



2020 CONSOLIDATED ANNUAL  
PERFORMANCE AND EVALUATION  
REPORT (CAPER)

CONSOLIDATED ANNUAL PERFORMANCE  
AND EVALUATION REPORT (CAPER)  
2020 PROGRAM YEAR  
AUGUST 1, 2020 TO JULY 31, 2021

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Presented to the U.S. Department of Housing and Urban Development  
Portland Field Office of Community Planning and Development

CITY OF LEWISTON, IDAHO  
DUNS #040197261

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Submission Date: October 28, 2021

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# **SECOND YEAR CONSOLIDATED ANNUAL PERFORMANCE EVALUATION REPORT (CAPER)**

This 2020 CAPER represents the third year performance report of the 2018-2022 Consolidated Plan annual action plan supplement. Data and narrative are entered into a federal database system called the Integrated Disbursement and Information System (IDIS) and the CAPER report is downloaded into a Word format from there. The CAPER template in IDIS has a series of prescribed questions that align with the Community Development Block Grant (CDBG) and Consolidated Plan program regulations. The report presented is in the HUD-prescribed format from data entered into IDIS.

## **EXECUTIVE SUMMARY**

The City of Lewiston (City) has prepared this CAPER for the period of August 1, 2020 through July 31, 2021 (Program Year). In accordance with the federal regulations found in 24 CFR 91. The CAPER presents the progress in carrying out projects and activities pursuant to the 2020 Program Year Annual Action Plan for CDBG funding received from the U.S. Department of Housing and Urban Development (HUD) to principally benefit low- and moderate-income persons.

At the beginning of each program year, the City prepares an Annual Action Plan that informs HUD and citizens what goals and objectives the City intends to meet with CDBG funding during the upcoming year. At the end of the program year, the City prepares a CAPER to illustrate the actual accomplishments achieved during that year. The CAPER allows HUD, local officials and citizens to assess the use of available resources and to assess the efforts made to achieve the goals and objectives identified in the five year (2018-2022) Consolidated Plan and Annual Action Plan.

This annual report, the 2020 Annual Action Plan and other related documents may be accessed through the City's website at: <https://www.Cityoflewiston.org/316/Plans-Reports>

## **CR-05 – GOALS AND OUTCOMES**

**Progress the jurisdiction has made in carrying out its strategic plan and its action plan.**

### **91.520 (a)**

The 2020 CAPER represents activities and programs carried out in the third Annual Action Plan completed under the City of Lewiston's 2018-2022 Five-Year Consolidated Plan. Activities addressed the needs and priorities identified in the Consolidated Plan and focused efforts on activities that were identified as high priorities.

The City of Lewiston's 2020 CDBG Action Plan initially programmed the \$248,689 to the following activities:

- First Step4Life \$25,979.00
- Interlink \$24,480.00
- Green Apple Project \$5,000.00
- Habitat for Humanity \$5,000.00
- OUI HVAC & PPE \$28,000.00
- CAP Assistance \$25,000.00
- Home Repair Program \$120,000.00
- Program Administration \$15,170.00

During the course of the program year, activities made great progress and the City had a timeliness test of .99. In accordance with the CDBG regulations at 24 CFR 570.902, the City must have a balance no greater than one and one-half (1.5) times its annual grant remaining in the Line of Credit, 60 days prior to the end of the program year.

Projects completed during the 2020 program year included Interlink, Green Apple, OUI, CAP, and Program Administration. There are 9 homes still in progress for the Home Repair Program, with 1 being completed. The remaining two projects, Habitat and First Step, are experiencing delays and funds may be reprogrammed.

**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)).**

**Table 1 – Accomplishments (Program Year)**

GOAL	OUTCOME				
	INDICATOR	EXPECTED	ACTUAL	UNIT OF MEASURE	PERCENT COMPLETE
Preserve and Expand Affordable Housing	Public service activities other than LMI housing benefit	8	35	Persons Assisted	437.5%
	Homeowner Housing Rehabilitated	13	10	Household Housing Unit	76.92%
Provide Services and Economic Opportunity	Public service activities other than LMI housing benefit	310	446	Persons Assisted	143.87%
	Public service activities for LMI housing benefit	50	26	Households Assisted	52.00%
	Homelessness Prevention	0	26	Persons Assisted	0%
	Housing Code Enforcement/Foreclosed Property Care	5	0	Household Housing Unit	0%
Improve Public Facilities & Infrastructure	Public Facility or Infrastructure activities other than LMI housing benefit	0	366	Persons Assisted	0.00%
	Façade treatment/business building rehabilitation	1	1	Business	100%

**Table 2 – Accomplishments (Consolidated Plan to Date)**

GOAL	CDBG FUNDING	OUTCOME				
		INDICATOR	EXPECTED	ACTUAL	UNIT OF MEASURE	PERCENT COMPLETE
Improve Properties Through Blight Elimination	\$100,000	Buildings Demolished	5	0	Buildings	0.00%
		Public Facility or Infrastructure activities other than LMI housing benefit	5675	1988	Persons Assisted	35.03%

		Façade treatment/business building rehabilitation	0	1	Business	0%
Preserve and Expand Affordable Housing	\$120,000	Public service activities other than LMI housing benefit	0	35	Persons assisted	0%
		Rental units rehabilitated	0	7	Household Housing Units	7%
		Homeowner Housing Rehabilitated	20	21	Household Housing Unit	105%
		Housing for Homeless added	0	0	Household Housing Unit	0%
		Housing for People with HIV/Aids added	0	0	Household Housing Unit	0%
Provide Fair Housing Education & Enforcement	\$16,242	Public service activities other than LMI housing benefit	40	41	Persons Assisted	102.50%
Provide Services & Economic Opportunities	\$145,000	Public service activities other than LMI housing benefit	0	446	Persons Assisted	0%
		Public service activities for LMI housing benefit	25	26	Households Assisted	104%
		Homelessness Prevention	0	26	Persons Assisted	0%
		Housing Code Enforcement/Foreclosed Property Care	0	0	Household Housing Unit	0%
Support Housing & Services for the homeless	\$144,720	Homelessness prevention	30	16	Persons Assisted	53.33%

**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.**

The City of Lewiston’s 2018-2022 Five Year Consolidated Plan identifies priorities as follows:

1. Preserve and Expand Affordable Housing
2. Support Housing and Services for the Homeless
3. Improve Public Facilities and Infrastructure
4. Provide Services and Economic Opportunities
5. Improve Properties through Blight Elimination
6. Provide Fair Housing Education and Enforcement
7. Program Administration

The 2020 Action Plan addressed the priority needs of:

1. Preserve and Expand Affordable Housing through assistance with residential rehabilitation for low and moderate income homeowners;
2. Support Housing and Services for the Homeless
3. Improve Public Facilities and Infrastructure
4. Program Administration through the development of an ADA Transition Plan and program administration and planning.

DRAFT

## 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)

Table 3 – Table of Assistance to Racial and Ethnic Populations by Source of Funds

	CDBG
White	621
Black or African American	7
Asian	3
American Indian or American Native	31
Native Hawaiian or Other Pacific Islander	0
<b>Total</b>	<b>662</b>
Hispanic	91
Non-Hispanic	571

### Narrative

Families assisted during the 2020 program year were as follows:

#### **GREEN APPLE**

White – Hispanic: 1

White – Non Hispanic: 3

American Indian or Alaskan Native – Hispanic: 1

#### **OUI**

White – Hispanic: 4

White – Non Hispanic: 138

Black or African American – Non Hispanic: 2

American Indian or Alaskan Native – Non Hispanic: 1

Unknown/Unspecified: 221

The first two quarterly reports did not break down the 221 persons assisted during those periods. Since there is no location to enter unknown, this number has been entered in the White – Non Hispanic Category in the table above.



**FIRST STEP4LIFE**

White – Hispanic: 30

White – Non Hispanic: 30

Black or African American – Non Hispanic: 1

American Indian or Alaskan Native – Hispanic: 8

American Indian or Alaskan Native – Non Hispanic: 8

**INTERLINK**

White – Hispanic: 20

White – Non-Hispanic: 15

**HOME REPAIR PROGRAM**

White – Non-Hispanic: 8

Unknown/Unspecified: 2

A category for unknown is not provided in the reporting system; therefore, they are included in the White – Non Hispanic category in the table above.

**YOUTH RESOURCE CENTER**

White – Non Hispanic: 74

White – Hispanic: 2

Black or African American: 2

Asian – Non Hispanic: 3

American Indian or Alaskan Native – Non Hispanic: 9

American Indian or Alaskan Native and White – Non Hispanic: 3

Black or African American and White – Non Hispanic: 2

Unknown/Unspecified: 51

A category for unknown is not provided in the reporting system; therefore, they are included in the White – Non Hispanic category in the table above.

**COMMUNITY ACTION PARTNERSHIP**

White – Hispanic: 24

American Indian or Alaskan Native – Hispanic: 1

## CR-15 – RESOURCES AND INVESTMENTS 91.520(A)

### Identify the resources made available

Table 4 – Resources Made Available

Source of Funds	Resources Made Available	Amount Expended During Program Year
CDBG	413,462	254,523

### Narrative

The City had a total of \$90,372.86 at the end of the 2019 program year. This amount, plus the 2020 award of \$248,689 and \$74,399.88 in program income, brought the total CDBG resource to \$413,461.74.

Total funds expended during the program year was \$254,523.32. Funds expended went towards the following projects:

✓ 2020 Administration	\$14,559.66
✓ First Step4Life - Ruins 2 Recovery	\$15,886.70
✓ Green Apple Scholarship Fund	\$5,000.00
✓ OUI HVAC Rehab	\$17,360.48
✓ CAP Membership Assistance Program	\$25,000.00
✓ Home Repair Program (includes advertising and lead based paint inspections)	\$123,314.94
✓ Interlink ADA Ramps	\$24,480.00
✓ OUI PPE	\$3,926.54
✓ 2019 Staircase Feasibility Study	\$24,995.00

Of the remaining \$158,938.42, \$115,246.02 is allocated to the following remaining projects:

✓ Habitat for Humanity – Tool Library	\$5,000.00
✓ Home Repair Program	\$92,734.30
✓ OUI PPE	\$6,712.98
✓ First Step4Life – Ruins 2 Recovery	\$10,092.30
✓ 2020 Administration	\$707.34

This leaves approximately \$43,691.50 unallocated and to be programmed to an eligible activity. Staff is waiting to hear from Habitat for Humanity and First Step4Life before reprogramming their funding. Both of these projects have been stalled and not made any progress.

**Identify the geographic distribution and location of investments**

All projects were in the City of Lewiston, Idaho 83501. The City of Lewiston has not targeted specific areas as part of its strategic use of CDBG funds; however, the City used funds to benefit low and moderate-income neighborhoods and households over the program year.

**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 continues to actively seek out partnerships with housing and social service providers to utilize a variety of Federal, State, and local funding sources to meet the needs identified in the consolidated plan. The City has actively supported low income housing tax credit projects sponsored by private developers. The CDBG funds used in these projects help leverage significant private investment by other community members, resulting in quality housing being built and creating a lasting asset for the property owner and community.

Subrecipients utilize their own additional resources in the form of private and local funds.

DRAFT

## 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.

Table 5 – Number of Households

	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	10	36
Number of special-needs households to be provided affordable housing units	8	35
<b>Total</b>	<b>18</b>	<b>71</b>

Table 6 – Number of Households Supported

	One year goal	Actual
Number of households supported through rental assistance	5	26
Number of households supported through the production of new units	0	0
Number of households supported through rehab of existing units	13	45
Number of households supported through Acquisition of existing units	0	0
<b>Total</b>	<b>18</b>	<b>71</b>

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

The 2020 Action Plan broke down the estimated number of persons assisted through Housing Affordability as follows:

- Community Action Partnership (rental assistance) – 5
- Home Repair Program (residential rehabilitation) – 5
- Interlink (ADA rehabilitation) – 8

The actual numbers during the 2020 program year were:

- Community Action Partnership (rental assistance) – 26
- Home Repair Program (residential rehabilitation) – 10
- Interlink (ADA rehabilitation) – 35

**Discuss how these outcomes will impact future annual action plans.**

This year was the most successful for the City’s Home Repair Program in terms of applications received. A total of 22 applications were submitted. Of the 22 submitted, 2 were ineligible, 3 were incomplete, 5 were withdrawn, 1 was terminated, and 1 was waitlisted. The success of advertising

additionally brought in 17 online applications through the Neighborly software, although these were not actually submitted. The City implemented a cloud-based software, Neighborly, that allows staff to improve the way the CDBG program is managed. Staff can accept, review and score applications, allocate and track subrecipient funding, track program income, generate CAPERs reports and enable subrecipients to submit invoices, accomplishment reports, and section 3 reports. The software also allows applicants to select their primary language and is easy for applicants to use.

The City will continue to look for ways to provide affordable housing for its citizens including working with the nonprofit agencies within the community to provide housing. The City will also continue to ask for CDBG funds to be used in support of its affordable housing programs and will continue to look for additional ways to fund infrastructure.

All but two projects proceeded in a timely manner and, for the first time in a while, the Timeliness test was not a major concern for the City. While a majority of the projects were public services, future action plans will still have the 15% cap on public service activities. Staff hopes to continue to provide a few public services in future action plans as well.

**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 eligibility of the activity.**

Table 7 – Number of Households Served

Number of Households Served	CDBG Actual
<b>Extremely Low-income</b>	353
<b>Low-Income</b>	271
<b>Moderate-income</b>	17
<b>Non-Low Income</b>	12
<b>Total</b>	<b>653</b>

**Narrative Information**

These numbers include all reporting data for the 2020 program year.

## **CR-25 – HOMELESS AND OTHER SPECIAL NEEDS 91.220 (D, E); 91.320 (D, E); 91.520(C)**

**Evaluate the jurisdiction’s progress in meeting its specific objectives for reducing and ending homelessness through:**

### **Reaching out to homeless persons (especially unsheltered persons) and assessing their individual needs**

The First Step4Life received funding to assist in transportation needs of homeless persons. During the 2020 program year, funding allowed them to reach new peers and maintain a presence with their current peers. Basic living items were provided to that community as part of the Ruins 2 Recovery program. A report provided in May indicated they provided 86 food bags, 53 hygiene kits, 37 backpacks, clothing items to 9 peers, 10 sleeping bags, 7 tents, and 200 nights in hotel rooms to those who are living while homeless within the community. Funding also allowed them to establish a schedule that effectively brought outreach into smaller communities while still maintaining the outreach in Lewiston and reporting requirements. Ruins 2 Recovery reported that many peers came into the center and received recovery coaching and assistance in finding and walking their own paths to success. They provided rental assistance to three struggling Lewiston families, and provided sober living to eight peers.

The City does not own or fund any homeless shelters, transitional housing, or public housing itself, but relies on and supports other organizations to provide these services. Idaho Housing and Finance Association (IHFA), Family Promise, the Salvation Army, Community Action Partnership, and the YWCA assisted in the form of rental vouchers, shelter nights, and counseling to families and individuals who faced eviction or were homeless.

### **Summary of Efforts to Address “Worst Case Needs”**

“Worst-case” affordable housing needs are defined as housing needs by low-income renters with severe cost burden, in substandard housing, or involuntarily displaced. During the program year, Section 8 was provided by the Idaho Housing and Finance.

The City of Lewiston meets with resource providers in an effort to define new projects for the upcoming CDBG program year. Staff is researching other ways to address the highest identified priority need of the Consolidated Plan, Preserve and Expand Affordable Housing. Possibilities include a landlord incentive program, down payment assistance program, and continuation of the residential rehab program.

Housing resources in the Lewiston Area include:

- Community Action Partnership – offers affordable rental housing through their housing program;
- Community on Call – offers transitional housings for individuals returning from long term rehab treatment programs;
- Habitat for Humanity – builds affordable housing for low-income families;
- Idaho Housing and Finance Association – provides Family Self-Sufficiency Program, Housing and Urban Development Vouchers Program, and Rental Assistance;
- Senior Rent Assisted/Controlled & Subsidized Apartments – there are seven (7) complexes in the City of Lewiston;
- Nez Perce County Assistance Program – provides limited emergency services (medical, rental, and utility assistance);

- Salvation Army – provides emergency assistance, which includes housing and rental assistance.

### **Progress in Meeting Needs of Persons with Disabilities**

The City of Lewiston completed and adopted the ADA Transition Plan to help identify barriers to accessibility in the City of Lewiston. Interlink assisted persons with disabilities by removing barriers to accessibility. The Green Apple Project assisted families that have children with disabilities.

Through the Police Homeless Project, the City of Lewiston Police Department implemented a bicycle patrol program. So far, the program has had a positive impact on the homeless population and have strengthened relationships with resources in the valley to help persons experiencing homelessness.

The City of Lewiston has used prior CDBG program year funding to improve mobility and accessibility to sidewalks, as well as multi-unit rehabilitation in Lewiston. Five (5) apartment complexes are disabled rent assisted/controlled and subsidized in the City of Lewiston. Community Action Partnership offers a Representative Payee Program that works directly with beneficiaries and other service providers to help low-income, disabled clients live independently. Disability Action Center Northwest provides information and referral services for persons with disabilities.

### **Addressing the emergency shelter and transitional housing needs of homeless persons**

No CDBG funds were allocated to address emergency shelter and transitional housing needs of homeless person but the City continued to explore opportunities to collaborate with local nonprofit organizations through the Interagency and Regional Coalition meetings.

YWCA continued to provide 10 shelter beds for families with children and 12 for victims of domestic violence. Salvation Army provided six beds for families with children and Family Promise provided four beds for families with children.

During the 2020 program year, multiple community members expressed concern regarding emergency shelter for persons experiencing homelessness. An informal committee was created to address the issue and research possible resources and two local groups are working towards getting a warming shelter up and running before the colder months hit. Neither group applied for funding during the 2021 CDBG Notice of Funding Availability (NOFA) process.

Towards the end of the program year, Union Gospel Mission approached the Lewiston City Council with a proposal to build a high-barrier shelter under a new definition of Bridge Shelter Housing. More information will be provided in the upcoming CDBG program year 2021.

**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 supported low-income individuals and families to avoid becoming homeless by bolstering the supply of affordable housing through its Home Repair Program and the Community Action

Partnership Emergency Assistance Program. Community Action assisted low-income individuals and families avoid facing homelessness by providing emergency assistance payments to help those affected by COVID-19.

Several local agencies continued to address homeless needs for chronically homeless individuals and families, families with children, veterans, and unaccompanied youth. These agencies assisted through emergency housing, case management services, referrals to housing providers, and other programs.

Chronically Homeless Individuals and Families: First Step4Life served chronically homeless individuals and families with substance abuse counseling and case management to assist participants in addressing barriers to housing and self-sufficiency. Salvation Army continues to operate a hygiene center available for use by people experiencing chronic homelessness and provide street-level outreach to homeless individuals and families in Lewiston, including those who are unsheltered.

Families with Children: Emergency shelter resources that continued to operate included the YWCA (10 shelter beds for families with children and 12 for victims of domestic violence), Salvation Army (6 beds for families with children), and Family Promise (4 beds for families with children). Family Promise's case management services designed to help a family obtain and maintain employment, save money, and eventually move to permanent housing also continued during the program year. Community connections developed during the stay in Family Promise's transitional housing are designed to support the formerly homeless family once they move to permanent housing and prevent a return to homelessness.

Veterans and their Families: Resources dedicated specifically to homeless veterans and their families are very limited in Lewiston. Over the next year, this group can continue to access the programs and shelters described above, although resources are not anticipated to be dedicated specifically to housing, supportive services, and homelessness prevention for veterans. The American Warfighters works with community members to assist veterans facing critical emergencies.

Unaccompanied Youth: Idaho Youth Ranch continued to serve unaccompanied youth throughout Idaho with emergency shelter, residential care, youth and family therapy, job readiness training, and adoption services. Youth Ranch works with youth and their families so that when they are reunited, they are better able to communicate and avoid future issues, thereby shortening periods of homelessness and helping prevent a return to homelessness. The LC Valley Youth Resource Center has been extremely successful and has continued to assist at-risk youth with a place to stay and resources.



**Helping homeless persons (especially chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth) make the transition to permanent housing and independent living, including shortening the period of time that individuals and families experience homelessness, facilitating access for homeless individuals and families to affordable housing units, and preventing individuals and families who were recently homeless from becoming homeless again.**

The City provided CDBG funding for two activities to address the Homelessness and Homelessness Prevention needs to persons in the City of Lewiston. Local service providers continued to offer resources to help individuals and families avoid becoming homeless. These resources included:

- Rental assistance to help extremely low-income households and households receiving assistance from public and private agencies keep their housing and assist with utility and heating bills (when funding is available);
- Homelessness prevention for extremely low-income households and households receiving assistance from public and private agencies via utility payments for vulnerable households;
- Case management to gain stability and avoid homelessness for individuals discharged from correctional institutions and/or with criminal histories through Community Action Partnership;
- Community-based services for seniors designed to help older individuals avoid institutionalization and assist those in long-term care return to their communities through CAP. Services included case management, coordination of other community services, in-home health services, shopping assistance, transportation services, and other health and welfare information or referrals.

Supportive services for elderly and frail elderly continued to be provided through Community Action Partnership and Interlink. Case management services and referral services for other special needs populations, including people with disabilities (physical, mental, or substance abuse related) and people with HIV/AIDS, were continued through Community Action Partnership as well. Opportunities Unlimited, Inc. will also continue to provide supportive services to people with physical and developmental disabilities. Such services will include evaluation, training, employment, education, and other support services to increase independent functioning, vocational skills, and earned income. The City of Lewiston does not have any public housing units, and thus does not have service providers focused on support services for public housing residents.

## **CR-30 – PUBLIC HOUSING 91.220 (H); 91.320 (J)**

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

Per the hud.gov website, the State of Idaho has six public housing authorities: Idaho Housing and Finance Association, Nampa Housing Authority, Housing Authority of the City of Buhl, Housing Authority of the City of American Falls, Housing Authority of the City Jerome and Twin Falls Housing Authority. The Idaho Housing and Finance Association has a branch located in Lewiston.

No actions were taken to address the needs of public housing during the program year.

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

Per the hud.gov website, the State of Idaho has six public housing authorities: Idaho Housing and Finance Association, Nampa Housing Authority, Housing Authority of the City of Buhl, Housing Authority of the City of American Falls, Housing Authority of the City Jerome and Twin Falls Housing Authority. The Idaho Housing and Finance Association has a branch located in Lewiston.

No actions were taken to address the needs of public housing during the program year.

### **Actions taken to provide assistance to troubled PHAs**

Not applicable. The state PHA is not designated as 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 did not have any specific plans to address barriers to accessibility for the 2020 Program Year, but City staff continued to address issues regarding zoning, building/construction, rezoning and support of applications.

Current and ongoing City activities of the Lewiston Community Development Department to promote and encourage affordable housing include:

- Proactively and systematically seeking to rezone lands for affordable housing development.
- Proactively seeking developers to construct affordable housing.
- Facilitate and support of applications related to rezoning and construction for affordable housing.

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

Addressing underserved housing needs is increasingly difficult. To make housing affordable to very low-income households' deep subsidies are needed. At this point, appropriations for housing programs are not at levels to widely support deep subsidies. Additionally, the number of families and individuals needing access to services has increased and many times the capacity to fund and implement existing or additional programs is limited.

To help remove obstacles to meeting underserved needs and improve service delivery, staff worked with local non-profits and subrecipients to coordinate the work of social service organizations, disseminate news and information, and find solutions to local needs.

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

The City has implemented a residential rehabilitation program and continued to operate the program within the HUD Lead-Safe Housing regulations. Staff continued to attend trainings, as provided, to ensure they are appropriately trained in lead based paint, pamphlets are distributed, inspections and assessments are conducted when required, and that contractors trained in lead safe practices are used.

Prior to issuing a Notice to Proceed or beginning any type of project, an Environmental Review is completed. In addition to the requirements outlined in the Environmental Review, the potential for lead based paint is always addressed. When a structure is identified as built prior to 1978, a separate review is completed. A specialist is hired to review the possibility of lead based paint within the structure. If lead based paint is found, all individuals doing renovations, repairs and painting are required to be certified to safely complete improvements beyond minor repairs. Staff is working on revising policies and procedures to ensure they conform to Title X.

Based on research done by staff, there are approximately 7,696 homes built prior to 1978 in the City of Lewiston. Since initial lead based paint testing and assessment for homes are approximately \$6,000, it would cost the City around \$46,176,000. Annual allocations for the City of Lewiston are around \$250,000. This cost would not include abatement or clearance procedures. Additionally, staff would have to survey the homes to determine which homes are low-income residents in order to comply with program regulations. Staff has spoken to a HUD representative regarding the possibility of applying for the Healthy Homes Program. Research into this program is expected to continue during the 2021 program year to determine its feasibility.

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

The City continued to implement the Home Repair Program to help reduce the number of households in poverty.

All of the programs outlined in the Consolidated Plan are intended to provide benefits to residents that are considered low income and/or fall below the federal poverty line. The Community Development Block Grant Program's objectives are to develop viable communities that provide decent, safe, and sanitary housing, a suitable living environment, and expanded economic opportunities primarily for persons of low and moderate income. The City of Lewiston's CDBG program is utilized to make a difference in the lives of its residents by providing resources to address unique community development needs.

A weatherization program is offered through Community Action Partnership to help reduce energy costs.

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

The City coordinated with various public, private, and non-profit agencies in carrying out its activities. Collaboration between local, county and state agencies is important in successfully carrying out the goals and objectives identified in the Consolidated Plan and addressing community needs.

To develop internal structure, staff utilizes the HUD exchange for technical assistance, and trainings related to the CDBG programs policies and procedures. The newly implemented Neighborly Software allows staff to manage subrecipient information.

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

City staff continued to attend meetings of the Interagency, Region II Housing Roundtable, National Community Development Association, Northwest Association of Community Development Managers and the Regional Coalition to explore ways the City could plan for and support additional program resources.

**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 2018-2022 Analysis of Impediments to Fair Housing Choice identified the following impediments:

Limited Supply of Affordable Housing for Low and Moderate Income Households

Although Lewiston's CDBG funds alone are not sufficient to make a significant impact on the housing shortage in the City, staff continued to stimulate private-sector housing construction by:

- providing a letter of support to assist an affordable housing developer in acquiring land for affordable housing
- identifying underdeveloped properties ripe for additional development and mailing related information to 851 Lewiston residents
- continuing to operate the residential rehabilitation program (Home Repair Program)
- reviewing zoning ordinances for potential improvements
- translating materials into Spanish

Limited Supply of Accessible Housing for People with Disabilities

- provided funding to Interlink Agency to purchase ADA accessible ramps for 35 persons with disabilities in the City of Lewiston
- included ADA in the Home Repair Program to allow removal of barriers to persons with disabilities

Lack of Resources and Coordination for Fair Housing Outreach, Education and Enforcement Activities

- provided educational materials in the main lobby of the Community Development Department
- communicated with Idaho Legal Aid on training and funding opportunities
- translated materials into Spanish

## **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**

The newly implemented subrecipient tracking software allows the City to conduct a risk assessment on each project during the application process. This is done through a scoring sheet, which helps evaluate applications and make funding recommendations. During the program year, regular monitoring takes place with each quarterly report. Activities must show that they are complying with the stated requirements in the subrecipient agreement and provide corresponding data. The subrecipient software also provides sections for complete documentation to be uploaded and a tracking system to help accuracy on capturing beneficiary data. Project files are uploaded into a secure system, which includes project application, environmental review, agreements/liens, permits, invoices/draw requests and correspondence.

Other labor monitoring activities will be conducted, as activities require, according to all HUD and federal Davis Bacon labor requirements.

The City continues to utilize HUD's technical assistance and guidance to improve operating policies and procedures, as well as updating monitoring policies and procedures for the new software.

### **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.**

Citizens are notified of public hearings through a notice in the newspaper, City website, and press releases. Very few comments are received.

Two public hearings are done throughout the program year. Staff notices the public hearing for the 30 day comment period for the Annual Action Plan and then again for the Consolidated Annual Performance and Evaluation Report. If amendments are made to the Action Plan, they are also noticed and citizens are provided a 30-day comment period.

The City of Lewiston continues to Livestream City Council meetings and provide accommodations for persons with disabilities.

**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.**

No changes.

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

No

DRAFT