



CONSOLIDATED ANNUAL  
PERFORMANCE &  
EVALUATION REPORT  
(CAPER)



COMMUNITY DEVELOPMENT BLOCK GRANT  
FISCAL YEAR 2018 CAPER

The CAPER covers progress in carrying out the City's Fiscal Year 2018 Annual Action Plan for the use of Program Year 2017 Community Development Block Grant Funds.

**Erica Haugen**

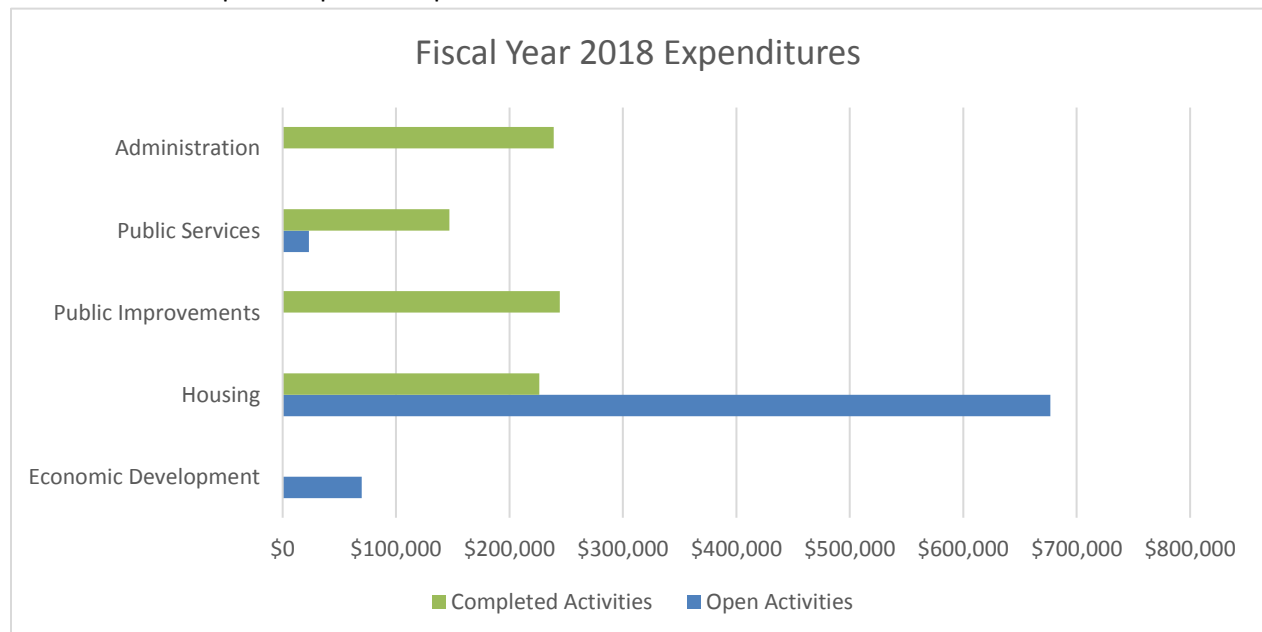
Housing & Community Development Department

## CR-05 - Goals and Outcomes

Progress the jurisdiction has made in carrying out its strategic plan and its action plan.  
91.520(a)

The Consolidated Annual Performance and Evaluation Report (CAPER) provides an end-of-year performance report of federally-funded activities and accomplishments to the U.S. Department of Housing and Urban Development (HUD) and the community. The City of Dubuque Consolidated Plan Year 3 CAPER covers the City's progress in carrying out the Fiscal Year (FY) 2018 Annual Action Plan for the use of HUD Program Year 2017 Community Development Block Grant (CDBG) funds. This CAPER covers the period of July 1, 2017 through June 30, 2018. The City of Dubuque is an entitlement City and is eligible to receive CDBG funds on an annual basis. The CAPER focuses on federally funded activities. When appropriate, this report provides information on activities supported by local and federal funds.

The City of Dubuque expended \$1,477,335.94 in entitlement and \$148,978.54 in lump sum for a total expenditure of \$1,626,314 CDBG in FY 2018. The City, the City of Dubuque Community Development Advisory Commission, local not-for profit organizations and neighborhood associations partner to implement programs delivered with the funds. In FY 18, CDBG funds were used to make investments in economic development, public infrastructure, housing rehabilitation, and neighborhood and public services for seniors, the homeless, children and youth, and recreation activities. All funds were used to meet the priority housing, economic development, neighborhood, and administration needs identified in the Consolidated Plan and Annual Action Plan for FY 2018 as amended. The City met the timeliness target for expenditure of CDBG funds as set by HUD for May 1, 2017. To ensure timely use of CDBG funds, the City of Dubuque established lump-sum agreement with American Bank and Trust in FY 2017. The lump-sum agreement allows the City to draw a single, large sum of funding to conduct housing rehabilitation activities. The lump-sum account was established on April 25, 2017 in the amount of \$305,363. The FY 2018 expenses include \$148,978.54 lump sum expenses. The remaining lump sum balance will be expended prior to April 2019.



*Obligations Under Voluntary Compliance Agreement (VCA)*

The City of Dubuque, Iowa and the U.S. Department of Housing & Urban Development (HUD) entered into a Voluntary Compliance Agreement (VCA) effective March 31, 2014 to resolve the findings detailed in a June 2013 Letter of Findings to the City of Dubuque. The Letter of Findings was issued after a 2011 civil rights related program review of the City's Housing & Community Development Department. HUD found the City was in noncompliance with Title VI of the Civil Rights Act in the administration of its Section 8 Program. HUD sought voluntary resolution to the findings and agreed to a Voluntary Compliance Agreement with the City of Dubuque. The agreement is effective for seven years and outlines corrective measures for the City's reporting, recordkeeping, and objectives during the term of the agreement. The CDBG Annual Action Plan for FY18 includes objectives to address the diminished availability of affordable housing, affirmatively further fair housing, and address the allegations and findings in the Letter of Findings (LOF) from HUD to reduce the negative effects of the findings.

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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.

Final accomplishments for FY 2018 are still being calculated. Accomplishment reporting will be adjusted to account for final quarter reports.

Goal	Outcome Indicator	Outcome Unit of Measure	Outcome Expected - Strategic Plan	Outcome Actual - Strategic Plan	Percent Complete	Outcome Expected - Program Year	Outcome Actual - Program Year	Percent Complete
Direct Homeownership Assistance	Direct Financial Assistance to Homebuyers	Households Assisted	40	3	7.50%	12	8	66.67%
Maintain Affordable Owner-occupied Housing	Homeowner Housing Rehabilitated	Household Housing Unit	55	9	16.36%	11	8	72.73%
Preserve Existing Housing through Code Enforcement	Housing Code Enforcement/Foreclosed Property Care	Household Housing Unit	2000	0	0.00%	300	450	150.00%
Preserve and Maintain Existing Affordable Housing	Rental units rehabilitated	Household Housing Unit	0	1		2	1	50.00%
	Homeowner Housing	Household	1	16		8	16	200.00%

	Rehabilitated	Housing Unit			1,600.00%			
	Other	Other	1	0	0.00%			
Maintain Affordable Rental Housing through Rehab	Rental units rehabilitated	Household Housing Unit	40	0	0.00%	10	0	0.00%
	Homeowner Housing Rehabilitated	Household Housing Unit	0	0		0	0	
Preserve Historical Housing & Neighborhoods	Homeowner Housing Rehabilitated	Household Housing Unit	2	0	0.00%	2	1	50.00%
Preserve Character and Assets of Neighborhoods	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	8000	0	0.00%	2000	*	
Increase Economic Opportunities	Facade treatment/business building rehabilitation	Business	0	0		0	0	
	Jobs created/retained	Jobs	14	0	0.00%			

	Businesses assisted	Businesses Assisted	0	2		5	2	40.00%
Encourage Workforce Development	Businesses assisted	Businesses Assisted	10	0	0.00%			
Improve Infrastructure and Accessibility	Other	Other	16	0	0.00%	12	10	83.33%
Neighborhood Infrastructure Improvements	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	Persons Assisted	0	12842		10	12842	128420.00%
	Public Facility or Infrastructure Activities for Low/Moderate Income Housing Benefit	Households Assisted	28	0	0.00%	10	0	0.00%
	Other	Other	9	0	0.00%			
Provide Neighborhood Recreation Activities	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	22920	123	0.54%	5730	123*	
Support Youth Education/Training	Public service activities other than	Persons	15	12		10	12	120.00%

Programs	Low/Moderate Income Housing Benefit	Assisted			80.00%			
Independent Lifestyles for Special Populations	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	2400	0	0.00%	600	*	
Provide Local Resources for Neighborhood and Home	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	1800	0	0.00%	450	*	
Provide Support for Social and Human Service Needs	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	0	0		400	0	0.00%
	Public service activities for Low/Moderate Income Housing Benefit	Households Assisted	185	0	0.00%			
Preserve Housing by Zoning Inspection/Enforcement	Housing Code Enforcement/Foreclosed Property Care	Household Housing Unit	225	103	45.78%	45	103	228.89%
Administrative Assistance for Neighborhood Develop	Other	Other	1	0	0.00%	1	1	100.00%

Housing Administration	Other	Other	1	0	0.00%	1	1	100.00%
CDBG Administration	CDBG: \$	Other	Other	1	0	0.00%	1	0

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

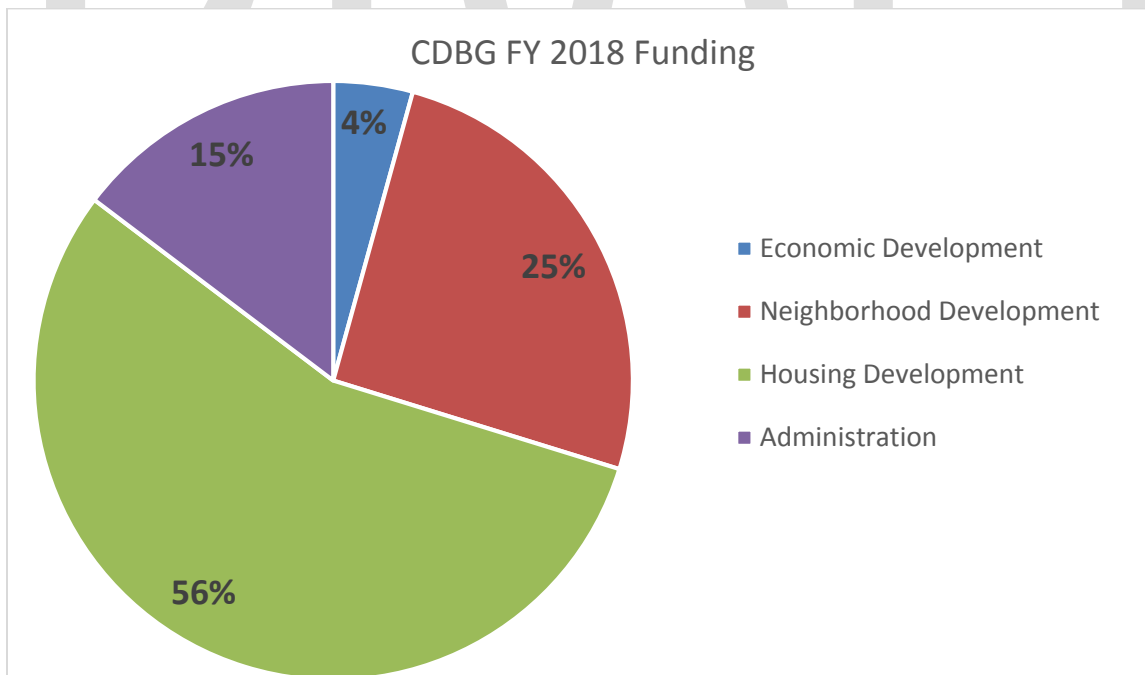
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Assess how the jurisdiction’s use of funds, particularly CDBG, addresses the priorities and specific objectives identified in the plan, giving special attention to the highest priority activities identified.

CDBG funds were used to address the priorities, needs, and goals identified in the Consolidated Plan. The proposed budget for the FY 2018 Annual Action Plan was adopted into the City Budget by the Dubuque City Council.

The City’s 23 goals described in the Consolidated Plan are all high priority and were used as the basis for the budgetary priorities outlined in the FY18 Annual Action Plan. Each funded activity must demonstrate it helps achieve a goal identified in the Consolidated Plan and benefit low/moderate-income (LMI) persons and communities before it is recommended for approval. The City provides funding for some public service activities through a yearly grant process. When preparing the Consolidated Plan, estimates are used to project the level of funding and the number of persons or households to be served. Due to the varying nature and cost of administering different programs, estimating the cost and number to be served for public service activities can be very challenging. For example, job training activities have different costs, space, and time requirements than programs providing emergency shelter. The City distinguishes between four areas of program development: Housing Development, Economic Development, Neighborhood and Community Development, and Planning and Administration. Fiscal Year 2018 activities addressed 19 of the goals identified in the Consolidated Plan.



The goals for Housing Development were: Direct Homeownership assistance; Maintain affordable

owner-occupied housing; Preserve existing housing through code enforcement; Preserve and maintain existing affordable housing; Maintain affordable rental housing through rehabilitation; and, Preserve historical housing and neighborhoods.

Goal	Activities	Measurement	Fiscal Year 2018 Goal	Accomplishment
Direct Homeownership Assistance	First Time Homebuyer Program	Households	10	8
Maintain Affordable Owner-occupied Housing	Homeowner Rehab Program	Households	11	8
Preserve Existing Housing through Code Enforcement	Code Enforcement	Housing Units no longer substandard	400	450
Maintain Affordable Rental Housing through Rehabilitation	Rental Rehabilitation	Households	10	0
Preserve Historical Housing & Neighborhoods	Historic Rehabilitation Loan Program	Households	2	1
Preserve & Maintain Existing Affordable Housing	Rehab Services and Staff	Direct Homeowner Ast.	8	15
		Rehabilitation Ast		8
	Lead Hazard Control	Rental Households	2	1

Housing Development activities made progress towards 5 of the 6 Consolidated Plan strategic goals. Housing Code Enforcement exceeded inspection goals and Housing Rehab Services and Lead Hazard Control Staff exceeded goals to preserve and maintain existing affordable housing.

The goals for economic development were to increase economic opportunities by providing loans to income-eligible small business owners. The microenterprise economic development activity provided loans for two small businesses.

Goal	Activities	Measurement	Fiscal Year 2018 Goal	Accomplishment
Increase Economic Opportunities	Microenterprise Assistance	Businesses Assisted	5	2

Goals for Neighborhood Development included: Preserve character and assets of neighborhoods; Improve infrastructure and accessibility; Neighborhood infrastructure improvements; Provide neighborhood recreation activities; Support youth education/training programs; Independent lifestyles for special populations; Provide local resources for neighborhood and home; Provide support for social

and human service needs; Preserve housing by zoning inspection/enforcement. An \* indicates final numbers are being calculated.

Goal	Activities	Measurement	Fiscal Year 2018 Goal	Accomplishment
Preserve Character and Assets of Neighborhoods	Neighborhood Grants	Persons Assisted	2000	8,905*
Improve Infrastructure and Accessibility	Accessible Curb Ramps	Other (ramps installed)	12	0
Neighborhood Infrastructure Improvements	Sidewalk Assistance	People	7	10
	Street Overlays	Persons	10	12,842
Provide Neighborhood Recreation Activities	Neighborhood Rec Programs	People	5730	6,290*
Support Youth Education/Training Program	Four Mounds HEART	People	10	12
Independent Lifestyles for Special Populations	Hills & Dales Senior Center	People	600	*
Provide Local Resources for Neighborhood and Home	Washington Tool Library	People	450	*
Provide Support for Social and Human Service Needs	Purchase of Services	People	400	0
Preserve Housing by Zoning Inspection/Enforcement	Zoning Enforcement	Household	45	103

\*Preserve Character and Assets of Neighborhoods: 8,905 is the estimated number of low/mod persons and represents 63.77% of the population that benefit from this activity on an area basis. The population of the area served is 13,965.

\*Provide Neighborhood Recreation Activities: 6,290 is the estimated number of low/mod persons and represents 71.44% of the population that benefited from this activity on an area basis. The population of the area served is 8,805.

All neighborhood Development programs subject to the Public Service Cap (15% of allocation plus previous year's program income) made progress towards goals. The service area and benefiting residents for neighborhood grants represents about 13,965 persons. Neighborhood recreation services were offered at a number of schools and parks located within low-and moderate-income residential

areas. The service area includes an estimated 8,805 residents that benefit from or have access to these low/mod residential neighborhood-enhancing services. Neighborhood infrastructure projects included 10 households assisted with replacement of sub-standard privately-owned sidewalks in the public right-of-way. The City continues working with the local utility company to identify street lights suitable for upgrade to LED lighting in target neighborhood. Planning with the utility company and the street light inventory delayed implementation of this project until. The Curb Ramp project is on hold due to staff turnover in the department. Street overlays reached over 12,800 households with improved access to usable roads and infrastructure in low and moderate-income areas.

Administrative programing continued to work towards the goals for: Housing administration; CDBG Administration; and, assistance for neighborhood development. Administration positions work towards timely and correct use of funds and that the City of Dubuque does not engage in any actions that would hinder the implementation of the consolidated Plan, nor engage in willful inaction which would result in failure to implement the current adopted Consolidated Plan.

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## 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)

	Persons	Households
White	2,181	68
Black or African American	236	39
Asian	17	2
American Indian or American Native	4	1
Native Hawaiian or Other Pacific Islander	6	
American Indian or American Native & White	5	
Black or African American and White	89	2
Asian & White	4	
American Indian or American Native and Black	2	
Other Multi Racial	58	1
Total	1788	
Hispanic	36	0

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

### Narrative

A small number of programs final quarter reports are being gathered. The total persons and households will be adjusted when the reports become available.

The City of Dubuque is a member of the Government Alliance on Race and Equity (GARE), a national network working to achieve racial equality and advance opportunities for all. Through this work, the City is working to address opportunities for inclusion and sustainable systemic institutional change. Beginning in FY 18, the City is taking intentional steps to ensure partners have

Table 2 in section CR-10 is generated by the HUD CAPER template and reflects demographic information provided by persons and households upon intake into a CDBG funded program.

CDBG beneficiaries by race are generally representative of the population of a whole in Dubuque. The City has identified non-majority populations and the very-low income as disproportionately impacted by housing problems and poverty. The use of CDBG funded programs by these groups is slightly higher for public service activities. The City's Analysis of impediments identified a small number of minority homeowners in Dubuque. To better serve these populations, the City will introduce a rental rehabilitation program in FY 2019 and adopt a tiered housing inspection schedule that will allocate resources to improve the condition of the affordable housing in the community.

Hispanic ethnicity represents 1.38% of those assisted compared to about 2.66% of the population of Dubuque. This is consistent with participation from the previous year; however, there is increasing diversity in the race of those with Hispanic ethnicity. Eighty-nine participants receiving CDBG funded services were also receiving rental assistance through the City’s Housing Choice Voucher, or Section 8 program. This represents about 5.05% of those who directly benefitted from CDBG funded services. Race by housing program from participation records is included in the appendix.

CDBG Beneficiaries by Race, Ethnicity, and Housing Choice Voucher (HCV)	Total	Hispanic	HCV Household
White	83.81%	69%	*
Black or African American	10.27%	0%	*
American Indian or Alaska Native	0.11%	0%	*
Asian	0.45%	0%	*
Native Hawaiian or Other Pacific Islander	0.28%	0%	*
Other Multi Racial	2.62%	14%	*
American Indian or Alaskan Native & White	0.17%	0%	*
Black or African American & White	2.18%	17%	*
American Indian or Alaskan Native & Black	0.11%	0%	*

2012-2016 American Community Survey 5-Year Estimates	Estimate	Margin of Error	%
Total:	58,535	+/-67	
Population of one race:	56,981	+/-390	97.35%
White	53,089	+/-365	90.70%
Black or African American	2,380	+/-266	4.07%
American Indian and Alaska Native	45	+/-32	0.08%
Asian alone	877	+/-156	1.50%
Native Hawaiian and Other Pacific Islander	338	+/-20	0.58%
Some other race	252	+/-175	0.43%
Population of two or more races:	1,554	+/-375	2.65%
Two races including Some other race	43	+/-36	0.07%
Two races excluding Some other race, and three or more races	1,511	+/-384	2.58%
Population of two races:	1,374	+/-293	2.35%
White; Black or African American	717	+/-248	1.22%
White; American Indian and Alaska Native	372	+/-109	0.64%
White; Asian	152	+/-84	0.26%
Black or African American; American Indian and Alaska Native	56	+/-61	0.10%
All other two race combinations	77	+/-43	0.13%
Population of three races	180	+/-181	0.31%
Population of four or more races	0	+/-22	0.00%

## 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	2,831,082	1,112,257
HOME	HOME		
HOPWA	HOPWA		
ESG	ESG		
GD Tif	GD Tif		50,000
IFA	IFA		14,450
LHAP	LHAP		0
Other	City Water & Engineering		32,371

Table 3 - Resources Made Available

### Narrative

The CDBG resources available in FY 2018 include program income received and carryover funds. During FY 2018, the City expended \$382,773 in program income, \$148,979 in lump sum, and \$1,477,336 in entitlement funds for a total of \$1,626,314. Funding was used to support housing, neighborhood and community development, and administrative programs. Housing Rehabilitation Services and Staff expended \$110,888 in non-CDBG funds to support homeownership and housing rehabilitation activities.

Identify the geographic distribution and location of investments

Target Area	Planned Percentage of Allocation	Actual Percentage of Allocation	Narrative Description
City Wide	81	79.9%	79.9% of funds were used for activities available on a city-wide basis
Low/Moderate Area Benefit	19	10.87%	20.1% of expenditures were dedicated exclusively to low- and moderate-income areas.

Table 4 – Identify the geographic distribution and location of investments

### Narrative

The annual action plan did not identify target areas for the geographic distribution of funds; however, activities targeting LMI populations were conducted in residential areas with greater than or equal to 51% low/mod income residents. Census Tracts 1,3,4,5,6,7.01, 7.02,9,11.01, 11.02, 12.01, 101.01 and 101.03. A listing of activities and their locations is found in the attached PR-03 CDBG Activity Summary Report. A map of the low and moderate residential areas is attached.

## 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	1,075	0
Number of Non-Homeless households to be provided affordable housing units	12	19
Number of Special-Needs households to be provided affordable housing units	0	0
Total	1087	17

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	26	40
Number of households supported through Acquisition of Existing Units	1	0
Total	27	40

Table 6 – Number of Households Supported

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

Discuss how these outcomes will impact future annual action plans.

Affordable housing options continue to be limited within the City, and often restricted to certain geographic areas. The CDBG down payment assistance is often not enough to reduce the price of the home enough to be affordable to low and moderate-income buyers. The City is exploring ways to partner with developers to create new, affordable homeownership opportunities outside of areas of high poverty concentration. The City's goals to increase income diversity in neighborhoods has a need for additional funding and programming designed to support these efforts.

Include the number of extremely low-income, low-income, and moderate-income persons



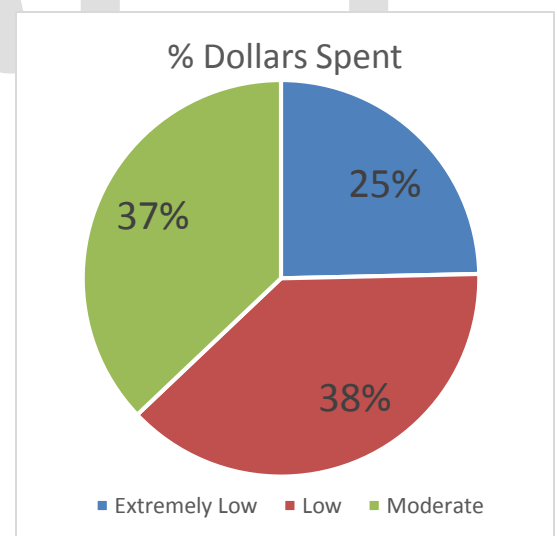
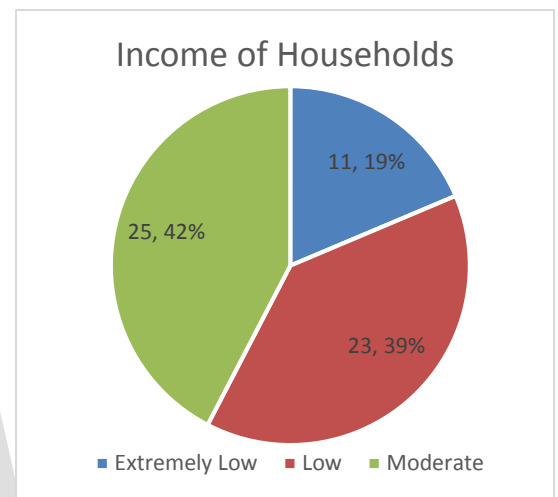
served by each activity where information on income by family size is required to determine the eligibility of the housing activity. CDBG provided direct and indirect assistance for 19 income eligible households through the homebuyer program and 30 households through home repair or rehabilitation activities, and 10 households through lead activities.

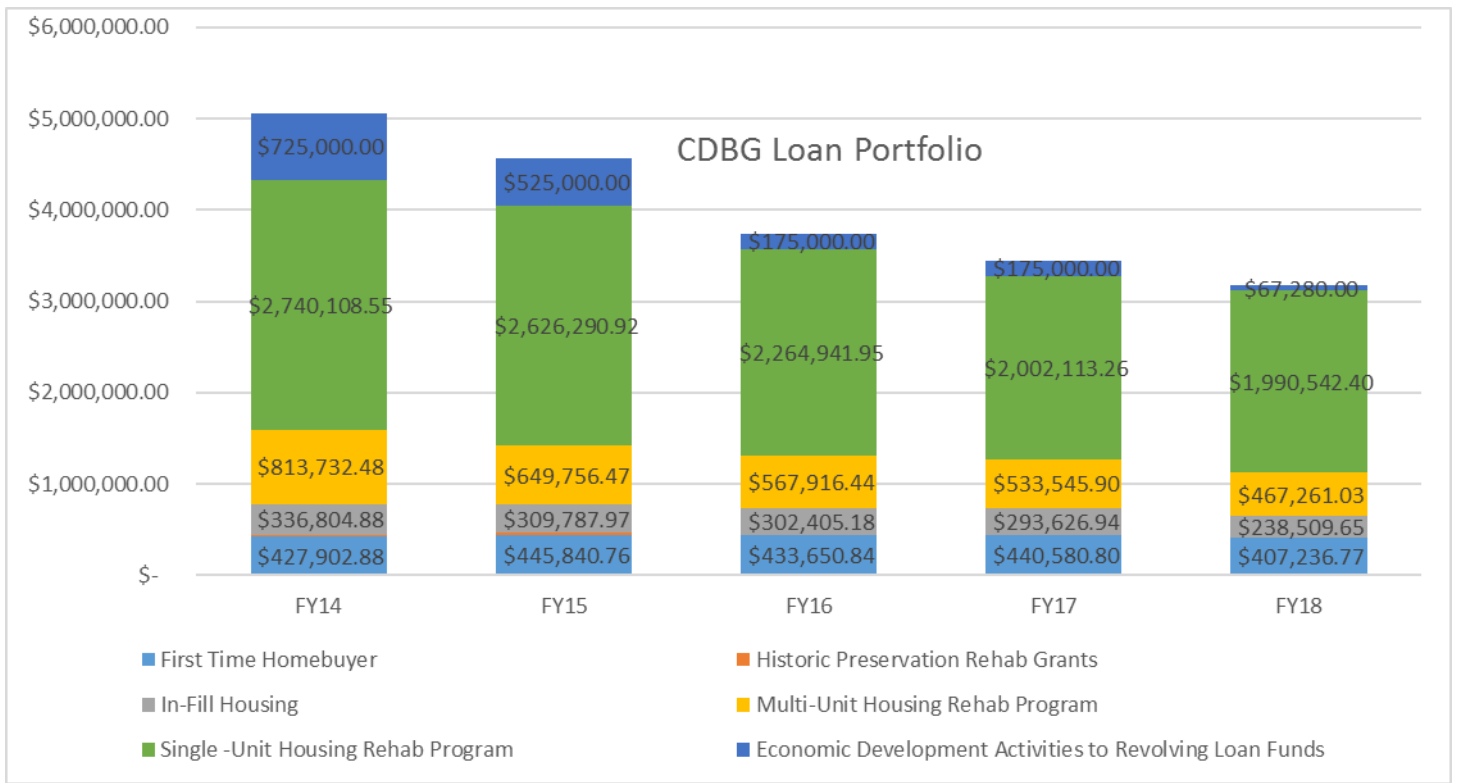
Number of Households Served	CDBG Actual	HOME Actual
Extremely Low-income	11	0
Low-income	23	0
Moderate-income	25	0
Total	59	0

Table 7 – Number of Households Served for housing activities

### Narrative Information

CDBG funds were used for eligible housing activities, such as homeowner repair and rehabilitation, lead hazard reduction, rental rehabilitation, rehabilitation services and staff costs, and direct financial assistance for homebuyers. The chart, Income of Households Receiving Housing Activities, represents households living in complete housing activities: Lead Hazard Reduction (10); Small & Large Homeowner Rehab (30). Income eligible households have access to additional financial assistance through the Housing Trust Fund, funded by IFA, and other local sources. The First-time Homeowner program partners with the City’s Section 8 Homeownership Program to provide housing counseling and financial assistance for voucher holders. The City encourages income diversity in neighborhoods by incentivizing purchase in low-mod areas for higher income households and providing additional financial resources for extremely-low, low, and moderate-income populations to increase affordability outside areas of high-poverty concentration. The addition of 19 households assisted with direct financial assistance to purchase a home brings the total number of households assisted to 59. 37% of resources expended for housing activities devoted to moderate income households, 38% to low income households, and 25% to low income households. By leveraging multiple sources of funding to increase resources for lower-income households, more equitable outcomes are achieved. Program income generated from CDBG funded housing activities represents nearly 98% of the City’s CDBG loan portfolio.





## 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

Dubuque is in the Balance of State for Iowa's Continuum of Care (CoC). Not-for-Profit service providers lead the coordination of services and housing for the homeless. The Community Development Specialist assists local Continuum of Care applicants with the environmental review process and determining consistency with the Consolidated Plan. Staff from Housing & Community development attend Continuum of Care meetings to assist in identifying and responding to the needs of homeless persons.

Addressing the emergency shelter and transitional housing needs of homeless persons

The City of Dubuque supports organizations providing human service activities through Purchase of Services Grants. Not-for-profit organizations meeting a human service need in the community can apply for CDBG and General Funds on an annual basis. In FY 2018, shelter services were not funded with CDBG resources. The City partners with local non-profits to deliver the Phoenix Housing program. Phoenix Housing provides permanent, supportive housing for homeless living with disabilities. Homeless outreach, emergency, transitional, permanent, and support services are coordinated with local providers. This is the City's only program serving the homeless using the housing first model for permanent supportive housing. City staff help verifying income and with inspections to ensure local, state, and federal housing quality standards are met. The City partners with local non-profit organizations to provide the support

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

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

A network of non-profit organizations provides a range of services from outreach to permanent

supportive housing. These organizations collaborated during the program year to define and align resources for coordinated entry. Headed by the Iowa Continuum of Care, a network of local providers is working to streamline services for homeless to allow better access to shelter, mental health, health, dental, and substance abuse resources. The primary focus is to find people shelter or housing immediately, in their community of choice. The City participates as the permanent supportive housing provider and partners with a local non-profit to coordinate outreach and manage the waiting list. The City continues to support requests to develop and rehabilitate accessible and affordable housing, with emphasis on programs willing to accept vouchers or provide subsidies for households under 30% AMI.

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

### Actions taken to address the needs of public housing

The City of Dubuque does not have public housing. The City monitors the number of affordable tax credit units and Section 8 units within the City. The affordable housing stock is not high enough to meet needs of renters and homeowners at or below 80% of the area median income. This is supported by data in the Consolidated Plan showing more renters earning under 80% Area Median Income are cost burdened, meaning they pay more than 30% of their income for housing-related costs. The American Community Survey estimates verify nearly half of all renter's experience cost burden.

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

The City uses the Section 8 Housing Choice Voucher program to provide affordable housing options. The Housing & Community Development Department is the PHA for the City. The City has 1,072 vouchers but is unable to issue to capacity due to budgetary constraints. The City works with the PHA to ensure leasing to 95% of the budget capacity. The Rehabilitation Supervisor at Housing & Community Development works with Family Self-Sufficiency and Circles participants to increase awareness about homeownership options.

All Housing Choice Voucher participants are invited to join the City's Family Self-Sufficiency (FSS) and Circles programs. These programs offer unique, person-centered coaching to support the individual's needs. Goal planning, resource coordination, job readiness, and family supports are all provided. The Rehabilitation Supervisor regularly visits with Family Self-Sufficiency caseworkers and Circles and FSS participating families. The programs coordinate resources to help buyers establish bank accounts, Individual Development Accounts (IDA's), homeownership counseling, and resources to purchase a home. The chart below shows activities that also reported serving participants from HCV households.

Source of Funding	Total Households Assisted	Total Amount of Assistance	HCV Households Assisted	Amount or approximate amount of Assistance provided to HCV Households
CDBG First Time Homebuyer	8	\$40,000	0	0
Housing Trust Fund First Time Homebuyers	13	\$232,643	1	\$20,000
Senior Center	* (elderly individuals)	\$13,650	48	\$*
Neighborhood Recreation Programs (LMC)	123*	\$73,298	*6,290	\$*

Actions taken to provide assistance to troubled PHAs

The PHA is not troubled.

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## 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's Planning & Zoning, Economic Development, and Housing Departments coordinate to receive and process requests for development of affordable housing. The Housing & Community Development Department works closely with the City's Legal and Human Rights Departments to inform City staff, housing providers, developers, and the community at large about the barriers to fair housing and the strategic steps the City is taking to eliminate barriers as identified in the Analysis of Impediments. To encourage public support for affordable housing development, the City partners with organizations wishing to develop affordable housing to engage neighborhood residents about the proposed projects. Through a series of informational meetings, housing developers and residents can discuss the community needs, obtain facts about the need for affordable housing, and identify target populations and needs unique to the proposed location within the Dubuque community. These meetings have proven successful for developers proposing Low Income Housing Tax Credit projects.

To help with the financial feasibility of these projects, the City offers developers the opportunity to request support from the City for the project. If the project aligns with the City's goals, Consolidated Plan, and Comprehensive Plan, the City facilitates a public engagement process where incentives for the project are presented to City Council. Projects seeking support must apply to the City for a review and the City Council makes final recommendations.

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

The City applied for the Lead Hazard Control Grant and in November 2015 was awarded \$325,000 in Healthy Home funds and \$2,905,815 in lead hazard control funds for a total of \$3,230,815. The program has a local match of \$200,466 and proposes to do 129 units in the three-year grant period. The Lead and Healthy Homes Program effectively delivers successful lead remediation activities for income eligible households. The grant provides additional funds to address health and safety hazards in the home, and coordinates with a Home Advocate to build social capacity for participating families.

All CDBG funded activities use the required level of lead assessment when performing rehab on homes. Homeowners and renters are provided information and resources about lead and lead poisoning, as well as information on where and when children should be tested. Code enforcement activities identify visible hazards from peeling paint and housing code to ensure the health and wellbeing of children living in these units. CDBG funding provided financial assistance for 10 units assisted by the Lead & Healthy Homes program during the program year.

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

The City of Dubuque funds, supports, and participates in a variety of projects that support the Consolidated Plan goals to increase economic opportunities through business retention, expansion, job creation, and financial resources for low- and moderate-income small business owners. The City continues to participate in Project HOPE (Helping Our People Excel) to coordinate service providers, employers, and job seekers to fill the employment needs of the community. The City of Dubuque has a low employment rate and many of the local manufactures have a demand for skilled workers. Project HOPE coordinates with Dubuque Works, Opportunity Dubuque, and the local community college, NICC, to identify under-skilled workers, train them up, and match them with employment opportunities.

The City has also taken significant strides in the areas of equity and inclusion. Working with Inclusive Dubuque, the City completed an Equity Profile focused on identifying needs of various populations. The equity profile for housing demonstrated many of the lowest income households experience the most severe housing problems, and those problems disproportionately impact renters. Much of the City's historic housing stock is in the downtown. Several units are in mixed-use structures, with vacant store fronts on the first floor and deteriorated housing on the upper floors. The City is working to develop a rental rehabilitation program to address the poor housing conditions in this area, in conjunction with efforts to revitalize owner occupied, local business, and infrastructure in the Central Avenue Corridor.

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

Within the institution, steps are being taken to encourage and promote high-performing, fiscally responsible government. This outcome-driven process is focused on data analysis, community engagement, and strategic initiatives designed to support and retain Dubuque's population. Employers in Dubuque are looking for a skilled workforce, and the Housing & Community Development Department has strategically partnered with the private sector to connect unemployed and underemployed populations to training and skills necessary to meet local employer's needs.

During the program year, the City began compiling a data library and developing uniform data collection and tracking systems across departments to more effectively address neighborhood, housing, and economic development concerns identified by citizens and staff. The work being done focuses on equity and identifying how the institution can provide more equitable services.

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

The City has developed strategies to ensure housing developers relate to the community in which they plan to provide housing, as well as local service providers. Programs seeking City support must demonstrate active public engagement in the planning of the project and what support services will be available to residents. Locations of projects are carefully considered to ensure occupants will have access to areas of opportunity relevant to the target population being served. The City actively seeks



out federal, state, local, and private sector partners that can meet the range of housing needs across the community.

The City launched the C.H.A.N.G.E. program (Comprehensive Housing Activities for Neighborhood Growth and Enrichment) to identify and rehabilitate downtown housing units. The program is designed to acquire, rehab, and sell vacant and abandoned properties to income eligible households, coordinate local, state, and federal resources to have the greatest impact for occupied properties, and support neighborhood and community development to ensure rich partnerships, programs, and economic and social resiliency. Through a partnership with Community Housing Initiatives, multiple single-family homes in the Washington Neighborhood have been rehabilitated into affordable homeownership opportunities.

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's 2016-2020 Analysis of Impediments to Fair Housing Choice (AI) was updated as a requirement of the Voluntary Compliance Agreement with HUD. The AI identifies several actions the City has taken to reduce discrimination based on: race, color, national origin, religion, sex, familial status, disability, sexual orientation, age, and other arbitrary factors.

The AI identified "source of income" as an arbitrary factor unrelated to a person's ability to be a good tenant and recommended the Human Rights commission consider include source of income as a protected class. The Housing & Community Development, Human Rights, and Planning Services Departments partnered with local stakeholders to better understand how source of income impacts tenants, particularly Housing Choice Voucher holders. The AI identified a limited number of housing providers participating in the voucher program. To address this, the "Source of Income" committee was formed. The Committee was made up of key city staff, board and commission members, housing providers, and housing advocacy groups. The group analyzed data, information, and organized a series of community dialogues to gain insight into the issues surrounding the impact of such an ordinance and other options to increase housing choice for voucher holders.

To address housing discrimination, the City took steps to increase staff understanding of fair housing, discrimination, and the history of racism in the community. Fair housing training was completed in September, in accordance with the VCA. Staff from multiple City Departments, including Police Department Staff, attended the training Fair housing training was also provided to specific departments and organizations serving the public with housing needs. New employees, board and commission members receive fair housing training and education within 30 days of beginning service.

The City of Dubuque made progress in the following actions in FY 2018:

- **July 2017**

- 7/28/17 Police Chief memo describing success of community resource officer (CRO) pipeline program as it relates to diversifying the police force. Between 2011 and 2016 a total of 14 CROs have been hired into full time positions – 11 white, 2 Black, 1 Hispanic Latino. Three of the hires are female.

- **September 2017**

- Fair Housing Training Session, September 6, 2017
- Fair Housing Training Sessions (2), September 11, 2017
- Fair Housing Training Sessions (2), September 12, 2017
- Fair Housing Training Sessions (2), September 20, 2017
- Fair Housing Training Sessions (2), September 21, 2017
- Fair Housing Training Session, September 23, 2017
- Revisions to Administrative Plan on Applications, Waiting List and Tenant Selection (Chapter 4) and Program Administration (Chapter 16) submitted to HUD for approval, September 25, 2017

- **October 2017**

- Intercultural & Equity Workshop #1 with City Staff (2), October 18, 2017

- **November 2017**

- Intercultural and Equity Workshop #2 with City Staff (2), November 1, 2017
- Intercultural and Equity Workshop #3 with City Staff (2), November 15, 2017
- Iowa Civil Rights Commission filed complaint #1 on fair housing disability test results from Dubuque, November 16, 2017

- **December 2017**

- Iowa Civil Rights Commission filed complaints #2, #3, and #4 on fair housing disability test results from Dubuque, December 7, 2017  
News Release Issued for Notification of Housing Choice Voucher Waiting List Opening, December 8, 2017

- **January 2018**

- Notification of Housing Choice Voucher Waiting List Opening sent to Outreach Organizations, January 3, 2018
- Public Notification of Housing Choice Voucher Waiting List Opening Published, January 9, 2018

- **February 2018**

- Housing Choice Voucher Waiting List opened at 8:00 am on February 14, 2018 and closed at 5:00 pm on February 20, 2018. City of Dubuque received 1545 applications during that time.

- **March 2018**

- City staff presented 2018 SOI Progress Report to the City Council on March 5, 2018.
- Resident Advisory Board reviewed proposed revision to Administrative Plan on Applications, Waiting List and Tenant Selection (Chapter 4) and Program Administration (Chapter 16) on March 21, 2018. No input was received.
- Housing Commission approves revisions to Administrative Plan on Applications, Waiting List and Tenant Selection (Chapter 4) and Program Administration (Chapter 16), March 27, 2018.

- **May 2018**

- City Council approves revisions to Administrative Plan on Applications, Waiting List and Tenant Selection (Chapter 4) and Program Administration (Chapter 16).
- Public Hearing on FY2018 PHA Annual Plan held on May 22, 2018. No public input was received. PHA Annual Plan was approved by Housing Commission.
- Delivered Workshop *Developing an Equity Framework via Intercultural Methods*

- **June 2018**

- City staff began planning for fall 2018 staff Fair Housing training

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

In March 2018, the responsibility for monitoring the CDBG programs was transferred from the Housing & Community Development Department to the Budget Department. Department Managers administering CDBG funded activities are still responsible for monitoring and oversight in their representative areas. The Community Development Specialist provides technical assistance and

coordinates with department directors to ensure compliance with CDBG regulations.

Pre-funding Preparedness: The Department shifted from offering semi-annual trainings to offering one-on-one preparatory and program development meetings for new or expanded programs offered through the City of Dubuque. Technical assistance is provided to develop programs that deliver eligible activities in a timely manner. Most city departments have limited staff familiar with CDBG program delivery and this has led to a delay in spending as departments work to train employees. New sub-recipients outside of the City are provided one-on-one technical support prior to project implementation ensure contracting, eligibility, reporting, and national objective requirements are met.

1. **Contract Management:** Most CDBG contracts are overseen by the Housing & Community Development Department and the Budget Department, but some are assigned to a City project manager responsible for the execution and reporting related to the contract. Contracts include HUD, state, and local requirements, including related requirements such as environmental reviews, URA, 2 CFR 200, and Lead Based Paint requirements. Ongoing technical assistance is provided to sub recipients and project managers throughout the contract period. Most sub recipients do monthly draws where supporting documentation is verified.
2. **Monitoring Compliance:** The City completes monthly “desk audits” of reports and supporting documentation, onsite monitoring reviews, phone contacts, written communications (letters and email) and meetings. Each sub recipient has individualized reporting forms unique to their program, budgeted expenses, and activities. These individualized reporting forms allows for convenient management and monitoring for fraud, waste, mismanagement and other opportunities for potential abuse. Contract provisions allow for suspension of payment or termination of contract and reimbursement at any time during the program year based on performance deficiencies. Staff always works with sub recipients to correct identified deficiencies through discussion, technical assistance prior to imposing any sanctions. Sub recipients report on successes, challenges, and needs quarterly. City Departments using CDBG funds are monitored by their respective Department Managers.
3. **Audit Review:** Sub recipients are required to submit an audit prior to funding (if available) and as part of the year-end requirements in the contract. Programs requiring a Single Audit are subject to a financial desk review to the CDBG program if there is a finding noted in the audit, regardless if the finding is related to CDBG funds.

The City’s Finance Office began tracking minority and women owned businesses in FY 16. The Housing and Community Development department maintains and updates the Section 3 plan for applicable contracts.

#### 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 Community Development Advisory Commission meets monthly and is open to the public. Meetings are at 5:30 pm in the Housing Conference Room, located in Dubuque's downtown on a bus route. The meetings last about an hour. The Community Development Advisory Commission reviews the Citizen Participation Plan annually at the July meeting. Agendas are posted in the Housing Department, City Hall, and distributed to a list serve anyone can register Agendas and reports are posted online. The commission provides citizens an opportunity to comment on proposed plans, performance, and reports. Comments can also be submitted in writing, by phone, or electronically through the City's website. The Citizen Participation Plan describes the roles, responsibilities, and contact information of entities involved in administering, reviewing, and approving activities included in this report.

Public comments on the CAPER will be provided as an attachment when they become available.

### 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 amends the Annual Action Plan as necessary to adjust for financial resources and fluctuations in program income. The Citizen Participation Plan defines substantial and non-substantial amendments. Substantial amendments require a 30-day comment period, review by the Community Development Advisory Commission, and adoption by City Council. The first amendment to the plan was a substantial amendment allocating unspent funds from prior years to new and existing programming. It was approved by City Council after the required comment period and Community Development Advisory Commission recommendation.

The Community Development Specialist met with Department Managers for low-spending activities to review timely use of funds. Programs will be provided spending and performance benchmarks, as recommended in the HUD monitoring for the CDBG program administration. Additional funds would be allocated to high-performing programs with projects ready for completion.

## 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 amends the Annual Action Plan as necessary to adjust for financial resources and fluctuations in program income. The FY18 Action Plan amendments were designed to allocate resources to programs and activities that could effectively and efficiently deliver the funding. The Plan was amended to carryover funds from the previous program year into the current program year. An additional need for funding for lead hazards was identified to help address the lead paint hazards in the larger, historic homes in Dubuque. Due to the historic nature of these homes, lead remediation activities can become costly. Lead poisoning often disproportionately impacts lower income households and the City is working to increase lead safe housing options for households with children present..

Technical assistance was provided to the Economic Development Department to develop and begin delivering the microeconomic loan program which successfully approved two applications. Coordination between the CDBG Specialist, located at the Housing Department, and the Economic Development Assistant was necessary to ensure an equitable application, loan evaluation, underwriting, and award process. To ensure timely use of funds, program allocations will be monitored for effective, timely use of funds moving forward. Programs will be provided spending and performance benchmarks. Additional funds would be allocated to high-performing programs with projects ready for completion.

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

No

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