personnel to the | aware of and sensitive to the needs of homeless children and |
| | needs of homeless children and youths, the rights of such | youth. |
| | children and youths under this subtitle, and the specific | |
| | educational needs of runaway and homeless youths. | Increase in awareness and sensitivity training opportunities for |
| | | school personnel and community. |
| 11 / | Th | Measurable Outcomes |
| 11. | The provision of education and training to the parents of | |
| | homeless children and youths about the rights of and resources available to such children and youths. | Brochures, newsletters, posters, etc. distributed to parents and providers, on the rights of homeless children to an appropriate |
| | resources available to such children and youths. | |
| | | education. |
| | | Increase in homeless parent and youth calls regarding rights and resources. |
| | | Website listing of homeless education services and links. |
| | | Increase in percentage of homeless families involved in school |
| | | enrollment decisions. |
| 12. | The adaptation of space and purchase of supplies for any | Measurable Outcome |
| | non-school facilities made available under subsection (a) (2) | Increase in number of shelters with homework rooms, libraries, |
| | to provide services under this subsection. | and tutorial supplies. |
| | P-020 Del 11000 miles mile del del del del del del del del del d | |
| 13. | The provision of school supplies, including those supplies to | Measurable Outcome |
| | be distributed at shelters or temporary housing facilities, or | Increase in number of homeless children with supplies needed |
| | other appropriate locations. | to attend school. |
| | * K - K | |
| | | 1 |

16. Other Actions and Accomplishments

Public Housing. The Goldsboro Public Housing Authority (PHA) currently subsidizes and manages **1,225** units (Table 4) of rental housing, which represents **14.7**% of the City's rental housing stock in eight developments. This includes **100** units designated for the elderly. The Housing Authority also administers **237** Section 8 vouchers for City residents, which includes **forty-nine** (**49**) for the elderly. The Housing Authority continues to reassess and redefine its

asset goals and agency mission. The focus is on creating and implementing strategies, which result in providing quality, mixed-income developments of choice that supports the operational needs of the Authority. The private management model plan has been implemented at each public housing development. All maintenance, applications, re-certifications and management in each development are the responsibility of the Property Manager who supervises the entire apartment community. The Housing Authority constructed **six** (6) units on Charles Street to replace units that were demolished on Elm Street.

Public Housing Waiting List: The waiting list for housing authority reflects a total of **162** households for public housing and **297** households on the Section 8 waiting list (Table 3). For public housing, the average wait is three to four months for elderly units and one to seven months for family properties.

Table 3: Public Housing Waiting List

| | | Totals | 0-bdrm | 1-bdrm | 2-bdrm | 3-bdrm | 4-bdrm+ |
|------------------------------------|-------------|--------|--------|--------|--------|--------|---------|
| Total Number on Waiting List | Percentages | 162 | 0 | 89 | 58 | 11 | 4 |
| Elderly | 3% | 5 | 0 | 5 | 0 | 0 | 0 |
| Family | 97% | 157 | | 84 | 58 | 11 | 4 |
| Non-Family | | | | | | | |
| | | | | | | | |
| | | | | | | | |
| Average Income | | | | | | | |
| Below 30% | 36% | 59 | 0 | 17 | 35 | 6 | 1 |
| 30-50% | 32% | 51 | 0 | 39 | 9 | 2 | 1 |
| 50%+ | 32% | 52 | 0 | 33 | 14 | 3 | 2 |
| | | | | | | | |
| Race | | | | | | | |
| Black | 94% | 152 | 0 | 84 | 56 | 9 | 3 |
| White | 6% | 10 | 0 | 5 | 2 | 2 | 1 |
| Other | 0% | 0 | 0 | 0 | 0 | 0 | 0 |
| | | | | | | | |
| Ethnicity | | | | | | | |
| Hispanic | 0% | 0 | 0 | 0 | 0 | 0 | 0 |
| Non-Hispanic | 100% | 162 | 0 | 89 | 58 | 11 | 4 |

The Housing Authority actively sought after resident's participation in the management of the Goldsboro Housing Authority's housing inventory through organized resident committees, boards, and forums that provide vehicles for constructive ideas and concerns that positively influence resident life.

The City of Goldsboro actively encouraged 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 has coordinate and optimizes 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 supported 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 provided 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 worked 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 also provided ongoing 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.

Table 4: Profile of Goldsboro Housing Authority Units

| | | | Public | Housing | ; | | | | |
|-----------------------|--------|-------|---------|----------|----------|------------|------|----------|-----------|
| DEVELOPMENT | YEAR | UNITS | | B | EDROOM D | ISTRIBUTIO | N . | | OCCUPANCY |
| | BUILT | | 0-BR | 1-BR 2 | 2-BR 3-1 | BR 4-BI | 5-BR | | RATE |
| ELDERLY PROPERTIES | | | | | | | | | |
| Fairview East | 1974 | 50 | 28 | 22 | 0 | 0 | 0 | 0 | 100% |
| West Haven | 1974 | 50 | 32 | 18 | 0 | 0 | 0 | 0 | 100% |
| Subtotal | | 100 | 60 | 40 | 0 | 0 | 0 | 0 | |
| FAMILY PROPERTIES | | | | | | | | | |
| NC015000100 | | | | | | | | | |
| Fairview Apartments | 1951 | 253 | 0 | 36 | 114 | 79 | 24 | 0 | 99% |
| NC015000200 | | | | | | | | | |
| Lincoln Apartments | 1951 | 347 | 0 | 54 | 144 | 97 | 52 | 0 | 99% |
| NC015000300 | | | | | | | | | |
| Woodcrest Terrace | 1962 | 75 | 0 | 20 | 30 | 14 | 8 | 3 | 100% |
| Elmwood Terrace | 1962 | 150 | 0 | 20 | 70 | 40 | 14 | 6 | 99% |
| Little Washington | 1978 | 50 | 0 | 0 | 0 | 30 | 20 | 0 | 100% |
| Total | | 275 | 0 | 40 | 100 | 84 | 42 | 9 | 99% |
| NC015000400 | | | | | | | | | |
| West Haven Apartments | 1974 | 250 | 0 | 42 | 96 | 60 | 36 | 16 | 99% |
| Subtotal | | 1125 | 0 | 172 | 454 | 320 | 154 | 25 | |
| TOTALS | | | | | | | | | |
| PUBLIC HOUSING | | 1225 | 60 | 212 | 454 | 320 | 154 | 25 | |
| | | | Section | 8 Progra | m | | | | |
| PROGRAM | ALLOCA | ATION | 1-BR | 2-BR | 3-BR | 4-BR | 5-BR | LEASE-UI | RATE |
| Certificates/Vouchers | 23 | | 84 | 71 | 39 | 6 | 1 | | 92% |
| | | | | | | | | | |
| | | | | | | | | | |

Improved Public Housing and Resident Initiative. The City continued to 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 applicants have applied for assistance, but due to credit issues, their loans were not approved. Except for one (1) low-to-moderate income person that became homeowner due to the City set-aside and expended \$27,740 in HOME funds toward CHDO activity to Habitat for Humanity of Goldsboro-Wayne, Inc. For this reason, the Community Development Office has been assisting applicants in locating agencies that are available for financial management and counseling as well as providing some counseling in our office. A contract was 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. After these issues are resolved, the applicants plan to continue their dream of homeownership.

Local Institutional Structure. The City of Goldsboro, through its Planning and Community Development Department, shall administer and monitor the use of formula grant program(s) funding as provided from the U.S. Department of Housing and Urban Development for the purpose of implementing the City's yearly Action Plan. At the time of this submission, the City of Goldsboro is not aware of any gaps in its institutional structure that would impair its ability to carry out its five-year strategy and/or Annual Action Plan.

The City of Goldsboro, as specified in the City's annual action plan, subcontracted with area non-profit organizations, and was represented on various boards, committees and commissions that undertake some of the program aspects of the City's five-year strategy and/or Annual Action Plan. As funds were limited and as program source guidelines dictate, this networking by the City is vital to the depth and effectiveness of its overall housing and community development strategies.

The City of Goldsboro actively encouraged 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 of Goldsboro adopted the following initiatives for which the City coordinated and optimized the efforts of all parties that participated in the implementation of the City's five-year strategy and/or Annual Action Plan:

1. Preservation of the City's housing stock

- The City will continue single-family owner-occupied and rental rehabilitation program(s) that assist low and moderate income households in maintaining decent housing through the use of available program funds and program guidelines;
- The City will support the efforts of the Goldsboro Housing Authority in maintaining the integrity of the public housing inventory to provide safe, decent and affordable housing opportunities for qualifying residents.

2. Affordable housing opportunities

• The City will assist non-profit housing providers with the acquisition and rehabilitation of existing substandard housing to provide quality affordable homeownership opportunities for low and moderate income families;

- The City will support the efforts of the Goldsboro Housing Authority in applying for grants to continue rental assistance programs that provide decent affordable housing opportunities for the City's low-income residents;
- The City will continue to identify potential housing sites that are conducive to the future development of affordable housing and are in compliance with location criteria established by HUD;
- The City will continue to encourage private, for-profit, builders to join in publicprivate affordable housing ventures that provide additional affordable housing opportunities within the City;
- The City will assist certified CHDOs in their efforts to provide affordable housing opportunities for qualifying low to moderate income persons meeting HUD's assistance criteria; The City will participate in the North Carolina Housing Finance Agency's Down Payment Assistance and Mortgage Financing Program that provide affordable homeownership opportunities to qualifying first time homebuyers.

Reduce Lead-based Paint Hazards. Lead-Based Paint Inspections, Testing, Abatement and Monitoring are required segments of the City's Housing Rehabilitation Program. Policies and procedures, establishing specific criteria for testing and abatement of lead-based paint and asbestos are in place. All units scheduled for rehabilitation through the City's programs are tested for lead if they were built prior to 1978. Lead-based paint notifications and brochures are provided to all housing rehabilitation and homebuyer assistance applicants during the application process.

The City of Goldsboro maintains and uses a list of qualified and certified lead-based paint inspectors and abatement contractors for its rehabilitation program. Additionally, The City works with the Wayne County Health Department and their Environmental Health Department when any owner occupied home has children who have been tested for elevated blood levels. Every effort is made to remove the families from the environment until the home is made lead safe. Continued efforts are being made to ensure the hazard of lead-based paint is reduced in all units assisted with federal funds.

The City will use portions of available CDBG and HOME funds to remedy lead based paint hazards that have been identified by guidelines established by the U.S. Department of Housing and Urban Development as posing health threats to occupants of housing undergoing rehabilitation in conjunction with one of the City's impacted housing rehabilitation programs, in accordance with accepted lead abatement practices. This reporting period, **twelve** (12) homes were tested for lead-based paint and all **twelve** (12) were demolished and cleared.

Reduce Poverty Level. The City will continue to participate with local agencies, faith-based or church groups, and non-profit organizations that provide shelter and transitional housing opportunities that benefit homeless and transient families and individuals. The City will support the efforts of the Salvation Army and all other organizations that aid homeless persons. In addition, the City will support the efforts of non-profit organizations that provide enrichment

program designed to develop individual coping skills for productive adult lives. The City will support the efforts of Eastpointe, LME, a non-profit organization that is the lead agency for the Down East Coalition to Eliminate Homelessness Continuum of Care initiative that benefits homeless persons and families in Goldsboro and Wayne County. The City will continue to promote a healthy business environment that encourages economic development that provides meaningful employment opportunities for the residents.

Program and Comprehensive Planning Compliance. As a means of ensuring compliance of CDBG and HOME program requirements for funded activities, the City of Goldsboro has established a monitoring plan to be used for Sub-recipients, CHDOs, Homebuyers and Rental HQS compliance. Sub-recipients and CHDOs were required to submit quarterly and end of year reports on their program and activities. These reports included relevant information such as the number units complete and/or persons served; the amount of funds expended or obligated; number of cases processed; factors which adversely affect or hinder implementation; accomplishments of program and/or activities.

The Community Development staff conducted periodic review of Sub-recipients' program activities for performance and compliance. CHDOs were required to undergo a recertification review, which is required on a yearly basis. The staff prepared monthly progress reports for review by the Development Services Director, the City Manager, and the City Council.

The City of Goldsboro maintained individual files and information on all program participants. Data concerning household size, income levels, racial identification, source of program funding, location, and other relevant information was contained within these files. This data is available on program participants, subject to federal, state, or local confidentiality requirements.

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. For HOME-assisted homebuyers that the Community Development Department did 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 was maintaining the housing unit as their principal residence. The Community Development staff mailed 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. For HOME-assisted homebuyers whom fail to return the signed statement, staff made a follow up to determine if the homebuyer was still residing in the assisted unit.

Goldsboro Development Corporation currently has **sixteen** (16) houses in the rental program. During this reporting period, **four** (4) houses were inspected. All required repairs were completed as of the end of this reporting period.

MONITORING PLAN

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 increase 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 sub-recipient, 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 from 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 unites 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

<u>In-house Cost and Productivity Review</u>

- 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

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 as requested as request for payments are 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 of each program year |
|---|-------------------------------------|
| 2. Consumer Credit Counseling Services (CCCS) | Month of June of each program year |
| 3. Literacy Connection of Wayne County | Month of June of each program year |
| 4. Rebuilding Broken Places, CDC | Month of April of each program year |
| 5. Wayne Community College (WCC) | Month of April of each program year |
| 6. WISH School Health Program (WISH) | Month of April of each 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.

17. Leveraging of Non-Federal Funds

The City of Goldsboro used its federal HOME dollars <u>\$71,665</u> and local dollars, in conjunction with private funds provided by Habitat of Humanity <u>\$228,518</u>; North Carolina Housing Finance Agency <u>\$70,150</u>; and Homebuyer contribution <u>\$2,250</u> for a total of <u>\$341,643</u> in first and second mortgages to low-to-moderate income citizens this reporting period. The amount of non-federal funds represented <u>\$269,978</u> or 79% of the total amount of <u>\$341,643</u> expended through federal and non-federal funds made available to low-to-moderate income families to become first-time homebuyers.

This combined effort and collaboration increased the scope of our housing activity and provided housing solutions that would not have been possible without the partnerships. Although the City budgeted **\$19,567** from General funds for local HOME match, the City was granted 100% HOME Match Reduction. Therefore, the City was not required to provide local matching funds for FY14 HOME allocation.

18. Citizen Comments and Participation

<u>Participation</u> -- The City of Goldsboro provided for and encouraged citizen participation in the development and implementation of the Consolidated Plan and any subsequent amendments, Action Plans and CAPER. Particular emphasis was placed on participation by persons of low-to-moderate income who are residents of low and moderate-income neighborhoods and/or slum and blighted areas, and residents of public housing.

Access and Publishing of Action Plan and CAPER -- The City of Goldsboro provided citizens with reasonable and timely access to the Annual Action Plan and CAPER related to the City's proposed and actual use of funds. This was done through public meetings scheduled by the City, which were advertised in the local newspaper Goldsboro News-Argus and the City's website www.goldsboro.nc.gov. Meetings were held within the City limits in or near areas identified as slum and blighted and/or areas of predominantly low-to-moderate income persons. All meetings of the City were accessible to persons with disabilities. A summary of the City's 2014-2015 Action plan was published in the Goldsboro News Argus on March 6, 2014. The advertisement for the CAPER fifteen (15) day-review was published in the Goldsboro News Argus on August 18, 2015. Copies of the Plan were made available upon request in accordance with City policies regarding making copies.

<u>Public Hearings</u> -- The City of Goldsboro provides for a minimum of two public hearings and/or meetings per year to obtain citizens' views and to respond to proposals and questions at all stages of the compilation of the Action Plan. A public hearing will be held on Monday, September 21, 2015 at 7:00 pm during the regular meeting of the Mayor and City Council to allow citizens to review the CAPER.

The City of Goldsboro will make available a translator for non-English speaking residents in the case of public hearings when the City was notified that a non-English speaking resident would be in attendance. An interpreter will be available for hearing-impaired residents. Such requests must be made to the City Clerk's office no later than 4 days prior to the public hearing.

Comments -- Availability of the CAPER was publicized in the Goldsboro News-Argus detailing where the Plan can be reviewed and posted on the City's website www.goldsboronc.gov. Review of this report will be made available for comments from September 4, 2015 through September 21, 2015. **The City of Goldsboro has not received any comments to incorporate into the draft report of the 2014-2015 CAPER.** The CAPER 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 Affair 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.

19. Self-Evaluation of Annual Performance

The City of Goldsboro was able to complete many of its strategic community goals and objectives planned for the 2014-2015 program year and for the 2010-2014 Consolidated Plan reporting period; all activities were consistent with the Consolidated Plan. The City will continue in its efforts to address the needs of low-to-moderate income citizens. The City will also continue to look for ways to improve its progress, seek additional resources, and work closely with agencies in the community who share the City's commitment to housing and rebuilding our communities.

Goldsboro's Consolidated Plan was developed with the objective of the Housing and Community Development Act clearly in mind and has been referred to regularly to ensure in compliance with the objectives of the Act. CDBG regulations require that a grantee disburses its funds on a timely basis and not have more than 1.5 times its current allocation in its line of credit 60 days prior to the end of its program year. The deadline for meeting the timeliness test for fiscal year 2014 was May 2, 2015. During this reporting period, the City met the timely expenditure test with a **0.81** ratio.

Program activities are administered by the Community Development staff with assistance from the Planning, Engineering, and Inspections Department as well as the Development Services Director, City Manager, and City Clerk. A great number of citizens were positively impacted by the various CDBG and HOME programs administered, which resulted in decent, safe, and sanitary housing for many of the City's low-to-moderate income citizens.

Given the continuing housing crisis and recession, the fourth year of the 2010-14 Consolidated Plan produced encouraging results. Although assistance to first-time homebuyers and owner-occupied rehabilitations slowed considerably, the activities carried out under Public Services enhanced the quality of life for many families and academic performance for many disadvantaged and low-to-moderate income youth throughout the City. The housing crisis continues to slow construction of new single-family housing, with the exception of Habitat for Humanity, which serves as its own lender.

The City met the HOME commitment and drawdown deadlines for FY13, namely commitment of HOME entitlement funds within two years, reservation of at least 15% of HOME funds to CHDOs within two years, and drawdown of HOME entitlement funds within five years. The City continued reviewing its procedures related to grant reconciliation and implementing procedures to ensure effective monitoring for allocation of expenditures, as well as, developing and implementing strategies to improve the City's overall performance.

IV. CDBG PROGRAM NARRATIVES

1. Funds to Goals and Objectives - CDBG

The City of Goldsboro achieved most of its goals and objectives planned for the 2014-2015 program year; all activities were consistent with the Consolidated Plan. During this reporting period, the City of Goldsboro disbursed \$644,558 in CDBG funds for the homeowner rehabilitation, public facilities and improvements, public services, hazard material testing/clearance, and transitional housing program, including program-operating costs (planning and administration). Program accomplishments have been summarized in Section III Assessment of Annual Progress. Grantee funds were used exclusively to meet national objectives.

2. Changes in Program Objectives

Although, the City's efforts are being focused on stretching limited funds to "do more with less." There was one change this program year from previous program years. The City used \$26,542 of CDBG funds for Economic Development activities, see page 9 for details.

3. Anti-displacement and Relocation

In order to comply with the requirements of Section 104(d) Housing and Community Development Act of 1974, the City of Goldsboro intends to minimize any displacement resulting from any HUD activities. However, should any displacement occur as a result of a HUD activity, the City intends to follow the regulations for displacement and relocation as described in 24 CFR 570.606. Should any real property acquisition result because of a HUD assisted activity, the guidelines of 49 CFR 24 subpart b will be followed.

DISPLACEMENT AND RELOCATION STRATEGY AND REGULATIONS

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 rehabled first and then allow tenants to move into rehabled 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, HUO 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]

4. Program Income

The City receipted <u>\$13,327</u> in CDBG program income in the Integrated Disbursement and Information System (IDIS). All of the program income was expended as required by the established guidelines. CDBG and HOME program incomes are budgeted for eligible program activities and drawn on a first-in, first-out basis.

5. Loans and other receivables

CDBG and HOME: Total number of Loans outstanding and principal balance owed as of the end of this reporting period, July 1, 2014 through June 30, 2015. Of the number of loans listed below, there is one loan currently in default. The Community Development staff has been working with customers who have fallen behind in the monthly payments due to the economic down turn.

| LOAN TYPE | No. of Loans | Loan Balance |
|---------------------------------|-----------------|-----------------|
| Homeowner Rehab - Deferred | 38 | \$593,575 |
| | | |
| Homeowner Rehab - 0% | 0 | \$0 |
| | | |
| Homeowner Rehab - 2% | 8 | \$180,743 |
| | | |
| Rental Rehab Loan - 2% | 0 | \$0 |
| | | |
| Homebuyer Assistance - Deferred | 48 | \$554,430 |
| | | |
| Outstanding Loan Amount | 94 | \$1,328,748 |

6. Neighborhood Revitalization Strategies

As previously stated, no CDBG or HOME funds were expended for the Downtown East Redevelopment Area this reporting period. However, the City is still committed to concentrating its CDBG funds and efforts in the Downtown East Redevelopment Area to address issues of slum and blighting conditions, abandoned structures, infrastructure needs and economic development. To achieve this, the City will use its CDBG and HOME funds to inject resources and investment into an identified area to work towards the goal of revitalizing the neighborhood and encourage outside investment and renewal into a declining neighborhood. This form of strategy, will allow the City to be eligible to apply for Section 108 loan funds to help finance the costs of the neighborhood revitalization activities.

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 <u>eliminating</u> 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 from the public service cap (24 CFR 570.204(b)(2)(ii).

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

- (1) **Boundaries:** The grantee has identified the neighborhood's boundaries for which the strategy applies. All areas within those boundaries must be contiguous;
- (2) **Demographic Criteria:** The designated area must be primarily residential and contain a percentage of low-and moderate- income residents that is equal to the "upper quartile percentage" (as computed by HUD pursuant to (24 CFR 570.208(a)(l)(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.

V. HOME PROGRAM NARRATIVE

1. Funds Goal and Objectives - HOME

During this reporting period, the City of Goldsboro disbursed \$127,680 in HOME funds for eligible activities under the HOME Program. HOME funds were expended for the homeowner rehabilitation, CHDO activity and operating, direct-subsidy assistance for homebuyer assistance, and rental affordable housing development, including program-operating costs (planning and administration). Program accomplishments have been summarized in Section III Assessment of Annual Progress. Grantee funds were used exclusively to meet national objectives.

2. HOME Match Report

For fiscal year 2014-2015 HOME funds, the City received a HOME Match Reduction of a 100% due to fiscal distress; therefore, the City was not required to provide local matching funds for FY14 HOME program. However, the City did budget in the 2014-2015 Action Plan for \$19,957 for new match dollars. Therefore, it was anticipated that these funds would be available to perform housing and non-housing related activities. These activities included homeowner rehabilitation, CHDO activity and operating, direct-subsidy assistance for homebuyer assistance, and rental affordable housing development, including program-operating costs (planning and administration). The match report is attached as Attachment 3.

3. Minority/Women Business Enterprise (MWBE) Report

Minority/Women Business Enterprise (MWBE) participation for all programs is now only reported on the HUD 2516 form to be submitted by October 15th. Although much focus has been on implementing Section 3 program goals, there is much overlap between Section 3

contractors and vendors and M/WBE eligible contractors and vendors. Both elements are coordinated with the M/WBE program office. A cross-certification, single-form process was established to facilitate certification for those who may be eligible under both categories.

To comply with federal regulations, the City Council adopted a Resolution establishing a verifiable goal of fifteen percent (15%) of the total dollar amount of all contracts for participation by minority and/or women's businesses in the awareness of contracts for CDBG and HOME Program activities. The Community Development staff has compiled a list of minority and female contractors, subcontractors, and suppliers in our area and when advertising for bids on CDBG or HOME projects, we advertise for the purpose of soliciting minority and female contractors. Bid packages were provided to each minority and female contractor on our list as well as advertisement in the local newspaper welcoming minority and female contractors' bids.

MWBE PROGRAM POLICY AND PROCEDURES

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 identity 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

4. Results of Onsite Inspections of HOME Rental Units

Pursuant to loan agreements between the City and borrowers, property assisted with HOME, CDBG and/or local funds must be maintained in compliance with Section 8 Housing Quality Standards (HQS) and the Minimum Housing Code of the City. The Community Development and Inspection Department inspect a sample of units of property in the loan portfolio annually. Goldsboro Development Corporation currently has **sixteen** (16) houses in the rental program. During this reporting period, **four** (4) houses were inspected. All required repairs were completed as of the end of this reporting period. The Highlands of Goldsboro currently has **three** (3) designated HOME-Assisted units in the rental program. During this reporting period, **three** (3) apartments were inspected. There were no required repairs identified this reporting period.

The City of Goldsboro will use the resale provision to recoup the full HOME developer-subsidy assistance, which will be the amount remaining on the affordability period at time resale is trigger; to include, any payments made or pro rata reduction amount applied during the affordability period. This restriction is enforceable by a written Subordination and Standstill Agreement, Promissory Note, Deed of Trust, and Deed Restriction with the developer.

5. Assessment of Affirmative Marketing Plans Effectiveness

In accordance with the provisions of the HOME Final Rule, 24 CFR 92.351, the City of Goldsboro has formally adopted a Resolution approving the City's Affirmative Marketing Policy and Implementation Procedures. The purpose of the City's Affirmative Marketing Policy is to ensure those persons of similar income levels in the same housing market area have a like range of choices in housing, regardless of race, color, religion, familial status, handicap, sex or national origin.

The City of Goldsboro's Community Development and Community Affair Department assessed the effectiveness of the City's Affirmative Marketing plan as program year 2014-2015 and determined that the City's current Affirmative Marketing Plan is effectively meeting the goals and objectives. It was also determined that the Affirmative Marketing plan did not waste the City's time and efforts devoting energy to trying to persuade individuals who simply do not want to move and are highly unlikely to be convinced otherwise. Instead, the City's plan targeted and informed members of underrepresented race, color, religion, familial status, handicap, sex or national origin who would be interested in moving, but who simply lack information regarding available units or would be much more likely to move if provided with mobility assistance. These individuals are most likely to be ready and able to make a move work and to have the resources necessary for a successful transition.

6. Program Income

The City receipted <u>\$8,586</u> in HOME program income in the Integrated Disbursement and Information System (IDIS). All of the program income was expended as required by the established guidelines. HOME program incomes are budgeted for eligible program activities and drawn on a first-in, first-out basis. No HOME program income was utilized towards planning and administrative costs.

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.

Also, full versions of the CAPER with attachments are located at the following locations:

Planning Department and the Office of the City Clerk (City Hall Annex, 200 North Center Street)

Community Affair Department (Historic City Hall Building, 214 North Center Street),

Wayne County Public Library (1001 East Ash Street)

Goldsboro Housing Authority (1729 Edgerton Street)