

CR-05 - Goals and Outcomes

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

This could be an overview that includes major initiatives and highlights that were proposed and executed throughout the program year.

The 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 4 CAPER covers the City's progress in carrying out the Fiscal Year (FY) 2019 Annual Action Plan for the use of HUD Program Year 2018 Community Development Block Grant (CDBG) funds. This CAPER covers the period of July 1, 2018 through June 30, 2019. 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 \$1,335,350.15 in entitlement and \$139,592.02 in lump sum for a total expenditure of \$1,474,942.17 CDBG in FY 2019. 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 19, 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 2019 as amended. The City met the timeliness target for expenditure of CDBG funds as set by HUD for May 1, 2018. 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 included \$148,978.54 lump sum expenses and in FY 2019 the remaining \$156,384.46 was expended. The lump sum balance was expended by April 25th, 2019 as required, and the account was closed.

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 FY19 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. On April 10th, 2019 the Office of Fair Housing and Equal Opportunity recognized the City of Dubuque’s compliance with the Agreement thus far and modified the Agreement to reduce the administrative burden on the City by reducing the reporting requirements for the last two years of the Agreement.

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	Indicator	Unit of Measure	Expected – Strategic Plan	Actual – Strategic Plan	Percent Complete	Expected – Program Year	Actual – Program Year	Percent Complete
Administrative Assistance for Neighborhood Develop	Non-Housing Community Development	Other	Other	1	1	100.00%	1	1	100.00%
CDBG Administration	Non-Housing Community Development	Other	Other	1	1	100.00%	1	1	100.00%
Direct Homeownership Assistance	Affordable Housing	Direct Financial Assistance to Homebuyers	Households Assisted	40	36	90.00%	12	10	83.33%
Encourage Workforce Development	Non-Housing Community Development	Businesses assisted	Businesses Assisted	10	2	20.00%			

Housing Administration	Affordable Housing	Other	Other	1	1	100.00%	1	1	100.00%
Improve Infrastructure and Accessibility	Non-Housing Community Development	Other	Other	16	0	0.00%			
Increase Economic Opportunities	Non-Housing Community Development	Facade treatment/business building rehabilitation	Business	0	0				
Increase Economic Opportunities	Non-Housing Community Development	Jobs created/retained	Jobs	14	0	0.00%			
Increase Economic Opportunities	Non-Housing Community Development	Businesses assisted	Businesses Assisted	0	2		5	0	0.00%
Independent Lifestyles for Special Populations	Non-Homeless Special Needs	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	2400	645	26.88%	600	257	42.83%
Maintain Affordable Owneroccupied Housing	Affordable Housing	Homeowner Housing Rehabilitated	Household Housing Unit	55	28	50.91%	11	11	100.00%
Maintain Affordable Rental Housing through Rehab	Affordable Housing	Rental units rehabilitated	Household Housing Unit	40	0	0.00%	3	0	0.00%
Maintain Affordable Rental Housing through Rehab	Affordable Housing	Homeowner Housing Rehabilitated	Household Housing Unit	0	0				

Neighborhood Infrastructure Improvements	Non-Housing Community Development	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	Persons Assisted	0	12842		250	0	0.00%
Neighborhood Infrastructure Improvements	Non-Housing Community Development	Public Facility or Infrastructure Activities for Low/Moderate Income Housing Benefit	Households Assisted	28	12	42.86%	8	12	150.00%
Neighborhood Infrastructure Improvements	Non-Housing Community Development	Other	Other	9	0	0.00%			
Preserve and Maintain Existing Affordable Housing	Affordable Housing	Rental units rehabilitated	Household Housing Unit	0	1				
Preserve and Maintain Existing Affordable Housing	Affordable Housing	Homeowner Housing Rehabilitated	Household Housing Unit	1	22	2,200.00%	15	6	40.00%
Preserve and Maintain Existing Affordable Housing	Affordable Housing	Housing for Homeless added	Household Housing Unit	0	0				
Preserve and Maintain Existing Affordable Housing	Affordable Housing	Housing for People with HIV/AIDS added	Household Housing Unit	0	0				
Preserve and Maintain Existing Affordable Housing	Affordable Housing	Other	Other	1	1	100.00%	1	1	100.00%

Preserve Character and Assets of Neighborhoods	Non-Housing Community Development	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	Persons Assisted	0	0		635	0	0.00%
Preserve Character and Assets of Neighborhoods	Non-Housing Community Development	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	8000	0	0.00%	2000	0	0.00%
Preserve Existing Housing through Code Enforcement	Affordable Housing	Housing Code Enforcement/Foreclosed Property Care	Household Housing Unit	2000	1552	77.60%	350	513	146.57%
Preserve Historical Housing & Neighborhoods	Affordable Housing	Homeowner Housing Rehabilitated	Household Housing Unit	2	0	0.00%			
Preserve Housing by Zoning Inspection/Enforcement	Non-Housing Community Development	Housing Code Enforcement/Foreclosed Property Care	Household Housing Unit	225	263	116.89%	225	160	71.11%
Provide Local Resources for Neighborhood and Home	Non-Housing Community Development	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	1800	230	12.78%	1484	230	15.50%
Provide Neighborhood Recreation Activities	Non-Housing Community Development	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	22920	29128	127.09%	5730	5558	97.00%
Provide Support for Social and Human Service Needs	Non-Housing Community Development	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	0	0		185	0	0.00%

Provide Support for Social and Human Service Needs	Non-Housing Community Development	Public service activities for Low/Moderate Income Housing Benefit	Households Assisted	185	0	0.00%			
Support Youth Education/Training Programs	Non-Housing Community Development	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	15	31	206.67%	10	0	0.00%

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

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

CDBG funds were used to address the priorities, needs, and goals identified in the Consolidated Plan. The proposed budget for the FY 2019 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 FY19 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 2019 activities addressed all 23 of the goals identified in the Consolidated Plan.

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	562
Black or African American	84
Asian	0
American Indian or American Native	3
Native Hawaiian or Other Pacific Islander	12
Total	661
Hispanic	7
Not Hispanic	654

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

Narrative

Additional outreach for programs started in FY 2019 to residents that are underserved or under-represented in the families assisted above. This included specific outreach to the Pacific Islanders, NAACP Friends of Fair Housing, Dubuque Renters Union and the Transgender community, as well as outreach to non-profits serving minorities such as the Dream Center and the Fountain of Youth. This outreach has increased the number of participants that are non-white in the community, and further efforts are being explored for implementation in FY 2020 based on the positive results of outreach in FY 2019.

CR-15 - Resources and Investments 91.520(a)

Identify the resources made available

Source of Funds	Source	Resources Made Available	Amount Expended During Program Year
CDBG	public - federal	2,648,076	1,474,942

Table 3 - Resources Made Available

Narrative

The CDBG resources available in FY 2019 include program income received and carryover funds. During FY 2019, the City expended \$250,791 in program income, \$139,592.02 in lump sum, and \$1,079,559.58 in entitlement funds for a total of \$1,474,942.17. Funding was used to support housing, neighborhood and community development, and administrative programs.

Identify the geographic distribution and location of investments

Target Area	Planned Percentage of Allocation	Actual Percentage of Allocation	Narrative Description
City Wide	77	89.76	Activities available city-wide
Low/Moderate Area Benefit	23	10.24	Activities to serve only low & 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. 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. The area outlined was used from July 1st, 2018 through April 1, 2019 from 2006-2010 Census data and the shaded areas are the 2011-2015 Census data map that was utilized starting April 1, 2019 per CPD Notice 19-02.

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 Dubuque actively seeks out and leverages resources to meet goals identified in the consolidated plan. Partnerships with local organizations working to provide additional affordable housing, economic development, socioeconomic, and self-sufficiency resources ensure investments have lasting impact. Leveraged funds are detailed below.

Total FY 2019 Expenditures

CDBG Entitlement Expenditures \$ 1,474,942.17

Other Funds

Section 8 rental Assistance \$ 5,637,576

Gaining Opportunities (Self-sufficiency programing) \$ 134,518

Healthy Homes Home Advocate \$ 142,761

IFA Housing Trust \$ 104,267

General Funds \$ 486,683

True North Partnership \$150,000

Operation New View Partnership \$25,000

Community Housing Initiatives Partnership \$ 175,000

Shelter Plus Care \$ 111,803

Neighborhood Revitalization \$ 46,145

Total other funds expended in FY 2019 \$ 7,013,753

Leveraging rate of non-formula funds for every \$1 in formula funds: \$ 4.75

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 11 – 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	37	12
Number of households supported through Acquisition of Existing Units	1	5
Total	38	17

Table 12 – Number of Households Supported

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

A new partnership was formed with True North to acquire and rehabilitate existing housing units and make them available to low/mod income households was formed in 2018. The City of Dubuque assisted True North in acquiring 3 properties in FY 2019 under this new initiative. A second partnership was formed with Affordable Housing Network Inc to rehabilitate affordable units after acquisition. The City of Dubuque assisted AHNI with acquiring one home and was also successful in the transfer of a petitioned property from the City to AHNI for rehabilitation. These partnerships have started to help the

City of Dubuque meet the goals to serve the households listed above, but they are new initiatives. Start-up logistics stopped the completion of rehabilitation of existing units, but should be accomplished in FY 2020 now that the start-up is completed.

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 sometimes is not enough to reduce the price of the home 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. The production of Housing TIF to serve this purpose was created by the City of Dubuque, and it currently being used to rehabilitate homes that are affordable and sell them to low/mod income residents. This is being done through a partnership with True North, Affordable Housing Network Inc, and Community Housing Initiatives.

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	1	0
Low-income	5	0
Moderate-income	8	0
Total	14	0

Table 13 – Number of Households Served

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 (3); Small & Large Homeowner Rehab (11). 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. 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. Additional efforts are

being made to specifically serve the extremely low-income residents, and a Equitable Poverty Prevention Plan will help guide those efforts and programs as we move into FY 2020.

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.

Over 50 individuals make up the membership of the Homeless Advisory Council, working to streamline and coordinate services and resources to meet the needs of homeless and near homeless community members. Non-profit organizations providing homeless services including but not limited to referrals, outreach, point-in-time count, coordinated entry, emergency & transitional shelter, and permanent supportive housing. Organizations providing family self-sufficiency, advocacy, employment, employment services & job training, substance abuse services, health, wellness, domestic violence, sexual assault, mental health and dental services are available, as well as representation from the City of Dubuque Police Department, Housing Authority, and Dubuque County Commission of Veteran's affairs.

The Homeless Advisory Council coordinates point-in-time homeless counts in July and January to evaluate capacity and need for services. Hillcrest Family Services provides outreach, in partnership with other organizations coordinating access for unsheltered persons. The City partners with East Central Development Corporation (ECDC) to provide permanent supportive housing, targeting homeless populations with mental health, HIV/AIDS related illness, and/or substance abuse.

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 2019, shelter services were funded in the amount of \$12,777 to support the transitional and emergency women's shelters. The City also 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.

The City had 8 organizations providing access to emergency and transitional shelter services during the January 2019 point in time homeless count. Some of these organizations serve specific populations, such

as pregnant women and victims of domestic violence. The bed capacity for these organizations is 167 and 116 persons were sheltered. The Hope House, Dubuque Rescue Mission, and Hillcrest Family Services were at full or over capacity at the time of the survey. These organizations serve men and families, representing high need in the community. Overall, 69% of the available beds were full. Programs with vacancies on the day of the survey include: Dubuque Rescue Mission Transitional, Teresa Shelter (Emergency), the Dubuque Community Y Domestic Violence Program, Maria House, Mary's Inn (pregnant women), Francis Apartments, and Almost Home.

Shelter Name	Type	Capacity	Guests	% of Capacity	Population Served
Dubuque Rescue Mission	Emergency	24	30	125%	Men
Hope House	Emergency	8	8	100%	Families
Dubuque Rescue Mission	Transitional	12	11	92%	Men
Teresa Shelter	Emergency	30	20	67%	Women & Children
Almost Home	Emergency	12	7	58%	Men
Mary's Inn	Maternity	8	4	50%	Pregnant Women
Dubuque Community Y Domestic Violence Program	Emergency	17	8	47%	Victims Fleeing Violence
Maria House	Transitiona	24	9	38%	Women & Children

Table 1 - Emergency & Transitional Housing

Helping low-income individuals and families avoid becoming homeless, especially extremely low-income individuals and families and those who are: likely to become homeless after being discharged from publicly funded institutions and systems of care (such as health care facilities, mental health facilities, foster care and other youth facilities, and corrections programs and institutions); and, receiving assistance from public or private agencies that address housing, health, social services, employment, education, or youth needs

The City of Dubuque and State of Iowa require publically funded institutions and facilities to have discharge plans that include adequate and stable housing; however, the follow-up on those plans is difficult in many situations. The City of Dubuque established a rapid re-housing fund that starts in FY 2020 in case a short-term issue is found when executing a discharge plan for a resident. The City of Dubuque is also working with many community non-profits and business partners to establish a “one-stop shop” for assistance that is provided across multiple agencies, but can easily be accessed under the umbrella of one entity to help this vulnerable population access assistance.

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.

There are three permanent supportive housing programs offered in Dubuque. The City provides the Continuum of Care funded Phoenix Housing program, serving homeless individuals and families with disabilities. Hillcrest Family Services provides permanent supportive housing for women and children, and Opening Doors (Francis Apartments) provides permanent supportive housing opportunities for families. During the January 2019 point-in-time count, these programs had capacity for 55 individuals and were 78% full.

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. The City promotes CDBG funded programming to voucher participants in efforts to increase awareness and participation in activities.

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, serving as the PHA, ensures leasing to 95% of the budget capacity, as required by the Voluntary Compliance Agreement. The Rehabilitation Supervisor at Housing & Community Development works with Family Self-Sufficiency and Gaining Opportunities participants to increase awareness about homeownership options.

All Housing Choice Voucher participants are invited to join the City's Family Self-Sufficiency (FSS) and Gaining Opportunities 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 Gaining Opportunities 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.

Actions taken to provide assistance to troubled PHAs

The PHA is not troubled.

CR-35 - Other Actions 91.220(j)-(k); 91.320(i)-(j)

Actions taken to remove or ameliorate the negative effects of public policies that serve as barriers to affordable housing such as land use controls, tax policies affecting land, zoning ordinances, building codes, fees and charges, growth limitations, and policies affecting the return on residential investment. 91.220 (j); 91.320 (i)

The City's 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. This Analysis of Impediments will be re-evaluated by a consultant and a new 5 year Analysis will be presented to the City Council in January 2020.

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.

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 April 2019 was awarded \$581,000 in Healthy Home funds and \$2,999,968 in lead hazard control funds for a total of \$3,580,968. The program has a local match of \$648,454 and proposes to do 120 units in the 3.5-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 six 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 unemployment 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, 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 developed a rental rehabilitation program in FY 2019 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.

Multiple departments continue compiling a data library and develop 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 completed by these departments focuses on equity and identifying how the institution can provide more equitable services.

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/October 2018, 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.

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 demonstrate what support services will be available to residents. Locations of projects are carefully considered to ensure residents 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. initiative (Comprehensive Housing Activities for Neighborhood Growth and Enrichment) to identify and rehabilitate downtown housing units. The program is designed to acquire, rehabilitate, and sell previously dilapidated 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, and True North, multiple single-family homes 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 of Dubuque made progress in the following actions in FY 2019:

October 2018

- Fair Housing Training Sessions held

February 2019

- City staff presented 2018 SOI Progress Report to the City Council, identifying 8 points of data needed to effectively analyze the housing needs of Housing Choice Voucher holders.
- Housing & Community Development Department establishes equity training once a week
- Housing & Community Development Department forms an equity team to evaluate insitiutional barriers such as policies and procedures that unintentionally create disparate impacts on certain populations.

March 2019

- City partners working on neighborhood revitalization through rehabilitation of housing establish a time to meet monthly to establish metrics and data to collect to measure potential unintentional consequences of the work being completed.

April 2019

- Workshop on Equity at Work Infusing Intercultural Strategies from Self to Systems – 2 Sessions
- City of Dubuque released from a significant amount of administrative burden created by bi-annual reporting requirements of the VCA as a recognition of the City's compliance with the Agreement.

May 2019

- Housing Commission and Resident Advisory Board approve revisions to Administrative Plan on Applications, Waiting List and Tenant Selection (Chapter 4).
- Workshop on Equity at Work Infusing Intercultural Strategies from Self to Systems – 2 Sessions

June 2019

- City staff began planning for fall 2019 staff Fair Housing training
- City Council approves revisions to Administrative Plan on Applications, Waiting List and Tenant Selection (Chapter 4).
- Advertisement of the Waiting List opening July 9th, 2019, and on the second Tuesday of each month thereafter, is released.

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

In March 2019, the responsibility for monitoring the CDBG programs was transferred from the Budget Department to the Housing & Community Development Department. The Community Development Specialist provides technical assistance and coordinates with department directors to ensure compliance with CDBG regulations; however, a lack of oversight at the executive level of the organization caused significant delays in meeting reporting requirements. The Housing & Community Development Director is now tasked with the oversight of the CDBG funding, to ensure reporting regulations are being followed by the Community Development Specialist.

Pre-funding Preparedness: The Community Development Specialist provides 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. New sub-recipients outside of the City are also provided one-on-one technical support prior to project implementation ensure contracting, eligibility, reporting, and national objective requirements are met.

Contract Management: Most CDBG contracts are overseen by the Housing & Community Development 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 by the Community Development Specialist to sub recipients and project managers throughout the contract period. Most sub recipients do monthly draws where supporting documentation is verified.

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 using an electronic form. City Departments using CDBG funds are monitored by their respective Department Managers and the Housing & Community Development Director.

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 Budget and 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 Community Development Advisory Commission reviews the Citizen Participation Plan annually. Agendas are posted in the Housing Department, City Hall, and distributed to a list serve where anyone can receive notification when 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.

The Community Development Advisory Commission accepts comments on performance at all meetings, but also has an online form for comments throughout the year. City staff is also available to accept comments on performance on a daily basis over the phone or through email and brings any comments received to the Community Development Advisory Commission to be recorded in the minutes and commented on by the public/commission members. The Community Development Advisory Commission set a public hearing on this specific report on July 17th, 2019 and posted a public notice of such, which is attached here. The public hearing will be held on August 28th, 2019 at 5:30pm, and comments received will be documented as an attachment.

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 Dubuque historically had a significant amount of unspent funds based on lack of administrative oversight and a concerted effort to keep a steady stream of work being completed in the community throughout the entire plan year. This not only caused timeliness issues in the past, but made

it difficult for partners using CDBG funding to administer their programs effectively. Through FY 2019, changes were made to program oversight to place benchmarks on program spending, and provide outreach to grantees to ensure spending was in line with outcomes being reported.

The City of Dubuque has been working hard to promote the use of the community development programs to marginalized community members and those with significant barriers to navigating systems. Targeted outreach was completed to test if that would encourage additional participants from marginalized neighborhoods, but that was not an outcome. At the end of the plan year, the City changed its focus to being part of "in-group" activities and events to reach this community. It is too early to see if this approach will be effective, but in conjunction with this approach policies are being reviewed to remove additional barriers that were institutional. Reaching community members in the extremely-low income category appears to be a need that will be identified in the next consolidated plan.

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

No

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

CDBG Eligible Areas Map

