

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 2018 focused on four main activities: Dispersment of the City of Coeur d'Alene's Community Opportunity Grant fund totaling \$191,820; a Sidewalk Improvement Program for projects in LMI Census Tracts totaling \$14,600.00; an Emergency Minor Repair and Accessibility Program for qualifying households totaling \$50,000.00; a non-competitive annual grant for Lake City Center's Meals on Wheels Program for LMI Seniors totaling \$5,000.00. After a public and competitive process, dispersment of the Community Opportunity Grants included funding to the below agencies in the following amounts: TESH, Inc. was awarded \$52,251.00 for Energy Efficiency modifications for their Coeur d'Alene campus serving adults living with disabilities; Lake City Center was awarded \$94,201.10 in exterior Public Facility site modifications for water drainage improvement; North Idaho College Foundation, Inc. was awarded \$42,770.40 for Workforce Training Scholarships to serve eligible Coeur d'Alene students with tuition aid.

Plan Year 2018 project status details include the following. At the conclusion of Plan Year 2018, March 31, 2019, the three Community Opportunity Grants awarded were in progress but were not completed. Completion dates vary based on each project but all three grants are reasonably expected to be completed with funds drawn down by March 31, 2020. The City's 2018 Sidewalk Improvement Program for LMI Census Tract funding was funded at \$14,600.00. Sidewalk Improvement funds have been tentatively committed to the LMI census tract where Fernan Elementary is located north of 21st and Sherman Avenue in Coeur d'Alene. A project in this location is in its planning stage with project completion aimed at summer of 2019 or summer of 2020. The City's Emergency Minor Home Repair and Accessibility Program (EMRAP) is an extremely popular program designed to assist single-unit Coeur d'Alene homeowners correct building conditions that threaten the health and safety of the owner/occupants, the soundness of their home, or make improvements to improve ADA accessibility. During plan year 2018, 16 projects were completed with EMRAP funds using 2015, 2016, and 2017 Plan Year funding sources. EMRAP budgets for Plan Year 2015 and 2016 were fully drawn down by 3/31/2019. Due to the City's late funding allocation for PY 2018, no homes were rehabilitated with PY 2018 EMRAP funds; however, four potential projects are expected to draw down all remaining PY 2017 EMRAP funds and eight potential projects are expected to begin drawing down significant portions of PY 2018 EMRAP budget by summer of 2019.

The City's CDBG allocation of \$318,476 for Plan Year 2018 was 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 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: \$	Public Facility or Infrastructure Activities for Low/Moderate Income Housing Benefit	Households Assisted	2	0	0.00%			
2-Increase Affordable Rental Housing	Affordable Housing Homeless Non-Homeless Special Needs	CDBG: \$	Public Facility or Infrastructure Activities for Low/Moderate Income Housing Benefit	Households Assisted	5	2	40.00%	1	2	200.00%

3-Sidewalk Accessibility	Affordable Housing Non-Housing Community Development	CDBG: \$	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	Persons Assisted	600	0	0.00%			
3-Sidewalk Accessibility	Affordable Housing Non-Housing Community Development	CDBG: \$	Public Facility or Infrastructure Activities for Low/Moderate Income Housing Benefit	Households Assisted	2	0	0.00%	60	0	0.00%
4- Neighborhood Revitalization	Affordable Housing Non-Housing Community Development	CDBG: \$	Homeowner Housing Rehabilitated	Household Housing Unit	35	16	45.71%	10	16	160.00%
5-Economic Development	Non-Housing Community Development	CDBG: \$0	Businesses assisted	Businesses Assisted	1	0	0.00%			
6-Public Service	Affordable Housing Homeless Non-Homeless Special Needs	CDBG: \$	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	100	182	182.00%	10	182	1,820.00%
6-Public Service	Affordable Housing Homeless Non-Homeless Special Needs	CDBG: \$	Public service activities for Low/Moderate Income Housing Benefit	Households Assisted		0			0	

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

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

Affordable housing is the highest priority for the City of Coeur d'Alene's 2018-2022 Consolidated Plan. By minor amendment completed in March of 2018, the City’s amended its budgeted allocations with the following minor change: the City moved \$1,377.75 from Administration into the EMRAP budget, increasing the EMRAP budget from \$50,000 to \$73,272.17 in order to comply with HUD regulations relating to using Administration funds by their prescribed program year. This small increase will support an average of 10-20 EMRAP projects which will take place in PY 2019 utilizing PY 2018 funds. The City’s popular EMRAP program assists homeowners in Coeur d’Alene with housing stability by providing maintained or improved livability measures in homes. There are currently eight potential EMRAP projects using PY 2018 funds that will likely be completed by September of 2019, with many more applications expected to be accepted. The City has completed 46% of its 5-year goal for EMRAP with the expectation to far exceed its goal of 35 homes assisted with EMRAP by 2022.

The City relies on area partners to collaborate on more expensive projects such as increasing for sale affordable housing and increasing the supply of affordable rental housing. Area partners have the opportunity to apply to the Community Opportunity Grant, funded by the City's CDBG Grant. Eligible application would include activities that would support both of these key goals. There have been no application which have come forward during PY 2018 however there are four years left in the City's 5-year consolidated plan to meet this goal. The City will continue to advertise and encourage applications through the Community Opportunity Grant which would increase affordable housing.

During PY 2018 the City was able to complete two projects which were awarded through its PY 2017 Community Opportunity Grant. These grants supported housing for the homeless and precariously housed: Safe Passage, a women's violence prevention shelter; Trinity Group Homes, a transitional housing home for adults living with mental illness. These projects qualified as Public Facility Rehabilitation and supported housing which completed 40% of the City's expected 5-Year Consolidated Plan Goal for Public Facility activities supporting LMI housing benefit. It is expected that the City will accomplish its goal of 7 activities supporting affordable housing options for ownership or rent. Local partners continue to be needed to accomplish these high cost goals, however.

Applications for eligible Public Service and Economic Development activities are available each year via the City's Community Opportunity Grant.

The City's expectation is that applications will come forward in its annual Community Opportunity Grant by 2022 to complete each of these goals. Sidewalk improvement is an important goal for CDBG fund usage. A project was identified for PY 2018 but it fell through do to a change in LMI income designations of census block/tracts. A new project is in the works near Fernan Elementary in an LMI census block/tract in Coeur d'Alene with hopeful construction in summer of 2019.

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	342
Black or African American	2
Asian	2
American Indian or American Native	20
Native Hawaiian or Other Pacific Islander	1
Total	367
Hispanic	16
Not Hispanic	351

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 7.4%. 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 Available	Amount Expended During Program Year
CDBG	public - federal	318,476	103,449

Table 3 - Resources Made Available

Narrative

Although funds were not drawn down in their entirety, all funds have been allocated to projects outlined in the Annual Action Plan with accomplishments to be largely complete and reportable in Program Year 2019.

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 does not have established Target Areas or Neighborhood Stabilization Program areas. The homes assisted with EMRAP were located in various locations throughout the City and were not targeted for concentration in any one area, however several EMRAP projects were completed in an LMI census tract which houses the highest concentration of LMI residents in Coeur d'Alene.

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

Table 5 – Number of Households

	One-Year Goal	Actual
Number of households supported through Rental Assistance	0	0
Number of households supported through The Production of New Units	0	0
Number of households supported through Rehab of Existing Units	5	16
Number of households supported through Acquisition of Existing Units	0	0
Total	5	16

Table 6 – Number of Households Supported

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

The City's CDBG'S homeless and non-homeless support goals were exceeded by the City's EMRAP Program as well as its 2018 Community Opportunity Grant program via housing rehabilitation projects (EMRAP) and by the provision of grants to non-profits for rehabilitation to public facilities serving the following homeless and precariously housed LMI populations: persons with severe and persistent mental illness and women and children fleeing domestic violence. EMRAP projects completed in PY 2018 supported 16 households with emergency housing rehabilitation. Community Opportunity Grant

projects completed in PY 2018 supported 318 people who were homeless or precariously housed. 90% of people supported between these projects were below 30% or 50% of HUD's poverty guidelines. Families comprised of the following (from greatest served to least): seniors, families, single adults.

Though the City can anticipate how many EMRAP projects may be implemented in one year it is more difficult to gauge the applications that may be accepted during the Community Opportunity Grant cycle for each year. CDBG funds are available through the Community Opportunity Grants to support applications for Acquisition of Existing Units and Production of New Units; in 2018, however, there were no applications for projects to support these goals. The City encourages projects where all of its goals can be met and will continue its Community Opportunity Grant program in 2018 and into its 2019-2023 plan years.

Discuss how these outcomes will impact future annual action plans.

The City has surpassed many goals in its 2018 Annual Action Plan and is currently on target to meet many of the target goals identified by the City's 2018-2022 Consolidated Plan. The production of new housing units for purchase and for rent is a high-level goal for the City's CDBG Grant. Area partners continue to be informed of funding opportunities to support the development of housing for LMI families.

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	5	0
Low-income	10	0
Moderate-income	1	0
Total	16	0

Table 7 – Number of Households Served

Narrative Information

The City's EMRAP Program serves a majority of LMI widowed seniors as well as small families without children, although families with children does comprise a small percentage of households served.

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

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 10 years is 82% of all CDBG funding received is used to benefit our LMI.

The City focuses on collaborative efforts to reach the maximum homeless and unsheltered aid and relies on communication with area partners who offer direct service to those individuals. In PY 2018, the City awarded two local non-profits with public facility modification grants which improved the access and livability of those structures for homeless and precariously housed persons living in Coeur d'Alene.

The City works closely with local organizations such as St. Vincent de Paul, 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 facets 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 Meetings as well as the quarterly IHFA Housing Roundtable meetings. 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 works closely with local organizations such as St. Vincent de Paul, NIHC, the Committee to End Homelessness, IHFA, the Region 1 Coalition for the Homeless (Continuum of Care) and other government and non-profit organizations to identify area of need and appropriate activities to mitigate the problems as resources allow.

For persons experiencing homelessness and women who are domestic violence victims, there are six

emergency shelters in the County to assist them: Children's Village, St. Vincent de Paul Women's Shelter, St. Vincent de Paul Men's Shelter, St. Pius Church, the Women's Center and the OASIS Post Falls Police Department (which is the only emergency shelter located outside of Coeur d'Alene). Together, these shelters provide beds to 68 people in need of housing because they are homeless.

Family Promise of North Idaho is an interfaith effort to assist homeless families achieve independence. The focus of Family Promise is to keep families together by allowing them to sleep in one of seventeen local host churches, for a week at a time for up to 90 days. Families receive support services, food, and a temporary safe place to sleep.

Fresh Start provides a drop-in facility for the homeless and mentally ill to clean up and receive clothes and food. They also offer computers with internet connection to facilitate job searches and communication with family and other support systems. A mail drop address is provided to further the communication support services they offer. Fresh Start stays open all night, beginning at 7:00 p.m., when the temperatures are expected to drop below 25 degrees and a free medical clinic, Dirne Community Health Center, is available every Thursday morning and some Saturdays.

Union Gospel Mission is a faith-based organization out of Spokane, Washington that has recently expanded across state line to include Coeur d'Alene. They offer a long-term residential recovery center for women with children and women with substance abuse problems. It is located in mid-town Coeur d'Alene and the City granted a special use permit to change from a residential zoning to better facilitate their expansion. Short-term emergency help is also available on a limited basis. Food, shelter, clothing, one-on-one and group therapy sessions, life-skills classes, and a medical clinic are some of the resources they offer.

Under a HPRP grant, St. Vincent de Paul has been tracking accomplishment in two categories: homeless prevention and rapid re-housing. Under the homeless prevention program in 2018 approximately 122 have been served; and under the rapid re-housing program 141 individuals have been served from. Additionally, St. Vincent de Paul operates a homeless family shelter under an Angel Arms grant they received providing funding for ten single unit apartments for chronically homeless individuals. The program also provides intensive weekly case management, which begins with self-sufficiency plan that includes job training services, substance abuse counseling, Life Skills classes, parenting classes, and financial literacy classes.

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's 10-Year Plan to End Homelessness describes the following approaches to combat homelessness in the Coeur d'Alene area, which will continue to be the focus areas of the City's efforts: (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 "bounced" 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.

The City will continue to support the efforts of local service providers and the School District through its 10-Year Plan to End Homelessness.

The Coeur d'Alene School District #271 has identified over 320 homeless students that qualify for the McKinney-Vento unstable housing program in the first half of the 2017-2018 school year. There are 3,534 students that receive free lunch, with another 873 participating in the reduced lunch program. 41% of the District families are living in various degrees of poverty. It is, and will continue to be, important to work together to surround the families with needed services and long-term housing opportunities. Housing is very important to the child's ability to function in the educational environment.

The School District's Hope on the Homefront program assists families in need and work toward removing barriers to education caused by poverty. Through the use of school counselors, the District has been able to connect families with services. Often older students are connected directly to services, such as food backpack programs.

Goals/Benchmarks:

- To end homelessness for children within the School District. Strategies: The School District will continue to work with existing organizations to seek resources to house families and provide long term needed assistance.
- Break the generational cycle of homelessness and poverty. Strategies:

(1) The School District will work with the homeless coalition and existing organizations to establish a job-training program for parents as well as youth;

(2) Continue to provide and increase the number of after-school programs (e.g., CDA for Kids).

(3) Educate children and families to look at long-term goals. Strategies: A financial literacy program would help to educate families to look toward long-term goals.

(4) Continue to train District staff regarding the needs of homeless students. Strategies: Provide training

materials and contact information.

St. Vincent de Paul operates a number of programs aimed at the transition to permanent housing and independent living such as the Fashions for your Future program that helps those looking for work to look their best. Youth are supported with programs such as Art on the Edge, an after-school program filled with public art projects and festivals teaching youth to use art as a tool for problem-solving, goal setting, self esteem and community values. Project Safe Place works directly with at-risk-youth and run-away prevention.

The local H.E.L.P Center and the Department of Labor both serve as resources to connect veterans with services. The 106 Homestead Avenue CDBG project currently houses veterans while also being open to all LMI persons upon vacancy.

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 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 as flexible (within the confines of established regulations) as possible to address the conditions and circumstances adherent to Coeur d'Alene.

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.

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

Actions taken to address the needs of public housing

The 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 2018, IHFA the Section 8 Housing Choice Voucher program provided approximately \$2,361,752 in vouchers to 503 families in the City of Coeur d'Alene and \$4,604,207 into Idaho's Region One, which supported 1,029 families.

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

While no Public Housing exists within Coeur d'Alene City limits, the City is open to all eligible HUD activities relating to housing and homeownership and LMI residents. Local nonprofits are encouraged annually to apply for the Community Opportunity Grant and support housing solutions and homeownership.

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)

A zoning, land use, and housing policy review was completed in conjunction with a statewide Analysis of Impediments to Fair Housing in 2015. The statewide study revealed that there no fair housing barriers in Kootenai County. The City of Coeur d'Alene provides even more options for developing density and increasing affordability than the County indicating that there are no major fair housing barriers in the City. There have been updates since the 2015 Analysis with the current policies below supporting residential investment without excessive zoning ordinances:

- The City allows for 300 SF accessory dwelling units (ADU) in residential and commercial zoning districts. Special permits are not required to build an ADU.
- The City has a density bonus incentive in place in the Downtown Core to induce workforce housing development. The City has a Floor Area Ratio (FAR) calculation used to determine allowable livable space on any given lot in the following areas: Downtown Core (DC) zoning district and the three infill overlay districts (DO-N, DO-E, and MO).

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, 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 on-going 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. The City has chosen to support area seniors in need by provisioning an annual grant to Lake City Center, a senior center which manages the Meals on Wheels program to aid seniors struggling with food security in Couer d'Alene.

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 include 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. Applicants are encouraged to ask questions regarding lead-paint hazards, though no mitigation has every been required of to-date projects implemented withthe City's EMRAP program.

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

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 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.

The City has committed to a number of strategies to help reduce poverty including partnerships with organizations such as Coeur d’Alene Economic Development Corporation-Jobs Plus for job creation and Ignite CDA for economic development to provide better opportunities within the community. Also, there is a new 5-Year Sidewalk Improvement Plan under development to continue the City's ongoing efforts of revitalizing LMI areas by incentivizing different modes of travel and supporting increased access for persons with disabilities.

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 CDBG 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.

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 City's most recent 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 Coeur d'Alene Economic Development Corporation-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 additionally hosts Intermountain Fair Housing Council annually in the Coeur d'Alene downtown's library to have them provide localized training on Fair Housing.

The City will implement an Affirmatively Furthering Fair Housing Plan when appropriate. 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. As no guidance is definitive on the AFFH rule currently, however, the City has not made significant steps towards this Plan.

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 the Housing and Urban Development Agency (HUD) and the Northwest Association of Community Development Managers (NWACDM) members 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 regularly discusses overall program issues and plans for futures activities and requirements. Records are maintained at the City and funding agencies. The City maintains 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 undertaken 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.

The City is always available to answer questions for grant recipients and assist to ensure timelines are realistic in nature, while meeting HUD'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. Administrators under the City of Coeur d'Alene's CDBG Entitlement Program have 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 2018 including forums/hearings for the 2018 Annual Action Plan and the PY 2018 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 Cd'A TV, channel 1301, or they can be viewed in the archived recordings found on the City's website.

The public comment period for the PY 2018 CAPER began June 4, 2019 with a legal advertisement in the Coeur d'Alene Press and will be concluded June 18, 2018 with a public hearing. The public will be encouraged to attend the hearing and give comments regarding the CDBG program as a whole and the CAPER for PY 2018. All proposed actions under the Entitlement Program were 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/cdbg.

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 has had no significant negative experiences affecting 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.

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