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.

Plan Year 2016 began focused on four activities: The City of Coeur d'Alene funded one Community Opportunity Grant project for St. Vincent de Paul to use CDBG funds to purchase the H.E.L.P. Center which is currently being leased. St. Vincent de Paul's H.E.L.P. Center provides office space and basic operation functions in a one-stop-shop so the LMI persons can make inquiries and receive services from employment searches to housing assistance to basic health care. St. Vincent de Paul was awarded the Community Opportunity Grant funds to completed this process. The City was approached by St. Vincent de Paul of North Idaho with a request to receive funds that would allow them purchase the H.E.L.P. Center, which they are currently leasing. By substantial amendment, completed in February 2016, the City approved the change of funding receipient from The Shepard's Table to St. Vincent de Paul. The substantial amendment also included a increase to the COG allocation. The increase from \$119,330 to \$162,840 included the funds originally allocated for sidewalk repair and replacement in the amount of \$43,510; Improvement to the City's sidewalks; and the Emergency Minor Repair and Accessibility Program (EMRAP). This extremely popular program is designed to help low-to-moderate income homeowners correct building conditions that threaten the health and safety of the owner/occupants, the soundness of their home or makes improvements to correct accessibility issues. Thirteen projects have been completed and closed in Plan Year 2016, However an additional eight projects were completed and paid using PY 2016 funds after April 1, 2017 and an additional 3 projects will be completed by the middle of August using the remaining PY 2016 funds. The City also began an annual allocation to the Lake City Center to help with the Meals on Wheels program. The allocation will be between \$3,000 and \$5,000 each year. PY 2016 allocated \$3,000.

The City's CDBG allocation of \$310,681 for PY 2016 is not large enough to fund substantial housing projects or rehabilitation on a neighborhood size scale. The City focuses on partnerships and collaborations where their modest funding, may tip the balance toward a successful project. The City of Coeur d'Alene remains committed to supporting and promoting activities and programs that benefit LMI residents as well as all our citizens. The City advocates education and outreach to create a strong, involved, and aware populous who want to participate in community improvement. The City hopes for continued growth of the Entitlement Program with widespread benefits through increased participation from stakeholders, innovative proposals, and public enthusiasm.

Comparison of the proposed versus actual outcomes for each outcome measure submitted with the consolidated plan and explain, if applicable, why progress was not made toward meeting goals and objectives. 91.520(g)

Categories, priority levels, funding sources and amounts, outcomes/objectives, goal outcome indicators, units of measure, targets, actual outcomes/outputs, and percentage completed for each of the grantee's program year goals.

Goal	Category	Source / Amount	Indicator	Unit of Measure	Expected - Strategic Plan	Actual – Strategic Plan	Percent Complete	Expected - Program Year	Actual – Program Year	Percent Complete
1-Increase For Sale Affordable Housing	Affordable Housing	CDBG: \$0	Public Facility or Infrastructure Activities for Low/Moderate Income Housing Benefit	Households Assisted	2	2	100.00%			
2-Increase Affordable Rental Housing	Affordable Housing Homeless Non-Homeless Special Needs	CDBG: \$0	Public Facility or Infrastructure Activities for Low/Moderate Income Housing Benefit	Households Assisted	20	12	60.00%			
3-Sidewalk Accessibility	Non-Housing Community Development	CDBG: \$14600	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	Persons Assisted	1000	600	60.00%	200	0	0.00%

4- Neighborhood Revitalization	Non-Housing Community Development	CDBG: \$237160	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	Persons Assisted	0	0		500	776	155.20%
4- Neighborhood Revitalization	Non-Housing Community Development	CDBG: \$237160	Public Facility or Infrastructure Activities for Low/Moderate Income Housing Benefit	Households Assisted	0	0		500	569	113.80%
4- Neighborhood Revitalization	Non-Housing Community Development	CDBG: \$237160	Homeowner Housing Rehabilitated	Household Housing Unit	30	64	213.33%	8	13	162.50%
5-Economic Development	Non-Homeless Special Needs	CDBG: \$0	Businesses assisted	Businesses Assisted	1	0	0.00%			
6-Public Service	Non-Homeless Special Needs	CDBG: \$3000	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	0	0		30	0	0.00%
6-Public Service	Non-Homeless Special Needs	CDBG: \$3000	Public service activities for Low/Moderate Income Housing Benefit	Households Assisted	25	34	136.00%			

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.

Their are currently three EMRAP projects using PY 2016 funds scheduled to be completed in the next 2 months, along with eight projects that were completed after the program year ended, which brings the total served to 23. These projects were put on hold due to weather and/or the contractor's schedule. Due to the substantial amendment completed in February 2016, the funds for the PY 2015 Community Opportunity Grant receipient were not expended until PY 2016 at which time the St. Vincent de Paul project was closed out. Another portion of the substantial amendment completed in February included an increase to the PY 2014 Community Opportunity Grant Program in the amount \$37,000, this increase was awarded to the Boys and Girls Club for architect and engineering cost associated with the new facility located in Coeur d'Alene. The funds were reallocated using the PY 2014 sidewalk funds and a portion of the general admininstrative funds. All PY 2014 and PY 2015 funds will be expended during PY 2016. Sidewalk projects are scheduled and assumed to be two yearlong projects using city staff. However, City Council has requested staff concentrate on bringing the downtown sidewalks into ADA compliance. Therefore, staff is unavailable for a couple of years, so funds were reallocated for timely expenditure of CDBG funds.

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	11
Black or African American	0
Asian	0
American Indian or American Native	1
Native Hawaiian or Other Pacific Islander	1
Total	13
Hispanic	1
Not Hispanic	0

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

Narrative

According to the most current ACS Demographic Data, Coeur d'Alene has a minority population of 6.2%. The City has an open door policy that does not allow for discrimination of any kind based on race or ethnic background. Any and all documents, including applications for Community Opportunity Grants and the Emergency Minor Repair and Accessibility Program can be translated into any language upon request.

CR-15 - Resources and Investments 91.520(a)

Identify the resources made available

Source of Funds	Source	Resources Made	Amount Expended
		Available	During Program Year
CDBG	CDBG	606,974	523,848
HOME	HOME		
HOPWA	HOPWA		
ESG	ESG		
Other	Other		

Table 3 - Resources Made Available

Narrative

The City has had additional funds drawn down for PY 2016 activities in the amount of \$25,988.58 not accounted for in the Actual Amount Expended Program Year 2016 due to those request being completed after 3/31/2017. The City Street Department is currently working on their schedule so that a portion of the City's sidewalks can be upgraded as soon as possible. The City of Coeur d'Alene receives no federal funding in addition to CDBG for housing and non-housing community development and there are no matching requirements for the City's CDBG program.

Identify the geographic distribution and location of investments

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

Table 4 – Identify the geographic distribution and location of investments

Narrative

The City's program planning is focused toward the number of persons that can be helped, and identifying projects that will produce the best benefit for the investment, rather than being geographically focused.

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 Coeur d'Alene does not require match for projects under the Community Grant Opportunity Program, or for those projects initiated through the City's open door policy. Only projects that demonstrate a complete and reasonable budget are considered for funding. Right now there are no projects currently identified that would require the use of public lands, the City is always open to potential projects and partnerships they may use public lands for the benefit of their LMI citizens.

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	500	776
Number of Non-Homeless households to be		
provided affordable housing units	500	569
Number of Special-Needs households to be		
provided affordable housing units	0	0
Total	1,000	1,345

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	8	13
Number of households supported through		
Acquisition of Existing Units	0	0
Total	8	13

Table 6 - Number of Households Supported

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

The homeless and non-homeless goal was exceeded by St. Vincent de Paul of North Idaho, these goals were met after the purchase of the H.E.L.P. Center. The Rehab of Existing homes goal has been exceeded every year since the City began the Emergency Minor Repair and Accessibility Program.

Discuss how these outcomes will impact future annual action plans.

The City has currently surpassed most of their target goals and are currently on target to achieve our goals for PY 2016 funding and will continue to focus on our long term goals as set in our 2013-2017 Consolidated Plan and our PY 2017 Annual Action Plan.

Include the number of extremely low-income, low-income, and moderate-income persons served by each activity where information on income by family size is required to determine the eligibility of the activity.

Number of Households Served	CDBG Actual	HOME Actual
Extremely Low-income	3	0
Low-income	6	0
Moderate-income	4	0
Total	13	0

Table 7 – Number of Households Served

Narrative Information

Due to the City's relatively limited CDBG funding allocation, the main focus for use of these funds is our City's LMI population. All work completed using CDBG funds are for the benefit of LMI residents with the exception of our administrative cost. The city's average over the last eight years is 82% of all CDBG funding received is used to benefit our LMI.

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 works closely with local organizations such as St. Vincent de Paul, North Idaho Housing Coalition, IHFA, the Region 1 Homeless Coalition (Continuum of Care), Safe Passage, Trinity Group Homes and other government and non-profit organizations to identify areas of need in the community. The City keeps close contact with all of the area housing and homeless agencies and stakeholders on all faucets of the City's Entitlement Program including public hearings/forums, Community Opportunity Grants and Fair Housing Training.

The City's CDBG Administrator attends the Region 1 Homeless Coalition Meeting as well as the quarterly IHFA Housing Roundtable meetings. The City's CDBG Administrator is currently the Chair of the Balance of State CoC Strategic Planning Committee and is heavily involved with this program.

All area agencies are invited to apply for CDBG Community Opportunity Grants when available.

Addressing the emergency shelter and transitional housing needs of homeless persons

The City receives no funding beyond their CDBG Entitlement for homelessness activities. St. Vincent de Paul North Idaho distributes McKinney-Vento funding through the Supportive Housing Program (SHP), Shelter Plus Care Program (S+C) and Emergency Solutions Grant Program (ESG). Additionally, St. Vincent de Paul operates a project called Angel Arms that provides funding for 10 single unit apartments for chronically homeless individuals. The program also provides intensive weekly case management, which begins with a self-sufficiency plan that includes job training services, substance abuse counseling, Life Skills classes, parenting classes, financial literacy classes, etc. Other available emergency shelters include the Children's Village, St. Vincent de Paul Woman's Shelter, St. Vincent de Paul Men's Shelter, St. Pius Church, Safe Passage and the OASIS Post Falls Police Department, a county wide emergency shelter located outside of Coeur d'Alene. Together these shelters provide beds to people in need of housing. Realistically, homelessness is a chronic problem and will never be totally eliminated. Some barriers to ending homelessness such as poor and non-existent housing stock and lack of jobs can be addressed by local governments, though correcting those problems are not quick or easy fixes.

In 2016 HUD awarded \$3,776,606 to support 45 homeless housing and service projects across Idaho. This award included funding to St. Vincent de Paul and Family Promise for their permanent and transitional housing projects located in Coeur d'Alene.

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 obstacles to meeting underserved needs are as varied as the individuals who seek assistance. As organizations and agencies record program activities including successes and failures, adjustments are made to the process, to incorporate the most effective methodologies and modify or eliminate those that are not working. The process is on-going and flexible (within the confines of established regulations) as possible to address the conditions and circumstances adherent to Coeur d'Alene.

The H.E.L.P. Center, run by St. Vincent de Paul North Idaho, is an excellent start for transitioning people from homelessness to independence. This innovative partnership provides office space and basic operating functions in a "one stop shop" so that LMI persons can make inquiries and receive services from employment searches to housing assistance to basic health care with various organizations represented on site. The Ten Year Plan to End Homelessness describes the following approaches to combat homelessness in the Coeur d'Alene area: 1. Develop better data collection and coordination of agency efforts. 2. Identify and increase the inventory of available affordable housing stock. 3. Improve economic development opportunities and coordinate the response among local governments. 4. Deploy the Housing First model for Permanent Supportive Housing. 5. Create a One-Stop-Shop to end the practice of having individuals who are struggling and have no transportation, from being moved from one agency (and location) to the next when seeking services. 6. Increase community awareness to draw new and concerned voices to the table to help win the battle against homelessness.

St. Vincent de Paul along with other area homeless and domestic violence agencies, including the City's CDBG administrator are extremely involved with the Region 1 Homeless Coalition and the Balace of State CoC Program. Currently the Balance of State CoC is undergoing a complete update to their HMIS reporting system requirements in order to meet HUD's seven System Performance Measures.

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

Barriers created or exacerbated by the homeless individuals are varied, as are the methods to mitigate those barriers. Lack of education, job training, and financial management skills can be provided through government-funded programs; the success of those efforts is unpredictable and not always permanent,

and depends on a certain level of commitment by the homeless individual. Barriers involving health and mental health issues require different, and often more expensive resources, and a greater commitment to change by the homeless person. With more resources being cut from the state budget, it is harder for local service organizations to continue to serve this population. Plans and programs can provide resources, encouragement, even a system of rewards or punishments, but no one solution will work for everyone. The City and other partners in the Ten Year Plan to End Homelessness will concentrate their efforts on helping as many persons as possible, using all resources at their disposal. The City does not currently have a discharge policy or have direct responsibility for discharge planning and protocols for persons leaving publicly funded institutions or health care systems. These responsibilities are handled at the State level directly through the Department of Corrections and Health and Welfare for persons still enrolled in their systems as they are required to find suitable housing before discharge.

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

Actions taken to address the needs of public housing

Idaho Housing and Finance Association (IHFA) serves the housing needs of the Idaho Panhandle, including the City of Coeur d'Alene. IHFA has an established system for providing service, which is well received within the region. IHFA administers the Section 8 program in the City of Coeur d'Alene. During 2016 IHFA the Section 8 Housing Choice Voucher program provided approximately \$2,005,536 in vouchers to 444 families in the City of Coeur d'Alene and \$4,244,929 into Region One. Under the HUD Direct Program IHFA spent approximately \$1,421,000 in Coeur d'Alene as well as an addtional \$270,000 under the Project Based Section 8 Program. According to IHFA this funding seems to remain fairly steady and dollar figure changes are minimal from "year to year".

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

The City agreed to have the North Idaho Housing Coalition (NIHC) administer the Neighborhood Stabilization (NSP) funds. NIHC works with families and individuals throughout north Idaho. Of the approximately 109 families assisted in Kootenai County between 2009 and 2016, 26 have been residents of Coeur d'Alene. The City strongly supports the NIHC goals to help provide affordable and workforce housing. NIHC works with families that are LMI; approximately 30% of the total families assisted are at 50% of the median and below and 80% of the total families assisted are at 120% of the median and below. NIHC has received \$22 million in NSP and HOME funding through 2016. NIHC has started a new program to help qualifying individuals with rental assistance. Though this program is relatively new they have already helped 11 individuals and families with rental assistance in north Idaho, of which 3 were located in Coeur d'Alene.

Through the use of the NSP funding, NIHC works to acquire foreclosed homes and rehabilitates them as needed. The homes are then marketed to potential buyers that meet the NSP qualifications. NIHC assists qualified buyers with closing costs and mortgage reductions, based on need. Buyers obtain a mortgage loan through the lender of their choice and sale proceeds are returned to the NSP program managed by IHFA. NIHC requires participants to contribute a minimum of \$500 toward the housing purchase and to participate in credit counseling if needed. Participants also contribute to the community by donations of time through the Deeds of Distinction program. Several local non-profits have benefitted from hours of community service, such as the Food Bank, St. Vincent de Paul, Family Promise, United Way, Special Olympics and numerous churches and schools. NIHC uses HOME funds to assist families with incomes at or below 80% of the area median income in purchasing a home. This program is similar to the NSP program (purchase, rehabilitation, and reselling) but is not limited to foreclosed properties. The City fully supports NIHC and will continue to concentrate on identifying new avenues for partnerships to expand on NIHC accomplishments. The City continues to consider all partnership opportunities that may arise with local and statewide agencies for affordable housing projects within the city limits of Coeur d'Alene for LMI resident.

Actions taken to provide assistance to troubled PHAs

The PHA has not been designated as troubled, and the City feels it would be redundant, expensive, and inefficient for the City to attempt to create a jurisdictional service separate from the current program. The likelihood of failure is unforeseeable; however, if the system were to fail, the City would work with the State and local service organizations to determine the best method of forming a new system.

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)

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

The City continues to work with local organizations such as St. Vincent de Paul, North Idaho Housing Coalition, IHFA, the Region I Homeless Coalition (aka Continuum of Care), and other government and non-profit organizations to identify areas of need and appropriate activities to mitigate the problems as resources allow. The H.E.L.P. (Helping Empower Local People) Center is an excellent partner in this process. An innovative partnership lead by St. Vincent de Paul provides office space and basic operating functions in a one stop shop so that LMI persons can make inquiries and receive services ranging from employment searches to housing assistance to basic health care. The obstacles to meeting underserved needs are as varied as the individuals who seek assistance. As organizations and agencies record program activities including successes and failures, adjustments are made to the process to incorporate the most effective methodologies and modify or eliminate those that are not working. The process is ongoing and as flexible as possible (within the confines of established regulations) to address the conditions and circumstances relevant to Coeur d'Alene. Additionally, the City will continue to support warming shelters and the annual Project Homeless Connect events.

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

All EMRAP applications that are mailed or handed to potential clients includes a "Protect Your Family From Lead in Your Home" pamphlet. The CDBG administrator also has a list of EPA approved and certified lead abatement contractor's that can be used if needed as well as lead testing facilities to complete lead clearance exams if required.

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

The City promotes workforce development and has been a strong supporter of the education corridor, which provides access for local residents to four institutions of higher learning (University of Idaho, North Idaho College, Lewis-Clark State College, Idaho State University). Additionally the Workforce Development Center and K-Tech offer job training and adult education opportunities beyond standardized secondary education. Providing services to at-risk-youth is another priority for the City. Coeur d'Alene is diligent in seeking the best childcare regulations and encouraging growth of the industry so that working families can find affordable childcare. The City supports the local Head Start agency and agrees that education is an important step in eliminating the cycle of poverty. Because transportation costs can be a large portion of the personal budget, the City is a partner with the Coeur

d'Alene Tribe and other local jurisdictions in a regional bus system, CityLink, which provides public transportation. The City contributes approximately \$43,990 annually to the program plus they pay an annual dues of \$9,955 to CityLink. Mid-size buses, approximately 32 passengers, run established routes from Plummer on US Highway 95 to Coeur d'Alene, Hayden, Post Falls and Rathdrum. Three routes have been established, two in the urban areas, and a third (the rural route) which connects the populations centers with the regions to the south. CityLink buses are accessible by ramp for persons who are physically unable to enter by the stairs and equipped with bicycle racks for those are combining modes of transportation. Unfortunately, CityLink has experienced some budget cuts which has necessitated the reduction of some stops but the City has relayed the importance to the community of a stop close to the H.E.L.P. Center.

The City has committed to a number of strategies to help reduce poverty including partnerships with organizations such as Jobs Plus for job creation and Ignite CDA for economic development to provide better opportunities within the community. Also, there have been improvements to infrastructure including sidewalk repair/replacement in LMI neighborhoods to revitalize them which assists in alleviating burdens allowing people to focus their efforts elsewhere.

The City's anti-poverty strategy recognizes that individuals and their situations differ; there are those individuals who are capable of being gainfully employed and those who are not and housing stock available in an affordable price range. Persons with debilitating diseases, persons with disabilities, and frail elderly are often limited in their ability to generate household income through employment. On the other hand, full-time employment does not always provide sufficient income to lift a household out of poverty, and income assistance can become a disincentive to work.

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

The City's belief is that agencies such as IHFA, who have been acting as the regions public housing authority for many years, have a well-established, successful, and time-tested process in place to deliver needed services to the area. It is the City's position that programs which are meeting the requirements of the residents should be encouraged to request assistance when needed, and that the City's nominal resources can be best used to support the network of organizations and programs already in place.

The City of Coeur d'Alene is the lead agency for the CDBG funding. The City has established goals under their Consolidated Plan, and will work to integrate City planning, and projects with the related activities of other agencies in the area. Many of the activities to assist low/moderate income persons, special needs individuals, the homeless, and other disadvantaged groups in Coeur d'Alene and Kootenai County area are delivered through well-established programs under the direction of established organizations and agencies such as Idaho Housing and Finance Association (IHFA) and the Disability Action Center. Other programs such as the H.E.L.P. Center, Supportive Housing Program (SHP), Shelter Plus Care Program and Emergency Solutions Grant Program (ESG) are overseen by St. Vincent de Paul North Idaho, or other local not for profit organizations.

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

The City of Coeur d'Alene along with their administrator attend meetings on a regular basis to foster a communication network with these agencies and to remain informed regarding local and regional programs; these meetings include the Region 1 Homeless Coalition monthly meetings and the IHFA Quarterly Housing Roundtable meetings. The City provides support as appropriate and practical, including web postings, information on the City's CDATV local broadcast station, distribution of printed materials, consultations and other aid as requested.

The City's CDBG administrator is currently the Chair of the Strategic Planning Committee for the Balance of State CoC. This committee is set with the task to create policies and procedures for data collection, reporting, evaluation, and system changes to be used by the Balance of State CoC once HUD's seven System Performance Measures are adopted.

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 will continue to write letters of support for projects seeking LMI tax credits that fit the goals of the Consolidated Plan. The City continues to seek additional methods of encouraging developers to construct LMI housing. With the help of the new Housing Needs Assessment, the City hopes to be able to start new partnerships for LMI housing opportunities.

As with most communities, the major barrier facing households and individuals trying to obtain homeownership are the limitations regarding home loans for low/moderate income persons. The City has an excellent record of working with local organizations such as Jobs Plus to promote the City as an optimal place to establish a business. The local community college (North Idaho College) and Workforce Development Center provide opportunities for individuals to upgrade and improve employment skills. The City is working with the University of Idaho, Lewis-Clark State College, and Idaho State University to finalize an education corridor and provide better opportunities for residents to reach a level of education or expertise that will assist them in achieving living wage employment while creating additional jobs at the colleges.

The City continues to co-sponsor Fair Housing training and education. The City, along with Spokane County, the City of Spokane, the State of Washington, the Northwest Fair Housing Alliance, the Spokane Low Income Housing Consortium and HUD sponsor a large fair housing conference held in Spokane, WA annually during Fair Housing Month. This event is well established with an average attendance of 350 people over its first four years. While Spokane is in another state, it is a short 30 minute commute and is a regional hub that shares many of the same population and service providers as Coeur d'Alene.

The City is currently working on their new Affirmatively Furthering Fair Housing Plan. They have created a "working group" to help determine the City's biggest Fair Housing issues that currently exist. Future

plans include a group of public forums held throughout the city to obtain input from the citizens of Coeur d'Alene.

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

Monitoring can vary by project and activity. The City communicates with Panhandle Area Council (PAC) on an almost weekly basis, either by phone or email, regarding program activities, compliance issues, and outreach actions. The City uses the appropriate monitoring checklists for the individual projects to ensure that pertinent questions and concerns are addressed and documented. The City will continue to refine this process to be in line with HUD's expectations.

The City and PAC meet on the 4th Thursday of each month to discuss overall program issues and to plan for futures activities and requirements. Records maintained at PAC are open to the City and funding agencies. The City and PAC maintain records of meetings with grantees and sub-recipients, photographic records of projects as they are implemented, and meets with project participants during the planning, implementation, and closeout phases, as well as, on request should partners have questions, concerns or suggestions. The City feels monitoring is essential and can be used as a tool for outreach and public education. Communication (with documentation) is a key element of all projects untaken through the City's Entitlement program. Questions and concerns are addressed as they arise, and when a programmatic issue is identified, actions to correct the item are incorporated into the overall communications and monitoring plan. Determining realistic schedules has been the most common issue to be addressed.

Panhandle Area Council is always available to answer questions for grant recipients and assist to ensure timelines are realistic in nature, while meeting the City's expectations for timeliness. The City of Coeur d'Alene has instituted a comprehensive monitoring and technical assistance program designed to promote communication and accountability. The monitoring process consists of four components: 1) Pre-Assessment, 2) Desk Monitoring, 3) On-Site Monitoring, and 4) Ongoing Technical Assistance. Panhandle Area Council, as Administrators under the City of Coeur d'Alene's CDBG Entitlement Program, has added to their sub-recipient review process the HUD Exhibit Checklist K, OMB Circular A-133 Audits of States, Local, Governments, and Non-Profit Organizations. The Federal Audit Clearinghouse will be used to obtain audit and reporting information.

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 strictly follows its Citizen Participation Plan. Public hearings are held during regularly-scheduled City Council Meetings and are conducted as needed or required. The City held multiple public

hearings and forums for PY 2016 including; forums/hearings for the Annual Action Plan, the PY 2015 CAPER. The City always encourages its citizens to attend these hearings and to log on to the City's website to view any current and past plans available. All City Council meetings and public hearings are televised on CDA TV, channel 19 or they can view the archived recordings found on the City's website. The public comment period for the PY 2016 CAPER began July 17, 2017, with a legal advertisement in the Coeur d'Alene Press, and will be open until the public hearing on August 1, 2017. The public is encourage to attend the hearing and give comments regarding the CDBG program as a whole and the CAPER for PY 2016. All proposed actions under the Entitlement Program are reviewed for compliance under HUD regulations, specifically that they meet a national objective, constitute an eligible activity, and address one of the goals established by the City within its Consolidated Plan.

All documents related to the City's CDBG program can be found at the city's website – www.cdaid.org under the Residents tab then click on "CDBG" to find all documents related to the CDBG program.

The public comment period for the PY 2017 Annual Action Plan began July 17, 2017 and was open until the public hearing held August 1, 2017 during the City Council meeting. A public forum for the Annual Action Plan was held on July 24, 2017. The public was encouraged to attend the forum to help us gather public input on these critical issues.

CR-45 - CDBG 91.520(c)

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

The City of Coeur d'Alene has not changed its goals and/or its objectives and have had no significant negative experiences effecting its CDBG program to date.

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

No

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

CR-45 - CDBG 91.520(c)

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

The City of Coeur d'Alene has not changed its goals and/or its objectives and have had no significant negative experiences effecting its CDBG program to date.

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

No

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