

CITY OF O'FALLON

FY 2018 ANNUAL ACTION PLAN

DRAFT

Executive Summary

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

1. Introduction

The City of O'Fallon, MO has been an entitlement community since 2004. The Consolidated Plan represents our program years fourteen through eighteen as an entitlement community and outlines the uses of Community Development Block Grant (CDBG) funds for those years.

Since receiving this funding, the overall goal of the City of O'Fallon has been to assist the low-to-moderate income population within the City. As we enter our 16th year as an entitlement community, we have had the opportunity to reflect upon what we have accomplished over the past fifteen (15) years. We have assisted numerous citizens with home improvement repairs, including the installation of siding, with down payment assistance, transportation services, facility assistance, emergency homeless prevention and in a variety of other ways through the implementation of other programs.

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.

General goals related to housing and neighborhood issues that will be included in the plan include the following:

PRESERVE THE EXISTING HOUSING STOCK WITHIN O'FALLON BY:

- Ensuring that adequate buffering of adjacent commercial development
- Encouraging maintenance of owner-occupied and rental homes
- Initiating a re-occupancy program for owner-occupied homes
- Continuing to consider the introduction of a low-interest home loan program

ENCOURAGE DEVELOPMENT OF A VARIETY OF HOUSING TYPES BY:

- Approving attached single-family homes at appropriate locations
- Ensuring adequate buffering between developments of varying types
- Considering multiple family units of varying densities at appropriate locations

- Maintaining and enhancing existing codes that allow the co-location of commercial and residential uses within Downtown O’Fallon
- Work with the development community to encourage mixed-use developments that allow services within walking distance of residential areas.

PROVIDE HOUSING FOR VARIOUS AGE GROUPS – YOUNG FAMILIES, SENIOR CITIZENS, ETC.

- Consider attached housing or multiple family housing to serve senior citizens at appropriate locations
- Plan and maintain utility systems in areas where residences are served by septic systems.

There are specific goals within the CDBG Consolidated Plan to improve the affordability, and sustainability of the homes. These goals will be achieved by our Down Payment Assistance and Home Improvement Loan Programs.

Through the St. Louis HOME Consortium we will be able to offer first-time, low-to-moderate income homebuyer’s funding toward a down payment on affordable housing within O’Fallon city limits.

In order to preserve the City’s housing stock we will be using funding provided by the Community Development Block Grant to provide Home Improvement Loans to low-to-moderate income level individuals and families within the City limits of O’Fallon. By offering the Home Improvement Loan program to our residents we are providing them with the resources to do much-needed repair work around their homes. The repairs will improve their living environment and, in some cases, help the recipients stay in their homes.

The Home Improvement Loan Program is designed to help low-to-moderate income home owners with much-needed home repairs that they otherwise would not be able to afford on their own. The Home Improvement Loan Program is, in a sense, a homeless prevention tactic, because it helps keep our residents in their homes and off the streets. The City has also designed the Siding Installation/Repair Program to further protect neighborhood values, low-to-moderate income resident homeowners, ensuring that these much-needed and often emergency repairs are able to be remedied, keeping residents living safely and independently in their own homes. However, it has been shown through the research involved in the Consolidated Plan that there is a need for transitional and permanent housing for the homeless population in the St. Charles County area. The St. Charles Community Council will be looking into a possible solution to this problem for the program within the next year to ensure that as many low-income O’Fallon residents benefit from the federal funding as possible.

3. Evaluation of past performance

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

O'Fallon has created a program to address housing needs in the community, called the HOME IMPROVEMENT LOAN PROGRAM. This program will provide no-interest forgivable loans to qualifying households for the rehabilitation of owner-occupied single-family dwellings. The purpose of the loan is to bring existing housing up to code and to address accessibility and safety issues. The household must qualify as low-to-moderate income. This program is available community-wide.

The other housing program is the DOWN PAYMENT ASSISTANCE PROGRAM, which will provide down-payment and closing costs assistance to qualifying potential homeowners. This program will be funded by HOME funds through the St. Louis Home Consortium, due to the City's partnership with the HOME Consortium.

Another area of concern identified is the need for transportation services. While many could benefit from transportation services, the elderly and those with disabilities are especially in need of transportation services, primarily to and from the doctor's office and other places of need. Currently, there is no public transportation service available within the O'Fallon. The City will partner with the Mid East Area Agency on Aging to expand the limited senior transportation service that is already in place. By partnering with MEAAA, a higher percentage of the transportation needs of the seniors should be met. The City will also partner with OATS, Inc to expand the limited transportation options for those with disabilities. This partnership will allow for approximately two rides/month to accomplish essential shopping and/or attend medical appointments.

Public Service funds will be allocated to agencies based on a reimbursement process. The agencies will have to provide documentation showing that the organization spent monies helping O'Fallon residents to remain in their homes.

The City of O'Fallon also plans to use approximately 20% of the funds for administrative purposes.

4. Summary of Citizen Participation Process and consultation process

Summary from citizen participation section of plan.

For the Annual Plan, the goal of the citizen participation process is to encourage citizen participation in the planning process. Two weeks' notice was given regarding the Public Hearing to solicit input. Notices of the hearings were posted on the City's cable television channel, the City's e-newsletter, local media, and the City website. Other announcements were posted at library branches, grocery stores, restaurants, at City Hall and the City's rec center. The meeting was held in a handicapped-accessible building to accommodate O'Fallon's residents with disabilities.

A summary of the draft plan was posted on our cable TV channel, city website, and a press release was sent to local media. The summary described the contents of the plan and that the Annual Plan was available at City Hall or by written request. The plan was available for public comment for 30 days.

CITIZEN PARTICIPATION PLAN

Goal: As an entitlement Metropolitan City, our initial goal is to educate the community on the Community Development Block Grant (CDBG) program and to encourage citizen participation in the local consolidated planning process. Our long-term goal is to keep the public involved in our community and to provide opportunities to participate in the consolidated planning process on an annual basis.

Input Strategy: O'Fallon will continue to hold concurrent meetings with the public to get input on overall community planning and on the consolidated plan for CDBG programs. A minimum of two weeks' notice will be given regarding the times and dates of the public hearings. The public hearings will take place at times that are convenient to the public to maximize the opportunity for citizens to participate.

The City will hold at least two public forums per year to obtain citizens' views and to respond to proposals and questions. These forums will be conducted at two different stages of the program year. The hearings will address housing and community development needs, development of proposed activities, and review program performance. The City will hold at least one public hearing for citizen input before the consolidated plan is published for comment. A minimum of two weeks' notice will be given regarding the time and date of any public hearing.

O'Fallon has always been proactive in its communications with residents with many mechanisms for public input already in place. We publish and mail a quarterly newsletter directly to residents, have our own cable television channel and send weekly e-newsletters. In addition to measures outlined above, The City Council will also be encouraged to discuss the CDBG program whenever they attend a Ward or neighborhood meeting within targeted areas. Technical assistance will be provided by City staff to any persons, including groups representative of persons of low-to-moderate income, that requests such assistance in developing proposals for funding.

Review of proposed activities: Through our public postings, our cable TV channel, website, and local media, notice of the availability of the draft consolidated and/or annual plan will be published. The City will also submit press releases to local media to inform residents of the public hearings through local newspapers of general circulation. Copies will be available at City facilities. The summary will describe the contents of the plan and a list of the locations where copies of the entire proposed consolidated plan may be examined. The City will provide a reasonable number of free copies of the plan to citizens and groups who request a copy in writing. Upon request, the draft consolidated and/or annual plan will be made available to persons with disabilities in a format that is readily accessible.

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.

The City will provide at least 30 days for all interested parties to examine the plan and submit comments. The City of O'Fallon will consider any comments or views of citizens received in writing in preparing the final consolidated plan. A summary of these comments or views, and a summary of any comments or views not accepted and the reasons therefor, shall be attached to the final consolidated plan.

Complaints: Citizens who contact the City regarding a complaint will be directed to submit their complaint in writing. The City will provide a timely, substantive, written response to every written citizen complaint received within 15 working days, wherever practical. Any complaint should be submitted in writing to the following address:

City of O'Fallon

100 North Main Street

O'Fallon, MO 63366

Performance Reports: The City of O'Fallon shall annually review and report, in a form prescribed by HUD, on the progress it has made in carrying out its consolidated plan. This performance report shall be submitted to HUD within 90 days after the close of the jurisdiction's program year. The reports shall include an evaluation of the City's progress in meeting its specific objective of providing affordable housing, including the number and types of families served. The report shall also include a description of the use of CDBG funds during the program year and an assessment of the relationship of that use to the priorities and specific objectives identified in the plan.

Citizens will be provided at least two weeks' notice of the draft performance report. At least 15 working days will be provided to receive comments on the performance report before it is submitted. Notices for this comment period will be posted on all available community, public, and business bulletin boards and a press release will be submitted to local media.

The City of O'Fallon will consider any citizen comments or views received in writing in preparing the performance report. A summary of these comments or views, and a summary of any comments or views not accepted and the reasons therefore, shall be attached to the performance report.

Public Hearings: The City will provide a least two weeks' notice to citizens of any public hearing, with sufficient information published about the subject of the hearing to permit informed comment. Notices for public hearings will be posted on all available public, community, and business bulletin boards. A news release will also be submitted to local media.

Hearings will be held at times and locations convenient to potential and actual beneficiaries. Day and evening hours for hearings will be offered to allow for maximum public input. Appropriate actions will be taken to encourage the participation of all citizens including minorities and non-English speaking

persons, as well as persons with disabilities. Locations for public hearings will be handicapped-accessible. Citizens needing assistance or auxiliary aids will be advised to contact the City sufficiently in advance (no less than 24 hours) so that accommodations can be made.

Availability to public: The consolidated plan as adopted, substantial amendments, and the performance report will be available to the public in a form accessible to persons with disabilities, upon request. Copies will be available at City Hall.

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

7. Summary

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

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

The following are the agencies/entities responsible for preparing the Consolidated Plan and those responsible for administration of each grant program and funding source.

Agency Role	Name	Department/Agency
Lead Agency	O'FALLON	
CDBG Administrator		

Table 1 – Responsible Agencies

Narrative

Consolidated Plan Public Contact Information

Alexis Jaegers

100 N Main Street

O'Fallon, MO 63366

Phone: 636-379-5411

Fax: 636-978-4144

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

1. Introduction

The City of O'Fallon will be working with area organizations to utilize their experience and networks: North East Community Action Corporation (NECAC), Mid East Area Agency on Aging (MEAAA), OATS, Inc. and Sts. Joachim and Ann Care Service. MEAAA administers the Senior Transportation and Rides (STAR) Program for O'Fallon, OATS, Inc. administers the Disabled Transportation Program and Sts. Joachim and Ann Care Service administers our Emergency Homeless Prevention Program

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(l)).

NECAC is a not-for-profit Community Action Agency delivering a variety of social service programs to low-income elderly, youth, individuals with disabilities and those individuals and families who are disadvantaged through grants and contractual agreements with federal, state, county and local governments, other not-for-profit organizations and private businesses. NECAC's mission is to assist the disadvantaged living within a twelve county service area in their efforts to rise above poverty by providing needed services to enable each individual to function at his or her own improved financial, physical, mental and social level.

With over thirty years of community partnerships and community improvement programs, NECAC works with the community to leverage private dollars for services that will benefit the community. NECAC is governed by a volunteer thirty-six member Board of Directors and managed by a full-time professional executive director. The organizational structure assures local decision-making control and accountability as well as the ability to develop programs to operate and set policy and administrative procedures to assure the needs of the disadvantaged are met. The local Board involvement also assures officials and taxpayers that program goals and requirements are achieved efficiently.

There is currently no Public Housing Authority or Public Housing Developments in O'Fallon. However, NECAC administers the Section 8 Program for the Pike County Commission which acts as the signatory court for all twelve of NECAC's counties, including St. Charles County, where O'Fallon is located. For over twenty-five years, NECAC has administered the program for all of the counties

The MEAAA Senior Center is housed in a building owned by the City of O'Fallon, just south of City Hall. The STAR program is housed in that building and is coordinated by a MEAAA employee. Through the coordinator's case management skills, participants in the transportation programs can also benefit from other services MEAAA provides.

OATS, Inc is headquartered in Columbia, MO. It's regional office is located in Bridgeton, MO, but services a large number of O'Fallon residents. Residents are easily able to call to register for rides, with minimal advanced notice. Proof of O'Fallon residency is required. OATS, Inc works closely with a number of social service agencies, as well as medical and essential shopping facilities within the O'Fallon community, and is able to identify those who can benefit from this and other City services.

Sts. Joachim and Ann Care Service is housed in nearby St. Charles. Through their case management skills, participants in the Emergency Homeless Prevention Program can also benefit from other services they provide.

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.

- There are few services for the chronically homeless - especially single men or anyone without an established income. Chronically homeless men are generally housed for one or two nights in a motel, then are on their own. Single men can take a shower, do laundry, and get a hot meal at the Salvation Army Family Shelter, but cannot stay overnight.
- The Continuum of Care's Death Prevention Hotline allows for homeless individuals and families to call and be placed overnight in an area warming centers situated in within community churches on nights that are forecasted to be less than 20 degrees Fahrenheit.
- Homeless people are frequently found living in cars, in a tent in the woods, or staying warm in a 24-hour restaurant or emergency room.
- The homeless in our community include working poor families who have experienced a job loss or medical crisis, as well as individuals who may have permanent disabilities, including those with mental illness, veterans, or those with drug problems who are not receiving help.
- Youth in Need, serving homeless teens and young adults, and Crisis Nursery, serving at-risk and homeless families, are frequently full and must turn people away for services.
- Homeless persons are frequently "sent to St. Louis" by agencies without the resources to help them.
- There is an overwhelming need for permanent supportive housing to stabilize those who are homeless in our community.

The City of O'Fallon does not currently offer any shelters or beds for individuals or families who have lost their homes, but we do offer an Emergency Homeless Prevention program to our community members. This program will provide funds to one or more social service agencies to help people on the verge of homelessness. More details are given on this program in the Public Services section of this plan.

Overview: Funds of approximately \$16,000 a year will be allocated to an Emergency Fund for Homeless Prevention to help at least 10 households. The funds will be administered by a community social service

agency. Funds will cover emergency home repair, temporary shelter, utilities and rent/mortgage assistance.

Problem Area to be Addressed: To meet the needs of O'Fallon residents who may be on the verge of homelessness.

Problem Statement: Based on the economy, many residents are in need of day-to-day assistance to help them remain in their homes.

Strategy: The City of O'Fallon will allocate funds to agencies based on a proposal/qualifications process that was completed in 2017 (for Program Year 2018).

Note: As part of the Administration/Planning Cap, the City will allocate funding to assist with the annual Point in Time Count and vital information collection.

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

2. Agencies, groups, organizations and others who participated in the process and consultations

Table 2 – Agencies, groups, organizations who participated

1	Agency/Group/Organization	MID-EAST AREA AGENCY ON AGING
	Agency/Group/Organization Type	Services-Elderly Persons Regional organization
	What section of the Plan was addressed by Consultation?	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?	See previous description.
2	Agency/Group/Organization	COMMUNITY COUNCIL ST CHARLES
	Agency/Group/Organization Type	Housing Services-homeless Services-Health Service-Fair Housing Regional organization

<p>What section of the Plan was addressed by Consultation?</p>	<p>Housing Need Assessment 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 Lead-based Paint Strategy</p>
<p>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</p>	<p>Organization provides figures for each of the Needs Charts, as they operate the Continuum of Care and spearhead the eradication of homelessness in the community and instituting coordinated entry.</p>

3	Agency/Group/Organization	Sts. Joachim & Ann Care Service
	Agency/Group/Organization Type	Services - Housing Services-Children Services-Elderly Persons Services-Persons with Disabilities Services-Persons with HIV/AIDS Services-Victims of Domestic Violence Services-homeless Services-Health Services-Education Services-Employment Service-Fair Housing Services - Victims Regional organization
	What section of the Plan was addressed by Consultation?	Housing Need Assessment 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 Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Member of the Continuum of Care; receives Public Services Funding to address Emergency Homeless Needs in O'Fallon.

4	Agency/Group/Organization	NECAC
	Agency/Group/Organization Type	Housing Services - Housing Services-homeless Services-Health Services-Education Service-Fair Housing Regional organization
	What section of the Plan was addressed by Consultation?	Housing Need Assessment 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 Lead-based Paint Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Please refer to the description above.

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

N/A.

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

Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
Continuum of Care	Community Council of St. Charles County	Through the COC's HMIS, the organization provides tangible data regarding the housing-insecure within the O'Fallon community and helps to establish the goals of the plan.

Table 3 - Other local / regional / federal planning efforts

Narrative

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AP-12 Participation - 91.401, 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

The goal of the citizen participation process is to encourage citizen participation in the planning process. More than two weeks' notice is given regarding the Public Hearing to solicit input. Notices of the hearings were posted on the City's cable television channel, the City's e-newsletter, local media, and the City website. Other announcements are posted across the city at library branches, grocery stores, City Hall and other City facilities. The meeting was held in a handicapped-accessible building, which has two handicapped-accessible entrances, an elevator, handicapped-accessible restrooms for both men and women on all floors, and wide hallways and doorways to accommodate the handicapped residents of our community.

A summary of the draft plan was posted on our cable TV channel, and a press release was sent to local media. The summary described the contents of the plan and the entire Consolidated Plan could be received at City Hall or by written request. The plan was available for public comment for 30 days.

Goal: As an entitlement Metropolitan City, our initial goal is to educate the community on the Community Development Block Grant (CDBG) program and to encourage citizen participation in the local consolidated planning process. Our long-term goal is to keep the public involved in our community and to provide opportunities to participate in the consolidated planning process on an annual basis.

Input Strategy: O'Fallon will continue to hold concurrent meetings with the public to get input on overall community planning and on the consolidated plan for CDBG programs. A minimum of two weeks' notice will be given regarding the times and dates of the public hearings. The public hearings will take place at times that are convenient to the public to maximize the opportunity for citizens to participate.

The City will hold at least two public forums per year to obtain citizens' views and to respond to proposals and questions. These forums will be conducted at two different stages of the program year. The hearings will address housing and community development needs, development of proposed activities, and review of program performance. The City will hold at least one public hearing for citizen input before the consolidated plan is published for comment. A minimum of two weeks' notice will be given regarding the time and date of any public hearing.

The City of O’Fallon has always been proactive in its communications with residents and we have many mechanisms for public input already in place. We publish and mail a quarterly newsletter directly to residents, as well as weekly e-newsletters. We also produce our own cable television channel. Notices for these hearings will be posted at City Hall and at various community, public, and business bulletin boards throughout the City. Nonprofit organizations and other agencies will also be requested to provide input. The City plans to also utilize local media to assist in the educating of residents on the CDBG program and encouraging participation. The City Council will also be encouraged to discuss the CDBG program whenever they attend a Ward or neighborhood meeting within targeted areas.

Technical assistance will be provided by City staff to any persons, including groups representative of persons of low-to-moderate income, that request such assistance in developing proposals for funding assistance.

Citizen Participation Outreach

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (if applicable)
1	Internet Outreach	Non-targeted/broad community				
2	Public Hearing	Non-targeted/broad community				
3	Press Release	Non-targeted/broad community				

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (if applicable)
4	Social Media	Non-targeted/broad community				

Table 4 – Citizen Participation Outreach

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Expected Resources

AP-15 Expected Resources - 91.420(b), 91.220(c)(1,2)

Introduction

O'Fallon identified three programs to address housing needs in the community. The first housing program is a HOME IMPROVEMENT LOAN PROGRAM. This program provides no-interest, forgivable loans of up to \$5,000 to qualifying households for the rehabilitation of owner-occupied single-family dwellings and emergency repairs. The purpose of the Loan is to bring existing housing up to code and to address accessibility and safety issues. To qualify for this community-wide program, the household must qualify as low-to-moderate income. An amendment to the 2015 Annual Plan was submitted to HUD and approved to utilize the funding to further assist low-to-moderate income persons via a SIDING INSTALLATION/REPAIR PROGRAM with much-needed siding installation, replacement and/or repair. The Siding Program provides grants up to \$10,000 for the rehabilitation, installation and repair of siding on owner-occupied single-family dwellings. In total, funding

to the Home Improvement Loan Program and its Siding Installation/Repair Program will benefit at least 20 households.

Anticipated Resources

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
CDBG	public - federal	Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services	252,891	20,000	0	272,891	0	Allocation totals subject to change upon approval of final 2018 Budget HOME IMPROVEMENT LOAN PROGRAM SIDING INSTALLATION/REPAIR PROGRAM EMERGENCY HOMELESS PREVENTION PROGRAM DOWN PAYMENT ASSISTANCE SENIOR TRANSPORTATION AND RIDES PROGRAM DISABLED TRANSPORTATION PROGRAM ADA PUBLIC FACILITY ASSISTANCE PROGRAM

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

The second housing program that addresses housing concerns is the DOWN PAYMENT ASSISTANCE PROGRAM. This program is funded by HOME monies through the St. Louis County HOME Consortium rather than the CDBG funds. The program assists low-to-moderate income first-time homebuyers with the purchase of an affordable home. It requires that the eligible participants attend housing counseling before and during the assisted purchase of the home. This program is available community-wide. During 2017, the consortium had agreements with NECAC, Beyond Housing, and Better Family Life for program delivery and service. The City’s goal is to assist homeowners with down payment and closing cost assistance. Due to the HOME allocation from the St. Louis Home Consortium, 0% of total CDBG funds are allocated for this program.

Another area of concern highlighted via the public comments is homelessness in St. Charles County, specifically in O'Fallon. To help alleviate this problem, the City of O'Fallon implemented the EMERGENCY HOMELESS PREVENTION PROGRAM. This program assists O'Fallon residents on the brink of homelessness through financial assistance, helping to keep them living in their homes. To accomplish this, the City of O'Fallon has contracted with Sts. Joachim and Ann Care Service to provide low-to-moderate residents with mortgage, rent and utilities assistance. The City of O'Fallon allocates approximately six percent (6.7%) of the anticipated funds to this program.

The SENIOR TRANSPORTATION AND RIDES PROGRAM is a program designated for O'Fallon's senior citizens that dates back to 2004. The city's aging population is in need of transportation services to and from medical appointments and doctors' offices. As there is presently no public transportation service in O'Fallon, finding reliable medical transportation for many senior citizens becomes extremely challenging. Through the program, riders are pre-qualified to determine whether they meet the age and/or low-to-moderate income requirements. Approximately, six and a half percent (6.3%) of the anticipated total CDBG funds are allocated to this program. In addition to transportation, MEAAA also provides case management services to the participants in the program to ensure that all needs are being met.

The DISABLED TRANSPORTATION PROGRAM started in 2014 and is a program specifically for residents with disabilities. O'Fallon's population with disabilities is in need of transportation services to and from both medical and essential living appointments. Currently, there is no public transportation service in O'Fallon. In an attempt to assist a larger number of O'Fallon residents with disabilities, the program is capped at a maximum of 2 round-trip rides per month per resident. Limits on the distance of rides also apply. Approximately two percent (2%) of total CDBG funds are allocated to this program.

In 2008, the City of O'Fallon implemented a COMMUNITY PLANNING project that helped to identify unmet needs and assisted with strategic planning in regards to O'Fallon's homeless and low-to-moderate level income residents. Through the program, the city provides assistance to the Community Council of St. Charles County/Continuum of Care. The Community Council, using an integrated HMIS system, collects streamlined data on homeless and low-income residents and their needs, as well as whether or not their needs were met, all within St. Charles County. The reports provided by the Council are used to apply for additional federal funding and to choreograph services within our community. The program and the information it has provided has enabled the City of O'Fallon to further assist and develop our community resources.

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

identified in the plan

N/A

Discussion

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Annual Goals and Objectives

AP-20 Annual Goals and Objectives - 91.420, 91.220(c)(3)&(e)

Goals Summary Information

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	PRESERVE THE EXISTING HOUSING STOCK	2016	2020	Non-Housing Community Development			CDBG: \$159,672	Homeowner Housing Rehabilitated: 21 Household Housing Unit
2	ENCOURAGE DEVELOPMENT OF A VARIETY OF HOUSING	2016	2020	Affordable Housing			CDBG: \$39,921	Public service activities other than Low/Moderate Income Housing Benefit: 242 Persons Assisted
3	PROVIDE HOUSING FOR VARIOUS AGE GROUPS	2016	2020	Affordable Housing Non-Homeless Special Needs Non-Housing Community Development			CDBG: \$0	Direct Financial Assistance to Homebuyers: 11 Households Assisted

Table 6 – Goals Summary

Goal Descriptions

1	Goal Name	PRESERVE THE EXISTING HOUSING STOCK
	Goal Description	

2	Goal Name	ENCOURAGE DEVELOPMENT OF A VARIETY OF HOUSING
	Goal Description	
3	Goal Name	PROVIDE HOUSING FOR VARIOUS AGE GROUPS
	Goal Description	

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AP-35 Projects - 91.420, 91.220(d)

Introduction

Affordable housing is a major problem not just in O’Fallon, but throughout St. Charles County. The Housing Task Force of the Community Council of St. Charles County released a report on affordable housing citing the following barriers:

- A strong housing market that drives up demand for housing and inflated housing prices
- Restrictive zoning: minimum lot size and unnecessary amenities
- Zoning laws which have been resistant to manufactured housing
- Negative stereotype of both buyers of lower priced housing and renters
- Lengthy and uncertain approval and permitting process

Aside from the goals set forth with the City’s Comprehensive Plan, there are specific goals within the CDBG Consolidated Plan to improve the affordability, and sustainability of the homes. These goals will be achieved by our Down Payment Assistance and Home Improvement Loan Programs.

Through the St. Louis HOME Consortium we will be able to offer first-time, low- to moderate- income homebuyer’s \$5,000 toward a down payment on affordable housing in O’Fallon city limits.

In order to preserve the City’s housing stock we will be using funding provided by the Community Development Block Grant to provide Home Improvement Loans to low- to moderate- income level individuals and families within the City limits of O’Fallon. By offering the Home Improvement Loan program to our residents we are providing them with the resources to do much-needed repair work around their homes. The repairs will improve their living environment and, in some cases, help the recipients stay in their homes.

Currently, no Public Housing Authority or public housing developments exist in O’Fallon. However, NECAC administers the Section 8 Program for the Pike County Commission which acts as the signatory court for all 12 counties served by NECAC, including St. Charles County, where O’Fallon is located. For over 25 years, NECAC has administered the program for all of the counties.

#	Project Name
1	Admin
2	EHP
3	ADA
4	STAR
5	Disabled Transportation
6	HILP
7	Siding Program

Table 7 – Project Information

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

As outlined in the Consolidated Plan, the City of O'Fallon placed priority on preserving its housing stock to ensure the safety, security, and accessibility of its resident homeowners. In highlighting this goal in regards to allocation, the City has focused on preserving not only its neighborhoods, housing prices and community, but also accounting for the needs of the resident, ensuring that he/she is able to live a full, independent life regardless of income. Even the priority placed on public services funding/allocation speaks to the desire to protect, empower, and provide a sense of security to its residents in the area of rent, mortgage, utility assistance, as well as transportation. The City of O'Fallon strives to eliminate as many housing and housing-related barriers as possible via CDBG funding.

DRAFT

AP-38 Project Summary
Project Summary Information

DRAFT

1	Project Name	Admin
	Target Area	
	Goals Supported	PRESERVE THE EXISTING HOUSING STOCK ENCOURAGE DEVELOPMENT OF A VARIETY OF HOUSING PROVIDE HOUSING FOR VARIOUS AGE GROUPS
	Needs Addressed	Home Improvement Loan Program Down Payment Assistance Program Transportation Emergency Homeless Prevention ADA Public Facility Assistance
	Funding	:
	Description	This program pays for a portion of the Public Assistance Specialist wages/benefits and for general admin costs in association with administering the CDBG grant.
	Target Date	
	Estimate the number and type of families that will benefit from the proposed activities	N/A As this project is focused on the administrative component of managing the programs and activities that directly benefit O'Fallon's low-to-moderate income families and homeowners.
	Location Description	O'Fallon, MO
	Planned Activities	This activity assists with the wages for the Public Assistance Specialist and other admin costs relating to the CDBG program.
2	Project Name	EHP
	Target Area	
	Goals Supported	PRESERVE THE EXISTING HOUSING STOCK PROVIDE HOUSING FOR VARIOUS AGE GROUPS
	Needs Addressed	Emergency Homeless Prevention
	Funding	:
	Description	This program pays for mortgage, rent and utility assistance for O'Fallon residents on the brink of homelessness.
	Target Date	12/31/2018

	Estimate the number and type of families that will benefit from the proposed activities	At least fifteen (15) families, a majority of which are female head of household.
	Location Description	O'Fallon, MO
	Planned Activities	Provide funding to subrecipient to administer mortgage, rent and/or utility assistance.
3	Project Name	ADA
	Target Area	
	Goals Supported	
	Needs Addressed	ADA Public Facility Assistance
	Funding	:
	Description	This program supports ADA improvements to public facilities and walkways.
	Target Date	
	Estimate the number and type of families that will benefit from the proposed activities	N/A Improvements will be made to either the Senior Center Parking Lot walkways to ensure that they are ADA compliant, or to highly travelled sidewalks, providing accessibility to those who are aging and/or disabled.
	Location Description	O'Fallon, MO
	Planned Activities	Improvements will be made to highly travelled sidewalks, providing accessibility to those who are aging and/or disabled.
4	Project Name	STAR
	Target Area	
	Goals Supported	ENCOURAGE DEVELOPMENT OF A VARIETY OF HOUSING PROVIDE HOUSING FOR VARIOUS AGE GROUPS
	Needs Addressed	Transportation
	Funding	:
	Description	This program pays for a portion of the wages of a Mid-East Area Agency on Aging (MEAAA) employee to administer the Senior Transportation and Rides (STAR) Program.
	Target Date	12/31/2018

	Estimate the number and type of families that will benefit from the proposed activities	The Star Coordinator schedules approximately 50 rides/month for O'Fallon's aging residents.
	Location Description	O'Fallon, MO (will travel to locations within St. Charles County for medical appointments, if not available within O'Fallon city limits).
	Planned Activities	Provide funding to subrecipient to deliver much needed transportation services.
5	Project Name	Disabled Transportation
	Target Area	
	Goals Supported	PROVIDE HOUSING FOR VARIOUS AGE GROUPS
	Needs Addressed	Transportation
	Funding	:
	Description	This program pays for medical and essential living transportation for O'Fallon residents with disabilities.
	Target Date	12/31/2018
	Estimate the number and type of families that will benefit from the proposed activities	Approximately five (5) O'Fallon residents/month will benefit from this transportation service.
	Location Description	O'Fallon, MO (will travel to locations within St. Charles County for appointments if not available within O'Fallon city limits).
	Planned Activities	Provide funding to subrecipient to deliver much needed transportation services.
6	Project Name	HILP
	Target Area	
	Goals Supported	PRESERVE THE EXISTING HOUSING STOCK
	Needs Addressed	Home Improvement Loan Program
	Funding	:
	Description	This program provides a 5 year, 0% interest forgivable loan to eligible O'Fallon residents to assist with code violation repairs and other home improvements.
	Target Date	12/31/2018

	Estimate the number and type of families that will benefit from the proposed activities	At least thirteen (13) families will benefit from the repair/replacement offered through O'Fallon's \$5,000 interest-free, 5-year forgivable loan.
	Location Description	O'Fallon, MO
	Planned Activities	Providing housing repair assistance to resident homeowners who meet all qualifications.
7	Project Name	Siding Program
	Target Area	
	Goals Supported	PRESERVE THE EXISTING HOUSING STOCK
	Needs Addressed	Home Improvement Loan Program
	Funding	:
	Description	This program will provide siding installation/repair assistance to eligible O'Fallon residents.
	Target Date	12/31/2018
	Estimate the number and type of families that will benefit from the proposed activities	At least eight (8) families will benefit from this grant program, developed to assist low-to-moderate income residents.
	Location Description	O'Fallon, MO
	Planned Activities	Providing siding assistance to resident homeowners who meet all qualifications.

AP-50 Geographic Distribution - 91.420, 91.220(f)

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

The 2000 Census enumerated the City of O’Fallon’s population as 46,169, and the 2002 Census data showed a population over 50,000, thus, qualifying O’Fallon as an “Entitlement Community”. The trend in growth continues, with the 2014 Census data estimates shows O’Fallon with a population of 84,009.

The racial composition of the community is 88.2% white with the remaining 11.8% comprised of other racial and ethnic groups, based on the American Community Survey 5-Year Estimates. The minority population increased more than 500% between 2000 and 2005 and continued to grow through the rest of the decade. (Pull info from Census website)

In 2014, the median household income was \$76,763. However, 4.2% lived below the poverty level. Of the population aged 21 to 64 years, about 6.8% is disabled. The elderly population (over 65 years of age) comprises 8.9% of the population. Based on these numbers, the City of O’Fallon’s aging and minority population numbers have seen great growth, as well as the percentage of residents living below the poverty level.

CDBG investments are made citywide since low-to-moderate income persons are not concentrated in only one geographic area of the city. The north side of O’Fallon between Interstate 70 and Tom Ginnever Avenue has a large concentration of the older housing stock and lower-assessed home values. However, other more affordable housing options, such as mobile homes and multi-family structures, are distributed throughout the city.

Geographic Distribution

Target Area	Percentage of Funds
O’FALLON	100

Table 8 - Geographic Distribution

Rationale for the priorities for allocating investments geographically

One of the greatest obstacles in meeting underserved needs is the distance to and invisibility of social services for O’Fallon residents. At first glance, there seems to be very few social services in O’Fallon. The majority of social service agencies are at least 10 miles away in St. Charles City and St. Charles County. For those in need, transportation can be a major barrier to seek the services they so desperately need. In order to address this problem, O’Fallon CDBG funds have been allocated to Mid-East Area Agency on Aging (MEAAA) to provide senior transportation assistance and OATS, Inc to provide transportation assistance for residents with disabilities.

Another obstacle has been the lack of coordination of services. However, this problem is currently being

ameliorated through the actions of the Continuum of Care and the St. Charles Community Council and their implementation of an intuitive HMIS system. It is here, through the creation of strong network of social service agencies, local governments and other interested entities, common goals can more be achieved in harmony, streamlining the system and better meeting the needs of all involved. Additionally, the organization MoRides has worked to help link St. Charles County residents with the best possible transportation options for their situation.

Discussion

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AP-75 Barriers to affordable housing -91.420, 91.220(j)

Introduction

The most prevalent barrier seems to be the negative stereotype associated with affordable housing, along with

- A strong housing market that in years past drove up demand for housing and inflated housing prices
- Restrictive zoning: minimum lot size and unnecessary amenities
- Zoning laws which have been resistant to manufactured housing
- A negative stereotype of both buyers and renters of lower priced housing
- A lengthy and uncertain approval and permitting process

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 O'Fallon, the growth of residential development has slowed, as indicated by the number of building permits issued this year, which is likely to keep housing prices more stable. Furthermore, the City has approved several developments recently that have a mix of unit types. These include a combination of single family homes with lots ranging in size, as well as villas, row homes, condominiums and apartments. Having this mix of units does allow for different price points.

Six multi-family apartment structures have been completed that provide our community with Work Force Housing. The O'Fallon Lakes Apartment Complex is a 266 multi-family unit housing development by Gundaker Commercial Group located on the south side of Interstate 70. Units offer an after-school daycare facility, a computer center, a fitness center, and sport court areas, a laundry, and a car wash facility. The second is the Southernside Apartment project. This 220 multi-family unit is nestled on 15 acres Weldon Springs Road and Crusher Road on the south side of O'Fallon. The complex offers a lake with a walking trail, fitness center, game room, two pools, a business center and a club house. The third is Millpond Senior Apartments. This 52-unit senior living facility offers a wide range of amenities, including walking trails, picnic areas, computer labs, a beauty salon, and a wellness center. The fourth is Gentemann Manor, a 120-unit senior living facility with a community

center. All the mention developments are offered on an income-based process. The fifth, the Village of St. Mary's development in downtown O'Fallon offers 60 units to seniors. Woodbury Phase II was completed last year offering an additional 42 units for seniors, and the City is seeking additional options to best meet the needs of its residents.

The City of O'Fallon is working with the St. Charles County Housing Task Force to determine the amount of perceived discrimination towards various groups and to develop strategies to further fair housing.

The City's building permits are currently being issued in a timely manner. However, there are no special circumstances in which affordable housing permits are being reviewed any sooner than other permits that the City reviews.

Discussion

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AP-85 Other Actions - 91.420, 91.220(k)

Introduction

By creating a strong network of social service agencies, local governments and other interested entities, common goals can be achieved in harmony.

Actions planned to address obstacles to meeting underserved needs

Strategies to further housing objectives that do not require specific grant funds, but do require the time of the Public Assistance Specialist, include:

- Working with the Community Council's Housing Task Force, The St. Charles County Housing Team, The St. Charles County Home Repair Network, and the Continuum of Care and other area non-profit organizations and agencies, as well as realtors, lenders and insurance agents to increase the number and variety of housing for first-time buyers, seniors, etc.
- Cooperate with Habitat for Humanity to supply affordable housing by providing information regarding vacant residential lots and condemnations.
- Coordinate the City of O'Fallon's Project HOME Golf Tournament each year, which funds programs to assist low-income homeowners' with needed home repairs pertaining to code violations.

Actions planned to foster and maintain affordable housing

Currently, no Public Housing Authority or public housing developments exist in O'Fallon. However, NECAC administers the Section 8 Program for the Pike County Commission which acts as the signatory court for all 12 counties served by NECAC, including St. Charles County, where O'Fallon is located. For over 25 years, NECAC has administered the program for all of the counties.

The City will continue to work with developers to provide housing opportunities to meet the needs of all segments of the population including households with special needs, such as the elderly, disabled, female-headed households and lower-income families. We recognize that high quality housing at all price levels enhances the overall quality of life of our citizens.

As stated earlier, the most prevalent barrier seems to be the negative stereotype associated with affordable housing. The City of O'Fallon continues to work with the St. Charles County Housing Task Force to determine the amount of perceived discrimination towards various groups and to develop strategies to affirmatively further fair housing.

The City's building permits are currently being issued in a timely manner. However, there are no special circumstances in which affordable housing permits are being reviewed any sooner than other permits

that the City reviews.

Additionally, the City of O’Fallon joined the St. Louis County HOME Consortium in 2006. The HOME Consortium provides O’Fallon with additional funds to be used for the Down Payment Assistance program. The Down Payment Assistance program helps eligible first-time home buyers who meet the HUD mandated income requirements by providing up to \$5,000 in an interest-free loan to be used toward a down payment on a home within O’Fallon City limits. The funds do not require a match from the homebuyer, and the loan is forgiven after five years if the home owner does not refinance, sell, or rent out the property.

Actions planned to reduce lead-based paint hazards

All homeowners in the Home Improvement Loan Program, regardless of when the home was built (but especially those with houses built before 1978) are given the “Protect Your Family from Lead In Your Home” pamphlet, and must sign a “Confirmation of Receipt” for documentation purposes. In addition, the homes must undergo lead-based paint testing on the areas of a home where existing paint will be disturbed by home improvement projects. Lead-based paint testing is done by United Infrastructure Corporation, which is a woman-owned business and independent agency.

Since much of the housing stock was built in the last 50 years, lead problems are not as prevalent as in other communities. Approximately 1/3 of the housing structures were built before 1980 with less than 2% built before 1950. When houses are found to contain lead, actions will be taken to consult with a lead hazards and abatement firm. Furthermore, strategies will be developed with other community organizations for educating rental property owners, homeowners, and occupants of rental housing about lead-based paint hazards. The northern areas of the City will be targeted, since approximately 57% of these houses were built before 1980.

Actions planned to reduce the number of poverty-level families

The City of O’Fallon does not yet have any specific programs or policies with regard to reducing the number of poverty-level families. However, there are numerous agencies in our community that work to provide training and development to actively raise O’Fallon families out of poverty including but not limited to the Workforce Development Center, Sts. Joachim and Ann Care Service, NECAC and Connections to Success. The City will continue to become familiar with these programs and others, and assist where appropriate. There are a number of agencies providing a wide range of housing and supportive services to the community. Mid-East Area Agency on Aging (MEAAA) and Willows Way provide supportive services to the elderly. MEAAA operates a limited senior transportation program out of the O’Fallon Senior Center. Willows Way coordinates case management for low-income senior citizens and individuals with disabilities to prevent at-risk status and homelessness due to lack of self-preservation skills.

The Crider Center provides primary and mental health services to children, youth, and adults who have

mental health needs. The non-profit agency annually serves over 14,000 individuals throughout St. Charles, Franklin, Lincoln and Warren Counties. Services include community support, housing support, employment services and psychosocial rehabilitation for persons who have serious mental illness and who are low income.

Advocacy groups for persons who are aging and/or disabled indicate a need to provide affordable housing. There is also a need to provide accessibility and universal design in both renter and owner-occupied units. In addition to housing and accessibility, transportation services are also lacking in O'Fallon and throughout St. Charles County. No bus transportation service is available except for a limited service system within the City of St. Charles.

Actions planned to develop institutional structure

The City of O'Fallon will be working with four community-based organizations to utilize their experience and networks: North East Community Action Corporation (NECAC), Mid-East Area Agency on Aging (MEAAA), OATS, Inc and Sts. Joachim and Ann Care Service. MEAAA is administering the Senior Transportation and Rides (STAR) Program for O'Fallon, OATS, Inc is administering the Disabled Transportation Program, and Sts. Joachim and Ann Care Service administers our Emergency Homeless Prevention Program.

NECAC is a not-for-profit Community Action Agency delivering a variety of social service programs targeting low-income senior citizens, children and young adults, and individuals with disabilities through the use grants and contractual agreements with federal, state, county and local governments, other not-for profit organizations and private businesses. NECAC's mission is to assist the disadvantaged living within a 12- county service area in their efforts to rise above poverty by providing needed services to enable each individual to function at his or her own improved financial, physical, mental and social level.

NECAC works to leverage private dollars for services that will benefit the community, and has been doing so for over thirty years. NECAC is governed by a volunteer thirty-six (36) member Board of Directors and managed by a full-time professional executive director. The organizational structure assures local decision-making control and accountability as well as the ability to develop programs to operate and set policy, and administrative procedures to assure the needs of the disadvantaged are met. The local Board involvement also assures officials and taxpayers th

The MEAAA Senior Center is housed in a building owned by the City of O'Fallon, just south of City Hall. The STAR program is housed in that building and is coordinated by a MEAAA employee. Through the coordinators' case management skills, participants in the transportation programs can also benefit from the extensive list of other services MEAAA provides.

Sts. Joachim and Ann Care Services is housed in nearby St. Charles. Through their case management skills, participants in the Emergency Homeless Prevention Program can also benefit from other services

they provide, including but not limited to employment services/counseling, participation in the food pantry, assistance with seeking additional assistance and so much more.

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

There are a number of agencies providing a wide range of housing and supportive services to the community. Mid-East Area Agency on Aging (MEAAA) and Willows Way provide supportive services to senior citizens. Crider Health Center provides mental health services to children, youth, and adults who have mental health needs.

Advocacy groups for those who individuals who are aging and/or disabled indicate a need to provide affordable housing. There is also a need to provide accessibility and universal design in both renter and owner-occupied units. In addition to housing, transportation services are also lacking in O'Fallon and throughout County. No public transportation service is available except for a limited service system within the City of St. Charles.

The Community Council of St. Charles County currently operates the County's HMIS, with nine agencies currently using the system to generate reports, minimize duplication of service and to best meet the needs of the housing-sensitive community in O'Fallon. This system has begun to better link residents to the services they need to remain living safely and independently in their homes.

According to data, the AIDS population is very small and no special housing exists. Furthermore, the City of O'Fallon will not be participating in Homeless Opportunities for Persons with AIDS (HOPWA).

Discussion

Program Specific Requirements

AP-90 Program Specific Requirements - 91.420, 91.220(I)(1,2,4)

Introduction

Proposed Uses of CDBG Funds

Housing Programs

Home Improvement Loan Program	\$82,379.15
Siding Installation/Replacement Program	\$82,000.00

Public Services

Emergency Homeless Prevention	\$16,933.65
Senior Transportation and Rides Program	\$16,000.00
Disabled Transportation Program	\$5,000.00

Community Development

ADA Public Facility Assistance Program	\$20,000.00
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Grant Administration

\$50,578.20

Total

\$272,891.00

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 | 20,000 |
| 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:	20,000

Other CDBG Requirements

1. The amount of urgent need activities	21
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.	98.00%

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Discussion

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