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.

In its 2015-2019 Consolidated Plan, the City identified the following priorities:

- Increase the supply of quality affordable housing
- Improve the quality of the existing housing stock
- Reduce the impact of neglected and vacant properties
- Engage in targeted comprehensive neighborhood revitalization
- Provide housing opportunities and supportive services for the homeless
- Help all City residents meet basic social and economic needs.

A review of activities undertaken during the program year finds that in all cases CDBG, HOME, HOPWA and ESG dollars were used to address the objectives and related priorities in the Five Year Consolidated Plan. Details on all HUD expenditures and beneficiaries are provided in HUD's Integrated Disbursement Information System (IDIS). As part of leveraging, other Federally-funded, non-Federally-funded, housing-related activities are included in this CAPER.

During PY2018, the City disbursed HOME funds to multiple projects which are currently under construction, Ingleside Senior Apartments and the Village of St. John will result in approximately 88 senior rental units; Central Baptist CDC will produce 2 affordble rental units. Our Youth Inc. once completed will result in 2 units of affordable homeownership.

The City continued its work with existing CHDOs and other housing development agencies including Ministry of Caring, Our Youth, Inc. and Central Baptist CDC.

Utilizing ESG funds to serve the homeless and special needs populations, the City assisted 1333 individuals, 27 of which were veterans, 279 victims of domestic violence, 6 elderly and 152 chronically homeless. The total of ESG funds awarded to agencies were \$182,956 which provided matching and leverage funds totaling \$2,814,726.

HOPWA program funding of \$772,728 with leveraged of \$1,765,024.18 of additional funds. The total number of constituents assisted was 75 with Tenant-Based Rental Assistance, 26 with Short-term Rent and Utility Assistance, 3 with Permanent Housing Placement Services and 20 with project sponsors housing subsidy assistance. 90% of the individuals' assistance are presently in stable housing.

The Neighborhood Stabilization Program (NSP) continued to stabilize neighborhoods and stimulate local jobs. The Department of Real Estate and Housing in conjunction with its nonprofit partners developed 8 properties during PY2017. Of the 8 homeownership units sold in FY2018, 2 were redeveloped in PY2015, 3 were redeveloped in PY2016, 3 were redeveloped in PY2017 and there was no development in PY2018.

CDBG was utilized to improve the community and existing housing stock by funding multiple eligible activities. Activities included Tree Planting, Shelter Operations, Employment Training, Services for Abused and Neglected Children, Subsistence Payments, Residential Facades, Public Improvement, Fair Housing Education and Outreach, Housing Counseling, Youth activities, and Property Rehabilitation.

Comparison of the proposed versus actual outcomes for each outcome measure submitted with the consolidated plan and explain, if applicable, why progress was not made toward meeting goals and objectives. 91.520(g)

Categories, priority levels, funding sources and amounts, outcomes/objectives, goal outcome indicators, units of measure, targets, actual outcomes/outputs, and percentage completed for each of the grantee's program year goals.

Goal	Category	Source / Amount	Indicator	Unit of Measure	Expected - Strategic Plan	Actual – Strategic Plan	Percent Complete	Expected - Program Year	Actual – Program Year	Percent Complete
Expand supply of quality affordable rental housing	Affordable Housing	CDBG: \$	Rental units rehabilitated	Household Housing Unit	3	3	100.00%	5	0	0.00%
Expand supply of quality affordable rental housing	Affordable Housing	CDBG: \$	Homeowner Housing Rehabilitated	Household Housing Unit		0				

Expand supply of quality affordable rental housing	Affordable Housing	CDBG: \$	Other	Other	710250	0	0.00%			
Expand the supply of quality affordable housing	Affordable Housing	CDBG: \$ / HOME: \$	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	65	789	1,213.85%	0	5	
Expand the supply of quality affordable housing	Affordable Housing	CDBG: \$ / HOME: \$	Homeowner Housing Added	Household Housing Unit	8	14	175.00%	1	0	0.00%
Expand the supply of quality affordable housing	Affordable Housing	CDBG: \$ / HOME: \$	Homeowner Housing Rehabilitated	Household Housing Unit	5	8	160.00%	6	0	0.00%
Housing and services for the HIV/AIDS population	Non- Homeless Special Needs Non-Housing Community Development	CDBG: \$ / HOPWA: \$ / ESG: \$	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	0	20				

Housing and services for the HIV/AIDS population	Non- Homeless Special Needs Non-Housing Community Development	CDBG: \$ / HOPWA: \$ / ESG: \$	Tenant-based rental assistance / Rapid Rehousing	Households Assisted	40	218	545.00%			
Housing and services for the HIV/AIDS population	Non- Homeless Special Needs Non-Housing Community Development	CDBG: \$ / HOPWA: \$ / ESG: \$	Homeless Person Overnight Shelter	Persons Assisted		0				
Housing and services for the HIV/AIDS population	Non- Homeless Special Needs Non-Housing Community Development	CDBG: \$ / HOPWA: \$ / ESG: \$	Jobs created/retained	Jobs	1	4	400.00%			
Housing and services for the HIV/AIDS population	Non- Homeless Special Needs Non-Housing Community Development	CDBG: \$ / HOPWA: \$ / ESG: \$	Housing for People with HIV/AIDS added	Household Housing Unit	0	0		156	0	0.00%

Housing and services for the HIV/AIDS population	Non- Homeless Special Needs Non-Housing Community Development	CDBG: \$ / HOPWA: \$ / ESG: \$	HIV/AIDS Housing Operations	Household Housing Unit	14	36	257.14%	12	0	0.00%
Housing options and services for the homeless	Homeless	CDBG: \$ / ESG: \$182956	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	0	3215		0	2002	
Housing options and services for the homeless	Homeless	CDBG: \$ / ESG: \$182956	Tenant-based rental assistance / Rapid Rehousing	Households Assisted	0	170		40	0	0.00%
Housing options and services for the homeless	Homeless	CDBG: \$ / ESG: \$182956	Homeless Person Overnight Shelter	Persons Assisted	2940	1565	53.23%	300	281	93.67%
Housing options and services for the homeless	Homeless	CDBG: \$ / ESG: \$182956	Overnight/Emergency Shelter/Transitional Housing Beds added	Beds	0	0		485	0	0.00%
Housing options and services for the homeless	Homeless	CDBG: \$ / ESG: \$182956	Homelessness Prevention	Persons Assisted	215	210	97.67%	40	13	32.50%
Housing options and services for the homeless	Homeless	CDBG: \$ / ESG: \$182956	Other	Other	0	0		3432	0	0.00%

Improve the quality of the existing housing stock	Affordable Housing	CDBG: \$ / HOME: \$	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	10	0	0.00%			
Improve the quality of the existing housing stock	Affordable Housing	CDBG: \$ / HOME: \$	Homeowner Housing Rehabilitated	Household Housing Unit	85	77	90.59%	30	0	0.00%
Improve the quality of the existing housing stock	Affordable Housing	CDBG: \$ / HOME: \$	Other	Other	1	0	0.00%			
Mitigate blight from neglected/vacant properties	Affordable Housing Non-Housing Community Development	CDBG: \$ / HOME: \$	Public Facility or Infrastructure Activities for Low/Moderate Income Housing Benefit	Households Assisted	5	10	200.00%	40	0	0.00%
Mitigate blight from neglected/vacant properties	Affordable Housing Non-Housing Community Development	CDBG: \$ / HOME: \$	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	50	0	0.00%			
Mitigate blight from neglected/vacant properties	Affordable Housing Non-Housing Community Development	CDBG: \$ / HOME: \$	Homeowner Housing Rehabilitated	Household Housing Unit	85	22	25.88%			

Projects/activies for eligible youth and families	Non-Housing Community Development	CDBG: \$ / HOPWA: \$ / ESG: \$	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	15000	13767	91.78%	0	1077	
Projects/activies for eligible youth and families	Non-Housing Community Development	CDBG: \$ / HOPWA: \$ / ESG: \$	Public service activities for Low/Moderate Income Housing Benefit	Households Assisted	0	0		145	0	0.00%
Projects/activies for eligible youth and families	Non-Housing Community Development	CDBG: \$ / HOPWA: \$ / ESG: \$	Homeless Person Overnight Shelter	Persons Assisted	220	268	121.82%	0	0	
Projects/activies for eligible youth and families	Non-Housing Community Development	CDBG: \$ / HOPWA: \$ / ESG: \$	Homelessness Prevention	Persons Assisted	15	19	126.67%			

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.

The primary uses of the CDBG funds were affordable housing rehabilitation, public improvement, public services, public facilities and lead abatement controls. There were no significant changes in program objectives this year. The overall low-mod benefit for the CDBG for PY2017 was 100% which exceeds the overall 70% low-mod benefit requirement. The PR26-CDBG Financial Report is included in the Appendix Section.

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

Narrative

During the 2018 Program year, the City of Wilmington assisted 4,402 persons and families through its Federal and Non-federal funding. With CDBG funding the City assisted 4,356persons, not captured in the chart above were 44 indivuals who identified as Black/African American & White and 582 as Multi-Racial. The City assisted 1,333 persons with ESG funding, not captured above were 71 indivuals who identified as Multi-Racial. HOPWA funding provided assistance for 67 individuals; not captured above were 12 individuals who identified as Multi-Racial.

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	2,420,236	
HOME	public - federal	661,292	
HOPWA	public - federal	772,728	
ESG	public - federal	182,956	

Table 3 - Resources Made Available

Narrative

Identify the geographic distribution and location of investments

Target Area	Planned Percentage of Allocation	Actual Percentage of Allocation	Narrative Description
Browntown/Hedgeville	15	15	
DOWNTOWN AREA	10	10	
Eastside	15	15	
Northeast	20	20	
Southbridge	10	10	
West Center City	15	15	
Westside	15	15	

Table 4 – Identify the geographic distribution and location of investments

Narrative

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 Wilmington continued to give priority to the use of Federal resources to leverage other public and private funds. This is particularly true with respect to development projects, as very rarely do Federal resources cover all of the costs, particularly if the project is more than 2-3 units in size. The City of Wilmington's HOME match liability was reduced from 25% to 12.5%. The City's disbursments requiring match totaled \$113,887.07 in PY2018, accruing a match liability of 14,235.88. There was no Match contribution during PY2018. There was \$484,614 in available HOME match at the start of PY2018. The City of Wilmington's Housing Strategic Funds were prior year funds apprioriated from the Administrative and Legislative bodies of local government. All local funds were expended during the PY2018. The City expended \$791,500 to leverage federal, state and local funds.

Fiscal Year Summary – HOME Match	
1. Excess match from prior Federal fiscal year	0
2. Match contributed during current Federal fiscal year	0
3. Total match available for current Federal fiscal year (Line 1 plus Line 2)	0
4. Match liability for current Federal fiscal year	0
5. Excess match carried over to next Federal fiscal year (Line 3 minus Line 4)	0

Table 5 – Fiscal Year Summary - HOME Match Report

	Match Contribution for the Federal Fiscal Year											
Project No. or Other ID	Date of Contribution	Cash (non-Federal sources)	Foregone Taxes, Fees, Charges	Appraised Land/Real Property	Required Infrastructure	Site Preparation, Construction Materials, Donated labor	Bond Financing	Total Match				

Table 6 – Match Contribution for the Federal Fiscal Year

HOME MBE/WBE report

Program Income – Enter the program amounts for the reporting period									
Balance on hand at begin- ning of reporting period \$	Amount received during reporting period \$	Total amount expended during reporting period \$	Amount expended for TBRA \$	Balance on hand at end of reporting period					
0	0	0	0	0					

Table 7 – Program Income

Minority Business Enterprises and Women Business Enterprises – Indicate the number and dollar value of contracts for HOME projects completed during the reporting period

	Total		Minority Busin	ess Enterprises		White Non-
		Alaskan Native or American Indian	Asian or Pacific Islander	Black Non- Hispanic	Hispanic	Hispanic
Contracts	1					
Dollar						
Amount	0	0	0	0	0	0
Number	0	0	0	0	0	0
Sub-Contract	ts					
Number	0	0	0	0	0	0
Dollar						
Amount	0	0	0	0	0	0
	Total	Women Business Enterprises	Male			
Contracts						
Dollar						
Amount	0	0	0			
Number	0	0	0			
Sub-Contract	ts					
Number	0	0	0			
Dollar						

0 Table 8 - Minority Business and Women Business Enterprises

Amount

Minority Owners of Rental Property – Indicate the number of HOME assisted rental property owners and the total amount of HOME funds in these rental properties assisted

0

	Total	Minority Property Owners			White Non-	
		Alaskan Native or American Indian	Asian or Pacific Islander	Black Non- Hispanic	Hispanic	Hispanic
Number	0	0	0	0	0	0
Dollar						
Amount	0	0	0	0	0	0

Table 9 - Minority Owners of Rental Property

Relocation and Real Property Acquisition – Indicate the number of persons displaced, the cost of relocation payments, the number of parcels acquired, and the cost of acquisition

Parcels Acquired	0	0
Businesses Displaced	0	0
Nonprofit Organizations		
Displaced	0	0
Households Temporarily		
Relocated, not Displaced	0	0

Households	Total		Minority Property Enterprises			White Non-
Displaced		Alaskan Native or American Indian	Asian or Pacific Islander	Black Non- Hispanic	Hispanic	Hispanic
Number	0	0	0	0	0	0
Cost	0	0	0	0	0	0

Table 10 – Relocation and Real Property Acquisition

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	7,450	0
Number of Non-Homeless households to be		
provided affordable housing units	950	0
Number of Special-Needs households to be		
provided affordable housing units	120	0
Total	8,520	0

Table 11 - Number of Households

	One-Year Goal	Actual
Number of households supported through		
Rental Assistance	10	0
Number of households supported through		
The Production of New Units	50	0
Number of households supported through		
Rehab of Existing Units	40	0
Number of households supported through		
Acquisition of Existing Units	0	0
Total	100	0

Table 12 - Number of Households Supported

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

Overall the City of Wilmington met or exceeded its goals for Year-One. The total households assisted were through the CDBG, ESG, HOME and HOPWA programs.

Discuss how these outcomes will impact future annual action plans.

The City will continue its work with nonprofit and for-profit housing developers to increase the availability of affordable housing that is decent, safe, sanitary and accessible. In an effort to leverage shrinking federal dollars, the City is aggressively seeking to attract increased housing and economic development initiatives through partnerships and incentives with for-profit developers. The City has begun a more focused effort to target "redevelopment" areas in the community, primarily utilizing the Five-Year Consolidated Plan, the Statewide Analysis of Impediments of Fair Housing Choice and the City's Comprehensive Plan and recently completed Market Value Analysis done by The Reinvestment Fund.

The City is partnering with strong community serving organizations whose familiarity with and commitment to the city's neighborhoods will go a long way toward ensuring that projects are completed to the highest positive impact for residents in need. It is this bringing together of community serving organizations, and of focused financial and institutional investments by the City, the Wilmington Neighborhood Conservancy Land Bank, State agencies and the private sector, that will make possible the important work of addressing blight, stabilizing communities and catalyzing additional investment at the neighborhood level.

The mission of the Wilmington Neighborhood Conservancy Land Bank (WNCLB) is to return vacant, dilapidated, abandoned, and delinquent properties to productive use in order to strengthen and revitalize neighborhoods and spur economic development. They accomplish this mission in a way that is purposeful, transparent, and for the public good. The coordination of resources and efforts within and between governments, community organizations, and the private sector and is both economically efficient and sustainable. The work also reflects the goals and objectives of the City's comprehensive development plan and invests in existing neighborhoods.

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	0	0
Low-income	0	0
Moderate-income	0	0
Total	0	0

Table 13 - Number of Households Served

Narrative Information

The majority of activities continue to be in predominately low and moderate-income areas. Many of the services are citywide in nature, and accessible to all parts of the city because of the small size of the community. The Low/Mod areas are also synonymous with areas of high minority concentration.

CR-25 - Homeless and Other Special Needs 91.220(d, e); 91.320(d, e); 91.520(c)

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

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

The City of Wilmington plays an integral role in ensuring that homeless assistance programs continue to serve those with the most need in the City of Wilmington with the limited resources that are available. One of the City's priorities has been to ensure a seamless continuum of care for all homeless persons. This priority is met by coordinating and collaborating with providers of homeless prevention, coordinated intake, emergency shelters, transitional housing, and rapid re-housing services well as the active role that the City plays in the Continuum of Care planning process as facilitated by the Homeless Planning Council of Delaware and the work of the Delaware Interagency Council on Homelessness.

Housing Alliance DE serves as the statewide lead agency for Delaware's Continuum of Care and the system administrator for the statewide Homeless Management Information System (HMIS). The City participates in the CoC's planning process by participating in meetings, collaborating with Housing Alliance DE on funding and advocacy issues and ensuring Delaware's HMIS system is operational. As a result of the 2018 Continuum of Care application process, Delaware was awarded \$8.3 million from HUD in the Continuum of Care funding competition. Funds were awarded to 8 agencies and 32 programs to assist the homeless population. Delaware's HMIS system has been expanded since its inception in 2001 from a pilot group of 6 agencies to 32 agencies and over 120 users in 2016. From October 1, 2017 to September 31, 2018 data was entered into HMIS for a total of 3,112 unduplicated people served by emergency shelter and transitional housing programs in Delaware. Additional client data was also entered for households served by rapid re-housing, permanent supportive housing, and homeless outreach programs.

The City of Wilmington is an active and voting member on the Delaware Continuum of Care Board. In 2018 the Delaware CoC Board led the CoC in a planning process, and developed a 2-year Action Plan to End Homelessness. This plan is was formally released in October 2017, and implemented by the CoC membership, CoC committees, CoC Board, and CoC Lead agency.

The City of Wilmington continues to work closely with the CoC Lead agency in Delaware to develop standard performance measures for homeless assistance projects in the state that can be measured in HMIS, and also helped to finalize formal rapid re-housing standards for Delaware.

Delaware has a PATH Outreach provider, funded through SAMHSA, administered by the Department of Health and Social Services, and operated by the Rick Van Story Resource Center. The PATH Outreach project operates statewide throughout Delaware, with a City of Wilmington dedicated outreach worker. Their role is to outreach to unsheltered homeless households, assess their housing and service need,

and work collaboratively with partner agencies to connect these clients to homeless assistance resources.

PATH Outreach participates in Delaware's coordinated entry system, Centralized Intake, by conducting the VI-SPDAT assessment for the people they work with, and helping to document the chronically homeless status of clients in need of permanent supportive housing.

Addressing the emergency shelter and transitional housing needs of homeless persons

Delaware has a statewide coordinated entry system, Centralized Intake. If households are in need of emergency shelter they contact Centralized Intake by calling CI directly, calling 2-1-1 to be connected, or visiting a state service center, of which there are 15 statewide. Clients are assessed for literal homelessness and referred same-day to available emergency shelter beds throughout Delaware. Any households in need of shelter in Wilmington contacts Centralized Intake for assessment and referral. Households that are currently unsheltered are prioritized for shelter assistance.

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

Households that are in need of homeless prevention resources are directed by Delaware 2-1-1 and Centralized Intake to contact the following agencies for assistance, Catholic Charities, Lutheran Community Services, WestEnd Neighborhood House and First State Community Action. The Delaware CoC hosted training in 2015 on homeless diversion, a front door homeless prevention program model that seeks to help keep households from entering shelter whenever possible. A diversion pilot program was implemented in the City of Wilmington in 2015/2016 to gather data and information about how to operationalize homeless diversion in Delaware. After reviewing the data and its successes, the Delaware CoC and its partners implemented another Diversion Pilot program in 2018 as a part of the Delaware CoC's Action plan.

Centralized Intake in Delaware also has a policy that it will not allow discharges from institutions into homelessness unless all other discharge plans and housing avenues have been pursued. Delaware's 15 state service centers also work directly with low-income households in communities receiving assistance, and work to

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

In 2015, the Delaware CoC implemented a rapid re-housing (RRH) performance improvement project with RRH agencies in Delaware, a number of whom are funded for RRH through City of Wilmington with ESG funds. The goal of the project was to better understand the outcomes of RRH in Delaware and provide direct technical assistance to providers of RRH to help them better be able to rapidly re-house homeless families and individuals, shortening their length of time homeless and providing them with appropriate in-home case management support to remain stably housed. Two full-day trainings were provided along with 1-on-1 technical assistance by a contracted consultant. The CoC Lead Agency produced an annual report on RRH outcomes in Delaware for FY2017, and will be doing the same for FY2018. Referrals to RRH are coordinated through Centralized Intake, with the goal of helping households quickly access this housing resource.

Delaware also coordinates closely with the VA's SSVF and HUD-VASH programs to rapidly re-house veterans and veteran families. The HMIS lead agency manages a statewide by-name master list of homeless veterans. The list is reviewed by-weekly with statewide homeless assistance providers and any newly homeless veteran is connected/referred immediately to SSVF to ensure quick enrollment and access to housing. Any chronically homeless veteran is referred to HUD VASH or CoC permanent supportive housing.

Delaware's coordinated entry program, Centralized Intake, keeps a by-name list of chronically homeless individuals and families in Delaware. The list is prioritized by severity of service need and length of time homeless, prioritizing the longest stayers and highest need households for CoC permanent supportive housing assistance.

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

Actions taken to address the needs of public housing

See Attachment 1

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

RESIDENT SERVICES

Wilmington Housing Authority (WHA) continues to provide residents access to a wide variety of programs and services through strategic partnerships with many agencies. Our Resident Services staff provides case management services to our Public Housing participants through the Resident Opportunities for Self-Sufficiency (ROSS) program and for our Housing Choice Voucher participants through the Family Self-Sufficiency (FSS) program. The purpose of the ROSS and FSS programs is to coordinate housing assistance with public and private resources to enable assisted families to achieve economic self-sufficiency. For participants in the self-sufficiency programs, the duration to meet their goals is five years, during which they identify educational, professional and personal goals including but not limited to:

- Educational advancement (e.g. GED or post secondary)
- Supportive services
- Completion of specialized job training
- Employment
- Career advancement
- Transitioning our of subsidized housing into homeownership

Wilmington Housing Authority continues to operate its "One-Stop-Shop" (OSS) for resident services on the ground floor of the Crestview site in FY17. More than 15 service providers utilize the space including the Workforce Investment Board, SNAP Program and a variety of non-profit organizations.

Current services provided at the OSS include:

- Resume Writing Workshops
- Clothing Boutique
- Job Link/Job Search
- Financial Management

- Workforce Readiness Training Workshops
- Housing Counseling
- Basic Computers and Intro to Social Media
- Fresh Start- Foreclosure and Financial Repair

The major goal of the "One-Stop-Shop" is to assist our WHA population with services and resources in one centralized area. Its overall mission is to serve as a catalyst for change for the achievement of "self-sufficiency" for all WHA residents as well as residents that reside in the City of Wilmington.

Actions taken to provide assistance to troubled PHAs

WHA is not a troubled PHA

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)

With 17 of 26 census tracts in the City of Wilmington either impacted or highly impacted by minority concentration, the City recognizes the challenges it faces in expanding fair housing choice to less dense areas of opportunity where traditionally, the cost of land acquisition and community opposition make affordable housing development extremely difficult. The City continued to move forward with many projects and programs to help overcome existing barriers to affordable housing, including working with area CHDOs and other developers to find suitable sites for infill development of affordable rental and owner housing projects.

The City will continue to move forward with projects and programs that help to overcome existing barriers to affordable housing, including working with Community Housing Development Organizations, the Wilmington Neighborhood Conservancy Land Bank and developers to find suitable sites for infill development of affordable rental and owner housing projects. The City will continue with its various acquisition, demolition, and clearance programs to prepare sites for future development.

To address the lack of available land, the City will continue its involvement in planning for the reuse of environmentally contaminated land or Brownfields with the potential for remediation redevelopment as housing.

The City's building code recently incorporated flexible provisions for rehabilitation of existing structures. There is sufficient zoning for multi-family housing and the amount of this area exceeds demand. The City has a tax rebate program and fee waiver program for new construction and rehab of affordable residential properties to encourage redevelopment in target areas.

To address the lack of available land the City is actively involved in planning for the reuse of environmentally contaminated land or Brownfields with the potential for remediation redevelopment as housing.

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

For the past two years, the City of Wilmington's Department of Real Estate and Housing, Department of Planning and Urban Design, and many participants from the local banking communities have been working in conjunction with the Wilmington Neighborhood Conservancy Land Bank (WNCLB). Since its inception, the WNCLB has been aggressively acquiring the City's vacant property inventory and has

conducted multiple large-scale demolition projects. The goal of developing an entity that has the tools to address blight and vacancy in the City of Wilmington is still a work in progress but the collaboration of the aforementioned entities is proving effective. The Land Bank was legislated by the State of Delaware and City Council has been named the Wilmington Neighborhood Conservancy Land Bank Corporation (WNCLBC).

A great deal of research was done, including looking at models currently being used in a numbers of cities, attending conferences and seminars to learn best practices and incorporating the use of lands banks.

Funding required to initially operate the Land Bank has been secured and some additional funding has been acquired by the WNCLB. Continual efforts are being made to target additional resources. The City of Wilmington as thus far committed more than \$2 million to the WNCLB.

The City has identified additional funding sources that can be used to contribute to the Wilmington Neighborhood Conservancy Land Bank's ability to stabilize or demolish properties as we move forward to address the issues surrounding vacant and abandoned parcels throughout the city.

Wilmington is focusing on addressing unemployment, job training, job creation and retention. The City, in cooperation with our Federal Delegation, the Delaware State Housing Authority, the Wilmington Housing Authority, various affordable housing agencies, community development corporations and the Wilmington Neighborhood Conservancy Land Bank will be focused on finding pathways for poverty level families to become homeowners throughout the city's neighborhoods. Plans call for increasing access to low interest lending, expanding lease to purchase and live where you work programs, and reestablishing Wilmington's urban homesteading program. These actions will afford Wilmington's poverty level families the opportunity to acquire equity while building stronger, economically diverse neighborhoods

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

The City will recertify four (4) staff members who were State Certified for Lead Inspector and Risk Assessor. Issues of lead paint contamination identified during initial visual inspections conducted by City staff will be addressed. The City has applied to HUD for funding to address lead paint in existing structures.

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

Wilmington is focused on addressing unemployment, job training, job creation and retention. The City, in cooperation with our Federal Delegation, the Delaware State Housing Authority, the Wilmington Housing Authority, and various affordable housing agencies, community development corporations and the Wilmington Neighborhood Conservancy Land Bank will be focused on finding pathways for poverty level families to become homeowners throughout the city's neighborhoods. Plans call for increasing access to low interest lending, expanding lease to purchase and live where you work

programs, and reestablishing Wilmington's urban homesteading program. These actions will afford Wilmington's poverty level families the opportunity to acquire equity while building stronger, economically diverse neighborhoods.

The City, through its various departments and commissions, will continue to advocate for improved transportation alternatives, to support organizations that provide job training and placement services, to support crime awareness and prevention activities, to support homeless prevention activities, and to preserve and improve affordable housing options, as part of its strategy to prevent and alleviate poverty Annual Action Plan in the City of Wilmington.

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

The City's Integrated Planning Process Team has taken the lead role in coordinating the planning and implementation of affordable housing programs to benefit city residents. While the City leads the strategy development, many private and public, for-profit and not-for-profit organizations, as well as citizens of Wilmington, are actively involved in the development of the strategy.

The City has specifically reached out to other organizations that provide services, including crisis alleviation to prevent homelessness, to low income individuals and families.

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

The City of Wilmington continued its partnership with various non-profit/for profit organizations giving the City the ability to leverage additional non-governmental funds for affordable housing development, neighborhood revitalization strategies while increasing the City's capacity to produce large-scale housing in a timely manner.

A Memorandum of Agreement with the Wilmington Housing Authority to conduct mutually beneficial joint acquisitions, development and planning activities, remained in effect during PY2018.

The City continued its work with existing CHDOs and other housing development agencies including Interfaith Housing Development, Cornerstone West, Habitat for Humanity, Ministry of Caring and Neighborhood House.

The City is engaged in the Governor's Delaware Interagency Council on Homelessness which local government work collectively to enchance services for Homeless, Veterans and social services statewide.

Identify actions taken to overcome the effects of any impediments identified in the jurisdictions analysis of impediments to fair housing choice. 91.520(a)

FY2018 the City is actively involved in the Assessment of Fair Housing, a state-wide collaboration of all federally funded grantees and Public Housing Authorities. This group is meeting monthly to strategize and collaborate on the submission of the regional AFH that is due October 2019.

To affirmatively further fair housing and expand affordable housing opportunities on a regional level, the City will continue to provide financial support to the statewide Delaware Housing Search website that was established in 2012. This website provides real time search and availability of affordable and accessible housing. In FY2018, the site saw approximately 4,000 visitors each week and more than one million-page views, due to a complete redesign of the website and increased partnerships.

The City of Wilmington follows guidelines to affirmatively further affordable housing through its affirmative marketing program. This set of guidelines used to operate its HOME Investment Partnership Program, a copy of the policy is available for public inspection at the City of Wilmington's Department of Real Estate and Housing.

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 City's comprehensive monitoring system consists of a written monitoring handbook, file and monitoring checklists for each project type administered by City staff, who work administratively with each Federal program. During PY2018, the City of Wilmington monitored 3 of its 4 HOPWA projects. Based upon the results of the monitoring completed by the City with HUD, the City has made significant changes to its program.

The City will be completing monitoring of the CDBG and ESG projects in the forthcoming months. However, the City has completed desk audits of all draw requests to ensure compliance with the applicable regulations and activity requirements.

It is the City's standard monitoring practice for all programs whose monitoring is not determined by regulation, to conduct a site visit if the following:

- 1. If the project receives \$25,000 or more in funding annually; it is automatically monitored that year.
- 1. IF the project has not been consistently funded for more than two consecutive years; it is automatically monitored that year.
- 1. And if the project has findings in its annual audit, changes in program management and/or requires technical assistance, then it is automatically monitored that year.

The HOME Program Administrator received Annual income/rent determinations during the annual monitoring visit; there are a total of 123 units of rental housing of which 50 HOME/NSP units were reviewed; a trained Rehabilitation Specialist inspected those same units for compliance with City Housing Code Standards. There were 37 units that had deficiencies and were scheduled for reinspection and corrective actions.

All completed housing construction projects must meet City of Wilmington Housing Code Inspection standards and receive a certificate of occupancy before being inhabited. As part of ongoing, long-term HOME compliance, all units are monitored annually for tenant income determination eligibility in conjunction with HOME rents. City of Wilmington HOME monitoring inspections are conducted every one to three years, according to the number of units in the project.

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 draft PY2018 Consolidated Annual Peformance and Evaluation Report (CAPER) was made available to the public for the required 15-day comment period in News Paper on September 17, 2019 to October 1, 2019. In addition, the Department sent notice to Neighborhood Planning Council and Civic Associations and the City provided notice via its social media platform (Twitter, Facebook, Instagram).

The advertisement gave a description of the CAPER, the information contained in the report, and the purpose of its submission to U.S. Department of Housing and Urban Development. Additionally, an explanation was provided of the 15 day comment period, its associated dates, and assurance that all written comments would be reviewed and considered prior to submission of the report to HUD. The expected submission date was published to further informed citizens of the time limits involved in commenting on the contents of the report.

Copies of the CAPER were available for review at the Department of Real Estate and Housing and the City of Wilmington's Neighborhood Planning Committees were email the notice information. A draft copy of the CAPER was available on the City's website at www.WilmingtonDE.gov/caper.

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.

There is no change in the Jurisdiction's program objectives in PY2018.

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

No

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

CR-50 - HOME 91.520(d)

Include the results of on-site inspections of affordable rental housing assisted under the program to determine compliance with housing codes and other applicable regulations

Please list those projects that should have been inspected on-site this program year based upon the schedule in §92.504(d). Indicate which of these were inspected and a summary of issues that were detected during the inspection. For those that were not inspected, please indicate the reason and how you will remedy the situation.

Please list those projects that should have been inspected on-site this program year based upon the schedule in §92.504(d). Indicate which of these were inspected and a summary of issues that were detected during the inspection. For those that were not inspected, please indicate the reason and how you will remedy the situation.

The following units were inspected and passed with no issues:

Sacred Heart II (11 units)

Clayton Court – (6 unit)

Compton Court (9 units)

The following units initially failed but passed upon reinspection:

Cornerstone West Lifelines (5 units) - 4 failed: filters

The following units failed and are scheduled for reinspection:

WHA Kennedy Towers (24 units) Filters

Jazz Court (11 units) Filters, duct work - condensation

River Commons (11 units) 2 failed - sticking door, hole in ceiling)

Provide an assessment of the jurisdiction's affirmative marketing actions for HOME units. 92.351(b)

The City of Wilmington operates its HOME Investment Partnership Program using the following policies and procedures:

1. The City of Wilmington requires every applicant to sign an agreement containing the following language: This is to certify that to the extent there are vacant units and properties being rehabilitated

through the HOME Program, those units will be marketed in an affirmative manner to attract tenants, regardless of sex, of all minority and majority groups.

- 2. The City, in marketing the program, informs all potential participants in the application packet that they must conform to affirmative marketing requirements, if they are selected to participate in the program.
- 3. Owners are referred to the Wilmington Housing Authority to solicit names of eligible tenants from their waiting list. In addition, as a next step, they should contact New Castle County for names of persons seeking rental housing.
- 4. The City will evaluate each owner or developer's performance immediately following occupancy of the unit. Owners and developers found noncompliant with HOME Affirmative Marketing requirements face the penalties, including repayment of loans before the sale of unit(s), higher interest charges, change status of a grant to a loan, disqualification from future Federal funding and possible loss of the property, if after notification by the City of Wilmington, efforts to correct identified areas of noncompliance are unsuccessful."

The City of Wilmington took all steps to provide outreach to minorities and other underserved populations through affirmative marketing efforts.

The City of Wilmington has updated its HOME Policies and Procedures Manual. It includes a detail procedure manual for monitoring.

Refer to IDIS reports to describe the amount and use of program income for projects, including the number of projects and owner and tenant characteristics

The City received \$205,000 in HOME program income in FY18. The funds are being used by the WHA/Pennrose to develop rental housing in Wilmington's NE neighborhood through a LIHTC award. Income will be low to low/moderate.

Describe other actions taken to foster and maintain affordable housing. 91.220(k) (STATES ONLY: Including the coordination of LIHTC with the development of affordable housing). 91.320(j)

Funding through the Neighborhood Stabilization Program (NSP) remained the primary means for development of for-sale affordable housing. By using NSP funds to pay for all of the development costs (and keeping all the sales proceeds in return) the City has been able to reduce development risks for participating developers, which has resulted in dozens of eligible properties being acquired and renovated, many targeted to households below 50% of area median. In an effort to increase availability of market-rate housing, the City leveraged its federal allocation with local funds to provide a housing mix that appeals to a more diverse group of buyers.

The City's CDBG Rehabiliation Program increases and improves the quality of life and supply of affordable housing. The program provides deferred loans to qualified home-owners to address safety, code and system issues.

Community Housing Development Organizations (CHDOs) apply for funding to build, rehabilitate, renovate and affordable housing.

CR-55 - HOPWA 91.520(e)

Identify the number of individuals assisted and the types of assistance provided

Table for report on the one-year goals for the number of households provided housing through the use of HOPWA activities for: short-term rent, mortgage, and utility assistance payments to prevent homelessness of the individual or family; tenant-based rental assistance; and units provided in housing facilities developed, leased, or operated with HOPWA funds.

Number of Households Served Through:	One-year Goal	Actual
Short-term rent, mortgage, and utility assistance		
to prevent homelessness of the individual or		
family	25	0
Tenant-based rental assistance	100	0
Units provided in permanent housing facilities		
developed, leased, or operated with HOPWA		
funds	12	0
Units provided in transitional short-term housing		
facilities developed, leased, or operated with		
HOPWA funds	10	0

Table 14 - HOPWA Number of Households Served

Narrative

HOPWA funding was utilized primarily for operations and supportive services for homeless, supportive services facility, case management, tenant-based rental assistance, and short-term rental and utility assistance. All client assistance met the verification requirement guidelines. For additional information, refer to the appendices for the HOPWA Caper.

The HOPWA Caper was submitted to HUD HOPWA HQ and HUD Philadelphia Regional Office via email.

CR-60 - ESG 91.520(g) (ESG Recipients only)

ESG Supplement to the CAPER in e-snaps

For Paperwork Reduction Act

1. Recipient Information—All Recipients Complete

Basic Grant Information

Recipient Name WILMINGTON
Organizational DUNS Number 067393900
EIN/TIN Number 510176414
Indentify the Field Office PHILADELPHIA

Identify CoC(s) in which the recipient or subrecipient(s) will provide ESG assistance

ESG Contact Name

Prefix Mr
First Name Alan
Middle Name J
Last Name Matas

Suffix 0

Title Senior Program Director

ESG Contact Address

Street Address 1 800 French St, 7th Flr

Street Address 2 0

City Wilmington

 State
 DE

 ZIP Code
 19801

 Phone Number
 3025763021

Extension 0
Fax Number 0

Email Address ajmatas@wilmingtonde.gov

ESG Secondary Contact

Prefix Ms

First Name SHAMIKA
Last Name PONZO

Suffix 0

Title Director of Rehab Division

Phone Number 3025763013

Extension 0

Email Address SPONZO@WILMINGTONDE.GOV

2. Reporting Period—All Recipients Complete

Program Year Start Date 07/01/2018
Program Year End Date 06/30/2019

3a. Subrecipient Form – Complete one form for each subrecipient

Subrecipient or Contractor Name: YWCA OF DELAWARE, INC

City: Wilmington

State: DE

Zip Code: 19801, 6612 **DUNS Number:** 364131870

Is subrecipient a victim services provider: N

Subrecipient Organization Type: Other Non-Profit Organization

ESG Subgrant or Contract Award Amount: 77004

Subrecipient or Contractor Name: Housing Alliance Delaware

City: Wilmington

State: DE

Zip Code: 19801, 6604 **DUNS Number:** 137232653

Is subrecipient a victim services provider: N

Subrecipient Organization Type: Other Non-Profit Organization

ESG Subgrant or Contract Award Amount: 40076

Subrecipient or Contractor Name: Family Promise of Northern New Castle County

City: Wilmington

State: DE

Zip Code: 19808, 5225 **DUNS Number:** 831572933

Is subrecipient a victim services provider: N

Subrecipient Organization Type: Faith-Based Organization

ESG Subgrant or Contract Award Amount: 17093

Subrecipient or Contractor Name: The Salvation Army

City: Wilmington

State: DE

Zip Code: 19801, 2221 **DUNS Number:** 062517941

Is subrecipient a victim services provider: N

Subrecipient Organization Type: Faith-Based Organization

ESG Subgrant or Contract Award Amount: 15023

Subrecipient or Contractor Name: MINISTRY OF CARING - HOPE HOUSE I

City: Wilmington

State: DE

Zip Code: 19806, 4605 **DUNS Number:** 094346681

Is subrecipient a victim services provider: N

Subrecipient Organization Type: Faith-Based Organization

ESG Subgrant or Contract Award Amount: 20038

CR-65 - Persons Assisted

4. Persons Served

4a. Complete for Homelessness Prevention Activities

Number of Persons in Households	Total
Adults	0
Children	0
Don't Know/Refused/Other	0
Missing Information	0
Total	0

Table 16 – Household Information for Homeless Prevention Activities

4b. Complete for Rapid Re-Housing Activities

Number of Persons in	Total
Households	
Adults	0
Children	0
Don't Know/Refused/Other	0
Missing Information	0
Total	0

Table 17 – Household Information for Rapid Re-Housing Activities

4c. Complete for Shelter

Number of Persons in Households	Total
Adults	0
Children	0
Don't Know/Refused/Other	0
Missing Information	0
Total	0

Table 18 – Shelter Information

4d. Street Outreach

Number of Persons in	Total
Households	
Adults	0
Children	0
Don't Know/Refused/Other	0
Missing Information	0
Total	0

Table 19 - Household Information for Street Outreach

4e. Totals for all Persons Served with ESG

Number of Persons in Households	Total
Adults	0
Children	0
Don't Know/Refused/Other	0
Missing Information	0
Total	0

Table 20 - Household Information for Persons Served with ESG

5. Gender—Complete for All Activities

	Total
Male	0
Female	0
Transgender	0
Don't Know/Refused/Other	0
Missing Information	0
Total	0

Table 21 – Gender Information

6. Age—Complete for All Activities

	Total
Under 18	0
18-24	0
25 and over	0
Don't Know/Refused/Other	0
Missing Information	0
Total	0

Table 22 – Age Information

7. Special Populations Served—Complete for All Activities

Number of Persons in Households

Subpopulation	Total	Total Persons Served – Prevention	Total Persons Served – RRH	Total Persons Served in Emergency Shelters
Veterans	0	0	0	0
Victims of Domestic				
Violence	0	0	0	0
Elderly	0	0	0	0
HIV/AIDS	0	0	0	0
Chronically Homeless	0	0	0	0
Persons with Disabilit	Persons with Disabilities:			
Severely Mentally				
III	0	0	0	0
Chronic Substance				
Abuse	0	0	0	0
Other Disability	0	0	0	0
Total				
(Unduplicated if				
possible)	0	0	0	0

Table 23 – Special Population Served

CR-70 – ESG 91.520(g) - Assistance Provided and Outcomes

10. Shelter Utilization

Number of New Units - Rehabbed	0
Number of New Units - Conversion	0
Total Number of bed-nights available	0
Total Number of bed-nights provided	0
Capacity Utilization	0.00%

Table 24 – Shelter Capacity

11. Project Outcomes Data measured under the performance standards developed in consultation with the CoC(s)

- **1. Bed Utilization Rates** This measure is produced for Emergency Shelter [ES], Transitional Housing [TH], and Permanent Supportive Housing [PSH]. This measure helps us to understand the capacity at which homeless assistance resources are being utilized in our communities.
- **2. Rate of Exits to Destination Types** This measure is calculated for ES and TH programs for the purpose of providing information about where people go after being served.
- **3.** Rate of Exits to Permanent Housing This measure is calculated for ESs, TH programs, and Rapid Re-Housing programs. This measure helps us to understand the extent to which certain projects and project types are successfully connecting clients to permanent housing resources in our community.
- **3. Rate of Retention** This measure is calculated for PSH projects to measure the extent to which clients are stabilizing in PSH projects for 1 year or more.
- **4. Average Length of Stay in Project** This measure is calculated for ESs and TH projects to help us understand the length of time that clients are staying in homeless assistance projects in our community. This measure looks at the clients who exited the project during the report period. For all of the clients that exited, the total number of days that they stayed in the project is calculated using entry dates and exit dates.
- **5.** Rate of Adult Clients Served with a Disabling Condition This measure is calculated for all project types to help us understand the extent to which certain projects or project types are serving clients with highest levels of need.

6. Total number of Unduplicated Households Served This measure is calculated for all project types. This measure helps us to understand how many people are being served by our homeless assistance projects.

CR-75 – Expenditures

11. Expenditures

11a. ESG Expenditures for Homelessness Prevention

	Dollar Amount of Expenditures in Program Year		
	2016	2017	2018
Expenditures for Rental Assistance	0	0	0
Expenditures for Housing Relocation and			
Stabilization Services - Financial Assistance	0	0	0
Expenditures for Housing Relocation &			
Stabilization Services - Services	0	0	0
Expenditures for Homeless Prevention under			
Emergency Shelter Grants Program	0	0	0
Subtotal Homelessness Prevention	0	0	0

Table 25 – ESG Expenditures for Homelessness Prevention

11b. ESG Expenditures for Rapid Re-Housing

	Dollar Amount of Expenditures in Program Year		
	2016	2017	2018
Expenditures for Rental Assistance	0	0	0
Expenditures for Housing Relocation and			
Stabilization Services - Financial Assistance	0	0	0
Expenditures for Housing Relocation &			
Stabilization Services - Services	0	0	0
Expenditures for Homeless Assistance under			
Emergency Shelter Grants Program	0	0	0
Subtotal Rapid Re-Housing	0	0	0

Table 26 - ESG Expenditures for Rapid Re-Housing

11c. ESG Expenditures for Emergency Shelter

	Dollar Amount of Expenditures in Program Year		
	2016	2017	2018
Essential Services	0	0	0
Operations	0	0	0
Renovation	0	0	0

Major Rehab	0	0	0
Conversion	0	0	0
Subtotal	0	0	0

Table 27 – ESG Expenditures for Emergency Shelter

11d. Other Grant Expenditures

	Dollar Amount of Expenditures in Program Year		
	2016	2017	2018
Street Outreach	0	0	0
HMIS	0	0	0
Administration	0	0	0

Table 28 - Other Grant Expenditures

11e. Total ESG Grant Funds

Total ESG Funds Expended	2016	2017	2018
	0	0	0

Table 29 - Total ESG Funds Expended

11f. Match Source

	2016	2017	2018
Other Non-ESG HUD Funds	0	0	0
Other Federal Funds	0	0	0
State Government	0	0	0
Local Government	0	0	0
Private Funds	0	0	0

Other	0	0	0
Fees	0	0	0
Program Income	0	0	0
Total Match Amount	0	0	0

Table 30 - Other Funds Expended on Eligible ESG Activities

11g. Total

Total Amount of Funds Expended on ESG Activities	2016	2017	2018
	0	0	0

Table 31 - Total Amount of Funds Expended on ESG Activities