

**Program Year 2022
Consolidated Annual Performance and Evaluation Report (CAPER)**



**Community Development Block Grant
U.S. Department of Housing and Urban Development**

**City of Fond du Lac
Department of Community Development
June 2023**

CR-05 - Goals and Outcomes

Progress the jurisdiction has made in carrying out its strategic plan and its action plan. 91.520(a)

This could be an overview that includes major initiatives and highlights that were proposed and executed throughout the program year.

Progress towards goals continued to be significantly (and surprisingly) impacted by the COVID19 pandemic. While PY2021 saw the return of many activities, the expected continued steady progress towards "normal" in PY2022 did not happen as anticipated by staff. The Housing Rehabilitation Loan Program continued to be impacted by the availability of contractors and the cost of materials. This, along with continued reduced interest in the Program as residents waited to see what would happen with inflation, COVID19, and the (crazy) housing market impacted the City's ability to assist low and moderate income homeowners. Public Service partners struggled to fill open positions and saw the departure of people in leadership roles. City staff spent a significant amount of effort helping to navigate these challenges, seek out of the box solutions and focus on building capacity. Some agreements and funding continued to be delayed until City staff was confident that the community partners had the means and ability to meet the expectations of the CDBG program. The extension of funding through the CARES Program added additional demand on City staff to manage existing CDBG programs; understand, comply and rollout the CARES Funding and assist the community through a pandemic as part of City operations. In many ways, PY2022 posed new challenges than those experienced by PY2020 and PY2021 as staff had not expected ongoing challenges as the level experienced during the program year. Finally, the rollout of additional federal programs, such as the American Rescue Plan, added further strain onto City staff and will also be a factor in PY2023 as expectations and timelines for these other federal programs significantly impact smaller communities such as Fond du Lac.

Comparison of the proposed versus actual outcomes for each outcome measure submitted with the consolidated plan and explain, if applicable, why progress was not made toward meeting goals and objectives. 91.520(g)

Categories, priority levels, funding sources and amounts, outcomes/objectives, goal outcome indicators, units of measure, targets, actual outcomes/outputs, and percentage completed for each of the grantee's program year goals.

Goal	Category	Source / Amount	Indicator	Unit of Measure	Expected – Strategic Plan	Actual – Strategic Plan	Percent Complete	Expected – Program Year	Actual – Program Year	Percent Complete
Administration	Administration	CDBG: \$	Other	Other	1	0	0.00%			
After-School Educational Program	Non-Housing Community Development	CDBG: \$	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	300	0	0.00%			
Dental Care Assistance	Non-Housing Community Development	CDBG: \$	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	250	0	0.00%			
Downtown Improvements - Public Spaces	Non-Housing Community Development	CDBG: \$	Other	Other	35	0	0.00%			
Economic Opportunities- Job Creation/Retention	Economic Development	CDBG: \$ / Tax Increment Financing: \$	Jobs created/retained	Jobs	50	0	0.00%			
Eliminate Blight in LMI Neighborhoods	Non-Housing Community Development	CDBG: \$ / Tax Increment Financing: \$	Facade treatment/business building rehabilitation	Business	1	0	0.00%			

Eliminate Blight in LMI Neighborhoods	Non-Housing Community Development	CDBG: \$ / Tax Increment Financing: \$	Brownfield acres remediated	Acre	1	0	0.00%			
Eliminate Blight in LMI Neighborhoods	Non-Housing Community Development	CDBG: \$ / Tax Increment Financing: \$	Buildings Demolished	Buildings	1	0	0.00%			
Homeownership - Community Partners	Affordable Housing	CDBG: \$	Homeowner Housing Added	Household Housing Unit	12	0	0.00%			
Homeownership-City Rehabilitation	Affordable Housing	CDBG: \$	Homeowner Housing Rehabilitated	Household Housing Unit	5	0	0.00%			
Neighborhood Park Improvements - Hamilton	Non-Housing Community Development	CDBG: \$	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	Persons Assisted	450	0	0.00%			
Owner Occupied Housing Rehabilitation	Affordable Housing	CDBG: \$	Homeowner Housing Rehabilitated	Household Housing Unit	60	0	0.00%			
Renter Occupied Housing Rehabilitation	Affordable Housing	CDBG: \$	Rental units rehabilitated	Household Housing Unit	10	0	0.00%			

Summer Educational Program	Non-Housing Community Development	CDBG: \$	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	500	0	0.00%			
Supportive Services - Homeless	Homeless	CDBG: \$	Homeless Person Overnight Shelter	Persons Assisted	800	0	0.00%			
Warming Shelter - Homeless	Homeless	CDBG: \$	Overnight/Emergency Shelter/Transitional Housing Beds added	Beds	150	0	0.00%			

Table 1 - Accomplishments – Program Year & Strategic Plan to Date

Assess how the jurisdiction’s use of funds, particularly CDBG, addresses the priorities and specific objectives identified in the plan, giving special attention to the highest priority activities identified.

The City is committed to serving those individuals that are low and moderate income; special needs populations and those experiencing homelessness. The majority of activities undertaken by the City are specifically undertaken to address their needs, including the Housing Rehabilitation Loan Program (maintaining the City's affordable housing stock); Homestead Opportunity Program (affordable home ownership opportunities for income eligible buyers); and Public Services (after school & summer programs to support low and moderate income youth; funding to support those experiencing homelessness).

Despite the ongoing challenges, the City continued to work towards priorities. The additional funding through CARES Act was also directed to those areas. However, the ability to utilize the funds in the same manner (timing wise) was impacted by COVID19, staffing shortages and other obstacles.

CR-10 - Racial and Ethnic composition of families assisted

Describe the families assisted (including the racial and ethnic status of families assisted).

91.520(a)

	CDBG
White	111
Black or African American	12
Asian	0
American Indian or American Native	0
Native Hawaiian or Other Pacific Islander	0
Total	123
Hispanic	14
Not Hispanic	106

Table 2 – Table of assistance to racial and ethnic populations by source of funds

Narrative

The City added the demographics of the three (3) housing rehabilitation clients in the above data table. The table also does not reflect the additional 15 families that reported as Black & White (4) and Other Multiracial (11). The numbers also do not reflect the individuals served by the enhancements to Franklin Park that were reported under the LMA benefit. Census Tract/Block Group 407-1 serves approximately 2100 people that is a diverse neighborhood. A quick glance at the Census data shows 88 Native Hawaiian or Other Pacific Islander households; 36 Asian households; and 43 Black or African American households. The Public service activities appear to connect more readily with the diverse households within the community, such as the Boys & Girls Club. In the past, the Dental Care Program and Homeless Programs also served a diverse population base; however, the need for CDBG partnerships with those partner agencies declined during COVID19 as other funding streams became available. The City anticipates reconnecting with those partners as funding streams change. In terms of the housing rehabilitation loan program, the City works to reconnect with as many homeowners as possible. Advocap is another partner agency that offers housing rehabilitation support and local homeowners have another option to obtain financial support for home improvements.

CR-15 - Resources and Investments 91.520(a)

Identify the resources made available

Source of Funds	Source	Resources Made Available	Amount Expended During Program Year
CDBG	public - federal	733,330	
LIHTC	private	0	
Tax Increment Financing	public - local	0	

Table 3 - Resources Made Available

Narrative

The above "Amount Expended" was provided from the PR02 Report and does not include CDBG-CV funds. PY2022 was a challenge in implementation due to the amount of funding support available through other State and Federal Programs along with staffing challenges with community partners, capacity, availability of contractors and cost of materials. The City is cautiously optimistic that such efforts will continue to improve in PY2023 and beyond.

Identify the geographic distribution and location of investments

Target Area	Planned Percentage of Allocation	Actual Percentage of Allocation	Narrative Description
IMMEDIATE TARGET AREA			

Table 4 – Identify the geographic distribution and location of investments

Narrative

The Census Bureau, at the request of the U.S. Department of Housing and Urban Development, conducted an analysis of American Community Survey Data 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:

401-5	402-2	403-1	405-1	405-3	407-1
401-4	402-3	403-4	405-2	405-4	410-1

The City is looking forward to receiving updated information after the compilation of the 2020 Census to see what neighborhoods have changed since the 2010 Census.

The City 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. The information shows that the City is becoming a more demographically diverse population. The population of African- American, Hispanics, American Indian/Alaska Natives and individuals that identify with more than one race has slightly increased within the community since the 2000 Census. This increase in diversity is expected as part of a growing community that continues to increase economic opportunities, invest in decent housing and strive for a good quality of life. Overall concentrations of minorities are most pronounced in census tracts 403 and 405 with 4 of the 5 groups having concentrations in these census tracts.

The City intended to use the large majority of its funds within the census block groups that have high concentrations of LMI persons. This is the area of greatest need for housing rehabilitation, replacement of deteriorated public infrastructure, concentration of housing affected by lead paint, location of historic properties, location of concentration of minority groups, and other community development priorities. Although the target area is the area of greatest need, there is significant need in areas outside the target area. The City lends money from the owner-occupied rehabilitation program according to the availability of qualified applicants, which may not necessarily reside in those block groups that are identified as 51% or more low-and-moderate income. There are those CDBG investments that serve low-and-moderate income persons, such as the transit amenities, that cannot be solely based upon the block groups. The riders may be from these neighborhoods, but they are using transit to access shopping, services and employment.

Leveraging

Explain how federal funds leveraged additional resources (private, state and local funds), including a description of how matching requirements were satisfied, as well as how any publicly owned land or property located within the jurisdiction that were used to address the needs identified in the plan.

- The City's use of CDBG funds to assist Salvation Army with the warming shelter leveraged the funds they were currently receiving (ESG, United Way, etc) for their services as well as private donations (including volunteers hours and meals for the clients served by the warming shelter).
- The investment into the Boys & Girls Clubs programs leveraged foundation dollars and private corporate investments to support a new after-school program location and new summer program location.

CR-20 - Affordable Housing 91.520(b)

Evaluation of the jurisdiction's progress in providing affordable housing, including the number and types of families served, the number of extremely low-income, low-income, moderate-income, and middle-income persons served.

	One-Year Goal	Actual
Number of Homeless households to be provided affordable housing units	0	0
Number of Non-Homeless households to be provided affordable housing units	7	3
Number of Special-Needs households to be provided affordable housing units	1	0
Total	8	3

Table 5 – Number of Households

	One-Year Goal	Actual
Number of households supported through Rental Assistance	0	0
Number of households supported through The Production of New Units	0	0
Number of households supported through Rehab of Existing Units	7	3
Number of households supported through Acquisition of Existing Units	1	1
Total	8	4

Table 6 – Number of Households Supported

Discuss the difference between goals and outcomes and problems encountered in meeting these goals.

The ongoing residual impacts of the COVID19 pandemic, concerns about inflation & the economy and the housing market impacted progress towards the affordable housing goals, primarily the Housing Rehabilitation Loan Program. People were hesitant to take on any perceived new debt given talks about inflation and concerns about the economy (which impacts low and moderate income persons/households at a much more significant level). While staff started to see interest in the program again in late 2020 that never continued to grow into PY2021 and, subsequently in PY2022, as City staff

had anticipated (and hoped!). Contractor availability and the cost of materials, along with the ability to get materials, impacted outcomes. Staff is anticipating seeing slow progress in PY2023 as well as a result of similar challenges.

Discuss how these outcomes will impact future annual action plans.

It seems that unanticipated issues continue and impact the ability to predict program outcomes. Cost of materials and availability of contractors will impact future program years. Staff anticipates lowering goals on a short term basis until such time there is a better understanding of where the market is going for these goods and services and whether there are opportunities for staff to be able to identify alternatives. City staff has consulted with other formula grantees but many are experiencing similar challenges - contractor availability. The focus of many educational programs in the area is still on college versus technical college or the trades. As our smaller, family based contractors are aging out, they don't have a succession plan or interest in the business.

One of the newer challenges is staffing - filling existing positions and keeping them. This impacts contractors, community partners and even the City's ability to confidently work toward program goals.

Include the number of extremely low-income, low-income, and moderate-income persons served by each activity where information on income by family size is required to determine the eligibility of the activity.

Number of Households Served	CDBG Actual	HOME Actual
Extremely Low-income	0	0
Low-income	1	0
Moderate-income	2	0
Total	3	0

Table 7 – Number of Households Served

Narrative Information

PY2022 continued to be a challenge despite moving from pandemic to "normal.". The City saw interest in the Housing Rehab Program in Fall 2020 and anticipated a slow but consistent increase in loan activity into PY2021 and continued interest in PY2022. The City received inquiries and sent out applications, but many never returned the applications or staff phone calls regarding interest in the program. The few return calls staff did receive about not following through with the Program application was a desire not to take on any more debt as many assumed it was a grant program and not a loan program, despite staff's detailed explanation during the pre-qualification process. The City continued to send out letters to newer homeowners as well as target streets within various neighborhoods, but nothing resulted in moving from inquiries to solid loan applications. To be blunt, City staff was befuddled. The City will revisit goals for PY2023 and beyond and continue to work with other formula grantees to identify opportunities as well as local community partners to identify target markets for the program.

CR-25 - Homeless and Other Special Needs 91.220(d, e); 91.320(d, e); 91.520(c)

Evaluate the jurisdiction's progress in meeting its specific objectives for reducing and ending homelessness through:

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

PY2022 was a continued to be a modified collaboration of the Continuum of Care/Housing Coalition, St. Vincent De Paul, Solution Center, Salvation Army and the City to work and address the changing needs of those experiencing homelessness in the community. St. Vincent De Paul and Solution Center undertook a partnership to expand shelter capacity to serve families as well as singles experiencing homelessness. (The shelter opened early in PY2022!) The shelter has increased capacity for families and singles experiencing homelessness. The City continued to work with community partners to find an alternative location for the chronically homeless to go during the day.

The City was also anticipating kicking of the start of a year long Homeless Strategy. However, the COVID19 resulted in deferring the scheduling of that initiative due to restrictions on gatherings. The City and Continuum of Care/Housing Coalition agree that the creation of a Homeless Strategy will provide a long range guide for future collaborations and initiatives to address the various gaps and challenges facing this population. The COC remained meeting virtually in PY2021 and PY2022 and was not an appropriate time to invest in such an effort. The City hopes to restart this effort in PY2023/PY2024.

Addressing the emergency shelter and transitional housing needs of homeless persons

The City continued to work closely with the Salvation Army on the operation of the warming shelter - an essential service for those that are seeking emergency shelter. The Salvation Army was committed to operating the warming shelter program as well as working with the City to accommodate changing conditions. However, at the end of March 2023, Salvation Army announced it will no longer operate the warming shelter. City staff is working with United and other community, including faith based organizations, to work through possible options to provide this service in winter 2023.

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

The City of Fond du Lac relies on its community partners and other government agencies to address needs of low-income persons and families to avoid become homeless after being discharged from

publicly funded institutions and systems of care. The Fond du Lac RAP (Release Advance Planning) Team continued their efforts to focus on those individuals exiting the corrections system and provided updates during the Housing Coalition/Continuum of Care meetings. The Team is comprised of the County Jail, Health Department; local hospital (SSM/St. Agnes Hospital), Social Services and Community Programs. In addition, various nonprofit partners are also involved with the Team, including veterans groups, St. Vincent de Paul, Forward Services, Advocap, Solutions Center and the Housing Authority. The Team works together as individuals are exiting out of the corrections system to coordinate services and housing.

As part of the Annual Plan process, the City works with Public Service agencies on identifying needs in the community as well as funding gaps to address the needs of low-income persons and extremely low-income persons. The City's efforts at addressing those needs focus more on secondary needs and rely on community partners, such as Advocap, Fond du Lac Housing Authority and other nonprofits on primary needs. These primary needs include accessing housing options and housing costs (rent and utilities). In the past, the CDBG program had been used to support the Fondy Food Pantry to expand their services to be able to accommodate larger donations and increase the number of people served by the pantry. By supporting the Fondy Food Pantry through CDBG funds, the City supports access to food resources to individuals that may have limited incomes. Families and persons don't have to choose between feeding their family or paying rent.

The City provided funding support to the Boys & Girls Club of Fond du Lac for after-school and summer programs. These programs provide not only a safe and secure place for kids to go while their families are working, but provide additional educational support to ensure success in school. In order to break the cycle of poverty and income challenges, it is essential that children in these households have access to educational support so they can get a strong education and improve their access to employment opportunities as they age.

Through the Housing Rehabilitation Loan Program, the City provides loans to income eligible households to address housing quality standards and code violations. The program ensures that households are able to maintain their primary equity investment in good condition. If a household does not have sufficient equity to undertake the loan, the City works with them on other options to ensure that the required work can still be undertaken to preserve the home.

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

The Fond du Lac Area Housing Coalition, formed in 1990 as the Fond du Lac Coalition to End Homelessness, serves as the Continuum of Care (COC) for the County. The agencies (ADVOCAP,

Solutions Center and Salvation Army) within this group are the primary resource for directly assisting homeless persons make the transition to permanent housing and independent living.

As part of the Housing Coalition, the City continued to assist with providing housing opportunities through its Homestead Opportunity Program. The Homestead Opportunity Program facilitates the acquisition of empty residential lots and works with Habitat for Humanity to build new homes for low income individuals. Although this activity may not serve homeless persons directly, it provides affordable permanent housing to individuals who may not otherwise have an opportunity for homeownership and who may have transitioned from homelessness to supportive housing to independent living. All members of the Housing Coalition were extremely committed to help those in need.

In addition, a challenge that emerged was the availability of rental units to help place individuals/families moving out of homelessness. As home sale prices increased, landlords increased rental rates. As new rental units came on the market at higher rent rates, landlords that had offered what had been affordable rent increased their rental rates. Community partners worked one-on-one with individual and supportive landlords to place families in as many units as they could but the inventory struggled to meet demand.

CR-30 - Public Housing 91.220(h); 91.320(j)

Actions taken to address the needs of public housing

The City and Housing Authority staff have a close working relationship. Staff of both agencies work together in a number of areas, including the Housing Coalition/Continuum of Care; River Park Neighborhood group; landlord training; code enforcement efforts and others. Throughout COVID19 and the reopening, staff from both agencies worked together to keep each other informed on funding opportunities, regulatory requirements, public health guidelines and other topics in order to ensure both agencies were working in sync.

The Housing Authority staff undertakes routine inspection of their units to identify both short-term and long-term capital needs. As part of each Annual Action Plan process, the City meets with the Housing Authority to discuss upcoming public housing needs and what partnership opportunities exist to complete those projects.

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

The Fond du Lac Housing Authority has a resident council that includes representatives from Rosalind Apartments, Westnor Apartments and Grand Court Apartments. This council provides guidance to Housing Authority staff on proposed initiatives and programs as well as feedback policy changes. City staff also encourages public housing residents to participate in broader community initiatives, such as sending the Housing Authority upcoming openings on City Boards and Commissions and encouraging interested residents to serve on those committees that meet their interests.

The Housing Authority staff is very proactive and supportive of residents that continue to make improvements/advancements in employments and financial stability. For example, they share information and resources on financial programs, such as credit counseling, for those that may be able to move towards homeownership. Housing Authority staff makes referrals to Habitat for Humanity or Advocap for their homeownership opportunities. In addition, the City works with the Housing Authority to promote housing opportunities through the CDBG Program and/or Neighborhood Stabilization Program. The City utilizes these monies to rehabilitate homes and sell them to income eligible homebuyers. Once they are ready for sale, City staff notifies the Housing Authority and they share with residents that are potentially ready for homeownership.

Actions taken to provide assistance to troubled PHAs

The Fond du Lac Housing Authority is not a troubled PHA. Therefore, no actions were required to provide assistance.

CR-35 - Other Actions 91.220(j)-(k); 91.320(i)-(j)

Actions taken to remove or ameliorate the negative effects of public policies that serve as barriers to affordable housing such as land use controls, tax policies affecting land, zoning ordinances, building codes, fees and charges, growth limitations, and policies affecting the return on residential investment. 91.220 (j); 91.320 (i)

The City did not undertake any new public policies that would serve as barriers to affordable housing. City staff is diligent about reviewing proposed changes to the zoning ordinance and impacts it may have on residential investment. The Building Code is in compliance with the State Building Code. The City does not adopt policies or codes that are more restrictive than the State Building Code. The City has continually supported Housing Tax Credit (HTC) projects within the community, including the conversion of two manufacturing buildings into family apartments. City staff has actively encouraged the Wisconsin Housing and Economic Development Authority (WHEDA) to look at other opportunities for HTC investment because the qualified Census tracts and employment centers (such as the City's industrial parks) are not as close connected and the City has limited transit and other transportation options. Overall, compared to other communities within Fond du Lac County, the City has the largest percentage of rental units and continues to support multi-family development at all levels.

At the end of PY2021, the City adopted an amendment to the zoning code that created a Neighborhood Mixed Use District that would encourage the mix a residential and commercial uses in a number of areas within the community to help further connect affordable housing options near employment areas.

Actions taken to address obstacles to meeting underserved needs. 91.220(k); 91.320(j)

1.) While housing rehabilitation applications continue to pose a significant challenge during PY2022, the availability of contractors and cost of materials continues to be an obstacle to meeting underserved needs. Staff continued to:

- Worked with Inspections to identify new contractors working in the community.
- Collaborating with other formula grantees to identify creative ways of identifying eligible contractors.
- Continued a direct mailing effort to new homeowners as identified by the Assessor's office through new home sales.
- Staff would identify a street within the City and all owner-occupied properties were sent letters with information about the housing rehabilitation loan program.
- For applicants that had insufficient equity to undertake the needed rehabilitation items, staff continued the effort to offer a combination of deferred loan with repayment to the Redevelopment Authority. For the value of the work that exceeded equity, the applicant agreed to a manageable repayment plan. The Housing Rehabilitation Loan Program Guidelines and Procedures Manual was amended in PY2013 to incorporate this type of flexible funding.

2.) The lack of funds to meet all underserved needs continues to be an obstacle. This obstacle is compounded by budget cuts, staff cuts and reductions in grant programs at the federal, state and local level. Working with community partners, staff continued to look at innovative ways to meet needs and effectively use available funds.

- The Fond du Lac County Health Department as part of their annual assessment identified lack of access to dental care for low-and-moderate income persons as a priority need within the community. Through public and private partnerships any commitment of CDBG funds would be maximized by other funds, in-kind contributions, and other resources. Access to dental care continues to be an ongoing demand. The funding does not provide full reimbursement for the dental service and the dental care provider covers the remaining costs as in-kind contributions.
- Staff continued to look at opportunities to collaborate with other agencies to undertake projects. For example, starting in 2013, the City and Housing Authority have been collaborating on a landlord training session. The City and Housing Authority share sponsorship responsibilities for guest speakers/presenters and materials. The landlord training event has been very well received by local landlords.

2.) The lack of funding, not related to COVID19, is a significant obstacle to meeting underserved needs. The City has also been active in identifying other funding sources. In 2017 -2020, the City applied for EPA Brownfield Grant funds. The City was once again not successful for 2021 or 2022. The City will regroup and try again for the 2024 funding cycle. The City had a Census tract identified as an Opportunity Zone so staff will be working with Envision Greater Fond du Lac (local Economic Development Corporation), developers and property owners to utilize that resource.

3) Staffing for community partners that provide a direct service to low and moderate income persons and those working through homelessness was a challenge that emerged in PY2021 and continued in PY2022. City staff worked with community partners to connect them with various religious institutions within the community that have a large network of volunteers, business associations and facilitated/promoted job postings to help fill positions. Staff also helped brainstorm ideas with their leadership to identify ways to adjust to meet lower staffing levels in the short term.

Actions taken to reduce lead-based paint hazards. 91.220(k); 91.320(j)

The City is committed to addressing lead-based paint hazards.

1) Using its own funds, the City purchased a new advanced XRF machine, a Viken Pb200i, since the old equipment was outdated. This product enables the City's Housing Rehabilitation Specialist (HRS) to perform a full lead hazard inspection as part of his regular housing rehabilitation survey inspection.

- The HRS is trained to operate the Niton and also is a licensed risk assessor/lead inspector/supervisor by the State of Wisconsin. Having this device enables the City to avoid "assuming lead" on all deteriorated paint surfaces, which can lead to considerable cost savings

on our rehab projects.

- Deteriorated painted surfaces that contain lead are treated in accord with “lead safe work practices” and, if necessary, occupants are temporarily relocated, and rehab work is performed by trained and licensed lead abatement contractors.

2) The City required any Housing Rehabilitation Loan Program applicant who has a child under age of six (6) to complete testing to determine if the child has elevated blood lead levels.

3) The Housing Rehabilitation Loan Program also receives referrals from the Fond du Lac County Health Department for households that have a lead poisoning that reside in the City. Staff will assist those households with corrective rehab work items or partner with other agencies or private lenders to complete the work.

4) The City works with the State - Lead Hazard Paint Mitigation Grant. Pre- COVID, the Health Department had received funds, but opted out due to the demands of managing the pandemic and then vaccinations. If the County applies again to receive funds, the City will work with the Health Department. If not, City staff will continue to work with the State as needed for more challenging lead based paint cases.

Actions taken to reduce the number of poverty-level families. 91.220(k); 91.320(j)

Poverty is a great concern for the City of Fond du Lac. According to the 2000 Census, 2,992 individuals within the City of Fond du Lac had income below the poverty level. This represents 7.5% of the City’s population. By comparison, 5.8% of Fond du Lac County’s population had income below the poverty level. According to the 2007-2011 American Community Survey, 5,364 individuals, or 13.1% of the City’s population, had income within the last 12 month time period that was below poverty level. By comparison, 9.54% of Fond du Lac County’s population was at poverty level for the same time period. Efforts to reduce the number of individuals living below the poverty level is a community-wide activity. CDBG funds support a small portion of the efforts with other organizations being supported by the City and staff with other funding mechanisms and participation.

PY2022 continued to be as unique as PY2021 as many State and federal programs emerged or remained to allocate and distribute additional funding sources through various federal agencies in the community, whether it was increased unemployment support, rental assistance or payroll protection for businesses. This influx of additional funding did not necessarily reduce the number of poverty- level families, but certainly assisted in minimizing increasing the number of poverty level families.

That said, the City still undertook its typical activities and partnerships to reduce poverty. However, the utilization of those efforts was altered due to additional funding mechanisms and staffing challenges.

Actions taken to develop institutional structure. 91.220(k); 91.320(j)

Many activities to develop institutional structure were negatively impacted by COVID19 due to limitations of virtual meetings, occupancy limitations for meetings and closures. These restrictions remained in PY2021. Many community partners continued the virtual format of meeting which created challenges for effective communication and engagement.

1) The Housing Authority and Community Development Department partner each year to host an annual landlord training. This was not held in PY2022 due staffing and funding challenges.

2) The Community Development Director has attended monthly Housing Coalition meetings. These went to virtual meetings and the quality of the conversation/collaboration was impacted.

3) Community Development staff continued to participate with various groups and committees, such as the River Park Neighborhood Group (formerly Hamilton Area Neighborhood District), Downtown Fond du Lac Partnership, Downtown Architectural Review Board, and Fond du Lac County Economic Development Corporation (FCEDC) Loan Review Committee to increase communication and partnerships within the community. By participating in these committees, staff is able to learn about issues within the community and intervene, if possible, at the front end versus later in the process.

6) Community Development staff meets frequently with representatives from the Envision Greater Fond du Lac (the City's new Association of Commerce and Economic Development Organization) to focus specifically on economic development issues.

Actions taken to enhance coordination between public and private housing and social service agencies. 91.220(k); 91.320(j)

While still undertaken, the desire by community partners to focus on virtual meetings, impacted the frequency and quality of the interactions. The City of Fond du Lac participates in the Housing Coalition/Continuum of Care. At these monthly meetings, a variety of community partners, including several social service agencies, discuss issues, challenges and opportunities facing their clients. This is a conversation that makes the Housing Authority aware of the resources available to their tenants that may help them stay in housing, such as mental health counseling and supportive services. In addition, social service agencies learn about the obstacles facing public housing, why public housing may not be readily available and when units or vouchers available through the Housing Authority.

Coordination between private housing and social service agencies continues to be a challenge. The City and Housing Authority continue to participate in monthly River Park Neighborhood meetings where private landlords attend from time to time. This creates an opportunity for landlords to share their issues and concerns and for City and Housing Authority staff to educate them on resources available through social service agencies for their tenants. However, the best opportunity appears to be the annual landlord training that the City and Housing Authority mutually host each year. Each year, staff works to identify different speakers and presenters to educate landlords in the private sector about different resources. In 2019, the agenda included a Community Partners roundtable to educate the

landlords on how various public and nonprofit assistance programs and services work to try to bridge the gap between tenants and landlords and eliminate or reduce stigmas of such programs. The City and Housing Authority will continue this initiative and continue to identify a broad range of speakers to enhance coordination between the private housing market and social service agencies. City and Housing Authority staff hope to resume the landlord training in PY2023 and will likely revisit the various public and nonprofit assistance programs since the gap of COVID19 and emergence of new funding (Emergency Rental Assistance) have positively and negatively impacted these perceptions.

Identify actions taken to overcome the effects of any impediments identified in the jurisdictions analysis of impediments to fair housing choice. 91.520(a)

In 2017, the City, in partnership with the Fond du Lac Housing Authority, completed an update to the analysis of impediments- Assessment of Fair Housing. One of the challenges identified in the update was the location and type of affordable housing was concentrate in the City's center and northwest quadrant. One of the primary factors contributing to this issue is that many developers seeking to construct or develop affordable housing apply for Low Income Housing Tax Credits through the Wisconsin Housing and Economic Development Authority (WHEDA). WHEDA bases their allocation of LIHTC on their Qualified Allocation Plan (QAP) which identifies eligible Census tracts. The eligible Census tract is located in the City's center. However, the City's industrial parks are located on the southwest portion of the City. Staff has expressed concerns with WHEDA regarding their approach to allocations within the City and have asked that they broaden their review to other factors. The Great Recession has also had an impact on the City's housing market. While the City has seen some growth in housing over the last two (2) years, it is still very conservative. Finally, the other issue facing distribution of affordable housing in other parts of the City is access to land for development. The City approved a new Cooperative Plan in 2017 with adjoining towns to allow City Growth Areas beyond its existing boundaries. This opens the door to the City annexing land into its boundaries should the opportunity arise for new development on the northeast or southeast side of the City.

The updated report identifies opposition to affordable housing in other areas of the County, causing the majority of affordable housing options to be located within the City. Over the last year, staff is hearing word that the cities of Waupun and Ripon may be seeing additional multifamily development. The biggest challenge facing development beyond the City's boundaries is access to utilities. Many of the smaller communities are not able to support larger scale multifamily developments without more extensive sewer and water capacity. In addition, these communities have fewer opportunities to qualify for LIHTCs which is an integral financial element in developing affordable housing.

One of the goals and priorities in the updated report is to increase homeownership opportunities for potential homebuyers across all races and ethnicities. The City continues to work with Advocap and Habitat for Humanity to develop affordable homebuyer options. In addition, the City acquires and rehabs foreclosed properties and offers them to income eligible homebuyers. The City works closely with the Fond du Lac Housing Authority to notify their residents and voucher holders of homeownership opportunities. The City also works with other community partners to distribute information about these

options as well as make referrals to these programs.

The City continues to reference the 2017 Assessment of Fair Housing and work with the Fond du Lac Housing Authority and other community partners to address obstacles, goals and priorities.

CR-40 - Monitoring 91.220 and 91.230

Describe the standards and procedures used to monitor activities carried out in furtherance of the plan and used to ensure long-term compliance with requirements of the programs involved, including minority business outreach and the comprehensive planning requirements

The following procedures are used to monitor activities:

- The overall financial performance of the Program is monitored through monthly reports to the RDA. Financial reports must be approved by the RDA.
- Financial performance of the City's Program is monitored through the CAPER at the local level and the federal level. Staff continued to maintain a "mini" CAPER (non-HUD report form) that summarizes funds expended and accomplishments for all program years. This mini CAPER is presented to the RDA.
- Staff monitored financial performance through review of IDIS reports, measurements against the timeliness factor and the City's drawdown history.
- The overall management performance of the Program was monitored through review of progress toward implementation of goals by RDA at monthly meetings.
- Staff monitored management performance through review of progress toward implementation of goals through CAPER.
- Staff monitored the management performance of subrecipients through the level of technical assistance required by the subrecipient and quarterly reports to the City. Staff also meets on-site with the subrecipients to review progress towards goals and reported outcomes.
- Staff reviews each activity against the City's comprehensive plan.
- The City undertakes an effort to recruit new contractors to the Housing Rehabilitation Loan Program, focusing on minority owned businesses and women owned businesses, every three (3) years.

Staff monitored progress towards meeting the needs identified in the Consolidated Plan through the number and type of requests received by groups for funding. As the City received new requests for funding, staff compared them to the Consolidated Plan. Requests that were not identified in the Consolidated Plan may suggest that the needs in the community are changing and that the Consolidated Plan may need to be amended to reflect the proper allocation to meet those needs.

Citizen Participation Plan 91.105(d); 91.115(d)

Describe the efforts to provide citizens with reasonable notice and an opportunity to comment on performance reports.

The City makes every effort to provide citizens with reasonable notice and opportunity to comment on performance reports. A notice is published on the City website as well as distributed/posted at public locations throughout the City including the Library, City/County Building, Police Department and Senior Center. A notice is published in the Action Advertiser (a free publication). However, the City's ongoing ability to utilize this resource is in question as it is no longer as dependable as the shift from print media to social media/digital media continues. A copy of the report/summary is posted on the City's website. The outcomes and summary is given at a Redevelopment Authority meeting which is a publicly posted and available meeting.

During PY2018, the City undertook an effort to update its website. The new website provides enhanced visibility and search capabilities for those individuals looking for information or resources. Staff continues to look at new and different ways to reach out to the community. One of the biggest challenges in connection with citizens is the reduction in traditional media and shift towards social media. The City will need to work towards ways of improving utilization of social media, not just for CDBG purposes but across all services.

The City did utilize the modified citizen engagement process authorized by HUD in order to allocate funding from CV#1 and CV#3 to needed activities. However, staff worked to ensure awareness of this effort despite the impacts of COVID19.

The public comment period on the PY2022 CAPER was from March 17, 2021 through April 21, 2021. The City did not receive any comments during the public comment period.

CR-45 - CDBG 91.520(c)

Specify the nature of, and reasons for, any changes in the jurisdiction's program objectives and indications of how the jurisdiction would change its programs as a result of its experiences.

The City did not change any of its' program objectives in Program Year 2022. As a result of experiences that delayed expenditure of funds, the City re-evaluated how it developed the program objectives. Instead of changing the objectives, the City developed secondary activities, still in conformance with the program's objectives, to ensure the effective and efficient investment of funds. This ensures that if there is an unexpected delay in an activity, that another activity can be undertaken to benefit the community while still meeting program objectives.

Despite the COVID19 pandemic, the City staff directed funds to those projects that were consistent with

the Annual Action Plan and Consolidated Plan. PY2020 significantly impacted performance on certain activities, such as the Housing Rehab Loan Program. The City saw an increase in interest in Fall PY2020 and anticipated that this would continue into PY2021. However, PY2021 remained stagnant and PY2022 did not see any significant improvement. Unfortunately, housing rehab loans were significantly lower than anticipated as the comfort of homeowners having outside personnel in/near their homes caused lower interest and the impact of contractor availability and material availability and cost also impacted progress. Community partners were navigating the COVID19 health guidelines and regulations and since the City directs CDBG directly to beneficiaries smaller number of beneficiaries were assisted due to social distancing and occupancy limitations.

Finally, City staff could not have anticipated or expected what the impact of the various federal and state programs rolled out as part of the COVID19 pandemic and reopening would have on the CDBG program. Community partners had access to more funding opportunities, some with fewer restrictions, than CDBG sub recipient grants. The amount of funds available made it difficult to expend CDBG funds as many opted to use other programs whether it was businesses, nonprofit partners or homeowners. In a community the size of Fond du Lac where multiple sources are targeting the same population and preventing overlapping beneficiaries, it is a challenge to implement program objectives compared to larger communities where the need is much larger.

The City took public comment of past activities from February 15, 2023 through March 17, 2022. The City did not receive any comments from the public.

Does this Jurisdiction have any open Brownfields Economic Development Initiative (BEDI) grants?

No

[BEDI grantees] Describe accomplishments and program outcomes during the last year.

CR-45 - CDBG 91.520(c)

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Does this Jurisdiction have any open Brownfields Economic Development Initiative (BEDI) grants?

No

[BEDI grantees] Describe accomplishments and program outcomes during the last year.

CR-58 – Section 3

Identify the number of individuals assisted and the types of assistance provided

Total Labor Hours	CDBG	HOME	ESG	HOPWA	HTF
Total Number of Activities	5	0	0	0	0
Total Labor Hours	50				
Total Section 3 Worker Hours	50				
Total Targeted Section 3 Worker Hours	0				

Table 8 – Total Labor Hours

Qualitative Efforts - Number of Activities by Program	CDBG	HOME	ESG	HOPWA	HTF
Outreach efforts to generate job applicants who are Public Housing Targeted Workers	0				
Outreach efforts to generate job applicants who are Other Funding Targeted Workers.	0				
Direct, on-the job training (including apprenticeships).	0				
Indirect training such as arranging for, contracting for, or paying tuition for, off-site training.	0				
Technical assistance to help Section 3 workers compete for jobs (e.g., resume assistance, coaching).	0				
Outreach efforts to identify and secure bids from Section 3 business concerns.	1				
Technical assistance to help Section 3 business concerns understand and bid on contracts.	0				
Division of contracts into smaller jobs to facilitate participation by Section 3 business concerns.	1				
Provided or connected residents with assistance in seeking employment including: drafting resumes, preparing for interviews, finding job opportunities, connecting residents to job placement services.	0				
Held one or more job fairs.	0				
Provided or connected residents with supportive services that can provide direct services or referrals.	1				
Provided or connected residents with supportive services that provide one or more of the following: work readiness health screenings, interview clothing, uniforms, test fees, transportation.	0				
Assisted residents with finding child care.	0				
Assisted residents to apply for, or attend community college or a four year educational institution.	0				
Assisted residents to apply for, or attend vocational/technical training.	0				
Assisted residents to obtain financial literacy training and/or coaching.	0				
Bonding assistance, guaranties, or other efforts to support viable bids from Section 3 business concerns.	1				
Provided or connected residents with training on computer use or online technologies.	0				
Promoting the use of a business registry designed to create opportunities for disadvantaged and small businesses.	0				
Outreach, engagement, or referrals with the state one-stop system, as designed in Section 121(e)(2) of the Workforce Innovation and Opportunity Act.	0				

Other.	0				
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Table 9 – Qualitative Efforts - Number of Activities by Program

Narrative

The City works closely with the Housing Authority of the City of Fond du Lac, Advocap and Forward Services to assist with many of the activities outlined above. However, they were not identified as part of any one specific program so much as just a part of working with residents and businesses. The City is an ongoing participant in a Childcare Taskforce that was created in early PY2023 (does not help with PY2022) as a result of ongoing community conversations about the availability and affordability of child care in the community. The Taskforce is comprised of Envision Greater Fond du Lac (Chamber of Commerce); local employers, City, County, School District, child care providers and other entities that are related to child care programming but not direct child care providers. The ability to help residents find child care is directly related to increasing the availability and improving the affordability of child care in the community as staff is aware that many are opting out of the workforce until children reach school age. As part of the Housing Rehabilitation Loan Program and CDBG funded activities, the City has reduced the insurance requirements to help enable smaller, Section 3 businesses to participate in projects. The Housing Rehabilitation Loan Program is a perfect opportunity for Section 3 contractors working to build their business, as many of the work items are already small in nature. The City actively updates lists of contractors by researching State and Federal sites for S/W/MBE contractors. The City proactively reaches out to new contractors to encourage them to bid on CDBG funded projects. Staff is known to take photos of contractor vehicles as they drive around town looking for new contractors. Staff also works closely with the Inspections to identify new contractors. The City, when working with any resident that expresses an interest in any program or, really, asks for any assistance, will direct residents to available supportive services.

The 5 activities were housing rehabilitation loan activities. The contractors were Section 3 and did not have workers and did the work themselves. The hours are estimated because they were not tracked for 2022. The City will work on improving that for PY2023.