



2020 Consolidated Annual Performance and Evaluation Report (CAPER)

DRAFT

City of St. Cloud
1300 9th Street
St. Cloud, FL 34769

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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 St. Cloud is a new entitlement city and PY 2020 is the second program year of the City's first 5-Year 2019-2023 Consolidated Plan. In FY 2020, the U.S. Department of Housing and Urban Development (HUD) allocated to the City \$338,056 in CDBG funds. To assist the City fund activities that helped to prevent, prepare for, and respond to COVID-19, CDBG-CV CARES Act funds of \$519,782 was also allocated to the City. These funds help the City to accomplish its objectives that include, but are not limited to affirmatively furthering fair housing, affordable housing development and preservation, public facilities and infrastructure improvements, economic development opportunities and vital public services that improve the quality of life for low-to moderate-income (LMI) households and special needs groups. Each program year will have an Annual Action Plan (AAP) and a Consolidated Annual Performance and Evaluation Report (CAPER) to track the progress of the City's activities towards its goals in meeting the needs of the community for that year.

In PY 2020, the City of St. Cloud continued to work on setting up its CDBG program and identify subrecipients for program activities. The City is working with Habitat for Humanity, and will be starting affordable housing development projects in the upcoming program year. The City was able to accomplish some public services and economic development goals and these are highlighted below:

Public Services: The City funded the Summer Camp Program which helped with enrichment activities that assisted 204 LMI persons. Financial assistance was provided for LMI youth to attend enrichment programs.

Affordable Housing: As previously mentioned, the City is currently working with Habitat for Humanity with affordable housing development projects. Activity #15 Owner Occupied Housing Rehab Program is still open and the City anticipates this program will report accomplishments in the upcoming program year. The City also has a goal to assist LMI homebuyers with direct financial assistance and housing construction, however the City is still reviewing these activities and are they are still in the process of starting.

CARES Act

Economic Development: With CDBG-CV funds, the City helped assist small businesses affected by the pandemic with the CDBG-CV Small Business Rental Assistance Grant program. There were 13 LMI persons that were able to retain jobs and 12 small businesses assisted. The City also has a goal to assist 10 businesses with the CDBG-CV Sidewalk Café Business Assistance Program to help eligible business owners furnish approved

sidewalk café areas. This activity is to help businesses operate during the pandemic as well as prevent the spread of COVID-19. This activity was recently started and accomplishments will be reported in upcoming program years.

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	Indicator	Unit of Measure	Expected – Strategic Plan	Actual – Strategic Plan	Percent Complete	Expected – Program Year	Actual – Program Year	Percent Complete
AM-1 Overall Coordination	Non-Housing Community Development	CDBG CDBG-CV	Other	Other	5	2	40.00%	1	1	100.00%
CD-1 Community Facilities	Non-Housing Community Development	CDBG CDBG-CV	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	Persons Assisted	200	0	0.00%			
CD-1 Community Facilities	Non-Housing Community Development	CDBG CDBG-CV	Other	Other	0	0				
CD-2 Infrastructure	Non-Housing Community Development	CDBG	Other	Other	2	0	0.00%			
CD-3 Public Services	Non-Housing Community Development	CDBG CDBG-CV	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	350	204	58.29%	300	204	68.00%
CD-4 Public Safety	Non-Housing Community Development	CDBG	Other	Other	0	0				
CD-5 Clearance/ Demolition	Non-Housing Community Development	CDBG	Buildings Demolished	Buildings	0	0				

CD-6 Transportation Development	Non-Housing Community Development	CDBG	Other	Other	0	0				
ED-1 Employment	Non-Housing Community Development	CDBG CDBG-CV	Jobs created/retained	Jobs	30	13	43.33%	0	13	100.00%
ED-1 Employment	Non-Housing Community Development	CDBG CDBG-CV	Businesses assisted	Businesses Assisted	0	12		0	12	100.00%
ED-2 Development	Non-Housing Community Development	CDBG	Businesses assisted	Businesses Assisted	0	0				
ED-3 Redevelopment	Non-Housing Community Development	CDBG	Businesses assisted	Businesses Assisted	0	0				
ED-3 Redevelopment	Non-Housing Community Development	CDBG	Other	Other	0	0				
ED-4 Access to Transportation	Non-Housing Community Development	CDBG	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	0	0				
ED-4 Access to Transportation	Non-Housing Community Development	CDBG	Other	Other	0	0				
HO-1 Housing	Homeless	CDBG	Homeless Person Overnight Shelter	Persons Assisted	0	0				
HO-1 Housing	Homeless	CDBG	Overnight/Emergency Shelter/Transitional Housing Beds added	Beds	0	0				

HO-1 Housing	Homeless	CDBG	Housing for Homeless added	Household Housing Unit	0	0				
HO-1 Housing	Homeless	CDBG	Other	Other	0	0				
HO-2 Operation/ Support	Homeless	CDBG	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	0	0				
HO-2 Operation/ Support	Homeless	CDBG	Tenant-based rental assistance / Rapid Rehousing	Households Assisted	0	0				
HO-2 Operation/ Support	Homeless	CDBG	Homeless Person Overnight Shelter	Persons Assisted	0	0				
HO-2 Operation/ Support	Homeless	CDBG	Overnight/Emergency Shelter/Transitional Housing Beds added	Beds	0	0				
HO-2 Operation/ Support	Homeless	CDBG	Homelessness Prevention	Persons Assisted	0	0				
HO-3 Prevention and Re-Housing	Homeless	CDBG	Tenant-based rental assistance / Rapid Rehousing	Households Assisted	0	0				
HO-3 Prevention and Re-Housing	Homeless	CDBG	Homelessness Prevention	Persons Assisted	0	0				
HS-1 Homeownership	Affordable Housing	CDBG	Direct Financial Assistance to Homebuyers	Households Assisted	25	0	0.00%	5	0	0.00%
HS-2 Rental Housing	Affordable Housing	CDBG	Public service activities for Low/Moderate Income Housing Benefit	Households Assisted	0	0				
HS-2 Rental Housing	Affordable Housing	CDBG	Tenant-based rental assistance / Rapid Rehousing	Households Assisted	0	0				

HS-3 Housing Construction	Affordable Housing	CDBG	Rental units constructed	Household Housing Unit	0	0				
HS-3 Housing Construction	Affordable Housing	CDBG	Homeowner Housing Added	Household Housing Unit	4	0	0.00%	1	0	0.00%
HS-4 Housing Rehabilitation	Affordable Housing	CDBG	Rental units rehabilitated	Household Housing Unit	20	0	0.00%			
HS-4 Housing Rehabilitation	Affordable Housing	CDBG	Homeowner Housing Rehabilitated	Household Housing Unit	45	0	0.00%	13	0	0.00%
HS-5 Fair Housing	Affordable Housing	CDBG	Other	Other	5	0	0.00%			
SN-1 Housing	Non-Homeless Special Needs	CDBG	Rental units constructed	Household Housing Unit	0	0				
SN-1 Housing	Non-Homeless Special Needs	CDBG	Rental units rehabilitated	Household Housing Unit	0	0				
SN-1 Housing	Non-Homeless Special Needs	CDBG	Homeowner Housing Added	Household Housing Unit	0	0				
SN-1 Housing	Non-Homeless Special Needs	CDBG	Homeowner Housing Rehabilitated	Household Housing Unit	0	0				
SN-1 Housing	Non-Homeless Special Needs	CDBG	Housing for People with HIV/AIDS added	Household Housing Unit	0	0				
SN-1 Housing	Non-Homeless Special Needs	CDBG	HIV/AIDS Housing Operations	Household Housing Unit	0	0				
SN-2 Social Services	Non-Homeless Special Needs	CDBG	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	Persons Assisted	0	0				
SN-2 Social Services	Non-Homeless Special Needs	CDBG	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	0	0				

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 St. Cloud has identified affordable housing development and preservation, public improvements, economic development and public services to help assist low- to moderate-income households as its highest priority needs in its 2019-2023 Consolidated Plan. In the second program year of the planning period, the City was able to start some activities to address these needs. The following areas below show how funds were expended in PY 2020. The City continues to work on additional activities that were identified in its annual plans, and these funds will be spent as quickly as possible to meet the needs of City residents.

Public Services (Summer Camp Program): \$98,570

Administration: \$131,426

CARES Act Funds

CDBG-CV Public Services (Summer Camp Program): \$28,531

CDBG-CV Small Business Rental Assistance Grant program: \$149,032

CDBG-CV Administration: \$50,000

PY 2020 Goals and Accomplishments Comparison

AM-1 Overall Coordination: The City of St. Cloud Community Development Department administered the CDBG program.

CD-3 Public Services: The City had a goal to assist 300 LMI person with public services and was able to assist 204 LMI persons. This activity was associated with the Summer Camp Program that provided enrichment to LMI youth. Financial assistance was provided for LMI youth to attend enrichment programs.

HS-1 Homeownership, HS-3 Housing Construction & HS-4 Housing Rehabilitation: Unfortunately, the City was not able to start affordable housing program in time to report accomplishments in PY 2020. The City is currently working with Habitat for Humanity with affordable housing development projects, and has started the Owner Occupied Housing Rehab Program. This activity (ID #15) is still open and the City anticipates to report accomplishments in the upcoming program year.

CARES Act

ED-1 Employment: In response to small businesses experiencing financial distress from the ongoing effects of the pandemic, the City helped fund small businesses through the Small Business Rental Assistance Grant program. There were 13 LMI persons that were able to retain jobs and 12 small businesses assisted. The City also has a goal to assist 10 businesses with the CDBG-CV Sidewalk Café Business Assistance Program to help eligible business owners furnish approved sidewalk café areas. This activity is to help businesses operate during the pandemic as well as prevent the spread of COVID-19. This activity was recently started and accomplishments will be reported in upcoming program years.

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	172
Black or African American	19
Asian	0
American Indian or American Native	0
Native Hawaiian or Other Pacific Islander	0
Total	191
Hispanic	1
Not Hispanic	190

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

Narrative

DATA TABLE NOTE: Due to IDIS input constraints, the table above does not include a category for people identifying as “other multiracial”. According to activity data generated from the PR-03 CDBG Summary of Activities, there also 26 “other multiracial” assisted for a total of 217 persons assisted. For the purposes of this CAPER report, this assessment will also include the 26 “other multiracial” persons assisted.

According to the 2015-2019 ACS 5-Year Estimates, an estimated 73.2% of the population was White and 8.9% were Black or African American persons. Asians were 1.2% and American Indian or Native Americans were 1.0% of the total population. “Some other race” was 11.1% and “Two or more” races were 4.6%. Persons who identified as ethnically Hispanic were 41.3%.

In general, persons that benefitted from the CDBG program were in alignment with the racial composition of the City. Those classified as White received 79% of funding and Black or African American received an estimated 9% of all CDBG funding in the program year. “Some other” race received 12% of all funding. Asians, American Indian or Native Americans, and Native Hawaiians or Other Pacific Islanders received little or none at all. By ethnicity, the City needs to identify more persons who are Hispanic for program services. According to the PR-03, the City assisted less than 1% of persons identifying as Hispanic with CDBG funds. This may be due to the youth Summer Camp programs reporting by only “other multiracial”.

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	378,056	229,996

Table 3 - Resources Made Available

Narrative

The table above details the resources made available during the program year as well as funds expended during the program year. The resources made available in the table are from the FY 2020 CDBG allocation. The City also had CARES Act Funds made available in the amount of \$519,782 in the program year and further below is a summary of the use of these funds.

In PY 2020, the City of St. Cloud had resources made available from the FY CDBG grant allocation in the amount of \$378,056 and expended \$229,996 on public services and admin of the program. The City also programmed funds towards housing rehab, however these funds were not expended as of yet as the City is still working with Habitat for Humanity to start this program.

CARES Act Funds (CDBG-CV)

To fund activities that helped to prevent, prepare for and respond to the COVID-19 pandemic, the City was allocated two rounds of CDBG-CV funds for a total of \$519,782. The City expended a total \$227,562 in CDBG-CV funds towards COVID-19 preventative activities in support of the Summer Youth Program, the Small Business Rental Assistance Grant program in support of businesses affected by the pandemic and admin of the CDBG-CV program. A description of the amounts used by activity are located in the CR-05.

Identify the geographic distribution and location of investments

Target Area	Planned Percentage of Allocation	Actual Percentage of Allocation	Narrative Description
Citywide	100	100	CDBG public services were provided to LMI residents Citywide.
Low/Mod Areas	0	0	See below.

Table 4 – Identify the geographic distribution and location of investments

Narrative

All CDBG funds were expended on a citywide basis as no specific geographic area have been targeted. The City will however for the purpose of identifying activities for public facilities or infrastructure improvements use Low- and Moderate- income census tract areas as identified by HUD’s CDBG Low Mod Income Summary Data (LMISD). In PY 2020, there were no public facilities or infrastructure improvement activities. HUD CDBG LMISD data can be found at <https://www.hudexchange.info/programs/acs-low-mod-summary-data/>

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 St. Cloud currently only receives HUD CDBG funds for the activities identified in this plan. The City is however working to use CDBG funds to help leverage local and state funds where possible to increase resources to meet the needs of the community. The following other resources may be available to local non-profit and organizations to undertake the housing strategies identified in the City’s plans:

- Osceola Count SHIP funds for housing
- Continuum of Care funds through Homeless Services Network

The City does not have any publicly owned land or property located within the jurisdiction that were used to address the needs identified in the plan. The CDBG grant funding does not require a match.

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	19	0
Number of Special-Needs households to be provided affordable housing units	0	0
Total	19	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	5	0
Number of households supported through Rehab of Existing Units	13	0
Number of households supported through Acquisition of Existing Units	1	0
Total	19	0

Table 6 – Number of Households Supported

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

Unfortunately, the City was not able to complete any affordable housing programs in PY 2020. The City has been working to build its affordable housing program, and has been able to enlist Habitat for Humanity in its Owner-Occupied Housing Rehab Program. The City has one rehab activity open with Habitat for Humanity and anticipates this program to start assisting LMI households in the upcoming program year.

Activities to accomplish established rehab goals in the AAP are already underway and will assist low- and moderate-income families with minor emergency rehabilitation such as leaky roofs, windows, and weatherization improvements to make housing more energy efficient.

The City also has a goal to assist LMI homebuyers with direct financial assistance and housing construction, however the City is still reviewing these activities and are they are still in the process of starting.

Discuss how these outcomes will impact future annual action plans.

Affordable housing development and preservation are high priority needs in St. Cloud. The City is still working to accomplish affordable housing goals, and anticipates it will report these accomplishments in future CAPER reports. The 2020 AAP has allocated CDBG funds towards housing programs and the City will continue to fund housing programs in the future.

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
Extremely Low-income	0
Low-income	0
Moderate-income	0
Total	0

Table 7 – Number of Households Served

Narrative Information

While it is required the minimum overall benefit of CDBG funds is to be at least 70% towards low- to moderate-income (LMI) persons or households, the City estimates it will use 100% towards activities that benefit LMI persons or households.

Unfortunately, there were no outcomes in PY 2020, however the City is working with Habitat for Humanity to start the Owner-Occupied Housing Rehab Program. The City has one rehab activity open with Habitat for Humanity and anticipates this program to start assisting LMI households in the upcoming program year.

Those with worst case needs are persons or households at-risk of or experiencing homelessness and are households with extremely low-income. The City will work to target extremely low-income households with its housing programs.

At this time, there are no households with a disability targeted with housing programs. If, however the City identifies a household with a member that has a disability, the City will make reasonable accommodation to allow for the participation of the household in its programs.

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 St. Cloud relies on the Homeless Services Network of Central Florida (HSNCF), which is the lead agency of the Central Florida Commission on Homelessness Continuum of Care (CoC) to reach the homeless population and also to meet and assess their needs. The City also relies on its many local services agencies to reach and provided services for the homeless population and meet their unique needs. More information on these services providers is found on the CoC website.

HSNCF through the Community HOPE Center is the primary provider of housing and supportive services for the City of St. Cloud's homeless and at risk of being homeless populations. Coordination of programs and funds is accomplished by the local CoC participant agencies in the area along with the administration of the Homeless Management Information System (HMIS) System. HMIS provides a comprehensive system for collecting and disseminating information about persons experiencing homelessness and the service system within the State of Florida.

The local service providers and agencies in St. Cloud (such as St. Cloud Community Pantry, Community Hope Center, Catholic Charities, A Place for Grace, Help Now of Osceola, Church of St. Like & St. Peter, JJCC Assembly of God, First United Methodist Church of St. Cloud) provide food and clothing through food pantries, food kitchens and thrift stores as well as homeless services. These services are available to all residents, including the homeless.

Addressing the emergency shelter and transitional housing needs of homeless persons

The City of St. Cloud refers individuals and families experiencing homelessness to participating members of the Continuum of Care with their emergency shelter and traditional housing needs. There are very few available shelters within the City. Through the HSNCF however, there available shelters are available for the youth, and offer emergency and transitional housing for up to 2 years with case management. Also, the Bridge program offers temporary hotel stays.

The HSNCF also offers transitional services with a rapid rehousing program that offers a time-limited financial support to help with housing cost and then help with transitioning to self-sufficiency through case management and referrals. HSNCF works with a "Housing First" approach that prioritizes permanent housing as a way to end homelessness, as this serves as a platform for individuals and families experiencing homelessness to have their basic needs met before they can pursue other goals to improve their lives. More information can be found at their website: <https://hsncfl.org/housing>

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 St. Cloud supports the efforts of the HSNCF and local agencies that provide services for individuals and families to avoid becoming homeless, in particular those who have already received assistance or are being released from systems of care. Most of the services are referred through the Coordinated Entry System (CES), which is administered by HSNCF. CES is a person-centered process that streamlines access to the most appropriate housing intervention for each individual or family. This system ensures all participants are known by name and through data driven decisions connects these individuals and families between agencies and services. CES prioritizes by greatest need, which allows for more efficient use of already limited community resources. CES has a special process for victims of crime as well, which help to prioritize needed assistance for persons experiencing domestic violence or human trafficking.

Individuals and families assisted through CES may be eligible through one of the CoC's housing programs designed to prevent homelessness such as the Prevention & Diversion program which offers help with rent, utilities, and family reunification. The HSNCF Supportive Housing program, which works with permanent supportive housing solutions provides cost-effective solutions to ending and avoiding homelessness for participants who are now having less interaction with crisis systems such as jails and hospitals. Supportive housing services are also available for chronically homeless individuals with disabilities.

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

The City of St. Cloud will support the efforts of local agencies that provide assistance to families and individuals in transitional states and will refer residents of the City that are at risk of becoming homeless to these agencies for help with financial literacy counseling, emergency rent/mortgage or utility payments, and job training so that they can remain self-sufficient and avoid homelessness.

As mentioned earlier, the HSNCF provides a rapid rehousing program that offers time-limited financial

support to help to homeless individuals and families with housing cost and then help with transitioning to self-sufficiency through case management and referrals. HSNCF works with a “Housing First” approach that prioritizes permanent housing as a way to end homelessness, as this serves as a platform for individuals and families experiencing homelessness to have their basic needs met before they can pursue other goals to improve their lives.

Homeless prevention services are available for youth at Covenant House Florida and Grance Landing. These providers offer temporary homeless shelters and are available for youth ages 18-21 years old.

Rental and utility assistance is also provided in the area for eligible individuals and families seeking to make the transition to permanent housing. These resources are limited, but can be accessed through Catholic Charities, Jewish Family Services, the Osceola County Council on Aging and Osceola County Human Resources.

Veterans and their families are provided a variety of social and housing assistance through The Transition House, Veterans in Crisis, Fighting for our Heroes Foundation and Veteran’s Services.

Finally, there are a large variety of programs and services offered through the HSNCF network such as food banks and hot meal services, clothing banks, food stamps and other cash assistance, Medicaid assistance, legal services, medical referral services and bus services that help to offset some of the basic costs of living while households are working towards independent living.

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

Actions taken to address the needs of public housing

There Osceola County Housing Agency, which is part of the Osceola County Human Service Office administers the Section 8 program in the County and St. Cloud.

The Housing Agency is a partner with the City in addressing the housing needs for the residents of St. Cloud who are very low- and extremely low-income. The City of St. Cloud has identified the need for affordable housing that is decent, safe, and sanitary and the Housing Agency is a valuable resource in addressing and meeting that need. There is a significant number of households in the City that are at or below 50% of AMI that are affected by housing problems, severe housing problems and housing cost burdens.

Currently, the Housing Agency administers 202 Vouchers Housing Choice Vouchers and 28 VASH vouchers. All 202 Housing Choice Vouchers are leased-up and half of the VASH vouchers are currently leased up. The Housing Agency manages 1,600 total vouchers (HCV and Section 8) and 1,300 of those vouchers are ones that have been ported into the County. The Housing Agency has identified that there is a lack of sufficient Housing Choice Vouchers to meet the demand for housing by low income persons.

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

The City partners with the Osceola County Housing Agency which currently maintains a self-sufficiency program under the Housing Choice Voucher Program and will continue to follow all federal requirements governing this program.

Actions taken to provide assistance to troubled PHAs

The Osceola County Housing Agency is not designated as troubled status. The City has reviewed HUD's Inventory Management System (IMS)/ PIH Information Center (PIC) public housing profile site at: https://www.hud.gov/program_offices/public_indian_housing/systems/pic/haprofiles. As reported on the website the Osceola County Housing Agency (FL201 OSCEOLA CO) does not have a performance rating, however according to the PHA's 5-Year PHA Plan (2020) the PHA has maintained a high performer rating for SEMAP since 2007.

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's Analysis of Impediments identified four impediments related to fair and affordable housing. Under each impediment listed, the City provided a goal and strategies to remove identified impediments. The City will address those recommendations and continue to monitor public policies to ensure barriers to affordable housing are addressed. The identified impediments were:

Impediment 1: Fair Housing Education and Outreach

Impediment 2: Need for Affordable Rental Housing

Impediment 3: Need for Affordable Housing for Sale

Impediment 4: Need for Accessible Housing Units That Are For-Sale or Rent

Actions to address these impediments to affordable housing and fair housing choice is discussed at the end of this section.

As well, the City through its Planning and Zoning Department is currently reviewing ordinances. This review includes addressing deficiencies in the ordinances as they relate to the policies on development of affordable housing.

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

The City has identified several underserved needs in the City, including the lack of decent, safe and affordable owner and renter housing, the need for rehabilitation of the City's aging housing stock and the high cost of rehab work, accessibility improvements for persons aging in place and low wages in the service and retail sector job market.

The largest obstacle to meeting these high priority needs were limited resources. To overcome these obstacles the City has had to prioritize activities. In PY 2020, the City prioritized housing programs in the action plan.

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

The City of St. Cloud complied with Title 24 Part 35: Lead-Based Paint Poisoning Prevention in Certain Residential Structures (Current Rule). Lead-based paint (LBP) can pose serious health hazards, particularly in households with young children and potentially affects any structure built prior to 1978, before LBP

usage for housing was banned by law. As a historic urban city with many older housing structures, LBP is a particular concern for a quarter of homes in St. Cloud.

The City required that LBP may not be used in rehab programs funded through the CDBG program. In addition, all CDBG contracts prohibit the use of LBP, as well as a copy of the federal regulations pertaining to the use and removal of LBP, and the requirement to use lead-safe work practices. In the case of identified LBP and required action to remove hazards, the City's procedure was to procure qualified personnel to perform risk management, paint testing, hazard reduction, and clearance services. In the case of lead poisoning and elevated Blood Lead Levels (BLL), the City's will closely with the state health department should young children with these symptoms be identified to determine and ameliorate the cause. Additionally, the City ensured a number of activities to address LBP hazards in its affordable housing programs.

For Rehabilitation Programs the City ensured that:

- All rehabilitation activities follow HUD regulations concerning lead-based paint assessment and any necessary interim controls.
- Applicants for rehab funding receive the required LBP info and understand their responsibilities.
- Staff properly determines whether proposed projects are exempt from some or all LBP requirements.
- The level of federal rehab assistance is properly calculated, and the applicable LBP requirements determined.
- Properly qualified personnel perform risk management, paint testing, lead hazard reduction, and clearance services when required.
- Required lead hazard reduction work and protective measures are incorporated into project rehab specifications.
- Risk assessment, paint testing, lead hazard reduction, and clearance work are performed in accordance with the applicable standards established in 24 CFR Part 35.
- Required notices regarding LBP evaluation, presumption, and hazard reduction are provided to occupants and documented.
- Program documents establish the rental property owner's responsibility to perform and document ongoing LBP maintenance activities, when applicable.
- Program staff monitors owner compliance with ongoing LBP maintenance activities, when applicable.

For Homeownership Programs the City ensured that:

- Applicants for homeownership assistance receive adequate information about LBP requirements.
- Staff properly determines whether proposed projects are exempt from some or all LBP requirements.
- A proper visual assessment is performed to identify deteriorated paint in the dwelling unit, any common areas servicing the unit, and exterior surfaces of the building or soil.

- Prior to occupancy, properly qualified personnel perform paint stabilization and the dwelling passes a clearance exam in accordance with the standards established in 24 CFR Part 35.
- The home purchaser receives the required LBP pamphlet and notices.

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

The City’s anti-poverty strategy is based on attracting a range of businesses and supporting workforce development, including job-training services for low income residents. These economic development activities help to directly reduce the number of persons living in poverty in St. Cloud.

In addition, the City continues to partner with local social service organizations that target low-income residents with services that help improve their quality of life. Finally, the City worked to launch housing activities identified in its 2020 Annual Action Plan which work directly to reduce poverty in St. Cloud. These activities included housing programs such as emergency rehab, which help maintain housing conditions that will help households avoid homelessness, however these activities are still underway.

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

The City’s Principle Planner coordinated activities among the public and private agencies and organizations in the City. This was to ensure the goals and objectives of the Five-Year Consolidated Plan would be addressed by more than one agency. The Principle Planner also facilitated and coordinated the linkages between these public-private partnerships and develop new partnership opportunities.

Effective implementation of the Consolidated Plan involves a variety of agencies both in the community and in the region. Coordination and collaboration between agencies is important to ensuring that the needs in the community are addressed. The key agencies that are involved in the implementation of the Plan, as well as additional resources that may be available, are described below.

Public Sector:

- City of St. Cloud - Mayor’s Office
- City of St. Cloud - City Clerk
- City of St. Cloud - Building Department
- City of St. Cloud - Public Service Department
- City of St. Cloud - Police Department
- City of St. Cloud - Fire Department
- City of St. Cloud - Procurement Department
- City of St. Cloud - Park and Recreation Department

Non-Profit Agencies:

There are several non-profit agencies that serve target income households in the City of St. Cloud. The

City will collaborate with these essential service providers. Some of them include:

- Osceola County Human Services Office
- Children’s Advocacy Center
- St. Cloud Community Pantry
- Community Hope Center
- A Place for Grace
- Habitat for Humanity
- The Transition House

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

The primary responsibility for the administration of the Annual Action Plan is assigned to the Principle Planner at the City of St. Cloud. This position coordinated activities among the public and private organizations, in their efforts to implement different elements and to realize the prioritized goals of the Annual Action Plan. The City is committed to continuing its participation and coordination with public, housing, and social service organizations. The City solicits funding requests for CDBG funds. These requests were reviewed and discussed by the Planning and Zoning Director, Planning and Zoning Manager, Principle Planner, and CRA Specialist.

The City of St. Cloud also works with and relies on the Homeless Services Network of Central Florida (HSNCF), which is a participating member of the Florida Continuum of Care (CoC). The work of the HSNCF is to outreach to the homeless population in the area and also to meet and assess their needs. HSNCF through the Community HOPE Center is the primary provider of housing and supportive services for the City of St. Cloud's at-risk of homeless and homeless populations. Coordination of programs and funds is accomplished by the local CoC participant agencies in the area along with the administration of the Homeless Management Information System (HMIS) System. HMIS provides a comprehensive system for collecting and disseminating information about persons experiencing homelessness and the service system within the State of Florida.

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 St. Cloud prepared an Analysis of Impediments to Fair Housing Choice (AI) to coincide with the City's 2019-2023 Five Year Consolidated Plan. The AI identified four impediments related to fair and affordable housing. Under each impediment listed, the City provided a goal and strategies to remove identified impediments. Below are the actions the City has taken or will take to address each impediment.

Impediment 1: Fair Housing Education and Outreach

Action Taken: City Council proclaimed April as “Fair Housing Month” in 2020 and will continue this practice

in the coming years. The City has and will continue to monitor and review public policies for discriminatory practices and/or impacts on housing availability during this program year. In addition to the proclamation, the City developed activities to promote fair housing such as:

- Distributed pamphlets on Tenant’s Rights and Fair Housing to: City Hall, the Libraries, social service organizations, charitable organizations, and code enforcement officers to handout during inspections.
- Displayed the Fair Housing Poster “It’s Not an Option – It’s the Law.”
- Provided fair housing information to landlords.
- Fair Housing Proclamation from City Council.

Impediment 2: Need for Affordable Rental Housing

Action Taken: In the prior program year, the City amended its Action Plan to include emergency rental assistance. This activity was to assist eligible low-income households who are at risk of homelessness with emergency financial assistance and security deposits. Unfortunately, the City was not able to implement this program and will work to identify new future affordable rental housing activities in the Consolidated Plan period.

Impediment 3: Need for Affordable Housing for Sale

Action Taken: The City included a project to create new affordable housing development activities in its 2020 AAP. These activities included the acquisition of property and development fees to reduce the cost of a new house so Habitat for Humanity can develop affordable housing in the City and closing cost assistance for income eligible homebuyers to purchase a single-family home.

As well, the City through its Planning and Zoning Department is currently reviewing ordinances. This review includes addressing deficiencies in the ordinances as they relate to the policies on development and sale of affordable housing. The City will continue to address the recommendations and continue to monitor public policies to ensure barriers to affordable housing are addressed.

Impediment 4: Need for Accessible Housing Units That Are For-Sale or Rent

Action Taken: The City will continue to address this impediment in future Annual Action Plans during the Consolidated Planning period. However, as mentioned earlier the City proposed activities in the 2020 AAP included the acquisition of property and development fees to reduce the cost of a new house so Habitat for Humanity can develop affordable housing in the City and closing cost assistance for income eligible homebuyers to purchase a single-family home. In addition to this, the City also proposed housing rehab activities such as a weatherization program to make income eligible homes more energy efficient, and an emergency housing rehab program that corrects emergency situations.

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 of St. Cloud Principal Planner/CDBG Administrator (PPCA) has the primary responsibility for monitoring the City's Consolidated Plan and AAP. It maintains records on the progress toward meeting the goals and the statutory and regulatory compliance of each activity. Service area documentation is maintained along with income surveys. Timeliness of expenditures is achieved through scheduling activities, drawdown of funds, and maintenance of budget spread sheets which indicate the dates of expenditures. Program modifications are considered if project activities are not able to be completed within the allowable time limits of the grant. The City PPCA is also responsible for the on-going monitoring of any sub-recipients for similar compliance.

The City PPCA has a "monitoring checklist" that is utilized when programs and activities are reviewed. This checklist was developed in accordance with Sub-Part J of 24 CFR, Part 85 "Uniform Administrative Requirement for Grants and Cooperative Agreements of State and Local Governments" and the HUD CPD Monitoring Handbook (HUD 6509.2)

CDBG funded activities are monitored periodically, during the construction phase, and a final inspection is performed which details the cost benefit and benefit to LMI persons. During the on-site inspections, compliance with the local building and housing codes are reviewed. Copies of financial statements and audit reports are required and kept on file. For those activities which trigger Davis-Bacon Wage Rates, employee payrolls are required prior to payments and on-site employee interviews will be held. These monitoring standards are required for all City administered projects and sub-recipient activities.

For each activity authorized under the National Affordable Housing Act, the Community Development Department (CDD) has established fiscal and management procedures that will ensure program compliance and fund accountability. Additionally, CDD will ensure that the reports to HUD are complete and accurate.

Subrecipient Annual Risk Assessment

Formal monitoring sessions are conducted once a year, at the end of the program year. All subrecipients conduct an annual risk-assessment and may be identified as high-risk or low risk subrecipients. CDD will conduct a full onsite monitoring for all high risk subrecipients. CDD staff may elect to conduct only a desk monitoring for low risk subrecipients.

MBE/WBE Owned Businesses

All procurements made in whole or in part with CDBG funds must comply with the applicable Federal requirements found in 24 CFR Part 200.317-326 (referred to as the "Common Rule"). This includes small,

minority and/or women-owned businesses to the maximum extent feasible for the use local businesses and contracts.

Section 3 Report

The Section 3 Report, as applicable, was submitted in SPEARS, as required. The City will comply with Section 3 of the Housing and Urban Development Act of 1968 (12 U.S.C 1701u) and implementing regulations at 24 CFR Part 75.

Civil Rights Program Requirements

The City requires itself and subrecipients to abide and be governed by Title VI and VII, Civil Rights Act of 1964 (42 U.S.C. §§ 2000 D & E) and Title VIII of the Civil Rights Act of 1968, as amended, which provides in part that there will not be discrimination of race, color, sex, religion, or national origin, in regard to persons served, or in regard to employees or applicants for employment. Also adhered to is the Age Discrimination Act of 1975, as amended, 42 U.S.C. §§ 6101 et seq., in that there shall be no discrimination against persons in any area of employment because of age. The City also adheres to Section 504 of the Rehabilitation Act of 1973, as amended, 29 U.S.C § 794 and Title III of the American with Disabilities Act, Public Law 101-336, which prohibits discrimination on the basis of disability.

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 of St. Cloud adheres closely to its HUD approved Citizen Participation Plan which guides the City in providing citizens adequate opportunity to participate in the development of planning and review of performance reports in community planning and development programs as per 24 CRF 91.105.

During the development of the PY 2020 AAP, the City held a public comment period and a public hearing. Under the provision of the Coronavirus Aid, Relief and Economic Security Act (CARES Act) the City held a public comment period less than 30 days. The public comment review period was held from August 20, 2020 to September 10, 2020. The Action Plan could be downloaded and viewed from the City website. Written comments could be addressed to the Community Development Director, City of St Cloud, 1300 9th Street, Building A, St. Cloud, FL 34769. The Plan could also be viewed at the office from Monday through Friday, 9AM to 4PM. There were no comments made on the plan during the comment period.

A public hearing was held on September 10, 2020 at 6:30PM during City Council to review and approve the Annual Action Plan. City council voted for and approved the plan. There were no additional comments made from the public.

PY 2020 CAPER Citizen Participation

To meet the requirements for citizen participation for the PY 2020 CAPER, the City gave notice in a local paper that the draft report would be available for a 15-day public comment and review period and a public hearing at a regular City Council meetings to discuss the CAPER. The following is a summary of these efforts.

PUBLIC COMMENT PERIOD: All interested citizens are encouraged to participate. The draft CAPER will be available to the public to review from November 4, 2021 to November 18, 2021 at the St. Cloud Community Development Department, 1300 9th Street, Bldg. A, St. Cloud, FL 34769 or downloaded from the City's website at: <https://www.stcloudfl.gov/2015/Community-Development-Block-Grant>

Written comments on the CAPER may be submitted using the address above or emailed to the Grants Administrator at eburnette@stcloud.org

PUBLIC HEARING: A public hearing will be held at a regularly schedule City Council meeting on November 18, 2021 at 6:30 PM. City Council meetings are held at City Hall in Council Chambers located at 1300 9th Street, Bldg. A, 3rd level, St. Cloud, FL 34769.

ACCESSIBILITY: In accordance with the Americans with Disabilities Act, persons needing assistance to participate in any of these proceedings should contact the Secretary/Clerk of the Committee/Board, Linda P. Jaworski, City Clerk at 1300 9th Street, St. Cloud, Florida 34769 or (407) 957-7300 prior to the meeting. If language assistance is required, residents may contact Erin Burnette, Grants Administrator, City of St. Cloud at (407) 957-7173 to make those arrangements.

A copy of the public notice and other proof of citizen participation is attached as a PDF in the CR-00.

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 PY 2020 CAPER is the second year of the City’s 5-Year 2019-2023 Consolidated Plan and there were no changes made to the City’s priorities and goals in the program year. The priorities and goals remain from the 5-Year plan and the Strategic Plan continues to be the basis of the City’s CDBG program.

If at any point in the future the City determines there is a need to revise objectives identified in the Annual Action Plans or the Consolidated Plan, the City will follow amendment procedures to the plans and any citizen participation requirements as a result of the amendment.

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

No