# **Executive Summary**

## AP-05 Executive Summary - 24 CFR 91.200(c), 91.220(b)

#### 1. Introduction

The Consolidated Plan and Annual Action Plan processes are designed to help local jurisdictions assess their affordable housing and community development needs and market conditions, and to make data-driven, place-based investment decisions. The consolidated planning process serves as the framework for a community-wide dialogue to identify housing and community development priorities that align and focus funding from the block grant programs.

The 2022 Annual Action Plan represents Year Three of the 2020-2024 five-year Consolidated Plan. This Plan indicates the FY2022 priority needs and related objectives to support strong neighborhoods, a healthy economy, and needed public services. The priority needs and objectives outlined under the Plan follow these categories: Program Administration, Housing Rehabilitation, New Housing Construction, Public Services, Public Infrastructure, Code Enforcement, and Economic Development. The Consolidated Plan provides additional detail on the proposed funding allocation for the 2020 – 2024 period, the rationale behind the proposed allocation, and the outcomes expected from the funding.

The Greater Uptown Neighborhood Revitalization Strategy Area (NRSA) will remain active throughout the 2020 - 2024 Consolidated Plan.

The City of Racine anticipates receiving \$1,864,293 in Community Development Block Grant, \$704,930 in HOME, and \$160,046 in Emergency Solutions Grant in 2022.

## 2. Summarize the objectives and outcomes identified in the Plan

This could be a restatement of items or a table listed elsewhere in the plan or a reference to another location. It may also contain any essential items from the housing and homeless needs assessment, the housing market analysis or the strategic plan.

Based on the planning process's public involvement phase, several priorities were proposed for the community development program. The priorities were then translated into proposed allocations of funds. An initial percentage allocation was based on public involvement and interest in the funding category, as well as the specific needs of the City of Racine as detailed in the demographic/housing data reviewed by the staff of the City of Racine Neighborhood Services Division (NSD), which administers this funding.

Allocations of 2022 CDBG, HOME, and ESG funding were based on the public participation process and passing of the 2022 AAP by the City of Racine Common Council on July 18, 2022. If the grants are reduced, the dollar amounts allocated would be smaller but the percentages would be maintained.

### 3. Evaluation of past performance

This is an evaluation of past performance that helped lead the grantee to choose its goals or projects.

Based on 2015-2019 Consolidated Plan goals, our long-term comprehensive and consolidated plan process, current HUD data and census data, citizen surveys, consultations with partners and internal program assessments, the City of Racine created goals in the 2020-2024 5-Year Consolidated Plan to address housing and non-housing community development needs.

In 2021 the City generally met its annual performance goals. Due to Covid-19 many projects were slowed down. The City of Racine also amended its 2015-2019 Consolidated Plan to accept the CV funds issued by HUD.

#### 4. Summary of Citizen Participation Process and consultation process

Summary from citizen participation section of plan.

On May 30, 2022, a Public Notice was published in The Journal Times in Racine, Wisconsin, announcing the City of Racine's intent to submit the 2022 Annual Action Plan on or about July 20, 2022.

Public hearings were held on June 15, 2022, and July 11, 2022, both were held in person.

The 2022 Annual Action Plan was recommended for approval by the CDBG Advisory Board on July 11, 2022, and passed by the Common Council on July 18, 2022, via Resolution 0512-22

## 5. Summary of public comments

This could be a brief narrative summary or reference an attached document from the Citizen Participation section of the Con Plan.

A written comment was received on June 30, 2022, from Legal Action of Wisconsin, they supported allocating the full 15% of funds for the Public Service Category.

## 6. Summary of comments or views not accepted and the reasons for not accepting them

No comments were rejected for the FY 2021=2 Annual Action Plan.

# 7. Summary

No comments were rejected. Staff write the public commenter and stated comments would be placed in the 2022 AAP.

# PR-05 Lead & Responsible Agencies – 91.200(b)

## 1. Agency/entity responsible for preparing/administering the Consolidated Plan

Describe the agency/entity responsible for preparing the Consolidated Plan and those responsible for administration of each grant program and funding source.

Agency Role	Name	Department/Agency
CDBG Administrator	RACINE	Division of Neighborhood Services
HOME Administrator	RACINE	Division of Neighborhood Services
ESG Administrator	RACINE	Division of Neighborhood Services

Table 1 – Responsible Agencies

## **Narrative (optional)**

#### **Consolidated Plan Public Contact Information**

City Hall, Room 304: Division of Neighborhood Services

730 Washington Ave.

Racine, WI 53403

## AP-10 Consultation - 91.100, 91.200(b), 91.215(l)

#### 1. Introduction

In consultation with community leaders, municipal government representatives and local advocates of community development, housing and homeless issues, the City of Racine developed an outline of priority needs and specific goals and objectives for related programming from 2020-2024. In an effort to increase public involvement in the development of the 2020-2024 Five-Year Consolidated Plan, the City of Racine Division of Neighborhood Services held public input sessions, conducted focus groups with stakeholders and practitioners involved with activities eligible for CDBG, HOME, and ESG funding, and conducted Internet surveys of community members and stakeholders.

Provide a concise summary of the jurisdiction's activities to enhance coordination between public and assisted housing providers and private and governmental health, mental health and service agencies (91.215(I))

The City of Racine invited current and past program recipients, regional stakeholders, and practitioners to participate in the consultation process for the 2020-2024 Consolidated Plan. On October 14, 17, 18, 23, and 29, 2019 department staff conducted public input sessions to solicit insight for the development of the 2020-2024 Consolidated Plan from the general public, regional stakeholders, and past funding recipients. City staff also met with individual agency leadership. Participants from the focus groups and targeted agencies provided input on the strengths and shortcomings of the Racine community development programs over the past five years (2014-2019), and anticipated community development needs over the next five years (2020-2024). Participants were asked to identify replicable community development models from other regions, compare these programs, policies, or efforts to those currently available in Racine, and help determine what criteria or measures of success would accurately judge the success of Racine's overall community development programs in 2024.

An online survey was made available to the general public and all stakeholders to measure the impact of programs funded by CDBG, HOME, and ESG over the past five years, on the housing and community development needs of low- and moderate-income persons/households over the next five years, and on the priorities in the use of CDBG, HOME and ESG funds to meet those needs over the next five years. The survey was promoted through direct email and social media. Paper copies of the survey were distributed at community events and entered manually into the online format.

Describe coordination with the Continuum of Care and efforts to address the needs of homeless persons (particularly chronically homeless individuals and families, families with children, veterans, and unaccompanied youth) and persons at risk of homelessness.

The Department of City Development maintains a close working relationship with the Racine County Continuum of Care. Staff from the Department regularly attend COC meetings and are participants on

committees and working groups and the City is a member of the COC. In addition, the City has designated homeless assistance as one of its priorities and works with the COC and its members to provide funding for the highest-rated needs identified by homeless providers.

Describe consultation with the Continuum(s) of Care that serves the jurisdiction's area in determining how to allocate ESG funds, develop performance standards for and evaluate outcomes of projects and activities assisted by ESG funds, and develop funding, policies and procedures for the operation and administration of HMIS

A major emphasis of the City of Racine is directed at continuing partnerships and collaboration among local organizations that provide similar or complementary services; this is explained during the City annual orientation session prior to soliciting CDBG, HOME, and ESG applications. For the 2014-2019 ESG applications, the Racine Homeless Assistance Coalition applied jointly to both highlight their collaboration and to show the needs of the individual organizations based on the Coalition's combined goals; these organizations worked together when creating their applications and leveraged the funding requests based on what they applied for and obtained from other sources. The City of Racine anticipates this collective budgeting approach to continue for the 2020-2024 Consolidated Plan period.

The Racine CoC continues to be the organization responsible for developing the annual Continuum of Care application as well as a joint recommendation for the City's annual Emergency Solutions Grant funding allocation. The CoC has also taken the lead on developing the ESG written and performance standards, which are attached to this plan.

2. Describe Agencies, groups, organizations and others who participated in the process and describe the jurisdiction's consultations with housing, social service agencies and other entities

Table 2 – Agencies, groups, organizations who participated

Agency/Group/Organization	City of Racine/Public Works
Agency/Group/Organization Type	Other government - Local
	Grantee Department
	Major Employer
What section of the Plan was addressed by	Housing Need Assessment
Consultation?	Public Housing Needs
	Homeless Needs - Chronically homeless
	Homeless Needs - Families with children
	Homelessness Needs - Veterans
	Homelessness Needs - Unaccompanied youth
	Homelessness Strategy
	Market Analysis
	Economic Development
	Anti-poverty Strategy

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	general public and all stakeholders to measure the impact of programs funded
	with CDBG, HOME and ESG over the past five years, on the housing and
	community development needs of low- and moderate-income
	persons/households over the next five years, and on the priorities in the use of
	CDBG, HOME and ESG funds to meet those needs over the next five years. The
	survey was promoted through direct email and social media. Paper copies of the
	survey were distributed at community events and entered manually by staff int
	the on-line format.
Agency/Group/Organization	City of Racine/Administrator
Agency/Group/Organization Type	Other government - Local
	Grantee Department

What section of the Plan was addressed by	Housing Need Assessment
Consultation?	Public Housing Needs
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Agency/Group/Organization	RACINE COUNTY

Agency/Group/Organization Type	Services - Housing
	Services-Children
	Services-homeless
	Services-Health
	Services-Education
	Services-Employment
	Agency - Managing Flood Prone Areas
	Agency - Management of Public Land or Water Resources
	Agency - Emergency Management
	Publicly Funded Institution/System of Care
	Other government - County
	Regional organization
	Planning organization
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Consultation?	Public Housing Needs
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Agency/Group/Organization	HOUSING RESOURCES INC.
Agency/Group/Organization Type	Housing
	Services - Housing

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Agency/Group/Organization Type	Services-Elderly Persons
	Services-Persons with Disabilities
	Services-Victims of Domestic Violence
	Services-Employment
	Service-Fair Housing
	Services - Victims
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Consultation?	Public Housing Needs
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Agency/Group/Organization Type	Services - Housing
	Services-Persons with HIV/AIDS
	Services-Health
	Services-Education
	Services - Victims
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Consultation?	Public Housing Needs
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Agency/Group/Organization	Racine Habitat for Humanity
Agency/Group/Organization Type	Housing
	Services - Housing

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Agency/Group/Organization	Ascension Wisconsin

Agency/Group/Organization Type	Services-Health
	Health Agency
	Regional organization
	Business and Civic Leaders
	Major Employer
What section of the Plan was addressed by	Homeless Needs - Chronically homeless
Consultation?	Homeless Needs - Families with children
	Homelessness Needs - Veterans
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Agency/Group/Organization	Racine Kenosha Community Action Agency
Agency/Group/Organization Type	Housing

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Consultation?	Public Housing Needs
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Agency/Group/Organization	RACINE NEIGHBORHOOD WATCH, INC.

Agency/Group/Organization Type	Services - Housing
Agency, Group, Organization Type	Services-Children
	Services-Elderly Persons
	Services-Persons with Disabilities
	Neighborhood Organization
What section of the Plan was addressed by	Housing Need Assessment
Consultation?	Public Housing Needs
	Homeless Needs - Chronically homeless
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Agency/Group/Organization	Racine Unified School District
Agency/Group/Organization Type	Services-Education
	Other government - Local
	Grantee Department

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	currently available in Racine, and help determine what criteria or measures of
	success would accurately judge the success of Racine's overall community
	development programs in 2024.An on-line survey was made available to the
	general public and all stakeholders to measure the impact of programs funded
	with CDBG, HOME and ESG over the past five years, on the housing and
	community development needs of low- and moderate-income
	persons/households over the next five years, and on the priorities in the use of
	CDBG, HOME and ESG funds to meet those needs over the next five years. The
	survey was promoted through direct email and social media. Paper copies of the
	survey were distributed at community events and entered manually by staff int
	the on-line format.
Agency/Group/Organization	Great Lakes Community Conservation Corps
Agency/Group/Organization Type	Services-Education
	Services-Employment

# What section of the Plan was addressed by Consultation?

Non-Homeless Special Needs Economic Development Anti-poverty Strategy

Briefly describe how the

Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?

The City of Racine invited current and past program recipients, regional stakeholders, and practitioners to participate in the consultation process for the 2020-2024 Consolidated Plan. On October 14, 17, 18, 23 and 29, 2019 department staff conducted public input sessions to solicit insight for the development of the 2020-2024 Consolidated Plan from the general public, regional stakeholders, and past funding recipients. City staff also met with individual agency leadership. Participants from the focus groups and targeted agencies provided input on the strengths and shortcomings of Racine community development programs over the past five years (2014-2019), and anticipated community development needs over the next five years (2020-2024). Participants were asked to identify replicable community development models from other regions, compare these programs, policies or efforts to those currently available in Racine, and help determine what criteria or measures of success would accurately judge the success of Racine's overall community development programs in 2024. An on-line survey was made available to the general public and all stakeholders to measure the impact of programs funded with CDBG, HOME and ESG over the past five years, on the housing and community development needs of low- and moderate-income persons/households over the next five years, and on the priorities in the use of CDBG, HOME and ESG funds to meet those needs over the next five years. The survey was promoted through direct email and social media. Paper copies of the survey were distributed at community events and entered manually by staff into the on-line format.

13	Agency/Group/Organization	HADC - First Choice Apprenticeship
	Agency/Group/Organization Type	Services-Employment
		Business Leaders
	What section of the Plan was addressed by	Non-Homeless Special Needs
	Consultation?	Anti-poverty Strategy
	Briefly describe how the	The City of Racine invited current and past program recipients, regional
	Agency/Group/Organization was consulted. What	stakeholders, and practitioners to participate in the consultation process for the
	are the anticipated outcomes of the consultation or	2020-2024 Consolidated Plan. On October 14, 17, 18, 23 and 29, 2019
	areas for improved coordination?	department staff conducted public input sessions to solicit insight for the
		development of the 2020-2024 Consolidated Plan from the general public,
		regional stakeholders, and past funding recipients. City staff also met with
		individual agency leadership. Participants from the focus groups and targeted
		agencies provided input on the strengths and shortcomings of Racine community
		development programs over the past five years (2014-2019), and anticipated
		community development needs over the next five years (2020-2024).
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		from other regions, compare these programs, policies or efforts to those
		currently available in Racine, and help determine what criteria or measures of
		success would accurately judge the success of Racine's overall community
		development programs in 2024.An on-line survey was made available to the
		general public and all stakeholders to measure the impact of programs funded
		with CDBG, HOME and ESG over the past five years, on the housing and
		community development needs of low- and moderate-income
		persons/households over the next five years, and on the priorities in the use of
		CDBG, HOME and ESG funds to meet those needs over the next five years. The
		survey was promoted through direct email and social media. Paper copies of the
		survey were distributed at community events and entered manually by staff into
		the on-line format.

14	Agency/Group/Organization	HALO
	Agency/Group/Organization Type	Housing Services-homeless
	What section of the Plan was addressed by	Homeless Needs - Chronically homeless
	Consultation?	Homeless Needs - Families with children
		Homelessness Needs - Veterans
		Homelessness Needs - Unaccompanied youth
		Homelessness Strategy

Briefly describe how the	The City of Pacine invited current and pact program recipients, regional
	The City of Racine invited current and past program recipients, regional
Agency/Group/Organization was consulted. What	stakeholders, and practitioners to participate in the consultation process for the
are the anticipated outcomes of the consultation or	2020-2024 Consolidated Plan. On October 14, 17, 18, 23 and 29, 2019
areas for improved coordination?	department staff conducted public input sessions to solicit insight for the
	development of the 2020-2024 Consolidated Plan from the general public,
	regional stakeholders, and past funding recipients. City staff also met with
	individual agency leadership. Participants from the focus groups and targeted
	agencies provided input on the strengths and shortcomings of Racine community
	development programs over the past five years (2014-2019), and anticipated
	community development needs over the next five years (2020-2024).
	Participants were asked to identify replicable community development models
	from other regions, compare these programs, policies or efforts to those
	currently available in Racine, and help determine what criteria or measures of
	success would accurately judge the success of Racine's overall community
	development programs in 2024.An on-line survey was made available to the
	general public and all stakeholders to measure the impact of programs funded
	with CDBG, HOME and ESG over the past five years, on the housing and
	community development needs of low- and moderate-income
	persons/households over the next five years, and on the priorities in the use of
	CDBG, HOME and ESG funds to meet those needs over the next five years. The
	survey was promoted through direct email and social media. Paper copies of the
	survey were distributed at community events and entered manually by staff into
	the on-line format.
	the on-line format.
Agency/Group/Organization	UNITED WAY OF RACINE

Agency/Group/Organization Type	Services - Housing
	Services-Elderly Persons
	Services-Persons with Disabilities
	Services-Persons with HIV/AIDS
	Services-Victims of Domestic Violence
	Services-homeless
	Regional organization
	Business Leaders
	Civic Leaders
	Foundation
What section of the Plan was addressed by	Housing Need Assessment
Consultation?	Public Housing Needs
	Homeless Needs - Chronically homeless
	Homeless Needs - Families with children
	Homelessness Needs - Veterans
	Homelessness Needs - Unaccompanied youth
	Homelessness Strategy
	Non-Homeless Special Needs
	Market Analysis
	Market Analysis Economic Development

Briefly describe how the	The City of Racine invited current and past program recipients, regional
Agency/Group/Organization was consulted. What	stakeholders, and practitioners to participate in the consultation process for the
are the anticipated outcomes of the consultation or	2020-2024 Consolidated Plan. On October 14, 17, 18, 23 and 29, 2019
areas for improved coordination?	department staff conducted public input sessions to solicit insight for the
	development of the 2020-2024 Consolidated Plan from the general public,
	regional stakeholders, and past funding recipients. City staff also met with
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	agencies provided input on the strengths and shortcomings of Racine community
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	community development needs over the next five years (2020-2024).
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	from other regions, compare these programs, policies or efforts to those
	currently available in Racine, and help determine what criteria or measures of
	success would accurately judge the success of Racine's overall community
	development programs in 2024.An on-line survey was made available to the
	general public and all stakeholders to measure the impact of programs funded
	with CDBG, HOME and ESG over the past five years, on the housing and
	community development needs of low- and moderate-income
	persons/households over the next five years, and on the priorities in the use of
	CDBG, HOME and ESG funds to meet those needs over the next five years. The
	survey was promoted through direct email and social media. Paper copies of the
	survey were distributed at community events and entered manually by staff into
	the on-line format.
16 Agency/Group/Organization	Uptown Business Improvement District
Agency/Group/Organization Type	Business Leaders

What section of the Plan was addressed by	Housing Need Assessment
Consultation?	Public Housing Needs
	Homeless Needs - Chronically homeless
	Homeless Needs - Families with children
	Homelessness Needs - Veterans
	Homelessness Needs - Unaccompanied youth
	Homelessness Strategy
	Market Analysis
	Economic Development
	Anti-poverty Strategy

Briefly describe how the	The City of Racine invited current and past program recipients, regional
Agency/Group/Organization was consulted. What	stakeholders, and practitioners to participate in the consultation process for the
are the anticipated outcomes of the consultation or	2020-2024 Consolidated Plan. On October 14, 17, 18, 23 and 29, 2019
areas for improved coordination?	department staff conducted public input sessions to solicit insight for the
	development of the 2020-2024 Consolidated Plan from the general public,
	regional stakeholders, and past funding recipients. City staff also met with
	individual agency leadership. Participants from the focus groups and targeted
	agencies provided input on the strengths and shortcomings of Racine community
	development programs over the past five years (2014-2019), and anticipated
	community development needs over the next five years (2020-2024).
	Participants were asked to identify replicable community development models
	from other regions, compare these programs, policies or efforts to those
	currently available in Racine, and help determine what criteria or measures of
	success would accurately judge the success of Racine's overall community
	development programs in 2024.An on-line survey was made available to the
	general public and all stakeholders to measure the impact of programs funded
	with CDBG, HOME and ESG over the past five years, on the housing and
	community development needs of low- and moderate-income
	persons/households over the next five years, and on the priorities in the use of
	CDBG, HOME and ESG funds to meet those needs over the next five years. The
	survey was promoted through direct email and social media. Paper copies of the
	survey were distributed at community events and entered manually by staff into
	the on-line format.
Agency/Group/Organization	RACINE/KENOSHA URBAN LEAGUE
Agency/Group/Organization Type	Planning organization
	Business and Civic Leaders

What section of the Plan was addressed by	Housing Need Assessment
Consultation?	Public Housing Needs
	Homeless Needs - Chronically homeless
	Homeless Needs - Families with children
	Homelessness Needs - Veterans
	Homelessness Needs - Unaccompanied youth
	Homelessness Strategy
	Non-Homeless Special Needs
	Market Analysis
	Economic Development
	Anti-poverty Strategy

Briefly describe how the	The City of Racine invited current and past program recipients, regional
Agency/Group/Organization was consulted. What	stakeholders, and practitioners to participate in the consultation process for the
are the anticipated outcomes of the consultation or	2020-2024 Consolidated Plan. On October 14, 17, 18, 23 and 29, 2019
areas for improved coordination?	department staff conducted public input sessions to solicit insight for the
	development of the 2020-2024 Consolidated Plan from the general public,
	regional stakeholders, and past funding recipients. City staff also met with
	individual agency leadership. Participants from the focus groups and targeted
	agencies provided input on the strengths and shortcomings of Racine community
	development programs over the past five years (2014-2019), and anticipated
	community development needs over the next five years (2020-2024).
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	from other regions, compare these programs, policies or efforts to those
	currently available in Racine, and help determine what criteria or measures of
	success would accurately judge the success of Racine's overall community
	development programs in 2024.An on-line survey was made available to the
	general public and all stakeholders to measure the impact of programs funded
	with CDBG, HOME and ESG over the past five years, on the housing and
	community development needs of low- and moderate-income
	persons/households over the next five years, and on the priorities in the use of
	CDBG, HOME and ESG funds to meet those needs over the next five years. The
	survey was promoted through direct email and social media. Paper copies of the
	survey were distributed at community events and entered manually by staff into
	the on-line format.
Agency/Group/Organization	Homelessness and Housing Alliance of Racine
Agency/Group/Organization Type	Housing
	Services-homeless

# What section of the Plan was addressed by Homeless Needs - Chronically homeless Consultation? Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth **Homelessness Strategy** Briefly describe how the The City of Racine invited current and past program recipients, regional Agency/Group/Organization was consulted. What stakeholders, and practitioners to participate in the consultation process for the are the anticipated outcomes of the consultation or 2020-2024 Consolidated Plan. On October 14, 17, 18, 23 and 29, 2019 areas for improved coordination? department staff conducted public input sessions to solicit insight for the development of the 2020-2024 Consolidated Plan from the general public, regional stakeholders, and past funding recipients. City staff also met with individual agency leadership. Participants from the focus groups and targeted agencies provided input on the strengths and shortcomings of Racine community development programs over the past five years (2014-2019), and anticipated community development needs over the next five years (2020-2024). Participants were asked to identify replicable community development models from other regions, compare these programs, policies or efforts to those currently available in Racine, and help determine what criteria or measures of success would accurately judge the success of Racine's overall community development programs in 2024. An on-line survey was made available to the general public and all stakeholders to measure the impact of programs funded with CDBG, HOME and ESG over the past five years, on the housing and community development needs of low- and moderate-income persons/households over the next five years, and on the priorities in the use of CDBG, HOME and ESG funds to meet those needs over the next five years. The survey was promoted through direct email and social media. Paper copies of the

the on-line format.

survey were distributed at community events and entered manually by staff into

19	Agency/Group/Organization	Hospitality Center
	Agency/Group/Organization Type	Housing
		Services - Housing
		Services-homeless
	What section of the Plan was addressed by	Homeless Needs - Chronically homeless
	Consultation?	Homeless Needs - Families with children
		Homelessness Needs - Veterans
		Homelessness Needs - Unaccompanied youth
		Homelessness Strategy

	Briefly describe how the	The City of Racine invited current and past program recipients, regional
	Agency/Group/Organization was consulted. What	stakeholders, and practitioners to participate in the consultation process for the
	are the anticipated outcomes of the consultation or	2020-2024 Consolidated Plan. On October 14, 17, 18, 23 and 29, 2019
	areas for improved coordination?	department staff conducted public input sessions to solicit insight for the
		development of the 2020-2024 Consolidated Plan from the general public,
		regional stakeholders, and past funding recipients. City staff also met with
		individual agency leadership. Participants from the focus groups and targeted
		agencies provided input on the strengths and shortcomings of Racine community
		development programs over the past five years (2014-2019), and anticipated
		community development needs over the next five years (2020-2024).
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		from other regions, compare these programs, policies or efforts to those
		currently available in Racine, and help determine what criteria or measures of
		success would accurately judge the success of Racine's overall community
		development programs in 2024.An on-line survey was made available to the
		general public and all stakeholders to measure the impact of programs funded
		with CDBG, HOME and ESG over the past five years, on the housing and
		community development needs of low- and moderate-income
		persons/households over the next five years, and on the priorities in the use of
		CDBG, HOME and ESG funds to meet those needs over the next five years. The
		survey was promoted through direct email and social media. Paper copies of the
		survey were distributed at community events and entered manually by staff into
		the on-line format.
0	Agency/Group/Organization	RACINE WOMEN'S RESOURCE CENTER, INC.
	Agency/Group/Organization Type	Services-Children
		Services-Victims of Domestic Violence
		Services-homeless
		Services - Victims

What section of the Plan was addressed by	Housing Need Assessment
Consultation?	Public Housing Needs
	Homeless Needs - Chronically homeless
	Homeless Needs - Families with children
	Homelessness Needs - Veterans
	Homelessness Needs - Unaccompanied youth
	Homelessness Strategy
	Non-Homeless Special Needs
	Market Analysis
	Economic Development
	Anti-poverty Strategy

Briefly describe how the	The City of Racine invited current and past program recipients, regional
Agency/Group/Organization was consulted. What	stakeholders, and practitioners to participate in the consultation process for the
are the anticipated outcomes of the consultation or	2020-2024 Consolidated Plan. On October 14, 17, 18, 23 and 29, 2019
areas for improved coordination?	department staff conducted public input sessions to solicit insight for the
	development of the 2020-2024 Consolidated Plan from the general public,
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	individual agency leadership. Participants from the focus groups and targeted
	agencies provided input on the strengths and shortcomings of Racine communit
	development programs over the past five years (2014-2019), and anticipated
	community development needs over the next five years (2020-2024).
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	from other regions, compare these programs, policies or efforts to those
	currently available in Racine, and help determine what criteria or measures of
	success would accurately judge the success of Racine's overall community
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	general public and all stakeholders to measure the impact of programs funded
	with CDBG, HOME and ESG over the past five years, on the housing and
	community development needs of low- and moderate-income
	persons/households over the next five years, and on the priorities in the use of
	CDBG, HOME and ESG funds to meet those needs over the next five years. The
	survey was promoted through direct email and social media. Paper copies of the
	survey were distributed at community events and entered manually by staff int
	the on-line format.
Agency/Group/Organization	City of Racine/Human Resources
Agency/Group/Organization Type	Other government - Local
	Grantee Department
	Major Employer

# What section of the Plan was addressed by Consultation?

# Anti-poverty Strategy

Briefly describe how the

Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?

The City of Racine invited current and past program recipients, regional stakeholders, and practitioners to participate in the consultation process for the 2020-2024 Consolidated Plan. On October 14, 17, 18, 23 and 29, 2019 department staff conducted public input sessions to solicit insight for the development of the 2020-2024 Consolidated Plan from the general public, regional stakeholders, and past funding recipients. City staff also met with individual agency leadership. Participants from the focus groups and targeted agencies provided input on the strengths and shortcomings of Racine community development programs over the past five years (2014-2019), and anticipated community development needs over the next five years (2020-2024). Participants were asked to identify replicable community development models from other regions, compare these programs, policies or efforts to those currently available in Racine, and help determine what criteria or measures of success would accurately judge the success of Racine's overall community development programs in 2024. An on-line survey was made available to the general public and all stakeholders to measure the impact of programs funded with CDBG, HOME and ESG over the past five years, on the housing and community development needs of low- and moderate-income persons/households over the next five years, and on the priorities in the use of CDBG, HOME and ESG funds to meet those needs over the next five years. The survey was promoted through direct email and social media. Paper copies of the survey were distributed at community events and entered manually by staff into the on-line format.

22	Agency/Group/Organization	RACINE YMCA
	Agency/Group/Organization Type	Services-Children
		Services-Elderly Persons
		Services-Persons with Disabilities
		Services-Health
		Services-Education
	What section of the Plan was addressed by	Housing Need Assessment
	Consultation?	Public Housing Needs
		Homeless Needs - Chronically homeless
		Homeless Needs - Families with children
		Homelessness Needs - Veterans
		Homelessness Needs - Unaccompanied youth
		Non-Homeless Special Needs
		Market Analysis
		Economic Development
		Anti-poverty Strategy

	Briefly describe how the	The City of Racine invited current and past program recipients, regional
	Agency/Group/Organization was consulted. What	stakeholders, and practitioners to participate in the consultation process for the
	are the anticipated outcomes of the consultation or	2020-2024 Consolidated Plan. On October 14, 17, 18, 23 and 29, 2019
	areas for improved coordination?	department staff conducted public input sessions to solicit insight for the
	·	development of the 2020-2024 Consolidated Plan from the general public,
		regional stakeholders, and past funding recipients. City staff also met with
		individual agency leadership. Participants from the focus groups and targeted
		agencies provided input on the strengths and shortcomings of Racine community
		development programs over the past five years (2014-2019), and anticipated
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		community development needs of low- and moderate-income
		persons/households over the next five years, and on the priorities in the use of
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		survey was promoted through direct email and social media. Paper copies of the
		survey were distributed at community events and entered manually by staff into
		the on-line format.
23	Agency/Group/Organization	NAMI
	Agency/Group/Organization Type	Services-Health
		Services-Employment
	What section of the Plan was addressed by	Anti-poverty Strategy
	Consultation?	

	Briefly describe how the	The City of Racine invited current and past program recipients, regional
	Agency/Group/Organization was consulted. What	stakeholders, and practitioners to participate in the consultation process for the
	are the anticipated outcomes of the consultation or	2020-2024 Consolidated Plan. On October 14, 17, 18, 23 and 29, 2019
	areas for improved coordination?	department staff conducted public input sessions to solicit insight for the
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		development programs over the past five years (2014-2019), and anticipated
		community development needs over the next five years (2020-2024).
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		currently available in Racine, and help determine what criteria or measures of
		success would accurately judge the success of Racine's overall community
		development programs in 2024.An on-line survey was made available to the
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		survey was promoted through direct email and social media. Paper copies of the
		survey were distributed at community events and entered manually by staff in
		the on-line format.
	Agency/Group/Organization	City of Racine/Library
	Agency/Group/Organization Type	Services-homeless
		Services-Employment
1		Grantee Department

What section of the Plan was addressed by	Housing Need Assessment
Consultation?	Homeless Needs - Chronically homeless
	Homeless Needs - Families with children
	Homelessness Needs - Veterans
	Homelessness Needs - Unaccompanied youth
	Homelessness Strategy
	Anti-poverty Strategy

Briefly describe how the	The City of Racine invited current and past program recipients, regional
Agency/Group/Organization was co	
are the anticipated outcomes of th	
areas for improved coordination?	department staff conducted public input sessions to solicit insight for the
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	development programs over the past five years (2014-2019), and anticipated
	community development needs over the next five years (2020-2024).
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	from other regions, compare these programs, policies or efforts to those
	currently available in Racine, and help determine what criteria or measures of
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	development programs in 2024. An on-line survey was made available to the
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	with CDBG, HOME and ESG over the past five years, on the housing and
	community development needs of low- and moderate-income
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	survey was promoted through direct email and social media. Paper copies of the
	survey were distributed at community events and entered manually by staff into
	the on-line format.
Agency/Group/Organization	Racine Community Foundation
Agency/Group/Organization Type	Business and Civic Leaders
	Foundation

What section of the Plan was addressed by	Housing Need Assessment
Consultation?	Public Housing Needs
	Homeless Needs - Chronically homeless
	Homeless Needs - Families with children
	Homelessness Needs - Veterans
	Homelessness Needs - Unaccompanied youth
	Homelessness Strategy
	Market Analysis
	Economic Development
	Anti-poverty Strategy

Briefly describe how the	The City of Racine invited current and past program recipients, regional
Agency/Group/Organization was consulted. What	stakeholders, and practitioners to participate in the consultation process for the
are the anticipated outcomes of the consultation or	2020-2024 Consolidated Plan. On October 14, 17, 18, 23 and 29, 2019
areas for improved coordination?	department staff conducted public input sessions to solicit insight for the
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	community development needs of low- and moderate-income
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	CDBG, HOME and ESG funds to meet those needs over the next five years. The
	survey was promoted through direct email and social media. Paper copies of the
	survey were distributed at community events and entered manually by staff int
	the on-line format.
Agency/Group/Organization	Housing Authority of Racine County
Agency/Group/Organization Type	PHA

What section of the Plan was addressed by	Housing Need Assessment
Consultation?	Public Housing Needs
	Homeless Needs - Chronically homeless
	Homeless Needs - Families with children
	Homelessness Needs - Veterans
	Homelessness Needs - Unaccompanied youth
	Homelessness Strategy
	Market Analysis
	Economic Development
	Anti-poverty Strategy

Briefly describe how the	The City of Racine invited current and past program recipients, regional
Agency/Group/Organization was consulted. What	stakeholders, and practitioners to participate in the consultation process for the
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areas for improved coordination?	department staff conducted public input sessions to solicit insight for the
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	survey was promoted through direct email and social media. Paper copies of th
	survey were distributed at community events and entered manually by staff int
	the on-line format.
Agency/Group/Organization	Racine County Continuum of Care
Agency/Group/Organization Type	Housing
	Services - Housing
	Services-homeless

# What section of the Plan was addressed by Homeless Needs - Chronically homeless Consultation? Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth **Homelessness Strategy** Briefly describe how the The City of Racine invited current and past program recipients, regional Agency/Group/Organization was consulted. What stakeholders, and practitioners to participate in the consultation process for the are the anticipated outcomes of the consultation or 2020-2024 Consolidated Plan. On October 14, 17, 18, 23 and 29, 2019 areas for improved coordination? department staff conducted public input sessions to solicit insight for the development of the 2020-2024 Consolidated Plan from the general public, regional stakeholders, and past funding recipients. City staff also met with individual agency leadership. Participants from the focus groups and targeted agencies provided input on the strengths and shortcomings of Racine community development programs over the past five years (2014-2019), and anticipated community development needs over the next five years (2020-2024). Participants were asked to identify replicable community development models from other regions, compare these programs, policies or efforts to those currently available in Racine, and help determine what criteria or measures of success would accurately judge the success of Racine's overall community development programs in 2024. An on-line survey was made available to the general public and all stakeholders to measure the impact of programs funded with CDBG, HOME and ESG over the past five years, on the housing and community development needs of low- and moderate-income persons/households over the next five years, and on the priorities in the use of CDBG, HOME and ESG funds to meet those needs over the next five years. The survey was promoted through direct email and social media. Paper copies of the

the on-line format.

survey were distributed at community events and entered manually by staff into

28	Agency/Group/Organization	Hispanic Roundtable of Racine
	Agency/Group/Organization Type	Services - Housing
		Business and Civic Leaders
	What section of the Plan was addressed by	Housing Need Assessment
	Consultation?	Public Housing Needs
		Homeless Needs - Chronically homeless
		Homeless Needs - Families with children
		Homelessness Needs - Veterans
		Homelessness Needs - Unaccompanied youth
		Homelessness Strategy
		Non-Homeless Special Needs
		Market Analysis
		Economic Development
		Anti-poverty Strategy

Briefl	y describe how the	The City of Racine invited current and past program recipients, regional
	cy/Group/Organization was consulted. What	stakeholders, and practitioners to participate in the consultation process for the
_	ne anticipated outcomes of the consultation or	2020-2024 Consolidated Plan. On October 14, 17, 18, 23 and 29, 2019
areas	for improved coordination?	department staff conducted public input sessions to solicit insight for the
		development of the 2020-2024 Consolidated Plan from the general public,
		regional stakeholders, and past funding recipients. City staff also met with
		individual agency leadership. Participants from the focus groups and targeted
		agencies provided input on the strengths and shortcomings of Racine community
		development programs over the past five years (2014-2019), and anticipated
		community development needs over the next five years (2020-2024).
		Participants were asked to identify replicable community development models
		from other regions, compare these programs, policies or efforts to those
		currently available in Racine, and help determine what criteria or measures of
		success would accurately judge the success of Racine's overall community
		development programs in 2024.An on-line survey was made available to the
		general public and all stakeholders to measure the impact of programs funded
		with CDBG, HOME and ESG over the past five years, on the housing and
		community development needs of low- and moderate-income
		persons/households over the next five years, and on the priorities in the use of
		CDBG, HOME and ESG funds to meet those needs over the next five years. The
		survey was promoted through direct email and social media. Paper copies of the
		survey were distributed at community events and entered manually by staff into
		the on-line format.
Agen	cy/Group/Organization	Knapp Elementary School- Parent Leadership Council
Agen	cy/Group/Organization Type	Civic Leaders
		Neighborhood Organization

What section of the Plan was addressed by	Housing Need Assessment
Consultation?	Public Housing Needs
	Homeless Needs - Chronically homeless
	Homeless Needs - Families with children
	Homelessness Needs - Veterans
	Homelessness Needs - Unaccompanied youth
	Homelessness Strategy
	Non-Homeless Special Needs
	HOPWA Strategy
	Market Analysis
	Economic Development
	Anti-poverty Strategy

	Briefly describe how the	The City of Racine invited current and past program recipients, regional
	Agency/Group/Organization was consulted. What	stakeholders, and practitioners to participate in the consultation process for the
	are the anticipated outcomes of the consultation or	2020-2024 Consolidated Plan. On October 14, 17, 18, 23 and 29, 2019
	areas for improved coordination?	department staff conducted public input sessions to solicit insight for the
	areas for improved coordination.	development of the 2020-2024 Consolidated Plan from the general public,
		regional stakeholders, and past funding recipients. City staff also met with
		individual agency leadership. Participants from the focus groups and targeted
		agencies provided input on the strengths and shortcomings of Racine community
		development programs over the past five years (2014-2019), and anticipated
		community development needs over the next five years (2014-2015), and anticipated
		Participants were asked to identify replicable community development models
		from other regions, compare these programs, policies or efforts to those
		currently available in Racine, and help determine what criteria or measures of
		success would accurately judge the success of Racine's overall community
		development programs in 2024.An on-line survey was made available to the
		general public and all stakeholders to measure the impact of programs funded
		with CDBG, HOME and ESG over the past five years, on the housing and
		community development needs of low- and moderate-income
		persons/households over the next five years, and on the priorities in the use of
		CDBG, HOME and ESG funds to meet those needs over the next five years. The
		survey was promoted through direct email and social media. Paper copies of the
		survey was promoted through direct email and social media. Taper copies of the survey were distributed at community events and entered manually by staff into
		the on-line format.
30	Agency/Group/Organization	Racine Revitalization Partnership
	Agency/Group/Organization Type	Housing
		Service-Fair Housing
	What section of the Plan was addressed by	Housing Need Assessment
	Consultation?	Anti-poverty Strategy

	Briefly describe how the	The City of Racine invited current and past program recipients, regional
	•	
	Agency/Group/Organization was consulted. What	stakeholders, and practitioners to participate in the consultation process for the
	are the anticipated outcomes of the consultation or	2020-2024 Consolidated Plan. On October 14, 17, 18, 23 and 29, 2019
	areas for improved coordination?	department staff conducted public input sessions to solicit insight for the
		development of the 2020-2024 Consolidated Plan from the general public,
		regional stakeholders, and past funding recipients. City staff also met with
		individual agency leadership. Participants from the focus groups and targeted
		agencies provided input on the strengths and shortcomings of Racine community
		development programs over the past five years (2014-2019), and anticipated
		community development needs over the next five years (2020-2024).
		Participants were asked to identify replicable community development models
		from other regions, compare these programs, policies or efforts to those
		currently available in Racine, and help determine what criteria or measures of
		success would accurately judge the success of Racine's overall community
		development programs in 2024.An on-line survey was made available to the
		general public and all stakeholders to measure the impact of programs funded
		with CDBG, HOME and ESG over the past five years, on the housing and
		community development needs of low- and moderate-income
		persons/households over the next five years, and on the priorities in the use of
		CDBG, HOME and ESG funds to meet those needs over the next five years. The
		survey was promoted through direct email and social media. Paper copies of the
		survey were distributed at community events and entered manually by staff into
		the on-line format.
31	Agency/Group/Organization	Visioning A Greater Racine
	Agency/Group/Organization Type	Business and Civic Leaders
	What section of the Plan was addressed by Consultation?	Anti-poverty Strategy

Briefly describe how the	The City of Racine invited current and past program recipients, regional
Agency/Group/Organization was consulted. What	stakeholders, and practitioners to participate in the consultation process for the
are the anticipated outcomes of the consultation or	2020-2024 Consolidated Plan. On October 14, 17, 18, 23 and 29, 2019
areas for improved coordination?	department staff conducted public input sessions to solicit insight for the
	development of the 2020-2024 Consolidated Plan from the general public,
	regional stakeholders, and past funding recipients. City staff also met with
	individual agency leadership. Participants from the focus groups and targeted
	agencies provided input on the strengths and shortcomings of Racine community
	development programs over the past five years (2014-2019), and anticipated
	community development needs over the next five years (2020-2024).
	Participants were asked to identify replicable community development models
	from other regions, compare these programs, policies or efforts to those
	currently available in Racine, and help determine what criteria or measures of
	success would accurately judge the success of Racine's overall community
	development programs in 2024.An on-line survey was made available to the
	general public and all stakeholders to measure the impact of programs funded
	with CDBG, HOME and ESG over the past five years, on the housing and
	community development needs of low- and moderate-income
	persons/households over the next five years, and on the priorities in the use of
	CDBG, HOME and ESG funds to meet those needs over the next five years. The
	survey was promoted through direct email and social media. Paper copies of the
	survey were distributed at community events and entered manually by staff into
	the on-line format.
Agency/Group/Organization	Southern Wisconsin Landlord Association
Agency/Group/Organization Type	Housing
	Business Leaders
What section of the Plan was addressed by	Housing Need Assessment
while section of the Flan was addressed by	Housing Need Assessment

	Driefly describe how the	The City of Desires in the desired as weather the desired was in the desired as a second seco
	Briefly describe how the	The City of Racine invited current and past program recipients, regional
	Agency/Group/Organization was consulted. What	stakeholders, and practitioners to participate in the consultation process for the
	are the anticipated outcomes of the consultation or	2020-2024 Consolidated Plan. On October 14, 17, 18, 23 and 29, 2019
	areas for improved coordination?	department staff conducted public input sessions to solicit insight for the
		development of the 2020-2024 Consolidated Plan from the general public,
		regional stakeholders, and past funding recipients. City staff also met with
		individual agency leadership. Participants from the focus groups and targeted
		agencies provided input on the strengths and shortcomings of Racine community
		development programs over the past five years (2014-2019), and anticipated
		community development needs over the next five years (2020-2024).
		Participants were asked to identify replicable community development models
		from other regions, compare these programs, policies or efforts to those
		currently available in Racine, and help determine what criteria or measures of
		success would accurately judge the success of Racine's overall community
		development programs in 2024.An on-line survey was made available to the
		general public and all stakeholders to measure the impact of programs funded
		with CDBG, HOME and ESG over the past five years, on the housing and
		community development needs of low- and moderate-income
		persons/households over the next five years, and on the priorities in the use of
		CDBG, HOME and ESG funds to meet those needs over the next five years. The
		survey was promoted through direct email and social media. Paper copies of the
		survey were distributed at community events and entered manually by staff into
		the on-line format.
33	Agency/Group/Organization	Wisconsin Department of Natural Resources (DNR)
	Agency/Group/Organization Type	Agency - Managing Flood Prone Areas
		Agency - Management of Public Land or Water Resources
		Agency - Emergency Management
		Other government - State

# What section of the Plan was addressed by Consultation?

Housing Need Assessment Non-Homeless Special Needs Market Analysis

#### Briefly describe how the

Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?

The City of Racine invited current and past program recipients, regional stakeholders, and practitioners to participate in the consultation process for the 2020-2024 Consolidated Plan. On October 14, 17, 18, 23 and 29, 2019 department staff conducted public input sessions to solicit insight for the development of the 2020-2024 Consolidated Plan from the general public, regional stakeholders, and past funding recipients. City staff also met with individual agency leadership. Participants from the focus groups and targeted agencies provided input on the strengths and shortcomings of Racine community development programs over the past five years (2014-2019), and anticipated community development needs over the next five years (2020-2024). Participants were asked to identify replicable community development models from other regions, compare these programs, policies or efforts to those currently available in Racine, and help determine what criteria or measures of success would accurately judge the success of Racine's overall community development programs in 2024. An on-line survey was made available to the general public and all stakeholders to measure the impact of programs funded with CDBG, HOME and ESG over the past five years, on the housing and community development needs of low- and moderate-income persons/households over the next five years, and on the priorities in the use of CDBG, HOME and ESG funds to meet those needs over the next five years. The survey was promoted through direct email and social media. Paper copies of the survey were distributed at community events and entered manually by staff into the on-line format.

34	Agency/Group/Organization	City of Racine/Health Department
	Agency/Group/Organization Type	Services-Health
		Health Agency
		Other government - Local
		Grantee Department
	What section of the Plan was addressed by Consultation?	Lead-based Paint Strategy

Briefly describe how the	The City of Racine invited current and past program recipients, regional
Agency/Group/Organization was consulted. What	stakeholders, and practitioners to participate in the consultation process for the
are the anticipated outcomes of the consultation or	2020-2024 Consolidated Plan. On October 14, 17, 18, 23 and 29, 2019
areas for improved coordination?	department staff conducted public input sessions to solicit insight for the
	development of the 2020-2024 Consolidated Plan from the general public,
	regional stakeholders, and past funding recipients. City staff also met with
	individual agency leadership. Participants from the focus groups and targeted
	agencies provided input on the strengths and shortcomings of Racine communit
	development programs over the past five years (2014-2019), and anticipated
	community development needs over the next five years (2020-2024).
	Participants were asked to identify replicable community development models
	from other regions, compare these programs, policies or efforts to those
	currently available in Racine, and help determine what criteria or measures of
	success would accurately judge the success of Racine's overall community
	development programs in 2024.An on-line survey was made available to the
	general public and all stakeholders to measure the impact of programs funded
	with CDBG, HOME and ESG over the past five years, on the housing and
	community development needs of low- and moderate-income
	persons/households over the next five years, and on the priorities in the use of
	CDBG, HOME and ESG funds to meet those needs over the next five years. The
	survey was promoted through direct email and social media. Paper copies of th
	survey were distributed at community events and entered manually by staff into
	the on-line format.
Agency/Group/Organization	U.S. Cellular
Agency/Group/Organization Type	Services - Broadband Internet Service Providers
	Services - Narrowing the Digital Divide

What section of the Plan was addressed by Consultation?	Anti-poverty Strategy
Briefly describe how the	The City of Racine invited current and past program recipients, regional
Agency/Group/Organization was consulted. What	stakeholders, and practitioners to participate in the consultation process for the
are the anticipated outcomes of the consultation or	2020-2024 Consolidated Plan. On October 14, 17, 18, 23 and 29, 2019
areas for improved coordination?	department staff conducted public input sessions to solicit insight for the
	development of the 2020-2024 Consolidated Plan from the general public,
	regional stakeholders, and past funding recipients. City staff also met with
	individual agency leadership. Participants from the focus groups and targeted
	agencies provided input on the strengths and shortcomings of Racine communit
	development programs over the past five years (2014-2019), and anticipated
	community development needs over the next five years (2020-2024).
	Participants were asked to identify replicable community development models
	from other regions, compare these programs, policies or efforts to those
	currently available in Racine, and help determine what criteria or measures of
	success would accurately judge the success of Racine's overall community
	development programs in 2024.An on-line survey was made available to the
	general public and all stakeholders to measure the impact of programs funded
	with CDBG, HOME and ESG over the past five years, on the housing and
	community development needs of low- and moderate-income
	persons/households over the next five years, and on the priorities in the use of
	CDBG, HOME and ESG funds to meet those needs over the next five years. The
	survey was promoted through direct email and social media. Paper copies of the
	survey were distributed at community events and entered manually by staff int
	the on-line format.

Identify any Agency Types not consulted and provide rationale for not consulting

All relevant agency types were consulted during the input process.

#### Other local/regional/state/federal planning efforts considered when preparing the Plan

Name of Plan	Lead	How do the goals of your Strategic Plan overlap with the goals of each plan?				
	Organization					
		The Racine Continuum of Care, the Racine Homeless Coalition, and the Department of City				
		Development maintain a close working relationship. Staff from the Department regularly attend COC				
Continuum of	Racine Continuum	meetings and are participants on committees and working groups and the City is a member of the				
Care	of Care	COC. In addition, the City has designated homeless assistance as one of its priorities and works with				
		the COC and its members to provide funding for the highest-rated needs identified by homeless				
		providers.				

Table 3 – Other local / regional / federal planning efforts

### **Narrative (optional)**

One resource reviewed during the development process was the Comprehensive Plan for the City of Racine: 2035 that was adopted in November 2009. Although the process of developing the Comprehensive Plan included surveys and public informational meetings for all of Racine County, the resulting objectives and recommendations, especially for Housing Development and Economic Development, are relevant and applicable to the 5- Year Consolidated Plan for the City of Racine.

### **AP-12 Participation – 91.105, 91.200(c)**

1. Summary of citizen participation process/Efforts made to broaden citizen participation Summarize citizen participation process and how it impacted goal-setting

Citizens were notified of public participation opportunities via public notices in the local news media outlets; via email of interested parties; and via public hearings.

One written comment was received on June 30, 2022, from Legal Action of Wisconsin supporting the full allocation of 15% of the total allocation to public services. Staff sent an acknowledgment of the written comment and stated it would be incorporated into the 2022 AAP.

#### **Citizen Participation Outreach**

Sort Order	Mode of Outreach	Target of Outreach	Summary of	Summary of	Summary of comments	URL (If
			response/attendance	comments received	not accepted	applicable)
					and reasons	
	Newspaper Ad	Non-		No comments	No comments rejected	
1		targeted/broad				
		community		recveived		
2	Public Hearing	Non- targeted/broad community	No speakers	No comments were received	No comments were rejected	
3	e-mail	Current, former, and potentially interested grantees	One written comment was received via email.	The commenter wrote in favor of fully funding 15% of CDBG funds for the public service category.	No comments were rejected.	

### Table 4 – Citizen Participation Outreach

# **Expected Resources**

# **AP-15 Expected Resources – 91.220(c)(1,2)**

#### Introduction

If the total grant received by the City of Racine is less than the funds allocated to activities, then each activity's budget will be reduced in the same proportion as the percentage difference between the estimated total grant and the actual total grant. If the total grant received by the City of Racine is more than the funds allocated to activities, then the budget of any activity that received an allocation less than the amount requested by the applicant, due to the estimated lack of funds, will be increased in the same proportion as the percentage difference between the estimated total grant and the actual total grant, up to the amount of the applicant's original request.

#### **Anticipated Resources**

Program	Source	Uses of Funds	Expected Amount Available Year 1			ear 1	Expected	Narrative Description
	of Funds		Annual	Program	Prior Year	Total:	Amount	
			Allocation:	Income:	Resources:	\$	Available	
			\$	\$	\$		Remainder	
							of ConPlan	
CDBG	public -	Acquisition					ş	CDBG funds will be used to meet
CDBG	•	•						
	federal	Admin and						the identified needs and the
		Planning						housing and non-housing goals
		Economic						established in this Consolidated Plan
		Development						
		Housing						
		Public						
		Improvements						
		Public Services	1,864,293	443,751	0	2,308,044	0	

Annual Action Plan 2022

Source	Uses of Funds	Expected Amount Available Year 1				Expected	Narrative Description
of Funds		Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$	Amount Available Remainder of ConPlan \$	
public - federal	Acquisition Homebuyer assistance Homeowner rehab Multifamily rental new construction Multifamily rental rehab New construction for ownership						The HOME funds will be used to meet the identified housing needs and housing goals established in this Consolidated Plan
public - federal	Conversion and rehab for transitional housing Financial Assistance Overnight shelter Rapid re-housing (rental assistance) Rental Assistance Services Transitional						The ESG funds will be used to meet the shelter, housing, and support services needs of persons who are homeless or may soon become homeless within the City of Racine.
	public - federal	public - Acquisition federal Homebuyer assistance Homeowner rehab Multifamily rental new construction Multifamily rental rehab New construction for ownership TBRA  public - Conversion and federal rehab for transitional housing Financial Assistance Overnight shelter Rapid re-housing (rental assistance) Rental Assistance Services	public - Acquisition federal Homebuyer assistance Homeowner rehab Multifamily rental new construction Multifamily rental rehab New construction for ownership TBRA 704,930  public - Conversion and federal rehab for transitional housing Financial Assistance Overnight shelter Rapid re-housing (rental assistance) Rental Assistance Services Transitional	public - federal Homebuyer assistance Homeowner rehab Multifamily rental new construction for ownership TBRA 704,930 34,929  public - federal Conversion and federal housing Financial Assistance Overnight shelter Rapid re-housing (rental assistance) Rental Assistance Services Transitional	Annual Allocation: \$ Program Income: \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$	Annual Allocation: \$ Program Resources: \$ \$   public - federal Homebuyer assistance Homeowner rehab Multifamily rental new construction Multifamily rental rehab New construction for ownership TBRA 704,930 34,929 0 739,859  public - federal Homebuyer assistance Homeowner rehab Multifamily rental rehab New construction for ownership TBRA 704,930 34,929 0 739,859  public - federal Conversion and rehab for transitional housing Financial Assistance Overnight shelter Rapid re-housing (rental assistance) Rental Assistance Services Transitional	Annual Allocation: \$ Program Income: \$ \$ Naviable Remainder of ConPlan \$  public - Homebuyer assistance Homeowner rehab Multifamily rental new construction for ownership TBRA 704,930 34,929 0 739,859 0  public - transitional Acquisition Homebuyer assistance Homeowner rehab New construction for ownership TBRA 704,930 34,929 0 739,859 0

Table 5 - Expected Resources – Priority Table

# Explain how federal funds will leverage those additional resources (private, state and local funds), including a description of how matching requirements will be satisfied

In its funding decisions, Racine places a high priority on leveraging. Activities whose proponents have identified or secured private and non-federal public funding sources are given additional consideration during the grant allocation process. Private, not-for-profit organization administrators are actively encouraged to search out such funding sources in order to ensure the long-term sustainability of their organizations. Program administrators are also encouraged to cite the award of CDBG, HOME, or ESG funds when submitting applications for private and non-federal public grant funding. Recipients of CDBG, HOME, and ESG funds are required to report the source(s) and amount(s) of all other funding sources, which contributed to a specific activity. Some specific examples of other funding sources include in-kind contributions; foundation grants; individual contributions and donations; private capital loans and grants; and private equity investments.

# If appropriate, describe publically owned land or property located within the jurisdiction that may be used to address the needs identified in the plan

The City of Racine is currently working with Racine County to finalize a process for receiving properties that the County receives via in rem tax foreclosure and using them to create affordable housing opportunities. Although CDBG, HOME, or ESG funds could be used in this program depending on its final form and financing needs, none of these funding sources are anticipated to be used at this time.

#### Discussion

n/a

# **Annual Goals and Objectives**

# **AP-20 Annual Goals and Objectives**

# **Goals Summary Information**

Sort	Goal Name	Start	End	Category	Geographic	Needs Addressed	Funding	Goal Outcome Indicator
Order		Year	Year		Area			
1	Support for Existing	2020	2024	Affordable	City of	Support for Existing	CDBG:	Homeowner Housing
	Owner Housing			Housing	Racine	Owner Housing	\$105,603	Rehabilitated: 9 Household
								Housing Unit
2	New	2020	2024	Affordable	City of	New Homeownership	HOME:	Homeowner Housing Added: 2
	Homeownership			Housing	Racine	Housing	\$387,394	Household Housing Unit
	Housing							
3	Rental Housing	2020	2024	Affordable	City of	Rental Housing	HOME:	Rental units rehabilitated: 3
				Housing	Racine		\$140,986	Household Housing Unit
				Non-Homeless	LMI Census			Tenant-based rental assistance /
				Special Needs	Tracts			Rapid Rehousing: 25 Households
								Assisted
4	Viable CHDOs	2020	2024	Affordable	City of	New Homeownership	HOME:	Homeowner Housing Added: 1
				Housing	Racine	Housing	\$140,986	Household Housing Unit
						Viable CHDOs		
5	Homelessness	2020	2024	Affordable	City of	Homelessness Services	ESG:	Homeless Person Overnight
	Services			Housing	Racine		\$148,043	Shelter: 382 Persons Assisted
				Homeless				

Sort	Goal Name	Start	End	Category	Geographic	Needs Addressed	Funding	Goal Outcome Indicator
Order		Year	Year		Area			
6	Code Enforcement	2020	2024	Affordable	City of	Code Compliance	CDBG:	Housing Code
				Housing	Racine		\$503,360	Enforcement/Foreclosed
					LMI Census			Property Care: 660 Household
					Tracts			Housing Unit
7	Economic Mobility	2020	2024	Non-Housing	City of	Economic Mobility	CDBG:	Public service activities other
				Community	Racine		\$140,723	than Low/Moderate Income
				Development	LMI Census			Housing Benefit: 100 Persons
					Tracts			Assisted
8	Homeownership	2020	2024	Affordable	LMI Census	New Homeownership	CDBG:	Public service activities other
	Services and			Housing	Tracts	Housing	\$140,421	than Low/Moderate Income
	Community			Non-Housing		Homeownership		Housing Benefit: 323 Persons
	Stabilization			Community		Services and		Assisted
				Development		Community		
						Stabilization		
10	Microenterprise	2020	2024	Non-Housing	City of	Economic	CDBG:	Businesses assisted: 23
	Assistance			Community	Racine	Development/Micro-	\$243,918	Businesses Assisted
				Development	LMI Census	Enterprises		
					Tracts			
11	Public	2020	2024	Non-Housing	LMI Census	Homeownership	CDBG:	Public Facility or Infrastructure
	Infrastructure and			Community	Tracts	Services and	\$804,221	Activities other than
	Facilities			Development		Community		Low/Moderate Income Housing
						Stabilization		Benefit: 393 Persons Assisted

Sort	Goal Name	Start	End	Category	Geographic	Needs Addressed	Funding	Goal Outcome Indicator
Order		Year	Year		Area			
12	Administration	2020	2024	Administration	City of	Administration	CDBG:	Other: 6 Other
					Racine		\$372,858	
							HOME:	
							\$70,493	
							ESG:	
							\$12,003	
13	Blight Elimination	2020	2024	Non-Housing	City of	Blight Elimination	CDBG: \$0	Buildings Demolished: 0
				Community	Racine			Buildings
				Development	LMI Census			
					Tracts			
					Greater			
					Uptown			
					NRSA			

Table 6 – Goals Summary

# **Goal Descriptions**

1	Goal Name	Support for Existing Owner Housing
	Goal Description	Improve existing housing supply, choice (units brought to code, energy or accessibility standards)
2	Goal Name	New Homeownership Housing
	Goal Description	Help eligible households become homeowners through construction subsidy and/or direct homebuyer assistance.

3	Goal Name	Rental Housing
	Goal Description	Encourage responsible rental property ownership of units through proactive inspection/ develop special needs housing units or provide rental assistance with TBRA.
4	Goal Name	Viable CHDOs
	Goal Description	Provide development and/or operating funds to CHDO for eligible set-aside CHDO projects.
5	Goal Name	Homelessness Services
	Goal Description	Mitigate or prevent homelessness.
6	Goal Name	Code Enforcement
	Goal Description	Inspectors and staff will be assigned to perform proactive inspections using the newly adopted RENTS ordinance in the Neighborhood Stabilization and Enhancement District of the City of Racine. Other eligible code enforcement expenses may also be incurred.
7	Goal Name	Economic Mobility
	Goal Description	Funds will be used to support organizations that provide training for City of Racine residents to move into living-wage employment or programs that minimize barriers to accessing training.
8	Goal Name	Homeownership Services and Community Stabilization
	Goal Description	Increase the number of homeowners in the City of Racine and facilitate existing residents' paths to homeownership.
10	Goal Name	Microenterprise Assistance
	Goal Description	Assist development of and success of Micro-businesses.

11	Goal Name	Public Infrastructure and Facilities
	Goal Description	Funds will be prioritized for capital improvements at community centers and physical work necessary to expand the provision of healthcare services to low-/moderate-income households in the City. Other potential uses include neighborhood infrastructure such as park equipment, public art, or transit improvements.
12	Goal Name	Administration
	Goal	n/a
	Description	
13	<b>Goal Name</b>	Blight Elimination
	Goal	Removal of blighted properties in LMI Census Tracts.
	Description	

# **Projects**

# AP-35 Projects - 91.220(d)

## Introduction

The following are Projects to be funded in 2022:

## **Projects**

#	Project Name
1	Support for Existing Owner Housing
2	New Homeownership Housing
3	Rental Housing
4	Viable CHDO's
5	2022 - ESG
6	Code Enforcement
7	Economic Mobility
8	Homeownership Services and Community Stabilization
9	Microenterprise Assistance
10	Public Infrastructure and Facilities
11	Administration
12	Blight Elimination

**Table 7 - Project Information** 

# Describe the reasons for allocation priorities and any obstacles to addressing underserved needs

Funds are allocated based on the 2020-2024 Consolidated Plan. The plan has been approved by the City of Racine Community Development Block Grant Advisory Board and affirmed by the City of Racine Common Council. Funding priorities have been created to provide maximum impact to serve the highest unmet need within the City of Racine.

# **AP-38 Project Summary**

**Project Summary Information** 

1	Project Name	Support for Existing Owner Housing
	Target Area	City of Racine
	Goals Supported	Support for Existing Owner Housing
	Needs Addressed	Support for Existing Owner Housing
	Funding	:
	Description	Support for Existing Owner Housing
	Target Date	12/31/2022
	Estimate the number and type of families that will benefit from the proposed activities	9 households will be served via the CDBG Loan FUnd
	<b>Location Description</b>	Units will be located throughout the City of Racine
	Planned Activities	Rehabilitation of existing homeowner occupied units.
2	Project Name	New Homeownership Housing
	Target Area	City of Racine Greater Uptown NRSA
	Goals Supported	New Homeownership Housing
	Needs Addressed	New Homeownership Housing
	Funding	CDBG: \$105,603 HOME: \$387,394
	Description	Creation of Homeonwerhsip units for low to moderate-income households.
	Target Date	12/31/2022
	Estimate the number and type of families that will benefit from the proposed activities	Three townhome units will be created via a CBDO within the greater Uptown NRSA. 2 single-family ownership units will be created.
	Location Description	Townhomes will be located at 1200 Highland Ave. Racine, WI 53403 within the Greater Uptown NRSA
	Planned Activities	Development of three unit townhomes and two single-family properties.
3	Project Name	Rental Housing
	Target Area	City of Racine

	Goals Supported	Rental Housing
	Needs Addressed	Rental Housing
	Funding	HOME: \$140,986
	Description	Creation or rehabilitation of rental housing units
	Target Date	12/31/2022
	Estimate the number	At least two rental units will be created. Targeted to LMI households.
	and type of families that will benefit from	
	the proposed activities	
	Location Description	n/a
	Planned Activities	
4	Project Name	Viable CHDO's
	Target Area	City of Racine
	Goals Supported	Viable CHDOs
	Needs Addressed	Viable CHDOs
	Funding	HOME: \$140,986
	Description	CHDO Set Aside
	Target Date	12/31/2022
	Estimate the number	Viable CHDO Operating and Reserves.
	and type of families that will benefit from	
	the proposed activities	
	Location Description	n/a
	Planned Activities	New Homeownership Housing within the City of Racine.
5	Project Name	2022 - ESG
	Target Area	City of Racine
	Goals Supported	Homelessness Services
	Needs Addressed	Homelessness Services
	Funding	ESG: \$148,043
	Description	ESG Homelessness Services.
	Target Date	12/31/2022

	Estimate the number and type of families that will benefit from the proposed activities	382 Households will be served in partnership with the Racine City and County Continuum of Care.
	Location Description	City of Racine
	Planned Activities	Shelter, Prevention, Rapid ReHousing, HMIS, Admin
6	Project Name	Code Enforcement
	Target Area	City of Racine Neighborhood Stabilization and Enhancement District
	Goals Supported	Code Enforcement
	Needs Addressed	Code Compliance
	Funding	CDBG: \$503,360
	Description	Inspectors and staff will be assigned to perform proactive inspections using the newly adopted RETNS ordinance in the Neighborhood Stabilization and Enhancement Districts of the Coty of Racine. Other eligible code enforcement expenses may also be incurred.
	Target Date	12/31/2022
	Estimate the number and type of families that will benefit from the proposed activities	660 households will be served via code enforcement.
	<b>Location Description</b>	Neighborhood Stabilization and Enhancement District
	Planned Activities	Proactive interior code enforcement within the Neighborhood Stabilization and Enhancement District, and other eligible code enforcement activities incurred.
7	Project Name	Economic Mobility
	Target Area	City of Racine LMI Census Tracts
	Goals Supported	Economic Mobility
	Needs Addressed	Economic Mobility
	Funding	CDBG: \$271,000
	Description	Funds will be used to support organizations that provide training for City of Racine residents to move into living-wage employment or programs that minimize barriers to accessing training.

	Target Date	12/31/2022
	Estimate the number and type of families that will benefit from the proposed activities	6,000 via area benefit.
	Location Description	LMI census tracts community centers.
	Planned Activities	Extended hours for community centers for training programs for youth, mental health services for RUSD community schools.
8	Project Name	Homeownership Services and Community Stabilization
	Target Area	City of Racine
	Goals Supported	Homeownership Services and Community Stabilization
	Needs Addressed	Homeownership Services and Community Stabilization
	Funding	CDBG: \$8,643
	Description	Increase the number of homeowners in the City of Racine and facilitate existing residents' paths to homeownership.
	Target Date	12/31/2022
	Estimate the number and type of families that will benefit from the proposed activities	Approximately 20 households will receive assistance.
	Location Description	City of Racine
	Planned Activities	Homeownership counseling.
9	Project Name	Microenterprise Assistance
	Target Area	City of Racine
	Goals Supported	Microenterprise Assistance
	Needs Addressed	Economic Development/Micro-Enterprises
	Funding	CDBG: \$242,359
	Description	Assist in the development and success of micro-enterprises.
	Target Date	12/31/2022
	Estimate the number and type of families that will benefit from the proposed activities	23 micro-enterprises assisted.

	Location Description	City of Racine
	Planned Activities	Development and success of micro-enterprises.
10	Project Name	Public Infrastructure and Facilities
	Target Area	City of Racine LMI Census Tracts
	Goals Supported	Public Infrastructure and Facilities
	Needs Addressed	Public Infrastructure and Facilities
	Funding	CDBG: \$549,221
	Description	Funds will be prioritized for capital improvements at community centers and physical work necessary to expand the provision of healthcare services to low/moderate-income households in the City. Other potential uses include neighborhood infrastructures such as park equipment, public art, or transit improvements.
	Target Date	12/31/2022
	Estimate the number and type of families that will benefit from the proposed activities	393 LMI households will be served.
	<b>Location Description</b>	City of Racine, LMI Census tracts.
	Planned Activities	Public infrastructure improvements especially of community centers in LMI areas.
11	Project Name	Administration
	Target Area	City of Racine
	Goals Supported	Administration
	Needs Addressed	Administration
	Funding	CDBG: \$372,858 HOME: \$70,493 ESG: \$12,003
	Description	Adminsitration
	Target Date	12/31/2022
	Estimate the number and type of families that will benefit from the proposed activities	6

	Location Description	City of Racine
	Planned Activities	Adminstration
12	Project Name	Blight Elimination
	Target Area	City of Racine
	Goals Supported	Blight Elimination
	Needs Addressed	Blight Elimination
	Funding	CDBG: \$255,000
	Description	Removal of Blighted Properties
	Target Date	12/31/2022
	Estimate the number and type of families	3,000 via area benefit
	that will benefit from the proposed activities	
	Location Description	LMI Census tracts
	Planned Activities	Removal of blighted properties in LMI Census Tracts

## AP-50 Geographic Distribution – 91.220(f)

# Description of the geographic areas of the entitlement (including areas of low-income and minority concentration) where assistance will be directed

Assistance under the Community Development Block Grant (CDBG), HOME Housing Investment Partnerships, and Emergency Shelter Grant (ESG) programs is directed toward lower-income individuals, households, and areas as defined by the U.S. Department of Housing and Urban Development (HUD). A map of Racine's lower-income areas is attached to this Plan.

### Geographic Distribution:

100% of CDBG and ESG funds will be directed to LMI areas or households, with the potential exception of activities that are qualified as slum/blight remediation on a spot basis. All of the funds dedicated to public facilities and infrastructure, and many of those dedicated to the Greater Uptown NRSA, are directed to the neighborhoods located within the LMI census tracts. However, a much higher percentage of the funds may be expended within the LMI census tracts, but the use of the LMI individual direct benefit national objective for housing, public service, or economic development activities does not require that a beneficiary is from an LMI census tract.

HOME dollars are spent in any geographic area of the City where the recipient is LMI income-eligible.

There is a correlation between Racine's lower-income areas and its areas of racial concentration. According to the 2010 U.S. Census, nearly 41,000 persons (53 percent of Racine's total population) live in low- to moderate-income (LMI) areas. Of the number in LMI areas, approximately 12,200 (30%) are African-American and 10,500 (26%) are Hispanic/Latino, more than the representative population of each group among the population of the City as a whole.

#### **Geographic Distribution**

Target Area	Percentage of Funds
City of Racine	75
LMI Census Tracts	25
Greater Uptown NRSA	
Neighborhood Stabilization and Enhancement District	

**Table 8 - Geographic Distribution** 

## Rationale for the priorities for allocating investments geographically

City of Racine budgetary policy and long-standing practice requires that federal Community Development Block Grant (CDBG), HOME Housing Investment Partnerships (HOME) Program and Emergency Solutions Grant (ESG) funds are invested within the City limits. Furthermore, federal

regulations governing these grant programs require that funding be directed primarily to the benefit of lower-income persons, households, or areas as defined by the U.S. Department of Housing and Urban Development. In its allocation decisions, Racine has historically targeted over 95 percent of its funding to serve lower-income persons, households, or areas.

#### Discussion

n/a

# **Affordable Housing**

# AP-55 Affordable Housing – 91.220(g)

#### Introduction

The following addresses the number of households to be assisted for affordable housing in Racine.

One Year Goals for the Number of Households to	be Supported
Homeless	156
Non-Homeless	23
Special-Needs	25
Total	204

Table 9 - One Year Goals for Affordable Housing by Support Requirement

One Year Goals for the Number of Households Supported Thro				
Rental Assistance	30			
The Production of New Units	0			
Rehab of Existing Units	9			
Acquisition of Existing Units	0			
Total	39			

Table 10 - One Year Goals for Affordable Housing by Support Type

## Discussion

Affordable housing is defined as rental housing for low to moderate income individuals meeting HOME rental guidance standards for High HOME Units and Low HOME Units, all housing developed will be monitored for compliance. Homeownership will be in compliance with HOME guidelines, all households will be income qualified and ownership unit affordability will be restricted for prescribed terms via a land use restriction agreement.

# **AP-60 Public Housing – 91.220(h)**

#### Introduction

HARC will continue to communicate and listen to residents concerning their needs and goals.

Actions planned during the next year to address the needs to public housing

HARC will continue to communicate and listen to residents concerning their needs and goals.

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

HARC regularly communicates Authority plans and events to public housing and voucher participants and provides public hearings and complaint/suggestion channels to solicit resident suggestions.

If the PHA is designated as troubled, describe the manner in which financial assistance will be provided or other assistance

n/a

#### Discussion

HUD has not designated HARC as a 'troubled" housing authority

# AP-65 Homeless and Other Special Needs Activities – 91.220(i) Introduction

Racine's strategy for addressing homelessness and the priority needs of homeless persons and families (including the subpopulations identified in the needs section) includes the following:

Provide support by participating in HHARC/COC meetings and initiatives. This includes assigning a member of the City Development staff designated as a liaison with the HHARC and attending its meetings.

Support the HHARC/COC's Performance and Strategic Initiatives of the HHARC/COC. These initiatives are:

- Strategic Initiative 1: Breaking the cycle of evictions
- Strategic Initiative 2: Overcoming stereotypes and misconceptions about homelessness
- Strategic Initiative 3: Maximizing housing impact

Describe the jurisdictions one-year goals and actions for reducing and ending homelessness including

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

The COC has identified a need for habitable and affordable housing for persons who are not chronically homeless. To that end, the City will continue its pursuit of affordable rental housing and work with the COC and its member organizations to utilize HOME, CDBG, and other affordable housing funds to increase the number of units of affordable housing in Racine.

#### Addressing the emergency shelter and transitional housing needs of homeless persons

The City will continue its policy of making 95% of Emergency Solutions Grant (ESG) funding eligible to be allocated for emergency shelter, homelessness prevention, rapid re-housing, and administration including administration of the Homeless Management Information System (HMIS). The COC provides recommendations to the city for funding. The City does this to complement larger sources including Continuum of Care, United Way, private donations, etc., which can be used to mitigate the bigger homelessness prevention issues.

Helping homeless persons (especially chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth) make the transition to permanent housing and independent living, including shortening the period of time that individuals and families experience homelessness, facilitating access for homeless individuals

and families to affordable housing units, and preventing individuals and families who were recently homeless from becoming homeless again

Using CDBG and HOME funds, the City will strive to increase the number of safe rental units by "Encouraging responsible rental property ownership of units through proactive inspection/developing special needs housing units or provide rental assistance TBRA" as per Goal 3 of this Consolidated Plan. This funding is directly related to COC Strategic Initiatives 1 and 3.

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

The City of Racine intends to provide around 7.5% of its CDBG public services funding allocation to the training of Racine residents, including those being discharged from public institutions or receiving public assistance, in pathways to living wage employment. Gaining stable employment will assist these residents in building self-sufficiency. These goals related to COC Strategic Initiative 3. Provide support to the Racine United Way which is undertaking a number of initiatives that affect the homeless and those at risk of becoming homeless.

#### Discussion

n/a

# AP-75 Barriers to affordable housing – 91.220(j)

#### Introduction:

The following addresses the actions to be taken during the 2020-2024 time period to address barriers to affordable housing in Racine.

Actions it planned to remove or ameliorate the negative effects of public policies that serve as barriers to affordable housing such as land use controls, tax policies affecting land, zoning ordinances, building codes, fees and charges, growth limitations, and policies affecting the return on residential investment

In 2022 Racine will invest CDBG and HOME funds in the production or rehabilitation of affordable housing through its own housing rehabilitation loan program as well as through public and private third parties proposing similar activities. HOME funds will be expended to provide tenant-based rent assistance and support affordable rental and homeownership opportunities. Racine will cooperate with developers seeking Section 42 low-income housing tax credits, and city officials will assist the staff of the Housing Authority of Racine County to serve as many income-eligible households in need of housing assistance as possible.

#### Discussion:

n/a

## **AP-85 Other Actions – 91.220(k)**

#### Introduction:

The following actions will be taken during 2022 to address underserved needs, foster and maintain affordable housing, reduce lead-based paint hazards, reduce the number of families living in poverty, develop institutional structure, and enhance coordination among public and private agencies

### Actions planned to address obstacles to meeting underserved needs

Racine's experience has been that the predominant obstacle to meeting underserved needs is a lack of funding. City staff and elected officials will continue to work with affected agencies to identify alternate funding sources, which will enable them to meet a larger portion of the community's needs. Such sources include funding from federal, state, and local governments as well as the private sector. The City has built a considerable network of non-profit and for-profit partners who are able to assist in the furtherance of the goals identified in this plan, but additional financial resources are needed to truly expand impact.

### Actions planned to foster and maintain affordable housing

During the 2022 program year, Racine will invest CDBG and HOME funds in the production or rehabilitation of affordable housing through its own housing rehabilitation loan program and work with non-profit and private partners, while also working with the FEC and other partners to counsel income-eligible prospective homeowners. HOME funds will be used to enhance the availability of affordable homeownership and rental opportunities, and may also be expended to provide tenant-based rent assistance. Racine will coordinate with developers seeking Section 42 low-income housing tax credits in ways that meet City priorities, and City officials will coordinate with the staff of the Housing Authority of Racine County to reach a larger number of eligible households' collaborative use of resources.

#### Actions planned to reduce lead-based paint hazards

Racine has one of the most aggressive lead-based paint hazard reduction programs in the state of Wisconsin. Annually nearly 3,500 school-aged children are tested for lead poisoning. Those found to have been poisoned are referred for further evaluation and treatment and their homes are inspected to determine the environmental source(s) of lead. Parents are counseled on housing maintenance practices that will reduce or eliminate lead dust in the home. All these activities are carried out by the Racine Health Department, which also prepares public education materials and makes public presentations on lead-based paint hazards and how to avoid them. Racine will continue to participate in a HUD-funded joint Racine-Kenosha County program to increase awareness of the hazards of lead-based paint and to eliminate those hazards through rehabilitation loans and grants.

The City of Racine offers CDBG-funded low-interest loans to participants in the HUD-funded Racine-

Kenosha program to cover any additional costs as needed and also rectify non-lead Housing Quality Standards violations in the occupied structures. The City's Neighborhood Services Division has adopted and continues to implement a series of procedures and policies, which comply with federal lead-based paint hazard reduction regulations. Private, not-for-profit housing organizations receiving CDBG and HOME grant funds are monitored for their compliance with the lead-based paint hazard regulations.

#### Actions planned to reduce the number of poverty-level families

The City has adopted these major strategies to achieve goals of poverty reduction:

#### 1. Financial Empowerment

The City of Racine was selected last fall by the Cities for Financial Empowerment Fund (CFE Fund) to join a cohort of local governments that are planning to launch Financial Empowerment Centers. The CFE Fund, a national non-profit organization, is working to replicate the FEC model in up to fifty cities over the next few years. The City of Racine is working closely with the CFE Fund and key local stakeholders, including lead partner Housing Resources, Inc. (HRI), to design the Racine Financial Empowerment Center (FEC). Launching and sustaining the Racine FEC is critically important to achieving shared goals among local partners of increasing minority homeownership, supporting our workforce, reducing disparities, and growing the City's middle class. The FEC and HRI staff will provide in-depth technical assistance to participant households to build their credit scores, and enhance their ability to access and hold well-paying jobs as well as homeownership opportunities.

## 2. Improve Educational and Workforce Skill Attainment

In addition to leveraging the FEC, the City has also partnered with a number of local and national organizations to improve educational outcomes such as high school diploma attainment and HSED/GED attainment. The City is also committed to supporting workforce development initiatives to ensure that City residents have opportunities to enhance their skillsets and qualify for living wage jobs, which will provide a path for economic mobility among Racine residents who are currently unemployed or underemployed.

#### 3. Provide Enhanced Healthcare Services

The City is committed to opening a Federally Qualified Healthcare Center (FQHC) at Julian Thomas Elementary School, which would provide reduced-cost healthcare services to low-income households that are currently enrolled in Medicare or Medicaid or are unable to afford premiums under a private insurance plan. This proposed FQHC is expected to come online in mid-2020 and will reduce healthcare

costs for many households that would also qualify to benefit from CDBG- or HOME-funded initiatives.

#### Actions planned to develop institutional structure

The City of Racine and its administrative departments will continue to participate in meetings and other activities of organizations such as the Homelessness and Housing Alliance of Racine County/Continuum of Care. Similarly, City staff maintains relationships with groups promoting the economic development of Racine and the Milwaukee-Racine metropolitan area and participates in the development of new partnerships to further that goal.

The City of Racine employs a Community Development Compliance Specialist/Fair Housing Officer, Brittany Brown, with 25% of his time dedicated to Fair Housing activities, enforcement, planning, and coordination of goals set in the City's Analysis of Impediments to Fair Housing Choice. A total of \$55,255 in fair housing expenses (salaries, benefits, marketing materials, etc.) has been budgeted for 2022, to be paid using CDBG administration funds. The City of Racine Fair Housing services are provided under the Neighborhood Services Division, and consist of referrals to legal assistance services and/or HUD Fair Housing enforcement staff as appropriate. Monthly reports and local enforcement of the City of Racine's Fair Housing Ordinance are delivered to the Affirmative Action and Human Rights Commission. Testing and Investigations of Fair Housing-related matters are provided by the City of Racine, Community Development Compliance Specialist/Fair Housing Officer and can be contracted on an as-needed basis through the Metropolitan Milwaukee Fair Housing Council. The City of Racine is committed to ensuring compliance with Federal, State, and local Fair Housing regulations throughout the community, and is continuously examining ways in which fair housing services to residents can be enhanced.

# Actions planned to enhance coordination between public and private housing and social service agencies

During the 2021 program year, City staff and elected officials will continue to work with affected agencies to identify alternate funding sources, which will enable them to meet a larger portion of the community's needs. Such sources include funding from federal, state, and local governments as well as

Discussion:	
the issue.	
endeavor to work with interested parties to identify the appropriate organization or entity to address	
the private sector. When the lack of institutional structure is the issue, City and elected officials will	
30 miles ( 1 mil	

n/a

# **Program Specific Requirements**

# AP-90 Program Specific Requirements – 91.220(I)(1,2,4)

#### Introduction:

The following addresses the program-specific requirements at 91.220(I)(1,2,4)

# Community Development Block Grant Program (CDBG) Reference 24 CFR 91.220(I)(1)

Projects planned with all CDBG funds expected to be available during the year are identified in the Projects Table. The following identifies program income that is available for use that is included in projects to be carried out.

1. The total amount of program income that will have been received before the start of the	
next program year and that has not yet been reprogrammed 443	13,751
2. The amount of proceeds from section 108 loan guarantees that will be used during the	
year to address the priority needs and specific objectives identified in the grantee's	
strategic plan.	0
3. The amount of surplus funds from urban renewal settlements	0
4. The amount of any grant funds returned to the line of credit for which the planned use	
has not been included in a prior statement or plan	0
5. The amount of income from float-funded activities	0
Total Program Income: 443	13,751

#### **Other CDBG Requirements**

1. The amount of urgent need activities

0

2. The estimated percentage of CDBG funds that will be used for activities that benefit persons of low and moderate income. Overall Benefit - A consecutive period of one, two or three years may be used to determine that a minimum overall benefit of 70% of CDBG funds is used to benefit persons of low and moderate income. Specify the years covered that include this Annual Action Plan.

80.00%

# HOME Investment Partnership Program (HOME) Reference 24 CFR 91.220(I)(2)

1. A description of other forms of investment being used beyond those identified in Section 92.205 is as follows:

No forms of investment outside of those identified in Section 92.205 are anticipated to be used in

Annual Action Plan

the upcoming 5-year plan.

2. A description of the guidelines that will be used for resale or recapture of HOME funds when used for homebuyer activities as required in 92.254, is as follows:

Recapture. The City of Racine will use the following recapture provisions in all cases that involve a direct subsidy to a buyer of a HOME-assisted property that reduces the purchase price from a fair market value to an affordable price. In the event of a voluntary or involuntary transfer of the property during the period of affordability, the City will recapture all or a portion of the direct subsidy from the homebuyer. HOME-funded direct subsidy may be provided as Down Payment Assistance (DPA) in the form of a loan. The loan is a recorded mortgage and promissory note that specify that the HOME subsidy (the DPA) will be recaptured (conversely, forgiven) on a pro-rata basis for the time the homeowner has owned and occupied the housing, measured against the required affordability period. The City of Racine intends to provide no more than \$14,999 in DPA to households depending on underwriting and subsidy layering, which amounts to a 5-year affordability period. The DPA will be forgiven at a rate of 20% per year until the loan is forgiven in its entirety. This is consistent with 24 CFR 92.254 (a)(5)(ii)(A)(2). If the net proceeds from a voluntary or involuntary sale are insufficient to repay the amount of the HOME subsidy, the City shall recapture the unforgiven balance due on the direct subsidy loan or 100 percent of net proceeds from the sale, whichever is less. If there are no net proceeds from the sale, no repayment is required. "Net proceeds" is defined as the sales price minus superior loan repayment and any closing costs incurred by the homebuyer.

**Resale.** The City of Racine will use the following resale provisions in all cases that involve a sale of a HOME-assisted property without a direct subsidy to the buyer. Such HOME-assisted properties sold during the period of affordability must be sold to a family that qualifies as a low-income family and will use the home as the family's principal residence.

The seller is entitled to a fair return on their investment, which is defined as the increase in value of owner equity and investment during the time that the owner owned the property. The maximum fair return is calculated by multiplying the original purchase price of the property by the cumulative percentage of change in the Housing Price Index (HPI) calculator of the Federal Housing Finance Agency (+1) plus the documented capital improvements at the property, then subtracting the original investment amount. For example, if a home was purchased in 2015 for \$50,000. The HPI for 2015-2019 stayed the same at +.03 for each year, which results in a cumulative percentage increase of .12. To calculate "fair return" one must multiply \$50,000 x 1.12 = \$56,000, plus documented improvements of \$4,000 would total \$60,000. The "fair return" to the seller would be the increase in value of \$60,000, minus the original investment of \$50,000 to equal a \$10,000 fair return. Capital improvements include but are not limited to: square footage added to a house's living space, wholesale replacement of heating, ventilation, and/or air conditioning systems, accessibility improvements such as bathroom modifications or ramps, or the construction of a permitted

accessory structure on the property.

HOME-assisted ownership properties that are subject to resale restrictions must also remain affordable to a reasonable range of low-income homebuyers. The City of Racine will annually calculate a maximum sale price based upon the amount that would be affordable to households earning between 70%-80% of area median income and paying not more than 30 percent of their annual income for principal, interest, property taxes, and insurance. The City of Racine may provide down payment or second mortgage assistance to sufficiently enhance affordability as needed.

3. A description of the guidelines for resale or recapture that ensures the affordability of units acquired with HOME funds? See 24 CFR 92.254(a)(4) are as follows:

The City may use HOME funds to assist the rehabilitation and construction of housing by non-profit and for-profit developers and CHDOs. In each case, the request for assistance will be reviewed in detail, including evaluation of other funding (not HOME) available for the project, and an underwriting analysis will be performed to ensure the development is not over-subsidized. When it is decided that assistance is necessary, the HOME assistance will be provided in the form of a loan. The terms of the loan will vary with the needs of the individual project and may include the length of the loan, interest rate (including zero interest), frequency of payment (including periods of deferred payment), and whether part of or the entire loan would be forgiven.

The applicable income and affordability restrictions will be recorded as a land-use restriction on the project property. The period of affordability as determined by 24 CFR 92.254(a)(4) will be a factor in determining the length of the loan. The loan will be recorded as a mortgage and promissory note on the property.

In the event of a voluntary or involuntary transfer of the property during the loan term, the City will recapture all or a portion of the HOME assistance provided to the project if recapture provisions apply. If the net proceeds from a voluntary or involuntary sale are insufficient to repay the amount of the HOME subsidy that is due, the City shall recapture the balance due on the loan or 100 percent of net proceeds from the sale, whichever is less. If there are no net proceeds from the sale, no repayment is required. "Net proceeds" is defined as the sales price minus superior loan repayment and any closing costs incurred in the sale.

Sale of all properties subject to resale restrictions must be made in accordance with HUD requirements specified at 24 CFR Part 92 and the City of Racine's resale provisions. The City of Racine may recoup all HOME-funded costs associated with the any sale of HOME-assisted property that did not occur in accordance with those regulations.

4. Plans for using HOME funds to refinance existing debt secured by multifamily housing that is

rehabilitated with HOME funds along with a description of the refinancing guidelines required that will be used under 24 CFR 92.206(b), are as follows:

n/a

# **Emergency Solutions Grant (ESG)** Reference 91.220(I)(4)

1. Include written standards for providing ESG assistance (may include as attachment)

The written standards are provided as an attachment to the Plan.

2. If the Continuum of Care has established centralized or coordinated assessment system that meets HUD requirements, describe that centralized or coordinated assessment system.

The CoC has implemented two stages of its Coordinated Intake and Prioritization system. The first stage involves all providers utilizing the same data collection form. The form collects the required HUD Uniform Data Elements as well as additional data identified by the CoC so that it can be used as a uniform intake form. The second stage was the implementation of prevention and diversion coordinated intake. All persons are referred to a single agency. Households who have presented at the shelter because they have been evicted are assessed to determine if they can return to the residence, or another residence temporarily while arrangements for housing can be made. Households who have received a termination of tenancy notice, but have not yet been evicted are assessed to determine if they have a legal defense to the eviction or if an agreement can be negotiated for the household to remain in the unit. The agency that is the single point of contact works with ESG financial services and mainstream providers when negotiating agreements involving rental assistance. Persons who have received a Sheriff's notice-meaning they have been evicted and the Sheriff will move them out of the residence if they don't voluntarily vacate-are prioritized in this system as they have the greatest need and likelihood of becoming homeless. Stage three will utilize IMPACT 211 as the single point of contact for all service components in the CoC. Persons needing prevention assistance can enter either through IMPACT 211 or directly through the current agency coordinating intake for those services. Stage four, which is the final stage, will be the use of VISPDAT and HMIS for housing prioritization for persons experiencing homelessness. This type of system will prioritize by the greatest need, rather than first in time.

3. Identify the process for making sub-awards and describe how the ESG allocation available to private nonprofit organizations (including community and faith-based organizations).

The CoC notifies the community of available funding using its website, community listservs, social media, and traditional media outlets. Current recipients of funds and other agencies interested in applying for funds notify the CoC of their interest in applying for funding. A needs assessment is done by the CoC annually. The results of the needs assessment and data are used to identify funding Annual Action Plan

priorities, which include both service component types and sub-population needs. The data utilized is generated from HMIS, as well as aggregate data reports submitted by victim services providers. Using this information the CoC holds a meeting to identify the needs, as well as the level of funding for each component. Agencies wishing to apply for funds indicate their interest in applying within specific categories.

A certification process has been implemented that each organization applying for funds must complete. The certification is a questionnaire consisting of questions about financial policies and procedures, audit and monitoring findings, conflict of interest policies, experience with HUD and other federal grants, and homeless participation on the agency board or policy-making body. The performance of current recipients wishing to apply for funds is also reviewed. A scoring tool, which utilizes data from HMIS to generate a numerical score is used for the performance evaluation. New applicants, as well as current recipients also complete an experience questionnaire that generates a numerical score.

Using this information, the CoC makes a decision as to which agencies should be funded and the final level of funding for each service component and agency. If an agency is not selected there is a right to appeal the decision to the City of Racine within a time frame that would allow an application to be submitted if the decision of the CoC is overturned. The selected agencies complete the consolidated application and it is submitted to the City of Racine. The application is then reviewed by the City of Racine.

The City of Racine may deviate from these procedures if immediate actions are needed to prevent, prepare for, and respond to coronavirus.

4. If the jurisdiction is unable to meet the homeless participation requirement in 24 CFR 576.405(a), the jurisdiction must specify its plan for reaching out to and consulting with homeless or formerly homeless individuals in considering policies and funding decisions regarding facilities and services funded under ESG.

The CoC has participation from both currently and formerly homeless individuals. All agencies receiving ESG funds are required by the CoC to have a current or formerly homeless person on their Board of Directors or a policy-making committee that decides program policies.

5. Describe performance standards for evaluating ESG.

The number of persons assisted, spending rate, and housing stability performance measure outcomes are utilized to evaluate ESG funded program delivery. Additionally, financial records and backup documentation are reviewed to assure financial compliance. Client files and HMIS data are also reviewed for compliance and performance.

Housing stability performance measures that are currently being utilized are as follows:

Annual Action Plan

Street Outreach: The number of households entering shelter or permanent housing is divided by the total number of households "engaged" by outreach to generate a percentage. A baseline, using data over a 2 year period would be used to identify performance markers. The CoC does not have any street outreach projects so a baseline does not exist at this time.

Shelter: The number of households exiting the shelter to a permanent housing destination is divided by the number of households in the shelter to generate a percentage. For ongoing projects, the percentages are compared to prior year percentages with an expectation that they should be the same or better than previous years. The percentages are also utilized to set a minimum expectation for new projects.

Prevention: The number of households remaining in permanent housing is divided by the number of households receiving prevention assistance to generate a percentage. Another method that is being used is to determine the percentage of households that do not enter the shelter at 6 and 12-month intervals after last receiving prevention assistance.

Rapid Re-housing: The number of households remaining in permanent housing for a period of 6 months or more is divided by the number of households entering rapid re-housing to generate a percentage. Another measure that is being used to determine the percentage of households that remain in permanent housing at 6 and 12-month intervals after last receiving rapid re-housing assistance.

For all HOME rental activities, beneficiaries include families that would qualify at no more than 60% Area Median Income according to the Part V income calculation method and are otherwise eligible per HOME and Federal regulations. For HOME homebuyer activities, eligible applicants include families earning no more than 80% of Area Median Income. Specific programs within each of these two subsets, such as TBRA or homebuyer down payment assistance, can target specific populations within these income groups, but must not deviate outside the income brackets identified or other HOME regulations as applicable. The City of Racine may consider applications from eligible owners, sponsors, developers, sub-recipients, and CHDOs to undertake any HOME rental or homebuyer activities.

The City of Racine typically releases HOME funds for rental programs or developments through a Notice of Funding Availability (NOFA) or Request For Proposals (RFP) process. HOME funds for homebuyer programs or homeownership development subsidies are also typically released via a NOFA or RFP, but direct homebuyer assistance may be distributed on a first-come-first-served basis to beneficiary homebuyers.

All information regarding applicable NOFAs or RFPs, or applications for direct assistance, will be available at the City of Racine NSD webpage:

Annual Action Plan 2022 https://www.cityofracine.org/CityDevelopment/NeighborhoodServices/

# **Attachments**

# **Citizen Participation Comments**

# \*\*\* Proof of Publication \*\*\*

STATE OF WISCONSIN )	PUBLIC NOTICE OF CONMENT PERIOD AND PUBLIC HEARING
SS. COUNTY OF RACINE )	ON FY 2022 ANNUAL ACTION PLAN On a stout Wednesday, July 20, 2022 the City of Racine, Wisconsin will file with the Wisconsin State Office of
being duly sworn, on eath says, that he she is one of the printers of THE JOURNAL TIMES, a daily newspaper printed and published in the City of Racine, County and State aforesaid, and that a notice, of which the annexed printed slip is a frue copy, has been published in the said JOURNAL TIMES for	the U.S. Department of Housing and Union Development (HUD) the City's 2022 Annual Action Plan (AAP). The AVP describes the City's proposed use ty fiscal year (FY) 2022 evalsible Factoral and other resources or address the printip needs and specific objectives in the FY 2020-2024 Consolidated Plan (Con Plan); the City's method for distributing funds to City departments and not-for-profit organizations; and the geographic organizations; and the geographic
the term of weeks, once each wask successively, commencing	assistance.  All interested parties are encouraged to review the draft plans and invited to
the 者 day of May, 2022, and ending	
May 30 , 2022.	centralities and senting a firm and control of senting a lefter to 730 Washington Avenue, Alin Evenden Seunden, Hadne, M Scholla. This public coment period will begin on Wednesday, June 1, 2022 and extend frough Spin on June 30, 2022. All comments med
	June 1, 2022 and extend through 5pm on June 30, 2022. All comments must be received by 5pm on Thursday, June
RACINE CITY - DIV OF NEIGHBORHOOD SERV	be received by 5pm on Thursday, June 30, 2022. Interested parties may also provide comments on the draft plans at
DEPT OF CITY DEVELOPMENT	provide comments on the draft plans at the public hearing on Wednesdey, June 15, 2022 of 6pm held at City Hell (730 Washington Ave. Racine, Wi
730 WASHINGTON AVE ROOM 132	\$3403). Notice of the meeting will be available at https://eityofracine.legi- star.com/Calendar.aspx
RACINE WI 53403	The AAP describes the use of funds stemming from the Community Devel- opment Block Grant (CDBG) program,
Subscribed and swom to before me this 30 day of 2022	opment Block Grant (CDBG) program, the HOME Investment Parimetrics; HOME) program, and Emergency Solutions Carant (ISSG) program. The 2022 CDBG allocation is \$1,894,293. The 3022 POME allocation is \$1,894,293. The 3022 POME allocation is \$1,894,293. The 3022 POME allocation is \$1,994,293. The 3022 ESS allocation is \$167,400. The GIP allocation participation with eggens to the start joins. A draft copy of the Xabit—will be available for in review on the vestule for the Department of GIP Development at https://dxydriscine.org/CIP/Development/NeighborhoodServices* during the commant period. For more information, please contact breaden sum-dering-chyofractine.org. or cell the Department at 202 635,9151. PUB: MAY 30, 2022
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Notary Public  My Compulsion Expires 10/27/2024	SHLEY
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# \*\*\* Proof of Publication \*\*\*

STATE OF WISCONSIN )
COUNTY OF RACINE )
being duly sworn, on gath says, the he/she is one of the printers of THE JOURNAL TIMES, a daily newspaper printed and published in the City of Racine, County an State aforesaid, and that a notice, of which the annexed printed sits a true copy, has been published in the said JOURNAL TIMES for
the term of <u>l</u> weeks, once each week successively, commend
the old day of <u>Jun C.</u> . 2022, and ending
June. 29, 2022
RACINE CITY DEVELOPMENT
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ANNUAL ACTION PLAN PUBLIC NEARING #2
PUBLIC NOTICE FOR PY 2022
On or shoul Wednesors, July 20.
2022the Chy of Racine Visconsin will file with the Visconsin State Office of the U.S. Department of Housing and Urban Development (HUD) the Chy a 2022 Annual Action Flan (AAP) element of Racine's 2102-2024 Consolidated Housing and Community Development Plan (too Plan) indusing annual goals and objectives for the Chy is feedingly funded housing and community development activities. The AAP describes the City's proposed use for Escal year 2022 available federal and other resources to address the pitchty heads and specific objectives in the Consolidated Plan: the City is method for distributing funds to dily departments and mol-tor-portil organizations; and the geographic awass of the City to which it will drest assistance.

All internaled parties are encouraged

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The CDY encourages public pericipefor with regards to the chart plans. A chart copy of the plans will be available for review on the website for the Department of CBy Development at high with prication and CDP pericipal menth legistration and CDP pericipal to command period. For maniferments, please cyribot box dansa, no der SCE profession and commentation of the Department at 282 838 9151.

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DEPT. OF CITY DEVELOPMENT CITY OF RACINE, WI

# LEGAL ACTION OF WISCONSIN

Providing free legal services to lew-income Wisconstr clients since 1968 • Proporcionando servicios legales granuitos a clientes de bajos ingreses en Wisconstr desac 1968

June 30, 2022

Mr. Brendan Saunders Racine City Hall 730 Washington Avenue Racine, WI 53403

Submitted Via Email: nsdapplications@cityofracine.org

The City of Racine 2022 Draft Annual Action Plan

Dear Mr. Saunders:

Legal Action of Wisconsin, Inc. submits this comment in favor of the City of Racine's 2022 Draft Annual Action plan. Legal Action of Wisconsin (LAW) is a civil legal aid organization with six offices across the 32 southeastern counties of Wisconsin, Our organization has an office in Racine, where we provide free legal services in housing, barriers to employment, consumer, public benefits, and family law cases to people who cannot afford an attorney. In the past, LAW has partnered with the city on a variety of projects, including using CDBG funds administered by the City to provide Racine residents with legal assistance in eviction and foreclosure cases.

Currently, Racine, like many cities across the United States, is facing a housing crisis. During the most recent Point in Time, the annual count of the unhoused people living in a community, there were 193 individuals identified as experiencing homelessness in Racine. This was up from the 145 individuals experiencing homelessness in 2021. Anecdotally, our staff have observed a significant uptick in the number of individuals who have been given notices to vacate or not had their leases renewed. Often this is so landlords can increase the rent on the property. If a landlord files an eviction action, that significantly limits where the tenant can move and increases the likelihood that tenant will experience some form of homelessness. Furthermore, we have seen many tenants living in substandard housing. Landlords are unwilling to make repairs when tenants complain, since there is little financial incentive for them to do so, and the stock of available housing, especially for low to moderate income families, is so limited. The result is that many of Racine's most vulnerable are currently living in substandard housing.

For those that own their home, foreclosure can also lead to housing instability. Although federal protections during the height of the COVID pandemic prevented foreclosure for many people, with those protections expiration, we are seeing more and more homeowners facing foreclosure. Beyond the harm to individuals, foreclosures cause neighborhood-wide harm, as foreclosed properties owned by lenders can sit vacant for years while the property is not properly maintained. This can decrease the value of the surrounding properties and lead to blight on a neighborhood-wide level.

245 Main Street Suite 202 Racine, WI 53403

Fax

Office 262,635,8836 262,635,8838 General 855,947,2529

www.legelection.org

funded in part by: LSC

Letter to: B. Saunders 06/30/2022 Page: 2

In addition, barriers to employment increase the likelihood that an individual will experience homelessness and housing instability. A suspended driver's license, a criminal record, or an unpaid ticket can all make it difficult for people to find and keep good paying jobs, leading to housing instability and an increased likelihood that someone will become homeless.

For these reasons, Legal Action supports the Draft of the City of Racine's 2022 Annual Action Plan, especially its decision to allocate 15% of the CDBG funds (the maximum allowed by HUD) to public services. By assisting individuals with eliminating barriers to employment, preventing foreclosure, preventing eviction, and addressing unhealthy living situations, Legal Action of Wisconsin has seen firsthand how intervention can improve the lives of the most vulnerable populations. We would encourage the City to ensure that the AAP includes all these types of work.

We further support the City's decision to prioritize those projects that address the racial inequities the City currently faces. The data shows that people of color living in Racine are at greater risk of housing instability and are more likely to face some type of barrier to employment. It is vital that the City prioritize work that addresses the barriers faced by these communities.

For all the reasons stated above, Legal Acton of Wisconsin, Inc., supports the City of Racine's 2022 Draft Annual Action Plan as it was submitted for comment.

Sincerely,

LEGAL ACTION OF WISCONSIN, INC.

Robert B. Held Vander Wyst

Managing Attorney - Racine Office

# **Grantee Unique Appendices**

#### City of Racine: 2022 Annual Plan Funding

2022 \$ 372,858 \$ 5 279,643 \$ 466,073 \$ 242,359 \$ 503,360 \$ 5 Pt \$105,003.57 \$ \$330,148.07 \$ \$330,148.07	\$105,608.57 \$338,148.07 \$2,108,044 70,493 \$ 140,986 \$ 352,465 \$ 140,986.00 \$ 704,930	CDBG		Admin	Rental Housing	Owner Housing	Public Services	Public Infrasructure	Economic Development	Code Enforcement	CHDOs	Blight Reduction		Total
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ESG	5	160,724	5	160,046	3	(678)
	5	2,638,623	5	2,729,269	5	90,646

# RACINE CoC Shelter Standards

Standards apply to all forms of shelter and supportive services unless indicated otherwise.

# Eligibility

Standard: The project will assist participants who meet the definition of homeless and other HUD eligibility requirements.

# 1 Eligibility

A participant must meet the HUD definition of homeless (HEARTH Act1 )at the time of project entry.

A participant shall not be denied shelter or terminated from shelter based on sobriety (alcohol or drug), criminal history, proof of citizenship, proof of residency, identification, disability, familial status, gender identification or other reasons prohibited by the Fair Housing Equal Opportunity Act. (Exceptions: A male may be excluded from a female only shelter, and a single male or female without an accompanying minor child may be excluded from a family with minor children shelter.)

A DV shelter may exclude persons who are not victims/survivors of domestic violence. A youth shelter may exclude persons who are not within the specified age groups for service. A mental health shelter may exclude persons who do not have a mental health diagnosis. A veteran only shelter may exclude persons who do not meet the shelter's definition of veteran.

# 2 Participant Intake

Standard: Participant eligibility for the project will be determined at intake. Eligible participants will be oriented on the project and their rights and responsibilities and enrolled in services if they choose to participate.

Intake includes

- 1. Eligibility: Determine eligibility for the project and enroll eligible participants
- Participant Data: Collect relevant personal information for all household members for program entry in HMIS
- Shelter Explanation: Explain the participant expectations, rights and responsibilities, tour the facility (if a shelter) and answer questions as needed.
- HMIS Release: Explain the HMIS system and have the participant sign an HMIS release according to his or her preferences.

Current as of 6.18.19

Annual Action Plan 2022

<sup>&</sup>lt;sup>1</sup> Federal Register Vol. 76 / No 233 / Monday December 5, 2011 / Rules and Regulations, p. 76014

- Termination Procedures: Explain the Termination and Grievance Procedures and have the participant sign them.
- Compliance with Sex Offender laws: All shelters will comply with laws regarding sex offenders.

# 3 Occupancy Standards

Standard: All physical shelter facilities shall meet minimum habitability standards.

All physical facilities shall comply with any State or local laws, as well as the standards set forth in the Emergency Solutions Grant.

# 4 Case Management

Standard: All participants shall receive case management designed to help the participant achieve housing stability and self-sufficiency.

A participant shall have initial contact with a case manager within 72 hours of entry into the shelter or program for services only projects, and shall receive regular case management.

A participant shall have an individualized case plan directed at housing stability and self sufficiency. Goals should be reasonable and attainable, and adjusted as needed.

A participant cannot be required to participate in mental health, alcohol or drug treatment as a condition of receiving case management or shelter.

A participant can be encouraged to save money but cannot be required to save money as a condition of receiving case management or shelter.

A participant cannot be terminated from shelter solely based on non-compliance with a case plan.

# 5 Participant Files and Documentation

Standard: Records documenting participant eligibility and participation in the project will be securely kept in participant files and HMIS.

# 5.1 Participant Files

Participant files will be kept in a locked filing cabinet or in a locked, secure office. At a minimum, each participant's file will contain:

- Updated File Check List
- Documentation of Eligibility at project entry (3<sup>rd</sup> Party Documentation, Homeless Verification Form)

- Statement of income or no income
- Signed expectations (rules)
- HMIS agreement signed by participant
- Termination procedures signed by the participant
- Signed Releases of Information
- Housing Search Plan
- Mainstream Resources (Checklist documenting mainstream resources accessed by the participant)
- HMIS Documentation
- Any other documentation required by the Emergency Solutions Grant.

The case manager will use case management and other functions in HMIS according to current HMIS standards. At a minimum, the case manager will document the following in HMIS:

- All participant data related to universal data elements and rapid rehousing HMIS requirements
- Case Notes for each meeting with the client
- Referrals to other agencies and services
- Housing Stability Case Plan
- Service Transactions (may be done by HMIS staff)

# 5.2 Monitoring

In the event that the project is monitored, the case manager will print case notes, case plans, and a screenshots of referrals to accompany any files selected by the monitoring officials for review.

# 6 Termination Procedure

Standard: All reasonable efforts will be made to avoid the termination of a participant. When termination is necessary for non-compliance, due process will be followed and participants will be given the right to appeal their termination.

# 6.1 Termination Procedures

All program participants have the right to be heard regarding complaints, or if they believe that they are not being treated fairly. Any participant who wishes to file a complaint or grievance may do so according to the *Grievance Procedure*. Mitigating circumstances shall be given great weight in making a decision to terminate a participant so that termination only occurs in the most serious cases.

Upon entering the shelter or supportive services project, participants will receive and sign a copy of the Grievance and Termination procedure. If the participant becomes non-compliant with the terms of the service agreement, efforts will first be made to contact the participant, discuss the cause of non-compliance, and restore compliance. Termination from shelter shall not be a consequence of non-compliance with a case management plan. Generally, termination from shelter should occur only in serious situations such as use of alcohol and drugs in the facility, threats of violence or violence in the shelter, or other behavior that is a serious threat to the health and safety of others or themselves.

At a minimum, a participant shall be provided notice of the expectations of the project, shall be provided written notice of the alleged violation including the date, time, names of witness and description of the behavior and expectation (rule) violated, shall be provided with a reasonable time to request a hearing on the matter, and shall be provided with a reasonable time to appeal the decision/consequence. All decisions must be in writing and must clearly state the reason for the determination, expectation violated and evidence relied on in making the decision.

The participant has the right to be accompanied by an advocate (e.g. coworker, friend, family member, etc.) at each step of the grievance process. The participant may also withdraw a complaint at any time.

#### 7 Grievance Procedure

Standard: The participant has the right to register a formal complaint regarding the project and will not be denied these services based upon such complaints. The Grievance Policy must be presented to participants at intake.

#### 7.1 Grievance Procedures

A participant has a right to register formal complaints regarding the services provided and will not be denied services based upon such complaints. The participant has the right to be accompanied by an advocate (e.g. coworker, friend, family member, etc.) at each step of the grievance process. The participant may also withdraw a complaint at any time.

This grievance procedure is intended to address issues specific to the provider/program and is not intended to address complaints regarding other agencies or programs.

#### Step 1: The Participant requests to file a grievance.

The participant expresses a concern or complaint and is provided a grievance form. The provider will explain each step of the procedure to the participant and assist in proper completion of the form. The completed form must be returned by the participant within 30 days of the incident. At each provider's discretion, late grievances may be considered.

#### Step 2: Case Manager Discussion

The grievance form shall be provided to the appropriate case manager within 5 business days of receipt from the client. The case manager will attempt to set up a face to face meeting to resolve the matter with the participant within 5 business days of receipt of the grievance.

The participant may have an advocate and/or the RRH provider present while meeting with the case manager.

If the participant is satisfied with the proposed resolution of the issue during the meeting, a document will be prepared stating the resolution and shall be signed by the participant and case manager.

If the Case Manager is unable to resolve the issue to the participant's satisfaction, the case manager's immediate supervisor shall review the matter. Follow the previous step for resolution, and if not resolved the matter may then be appealed to that person's supervisor up to the point of the Executive Director.

# If the Executive Director is unable to resolve the matter the grievance will be given to the Board of Directors.

A board committee will review the grievance on behalf of the Board of Directors and attempt to meet with the Participant. The Board of Directors will make a decision on the issue and provide their decision to the Participant in writing.

#### Step 5: The BOD of the Shelter provider directs an Appeal to the Lead Agency of the CoC.

The participant may appeal a decision of the Shelter provider BOD to the Lead Agency. Such appeal shall be heard by an ad hoc committee of at least 3 agencies representative of the CoC. The only issues to be considered are whether the Shelter provider complied with these standards, State EHH or City ESG contract depending on funding source, and Federal regulations for the HUD ESG program. If the Lead Agency is the shelter provider, the appeal shall be assigned to one of the other providers to form the committee of 3 agencies representative of the CoC, not including the Lead Agency.

# CURRENT AS OF 6/18/19

# RACINE CoC Rapid Rehousing Standards

# Eligibility

Standard: The project will assist participants who are literally homeless utilizing a "housing first" approach.

# 1.1 Eligibility Criteria

To be eligible for RRH assistance, a participant must be literally homeless according to the HEARTH Act<sup>1</sup> at the time of project entry. The definition used for determining eligibility is:

- 1) An individual or family who lacks a fixed, regular, and adequate nighttime residence, meaning:
  - An individual or family with a primary nighttime residence that is a public or private place not designed for or ordinarily used as a regular sleeping accommodation for human beings, including a car, park, abandoned buildings, bus or train station, airport or camping ground;
- An individual or family living in a supervised publicly or privately operated shelter designed to provide temporary living arrangements (including congregate shelters, transitional housing, and hotels and motels paid for by charitable organizations or by federal, state or local government programs for low income individuals); or
- An individual who is exiting an institution where he or she resided for 90 days or less and who
  resided in an emergency shelter or place not meant for human habitation immediately before
  entering that institution.

Employment, income, criminal history, eviction history, medical conditions, participation in specific programs, and other factors and services are not factors in determining eligibility. The RRH provider must comply with the Fair Housing Act and does not discriminate based on race, color, national origin, religion, sex, sexual orientation, disability, or presence of children.

RRH placements must comply with local law and a provider is unable to provide housing assistance to any individual whose residence in a particular unit is prohibited by local ordinances, statutes, zoning laws, or other.

#### 1.2 Re-Certification

An annual assessment will be conducted within 30 days of the 12 month anniversary of enrollment in the project and documented in HMIS. At the time of this assessment, eligibility will be re-evaluated based on the criteria established in 24 CFR 576.401 (b). To remain eligible, the participant's income must not exceed 30% of the area median income and the participant must lack sufficient resources and support networks necessary to retain housing without assistance.

Annual Action Plan 2022

<sup>&</sup>lt;sup>1</sup> Federal Register Vol. 76 / No 233 / Monday December 5, 2011 / Rules and Regulations, p. 76014

#### 2 Prioritization

Standard: The project will prioritize eligible participants based on needs and length of homelessness.

Providers will actively participate in the Coordinated Entry system used by the Continuum of Care for the City and County of Radine according to its standards and procedures. Project participants will be selected as prioritized for RRH by the COC, based on VI-SPDAT store and then length of time homeless. Both HMIS and non-HMIS housing prioritization lists will be consulted for the selection of each RRH participant.

# 3 Participant Intake

Standard: Participant eligibility for the project will be determined at intake, following selection through Coordinated Entry. Eligible participants will be oriented on the project and their rights and responsibilities and enrolled if they chaose to participate.

During intake, the Rapid Rehousing Case Manager will:

- 1. Eligibility: Determine eligibility for the project and enroll eligible participants.
- Participant Data: Collect relevant personal information for all household members for program entry in HMIS
- Program Explanation: Explain the project and provide the participant with a project summary.
- Service Agreement: Exploin the service agreement and have the participant sign a service agreement.
- HMIS Release: Explain the HMIS system and have the participant sign an HMIS release according to his or her preferences.
- 6. Termination Procedures: Explain the Termination and Grievance Procedures and have the participant sign them

# 4 Housing Search and Placement Services

Standard: The project will assist participants in locating safe, affordable housing that meets the participants' needs within ETH (ESG and HPP) guidelines.

#### 4.1 Participant Responsibility

It is the responsibility of the participant, with the assistance of the RRH provider, to identify a unit that meets FTH RRH Project requirements and sign a lease within 60 days of corollment. Failure to meet this requirement will result in the participant being exited from the project, but will not preclude the participant from being enrolled and receiving services again at a later date.

#### 4.2 Housing Unit Requirements

Prior to providing rental assistance, the RRH case manager will ensure that any unit selected by the participant meets the following criteria:

- Fair Market Rent: The unit does not exceed current HUD approved Fair Market rent as provided under 24 CFR part 88.
- Rent Reasonableness: The gross rent is determined to be reasonable for similar units in the area according to standards established under 24 CFR 982.507.
- Habitability Standards: The unit has passed a habitability standards hapedoon according to the standards described in 24 CHR 576.40% (c)<sup>1</sup>
- Lead Based Paint: The unit has passed a lead based paint inspection in compliance with 24 CFR 5.66 408/a<sup>1</sup>
- Rental Assistance Agreement: The landlord / property manager has signed a rental assistance
  agreement with the RRH provider.
- Lease: The landlord has executed a legally binding lease with the participant in accordance with 24.
   CFR 576.106 (g)<sup>1</sup>
- W9: The landlord has provided a W9 form for the project/s financial records.

#### 4.3 Housing Search and Placement Services

The case manager will assist the participant to develop a housing search plan. The case manager will assist in identifying available units, but it remains participant's responsibility to identify and select a unit that meets their needs and project requirements. The BRH Case Manager will:

- Identify potential housing planeaural barriers, such as criminal or eviction history
- Explore participant needs, such as accessibility, location, type of unit.
- Develop and document a housing search and placement plan, signed by the participant and case manager.
- Provide the participant with a "housing search letter" to provide to landlords that explains the
  project, confirms participation and provides information on the type of unit sought.
- Conduct habitability standards inspections of units identified by the participant as suitable and
  potentially eligible.
- Meet with potential landlords to discuss the project and complete required documentation

#### 5 Housing Services

Standard: The project will provide tenant based rental assistance and other housing services to assist participants to enter and maintain a suitable unit while enrolled.

# 5.1 Participant Requirements

The participant who is head of household must personally occupy any unit supported by RRH housing services. Is little to personally occupy the unit for any reason, including residence in an institutional facility, for a period of 90 consecutive days will result in termination from the project.

# 5.2 Security Deposit Assistance

The project may provide security deposit assistance for up to the equivalent of two month's rent per participant, payable to the landlord. Any remaining security deposits are returned by the landlord to the tenant in the event that the tenant leaves the unit after exiting the project.

# 5.3 Rent Payment Assistance

#### 5.3.1 Duration

The project may provide tenent beson control constance for a maximum of 12 months, payable to the landford as per the terms of a signed rental assistance agreement and within FMR and contressonableness requirements.

In the event that an individual leaves the program and re-enters it at a later date, the maximum assistance allowable is 24 months of rental assistance with n a 36 month period.

#### 5.3.2 Subsidy Guidelines

Participants will not be required to contribute towards their rent payment during the first 6 months of accupancy.

Starting with the seventh month of occupancy and any month thereafter, participants who have an income will be required to contribute 30% of their adjusted gross income towards their rent payment, payeble directly to the landlore. Adjusted income will be determined as per 24 CFR 5.609 and 24 CFR 5.611.

#### 5.4 Utility Payment Assistance

# 5.4.1 Utility Arrears Payment

The project may pay up to the equivalent of  $\epsilon$  months of arrears per participant as described in 24 CFR 576.105 (a)(5). One month's arrears will be considered the current monthly utility allowance for the participant's unit.

#### 5.4.2 Utility Payments

The project may pay utilities on behalf of project participants who have no income. Participants who have income are required to pay their own utilities.

# 6 Housing Stability Services

Standard: The Project will provide on-going Case management to assist each participant to maintain housing stability and exit the project into permanent housing.

# 6.1 Participant Requirement

Partic panes will be required to meet with their assigned case manager at least once per month from enrollment until they have exited the project.

#### 6.2 Housing Stability Plan

The case manager and participant will develop a browsing stability plan. The plan will determine the amount of income and other services needed to maintain housing stability after leaving the project. The plan will identify action steps to assist the participant in accessing resources that will result in housing stability and the participant exiting the project into permanent housing.

# 6.3 Housing Stability Case Management

The project will provide case management to assist the participant in achieving housing stability. Housing Stability case management may include:

- Referrals to mainstream services and other service providers.
- Applications to subsidized housing units and housing voucher programs.
- Mediation between the participant and landfords, property managers, or others who may
  influence the participand's housing stability
- Provision of information concerning apportunities, such as employment apportunities, educational apportunities, trainings and workshops, etc.

# 7 Eviction of Participant

# 7.1 Participant Requirement

Participants and experited to nomply with the terms of their lease agreement. In the event that a participant is evicted from his or her RRH-supported unit, the participant will have 60 days to identify and sign documentation for a new unit as per the standards for housing search and placement services.

# 7.2 Security Deposit

The project may pay a maximum of two months' scrucily deposit with ETH funding. In the event that a participant is evicted and has already received two months' security deposit assistance, it will be the participant's responsibility to pay for any additional security deposits. Failure to do so may result in being unable to enter a unit within 60 days and being exited from the project.

# 8 Participant Files and Documentation

Standard: Records documenting participant eligibility and participation in the project will be securely kept in participant files and HMIS.

#### 8.1 Participant Files

Participant files will be kept in a locked filing cabinet in a secure office. At a minimum, each participant's file will contain:

- Updated ('lle Check List)
- Documentation of Eligibility at project entry (3<sup>rd</sup> Party Documentation, Horncless Verification Form, or screenshot showing residence in Ferringency Shelfer)
- Documentation of Annual Re-Certification of Project Eligibility
- Declaration of Income signed by participant
- Documentation of selection through Coordinated Entry
- Service agreement signed by participant and case manager.
- HMIS agreement signed by participant.
- Termination procedures signed by the participant
- Signed Releases of Information
- Housing Search Plan
- Housing Search Letter signed by case manager
- Mainstream Resources Checklist documenting mainstream resources accessed by the participant
- Habitability inspection signed by case manager.
- Documentation of compliance with FMR
- Documentation of compliance with reasonableness.
- Rept Payment Assistance Agreement signed by case manager, landlord, participant and securities diserted.
- Copy of lease signed by landlord and participant.
- Copy of all payments made for Security Deposit Assistance, Rent Payment Assistance, Utility Payment or Agrees Payment Assistance
- Correspondence with the participant and/or landlord/property manager.

# 8.2 HMIS Documentation

The case manager will use case management and other functions in HMIS according to current HMIS standards. At a minimum, the case manager will document the following in HMIS:

- All participant data related to universal data elements and rapid rehousing HMIS requirements.
- Acceptance or Cancellation of Coordinated Entry Referrals and Service Associated with the Referrals
- Case Notes for eart; meeting with the client.
- Referrals to other agencies and services
- Housing Stability Case Plan

- Service Transactions, including
  - Rental Application Fee Payment Assistance
  - Deep Paymont Assistance ( (entered during the month for which the assistance was paid)
  - Hental Deposit Assistance.
  - 6 Utility Service Payment Assistance
  - c. Utility Arrearage Payment Plans
  - o Case / Care Management

#### 8.3 Monitoring

In the event that the project is monitored, the case manager will print case notes, case plans, and a screenshots of referrals to accompany any files selected by the monitoring officials for review.

# 9 Termination Procedure

Standard: All reasonable efforts will be made to avoid the termination of a participant. When termination is necessary for non-compliance, due process will be followed and participants will be given the right to appeal their termination.

#### 9.1 Termination Procedures

All program participants have the right to be heard regarding complaints, or if they believe that they are not being treated fairly. Any Rapid Rehousing participant who wishes to file a complaint or greenee may do so according to the *Greenee Procedure*.

Upon entering the Rapio Rehousing Program, participant's will incrive and sign a service agreement that outlines the requirements of the program. If the participant becomes non-compliant with the terms of the service agreement, efforts will first be made to contact the participant, discuss the cause of non-compliance, and restore compliance. If the participant continues to be non-compliant with program requirements, the RRH provider reserves the right to terminate rental assistance and other assistance according to the following procedure:

- 1.) The participant shall be informed in writing that he/sho is non-compliant with the service agreement and given a period of 15 days to restore compliance. The participant will be informed in writing that failure to restore compliance in that period shall result in termination of rental assistance.
- 2.) In the event that compliance is not restored, the portrapant shall be informed in writing that assistance is being terminated on a date given and provided with an explanation for the termination. The participant will be given at least 15 days to appeal the decision to the executive director of the EKH provider. If an appeal is made, the participant will receive written notice of the final decision made regarding the termination.

Termination does not preclude the participant from accessing services from the RRH provider at a later date.

#### 10 Grievance Procedure

Standard: The participant has the right to register a formal complaint regarding Rapid Rehousing services and will not be denied these services based upon such complaints. The Grievance Policy must be presented to participants at intake.

#### 10.1 Grievance Procedures

This Crievance Procedure is applicable to the RRH provider. A participant in any of those programs has a right to register formal complaints regarding the services provided and will not be denied services based upon such complaints. The participant has the right to be accompanied by an advocate (e.g. coworker, frund, family member, etc.) at each step of the grievance process. The participant may also withdraw a complaint at any time.

This griowance procedure is intended to address issues specific to the RRH providor/program and is not intended to address complaints lodged by one participant in reference to another participant's issues; neither is it expected to address complaints regarding other agencies or programs.

#### Step 1: The Participant requests to file a griovance related to the Rapid Rehousing Program.

The participant expresses a concern or complaint and is directed to the RRH provider to ubtain a Concern Form. The RRH provider will explain each step of the procedure to the participant and assist in proper completion of the Concern Form. The completed form must be returned to the RRH provider by the participant within 30 days of the incident.

#### Step 2: The RRH provider directs the Concern Form to the case manager

The RRH provider will review the form for completeness and time/lness and submit it to the appropriate case manager within 5 business days of receipt from the client. Late or incomplete forms will not be accepted. The case manager will attempt to set up a face to face meeting to resolve the matter with the participant within 5 business days of receipt of the Concern Form from the RRH provider.

The participant may have an advocate and/or the RRH provider present while meeting with the case manager.

If the participant is satisfied with the proposed resolution of the issue during the meeting, he or she will sign on the Concern Form indicated so and the issue will be closed.

If the Case Manager is qualified to resolve the issue to the participant's satisfaction, he or she may ask tho RR I provided to present the concern to the Executive Director within 5 working days of the meeting with the Case Manager (Step 3).

# Step 3: The RRH provider directs to Concern Form to the Executive Director

The Executive Director will review the Concern Form and then meet with the Participant without the Case Manager present within 5 working days of receiving the Concern Form.

If the Executive Director is able to resolve the matter, the Participant will sign the Concern Form indicating satisfaction and closing the issue.

If the Executive Director is unable to resolve the matter to the satisfaction of the Participant, the Participant may ask the RRH provider representative to direct the Concern Form to the Board of Directors of the RRH provider representative.

# Step 4: The RRH provider representative directs the Concern Form to the Board of Directors

A board committee will review the Concern Form on behalf of the Board of Directors and attempt to meet with the Participant. The Board of Directors will make a decision on the issue or concern within 15 working days of receiving the Concern Form, and provide their decision to the Participant in writing.

#### Step 5: The BOD of the RRH provider directs an Appeal to the Lead Agency for the funding source.

The participant may appeal a decision of the RRH provider BOD to the Lead Agency for the funding source. Such appeal shall be heard by an ad hoc committee of at least 3 CoC members. The only issues to be considered by the CoC are whether the RRH provider complied with these standards and Federal regulations for the HUD ESG program.

#### 1. PREVENTION

Homelessness prevention assistance includes rental assistance and housing relocation and stabilization services necessary to prevent an individual or family from moving into an emergency shelter, the streets, or a place not meant for human habitation.

#### ELIGIBILITY CRITERIA

- Participants must meet one of the following categories of HUD's Homeless Definition under CFR §576.2, AND have an annual income below 30% of the county median income:
  - Category 2\* (Imminent Risk of Homelessness)
  - Category 3 (Homeless Under Other Federal Statutes)
  - Category 4\* (Fleeing/Attempting to Flee Violence, and not living in a place described in Category 1)

\*Category 2 and category 4 participants must have no other residence AND lack the resources and support networks to obtain other permanent housing.

OR

Individuals and families who do not meet the definition of "homeless" under any of the categories established in the HUD Homeless Definition final rule, and are "at risk of homelessness" under the McKinney-Vento Act, may receive homeless prevention assistance.

- Participants must meet one of the three categories of HUD's At Risk of Homelessness Definition under CFR §576.2, AND have an annual income below 30% of county median income:
  - o Category 1\*
  - Category 2 (Children/youth who do not qualify as homeless under the homeless definition in §576.2 but qualify as homeless under another Federal statute)
  - Category 3 (Children/youth and their families who do not qualify as homeless under the homeless definition in §576.2, but who do qualify as homeless under Section 725(2) of the McKinney-Vento Homeless Assistance Act)

\*Category 1 participants must lack sufficient resources or support networks immediately available to prevent them from moving to an emergency shelter or another place described in Category 1 of the homeless definition.

#### PARTICIPANT PRIORITIZATION REQUIREMENTS FOR FINANCIAL ASSISTANCE

 All individuals and families must meet the minimum HUD requirements for eligibility for homeless prevention. Further, all participants must meet one of the following:

- Experienced homelessness in an emergency shelter, safe haven or place not meant for habitation within the past five years; or
- 2. Have a household of five or more; or
- 3. Live in or need an accessible housing unit; or
- 4. Live in subsidized unit; or
- 5. Have a criminal background; or
- 6. Have prior eviction
- The RACINE COC will use a shared prioritization screening and scoring tool available in HMIS(below) that will target participants with the most barriers to housing. This tool will be used for individuals and households that meet the initial eligibility requirements listed above.
- Participants with the highest score at the end of an agency's intake period will be prioritized to receive financial assistance.

#### PRIORITIZATION SCORING TOOL

For all participants who have experienced homelessness in an emergency shelter, safe haven or place not meant for habitation within the past five years, have a household of five or more, or live in or need an accessible unit, live in subsidized unit, have a criminal background, or have prior evictions:

Barrier	Scoring	Participant Score
Eviction history in last two years	1 point	
Currently lives in subsidized housing	1 point	
Currently lives in or needs an accessible unit	1 point	
Large family of five or more	1 point	
Criminal history	1 point	
Attempting to flee current domestic violence	1 point	
Experienced homelessness in Emergency Shelter, Safe Haven, or place not meant for human habitation in last 5 years	1 point	
	Total Score	

#### MINIMUM STANDARDS FOR FINANCIAL ASSISTANCE

- Financial assistance includes the following: rental application fees, security deposits, last month's rent, utility deposits and moving costs.
- The costs of homelessness prevention are only eligible to the extent that the assistance is necessary to help the program participant regain stability in the program participant's current permanent housing or move into other permanent housing and achieve stability in that housing.
- Eligibility and types/amounts of assistance must be re-evaluated not less than once every 3 months. At a minimum, each re-evaluation must establish and document:
  - The program participant does not have an annual income that exceeds 30% of county median income.
  - The program participant lacks sufficient resources and support networks necessary to retain housing without prevention assistance.
- Programs may require program participants receiving assistance or services to provide notification regarding changes to household income, household composition, or other circumstances that may impact need for assistance.
- Financial assistance will be distributed in a way to ensure that programs have funds available throughout the grant period.
- Programs must use the Racine CoC Coordinated Entry Prevention Assessment tools to determine the duration and amount of assistance. The tools do not dictate the amount of assistance that each household receives, but guides the case manager and client to determine the appropriate amount of assistance for each household.
  - All clients are assessed to determine initial need and create a budget to outline planned need for assistance.
  - Agencies cannot set organizational maximums or minimums but must rely on the CoC wide tools to determine household need.
  - Through case management, client files are reviewed monthly to ensure that planned expenditures for the month validate financial assistance request.
  - The RACINE COC expects that households will receive the minimum amount of assistance necessary to stabilize in housing.
- 7. Participant share will be determined by use of common assessment and budgeting tools approved through the RACINE COC. These tools will determine the monthly assistance amount and participant contribution. Participants will work with their case manager to develop their individual housing plan based on participant goals and shared goals for achieving housing stability. Case managers will use the housing plan to determine the participant contribution based on monthly income. Participants are expected to contribute a portion of their income based on budgeting to ensure housing stability. Financial assistance is available for households with zero income.

#### MINIMUM STANDARDS FOR HOUSING RELOCATION AND STABILIZATION SERVICES

 Housing Relocation and Stabilization Services include the following: housing search and placement, housing stability case management, mediation, legal services, and credit repair.

- The costs of homelessness prevention are only eligible to the extent that the assistance is necessary to help the program participant regain stability in the program participant's current permanent housing or move into other permanent housing and achieve stability in that housing.
- Eligibility and types/amounts of assistance must be re-evaluated not less than once every 3 months. At a minimum, each re-evaluation must establish and document:
  - The program participant does not have an annual income that exceeds 30% of county median income.
  - The program participant lacks sufficient resources and support networks necessary to retain housing without prevention assistance.
- Programs may require program participants receiving assistance or services to provide notification regarding changes to household income, household composition, or other circumstances that may impact need for assistance.
- 5. Homelessness prevention participants receiving more than one-time assistance, must have an initial home visit when first approved for assistance and subsequent house visits with each recertification every three months. It is expected that case managers will conduct office visits with homelessness prevention participants between home visits, at least once per month. Case managers and program managers are encouraged to provide more than the minimum required services through case management.

#### APPEAL

Any agency or person wishing to appeal action or inaction under these standards should first attempt to resolve the situation using the grievance policies and procedures of the individual agency. If further appeal is desired, a request can be to the Lead Agency for the grant within 30 days of the last action taken at agency level. The Lead Agency will convene an appeal committee of at least 3 agencies to hear the appeal.

# **Grantee SF-424's and Certification(s)**

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#### ASSURANCES - CONSTRUCTION PROGRAMS.

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PLEASE DO NOT RETURN YOUR COMPLÉTED FORM TO THE OFFICE OF MANAGEMENT AND BUDGET, SEND IT TO THE ADDRESS PROVIDED BY THE SPONSORING AGENCY.

NC : Certain of these sesurances may not be applicable to your project or program. If you have questions, please contact the Awarding Agency. Further, certain Federal assustance awarding agencies may require applicants to certify to additional assurances. If such is the case, you will be notified.

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- 10 Will comply with all Federal statutes relating to nondiscrimination. Those include but are not limited us. (a). Title VI of the Civil Rights Act of 1964 (P.1., 88-352). which crofill to discrimination on the basis of rage color or national origin (e) Title, X of the Education Amordments of 1972, salamended (20 U.S.C. §§1681) 1565, and 1545-1666), which problets discrimination or the pasts of sex; (c) Section 504 of the Renapilitation Action 1973, as unimediad (29) II,S C. § (514) without prohibits discrimination on the cas's of handicaps; (d) the Aga Risonmination Act of 1975, as amended (42 U.S.C. §§6101-5107), which problems clisor mine; on on the basis or ago. (a) the Drug Ascee Office and Treatment Act of 1972 (P. 1, 45-255), as amonoed relating to hund softmittation on the basis of onig abuse. (f) the Comprehensive Alcoho, Abuse and Alcaholism Provencien, Treatment and Rehabilitation Act of 1970 (P.J. 91-818), as amended, relating to name scrimination on the basis of algonic abuse  $\alpha_1$  a coherent (by) §8523 and 527 after Public Health Service Ast of 1912 (42 U.S.C. §§230 nd 3 and 950 op as amended, resulting to confidentiality of a cohol. and drug acust patient records (h) Tibe Villefille. Givil Rights Acr of 1868 (42 U.S.O. §§3601 et sec.) as amended, relating to nondiscrimination in the sale rental or final ding of holising; (i) any other riona sor mination provisions in the Apother statue(s). Under which application for Federal assistance is being made; and (i) the requirements of any other none sermination statue(a) which may apply to the application

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- 11. Will comply, or has already complied, with the requirements of Titles II and III of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (P.L. 91-548) which provide for fair and equitable treatment of persons displaced or whose property is acquired as a result of Foderal and federally-assisted programs. These requirements apply to all interests in real property acquired for project purposes regardless of Federal participation in purchases.
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- Federal acrors to State (Clean Air) implementation in the Section 175(c) of the Clean Air Acror 1955, as amended (42 U.S.C. §§7401 or seq.); (g) protection of underground sources of drinking water under the Safe Drinking Water Act of 1974, as amended (P.L. §§523); and, (t) protection of underground sources. Act of 1974, as amended (P.L. §§523); and, (t) protection of endangered species under the full angread Species Act of 1973, as amended (P.L. §§5-255).
- (ii) Will one ply with the Wills and Scenic Rivers Act of 1988 (16 U.S.C. 6§1271 et sagl) relates to protocting con panerts or accential commonents of the national wild and scenic fivers system.
- Will ses at the awarding agency in sesuring compliance with Section 108 of the National Historic Preservation Act of 1886, 98 amonded (16 U.S.C. §470). P.O. 11593 (identifice ion and emission or historic properties), and the Archaeological and Historic Preservation Act of 1974 (16 It.S.C. §54885-1 of seq).
- Mri: cause 10 be conformed the required financyal and compliance audits in accordance with the Single Audit Act Amendments of 1996 and OMB Circular No. A-133, "Audits of States, Local Governments, and Non-Profit Organizations."
- Will comply with all applicable requirements of all off er Fode at lows, exert," we orders, regulations, and policite governing this program.
- 20. Will cominly with the requirements of Section 106(g) of the Traincking Viction's Protection Act (TVPA) is 2000, as ann. 1360 (12 U.S.U. 7.04) which prohibits grant award recipients or a sub-recipient from (1) Engaging in severe forms of trafficeing in persons during the period of time that the award is in effect (2) Produit glac commercial six; su, during the period of the that the award is in effect (2) Produit glac commercial six; su, during the period of the End the award is in effect of (3) Using finded labor to the periodnal period the award of subcoverds under the award.

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PLEASE DO NOT RETURN YOUR COMPLETED FORM TO THE OFFICE OF MANAGEMENT AND BUDGET, SEND IT TO THE ADDRESS PROVIDED BY THE SPONSORING AGENCY.

NCTE. Certain of these assurances may not be applicable to your project or program. If you have questions, please contact the Awarding Agency. Further, certain Federal assistance awarding agencies may require applicants to certify to additional assurances. If such tailthe have you will be not fied.

As the duly authorized rapresentative of the applicant, I certify that the applicant

- Has the leget authority to coply for Pederal assistance and the institutione impropertial and Incardial copability (and/or agricultures sufficiently pay the non-Federal share of project costs) to ensure propor planning menagement and completion of project costance. In this application.
- Wiriging the swarping agency, the Computation General of the United States and it appropriate the State the right to examine all records, banks, pagers, or documents related to the less stance and will catablish a proper secondary system. It appropriate with generally accomposite accounting standards or agency threatives.
- 9. Will not dispose or, modify the use of, or phange the terms of the real property tod or other inforced in the able and facilities without permission and instructions from the lawsiding agency. Will record the Technoliswarding agency directives and will include a covenant in the title of roal property aggured in whole or hipparty with Technolisms, assistance funds to assist minority practicalisms that the assistance for the property practical field for the original.
- 4 (All comply with the requirements of the assistance awarding agency with regard to the artiflety, review and approval of construction plans and specifications.
- Will provide and maintain component and adoptate originating at pervision at the construction is tested on sure that the compliant work or some that the compliant work or some with the properties and specifications and fill it miss properties reports and such other minimalities as may be required by the assistance awarding agency on Sagre.
- Will hitlete and complete the work within the applicable time frame alter receipt of approval of the owereing agency.
- Will establish safeguards to prohibit employees from using the ploadone for a dupuse trial constitutes of presents the appearance of personal or eigenizational conflict of interest or personal gain.

- Will comply with the intergreenmental Personnel Act of 1870 (42 U.S.C. §§4774-4763) relating to prescribed star lands of mell systems for programs fundant underlong of the 19 statutes or regulations specified in Appendix A of CPM's Standards for a Merit System of Personnel Acministration (5.C.F.R. 000, Supposit F.)
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- 1. Will comply, or has already complied, with the requirements of Titles II and III of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (P.L. 91-845) which provide for fair and equitable treatment of persons displaced or whose property is acquired as a result of Federal and federally-assisted programs. These requirements apply to all interests in real property acquired for project purposes regardless of Federal perticipation in purchases.
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- Will comply, as applicable, with the provisions of the Davis-Bacon Act (40 U.S.C. §§275e to 275e-7), the Copeland Act (40 U.S.C. §275e and 18 U.S.C. §874), and the Contract Work Hours and Safety Standards Act (40 U.S.C. §§327-333) regarding labor standards for federally-assisted construction subagreements.
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- Federal actions to State (Clean Air) implementation Plants under Section 178(c) of the Clean Air Act of 1955, as amended (42 U.S.C. §57401 et seq.); (g) protection of underground sources of drinking water under the Safe Drinking Water Act of 1974, as amended (P.L. 93-523), and, (h) protection of andangered species under the Endangered Species Act of 1973, as amended (P.L. 93-205).
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- Will assist the awarding agency in assuring compliance with Section 106 of the National Historic Preservation Act of 1968, as amended (16 U.S.C. §470), EO 11593 (identification and protection of historic properties), and the Archaeological and Historic Preservation Act of 1974 (16 U.S.C. §§469a-1 et soc).
- Will cause to be performed the required financial and compliance audits in accordance with the Single Audit Act Amondments of 1986 and OMB Circular No. A-133, "Audits of States, Local Governments, and Non-Profit Organizations."
- Will comply with all applicable requirer ents of all other Federal laws, executive orders, regulations and pulldies governing this program.
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Public reporting outder for this collection of information is estimated to overage its minutes per resource including time for reviewing instructions, searching oxiding data sources, genering and maintaining the detained data decreased and competing and reviewing the collection of information. Serio comments regarding the border estimate or any other aspect of this collection of information inducing suggestions for adulting this burder to the Office of Managoriant and Budget, Passervink Radiichan Project (1348-5042), Washington, DC 29535.

PLEASE DO NOT RETURN YOUR COMPLETED FORM TO THE OFFICE OF MANAGEMENT AND BUDGET, SEND IT TO THE ADDRESS PROVIDED BY THE SPONSORING AGENCY.

NOTE: Certain of these assurances may not be applicable to your project or program. If you have questions, please contact the Available Agency Further, certain Faceral assistance awarding agencies may require applicants to certify to additional sesurances. If such is the case, you will be uptified.

As the puly authorized representative of the spollpert, I cent fy than the applicant.

- Hus the logal authomy to apply for Teperal assistance and the institutions internage fall and financial capacitity (including foods sufficient to day the non-frederal share of project costs) to ensure proper planning, management and convention of project described in this application.
- Will give the aparting agency, the Compituiter General
  of the United States and, if capropriets the State,
  the right to evernite all records, cooks, papers, or
  countents rosated to the sectionize and wall establish
  a broken accounting system in accordance with
  generally accepted accounting standards or agency
  directives.
- 3. Will not dispose of impolify the use of prioriting the forms of the real property like printher interest in the site and facilities without permission and instructions from the awarding approxy. Will record the Federal laws ding agency directives and will include a coverant in the title of real property acquired in whole or in cart with hodoral assistance for its secure non-position from the project.
- Will comply with the cognite phase of the resistance awarding agency with regard to the drafting, review and approval of construction plans and specifications.
- 5. Will provide and maintain competent and accounts engineeting supervision at the construction site to or auto-that the complete work conforms will the apartword parts and specifications and will furnish progressive reports and such order internation as may be required by the \$68,60 and a wording agency or Stare.
- 5 Will initiate and complete the work within the applicable time frame after receipt of approval of the awarding agency.
- Will establish sareguente to provide temployogs nom using their positions for eliptropee the constitutes or presents the appropriation of personal or organizational double, all interest, or personal gain.

- Will comply with the lowegovernmental Proporties Act of 1970 (42 II S.U. §§47284 755) relating to organized attacked of month systems for programs funded under one of the 15 sectors among Jebons suedified in Apparais A of OPM's Standards for a Month System of Personnel Administration (5 C.F.R. B.U. Subpart 4).
- 9 Will comply with the Lead-Based Paint Poisoning Prevention Act (42.1. 8.0) ggset(" et eq.), which profit to the use of lead copped point in construction or renabilitation of neglectus structures.
- Will comply with all Pedoral statutes relating to nondecilination. These include out are not limited to, (a) Title VI of the Civil Righls Act of 1964 (P.L. 88-352). which connects a sprimitivation on the basis of race. color or national ong n. (s) Title IX of the Education Amendments of 1872, as amended (20 U.S.C. §§188) file), and 1885-1888), which prompts discrimination on the basis of sext (or Section 504 of the Rehabilitation Act of 1973, as amended (29) 4,8 C. §794), which emailths discrimination on the casis of hand cads. (d) the Ago Discrimination Act of 1975, esamended (42 di.S.C. §§<101-000)), which prohibits discrimination on the casis of age; (a) the their Abuse Office and Treatment Act of 1972 (P.L. 97-266), as arrier ded retailing to conditionin nation on the basis of drug abuse, (filtho Comprononsive Alpahol Apuse and Algoholish Prevention, Treatment and Rehabilitation Act of 1970 (P.L. 91-616), as amonded relating to nondiscrimination on the basis of alsohol abuse on alcohalism (g) §§523 sou 527 of the Puello Health Service Amint 1917 (42 JUS.C. §6290 cm 3 and J90 bo as amorded, relating to confidentiality of closhel. and a uglacosa patient records in) Title VIII of the Civil Rights Acr of 18dit (42 L.8.C. §93601 et eed.) last emended relating to nondiscrimination in the sale mittal or financing of housing; (i) any other nondiscrimination provisions in the appoint statue(s). under which application for Federal assistance is being made, and (j) the requirements of any other andiscrimination activo(s) which may apply to the application.

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Standard Form 424D (Rev. 4 e.A. Prescribed by OWA Cirty Jan A402)

- 11. Will comply, or has already compiled, with the requirements of Tides II and III of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (P.L. 91-846) which provide for fair and equitable treatment of persons displaced or whose property is acquired as a result of Federal and federally-assisted programs. These requirements apply to all interests in real property acquired for project purposes regardless of Federal participation in purchases.
- 12. Will comply with the provisions of the Hatch Act (5 U.S.t.: §§1501-1508 and 7324/7328) which first the political activities of employees whose principal employment activities are funded in whole or in part with Federal funds.
- Will comply, as applicable, with the provisions of the Davis-Bacon Act (40 U.S.C. §§276a to 276a-7), the Copeland Act (40 U.S.C. §276c and 18 U.S.C. §874), and the Contract Work Hours and Safety Standards Act (40 U.S.C. §§327-333) regarding labor standards for federally-assisted construction subagreements.
- 14. Will comply with flood insurance purchase requirements of Section 102(a) of the Flood Disaster Protection Act of 1973 (P.L. 93-234) which requires recipients in a special flood hazard area to participate in the program and to purchase flood insurance if the total cost of insurable construction and acquisition is \$10,000 or more.
- 12. Will comply with entyremental standards which may be phescribed pursuant to the following. (a) institution of environmental quality control measures under the National Environmental Policy Act of 1989 (P.L. 91-190) and Executive Order (EO) 11514; (b) notification of violating facilities pursuant to EO 11798; (c) protection of wetlands pursuant to EO 11990; (d) evaluation of flood hazards in floodplains in accordance with EO 11988; (e) assurance of project consistency with the approved State management program developed under the Coastal Zone Management Act of 1972 (18 U.S.C. §§1451 et seq.); (f) conformity of

- Federal actions to State (Clean Air) implementation Plans under Section 176(c) of the Clean Air Act of 1955, as amended (42 U.S.C. §§7401 et seq.); (g) protection of underground sources of dinking water under the Safe Drinking Water Act of 1974, as amended (P.L. 93-523); and, (h) protection of ondangered species under the Engangered Species Act of 1973, as amended (P.L. 93-205).
- 16 Will comply with the Wild and Scenic Rivers Act of 1968 (16 U.S.C. §§1271 et seq.) related to protecting components or potential components of the national wild and scenic rivers system.
- Will assist the awarding agency in assuring compliance with Section 108 of the National Historic Preservation Act of 1966, as amended (16 U.S.C. §470). EO 11593 (identification and protection of historic properties), and the Archaeological and Historic Preservation Act of 1974 (16 U.S.C. §§469a-1 et seq).
- Will cause to be performed the required financial and compliance sudits in accordance with the Single Audit Act Amendments of 1996 and OMB Circular No. A-133 "Audits of States, Local Governments, and Non-Profit Organizations."
- Will comply with all applicable requirements or all other Federal laws, executive artists regulations, and policies governing this program.
- 20. Will comply with the requirements of Section 105(g) of the Trafficking Victims Protection Act (TVPA) of 2000, as amended (22 U.S.C. 7104) which prohibits grant award recipients or a sub-recipient from (1) Engaging in severe forms of trafficking in persons during the period of time that the award is in effect (2) Procuring a commercial sex act during the period of time that the award is in effect or (3) Using forced labor in the performance of the award or subawards under the award.

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City of Racing	C8:08:2322

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#### CERTIFICATIONS.

In accordance with the applicable statutes and the regulations governing the consolidated plan regulations, the jurisdiction certifies that:

Affirmatively Further Fair Housing -The jurisdiction will affirmatively further fair housing.

Uniform Relocation Act and Anti-displacement and Relocation Plan – It will comply with the acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended, (42, U.S.C. 4601-4655) and implementing regulations at 49 CLR Part 24. It has in offical and is following a residential anti-displacement and relocation assistance plan required under 24 UFR Part 42 in connection with any activity assisted with funding under the Countrium Development Block Grant or HOME programs.

Anti-Lobbying .- To the best of the jurisdictions knowledge and belief:

- 1. No Federal appropriated finds have been paid or will be paid, by or or, behalf of it, to any person for influencing or attempting to influence an officer or employed of any agency, a Member of Congress, an officer or employed of Congress, or an employed of a Member of Congress is connection with the awarding of any Federal contract, the making of any Federal loan, the entering into of any cooperative agreement, and the extension, continuation, renewal, amendment, or modification of any Federal contract, grant, loan, or cooperative agreement.
- 2. If any funds ofter than Federal appropriated funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an en ployee of a Member of Congress in connection with this Federal contract, grant, him, or cooperative agreement, it will complete and second Scandard Form-LLE, "Disclosure from to Report Lobbying," in accordance with its instructions; and
- If will require that the language of paragraph —and 7 or this anti-lobbying certification be included in the award documents for all subawards at all tiers fincluding subcontracts, subgrants, and contracts under grants, loans, and conpetitive agreements) and that all subrecipients shall certify and disclose accordingly.

Authority of Jurisdiction—The consolidated plan is authorized under State and local law (as applicable), and the jurisdiction possesses the legal authority to carry out the programs for which it is seeking funding, in accordance with applicable HEID regulations.

Consistency with plan --The housing activities to be undertaken with Community Development Block Grant, HOWE, Impergency Solutions Grant, and Housing Opportunities for Persons With AIDS funds accounsistent with the strategic plan in the furisdiction's consolidated plan.

Section 3 - 15 will comply with section 3 of the Housing and Urban Development Act of 1968 (12–0.8. $\bigcirc$  1701 $\alpha$ ) and implementing regulations at 24 CFR Part 78.

Signature of Authorized Official

08/08/2022

Date

Mayor

Title

# Specific Community Development Block Grant Certifications

The Entitlement Community conflies that.

Citizen Participation — is in full compliance and following a detailed citizen participation plan that satisfies the requirements of 34 CFR 91.105.

Community Development Plan — Its consolidated plan identifies community development and housing needs and specifies both short-term and long-term community development objectives that that have been developed in accordance with the primary objective of the CDBG program (i.e., the development of viable urban communities, by providing decent housing and expanding economic opportunities, primarily for persons of low and moderate income) and requirements of 24 CFR Parts 91 and 570.

Following a Plan -- It is following a current consolidated plan that has been accrossed by 1000

Use of Funds - If has complied with the following criteria:

- L. Maximum Feasible Priority. With respect to activities expected to be usested with CDBG funds, it has developed its Action Plan so as to give maximum feasible priority to activities which benefit less and moderate income Emilies or aid in the prevention or elimination of alums or blight. The Action Plan may also include CDBG-assisted activities which the grantee certifies are designed to meet offer community development needs having particular urgency because existing conditions nose a serious and immediate threat to the health or welfare of the community, and other timancial resources are not available (see Options' CDBG Certification).
- 2. Overall Benefit. The aggregate use of CDBG funds, including Section 108 guaranteed loans, during program year(s) 2022 [a period specified by the grantee of one, two, or three specific consecutive program years], shall principally benefit persons of low and moderate income in a manner that ensures that at least 70 percent of the amount is expended for activities that benefit such persons during the designated period.
- 3. Special Assessments. It will not attempt to recover any capital costs of public improvements assisted with CDBG funds, including Section 108 loan guaranteed funds, by assessing any amount against properties owned and occupied by persons of low and moderate income, including any fee charged or assessment made as a condition of obtaining access to such public improvements.

However, if CDBG durks are used to pay the proportion of a fee or assessment that relains to the capital crists of public arravevements (assisted in part with CDBG runds) financed from other revenue sources, an assessment or charge may be made against the property with respect to the public improvements direnced by a source other man CDBG finite.

In addition, in the case of properties owned and occupied by moderate-income (not low-income) fam! ies, an essessment or charge may be made against the property for public improvements financed by a source other than CDBG funds if the jurisdiction certifies that it lacks CDBG funds to cover the assessment.

Piscessive Project -- 1, has adopted and its enforcing:

- 1. A policy prohibiting the use of excessive force by law enforcement agencies within its jur scietion against any individuals engaged in non-violent civil rights demonstrations, and
- 2. A policy of enforcing applicable State and local laws against physically barring enhance to be exist from a facility or location which is the subject of such non-violent civil rights demonstrations within its jurisdiction.

Compliance with Anti-discrimination laws -- The grant will be conducted and administered in conformity with title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000d) and the Feir Hotsling Act (42 U.S.C. 3601-3619) and implementing regulations

**Lead-Huxed Point** -- Its activities concerning lead-based point will comply with the requirements of 2A CFR Part 35, Subparts A. B, J, K and R

Date

Compliance with Laws - It will comply with applicable laws.

Signature of Authorized Official

08/08/2022

iviayo

Title

# OPTIONAL Community Development Block Grant Certification

Submit the following certification only when one or more of the activities in the action plan are designed to meet other examinarity development needs having particular argency as specified in 24 CFR

The grantee hereby certifies that the Annual Plan includes one or more specifically identified CDBGassisted activities which are designed to meet other community development needs having particular urgency because existing conditions pose a serious and immediate threat to the health or welfare of the commodity and other financial resources are not available to meet such needs.

ature of Authorized Official

08/08/2022 Date

litle

# Specific HOME Certifications

The HOME participating jurispiction certifies that:

Tenant Based Rental Assistance — If it plans to provide tenant-based cental assistance, the tenant-based rental assistance is an essential element of its consolidated plan.

Eligible Activities and Costs — It is using and will use HOMB funds for eligible activities and costs, as described in 24 CFR §§92.205 through 92.209 and that it is not using and will not use FIOMB funds for prohibited activities, as described in §92.214.

Subsidy layering — He fore conuniting any funds to a project, it will evaluate the project in accordance with the guidelines that it adopts for this purpose and will not invest any more HOVE funds in combination with other federal assistance than is necessary to provide affordable housing:

\_\_\_

Date

08/08/2022

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Title

# Emergency Subulians Grants Certifications

The Emergency Solutions Crunts Program recipiont certifies than

Major rehabilitation/conversion/renovation — If an emergency shelter's rehabilitation costs exceed 75 percent of the value of the building before rehabilitation, the recipient will maintain the building as a shelter for homeless individuals and families for a minimum of 10 years after the date the building is first accupied by a homeless individual or family after the completed rehabilitation.

If the cost to convert a building into an emergency shelter exceeds 75 percent of the value of the building after conversion, the recipient will maintain the building as a shelter for non-class individuals and families for a minimum of 10 years after the date the building is first occupient by a homeway individual or family after the completed conversion.

In all other cases where ESG funds are used for renovation, the recipient will maintain the burleing as a shelter for homeless individuals and families for a minimum of 3 years after the date the building is districtly after the completed renovation.

lissential Services and Operating Costs – In the case of essistance involving sholter operations or essential services related to street outread or emergency shelter, the recipient will provide services or shelter to homeless individuals and families for the period during which the ESG assistance is provided, without regard to a particular site or solucture, so long the recipient serves the same type of persons (e.g., families with children, unaccompanied youth, disabled individuals, or victims of domestic violence) or persons in the same geographic area.

**Renovation** - Any renovation carried out with BSG assistance shall be sufficient to ensure that the building involved is safe and santagy.

Supportive Services — The recipient will assist homeless individuals in obtaining permanent housing, appropriate supportive services (including modical and mental health treatment victim services, obtaining, supervision, and other services essential for achieving independent living), and other Subpel State, local, and private assistance available for these individuals.

Matching Funds — The recipient will obtain matching amounts coguized under 24 CFR 576.201

Confidentiality — The propient has established and is implementing procedures to a sure the confidentiality of records pertaining to any individual provided family violence prevention or treatment services under any project assisted under the ESG program, including protection against the release of the address or coexism of any family violence shelter project, except with the written sufficiencing of the person responsible for the operation of that shelter.

Homeless Persons Involvement. To the maximum expert proceasible, the recipient will involve, through employment, volunteer services, or otherwise, normaless individuals and families in constructing, removating, maintaining, and spercting facilities assisted under the ESG program, in providing services assisted under the USG program, and in providing services for occupants of facilities assisted under the program.

Consolidated Plan + All activities the recipiont and ortakes with asy starso under ESO are consistent with its consolidated plan.

Discharge Policy — The recipient will establish and implement, to the maximum extent practicable and where appropriate, policies and protocols for the discharge of persons from publicly funded institutions or systems of care (such as health care facilities, manual health facilities, foster care or other youth facilities, or correction programs and institutions) in order to prevent this discharge from immediately resulting in horr eleasness for those persons.

08/08/2022

Signature of Authorized Official

Date

Title

Annual Action Plan 2022

# APPENDIX TO CERTIFICATIONS

INSTRUCTIONS CONCERNING LOBBYING CURTIFICATION:

# Lubbying Certification

Tanabying Comments

This certification is a material representation of fact upon which reliance was placed when this transaction was made or entered into. Submission of this certification is a prerequisite for making or entering into this transaction imposed by section 1352, title 31, U.S. Code. Any person who fails to file the required co. Control of the subject to a civil penalty of not less than \$10,000 and not more than \$100,000 for