



CONSOLIDATED ANNUAL PERFORMANCE AND EVALUATION REPORT PY2024



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.

The City of Pocatello's Community Development Block Grant (CDBG) Program Year 2024 (PY24) was year two of the City's 2022-2026 Consolidated Plan. The PY24 Consolidated Annual Performance Evaluation Report (CAPER) details the PY24 CDBG activities and accomplishments, including expenditures and beneficiaries. The period covered includes April 1, 2024-March 31, 2025. The CAPER is the performance report for the PY24 Annual Action Plan (AAP) which served as the Strategic Plan to implement the Consolidated Plan goals, including: 1) Housing; 2) Program Administration; 3) Public Facilities & Improvements; 4) Public Infrastructure; and 5) Public Services. These goals address affordable housing, public housing, homeless and non-homeless special needs, and community development. The PY24 AAP funded the following activities to achieve the goals detailed in the Consolidated Plan: residential rehabilitation loans and grants through the City's RENEWAL (Revitalizing Existing Neighborhoods through Enhancement Work and Livability) program; sidewalk improvements for qualifying LMI individuals and areas, including removal of architectural barriers and mobility impairments; acquisition in part for the Aid for Friends (AFF) homeless shelter; case management services and Pocatello Regional Transit tickets for homeless individuals provided by AFF; lead-based paint remediation through the City's Lead Safe and Healthy Homes program; case management services for disabled adults, provided by New Day Products; dental services for uninsured clients provided by the Pocatello Free Clinic; nutrition program for the elderly as provided by the Senior Activities Center; after school service program by the Boys & Girls Club; and social service assistance provided by St. Vincent de Paul. The City contracted with subrecipients to effectively administer PY24 funds for Public Service, Housing, and Public Facility activities. The RENEWAL, sidewalk, and lead-hazard control work was administered in-house by City Staff. In addition to those activities detailed above, 20% of the PY24 funding was allocated to Planning & Administration for fair housing activities, including a Fair Housing training conducted by Intermountain Fair Housing Council and program administration. Program income was earned from the housing rehabilitation and acquisition loan programs. As loan recipients made payments on acquisition/infill or rehab loans through the City's program or NWP, that Program Income was receipted in on a monthly basis and allocated to the monthly expenses for RENEWAL program expenses, sidewalks, program administration, and subrecipient activities. Program income was always expended first, ahead of entitlement funds, for eligible activities. Every program year, the demand for funding well exceeds what is available to commit. CDBG continues to be a necessary funding source for critical services related to affordable housing, homeless and non-homeless special needs, and community development for LMI residents in the City.

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
Housing	Affordable Housing	CDBG: \$	Rental units rehabilitated	Household Housing Unit	250	0	0.00%	4	0	0.00%
Housing	Affordable Housing	CDBG: \$	Homeowner Housing Added	Household Housing Unit	5	0	0.00%			
Housing	Affordable Housing	CDBG: \$	Homeowner Housing Rehabilitated	Household Housing Unit	140	78	55.71%	52	30	57.69%
Program Administration	Affordable Housing Public Housing Homeless Non-Homeless Special Needs Non-Housing Community Development	CDBG: \$	Other	Other	1	1	100.00%	1	1	100.00%

Public Facilities and Improvements	Homeless Non-Homeless Special Needs Non-Housing Community Development	CDBG: \$	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	Persons Assisted	1000	5198	519.80%			
Public Facilities and Improvements	Homeless Non-Homeless Special Needs Non-Housing Community Development	CDBG: \$	Homeless Person Overnight Shelter	Persons Assisted	500	1249	249.80%	335	427	127.46%
Public Infrastructure	Non-Housing Community Development	CDBG: \$	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	Persons Assisted	6000	2905	48.42%	2346	2900	123.61%
Public Services	Non-Homeless Special Needs Non-Housing Community Development	CDBG: \$	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	5850	5901	100.87%	983	1552	157.88%

Public Services	Non-Homeless Special Needs Non-Housing Community Development	CDBG: \$	Public service activities for Low/Moderate Income Housing Benefit	Households Assisted	625	1	0.16%			
Public Services	Non-Homeless Special Needs Non-Housing Community Development	CDBG: \$	Homeowner Housing Rehabilitated	Household Housing Unit	0	0				
Public Services	Non-Homeless Special Needs Non-Housing Community Development	CDBG: \$	Homeless Person Overnight Shelter	Persons Assisted	0	427		0	427	
Public Services	Non-Homeless Special Needs Non-Housing Community Development	CDBG: \$	Overnight/Emergency Shelter/Transitional Housing Beds added	Beds	0	0		0	0	
Public Services	Non-Homeless Special Needs Non-Housing Community Development	CDBG: \$	Homelessness Prevention	Persons Assisted	400	743	185.75%	0	0	

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

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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.

Priority needs identified in the Consolidated Plan include: provide decent housing; create a suitable living environment; and expand opportunities for LMI persons. These priorities are all identified as high priority in the Consolidated Plan. To address priority 1) provide decent housing, the City conducted its RENEWAL home rehab loan and grant program for LMI residents. CDBG funds also were used in conjunction with the City's Lead Hazard Control and Healthy Homes grant awarded through OLHCHH. This allowed for lead hazard reduction in 5 homes. Overall, these programs work in tandem to provide decent housing for the target population and more specifically preserve the City's affordable housing stock. The combination of programs resulted in property rehabilitation and repair work in **30** housing units in Pocatello.

For priority 2) create a suitable living environment, the City funded several activities through public facility, public infrastructure, and public service projects to ensure residents have a living environment that allows people to lead their daily lives and meets basic needs such as living, services, working, recreation, hobbies, rest, and privacy. Through the Aid for Friends shelter acquisition project, the City is working toward ensuring residents have an option to address needs when encountering homelessness. In PY24, the Shelter served 427 unduplicated beneficiaries. Further, the City implemented its sidewalk repair program, which primarily focused on LMA neighborhoods to repair large areas of sidewalk and improve mobility and accessibility to public transit facilities as well as at a local public park adjacent to the City's Senior Activity Center. The neighborhood sidewalk repair program focused on the Bonneville neighborhood which is LMA and resulted in **1,700** linear feet of replaced sidewalks, **7** ADA-compliant ramps, and **936** linear feet of sidewalk repaired to remove architectural barriers such as lifts, lips, and cracks. Housing projects and public service projects also serve to create opportunities, addressing the quality of life for Pocatellans.

Finally, to address priority 3) expand opportunities for LMI persons, the City funded public facility, public service, and program administration activities. Specifically, these activities allow residents to become financially stable and remain in safe and stable housing. Activities such as homeless case management, food banks, case management services, social services, and short-term emergency assistance all support this priority objective. Specifically, the AFF PRT ticket program assisted **170** clients, AFF case management assisted 427 clients, Boys & Girls Club program served **164** clients, New Day Products provided case management services to 99 clients, the Pocatello Free Clinic provided dental services to 231 clients, Senior Activity Center assisted **810** clients, and Saint Vincent de Paul assisted 78 clients.

Overall, CDBG funds were used to assist **5,336** beneficiaries during the program year which exceeds the expected beneficiaries of **3,721** for PY24.

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	1,868
Black or African American	59
Asian	18
American Indian or American Native	129
Native Hawaiian or Other Pacific Islander	20
Total	2,094
Hispanic	249
Not Hispanic	2,187

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

Narrative

The Race totals above do not allow for inclusion of the categories: "American Indian/Alaskan Native & White", "Asian & White", "Black/African American & White", and "Other multi-racial", which accounts for 342 beneficiaries. As such, the actual total should be 2,436. In addition, these totals do not include the infrastructure upgrades for the LMA sidewalk programs which add an additional 2900 beneficiaries served.

The City reviewed the demographic breakdown of the data to see which populations were being reached by CDBG programs. Looking at this breakdown as compared to the 2024 Census population estimates, it is clear the CDBG program beneficiaries are represented by minority races at higher rates than the population estimate.

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	590,957	537,634

Table 3 - Resources Made Available

Narrative

The PY24 Annual Action Plan only anticipated \$401,595 in resources available through the CDBG entitlement funding for the program year. This included the entitlement of \$376,595 and \$25,000 in Program Income. In PY24, there were unexpended funds that were used along with PI in excess of that anticipated in the PY2 Annual Action Plan. The total expended in PY24 was \$537,634.33. This was calculated using the PR-26. Resources for PY24 expenditures included:

Unexpended CDBG balance from previous PYs: \$160,038.24

PY24 Entitlement funding: \$376,595.00

Funds returned to local CDBG account: \$2397.33

Program Income: \$51,926.59

Total Available: \$590,957.16

Total Expenditures: \$537,634.33

The attached PR-26 in the Administration Section of the CAPER contains a more thorough breakdown of expenditures by activity.

Identify the geographic distribution and location of investments

Target Area	Planned Percentage of Allocation	Actual Percentage of Allocation	Narrative Description
Pocatello Citywide	100	100	City of Pocatello

Table 4 – Identify the geographic distribution and location of investments

Narrative

All funds were used for projects that reach the target area which is the City of Pocatello.

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 CDBG program primarily provides funding for housing, public facility, public infrastructure, and public service activities. In Program Year 2024, the CDBG program funding supported eligible expenses identified through the OLHCHH Lead Hazard Control and Healthy Homes grant program administered by Pocatello. Through this, CDBG funds were able to support lead hazard reduction activities in three homes, while OLHCHH funding was leveraged for other eligible expenses for healthy homes supplemental work.

For public facility projects, the City continued to fund partial acquisition of the Aid for Friends homeless shelter. The total cost of the shelter is \$1.6M which was funded by IHFA, thereby allowing CDBG to be used in part with other funding attributing to the shelter costs. Similarly, public infrastructure funding was used to continue with the neighborhood sidewalk project. The program will leverage federal transit authority funding in order to complete repair and replacement of vital LMA corridors that will connect to bus stops. City staff completed the NEPA and Bidding of the project as well as other related service delivery in PY23. While some service delivery work was funded through CDBG, the City leveraged other Public Works and Engineering Staff to ensure proper bidding and project management was underway. Construction of sidewalk concluded in PY24.

Finally, public service activities were funded for a variety of agencies. CDBG allows for an increase or addition of services offered by these agencies. Most agencies conduct services beyond those simply funded by CDBG and CDBG funding does not cover all program expenses. Very few of the agencies submit indirect costs. These agencies support the services through their budgets which are comprised of multiple funding sources such as private funds, donations, or other grants.

Publicly owned property in the jurisdiction is used to support the needs identified in the plan through the public infrastructure sidewalk program as well as the Senior Activity Center Nutrition program, as the building in which the Nutrition Program takes place in is a city-owned property. The City administers its grant funded programs (RENEWAL and Lead Safe and Healthy Homes) from City Hall as well.

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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	56	30
Number of Special-Needs households to be provided affordable housing units	0	0
Total	56	30

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	56	30
Number of households supported through Acquisition of Existing Units	0	0
Total	56	30

Table 6 – Number of Households Supported

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

The PY24 AAP called for supporting Housing projects through the allocation of CDBG funding. The City awarded funds to Subrecipients in order to achieve these goals as well as administered a property rehabilitation program and lead hazard reduction program in house to support the goals. Through RENEWAL, the City was able to provide 2 loans and 23 small grants to assist local homeowners. The loans were provided for sewer line replacements. Twenty five households received small grants to make necessary repairs including replacement of gas/electric water heaters, window replacement, water line

replacement, repairing subfloors, fixing plumbing and electrical issues, replacing electric/gas furnaces, roof replacement, and adding handrails to remediate safety issues. The City provided funding for its Lead Safe and Healthy Homes program. The City originally anticipated assisting 5 rental units and 15 single family dwellings; however, delays in the program due to lack of qualifying applicants (the applicants did not income qualify or have a child under age 6) as well as weather-related delays resulted in a slowdown of projects. This resulted in 5 dwellings receiving lead-based paint remediation with the CDBG match primarily being provided through service delivery for the Property Rehab Specialist to work on the units. The City will continue to use CDBG and look at ways to improve pricing through competitive procurement processes but also will adjust goals to reflect the delays in construction. PY24 goals included a total of 56 homeowner rehabs. The CDBG program was able to complete 30 rehab projects. Other delays such as weather, contractor availability, and project costs likely impacted the ability of the program to complete more rehabs; however, despite these setbacks, the City was still able to achieve over 53% of its goal for the program.

Discuss how these outcomes will impact future annual action plans.

These outcomes will allow for the City to adjust goals accordingly based off of the market, construction costs, staff capacity, and other impacts to outcomes. It is clear that priority project areas are still accurately reflected in the Consolidated Plan goals; however, the reduced annual entitlement allocation and increased cost of activities will necessitate a reduction in the anticipated number of units or households supported by the programs. In addition, the competition for qualified contractors and long periods to qualify applicants will affect program progress and may necessitate additional service delivery funding. As it becomes more and more challenging to qualify and determine eligibility of applicants as well as complete program requirements such as environmental reviews or procurement, the City will need to build in additional funding for overall project costs and plan for fewer total projects.

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	20	0
Low-income	6	0
Moderate-income	4	0
Total	30	0

Table 7 – Number of Households Served

Narrative Information

The CDBG program continues to reach the target income population for the program. As is demonstrated by the breakdown of income of households served, the majority are extremely low-income with 87% of all households served being at 50% or below AMI.

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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

The City partners with local non-profits and agencies to address homelessness and needs of homeless persons in Pocatello. Specifically, the City funds subrecipients who work with homeless persons to provide services that address their individual needs. In PY2, the City funded Aid for Friends, a non-profit located in Pocatello that provides direct services to homeless individuals and families in the City. The City funded partial acquisition of the new homeless shelter that was purchased by IHFA and underwent renovations, opening officially in 2021. The shelter provides up to 100 beds for homeless. The City contributed \$50,000 toward partial acquisition of the shelter. This program was planned for 5 years, enabling Aid for Friends to become a part-owner of the facility in each subsequent year. Program Year 202 represented the final year (year 5) of the project. In addition, the City funded AFF's transportation service program which provides Pocatello Regional Transit tickets to clients needing transportation to appointments, job interviews, etc. Finally, the CDBG program funded a case manager who works one on one with every client that uses the overnight shelter. These public services, PRT Tickets and Case Management, were provided through a subrecipient agreement for a total of \$21,530. PRT tickets served 170 beneficiaries and Case Management assisted 427 beneficiaries.

In addition to AFF, the City provided funding to Saint Vincent de Paul (SVDP) for public services that assist homeless populations. SVDP's social services program provides eligible applicants with a small funding appropriation to prevent homelessness through payment of outstanding bills and expenses. These clients also participate in the SVDP food bank program. A total of 78 clients were served by SVDP.

The City also participates in a number of groups and coalitions in order to address homelessness and reach out to individuals to both assess their needs and notify them of the available programs. Specifically, the City is in contact with the Pocatello Housing Authority and makes referrals to their programs as individuals call seeking assistance. The City is also a member of the Homeless and Housing Coalition of Southeast Idaho (Idaho's Region V Homelessness Coordinating Committee or IHCC) which is composed of 20 different public agencies and nonprofit organizations that address homelessness, affordable housing, mental and behavioral health, and social services. The Coalition meets monthly providing an opportunity to share CDBG program goals and outreach as well as learn about offerings from other agencies that could align with CDBG program goals. In addition, the Coalition participates in the Idaho Balance of State Continuum of Care (CoC) which works with the Idaho Homelessness Coordinating Committee (IHCC) and Idaho Housing and Finance Association (IHFA). The Committee collaborates to identify ways to reach the homeless population as well as conducts the annual Point in Time (PIT) count.

Idaho Housing and Finance (IHFA) is the agency designated by the State to administer these funds to those communities in Idaho that are not eligible to receive direct funding. The Continuum of Care plan funds are distributed through IHFA with input from regional coalitions. The City is not eligible as a recipient of other HUD funds, including HOME, ESG, or HOPWA.

The City will continue to use its partners to identify, understand, and support those experiencing homelessness (especially persons experiencing unsheltered homelessness) or at risk of homelessness with special needs in Pocatello.

Addressing the emergency shelter and transitional housing needs of homeless persons

The City of Pocatello has helped assist Aid for Friends with partial acquisition of a new public facility with planned funding from five program years for partial acquisition. Aid For Friends serves approximately 400 people annually (9,000-10,000 bed nights). The shelter operated in an 80-year-old structure. Because Aid For Friend's grant money from IHFA generally is used for client services, operational support of the shelter, and housing programs, using CDBG funding to assist with facility repairs allows the use of AFF's other funding directly for those costs. In PY2020, CDBG funds were used to assist with architectural and engineering expenses for the new shelter, and in PY2024, funding was allocated for partial acquisition of the shelter site. This was the fifth and final installment toward partial acquisition of the shelter. This has resulted in a total investment of \$250,000 in CDBG funds toward the AFF homeless shelter.

These are the only direct expenditures of CDBG funds for homeless persons; indirectly, the City's housing programs contribute to the prevention of homelessness by offering options for more affordable housing. Additionally, the City also pays for case management and bus tickets for AFF clients.

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 Pocatello does not directly participate in the discharge planning or protocols for persons leaving publicly funded institutions or healthcare systems or receiving assistance from public and private agencies (health care facilities, foster care or other youth facilities, or correction programs and institutions). All of the local agencies serving the homeless population work together to ensure that people receive the appropriate services. The agencies serving the homeless population maintain ties with institutions that release people from their care or custody, whether publicly or privately funded.

For instance, the local hospital, Portneuf Medical Center, contacts Aid For Friends when releasing a patient that does not have housing. Similarly, the Crisis Center will refer clients to AFF shelter and work

with the shelter to provide emergency housing. In 2018, Aid For Friends became the designated organization to be the community's single access point. This has helped individuals and families more efficiently gain access to needed services.

In PY24 specifically, the CDBG program supported Aid for Friends case management program which helps clients who may be recently discharged from publicly funded institutions and systems of care. Further, the CDBG program provided funding for the noted social services programs to directly assist the target populations described above.

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 City's efforts to support the transition of persons experiencing homelessness is accomplished through broad and flexible program support that allows service providers to adapt to clients' needs as economic and housing conditions change. This support includes funding:

- Emergency repairs and rehabilitation to preserve existing affordable housing and improve the housing conditions of existing low-income residents; and
- Supportive services provided by nonprofit organizations that help stabilize residents at risk of and experiencing homelessness. These include but are not limited to emergency assistance, case management, and transportation assistance

The City used its RENEWAL program along with funding for Lead Hazard Control and Healthy Homes work to conduct property rehabilitation programs that maintain the City's affordable housing stock and ensure low- and moderate-income residents can remain housed in safe, decent, affordable housing. Further, the City engaged with 6 Subrecipients who are local non-profit agencies that directly conduct programming to address the needs above.

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

Actions taken to address the needs of public housing

The City of Pocatello works closely with the Housing Alliance and Community Partnership (HACP), the City of Pocatello's Housing Authority. The Housing Authority participates in the Section 8 Housing Choice Voucher, Public Housing, and Move to Work programs. HACP administers the Housing Choice Voucher program through HUD and this program enables low-income families to obtain safe, decent, and affordable housing on the private market.

HACP manages public housing as well as Section 8 properties and unsubsidized affordable rentals. Christensen Courts receives federal aid under HUD's Public Housing Program and is a 72-unit apartment complex for elderly or disabled residents. Portneuf Towers is a 72-unit high rise complex for elderly or disabled individuals and couples, funded through the Section 8 New construction Program. In addition, HACP manages five other Section 8 New Construction properties: El Rancho Heights, Franklin Heights, Hawthorne Terrace, Stockman Terrace, and Swisher Terrace. These are multifamily properties that do not have an age or disability qualifier. For unsubsidized affordable rentals, HACP manages two multi-family Section 236 apartment complexes at McKinley Manor and Maple West Apartments. These rents remain affordable through a contract with HUD. HACP manages student housing for ISU students. Finally, HACP operates open market rentals at various apartment complexes to serve as a more affordable option for families that do not qualify for the HUD-funded programs.

During PY24, the CDBG program staff participated in the Region V Idaho Homelessness Coordinating Committee (IHCC) to better partner with service providers directly addressing the needs of public housing. Staff routinely provided referrals to HACP as well as shared resources such as grant opportunities with the HOME-ARP program. The City conducted a Fair Housing Training and HACP staff and relevant partners attended. The City's projects aim to focus on efficiently and effectively providing services and support to low- to moderate-income residents. These initiatives also help assist public housing residents and residents who receive a HUD housing voucher.

The City and HACP maintain a close working relationship and support each other's programs and goals to address affordable housing needs. This was strengthened by frequent communication between the entities and the CDBG program will continue to offer support and potential program funding in future PYs.

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

HACP has a resident advisory board and has clients of its services on its operating board. HACP is apprised of CDBG programs that may assist clients with homeownership, such as those offered by NeighborWorks Pocatello or Southeast Idaho Community Action Agency (SEICAA).

Actions taken to provide assistance to troubled PHAs

HACP is not designated as troubled.

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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)

Annually, the Pocatello City Council, Planning & Zoning Commission, and other governing boards and committees make a concerted effort to review the City's public policies, structures, fees, regulations, codes, and other provisions that may serve as barriers to affordable housing. The Council reviews the City's fee structure to ensure current rates do not inhibit development each fiscal year. Similarly, as projects move through the review process to Council approval, unintended barriers or potential issues that arise are reviewed by the Council and often included in the discussion for future review. In PY24, the City's Planning and Development Services Department re-applied for a PRO Housing grant to acquire funding to complete a zoning code rewrite and housing plan that would specifically look at barriers to affordable housing and identify housing needs. The City was unsuccessful in its application but continues to look for resources to address these needs and demands.

In its Fiscal Year 2025, the City allocated general funds to conduct a Housing Study along with a Fair Housing component. This project will take place in FY25 and be complete in FY26 (CDBG program year 2025). The plan will specifically look at public policies that serve as barriers to affordable housing such as land use controls, tax policies affecting land, zoning ordinances, building codes, fees and charges, growth limitations, and policies affecting the return on residential investment.

In addition, the City Council is committed to keeping the property tax level as low as possible. CDBG clients are encouraged to take advantage of the Homeowner's Exemption and the Circuit Breaker Exemption to reduce the tax burden on low- and moderate-income households. Finally, CDBG Staff work with local partners to solicit feedback regarding the effects of public policies and continue to incorporate that in daily decision making as well as provide that information to local elected officials. The City's Advisory Committees, including CDBG and Planning and Zoning, are composed of residents which helps ensure the target populations and those directly impacted by public policies are integral to and included in the decision-making process.

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

Consistent with the previous years' implementation of the City's CDBG entitlement funding, strong local partnerships have been paramount to addressing obstacles to meeting underserved needs. The City has numerous local partners and stakeholders and continues to grow this network of organizations. In PY24, the City awarded CDBG funds to eight local nonprofit social service agencies to address the needs of the community, specifically the City's low- and moderate-income populations.

Staff provides technical assistance on a day-to-day basis for current subrecipients and residents while also holding the annual technical assistance meeting for new partners or other interested organizations. The City's CDBG website serves as a repository for information while additional information is distributed through the City's Public Information Office, legal notices, advertisements in the Idaho State Journal, direct mailers, or email communication at public meetings or through public hearings.

City Staff present on programs at various meetings and meet one on one with potential service provider subrecipients. In addition, the City's Public Outreach and Grant Coordinator attends local events regularly and presents on the available programs offered by the Neighborhood and Community Services Division. The Outreach Coordinator also serves as a member of multiple community-based organizations and groups, creating a strong communication channel amongst the groups and organizations. Finally, the CDBG Advisory Committee holds monthly meetings to improve strategies for addressing obstacles.

The CDBG Program's Policies and Procedures also guide the program's work to address obstacles to underserved needs. The Language Assistance Plan was adopted to improve program accessibility for those individuals for whom English is not their primary language. In addition, the City ensures compliance with Section 3 when expending CDBG funds, adhering to the adopted policy. The program also references the Citizen Participation Plan within the 5-year Consolidated Plan to ensure depth of outreach. The City's broad base of partner agencies results in a robust referral system for those seeking assistance for whom CDBG funding is not an option. Overall, there are a vast array of resources, techniques, and policies the Neighborhood and Community Services Division implements to address obstacles; however, this is an iterative and continuous process to improve service delivery and ensure needs are being met in an ever-evolving program.

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

The City was awarded a lead hazard reduction and healthy homes grant award from the HUD Office of Lead Hazard Control and Healthy Homes (OLHCHH) in FY21. The grant award was for approximately \$2.6M to reduce lead-based paint hazards in homes with a particular emphasis on residences with children under the age of 6 who are most susceptible to the negative effects of lead-based paint hazards. As part of the grant award, the City allocated CDBG funding to serve as the match funding for the OLHCHH grant. In PY24, over XXX was used for eligible service delivery for the Property Rehab Specialist in BXXX qualifying homes. The Rehab Specialist was able to conducted Lead Inspection Risk Assessments, Health Homes Risk Assessments, contract management, contract oversight, and Clearances through the CDBG match. In addition to the direct remediation work, the City also partners with local agencies to provide outreach and education about lead-based paint hazards. The City distributes information and education materials, conducts presentations, conducts Lead Inspections/Risk Assessments on qualifying homes, and uses the healthy homes supplemental funding to further leverage HUD funds for necessary health and safety work.

In addition to the OLHCHH activities, the City administers its RENEWAL program and complies with the Lead Safe Housing Rule per CDBG requirements.

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

The objective of the CDBG program is to address the needs of low to moderate-income residents in Pocatello. Generally, the CDBG-funded programs for PY2024 work toward this end, whether through direct service delivery, contracted subrecipients, or infrastructure improvements that address accessibility issues. In PY24, programs delivered by local Subrecipients included: Aid for Friends Case Management services for homeless individuals or individuals facing homelessness; Aid for Friends Pocatello Regional Transit tickets for transportation services for clients; Boys & Girls Club program services; New Day Products case management services for their clients; Pocatello Free Clinic dental services program; Senior Activity Center nutrition program; and the St Vincent de Paul social service program to provide emergency subsistence payments. All clients served by these programs are verified as low- and moderate-income families or presumed as such due to the nature of the service (ie - homeless shelter services or food bank services).

In addition to the programs, the City has developed many partnerships with service providers, nonprofits, state agencies, and other entities to address issues affecting poverty. As in previous years, the City is exploring ways to improve workforce training and development as well as outreach to hard-to-reach populations. The City sponsored the Idaho State University Construction Combine which is a 2-day training for local students to learn construction field skills and be hired by participating contractors at the conclusion of the 2-day training. This builds a partnership between a workforce training center and the CDBG program staff, allowing for potential opportunities to collaborate in the future.

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

The City bases its community delivery system on CDBG federal regulation, guidance, and the City's adopted CDBG Program Policies and Procedures. In its 28-year history as an entitlement community, the City has developed many institutional structures inherent in the delivery system through internal operational procedures that ensure compliance. As subrecipients administer programs, these requirements are reviewed by staff, contained in contract terms and conditions, and staff is made available to provide technical assistance to ensure compliance. The City's Neighborhood and Community Services Division employs staff to implement the program who are required to complete training on CDBG programs and requirements to ensure compliance with federal regulations. In addition, the Neighborhood and Community Services Division is housed in the Planning and Development Services Department and works with the City's Finance Department to ensure continuity of the internal structure and implements cross-department checks and balances on program activities. The City's program is subject to City Council approval, with the CDBG Advisory Committee serving as the appointed body to make recommendations to the Council. A City Council member serves as a liaison to the CDBG Advisory Committee to foster communication on issues and keep the Council apprised of ongoing activity. Finally, the long-established relationships with community partners allow for frequent communication of issues, areas of success, and potential changes in institutional structure or service delivery.

Actions taken to enhance coordination between public and private housing and social service

agencies. 91.220(k); 91.320(j)

The City provides technical assistance to service agencies interested in utilizing CDBG funding through the technical assistance meeting or remote technical assistance offered on a case by case basis via email or phone communication as well as one-on-one meetings. The City participates in the Housing and Homeless Coalition to stay apprised of public housing and service agency housing activity. In PY24, the City conducted Fair Housing Activities that provided education and information for private and public housing entities. This included a social media campaign, newsletter, proclamation, and Fair Housing Training conducted by Intermountain Fair Housing Council in conjunction with Idaho Falls.

Regarding private housing, the CDBG program is housed within the Planning and Development Services Department, so there is frequent communication about ongoing or planned developments. This is enhanced with monthly department meetings. City Staff also report the number of issued permits to the CDBG Advisory Committee at their monthly meetings. The CDBG program goals and objectives are included in the City's Comprehensive Plan which was adopted in July of 2023, and includes actionable deliverables of which CDBG program goals and objectives are incorporated as applicable. Staff maintains open lines of communication so that partners can share project updates, and CDBG priorities can be shared externally. Overall, the City will continue its participation in various coalitions and work to address housing needs by leveraging opportunities for coordination amongst the various public and private entities.

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

Effective fair housing enforcement lies at the heart of a comprehensive program to affirmatively further fair housing. The structure of this program varies among communities based on community size and resources. To assure good standing for HUD's Community Planning and Development (CPD) programs, the jurisdiction should address any and all concerns expressed by HUD in contract conditions that relate to fair housing and equal opportunity performance as required by the laws and regulations governing these programs. These concerns include any and all court decisions relating to fair housing and other civil rights laws to which the jurisdiction or the PHA is subject. The City of Pocatello requires all Subrecipients of CDBG funds to comply with the Fair Housing Act and explicitly details this in the Subrecipient Agreement terms and conditions. Additionally, the City conducts extensive fair housing education and outreach. The City partners with the Intermountain Fair Housing Council and Idaho Legal Aid to refer clients and get outreach and education materials. In April, to recognize Fair Housing Month, the City Council adopted a proclamation declaring April Fair Housing Month and the City undertakes a Fair Housing Month social media campaign on its social media pages. The City co-sponsored a fair housing training with Idaho Falls in PY24 as well. Finally, City Staff are the primary points of contact and can utilize the Limited English Proficiency Plan to respond and be available to residents who may have a fair housing complaint or issue. In PY23, the City fielded one email communication regarding Fair Housing and provided necessary resources and options for the complainant.

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 City's adopted CDBG Policies and Procedures detail the processes that must be adhered to, ensuring compliance with all federal requirements and regulations when carrying out the CDBG Consolidated Plan, Annual Action Plan, and all other components of the CDBG program. Because the City implements the plans through subrecipient grant awards, the policies and procedures provide a detailed Subrecipient Monitoring process. The City's CDBG Grant Administrator/Compliance Analyst conducts the monitorings for those identified subrecipients per the process. In addition, after being awarded CDBG funding for eligible activities, subrecipients execute a Subrecipient Agreement which details the federal requirements they must adhere to including: activity eligibility, record retention, Section 3, Environmental Reviews, Davis Bacon, National Objectives, and monitoring. Additionally, when Subrecipients submit invoices for reimbursement, the City conducts a monitoring of the documentation in order to ensure the expense is eligible, allowable, and allocable. If determined to include sufficient backup, the City will process the reimbursement. Further, Subrecipients are required to provide year-end Annual Reports to the City, detailing program achievements, federal funding received for audit purposes, and beneficiary data broken down by race/ethnicity, disability, and income levels. Annually, CDBG staff conduct desk monitoring of Subrecipients based on a risk analysis outlined in the Policies and Procedures as well as following HUD guidelines.

In addition to Subrecipient requirements, the City contracts with vendors who perform public facility, public infrastructure, and rehab work. These contractors agree to the Project Agreement as well as General Terms and Conditions which outline HUD and program requirements, regulations, and laws. Included in this are Section 3 and Davis-Bacon Wage Act requirements. Payments for this contracted work undergo a similar in-depth, multi-level review as Subrecipient reimbursements.

Finally, the CDBG program uses public meetings and a public process to implement the Annual Action Plan and ensure compliance with program requirements. Procurements are conducted in a public manner, particularly requests for bids for projects exceeding \$50,000. These projects are advertised in a local newspaper, posted on the City website, and sent directly to contractors for solicitation. These solicitations encourage DBE and Section 3 businesses to submit responses to the solicitations. Projects exceeding \$200,000 must adhere to the Section 3 policy and a Section 3 business advantage is given to qualifying bidders for all project price thresholds from micro-purchases to large bids. City Staff maintain contractor lists and update them with licensed contractors annually. In addition, the City reviews the list of approved Section 3 business enterprises to solicit them if available.

Technical assistance is available to all subrecipients, grantees, contractors, and clients. This is provided daily as questions arise and staff contact information is made available to the public. Conformance with the Consolidated Plan is ensured through development of the strategic plans and implementation of the identified projects through eligible activities.

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's adopted Citizen Participation Plan details the required outreach for the Consolidated Plan, Annual Action Plan, amendments to the plans, and Consolidated Annual Performance and Evaluation Report. The City relies on citizen participation and feedback to ensure that plans, projects, and activities are addressing the community needs. This is particularly important for the target population (low to moderate income residents) and as such outreach is directed to these groups. Each plan solicits public comment through an advertised public comment period. This varies depending on the plan but provides an opportunity to provide written comment as well as an oral comment opportunity on the plans and reports. These notices are published in the local newspaper of general circulation, on the City's website, and at local agencies including: City Hall, the Housing Authority, the public library, and two agencies that serve the target population, LIFE Inc. and NeighborWorks Pocatello.

In addition, the Annual Action Plan comment period is followed by a noticed public hearing that takes place at the City Council meeting. This public hearing provides an opportunity for residents to make oral comments on the plans. These meetings are noticed, live broadcast, recorded, and available for future streaming and re-broadcast. The hearings are also held in an accessible location and accommodations are offered for those who may need them. They are part of the public record and all comments are submitted with the plans. Throughout the program year, the City holds monthly public meetings for the CDBG Advisory Committee with an opportunity for public to attend. In addition, a public needs hearing is held in the Fall ahead of the Annual Action Plan drafting in order to identify needs and ensure the needs align with Con Plan goals and AAP projects. For the performance report, the City holds a minimum 15-day comment period during which the public may submit written comments. This is advertised in a local newspaper, on the City website, and made available at locations throughout the community, including those noted above.

Finally, all City records are subject to the Idaho Records Law and HUD record retention requirements,

making them available to the public at any time. The plans are all published on the CDBG website along with contact information for CDBG staff in the event a member of the public has a question or

comment. Throughout the various planning processes and during the program year, there exists ample opportunity for citizens to participate in the processes whether as mandated by the Citizen Participation Plan, internal policies and procedures, HUD, the City, or inherent in the nature of the work conducted.

For the PY24 CAPER, a public comment period was held from June 13, 2025 through June 30th 2025. This comment period was advertised in a Legal Notice in the Idaho State Journal. In addition, the Notice of Availability for the CAPER and the draft CAPER was posted on the city website, in city hall, at NeighborWorks Pocatello, at the Marshall Public Library, LIFE Inc., and the Housing Authority. The City also held a CDBG Advisory Committee meeting on June 17, 2025 to allow for comment and review of the draft CAPER. This meeting was duly noticed and posted and was open to the public.

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.

Program Year 2024 represented year three of the five-year Consolidated Plan for program years 2022 through 2026. Based on the outcomes and accomplishments achieved during the program year, the jurisdiction is not inclined to change programs at this time. The City made progress on many goals identified in the Consolidated Plan and successfully assisted program beneficiaries beyond those anticipated in the strategic plan. The City will continue to work with local partner agencies to administer CDBG funds for activities that address housing, public infrastructure, public facility, public service, and planning activities. For housing activities, the City will continue to work with local partners to administer programs and leverage additional funding so more projects can occur. Similarly, the City was unable to achieve housing acquisition goals but is continuing to partner with local agencies to achieve this goal as the opportunity arises, particularly as the housing market shifts. Finally, the City is working with the local regional transit authority to improve outcomes in local public infrastructure activities, specifically through a more widespread sidewalk program that will target eligible low-moderate income areas in addition to low-moderate income individual residences. The City will also continue to seek additional funding sources, such as the competitive grant opportunities provided by HUD, to expand programming and allow for more funding to go toward the needs. Overall, continued work with partners, including governmental and nonprofit partners, will allow the jurisdiction to achieve more objectives identified in the Consolidated Plan; however, much of that success is limited to the funding available through the programs, as needs always exceed the available funding.

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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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.

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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	0	0	0	0	0
Total Labor Hours					
Total Section 3 Worker Hours					
Total Targeted Section 3 Worker Hours					

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

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

Narrative

All of the City's publicly advertised bids for CDBG include Section 3 language. In addition, those bids that exceed \$50,000 include Section 3 language and are posted in newspaper as well as on the city website. The CDBG program also directly solicits contractors and vendors for these bids, checking the Section 3 business registry for any new business concerns to add to the list. Larger City projects from the other municipal departments, such as engineering, include Section 3 language. Specifically, for projects that concluded in PY24, the City solicited bids for the Bonneville Neighborhood Sidewalk project that included language for Section 3 enterprises and a reference to the preference.

In addition, the City includes the Section 3 language in its bid solicitations for RENEWAL home rehab loan projects. There were 2 of these projects in PY24 with multiple bid solicitations. As a result, Outreach efforts to identify and secure bids from Section 3 business concerns totaled 3 activities.

Staff discusses the Section 3 preference with contractors with whom the City awards bids to in order to inform them of the benefits of the qualification. Section 3 regulations are included in all subrecipient and contract agreements as well.

Through public service programs such as the Aid for Friends bus tickets, New Day Products case management, and Saint Vincent de Paul thrift store vouchers, local partners provide and connect residents with supportive services that provide work readiness health screenings, interview clothing, uniforms, test fees, and transportation. These are parts of service projects and not standalone activities so they are not tallied above; however, they provide vital resources for job opportunities for disadvantaged residents. Finally, CDBG and LSHH staff volunteered at the Idaho State University sponsored Construction Combine event which provides trade skill training and workforce development for youth in the area high schools as well as individuals on probation. This capacity building event provides education, training, and the opportunity to be hired by local contractors. Staff participated in the event as volunteers, and the City served as a sponsor for the event. Staff were involved in the event planning meetings and day of conducting the event. As a result, this activity was counted for assisting residents to apply for, or attend vocational/technical training.