

FISCAL YEAR 2015-2016 ANNUAL ACTION PLAN

Community Development Block Grant (CDBG)

CDBG Regulations 24 CFR Part 570

HUD CDBG ALLOCATIONS

FIVE YEAR ENTITLEMENT SUMMARY (FY 2011-2015)

	2011	2012	2013	2014	2015*
CDBG	\$2,472,356	\$2,063,138	\$2,185,785	\$2,145,231	\$1,930,708
HOME	\$1,012,662	\$667,268	\$646,077	\$638,502	\$574,652
ESG	\$187,486	\$214,100	\$150,512	\$177,570	\$159,813
TOTAL	\$3,672,504	\$2,944,506	\$2,982,374	\$2,961,303	\$2,665,173

http://portal.hud.gov/hudportal/HUD?src=/program_offices/comm_planning/about/budget

* Estimated amount only

CDBG ENTITLEMENT GRANT PROGRAM OBJECTIVES

Primary objective: viable urban communities by providing decent housing, suitable living environment, and expanded economic opportunities, principally for persons of low and moderate income. Two **ways** to achieve this objective :

- Provide eligible activities CFR 570.201 to 570.206 Eligible Activities
- Meet one of the three national objectives CFR 570.208 Criteria for National Objectives)
 - benefit extremely low-, very low and low-income persons
 - prevent and eliminate slums or blight
 - meet community development needs having a particular urgency

FISCAL YEAR 2014 INCOME LIMIT SUMMARY FOR VENTURA COUNTY

Median Income \$88,700

Income Limit Category	1 Person	2 Person	3 Person	4 Person	5 Person	6 Person	7 Person	8 Person
Extremely Low Income (30%)	\$18,650	\$21,300	\$23,950	\$26,600	\$28,750	\$31,970	\$36,030	\$40,090
Very Low Income (50%)	\$31,050	\$35,500	\$39,950	\$44,350	\$47,900	\$51,450	\$55,000	\$58,550
Low Income (80%)	\$48,300	\$55,200	\$62,100	\$68,950	\$74,000	\$80,000	\$85,500	\$91,050

Source: US Department of Housing and Urban Development
Income Limit areas are based on FY 2014 Fair Market Rent (FMR) areas

CDBG ENTITLEMENT GRANT PROGRAM PARTNERS

CDBG key partners:

1. CDBG Grantee
2. Subrecipient
3. Community-Based Development Organization (CBDO)
4. Contractor
5. Unit of General Local Government

ELIGIBLE CDBG ACTIVITIES

In general, any activity that is not specifically authorized under the CDBG regulations and statute is **ineligible**.

- 24 CFR 570.201 to 570.206 lists CDBG eligible activities ([Attachment #1](#))
- 24 CFR 570.207 discusses about the ineligible activities ([Attachment #2](#))

CDBG funds can be used for:

- Affordable Housing
- Other Real Properties
- Public Facilities and Improvements
- Public Services
- Economic Development
- Revitalization Areas (NRSA)
- Other Eligible Activities

CDBG NATIONAL OBJECTIVES

Benefit principally low and moderate income (LMI) persons.

- LMI Area benefit (LMA):
 - Boundaries of the service area must be primarily residential. The activity should benefit all the residents in the particular area,
 - Commonly used category for community-wide activities
 - Examples: street improvements, neighborhood facilities, water and sewer lines, and façade improvements in a commercial district that serves a LMI neighborhood
- Limited Clientele (LMC):
 - Documentation on household size and income of each person receiving the benefit, in order to show that at least 51% of the clientele are LMI, or
 - Documentation that facility/service designed for or used exclusively by one of the eligible “presumptive” groups, or
 - Documentation of nature and location of the facility/service such that it can be concluded that the activity’s clientele will primarily be LMI persons, or
- LMI Housing (LMH)
 - Provide or improve permanent residential structures, that upon completion, will be occupied by LMI households.
 - For structures with 2 or more units, LMI households must occupy at least 51% of the units
- LMI Job (LMJ)
 - Written agreement with required provisions
 - Listing of job title of permanent job filled (available to LMI)
 - Evidence of job lost without CDBG
 - Listing of job title of permanent jobs retained, including part-time

CDBG - NATIONAL OBJECTIVES CONT'D

Aid in the prevention and elimination of slums or blight:

- Area Slum/Blight:
 - Boundaries of the area meeting the definition of slum/blight under the local law – NONE in City of Oxnard;
- Spot Slum/ Blight:
 - NONE in City of Oxnard;
- Urban Renewal area:
 - Activities located within an Urban Renewal project area or Neighborhood Development Program action area that are necessary to complete an Urban Renewal Plan,
 - Documentation of the Urban Renewal Plan including maps and supporting documentation must be maintained at the time the CDBG activity is carried on.

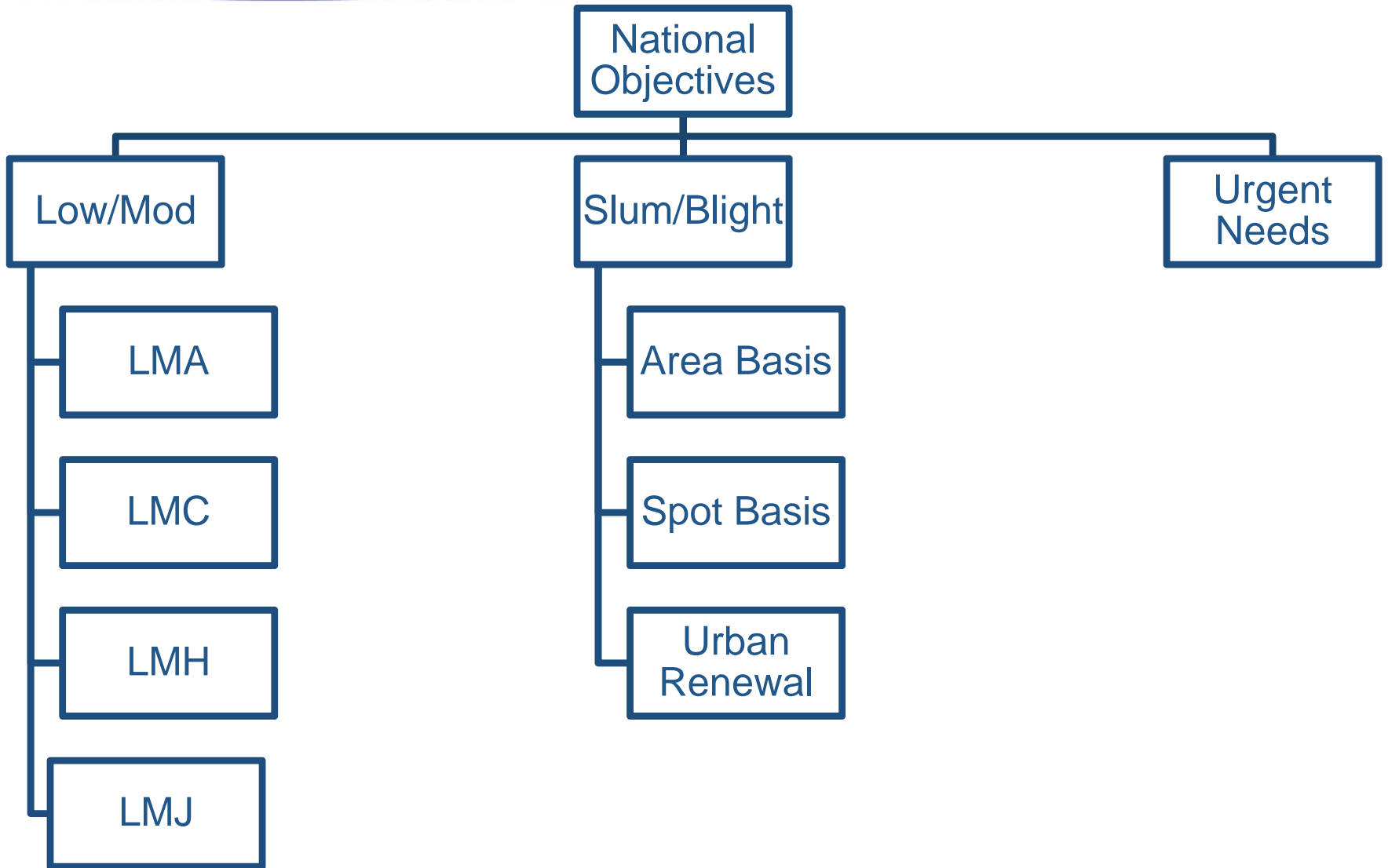
Meet a need with a particular urgency and must satisfy the following qualifying criteria:

- Existing conditions must pose a serious and immediate threat to the health or welfare of the community; and
- Existing conditions must be of recent origins, or must recently become urgent (last 18 months); and
- Grantee is unable to finance the activity on its own; and
- Other sources of funding are not available.

For more information:

See “Guide to National Objectives and Eligible Activities for Entitlement Communities”

CDBG - NATIONAL OBJECTIVES CONT'D



Three categories of CDBG

Administration

- Program Administration: overall program management, coordination, monitoring, reporting and evaluation
- Other eligible activities: fair housing activities, indirect costs, citizen participation costs
- Limited to 20% of Current Year Allocation and Current Year Program Income Funds

Public Services

- Limited to 15% of Current Year Allocation and Prior Year Program Income Funds
- Must be a new service or a quantifiable increase in the level of a service
- Examples: child care, health care, job training, recreation programs, educational programs, public safety services, fair housing activities, services for homeless and for senior citizens, drug abuse counseling and treatment, energy conservation and testing, homebuyer downpayment assistance and welfare (but excluding provisions of income payments)

Capital Improvements Projects (CIP) or Direct Benefits Projects

- Housing Activities: housing services, housing rehabilitation, lead-based paint testing and abatement, and homeownership assistance
- Public Facilities and Improvements: infrastructure, community facilities, special needs and public facilities
- Other Real Property Activities such as Code Enforcement, acquisition, disposition
- Economic Development: Business Technical Assistance, micro-enterprise assistance, commercial rehabilitation

CDBG ENTITLEMENT GRANT COMPLIANCE REQUIREMENTS

- **Environmental review** must be completed by the grantee for all project activities prior to obligating CDBG funds. No HUD money may be used to fund projects that cannot receive National Environmental Protection Act (NEPA) clearance. This report must be completed for every CDBG funded activity to show that there is no impact on the environment or, if there is, that there is no negative impact on the environment. (24 CFR Part 58)
- Under certain conditions, the grantee and its subrecipients may incur costs prior to the effective date of the grant agreement with HUD. **Pre-award costs** should not exceed 25% of grant amount or \$300,000, whichever is greater.

PERFORMANCE MEASUREMENT

Three components of the measurement system are:

1. Objectives (3):

- Creating Suitable Living Environments
- Providing Decent Housing
- Creating Economics Opportunities

2. Outcomes (3):

- **Availability/Accessibility** - *activities that make services, infrastructure, public services, public facilities, housing, or shelter available or accessible to LMI people, including persons with disabilities.*
- **Affordability** - *activities that provide affordability in a variety of ways to LMI people. It can include the creation or maintenance of affordable housing, basic infrastructure hook-ups, or services such as transportation or day care.*
- **Sustainability** - *activities that are aimed at improving communities or neighborhoods, helping to make them livable or viable by providing benefit to LMI persons or by removing or eliminating slums or blighted areas, through multiple activities or services that sustain communities or neighborhoods.*

PERFORMANCE MEASUREMENT CONT'D

3. Indicators (4):

- Amount of leverage from other Federal, state, local and private sources per activity,
- Number of persons, households, businesses, units or beds assisted, as appropriate,
- Income levels of persons or households: extremely low- (30% of AMI), very low (50% of AMI) and low-income (80% of AMI). For CDBG LMC activities, the data reported will need to show the total number of persons served and the number of LMI individuals served.
- Race, ethnicity, and disability data: under CDBG, race/ethnicity data is required only when the undertaken activity benefits directly persons or households such as job creation, housing rehabilitation. This indicator data is not required for activities under CDBG LMA, slum/blight, or urgent need national objectives.

Race: white, Black/African American, Asian, American Indian/Alaskan Native, Native Hawaiian/Other Pacific Islander, American Indian/Alaskan Native & White, Asian White, Black/African American & white, American Indian/Alaskan Native & Black/African, Other multi-racial, Asian/Pacific Islander

Ethnicity: Hispanic

CITIZEN PARTICIPATION PLAN

The Oxnard Citizens Participation Plan , originally adopted by the City Council on October 18, 1994, and modified on July 25, 2000, consists of:

- Public Outreach and Access
- Public Hearings
- Technical Assistance
- Comments and complaints
- Amendments

24 CFR 91.200(c) and 91.215 (I)

CONSOLIDATED PLAN AND ANNUAL ACTION PLANS

Consolidated Plan

- Prepared by the grantee in accordance with 24 CFR Part 91
- Describes needs, resources, priorities and proposed activities to be undertaken with respect to HUD's CPD formula programs (CDBG, HOME, HESG and HOPWA).
- June 2013 the City Council approved 2013-2018 Consolidated Plan
- Information related to the preparation for the 3rd year of the Annual Action Plan (FY 2015-16) at <http://housing.cityofoxnard.org/10/91>

FUNDING PRIORITIES

Need	Priority	Population target	Goals
Housing	High	extremely low & low income households	<ul style="list-style-type: none"> • assisting the first-time homebuyers in homeownership • creating new affordable rental housing units • housing preservation • maintaining a safe and healthy living environment through code enforcement
Homelessness	High	homeless families w/ children, chronically homeless individuals, veterans, victims of domestic violence	<ul style="list-style-type: none"> • reducing homelessness by providing <ul style="list-style-type: none"> • housing, supportive services • financial assistance • job training and placement • shelter services

FUNDING PRIORITIES CONT'D

Need	Priority	Population target	Goals
Non-Housing Community Development	High	targeting transitional age youth, and low-income at-risk youth	<ul style="list-style-type: none"> providing job training and placement, supportive services, and recreational services.
Public Facilities and Improvements	High	low- and moderated income areas	<ul style="list-style-type: none"> Improve public facilities and improvements
Non-Homeless Special Needs	High	the elderly, persons suffering from a mental illness, the disabled and persons with substance abuse issues	<ul style="list-style-type: none"> providing housing and supportive services

The estimated amount for the program year 2015 is **\$1,930,708**.

1. Administration maximum amount \$386,142
2. Public Services maximum amount \$289,606.
3. Capital Item Projects / direct benefits projects balance \$1,254,960.

Adjustments will be done when we will receive PY 2015 HUD allocation.

Important Dates:

- 1/13/15 - First Public Hearing – Assessment of unmet needs
- 2/23/15 – Applications due
- 3/2/15-3/6/15 – Review panel presentations & evaluations
- 04/07/15 – 2nd Public Hearing for recommendations of uses of funds for Council approval of FY 2015-16 AAP
- 05/15/15 - Submit FY 2015-16 Plan to HUD

REPORTING REQUIREMENTS

- Labor Laws and Requirements: HUD-4710 Form - Semi-annual Labor Standards Enforcement Report
- Minority Business: HUD-2516 Form – Annual Minority Business Enterprise contract and Subcontract Activity
- Section 3: HUD-60002 – Annual Section 3 Hiring and Contracting Summary Report
- Federal Financial Report - SF-425 and SF-425A sent to HUD on a quarterly basis
- Quarterly performance updating in IDIS for CDBG activities
- Annual Performance Report or Grantee Performance Report
- Consolidated Annual Performance and Evaluation Report (CAPER)

Annual Reports are used to meet 3 basic purposes:

- Provide HUD with necessary information to assess each grantee's ability to carry out its programs in compliance with applicable regulations and requirements,
- Provide information necessary for HUD to report to Congress, and
- Provide grantees with an opportunity to describe its program achievements with their citizens.

CONSOLIDATED ANNUAL PERFORMANCE AND EVALUATION REPORT (CAPER)

CAPER

- Annual report to HUD
- Due within 90 days of the end of the fiscal year
- summarizes the City's performance for the fiscal year
- includes a description of the resources made available, investment of available resources, geographic distribution and location of investments, families and persons assisted (including the racial and ethnic status of persons assisted), and other actions indicated in the Con Plan and the Action Plan.

INTEGRATED DISBURSEMENT AND INFORMATION SYSTEM (IDIS)

IDIS is the online system used to:

1. Track the projects/activities and draw down funds and program income,
2. Record the results of grant funded activities, and
3. Submit electronically the ConPlan, AAP and CAPER to HUD.

HUD uses the data provide by all grantees in IDIS to report on the performance of the grant programs to Congress and other program stakeholders.

MONITORING

Monitoring: systematic plan of managing CDBG for timeliness, adherence to primary objective, funding criteria for each activity, etc.

Types of review/monitoring:

- Desk review: administrative and financial monitoring
- Field Monitoring: project monitoring
- HUD Monitoring: program performance monitoring
- Corrective Action and Training and Technical Assistance

OTHER FEDERAL REQUIREMENTS

- Labor Standards Requirements: 29 CFR Parts 1, 3, 5, 6 and 7
- Section 3
- Procurement 24 CFR 570.502, 570.610 and 85.36
- Environmental Review 24 CFR Part 58
- Lead Safe Housing Rule: 24 CFR Part 35, 570.608
- Uniform Relocation Act: 24 CFR Part 42, 49 CFR Part 24 and HUD Handbook 1378
- Fair Housing and Equal Opportunity Laws: Section 109 and 570.602.
www.hud.gov/offices/fheo/index.cfm
- Desk procedure
- Program policies and procedures

APPLICATION PROCESS

- 01/20/15 - Application workshops
 - Overview of Entitlement grants (CDBG, HOME and ESG)
- **02/23/15 – Due date for Application Package**
- 03/02/15-03/06/15 – Review panel ranks applications (estimated)

APPLICATION PROCESS

- Technical assistance available to applicants
- Upon submission of the applications:
 - Reviewed for completeness and eligibility by Grants Division
 - Review panel convened to evaluate eligible submissions
 - Seven (7) member review panel will be made up of delegates from four citizen advisory groups and three members of City staff

APPLICATION PROCESS

- Panel will rank the applications based upon pre-established criteria including:
 - experience in providing the services,
 - experience in the CDBG/HOME/ESG programs,
 - consistency with priorities and objectives established in the ConPlan,
 - experience in the community,
 - administrative and financial capacity to carry out the proposed activity, etc.
- Panel's recommendations provided to staff for formal recommendation to the City Council at the April 7, 2015 Public Hearing

General Information

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QUESTIONS?

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