

## 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 2021 (PY21) was year five of the City's five year Consolidated Plan, which covered program years 2017-2021. The 2021 Consolidated Annual Performance and Evaluation Report (CAPER) reflects the activities conducted and expenditures made during PY21, which begins on April 1, 2021 and concludes on March 31, 2022. The CAPER outlines the progress made toward the goals identified in the Consolidated Plan and actualized through the PY21 Annual Action Plan (AAP). The Consolidated Plan details the following goals in its Strategic Plan: 1) Affordable housing production; 2) Homeownership assistance; 3) Housing rehab, emergency repair and accessibility modifications; 4) Sidewalk improvements; and 5) Supportive services and facilities improvements. In order to achieve these goals, the City adopted several projects in its PY21 AAP that were implemented through various eligible activities. PY21 projects included: Affordable Housing, Public Infrastructure, Public Facilities, Public Services, and Planning/Administration.

In PY21 the City was still dealing with the effects of the COVID-19 global pandemic, administering the Cares Act (CDBG-CV) funding along with its annual entitlement funding. CDBG-CV funded activities that took place during PY21 (April 1, 2021 - March 31, 2022) included emergency rental and mortgage assistance for those affected by the COVID-19 global pandemic and public service agency assistance to respond to, prepare for, and prevent COVID-19. Specific public service activities that had a PPR tieback included: short-term emergency rental assistance provided by Big Momma's House; New Day Products transportation services for disabled adults; Pocatello Free Clinic Health services; rental and utility assistance through Saint Vincent de Paul; and social service capacity building through the United Way of Southeast Idaho.

The City's PY21 AAP provided funding for the following activities to achieve Strategic Plan Goals: Residential rehabilitation loans and small grants through the City's RENEWAL program; Sidewalk improvements at qualifying LMC locations or LMA areas, as well as the removal of architectural barriers and mobility improvements; Acquisition in part for the Aid for Friends homeless shelter; Transportation services through Aid for Friends by providing homeless clients with tickets for the Pocatello Regional Transit Authority; Case management services provided to Aid for Friends clients; Public facility improvements at the Bannock Youth Foundation youth homeless shelter; Mobile home rehab and service delivery provided by NeighborWorks Pocatello; Transportation services for disabled adults provided by New Day Products; the Saint Vincent de Paul social services for the needy.

The City contracted with subrecipients in order to provide these services as well as implemented the RENEWAL and sidewalk programs in-house. In addition, 20% of PY21 funds were allocated to Planning & Administration costs to fund: fair housing activities, program administration, a grant writing workshop, and support the NeighborWorks Pocatello Low-Income Housing Tax Credit application for senior housing. Program Income derived from the housing rehabilitation loan programs was receipted in and applied to the subsequent drawdown in order to expend the funds first, ahead of entitlement funding. Program income went toward rehab, sidewalks, program admin, and subrecipient activities. CDBG continues to be a necessary funding source to provide critical services related to affordable housing, improvements to public facilities, and supportive services to low-moderate income populations in target areas as identified in the five-year consolidated plan and strategic plan.

**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 |
|-------------------------------|--------------------|--------------------------------------------------|----------------------------|------------------------|---------------------------|-------------------------|------------------|-------------------------|-----------------------|------------------|
| Affordable Housing Production | Affordable Housing | CDBG: \$ / HOME/SHOP: \$ / NWP - Match Funds: \$ | Rental units rehabilitated | Household Housing Unit | 0                         | 0                       |                  |                         |                       |                  |
| Affordable Housing Production | Affordable Housing | CDBG: \$ / HOME/SHOP: \$ / NWP - Match Funds: \$ | Homeowner Housing Added    | Household Housing Unit | 15                        | 1                       | 6.67%            |                         |                       |                  |

|                                                   |                                   |                                                          |                                                                                             |                        |     |    |         |      |     |        |
|---------------------------------------------------|-----------------------------------|----------------------------------------------------------|---------------------------------------------------------------------------------------------|------------------------|-----|----|---------|------|-----|--------|
| Affordable Housing Production                     | Affordable Housing                | CDBG: \$ / HOME/SHOP: \$ / NWP - Match Funds: \$         | Homeowner Housing Rehabilitated                                                             | Household Housing Unit | 0   | 0  |         |      |     |        |
| Homeownership Assistance                          | Affordable Housing                | CDBG: \$                                                 | Direct Financial Assistance to Homebuyers                                                   | Households Assisted    | 15  | 39 | 260.00% |      |     |        |
| Hsg Rehab, Emergency Repair and Accessibility Mod | Affordable Housing                | CDBG: \$ / City General Fund: \$ / NWP - Match Funds: \$ | Rental units rehabilitated                                                                  | Household Housing Unit | 10  | 4  | 40.00%  | 4    | 0   | 0.00%  |
| Hsg Rehab, Emergency Repair and Accessibility Mod | Affordable Housing                | CDBG: \$ / City General Fund: \$ / NWP - Match Funds: \$ | Homeowner Housing Rehabilitated                                                             | Household Housing Unit | 150 | 71 | 47.33%  | 40   | 39  | 97.50% |
| Program Administration/Fair Housing               | Program Administration            | CDBG: \$                                                 | Other                                                                                       | Other                  | 1   | 1  | 100.00% |      |     |        |
| Sidewalk Improvements                             | Non-Housing Community Development | CDBG: \$ / City General Fund: \$10000                    | Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit | Persons Assisted       | 0   | 0  |         | 1500 | 657 | 43.80% |

|                                                 |                                   |                                                                                                                                                                                  |                                                                                             |                  |      |      |        |     |   |       |
|-------------------------------------------------|-----------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------|------------------|------|------|--------|-----|---|-------|
| Sidewalk Improvements                           | Non-Housing Community Development | CDBG: \$ / City General Fund: \$10000                                                                                                                                            | Other                                                                                       | Other            | 6500 | 1500 | 23.08% |     |   |       |
| Supportive Services and Facilities Improvements | Non-Housing Community Development | CDBG: \$ / Subrecipient Match - Aid For Friends: \$30200 / Subrecipient Match - New Day Products: \$5552 / Subrecipient Match - Public Federal: \$ / Subrecipient Match: \$15000 | Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit | Persons Assisted | 0    | 0    |        | 100 | 0 | 0.00% |

|                                                 |                                   |                                                                                                                                                                                  |                                                                          |                  |   |     |  |     |     |         |
|-------------------------------------------------|-----------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------|------------------|---|-----|--|-----|-----|---------|
| Supportive Services and Facilities Improvements | Non-Housing Community Development | CDBG: \$ / Subrecipient Match - Aid For Friends: \$30200 / Subrecipient Match - New Day Products: \$5552 / Subrecipient Match - Public Federal: \$ / Subrecipient Match: \$15000 | Public service activities other than Low/Moderate Income Housing Benefit | Persons Assisted | 0 | 244 |  | 235 | 329 | 140.00% |
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|                                                 |                                   |                                                                                                                                                                                  |                                                  |                     |   |   |  |    |    |        |
|-------------------------------------------------|-----------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------|---------------------|---|---|--|----|----|--------|
| Supportive Services and Facilities Improvements | Non-Housing Community Development | CDBG: \$ / Subrecipient Match - Aid For Friends: \$30200 / Subrecipient Match - New Day Products: \$5552 / Subrecipient Match - Public Federal: \$ / Subrecipient Match: \$15000 | Tenant-based rental assistance / Rapid Rehousing | Households Assisted | 0 | 0 |  | 50 | 17 | 34.00% |
|-------------------------------------------------|-----------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------|---------------------|---|---|--|----|----|--------|

|                                                 |                                   |                                                                                                                                                                                  |                                   |                  |     |     |        |     |     |         |
|-------------------------------------------------|-----------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------|------------------|-----|-----|--------|-----|-----|---------|
| Supportive Services and Facilities Improvements | Non-Housing Community Development | CDBG: \$ / Subrecipient Match - Aid For Friends: \$30200 / Subrecipient Match - New Day Products: \$5552 / Subrecipient Match - Public Federal: \$ / Subrecipient Match: \$15000 | Homeless Person Overnight Shelter | Persons Assisted | 500 | 143 | 28.60% | 150 | 310 | 206.67% |
|-------------------------------------------------|-----------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------|------------------|-----|-----|--------|-----|-----|---------|

|                                                 |                                   |                                                                                                                                                                                  |                         |                  |      |     |        |   |     |  |
|-------------------------------------------------|-----------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------|------------------|------|-----|--------|---|-----|--|
| Supportive Services and Facilities Improvements | Non-Housing Community Development | CDBG: \$ / Subrecipient Match - Aid For Friends: \$30200 / Subrecipient Match - New Day Products: \$5552 / Subrecipient Match - Public Federal: \$ / Subrecipient Match: \$15000 | Homelessness Prevention | Persons Assisted | 1250 | 238 | 19.04% | 0 | 218 |  |
|-------------------------------------------------|-----------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------|------------------|------|-----|--------|---|-----|--|

|                                                 |                                   |                                                                                                                                                                                  |                       |      |   |   |  |    |   |       |
|-------------------------------------------------|-----------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------|------|---|---|--|----|---|-------|
| Supportive Services and Facilities Improvements | Non-Housing Community Development | CDBG: \$ / Subrecipient Match - Aid For Friends: \$30200 / Subrecipient Match - New Day Products: \$5552 / Subrecipient Match - Public Federal: \$ / Subrecipient Match: \$15000 | Jobs created/retained | Jobs | 0 | 0 |  | 97 | 0 | 0.00% |
|-------------------------------------------------|-----------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------|------|---|---|--|----|---|-------|

|                                                 |                                   |                                                                                                                                                                                  |                     |                     |   |   |        |  |  |  |
|-------------------------------------------------|-----------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------|---------------------|---|---|--------|--|--|--|
| Supportive Services and Facilities Improvements | Non-Housing Community Development | CDBG: \$ / Subrecipient Match - Aid For Friends: \$30200 / Subrecipient Match - New Day Products: \$5552 / Subrecipient Match - Public Federal: \$ / Subrecipient Match: \$15000 | Businesses assisted | Businesses Assisted | 5 | 1 | 20.00% |  |  |  |
|-------------------------------------------------|-----------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------|---------------------|---|---|--------|--|--|--|

|                                                 |                                   |                                                                                                                                                                                  |       |       |      |     |        |      |   |       |
|-------------------------------------------------|-----------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------|-------|------|-----|--------|------|---|-------|
| Supportive Services and Facilities Improvements | Non-Housing Community Development | CDBG: \$ / Subrecipient Match - Aid For Friends: \$30200 / Subrecipient Match - New Day Products: \$5552 / Subrecipient Match - Public Federal: \$ / Subrecipient Match: \$15000 | Other | Other | 2000 | 514 | 25.70% | 1377 | 0 | 0.00% |
|-------------------------------------------------|-----------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------|-------|------|-----|--------|------|---|-------|

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

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

Program Year 2021 saw many accomplishments achieved through various programs including those that addressed: Housing Rehab, Emergency Repair and Accessibility Modifications; Sidewalk Improvements; and Supportive Services and Facilities Improvements. Housing Rehab, Emergency Repair and Accessibility Modifications included the City's RENEWAL small grant and loan rehab program which assisted 21 low-moderate income clients through 17 grants and 4 loans. In addition, NeighborWorks Pocatello provided 18 low-moderate income clients with mobile home repair grants, many of whom also received loans through their matching funds.

Sidewalk improvements included an individual sidewalk project at N. Harrison Ave to provide accessibility improvements and the removal of

architectural barriers for 2 beneficiaries as well as the completion of sidewalk and ADA ramps on S. 1st street to connect to an existing pedestrian walkway that would result in an area benefit for 655 beneficiaries based on census tract data.

Supportive services and facility improvements primarily consisted of: homelessness prevention through the Aid for Friends bus ticket program and Case Management services for homeless individuals which resulted in assisting 218 unduplicated clients; the Aid for Friends shelter acquisition which provided a homeless person overnight shelter for 310 unduplicated clients in the program year; and public service activities conducted by Saint Vincent de Paul, New Day Products, and Salvation Army. SVdP provided social service assistance to 244 unduplicated clients and New Day Products provided transportation services to 85 beneficiaries all of whom were disabled adults. Salvation Army provided short-term rental assistance (tenant-based rental assistance) to 17 unduplicated client households.

In addition to those completed projects, several projects are ongoing for PY21 and will be completed in PY22. This includes Public Facility improvements at the Bannock Youth Foundation homeless youth shelter, Saint Vincent de Paul food bank and social service center, and Family Services Alliance domestic violence shelter. Once completed, these projects will add to the goal outcome indicators articulated for the program year. Delays to these projects were driven by the late award and release of CDBG PY21 funds and construction delays due to bidding, supply chain, and availability of contractors.

## 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                                     | 737        |
| Black or African American                 | 16         |
| Asian                                     | 8          |
| American Indian or American Native        | 88         |
| Native Hawaiian or Other Pacific Islander | 20         |
| <b>Total</b>                              | <b>869</b> |
| Hispanic                                  | 149        |
| Not Hispanic                              | 766        |

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

### Narrative

In Program Year 2021, a total of 1,570 beneficiaries were reported. Of the 1,570 beneficiaries, 655 were calculated through the census dataset used for the low-moderate service area for the sidewalk at S. 1st Ave. Therefore, only 915 individual records of beneficiary data were collected.

In addition, IDIS allows for the input of "Other multi-racial" on the Activity accomplishment data screen. This is not available to report in the CAPER in CR-10 so that total was not included in this summary above for race. A total of 46 beneficiaries identified as Other multi-racial. Excluding these 46 and the sidewalk beneficiaries, the total reported is 869 in the race category.

The racial distribution mostly reflects that of the population trends in Pocatello with the majority (about 81%) of reported beneficiaries identifying as White. However, it should be noted that the CDBG programs tended to assist a higher percentage of other races than is reflected by the census, as is shown in the following chart:

\*Note: the 46 beneficiaries that identified as Other multi-racial were used to calculate the percentage in this category. For each category, the total of 915 beneficiaries was used to acquire the percentage.

This data demonstrates, and is in line with other research and information, that populations of color or those that identify as a race category other than white, have higher proportions of low to moderate income populations that utilize the services provided by the local non-profit agencies and CDBG. With the exception of those that identify as Asian, every other race category shows a higher number of CDBG beneficiaries as compared to the census distribution.



## 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 | 989,335                  | 543,918                             |
| Other           | private          | 103,447                  | 128,707                             |
| Other           | public - federal | 103,447                  | 128,707                             |
| Other           | public - local   | 103,447                  | 128,707                             |

**Table 3 - Resources Made Available**

### Narrative

The resources made available comes from the Annual Action Plan submitted for PY2021 from section AP-15 Expected Resources, which allocated \$561,169 in CDBG funds and \$765,252 in Other Sources (primarily leveraged funds). The table has been updated to more closely reflect the actuals as follows:

- The City's PY21 entitlement totaled \$461,585
- The updated PR-26 makes note that previous year unexpended CDBG funds total \$527,749.58
- Program Income for PY21 was \$103,447.04 (in "Other" category above)

This totals \$1,092,781.62 as seen on the PR-26.

During PY21, the City allocated funding toward the following projects using both the entitlement and program income:

- Housing - \$94,226.94
- Public Infrastructure - \$25,000
- Public Facilities - \$177,243.36
- Public Services - \$84,710.96
- Planning & Admin - \$113,007.20

These project areas funded the RENEWAL program, NeighborWorks Pocatello (NWP) Mobile Home Repair grant, Sidewalk replacement, Aid for Friends shelter acquisition, St Vincent de Paul parking lot, Bannock Youth Foundation roof, Family Services Alliance parking lot, AFF bus tickets, AFF case management services, New Day Products Transportation services, Salvation Army rental assistance, SVdP social services, and NWP LIHTC application. In addition, Admin & Planning were accounted for in this allocation.

In the Program Year, all projects were drawn except for the FSA parking lot and SVdP parking lot. These programs are underway and will be completed during PY22. The Bannock Youth Foundation roof (\$11,913) and the Salvation Army rental assistance (\$9552.71) were obligated and reimbursed to the subrecipient but not drawn in IDIS. This will occur in draws completed during PY22 but are included here

as the activities occurred in PY21. The draw report in IDIS also includes funding for the New Day Products roof replacement project which was a PY19 and PY20 project. This has been removed from the total, as it was reported in the 2020 CAPER.

PY21 saw a total of \$103,447.04 in Program Income receipted and spent. Match funding totaled \$25,260 (see detail in leveraging section). PI and Match totaled \$128,707.04 to account for the Other category above. The City used the PR-26 to calculate total spent. This was \$647,364.70. Subtracting the "other" PI funds, this is equal to \$543,917.66 in CDBG funds. CDBG funds plus PI and match total \$672,624.70.

To calculate the totals, the City used the PR-26 report line 09.

CDBG-CV resources are not accounted for in these totals. However, the City expended \$275,160.77 in PY21 for CDBG-CV activities including rental and mortgage assistance as well as public services activities that respond to, prepare for, and prevent the COVID-19 pandemic.

#### Identify the geographic distribution and location of investments

| Target Area           | Planned Percentage of Allocation | Actual Percentage of Allocation | Narrative Description   |
|-----------------------|----------------------------------|---------------------------------|-------------------------|
| Central Neighborhoods | 85                               | 79                              | Locally Designated Area |

**Table 4 – Identify the geographic distribution and location of investments**

#### Narrative

CDBG funding is used for eligible activities that benefit the target population of low-moderate income Pocatello residents. While activities can be completed Citywide for qualifying beneficiaries, the majority of activities serve the LMI populations living in the City's Central Neighborhoods. These Central Neighborhoods are comprised of the following: Alameda, Bonneville, College, Lewis & Clark, Mountainview, and Neighborhoods of Historic Downtown Pocatello. The partnering agencies that are funded through CDBG for public services, housing, and infrastructure activities are also located in these Central Neighborhoods (NeighborWorks Pocatello, Bannock Youth Foundation, Saint Vincent de Paul, and Salvation Army) and the available HUD census tract data indicate that the tracts with LMI populations greater than 51% of the total population fall primarily in these Central Neighborhoods. A focus on these neighborhoods allows the City to best address the needs of the target populations and happens inherently due to where the greatest need and demand for services is.

For PY21, activities that served 100% of the Central Neighborhoods included: New Day Products transportation services, Salvation Army rental assistance, Saint Vincent de Paul social services, Bannock Youth Foundation Roof, NeighborWorks Pocatello Service delivery, and the City Sidewalk projects. Of the remaining projects, NeighborWorks Pocatello mobile home grants serviced residents outside of the central neighborhoods but still met the LMI criteria. About 42% of the City's rehab grants served

residents outside of the central neighborhoods while 11 of 19 projects or about 58% served those in Central Neighborhoods. For the rehab loans, 2 were in Central Neighborhoods and 2 were outside of Central Neighborhoods. While not achieving 85%, all of the programs served Pocatello residents who met the LMI criteria.

## 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 leverages resources primarily through in-kind personnel expenses and match provided by partnering agencies. Family Services Alliance, the Bannock Youth Foundation, and Saint Vincent de Paul all provided matching amounts for the approved public facilities projects. However, these projects will be completed in PY22 and therefore are not reflected in the PY21 CAPER with the exception of the Bannock Youth Foundation roof. A total of \$3000 was provided in match funding. NeighborWorks Pocatello provided a match for the mobile home repair grant program for a total of \$22,260 in the form of additional rehab loans to complete work that the grant cannot cover. In addition, CDBG served as a match to the Lead Safe and Healthy Homes program. The City was awarded an FY21 grant in November and CDBG staff were able to attend a Lead training conducted by the grant for local contractors. This is an example fo the in-kind support provided through other Division funding that is available. As PY22 commences, the CDBG program will be used to match the LSHH projects and lead-based paint remediation work will be conducted through that grant. A specific activity for this will be used and tracked in IDIS.

In addition, other city staff and personnel provide technical assistance and in-kind support to the NCS Division for the CDBG program. This often is in the form of staff review of bid documents, staff review of specifications, information sharing and outreach, and data collection. The amount of staff time spent on this is highly variable and challenging to track so it is not calculated in the summary above but is included here as a leveraged resource.

The City did not use publicly owned land or property located in the jurisdiction to address the needs identified in the plan with the exception of the repair of sidewalk on S. 1st avenue which is a publicly owned right of way. This project removed architectural barriers and improved mobility through the installation of new, compliant sidewalk and an ADA ramp.

## 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  | 44            | 39        |
| Number of Special-Needs households to be provided affordable housing units | 0             | 0         |
| <b>Total</b>                                                               | <b>44</b>     | <b>39</b> |

Table 5 – Number of Households

|                                                                      | One-Year Goal | Actual    |
|----------------------------------------------------------------------|---------------|-----------|
| Number of households supported through Rental Assistance             | 4             | 0         |
| Number of households supported through The Production of New Units   | 0             | 0         |
| Number of households supported through Rehab of Existing Units       | 40            | 39        |
| Number of households supported through Acquisition of Existing Units | 0             | 0         |
| <b>Total</b>                                                         | <b>44</b>     | <b>39</b> |

Table 6 – Number of Households Supported

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

During Program Year 2021, the City conducted its RENEWAL home rehab small grant and loan program. In addition, the City funded the NeighborWorks Pocatello Mobile Home rehab grant program through a subrecipient agreement. Overall, through these efforts, the City was able to provide rehabilitation of 39 housing units. While this was short of the goals noted in the Annual Action Plan, this still represented 88.6% of the goal and was only one unit shy of meeting the rehab of existing units.

Through NeighborWorks Pocatello (NWP), the City funded the rehab of 18 mobile homes. This is IDIS activity #246. The beneficiaries of this program included 5 extremely low clients, 5 low-income clients, and 8 moderate income clients. Of these clients, 16 identified as white (10 of whom were disabled) and 2 identified as American Indian/Alaskan Native (2 of whom were disabled). Through the City RENEWAL program, IDIS Activity #212, 21 homes were rehabbed. This included 4 loans and 17 small grant projects. Of the 21 beneficiaries, 7 were extremely low income, 7 were low income, and 7 were moderate income. Of the beneficiaries, 16 identified as white and 5 as other/multi-racial.

While the City made strides in reaching its goals, the primary challenge was the lack of staff capacity. The City did not have a Property Rehabilitation Specialist on staff until December of 2021 which inhibited project progress. In addition, the PY21 AAP called for 4 rental unit rehabs through the Lead Safe and Healthy Homes program; however, that program had already completed its match requirement and no rental units qualified for CDBG rehab during the program year. The LSHH program ended in July of 2021 so this was not a feasible goal included in the PY21 AAP and should have been updated to reflect the grant status. Finally, the COVID-19 pandemic resulted in several market and supply chain issues. This delayed delivery of construction materials and made for a saturated market. This made it challenging to secure contractors and complete jobs in the construction season. As a result, fewer rehabs occurred in PY21 than anticipated.

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

These outcomes will shape future action plans by ensuring more reasonable goals are in place, particularly for those projects to be matched by CDBG for the Lead Safe and Healthy Homes program. In addition, an understanding of the delays due to market conditions and the supply chain will influence the goals for units completed. However, the City is at full staff capacity so goals will be adjusted to account for the full complement of staff, in particular the rehab specialist who manages the RENEWAL program. Overall, AAP goals will be based on the Consolidated Plan goals, available funding, need for the program, and feasibility for completing the units.

#### **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               | 12                 | 0                  |
| Low-income                         | 12                 | 0                  |
| Moderate-income                    | 15                 | 0                  |
| <b>Total</b>                       | <b>39</b>          | <b>0</b>           |

**Table 7 – Number of Households Served**

#### **Narrative Information**

Throughout the program year, subrecipients collect beneficiary data to be reported as CDBG funds are drawn and/or with the final performance report per the City's subrecipient agreement. NeighborWorks Pocatello verifies the income of applicants for their mobile home repair grant program using the 1040 adjusted gross income method the City has adopted in its policies and procedures. After determining income, it is referenced with the CDBG income limits established by HUD in order to determine if the client is extremely low, low, or moderate income. The City follows the same process for the small grant and loan home rehab program. Based on the income verification, 12 clients were identified as extremely low income, 12 were low-income, and 15 were moderate income.

## **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**

To address homelessness in Pocatello, the city partners with local non-profits and agencies. Specifically, the City funds subrecipients who work with homeless persons and address their individual needs. In PY21, 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 will continue for 5 years, enabling Aid for Friends to become a part-owner of the facility. In addition, the City funded AFF's transportation service program by providing Pocatello Regional Transit tickets to those in need. Finally, the CDBG program funded a case manager who works one on one with homeless individuals. These services were provided through a subrecipient agreement for a total of \$81,350.

In addition to AFF, the City provided funding to Saint Vincent de Paul and Salvation Army to provide short-term assistance. SVdP's social services program provides eligible applicants with small funding appropriations to prevent homelessness or pay for outstanding bills and expenses. These folks typically participate in their food bank program. In addition, Salvation Army provided rental assistance for qualifying applicants. This also served to prevent eviction and homelessness in most cases.

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 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 quarterly 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 attendance at the Coalition, the City also 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).

### **Addressing the emergency shelter and transitional housing needs of homeless persons**

As previously noted, the City awarded Aid for Friends funding for services as well as for the acquisition of the new homeless shelter. This shelter addresses the demand for homeless services and temporary

stays for residents of Pocatello. This is the only shelter of its kind in the region and offers space to accommodate up to 100 individuals, including family spaces and dedicated male and female spaces. In addition, the City funded a public facility project for the Bannock Youth Foundation. Through this subrecipient agreement, the City's CDBG program funded the replacement of the roof on the Foundation's Bannock House - the youth homeless shelter. The City addressed transitional housing through partnerships with other organization through its CDBG-CV (CARES Act) funding but did not fund any specific activities in PY21 for transitional housing. All funded activities to address this need went toward emergency shelter.

**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 engages with its partners and uses these relationships to collaborate and address low-income individuals and families to avoid becoming homeless. Through subrecipient agreements with Saint Vincent de Paul and Salvation Army, the City has used CDBG funding for short-term rental assistance and subsistence payments. While these are subject to the public services cap and there is limited funding available, the City was able to award \$23,000 to SVdP for their social services to the needy program and \$10,000 to Salvation Army for rental assistance. Through the social services program, SVdP provided 244 clients with small monetary stipends to pay for utilities or rent. Of these clients, 234 were extremely low income and 10 were very low income. This assistance helped those individuals and families avoid becoming homeless. Similarly, Salvation Army provided rental assistance to clients. This assistance was in larger quantities and estimated to help 10 individuals or families.

In addition to public services, the City partners with the Aid for Friends shelter to assist homeless individuals or bridge the gap for those potentially becoming homeless. The AFF shelter, PRT tickets, and case management services all work together to help those families and individuals. Similarly, the City funded the Bannock Youth Foundation roof replacement in order to ensure the youth shelter would be repaired and stay operable. This directly address homeless youth and those removed from foster care.

Similarly, the City provides fair housing resources through its administrative and planning funds. This enables the City to provide fair housing resources to those residents who may face discrimination based on disability status or family status, particularly after being discharged from an institution or system of care. The City works with local agencies such as the Intermountain Fair Housing Council and Idaho Legal Aid to assist those individuals and families who may be vulnerable to homelessness, facing homelessness, or homeless due to fair housing act violations.

Finally, the City leveraged other funding to address these issues. Through the Lead Safe and Healthy Homes (LSHH) program, the City sponsored the Construction Combine, a 2-day workforce capacity

building event for local students and those released from juvenile correctional facilities on probation to learn trade skills and become a potential hire for participating contractors. Similarly, CARES Act, CDBG-CV, funding was used to provide rental assistance to those affected by COVID including low-income individuals and families being discharged from systems of care and in need of rental assistance.

**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**

As noted, the City partners with the Aid for Friends homeless shelter in order to directly help homeless persons. New in PY21 was the funding for the AFF Case Manager. CDBG was used to fund personnel expenses for the Case Manager position. Through this position, the manager was able to work one-on-one with homeless individuals to help them transition to permanent housing and independent living. The Case manager assists homeless individuals and households staying at the emergency shelter longer than 3-4 days to develop personalized goals, identify and resolve barriers to housing. Clients are connected to other community resources that provide physical and mental health treatment, counseling services, job search, employment opportunities, training programs and Health and Welfare for food stamps or WIC assistance. Throughout the program year, 135 clients were assisted.

In addition, the City partners with the Bannock Youth Foundation which assists unaccompanied youth. The BYF shelter, which was a facility project in PY21, is integral to this work. Finally, the City collaborates with other regional entities and local non-profits and agencies through its participation on the Homelessness and Housing Coalition.

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

### **Actions taken to address the needs of public housing**

In PY21, the CDBG program did not directly fund activities with the City of Pocatello's Housing Authority, the Housing Alliance and Community Partnerships (HACP). Although direct services were not funded through a subrecipient agreement, the City does engage with the HACP to address the needs of public housing through a variety of other programs and through planning/administration funds. Annually, the HACP submits its federal funding plan for HUD approval. As part of this process, the HACP presents its plan to the CDBG Advisory Committee as well as the City Council. The plan's Certificate of Consistency is signed off by the authorized organization representative (Mayor) as well. In addition to feedback provided on the federal funding plans, the City and HACP work collaboratively on messaging and outreach for their respective programs. The City has made referrals to HACP and HACP has worked in tandem with the City as it implements its COVID-19 rental assistance program. This also applies to Fair Housing training, as the City has collaborated with the HACP to provide administrative/planning funding for Landlord-specific training to improve fair housing education in the City. As a result of improved collaboration, the City has included funding for HACP programs paid for through the CDBG-CV funding and in the PY22 action plan. By working with the HACP, the City can assist the PHA which operates Christensen Courts, a 72-unit public housing development that provides 72 units for elderly and residents with disabilities.

The Pocatello City Council meets in work session with the HACP each year to discuss mutual concerns and upcoming projects. CDBG staff had several meetings with HACP staff to explore partnership opportunities to help aid the community with job training and new housing opportunities. This resulted in funding through the CARES Act, CDBG-CV, program and a future PY22 CDBG award to the HACP.

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

The HACP works directly with agencies who frequently partner with the City through the CDBG program such as NeighborWorks Pocatello (NWP) and Southeast Idaho Community Action Agency (SEICAA). Through this partnership, NWP and SEICAA have qualified individuals for loans to purchase infill developments funded through CDBG or the service delivery in previous program years. The HACP recently applied to become a Moving to Work PHA, allowing them greater flexibility with funding so that they can provide residents with opportunities for employment training, education, resource access, and more. Education and employment training will prepare residents for homeownership. Specifically, first time homebuyer courses or participation in NWP programs will enable this. Finally, as PHA residents are engaged with the HACP and its services, they are more likely to be engaged in the management of public housing and serve on the HACP Board or through other means.

**Actions taken to provide assistance to troubled PHAs**

N/A

## **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 Council annually reviews policies, structures, and financial operations of the City. Included in this is the annual review of the fee structure as part of the budgeting process. The fee structure may present barriers to affordable housing and therefore the review is critical to preventing barriers. Similarly, as property taxes continue to increase and the demand on the market results in increased property values and rent prices, more barriers to maintaining affordable units or allowing entry into the home buying market arise. The City Council is committed to keeping property taxes as low as possible and encourage qualifying residents to apply for the Circuit Breaker or Homeowner's tax exemption.

In addition to budgetary measures, the City is making a concerted effort to plan for and allow development so as to alleviate the demand on the housing market. Through the Historic Downtown Pocatello plan, the Planning & Development Services (PDS) Department, which houses the CDBG program, proposed multi-unit and mixed use development in the downtown to create more housing and address needs. CDBG staff were consulted on the plan prior to submission for approval by Council. Similarly, the PDS Department is updating the City's Long Range Plan - the Comprehensive Plan. CDBG provided feedback on the plan during the public comment period and will continue to be involved in the drafting as the plan progresses. Because CDBG is housed in the PDS Department, concerns about policies can be readily discussed and addressed. In addition, the department regularly discusses affordable housing concerns and needs.

Finally, the City implements the RENEWAL small grant and loan housing rehabilitation program. As property taxes increase, it is harder for low-moderate income homeowners to address home rehab work especially if they are on fixed incomes, as is common with elderly residents. Through the RENEWAL program, residents are able to address required repairs which preserves the City's affordable housing stock as well as elevates the subject property providing more financial stability for the homeowner. These repairs can also address tertiary effects such as water bills or code enforcement issues as they can result in new infrastructure and pay for a code expense that otherwise could not be fixed. As a result the RENEWAL program helps remove or ameliorate negative effects and barriers to affordable housing.

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

CDBG funding is limited in its ability to address all underserved needs and the City faces obstacles addressing this each program year. However, long-established and developed collaborative partnerships enable the program to reach beyond the available funding. The City has numerous local agency and private non-profit partners who implement programming that either receives CDBG funding directly through subrecipient agreements or they implement programs that complement CDBG activities, goals,

and objectives. In order to maintain these partnerships, as well as develop new ones, the City is represented on several public bodies, boards, commissions, and local community groups. The Neighborhood and Community Services Division within the PDS Department, which manages the federal grant programs, employs an Outreach Coordinator who attends the NeighborWorks Pocatello Council of Governments meetings. The Council is composed representatives from the City's Neighborhood Associations who provide feedback and updates on target neighborhood activities and needs. Participation at these meetings allows for sharing of program updates and gathering public feedback from the target population on needs. Similarly, the Outreach Coordinator provides updates to the local School District #25, Head Start early childhood programs, Bannock Youth Foundation Baby Steps program, Pocatello Rotary Club, and more. The Outreach Coordinator will attend local events as well including the annual back to school backpack give-away which has over 5,000 attendees and the City's annual Environmental Fair. The NCS Division also sits on the Homelessness and Housing Coalition and the Idaho Fair Housing Forum. This outreach and attendance fosters new partnerships, educates the community about the program and expands the reach of CDBG to understand unmet needs and obstacles to address those concerns.

In addition to in-person attendance, the City promotes the CDBG programs on its dedicated website, through the publishing of legal ads when HUD-mandated plans are available for public comment, through its monthly advisory committee meetings which is composed of neighborhood association liaisons, various public meetings, and the publishing and promotion of information on the City's social media and other media markets through the City's Public Information Officer.

The City holds an annual technical assistance meeting ahead of the program year application period for local agency partners. This provides an opportunity to learn about available CDBG funding and eligible activities while also soliciting feedback from partners to learn about underserved needs and areas of focus. In addition, the City holds a public needs hearing ahead of the application review in order to solicit needs from the public and community at large. All hearings are noticed, available to the public, televised live, and recorded for future rebroadcast and viewing.

Finally, the City uses its planning and administrative funds to provide technical assistance on an as-needed basis as well as to address other obstacles to meeting underserved needs. The City conducted a grant writing workshop in PY21 for local agencies to provide capacity building, education, and improve opportunities for securing funding to address citywide needs. The City also adopted CDBG policies and procedures that address obstacles such as language barriers, through its Language Assistance Plan, and employment through its Section 3 policy.

There are myriad resources available in the community and CDBG works to complement and implement policies, procedures, and programs to better meet underserved needs particularly through enhanced collaboration and partnerships with local agencies. These established relationships foster community-building and extend the reach of the programs beyond direct financial assistance.

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

The City was awarded a Lead Head Control Grant through HUD's Office of Lead Hazard Control and Healthy Homes (OLHCHH) in FY17. The grant closed out in July of 2021. The City re-applied for the FY21 Lead Safe and Healthy Homes (LSHH) grant and was awarded approximately \$2.6M for lead hazard control and healthy homes supplemental work. As part of this award, the 10% LHC match is to be provided by CDBG for eligible activities. The City operates the LSHH program out of the NCS Division and works closely with CDBG Staff to implement the program. Through the FY21 grant, the City was able to complete start-up activities including policies and procedures as well as a work plan and tier 1 environmental review for LHC and HHSUPP work during the CDBG PY21. The City also conducted a Lead Abatement Worker and Lead Abatement Supervisor training to ensure contractors were qualified and certified to complete lead remediation work in compliance with EPA requirements. The City collected applications from qualified residents and trained the Property Rehabilitation Specialist to be a certified Lead Inspector/Risk Assessor through the EPA as well. The rehab specialist and Lead Program Administrator conducted LIRAs on qualifying homes in PY21.

CDBG will serve as a match to the LSHH program throughout its 3.5 year period of performance. It was included in PY21 and will be included in the future program year annual action plans. The goals of the LSHH program include remediation of hazards in up to 100 homes as well as healthy homes supplemental work in up to 100 homes. Included in this will be education, outreach, training, and capacity building to address future lead hazard concerns. Education efforts have been spearheaded by the Outreach Coordinator to date.

In addition to the LSHH Program, the City utilizes the RENEWAL program to remediate lead hazards identified in those program applicants' homes. The City implements HUD's Lead Safe Housing Rule for all of its programs. As programs are conducted that may trigger the Lead Safe Housing Rule, City Staff or Subrecipients will complete the Lead Safe Housing Rule Applicability Form to determine if the property is receiving federal funds, was constructed before 1978, and if it meets any of the regulation exemption statements identified in 24 CFR 35.115. The City completed an internal check on applicants receiving over 100 days of short-term rental assistance through the CDBG-CV program as well.

Overall, there are many ongoing efforts to reduce lead-based paint hazards. Pocatello is home to some of the oldest housing stock in Idaho, with the majority constructed before 1978. As such, these programs are well utilized and continue to provide valuable health and safety improvements to the low and moderate income populations in the community.

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

In PY21, CDBG funded a number of activities to address issues faced by poverty-level families. These activities ranged from housing to public infrastructure as well as public facility and public service programs. All activities worked toward achieving CDBG Con Plan goals of providing affordable housing and suitable living conditions for low to moderate income residents. These activities were housing,

public facility, public infrastructure, and public service projects. Housing activities consisted in the City's RENEWAL program, NWP mobile home repair grants, and the planning funds dedicated to NWP's application for a Low Income housing Tax Credit (LIHTC). The rehab projects and the new low-income housing for seniors will alleviate the housing cost-burden for clients. The City also funded Public Infrastructure activities including sidewalk repair/replacement. In PY21, CDBG funded the replacement of a sidewalk for a qualifying LMI client. This alleviates the cost burden of the repair, removes any potential code violations, and creates an accessibility improvement.

Public facilities and public services were conducted through subrecipient agreements. CDBG funds were used for public facility activities including the roof replacement on the Bannock Youth Foundation's youth shelter and the partial acquisition of the Aid for Friends homeless shelter. Both shelters provide a necessary emergency sheltering option for those homeless individuals and families as well as those on the verge of homelessness. This stopgap is necessary to avoid a further decline into poverty for these clients and can be the vital resource to move them into permanent housing. In addition to the shelter projects, the PY21 CDBG funds were also dedicated to the Family Services Alliance parking lot and foundation repairs as well as the St. Vincent de Paul accessibility repairs. Both projects are underway in PY21 but have not yet been completed. The FSA repairs will enable the agency to continue operation of its domestic violence shelter and service facility. This is a vital service for those suffering from domestic violence particularly if the client faces poverty and does not have financial resources to leave the dangerous situation. St. Vincent de Paul operates a food bank and social services program at its facility. The ADA accessibility improvements will allow them to continue to provide this service to extremely low, low, and moderate income residents who need this assistance to avoid further financial burdens. Public services provide direct assistance to LMI residents in the form of: Aid for Friends bus tickets, Aid for Friends case management services, New Day products transportation services, Salvation Army rental assistance, and St. Vincent de Paul social services. All services assist those extremely low, low, and moderate income residents with necessary services to help reduce poverty-level families.

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

Pocatello's Community Development Block Grant (CDBG) program is managed by the Neighborhood and Community Services Division, a Division within the City's Planning and Development Services Department. The NCS Division is overseen by the CDBG Program Coordinator who reports to the Planning and Development Services Director. The CDBG program is governed by the CDBG Policies and Procedures which were adopted by City Council. These Policies and procedures reflect the institutional structures that ensure the management and administration of the CDBG program is in accordance with all federal requirements, guidelines, and rules. Policies and procedures dictate purchasing procedures through its procurement policies, subrecipient monitoring, project management, language assistance plan, section 3 policies, affirmative marketing and procedures specific to programs such as the RENEWAL home loan and sidewalk infrastructure programs.

In addition to the Policies and Procedures detailed in the CDBG Manual, staff complies with internal controls for financial management and all record retention requirements. Cross-department checks and

balances ensure continuity across the City when processing federal award payments and reimbursements. Further, Staff have developed subrecipient agreements, general terms and conditions for contracts and procurement documents, and job sequencing documents and process documents to prevent gaps in the event of attrition.

For program implementation, oversight is provided by the CDBG Advisory Committee which is composed of 7 residents appointed by the Mayor, a City Council liaison, and a staff liaison. Of these members, 4 must reside in one of the local Neighborhood Association neighborhoods. This ensures proper representation of the City-populations living in low-moderate income areas. The Advisory Committee meets monthly and reviews the Consolidated Plan, Annual Action Plan, and CAPER. The Committee makes recommendations on these plans, specifically how program funds will be spent or awarded to subrecipients, and submits these recommendations to City Council. The City Council then votes to adopt the Consolidate Plan and Annual Action Plans after a public hearing.

Many policies, procedures, and processes have developed over the last 26 years of implementing the CDBG program in Pocatello. A combination of internal procedures implemented by professional staff as well as the open, public process followed by the Advisory Committee and City Council allow for many checks and balances to ensure a profound institutional structure for the management and administration of the CDBG program.

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

The City's PDS Department works regularly with private housing agencies, particularly developers, through various application and permitting processes. Because the CDBG program is housed in the PDS Department, this allows for open lines of communication between the staff working day to day on private housing development and CDBG staff. CDBG Staff collaborate and work with many agencies throughout Pocatello, as has been noted. This collaboration allows for streamlined information sharing about private and public housing provision in the City. Additionally, the CDBG Staff have been working with the HACP to improve the lease-up of housing choice vouchers by private landlords. There are more HCVs available in the City than units so it will require conversations and work with local private landlords to fully lease these units. This has been an ongoing priority of the City Council as well. The Housing and Homelessness Coalition created a subcommittee to investigate the issue as well.

Finally, the City works closely with NeighborWorks Pocatello to implement various housing projects. NWP provides infill housing development for qualifying applicants. CDBG has been used to acquire and clear lots for these developments and will be used for that in PY22. In PY21, the City was able to assist NWP with its LIHTC application for senior housing development. This development will bring over 50 units online for low income seniors in the community. These types of developments funded through a variety of public and private sources are prime examples of leveraging existing resources and CDBG program funding.

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

As a result of the COVID-19 pandemic and the increasing effects of the affordable housing crisis plaguing the nation, the City worked to address fair housing issues facing renters, homeowners, landlords, and housing providers. In PY21, the Idaho entitlement communities revived the Idaho Fair Housing Forum, a working group of CDBG entitlements, HUD representatives, Intermountain Fair Housing Council representatives, Idaho Legal Aid representatives, and other community members aimed at addressing fair housing in the state and improving impediments to fair housing choice. The forum meets monthly and participates in fair housing training, discusses fair housing issues, and develop best practices to address impediments to fair housing. The City assisted with the training and speaker series in March, facilitating a conversation with Pocatello's HACP Executive Director Sara Van Cleve about potential ordinances and policies that could be adopted to address income discrimination in housing choice. In addition, every April the CDBG Program Staff present to local REALTORS during Fair Housing Month to educate them on fair housing and answer questions. The City also serves as the fair housing point of contact for complaints or issues. In this capacity, Staff are able to assist complainants by directing them to available resources including the Intermountain Fair Housing Council, Idaho Legal Aid, and the HUD Office of Fair Housing and Equal Opportunity, specifically to file a complaint. City staff also attended a Fair Housing training in December of 2021 hosted by the IFHC. Finally, Staff worked with its consultant to develop its PY2022-2026 Consolidated Plan. Through this process, the City conducted an analysis of impediments to fair housing. This included launching a citywide survey that targeted LMI populations. The survey had over 750 responses including several questions asking about impediments to fair housing. Survey results demonstrated common themes in the City regarding landlord discrimination on the basis of race, ethnicity, familial status, sex, and disability. The City will use these results to address these impediments in its PY22 plans and inform Fair Housing activities.

## **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 for those subrecipients. In addition, after 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 monitorings of Subrecipients based on a risk analysis outlined in the Policies and Procedures as well as following HUD guidelines. This process was initiated in PY21 after a brief hiatus due to COVID-19. The City completed a risk assessment of PY21 Subrecipients and as a result conducting on-site monitoring for Saint Vincent de Paul's Social Services program and New Day Products transportation program. In addition, the City completed a desk review for NeighborWorks Pocatello. Monitoring results were reported to Subrecipients and saved in the PY21 records.

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 such as including minority businesses in outreach. 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 MBE/WBE and Section 3 businesses to submit responses to the solicitations. Projects exceeding \$100,000 must adhere to the Section 3 policy and a Section 3 business advantage is given to qualifying bidders. 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 is 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 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. 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. 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 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 2 agencies that serve the target population.

In addition, the Consolidated Plan and Annual Action Plan comment periods are 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. 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 a 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.

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. 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.

## **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 2021 represented year 5 of the five-year Consolidated Plan for Program Years 2017-2021. Program objectives established by the 2017-2021 Consolidated Plan were not changed in PY21 and all projects conducted - Housing, Public Infrastructure, Public Facilities, Public Services, and Planning - aligned with the goals in the plan. Specific activities to carry out these projects were identified during the Annual Action Plan planning process and were identified as meeting plan goals. However, because the Consolidated Plan concludes in PY21, Staff completed a new five-year Consolidated Plan to guide the next five program years. Needs were similar to the 2017-2021 Con Plan, however, an emphasis on Housing and Public Infrastructure dominated the needs. Most funding will be allocated to Housing over the next 5-year plan in an effort to address availability of affordable housing. In addition, Citizen feedback and City Council priorities indicated a need for public infrastructure improvements specifically through the contiguity of sidewalks and ADA complaint ramps to address mobility and accessibility issues throughout the LMA neighborhoods. Finally, the needs assessment identified a continued demand for public service funding. As such, the allowable maximum will be dedicated to public service activities throughout the five-year plan implementation. When determining goals for the projects, staff will look at historical trends for completing projects on time and the quantities or number of beneficiaries to ensure a reasonable number is set. The market, supply chain, construction season, and other outside factors all influence the ability to complete projects, particularly rehabilitation and infrastructure work. This will affect programs and planned outcomes.

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

No

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

## **CR-45 - CDBG 91.520(c)**

**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 2021 represented year 5 of the five-year Consolidated Plan for Program Years 2017-2021. Program objectives established by the 2017-2021 Consolidated Plan were not changed in PY21 and all projects conducted - Housing, Public Infrastructure, Public Facilities, Public Services, and Planning - aligned with the goals in the plan. Specific activities to carry out these projects were identified during the Annual Action Plan planning process and were identified as meeting plan goals. However, because the Consolidated Plan concludes in PY21, Staff completed a new five-year Consolidated Plan to guide the next five program years. Needs were similar to the 2017-2021 Con Plan, however, an emphasis on Housing and Public Infrastructure dominated the needs. Most funding will be allocated to Housing over the next 5-year plan in an effort to address availability of affordable housing. In addition, Citizen feedback and City Council priorities indicated a need for public infrastructure improvements specifically through the contiguity of sidewalks and ADA complaint ramps to address mobility and accessibility issues throughout the LMA neighborhoods. Finally, the needs assessment identified a continued demand for public service funding. As such, the allowable maximum will be dedicated to public service activities throughout the five-year plan implementation. When determining goals for the projects, staff will look at historical trends for completing projects on time and the quantities or number of beneficiaries to ensure a reasonable number is set. The market, supply chain, construction season, and other outside factors all influence the ability to complete projects, particularly rehabilitation and infrastructure work. This will affect programs and planned outcomes.

**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

| <b>Total Labor Hours</b>              | <b>CDBG</b> | <b>HOME</b> | <b>ESG</b> | <b>HOPWA</b> | <b>HTF</b> |
|---------------------------------------|-------------|-------------|------------|--------------|------------|
| Total Number of Activities            | 0           | 0           | 0          | 0            | 0          |
| Total Labor Hours                     | 0           |             |            |              |            |
| Total Section 3 Worker Hours          | 0           |             |            |              |            |
| Total Targeted Section 3 Worker Hours | 0           |             |            |              |            |

**Table 8 – Total Labor Hours**

| <b>Qualitative Efforts - Number of Activities by Program</b>                                                                                                                                            | <b>CDBG</b> | <b>HOME</b> | <b>ESG</b> | <b>HOPWA</b> | <b>HTF</b> |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------|-------------|------------|--------------|------------|
| Outreach efforts to generate job applicants who are Public Housing Targeted Workers                                                                                                                     | 0           |             |            |              |            |
| Outreach efforts to generate job applicants who are Other Funding Targeted Workers.                                                                                                                     | 0           |             |            |              |            |
| Direct, on-the job training (including apprenticeships).                                                                                                                                                | 0           |             |            |              |            |
| Indirect training such as arranging for, contracting for, or paying tuition for, off-site training.                                                                                                     | 0           |             |            |              |            |
| Technical assistance to help Section 3 workers compete for jobs (e.g., resume assistance, coaching).                                                                                                    | 0           |             |            |              |            |
| Outreach efforts to identify and secure bids from Section 3 business concerns.                                                                                                                          | 7           |             |            |              |            |
| Technical assistance to help Section 3 business concerns understand and bid on contracts.                                                                                                               | 0           |             |            |              |            |
| Division of contracts into smaller jobs to facilitate participation by Section 3 business concerns.                                                                                                     | 0           |             |            |              |            |
| Provided or connected residents with assistance in seeking employment including: drafting resumes, preparing for interviews, finding job opportunities, connecting residents to job placement services. | 0           |             |            |              |            |
| Held one or more job fairs.                                                                                                                                                                             | 0           |             |            |              |            |
| Provided or connected residents with supportive services that can provide direct services or referrals.                                                                                                 | 1           |             |            |              |            |
| Provided or connected residents with supportive services that provide one or more of the following: work readiness health screenings, interview clothing, uniforms, test fees, transportation.          | 0           |             |            |              |            |
| Assisted residents with finding child care.                                                                                                                                                             | 0           |             |            |              |            |
| Assisted residents to apply for, or attend community college or a four year educational institution.                                                                                                    | 0           |             |            |              |            |
| Assisted residents to apply for, or attend vocational/technical training.                                                                                                                               | 1           |             |            |              |            |
| Assisted residents to obtain financial literacy training and/or coaching.                                                                                                                               | 0           |             |            |              |            |
| Bonding assistance, guaranties, or other efforts to support viable bids from Section 3 business concerns.                                                                                               | 0           |             |            |              |            |
| Provided or connected residents with training on computer use or online technologies.                                                                                                                   | 0           |             |            |              |            |
| Promoting the use of a business registry designed to create opportunities for disadvantaged and small businesses.                                                                                       | 0           |             |            |              |            |
| Outreach, engagement, or referrals with the state one-stop system, as designed in Section 121(e)(2) of the Workforce Innovation and Opportunity Act.                                                    | 0           |             |            |              |            |

|        |   |  |  |  |  |
|--------|---|--|--|--|--|
| Other. | 1 |  |  |  |  |
|--------|---|--|--|--|--|

**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 in PY21, the City solicited bids for the Family Services Alliance Parking lot, Saint Vincent de Paul parking lot and Bannock Youth Foundation roof, all of which 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 4 of these projects in PY21 with multiple bid solicitations. As a result Outreach efforts to identify and secure bids from Section 3 business concerns totaled 7 activities.

In addition, Staff will discuss the Section 3 preference with contractors with whom the City awards bids 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 transportation services 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, transportation. These are parts of service projects and not standalone activities so they are not tallied above.

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, sponsors through supply provision, and in the event planning meetings. As a result, this activity was counted for providing direct services or referrals and the vocational/technical training.