



**City of Albany, Oregon**  
**Consolidated Annual Performance Evaluation and Report**  
**For the Community Development Block Grant (CDBG) 2014 Program Year**

**Due to HUD: October 1, 2015**

**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 City of Albany receives an annual Community Development Block Grant (CDBG) entitlement from the U.S. Department of Housing and Urban Development (HUD). As a recipient of CDBG funds, the City is required to prepare a five-year strategic plan that identifies community needs, prioritizes these needs, and establishes goals and objectives to meet the needs. This five-year plan is called the Consolidated Plan.

Each year the City is also required to provide the public and HUD with an assessment of its accomplishments towards meeting the goals and objectives identified in the 2013-2017 Consolidated Plan. This report is called the Consolidated Annual Performance Evaluation and Report (CAPER). The CAPER also evaluates Albany's progress toward meeting the one-year goals identified in the Annual Action Plan.

The Fiscal Year 2014 Annual Plan was the City's second program year of Albany's 2013-2017 Consolidated Plan. The City received \$389,457 in CDBG funding for the 2014 program year that ran July 1, 2014 through June 30, 2015. In addition, the City carried over \$341,603 in 2013 program year CDBG funds into FY 2014.

In FY 2014, the City spent a total of \$498,461 in CDBG funds and served 311 Albany residents with jobs skills training, infant abuse prevention, G.E.D. testing, at-risk youth outreach and shelter acquisition, shelter for victims of domestic violence and women with children, transitional housing for homeless residents, housing rehabilitation, and small business development. Funds improved the accessibility and safety of Periwinkle Path by removing blighting conditions in one of Albany's local target areas, and also sponsored a fair housing training for landlords.

**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 on the following page compares the proposed outcomes with actual outcomes of the City's progress towards completing the 5-year goals identified in the Consolidated Plan and priorities identified in the 2014-15 Action Plan.

**Table 1 – Accomplishments - Program Year and Five Year Strategic Plan to Date**

Goal	Anticipated Five Year CDBG Allocation	14-15 CDBG Allocation	Indicator/Activity	Unit of Measure	Expected Five Year Outcome	Actual Five Year Outcome	Five Year Percent Complete	Expected 14-15 Outcome	Actual 14-15 Outcome	14-15 Percent Complete
1. Remove Barriers to Accessibility	\$222,000	\$0	Public Facility or Infrastructure Activities: Curb Ramp and Sidewalk Repairs	Curb Ramps Improved	50	0	0%	0	0	0%
	\$0	\$33,800	Public Facility or Infrastructure Activities: Periwinkle Path and Sunrise Park Improvements	Persons Assisted	0	0	0%	Reported under 7. Remove Blighting Influences		
2. Improve Affordable Housing	\$400,000	\$68,000	Housing Rehabilitation	Owned Units	20	4	20%	4	0	0%
				Rental Units	20	0	0%	0	0	0%
3. Increase Economic Opportunities	\$280,000	\$0	Facade treatment/business building rehab	Businesses Assisted	2	0	0%	0	0	0%
		\$19,550	Microenterprise Assistance, Small Business	Businesses Assisted	150	40	27%	15	24	100%
		\$29,550	Development., Job Creation	Jobs Created	40	11	33%	4	8	100%
4. Further Fair Housing	\$10,000	\$1,000	Education and Outreach	Households Assisted	100	28	28%	20	13	90%
5. Reduce Homelessness	\$160,000	\$0	Homelessness Prevention	Persons Assisted	50	23	14%	0	0	0%
		\$43,800		Trans'l Beds Added	20	16	85%	6	16	100%
6. Provide Public Services	\$302,000	\$57,400	Public Service Activities	Persons Assisted	500	336	59%	100	311	100%
7. Eliminate Blighting Influences	\$152,000	\$58,500	Public Facility or Infrastructure Activities	Persons Assisted	4000	1000	25%	2000	0	0%

**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 Albany allocated funding to address the following Consolidated Plan priorities and objectives in the FY 2014 Action Plan:

1. Remove Barriers to Accessibility: a) Curb Ramps and Sidewalks: The City met with residents in Census Tract 208 to identify infill sidewalk and intersection safety improvements needed to improve the safety and accessibility of routes to schools and services in the Sunrise neighborhood. b) Accessibility Improvements at or near Public Facilities: The City repaired and replaced 1,200 lineal feet of Periwinkle Path, which was deteriorating to the point of being dangerous to use, and reduced the grade of the path where it intersected with Queen Avenue.
2. Maintain and Improve the Quality of Affordable Housing: In FY 2014, finished spending the 2013 funds allocated to housing rehab through deferred payment, no-interest loans to four low-income owned units located in Albany's two Target Areas, Census Tracts 204 and 208. Due to little interest in loans, the City will be offering grants this year to improve housing occupied by households earning 60% of the AMI.
3. Increase Economic Opportunities: a) Microenterprise and Small Business Assistance: In FY 2014, 2013 CDBG funds provided scholarships to 18 low-income Albany residents to take microenterprise courses at Linn-Benton Community College (LBCC) and provided 49 hours of one-on-one advising. CDBG funds provided partial scholarships to 12 business owners to take management courses. Eighty-four hours of one on-one advising were provided. A Spanish-speaking instructor provided 19 hours of training and one-on-one advising to 12 Spanish-speaking residents. b) Job Creation: Albany residents taking courses and receiving one-on-one advising at LBCC created 13 new jobs made available or held by Albany low- and moderate-income residents. The City small grant program for microenterprises added 2 LMI jobs.
4. Further Fair Housing: In 2014, the City partnered with the City of Corvallis to hire the Fair Housing Council of Oregon to provide a fair housing training for landlords. Roughly eight resident landlords attended the training. City staff also investigated complaints from three households.
5. Reduce Homelessness: CDBG 2013 and 2014 funding was used to acquire houses to be used for transitional housing and a youth shelter, adding 16 total beds. Public services were provided to prevent homelessness of at-risk residents (discussed below).
6. Public Services: FY 2014 funds were awarded to reduce homelessness and provide services to Albany's special needs and low-income residents. Specifically, funds were granted to agencies to prevent youth homelessness through outreach and counseling, help special needs residents prepare and take the G.E.D. exam, provide shelter to Albany victims of rape and domestic violence, and provide shelter to homeless women with children.
7. Eliminate Blighting Influences in Low- and Moderate-Income Neighborhoods: The Consolidated Plan identified park equipment replacement and pedestrian path improvements as priority needs to remove blighting influences in one of Albany's low-income Census Tracts, Tract 208. a) Periwinkle Path: 2013 and 2014 program funds helped replace 1,200 lineal feet of Periwinkle Path that had become unsafe due to old and deteriorating concrete. The project removed blighting influences and

unsafe conditions. b) Sunrise Park Improvements. The Consolidated Plan identified the need to replace the 1980s park equipment with facilities that meet accessibility and safety standards. The park design will reduce vandalism and illegal activities that create blighting influences in the neighborhood. Additional 2014 CDBG funds were allocated to add an accessible parking lot. The parking lot required a revised environmental review record. The presence of hydric soils triggered the need for wetland delineation. The delineation is awaiting approval from the state. Once the wetland removal and fill permit are approved, construction should occur in 2016.

## 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 1 – Table of assistance to racial and ethnic populations by source of funds**

Race	Residents Assisted
White	290
Black or African American	7
Asian	1
American Indian or American Native	10
Native Hawaiian or Other Pacific Islander	3
<b>Total Residents</b>	<b>311</b>
Ethnicity	
Hispanic	61
Not Hispanic	250

### Narrative

During FY 2014, most of the 311 residents directly assisted with CDBG programming through public services, housing rehabilitation, and economic development opportunities were white. The ethnicity of Albany's residents served included 20% of Hispanic origin.

## CR-15 - Resources and Investments 91.520(a)

### Identify the resources made available

**Table 2 – Resources Made Available**

Source of Funds	Resources Made Available	Amount Expended During Program Year
CDBG	\$791,811	\$498,461

### Narrative

CDBG expenditures reimbursed through June 30, 2015, included funding for public services to remove blighting influences through public improvements to Periwinkle Path in Target Area Census Tract 208, housing rehabilitation, fair housing education, microenterprise training, small business assistance, reducing homelessness by adding transitional and shelter beds, and planning and administrative costs.

Goal	Activity	13-14	14-15
Remove Barriers to Accessibility	Periwinkle Path Improvements	\$11,313	\$0
Remove Blighting Influences in LMI Areas	Periwinkle Path Improvements	\$50,000	\$39,000
Affordable Housing - Maintain Livability	Housing Rehabilitation (owner-occupied deferred loans)	\$80,000	\$0
Economic Opportunities	Microenterprise Development	\$20,000	\$0
Economic Opportunities	Small Business Development	\$30,000	\$0
Reduce Homelessness	Transitional Housing Acquisition	\$32,000	\$8,800
Reduce Homelessness	Youth Shelter Acquisition	\$0	\$35,000
Public Services	Infant Abuse Prevention	\$30,150	\$0
Public Services	Youth Job Skills Training	\$30,150	\$0
Public Services	Shelter for Women with Children	\$0	\$9,230
Public Services	G.E.D. Program for Persons in Recovery	\$0	\$9,993
Public Services	At-risk Youth Outreach and Case Management	\$0	\$19,435
Public Services	Shelter for Victims of Rape and Domestic Violence	\$0	\$17,000
Public Services	Fair Housing Landlord Training	\$0	\$375
Program Administration	Staffing, Training, Advertising, Translation	\$18,807	\$57,208
	<b>TOTALS</b>	<b>\$302,420</b>	<b>\$196,041</b>

## Identify the geographic distribution and location of investments

**Table 3 – Identify the geographic distribution and location of investments**

Target Area	Planned Percentage of Allocation in 14-15	Actual Percentage of Allocation
Census Tracts 204 & 208	52%	67%

### Narrative

The City allocated \$204,100 in 2014 CDBG funds to activities in Albany’s two low- and moderate-income target areas, Census Tracts 204 and 208. The City completed improvements to Periwinkle Path in Census Tract 208 and helped two agencies acquire properties in Census Tract 204 for homeless housing (two transitional housing units and a youth shelter).

- \$68,000 for housing rehabilitation (not complete);
- \$39,000 for Periwinkle Path improvements (complete);
- \$19,500 for Sunrise Park improvements (not complete);
- \$33,800 to remove barriers to accessibility in the Sunrise area (not complete); and
- \$43,800 for homeless housing (complete).

The City held two neighborhood meetings with residents in the Sunrise neighborhood, located in Census Tract 208. The Sunrise Park remodel is the community’s top priority project because it will remove blighting influences in the neighborhood while restoring community pride. The project is delayed due to the need to address wetlands on the site. FY 2013, 2014, and 2015 funding is allocated to complete the park remodel. CDBG funds have also been allocated to sidewalk and curb ramp improvements in the Sunrise area to improve the safety and accessibility of primary routes to the local elementary and middle schools.

### 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.**

Albany’s CDBG-funded activities leveraged private, state, and local funds in the 2014 Program Year:

- Housing Rehabilitation—CDBG funds leveraged \$38,050 in local funding and \$575 in Federal weatherization funding, and private grant funds.
- Small Business Management Program – CDBG funds leverage approximately \$5,000 in private funding from business owners, and \$2,000 in state education funding.
- YouthBuild Job Training Public Services Program—CDBG funds leveraged \$35,420 in Oregon Youth Conservation Corps and Federal Workforce Investment Act funding.
- Local public service agencies receiving FY 2014 CDBG funding leveraged almost \$33,000 in private funds.

No publicly owned land within the City of Albany was used to address housing, homeless, or other special needs identified in the Consolidated Plan.

## 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 4 – Number of Households**

	<b>One-Year Goal</b>	<b>Actual</b>
Number of Homeless households to be provided affordable housing units	4	6
Number of Non-Homeless households to be provided affordable housing units	3	3
Number of Special-Needs households to be provided affordable housing units	1	1
<b>Total</b>	<b>8</b>	<b>10</b>

**Table 5 – Number of Households Supported**

	<b>One-Year Goal</b>	<b>Actual</b>
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	4	4
Number of households supported through Acquisition of Existing Units	0	0
<b>Total</b>	<b>4</b>	<b>4</b>

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

Homeless provided housing: FY 2013 and 2014 CDBG funds were awarded to Albany Helping Hands, a local homeless shelter, to help them acquire two houses to be used as supportive transitional housing, adding a total of seven beds to the City's stock. One house provides five beds for five homeless individuals; the other provides two beds and is serving a two-person household.

Non-homeless households provided housing units and housing rehabilitation of existing units: FY 2013 CDBG funds provided loans to rehabilitate four low-income households through the housing rehabilitation deferred loan program. Four homes were rehabilitated in FY 2014, including one home owned by a disabled elderly resident. The FY 2014 CDBG allocation of \$68,000 to housing rehabilitation programs has not been spent. The Community Development Commission has decided to offer grants this year instead of loans as originally contemplated for housing rehabilitation of units occupied

by households earning less than 60% of the Area Median Income (AMI). About 30 low-income households on the waiting list for weatherization services also need housing rehabilitation. The rehabilitation grants will be offered in conjunction with weatherization. The City has no concerns meeting the five-year plan goals to improve the quality of affordable housing units; however, the City may have overestimated the number of rental units that will be rehabilitated with CDBG funding.

Special Needs Housing: This strategic plan goal is currently being addressed without the need for CDBG resources. Cascades West Council of Governments, a regional governmental agency, provides services to seniors, including services to help senior and disabled residents stay in their homes. The Linn Benton Housing Authority is the primary provider of affordable senior housing and housing for Albany’s disabled residents.

CDBG funds are available to improve housing for Albany’s special needs populations. Housing rehabilitation and essential repairs funding is available to help seniors stay in their homes or to address housing of other special needs residents. One disabled resident (noted previously) received a housing rehabilitation loan in 2014.

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

The City will evaluate whether or not there is a need to assist special needs populations with housing.

**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.**

**Table 6 – Number of Persons Served**

<b>Number of Persons Served</b>	<b>CDBG Actual</b>
Extremely Low-income (0-30% MFI)	196
Low-income (31-50% MFI)	43
Moderate-income (51-80% MFI)	47
<b>Total</b>	<b>286</b>

**MFI = Median Family Income**

**Narrative Information**

Client surveys were required for Albany residents receiving CDBG funding through public services or directly through housing rehabilitation programs or business development programs. The number of persons served in Table 7 is different than reported elsewhere because some of the CDBG-funded services were provided to at-risk children and youth. In addition, family income was estimated by at-risk youth. Two thirds of the residents/households assisted with CDBG funds in FY 2014 were extremely low-income, earning 30 percent or less of the median family income (MFI). Not included in the table are 15 at-risk youth whose families earned 81% or more of the MFI.

## **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**

A goal of the five-year Consolidated Plan is to prevent 50 residents from becoming homeless.

A local non-profit public service agency, Jackson Street Youth Shelter, received FY 2014 funding to do outreach and case management to Albany's homeless and at-risk youth at the Cornerstone Outreach Center. The agency assesses the needs of these young residents and works to reconnect them with their families or provide them with the skills to live independently. Jackson Street Youth Shelter served 104 of Albany's at-risk teens.

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

FY 2013 and 2014 CDBG funds were used to acquire two transitional housing units by Albany Helping Hands Shelter. The housing units are providing homeless residents stable housing that requires residents to participate in a "life-skills" program. One house has five adults and the other has two adults.

FISH of Albany received FY 2014 CDBG funds to provide shelter services to Albany's homeless women with children. In FY 2014, FISH sheltered 23 Albany residents for extended periods of time.

### **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 2014-15 Action Plan identified the following strategies and activities to help homeless residents and to prevent homelessness of Albany residents:

- Homeless Individuals – The Albany Helping Hands Shelter works with homeless and chronically homeless residents by encouraging them to enroll in their life-skills program. CDBG Funds helped expand the program by providing supportive transitional housing beds that will transition some of Albany's chronically homeless residents into supportive housing. The agency prepares life improvement plans and provides supportive services for approximately 12 months to include numerous life skills classes.
- Homeless Women with Children – FISH of Albany's Guest House received CDBG funding to expand their services to provide case management and support services to Albany's homeless women with children. In FY 2014, the Guest House rescued eight adult women and nine children from

homelessness. To date, five of these families transitioned into permanent housing and are paying rent. All families were connected to community resources and staff worked to develop the women's conflict resolution skills, financial management, cooking, hygiene, housekeeping and other independent living skills.

- Unaccompanied Youth – Jackson Street Youth Shelter provided street outreach and counseling to 104 of Albany's unaccompanied and at-risk youth. The agency also used CDBG funds to acquire a shelter building to be used as a youth shelter with transitional housing and support services for Albany's youth. The shelter opened in May 2015. Youth who do not have a place to return to can enroll in the Transitional Living Program. The program promotes self-sufficiency and will develop and work on a case plan using the Positive Youth Development approach.
- Victims of Domestic Violence and Sexual Assault – CDBG funds helped the Center Against Rape and Domestic Violence (CARDV) provide case management and safe shelter for 45 Albany victims until they were able to return home or make arrangements for safe housing.
- Substance Abuse – the recovery center Community Helping Addicts Negotiate Change Effectively (C.H.A.N.C.E.) staff worked with clients to help them prepare for and take the G.E.D. exam, an important first step in providing a foundation for the future.

**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**

FY 2013 CDBG funds spent in 2014 enabled the Family Tree Relief Nursery to expand their services to provide in-home infant child abuse prevention services to 57 Albany residents. This program helps prevent children from entering the foster care system. All of the children served this year stayed living safely with their families. In addition, the program helped parents gain valuable skills to reduce their risk of becoming homeless.

FY 2014 CDBG funding awarded to Jackson Street Youth Shelter provided case management to Albany's homeless and unaccompanied youth. These services will prevent the number of youth going into correctional institutions and is available to help those leaving these institutions. FY 2014 CDBG funds were also provided to the agency to acquire a building for a youth shelter that will also provide transitional housing for youth needing longer stays. Jackson Street staff helped Albany's at-risk youth gain skills to live independently and to address issues occurring within their families that caused them to become homeless.

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

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

The Linn Benton Housing Authority, the local housing authority, provides public housing and addresses needs of residents in public housing. City of Albany CDBG funds are not currently allocated to addressing needs of public housing.

The City consulted with the housing authority regarding needs that could be addressed with CDBG funds. There is demand for more housing for Albany's residents with mental disabilities. The housing authority is beginning to explore how to address these needs. The City will stay involved in these discussions.

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

None.

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

None.

## **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 of Albany's land use policies are generally favorable and support affordable housing, including density bonuses for affordable housing and provisions for accessory apartments. Additional affordable housing strategies were identified for further evaluation in the Albany Development Code and included in the Consolidated Plan. The City did not allocate resources to this effort in FY 2014.

The City provided four no-interest deferred loans to rehabilitate four low-mod housing units. Two loans went to households earning 50% or less of the MFI and two loans were to households earning less than 80% of the MFI. These loans improved the livability of these households and will provide long-term affordability.

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

Albany is fortunate to have a network of agencies that work together to meet the needs of Albany's underserved populations, including the elderly and disabled, residents dealing with addiction, and persons with mental, physical, or developmental disabilities. Lack of CDBG funding is the primary obstacle to meeting underserved needs. The City has allocated the maximum of 15% of its entitlement grant to public services each year to date.

The 2014-15 Action Plan identified the need to support residents with alcohol and drug addiction and victims of domestic violence or child abuse. In FY 2014, public service agencies provided support to five agencies to provide a variety of support services to Albany's underserved residents, and specifically addressed the Plan goals with the following services:

- Victims of Domestic Violence and Sexual Assault: the Center Against Rape and Domestic Violence received a grant of \$17,000 to expand their services for Albany residents. Funds were used to shelter 45 Albany residents in local hotels and safe houses.
- Child Abuse: the Family Tree Relief Nursery continued work in FY 2014 using CDBG funds to pay for an infant abuse prevention specialist to provide in-home counseling and case management to reduce the incidents of child abuse.
- Addiction Services: C.H.A.N.C.E., a local recovery agency, received \$10,000 in FY 2014 CDBG funds to pay for the costs associated with clients who need to take the G.E.D. exam and any preparatory courses. This program helped 50 clients gain skills and helped them further their education and employment. Of these residents, nine received their G.E.D., five are still working towards this goal, and five residents are pursuing other career paths that do not require a high-school certification.

The City will continue to work with area agencies and other public and governmental entities to identify ways to collaborate resources and programming to address underserved needs.

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

The City's 2014-15 Action Plan identified the following actions to be taken to address lead-based paint hazards.

- General Public Awareness: the City distributes lead hazard information pamphlets to residents seeking information about housing repairs to historic homes. The City provides links to lead safety information and brochures produced by the EPA and HUD from the City's website.
- Housing Rehabilitation Program Delivery: Lead hazard information is distributed to applicants applying for the housing rehabilitation loans and for any projects involving painted structures built before 1978. Loan recipients sign a lead disclosure form. Contractors working on the site are lead-certified and must comply with the EPA Renovate, Repair and Painting laws in addition to HUD's federal regulations. When rehabilitation projects involve homes constructed before 1978, a lead hazard evaluation will be conducted on surfaces that are proposed to be disturbed, or it will be assumed that lead is present. All contractors will use lead-safe work practices and interim controls or standard treatments must be taken on all applicable painted surfaces and presumed lead-based paint hazards by a qualified contractor.

A HUD monitoring visit in July 2015 identified additional steps that must be taken to reduce lead-based paint hazards, including the lead clearance test following the housing rehabilitation.

To ensure compliance with lead based paint standards by the City's subrecipient and all contractors, the City is developing a step-by-step instruction guide with reference to the federal regulations regarding lead based paint for housing rehabilitation projects.

City staff attended a lead-based paint training in August 2015 and has encouraged housing rehabilitation program staff (Community Services Consortium, who is a City grant subrecipient) to be lead-certified and to attend other trainings as necessary.

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

During the 2014 program year, the City took the following actions to reduce the number of poverty-level families in Albany:

- Increase Economic Opportunities: CDBG funding provided scholarships to low-income Albany residents to enroll in microenterprise courses that help residents learn how to start a business. Funds also provided reduced tuition to Albany's low-income microenterprises to enroll in the Linn-Benton Community College Small Business Management Program. In 2014, the City awarded two grants to start-up microenterprises to offset the costs of starting the business. These programs have added 13 full-time equivalent jobs to date.
- Provide Public Services: in FY 2014, the City allocated 15% of its entitlement award to public service grants. Five agencies and programs were selected for funding that serve Albany's lowest income residents, homeless residents, at-risk residents, and residents in recovery from alcohol and drug addiction.

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

Albany is fortunate to have a strong institutional structure in place to coordinate delivery of services.

The City partnered with many agencies this year through CDBG grant programs, which helped to strengthen the institutional structure. The City worked with subrecipients to ensure successful implementation of their programs to achieve the desired outcomes.

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

In 2014, the City took the following actions to enhance coordination between public and private housing and social service agencies:

- Staff met with the local housing authority and Linn County Mental Health to discuss needs of Albany's residents with mental disabilities.
- City staff met with several divisions of the local community action agency, Community Services Consortium, to discuss affordable housing needs, housing rehabilitation needs, and preventing residents from becoming homeless. The City has a CDBG subrecipient contract with Community Services Consortium to provide housing rehabilitation programs.
- City representatives participate in the Homeless Enrichment and Rehabilitation Team (HEART) meetings. HEART is comprised of various social service, health, housing, homeless advocates, and governmental agencies that work collaboratively to identify the needs of Albany's homeless and at-risk residents.
- Staff attended regional meetings to foster coordination between housing and social service agencies. Fortunately, other agencies are also working to make these connections, such as the Linn Benton Health Equity Alliance, the Linn Benton Housing Authority, and the Community Services Consortium.

**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 took the following action in FY 2014 to overcome the effects of impediments identified in *Albany's Analysis of Impediments to Fair Housing Choice and Plan* adopted in 2014.

- Lack of Understanding of Fair Housing Laws and Resources Available: The City sponsored a fair housing training for landlords. Approximately eight landlords attended this training. The City provided a landlord training about safety and livability that addressed site and neighborhood safety issues and common building code violations. Approximately 30 landlords attended this training.
- Linguistic and Cultural Barriers: The City distributed fair housing brochures provided by the Fair Housing Council of Oregon in English and in Spanish to area agencies. The City of Albany has a fluent Spanish-speaking staff member that was able to communicate with several residents about housing conditions that were reported and to provide fair housing brochures.

- Discriminatory housing rental practices: The City of Albany received three complaints from Hispanic residents regarding apartment living conditions and two complaints regarding fair treatment. Three cases were referred to the Fair Housing Council of Oregon (FHCO); however, not enough evidence was provided to initiate a case by FHCO. Staff encouraged two residents to allow the City to inspect their units. City code enforcement staff is working with these two landlords to make repairs to the units to improve their livability. Staff wrote letters to the subject landlords and mailed them fair housing and landlord tenant brochures.

## **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**

Desk-Monitoring: The City requires subrecipients to submit monthly and quarterly reports in order to monitor progress and identify issues on an on-going basis. Quarterly reimbursement requests are also encouraged so that financial records can be monitored regularly.

On-site Monitoring: The Consolidated Plan specifies that the City will conduct a risk-analysis to determine which programs are subject to a site monitoring visit. Because HUD was monitoring the City's CDBG programs in July 2015, the City elected to do a site monitoring visit of all subrecipients to determine if any had compliance requirements to address. The results of site monitoring were that, overall, subrecipients are using the proper forms to verify compliance with national objectives, have sound financial practices and anti-discrimination policies and practices, and are using good record keeping practices.

Future on-site monitoring will be determined by a risk-assessment. The City is preparing policies and procedures for conducting a monitoring risk-assessment to determine which programs and subrecipients have higher risks for compliance.

Lead Paint Monitoring: The City's monitoring forms were not adequate to ensure that lead-based paint hazard reduction standards were followed on-site with the housing rehabilitation projects. At least one housing rehab project will be monitored annually using the HUD lead-paint monitoring forms to ensure future compliance with all federal lead-based paint regulations.

To ensure compliance with lead based paint standards by the City's subrecipient and all contractors, the City is developing a step-by-step instruction guide and process checklists regarding lead based paint requirements for housing rehabilitation projects.

City staff attended a lead-based paint training in August 2015. The Community Services Consortium, subrecipient, has lead-certified inspectors on staff that will prepare required documentation for lead paint compliance.

## **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.**

Albany's Citizen Participation Plan requires a 30-day comment period on the CAPER. The Citizen Participation Plan requires the City to distribute a press release for comments on the CAPER and to post the notice on the City's website. The press release was also distributed to an email list of local service and housing agencies. The CAPER was available in print at Albany's two public libraries and also at Albany City Hall.

The CAPER was made available 30 days prior to the City Council public hearing on the CAPER (held September 23, 2015).

The Community Development Commission also took comments on the CAPER at the September 21, 2015, meeting. All meetings of the Community Development Commission are open to the public and the agendas and agenda packets are available on the City's website. Citizens are welcome to attend all meetings.

At the September 23, 2015 hearing, the City Council accepted citizen input on community development needs that could be addressed in future action plans and on the City's performance in administering the CDBG programs. One letter of appreciation was received from Ann Craig, executive director of Jackson Street Youth Shelter, a subrecipient. No other comments were received.

## **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.**

After two years of being a CDBG entitlement city, the City of Albany is coming to a better understanding of which types of programs are able to meet national objectives and all federal regulations, are attractive to residents, and produce the intended outcomes identified in the Consolidated Plan. Due to limited CDBG funding and staffing resources, the City is considering amendments to the following programs:

Economic Development – Commercial Rehabilitation: The City started a small grant program available to new businesses to offset start up costs. Initially, the City thought the grants could help businesses remove blighting conditions in Albany's low-income Census tracts through building improvements. However; grant funds are too small for building rehabilitation. In addition, there is urban renewal financial assistance for improvements to buildings located within the urban renewal district. The City will amend the Consolidated Plan in the future to remove the commercial rehabilitation goal to improve two commercial buildings.

Housing Rehabilitation – In General: The City's housing market analysis identified thousands of aging housing units and households that are experiencing housing cost burden. The rehabilitation loan program was designed to improve the quality and affordability of Albany's housing stock. Due to the economic downturn, and extremely low-incomes of residents, the City is finding there is less demand for loans than originally anticipated. The City has decided to change the essential repairs grant program to offer larger grants that can be used for housing rehabilitation. This shift should enable the City to meet the housing rehabilitation objectives in the Consolidated Plan for owner-occupied units, where there is the most demand.

Housing Rehabilitation – Rental Units: Due to the challenges of ensuring rental units remain affordable for a minimum time period, and the limited amount of funding, it is unlikely the City will be able to rehabilitate 20 rental units in the 2013-2017 Consolidated Plan time period.

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

No.

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

Not applicable.