

2018 Draft Consolidated Annual Performance and Evaluation Report

City of Plymouth

September 3, 2019

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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 Plymouth is a recipient of Community Development Block Grant (CDBG) entitlement funds through the U.S. Department of Housing and Urban Development (HUD). These funds are allocated and expended for activities benefitting City of Plymouth residents. HUD requires a summary submission of the annual performance for the programs. The following is an overview of accomplishments for the most current reporting period of July 1, 2018 - June 30, 2019. This is the fourth reporting period in the Consolidated Plan.

The City of Plymouth is one of three CDBG entitlement jurisdictions among 43 suburban communities within Hennepin County, and remains a part of the Hennepin County Consortium for the purposes of the Five-Year Consolidated Plan.

The City of Plymouth has used its allocations according to the directives given in the 2018 Action Plan. Of the total estimated 2018 CDBG budget (2018 allocation of \$264,529 and \$50,000 in program income), \$225,750 was used for affordable housing projects, \$45,750 was used for public service activities; \$3,500 was used for fair housing activities, and \$21,000 was allocated for the administration of the CDBG Program. The City of Plymouth received \$160,014 in program income during the 2018 year that was reallocated back into the program. There was an estimated \$148,516 in funding available via carryover from the 2017 program year.

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
Direct homebuyer assistance	Affordable Housing	CDBG: \$	Direct Financial Assistance to Homebuyers	Households Assisted	15	9	60.00%	3	2	66.67%
Homelessness prevention	Non-Housing Community Development	CDBG: \$	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	25	39	156.00%	10	10	100.00%
Homelessness prevention	Non-Housing Community Development	CDBG: \$	Public service activities for Low/Moderate Income Housing Benefit	Households Assisted	0	5		3	5	166.67%
Homeowner education	Non-Housing Community Development	CDBG: \$	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	300	161	53.67%	53	11	20.75%
Homeowner rehabilitation assistance	Affordable Housing	CDBG: \$	Homeowner Housing Rehabilitated	Household Housing Unit	40	31	77.50%	9	4	44.44%
Rental housing rehabilitation	Affordable Housing Non-Homeless Special Needs	CDBG: \$	Rental units rehabilitated	Household Housing Unit	8	14	175.00%	4	4	100.00%

Rental housing rehabilitation	Affordable Housing Non-Homeless Special Needs	CDBG: \$	Homeowner Housing Rehabilitated	Household Housing Unit	0	4		0	4	
Senior services	Non-Housing Community Development	CDBG: \$	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	225	238	105.78%	65	62	95.38%
Tenant counseling	Non-Housing Community Development	CDBG: \$	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	1250	1190	95.20%	500	502	100.40%
Youth services	Non-Housing Community Development	CDBG: \$	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	500	314	62.80%	63	89	141.27%

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

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

The City of Plymouth has three high priority needs that are addressed within the Consolidated Plan: 1. Preserve and create Single Family Homeownership; 2. Preserve and create Rental Housing; 3. Education, Outreach, and Services. Of these three high priority needs, the City of Plymouth has worked to address these goals in a variety of ways including meeting goals of rehabilitating single-family owner-occupied properties, as well as assisting first time homebuyers in a competitive and rising housing market. The City of Plymouth also met the fourth year goal of preserving multifamily rental opportunities by working closely with sub-grantees. Two of the six sub-grantees working in Education, Outreach, and Services met or exceeded their annual goals. 10 Plymouth families received homeless prevention assistance, and 5 Plymouth families received direct assistance in the form of rental assistance while they pursue an educational degree. In addition, the owner-occupied Rehabilitation Loan Program assisted 4 homeowners with needed home repairs. The City also met its goal of assisting with the rehabilitation of affordable rental homes for special-needs individuals through the rehabilitation of 4 rental buildings.

In addition to housing rehabilitation efforts throughout the City, the First Time Homebuyer Program helped 2 households purchase their first home in the City of Plymouth. The program continues to receive interest from potential homebuyers and mortgage lenders.

Staff worked with lower-performing agencies throughout the year to identify issues that kept them from accomplishing their annual goals, as well as potential solutions to better serve residents of Plymouth. Staff will continue to assist sub-grantees with achieving their indicated goals through increased communication, annual monitorings, and research of additional programs applicable under federal guidelines that serve a need in the City.

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	177
Black or African American	100
Asian	9
American Indian or American Native	3
Native Hawaiian or Other Pacific Islander	0
Total	289
Hispanic	14
Not Hispanic	330

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

Narrative

According to census estimates provided by the U.S. Census Bureau, the population estimate for Plymouth as of July 1, 2018 was 79,450. 82.6% of Plymouth's population identified as white alone, 5.2% identified as black or African-American, and 8.7% identified as Asian. The above assisted numbers are generally representative of the racial and ethnic population for the City of Plymouth.

The City of Plymouth actually served 344 households during the 2018 Program Year, but due to no option for inclusion of households identifying as multi-racial or other, these 55 additional households were not able to be included in the total for Table 2.

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	651,607	268,547
LIHTC	public - federal	0	
Section 8	public - federal	0	
Tax Exempt Bond Proceeds	public - local	0	
Tax Increment Financing	public - local	0	
Other	private	0	
Other	public - local	0	
Other	public - state	0	

Table 3 - Resources Made Available

Narrative

The City of Plymouth uses CDBG funding in addition to funding provided through the HRA Affordable Housing Account, Local HRA Tax Levies, and the City of Plymouth Economic Development Fund. CDBG is just one resource available for the City's continual upkeep and improvement of housing throughout the City. The HRA Tax Levy was utilized to assist in the subsidizing of rental housing for senior citizen households through the City's senior housing portfolio. The HRA also provided funding to assist residents with energy audits and potential home improvements along with architectural design consultations for older housing stock. Finally, the Plymouth Economic Development Fund is available to provide funding for activities that help to create jobs, increase business activities, and increase the tax base within the City.

Identify the geographic distribution and location of investments

Target Area	Planned Percentage of Allocation	Actual Percentage of Allocation	Narrative Description

Table 4 – Identify the geographic distribution and location of investments

Narrative

The City of Plymouth programs are available to low- and moderate-income households throughout the City and are not otherwise geographically targeted. All qualifying residents within the City of Plymouth are able to receive assistance through the programs.

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 of Plymouth does not have any specific matching requirements associated with the CDBG program. The City of Plymouth used funding from the HRA tax levy to assist with ongoing maintenance and upkeep of senior housing throughout the City. The City also has an economic development fund which has been used previously to provide loans that help stimulate business activities which create job growth and increase the local tax base. Additionally, the City has an HRA funded Rehabilitation Program which assists homeowners who may not be income-eligible for the CDBG-funded Rehabilitation Program.

The City works with the Center for Energy and the Environment (CEE) to provide low-cost home energy assessments that can aid in bringing down energy costs for homeowners. Due to an aging housing stock in Plymouth, the HRA also funds an Architectural Design Program which provides architectural guidance to homeowners looking to make additions or remodel their current homes.

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

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	9	4
Number of households supported through Acquisition of Existing Units	3	2
Total	12	6

Table 6 – Number of Households Supported

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

The City of Plymouth is part of the larger Hennepin County HOME Consortium which focuses on affordable housing goals for Hennepin County. The City of Plymouth used all 2018 program year funds to assist households at or below 80% of area median income (AMI), as defined by HUD. Plymouth provides assistance to residents through both a homebuyer assistance program and rehabilitation assistance for current homeowners. Due to an aging housing stock, the Rehabilitation Program has been generally successful in meeting goals provided in the Action Plan. A tight housing market has made it more difficult for potential homebuyers to find properties available for purchase within the City of Plymouth.

Discuss how these outcomes will impact future annual action plans.

The City of Plymouth will continue to analyze economic trends that contribute to the relative successes of the First Time Homebuyer and Home Rehabilitation programs. At the same time, the City will continue to target outreach towards households that are in need of assistance and meet income requirements, as well as local and regional organizations that work with these households, in order to spread awareness of funding available. Overall, the City will monitor the programs and adjust future annual action plans accordingly.

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	111	0
Low-income	158	0
Moderate-income	75	0
Total	344	0

Table 7 – Number of Households Served

Narrative Information

The median household income for a family of 4 in the City of Plymouth during the 2018 program year was \$94,300. The numbers in the table above are representative of populations that are part of Plymouth. The number of households assisted in the extremely low-income and low-income categories show people most in need of receiving assistance have increasingly had access to resources. The City CDBG program assists all residents with extremely-low, low-, and moderate-incomes - at or below 80% AMI.

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 of Plymouth is part of the Hennepin County Consortium and when presented with someone needing access to services to reduce or end homelessness would refer them to our network of social service agencies as well as Hennepin County to receive services. The accomplishments stated within this objective are those of Hennepin County.

St. Stephens Human Services (SSHS) operates a five-person street outreach team in Minneapolis that conducts initial engagement, harm minimization, and connection to services for people who are unsheltered. It conducts assessments and refers people directly to housing through the Continuum of Care's (CoC) Coordinated Entry System (CES). Hennepin County's Healthcare for the Homeless staff regularly accompany the outreach team to provide healthcare directly to those unsheltered or living outdoors. SSHS also has one additional outreach worker permanently based in the downtown library where large numbers of people experiencing homelessness convene during the daytime.

In the fall of 2017, the American Indian Community Development Corporation (AICDC) launched a new two-person outreach program targeted towards Native Americans with Substance Use Disorders who are unsheltered with linkages to a new low-barrier housing program for the same target population.

Youth-specific outreach workers are organized through a consortium of youth-serving agencies and focus on identification and quick connection to services for youth who are unsheltered, particularly through the Youth Opportunity Center (YOC). The YOC hosts 20-30 different agencies and services in a single downtown location. Similarly, Catholic Charities operates the Adult Opportunity Center, a drop-in center offering an array of services to meet the needs of people experiencing homelessness, including assessment for CES, employment training and again, healthcare services.

Hennepin County operates a single point of entry into the shelter system for those who would otherwise go unsheltered - the Adult Shelter Connect (ASC). ASC staff operate out of a well-publicized fixed location where they conduct the initial ESG assessment for all those seeking shelter, provide orientation to the shelter system, and make bed reservations at any adult shelters with capacity. The system maximizes utility of every bed in the system, thereby avoiding unsheltered nights wherever possible. An after-hours telephone service ensures all unclaimed reservations can be re-allocated to those still in need of shelter.

Singles and families in shelter are also assessed with the VI-SPDAT and placed on the priority list for homeless-specific rapid rehousing, transitional housing, or permanent supportive housing. People

fleeing domestic violence are assessed through the county's "front door" and placed on the priority list.

Addressing the emergency shelter and transitional housing needs of homeless persons

The City of Plymouth works with the network of services that Hennepin County has available through the following:

Hennepin County has a "shelter all" family policy which guarantees shelter beds for any family experiencing homelessness. The shelter capacity for families expands as need demands. Families are assessed for Coordinated Entry within one week of shelter entry and referred to Transitional Housing, Rapid Rehousing, or Permanent Supportive Housing as appropriate.

For singles, Hennepin County's Adult Shelter Connect provides a central intake and referral to shelter and the ability of shelter guests to "reserve" a bed each night, ensuring that they have a safe place to sleep. Youth can use the ASC to access non-age specific shelter, or can enter youth-designated shelters directly. This system works across five different providers and has allowed for greater specialization of shelter usage, particularly in transferring those guests in need of greater supports to shelters that offer more intensive case management.

Hennepin CoC has used the data gathered from the central intake to right-size the singles shelter beds inventory in terms of both number and types of beds, in order to best meet the needs of single adults experiencing homelessness in Hennepin County. Since 2017, a 60-bed winter shelter was converted to a year-round shelter to increase capacity during the summer months, particularly for women and couples as the shelter specializes in serving these groups. In addition, funding for a 180 bed 24-hour shelter was converted in order to reduce barriers to entry, particularly in relation to financial cost to guests, increased utilization, and allowing more vulnerable individuals to benefit from a 24-hour shelter.

The CoC tracks length of stay in shelter and identifies people to be assessed with the VI-SPDAT through a Homeless Management Information System (HMIS) data report. Shelter workers, or a contracted assessor, then complete assessments on single adults and place them on the priority list through CES.

In addition, the City of Plymouth continues to work with a network of social service providers such as Interfaith Outreach and PRISM to assist persons experiencing homelessness or needing 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 of Plymouth works with PRISM and Interfaith Outreach as well as other social service agencies to address homeless issues. PRISM offers help with temporary housing assistance and payments in order to prevent homelessness for a small window of time. With any situation, when presented to the City of Plymouth, the issue would be addressed in any means possible as well as using the assistance of Hennepin County. As part of the Hennepin County Consortium, the City of Plymouth has access to the following resources through Hennepin County.

To the extent possible, people who are not literally homeless are first directed to "non-homeless" resources to assist in housing stability. Hennepin County offers emergency assistance for rent or utility bill arrears to keep people in their current housing. The county uses state dollars from Family Homeless Prevention and Assistance Program (FHPAP) for people needing additional financial assistance, supportive services, and case management. FHPAP resources are targeted to households with the greatest risk of homelessness using a targeting tool based on local and national resources.

Hennepin County's Housing Stability office works with county staff to identify and develop mainstream-funded housing opportunities for people being discharged from institutions. The County operates the "Hennepin Housing Key" which is an online resource of openings in specialized housing for people with disabilities or those experiencing homelessness. The Key, when fully implemented, will include up to 14,000 housing units with current availability. County and community case managers are using the Key to find housing for people exiting treatment or care or for County clients who need to move.

Hennepin County is currently partnered with local foundations to increase and improve efforts to prevent homelessness. This has included an eviction prevention pilot, a shelter diversion program for families who could avoid a shelter stay by returning to their housing situation for a short period of time if they have assistance to find a more stable home, and flexible homeless prevention funding. The next phase is a community-wide visioning process to develop centralized access for coordinated homeless prevention resources.

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

For all populations, the focus is on making homelessness rare, brief, and non-recurring. Hennepin CoC uses the VI-F-SPDAT to assess people's vulnerability and need for supports to end a person's homelessness. Families (including young families) experiencing homelessness are assessed via the VI-F-SPDAT within a week of shelter entry. Single adults are assessed via the VI-SPDA, and youth with the TAY-SPDAT, with the goal of assessing within 14 days of shelter entry.

All households are offered Permanent Supportive Housing, Rapid Rehousing, or Transitional Housing

services, or identified as able to self-resolve, based on their vulnerability and program vacancies. The focus in shelter is on making the experience as brief as possible, but with sufficient supports in place upon housing to make a recurrence of homelessness rare. The Rapid Rehousing program has flexible rental and social service supports so that support may continue up to two years, as needed by the household. Although Hennepin CoC was one of the original developers of Rapid Rehousing, the CoC continues to expedite exits to and retention of permanent housing, including methods such as Critical Time Intervention, shared housing, and progressive engagement, including using rapid rehousing as a bridge to permanent supportive housing.

A by-name list has been established for anyone who has stayed longer than a year in shelter and therefore may be experiencing chronic homelessness ('The Chronic Index'). This list is used to target case management from the PATH-funded Hennepin County Homeless Access team and for bi-weekly case conferencing. Since adopting this approach in July 2017, 288 individuals experiencing chronic homelessness have been housed, with about a 6% return to shelter rate.

In 2018 Hennepin County launched two new programs to expedite exit from shelter. One program helps families develop housing plans, ameliorate housing barriers such as open warrants and criminal records, and collect documentation needed for housing applications. Another program offers light-touch assistance to singles needing only minimal support to access housing opportunities. Finally, the Hennepin CoC uses state funds to support an intensive homeless prevention service for families that have been in shelter more than two times in the last two years. This program effectively reduces returns to shelter for these families. The CoC also targets all homeless prevention resources to households with past periods of homelessness. The number of families experiencing homelessness, as measured in the PIT, has dropped year-on-year since 2014, achieving a cumulative reduction of more than 40 percent.

The City of Plymouth has access to these services and refers anyone needing help to the above services and to the extent possible, follows up to ensure the proper assistance was provided.

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

Actions taken to address the needs of public housing

The City of Plymouth has no federal public housing within its jurisdiction. The Plymouth HRA does administer approximately 310 Housing Choice Vouchers (HCV). HCV's provide federal rent subsidies for low-income individuals and families in privately owned, existing market-rate housing. The funding from HUD is paid directly to the owner of the property.

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

The City of Plymouth does not have any public housing within its jurisdiction, however, the Plymouth HRA has two resident advisory boards - one for its HCV program and the other for the locally financed 99-unit subsidized senior housing development. The HCV Resident Advisory committee advises the HRA on policy development and review. The senior development - Plymouth Towne Square - has a residents' council which advises the HRA on management and resident services.

Actions taken to provide assistance to troubled PHAs

The Plymouth HRA administers the HCV Program and has been given the designation of a High Performing PHA.

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 does not face any significant negative effects due to public policies within the community. There are, however, state and/or federal regulations and taxing policies that may have a negative impact on the provision of affordable housing. The City collaborates with other public entities whenever possible to identify and mitigate policies and other barriers to affordable housing. Partnering with developers and developments that encourage affordable housing, the City will assist in funding with Tax Increment Financing (TIF) and work with developments to mitigate costs and potential land issues that may arise.

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

The City of Plymouth continues to look for ways to assist with affordable housing. The City of Plymouth provided financial assistance for rehabilitating owner-occupied units for low- to moderate-income families. The City assisted with meeting affordable housing needs by providing downpayment and closing cost assistance, combined with homebuyer counseling and education for low- to moderate-income families.

Additionally, the City of Plymouth began a locally funded Rehabilitation Loan program to aid homeowners unable to qualify for CDBG funding with the rehabilitation of existing housing stock. The City assisted in funding the Home Energy Squad program, allowing homeowners within the jurisdiction to perform an energy audit for a lower cost than offered by local utility companies in order to discover energy conservation and efficiency options. The program provides homeowners with energy efficient products such as CFL lightbulbs and programmable thermostats.

Finally, in 2017 the City approved the preliminary plat and site plan for the Cranberry Ridge development, which will provide 45 affordable units (at or below 60% AMI) and will be made available to Housing Choice Voucher clients. Of the 45 units, 10 will be set aside for clients at or below 30% AMI. The project is currently finalizing its financing structure before breaking ground. Another affordable development is in its preliminary stages, and has proposed another 58 units of affordable housing.

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

As part of the City's Rental Housing Licensing Program, all rental properties in the City are inspected at least every three (3) years. The inspector has satisfied HUD's Risk Assessment Course and is a Certified Risk Assessor. All participants in the City's Housing Choice Voucher program that reside in housing built before 1978 receive copies of the EPA brochure "Protect Your Family From Lead in Your Home". All

program participants in the City's Rehabilitation and First Time Homebuyer programs are also given the EPA brochure.

The Plymouth HRA has incorporated procedures in the guidelines for all federally-funded programs in order to meet the requirements of federal Lead-Based Paint (LBP) regulations. Discussion of the LBP requirements is discussed at any initial meetings with HRA staff and all files require a Certification of Receipt of LBP signed by the applicant. All homes built before 1978 with deteriorated paint surfaces that may require lead hazard reduction work receive lead testing. Plymouth HRA contracts with a certified Risk Assessor to perform the needed tests to identify lead hazard risks. Clearance reports were issued to all homeowners who had work done that disturbed painted surfaces, and a copy is kept by the HRA in the homeowner's file.

Since 2004, Hennepin County has taken a comprehensive approach to preventing childhood lead poisoning including community outreach and education, in-home lead education visits, lead risk assessments, lead hazard reduction, and contractor training. Hennepin County has completed ten HUD Office of Lead Hazard Control and Healthy Homes grants, totaling \$33.2 million for the period from October 2003 to December 2018. Hennepin County is currently administering a 2017 HUD Office of Lead Hazard Control and Healthy Homes grant in the amount of \$3.4 million to continue the program through 2021. Since 2003, the lead grant programs have completed over 4,700 lead hazard reduction projects. Hennepin County also received a grant award from the Centers for Disease Control in the last program year. This grant award will allow the County to increase outreach and education, especially to the most at-risk populations and geographies, through mini-grants to community partners who already serve and are trusted in target populations and geographies. These grants demonstrate Hennepin County's continued efforts to provide affordable and safe housing to its residents while working toward the goal of eliminating childhood lead poisoning. The funds may be used throughout Hennepin County.

During the 2018 program year, HUD funded lead grant programs completed 210 in-home lead education visits, 94 lead risk assessment evaluations and 92 lead hazard reductions. Hennepin County also funded 16 lead-safe work practices courses that trained 79 individuals. A typical lead reduction project includes window replacement, paint stabilization and lead dust cleaning. During the 2018 program year, HUD lead-based paint grant funds totaling \$546,103 were matched by \$241,520 of local funds to complete the lead hazard reduction projects.

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

Whenever possible, the City of Plymouth works diligently through its programs to identify and assist individuals and families at or below the poverty level. Collaboration with Public Safety and the City of Plymouth Housing Inspector help identify homeowners and renters who may be in need of additional services. Through an established network of relationships with social service agencies, the City refers clients to appropriate areas and assists with CDBG resources when applicable. There are also programs offered through the City of Plymouth, the Plymouth HRA, and local non-profits that assist individuals and families experiencing poverty. PRISM and Interfaith Outreach help assist with homelessness in the

City of Plymouth. HOME Line assists tenants with rental disputes. TreeHOUSE works with youth of the community, and Senior Community Services assists low-income senior homeowners with home maintenance. As a member of the Hennepin County Consortium, the City of Plymouth works closely with case managers from Hennepin County to alert the County whenever an individual in the jurisdiction may need additional assistance.

Finally, as aforementioned the Cranberry Ridge development will provide 45 units of affordable housing at or below 60% AMI. 10 of those units will be set aside for families at or below 30% AMI - extremely low income levels.

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

The City of Plymouth continues to coordinate with other institutions in the delivery of housing and community development programs. Whenever possible, the Plymouth HRA leverages its CDBG funds with other state and local programs. The City coordinates with Hennepin County to deliver Healthy Homes grant funding to help with lead-based paint hazard reduction in conjunction with the CDBG Rehabilitation Loan Program. Minnesota Housing is also a resource that is recommended to potential homebuyers and current homeowners within the City.

The City of Plymouth also offers two programs to all homeowners for the purpose of addressing specific needs in aging homes. The first program is the Home Energy Squad program, which is a collaboration between the Center for Energy and the Environment (CEE) and the Plymouth HRA that provides funding to qualified homeowners for the purpose of home energy audits. The Plymouth HRA also funds the Architectural Design Program which assists with the costs of having a qualified architect give remodeling advice to homeowners looking to make improvements to their aging (30+ years old) homes.

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

The City of Plymouth has developed and maintained a strong collaborative relationship with other social service agencies and housing providers. Specifically, the City works with People Responding in Social Ministry (PRISM), Metropolitan Interfaith Council on Affordable Housing (MICAH), Habitat for Humanity, and Interfaith Outreach.

All First Time Homebuyer loan recipients are required to attend HUD-approved homebuyer workshops presented by Community Action Partnership of Hennepin County (CAP-HC) or other Home Stretch accredited workshops. CAP-HC specifically works to assist lower-income households with comprehensive financial counseling and homeownership training. Completing these required programs provides first time homebuyers with information and education necessary for purchasing a home.

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

The City of Plymouth is a member of the Fair Housing Implementation Council (FHIC) established in 2002 to coordinate efforts of its members to comply with obligations that affirmatively further fair housing throughout the metro housing market area. During the 2018 program year, the FHIC continued to address recommendations brought forth in the Addendum to the Regional Analysis of Impediment to Fair Housing (AI). Community engagement was completed through the RFP awarded in the 2016 program year. The FHIC also released and began a new community engagement RFQ in the 2017 program year to assist in addressing underrepresented residents within Plymouth and assess the needs of these groups. Work continued on this RFQ throughout the 2018 program year.

The FHIC initiates activities that are designed to stop discrimination and promote integration. Such activities are a response to the 2001 Regional Analysis of Impediments to Fair Housing (AI), funded by participating metropolitan jurisdictions. The City of Plymouth has been an active member of this council designating time and resources to assure that there is fair housing for all people, not only within the jurisdiction, but also the broader metropolitan area.

Per the recommendations of the AI, Plymouth has worked as part of the Hennepin County Consortium. The Consortium provided funding to the Center for Urban and Regional Affairs (CURA) in order to study displacement of lower income and people of color in the suburbs specifically. Any additional resources will go to Fair Housing training for staff and potential decision makers for entitlement communities, as well as to work on Fair Housing trainings in a variety of languages.

The City of Plymouth specifically has worked to address items in the AI recommendations that targeted Plymouth and other entitlements. Plymouth continues to be an active member of the FHIC. This includes distribution of recent RFQ to suburban-focused agencies in order to advance community engagement in the suburbs. Plymouth annually monitors our sub-grantees for compliance with Fair Housing guidelines as well as requiring quarterly reports on demographics of any clients of the sub-grantee's programs. Plymouth provides vouchers for renters through our HRA and because of this, the Plymouth HRA follows all guidelines of Fair Housing required by Section 8 and HCV. The City encourages landlords to accept vouchers whenever possible to assist with more affordable housing options. The City also adopted a Fair Housing Policy in 2018.

Staff continually monitors new state legislation to ensure programs are in compliance with all statutes. The Plymouth HRA continues to provide funding for rehabilitation and acquisition of existing affordable housing to assist lower-income households with maintaining and purchasing homes within Plymouth. Finally, the Community Development department consists of a Housing Inspector who works as an intermediary between public safety, non-profit and assistance agencies, tenants and citizens.

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

Contracts are executed with all organizations implementing activities identified in the Consolidated Plan. The Plymouth HRA is responsible for contract administration and compliance, and has experience monitoring federal programs through CDBG grants in previous years. Monitoring is an ongoing process, incorporating six areas of activity:

Funding Agreement - For each program or project funded through consolidated plan resources, the applicant will be required to enter into a funding agreement covering at least the following items:

- Schedule for project implementation.
- Financial management of program funds and required matching funds.
- Compliance with related federal regulations.
- Appropriate long-term affordability/access requirements.
- Schedules for project compliance documentation.
- Repayment requirements for noncompliance.

The funding agreement provides a basis for assessing the development and tracking implementation of funded activities. Provisions of the agreement serve as a benchmark that is reviewed for compliance. Appropriate remedial actions are taken and evaluated in a timely manner. Compliance with the terms of the agreement is required prior to approving any request for funding.

On-Site Visitation - Within each program year, Plymouth HRA staff consults with representatives from each community organization receiving a CDBG funding allocation. This visit includes an in-depth review of project procedures and other regulations and reporting requirements, including those pertaining to HUD. Periodically thereafter, staff may schedule an on-site monitoring to review program operation and ensure file compliance. The frequency and depth of those visits depends upon the perceived risk involved with each project.

Document Review - The documents submitted with reimbursement requests are reviewed for completeness and accuracy. When a problem is discovered, HRA staff discusses the issue(s) with project staff to correct the situation and ensure the problem is understood. Reimbursement does not occur until all requirements are met. If subsequent problems are encountered, the project receives a "high-risk" status, and more frequent on-site monitoring is required.

Performance Report - The completion of the Consolidated Annual Performance Evaluation Report (CAPER) is used to ensure program/project completion. If a significant discrepancy between goals and

performance is found, additional consultation occurs. A lack of progress in meeting indicated goals may harm the applicant's chances for future funding if they are unable to comply with regulations.

Timeliness - Timeliness is a requirement of the monitoring process. All applications require a schedule for the expenditure of funds. If a project is found to be falling behind on expenditures, they are contacted regarding the problem to develop an adjusted timeline.

Evaluation - Continued evaluation of the monitoring process for the City of Plymouth is performed to ensure project/program compliance.

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 public comment period for this report is included with the public hearing held by the Hennepin County Consortium. This report was submitted to Hennepin County prior to the comment period for the Consortium CAPER. No public comments were received concerning the Plymouth portion of the CAPER. In addition, the City of Plymouth held a public hearing on February 21, 2019 to receive comments on the utilization of CDBG funding.

The following reports are available to the public and have been previously submitted to HUD at this point:

- 2015-2019 Hennepin County Consortium Consolidated Plan
- 2019 City of Plymouth Annual Action Plan
- Regional Analysis of Impediments to Fair Housing, February 2015
- Revised Regional Analysis of Impediments to Fair Housing, May 2017

CR-45 - CDBG 91.520(c)

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

The City of Plymouth has used the resources made available to assist homeowners in a variety of ways throughout the program year. There would be no changes to the programs offered other than to continually monitor and stay in close contact with sub-grantees to ensure all stated Action Plan goals are met.

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

No

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

