

Required Elements

1. If the jurisdiction plans to dedicate funds within a local targeted area, did the jurisdiction provide the boundaries of the targeted area and an estimate of the percentage of funds it plans to dedicate to target area(s)? (91.220(f))

Page(s) :

Comments: *I did not find a response to this item.*

From page 7:

CDBG funds will be used to address high priority needs, which were identified via a comprehensive community needs identification and prioritization process. Efforts will not necessarily be targeted geographically. The City's Neighborhood Services Program, which operates as a low-moderate income area benefit project providing public facilities and other special projects that work together to increase vitality and sustainability of at-risk, targets neighborhoods in Appleton's central city.

Additional information: The map included on page 5 of the AAP shows the LMI tracts in Appleton. The Neighborhood Services Program will work in the central city area which can be roughly described as census tracts 101, 102 and 103. The Neighborhood Services Programs award is approximately 10% of the \$430,000 estimated award.

1. If the plan includes a Neighborhood Revitalization Strategy Area or Areas, did the jurisdiction identify the census tracts for each NRSA and an estimate of the percentage of funds it plans to dedicate to the NRSA(s)?

Page(s) :

Comments: *I did not find a response to this item.*

The City of Appleton's plan does not include a NRSA.

2. Did the jurisdiction explain how federal funds will leverage resources from private and non-federal public sources?

Page(s) :

Comments: *I did not find a response to this item.*

From page 12:

Private Funding Sources

Numerous local private sector entities offer additional monetary assistance and in-kind services as leverage for projects that address priority needs. Local funding/leverage for meeting priority community development needs comes from several sources, including foundations and private companies. The following list represents only a sampling of the larger local funding/resource providers:

- United Way of the Fox Cities
- Community Foundation Fox Valley
- J. J. Keller Foundation
- U.S. Oil/Schmidt Family Foundation
- Bemis Foundation
- Community First Credit Union
- Affinity Health Systems
- Kimberly Clark Corporation
- Menasha Corporation
- Thrivent Financial for Lutherans
- UW-Fox Valley
- Fox Valley Technical College

Non-Federal Public Sources

City of Appleton subrecipient agencies utilize various non-federal public sources, namely in the homeless grant funding arena. Specifically, the State's Transitional Housing Program (THP) and Homeless Prevention Program (HPP) are awarded in tandem with federal ESG funds, while the State Shelter Subsidy Grant (SSSG) is administered separately. In addition, several county health and human service grant programs – in Outagamie, Winnebago, and Calumet – complement our federal and private sources. Furthermore, City staff continues to encourage all current and past subrecipients to be creative with using CDBG as a complementary funding source on a range community development projects.

1. Did the jurisdiction provide a description of how matching requirements of HUD's programs will be satisfied?

Page(s) :

Comments: *I did not find a response to this item.*

There are no matching requirements associated with the CDBG entitlement program.

Description of Activities

**If not using the CPMP Tool: Complete and submit Table 3C*

**If using the CPMP Tool: Complete and submit the Projects Worksheets and the Summaries Table.*

2. Does the action plan provide a summary of the eligible programs or activities that will take place during the program year to address the priority needs and specific objectives identified in the strategic plan?

(Use of the Summaries Table and Project Worksheets or Table 3C/2A will be sufficient. No additional narrative is required.)

Page(s) :

Comments: I did not find a response to this item.

The files Summaries.xls and Projects.xls are attached.

Summary of Specific Annual Objectives and Outcome Measures

**If not using the CPMP Tool: Complete and submit Table 2C and Table 3A.*

**If using the CPMP Tool: Complete and submit the Summary of Specific Annual Objectives Worksheets or Summaries.xls*

3. Did the jurisdiction provide a summary of specific objectives that will be addressed during the program year?
(91.220(c)(3))

(Use of the Summaries Table and Project Worksheets or Table 3C/2A will be sufficient. No additional narrative is required.)

Page(s) :

Comments: I did not find a response to this item.

The files Summaries.xls and Projects.xls are attached.

1. Did the jurisdiction describe the Federal Resources, and private and non-Federal public resources expected to be available to address priority needs and specific objectives during the program year?

(Use of the Summaries Table and Project Worksheets or Table 3C/2A will be sufficient. No additional narrative is required.)

Page(s) :

Comments: *The responses in this section seem to be somewhat out of order and I could not find a response to this item.*

The files Summaries.xls and Projects.xls are attached.

1. Did the jurisdiction describe the outcome measures for activities in accordance with Federal Register Notice dated March 7, 2006, i.e., general objective category (decent housing, suitable living environment, economic opportunity) and general outcome category (availability/accessibility, affordability, sustainability)? 91.220(e)
(Use of the Summaries Table or Table 2C/Table 3A will be sufficient. No additional narrative is required.)

Page(s) :

Comments: *I could not find a response to this item. PS This item does not just pertain to housing activities.*

The file Summaries.xls is attached.

Housing

1. Did the jurisdiction describe the one-year goals for the number of homeless, non-homeless, and special-needs households to be provided affordable housing using funds made available to the jurisdiction and one-year goals for the number of households to be provided affordable housing through activities that provide rental assistance, production of new units, rehabilitation of existing units, or acquisition of existing units using funds made available to the jurisdiction? The term affordable housing shall be defined in 24 CFR 92.252 for rental housing and 24 CFR 92.254 for homeownership.

Page(s) : 21; Table

Comments: These are exactly the same goals as last year. Just checking to see if they should be updated?

The goals are the same as last year. The Homeowner Rehabilitation Loan Program, Appleton Housing Authority, Housing Partnership of the Fox Cities and Habitat for Humanity received almost exactly the same award amounts for 2013 as they did in 2012.

Antipoverty Strategy

4. Did the jurisdiction briefly describe the actions that will take place during the next year to reduce the number of poverty level families? (as defined by the Office of Management and Budget and revised annually), taking into consideration factors over which the jurisdiction has control.

Page(s) : 25

Comments: The Plan does not describe the actions that will take place during the next year. The Plan states that "...CDBG funds can be used.." not that they will be used. The remainder of the response is more of a description of anti-poverty agencies rather than actions that will be taken in 2013.

The date of the final approval of 2013 allocations was very close to the deadline of the AAP, and this section should have been edited to outline what will happen this year.

CDBG funds in 2013 will support FISC, Emergency Shelter of the Fox Valley, Housing Partnership of the Fox Cities, and Harbor House. All these agencies, as outlined in the AAP on page 31, have roles in assisting individuals either rise above poverty level, or helping them stay above poverty level.

The City's Homeowner Rehabilitation Loan Program assists individuals whose homes have such serious code violations that eviction is imminent. The Inspections Department will continue to refer homeowners to the housing coordinator to discuss their options in correcting code violations and if they qualify for the loan, the City will grant the homeowner extra time to make repairs and bring their home back up to code standards. There have been occasions when an individual was able to stay in the home because of the loan program, when the only other option would have been great financial hardship and possible loss of the home. Since the housing market has been so slow to recover and job growth very minimal, we anticipate these cases to continue to occur periodically throughout this year.

The Appleton Housing Authority has a homebuyer program that assists qualified individuals move out of rental housing, which is sometimes an affordable housing situation, and purchase a home. This movement allows those searching for an affordable place to live the chance to gain stability in their lives and concentrate on improving their financial situation.

Barriers to Affordable Housing

5. Did the jurisdiction describe the actions that will take place during the next year to remove barriers to affordable housing?

Page(s) : 23-28

Comments: *Except for a few words, this is the same response that was provided in last year's Annual Plan. Are there updates to any of these actions? For example, last year's plan said that Phase II of the AI would be completed in 2012. If so, they should be reflected in the response. The response might be getting a little outdated (referring to a 2004 publication and the 2006 AI).*

The City contracted with the Metropolitan Milwaukee Fair Housing Council (MMFHC) to update the 2006 Analysis of Impediments to Fair Housings (AI). The first draft of the document was reviewed in September 2012, and as of March 2013, the discussion between City staff and MMFHC staff regarding this draft continues. A number of City staff that had never had exposure to the AI are a part of the review team, and as a result, have learned a great deal about fair housing issues and have increased awareness of what the City's role can be in promoting fair housing. The Legal Services department is reviewing the AI in regard to the fair housing ordinance. The outcome of that review has a very strong chance of spurring amendments to the ordinance in 2013. The City will continue to contract with an outside agency to provide fair housing services to the citizens of Appleton.

There have not been updates to either the East Central Planning or Appleton Housing Authority documents cited in the AAP.

Although the City's rental rehabilitation program is not currently funded, any program income will be used to rehabilitate and make available affordable housing to qualified individuals.

Funding the Housing Partnership of the Fox Cities and Appleton Housing Authority is the City's most important action in removing barriers to affordable housing. The Appleton Housing Authority has access to voucher programs and additional State and Federal funds that are used to place and keep people in homes they can afford.

1. Did the jurisdiction describe the actions that will take place during the next year to foster and maintain affordable housing?

Page(s) :

Comments: *I did not find a response to this item.*

From page 22:

CDBG-funded actions to be undertaken in 2013 that foster/maintain affordable housing include:

- *City of Appleton Homeowner Rehabilitation Loan Program = provide 24 low-moderate income homeowners with no-interest and no down payment loans to perform necessary rehabilitation, including control of lead hazards, at their single-family home or duplex.*
- *Appleton Housing Authority Homebuyer Program = provide 20 low-moderate income families purchasing their first home with down payment assistance and/or rehabilitation loans (including necessary lead testing) to bring their homes into compliance.*
- *The Housing Partnership of the Fox Cities = maintain 6 units that are rented to LMI families.*

Additional projects that will occur in 2013 include:

- *NSP funds will facilitate development of one new unit of affordable housing through Habitat for Humanity's program.*
- *Greater Fox Cities Area Habitat for Humanity will acquire land, demolish any existing structures and install necessary infrastructure on that land to facilitate construction of one green-built, single-family home for low-moderate income residents.*
- *Greater Fox Cities Area Habitat for Humanity was chosen as one of 55 affiliates throughout the U.S. to participate in Habitat for Humanity International's Neighborhood Revitalization Initiative, which encourages affiliates to serve more families and create more sustainable communities by offering a variety of services in addition to new home construction. The services provide critical home repairs, energy efficiency improvements and aesthetic enhancements to the owner-occupied homes of low-income families. The City's Neighborhood Services Program may partner with Habitat on this effort.*

Specific Homeless Prevention Elements

*Please also refer to the Homeless Needs Table in the Needs.xls workbook.

1. Did the jurisdiction describe, briefly, their plan for the investment and use of available resources and describe the specific planned action steps it will take over the next year aimed at eliminating chronic homelessness by 2013? Did they identify barriers to achieving this?

Comments: This response needs to more concisely describe the plan for use of resources and planned action steps. Too much space is spent describing agencies that serve the homeless. It might help if you try to use verbs to convey action steps.

1. The City awarded funds to the Emergency Shelter of the Fox Valley (ESFV) to improve the bathroom facilities that will be used by approximately 815 individuals. Keeping this facility in good repair is fundamental in supporting the programs offered by ESFV that focus on getting individuals the assistance they need, whether it is mental health counseling, financial education, or simply a place to sleep.
2. The City also awarded funds to Harbor House Domestic Abuse Program, which provides women with a safe place when leaving a dangerous situation. Having this place available gives women and children with no financial resources somewhere to go and may give them a chance to heal and make decisions about their future, instead of worrying about where they and their children will sleep that night.
3. The Finance department continues to administer the PSH/THP and ETH grants, which allows non-City entities to use their time for doing the work of aiding homeless individuals, instead of administrative work.
4. Much of the work toward ending chronic homelessness is initiated by outside entities receiving funds other than CDBG. The City participates as fiscal agent for those funds and participates on the Continuum of Care.
5. The City Council and Mayor are fully supportive of assisting with administration of programs in an effort to facilitate the end of chronic homelessness by 2013.

Non-homeless Special Needs (91.220 (c) and (e))

**If not using the CPMP Tool: Complete and submit Table 1B.*

**If using the CPMP Tool: Complete and submit Needs Table/Non-Homeless Needs.*

6. Did the jurisdiction describe any supportive housing activities being undertaken to address the priority housing needs of persons who are not homeless (elderly, frail elderly, persons with disabilities, persons with HIV/AIDS, persons with alcohol or other substance abuse problems)?

Page(s) :

Comments: The Plan indicates that in 2013, approximately \$13,000 was identified to address the needs of the non-homeless/special priority needs residents. (Do you know how these funds will be used?)

The Housing Partnership of the Fox Cities was awarded \$13,000 with which they intend to modify/rehabilitate six units rented to low-income individuals, a number of which house individuals with disabilities or individuals with children who have come from a situation involving domestic violence.

Community Development Block Grant

**If not using the CPMP Tool: Complete and submit Table 2B, Table 1C Summary of Specific Objectives.*

**If using the CPMP Tool: Complete and submit the Needs Worksheets/Non-Housing Community Development and Summary of Specific Annual Objectives Worksheets or Summaries.xls*

7. Did the jurisdiction identify the estimated amount of CDBG funds that will be used for activities that benefit persons of low- and moderate-income (an amount generally not to exceed ten percent of the total available CDBG funds may be excluded from the funds for which eligible activities are described if it has been identified as a contingency for cost overruns?)

Page(s) :

Comments: *I did not find a response to this item.*

The City has estimated its 2013 CDBG award will be \$430,000. Of this amount, approximately 90%, or \$387,000, will be used for activities that benefit persons of low- and moderate-income.

8. Does the plan describe all CDBG resources expected to be received during the program year, including the following, in addition to the annual grant:

a. Program income expected to be received during the program year, including:

i. The amount expected to be generated by and deposited to revolving loan funds?

Page(s) :

Comments: *I did not find a response to this item.*

The City of Appleton's Homeowner Rehabilitation Loan Program is the only activity that includes a revolving loan fund. The estimated amount expected to be generated by and deposited to this revolving loan fund is \$211,000.

ii. The total amount expected to be received during the current program year from a float-funded activity described in a prior statement or plan?

Page(s) :

Comments: *I did not find a response to this item.*

The City of Appleton will not receive income from a float-funded activity.

b. Program income received in the preceding program year that has not been included in a statement or plan?

Page(s) :

Comments: *I did not find a response to this item.*

The only program income received by the City in 2012 is included in the revolving loan fund for the Homeowner Rehabilitation Loan Program.

c. Proceeds from Section 108 loan guarantees that will be used during the year to address the priority needs and specific objectives in its strategic plan?

Page(s) :

Comments: *I did not find a response to this item.*

The City of Appleton does not receive proceeds from Section 108 loan guarantees.

d. Surplus funds from any urban renewal settlement for community development and housing activities? and

Page(s) :

Comments: *I did not find a response to this item.*

The City of Appleton will not receive funds from any urban renewal settlement.

- e. Any grant funds returned to the line of credit for which the planned use has not been included in a prior statement or plan?

Page(s) :

Comments: *I did not find a response to this item.*

No grant funds were returned to the line of credit for which a planned use has not been included in a prior statement or plan.

41. If a jurisdiction intends to carry out a new CDBG float-funded activity, does the plan include the following information:

- f. For the program income included in 1(b) above, the month(s) and year(s) in which the program income will be received; and which of the following options it will take for each float-funded activity to address the risk that the activity may fail to generate adequate program income:
 - i. amend or delete activities in the amount equal to any amount due from default or failure to produce sufficient income in a timely manner. (If this option is chosen, the action plan must include a description of the process it will use to select activities to be amended or deleted and how it will involve citizens in that process), OR
 - ii. obtain an irrevocable line of credit from a commercial lender for the full amount of the float-funded activity. (If this option is chosen, information on the float-funded activity in the action plan must include the lender and the terms of the irrevocable line of credit), OR
 - iii. agree to transfer general local government funds to the CDBG line of credit in the full amount of any default or shortfall within 30 days of the float-funded activity's failure to generate projected program income on schedule?

Page(s) :

Comments: *I did not find a response to this item.*

The City of Appleton will not carry out a new CDBG float-funded activity.

42. Did the jurisdiction identify its priority non-housing community development needs eligible for assistance by CDBG eligibility category specified in the Community Development Needs, public facilities, public improvements, public services and economic development? (Use of Table 2B or the Community Development Needs Table is sufficient, additional narrative is not required)

- a. For activity for which the jurisdiction has not yet decided on a specific location, such as when a jurisdiction is allocating an amount of funds to be used for making loans or grants to businesses or for residential rehabilitation, did they provide a description of who may apply for the assistance, the process by which they expect to select who will receive the assistance (including selection criteria), and how much and under what terms the assistance will be provided?

Page (s) :

Comments: *I did not find a response to this item.*

The files Needs.xls is attached.

The program which has been designated funding, but has not yet identified a specific location is the Neighborhood Services Program. This program is under construction and guidelines are drafted, and they include:

- 1. Who may apply: Registered neighborhoods in LMI census tracts*
- 2. Process by which dollars will be allocated: The neighborhood will complete a grant application explaining the project and its benefits.*
- 3. How much will be allocated to each project: There will be two types of grants available - one for \$500, one for up to \$5,000. Only one \$500 grant per neighborhood per year and one \$5,000 grant per neighborhood every five years will be allowed.*
- 4. Terms of agreement for Neighborhood Services funding: The neighborhood must be registered with the city and have an assigned leader. The leader must have participated in the city sponsored Neighborhood Academy. The grant application will be evaluated by Community and Economic Development Department staff to ensure the proposed activity will benefit all in the neighborhood and qualify for funding under CDBG regulations.*

42. An "urgent need" activity may be included in the action plan only if the jurisdiction certifies that the activity is designed to meet other community development needs having a particular urgency because existing conditions pose a serious and imminent threat to the health or welfare of the community and other financial resources are not available. Did the jurisdiction certify the need for an urgent need activity in the action plan?

Page(s) :

Comments: *I did not find a response to this item.*

The City of Appleton will not fund "urgent need" activities.