2014 Program Year

Annual Action Plan

The CPMP 2012 Annual Action Plan includes the SF 424 and Narrative Responses to Action Plan questions that CDBG, HOME, HOPWA, and ESG grantees must respond to each year in order to be compliant with the Consolidated Planning Regulations. As of May 2006, the Executive Summary narratives are required.

Narrative Responses

Updated with additional requirements (highlighted/in **BOLD**) as of 5/21/2007

GENERAL

GRANTEE: City of Fond du Lac
CON PLAN PERIOD: 2012 to 2016

Executive Summary (92.220(b))

1. **The Executive Summary is required. Include the objectives and outcomes identified in the plan and an evaluation of past performance.**

   PY 2014 Action Plan Executive Summary:

   The 2014 Annual Action Plan is submitted as a result of a resolution approved by the City of Fond du Lac's Redevelopment Authority on January 9, 2014. The 2014 Annual Plan is the third year of the five (5) year Consolidated Plan 2012-2016.

   The allocation of Community Development Block Grant (CDBG) funds for the 2014 program year is based upon an estimated grant award from the U.S. Department of Housing and Urban Development (HUD). The City's anticipates receiving approximately $425,856 in CDBG entitlement funds for PY2014 and $120,000 in Program Income.

   The City of Fond du Lac CDBG entitlement program was initially funded in 2004. The CDBG program is the most flexible source of funds to meet local housing, economic development, public services and community development needs with the allocation directed to meet one of three (3) federal objectives:

   1) Benefit low and moderate income households
   2) Eliminate slum and/or blight
   3) Meet a specific urgent need

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Based upon the estimated entitlement and estimated revolving fund balance for 2013, the approved activities are summarized below.

Estimated 2014 Entitlement:	$425,856
Estimated 2014 Revolving:	$120,000
Total:	$545,856

PY2014 Approved Activities

Owner Occupied Housing Rehabilitation Loans (1-4 Unit Structures)	$220,000
Renter Occupied Housing Rehabilitation Loans (1-4 Unit Structures)	$0
Rehabilitation Program Administration	$40,000
Homestead Opportunity Program	$15,000
Blight Elimination	$30,000
Public Facilities	$30,000
Boys & Girls Club	$20,000
Help at Home for the Elderly	$7,500
Homeless Shelter Utility Assistance	$10,800
Warming Shelter Extended Hours	$5,000
Dental Care Assistance	$10,000
Mentoring	$10,000
Undesignated	$38,556
Administration	$109,000
Total	$545,856

The FY2014 appropriation for the U.S. Department of Housing and Urban Development has not been determined. If the actual allocation amount is less than the City's estimate, the proposed activities budgets for the PY2014 Annual Action Plan for the City of Fond du Lac will be proportionally decreased from the estimated funding levels to match actual allocation amounts. If the actual allocation amount exceeds the City's estimate, the City will increase the Homestead Opportunity, Public Facilities and Blight Elimination activity budgets based upon the amount of additional funding.

Objectives:

Each of the above listed activities either directly or indirectly meets the objectives of benefitting low-and-moderate income persons by providing decent housing or a suitable living environment. The housing rehabilitation loan program, homestead opportunity program, homeless shelter utility assistance and warming shelter extended hours are targeted at providing decent housing while the remaining activities are directed at improving or creating a suitable living environment.

Outcomes:

The housing rehabilitation program and homestead opportunity program work to improve the affordability of decent housing, while the homeless shelter assistance aims to improve the sustainability of this housing resource and the warming shelter extended hours hopes to improve or increase the availability and accessibility of decent housing.

The Boys & Girls Club, Dental Care and Help at Home programs work to improve the availability and accessibility of services that improve/create a suitable living environment. The blight elimination and rehabilitation grant programs work to improve the sustainability of the living environment.

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Evaluation of Past Performance:
The City of Fond du Lac has strived to increase collaboration among community partners and leverage multiple funding sources to meet the housing and community development needs of the City. The City utilizes the Consolidated Annual Performance Evaluation Report (CAPER) process as an opportunity to identify areas for improvement and have not received any corrective actions. In the past, the City has budgeted and often exceeded the minimum 70% benefit to low and moderate income persons and has met the 1.5 standard for timeliness for CDBG funds at its 60-day review.

Summary of Citizen Participation Efforts:
The City implemented its Citizen Participation Plan, holding two public hearings, providing proper notice and holding open a 30-day comment period. During the public hearing, one agency identified a need as part of the needs assessment process, Help at Home for the Elderly and Disabled. The need was addressed in the PY2014 Annual Action Plan. In addition, several other attendees expressed interest in the CDBG program and how it worked. No comments were received outside of the public hearing. Efforts to broaden public participation included emailing the notice of public hearing to over 50 contacts at agencies and organizations city-wide.

For the October 15, 2013 needs hearing, the RDA had two (2) individuals sign in to speak or ask questions and four (4) others that did not sign in but came to attend the meeting.

In addition, staff met one-on-one with one of the individuals from the October Public Hearing to address questions and explain the program. Staff attempted to contact one of the other individuals via email but did not receive a response.

Action Plan Required Elements:

Geographic Distribution/Allocation Priorities:

2. Describe the geographic areas of the jurisdiction (including areas of low income families and/or racial/minority concentration) in which assistance will be directed during the next year.

*Please note that maps or other attachments may be included as additional files within the CPMP Tool.

PY 2014 Action Plan Geographic Distribution/Allocation response:

For the most part, the City of Fond du Lac has a development pattern typical of long established Wisconsin communities: a central business district surrounded by rings of progressively newer housing; predominantly single-family homes. Densities are higher closer to the core. Supplementing this pattern is a large highway and retail oriented commercial district along West Johnson Street (WI 23) and the frontage roads that parallel US 41. In this same northwest quadrant is a large multi-family residential district with a high proportion of subsidized housing. Along the periphery are several industrial/business parks that are within a short distance of US 41.

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The City has conducted an analysis of the 2000 Census to identify areas, on a block group basis, which will have a concentration of 51% or more low and moderate income persons. That study indicates the following block groups as meeting the criteria:

402-4	405-1	405-4	407-3
403-4	405-2	407-1	410-3

The Low and Moderate Income Summary Data has not been updated with 2010 Census Data or American Community Survey data.
Also please see Attachments section for maps which identify the specific block groups geographically.

We also have identified the location of racial and ethnic minority group concentrations by census tract. In order to make the analysis more useful, we have excluded Tract 420 from the City total due to its large institutional (Taycheedah Correctional Facility) population which would otherwise distort the analysis.

African-American (AA): The African-American population is concentrated in the following census tracts: 411 (1.2%), 405 (1.3%), and 403 (1.6%). While these are concentrations, they still represent small numbers of African-Americans and percentage wise only a relatively slight increase over the City-wide ratio of 0.8%.

Hispanic (HSP): The City-wide distribution of Hispanics is 2.9%. Slight concentrations of this group are found in census tracts 405 (5.0%) and 403 (6.5%).

American Indian/Alaska Native (AIAN):The City-wide distribution of American Indian/Alaska Natives is 0.4%. Slight concentrations of this group are found in census tracts 402 (0.6%) and 405 (0.6%).

Asian/Native Hawaiian and Pacific Islander (ANHPI):The City-wide distribution of Asian/Native Hawaiian and Pacific Islanders is 1.5%. Slight concentrations of this group are found in the following census tracts: 403 (2.6%), 405 (3.0%), and 402 (3.7%).

Some Other Race (SOR): The City-wide distribution of individuals that identified with Some Other Race is 1.3%. Slight concentrations are found in census tracts 405 (2.4%) and 403 (3.6%).

Overall concentrations of minorities are most pronounced in census tracts 403 and 405 with 4 of the 5 groups having concentrations in 403 and all 5 groups in census tract 405.

3. Describe the reasons for allocating investments geographically within the jurisdiction (or within the EMSA for HOPWA) (91.215(a)(1)) during the next year and the rationale for assigning the priorities.

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PY 2014 Action Plan Geographic Distribution/Allocation response:

The City of Fond du Lac intends to use the large majority of its funds within the census block groups that have high concentrations of low-and moderate income (LMI) persons.

1) These block groups represent the greatest need for housing rehabilitation, replacement of public infrastructure, concentration of housing affected by lead paint, location of historic properties, need for economic development and job creation, location of concentration of minority groups and other community development priorities.
2) Site specific projects are typically within block groups that have a high concentration of LMI persons.
3) The assignment of priority needs was made on the basis of input from housing and service providers at the various meetings, input at public hearings and staff/RDA assessment of needs.
4) The RDA and staff also assessed the ability of the City to spend the funds in an effective manner and at a reasonable cost.
5) The City also determined that a balance of funding was important. As such, the City's allocation looks at funding activities in several CDBG program areas including: housing, public services through community partnerships, economic development and brownfield/blight elimination.

4. Describe actions that will take place during the next year to address obstacles to meeting underserved needs.

PY 2014 Action Plan Geographic Distribution/Allocation response:

1) One obstacle to meeting underserved needs is the lack of applications for the housing rehabilitation loan program. In the third quarter of PY2012, there appeared to be increased interest in the housing rehabilitation loan program. However, interest tapered in 2013. Actions to maintain progress to address this obstacle include:

a) Continue to provide program information to community organizations to share with their clientele. This will include email updates to our community organizations and printed materials.
b) Continue direct mailings to new homeowners in the target areas. New homeowners are identified through the Assessment Office which provides information to staff regarding recent home sales.
c) Continue direct mailings to property owners that have been contacted by the Code Enforcement Officer for the City of Fond du Lac regarding code violations for exterior building maintenance (roofing, porches, etc).

2) Another obstacle continues to be the lagging/poor economic conditions. While the number of foreclosures has declined over the last few years, home sales continue to lag compared to pre-2008 levels. Repayments to the revolving loan funds have stabilized between PY2012 and PY2013 with approximately $120,000 to $130,000 in repayments. While revolving funds have increased over previous years, they are still lagging behind previous levels. Actions to address this obstacle include:

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a) The City continues to supplement the Owner Occupied Rehabilitation Loan Program with grant funds. In previous program years, most of the funds for this program came from program income/repayment of rehabilitation loans. The PY2014 Annual Plan includes supplementing the revolving housing rehabilitation loan fund with PY2014 grant funds; however, the amount of supplemental grant funds have slowly decreased over the last two program years as the amount of program income/revolving funds continues to increase.

3) Another obstacle continues to be a lack of funding for all of the high priority needs. This includes not only lack of funding but loss of funding. In Fall 2012, ADVOCAP indicated that they would no longer be able to partner with the City of Fond du Lac and Redevelopment Authority for the use of HOME funds to assist with owner occupied housing rehabilitation. Since Entitlement Communities receive CDBG funds the State of Wisconsin felt it would be more effective to distribute HOME funds to those organizations that do not receive other federal funds, such as CDBG. Actions to address this obstacle include:

a) The RDA and staff will continue to assess potential projects against the priority needs and goals of the Consolidated Plan. A project that does not meet a priority need or poses a low impact on meeting those needs will not be funded.

b) Staff continues to investigate new funding opportunities for projects or activities, including grants and loans from the Wisconsin Department of Natural Resources and Wisconsin Economic Development Corporation (WEDC) and Department of Administration-Housing Division).

c) Staff routinely check's HUD's website for Grant Funds Available to see the City of Fond du Lac is eligible for any of the Notices of Funds Available and if the grant opportunity correlated to any identified needs or potential activity/project.

d) The City will supplement the revolving housing rehabilitation loan fund with PY2014 grant funds.

e) The RDA will continue to follow the Public Services Policy which requires new funding for Public Service activities to be evaluated based upon the presence of existing or similar programs; funding shall be focused on direct services to LMI populations rather than funding administrative costs and collaboration among community partners. This policy ensures the most effective uses of CDBG funds and avoids duplication of services.

Sources of Funds:

5. Identify the federal, state, and local resources the jurisdiction expects to receive to address the needs identified in the plan**. Federal resources should include Section 8 funds made available to the jurisdiction, Low-Income Housing Tax Credits, and competitive McKinney-Vento Homeless Assistance Act funds expected to be available to address priority needs and specific objectives identified in the strategic plan. (92.220(c)(1))**

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PY 2014 Action Plan Sources of Funds response:

In addition to the federal CDBG funds the City receives from HUD, the City intends to utilize the following federal, state and local resources:

1) The City of Fond du Lac's partnership with ADVOCAP for HOME funds ended in May 2013. However, the City will continue to support ADVOCAP's utilization of HOME funds within the community including making referrals to ADVOCAP as appropriate and receiving referrals from ADVOCAP.
2) The City will continue to utilize tax increment financing (TIF) where appropriate to encourage development and redevelopment in the City.
3) The City received Neighborhood Stabilization Program (NSP) funds as a subrecipient to ADVOCAP. The City sold the original NSP property in April 2012. The program income was used to rehab another NSP project in the community which was sold in April 2013. Program income from the sale has been used to acquire another property and staff hopes to complete rehabilitation by April 2014 to have the property ready for sale in late Spring 2014.
4) The Redevelopment Authority will continue to consider the possible acquisition and remediation of blighted properties in the City. In addition to Community Development Block Grant funds, staff looks at the viability of different brownfield/environmental remediation grants from Wisconsin Department of Natural Resources and Wisconsin Economic Development Corporation (WEDC) to assist with these types of projects.
    a. For example, during PY2013 the City was awarded a Brownfield Grant from WEDC to assist with redevelopment of the former Wells Manufacturing site on Brooke Street.
    b. WEDC announced a new Community Development investment Program Grant in Summer 2013. The City is looking at two (2) potential projects for this grant opportunity which would be submitted for consideration in 2014.
5) In addition to State of Wisconsin grant programs, staff will look at the viability of applying for Assessment, Revolving Loan Fund, or Cleanup Grant funds from the Environmental Protection Agency (EPA). As Community Development Block Grant fund allocations change, it is essential that the City and staff continue to look for new and different funding opportunities to compliment current efforts, such as brownfield remediation.
6) The City will continue to collaborate with developers on Low-Income Tax Credit projects in the City.
7) In 2012, Community Development Financial Institutions Fund (US Department of Treasury) identified two (2) Census Tracts that would be eligible for New Market Tax Credits (NMTC). This is a new financing mechanism to encourage redevelopment and reinvestment with the heart of the City of Fond du Lac. Staff and community partners, such as Fond du Lac County Economic Development Corporation (FCEDC) and Downtown Fond du Lac Partnership (DFP), will work together to assist developers and other entities interested in redevelopment opportunities apply for NMTC with an eligible Community Development Entity (such as Wisconsin Housing and Economic Development Authority – WHEDA).

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8) The City of Fond du Lac contributes $478,797 in local funds to the Community Development Department. The Community Development Department is responsible for implementing the CDBG program and meeting the goals.
9) The Fond du Lac Housing Authority receives funds for their Section 8 voucher program and other funds for the maintenance and operation of the public housing supply within the City.
10) ADVOCAP is the lead agency in the Continuum of Care and distributes homeless funds, such as Emergency Shelter Grants, to other organizations such as Solutions Center. In addition, ADVOCAP receives funds under the Supportive Housing Program (SHP).
11) Salvation Army, Solutions Center and St. Vincent De Paul are key resources within the community that provide assistance to individuals that are homeless or at risk of becoming homeless through private donations/grants, in-kind services, and other grant programs. Assistance is provided in the form of rental and/or utility assistance as well as low-cost goods.

6. If you plan to dedicate funds within a local targeted area, provide the boundaries of the targeted area and an estimate of the percentage of funds you plan to dedicate to target area(s). (91.220(f))

PY 2014 Action Plan Sources of Funds response:
The City strives to allocate at least 51% of CDBG housing rehabilitation funds to block groups that contain 51% or more low-and-moderate income (LMI) persons. The boundaries of the targeted area are provided on an attached map.

However, the ability to meet that goal is based upon receiving housing rehabilitation loan applications from income-eligible households. The impact of the struggling economy on the City over recent years has lead to more income-eligible households outside some the targeted LMI block groups.

7. If your plan includes a Neighborhood Revitalization Strategy Area or Areas, please identify the census tracts for each NRSA and an estimate of the percentage of funds you plan to dedicate to the NRSA(s).

PY 2014 Action Plan Sources of Funds response:
The 2014 Annual Action Plan does not include a Neighborhood Revitalization Strategy Area.

8. Explain how federal funds will leverage resources from private and non-federal public sources.

PY 2014 Action Plan Sources of Funds response:
The City leverages resources from private and non-federal public resources in the following ways:

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1) The Homestead Opportunity Program provides a vacant lot to a non-profit homebuilder such as Habitat for Humanity or ADVOCAP's Fresh Start Program. Habitat for Humanity provides the labor and materials to construct a new single-family home which is estimated to be valued at 2-3 times the value of the CDBG funded lot. In addition to the sweat equity, the organization receives private donations from organizations and individuals within the community and also undertakes various fundraising efforts in support of their activities.
2) The Housing Rehabilitation Revolving Loan Program for rental property owners requires property owners to utilize either their private funds or obtain a "traditional" loan through a lender to cover the costs of rehabilitation work in non-LMI units.
3) The Economic Development Revolving Loan Fund (EDRLF) requires a 50/50 match for every loan dollar a business applicant receives as part of the City's loan program. In addition to the job creation/retention, the City also sees private investment in economic development projects.
4) The City will continue to work with non-profit community partners to help fund various public service projects, such as Boys & Girls Club, Solutions Center, Dental care Assistance and Help at Home. The CDBG assistance received by these organizations is used to compliment the private donations, grants and other public and private funds they receive in support of these programs. The community is able to see increased or new services without a single entity bearing the full cost.
    a. For example, the City provided $20,000 in funding for the Dental Care Assistance Program for low-and-moderate income adults. This funding resulted in approximately $22,000 of in-kind contributions from the dental community.
5) The Emergency Shelter Grants and Supportive Housing Program funds received by ADVOCAP, Solutions Center, Salvation Army and other community partners are used to compliment grants, such as United Way, and other fundraising efforts that are used by these organizations.

9. Provide a description of how matching requirements of HUD's programs will be satisfied.

PY 2014 Action Plan Sources of Funds response:
The federal CDBG program does not require a match.

10. If the jurisdiction deems it appropriate, indicate publicly owned land or property located within the jurisdiction that may be used to carry out the plan.

PY 2014 Action Plan Sources of Funds response:
The City of Fond du Lac does not intend to use publicly owned land in this plan.

Managing the Process

11. Identify the significant aspects of the process, by which the plan was developed, and the agencies, groups, organizations, and others who participated in the process.

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PY 2014 Action Plan Managing the Process response:

1) As described in the Citizen Participation Plan, the City encourages residents to attend the public hearings where needs, potential activities/projects as well as plan approval are discussed. To foster participation, the City publishes notices in English in the Fond du Lac Action Advertiser, a general circulation newspaper distributed to all households, including low-and-moderate income households. The notices are placed on the City's website, Fond du Lac Public Library, Fond du Lac Police Department and City of Fond du Lac Notices/Agenda board outside the City Clerk's office. The notices include a statement in Hmong and Spanish, the predominate non-English languages within the community, inviting non-English speakers to attend and that interpreters are available upon request. In addition, these notices include a special invitation to the disabled community offering to make accommodations as needed to assure them the opportunity to communicate their input concerning CDBG and the Consolidated Plan.
2) The PY2014 Annual Action Plan is built off the PY2012-2016 Consolidated Plan and the needs identified through input and feedback from different groups and organizations in the community including the Housing Coalition, Fond du Lac Housing Authority Resident Council and the River Park Neighborhood group (formerly Hamilton Area Neighborhood District). Those identified needs were re-evaluated for PY2014 through further discussions with the Housing Coalition/Continuum of Care; Housing Authority and River Park Neighborhood group (formerly Hamilton Area Neighborhood District).
3) As part of the outreach process, staff sends a copy of the hearing notice to the City's community partners along with an email with a brief description and purpose of the program as well as encouraging them to attend the meeting, contact staff with questions, submit concerns or identify needs if they are unable to attend the meeting.

12. Describe actions that will take place during the next year to enhance coordination between public and private housing, health, and social service agencies.

PY 2014 Action Plan Managing the Process response:
1) The City of Fond du Lac Community Development Department staff will continue to network with the Fond du Lac Housing Coalition at monthly meetings. The Housing Coalition is comprised of multiple nonprofit organizations that deal with housing, health and social service needs. Staff will provide quarterly updates on Community Development Department activities, specifically Community Development Block Grant activities, to these agencies during the meetings. In addition, the Coalition meetings provide an opportunity for staff to learn and be aware of the existing programs and new initiatives that are being undertaken by community partners to meet the needs of the community.

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2) As a member of the Housing Coalition, staff will encourage collaboration among the representatives of various housing, health and social service agencies through participation in or support of any multi-agency grant funding applications, such as the Emergency Shelter Grants and identifying opportunities where CDBG funds may support new activities and/or help improve or expand activities that meet CDBG national objectives. Staff also currently serves as Secretary for the Housing Coalition.

a. Other agencies and representatives are encouraged to participate in the Housing Coalition as either ongoing contributors or occasional presenters of pertinent information/services that would benefit the overall efforts of the Housing Coalition. Recently, Fond du Lac County Community Programs started to attend meetings. The Family Resource Center, Forward Services Corporation and Center for Veterans Issues have done presentations for the Coalition members. Staff will continue to assist with identifying new and relevant speakers/agency to attend and/or present information to the Housing Coalition.

3) Staff will resume the quarterly CDBG newsletter that was started in the 4th quarter of 2011 as a means of sharing information regarding the CDBG program/activities with community partners. The quarterly newsletter is distributed to community partners that include members of the Housing Coalition, but also to those on the housing providers support list that include housing, health and social service agencies. For example, the ARC of Fond du Lac which provides housing and social service support to individuals with developmental disabilities and the United Way.

4) Staff will continue to attend monthly meetings of the River Park Neighborhood group (formerly Hamilton Area Neighborhood District). The meetings are also attended by local residents, landlords, Fond du Lac Housing Authority, City of Fond du Lac Code Enforcement, City of Fond du Lac Police Department and a local church. River Park discusses current issues facing the neighborhood and opportunities to address those concerns through multi-agency collaboration. The River Park neighborhood area has been a historically low and moderate income area that is seen increased reinvestment over the last several years.

6) As part of the Needs Assessment and planning process for the Annual Action Plan, staff encourages organizations to communicate and collaborate on activities. With limited funding available for Public Service activities, the Redevelopment Authority discourages funding of duplicative efforts in order to ensure effectiveness and efficiency. If an organization requests funding for a new activity or project and staff is aware that a similar activity or effort is in place, staff will encourage those organizations to collaborate on those efforts before submitting a funding request.

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Citizen Participation (91.220(b))

13. **Provide a description of the process used to allow citizens to review and submit comments on the proposed consolidated annual plan, including how the plan (or a summary of the plan) was published for review; the dates, times and locations of a public hearing, or hearings; when and how notice was provided to citizens of the hearing(s); the dates of the 30 day citizen comment period, and if technical assistance was provided to groups developing proposals for funding assistance under the consolidated plan and how this assistance was provided.**

    PY 2014 Action Plan Citizen Participation response:
    The Annual Action Plan was prepared following input at a "needs" public hearing held on October 15, 2013. A second public hearing was held January 9, 2014 to adopt the final Annual Action Plan.

    1) Extensive outreach was made including a public notice advertisement on September 29, 2012 and December 15, 2013 in the Fond du Lac Action Advertiser, a general circulation newspaper distributed to all households, including low-and-moderate income households. The notices were placed on the City's website, Fond du Lac Public Library, Fond du Lac Police Department and City of Fond du Lac Notices/Agenda board outside the City Clerk's office. The notices were emailed to representatives from the Housing Coalition in addition to a Housing Providers list (a database of approximately 50 individuals/organizations that have expressed interest in the CDBG program).
    2) Three (3) days prior to the public hearing, a follow-up email was sent to the Housing Providers network to encourage attendance and seek feedback.
    3) The public comment period was held open from October 15, 2013 until November 16, 2013. Additional comments received during this period were submitted to the RDA at their November 19, 2013 meeting. The final needs assessment, reflecting public comments received by staff, for the Annual Action Plan were presented to the RDA at the January 9, 2013 meeting for adoption.
    4) The PY2014 Annual Action Plan is built off the PY2012-2016 Consolidated Plan and the needs identified through input and feedback from different groups and organizations in the community including the Housing Coalition, Fond du Lac Housing Authority Resident Council and the River Park Neighborhood group (formerly Hamilton Area Neighborhood District). Those identified needs were re-evaluated for PY2014 through further discussions with the Housing Coalition/Continuum of Care; Housing Authority and River Park Neighborhood group (formerly Hamilton Area Neighborhood District).
    5) The PY2014 Annual Action Plan was made available on the City's website (www.fdl.wi.gov) and at the Community Development Department during normal business hours.

14. **Provide a summary of efforts made to broaden public participation in the development of the consolidated annual plan, including outreach to minorities and non-English speaking persons, as well as persons with disabilities.**

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PY 2014 Action Plan Managing the Process response:

Efforts made to broaden public participation included:

1) The PY2014 Annual Action Plan is built off the PY2012-2016 Consolidated Plan and the needs identified through input and feedback from different groups and organizations in the community including Housing Coalition, Fond du Lac Housing Authority Resident Council and the River Park Neighborhood group (formerly Hamilton Area Neighborhood District). Those identified needs were re-evaluated for PY2014 through further discussions with the Housing Coalition/Continuum of Care; Housing Authority and River Park Neighborhood group (formerly Hamilton Area Neighborhood District).
2) Hearing notices include statements in Spanish and Hmong.
3) As part of the outreach process, staff sends a copy of the hearing notice to the City's community partners along with an email with a brief description and purpose of the program as well as encouraging them to attend the meeting, contact staff with questions, submit concerns or identify needs if they are unable to attend the meeting. In previous program years, a copy of the notice was sent to community partners with little detail or explanation. For the October 15, 2013 needs hearing, the RDA had two (2) individuals sign in to speak or ask questions and four (4) others that did not sign in but came to attend the meeting. The City's community partners serve various populations, including minorities, non-English speaking persons and persons with disabilities.

15. Provide a summary of citizen comments or views on the annual plan.

PY 2014 Action Plan Managing the Process response:

The Redevelopment Authority and staff received several comments at the October 15, 2013 Public Hearing to identify needs for the PY2014 Annual Action Plan.

Diane Wojcik, ARC of Fond du Lac, indicated that there is a need for housing units for clients with developmental disability issues. She stated that they now have a waiting list for these types of units. She inquired about availability of grant funding to assist with housing rehabilitation. Benson stated a meeting with staff could be scheduled for further discussion.

Tanisha Alvardo indicated that she feels there is a need for more handicapped accessibility throughout the City. She stated that many businesses have handicapped parking, however they have no or limited handicapped accessibility within the building. She also inquired about the need to establish more youth programs within the City. Benson reviewed that youth programs are supported by community partners. Alvarado also stated that Fond du Lac is a growing minority community with the need for more minority owned businesses.

The Redevelopment Authority and staff received several comments at the January 9, 2014 Public Hearing to identify needs for the PY2014 Annual Action Plan.

Insert comments for January meeting

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16. Provide a written explanation of comments not accepted and the reasons why these comments were not accepted.

*Please note that Citizen Comments and Responses may be included as additional files within the CPMP Tool.

PY 2014 Action Plan Managing the Process response:
All comments were accepted at the October 15, 2013 public hearing and January 9, 2014 public hearing as well as during the 30-day comment period.

Staff met with a representative of ARC Housing, Inc. after the October public hearing. They inquired about the need to assist with housing for the developmentally disabled. The representative stated that they have a waiting list for the apartment units they manage and would like assistance with purchasing additional units. Staff reviewed options and presented information to the RDA in November 2013.

Institutional Structure

17. Describe actions that will take place during the next year to develop institutional structure.

PY 2014 Action Plan Institutional Structure response:
The City of Fond du Lac's institutional structure includes the City of Fond du Lac Redevelopment Authority; Community Development Department staff; ADVOCAP, Inc.; Fond du Lac Economic Development Corporation (FCEDC); Downtown Fond du Lac Partnership (DFP); Fond du Lac Housing Coalition (COC) and program subrecipients.

1) The City of Fond du Lac Community Development Department will continue to administer the owner occupied and renter occupied residential rehabilitation loan programs (internal structure). The Redevelopment Planner, Community Development Specialist and Rehabilitation Specialist will continue to meet monthly to discuss current and pending loan applications/projects, issues that need to be addressed and other questions or concerns.
2) The City will continue to develop and improve a means of educating and increasing awareness among the City's institutional structure partners about the programs offered by the City. Staff will send out quarterly email updates regarding the programs to help promote the City's programs to their clients (external structure to support internal programs).

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3) The City of Fond du Lac operates its housing and community development efforts primarily through the Redevelopment Authority (RDA) and Fond du Lac Housing Authority (HA). The Commissioners of both public agencies are appointed by the City Council and include representatives of private industry, non-profit organizations, and public institutions. Although independent entities, there is collaboration between organizations. Staff from the Community Development (which supports the RDA) and Housing Authority both participate in the Housing Coalition (COC) and River Park Neighborhood group. Staff from both entities communicate by email and/or telephone weekly on a wide variety of issues and topics, including grant opportunities, community needs, and funding challenges. In addition, the two entities often partner and collaborate on other grant opportunities, such as CDBG-EAP from the Wisconsin Department of Commerce which provided funding for the renovation of Calumet Apartments (internal structures).
4) Publicly assisted housing developments will continue to be reviewed through consultations between Community Development and Housing Authority staff. Staff of both agencies meet bi-annually to discuss current concerns regarding public housing developments, demand versus supply and opportunities for improvements (amenities, new programs, public improvements).
5) Another significant agency is ADVOCAP, Inc., the local Community Action Agency. ADVOCAP takes a lead role in the community's homeownership programs. In addition to participating as members the Housing Coalition (COC), the City and ADVOCAP have partnered on other grant opportunities, including the Neighborhood Stabilization Program (NSP) and HOME program. While the City is no longer an eligible subrecipient of HOME funds, the City will continue to support ADVOCAP in their HOME grant applications ands collaborate with them where possible on other projects.
6) Community Development staff will report on the progress towards goals outlined in the Consolidated Plan as part of their involvement in the Fond du Lac Housing Coalition (COC).
7) Fond du Lac Economic Development Corporation (FCEDC) and Downtown Fond du Lac Partnership (DFP) will continue to be active participants in the City's economic development efforts. Staff collaborates with the FCEDC and DFP to identify economic development opportunities and determine the appropriate use of funding, such as CDBG funds, FCEDC's Loan Program or DFP's programs. This collaboration is achieved through participation on various Boards and subcommittees (external structure/external support).
8) The City will continue to work with subrecipients to implement programs that meet the goals of the Consolidated Plan. These are programs that help low-and-moderate income families, the homeless and individuals at risk for becoming homeless. These subrecipients include the Boys & Girls Club of Fond du Lac which provides after school programs for low-and moderate-income children/teens and Fond du Lac County Health Department which provides a Dental Care Assistance program for low-and-moderate income adults; and Solutions Center which provides services and shelter for homeless persons.
9) The Fond du Lac Housing Coalition (COC) will conduct periodic reviews of the community needs assessment to ensure continued focus on the most urgent housing and employment needs of the community. This has become more essential within the past year as the State COC's submit grant applications for funding and changes to funding structures as a result of regulatory changes (e.g. Hearth Act – definition of homeless, etc.)

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10) Staff will continue to attend training seminars or participate in training webinars, such as Environmental Review elements, when possible. This training reinforces staff understandings of the program requirements and contributes to overall compliance.

Monitoring

18. Describe actions to be taken that will take place during the next year to monitor your performance in meeting goals and objectives set forth in your Consolidated Plan.

PY 2014 Action Plan Monitoring response:

1) As data is recorded in IDIS, an ongoing monitoring of actions and results takes place by Community Development and City Administration staff.
    a. Recent changes in IDIS will result in an increased monitoring by staff of activities to ensure that accomplishments are recorded in a timely manner, activities are completed and closed out and funds are expended in a timely fashion.
2) In addition to the IDIS tracking of progress to goals, a monthly financial report is prepared that identifies allocated funds, funds expended, funds committed and balances.
3) The financial report is presented and reviewed by the Redevelopment Authority. If acceptable, the RDA approves the financial reports.
4) As part of the financial reports, staff identifies "pipeline" projects that will utilize uncommitted funds to assist in meeting the goals and objectives of the Consolidated Plan.
5) Subrecipients enter into an Agreement with the Redevelopment Authority to receive CDBG funds. As part of the Agreement, the Subrecipient is required to submit either monthly or quarterly reports regarding progress towards goals. Monthly reports are required for those subrecipients that submit monthly reimbursement requests for funds expended on the program and quarterly reports are required for those subrecipients that submit quarterly reimbursement requests. Prior to approving the reimbursement request, staff verifies progress toward the program goals and that the expenditure of funds is consistent and appropriate with the CDBG requirements and conditions of the Agreement.
6) Staff will conduct annual or quarterly on-site monitoring visits with each subrecipient to review progress reports, documentation and progress towards goals. The frequency of the on-site monitoring will be determined by the Subrecipient and progress toward goals. For Subrecipients that are making timely progress towards goals and reimbursement reports are consistent with the proposed activity application and Subrecipient Agreement, than an annual on-site inspection may be appropriate. Subrecipients that are late with reports and slow to expend funds are candidates for quarterly on-site monitoring.

19. Describe steps/actions to be taken during the next year to ensure compliance with program requirements, including requirements involving the timeliness of expenditures.

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PY 2014 Action Plan Monitoring response:
1) Staff from the City's Community Development and Administration departments that are involved with the CDBG program will continue to monitor the timeliness of expenditures on a regular basis through financial reports, IDIS and funding requests.
2) Monthly financial reports are prepared, presented and approved by the RDA, and staff members managing the program are responsible for knowing how much and when to spend.
3) Staff will work to continue to improve reporting in IDIS, specifically program income and revolving loan funds. Previous reports to HUD and comments from HUD staff have indicated inconsistent data between the reporting of program income in IDIS and that reported in the CAPER.
4) Staff promptly reviews all funding requests and "pipeline" projects to determine eligibility for CDBG funding and presents the project at the next RDA meeting to ensure timely review and turnaround of projects.
5) Staff will continue to enter each approved project into IDIS which requires documentation that the activity meets certain program requirements.
6) Staff will continue to prepare a memorandum for each project file that outlines how each project meets a national objective and activity.
7) Community Development Department staff review all HUD communication, including e-mails which also provide updates and information on grantee progress. HUD communications that provide updates on the status of each community's timeliness of expenditures are presented to the RDA to ensure that the City's program is in compliance. Staff attends HUD sponsored training to keep abreast of regulatory changes.
8) Subrecipient agreements include time lines for activity expenditures and program requirements. Subrecipients are required to provide monthly or quarterly reports with reimbursement requests. Monthly or quarterly reimbursements ensure that funds are expended in a timely fashion and that program requirements are being met by each activity.
9) Staff will meet with subrecipients onsite quarterly as needed to ensure that program requirements are being met and that progress is being made towards program goals.
10) Staff is working on improving internal monitoring of the Housing Rehabilitation Loan Program, specifically the expenditure of loan funds and progress by contractors. In PY2012, the lack of housing rehabilitation loan applications, delayed expenditures and delayed progress all contributed to the failure to meet the timeliness ratio. Staff has been working to address all of these issues, including the internal monitoring of progress on Housing Rehabilitation Loans to insure timely expenditures and progress on the work items.

20. **Describe steps/action you will use to ensure long-term compliance with housing codes, including actions or on-site inspections you plan to undertake during the program year**.

PY 2014 Action Plan Monitoring response:
1) The City has an ongoing Housing Code Enforcement program that responds to complaints on a regular basis and follows up until compliance is achieved.

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a. The Code Enforcement Officer provides a monthly report to the Community Development Director that identifies the number of complaints filed within a month's time period; number of initial inspections; number of follow-up inspections; number of violations found and number of violations cured. This report is distributed to City Council and staff by the City Manager. The report includes a running total of code enforcement efforts over the course of a year.
b. The Code Enforcement Officer also refers property owners that have received a housing code complaint/violation to the Housing Rehabilitation Loan Program.

2) The Building Inspection Division works with the City Attorney to identify legal corrective actions for those property owners that fail to comply with the housing code. These efforts include citations to attain compliance with housing code which may lead to appearance in municipal court. For properties that have failed to achieve compliance, a Raze or Repair or Raze Order may be issued.
3) The City's Code Enforcement Officer attends the River Park Neighborhood group (formerly Hamilton Area Neighborhood District) monthly meetings. The monthly meetings provide an opportunity to identify problem properties and update local residents on the City's efforts to achieve long-term compliance in this neighborhood.
4) The City's Rehabilitation Specialist meets with each rehabilitation loan applicant (owner occupied and renter occupied) to review the work they would like to have done as well as any work that is needed to correct any housing code issues/concerns. If the loan amount is insufficient to cover the scope of work the applicant would like to have completed, priority is given to those items that correct code violations and health/safety issues (e.g. lead based paint).
5) The Housing Rehabilitation Loan Program Guidelines and Procedures require that a property owner that receives a housing rehabilitation loan to properly maintain the property/structure. Failure to comply may result in default of the housing rehabilitation loan.

21. Describe actions to be taken to monitor subrecipients (including sponsors or administering agents) during the next program year. This includes the monitoring of all programs, CDBG, HOME, ESG, or HOPWA, as applicable.

PY 2014 Action Plan Monitoring response:
Collaboration with subrecipients is a relatively new component of the City's efforts to achieve the goals of the Consolidated Plan.
1) Potential subrecipients complete an application/funding request to identify program goals and conformance with CDBG national objectives.
2) Staff will meet with each potential subrecipient prior to completing the application/funding request to review program expectations and eligibility. This ensures that not only are activities eligible under the CDBG guidelines, but that they have the internal capacity to administer the funds as a subrecipient. This can be challenging for new organizations that may not have the internal framework in place to track expenditures, receipt of funds and use of funds (e.g. staff time). Staff will then encourage these new organizations to collaborate with existing organizations to act as a mentor agency to assist with their framework or to partner on a funding request.

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3) The Redevelopment Authority reviews each funding request. Staff provides information on available funding sources and how the proposed activity meets a goal of the Consolidated Plan.
4) Once a funding request is approved by the RDA, staff will meet with the subrecipient again to review CDBG requirements in more detail, the standard form of Agreement, reimbursement procedures and monitoring visits.
5) Approved subrecipients enter into an Agreement with the RDA which outlines the program requirements, goals and timeline for completion/expenditure of funds. The agreement includes information regarding income limits (income by household size in order to qualify as LMI) as well as the required reimbursement request form and progress report form.
6) Prior to receiving reimbursement for funds expended, the subrecipient will submit either a monthly or quarterly progress report. The progress report includes information regarding number of and demographics of the population group served by the activity and detail of how the funds were expended. Staff will review each reimbursement request to verify progress towards the goals and appropriate and consistent use of the funds compared to the Agreement.
7) Staff will conduct quarterly or annual on-site monitoring visits to review progress reports, on-site documentation, and any questions/concerns (City or Subrecipient). Staff will document the results of those monitoring visits.
8) Community Development staff monitor the recipients of the owner occupied and renter occupied rehabilitation loan. The Rehabilitation Specialist conducts on-site inspections of the work as it is being completed and verifies completion prior to releasing payment to the contractor. For the renter occupied rehabilitation loans, in addition to the work performed by the Rehabilitation Specialist, the Community Development Specialist verifies tenant income for the required monitoring period of the loan. To ensure that the recipient complies with program requirements post-loan closing, staff verifies receipt of property insurance which provides an indication on whether the recipient continues to maintain the home as their primary residence.
9) The Fond du Lac Economic Development Corporation (FCEDC) administers the City's Economic Development Revolving Loan Fund (EDRLF) which was established and funded when the City was a recipient of Small Cities CDBG funds, prior to becoming an entitlement community. Within this program there are two opportunities for monitoring: a) EDRLF loan recipients and b) FCEDC as the loan administrator.

a) Monitoring of the EDRLF loan recipients –

- FCEDC will contact staff regarding possible EDRLF applicants to discuss if they meet the eligibility requirements.
- Staff will complete the Environmental Review for each EDRLF loan application.
- The FCEDC will staff the Revolving Loan Fund (RLF) Committee which is comprised of various financial and business leaders within the community. FCEDC staff prepares a loan summary report that includes underwriting criteria and financials for the RLF Committee. They review and approve each EDRLF loan application.

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- In compliance with the EDRLF Manual and Loan Agreement, the loan recipient will submit reports regarding job creation, including LMI job creation and income verification to FCEDC. FCEDC staff reviews payrolls to verify employment and track job creation against those goals outlined in the Loan Agreement.
- Loan recipients that are unable to meet job creation goals will be submitted to the RLF Committee to review the application of penalties for failing to comply with EDRLF and CDBG requirements.

b) Monitoring of the FCEDC as loan administrator –

- The FCEDC will continue to provide quarterly reports to the RDA regarding loan approvals and status of loan repayments.
- Staff will meet quarterly with FCEDC staff to review progress towards LMI job creation goals, overall/total job creation and expenditure of EDRLF funds.
- Staff will accompany FCEDC on at least one (1) monitoring visit to oversee FCEDC's monitoring of the EDRLF Program. Additional on-site visits may be conducted based upon the type and number of EDRLF loans issued during the Program Year.

Description of Activities

***If not using the CPMP Tool:** Complete and submit Table 3C*
If using the CPMP Tool: Complete and submit the Projects Worksheets and the Summaries Table.*

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

PY 2014 Action Plan Description of Activities response**:**

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

Please see the attached Summaries Tables and Project Worksheets that outline the eligible activities that will occur during PY 2014.

Summary of Specific Annual Objectives and Outcome Measures

***If not using the CPMP Tool:** Complete and submit Table 2C and Table 3A.*
If using the CPMP Tool: Complete and submit the Summary of Specific Annual Objectives Worksheets or Summaries.xls*

23. Provide a summary of specific objectives that will be addressed during the program year. (91.220(c)(3)

PY 2014 Action Plan Summary of Specific Annual Objectives response:
(Use of the Summaries Table and Project Worksheets or Table 3C/2A will be sufficient. No additional narrative is required.)

Please see the attached Summaries Tables and Project Worksheets that outline the eligible activities that will occur during PY 2014.

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24. Describe the Federal Resources, and private and non-Federal public resources expected to be available to address priority needs and specific objectives during the program year.

    PY 2014 Action Plan Summary of Specific Annual Objectives response:

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

    Please see the attached Summaries Tables and Project Worksheets that outline the eligible activities that will occur during PY 2014.

    The primary funding source as indicated in the Summary Tables and Project Worksheets is CDBG allocations.

25. **Describe the outcome measures for activities in accordance with Federal Register Notice dated March 7, 2006, i.e., general objective category (decent housing, suitable living environment, economic opportunity) and general outcome category (availability/accessibility, affordability, sustainability). 91.220(e)**

    PY 2014 Action Plan Summary of Objectives/Outcomes response**:**

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

    Please see the attached Summaries Tables that outline the outcome measures for the proposed eligible activities that will occur during PY 2014.

HOUSING

Annual Affordable Housing Goals (91.220(g))

***If not using the CPMP Tool:** Complete and submit Table 3B Annual Housing Completion Goals.*
**If using the CPMP Tool:* Complete and submit the Table 3B Annual Housing Completion Goals.*

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

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PY 2014 Action Plan Annual Affordable Housing Goals response:
The City's housing goals are reflected in the Housing Needs tables and include owner and renter occupied housing rehabilitation, homeownership opportunities and public housing.

In summary:

- Housing rehabilitation
  - Owner occupied – 15 units; 15 households; 36 non-homeless individuals
  - Renter occupied – 2 units; 2 households; 2 non-homeless individuals ***(subject to availability of funding through program income)***
- Homeownership (typically non-homeless)
  - New single-family construction (Homestead Opportunity Program- Habitat for Humanity) – 2 units; 2 households; 8 individuals
  - Foreclosure rehabilitation (Neighborhood Stabilization Program Funds & CDBG Funds) – 1 unit; 1 household; 3-4 individuals
- Special needs
  - 2 transitional housing units owned and managed by ADVOCAP will be rehabilitated – 2 units; 2 households; 6 individuals

Needs of Public Housing (92.220(b))

27. Describe the manner in which the plan of the jurisdiction will help address the needs of public housing and activities it will undertake during the next year to encourage public housing residents to become more involved in management and participate in homeownership.

PY 2014 Action Plan Needs of Public Housing response:
1) Community Development and Housing Authority staff meet frequently to review the needs of public housing, specifically: availability of units (number and type) versus demand as well as rehabilitation and public facility needs. Where possible, CDBG or other grant funds will be used to help meet the needs identified by staff.
2) Community Development and Housing Authority staff will continue to identify opportunities to collaborate on grant applications to help meet the needs of public housing. In the past, the CDBG-EAP grant that supported the renovation of the Calumet Apartments, increasing the number of accessible units, is an example of that collaboration. A potential future collaboration could include a WHEDA Foundation Grant that could be used to improve accessibility at other Housing Authority sites.
3) The resident council, GrandRosaWest, reviews and has input on administrative policies that affect the residents.
4) The Housing Authority does not have a homeownership program but does refer tenants that have a desire for homeownership to local credit counseling services to help with financial management or to ADVOCAP, Inc for their homeownership program. In addition, the Housing Authority promotes homeownership by distributing information regarding home purchasing to tenants and voucher recipients. For example, ADVOCAP has a home for sale and the Housing Authority sent out copies of the home sale flier with their monthly distribution.

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5) The Consolidated Plan and Annual Action Plan include support for public services that may be used by residents of public housing developments. The housing rehabilitation program helps to conserve the affordable housing stock within the community. This housing stock will most likely become the viable homeownership opportunities for residents of public housing.
6) The City received Neighborhood Stabilization Program (NSP) funds to acquire and rehabilitate a foreclosed home. The home was sold in April 2012. Program income was used to rehab another property and provide downpayment assistance. The home was sold in April 2013. The program income was used to acquire a third property which will have the rehabilitation completed in Spring 2014. This will provide an additional homeownership opportunity.

28. If the public housing agency is designated as "troubled" by HUD or otherwise is performing poorly, the jurisdiction shall describe the manner in which it will provide financial or other assistance in improving its operations to remove such designation during the next year.

PY 2014 Action Plan Needs of Public Housing response:
The Fond du Lac Housing Authority is not a "troubled" agency.

Antipoverty Strategy

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

PY 2014 Action Plan Antipoverty Strategy response:
1) The City will continue the Economic Development Revolving Loan Fund (EDRLF) which is administered by the Fond du Lac County Economic Development Corporation (FCEDC). Job creation is a component of this program and FCEDC reports jobs created to the City of Fond du Lac and to the RDA in quarterly reports. The number of jobs created/retained is based upon the dollar value of the loan. The job creation will then be reported in IDIS.
2) The City continues to operate and market modern industrial and business parks that provide the land and infrastructure for new or existing businesses to expand. The City sold two (2) lots in 2013 in local business parks.
3) Staff will continue to increase awareness of financial incentives to businesses, including the State's Economic Development Tax Credit program and other low interest loan programs through close association and collaboration with FCEDC.
4) Staff will continue to provide outreach and referral/networking services for technical assistance to new and existing businesses including State of Wisconsin programs (Customized Labor Training grant program Business Employees' Program-BEST, etc.) and technical assistance services from the FCEDC.

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5) Staff will identify potential opportunities to collaborate with the Small Business Development Center (SBDC). The SBDC is located at the University of Wisconsin-Oshkosh but serves a seven county area, including Fond du Lac County. Their services include counseling for existing business and assisting start-ups. Both of these services will help foster economic development within the community which will lead to job creation.
6) The City will continue to operate the Fond du Lac Area Transit System which provides access to jobs and services to a broad range of households. According to the Transit Division, there was an 11% increase in ridership from 2010. The 2009 Transit Development Plan collected demographic information on individuals using the transit service and found that 69% do not have access to a car; 81% either do not have a license or are unable to drive; and 45% do not have access to other transportation options.
7) Staff will continue to collaborate with the Fond du Lac Housing Coalition to meet the needs of homeless individuals; individuals at-risk of becoming homeless and low income individuals. Each organization that comprises the Housing Coalition works to reduce poverty. Some agencies represented at the Housing Coalition provide rent and/or utility assistance (amounts vary based on the agency's available funds); food pantry/food assistance; counseling (family, employment, and financial); employment training; transportation assistance; and education (GED) assistance. Through these programs, the Housing Coalition works to help empower individuals to obtain stable housing and employment.
8) Staff will enforce the LMI job creation requirements if CDBG funds are used to assist a for-profit organization or if funds are used for other activities that use job creation as a basis for meeting CDBG requirements.
9) The City will continue its partnership with the Fair Housing Council and expand the role of the Equal Opportunities Commission to ensure that local fair housing ordinances are explained and enforced. This will reduce the impact of discrimination against various protected classes as they work to escape poverty.

Barriers to Affordable Housing

30. Describe the actions that will take place during the next year to remove barriers to affordable housing.

PY 2014 Action Plan Barriers to Affordable Housing response:
1) Staff will continue to recommend amendments to the Comprehensive Plan and rezoning applications where such amendments and rezonings provide opportunities for affordable housing.
2) Staff will continue to work with developers to facilitate the development of affordable housing through support of Low Income Tax Credit Project Proposals and Tax Increment Finance Districts in blighted areas.
3) The City offers the ability to rezone to a planned unit development type of regulatory structure based on the principles of Traditional Neighborhood Design (TND).
4) The City's Zoning Code permits developers the opportunity to build on smaller lots (up to 20% of residential lots) so that smaller homes can be built, providing opportunities for affordable single-family residential new construction.

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5) The City will continue to support the provision and construction of multi-family housing. This is evidenced by the fact that over 1/3 of the housing stock in the community is multi-family.
6) The City will continue to support Habitat for Humanity by donating vacant residential lots to the organization for construction of new single-family homes for low-and moderate-income families. The City donates two (2) lots per year depending upon the availability of viable lots.
7) The City will continue to fund the owner-occupied and renter-occupied housing rehabilitation program. This program provides opportunities for individuals to undertake rehabilitation projects and help preserve and maintain some of the existing affordable housing stock.
8) Staff will continue to partner with other non-profit organizations to develop affordable housing. The City partnered with ADVOCAP to be a subrecipient of their Neighborhood Stabilization Program (NSP) grant. As a NSP subrecipient, the City acquired and rehabilitated a foreclosed property. Program income from the sale of the property will be used to help fund an additional affordable housing opportunity.
9) Due to the continued problems in the housing market, Fond du Lac County continues to acquire parcels due to tax foreclosures. Staff is working with Fond du Lac County to encourage other communities to undertake affordable housing projects, such as the City's Homestead Opportunity Program which acquires lots for donation to Habitat for Humanity. The City will continue to provide information to the County Treasurer's office about program set-up and funding sources. These efforts will try to increase affordable housing opportunities in other areas of the County.

31. Describe the actions that will take place during the next year to foster and maintain affordable housing.

PY 2014 <u>Action Plan Barriers to Affordable Housing response:</u>
1) The owner-occupied and renter-occupied housing rehabilitation program will continue to be a high priority activity. This program provides the opportunities to maintain and preserve the existing affordable housing stock within the City.
2) The City will continue to collaborate with the Fond du Lac Housing Authority to maintain the affordable public housing. The Fond du Lac Housing Authority has a 5-Year Capital Fund Campaign which outlines the various improvements planned for each development. Staff will work with the Housing Authority to identify projects where CDBG funding may be appropriate, such as public street improvements.
3) The Community Development staff will continue to foster working relationships with developers to identify areas for development/redevelopment of new affordable housing as well as support for those projects through developer utilization of low income tax credits.

a. A developer has completed construction on a LIHTC residential development on a former underutilized commercial site.

4) The City received a Neighborhood Stabilization Program (NSP) grant through a partnership with ADVOCAP. The City purchased and rehabilitated a foreclosed home that was sold in April 2012. The program income from the sale was used to create another affordable housing unit and was sold in April 2013. The program income was used to acquire a third property which will be rehabilitated in Spring 2014.

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5) The Redevelopment Authority will continue the partnership with Habitat for Humanity and ADVOCAP's Fresh Start program through the Homestead Opportunity Program. This program provides a vacant buildable lot for construction of a new, single-family home for a low-and-moderate income household.
6) The River Park Neighborhood group (formerly Hamilton Area Neighborhood District) indicated that the increasing number of rental properties (no longer owner-occupied), specifically duplexes, has impacted the neighborhood over years. Staff is in the early stages of looking at ways to increase affordable homeownership opportunities with owner-occupied duplexes, including potential partnerships with other non-profits in the community and private property owners.

Lead-based Paint

32. Describe the actions that will take place during the next year to evaluate and reduce the number of housing units containing lead-based paint hazards in order to increase the inventory of lead-safe housing available to extremely low-income, low-income, and moderate-income families, and how the plan for the reduction of lead-based hazards is related to the extent of lead poisoning and hazards.

PY 2014 Action Plan Lead-based Paint response:
1) The City questions each applicant for the residential rehabilitation loan program to determine if there are children (under the age of 6) present in the home. If the answer is "yes", staff requests whether a lead assessment has been done on the child/children. If a lead assessment has not been done, staff directs the applicant to have a lead assessment completed through their health care provider or through the Fond du Lac County Health Department.
2) The City of Fond du Lac owns an advanced XRF machine, a Niton XL 309. This product enables the City's Rehabilitation Specialist to perform a full lead inspection as part of his regular housing rehabilitation survey inspection. The Rehabilitation Specialist is trained to operate the Niton and also is a licensed risk assessor/lead inspector/supervisor by the State of Wisconsin.
3) Deteriorated painted surfaces found that contain lead are treated in accord with "lead safe work practices". If necessary, occupants are temporarily relocated, and rehab work is performed by trained and licensed lead abatement contractors.
4) With each rehabilitation project, the City will continue to remove lead-based paint hazards and increase lead-safe housing inventory. The income eligibility requirements and tenant income monitoring ensure that these units are available to low- and moderate- income families.
5) The Housing Rehabilitation Loan Program Guidelines and Procedures may allow the RDA to approve a loan application up to 120% of the debt-to-value ratio for properties located within target area and for health/safety concerns. Lead-based paint hazards has been a basis for granting a loan at a higher level.
6) The City's Building Inspection Division will notify the Housing Rehabilitation Specialist when a home is found to have peeling paint or other lead risk must be remediated.

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7) The City continues to acquire lots through the Homestead Opportunity Program for donation to Habitat for Humanity. Habitat for Humanity works with low- and moderate- income family to construct a new single-family home on the lot donated under the Homestead Opportunity Program. The new construction provides a low-and moderate-income family with a lead-safe housing and adds lead-safe house to the overall housing stock.
8) The City will continue to work with Salvation Army on their Permanent Supportive Housing Program. The City is currently rehabbing a single-family home to donate to Salvation Army to use in their PSH Program. The home will be used as part of the PSH Program with the possibility of transitioning a LMI household from rental to homeownership over a period of time. The City will continue to identify properties that are feasible for rehabilitation and donation to Salvation Army. Prior to donation to the Salvation Army, the City rehabs the existing structure which includes addressing any lead based paint hazards.

HOMELESS

Specific Homeless Prevention Elements

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

33. Please describe, briefly, the jurisdiction's plan for the investment and use of available resources and describe the specific planned action steps it will take over the next year aimed at eliminating chronic homelessness by 2012. Again, please identify barriers to achieving this.

    PY 2014 Action Plan Specific Homeless Prevention response:
    Historically, the Fond du Lac area has minimal chronic homelessness population based on reports of homeless service providers in the area. Organizations participating in the Fond du Lac Housing Coalition have seen an increased demand for services as overall economy has continued to struggle and employers continue to reduce their workforce or close their doors.

    Housing Coalition and other community partners are the primary agents undertaking steps to eliminating chronic homeless while the City plays a supporting role. The City's investment is targeted at Solutions Center with specific planned actions using funds to increase accessibility/availability of services.

    1) ADVOCAP, along with Solutions Center, Salvation Army and other community partners will continue to implement the Point in Time Surveys bi-annual (January and July). These PIT surveys are essential to tracking the chronic homeless and provide the basis for data submitted as part of the Consolidated Plan and Annual Plans.

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2) The City will continue to support extending the hours at the warming shelter which is operated by Solutions Center at 51 West Division Street in addition to the two (2) permanent homeless shelters. The warming shelter is operated from November 1 through April 30 from 8:00 p.m. to 8:00 a.m. and has a capacity for 16 persons. Individuals that are chronically homeless often use the warming shelter during the winter season. These individuals typically refuse the services of the permanent shelters. By extending the hours of operation, staff will have the opportunity to offer additional time for supportive services/case management and provide shelter during a portion of the day.
3) Solutions Center provides services to homeless clients including AODA referrals, assistance in development of employment skills, securing employment and/or social services, etc. As part of the Annual Action Plan, the City would provide utility assistance to Solutions Center so that their resources can be most effectively used for client supportive services, including the chronic homeless.
4) ADVOCAP operates a Supportive Services Program through Emergency Shelter Grant funds. In order to be eligible to participate in the program, an individual must be homeless; be at or below 30% CMI and have a desire to participate in the program. Case workers help individuals identify barriers to housing and employment as well as help them develop an individualized plan for overcoming those obstacles.
6) ADVOCAP offers 12 units of transitional housing that helps move individuals into a stable housing environment by providing housing on a rent scale while continuing to provide supportive services. This provides the next step in the process after individuals that are chronically homeless receive services through the homeless or warming shelter and are ready to move out of homelessness. At the end of the transition period, the individuals are able to obtain and maintain housing independently. ADVOCAP is funded, in part, by ESG and SHP funds.
7) St. Vincent DePaul, Salvation Army and Church of Peace will continue to provide rent, utility and food assistance as resources permit. This assistance is critical to individuals that are just moving out of homelessness and those individuals who are at risk to become homeless.
8) The City of Fond du Lac, Fond du Lac County Economic Development Corporation (FCEDC), Association of Commerce, and Downtown Fond du Lac Partnership are working together to attract new businesses to the community and encourage business expansion to create jobs. Through job creation, individuals can obtain stable employment and increased income and are better positioned to move out of chronic homelessness with the aid of continued supportive services.
9) Fond du Lac County Community Programs, in addition to the State of Wisconsin, are the agencies primarily responsible for AODA treatment within the community. Housing Coalition agencies, including Catholic Charities and HOPE Mentoring, attempt to provide counseling and mentoring to assist individuals maintain compliance with individual plans. The Fond du Lac County-Veterans Services provides support for veterans in need that are homeless.

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10) The City will continue to work with Solutions Center to find new or improve activities and programs to assist individuals that are homeless. For example, the City assisted Solutions Center with the acquisition of a family shelter. Previously, homeless families are separated between the two shelters. The separation causes additional stress on families, specifically children, in an already stressful situation. In addition, the City funded the installation of an ADA accessible ramp at the Men's Shelter to ensure that all individuals would have access to the facility.

Barriers to Eliminating Homelessness

1) The continuing economic and housing conditions have made it more difficult for individuals to find stable employment and maintain housing. These conditions have increased the need and demand for services.
2) The continuing economic conditions have also impacted charitable contributions. Solutions Center, St. Vincent DePaul, Salvation Army, and Church of Peace depend upon charitable donations to supplement any grant funding they may receive each year. With limited resources/assistance, these organizations may be unable to serve all individuals in need which may result in individuals returning to homelessness.
3) The individuals that represent the chronic homeless population within the City often face challenges in maintaining compliance with their support plans, i.e., not complying with AODA plans. In addition, nonprofit community partners may not be able to assist these individuals if they are unable to maintain compliance. Therefore, individuals either remain homeless or return to being homeless over a period of time.

34. Homelessness Prevention—The jurisdiction must describe its planned action steps over the next year to address the individual and families with children at imminent risk of becoming homeless.

PY 2014 Action Plan Specific Homeless Prevention response:

1) The City will continue to support ADVOCAP and their community partners (Solutions Center, Salvation Army) in their applications for ESG and SHP grants. These grants provide the primary means of support for the supportive services to help individuals at risk of becoming homeless.
2) The City will continue to work with Solutions Center to identify opportunities to provide funding assistance so that their financial resources can be most effectively used to assist individuals and families at risk of becoming homeless. Current funding assistance initiatives include:

a. Utility assistance for operation of the shelters – The CDBG assistance for utility costs enables Solutions Center to direct their limited resources towards other efforts, such as case management.
b. Motel vouchers - Motel vouchers are utilized when the shelters are at capacity or if the shelter is not an appropriate place for a family due to the size or composition of the family.
c. Extended hours at the warming shelter – The warming shelter is often used by individuals that are chronically homeless who have refused services through the permanent shelters. The extended hours provides an opportunity to assist these individuals with case management or other supportive services.

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3) The City continues to be actively involved in the Fond du Lac Housing Coalition (COC). The Housing Coalition is comprised of different non-profit and governmental entities that provide services to homeless individuals, individuals at risk for becoming homeless and low-and-moderate income individuals. Through monthly agency presentations, each organization learns about the services and assistance available to their clients. The Coalition continues to discuss means of improving the internal organization of the group through subcommittees that could focus on key issues/challenges (e.g. Point in Time surveys) as well as increasing the visibility of the organization through website, brochures and other outreach efforts.
4) The Housing Coalition has indicated that the homeless and at risk of being homeless populations are changing and that more teens are seeking services. The Coalition invited the McKinney-Vento/HEARTH Act representative from the Fond du Lac School District to attend the monthly meetings. Their participation in the committee will highlight the issues and challenges facing teenagers that are homeless or at risk of being homeless.
5) The City will continue to encourage the use of the Economic Development Revolving Loan Fund (EDRLF) for businesses looking to locate or expand within the City. The EDRLF requires that jobs are created and are made available to low-and-moderate income individuals. Increased job opportunities create more opportunities for individuals to secure employment that will enable them to support themselves and their families.
6) ADVOCAP provides different employment & training programs, including skills enhancement, working with displaced workers and work experience programs with local employers. These programs provide opportunities for individuals to build and develop skills that will enable them to find stable employment.
7) Salvation Army, St. Vincent De Paul, and Church of Peace will continue to provide food, rent and utility assistance to individuals in need subject to availability of resources and donations.

35. Discharge Coordination Policy—The jurisdiction must certify it established a policy for discharge of persons from publicly funded institutions or systems of care (such as health care facilities, foster care, or other youth facilities, or correction programs and institutions) in order to prevent such discharge from immediately resulting in homelessness for such persons. (91.225 (c)(10))

    PY 2014 Action Plan Specific Homeless Prevention response:
    Fond du Lac has a Discharge Coordination Policy that is implemented by the local hospital, nursing and other health care facilities as well as by the Taycheedah Correctional Facility. The City of Fond du Lac as an organization does not receive any McKinney-Vento Homeless Assistance Act Emergency Shelter Grant (ESG), Supportive Housing, Shelter Plus Care, or Section 8 SRO Program funds so this reporting does not certify that it has established a policy for discharge of persons from publicly funded institutions.

Emergency Shelter Grants (ESG)

36. If applicable, describe how the ESG matching requirements will be met.

    PY 2014 Action Plan ESG response:
    Not applicable.

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37. (States only) Describe the process for awarding grants to State recipients, and a description of how the allocation will be made available to units of local government.

    PY 2014 Action Plan ESG response:
    Not applicable.

NON-HOMELESS SPECIAL NEEDS HOUSING

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

***If not using the CPMP Tool:** Complete and submit Table 1B.*
If using the CPMP Tool: Complete and submit Needs Table/Non-Homeless Needs.*

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

    PY 2014 Action Plan Non-homeless Special Needs response:

    1) The City will continue to support the rehabilitation of Public Housing units/developments, such as the Calumet Apartment complex (through a Wisconsin Department of Commerce CDBG-EAP grant). Public housing is often a primary housing opportunity for individuals with non-homeless special needs. Rehabilitation projects ensure that Public Housing developments meet the needs of those individuals, such as accessibility and mobility.
    2) Fond du Lac County Health Care Center provides several housing options to meet the special needs housing demand including:
    a) Island Harbor provides housing for individuals with chronic mental illness.
    b) Sunrise and Sunset Harbors provide housing for the elderly.
    c) Snug Harbor provides housing and services for individuals that require secure facilities.
    3) The Fond du Lac Housing Coalition (COC) discusses the need for special needs housing as part of their overall goals. As the needs emerge within the community, the organizations that comprise the COC are able to identify those needs and gaps and determine what activities are necessary to assist those individuals. The Salvation Army's Permanent Supportive Housing effort was a result of such an effort.
    4) The City will continue to maintain a list or Summary of Assisted Care and Affordable Housing. This resource lists all of the assisted care and affordable housing developments within the City as well as the eligibility requirements and/or client base for their facility. This resource is available on the City's website and can be used by families and individuals with non-homeless special needs.
    5) The City will work with ARC Housing, Inc over the next program year to identify opportunities to increase their housing supply to meet the needs of persons with developmental disabilities, such as acquisition of a tax foreclosed duplex and assistance with rehabilitation to donate to ARC Housing for additional units.

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COMMUNITY DEVELOPMENT

Community Development Block Grant

***If not using the CPMP Tool:** Complete and submit Table 2B, Table 1C Summary of Specific Objectives.*
If using the CPMP Tool: Complete and submit the Needs Worksheets/Non-Housing Community Development and Summary of Specific Annual Objectives Worksheets or Summaries.xls*

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

    PY 2014 Action Plan Community Development response:
    The City's Annual Action Plan for PY2014 includes allocation of $336,000 for activities that will directly benefit low-and-moderate income persons. These activities include the Housing Rehabilitation Loan Program; Homestead Opportunity Program; Boys & Girls Club After-School & Summer Programs; Help at Home for the Elderly; Dental Care Assistance for Adults; Mentoring; Homeless Shelter Utility Assistance; and Warming Shelter Extended Hours.

    The Blight Elimination and Public Facilities Program also may benefit low-and-moderate income persons (versus SBA/SBS) depending upon the type of project undertaken.

    The Housing and Community Development Activities worksheet provides further detail by Program Year regarding the proposed allocation of CDBG funds.

40. CDBG resources must include the following in addition to the annual grant:

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

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

PY 2014 Community Development response:
The City estimates $120,000 will be generated in program income during the plan year.

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

PY 2014 Community Development response:
No funds are expected to be generated from float funded activities.

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

PY 2014 Community Development response:
All program income received has been included in a statement or plan.

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

PY 2014 Community Development response:
Not applicable. The City of Fond du Lac has not participated in any Section 108 activities.

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

PY 2014 Community Development response:
Not applicable. The City of Fond du Lac does not have any surplus funds from the above mentioned activities.

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

PY 2014 Community Development response:
Not applicable.

41. ☒ NA If a jurisdiction intends to carry out a new CDBG float-funded activity, the jurisdiction's plan must include the following information:

f. For the program income included in 1(b) above, the jurisdiction should identify the month(s) and year(s) in which the program income will be received; and which of the following options it will take for each float-funded activity to address the risk that the activity may fail to generate adequate program income:

i. amend or delete activities in the amount equal to any amount due from default or failure to produce sufficient income in a timely manner. (If this option is chosen, the action plan must include a description of the process it will use to select activities to be amended or deleted and how it will involve citizens in that process), OR

ii. obtain an irrevocable line of credit from a commercial lender for the full amount of the float-funded activity. (If this option is chosen, information on the float-funded activity in the action plan must include the lender and the terms of the irrevocable line of credit), OR

iii. agree to transfer general local government funds to the CDBG line of credit in the full amount of any default or shortfall within 30 days of the float-funded activity's failure to generate projected program income on schedule.

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PY 2014 Community Development response:
Not applicable as the City has no float funded activity.

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

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

    PY 2014 Community Development response:
    Please see Community Needs Table for PY2014 non-housing community development needs.

    1) Housing Rehabilitation Loan Program
        i. Who may apply: LMI homeowner within the City of Fond du Lac; preference given to individuals residing within the designated LMI target areas; Landlord with 1-4 units of which 51% are LMI tenants.
        ii. Process: Interested individual completes a loan application that is reviewed by staff and RDA for conformance with the Housing Rehabilitation Loan Program Manual.
        iii. How much & terms: zero (0%) percent interest for LMI homeowners with deferred loan not to exceed $24,999; Landlords may receive loans at 0% to 4% interest not to exceed $24,999 and $5,000 for each additional rental unit with repayment started within 6 months.
    2) Blight Elimination
        i. Who may apply: Used by Department of Community Development
        ii. Process: Staff identifies vacant, abandoned, blighted or contaminated properties
    3) Public Facilities
        i. Who may apply: Used by Department of Community development to assist with Public Works projects
        ii. Process: Staff works with Engineering/Public Works staff to identify eligible projects that either benefit low-and-moderate income persons or neighborhoods or blight elimination.
    4) Homestead Opportunity Program
        i. Who may apply: Used by Department of Community Development

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ii. Process: Staff identifies vacant, tax foreclosed or deteriorated properties throughout the City for acquisition and donation to Habitat for Humanity or ADVOCAP. Funds may also be used by the City for acquisition and rehabilitation of foreclosed properties that are then sold to income eligible homebuyers.

iii. How much & terms: New single-family homes must be occupied by LMI household. Rehabbed homes sold by the City must be sold to an LMI homebuyer.

42. Identify specific long-term and short-term community development objectives (including economic development activities that create jobs), developed in accordance with the statutory goals described in section 24 CFR 91.1 and the primary objective of the CDBG program to provide decent housing and a suitable living environment and expand economic opportunities, principally for low- and moderate-income persons.

(Use of Table 2B or the Community Development Needs Table and Summaries Table is sufficient, additional narrative is not required)

Please see the attached Community Development Needs Tables and Summaries that outline the eligible activities that will occur during PY 2014.

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

PY 2014 Community Development response:
No urgent need activities are proposed for this application.

HOME/ American Dream Down payment Initiative (ADDI)

☒ **NA**

44. Describe other forms of investment not described in § 92.205(b).

PY 2014 Action Plan HOME/ADDI response:
Not applicable.

45. Describe how HOME matching requirements will be satisfied?

PY 2014 Action Plan HOME/ADDI response:
Not applicable.

46. If the participating jurisdiction (PJ) will use HOME or ADDI funds for homebuyers, it must state the guidelines for resale or recapture, as required in § 92.254 of the HOME rule.

PY 2014 Action Plan HOME/ADDI response:

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Not applicable.

47. Describe the policy and procedures the PJ will follow to affirmatively market housing containing five or more HOME-assisted units.

    PY 2014 Action Plan HOME/ADDI response:
    Not applicable.

48. Describe actions to be taken to establish and oversee a minority outreach program within the jurisdiction to ensure inclusion, to the maximum extent possible, of minority and women, and entities owned by minorities and women, including without limitation, real estate firms, construction firms, appraisal firms, management firms, financial institutions, investment banking, underwriters, accountants, and providers of legal services, in all contracts, entered into by the PJ with such persons or entities, public and private, in order to facilitate the activities of the PJ to provide affordable housing under the HOME program or any other Federal housing law applicable to such jurisdiction.

    PY 2014 Action Plan HOME/ADDI response:
    Not applicable.

49. ☒ **NA** If you intend to use HOME funds for Tenant-Based Rental Assistance, describe the local market conditions that led to the use of the HOME funds for a tenant-based rental assistance program.

    PY 2014 Action Plan HOME/ADDI response:

50. ☒ **NA** If the TBRA program will target or provide preference for a special needs group, identify that group from the Consolidated Plan as having an unmet need and show that the preference is needed to narrow the gap in benefits and services received by that population?

    PY 2014 Action Plan HOME/ADDI response:

51. ☒ **NA** If the PJ will use HOME funds to refinance existing debt secured by multifamily housing that is that is being rehabilitated with HOME funds, it must state its refinancing guidelines required under § 92.206(b). The guidelines shall describe the conditions under which the PJ will refinance existing debt. At a minimum these guidelines must:
    a. Demonstrate that rehabilitation is the primary eligible activity and ensure that this requirement is met by establishing a minimum level of rehabilitation per unit or a required ratio between rehabilitation and refinancing.
    b. Require a review of management practices to demonstrate that disinvestments in the property has not occurred; that the long-term needs of the project can be met; and that the feasibility of serving the targeted population over an extended affordability period can be demonstrated.
    c. State whether the new investment is being made to maintain current affordable units, create additional affordable units, or both.
    d. Specify the required period of affordability, whether it is the minimum 15 years or longer.

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e. Specify whether the investment of HOME funds may be jurisdiction-wide or limited to a specific geographic area, such as a neighborhood identified in a neighborhood revitalization strategy under 24 CFR 91.215(e)(2) or a Federally designated Empowerment Zone or Enterprise Community.
f. State that HOME funds cannot be used to refinance multifamily loans made or insured by any federal program, including CDBG.

PY 2014 Action Plan HOME/ADDI response:

52. ☒ **NA** If the PJ is going to receive American Dream Down payment Initiative (ADDI) funds, please complete the following narratives:
    a. Describe the planned use of the ADDI funds.
    b. Describe the PJ's plan for conducting targeted outreach to residents and tenants of public housing and manufactured housing and to other families assisted by public housing agencies, for the purposes of ensuring that the ADDI funds are used to provide down payment assistance for such residents, tenants, and families.
    c. Describe the actions to be taken to ensure the suitability of families receiving ADDI funds to undertake and maintain homeownership, such as provision of housing counseling to homebuyers.

    PY 2014 Action Plan HOME/ADDI response:

Housing Opportunities for People with AIDS ☒ NA

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

53. Provide a Brief description of the organization, the area of service, the name of the program contacts, and a broad overview of the range/ type of housing activities to be done during the next year.

    PY 2014 Action Plan HOPWA response:

54. Specify the one-year goals for the number of low-income households to be provided affordable housing using HOPWA funds for short-term rent, mortgage, and utility payments to prevent homelessness; tenant-based rental assistance, units provided in housing facilities that are being developed, leased, or operated.

    PY 2014 Action Plan HOPWA response:

55. Please describe the expected trends facing the community in meeting the needs of persons living with HIV/AIDS and provide additional information regarding the administration of services to people with HIV/AIDS.

    PY 2014 Action Plan HOPWA response:

56. Identify the method for selecting project sponsors (including providing full access to grassroots, faith-based and other community organizations).

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PY 2014 Action Plan HOPWA response:

57. Please note any evaluations, studies or other assessments that will be conducted on the local HOPWA program during the next year.

PY 2014 Action Plan HOPWA response:

Other Narrative

Include any Action Plan information that was not covered by a narrative in any other section.

Fair Housing

Analysis of Impediments (AI)
The City of Fond du Lac adopted an update to the Analysis of Impediments (AI) in January 2011. A copy of the AI is attached for reference.

The AI looked at identifying impediments to fair housing through different areas including: zoning/public policies; public housing; property tax policies; planning/zoning boards; sale of subsidized housing; building codes; unlawful real estate advertising; lending policies; and housing discrimination. The AI did not identify any impediments to fair housing in many of the areas mentioned above. However, that is not to say that impediments do not exist.

The following impediments will be the focus of the City's efforts for PY2014:

1) Education and outreach to individuals
    a. The lack of fair housing complaints submitted to the City's Equal Opportunities Commission (EOC) ***does not*** demonstrate that fair housing violations are not occurring. It suggests that individuals are either unaware of their rights under the Fair Housing Act and/or are unaware of the opportunity to submit their complaint to the Equal Opportunity Commission (or contact staff with a question or concern before submitting a complaint).
    b. The City of Fond du Lac will continue the partnership with the Fair Housing Council to improve education and outreach in the community. Outside of the efforts of the Fair Housing Council, staff will continue to look for ways to enhance the Fair Housing/Equal Opportunity website (located under Community Development on the City's website www.fdl.wi.gov).
2) Education and outreach to landlords
    a. There is need for education and outreach for landlords regarding their responsibilities under the Fair Housing Act. It is highly probable that landlords focus only on race or disability as it relates to fair housing and are not educated on the other protected classes, such as individuals with children.
    b. The decline in the housing market and increased foreclosures creates opportunities for entrepreneurial individuals to purchase property at a lower price and become landlords. These "mom-and pop" landlords probably have never been educated on fair housing practices.

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Therefore, continuing education and outreach to landlords is always needed.

c. The Community Development Department, Fond du Lac Housing Authority, Fond du Lac Police Department and UW-Extension Fond du Lac held a landlord training seminar/workshop in June 2013 that included a presentation from Fair Housing Council. Staff will work with these agencies regarding another workshop/seminar in 2014.

d. The City will continue the partnership with Fair Housing Council to improve education and outreach to landlords in the community.

3) Staff will continue to monitor new zoning codes/ordinances and public policies adopted by the City to determine if there will be any impact on fair housing practices or affordable housing.

Affirmatively Furthering Fair Housing

In addition to addressing impediments as a means to affirmatively further fair housing, the City's efforts will also include:

1) Develop an education and outreach campaign regarding fair housing for both residents and landlords that will reach a diverse population.
   a. In PY2012, staff met with the Community Development Educator for UW-Cooperative Extension, Fond du Lac County, to review and identify new opportunities for outreach and collaboration. Staff will continue to implement the outreach opportunities identified in conjunction with UW-Extension. In addition, staff will continue to collaborate with UW-Cooperative Extension to update new opportunities for outreach and identify new organizations and individuals within the community for those outreach efforts.
   b. The City contracted with the Fair Housing Council to provide services and assistance to the City of Fond du Lac for PY2013. The City will continue that partnership in PY2014.
2) Education and outreach materials will be developed/provided in English, Spanish and Hmong, the predominate languages within the community.
3) Continue to support and promote the Fair Housing Essay and Poster contest.
   a. To acknowledge the efforts by youth in the community that participate in the contest, the Equal Opportunities Commission will host an awards presentation for the local Fair Housing essay and Poster contest winners.
   b. To acknowledge those individuals that place in the State-level competition, those individuals will be acknowledged at a City Council meeting. Both the Equal Opportunities Commission and City Council acknowledgement aim to further promote Fair Housing in the community.
4) Continue to support projects that include the development or rehabilitation of accessible housing (e.g. the renovation of Fond du Lac Housing Authority's Calumet Apartments through CDBG-EAP grant that increased the number of accessible units and the construction of LIHTC accessible housing units with City funds). Staff will work to identify/collaborate on a project that may be eligible for a WHEDA Foundation Grant.
5) Continue to support development of affordable housing throughout the City.
6) Staff will continue to identify opportunities to become involved with organizations and individuals that serve people that are often the target of housing discrimination, such as the Hispanic/Latino Advisory Leadership Group.

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