

**Program Year 2020  
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  
August 2021**

## 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 was significantly impacted by the COVID19 pandemic. Due to the uncertainty in the early part of the PY2020, the housing rehabilitatin loan program was paused as the City worked to follow the State of Wisconsin COVID19 requirements along with those from the Fond du Lac County Health Department. Once work was able to resume, the availability of contractors and the cost of materials significantly impacted the City's ability to assist low and moderate income homeowners. Public service partners were greatly impacted on how they could provide services to their clients. Work from home and virtual meetings impacted communication initially as everyone worked to adjust to the "new normal". In addition, seperate from the work supported through the Community Development Block Grant Program, City staff within the Department of Community Development had to pivot and focus on the means of helping local businesses accommodate the new requirements. Finally, the extyension of funding through the CARES Program added additional demand on City staff as efforts would made to manage existing CDBG programs; understands, comply and rollout the Cares Funding and assist the community through a pandemic as part of City operations.

### 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%	1	0	0.00%

After-School Educational Program	Non-Housing Community Development	CDBG: \$	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	Persons Assisted	0	0		100	49	49.00%
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 Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	Persons Assisted	0	0		50	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%	1	0	0.00%
Economic Opportunities- Job Creation/Retention	Economic Development	CDBG: \$ / Tax Increment Financing: \$	Jobs created/retained	Jobs	50	0	0.00%	5	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%	1	0	0.00%
Food Pantry Service Expansion	Non-Housing Community Development	CDBG: \$	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	Persons Assisted	400	3684	921.00%	100	0	0.00%
Food Pantry Service Expansion	Non-Housing Community Development	CDBG: \$	Homeless Person Overnight Shelter	Persons Assisted	0	0				
Food Pantry Service Expansion	Non-Housing Community Development	CDBG: \$	Overnight/Emergency Shelter/Transitional Housing Beds added	Beds	0	0				
Homeownership - Community Partners	Affordable Housing	CDBG: \$	Homeowner Housing Added	Household Housing Unit	12	0	0.00%			

Homeownership - Community Partners	Affordable Housing	CDBG: \$	Homeowner Housing Rehabilitated	Household Housing Unit	0	0		1	0	0.00%
Homeownership- City Rehabilitation	Affordable Housing	CDBG: \$	Homeowner Housing Added	Household Housing Unit	0	0		1	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%	100	0	0.00%
Owner Occupied Housing Rehabilitation	Affordable Housing	CDBG: \$	Homeowner Housing Rehabilitated	Household Housing Unit	60	0	0.00%			
Owner Occupied Housing Rehabilitation	Affordable Housing	CDBG: \$	Direct Financial Assistance to Homebuyers	Households Assisted	0	0		12	0	0.00%
Project Learn	Non-Housing Community Development	CDBG: \$	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	Persons Assisted	0	0		50	0	0.00%

Project Learn	Non-Housing Community Development	CDBG: \$	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	350	0	0.00%			
Renter Occupied Housing Rehabilitation	Affordable Housing	CDBG: \$	Rental units rehabilitated	Household Housing Unit	4	0	0.00%	135	0	0.00%
Summer Educational Program	Non-Housing Community Development	CDBG: \$	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	Persons Assisted	0	0		100	52	52.00%
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%			
Transit Amenities	Non-Housing Community Development	CDBG: \$	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	Persons Assisted	400	0	0.00%			
Warming Shelter - Homeless	Homeless	CDBG: \$	Homeless Person Overnight Shelter	Persons Assisted	0	0		30	53	176.67%

Warming Shelter - Homeless	Homeless	CDBG: \$	Overnight/Emergency Shelter/Transitional Housing Beds added	Beds	150	0	0.00%			
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**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 COVID19 pandemic, 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.

## 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	87
Black or African American	19
Asian	2
American Indian or American Native	1
Native Hawaiian or Other Pacific Islander	0
<b>Total</b>	<b>109</b>
Hispanic	14
Not Hispanic	95

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

### Narrative

The City of Fond du Lac is an evolving community. The data regarding families assisted shows that the City is becoming a more demographically diverse population. Historically, the community has been a predominantly white population with an industrial/manufacturing employment base surrounded by agriculture. The growth and diversity can be seen not only through the families served by CDBG funds, but also by enrollment data at the Fond du Lac School District which shows each kindergarten class more diverse than the graduating senior class from the high school. This is best reflected in the services funded by CDBG provided by the Boys & Girls Club of Fond du Lac. Qualitatively, City staff continues to hear that many people moving into the community are seeking better opportunities for themselves and their families as they relocate from larger metropolitan areas (Milwaukee and Chicago specifically). In addition, the low unemployment rate and growth amongst many of the community's manufacturing employers are employment needs that cannot be met alone without attracting people to move into the community. Unfortunately, those households relocating from other metropolitan areas are facing financial challenges until they can secure housing and employment.



## 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	790,226	
LIHTC	private	0	
Tax Increment Financing	public - local	0	

Table 3 - Resources Made Available

### Narrative

The values reported under the CDBG Source of Funds for resources Made Available and Expended are derived from PR02 PY 2020 Totals.

The project that the City anticipated would receive Low-Income Housing Tax Credits (LIHTCs) was not awarded an allocation during PY2017- PY2029. The City worked with the developer in PY2020 and the project was awarded LIHTCs. However, those tax credits will not be realized until PY2021 or early PY2022. This, as a result, impacted the utilization of Tax Increment Financing in this neighborhood. However, the redevelopment of the Casket Company will be the catalyst for further redevelopment in the Tax Increment Finance District. The funds are still available and the City will look to make the investment as the opportunity.

### 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 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 assistance to Fondy Food Pantry for their relocation and expansion continues to leverage various private donations of volunteer hours and furniture/fixtures not funded through the CDBG activity (shelving, office furniture, computers, food donations, etc.)
- 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	12	5
Number of Special-Needs households to be provided affordable housing units	2	4
<b>Total</b>	<b>14</b>	<b>9</b>

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	12	5
Number of households supported through Acquisition of Existing Units	0	0
<b>Total</b>	<b>12</b>	<b>5</b>

Table 6 – Number of Households Supported

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

The COVID19 pandemic significantly impacted progress towards the affordable housing goals, primarily the Housing Rehabilitation Loan Program. Due to the State of Wisconsin and Fond du lac County guidelines, many homeowners were not engaging outside their homes. In Fall 2020, staff started to see interest in the program again. However, contractor availability and the cost of materials, along with the ability to get materials, impacted outcomes. Staff is anticipating seeing slow progress in PY2021 as well as a result of similar challenges.

**Discuss how these outcomes will impact future annual action plans.**

It is uncertain how the COVID19 pandemic, 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.

**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.**

<b>Number of Households Served</b>	<b>CDBG Actual</b>	<b>HOME Actual</b>
Extremely Low-income	0	0
Low-income	1	0
Moderate-income	4	0
<b>Total</b>	<b>5</b>	<b>0</b>

**Table 7 – Number of Households Served**

**Narrative Information**

The households assisted during PY2020 were all moderate income. Those households that usually participate in the Housing Rehab Loan Program that are extremely low income or low income tend to be elderly or fall within the other special needs demographic categories. Despite our outreach efforts, the City did not receive any applications from those income level households. The City will continue to collaborate with other formula grantees on creative ideas for connecting with residents as well working with communitypartners to help disseminate information about 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**

PY2020 was a continued, though significantly 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, Solution Center and St. Vincent De Paul undertook a partnership to expand shelter capacity to serve families as well as singles experiencing homelessness. The project broke ground during late PY2020. This effort was supported by the Continuum of Care/Housing Coalition and City by providing insight throughout the process. Due to COVID19, the City worked with community partners to find an alternative location for the chronically homeless to go during the day since the Library was closed. A local church in the downtown had a existing meeting space that could accommodate the need and maintain compliance with CDC guidelines and Fond du Lac County Health Department guidelines.

The City was also anticipating kicking of the start of a year long Homeless Strategy. However, the COVID19 resulted in deferring the 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 City hopes to restart this effort in PY2021.

### **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 is committed to operating the warming shelter program as well as working with the City to accommodate changing conditions. Due to COVID19, the City worked with community partners to find an alternative location for the chronically homeless to go during the day since the Library was closed. A local church in the downtown had a existing meeting space that could accommodate the need and maintain compliance with CDC guidelines and Fond du Lac County Health Department guidelines.

**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). Over the past Program Year, the City continued 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 is supporting 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. Due to COVID19, collaboration, communication and services had to be modified to adhere to public health requirements. However, all members of the Housing Coalition were extremely committed to help those in need.



## **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. Due to COVID19, 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. Due to COVID19, Housing Authority staff increased efforts to communicate with residents due to limitations on gatherings and social distancing requirements.

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 have 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 Low Income Housing Tax Credit (LIHTC) projects within the community, including the conversion of two (2) former schools into family apartments and a downtown office building into apartments. The City continues to work with another property owner on an outstanding Raze or Repair Order because a developer is working to secure LIHTCs for the project. The City would rather see the property converted to residential development rather than raze it. City staff has actively encouraged the Wisconsin Housing and Economic Development Authority (WHEDA) to look at other opportunities for LIHTC 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.

## **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 PY2020, the availability of contractors and cost of materials also became an obstacle to meeting underserved needs as a result of the COVID19 pandemic. Despite the restrictions in place as a result of COVID19, staff still tried 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/preseners 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 2020 but will be re-applying in PY2021 (5th time is the charm?). 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. City staff is working on a possible New Market Tax Credit pre-application to the Wisconsin Housing and Economic Development Authority (WHEDA) for a downtown grocery store.

### **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 and Health Department are also working together on a new initiative through the State - Lead Hazard Paint Mitigation Grant. The Health Department receives the grant funds and we work with them and support them as they undertake projects and identifying properties of concern.

### **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.

PY2020 was unique not only in the impacts of the COVID19 pandemic, but also on the allocation and distribution of additional funding sources through various federal agencies into 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 which was a very real concern early in the pandemic when additional funding had not yet been determined.

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 restrictions/challenges resulting from COVID19.

### **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.

1) The Housing Authority and Community Development Department partner each year to host an annual landlord training. This was not done in PY2020 due to COVID19.

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, these efforts were impacted by COVID19 in terms of 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.

**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 affordabnle 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 sewr 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 imformation 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 PY2020 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 2020. 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 to funds to those projects that were consistent



with the Annual Action Plan and Consolidated Plan. In addition, early on in PY2020, staff was optimistic (naive) that the COVID19 pandemic would drastically impact the City's ability to leverage CDBG funding into the community. 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.

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

No

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

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