



PY 2022 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 as designated by the U.S. Department of Housing and Urban Development (HUD), and PY 2022 is the fourth program year of the City's first 5-Year 2019-2023 Consolidated Plan. As an entitlement grantee, the City was allocated \$357,697 in federal Community Development Block Grant (CDBG) funds, which 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 year the City submits an Annual Action Plan (AAP), which describes the City's resources and uses of funds. A Consolidated Annual Performance and Evaluation Report (CAPER) reports on the progress of the City's activities towards its goals in meeting the needs of the community in the AAP and overall 5-Year plan. PY 2022 accomplishments are highlighted below:

Public Services: The City assisted a total of 1,684 LMI persons with vital public services in PY 2022. Of this total, there were 20 youth assisted with services through the Summer Youth Internship Program, 4 seniors assisted through an Adult Day Health Care program and 1,660 LMI assisted with meals through the Council On Aging Food Pantry program.

Affordable Housing: The City is still working on starting affordable housing development projects. These activities include rehabilitation of rental units for seniors at Tracey Manor Rental Rehabilitation and weatherization activities for homeowners. These activities are a priority and the City anticipates the program will report accomplishments within the Consolidated Plan period.

Economic Development: There was one (1) small business assisted with direct financial assistance to help retain employment of its workers. This activity is associated with CDBG-CV funding for small businesses still recovering from the impacts of the pandemic.

Public Facilities and Infrastructure: The City is still planning on activities that will improve the quality of life of residents living in low/mod areas of St. Cloud. Planned activities will include improvements to neighborhood facilities, parks, and streets/sidewalks.

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	4	80.00%	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%	7660	0	0.00%
CD-1 Community Facilities	Non-Housing Community Development	CDBG CDBG-CV	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	0	628	0.00%			
CD-1 Community Facilities	Non-Housing Community Development	CDBG CDBG-CV	Other	Other	0	0	0.00%			
CD-2 Infrastructure	Non-Housing Community Development	CDBG	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	Persons Assisted	0	0	0.00%	7660	0	0.00%
CD-2 Infrastructure	Non-Housing Community Development	CDBG	Other	Other	0	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	2540	725.71%	150	1684	1122.67%
CD-4 Public Safety	Non-Housing Community Development	CDBG	Other	Other	0	0	0.00%			
CD-5 Clearance/Demolition	Non-Housing Community Development	CDBG	Buildings Demolished	Buildings	0	0	0.00%			
CD-6 Transportation Development	Non-Housing Community Development	CDBG	Other	Other	0	0	0.00%			
ED-1 Employment	Non-Housing Community Development	CDBG CDBG-CV	Facade treatment/business building rehabilitation	Business	0	0	0.00%			
ED-1 Employment	Non-Housing Community Development	CDBG CDBG-CV	Jobs created/retained	Jobs	30	25	83.33%	15	1	6.67%
ED-1 Employment	Non-Housing Community Development	CDBG CDBG-CV	Businesses assisted	Businesses Assisted	0	12	0.00%			
ED-2 Development	Non-Housing Community Development	CDBG	Jobs created/retained	Jobs	0	0	0.00%			
ED-2 Development	Non-Housing Community Development	CDBG	Businesses assisted	Businesses Assisted	0	0	0.00%			

ED-3 Redevelopment	Non-Housing Community Development	CDBG	Businesses assisted	Businesses Assisted	0	0	0.00%			
ED-3 Redevelopment	Non-Housing Community Development	CDBG	Other	Other	0	0	0.00%			
ED-4 Access to Transportation	Non-Housing Community Development	CDBG	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	0	0	0.00%			
ED-4 Access to Transportation	Non-Housing Community Development	CDBG	Other	Other	0	0	0.00%			
HO-1 Housing	Homeless	CDBG	Homeless Person Overnight Shelter	Persons Assisted	0	0	0.00%			
HO-1 Housing	Homeless	CDBG	Overnight/Emergency Shelter/Transitional Housing Beds added	Beds	0	0	0.00%			
HO-1 Housing	Homeless	CDBG	Housing for Homeless added	Household Housing Unit	0	0	0.00%			
HO-1 Housing	Homeless	CDBG	Other	Other	0	0	0.00%			
HO-2 Operation/Support	Homeless	CDBG	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	0	0	0.00%			
HO-2 Operation/Support	Homeless	CDBG	Tenant-based rental assistance / Rapid Rehousing	Households Assisted	0	0	0.00%			

HO-2 Operation/Support	Homeless	CDBG	Homeless Person Overnight Shelter	Persons Assisted	0	0	0.00%			
HO-2 Operation/Support	Homeless	CDBG	Overnight/Emergency Shelter/Transitional Housing Beds added	Beds	0	0	0.00%			
HO-2 Operation/Support	Homeless	CDBG	Homelessness Prevention	Persons Assisted	0	0	0.00%			
HO-3 Prevention and Re-Housing	Homeless	CDBG	Tenant-based rental assistance / Rapid Rehousing	Households Assisted	0	0	0.00%			
HO-3 Prevention and Re-Housing	Homeless	CDBG	Homelessness Prevention	Persons Assisted	0	0	0.00%			
HS-1 Homeownership	Affordable Housing	CDBG	Direct Financial Assistance to Homebuyers	Households Assisted	25	0	0.00%			
HS-2 Rental Housing	Affordable Housing	CDBG	Public service activities for Low/Moderate Income Housing Benefit	Households Assisted	0	0	0.00%			
HS-2 Rental Housing	Affordable Housing	CDBG	Tenant-based rental assistance / Rapid Rehousing	Households Assisted	0	0	0.00%			
HS-3 Housing Construction	Affordable Housing	CDBG	Rental units constructed	Household Housing Unit	0	0	0.00%			
HS-3 Housing Construction	Affordable Housing	CDBG	Homeowner Housing Added	Household Housing Unit	4	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%	25	0	0.00%
HS-4 Housing Rehabilitation	Affordable Housing	CDBG	Housing Code Enforcement/Foreclosed Property Care	Household Housing Unit	0	0	0.00%	100	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	0.00%			
SN-1 Housing	Non-Homeless Special Needs	CDBG	Rental units rehabilitated	Household Housing Unit	0	0	0.00%			
SN-1 Housing	Non-Homeless Special Needs	CDBG	Homeowner Housing Added	Household Housing Unit	0	0	0.00%			
SN-1 Housing	Non-Homeless Special Needs	CDBG	Homeowner Housing Rehabilitated	Household Housing Unit	0	0	0.00%			
SN-1 Housing	Non-Homeless Special Needs	CDBG	Housing for People with HIV/AIDS added	Household Housing Unit	0	0	0.00%			
SN-1 Housing	Non-Homeless Special Needs	CDBG	HIV/AIDS Housing Operations	Household Housing Unit	0	0	0.00%			

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	0.00%			
SN-2 Social Services	Non-Homeless Special Needs	CDBG	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	0	0	0.00%			

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

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

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 PY 2022, the fourth program year of the planning period, the City was able to complete some activities to further address these needs. The following is a description of how funds were expended within the program year.

Public Services (#31 Adult Day Care & #32 Food Pantry): \$27,638.00

Administration: \$81,952.69

(Note: The City has also programmed its CDBG funds towards housing rehab and public facility improvements, and once these activities have started the City will meet grant expenditure guidelines. Only 15% of each annual allocation may be spent on public services, and no more than 20% may be used on admin costs)

CARES Act Funds

To fund activities that helped to prevent, prepare for and respond to the COVID-19 pandemic, the City was allocated a total of \$519,782 in CDBG-CV funds. These funds have already been programmed and the City currently plans to spend these funds within the next year. The following CDBG-

CV funds were spent in PY 2022, which leaves a remaining balance of \$103,262.65.

CDBG-CV Small Business Rental Assistance Grant program: \$10,000.00

CDBG-CV Administration: \$50,974.40

PY 2022 Goals and Accomplishments Comparison

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

CD-1 Community Facilities & CD-2 Infrastructure: The City has a goal to assist 7660 persons living in low/mod areas with public improvements, however this goal was not met in PY 2022. The City is working on identifying projects as this is a need and will report benefits in future CAPERs.

CD-3 Public Services: The City had a goal to assist 150 LMI persons with public services and assisted 1,684 LMI persons. There were three public services activities, which were the 2022 Summer Youth Internship Program with 20 LMI children assisted, the OCOA Adult Day Health Care program with 4 elderly assisted and the Council On Aging Food Pantry that provided food assistance to 1,660 LMI persons.

HS-4 Housing Rehabilitation: Unfortunately, the City was not able to complete affordable housing programs in time to report accomplishments in PY 2022. Current open activities include rental rehab at the Tracey Manor Rental Rehabilitation project and weatherization activities for homeowners with the OUC Weatherization program.

CDBG-CV Accomplishments in PY 2022

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 to help create/retain jobs. There was 1 LMI person assisted with this program in PY 2022.

CR-10 - Racial and Ethnic composition of families assisted

Describe the families assisted (including the racial and ethnic status of families assisted).

91.520(a)

	CDBG
White	1,023
Black or African American	77
Asian	28
American Indian or American Native	0
Native Hawaiian or Other Pacific Islander	0
Total	1,128
Hispanic	1,086
Not Hispanic	599

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 or multiracial”. While the table above shows 1,128 persons assisted, there were also 557 “other or multiracial” assisted for a total of 1,685 persons assisted.

According to the 2017-2021 ACS 5-Year Estimates, the population of St. Cloud was 57,610 and an estimated 59.2% of the population identified as White and 9.5% as Black or African American. Asians persons made up 1.8% of the population and American Indian or Native Americans were 0.8% of the total population. “Some other race” made up 15.0% and “Two or more” races were 13.8%. Persons who identified as ethnically Hispanic made up 45.6% of the population.

In general, persons that benefitted from the CDBG program were in alignment with the racial composition of the City. Of program participants, 60.7% were White, 4.6% were Black or African Americans, and 1.7% were Asian of those assisted with CDBG funding in the program year. “Some other” race received 33.0% of all funding. By ethnicity, 64.5% of persons assisted with CDBG funds were Hispanic.

Housing Needs Assessment

The Needs Assessment in the 2019-2023 Consolidated Plan, assesses if any racial and ethnic group by income category has a disproportionate need in the area with regards to housing problems, severe housing problems and cost burden. Households with housing problems are those that reside in units lacking complete kitchen and plumbing facilities as well as overcrowding (more than one person per room) and cost burden (spending 30% or more of income on housing per month). Households with severe housing problems are those that reside in units lacking complete kitchen and plumbing facilities as well as severely overcrowded homes (more than 1.5 person per room) and severe cost burden (spending 50%

or more of income on housing per month).

NA-15 Housing Problems: According to the Needs Assessment, minority race groups that have a disproportionate need in housing problems are extremely low-income Asian households, very low-income American Indian and Alaska Native households and Hispanic households, and low-income Black or African American households.

NA-20 Severe Housing Problems: Minority race groups that have a disproportionate need in severe housing problems are extremely low-income Asian households and very low-income American Indian and Alaska Native households.

NA-25 Cost Burden: For housing cost burden, Black or African American households have a disproportionate need with housing cost burden (30% of income towards housing costs). There were no minority groups that had a disproportionate need with “severe housing cost burden” (50% or more of income towards housing costs).

In comparing the disproportionate needs of certain race/ethnic groups as described by the Needs Assessment to the beneficiary outcomes provided, the City annually assists black or African American, Asian and Hispanic households. While other minority groups such as American Indian or Native Americans, and Native Hawaiians or Other Pacific Islanders are smaller in number, the City will include these groups in its programs whenever possible.

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	357,697	109,591

Table 3 - Resources Made Available

Narrative

The table above details the resources made available during the program year as well as funds expended. The total resources made available in PY 2022 were \$357,697 through the annual CDBG allocation.

The City of St. Cloud only expended \$109,591 on public services and admin of the program. The City has already programmed all remaining unspent funds through the AAP, with a bulk of resources allocated towards housing rehab and economic development activities. These activities are underway, and it is anticipated these funds will be spent in the upcoming program year. The City also focused on the CDBG-CV program in the program year as there was a need to quickly assist LMI persons recover from the impacts of the pandemic.

Public Services (#31 Adult Day Care & #32 Food Pantry): \$27,638.00

Administration: \$81,952.69

(Note: The City has also programmed its CDBG funds towards housing rehab and economic development activities, and once these activities have started the City will meet grant expenditure guidelines. Only 15% of each annual allocation may be spent on public services, and no more than 20% may be used on admin costs)

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. In PY 2022, the City expended another \$60,974.40 towards small business assistance and admin of the CV program. Total CDBG-CV expenditures to date are \$416,519.35 which leaves a balance of \$103,262.65 remaining as of this report. A PR-26 CDBG-CV Financial Report has been uploaded as an attachment to the CR-00 for confirmation.

Identify the geographic distribution and location of investments

Target Area	Planned Percentage of Allocation	Actual Percentage of Allocation	Narrative Description
Citywide	100	100	Citywide, eligible
Low/Mod Areas	N/A	N/A	N/A

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 2022, 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 County 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 was 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	25	0
Number of Special-Needs households to be provided affordable housing units	0	0
Total	25	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	25	0
Number of households supported through Acquisition of Existing Units	0	0
Total	25	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 2022. The City has been working to build its affordable housing program, and unfortunately no affordable housing activities have been completed yet. The City, however, has two affordable housing development activities open which will help to satisfy this need. These activities include rental rehab at the Tracey Manor Rental Rehabilitation project and weatherization activities for homeowners with the Weatherization program.

Housing rehabilitation remains a priority, and the City will work to accomplish the established rehab goals in the AAP which will assist low- and moderate-income families with minor emergency rehabilitation. The City anticipates that all the assistance provided will consist of rental rehabilitation and weatherization improvements to make housing more energy efficient.

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 its established affordable housing goals, and anticipates these accomplishments will be reported within the Consolidated Plan period. The 2022 AAP allocated CDBG funds towards housing programs and as this is a priority need, the City will continue to fund housing programs in the future. The City currently has two open activities and anticipates these activities will be completed in the upcoming program year.

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 affordable housing outcomes in PY 2022, however the City currently has two open housing activities and anticipates these activities will be completed in the upcoming program year.

Worse Case Needs

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 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 populations and those at risk of becoming homeless. Coordination of programs and funds is carried out 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 transitional housing needs. There are very few available shelters within the City. Through the HSNCF however, emergency shelter is available for local youth. HSNCF also offers 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 relevant 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 who are transitioning to permanent housing and independent living, and will refer City residents 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 Grace 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 supportive 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

The Osceola County Housing Agency, which is part of the Osceola County Human Service Office, administers the Section 8 program in the County and in the City of 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. The Housing Agency is a valuable resource in addressing and meeting that need. A significant number of households in the City are at or below 50% of AMI and are affected by severe housing problems and housing cost burdens.

Currently, the Housing Agency administers 230 Housing Choice Vouchers, including 28 VASH vouchers and 40 mainstream vouchers. The Housing Agency manages 1,719 total vouchers, including 1,489 vouchers 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.

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 was approved on July 25, 2019. It 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.

In addition, the City is currently reviewing ordinances through its Planning and Zoning Department. 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. The City is in the process of utilizing a large portion of CDBG funds to rehabilitate affordable rental units for seniors at Tracy Manor. While the project has not reported any beneficiaries in the 2022 program year, the City expects to complete the project during the 2023 program year.

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 about a quarter of the 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 any case where LBP is identified in a home that is undergoing CDBG-funded work, the City's procedure is 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 continues to work closely with the state health department so that any young children with these symptoms can be quickly identified and the cause is immediately addressed.

For Rehabilitation Programs the City will ensure 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 will ensure 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)

Projects and activities developed in the ConPlan and the Annual Action Plans are aimed at reducing the number of poverty-level families in the City, especially those that benefit LMI individuals and households. The City’s anti-poverty strategy emphasizes the importance of economic development in poverty reduction through financial and technical support of LMI-, women-, and minority-owned businesses, workforce development, job training, and more. 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. In PY 2022, the City funded a Summer Youth Internship program to support LMI families in addition to Osceola Council on Aging’s food pantry. Future planned activities aimed at reducing poverty-level families include housing programs such as emergency rehab, which help maintain housing conditions that will help households avoid homelessness, and business grants programs to support local LMI businesses.

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

The City’s Economic Development Department continues to coordinate activities among the public and private agencies and organizations in the City. This is to ensure the goals and objectives of the Five-Year Consolidated Plan would be addressed by more than one agency. Effective implementation of the Consolidated Plan involves a variety of agencies both in the community and in the region. 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 listed 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 collaborates 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 City of St. Cloud’s EDD. The EDD 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 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 City of St. Cloud approved the 2019 AI at its regular City Council meeting on July 25, 2019. 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 continues this practice each year. 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 2021 program year, the City was unable to prioritize affordable rental housing in its Action Plan but has begun to address this impediment and will continue to do so in future Annual Action Plans. The City’s rehabilitation of affordable units at Tracy Manor will enable the City to maintain essential affordable units.

Impediment 3: Need for Affordable Housing for Sale

Action Taken: The City will continue to address this impediment in future Annual Action plans during the Consolidated Planning period. In addition, the City, through its Community Development Department, continues to review 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. The City’s plans to rehabilitate affordable units for seniors at Tracey Manor will include essential accessibility improvements to these units.

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's Economic Development Department (EDD) 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 EDD is also responsible for the on-going monitoring of any sub-recipients for similar compliance.

The EDD 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 construction 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 EDD has established fiscal and management procedures that will ensure program compliance and fund accountability. Additionally, EDD 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. The City conducts an annual risk-assessment for all subrecipients, and may identify high-risk or low risk subrecipients. EDD will conduct a full onsite monitoring for all high risk subrecipients. EDD 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.

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.

Comprehensive Planning Requirements

The comprehensive planning requirements include the development and consolidated plan process of the 5-Year ConPlan, the AAP, and CAPER. Citizen participation is a vital part of the Consolidated Plan process, and the City will make sure to follow its HUD approved Citizen Participation Plan (CPP) which helps guide the City to gather information which is an essential component in identifying the priority housing and community development needs in St. Cloud. These priority needs form the basis of the City's Strategic Plan in the ConPlan and annual goals and activities carried out in each subsequent AAP.

The ConPlan is developed every 5 years, with identified priority needs and goals to address these needs. Each year of the 5-Year plan, the City develops an AAP which identifies the projects and activities that will address and further the goals of the plan. This plan is required to be submitted to and approved by HUD each year to receive CDBG funding annually. At the end of each AAP program year, the City will report on the accomplishments and performance of the program through the CAPER. Citizen participation is required in the development of each of these stages as per 24 CFR 91.105. This PY 2022 CAPER is the fourth program year of the 2019-2023 Consolidated Plan.

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 CFR 91.105.

During the development of the PY 2022 AAP, the City held a 30-day public comment period and a public hearing. The public comment review period was held from May 26, 2022 to June 26, 2022. The Action Plan could be downloaded and viewed from the City website. Written comments could be addressed to the Economic 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 June 9, 2022 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 2022 CAPER Citizen Participation

To meet the requirements for citizen participation for the PY 2022 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 were encouraged to participate. The draft CAPER was available to the public to review from November 17, 2023 to December 8, 2023 at the St. Cloud Economic 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 could be submitted using the address above or emailed to the CDBG Program Manager at CDBG@stcloudfl.gov.

There were no comments received during the public comment period.

PUBLIC HEARING: A public hearing was held at a regularly schedule City Council meeting on December 14, 2023 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.

There were no comments received at the public hearing.

ACCESSIBILITY: In accordance with the Americans with Disabilities Act, persons needing assistance to participate in any of these proceedings could contact the Secretary/Clerk of the Committee/Board, Ivy Llauro, City Clerk at 1300 9th Street, St. Cloud, Florida 34769 or (407) 957-7300 prior to the meeting. If language assistance was required, residents could contact the 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 2022 CAPER is the fourth 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 from the 5-Year plan and the Strategic Plan continue 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.

CDBG-CV

In response to the COVID-19 pandemic, the CARES Act was voted into law to assist impacted residents. CDBG-CV funds were granted to entitlement communities, including the City of St. Cloud, to fund activities that prevent, prepare for and respond to the coronavirus. The total amount of CDBG-CV funds awarded to the City was \$519,782.

In PY 2022, the City expended another \$60,974.40 towards small business assistance and admin of the CV program. Total CDBG-CV expenditures to date are \$416,519.35 which leaves a balance of \$103,262.65 remaining as of this report. These funds have already been programmed towards a public service activity that will distribute food to vulnerable persons still impacted by the pandemic. The City will continue to closely monitor the continued impact of the pandemic and continue to address the needs of LMI residents as they arise. CDBG-CV accomplishments have been summarized in the CR-05 and expenditures are detailed in the CR-15.

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

No

CR-58 - Section 3

Identify the number of individuals assisted and the types of assistance provided

Total Labor Hours	CDBG
Total Number of Activities	0
Total Labor Hours	0
Total Section 3 Worker Hours	0
Total Targeted Section 3 Worker Hours	0

Table 8 – Total Labor Hours

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

Outreach, engagement, or referrals with the state one-stop system, as designed in Section 121(e)(2) of the Workforce Innovation and Opportunity Act.	0
Other.	0

Table 9 – Qualitative Efforts - Number of Activities by Program

Narrative

HUD made effective on October 29, 2020 a Final Rule, which set new benchmarks for Section 3 under 24 CFR 75. The purpose of Section 3 is to establish more economically sustainable communities by ensuring that employment and other economic opportunities generated by Federal assistance, such as CDBG development programs are directed towards very low- and low-income persons to the greatest extent possible. The program in particular attempts to provide these economic opportunities to those who are recipients of the Federal assistance. The Final Rule changes tracking the number of qualified new hires in Section 3 projects, to tracking the total labor hours worked by qualified Section 3 workers.

The benchmark for Section 3 workers was set at 25 percent or more of the total number of labor hours worked by all workers on a Section 3 project. The benchmark for Targeted Section 3 workers was set at 5 percent or more of the total number of labor hours worked by all workers on a Section 3 project.

Section 3 activities cover housing rehab/construction and public improvement construction activities assisted under HUD grant programs that provide housing and community development financial assistance that exceeds a threshold of \$200,000 per activity. A \$100,000 activity threshold applies to grants under HUD's Lead Hazard Control and Healthy Homes programs. In PY 2022, there were no activities that were subject to the Section 3 reporting threshold.