

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 2017 focused on four main activities: Dispersment of the City of Coeur d'Alene's Community Opportunity Grant fund totaling \$173,880.00; 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 \$3,000.00. After a public and competitive process, dispersment of the Community Opportunity Grants included funding to the below agencies in the following amounts: Commonwealth Agency, Inc. was awarded \$17,856.20 to begin offering various senior public services; Children's Village was awarded \$24,252.80 for counseling service support to at-risk vulnerable Children; the Boys and Girls Club was funded \$83,000.00 for Architectural and Engineering costs to their new facility, a proposed contract originally entered into during the 2016 Grant Cycle with funding officially concluding its award in 2017; Trinity Group Homes was awarded \$21,333.00 for a flooring rehabilitation project at its transitional group home for the homeless; Safe Passage was awarded \$25,028.00 for a roofing and electrical rehabilitation project at a safe home for women and children fleeing domestic violence.

At the conclusion of Plan Year 2017, that being March 31, 2018, the status of the grant funded projects comprised the following statuses: Commonwealth Agency, Inc.'s contract was signed and work begun on their public service project supporting Coeur d'Alene LMI Seniors at-risk; Children's Village's contract was signed and work begun on their public service project supporting LMI at-risk youth; the Boys and Girls Club contract was signed and the total grant award was dispersed at \$83,000.00 supporting LMI families; Trinity Group Homes' project awaits a HUD determined Davis-Bacon project-type wage determination for its flooring rehabilitation project, thus funds have not been dispersed; Safe Passage's project awaits a HUD determined Davis-Bacon project-type wage determination for its roofing and electrical rehabilitation project, thus funds have not been dispersed. The City's 2017 Sidewalk Improvement Program for LMI Census Tract funding was funded at \$14,600.00, though it has not been dispersed due to poor weather conditions and a lack of scheduling availability in the City's Streets and Engineering Department. 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 correct accessibility issues. During plan year 2017, 19 homes were assisted with EMRAP funds using 2014, 2015, and 2016 Plan Year's funding. All of 2014's, 2015's, and 2016's EMRAP budgets have been drawn down completely with these projects. Due to its late funding allocation, only 1 home has been completed with 2017 Program Year funding; however, there are seven projects in

progress to be completed in summer of 2018.

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	31	155.00%			
3-Sidewalk Accessibility	Non-Housing Community Development	CDBG: \$14600	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	Persons Assisted	600	600	100.00%	200	0	0.00%

4- Neighborhood Revitalization	Non-Housing Community Development	CDBG: \$173880	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	Persons Assisted	0	3246				
4- Neighborhood Revitalization	Non-Housing Community Development	CDBG: \$173880	Public Facility or Infrastructure Activities for Low/Moderate Income Housing Benefit	Households Assisted	0					
4- Neighborhood Revitalization	Non-Housing Community Development	CDBG: \$173880	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	0			1000	1146	114.60%
4- Neighborhood Revitalization	Non-Housing Community Development	CDBG: \$173880	Homeowner Housing Rehabilitated	Household Housing Unit	30	65	216.67%	10	21	210.00%
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	30	100.00%

6-Public Service	Non-Homeless Special Needs	CDBG: \$3000	Public service activities for Low/Moderate Income Housing Benefit	Households Assisted	25	34	136.00%			
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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.

By minor amendment completed in March 2018, the City’s amended its budgeted allocations with the following changes: the City moved \$2,410.00 in funds leftover from the 2017 Community Opportunity Grant Cycle into the 2017 EMRAP program; the City moved \$20,862.17 of funding from the Administration budget into the 2017 EMRAP program to comply with HUD regulations relating to using Administration funds by their prescribed program year. The increase in funds to the EMRAP budget increased the EMRAP’s budget from \$50,000.00 to \$73,272.17.

There are currently four EMRAP projects using PY 2017 funds scheduled to be completed in the next 2 months, which brings the total served to 5 using PY 2017 funds, with the actual accomplishment of 21 EMRAP projects in 2017’s project year, utilizing past years EMRAP budgets. Due to the late receipt of allocation for 2017’s funds, which were dispersed in November of 2017 when the plan year began in April of 2017, the 2017 Community Opportunity Grant funds have not been dispersed entirely; however, the funds were allocated into five large projects serving LMI Coeur d’Alene residents designed to meet the chief community needs, with a small remainder of \$2,410.00 in funding being re-allocated into the 2017 EMRAP program by minor amendment. The funds allocated for the PY 2017 sidewalk fund have intent to be expended as time and staffing allows through the City’s Street and Engineering Department; however, sidewalk projects are assumed to be two yearlong projects. All PY 2014, PY 2015, and PY 2016 funds (with the exception of 2016’s sidewalk improvement funds) have been expended, with all of PY 2017 funds being committed as outlined in the 2017 Annual Action Plan.

The City's CDBG allocation of \$301,850 for Plan Year 2017 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.

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	2,460
Black or African American	62
Asian	31
American Indian or American Native	62
Native Hawaiian or Other Pacific Islander	0
Total	2,615
Hispanic	0
Not Hispanic	2,615

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 6.5%. 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	CDBG	301,850	115,869
HOME	HOME		
HOPWA	HOPWA		
ESG	ESG		
Other	Other		

Table 3 - Resources Made Available

Narrative

Although funds were not drawn down in their entirety, all funds have been allocated and entered into projects with accomplishments to be largely complete and reportable in Program Year 2018.

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

After minor amendment which re-allocated a small portion of funds, Plan Year's 2017 budget focused on four main activities with the following budget limits: Dispersment of the City of Coeur d'Alene's Community Opportunity Grant fund totaling \$171,470.00; 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 \$73,272.17; a non-competitive annual grant for Lake City Center's Meals on Wheels Program for LMI Seniors totaling \$3,000.00. After a public and competitive process, dispersment of the 2017 Community Opportunity Grants included funding to the below agencies in the following amounts: Commonwealth Agency, Inc. was awarded \$17,856.20 for begin offering various senior public services; Children's Village was awarded \$24,252.80 for counseling service support to at-risk vulnerable Children; the Boys and Girls Club was funded \$83,000.00 for Architectural and Engineering costs to their new facility, a proposed contract originally entered into during the 2016 Grant Cycle with funding officially concluding its award in 2017; Trinity Group Homes was awarded \$21,333.00 for a flooring rehabilitation project at its transitional group home for the homeless; Safe Passage was awarded \$25,028.00 for a roofing and electrical rehabilitation project at a safe home for women and children fleeing domestic violence. As of 3/31/2018, the Boys and Girls Club was funded the entirety of their grant with the four remaining grants remaining in process but with no drawn down funds. 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; as of 3/31/2018 no funds have been drawn down or contracts entered into for the Sidewalk Improvement Program. As of 3/31/2018, there is a remaining administration budget of \$6,638.39 which is allocated to support the City's CDBG Administrator and maintain administration of the grant. 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.

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	10	21
Number of households supported through Acquisition of Existing Units	0	0
Total	10	21

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 goals were exceeded by the City's EMRAP Program as well as its 2017 Community Opportunity Grant program, which either supported sustainable housing or provided services for the following LMI populations: persons with severe and persistent mental illness, women and children fleeing domestic violence, for vulnerable children at risk of homelessness, and for LMI seniors with a lack of access to services. Trinity Group Homes won a competitive grant to rehabilitate the flooring of a transitional housing center for adults with severe and persistent mental

illness. Commonwealth Agency, Inc. won a competitive grant to provide public services to area LMI seniors who have food insecurity, housing insecurity, and who are in need of personal safety education. Safe Passage won a competitive grant to rehabilitate the electrical and roofing needs of one of their safe houses which serves women and children fleeing domestic violence. Children’s Village won a competitive grant to expand their counseling services to include serving privately-placed vulnerable children. The accomplishments for all of these projects, however, will likely be reported in PY 2018, and will not be reflected in PY 2017.

The Rehab of Existing homes goal has been exceeded every year since the City began the Emergency Minor Repair and Accessibility Program, which has sustained the livability conditions of primary housing for many Coeur d’Alene LMI residents. CDBG funds are available through the Community Opportunity Grants to support applications for Acquisition of Existing Units and Production of New Units; in 2017, 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 currently surpassed most of its target goals and is currently on target to achieve its goals for its PY 2017 funding and will continue to focus on its long term goals as set in the 2018-2022 Consolidated Plan and the PY 2018 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	1	0
Moderate-income	4	0
Total	8	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 9 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 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 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 2017, HUD awarded \$3.7 million to support 29 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 as 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 Balance of State CoC Program.

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

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 2017 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 additional \$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

While no Public Housing exists within Coeur d'Alene city limits, the City is supportive of the North Idaho Housing Coalition (NIHC), which manages the Neighborhood Stabilization (NSP) FUNDS to encourage low income homeownership. NIHC works with families and individuals throughout north Idaho. Of the approximately 109 families assisted in Kootenai County between 2009 and 2017, upwards of 26 have been residents of Coeur d'Alene. 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 approximately \$22 million in NSP and HOME funding through 2017.

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)

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. A few important differences of the City from the County's housing barrier analysis include the following:

- The City allows for 300 SF accessory dwelling units (ADU) in all 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. Four square feet of floor area is allowed for each square foot of workforce housing provided within 1.5 miles of the project site and within City limits.
- The County's minimum lot size of 3,000 square feet was among the lowest reviewed in the State. Coeur d'Alene accommodates pocket residential in the R-8, R-12, and R-17 residential districts, as well as the C-17L and C-17 commercial districts. Pocket residential has no lot size and setback minimums on the site, but overall density is set by the zoning.

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 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.

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.

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 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 have 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 is difficult to obtain. 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 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 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 the Housing and Urban Development Agency (HUD) and Panhandle Area Council (PAC) 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 future 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 2017 including forums/hearings for the Annual Action Plan and the PY 2017 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 2017 CAPER begins May 21, 2018, with a legal advertisement in the Coeur d'Alene Press, and will be open until the public hearing on June 5, 2018. The public is encouraged to attend the hearing and give comments regarding the CDBG program as a whole and the CAPER for PY 2017. 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/cdbg. 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. 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 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.

CR-45 - CDBG 91.520(c)

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