

2021 ANNUAL ACTION PLAN



DEPARTMENT OF REAL ESTATE AND HOUSING
800 N. French Street, 7th Floor, Wilmington, DE 19801

Executive Summary

AP-05 Executive Summary - 24 CFR 91.200(c), 91.220(b)

1. Introduction

Annually, the City of Wilmington develop its Action Plan to describe the planned investment of federal resources to implement specific activities related to the goals and priorities of the Consolidated Plan. The Consolidated Plan (Con Plan) is mandated by federal law and regulations promulgated by the U.S. Department of Housing and Urban Development (HUD) in order for the City to receive federal funding for affordable housing and community development initiatives benefitting primarily low- and moderate-income persons.

The purpose of the plan is to:

- To provide decent housing by preserving the affordable housing stock, increasing the availability of affordable housing, reducing discriminatory barriers, increasing the supply of supportive housing for those with special needs, and transitioning homeless persons and families into housing.
- To provide a suitable living environment through safer, more livable and accessible neighborhoods, greater integration of low- and moderate-income residents throughout the City, increased housing opportunities, and reinvestment in aging neighborhoods.
- To expand economic opportunities through job creation, homeownership opportunities, façade improvement, development activities that promote long-term community viability and the empowerment of low- and moderate-income persons to achieve self-sufficiency.

The City of Wilmington anticipates receiving the following grant amounts in fiscal year 2021:

- CDBG: \$2,219,037
- HOME: \$579,619
- ESG: \$189,070
- HOPWA: \$824,463

2. Summarize the objectives and outcomes identified in the Plan

As assessed in the 2020-2024 Consolidated Plan, housing needs among residents of the City of Wilmington were determined by analyzing housing problems by income level, tenure, and households with special needs. For the Con Plan, sources included the Comprehensive Housing Affordability Strategy (CHAS) dataset, which is based on the 2011-2015 American Community Survey Five-Year Estimates. This source analyzes households with one or more housing problems (overcrowding, lacking adequate kitchen or plumbing facilities), and households experiencing cost burden and severe cost burden.

The most significant housing issue identified was cost burdened, defined as spending between 30-50% of household income on housing costs such as mortgage and rent payments, and severe cost-burden, defined as households spending more than 50% of their income on housing costs. According to CHAS data, 39.2% of households in the City are cost burdened, particularly households with incomes between 30-80% AMI. An even higher proportion of Wilmington households are severely cost-burdened, consisting 20.8% of households, particularly households with incomes between 0-50% AMI.

To address the identified housing needs, the City has established the following goals and outcomes to be achieved through the investment of its CDBG and HOME resources in fiscal year 2021:

Goal Name	Goal Outcome Indicator
Improve quality of existing housing stock	Homeowner Housing Added: 10 housing units Homeowner Housing Rehabilitated: 45 housing units
Increase supply of existing housing stock	Rental Units Constructed: 108 housing units Homeowner Housing Added: 18 housing units
Improve public infrastructure	Public Facility or Infrastructure for Low/Moderate Income Housing Benefit: 102 households
Improve public facilities	Not funded this year
Provide housing/services to the homeless and near-homeless population	Public Facility or Infrastructure for Low/Moderate Income Housing Benefit: 1049 households Tenant-based rental assistance/Rapid Rehousing: 15 households Homeless Person Overnight Shelter: 200 persons Homelessness Prevention: 3714 persons
Provide housing/services to the HIV/AIDS population	HIV/AIDS Housing Operations: 175 households
Provide housing/services to other special needs populations	Public Facility or Infrastructure for Low/Moderate Income Housing Benefit: 1954 households Homelessness Prevention: 31 persons
Provide projects/activities for eligible youth and families	Public Facility or Infrastructure for Low/Moderate Income Housing Benefit: 1414 households Public Services activities for Low/Moderate Income Housing Benefit: 76 households

3. Evaluation of past performance

The summary of past performance reported below was taken from the City's most recently completed Consolidated Annual Plan Evaluation Report completed for fiscal year 2019 and submitted to HUD.

Goal Name	Goal Outcome Indicator
Expand Supply of quality affordable rental housing	Rental units rehabilitated: 71 household housing unit Public service activities other than Low/Moderate Income Housing Benefit: 789 persons assisted Homeowner housing added: 30 household housing units Homeowner housing rehabilitated: 8 household housing units
Housing and services for the HIV/AIDS population	Housing for People with HIV/AIDS added: 161 household housing units Public service activities other than Low/Moderate Income Housing Benefit: 20 persons assisted
Housing options and services for the homeless	Public service activities other than Low/Moderate Income Housing Benefit: 233 persons assisted Tenant-based rental assistance/ Rapid Rehousing: 21 households assisted Homeless person overnight shelter: 232 persons assisted Overnight/Emergency Shelter/Transitional Housing Beds added: 312 Homelessness prevention: 91 persons assisted Other: 2494 Other
Improve the quality of the existing housing stock	Homeowner housing rehabilitated: 30 household housing units
Mitigate blight from neglected/ vacant properties	Public Facility or Infrastructure Activities for Low/Moderate Income Housing Benefit: 30 households assisted
Projects/activities for eligible youth and families	Public service activities other than Low/Moderate Income Housing Benefit: 756 persons assisted Homeless person overnight shelter: 168 persons assisted

4. Summary of Citizen Participation Process and consultation process

Public Needs Hearing – One public needs hearing was held on January 29th from 11:00 AM to 1:00 PM virtually via Zoom to educate residents and organizations about the CDBG programs and obtain input on housing and community development needs.

Public Comment Period – A draft of the Annual Plan for fiscal year 2021 was placed on public display for 30 days beginning March 17th through April 17th, 2021.

Public Hearing – The City held a public hearing on March 25th, 2021 at 10:00 AM via Zoom to obtain final comments on the proposed use of funds for FY 2021.

5. Summary of public comments

Major needs highlighted during the public participation process include:

Affordable housing options

- Increasing affordable housing options was the most cited priority at the stakeholder workshops and public meetings.
- Poor credit history, outstanding bills, and criminal records serve as major barriers to attaining housing.
- Developers cite that high land and construction costs offset incentives for building new affordable housing.
- In cases where rehabilitation is not possible, the cost of demolition and remediation of the site also serve as major barriers for developers.
- Stakeholders repeatedly mentioned the need for home repairs, rehabilitation, and home modifications to allow for aging-in-place.
- Many stakeholders providing home repair services work with homeowners that do not qualify for home improvement loans to lack of home insurance or timeliness issues with mortgage payments.
- High utility costs are a major barrier to maintaining housing for low-income residents

Homeless services

- Both transitional housing and permanent supportive housing were considered major needs by stakeholders.
- Populations most commonly facing risk of homelessness, according to stakeholders, are victims of domestic violence, justice-involved individuals, and individuals aging out of the foster care system.
- Evictions have historically been a major cause of homelessness. There is a concern for a sudden increase in homelessness once the eviction moratorium is lifted.

Special needs services

- Several special needs service programs were indicated as priorities, especially for re-entry, educational/vocational services, and mental health services.
- Landlords are very selective in terms of criminal history, source of income, and providing vital documents, such as birth certificates or Social Security number, that these individuals may have difficulty accessing.
- The lack of literacy and soft skills are major barriers for these individuals in terms of finding jobs with livable wages.

6. Summary of comments or views not accepted and the reasons for not accepting them

All comments and views were accepted. Comments outside the scope of the plan were not addressed.

7. Summary

In summary, the Annual Action Plan has been developed with community input and reflects the needs of the City.

PR-05 Lead & Responsible Agencies – 91.200(b)

1. Agency/entity responsible for preparing/administering the Consolidated Plan

Describe the agency/entity responsible for preparing the Consolidated Plan and those responsible for administration of each grant program and funding source.

Agency Role	Name	Department/Agency
CDBG Administrator	WILMINGTON	Department of Real Estate and Housing
HOPWA Administrator	WILMINGTON	Department of Real Estate and Housing
HOME Administrator	WILMINGTON	Department of Real Estate and Housing
ESG Administrator	WILMINGTON	Department of Real Estate and Housing

Table 1 – Responsible Agencies

Consolidated Plan Public Contact Information

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AP-10 Consultation – 91.100, 91.200(b), 91.215(I)

1. Introduction

The City of Wilmington developed an outreach effort to maximize input from a large cross-section of stakeholders. The outreach effort included stakeholder meetings, public hearings, and published meeting notices.

The City held a public needs meeting on January 29th. Participants included affordable housing providers, neighborhood organizations, homeless and social service providers, and city staff members.

Provide a concise summary of the jurisdiction’s activities to enhance coordination between public and assisted housing providers and private and governmental health, mental health and service agencies (91.215(I))

The City of Wilmington encourages public communication and agency consultation to demonstrate its commitment to identifying priority needs and engaging the participation of citizens, public agencies, and nonprofit organizations in a positive and collaborative manner. A list of stakeholders and affordable housing providers was developed and included public agencies and private nonprofit organizations whose missions include the provision of affordable housing and human services to low- and moderate-income households and persons. These stakeholders were invited to participate in group interviews held for the purpose of developing the Con Plan. The list of stakeholders is included in the Citizen Participation Comments section.

Describe coordination with the Continuum of Care and efforts to address the needs of homeless persons (particularly chronically homeless individuals and families, families with children, veterans, and unaccompanied youth) and persons at risk of homelessness.

The Delaware Continuum of Care and Delaware HIV Consortium both have interagency agreements with the City of Wilmington to manage a select amount of federal entitlement activities supported by ESG and HOPWA, respectively. Close cooperation exists between the City, the CoC, the HIV Consortium, local nonprofit agencies, homeless service providers, and regional organizations to enhance coordination.

Describe consultation with the Continuum(s) of Care that serves the jurisdiction's area in determining how to allocate ESG funds, develop performance standards for and evaluate outcomes of projects and activities assisted by ESG funds, and develop funding, policies and procedures for the operation and administration of HMIS

Service providers that work with persons experiencing homelessness participated in stakeholder meetings as described above. As mentioned previously, The Delaware Continuum of Care has an interagency agreement with the City of Wilmington to manage a select amount of federal entitlement activities supported by ESG. Homeless services funded by CDBG dollars follow the priorities and review process set by the Delaware CoC when evaluating CoC funding from HUD.

2. Describe Agencies, groups, organizations and others who participated in the process and describe the jurisdiction’s consultations with housing, social service agencies and other entities

1	Agency/Group/Organization	City of Wilmington
	Agency/Group/Organization Type	Other government - City
	What section of the Plan was addressed by Consultation?	Non-homeless special needs Housing Needs Assessment Homelessness Strategy Economic Development Anti-poverty Strategy
	How was the Agency/Group Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination	Public outreach and consultation, participation in stakeholder meetings.
2	Agency/Group/Organization	New Castle County
	Agency/Group/Organization Type	Other government - County
	What section of the Plan was addressed by Consultation?	Non-homeless special needs Housing Needs Assessment Homelessness Strategy Economic Development Anti-poverty Strategy
	How was the Agency/Group Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination	Collaboration with public outreach efforts and consultation.
3	Agency/Group/Organization	Salvation Army
	Agency/Group/Organization Type	Services - Homeless Services - Education Services - Elderly Persons Non-Homeless Special Needs
	What section of the Plan was addressed by Consultation?	Homelessness Strategy Homeless Needs Assessment

	How was the Agency/Group Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination	Attended stakeholder meetings.
4	Agency/Group/Organization	Edgemoor Revitalization Cooperative
	Agency/Group/Organization Type	Non-Homeless Special Needs
	What section of the Plan was addressed by Consultation?	Housing Needs Assessment
	How was the Agency/Group Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination	Attended stakeholder meetings.
5	Agency/Group/Organization	State of Delaware, Division of Human Relations
	Agency/Group/Organization Type	Other government - State
	What section of the Plan was addressed by Consultation?	Housing Needs Assessment
	How was the Agency/Group Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination	Attended stakeholder meetings.
6	Agency/Group/Organization	Good Neighbors Home Repair
	Agency/Group/Organization Type	Services - Housing
	What section of the Plan was addressed by Consultation?	Housing Needs Assessment
	How was the Agency/Group Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination	Attended stakeholder meetings.
7	Agency/Group/Organization	HDC Midatlantic
	Agency/Group/Organization Type	Services - Housing
	What section of the Plan was addressed by Consultation?	Housing Needs Assessment
	How was the Agency/Group Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination	Attended stakeholder meetings.
8	Agency/Group/Organization	Habitat for Humanity of New Castle County
	Agency/Group/Organization Type	Services - Housing

	What section of the Plan was addressed by Consultation?	Housing Needs Assessment
	How was the Agency/Group Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination	Attended stakeholder meetings.
9	Agency/Group/Organization	Woodlawn Trustees
	Agency/Group/Organization Type	Services - Housing
	What section of the Plan was addressed by Consultation?	Housing Needs Assessment
	How was the Agency/Group Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination	Attended stakeholder meetings.
10	Agency/Group/Organization	Catholic Charities
	Agency/Group/Organization Type	Services - Homeless Services - Food Assistance Non-Homeless Special Needs
	What section of the Plan was addressed by Consultation?	Homelessness Strategy Homeless Needs Assessment
	How was the Agency/Group Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination	Attended stakeholder meetings.
11	Agency/Group/Organization	REACH Riverside
	Agency/Group/Organization Type	Services - Housing Services - Education Non-Homeless Special Needs
	What section of the Plan was addressed by Consultation?	Housing Needs Assessment
	How was the Agency/Group Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination	Attended stakeholder meetings.
12	Agency/Group/Organization	Interfaith Community Housing of Delaware
	Agency/Group/Organization Type	Services - Housing
	What section of the Plan was addressed by Consultation?	Housing Needs Assessment

	How was the Agency/Group Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination	Attended stakeholder meetings.
13	Agency/Group/Organization	2 Fish Home Renovations
	Agency/Group/Organization Type	Services - Housing
	What section of the Plan was addressed by Consultation?	Housing Needs Assessment
	How was the Agency/Group Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination	Attended stakeholder meetings.
14	Agency/Group/Organization	First State Community Action Agency
	Agency/Group/Organization Type	Services - Housing Services - Homeless Services - Education Services - Employment
	What section of the Plan was addressed by Consultation?	Housing Needs Assessment Homelessness Strategy Homeless Needs Assessment
	How was the Agency/Group Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination	Attended stakeholder meetings.
15	Agency/Group/Organization	Leon N. Weiner & Associates
	Agency/Group/Organization Type	Services - Housing
	What section of the Plan was addressed by Consultation?	Housing Needs Assessment
	How was the Agency/Group Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination	Attended stakeholder meetings.
16	Agency/Group/Organization	NCALL Research
	Agency/Group/Organization Type	Services - Housing
	What section of the Plan was addressed by Consultation?	Housing Needs Assessment
	How was the Agency/Group Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination	Attended stakeholder meetings.
17	Agency/Group/Organization	Delaware State Housing Authority
	Agency/Group/Organization Type	PHA

	What section of the Plan was addressed by Consultation?	Housing Need Assessment Public Housing Needs Market Analysis
	How was the Agency/Group Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination	Attended stakeholder meetings.
18	Agency/Group/Organization	Breckstone Architecture
	Agency/Group/Organization Type	Services - Housing
	What section of the Plan was addressed by Consultation?	Housing Needs Assessment
	How was the Agency/Group Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination	Attended stakeholder meetings.
19	Agency/Group/Organization	Brandywine Counseling
	Agency/Group/Organization Type	Services - Homeless Services - Education Services - Victims of Domestic Violence Non-Homeless Special Needs
	What section of the Plan was addressed by Consultation?	Homelessness Strategy Homeless Needs Assessment
	How was the Agency/Group Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination	Attended stakeholder meetings.
20	Agency/Group/Organization	Family Promise of Northern New Castle County
	Agency/Group/Organization Type	Services - Homeless Homeless needs - Families with children
	What section of the Plan was addressed by Consultation?	Homelessness Strategy Homeless Needs Assessment Anti-poverty Strategy
	How was the Agency/Group Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination	Attended stakeholder meetings.
21	Agency/Group/Organization	Cinnaire
	Agency/Group/Organization Type	Services - Housing
	What section of the Plan was addressed by Consultation?	Housing Needs Assessment

	How was the Agency/Group Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination	Attended stakeholder meetings.
22	Agency/Group/Organization	Battle Cry Ministry
	Agency/Group/Organization Type	Services - Homeless
	What section of the Plan was addressed by Consultation?	Homelessness Strategy Homeless Needs Assessment
	How was the Agency/Group Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination	Attended stakeholder meetings.
23	Agency/Group/Organization	Central Baptist CDC
	Agency/Group/Organization Type	Services - Housing Services - Employment Non-Homeless Special Needs
	What section of the Plan was addressed by Consultation?	Housing Needs Assessment Anti-poverty Strategy
	How was the Agency/Group Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination	Attended stakeholder meetings.
24	Agency/Group/Organization	Housing Alliance Delaware
	Agency/Group/Organization Type	CoC Services - Homeless
	What section of the Plan was addressed by Consultation?	Housing Needs Assessment Homelessness Strategy Homeless Needs Assessment
	How was the Agency/Group Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination	Attended stakeholder meetings.
25	Agency/Group/Organization	Henrietta Johnson Medical Center
	Agency/Group/Organization Type	Services - Health
	What section of the Plan was addressed by Consultation?	Housing Needs Assessment
	How was the Agency/Group Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination	Attended stakeholder meetings.
26	Agency/Group/Organization	United Way of Delaware

	Agency/Group/Organization Type	Services - Education Services - Homeless Non-Homeless Special Needs
	What section of the Plan was addressed by Consultation?	Housing Needs Assessment Homelessness Strategy Homeless Needs Assessment
	How was the Agency/Group Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination	Attended stakeholder meetings.
27	Agency/Group/Organization	The Ministry of Caring
	Agency/Group/Organization Type	Services - Housing Services - Homeless Services - Food Assistance
	What section of the Plan was addressed by Consultation?	Housing Needs Assessment Homelessness Strategy Homeless Needs Assessment Anti-poverty Strategy
	How was the Agency/Group Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination	Attended stakeholder meetings.
28	Agency/Group/Organization	Wilmington Neighborhood Conservancy Land Bank
	Agency/Group/Organization Type	Services - Housing
	What section of the Plan was addressed by Consultation?	Housing Needs Assessment
	How was the Agency/Group Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination	Attended stakeholder meetings.
29	Agency/Group/Organization	Sacred Heart Housing
	Agency/Group/Organization Type	Services - Housing
	What section of the Plan was addressed by Consultation?	Housing Needs Assessment
	How was the Agency/Group Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination	Attended stakeholder meetings.
30	Agency/Group/Organization	New Castle County Board of Realtors
	Agency/Group/Organization Type	Business Leaders Services - Housing

	What section of the Plan was addressed by Consultation?	Housing Needs Assessment Market Analysis
	How was the Agency/Group Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination	Attended stakeholder meetings.
31	Agency/Group/Organization	Delaware Transit Corporation
	Agency/Group/Organization Type	Other government - State
	What section of the Plan was addressed by Consultation?	Economic Development Market Analysis
	How was the Agency/Group Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination	Attended stakeholder meetings.
32	Agency/Group/Organization	Delaware Center for Horticulture
	Agency/Group/Organization Type	Services - Employment
	What section of the Plan was addressed by Consultation?	Economic Development Non-Homeless Special Needs
	How was the Agency/Group Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination	Attended stakeholder meetings.
33	Agency/Group/Organization	Lutheran Community Services
	Agency/Group/Organization Type	Services - Food Assistance Services - Housing Non-Homeless Special Needs
	What section of the Plan was addressed by Consultation?	Housing Needs Assessment Non-Homeless Special Needs Anti-poverty Strategy
	How was the Agency/Group Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination	Attended stakeholder meetings.
34	Agency/Group/Organization	YWCA Delaware
	Agency/Group/Organization Type	Services - Housing Services - Victims of Domestic Violence Services - Education Non-Homeless Special Needs
	What section of the Plan was addressed by Consultation?	Homelessness Strategy Homeless Needs Assessment

	How was the Agency/Group Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination	Attended stakeholder meetings.
35	Agency/Group/Organization	Warriors Helping Warriors
	Agency/Group/Organization Type	Services - Veterans Non-Homeless Special Needs
	What section of the Plan was addressed by Consultation?	Non-Homeless Special Needs
	How was the Agency/Group Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination	Attended stakeholder meetings.
36	Agency/Group/Organization	West End Neighborhood House
	Agency/Group/Organization Type	Services - Education Services - Employment Services - Housing
	What section of the Plan was addressed by Consultation?	Housing Needs Assessment Economic Development Anti-poverty Strategy
	How was the Agency/Group Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination	Attended stakeholder meetings.
37	Agency/Group/Organization	Food Bank of Delaware
	Agency/Group/Organization Type	Services - Food Assistance
	What section of the Plan was addressed by Consultation?	Non-Homeless Special Needs Anti-poverty Strategy
	How was the Agency/Group Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination	Attended stakeholder meetings.
38	Agency/Group/Organization	University of Delaware, Center for Community Research & Service
	Agency/Group/Organization Type	Services - Education
	What section of the Plan was addressed by Consultation?	Non-Homeless Special Needs Anti-poverty Strategy
	How was the Agency/Group Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination	Attended stakeholder meetings.
39	Agency/Group/Organization	Wilmington Alliance

	Agency/Group/Organization Type	Civic leaders
	What section of the Plan was addressed by Consultation?	Economic Development Market Analysis
	How was the Agency/Group Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination	Attended stakeholder meetings.
40	Agency/Group/Organization	ACLU - Delaware
	Agency/Group/Organization Type	Civic leaders
	What section of the Plan was addressed by Consultation?	Non-Homeless Special Needs
	How was the Agency/Group Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination	Attended stakeholder meetings.
41	Agency/Group/Organization	STEHM
	Agency/Group/Organization Type	Services - Housing Services - Homeless Services - Victims of Domestic Violence
	What section of the Plan was addressed by Consultation?	Homelessness Strategy Homeless Needs Assessment
	How was the Agency/Group Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination	Attended stakeholder meetings.
42	Agency/Group/Organization	Delaware Center for Homeless Veterans
	Agency/Group/Organization Type	Services - Housing Services - Homeless Services - Veterans
	What section of the Plan was addressed by Consultation?	Homelessness Strategy Homeless Needs Assessment
	How was the Agency/Group Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination	Attended stakeholder meetings.
43	Agency/Group/Organization	Neighborhood House
	Agency/Group/Organization Type	Services - Housing Services - Education
	What section of the Plan was addressed by Consultation?	Homelessness Strategy Homeless Needs Assessment

	How was the Agency/Group Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination	Attended stakeholder meetings.
44	Agency/Group/Organization	Amerihealth Caritas - LTSS Housing
	Agency/Group/Organization Type	Services - Housing Services - Health
	What section of the Plan was addressed by Consultation?	Homelessness Strategy Homeless Needs Assessment Non-Homeless Special Needs
	How was the Agency/Group Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination	Attended stakeholder meetings.
45	Agency/Group/Organization	Mid-County Center
	Agency/Group/Organization Type	Services - Elderly Persons
	What section of the Plan was addressed by Consultation?	Homelessness Strategy Homeless Needs Assessment Non-Homeless Special Needs
	How was the Agency/Group Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination	Attended stakeholder meetings.
46	Agency/Group/Organization	Saint Patrick's Center
	Agency/Group/Organization Type	Services - Homeless Services - Food Assistance Non-Homeless Special Needs
	What section of the Plan was addressed by Consultation?	Homelessness Strategy Homeless Needs Assessment Non-Homeless Special Needs
	How was the Agency/Group Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination	Attended stakeholder meetings.
47	Agency/Group/Organization	Connections CSP
	Agency/Group/Organization Type	Services - Housing Services - Health Services - Employment
	What section of the Plan was addressed by Consultation?	Housing Needs Assessment Homeless Needs Assessment Non-Homeless Special Needs

	How was the Agency/Group Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination	Attended stakeholder meetings.
48	Agency/Group/Organization	Wilminvest
	Agency/Group/Organization Type	Services - Housing
	What section of the Plan was addressed by Consultation?	Housing Needs Assessment Non-Homeless Special Needs
	How was the Agency/Group Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination	Attended stakeholder meetings.
49	Agency/Group/Organization	Daughters of Zion Inc.
	Agency/Group/Organization Type	Services - Housing Services - Homeless
	What section of the Plan was addressed by Consultation?	Housing Needs Assessment Homeless Needs Assessment Non-Homeless Special Needs
	How was the Agency/Group Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination	Attended stakeholder meetings.
50	Agency/Group/Organization	Brightfield Inc.
	Agency/Group/Organization Type	Services - Housing Non-Homeless Special Needs
	What section of the Plan was addressed by Consultation?	Housing Needs Assessment Non-Homeless Special Needs Market Analysis
	How was the Agency/Group Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination	Attended stakeholder meetings.
51	Agency/Group/Organization	DCRAC - The Money School
	Agency/Group/Organization Type	Services - Education
	What section of the Plan was addressed by Consultation?	Housing Needs Assessment Market Analysis
	How was the Agency/Group Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination	Attended stakeholder meetings.
52	Agency/Group/Organization	Housing Opportunities of Northern Delaware

Agency/Group/Organization Type	Services - Housing
What section of the Plan was addressed by Consultation?	Housing Needs Assessment Market Analysis
How was the Agency/Group Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination	Attended stakeholder meetings.

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Table 2 – Agencies, groups, organizations who participated

Identify any Agency Types not consulted and provide rationale for not consulting

All relevant entities were considered for consultation.

Other local/regional/state/federal planning efforts considered when preparing the Plan

Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
Wilmington 2028 – Comprehensive Plan	City of Wilmington	The affordable housing and anti-poverty goals and strategies of both plans align.
Comprehensive Economic Development Strategy	Delaware Economic Development Office	Economic and workforce development strategies of both plans align.

Table 3 – Other local / regional / federal planning efforts

AP-12 Participation – 91.105, 91.200(c)

**1. Summary of citizen participation process/Efforts made to broaden citizen participation
Summarize citizen participation process and how it impacted goal-setting**

Public Needs Hearing – One public needs hearing was held on January 29th, 2021 from 11:00 AM to 1:00 PM virtually via Zoom to educate residents and organizations about the CDBG programs and obtain input on housing and community development needs.

Public Comment Period – A draft of the Annual Plan for fiscal year 2021 was placed on public display for 30 days beginning March 12^h through April 14th, 2021.

Public Hearing – The City held a public hearing on March 25th, 2021 at 10:00 AM via Zoom to obtain final comments on the proposed use of funds for FY 2021.

Citizen Participation Outreach

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
1	Public Needs Hearing	Non-targeted/ broad community	14 attendees	See comments in Citizen Participation Comments	None	
2	Public Meeting	Non-targeted/ broad community	Not yet occurred – March 25, 2021	See comments in Citizen Participation Comments	None	
3	Public Display Period	Non-targeted/ broad community	Not yet occurred- March 12, 2021 through April 14, 2021	See comments in Citizen Participation Comments	None	

Table 4 – Citizen Participation Outreach

Expected Resources

AP-15 Expected Resources – 91.220(c)(1,2)

Introduction

Anticipated Resources

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Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
CDBG	Public - federal	Acquisition Admin & Planning Econ Development Housing Public Improve. Public Services	\$2,219,037	\$0	\$0	\$2,219,037	\$6,648,675	Funds for housing and non-housing community development needs. Remainder available is approximately four times projected annual allocation and anticipated annual program income.
HOME	Public - federal	Acquisition Homebuyer Asst. Homeowner Rehab. Rental New Constr. Rental Rehab. New Const. for Ownership TBRA	\$579,619	\$0	\$0	\$579,619	\$1,676,477	Funds for rehabilitation of rental and homeowner housing units and rehabilitation. Remainder available is approximately four times projected annual allocation and anticipated annual program income.

ESG	Public - federal	Conversion and rehab for transitional housing Financial Assistance Overnight shelter Rapid re-housing (rental assistance) Rental Assistance Services Transitional housing	\$189,070	\$0	\$0	\$189,070	\$562,254	Funds for homeless services including Centralized Intake, transitional housing/ Rapid Rehousing, emergency shelters, and in-house supportive services.
HOPWA	Public - federal	Permanent housing in facilities Permanent housing placement STRMU Short term or transitional housing facilities Supportive services TBRA	\$824,463	\$0	\$0	\$824,463	\$2,385,277	Funds for housing services for people with HIV/AIDS, including financial assistance, case management, medical care, TBRA, and permanent supportive housing.

Table 5 - Expected Resources – Priority Table

Explain how federal funds will leverage those additional resources (private, state and local funds), including a description of how

matching requirements will be satisfied

Additional resources will be leveraged from the Delaware State Housing Authority and local and regional foundations

If appropriate, describe publicly owned land or property located within the jurisdiction that may be used to address the needs identified in the plan

The City is not using publicly owned land or property to meeting the needs and goals of the Annual Action Plan.

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Annual Goals and Objectives

AP-20 Annual Goals and Objectives

Goals Summary Information

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	Improve quality of existing housing stock	2020	2024	Affordable Housing	City-wide	Improve Access to Affordable Housing	CDBG: \$817,963 HOME: \$521,657	Homeowner Housing Rehabilitated: 40 housing units
2	Increase supply of existing housing stock	2020	2024	Affordable Housing Public Housing	City-wide	Improve Access to Affordable Housing	CDBG: \$107,632	
3	Improve public infrastructure	2020	2024	Non-Housing Community Development	City-wide	Public Facilities and Infrastructure Improvement	CDBG: \$540,764	Public Facility or Infrastructure other than Low/Moderate Income Housing Benefit: 209 persons
4	Improve public facilities	2020	2024	Non-Housing Community Development	City-wide	Public Facilities and Infrastructure Improvement	CDBG: \$100,000	

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
5	Housing/services to the homeless and near homeless	2020	2024	Homeless	City-wide	Services for Special Needs	CDBG: \$142,362 ESG: \$189,070	Homeless Person Overnight Shelter: 350 persons Homelessness Prevention: 3974 persons
6	Housing/services to the HIV/AIDS population	2020	2024	Homeless Non-Homeless Special Needs	City-wide	Services for Special Needs	HOPWA: \$799,729	Housing for People with HIV/AIDS added: 175 households housing units
7	Housing/services to other special needs population	2020	2024	Non-Homeless Special Needs	City-wide	Services for Special Needs	CDBG: \$90,493	Public Service activities other than Low/Moderate Income Housing Benefit: 634 persons Homeless Person Overnight Shelter: 380 persons

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
8	Activities for eligible youth and families	2020	2024	Non-Housing Community Development	City-wide	Help all residents meet basic social and economic needs	CDBG: \$100,000	Public Service activities other than Low/Moderate Income Housing Benefit: 966 persons
9	Planning/Administration	2020	2024	Admin	City-wide	Planning/Administration	CDBG: \$90,493 HOME: \$57,962 HOPWA: \$24,734	

Table 6 – Goals Summary

Goal Descriptions

1	Goal Name	Improve quality of existing housing stock
	Goal Description	Extend the useful life of existing affordable housing through weatherization, repair, and rehabilitation programs.
2	Goal Name	Increase supply of existing housing stock
	Goal Description	Fund activities that expand the supply and improve the condition of housing affordable to lower income households, including new construction and leveraging other public and private resources such as Low Income Housing Tax Credits to make housing more available to low- and moderate-income households.
3	Goal Name	Improve public infrastructure
	Goal Description	The City will use CDBG funds to make improvements to streets, sidewalks, stormwater infrastructure, water and sewer infrastructure, and other public infrastructure over the next several years.
4	Goal Name	Improve public facilities

	Goal Description	The City will use CDBG funds to make improvements to public facilities such as senior centers, homeless facilities, facilities for persons with special needs, youth centers, neighborhood facilities, parks, child care centers, health facilities, and other public buildings over the next several years.
5	Goal Name	Provide housing/services to the homeless and near-homeless population
	Goal Description	The City will use CDBG and ESG funds to support shelter and housing operations. Acquisition, construction, or rehabilitation of temporary shelters and transitional housing for the homeless, including victims of domestic violence, veterans, disaster victims, families with children, unaccompanied youth, drug offenders, and formerly incarcerated persons. Provide funding to increase permanent supportive housing opportunities and work to create a stronger network of providers of supportive and mainstream services to homeless clients.
6	Goal Name	Provide housing/services to the HIV/AIDS population
	Goal Description	The City will use HOWPA funds to address the housing needs of people living with HIV/AIDS. Activities include TBRA, STRMU, permanent housing, supportive services, case management, and medical services.
7	Goal Name	Provide housing/services to other special needs population
	Goal Description	The City will use CDBG to fund activities addressing the needs of other special needs populations. This includes but is not limited to elderly, youth transitioning out of foster care, victims of domestic violence, and justice-involved individuals facing re-entry. Services encompass childcare services, health and mental health services, broadband access, transportation, non-homeless special needs and employment training.
8	Goal Name	Provide projects/activities for eligible youth and families

	Goal Description	The City will provide support for services serving non-homeless youths and families in need of assistance to improve their quality of life. Activities include vocational services, life skills training, education assistance programs, and financial literacy programs for both adults and youth.
9	Goal Name	Planning/Administration
	Goal Description	Support administration and delivery of CDBG activities.

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Projects

AP-35 Projects – 91.220(d)

Introduction

The following is a list of CDBG, HOME, ESG and HOPWA activities that the City of Wilmington will undertake in FY 2021.

Projects

#	Project Name
1	CDBG Property Repair Program
2	CDBG Code Repair Program
3	CDBG Down Payment and Closing Costs
4	CDBG Public Facilities and Site Improvement - Market Street /30th Street Park
5	CDBG Ingleside Housing Project (Incl. Delivery)
6	DE Center for Horticulture Street Trees CDBG (PI)
7	Fair Housing
8	CDBG Property Stabilization
9	CDBG Home Repair Program Delivery
10	CDBG Disposition Program Delivery
11	Riverside Redevelopment Phase II Site Improvements
12	The Flats Phase IV
13	CDBG Admin Salaries
14	HOME Administration
15	HOPWA Administration
16	ESG FY 2021
17	Rehab Delivery - 106 Reviews
18	DVDC - West Court
19	Central Baptist CHDO - East Side Rising
20	Habitat for Humanity - Bennett Street
21	Sacred Heart Villa Maria
22	Catholic Charities, Inc.
23	Cecil County Health Department - TBRA/STRMU
24	Delaware HIV Services, Inc.
25	Ministry of Caring, Inc. - House of Joseph II
26	Catholic Charities - Bayard House
27	Catholic Charities, Inc. - Homeless Prevention Services
28	Family Promise - Rapid Rehousing
29	Housing Opportunities of Northern Delaware
30	Housing Alliance of Delaware - Centralized Intake
31	Latin American Community Center - Homeless Prevention

#	Project Name
32	Lutheran Community Services
33	Neighborhood House, Inc - Homeless Prevention and Family Services
34	Neighborhood House, Inc. - Housing Intervention and Outreach Counseling
35	Sojourners Place - Transitional Housing
36	Family Counseling Center of St Paul (RCCSP)
37	STEHM, Inc. - Direct Case Management
38	The Salvation Army - Code Purple
39	The Wilmington HOPE Commission - Reentry Services
40	West End Neighborhood House Inc - Life Lines
41	YMCA of Delaware - Supportive Housing
42	YWCA Delaware - Home Life Management Center
43	Christiana Cultural Arts Center - Future Entrepreneurs
44	Christiana Cultural Arts Center - Heart Under the Hoodie
45	Delaware Futures, Inc. - One Student At A Time
46	Duffy's Hope, Inc. - Youth Ambassador Program
47	Reach Riverside - Empower
48	Kingswood Community Center - Jimmy Jenkins
49	Latin American Community Center - Youth Prevention
50	Tech Impact - IT Works
51	Teen Warehouse
52	The Challenge Program - Construction Training Program
53	West End Neighborhood House - Above Xpectation Track
54	YMCA of Delaware - YMCA Teen Engagement

Table 7 - Project Information

Describe the reasons for allocation priorities and any obstacles to addressing underserved needs

The majority of Wilmington’s projects, including public service, housing, public facility, and public infrastructure activities, are selected through a competitive process. All CDBG projects and programs funded in 2021 were chosen because they address high priority needs in the community. Projects selected for CDBG funding were prioritized on efficient utilization of non-CDBG funds and ability to serve the largest number of beneficiaries.

AP-38 Project Summary

Project Summary Information

1	Project Name	RE&H CDBG Property Repair Program
	Target Area	City-wide
	Goals Supported	Improve quality of existing housing stock
	Needs Addressed	Improve Access to Affordable Housing
	Funding	CDBG: \$100,000
	Description	Rectify existing exterior code violations which have been determined by a City of Wilmington Housing Inspector and formalized in an individual housing report, are allowable rehabilitation costs.
	Target Date	7/1/2022
	Estimate the number and type of families that will benefit from the proposed activities	
	Location Description	City-wide
	Planned Activities	A deferred forgivable loan not to exceed a maximum value of \$4,999 will be offered for income-eligible households to rectify existing exterior code violations.
2	Project Name	RE&H CDBG Code Repair Program
	Target Area	City-wide
	Goals Supported	Improve quality of existing housing stock
	Needs Addressed	Improve Access to Affordable Housing
	Funding	CDBG: \$100,000
	Description	
	Target Date	7/1/2022
	Estimate the number and type of families that will benefit from the proposed activities	
	Location Description	City-wide
	Planned Activities	
3	Project Name	RE&H CDBG Down Payment and Closing Costs
	Target Area	City-wide
	Goals Supported	Increase supply of existing housing stock
	Needs Addressed	Improve Access to Affordable Housing
	Funding	CDBG: \$25,000
	Description	Down payment assistance
	Target Date	7/1/2022

	Estimate the number and type of families that will benefit from the proposed activities	
	Location Description	City-wide
	Planned Activities	Program providing homeowner assistance in the form of financial assistance with down payments and closing costs for first-time and income-eligible homeowners.
4	Project Name	RE&H CDBG Public Facilities and Site Improvement
	Target Area	City-wide
	Goals Supported	Improve public facilities
	Needs Addressed	Public Facilities and Infrastructure Improvement
	Funding	CDBG: \$100,000
	Description	Public facilities and infrastructure Improvements
	Target Date	7/1/2022
	Estimate the number and type of families that will benefit from the proposed activities	
	Location Description	City-wide
	Planned Activities	Market Street/ 30th Street Park
5	Project Name	Ingleside Housing Project
	Target Area	City-wide
	Goals Supported	Improve quality of existing housing stock
	Needs Addressed	Improve Access to Affordable Housing
	Funding	CDBG: \$100,000
	Description	The project addresses home repairs and safety modifications essential for older homeowners that will enable them to remain independent.
	Target Date	7/1/2022
	Estimate the number and type of families that will benefit from the proposed activities	40 homeowner households
	Location Description	City-wide
	Planned Activities	Rehab services include home safety inspections, home repairs, fall prevention measures, and social services.
6	Project Name	Delaware Center For Horticulture
	Target Area	City-wide
	Goals Supported	Improve public infrastructure
	Needs Addressed	Public Facilities and Infrastructure Improvement
	Funding	CDBG: \$100,000
	Description	Wilmington Neighborhoods Street Tree and Greening Program and Branches to Chances Re-Entry Program
	Target Date	7/1/2022

	Estimate the number and type of families that will benefit from the proposed activities	90 households
	Location Description	City-wide
	Planned Activities	The Neighborhood Street Tree & Greening Program serves to reduce and eliminate urban blight by managing and restoring the urban tree canopy by focusing efforts on low-income areas, which also typically have less trees. Plantings will be timed and coordinated with the completion of housing construction and redevelopment projects to provide equal access to trees as a shared community resource. A strategy to determine best green locations will also be utilized via GIS, taking into account income levels, MVA market indicators, impervious surfaces, current tree canopy, asthma rates, flood claims, major roads, vacant lots, local institutions, public amenities, and public green space.
7	Project Name	RE&H Fair Housing
	Target Area	City-wide
	Goals Supported	Planning/Administration
	Needs Addressed	Planning/Administration
	Funding	CDBG: \$10,000
	Description	Activities to affirmatively further fair housing.
	Target Date	7/1/2021
	Estimate the number and type of families that will benefit from the proposed activities	
	Location Description	City-wide
	Planned Activities	
8	Project Name	CDBG Property Stabilization
	Target Area	City-wide
	Goals Supported	Improve quality of existing housing stock
	Needs Addressed	Improve Access to Affordable Housing
	Funding	CDBG: \$100,000
	Description	
	Target Date	7/1/2022
	Estimate the number and type of families that will benefit from the proposed activities	
	Location Description	City-wide
	Planned Activities	
9	Project Name	RE&H CDBG Home Repair Program Delivery
	Target Area	City-wide
	Goals Supported	Improve quality of existing housing stock

	Needs Addressed	Improve Access to Affordable Housing
	Funding	CDBG: \$387,734
	Description	Emergency home repairs
	Target Date	7/1/2022
	Estimate the number and type of families that will benefit from the proposed activities	
	Location Description	City-wide
	Planned Activities	Repairs include heating, roofing, plumbing, electrical, handicapped facilities where needed, and any condition where an emergency need exists to provide safe and decent living quarters.
10	Project Name	RE&H CDBG Disposition Program Delivery
	Target Area	City-wide
	Goals Supported	Increase supply of existing housing stock
	Needs Addressed	Improve Access to Affordable Housing
	Funding	CDBG: \$82,632
	Description	Disposition
	Target Date	7/1/2022
	Estimate the number and type of families that will benefit from the proposed activities	
	Location Description	City-wide
	Planned Activities	Program to return vacant or abandoned properties to constructive use.
11	Project Name	Riverside Redevelopment Phase II Site Improvements
	Target Area	City-wide
	Goals Supported	Increase supply of existing housing stock
	Needs Addressed	Improve Access to Affordable Housing
	Funding	CDBG: \$350,000
	Description	Site improvements for an affordable housing development.
	Target Date	7/1/2022
	Estimate the number and type of families that will benefit from the proposed activities	67 households
	Location Description	2910 Rosemont Avenue, Wilmington, DE 19802
	Planned Activities	Street work; water and sewer work to the curb.
12	Project Name	The Flats Phase IV
	Target Area	City-wide
	Goals Supported	Increase supply of existing housing stock
	Needs Addressed	Improve Access to Affordable Housing
	Funding	CDBG: \$90,764

	Description	Site improvements for an affordable housing development.
	Target Date	7/1/2022
	Estimate the number and type of families that will benefit from the proposed activities	52 households
	Location Description	600 Block of Ferris Street and Bayard Avenue, Wilmington, DE
	Planned Activities	Street work; water and sewer work to the curb.
13	Project Name	RE&H CDBG Admin Salaries
	Target Area	City-wide
	Goals Supported	Planning/Administration
	Needs Addressed	Planning/Administration
	Funding	CDBG: \$319,823
	Description	CDBG admin costs.
	Target Date	7/1/2022
	Estimate the number and type of families that will benefit from the proposed activities	
	Location Description	City-wide
14	Planned Activities	Admin costs for administrator salaries.
	Project Name	RE&H HOME Administration
	Target Area	City-wide
	Goals Supported	Planning/Administration
	Needs Addressed	Planning/Administration
	Funding	HOME: \$57,962
	Description	Program administration costs for HOME-funded projects.
	Target Date	7/1/2022
	Estimate the number and type of families that will benefit from the proposed activities	
15	Location Description	City-wide
	Planned Activities	Program administration costs for HOME-funded projects.
	Project Name	RE&H HOPWA Administration
	Target Area	City-wide
	Goals Supported	Planning/Administration
	Needs Addressed	Planning/Administration
	Funding	HOPWA: \$24,734
	Description	Program administration costs for HOPWA-funded projects.
	Target Date	7/1/2022
Estimate the number and type of families that will benefit from the proposed activities		

	Location Description	City-wide
	Planned Activities	Program administration costs for HOPWA-funded projects.
16	Project Name	ESG FY 2921
	Target Area	City-wide
	Goals Supported	Planning/Administration
	Needs Addressed	Planning/Administration
	Funding	ESG: \$189,070
	Description	ESG-funded projects.
	Target Date	7/1/2022
	Estimate the number and type of families that will benefit from the proposed activities	Administration: \$14,180 Shelter: \$69,163 Data Collection: \$17,891 RRH: \$87,836
	Location Description	City-wide
	Planned Activities	Program administration costs for ESG-funded projects.
17	Project Name	Rehab Delivery - 106 Reviews
	Target Area	City-wide
	Goals Supported	Improve quality of existing housing stock
	Needs Addressed	Improve quality of existing housing stock
	Funding	CDBG: \$15,229
	Description	Section 106 consultations
	Target Date	7/1/2022
	Estimate the number and type of families that will benefit from the proposed activities	
	Location Description	City-wide
	Planned Activities	Section 106 consultations for federally-funded activities that are not exempt from review.
18	Project Name	DVDC - West Court
	Target Area	City-wide
	Goals Supported	Improve quality of existing housing stock
	Needs Addressed	Improve quality of existing housing stock
	Funding	HOME: \$50,000
	Description	
	Target Date	7/1/2022
	Estimate the number and type of families that will benefit from the proposed activities	
	Location Description	City-wide

	Planned Activities	
19	Project Name	Central Baptist CHDO - East Side Rising
	Target Area	City-wide
	Goals Supported	Improve quality of existing housing stock
	Needs Addressed	Improve quality of existing housing stock
	Funding	HOME: \$20,000
	Description	
	Target Date	7/1/2022
	Estimate the number and type of families that will benefit from the proposed activities	
	Location Description	City-wide
	Planned Activities	
20	Project Name	Habitat for Humanity - Bennett Street
	Target Area	City-wide
	Goals Supported	Improve quality of existing housing stock
	Needs Addressed	Improve quality of existing housing stock
	Funding	HOME: \$51,000
	Description	
	Target Date	7/1/2022
	Estimate the number and type of families that will benefit from the proposed activities	
	Location Description	City-wide
	Planned Activities	
21	Project Name	Sacred Heart - Villa Maria
	Target Area	City-wide
	Goals Supported	Improve quality of existing housing stock
	Needs Addressed	Improve quality of existing housing stock
	Funding	HOME: \$400,657
	Description	
	Target Date	7/1/2022
	Estimate the number and type of families that will benefit from the proposed activities	
	Location Description	City-wide
	Planned Activities	
22	Project Name	Catholic Charities, Inc. - HIV Service
	Target Area	City-wide
	Goals Supported	Provide housing/services to the HIV/AIDS population

	Needs Addressed	Services for Special Needs
	Funding	HOPWA: \$10,213
	Description	Supportive housing services.
	Target Date	7/1/2022
	Estimate the number and type of families that will benefit from the proposed activities	40 persons living with HIV/AIDS and their families
	Location Description	City-wide
	Planned Activities	Catholic Charities HIV Service supports housing options for persons living with HIV/AIDS (PWA), and provides a short-term safety net for these families when housing is threatened by a financial crisis such as sudden under- or unemployment, medical emergency, mismanagement of debt, or other causes.
23	Project Name	Cecil County Health Department - TBRA/STRMU
	Target Area	City-wide
	Goals Supported	Provide housing/services to the HIV/AIDS population
	Needs Addressed	Services for Special Needs
	Funding	HOPWA: \$38,135
	Description	The Cecil County Housing Assistance Program
	Target Date	7/1/2022
	Estimate the number and type of families that will benefit from the proposed activities	10 households with persons living with HIV/AIDS
	Location Description	City-wide
Planned Activities	Prevent homelessness in clients that are HIV positive or People With AIDS (PWAs) and keep them in stable housing in Cecil County, Maryland. Clients are offered supportive services that include prevention education and housing information through long-term TBRA, short-term housing assistance (STRMU), and Permanent Housing Placement (PHP).	
24	Project Name	Delaware HIV Services
	Target Area	City-wide
	Goals Supported	Provide housing/services to the HIV/AIDS population
	Needs Addressed	Services for Special Needs
	Funding	HOPWA: \$660,351
	Description	Delaware Housing Assistance Program (DHAP)
	Target Date	7/1/2022
	Estimate the number and type of families that will benefit from the proposed activities	109 households with persons living with HIV/AIDS
	Location Description	City-wide

	Planned Activities	HOPWA funding would reduce the waiting time for rental assistance and increase the number of households being served. DHAP is also seeking to use HOPWA funding for security deposit for low-income households entering the rental assistance program.
25	Project Name	Ministry of Caring - House of Joseph II
	Target Area	City-wide
	Goals Supported	Provide housing/services to the HIV/AIDS population
	Needs Addressed	Services for Special Needs
	Funding	HOPWA: \$71,030
	Description	Permanent supportive housing and services.
	Target Date	7/1/2022
	Estimate the number and type of families that will benefit from the proposed activities	16 households with persons living with HIV/AIDS
	Location Description	City-wide
	Planned Activities	House of Joseph II provides permanent housing and essential supportive services for homeless men and women living with HIV/AIDS who are in need of ongoing nursing care to live as fully and independently as possible. Serves include case management services, food service, and comprehensive medical care.
26	Project Name	Catholic Charities, Inc. - Bayard House
	Target Area	City-wide
	Goals Supported	Provide housing/services to the homeless and near-homeless population
	Needs Addressed	Services for Special Needs
	Funding	CDBG: \$20,000
	Description	Residential Maternity Program
	Target Date	7/1/2022
	Estimate the number and type of families that will benefit from the proposed activities	40 households - primarily at-risk, homeless, pregnant, and newly parenting adolescents, young women, and their children
Location Description	City-wide	
Planned Activities	The Bayard House Program is the only licensed residential maternity program in Delaware providing 24-hour, seven days a week service to at-risk, homeless, pregnant, and newly parenting adolescents, young women, and their children. Supportive services address the root issues contributing to their risk of homelessness, such as domestic abuse, neglect, single parenthood, and poverty.	
27	Project Name	Catholic Charities, Inc. - Homeless Prevention Service
	Target Area	City-wide
	Goals Supported	Provide housing/services to the homeless and near-homeless population
	Needs Addressed	Services for Special Needs
	Funding	CDBG: \$10,000

	Description	Homeless prevention services.
	Target Date	7/1/2022
	Estimate the number and type of families that will benefit from the proposed activities	40 family households
	Location Description	City-wide
	Planned Activities	Provide a short-term safety net for Delaware families whose housing is threatened by a financial crisis, such as under- or unemployment, medical emergencies, mismanagement of debt, or other causes.
28	Project Name	Family Promise of Northern New Castle County, Inc. - RRH
	Target Area	City-wide
	Goals Supported	Provide housing/services to the homeless and near-homeless population
	Needs Addressed	Services for Special Needs
	Funding	CDBG: \$17,212
	Description	Hospitality Center- Transitional/ Rapid Re-Housing
	Target Date	7/1/2022
	Estimate the number and type of families that will benefit from the proposed activities	40 households for families or individuals
	Location Description	City-wide
Planned Activities	The Hospitality Center provides temporary shelter for six families or twenty individuals at a time. Meals and hospitality are provided to clients. Each unit contains a bathroom, washer/dryers, a computer room, a common area, and a kitchen area. Wraparound case management services are also provided to help families secure permanent housing in the future.	
29	Project Name	Housing Opportunities of Northern Delaware - Predatory Lending and Fair Housing Counseling/Law
	Target Area	City-wide
	Goals Supported	Improve quality of existing housing stock
	Needs Addressed	Improve Access to Affordable Housing
	Funding	CDBG: \$5,000
	Description	Predatory Lending and Fair Housing Counseling/Law
	Target Date	7/1/2022
	Estimate the number and type of families that will benefit from the proposed activities	82 households
	Location Description	City-wide
Planned Activities	The project will provide Fair Housing Law education through outreach activities, workshops, presentation to media, printed materials, forums and face-to-face and	

		group housing counseling sections to City residents, public officials, real estate professionals, landlords, tenants, and City Housing-related Departments.
30	Project Name	Housing Alliance Delaware - Centralize Intake
	Target Area	City-wide
	Goals Supported	Provide housing/services to the homeless and near-homeless population
	Needs Addressed	Services for Special Needs
	Funding	CDBG: \$19,236
	Description	Centralized Intake
	Target Date	7/1/2022
	Estimate the number and type of families that will benefit from the proposed activities	2,500 persons or households experiencing homelessness
	Location Description	City-wide
	Planned Activities	The CI program facilitates access to housing and social services for people experiencing homeless by providing a centralized point of contact to disseminate information and referrals. CI helps streamline procedures to decrease the length of homelessness and improve efficiency of assessing the needs of clients.
31	Project Name	Latin American Community Center - Homeless Prevention
	Target Area	City-wide
	Goals Supported	Provide housing/services to the homeless and near-homeless population
	Needs Addressed	Services for Special Needs
	Funding	CDBG: \$10,000
	Description	Homelessness Prevention services
	Target Date	7/1/2022
	Estimate the number and type of families that will benefit from the proposed activities	49 households at-risk of homelessness
Location Description	City-wide	
Planned Activities	The Latin American Community Center's Homelessness Prevention services targets individuals who are at-risk of becoming homeless if they do not receive financial support. Clients must show evidence of financial need such as an overdue utility bill, letter from landlord/mortgage holder, or eviction notice. Services include short- and medium-term rental assistance, security deposits, advance payment of previous month's rent, and utility deposits and payments. Wraparound services will also be provided, such as job search and placement assistance, English as a Second Language classes, and referrals to the United Way's \$tand By Me Financial Literacy Program to establish long-term financial stability.	
32	Project Name	Lutheran Communtiy Services
	Target Area	City-wide

	Goals Supported	Provide housing/services to the homeless and near-homeless population
	Needs Addressed	Services for Special Needs
	Funding	CDBG: \$20,000
	Description	Homelessness Prevention services
	Target Date	7/1/2022
	Estimate the number and type of families that will benefit from the proposed activities	
	Location Description	City-wide
	Planned Activities	Grants to assist income-eligible families with utilities, back rent, mortgage, or security deposits.
33	Project Name	Neighborhood House, Inc. - Homeless Prevention and Family Services
	Target Area	City-wide
	Goals Supported	Provide housing/services to the homeless and near-homeless population
	Needs Addressed	Services for Special Needs
	Funding	CDBG: \$10,000
	Description	Homeless Prevention and Family Services
	Target Date	7/1/2022
	Estimate the number and type of families that will benefit from the proposed activities	1,000 low- to moderately low-income households
	Location Description	City-wide
Planned Activities	Program assisting low- to moderately low-income households with crisis alleviation to prevent eviction and utility shutoffs. Additional services, such as a food pantry, after-school programs, financial empowerment workshops and daycare help address immediate needs. Homes in foreclosure will enter Neighborhood House's housing counseling division.	
34	Project Name	Neighborhood House, Inc. - Housing Intervention and Outreach Counseling
	Target Area	City-wide
	Goals Supported	Provide housing/services to other special needs populations
	Needs Addressed	Services for Special Needs
	Funding	CDBG: \$7,500
	Description	Housing Intervention and Outreach Counseling
	Target Date	7/1/2022
	Estimate the number and type of families that will benefit from the proposed activities	33 households
	Location Description	City-wide
Planned Activities	Comprehensive housing counseling services in the areas of: pre-purchase, homebuyer education workshops, foreclosure intervention and prevention, rental counseling, and	

		Financials Empowerment sessions and workshops. Services are provided in-house and off-site and in English and Spanish to meet the needs of the consumer.
35	Project Name	Sojourners Place
	Target Area	City-wide
	Goals Supported	Provide housing/services to the homeless and near-homeless population
	Needs Addressed	Services for Special Needs
	Funding	CDBG: \$22,500
	Description	Transitional housing
	Target Date	7/1/2022
	Estimate the number and type of families that will benefit from the proposed activities	70 homeless adults
	Location Description	City-wide
	Planned Activities	Long-term transitional housing to homeless adults providing comprehensive services addressing issues such as addiction, mental/physical health, incarceration, and a combination of these factors. Housing, meals, intensive case-management, job readiness/ training/ placement, education, and life skills trainings are provided to prevent future homelessness.
36	Project Name	Family Counseling Center of St. Paul (FCCSP)
	Target Area	City-wide
	Goals Supported	Provide projects/activities for eligible youth and families
	Needs Addressed	Help all residents meet basic social and economic needs
	Funding	CDBG: \$13,368
	Description	Healing Families, Transforming Communities- Expanding the Continuum of Care through Trauma-based Services
	Target Date	7/1/2022
	Estimate the number and type of families that will benefit from the proposed activities	203 limited English proficiency households, underserved, impoverished, uninsured, or under-insured communities in Wilmington.
Location Description	City-wide	
Planned Activities	The project will address the severe shortage of bilingual (Spanish-speaking) culturally-responsive mental and behavioral health counseling and case management services available to treat residents of underserved, impoverished, uninsured, or under-insured communities in Wilmington.	
37	Project Name	STEHM, Inc. - Direct Case Management Services
	Target Area	City-wide
	Goals Supported	Provide housing/services to the homeless and near-homeless population
	Needs Addressed	Services for Special Needs
	Funding	CDBG: \$10,000

	Description	Direct Case Management Services
	Target Date	7/1/2022
	Estimate the number and type of families that will benefit from the proposed activities	14 low-income homeless persons
	Location Description	City-wide
	Planned Activities	Provide emergency and transitional housing and case management services for low-income homeless persons in the City of Wilmington. Training and counseling are provided to transition clients into independent living situations. Motel vouchers in dire need of emergency shelter are provided through the Motel Ministry program.
38	Project Name	The Salvation Army - Code Purple
	Target Area	City-wide
	Goals Supported	Provide housing/services to the homeless and near-homeless population
	Needs Addressed	Services for Special Needs
	Funding	CDBG: \$13,414
	Description	Code Purple
	Target Date	7/1/2022
	Estimate the number and type of families that will benefit from the proposed activities	200 homeless men, women, and families
	Location Description	City-wide
	Planned Activities	The program addresses immediate needs of homeless men, women, and families when the weather meets certain criteria, such as extreme cold and/or snow, ice, and winds that are judged as severe.
39	Project Name	The Wilmington HOPE Commission, Inc. - Re-Entry Services
	Target Area	City-wide
	Goals Supported	Provide housing/services to other special needs populations
	Needs Addressed	Services for Special Needs
	Funding	CDBG: \$6,000
	Description	Re-entry services
	Target Date	7/1/2022
	Estimate the number and type of families that will benefit from the proposed activities	285 justice-involved individuals
	Location Description	19801, 19802, and 19805 zip codes
	Planned Activities	A comprehensive range of evidence-based services to individuals released from prison to ensure their successful reentry into the 19801, 19802, and 19805 zip codes. Supportive services include utility assistance, housing security deposits, driver's license fees, GED tests fees, birth certificate fees, transportation assistance, assistance with fines and fees, and a workforce development program.

40	Project Name	West End Neighborhood House Inc - Life Lines
	Target Area	City-wide
	Goals Supported	Provide housing/services to other special needs populations
	Needs Addressed	Services for Special Needs
	Funding	CDBG: \$12,500
	Description	Life Lines program
	Target Date	7/1/2022
	Estimate the number and type of families that will benefit from the proposed activities	31 emancipated foster care youth
	Location Description	City-wide
Planned Activities	Life Lines serve to improve the quality of life for emancipated foster care youth by offering a safe, nurturing home environment while empowering residents by teaching them the tools needed to be self-sufficient adults. Services include intensive case management and support using Trauma Informed Care methodology, educational assistance, employment preparation and placement assistance, mental health and drug and alcohol treatment resources and support.	
41	Project Name	YMCA of Delaware - Supportive Housing
	Target Area	City-wide
	Goals Supported	Provide housing/services to other special needs populations
	Needs Addressed	Services for Special Needs
	Funding	CDBG: \$20,000
	Description	Central YMCA Male Supportive Housing Program
	Target Date	7/1/2022
	Estimate the number and type of families that will benefit from the proposed activities	300 low-income veterans, homeless men, men with mental health and/or substance abuse issues, and other disabling conditions
	Location Description	City-wide
Planned Activities	The Central YMCA Male Supportive Housing Program provides 180 single-occupancy units for men of all walks of life in need of safe and stable housing. Supportive programs provide needs for low-income veterans, homeless men, men with mental health and/or substance abuse issues, and other disabling conditions. Services include financial assistance, social services, partnerships with healthcare provider to provide education and workshops, and other services to set clients on the path to self-sufficiency.	
42	Project Name	YWCA Delaware, Inc. - Home-Life Management Center
	Target Area	City-wide
	Goals Supported	Provide housing/services to other special needs populations
	Needs Addressed	Services for Special Needs

	Funding	CDBG: \$20,625
	Description	YWCA Delaware's Home-Life Management Center (HLMC)
	Target Date	7/1/2022
	Estimate the number and type of families that will benefit from the proposed activities	80 homeless families and individuals escaping domestic and sexual violence.
	Location Description	City-wide
	Planned Activities	YWCA Delaware's Home-Life Management Center (HLMC) provides quality emergency and transitional housing, coupled with comprehensive case management and supportive wraparound services, to homeless families and those escaping domestic and sexual violence in the City of Wilmington.
43	Project Name	Christiana Cultural Arts Center, Inc. - Future Entrepreneurs
	Target Area	City-wide
	Goals Supported	Provide projects/activities for eligible youth and families
	Needs Addressed	Help all residents meet basic social and economic needs
	Funding	CDBG: \$10,000
	Description	Future Entrepreneurs in Creative Industries Program
	Target Date	7/1/2021
	Estimate the number and type of families that will benefit from the proposed activities	5 at-risk youth between the ages of 16 to 18 years-old
	Location Description	City-wide
Planned Activities	The program provides at-risk youth between the ages of 16 to 18 years with workforce development and life skills, including a paid internship providing hands-on experience that may lead to permanent placement. Arts workshops in music, dance, writing, and visual arts are also offered in the fall, along with quarterly community service projects.	
44	Project Name	Christiana Cultural Arts Center, Inc. - Heart Under The Hoodie
	Target Area	City-wide
	Goals Supported	Provide projects/activities for eligible youth and families
	Needs Addressed	Help all residents meet basic social and economic needs
	Funding	CDBG: \$10,000
	Description	Heart Under The Hoodie, Youth Violence Prevention Program
	Target Date	7/1/2021
	Estimate the number and type of families that will benefit from the proposed activities	115 youths
	Location Description	City-wide
Planned Activities	The after school youth program provides youth a platform to explore and develop critical life and social skills through the arts. The four-week program provides	

		structured, educational activities including improv, yoga/mindfulness, and a choice of two art forms - music, dance, writing/journaling, or visual art.
45	Project Name	Delaware Futures - One Student At A Time
	Target Area	City-wide
	Goals Supported	Provide projects/activities for eligible youth and families
	Needs Addressed	Help all residents meet basic social and economic needs
	Funding	CDBG: \$5,000
	Description	One Student At A Time program
	Target Date	7/1/2022
	Estimate the number and type of families that will benefit from the proposed activities	60 economically disadvantaged high school students
	Location Description	City-wide
	Planned Activities	Success, One Student At A Time provides academic, social, and motivational support and cultural enrichment that empowers economically disadvantaged high school students to recognize and fulfill their unrealized potential. Funds will be used for tutors and instructors to deliver high quality academic enrichment, as well as funds to support college tours, group mentoring and parent education sessions, community service, cultural exploration, program supplies, and refreshments.
46	Project Name	Duffy's Hope - Youth Ambassador Program
	Target Area	City-wide
	Goals Supported	Provide projects/activities for eligible youth and families
	Needs Addressed	Help all residents meet basic social and economic needs
	Funding	CDBG: \$2,000
	Description	Youth Ambassador Program
	Target Date	7/1/2022
	Estimate the number and type of families that will benefit from the proposed activities	50 children of predominately single-parent or grandparent head of households
Location Description	City-wide	
Planned Activities	The Youth Ambassador Program assists children of predominately single-parent or grandparent head of households by providing a structured after-school program centered on prevention, mentoring, and support to lead them toward a productive future	
47	Project Name	Reach Riverside - Empower
	Target Area	City-wide
	Goals Supported	Provide projects/activities for eligible youth and families
	Needs Addressed	Help all residents meet basic social and economic needs
	Funding	CDBG: \$1,000

	Description	Economic Mobility Places Ownership Within Everyone's Reach (EMPOWER) program
	Target Date	7/1/2022
	Estimate the number and type of families that will benefit from the proposed activities	
	Location Description	City-wide
	Planned Activities	Services include: employment coaching, tutoring, job matching and placement, financial coaching, health screenings, health improvement plans and family support services like emergency food and clothing, childcare and mental health counseling.
48	Project Name	Kingswood Community Center - Jimmy Jenkins
	Target Area	City-wide
	Goals Supported	Provide projects/activities for eligible youth and families
	Needs Addressed	Help all residents meet basic social and economic needs
	Funding	CDBG: \$1,000
	Description	Jimmy Jenkins Senior Center programs
	Target Date	7/1/2022
	Estimate the number and type of families that will benefit from the proposed activities	
	Location Description	City-wide
	Planned Activities	The Jimmy Jenkins Senior Center provides daily transportation and activities for our seniors to support aging-in-place and good health outcomes. Activities include recreational activities such as bowling, art classes, arts and culture trips, and health information sessions.
49	Project Name	Latin American Community Center - Youth Prevention
	Target Area	CDBG-eligible areas
	Goals Supported	Provide projects/activities for eligible youth and families
	Needs Addressed	Help all residents meet basic social and economic needs
	Funding	CDBG: \$15,000
	Description	Youth Achievement Center
	Target Date	7/1/2022
	Estimate the number and type of families that will benefit from the proposed activities	75 youths ages 12-18 years from low-income, inner-city minority households
	Location Description	CDBG-eligible areas
	Planned Activities	The Youth Achievement Center serves youth ages 12-18 years from low-income, inner-city, minority households considered at-risk of gang recruitment, bullying, substance use, and dropping out of school. This program provides a safe haven for these youth through educational, enrichment, and physical activities. Hot meals,

		tutoring and homework help, workforce development training, and activities supporting other interests are provided.
50	Project Name	Tech Impact - IT Works
	Target Area	CDBG-eligible areas
	Goals Supported	Provide projects/activities for eligible youth and families
	Needs Addressed	Help all residents meet basic social and economic needs
	Funding	CDBG: \$5,000
	Description	IT Works Technology Job Training Program for At-Risk Young Adults
	Target Date	7/1/2022
	Estimate the number and type of families that will benefit from the proposed activities	21 young adults at-risk of lifelong poverty
	Location Description	CDBG-eligible areas
	Planned Activities	Tech Impact is an innovative technology education and job training program addressing the unemployment and underemployment of young adults at-risk for lifelong poverty. The free program provides at-risk young adults educational career training opportunities in both hard and soft skills to become gainfully employed.
51	Project Name	Teen Warehouse - Teens In Motion
	Target Area	City-wide
	Goals Supported	Provide projects/activities for eligible youth and families
	Needs Addressed	Help all residents meet basic social and economic needs
	Funding	CDBG: \$7,500
	Description	Teens In Motion
	Target Date	7/1/2022
	Estimate the number and type of families that will benefit from the proposed activities	55 teens aged 13-19 years
Location Description	City-wide	
Planned Activities	The Warehouse serves teens aged 13 to 19 with a range of programs that encourage discovery, empowerment, and ambition to help prepare teens for the workforce and higher education opportunities.	
52	Project Name	The Challenge Program - Construction Training Program
	Target Area	CDBG-eligible areas
	Goals Supported	Provide projects/activities for eligible youth and families
	Needs Addressed	Help all residents meet basic social and economic needs
	Funding	CDBG: \$30,000
	Description	The Challenge Program
Target Date	7/1/2022	

	Estimate the number and type of families that will benefit from the proposed activities	40 youths ages 17-24 years from low-income communities
	Location Description	CDBG-eligible areas
	Planned Activities	The Challenge Program provides education and job training for high-risk youth ages 17-24 years from low-income communities. Trainees participate in hands-on, paid construction training on projects which including rehabbing residential properties and greening of vacant lots to eliminate blight and increase affordable housing options in low-income communities.
53	Project Name	West End Neighborhood House Inc - Above Xpectatons
	Target Area	City-wide
	Goals Supported	Provide projects/activities for eligible youth and families
	Needs Addressed	Help all residents meet basic social and economic needs
	Funding	CDBG: \$3,000
	Description	Above Xpectatons Track program
	Target Date	7/1/2022
	Estimate the number and type of families that will benefit from the proposed activities	145 young people from disadvantaged circumstances
	Location Description	City-wide
	Planned Activities	Above Xpectations provides young people from disadvantaged circumstances the opportunity to compete in world class track and field competitions and, more importantly, prepare them for post-secondary education. The program reaches out to parents of the current team members and periodically conducts instructional and training workshops at local schools.
54	Project Name	YMCA of Delaware - Teen Engagement
	Target Area	City-wide
	Goals Supported	Provide projects/activities for eligible youth and families
	Needs Addressed	Help all residents meet basic social and economic needs
	Funding	CDBG: \$10,500
	Description	YMCA Teen Engagement Program
	Target Date	7/1/2022
	Estimate the number and type of families that will benefit from the proposed activities	400 teens ages 13-18 years
Location Description	City-wide	
Planned Activities	Year-round youth programming for Wilmington teens ages 13-18 at the Walnut Street YMCA. Opportunities include enrichment programs for homework help, step club, drumline, workforce development, Black Achievers, Youth in Government, and more.	

	During the Summer, free access to the YMCA Teen Center is provided along with teen programming that includes field trips, worksite visits, and on-the-job experience.
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DRAFT

AP-50 Geographic Distribution – 91.220(f)

Description of the geographic areas of the entitlement (including areas of low-income and minority concentration) where assistance will be directed

The City of Wilmington overall has a significant number of low- and moderate-income persons, consisting of 39.7% of all Wilmington residents. As a result, a majority of city-wide projects will provide benefits to low- and moderate income households. Low- to moderate-income block groups and racially/ethnically concentrated areas of poverty (R/ECAPs) have been identified to determine areas with the most need.

Geographic Distribution

Target Area	Percentage of Funds
City-wide	100%

Table 8 - Geographic Distribution

Rationale for the priorities for allocating investments geographically

Use of funds specifically directed to CDBG-eligible areas is limited. However, the majority of city-wide projects are intended to provide benefits to low- and moderate-income households. Additionally, areas of higher opportunity are selected for certain projects to deconcentrate poverty and improve access to opportunities for low- and moderate-income households.

Affordable Housing

AP-55 Affordable Housing – 91.220(g)

Introduction

One Year Goals for the Number of Households to be Supported	
Homeless	15
Non-Homeless	181
Special-Needs	0
Total	196

Table 9 - One Year Goals for Affordable Housing by Support Requirement

One Year Goals for the Number of Households Supported Through	
Rental Assistance	15
The Production of New Units	136
Rehab of Existing Units	45
Acquisition of Existing Units	0
Total	196

Table 10 - One Year Goals for Affordable Housing by Support Type

AP-60 Public Housing – 91.220(h)

Introduction

The WHA manages and maintains 1,816 units, with 1,390 units occupied. While most of these properties are in areas of concentrated poverty and/or minorities, most of Wilmington also falls within these categories. Demand for public housing far outweighs supply of housing; the waiting list for public housing is closed. WHA is looking at other financing sources and housing opportunities to fulfill the demand for affordable housing.

Actions planned during the next year to address the needs to public housing

The following strategies were outlined in WHA's most recent updated to their five-year and annual plan:

- Maximize the number of affordable units available to the PHA within its current resources by expediting repairs, constant monitoring, implementing energy efficiency programs, expedite the issuing, processing, and transition of HCV holders, and setting reasonable payment standards and occupancy standards
- Increase the number of affordable housing units by applying for additional Section 8 units should they become available, pursue housing resources other than public housing or Section 8, replace units lost through the Section 32 Homeownership Program and mixed finance development, and use Replacement Housing Factor funds to construct/purchase new affordable housing
- Target available assistance to families by continuing admissions preferences aimed at working families, enforcing rent policies supporting and encouraging work, apply for special-purpose vouchers for the elderly and persons with disabilities, carry out modifications based on Section 504 needs, and affirmatively marketing to local nonprofits that assist families with disabilities
- Conduct activities to affirmatively further fair housing by joining the Delaware State Consortium on Affirmatively Furthering Fair Housing, counseling and assisting Section 8 tenants on units available outside of racially and ethnically concentrated areas of poverty (R/ECAPs), and market the Section 8 program to owners residing outside of R/ECAPs.

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

Each public housing property has a resident advisory board to discuss and make recommendations on PHA plans. Additionally, WHA has a Resident Services Department that partners with community agencies to provide vital services for clients at Crestview Apartments.

Services include a job-resource library, hands-on instruction in using computers, financial literacy, homeownership counseling, and access to health and social service professionals. These services serve to give clients the opportunity share information, network, and grow as individuals to become employable and live independently.

If the PHA is designated as troubled, describe the manner in which financial assistance will be provided or other assistance

WHA is not designated as troubled.

AP-65 Homeless and Other Special Needs Activities – 91.220(i)

Introduction

Describe the jurisdictions one-year goals and actions for reducing and ending homelessness including

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

The City maintains support for the YMCA, YWCA, Catholic Charities, Ministry of Caring, Homeless Planning Council, Family Promise, Connection CSP and Salvation Army, which work together to provide outreach to the homeless population, including unsheltered persons. Several of the nonprofit social and human service agencies that provide services to the homeless and those at risk of becoming homeless leverage additional private funds used to operate emergency shelters, transitional housing facilities, and supportive housing facilities within Wilmington. These funds are also used to provide supportive services such as case management, counseling, job training, and life skills classes.

Addressing the emergency shelter and transitional housing needs of homeless persons

Wilmington is a member of the Delaware Continuum of Care (CoC), the primary program in the State addressing homelessness led by Housing Alliance Delaware. In their most recent 2019 report on “The State of Housing in the First State,” Housing Alliance Delaware identified that 68% of homeless individuals that experienced homelessness in 2018 were homeless for the first time.

Housing Alliance Delaware administers Centralized Intake services to coordinate access to emergency shelter, rapid re-housing, and permanent supportive housing. The CoC practices a Housing First model, providing shelter for individuals regardless of personal hardships or circumstances. Homeless services can be accessed through the Delaware 211 hotline, State Service Centers, or local homeless service providers such as a shelter or day center. According to Housing Alliance Delaware’s CI Annual Report FY2018, over 30,000 unduplicated inquiries for assistance were made with 211 calls being the most common method of access (28,140 inquiries). Additionally, according to the stakeholder survey, transitional and permanent housing for individuals experiencing homelessness was the second highest priority housing activity.

In FY2018, 21,637 referrals were made to emergency shelters. However, only 62% of referrals saw clients entering shelters. Cancelled or denied referrals were primarily a result of referred

persons not arriving on the site of the shelter. This may indicate gaps in addressing special needs, safety concerns, or strict shelter policies and hours.

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

Housing Alliance Delaware identified that 46% of homeless households in the State exited permanently to housing between 2015 and 2018. Supportive services including health, mental health, and employment services are provided for a wide range of special needs through various homeless service providers in Wilmington. These programs serve to not only provide immediate shelter but also help homeless individuals obtain future permanent housing by providing job and life skills training, case management services, educational opportunities, and other supportive services that allow them to pursue these opportunities. The following agencies address the homeless, special needs population by subpopulation:

Families

Family Promise of Northern New Castle County (FPNCC) is a nonprofit with a mission of preventing and ending homelessness for families. Their primary goals to transition the families using their services to permanent housing in less than sixty days. In November 2018, FPNCC opened their Hospitality Center, providing temporary shelter for up to six families (or 20 individuals). FPNCC's other facility, the Day Center, can also house six families. Strongly volunteer-driven, services include mentorship, case management, financial literacy courses, job assistance, housing assistance, and advocacy.

Veterans

The Delaware Center for Homeless Veterans (DCHV) provides safe and affordable permanent housing for veterans. DCHV also provides supportive services to reintegrate and educate homeless veterans and their families to obtain recovery, self-sufficiency, independence, and community integration. Additionally, outreach for recruiting more landlords willing to accept HCVs is conducted to expand housing options for veterans.

Unaccompanied Youth

CHILD, Inc is a nonprofit serving dependent, neglected, and abused children and their parents since 1963. The mission of their Governor Terry Children's Center is to "reduce the possibility,

incidence, or reoccurrence of child abuse or neglect by providing an emergency home, food, clothing and age-appropriate counseling to children, ages six through seventeen years.” The Center offers 10-beds for a maximum 30-day stay. Supportive services include psychosocial assessment, individual counselling, advocacy, referrals, collateral involvement, and therapeutic family interactions. Transportation to and from school, group activities, evening study time, and recreational activities are offered to help provide a home-like environment. CHILD, Inc also operates an anger management program for youth, a specialized foster care program, 24-hour runaway and homeless youth hotline, and counseling and mediation services for families dealing with divorce, separation, custody, or visitation issues.

Helping low-income individuals and families avoid becoming homeless, especially extremely low-income individuals and families and those who are: 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); or, receiving assistance from public or private agencies that address housing, health, social services, employment, education, or youth needs.

The highest risk of returning to homelessness after moving into housing occurs in the first twelve according to Housing Alliance Delaware’s most recent report. As a result, availability of services is most critical in the first year after returning to housing. The services mentioned previously also serve to help formerly individuals from becoming homeless again and maintain permanent housing. Additionally, stakeholders frequently mentioned the need for wraparound services to prevent homeless individuals from re-entering the system. Many of the projects providing homelessness prevention services for the upcoming program year intend to implement wraparound services.

AP-70 HOPWA Goals– 91.220 (I)(3)

One year goals for the number of households to be provided housing through the use of HOPWA for:	
Short-term rent, mortgage, and utility assistance to prevent homelessness of the individual or family	40
Tenant-based rental assistance	109
Units provided in permanent housing facilities developed, leased, or operated with HOPWA funds	16
Units provided in transitional short-term housing facilities developed, leased, or operated with HOPWA funds	10
Total	175

AP-75 Barriers to affordable housing – 91.220(j)

Introduction:

Stakeholders reiterated the lack of quality jobs and homes makes affordable housing unobtainable for many Wilmington residents. Other needs such as childcare, physical disabilities, and mental disabilities further restrict affordable housing options for many residents.

Developers cite high costs for new construction as their biggest barrier to developing affordable housing. Wilmington is almost entirely developed, making new construction costly. There is a need for sufficient secondary subsidies if the City wants to pursue new construction. As a result, rehabilitation will be the primary focus for generating new affordable housing options, especially due to the age of housing in the City. It is also important to note that funding is limited in terms of quantity and flexibility. The City is look for additional funding sources to expand the scope of projects they can pursue. For HCV holders, It is also difficult for voucher holders to find quality affordable housing in high-opportunity areas in the private real estate market, and many port out of Wilmington as a result.

Actions it planned 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

In Wilmington’s 2028 Comprehensive Plan, the City sets forth a goal to “ensure all residents have access to quality housing that is affordable and offers choice.” The goal identifies a need to both retain and attract diverse residents, with lower income residents facing difficulties in securing and maintaining housing. To strengthen their communities, Wilmington looks to not only promote pathways to maintain and improve homeownership, but also provide a broader range of housing choices through new affordable housing development, new housing products, and promoting incentives and programs for the purchase and rehabilitation of existing housing stock.

The City’s Department of Real Estate and Housing offers a Home Repair Loan Program for families below 80% AMI who are looking to improve their homes by bringing them up to code. The loan can be used for heating, roofing, plumbing, electrical, handicapped facilities, and any other emergency needs. A similar program is offered for exterior code violation repairs, which has a maximum value of \$4,999 but will be forgiven after one year if there is no change in property ownership. As previously mentioned, the City will also pursue rehabilitation and infill development for affordable rental and owner-occupied housing in partnership with CHDOs and other developers.

AP-85 Other Actions – 91.220(k)

Introduction:

Over the next year, Wilmington plans the following actions to help address the housing and community development needs of City residents, especially low and moderate-income residents.

Actions planned to address obstacles to meeting underserved needs

The City will continue to cooperate with various non-profit agencies and developers to implement its Five-Year Strategy and to address the specific needs of special needs populations identified in the plan. One of the strengths of the delivery system is the existing collaborative network of service providers and housing providers. This includes the CoC, nonprofit and private developers, and other government agencies. In addition, the Department of Real Estate and Housing provides an experienced staff and well-organized program for initiating public programs that can be affirmatively marketed to special needs populations and persons experiencing homelessness. Assistance to support recovery from the COVID-19 pandemic will also continue to be provided.

Actions planned to foster and maintain affordable housing

In FY 2021, 90% of HOME funds will be allocated toward the rehabilitation of rental and homeowner housing units and new construction. Additionally, CDBG funds will be used to facilitate implementation of the City's commercial and residential façade program, home rehabilitation, demolition/disposition, and other programs to help maintain affordable housing.

Actions planned to reduce lead-based paint hazards

On September 30, 2019, new Castle County was awarded \$3.3 million through HUD's Lead-Hazard Reduction Grant Program and a \$300,000 supplemental grant for a Healthy Homes Program. These grants will allow New Castle County to conduct lead abatement on over 130 homes. Priority will be given to households with pregnant women or children under the age of six, low- and moderate-income households, homes built before 1978, properties already confirmed to contain lead-based paint hazards, and six specific zip codes identified to be at high risk of lead-based paint hazards. Zip codes in Wilmington include: 19801/Southbridge, 19802/Northeast, 19805/West Side/Hilltop, and 19806/West Wilmington. The remaining two zip codes, 19703/Claymont and 19720/New Castle, border Wilmington's city limits.

Eligible families will receive a Lead Risk Assessment for their homes. If the home is tested positive for lead, the program will relocate the family for up to ten days while the lead paint is

being removed, along with fixing any additional health hazards found during the assessment. Each zip code will contain fully furnished units to accommodate relocated families.

Actions planned to reduce the number of poverty-level families

The City of Wilmington and local service providers have developed goals, programs, and policies to reduce poverty and improve access to affordable housing. In Wilmington's 2028 Comprehensive Plan, which was updated in July 2019, the City set forth a goal area for the creation of "Strong and Safe Neighborhoods." Goals under this umbrella addressing poverty and its effects include promoting walkable neighborhoods to improve access to jobs, services, and amenities; increasing access to quality housing that is affordable and offers choice; reducing neighborhood blight and crime; ensuring neighborhoods have access to high quality, welcoming public spaces and recreation; and supporting neighborhood character cohesion and pride. Established programs that will be continued or created to address this goal include the Neighborhood Stabilization Program, the Wilmington Community Advisory Committee, and partnerships with between local businesses, institutions, and organizations.

The Wilmington HOPE Commission serves to reduce "the impact of violence and promote well-being in [the Wilmington] communities by advocating for, supporting, empowering, and assisting ex-offenders to positively integrate back into [their] communities." Re-entry services are important to re-integrating justice-involved individuals who are more likely to face economic and life-altering burdens as a result of a criminal record, along with returning to their original circumstances that led to their criminal record.

Programs offered by the HOPE Commission include the Enhanced Workforce Development Program (EWFD), and the Winner's Circle. EWFD is a free twelve-week comprehensive program teaching basic workforce development skills such as presentation, interview skills, and resume writing along with how to maintain employment and other key employment skills. The Winner's Circle is a peer-led, peer-drive support group that draws on real experience to motivate others during the re-entry process.

These poverty reducing measures serve improve access to affordable housing choice by preventing and mitigating the effects of poverty. Stakeholders mention high eviction rates and inability to obtain quality employment and wages as major barriers to obtaining affordable housing. The HOPE Commission's re-entry programs directly mitigate these barriers for the formerly incarcerated, and the RISE programs serves to prevent these effects through youth engagement. The City is looking to develop new measures and strategies to create more resilient communities, as outlined in their comprehensive plan.

Actions planned to develop institutional structure

To address the shortage of affordable housing options by improving service delivery, both the City and WHA are pursuing options to increase supply. The City is continuing rehabilitation and home repair efforts along with partnerships with local developers to efficiently make use of federal and non-federal dollars. WHA is planning to apply for additional Section 8 units should they become available, pursue other housing resources besides public housing or Section 8 tenant-based vouchers, replace lost public housing units using the Section 32 Homeownership Program and mixed finance development, and use Replacement Housing Factor funds for acquisition and new construction

Actions planned to enhance coordination between public and private housing and social service agencies

The City will continue to cooperate with various non-profit agencies and developers to address the specific needs of special needs populations identified in the plan. One of the strengths of the delivery system is the existing collaborative network of service providers and housing providers. This includes the CoC, nonprofit and private developers, and other government agencies. In addition, the Department of Real Estate and Housing provides an experienced staff and well-organized program for initiating public programs that can be affirmatively marketed to special needs populations and persons experiencing homelessness.

Discussion:

Program Specific Requirements

AP-90 Program Specific Requirements – 91.220(I)(1,2,4)

Introduction:

**Community Development Block Grant Program (CDBG)
Reference 24 CFR 91.220(I)(1)**

Projects planned with all CDBG funds expected to be available during the year are identified in the Projects Table. The following identifies program income that is available for use that is included in projects to be carried out.

1. The total amount of program income that will have been received before the start of the next program year and that has not yet been reprogrammed	0
2. The amount of proceeds from section 108 loan guarantees that will be used during the year to address the priority needs and specific objectives identified in the grantee's strategic plan	0
3. The amount of surplus funds from urban renewal settlements	0
4. The amount of any grant funds returned to the line of credit for which the planned use has not been included in a prior statement or plan.	0
5. The amount of income from float-funded activities	0
Total Program Income	0

Other CDBG Requirements

1. The amount of urgent need activities	0
2. The estimated percentage of CDBG funds that will be used for activities that benefit persons of low and moderate income. Overall benefit – A consecutive period of one, two, or three years may be used to determine that a minimum of 70% of CDBG funds is used to benefit persons of low and moderate income. Specify the years covered that include this Annual Action Plan.	100%

HOME Investment Partnership Program (HOME)
Reference 24 CFR 91.220(l)(2)

1. A description of other forms of investment being used beyond those identified in Section 92.205 is as follows:

The City of Wilmington does not intend to use other forms of investment to fund HOME programs.

2. A description of the guidelines that will be used for resale or recapture of HOME funds when used for homebuyer activities as required in 92.254, is as follows:

In addition to the following information, the City of Wilmington's Program Policies and Procedures Manual and HOME Resale and Recapture Policy is also attached.

The City of Wilmington imposes resale restrictions on the total HOME investment, which includes direct acquisition, construction, or development contributions, soft costs, and project delivery costs (if any) made to both the developer and the homebuyer. Resale restrictions require deed restrictions and covenants, which are attached to the property and restrict the homeowner's sale of the property (during the period of affordability) only to a low-income family that will use the property as their principle residence. The term "low income family" shall mean a family whose gross annual income does not exceed 80% of the median family income for the geographic area as published annually by HUD. As a guideline, the purchasing family should pay no more than 30% of its gross family income towards principal, interest, taxes, and insurance for a property on a monthly basis. The housing must remain affordable to a reasonable range of low-income buyers for the period described in the HOME regulations. At a minimum, the subsequent property owner will be subject to the remaining affordability period on the property. Resale guidelines are allowed in situations where there is a development subsidy only. If the homeowner receives a homebuyer subsidy, then the recapture guidelines must be followed. The original homebuyer, now the seller, must receive a "fair return" on their investment, which is defined as the homebuyer's initial investment of down payment and settlement costs and the cost of any capital improvements.

Recapture Guidelines

The amount of HOME funds subject to recapture is based on the amount of HOME assistance that enabled the homebuyer to buy the dwelling unit. This includes any assistance that reduced the purchase price from the fair market value to an affordable price, but excludes the amount between the cost of producing the unit and the market value (development subsidy). For first-time homeowner loans, the City of Wilmington has adopted the recapture method, with forgiveness, based on the length of time the homebuyer occupies the home in relation to the affordability period.

Lease Purchase

The City of Wilmington has adopted a lease/purchase policy for the federally funded projects including CDBG and HOME. A copy of the policy is available for public inspection at the City of Wilmington Department of Real Estate and Housing.

In addition, information may be received from The Department of Real Estate and Housing's HOME Policy and Procedure manual.

3. A description of the guidelines for resale or recapture that ensures the affordability of units acquired

with HOME funds? See 24 CFR 92.254(a)(4) are as follows:

See previous question.

4. Plans for using HOME funds to refinance existing debt secured by multifamily housing that is rehabilitated with HOME funds along with a description of the refinancing guidelines required that will be used under 24 CFR 92.206(b), are as follows:

Not applicable. The City does not plan to refinance any existing debt secured by multi-family housing that is being rehabilitated with HOME funds.

**Emergency Solutions Grant (ESG)
Reference 91.220(l)(4)**

1. Include written standards for providing ESG assistance (may include as attachment)

See attached written standards and the RFP process in the Appendix.

2. If the Continuum of Care has established centralized or coordinated assessment system that meets HUD requirements, describe that centralized or coordinated assessment system.

Beginning in 2014, all communities receiving homeless assistance funds from the U.S. Department of Housing and Urban Development (HUD) are required to have a coordinated process by which households experiencing homelessness are assessed and prioritized for services and housing. Housing Alliance Delaware administers Centralized Intake in partnership with a variety of homeless assistance providers throughout the state. Centralized intake services can be accessed through the following methods:

- Direct phone call to CI staff at Housing Alliance DE
- Delaware 211 hotline
- State service center
- Local shelters or day centers

Clients are assessed in-person using VI-SPDATs (Vulnerability-Index Service Prioritization Decision Assistance Tool) as a triage tool to determine the most appropriate housing intervention. Assessment prioritizations are conducted as follows according to CI Policies and Procedures:

A. Emergency Shelter

Entry into emergency shelter, is not prioritized based on the severity of service needs of clients/households. Any client who is literally homeless can be referred for an opening at a shelter. No vulnerability assessment is needed for referral to emergency shelter.

Entry into emergency shelter is prioritized for households who are currently sleeping in a place not meant for human habitation (car, park, abandoned building, tent, street, etc).

Intake staff keep a daily log of households that report living in an unsheltered situation and follow up with those clients each day to determine if they are still in need of shelter and offer open shelter beds to those households first each day.

B. Permanent Housing Resources

Entry into Rapid Rehousing (RRH) and Permanent Supportive Housing (PSH) programs is prioritized by severity of service need. Centralized Intake refers directly to Rapid Re-Housing (RRH) and Permanent Supportive Housing (PSH) resources in all 3 counties in Delaware. The VI-SPDAT (Vulnerability Index - Service Prioritization Decision Assistance Tool) is Delaware's standard assessment tool. Clients and households are prioritized for RRH and PSH in Delaware based on the severity of their service needs - as determined by the VI-SPDAT - and in alignment with the Delaware CoC's RRH and PSH program standards. Once HAD staff receives the VI-SPDAT the score is recorded, along with identifying information, client location, household

composition, veteran status, and other pertinent information as necessary. HAD staff reviews responses in the VI-SPDAT and all other available information, including the client's profile in CMIS, to assess if the client may meet the criteria for chronic homelessness (as defined by HUD). All PSH resources in Delaware are prioritized or dedicated to serving people experiencing chronic homelessness. If the client appears to meet the criteria for chronic homelessness, the client will be assessed by a Housing Specialist to see if they are indeed chronically homeless. If they are, they are added to the Permanent Supportive Housing (PSH) priority list in CMIS. Housing Specialists work to assist these clients with obtaining the proper documentation to verify their chronic homeless status. In some cases, full documentation is not required in order to be referred to a PSH program. Any household that is not chronically homeless is added to the RRH prioritization list.

C. Transitional Housing

Entry into Transitional Housing (TH) is prioritized by severity of service need, which is determined – in part – by VI-SPDAT score. Centralized Intake refers directly to two TH providers in New Castle County that serve households with minor children. Households are identified as potential candidates for open units of TH from the RRH by-name priority list.

3. Identify the process for making sub-awards and describe how the ESG allocation available to private nonprofit organizations (including community and faith-based organizations).

See attached written standards and the RFP process in the Appendix.

4. If the jurisdiction is unable to meet the homeless participation requirement in 24 CFR 576.405(a), the jurisdiction must specify its plan for reaching out to and consulting with homeless or formerly homeless individuals in considering policies and funding decisions regarding facilities and services funded under ESG.

See attached written standards and the RFP process in the Appendix.

5. Describe performance standards for evaluating ESG.

Each program is reviewed for meeting project goals and benchmarks during:

- Desk Audits
- Performed when draw requests are made
- Monthly Performance and Direct Beneficiary Reports
- Tracks and evaluates program performance outcomes
- Onsite HUD compliance reviews
- Conducted annually and includes review of supporting documentation

In addition, working with the Continuum of Care and other Emergency Solutions Grant recipients in the state, Quarterly Project Performance Report have been created to review 7 components for performance.

Appendix

HOME Investment Partnership Program Policies and Procedure Manual



HOME Investment Partnership Program Policies and Procedures Manual

City of Wilmington, Department of Real Estate and Housing
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(302) 576-3000 Fax (302) 573-5588

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Introduction

The HOME Program was created by the National Affordable Housing Act of 1990 (NAHA) and is designed to strengthen public-private partnerships and to expand the supply of decent, safe, sanitary, and affordable housing.

HOME funds are used to achieve the following objectives:

- To provide decent affordable housing to lower-income households.
- To expand the capacity of non-profit housing providers.
- To strengthen the ability of state and local governments to provide housing.
- To leverage private sector participation.

Eligible activities are defined in accordance with the following categories:

- Housing rehabilitation,
- Homebuyer activities,
- Rental housing activities, and
- Tenant-based Rental Assistance (TBRA).

Who May Apply:

- Individual households, non-profit and for-profit developers may apply for HOME funding.

Distribution of Funding:

The City of Wilmington distributes HOME funds geographically within its boundaries and among different categories of housing as identified in its approved consolidated plan.

NOTE: At this time the City of Wilmington does not fund TBRA programs.

The City of Wilmington only invests HOME funds in eligible projects within its boundaries.

Definitions:

1. **Action Plan:** The one-year portion of the Consolidated Plan. It includes the PJ's annual application for HOME funds.
2. **Adjusted Income:** Adjusted income is annual (gross) income reduced by deductions for dependents, elderly households, medical expenses, handicap assistance expenses and childcare (these are the same adjustment factors used by the Section 8 Program). Adjusted income is used in HOME to compute the actual tenant payment in TBRA programs and the low HOME rent in rental projects in which rents are based on 30% of a family's adjusted gross income.
3. **Affordability:** The requirements of the HOME Program that relate to the cost of housing both at initial occupancy and over established timeframes, as prescribed in the HOME Final Rule. Affordability requirements vary depending upon the nature of the HOME assisted activity (i.e., homeownership or rental housing).

4. **Annual Income:** Annual income as defined in 24 CFR 5.609, referred to as "Part 5 annual income", also known as the rules for determining income under the Section 8 voucher program.
5. **Commitment:** Commitment means (1) The participating jurisdiction has executed a legally binding written agreement (that includes the date of the signature of each person signing the agreement) with a State recipient, a subrecipient, or a contractor to use a specific amount of HOME funds to produce affordable housing, provide down payment assistance, or provide tenant-based rental assistance; or has met the requirements to commit to a specific local project, as defined in paragraph (2) of this definition. (See § 92.504(c) for minimum requirements for a written agreement.) An agreement between the participating jurisdiction and a subrecipient that is controlled by the participating jurisdiction (e.g., an agency whose officials or employees are official or employees of the participating jurisdiction) does not constitute a commitment. An agreement between the representative unit and a member unit of general local government of a consortium does not constitute a commitment. In addition, and only until October 21, 2013, a properly executed written agreement reserving a specific amount of funds for a CHDO may constitute a commitment. As of October 22, 2013 the requirements for commitment to a specific local project will apply to all CHDO fund commitments.
6. **Commitment to a specific local project:** Commitment to a specific local project means that a legally binding agreement was executed meeting one of the following sets of requirements:
 - a. For rehabilitation or new construction projects, the PJ (or other entity) and the project owner will execute an agreement for an identifiable project for which all necessary financing has been secured, a budget and schedule have been established, and underwriting has been completed and under which construction is scheduled to start within 12 months of the agreement date. If the project is owned by the City of Wilmington or state recipient, the project must be set up in the disbursement and information system and construction reasonably expected to start within 12 months of the set-up date.
 - b. If the project consists of acquisition of standard housing by the PJ, the agreement must be a binding contract for the sale of an identifiable property and the property title must be transferred to the PJ (or other entity) within six months of the date of the contract.
 - c. If the project involves the acquisition of standard housing and the City of Wilmington is providing HOME funds to a purchaser, under the agreement, the title of the property must be transferred to the purchaser within six months of the agreement date.
 - d. If the project consists of TBRA, the City of Wilmington/Subrecipient must enter into a rental assistance contract with the owner or the tenant in accordance with the provisions of 24 CFR Part 92.209.

* Note that preliminary or conditional "commitments" may be made, but no funds are considered committed under the rules unless the above conditions have been met.
7. **Consolidated Plan:** A plan prepared in accordance with the requirements set forth in 24 CFR Part 91 which describes community needs, resources, priorities and proposed activities to be undertaken under certain HUD programs, including HOME.

8. **Community Housing Development Organization (CHDO):** A private, nonprofit organization that meets a series of qualifications prescribed in the HOME regulations at 24 CFR Part 92.2. The HOME New Rule requires that CHDO's have paid staff with demonstrated capacity appropriate to the CHDO's role (this requirement cannot be met through volunteer, donated staff, shared staff, or board members). A participating jurisdiction must award at least 15 percent of its annual HOME allocation to CHDOs.
9. **Draw-Down:** The process of requesting and receiving HOME funds. The City of Wilmington draw down funds from a line of credit established by HUD.
10. **Final Rule:** The Final HOME Rule was published at 24 CFR Part 92 on July 24, 2013 and became effective on August 24, 2013.
11. **Group Home:** Housing occupied by two or more single persons or families consisting of common space and/or facilities for group use by the occupants of the unit, and (except in the case of shared one-bedroom units) separate private space for each family.
12. **HOME-Assisted Units:** A term that refers to the units within a HOME project for which rent, occupancy and/or recapture restrictions apply. The number of units designated as HOME-assisted affects the maximum HOME subsidies that may be provided to a project.
13. **HOME Funds:** All appropriations for the HOME Program, plus all repayments and interest or other returns on the investment of these funds.
14. **HOME Investment Trust Fund:** The term given to the two accounts - one at the Federal level and one at the local level - that "hold" the CITY OF WILMINGTON's HOME funds. The Federal HOME Investment Trust Account is the U.S. Treasury account for each participating jurisdiction. The local HOME Investment Trust Fund account includes repayments of HOME funds, matching contributions and payment of interest or other returns on investment.
15. **Household:** One or more persons occupying a housing unit.
16. **Jurisdiction:** A state or unit of general local government.
17. **Low-Income Families:** Families whose annual incomes do not exceed 80 percent of the median income for the area (adjusted for family size).
18. **Match:** Match is the City of Wilmington's contribution to the HOME Program -- the local, non-Federal contribution to the partnership. The City of Wilmington's match contribution must equal not less than 25 percent of the HOME funds drawn down for projects in that fiscal year. The City of Wilmington has been granted a waiver from HUD reducing the match requirement from 25 percent to 12.5 percent. The City of Wilmington will check annually to confirm the waiver is still valid.
19. **New Construction:** The creation of new dwelling units. Any project which includes the creation of new or additional dwelling units in an existing structure is considered new construction.
20. **Participating Jurisdiction (PJ):** The term given to any state, local government or consortium that has been designated by HUD to administer a HOME Program. HUD designation as a PJ occurs if a state or local government meets the funding thresholds, notifies HUD that they intend to participate in the program and has a HUD-approved Consolidated Plan. Program Income: Gross income received by the CITY OF

WILMINGTON, state recipient, or a sub recipient directly generated from the use of HOME funds or matching contributions.

21. **Project:** A site or an entire building or two or more buildings, together with the site or sites on which the building or buildings is located, that are under common ownership, management and financing and are to be assisted with HOME funds, under a commitment by the owner, as a single undertaking. The HOME Final Rule eliminated the requirement that all buildings fall within a four-block radius.
22. **Project completion:** All necessary title transfer requirements and construction work have been performed; the project complies with all HOME requirements; the final draw-down of HOME funds has been disbursed for the project; and the project completion information has been entered in the disbursement and information system established by HUD, except that with respect to rental housing project completion, for the purposes of § 92.502(d) of this part, project completion occurs upon completion of construction and before occupancy. For TBRA, project completion means the final draw-down has been disbursed for the project.
23. **Reconstruction (also rehabilitation):** The rebuilding, on the same lot, of housing standing on a site at the time of project commitment. Except that housing that was destroyed may be rebuilt on the same lot if HOME funds are committed within 12 months of the date of destruction the number of housing units on the lot may not be changed as part of the reconstruction project, but the number of rooms per unit may change. Reconstruction also includes replacing an existing substandard unit of manufactured housing with a new or standard unit of manufactured housing.
24. **Single-Room Occupancy (SRO):** Housing consisting of single-room dwelling units that is the primary residence of its occupant or occupants. The unit must contain food preparation and/or sanitary facilities if the project involves new construction, conversion of non-residential space, or reconstruction. If the units do not contain sanitary facilities, the building must contain sanitary facilities shared by the tenants. SRO must be in compliance with the local zoning regulations.
25. **State Recipient:** State PJs can award their HOME funds to units of local government to run HOME locally. Any unit of local government designated by a state to receive HOME funds is called a “state recipient.” The state is responsible for ensuring that HOME funds allocated to state recipients are used in accordance with the HOME regulations and other applicable laws.
26. **Sub recipient:** A public agency or nonprofit organization selected by the City of Wilmington to administer all or a portion of the CITY OF WILMINGTON’s HOME Program. A public agency or nonprofit organization that receives HOME funds solely as a developer or owner of housing is not a sub recipient.
27. **Targeting:** Requirements of the HOME Program relating to the income or other characteristics of households that may occupy HOME-assisted units.
28. **Tenant-Based Rental Assistance (TBRA):** A form of direct rental assistance in which the recipient tenant may move from a dwelling unit with a right to continued assistance. Includes security and utility deposits associated with the rental of dwelling units.
29. **Very-Low-Income Families:** Families whose annual incomes do not exceed 50 percent of the median income for the area (adjusted for family size).

General Eligibility Requirements

Eligible Activities

HOME funds may be used to develop and support affordable rental housing and homeownership opportunities through:

- Acquisition (including assistance to homebuyers),
- New construction (includes adding additional units to an existing structure), Reconstruction, or rehabilitation of non-luxury housing with suitable amenities, including related costs such as:
 - Real property acquisition,
 - Site improvements,
 - Demolition, and
 - Other eligible expenses including financing costs, relocation expenses of any displaced persons, families, businesses, or organizations;
- Tenant-based rental assistance to eligible household(s), including security deposits;
- Operating expenses of community housing development organizations.

*All housing supported with HOME funds must be permanent or transitional housing. The specific eligible costs for these activities are set forth in 24 CFR 92.206 through 209. The activities and costs are eligible only if the housing meets the property standards as outlined at 24 CFR 92.251 upon project completion.

** A HOME assisted project that is terminated before completion, either voluntarily or otherwise, constitutes an ineligible activity and will be subject to repayment of funds.

Eligible Properties:

- 1-4 Single family unit homes
- Condominiums/Cooperatives
- Acquisition, rehabilitation, or new construction of affordable multi-family rental housing.
- Group Homes
- Transitional Housing & Single Room Occupancy Units
- Permanent Supportive Housing
- May be one or more buildings on a single site, but project must be assisted with HOME funds as a single undertaking.

Method of Assistance:

- City of Wilmington HOME funds are provided through loans or grants which are determined at the time the funds are awarded.
- **Minimum amount of assistance.** The minimum amount of HOME funds that may be invested in a project involving rental housing or homeownership is \$1,000 times the number of HOME-assisted units in the project.

- **Maximum HOME Investment:**

Maximum Per Unit Subsidy Amounts (Updated Annually)

May 24, 2017*

0 Bedroom	1 Bedroom	2 Bedrooms	3 Bedrooms	4 Bedrooms
120,655	136,963	165,554	207,797	234,806

*Actual funding levels will vary project by project and may be lower based on cost reasonableness, and needs of project. In addition, Maximum per Unit Subsidy Amounts caps are set annually by HUD.

- **Projects Containing both HOME and Non-Home Units:** HOME funds may be used to assist one or more housing units in a multi-unit project that contains other non-Home units. However, the following additional restrictions apply:
 - Only the actual HOME eligible development costs may be supported by the HOME program.
 - Actual Costs can be determined by the following:
 - If the assisted and non-assisted units are not comparable (non-HOME units may contain luxury materials, for example) the actual costs may be determined based on a method of cost allocation.
 - If the assisted and non-assisted units are comparable in terms of size, features and number of bedrooms, the actual cost of the HOME assisted units can be determined by pro-rating the total HOME eligible development costs of the project so that the proportion of the total development costs charged to the HOME program does not exceed the proportion of the HOME-assisted units in the project.

Eligible Project Costs

HOME funds may be used to pay the following eligible costs:

- Acquisition Costs
- Development Hard Costs
- Related Soft Costs
- Community Housing Development Organization Costs
- Relocation Costs

If a property supported (acquired, rehabilitated, etc) with HOME funds is ultimately unable to provide affordable housing in accordance with HUD regulations, the project will be deemed ineligible and subject to the recapture of HOME funds. These project costs are explained in further detail in the following pages.

Acquisition Costs:

- Includes costs of acquiring improved or unimproved real property
- Acquisition of vacant land or demolition can only be undertaken for particular housing project intended to provide affordable housing.
- Costs to make utility connections to an adjacent street or to make improvements to the project site, in accordance with the provisions of § 92.206(a)(3)(ii) and (iii) are also eligible in connection with acquisition of standard housing.

Development Hard Costs:

- Includes the actual cost of constructing or rehabilitating housing.
 - **New Construction:** Project costs must meet the City of Wilmington Construction Standards attached to this document.
 - **Rehabilitation:** Project costs must meet the City of Wilmington Construction Standards attached to this document. Demolition of Existing Structures (Remember that Uniform Relocation Act applies)
 - Creation of utility connections including off-site connections from the property line to the adjacent street.
 - Improvements to the project site (only property owned by the project owner, where the project is located) that is in keeping with improvements of surrounding, standard projects. Including:
 - On-site roads
 - Sewer Lines
 - Water lines
- *Costs must be necessary to the development of the project.

- Costs to construct or rehabilitate laundry and/or community facilities located in the same building as the housing for the use of project residents (only applicable to multi-unit RENTAL housing).

New Construction:

- **Manufactured Housing:** HOME funds may be used to purchase manufactured housing units or purchase the land upon which a manufactured housing unit is located. City of Wilmington Home funds shall not be used to rehabilitate manufactured housing units. Any manufactured housing unit purchased with HOME funds must, at the time of project completion, be connected to permanent utility hook-ups and be located on land that is owned by the manufactured housing unit owner or land for which the manufactured housing owner has a lease for a period at least equal to the applicable period of affordability.

Soft Costs:

- Costs include other reasonable and necessary costs incurred by the owner and associated with the financing, or development (or both) of new construction, rehabilitation or acquisition of housing assisted with HOME funds.
- These costs include, but are not limited to:
 - Architectural Services;
 - Engineering Services;
 - Preparation of plans, drawings, specifications, or work write-ups;
 - Costs to process and settle the financing for a project;
 - Private lender origination fees;
 - Credit reports;
 - Fees for title evidence;
 - Fees for recordation;
 - Filing of legal documents;
 - Building permits;
 - Attorney’s fees;
 - Private appraisal fees;
 - Fees for an independent cost estimate;
 - Builders or developers fees;
 - Costs of a project audit;
- Affirmative marketing and fair housing information to prospective homeowners and tenants;
- Staff and overhead costs directly related to carrying out the project, such as:
 - Work specifications preparation,
 - Loan processing inspections, and
 - Other services related to assisting potential owners, tenants, and homebuyers.

- Housing counseling (only for individuals who ultimately occupy a HOME unit)
- All costs must be reasonable and thoroughly documented (including timesheets detailing actual time worked on HOME activities).
- For both new construction and rehabilitation, costs for the payment of impact fees that are charged for all projects within a jurisdiction.
- Costs of environmental review and release of funds in accordance with 24 CFR Part 58 which are directly related to the project.
- Cost of funding an initial operating deficit reserve, not to exceed 18 months (ONLY eligible for new construction or rehabilitation projects):
 - Only can be used to pay project operating expenses, scheduled payments to a replacement reserve, and debt service.
 - Any HOME funds placed in an operating deficit reserve that remains unexpended after the period of project rent-up may be retained for project reserves.
- Relocation costs (for persons displaced by the project):
 - Replacement housing payments
 - Moving expenses
 - Other reasonable out-of-pocket costs incurred in the temporary relocation of persons.
 - Staff time associated with providing relocation to displaced persons (including referrals housing search assistance, property inspections, counseling, and other assistance necessary to minimize hardship).
- Payment of Construction Loan, Bridge Financing, or Guaranteed Loan (principle & interest), if:
 - The Project meets all HOME requirements and the loan was used for eligible costs specified in HOME Regulations and this policies and procedures manual; and
 - The HOME assistance is part of the original financing for the project.

Community Housing Development Organization (CHDO) Costs:

- A CHDO is defined as a private, nonprofit organization that meets a series of qualifications prescribed in the HOME regulations at 24 CFR Part 92.2.
 - i.e. Organized under the Internal Revenue Code of 1986 (IRC) at 501(c)(3) or 501(c)(4); a subordinate of a central organization under IRC 905; or a wholly-owned entity that is regarded as an entity separate from its owner for tax purposes (e.g., a single member limited liability company that is wholly-owned by an organization that qualifies as tax-exempt), when the owner organization has a tax exemption ruling from the IRS under section 501(c)(3) or 501(c)(4) of the IRC. The nonprofit must meet the other qualifying criteria outlined in the CHDO definition.
 - The CHDO is not controlled by, or significantly influenced by, a for-profit entity. In addition to the pre-2013 requirements that remain unchanged, paragraph 3(iv) adds a new criterion that if a for-profit entity creates or sponsors a potential CHDO, while the officers and employees of the for-profit entity can serve as Board members of a CHDO (subject to the one-third appointment limitation), they cannot serve as officers or employees of the CHDO.

- The HOME New Rule requires that CHDO's have paid staff with demonstrated capacity appropriate to the CHDO's role (this requirement cannot be met through volunteer, donated staff, shared staff, or board members).
- CHDO status must be recertified regularly by the City of Wilmington.
- In an owner or developer role, the CHDO must own the HOME-assisted housing or have a long term ground lease.
- Costs include operating Expense and Capacity Building Costs for eligible CHDO's.
- Operating expenses means reasonable and necessary costs for the operation of the community housing development organization, such costs include:
 - Salaries, wages, and other employee compensation and benefits;
 - Employee education,
 - Training, and travel;
 - Rent;
 - Utilities;
 - Communication costs;
 - Taxes; insurance;
 - Equipment; and
 - Materials and supplies.
- Costs DO NOT include operating expenses incurred by a CHDO acting as a subrecipient or contractor under the HOME Program.

Tenant Based Rental Assistance:

- Eligible costs include the rental assistance and security deposit payments made to provide tenant-based rental assistance for eligible households.
- Administration of tenant-based rental assistance is generally eligible only under Administrative Expenses (subject to administrative CAP). Specific exceptions will apply where costs for income certifications and unit inspections can be directly assigned to individual projects.

Ineligible Activities

HOME funds shall not be used to:

- Provide project reserve accounts, except as provided in § 92.206(d)(5), or operating subsidies;
- Provide tenant-based rental assistance for the special purposes of the existing section 8 program, in accordance with section 212(d) of the Act;
- Provide non-federal matching contributions required under any other Federal program;
- Provide assistance authorized under section 9 of the 1937 Act (Public Housing Capital and Operating Funds);
- Provide assistance to eligible low-income housing under 24 CFR part 248 (Prepayment of Low Income Housing Mortgages), except that assistance may be provided to priority purchasers as defined in 24 CFR 248.101;
- Provide assistance (other than tenant-based rental assistance or assistance to a homebuyer to acquire housing previously assisted with HOME funds) to a project previously assisted with HOME funds during the period of affordability established by the participating jurisdiction in the written agreement under §92.504. However, additional HOME funds may be committed to a project up to one year after project completion (see § 92.502), but the amount of HOME funds in the project may not exceed the maximum per-unit subsidy amount established under § 92.250.
- Pay for the acquisition of property owned by the City of Wilmington, except for property acquired by the participating jurisdiction with HOME funds, or property acquired in anticipation of carrying out a HOME project; or Pay delinquent taxes, fees or charges on properties to be assisted with HOME funds.
- Pay for any cost that is not eligible under §§ 92.206 through 92.209.
- Support activities in connection with litigation involving discrimination or fair housing are set forth in section 224 of the Act.

Eligible Beneficiaries/Residents

The HOME Program is designed to provide affordable housing to low-income households and individuals.

Eligible beneficiaries must meet the following requirements:

- Household must be at or below 80% of area median income (or applicable requirements for Rental Housing)
- Household must reside in or be relocating to the City of Wilmington;
- Household must not be an agent, consultant, officer, employee, and/or elected official of the City of Wilmington or a HOME recipient of funds (household may still be able to receive assistance IF a waiver is received by HUD); and
- Household must meet all other requirements where applicable.

Additional restrictions apply when HOME is used for rental housing or HOME assisted rental units and households assisted with HOME funded TBRA must have incomes that are 60% or less of area median income. Twenty percent of the units in each rental housing project with five or more HOME assisted units must be occupied by families with incomes at or below 50% of area median income.

Income Eligibility:

When determining the annual income of an individual or family, the HOME recipient must use the standard for calculating annual income under 24 CFR 5.609.

Long-Term Affordability:

To ensure investments provide affordable housing over the long term, rent and occupancy restrictions continue throughout the period of Affordability.

The minimum length of an affordability period depends on the amount of the HOME investment in the property and the nature of the activity:

HOME Investment per Unit Affordability Period

<u>HOME Investment per Unit</u>	<u>Minimum Period of Affordability</u>
Under \$15,000*	5 years
\$15,000 to \$40,000*	10 years
Over \$40,000*	15 years
New construction or acquisition of newly constructed housing (Rental)	20 years
Refinancing of rental housing (Rehab)	15 years

Throughout the period of affordability, income eligible households must occupy the assisted units. When designated rental units become vacant during the period of affordability, subsequent tenants must be income eligible and must be charged the applicable rent.

If a home purchased with HOME assistance is sold during the period of affordability, **recapture provisions**, outlined in the Homebuyer section below, apply to ensure the continued provision of affordable housing.

Site and Neighborhood Standards for Potential HOME Projects:

Housing provided through the **HOME** program must promote greater choice of housing opportunities. Specific rules are as follows:

(2) HOME-provided housing must be suitable from the standpoint of facilitating and furthering full compliance with Title VI of the Civil Rights Act - 1964, the Fair Housing Act, and Executive Order 11063.

1. **Title VI of the Civil Rights Act of 1964** , as amended (42 U.S.C. 2000d) - States that no person may be excluded from participation in, denied the benefits of, or subjected to discrimination under any program or activity receiving federal financial assistance on the basis of race, color, or national origin.
2. Title VIII of the Civil Rights Act of 1968, as amended “ **The Fair Housing Act** ” (42 U.S.C. 3601) - Prohibits discrimination in the sale or rental of units in the private housing market against any person on the basis of race, color, religion, sex, national origin, familial status or handicap.
3. Equal Opportunity in Housing (**Executive Order 11063**) - Prohibits discrimination in housing or residential property financing related to any federally assisted activity against individuals on the basis of race, color, religion, sex or national origin.
4. The site meets the HQS site standards at **24 CFR 982.401(i)** for existing housing projects.

Existing and Rehabilitated Projects must meet “**Site and Neighborhood Standards**” from 24 CFR **983.57.4(d)** which places limiting conditions on building in areas of “minority concentration” and that are “racially mixed.”

Sec. 983.57.4(d) - Site and neighborhood standards

(d) Existing and rehabilitated housing site and neighborhood standards. A site for existing or rehabilitated housing must meet the following site and neighborhood standards. The site must:

- (1) Be adequate in size, exposure, and contour to accommodate the number and type of units proposed, and adequate utilities and streets must be available to service the site. (The existence of a private disposal system and private sanitary water supply for the site, approved in accordance with law, may be considered adequate utilities.)
- (2) Promote greater choice of housing opportunities and avoid undue concentration of assisted persons in areas containing a high proportion of low-income persons.
- (3) Be accessible to social, recreational, educational, commercial, and health facilities and services and other municipal facilities and services that are at least equivalent to those typically found in neighborhoods consisting largely of unassisted, standard housing of similar market rents.

(4) Be so located that travel time and cost via public transportation or private automobile from the neighborhood to places of employment providing a range of jobs for lower-income workers is not excessive. While it is important that housing for the elderly not be totally isolated from employment opportunities, this requirement need not be adhered to rigidly for such projects.

New Construction Projects must meet “**Site and Neighborhood Standards**” from 24 CFR **983.57.4(e)** which places limiting conditions on building in areas of “minority concentration” and that are “racially mixed.”

Sec. 983.57.4(e) - Site and neighborhood standards

(e) New construction site and neighborhood standards. The proposed sites for new construction units must be approved by the City of Wilmington, ***Department of Real Estate and Housing*** as meeting the following site and neighborhood standards:

(1) The site must be adequate in size, exposure, and contour to accommodate the number and type of units proposed, and adequate utilities (water, sewer, gas, and electricity) and streets must be available to service the site.

(2) The site must not be located in an area of minority concentration, except as permitted under paragraph (e)(3) of this section, and must not be located in a racially mixed area if the project will cause a significant increase in the proportion of minority to non-minority residents in the area.

(3) A project may be located in an area of minority concentration only if:

(i) Sufficient, comparable opportunities exist for housing for minority families, in the income range to be served by the proposed project, outside areas of minority concentration (see paragraph (e)(3)(iii),(iv) and (v) of this section for further guidance on this criterion); or

(ii) The project is necessary to meet overriding housing needs that cannot be met in that housing market area (see paragraph(e)(3)(vi) of this section for further guidance on this criterion).

(iii) As used in paragraph (e)(3)(i) of this section “Sufficient” does not require that in every locality there be an equal number of assisted units within and outside of areas of minority concentration. Rather, application of this standard should produce a reasonable distribution of assisted units each year that, over a period of several years, will approach an appropriate balance of housing choices within and outside areas of minority concentration. An appropriate balance in any jurisdiction must be determined in light of local conditions affecting the range of housing choices available for low-income minority families and in relation to the racial mix of the locality's population.

(iv) Units may be considered “comparable opportunities” as used in paragraph (e)(3)(i) of this section, if they have the same household type (elderly, disabled, family, large family) and tenure type (owner/renter); require approximately the same tenant contribution towards rent; serve the same income group; are located in the same housing market; and are in standard condition.

(v) Application of this sufficient, comparable opportunities standard involves assessing the overall impact of HUD-assisted housing on the availability of housing choices for low-income minority families in and outside areas of minority concentration, and must take into account the extent to which the following factors are present, along with other factors relevant to housing choice

(A) A significant number of assisted housing units are available outside areas of minority concentration.

(B) There is significant integration of assisted housing projects constructed or rehabilitated in the past 10 years, relative to the racial mix of the eligible population.

(C) There are racially integrated neighborhoods in the locality.

(D) Programs are operated by the locality to assist minority families that wish to find housing outside areas of minority concentration.

(E) Minority families have benefited from local activities (e.g., acquisition and write-down of sites, tax relief programs for homeowners, acquisitions of units for use as assisted housing units) undertaken to expand choice for minority families outside of areas of minority concentration.

(F) A significant proportion of minority households have been successful in finding units in non-minority areas under the Section 8 certificate and voucher programs.

(G) Comparable housing opportunities have been made available outside areas of minority concentration through other programs.

(vi) Application of the “overriding housing needs” criterion, for example, permits approval of sites that are an integral part of an overall local strategy for the preservation or restoration of the immediate neighborhood and of sites in a neighborhood experiencing significant private investment that is demonstrably changing the economic character of the area (a “revitalizing area”). An “overriding housing need,” however, may not serve as the basis for determining that a site is acceptable if the only reason the need cannot otherwise be feasibly met is that discrimination on the basis of race, color, religion, sex, national origin, age, familial status or disability renders sites outside areas of minority concentration unavailable or if the use of this standard in recent years has had the effect of circumventing the obligation to provide housing choice.

(4) The site must promote greater choice of housing opportunities and avoid undue concentration of assisted persons in areas containing a high proportion of low-income persons.

(5) The neighborhood must not be one which is seriously detrimental to family life or in which substandard dwellings or other undesirable conditions predominate, unless there is actively in progress a concerted program to remedy the undesirable conditions.

(6) The housing must be accessible to social, recreational, educational, commercial, and health facilities and services, and other municipal facilities and services that are at least equivalent to those typically found in neighborhoods consisting largely of unassisted, standard housing of similar market rents.

(7) Except for new construction housing designed for elderly persons, travel time and cost via public transportation or private automobile, from the neighborhood to places of employment providing a range of jobs for lower-income workers, must not be excessive.

Program Policies & Requirements by Activity Type

Rental Housing Development:

Before committing funds to a rental project, the City will evaluate the project and verify that the developer did not request or was not allocated any more HOME funds in combination with other governmental assistance than is necessary to provide the affordable housing.

*See **HOME Subsidy Layering and Underwriting Policy**

Eligible Beneficiaries:

Eligible tenants must meet the following requirements:

FOR PROJECTS WITH LESS THAN 5 HOME UNITS:

- Household must be at or below 80% of area median income;

2017 Adjusted HOME Income Limits (Updated Annually)

AMI	1 PERSON	2 PERSON	3 PERSON	4 PERSON	5 PERSON	6 PERSON	7 PERSON	8 PERSON
80 %	46,600	53,250	59,900	66,550	71,900	77,200	82,550	87,850

- Household must reside in or be relocating to the City of Wilmington;
- Household must not be an agent, consultant, officer, employee, and/or elected official of the City of Wilmington or a HOME recipient of funds (household may still be able to receive assistance IF a waiver is approved by the City of Wilmington or HUD); and
- Household must meet all other requirements where applicable.

FOR PROJECTS WITH MORE THAN 4 HOME UNITS:

- Household must be at or below the corresponding income limit based on the number of units in the HOME development, see below:

2017 Adjusted HOME Income Limits (Updated Annually)

Applicability	AMI	1 PERSON	2 PERSON	3 PERSON	4 PERSON	5 PERSON	6 PERSON	7 PERSON	8 PERSON
20% of Home Units	50%	29,150	33,330	37,450	41,600	44,950	48,300	51,600	54,950
80% of HOME Units	80%	46,600	53,250	59,900	66,550	71,900	77,200	82,550	87,850

- Household must reside in or be relocating to the City of Wilmington;
- Household must not be an agent, consultant, officer, employee, and/or elected official of the City of Wilmington or a HOME recipient of funds (household may still be able to receive assistance IF a waiver is approved by the City of Wilmington or HUD); and
- Household must meet all other requirements where applicable.

Deadlines for Completion and Rent-Up

Within **4 years of contract execution** rental projects must be complete, meaning 100% of HOME funds has been disbursed for the project; and the project completion information has been entered in the disbursement and information system established by HUD (completion may occur after construction is completed, but before occupancy as long as beneficiary data is provided when the units are occupied).

The HOME-assisted units in a rental housing project must be occupied by households that are eligible as low-income families and must meet the requirements of this section to qualify as affordable housing. If eligible tenants do not occupy the housing within six months following the date of project completion, the Developer must submit marketing information and, if appropriate, a marketing plan.

HOME funds invested in any housing unit that has not been rented to eligible tenants **18 months after the date of project completion** shall be repaid to the City of Wilmington and/or HUD. The affordability requirements also apply to the HOME-assisted nonowner-occupied units in single-family housing purchased with HOME funds in accordance with § 92.254. The tenant must have a written lease that complies with § 92.253.

Eligible Activities:

Activities allowed with the use of City funds are activities that support the development of affordable rental housing and address the needs identified in the Consolidated Plan. The activities may include but are not limited to:

- Acquisition of existing structure(s) for rehabilitation of affordable rental housing
- Rehabilitation of existing structure(s) of affordable rental housing
- New construction of affordable rental housing

Eligible Types of Projects:

- 1-4 Single family unit homes
- Group Homes
- Acquisition, rehabilitation, or new construction of affordable multi-family rental housing.
- Transitional Housing & Single Room Occupancy Units
- Permanent Supportive Housing

May be one or more buildings on a single site, but project must be assisted with HOME funds as a single undertaking

Eligible Costs:

- Development hard cost for both new construction and rehabilitation
- Acquisition costs
- General management
- Related soft costs

- Architectural, engineering or related professional services required:
- Cost to provide information services such as affirmative marketing and fair housing information to prospective tenants as required by HUD
- Operating cost directly related to carrying out the project, such as work specifications preparation, and loan processing inspections
- Cost of environmental review and release of funds in accordance with **24CFR part 58** directly related to the project

Prohibited Activities:

- Funds may NOT be used to pay for any cost that is not eligible costs under the HOME program (including 92.206 and 209), like delinquent taxes, fees or charges on properties to be assisted.
- Development of student housing and dormitories (including farm worker dormitories) is an ineligible activity.

Program Rules/Regulations:

Property Management Policies:

- The developer must use fair marketing practices when leasing HOME units. The city will review and approve the developer’s marketing policy as part of the application review and it will incorporate the policy as part of the funding agreement.
- Developers/owners must distribute to residents:
 - All applicable HUD or Environmental Protection Agency (EPA) approved pamphlets
 - “Renovate Right” Brochure (prior to any repairs that may disturb lead based paint in home built prior to 1978).
<https://www.epa.gov/sites/production/files/documents/renovaterightbrochure.pdf>.
 - “Protect Your Family from Lead in Your Home”
 - “Disclosure of Information on Lead-Based Paint and/or Lead-Based Paint Hazards” signed by renters prior to their becoming obligated under a rental contract
 - The City of Wilmington requires that developers/owners obtain evidence of tenant receipt of any pamphlet distributed. Owners may create their own receipt of disclosure.
- All HOME projects shall be in compliance with Fair Housing Act and Section 504 of the Rehabilitation Act of 1973.
- The owner cannot refuse to lease HOME-assisted units to persons with a voucher for Section 8 Tenant-Based Assistance.
- The Developer must submit to the City of Wilmington for rents each year for HOME assisted units (during the period of affordability) for review and approval. Undue rent increases from year to year are prohibited.
- To ensure compliance with the affordability period, owners must establish systems to re-certify tenant income on an annual basis. Recertification documents will be monitored by the city.

- Tenants who no longer qualify as low-income families must pay as rent the lesser of the amount payable by the tenant under State or local law or 30 percent of the family’s adjusted income, except that tenants of HOME-assisted units that have been allocated low-income housing tax credits by a housing credit agency pursuant to section 42 of the Internal Revenue Code of 1986 (26 U.S.C. 42) must pay rent governed by section 42. In addition, in projects in which the HOME units are designated as floating pursuant to paragraph (j), tenants who no longer qualify as low-income are not required to pay as rent an amount that exceeds the market rent for comparable, unassisted units in the neighborhood.
- Any increase in rents for HOME-assisted units is subject to the provisions of outstanding leases, and in any event, the owner must provide tenants of those units not less than 30 days prior written notice before implementing any increase in rents.
- The lease between the tenant and the owner must be at least one year (12 months). Termination of the lease requires a 30 day notice of refusal to renew or termination of tenancy.
 - The lease must comply with all the conditions listed in the **Lease Requirements** section of this document
- Every unit assisted with HOME funds in subject to annually updated rent limits.
 - If the assisted unit has multiple subsidies, e.g. HOME and LIHTC the more restrictive guidelines must be met for the rent and income limits.
 - The tenant can at no time be charged more than HOME rent limits even in conjunction with another program.
 - The maximum HOME rent limits are recalculated on a periodic basis after HUD determines fair market rents and median incomes. Regardless of changes in fair market rents and in median income over time, the HOME rents for a project are not required to be lower than the HOME rent limits for the project in effect at the time of project commitment.
 - If a project has five or more HOME assisted units, the HOME regulation says that at least 20% of the HOME assisted rental units must be occupied by household at 50% of median income or below, and they must occupy units at or below the Low HOME Rent. (See chart below for rent limits)

2017 HOME Program Monthly Rent Limit (Updated Annually)

Applicability	TYPE	SRO	1 BR	2 BR	3 BR	4 BR	5 BR	6 BR
20% of Home Units	Low HOME Rent	728	780	936	1,081	1,207	1,331	1,456
80% of HOME Units	High HOME Rent	845	1,003	1,211	1,515	1,686	1,866	2,024

- The Developer/Property Manager must submit to the City of Wilmington for rents each year for HOME assisted units (during the period of affordability) for review and approval. Undue rent increases from year to year are prohibited.
- The rent limit includes both rent and a utility allowance. To calculate the monthly utility allowance. Add the together the applicable allowances by unit size (number of bedrooms) and the utilities offered onsite.
- The City of Wilmington acceptable methods to calculate Utility allowance is **HUD Utility Schedule Model**:
 - The HUSM enables users to calculate utility schedules by housing type after entering utility rate information (tariffs). This model is based on climate and survey information from the U. S. Energy Information Administration of the Department of Energy and it incorporates energy efficiency and Energy Star data. This model is allowed for LIHTC projects per IRS regulations at 26 CFR 1.42-10(b)(4)(D).
 - The HUSM and use instructions can be accessed on HUD User at <https://www.huduser.gov/portal/resources/utilallowance.html>. The HUSM is available as either a spreadsheet model in MS EXCEL or a web-based model on HUD User at <https://www.huduser.gov/portal/datasets/husm/uam.html>. Web-based training on the use of the HUSM and post the recording on the HUD Resource Exchange as an additional resource for PJs.

Fiscal Policies:

- The owner must submit annual performance reports to the City of Wilmington for review (in a similar format to the pro-forma). If problems are identified, the City of Wilmington may offer technical assistance and/or request additional documentation and corrective actions.
- For rental projects with 10 or more units, financial statements prepared by an independent CPA (in the form of either a formal annual audit or CPA-compiled review) must be annually submitted to the City of Wilmington for review.
- All cost must be in direct relation to the city’s HOME assisted unit and supporting documentation of all expenditures is required for all costs being paid for with HOME funding.
- With the exception of acquisition and financing costs, HOME funds are available as reimbursement for eligible expenses.
- Related soft costs must be necessary for the development of the city HOME units, and documentation must be provided for any cost re-imbusement.
- Funding will be limited to the amount necessary to facilitate completion of the project and will not exceed a proportionate share of costs in a project with floating units.
- Before monies are released, an agreement will be signed between the City and the recipient. The agreement will satisfy Federal requirements and establishes the terms under which the funding is being provided. Funds will not be released until a funding agreement is executed and all applicable regulations have been met (i.e. environmental).

- The City will determine the number of HOME units based on the funding award. The city will work with the developer to determine if the assisted units are “fixed” or “floating”.
 - A “fixed” unit is when the owner applies funding requirements to specific units throughout the affordability period.
 - A “floating” unit is when the units designated as HOME assisted may change over the term of affordability, as long as the number of HOME assisted unit in the project remains constant.
 - Whatever decision is made, there always has to be the required amount of designated HOME units in the projects.

Term of Affordability:

- The city will provide gap financing in the form of a deferred loan or grant to affordable housing projects. Funding agreements will define the term of affordability according to the Federal regulations (see chart below).

<u>HOME Investment per Unit</u>	<u>Minimum Period of Affordability</u>
Under \$15,000*	5 years
\$15,000 to \$40,000*	10 years
Over \$40,000*	15 years
New construction or acquisition of newly constructed housing (Rental)	20 years
Refinancing of rental housing (Rehab)	15 years

- The affordability requirements apply without regard to the term of any loan or mortgage or the transfer of ownership.

Property Standards:

Housing that is constructed or rehabilitated with HOME funds must meet all applicable local codes, rehabilitation standards, ordinances, and zoning ordinances at the time of project completion, except as provided below.

- The City has written standards for rehabilitation that ensure that HOME-assisted housing is decent, safe, and sanitary. (see attached document)
- The City of Wilmington has adopted the following Residential code.
 - Sec. 4-32. - Residential code adopted. The document entitled "The Residential Building Code of 2012" copies of which have been and are now on file in the city clerk's office and in the department of licenses and inspections and in the fire department, and which is incorporated in this subchapter by reference, and all of the nationally recognized standards referred to and incorporated into that code, together with any and all supplements thereto, but except as such articles and sections are deleted, modified, or amended and as otherwise set forth in this subchapter and this chapter, are adopted as the residential building code of the city. (Ord. No. 13-034(sub 2), § 3, 2-20-14)

- Newly constructed housing must meet the current edition of the International Building Code (IBC) is a model building code developed by the International Code Council (ICC).
- All other HOME-assisted housing (e.g., acquisition) must meet all applicable State and local housing quality standards and code requirements.
- The housing must meet the accessibility requirements at 24 CFR part 8, which implements Section 504 of the Rehabilitation Act of 1973 (29 U.S.C. 794) and covered multifamily dwellings, as defined at 24 CFR 100.201, must also meet the design and construction requirements at 24 CFR 100.205, which implement the Fair Housing Act (42 U.S.C. 3601-3619).
- Construction of all manufactured housing must meet the Manufactured Home Construction and Safety Standards established in 24 CFR part 3280. These standards pre-empt State and local codes covering the same aspects of performance for such housing. Participating jurisdictions providing HOME assistance to install manufactured housing units must comply with applicable State and local laws or codes. In the absence of such laws or codes, the participating jurisdiction must comply with the manufacturer's written instructions for installation of manufactured housing units. Manufactured housing that is rehabilitated using HOME funds must meet the requirements set out in paragraph (a)(1) of this section.

The following requirements apply to housing for homeownership that is to be rehabilitated after transfer of the ownership interest:

- Before the transfer of the homeownership interest, the City will:
 - Inspect the housing for any defects that pose a danger to health; and
 - Notify the prospective purchaser of the work needed to cure the defects and the time by which defects must be cured and applicable property standards met.
 - The housing must be free from all noted health and safety defects before occupancy and not later than 6 months after the transfer.
- The housing must meet the property standards listed above not later than 1 year after transfer of the ownership interest.
- An owner of rental housing assisted with HOME funds must maintain the housing in compliance with all applicable State and local housing quality standards and code requirements
- All housing occupied by tenants receiving HOME tenant-based rental assistance must meet the housing quality standards in 24 CFR 982.401.
- All properties constructed or rehabilitated with City HOME funds will meet the minimum local codes and standards once construction is completed and occupied.
- All projects will be designed and constructed in compliance with the City of Wilmington Construction Standards (attached to this document).
- Monitoring visits will be conducted by the city to ensure property and construction standards are being met before, during, and after construction.

- In addition to the annual inspections performed by the owner, the City of Wilmington will perform inspections based on state and local codes within 12 months of project completion and
 - Every 3 years for 1-4 units (until the affordability period ends).
 - Every 2 years for 5-25 units (until the affordability period ends).
 - Annually for 26 + units (until the affordability period ends).

- Inspections are performed as described below:
 - 1-4 HOME Assisted Units 100% of HOME Units must be inspected.
 - 5+ HOME Assisted Units 51% of HOME Units or 4 Units (whichever is greater).
 - The City of Wilmington may also approve a different statistically valid sample size upon written request.

- Accessibility. The housing must meet the accessibility requirements of 24 CFR part 8, which implements Section 504 of the Rehabilitation Act of 1973 (29 U.S.C. 794), and Titles II and III of the Americans with Disabilities Act (42 U.S.C. 12131-12189) implemented at 28 CFR parts 35 and 36, as applicable. Covered multifamily dwellings, as defined at 24 CFR 100.201, must also meet the design and construction requirements at 24 CFR 100.205, which implements the Fair Housing Act (42 U.S.C. 3601–3619).

- All new construction housing developments with 5 or more units must design and construct 5 percent of the dwelling units, or at least one unit, whichever is greater, to be accessible for persons with mobility disabilities. These units must be constructed in accordance with the Uniform Federal Accessibility Standards (UFAS) or a standard that is equivalent or stricter.

- All renovations of existing structures with 15 or more units (where the cost of the alterations is 75 percent or more of the replacement cost of the completed facility) must have 5 percent of the dwelling units to be accessible for persons with mobility disabilities. These units must be constructed in accordance with the Uniform Federal Accessibility Standards (UFAS) or a standard that is equivalent or stricter.

- Regardless of project size, all multifamily housing projects shall, to the maximum extent feasible, be made to be readily accessible to and usable by individuals with handicaps.

- In projects with less than 15 units, HOME recipients are not required to take any action would result in a fundamental alteration in the nature of its program or activity or in undue financial and administrative burdens.

- Construction progress inspections. The City shall conduct progress and final inspections of construction to ensure that work is done in accordance with the applicable codes, the construction contract, and construction documents.

Homeownership Housing Development:

The City of Wilmington’s Department of Real Estate and Housing (REH) will provide loans and/or grant to developers of affordable homeownership projects to assist with cost that are in excess of construction, permanent, and/or other subsidy financing and equity resources. The amount of funds invested in a homeownership housing project will always reflect the minimum amount of public subsidy necessary to achieve the maximum public benefit.

Before committing funds to a housing project, the City will evaluate the project and verify that the developer did not request or was not allocated any more HOME funds in combination with other governmental assistance than is necessary to provide the affordable housing.

Eligible Beneficiaries:

Eligible homebuyers must meet the following requirements:

- Household must be at or below 80% of area median income (At time of purchase):

2017 Adjusted HOME Income Limits (Updated Annually)

AMI	1 PERSON	2 PERSON	3 PERSON	4 PERSON	5 PERSON	6 PERSON	7 PERSON	8 PERSON
80 %	46,600	53,250	59,900	66,550	71,900	77,200	82,550	87,850

- Household must reside in or be relocating to the City of Wilmington;
- Household must not be an agent, consultant, officer, employee, and/or elected official of the City of Wilmington or a HOME recipient of funds (household may still be able to receive assistance IF a waiver is approved by the City of Wilmington or HUD);
- Household will ultimately use the dwelling unit as their principal residence;
- Household will ultimately legally own the dwelling unit/property; and
- Household must meet all other requirements where applicable.

Eligible Activities:

Activities allowed with the use of City funds are activities that support the development of affordable housing and address the needs identified in the Consolidated Plan. The activities may include but are not limited to:

- Acquisition of existing structure(s) for rehabilitation of affordable homeownership housing
- Rehabilitation of existing structure(s) of affordable homeownership housing
- New construction of affordable homeownership housing

Eligible Types of Projects:

- 1-4 Single family unit homes
- Condominiums/Cooperatives
- May be one or more buildings on a single site, but project must be assisted with HOME funds as a single undertaking.

Eligible Costs:

- Development hard cost for both new construction and rehabilitation

- Acquisition costs
- General management
- Related soft costs
 - Architectural, engineering or related professional services required:
 - Cost to provide information services such as affirmative marketing and fair housing information to prospective tenants as required by HUD
 - Operating cost directly related to carrying out the project, such as work specifications preparation, and loan processing inspections
 - Cost of environmental review and release of funds in accordance with 24 CFR part 58 directly related to the project

Prohibited Activities:

- Funds may NOT be used to pay for any cost that is not eligible under the HOME program at 92.206 and 209, including delinquent taxes, fees or charges on properties to be assisted.
- Development of homeownership units where there is not a considerable market study illustrating demand for homeownership housing will not be supported with HOME funds.

Deadlines and conversion of units to rental

All projects must be **fully complete** with units sold within **4 years of the commitment** of HOME funds. In addition, any unit not sold within **6 months** (9 months for projects funded under City action plans 2014 and later) of the completion of construction **must be converted to rental and meet all of the requirements for HOME rental housing**. HOME funds provided for any such unit that is not rented within 18 months of conversion must be repaid to the City.

Program Rules/Regulations:

Property Management Policies:

- The developer must use fair housing marketing practices when selling HOME units, as required by the Fair Housing Act (4.2 U.S.C. 3601-29). The city will review and approve the developer's marketing policy as part of the application review and it will incorporate the policy as part of the funding agreement.
- 100 percent of HOME funds must be invested in dwelling units that are occupied by households that qualify as low-income families (80% AMI and below).
- If HOME funds are used to help a purchase/acquire one or more rental units along with the homeownership unit, the HOME rental affordability requirements apply to the rental units.
- All HOME projects shall be in compliance with Fair Housing Act and Section 504 of the Rehabilitation Act of 1973.
- The ownership interest may be subject only to the following:
 - Mortgages, deeds of trust or other debt instruments approved by the City of Wilmington; or

- Any other encumbrances or restrictions that do not impair the marketability of the ownership interest, other than the HOME Program restrictions on recapture.

Fiscal Policies:

- All cost must be in direct relation to the city’s HOME assisted unit and supporting documentation of all expenditures is required for all costs being paid for with HOME funding.
- With the exception of acquisition and financing costs, HOME funds are available as reimbursement for eligible expenses.
- Related soft costs must be necessary for the development of the city HOME units, and documentation must be provided for any cost re-imbusement.
- Funding will be limited to the amount necessary to facilitate completion of the project and will not exceed a proportionate share of costs in a project with multiple units. All projects will be underwritten according to the City of Wilmington HOME underwriting guidelines. See **HOME Subsidy Layering**.
- Individual homebuyers must also be underwritten per the guidelines.
- Before monies are released, an agreement will be signed between the City and the recipient. The agreement will satisfy Federal requirements and establishes the terms under which the funding is being provided. Funds will not be released until a funding agreement is executed and all applicable regulations have been met (e.g. environmental review requirements).

Term of Affordability:

- Investment of HOME funds into a homebuyer project requires an affordability period be attached to that home. The affordability period represents the minimum length of time a homeowner must reside in the property as his/her primary residence. The affordability period begins after project completion. The periods are based on the amount of HOME funds provided for the property.
- When the homebuyer sells or fails to reside in the property as his/her primary residence during the affordability periods, repayment of a portion of the HOME subsidy is required.

<u>Amount of HOME Assistance Per Unit</u>	<u>Minimum Period of Affordability in Years</u>
Under \$15,000	5 years
\$15,000 to \$40,000	10 years
Over \$40,000	15 years

HOME Subsidy Layering and Underwriting Policy

Before committing funds to a project, The City must evaluate the proposal to determine that there will be a reasonable level of profit or return on owner's or developer's investment in a project and that no more HOME funds is invested, alone or in combination with other governmental assistance, than is necessary to provide quality affordable housing that is financially viable for the entire affordability period. This evaluation will include:

- An examination of the sources and uses of funds for the project and a determination that the costs are reasonable; and
- An assessment, at minimum, of the current market demand in the neighborhood in which the project will be located, the experience of the developer, the financial capacity of the developer, and firm written financial commitments for the project.
- For projects involving rehabilitation of owner-occupied housing units a market analysis or evaluation of developer capacity is not required.
- For projects involving HOME-funded down payment assistance and which do not include HOME-funded development activity, a market analysis or evaluation of developer capacity is not required.

The City may rely upon the guidelines developed and/or evaluations conducted by other agencies, such as when Low Income Housing Tax Credits (LIHTC) or other HUD program funding, are used.

Applicants seeking HOME funds are required to submit to the City's Department of Real Estate and Housing during the annual Request for Proposal process.

- Commitment letters with all terms and conditions for the following:
 - Mortgages
 - Grants and/or other governmental assistance
 - Subordination agreements
 - Bridge (interim) loans
 - Investment tax credits (historic, low-income, if applicable)
 - Copy of partnership agreement (if the applicant is a partnership), which indicates the cash contributions by the general partners and/or limited partners

*Note: The proceeds from the sale of tax credits must be identified as a source of funding.

Documentation to verify the sources includes:

- Earnest money agreement, option or closing statement for land and/or buildings
- Construction cost estimate
- Construction contract or preliminary bids

- Agreements governing the various reserves which are capitalized at closing (to verify that the reserves cannot be withdrawn later as fees or distributions)
- Appraisal (to substantiate the value of land and property after rehabilitation/construction)

If the documentation is not adequate and does not support the costs as stated, the City will request additional documentation or a second opinion and/or reference from an appropriate source, such as another construction cost estimator, architect, or lawyer. When required documentation cannot be obtained, the City may deny HOME funding for the project.

- The city will provide gap financing in the form of a deferred loan or grant to affordable housing projects. Funding agreements will define the term of affordability according to the Federal regulations (see chart below).
- Affordability requirements shall be recorded on the property through:
 - A deed restriction or covenant running with the land; and
 - Loan documents.
- *Loan default and subsequent foreclosure negates the principal residence limitation, but not the affordability restrictions.
- All homeowners must be provided homebuyer counseling prior to purchase.
- All units must be sold at or below the HOME Unit Sale Limits (95% of the median purchase price for the area for the specified housing type). See chart below:

2017 HOME Unit Sale Limits (Updated Annually)

Homeownership Value Limit – 2017				
	1 – Unit	2 – Unit	3 – Unit	4 – Unit
REHAB	\$209,00	\$268,000	\$324,000	\$401,000
NEW	\$224,000	\$286,000	\$347,000	\$430,000

- Unit prices may vary (underneath this limit) based on neighborhood trends, target buyers, and project underwriting.
- The sale of a property and any assistance to a homebuyer require that the buyer be underwritten according to the City’s HOME project underwriting guidelines for homebuyers. This underwriting will include standards for the first mortgage and establish the terms for any subordination of the HOME loan.
- Resale of the property during the affordability period and qualification of subsequent buyers will be governed by the HOME covenant and land use restriction on the property.

Change in Ownership:

- If a home purchased with HOME assistance is sold during the period of affordability, **resale provisions**, outlined below, apply to ensure the continued provision of affordable housing.

Applicability & Exceptions

- This policy is applicable to all homebuyer units supported by the City's HOME/NSP program. This includes situations where HOME/NSP funds are being used to provide direct buyer assistance (e.g. down payment and closing costs) supporting a buyer's purchase of a home for sale by a private seller. It also applies to the sale of any home built or rehabilitated by a participant in the City's HOME or NSP programs (including subrecipients, developers, or CHDOs) whether or not the ultimate sale to the buyer includes direct assistance.
- While there may be individual cases where these requirements may be waived, program participants should request specific exceptions in writing prior to making any commitments to prospective buyers who cannot qualify within these criteria. The City's HOME/NSP partners are reminded that they will be responsible for representations and/or commitments made to prospective buyers without prior approval by the City.

Recapture/Resale

- The City of Wilmington has elected to use Recapture as its method of determining how affordability will be maintained for both its HOME and NSP programs. If no direct Homebuyer Assistance is provided then Resale must be used.

Maximum Homebuyer Assistance

- The maximum HOME/NSP-assistance available for a buyer is less than \$40,000. Not all buyers will qualify for the maximum assistance. The assistance available to any given buyer is based on the City's assessment of the buyer's need, taking into account the additional criteria outlined below.

Buyer Expectations

- To ensure that buyers are likely to sustain homeownership, assisted buyers must:
 - Be purchasing the home for a reasonable price that does not exceed the fair market value as determined by an independent appraisal. In most cases, the City will coordinate with the buyer's senior lender to obtain a copy of the lender's appraisal. Additionally, the home must have a sales price less than or equal to the applicable HOME Homeownership Value limit for the type (new or existing) and location of the home. These limits are updated annually by HUD and can be obtained from the City.
 - Have incomes between 30% and 80% (120% for the NSP Program, 50% if located in a targeted area) of the Area Median Income (AMI) as adjusted for household size. HOME limits assistance to households with incomes at or below 80% AMI and NSP limits assistance to households within 120% of AMI (or 50% if located in a targeted area). While the City is concerned about the housing needs of lower income households, it also recognizes that homeownership requires buyers to have sufficient discretionary income to maintain their homes over time, absorb increases in taxes and

insurance, and otherwise address unexpected expenses. As a result, the City focuses its homebuyer assistance to buyers with incomes in excess of 30% AMI.

- Buyers are required to contribute at least \$500 toward downpayment and closing costs. Additionally, buyers should have sufficient cash resources (including savings, checking, money market, or other similar non-retirement accounts) so that at closing buyers retain a savings of at least one (1) times their total monthly payment, including principal, interest, taxes, insurance, and any homeowner or condominium association fees.
- Buyers with liquid assets in excess of \$25,000 will be required to invest any of those liquid assets above \$25,000 toward the purchase of the home before receiving any NSP/HOME-assistance. For purposes of this requirement, liquid assets mean those readily convertible to cash (including but not limited to savings or checking accounts, certificates of deposit, stocks, and bonds). Liquid assets, however, exclude life insurance policies and any savings held in a tax-deferred retirement account (including but not limited to a pension, 401(k), and IRA) or health savings account recognized by the Internal Revenue Service.
- Buyers must obtain a loan whose monthly payment (i.e. front end ratio) does not exceed 30% of monthly income and that does not result in a total debt burden (i.e. back-end ratio) in excess of 45%. While the recent foreclosure crisis has reduced the availability of lending products that allow buyers to take on excessive monthly payments, some such products are still available. Even when assisted buyers are willing to take on larger monthly payments, the City has determined that buyers with excessive payments are less likely to sustain homeownership.
- Buyers must be qualified by their lender to spend at least 20% of their monthly gross income on their housing. Lenders often qualify borrowers to spend between 28-33% of monthly gross income; however, buyers qualifying only at payment levels below 20% of income usually have high consumer debt which increases both subsidy costs and the likelihood of foreclosure later.

Note: This criterion is not intended to eliminate buyers whose loan is limited by the lender's loan-to-value ratio resulting in a monthly payment less than 20% of income. For example, if a buyer could qualify to purchase a \$100,000 home at a 28% ratio, but because the household that buyer is purchasing is a \$50,000 home, the actual payment will be less than 20% of monthly income.)

- Buyer must complete Pre-Purchase Homeownership counseling as required below.
- Buyer must obtain a mortgage or senior loan that meets the requirements outlined below.

Pre-Purchase Counseling Requirement

To ensure that buyers receive are informed consumers, the City requires:

- Attendance within the past year at a City-approved pre-purchase homeownership counseling course by all adult household members who will hold title and be party to the senior loan; and
- That such counseling consists of at least 8 hours of instruction by a HUD-certified counselor, of which a minimum of two hours will be required person-to-person counseling.

- The counseling course must be approved by the City as evidence by a statement from the counseling agency that their curriculum meets the minimum requirements as established by the National Industry Standards for Homeownership Education and Counseling found at: <http://www.homeownershipstandards.com/Home/Home.aspx>.

Primary Loan Expectations

- To ensure that buyers receive high quality loans that are sustainable over time, the City requires that any buyer receiving HOME/NSP assistance towards closing costs, down payment, or a portion of the purchase price receive a senior loan (i.e first mortgage) meeting the following criteria:
 - The loan must be a “Qualified Mortgage” under the requirements of the Consumer Protection Financial Bureau (CFPB) outlined at 12 CFR 1026.43(e). Qualified Mortgages, among other features, limit total points and lender fees to reasonable levels. Qualified Mortgages also strictly limit pre-payment penalties and contain many other features intended to protect consumers.
 - Interest rates must be competitive and must NOT be a “Higher Priced” loan as defined by CFPB. Higher priced loan are those that exceed the Average Prime Offer Rate by more than 1.5% as of the date of the loan’s rate lock. Loans can be checked against the Average Prime Offer Rate by visiting the following website: <http://www.ffiec.gov/ratespread/newcalc.aspx>
 - Lending products should be fully amortizing 30-year fixed rate loans. While some buyers may prefer shorter (e.g. 15 year) loans, the City will only consider such loans on an exception basis if it determines that the buyer’s payment is sustainable and that the use of a shorter term product does not require additional HOME assistance compared to a 30-year loan.
 - Loan products used must generally allow loan-to-value (LTV) ratios of at least 95%. While assisted buyers are not required to be approved for loan amounts equal to 95% of the purchase price, buyers who use more restrictive lending products (such as those limiting the LTV to 80%) will not receive HOME assistance toward their purchase if they could otherwise afford the monthly payment on a larger loan. In short, buyers should obtain the largest loan they can reasonably afford, and the City will not subsidize purchases more deeply just to avoid mortgage insurance on higher LTV lending products.

Subordination of HOME/NSP-Funded Liens

- After providing assistance to eligible homebuyers, the City has an ongoing interest in the success of those buyers from the standpoint of an administrator of both the HOME & NSP programs as well as from the standpoint of a local government concerned about the impact of foreclosures on its residents and neighborhoods. To help prevent future foreclosures and to protect the City’s financial investment in assisted-units, subordination of HOME/NSP-funded liens to future refinancing by assisted buyers will only be considered under the following circumstances. (This policy will also apply to HOME/NSP-funded liens resulting from the homeowner rehabilitation programs.)
 - The new loan must be for one of the following purposes:

- To improve the rate and or term of the existing loan.
- For purposes of this requirement, the new loan may allow the assisted homeowner to finance their closing costs without being considered “cash out”. Additionally, nominal cash back at closing of less than \$100 resulting from last-minute adjustments to payoff figures, closing costs, tax/insurance escrows and the like will not be considered “cash out.”
- To take “cash out” through a refinancing transaction in order to complete needed repairs to the home.
- Any cash out refinancing must result in a total loan to value ratio (including the HOME loan) of 90% or less. The cash proceeds of the refinancing must be escrowed with the lender or City and disbursed directly to a contractor.
- The proposed new loan must meet all requirements in the Primary Loan Expectations section above.
- The proposed new loan must be affordable to the assisted owner within the lending ratios contained in the Buyer Expectations subsection herein. The assisted owner’s income must be re-verified prior to the refinancing, and the current income must be used to determine debt to income ratios. In no case may the monthly payment on the new loan exceed the original monthly payment by more than 10%. (Note, while the assisted owner’s income must be re-verified to evaluate the loan’s affordability, if the owner’s income has risen above 80% AMI there is no violation of HOME or 120%/50% for NSP. After the project is complete, there is no ongoing expectation that buyers will necessarily always remain low income.)

Overarching Program Regulations and Requirements

Recordkeeping

The City of Wilmington, HUD, the Comptroller General of the United States or any of their authorized representatives, has the right to access the Project and any books, documents, papers or other records of a HOME assisted unit.

Developers/owners will maintain all books and records pertaining to HOME assisted units with the provisions of 24 C.F.R. § 92.508 for a period of not less than five (5) years after the affordability period ends and all matters pertaining to the project (e.g., audit, disputes or litigation) are resolved under applicable federal or state laws, regulations or policies.

Developers/Owners shall maintain records for inspection by City in the checklists included in the following pages. The developer/owner will make any additional records requested available to the City of Wilmington upon request.

Environmental Review

The environmental effects of each activity carried out with HOME funds must be assessed in accordance with the provisions of the National Environmental Policy Act of 1969 (NEPA) and the related authorities listed in HUD's implementing regulations at 24 CFR parts 50 and 58.

Any funds committed to a HOME activity or project will be conditional on the completion of the environmental review and approval of the request for release of funds and related certification, except as authorized by 24 CFR part 58. No HOME funds will be disbursed without the establishment of an Environmental Review Record and the appropriate level of Review completed.

Lead Based Paint Hazards

The HOME Program requires owners/developers to take actions to reduce lead-based paint hazards in HOME-assisted units. Owners must comply with 24 CFR 35, the regulations implementing the Lead-Based Paint Poisoning Prevention Act along with requirements for dealing with lead-based paint found in the Uniform Physical Condition Standards (UPCS). Current Part 35 requirements stipulate that all occupants receive and acknowledge notice of the possible presence of lead paint.

Level of Assistance in Property	Hazard Reduction Requirements	Summary of Requirements
<p>Assistance of more than \$5,000 per unit up to and including \$25,000 per unit</p>	<p>Interim controls.</p>	<p>Interim controls means a set of measures designed to reduce temporarily human exposure or likely exposure to lead-based paint hazards.</p> <p>Once work is completed a passing an IL Dept of Health LEAD SAFE CERTIFICATE must be realized for the exterior, common spaces, and all assisted units.</p> <p>Interim controls include, but are not limited to, repairs, painting, temporary containment, specialized cleaning, clearance, ongoing lead-based paint maintenance activities, and the establishment and operation of management and resident education programs.</p>
<p>Assistance of more than \$25,000 per unit</p>	<p>Abatement of lead based Paint hazards.</p>	<p>Abatement means any set of measures designed to permanently eliminate lead-based paint or lead based paint hazards (see definition of “permanent”) on the exterior, common spaces, and all assisted units.</p> <p>Once work is completed a passing an IL Dept of Health Lead Free Certificate must be realized for the exterior, common spaces, and all assisted units.</p> <p>Abatement includes:</p> <p>(1) The removal of lead-based paint and dust lead hazards, the permanent enclosure or encapsulation of lead-based paint, the replacement of components or fixtures painted with lead-based paint, and the removal or permanent covering of soil-lead hazards; and</p> <p>(2) All preparation, cleanup, disposal, and post abatement clearance testing activities associated with such measures</p>

The Lead-Based Paint Poisoning Prevention Act applies to all units in a property assisted with HOME funds -- not only to HOME-assisted units. During the compliance review, staff will monitor

to ensure that the owner has conducted all necessary activities and maintained appropriate documentation in their files.

Owners/developers must be in compliance with 24 CFR 35 and Sections 302 and 401 (b) of the Lead-Based Paint Poisoning Prevention Act. This subpart implements the provisions of 42 U.S.C. 4852d, which impose requirements on the sale or lease of housing. The seller or lessor of housing shall:

- Disclose to the purchaser or lessee the presence of any known lead-based paint and/or lead-based paint hazards;
- Provide available records and reports;
- Provide the purchaser or lessee with a lead hazard information pamphlet;
- Give purchasers a 10-day opportunity to conduct a risk assessment or inspection; and
- Attach specific disclosure and warning language to the sales or leasing contract before the purchaser or lessee is obligated under a contract to purchase or lease target housing.

In addition, any disturbance of a painted surface on housing constructed prior to 1978 requires additional testing, notices and remediation as specified by 24 CFR35.

Lease Requirements

The lease between a tenant and an owner of rental housing assisted with HOME funds must be for not less than one year, unless by mutual agreement between the tenant and the owner.

Prohibited lease terms. The lease may not contain any of the following provisions:

- *Agreement to be sued.* Agreement by the tenant to be sued, to admit guilt, or to a judgment in favor of the owner in a lawsuit brought in connection with the lease;
- *Treatment of property.* Agreement by the tenant that the owner may take, hold, or sell personal property of household members without notice to the tenant and a court decision on the rights of the parties. This prohibition, however, does not apply to an agreement by the tenant concerning disposition of personal property remaining in the housing unit after the tenant has moved out of the unit. The owner may dispose of this personal property in accordance with State law;
- *Excusing owner from responsibility.* Agreement by the tenant not to hold the owner or the owner's agents legally responsible for any action or failure to act, whether intentional or negligent;
- *Waiver of notice.* Agreement of the tenant that the owner may institute a lawsuit without notice to the tenant;
- *Waiver of legal proceedings.* Agreement by the tenant that the owner may evict the tenant or household members without instituting a civil court proceeding in which the tenant has the opportunity to present a defense, or before a court decision on the rights of the parties;
- *Waiver of a jury trial.* Agreement by the tenant to waive any right to a trial by jury;
- *Waiver of right to appeal court decision.* Agreement by the tenant to waive the tenant's right to appeal, or to otherwise challenge in court, a court decision in connection with the lease; and
- *Tenant chargeable with cost of legal actions regardless of outcome.* Agreement by the tenant to pay attorney's fees or other legal costs even if the tenant wins in court proceeding by the owner against the tenant. The tenant, however, may be obligated to pay costs if the tenant loses.
- *Termination of tenancy.* An owner may not terminate the tenancy or refuse to renew the lease of a tenant of rental housing assisted with HOME funds except for serious or repeated violation of the terms and conditions of the lease; for violation of applicable Federal, State, or local law; for completion of the tenancy period for transitional housing; or for other good cause. To terminate or refuse to renew tenancy, the owner must serve written notice upon the tenant specifying the grounds for the action at least 30 days before the termination of tenancy.

Davis-Bacon Act:

Any contract for the construction of Affordable Housing with 12 or more units will require that all laborers and mechanics who are employed to perform work on any project, or any contractor or construction work which is financed, in whole or in part, with assistance which is received under the Housing and Community Development Act of 1974 shall be paid wages at rates which are not less than those that prevail in the locality for similar construction and shall receive overtime compensation in accordance with the Contract Work Hours and Safety Standards Act.

The contractor and its subcontractors shall also comply with all applicable Federal laws and regulations, which pertain to labor standards, including the minimum wage law.

Uniform Relocation Assistance

All owners/developers shall be in compliance with the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended (42 U.S.C. 4601 et seq.), in accordance with the following objectives:

- To ensure that owners of real property to be acquired for Federal and federally assisted projects are treated fairly and consistently, to encourage and expedite acquisition by agreements with such owners, to minimize litigation and relieve congestion in the courts, and to promote public confidence in Federal and federally-assisted land acquisition programs;
- To ensure that persons displaced as a direct result of Federal or federally assisted projects are treated fairly, consistently, and equitably so that such persons will not suffer disproportionate injuries as a result of projects designed for the benefit of the public as a whole; and
- To ensure that Agencies implement these regulations in a manner that is efficient and cost effective.

Conflict of Interest

No person who is an employee, agent, consultant, officer, or elected official or appointed official of the City of Wilmington or recipient which are receiving HOME funds of this section who exercise or have exercised any functions or responsibilities with respect to activities assisted with HOME funds or who are in a position to participate in a decision making process or gain inside information with regard to these activities, may obtain a financial interest or benefit from a HOME-assisted activity, or have an interest in any contract, subcontract or agreement with respect thereto, or the proceeds there under, either for themselves or those with whom they have family or business ties, during their tenure or for one year thereafter.

The conflict of interest provisions above apply to any person.

Construction Standards

Housing that is constructed or rehabilitated with HOME funds must meet all applicable local codes, rehabilitation standards, ordinances, and zoning ordinances at the time of project completion. Specifically, housing must meet the City of Wilmington's HOME Construction Standards (attached to this document) and must conform to any design plans and specifications provided as part of a developer or owner application.

Newly constructed housing must meet the current edition of the International Building Code (IBC) is a model building code developed by the International Code Council (ICC).

All other HOME-assisted housing (e.g., acquisition) must meet all applicable State and local housing quality standards and code requirements and if there are no such standards or code requirements, the housing must meet the housing quality standards in 24 CFR 982.401.

The housing must meet the accessibility requirements at 24 CFR part 8, which implements Section 504 of the Rehabilitation Act of 1973 (29 U.S.C. 794) and covered multifamily dwellings, as defined at 24 CFR 100.201, must also meet the design and construction requirements at 24 CFR 100.205, which implement the Fair Housing Act (42 U.S.C. 3601-3619).

Construction of all manufactured housing must meet the Manufactured Home Construction and Safety Standards established in 24 CFR Part 3280. These standards pre-empt State and local codes covering the same aspects of performance for such housing.

An owner of rental housing assisted with HOME funds must maintain the housing in compliance with all applicable State and local housing quality standards and code requirements and if there are no such standards or code requirements, the housing must meet the housing quality standards in 24 CFR 982.401.

The following requirements apply to housing for homeownership that is to be rehabilitated after transfer of the ownership interest:

Before the transfer of the homeownership interest, the City of Wilmington will:

- Inspect the housing for any defects that pose a danger to health; and
- Notify the prospective purchaser of the work needed to cure the defects and the time by which defects must be cured and applicable property standards met.

The housing must be free from all noted health and safety defects before occupancy and not later than 6 months after the transfer. The housing must meet the property standards attached to this section not later than 1 year after transfer of the ownership interest.

The City of Wilmington has adopted the following Residential code. Sec. 4-32. - Residential code adopted. The document entitled "The Residential Building Code of 2012" copies of which have been and are now on file in the city clerk's office and in the department of licenses and inspections and in the fire department, and which is incorporated in this subchapter by reference, and all of the nationally recognized standards referred to and incorporated into that code, together with any and all supplements thereto, but except as such articles and sections are deleted, modified, or amended and as otherwise set forth in this subchapter and this chapter, are adopted as the residential building code of the city. (Ord. No. 13-034(sub 2), § 3, 2-20-14)

Fair Housing:

Recipients of HOME funds are held to Title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000d-2000d-4), the Fair Housing Act (42 U.S.C. 3601 et seq.), E.O. 11063 20Title VI of the Civil Rights Act of 1964, P. L. 88-352 and the regulations of HUD with respect thereto, including 24 CFR, Parts 1.

Section 109 of the HCD Act of 1974, Title I, prohibits discrimination on the basis of race, color, national origin, disability, age, religion, and sex within Community Development Block Grant (CDBG) programs or activities. <http://www.hud.gov/progdsc/sec-109.cfm>

HOME recipients are prohibited from discriminating on the basis of:

- Race
- Color
- Religion
- National origin
- Disability Status (Including prior Alcohol & Illegal Substance Addictions)
- Familial status
- Ethnicity
- Gender
- Gender Identity
- Language(s) Spoken
- Literacy
- Sexual Orientation
- Veteran Status

Discrimination is prohibited in the assistance, tenant selection, sale, rental, and financing of dwellings. It is also prohibited in program administration and any enforcement mechanisms.

No person in the United States shall on the ground of race, color, national origin (or any of the other items listed above) be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving federal funding and/or assistance. Assistance includes:

- Grants and loans of Federal funds,
- The grant or donation of Federal property and interests in property,
- The detail of Federal personnel,
- The sale and lease of, and the permission to use (on other than a casual or transient basis), Federal property or any interest in such property without consideration or at a nominal consideration, or at a consideration which is reduced for the purpose of assisting the recipient, or in recognition of the public interest to be served by such sale or lease to the recipient, and
- Any Federal agreement, arrangement, or other contract which has as one of its purposes the provision of assistance.

Affirmative Marketing & Minority Outreach

Each HOME developer must adopt affirmative marketing procedures and requirements for rental and homebuyer projects containing 5 or more HOME- assisted housing units.

HOME developers shall use the Equal Housing Opportunity Slogan, logo, or statement must be in all advertisements, public service announcements, press releases, and information mailings. The HUD Fair Housing poster must be displayed in offices where rental activity takes place for all properties with five or more units.

Affirmative marketing steps consist of actions to provide information and otherwise attract eligible clients without regard to:

- Race,
- Color,
- National origin,
- Sex,
- Religion,
- Familial status or
- Disability.

The affirmative marketing procedures do not apply to families with Section 8 tenant-based rental housing assistance or families with tenant-based rental assistance provided with HOME funds.) The affirmative marketing requirements and procedures adopted must include:

- Methods for informing the public about Federal fair housing laws and the affirmative marketing policy;
- Procedures to inform and solicit applications from persons in the housing market area who are not likely to apply for the housing without special outreach (e.g., use of community organizations, places of worship, employment centers, fair housing groups, or housing counseling agencies);
- Records that will be kept describing actions taken to affirmatively market units and records to assess the results of these actions; and

Developers to the maximum extent possible, will be inclusive of minorities and women, and entities owned by minorities and women, including, without limitation, real estate firms, construction firms, appraisal firms, management firms, financial institutions, investment banking firms, underwriters, accountants, and providers of legal services, in all contracts entered into by the participating jurisdiction with such persons or entities, public and private, in order to facilitate the activities of the participating jurisdiction to provide affordable housing authorized under this Act or any other Federal housing law applicable to such jurisdiction.

(See attached Affirmative Marketing Form.)

Housing Accessibility

The City of Wilmington acknowledge all federal, state and local laws and has adopted the following:

- Title VIII of the Civil Rights Act of 1968 (Fair Housing Act) protects race, religion, sex and national origin
- The Fair Housing Amendments Act of 1988 (Amendments Act - FHAA) added disability and familial status
- The Americans with Disabilities act (ADA) of 1990 addresses public accommodations (rental offices and common areas are considered public accommodations)
- Section 504 of the Rehabilitation Act of 1973 (Section 504) applies to those receiving federal assistance

Disability Rights in Housing

Federal laws define a person with a disability as "Any person who has a physical or mental impairment that substantially limits one or more major life activities; has a record of such impairment; or is regarded as having such impairment."

In general, a physical or mental impairment includes hearing, mobility and visual impairments, chronic alcoholism, chronic mental illness, AIDS, AIDS Related Complex, and mental retardation that substantially limits one or more major life activities. Major life activities include walking, talking and hearing, seeing, breathing, learning, performing manual tasks, and caring for oneself. Disability Rights in Private and Public Housing regardless of whether you live in private or public housing, Federal laws provide the following rights to persons with disabilities:

- Prohibits discrimination against persons with disabilities. It is unlawful for a housing provider to refuse to rent or sell to a person simply because of a disability. A housing provider may not impose different application or qualification criteria, rental fees or sales prices, and rental or sales terms or conditions than those required of or provided to persons who are not disabled.

Example: A housing provider may not refuse to rent to an otherwise qualified individual with a mental disability because they are uncomfortable with the individual's disability. Such an act would violate the Fair Housing Act because it denies a person housing solely on the basis of their disability.

- Requires housing providers to make reasonable accommodations for persons with disabilities. A reasonable accommodation is a change in rules, policies, practices, or services so that a person with a disability will have an equal opportunity to use and enjoy a dwelling unit or common space. A housing provider should do everything they can to assist, but they are not required to make changes that would fundamentally alter the program or create an undue financial and administrative burden. Reasonable accommodations may be necessary at all stages of the housing process, including application, tenancy, or to prevent eviction.

Example: A housing provider would make a reasonable accommodation for a tenant with mobility impairment by fulfilling the tenant's request for a reserved parking space in front of the entrance to their unit, even though all parking is unreserved.

- Requires housing providers to allow persons with disabilities to make reasonable modifications. A reasonable modification is a structural modification that is made to allow persons with disabilities the full enjoyment of the housing and related facilities.

Examples of a reasonable modification: would include allowing a person with a disability to install a ramp into a building, lower the entry threshold of a unit, or install grab bars in a bathroom.

Reasonable modifications are usually made at the resident's expense. However, there are resources available for helping fund building modifications. Additionally, if you live in federally assisted housing the housing provider may be required to pay for the modification if it does not amount to an undue financial and administrative burden.

For more information, see the Reasonable Accommodations section of the Section 504 Frequently Asked Questions page.

http://portal.hud.gov/hudportal/HUD?src=/program_offices/fair_housing_equal_opp/disabilities/sect504

Housing Accommodations

New multifamily housing must be designed and constructed to be accessible. In covered multifamily housing consisting of 4 or more units with an elevator built for first occupancy after March 13, 1991, all units must comply with the following seven design and construction requirements of the Fair Housing Act:

- Accessible Entrance on an Accessible Route
- Accessible Public and Common-Use Areas
- Usable Doors
- Accessible Route Into and Through the Dwelling Unit
- Accessible Light Switches, Electrical Outlets, Thermostats, and Environmental Controls
- Reinforced Walls in Bathrooms
- Usable Kitchens and Bathrooms
- In covered multifamily housing without an elevator that consists of 4 or more units built for first occupancy after March 13, 1991, all ground floor units must comply with the Fair Housing Act's seven design and construction requirements.

For information on how to comply with the physical accessibility requirements of the Fair Housing Act, visit the Fair Housing Accessibility FIRST Web site: <http://www.fairhousingfirst.org/>

These requirements apply to most public and private housing. However, there are limited exemptions for owner-occupied buildings with no more than four units, single family housing sold or rented

without the use of a broker, and housing operated by organizations and private clubs that limit occupancy to members.

If you live in federally assisted multifamily housing consisting of 5 or more units, 5 percent of these units (or at least one unit, whichever is greater) must meet more stringent physical accessibility requirements. Additionally, 2 percent of units (or at least one unit, whichever is greater) must be accessible for persons with visual or hearing disabilities. For more information, visit Section 504 Questions and Answers:

http://portal.hud.gov/hudportal/HUD?src=/program_offices/fair_housing_equal_opp/disabilities/sect504faq

People with Disabilities in Federally Assisted Housing

Federal law makes it illegal for an otherwise qualified individual with a disability to be excluded, solely because of his or her disability, from programs receiving federal financial assistance.

For more information on the rights of persons with disabilities in federally assisted housing as well as the responsibilities of housing providers who receive federal financial assistance, visit our Section 504: Disability Rights in HUD Programs site:

http://portal.hud.gov/hudportal/HUD?src=/program_offices/fair_housing_equal_opp/disabilities/sect504

Zoning and Land Use: It is unlawful for local governments to utilize land use and zoning policies to keep persons with disabilities from locating to their area. For more information, see the Joint Statement of DOJ and HUD on Group Homes, Local Land Use, and the Fair Housing Act:

http://searchjustice.usdoj.gov/search?q=crt%20housing%20final8_1&q=site%3Awww.justice.gov%2Fcr&sort=date%3AD%3AL%3Ad1&output=xml_no_dtd&client=default_frontend&proxystylesheet=default_frontend&site=default_collection

State and Local Laws: Many states and localities have fair housing laws that are substantially equivalent to the Federal Fair Housing Act. Some of these laws prohibit discrimination on additional bases. Some of these laws may impose more stringent design and construction standards for new multifamily housing.

The Americans with Disabilities Act

In most cases, the ADA does not apply to residential housing. Rather, the ADA applies to places of public accommodation such as restaurants, retail stores, libraries, and hospitals as well as commercial facilities such as office buildings, warehouses, and factories. However, Title III of the ADA covers public and common use areas at housing developments when these public areas are, by their nature, open to the general public.

For example, it covers the rental office since the rental office is open to the general public.

Title II of the ADA applies to all programs, services, and activities provided or made available by public entities. This includes housing when the housing is provided or made available by a public entity. For example, housing covered by Title II of the ADA includes public housing authorities that meet the ADA definition of "public entity," and housing operated by States or units of local government, such as housing on a State university campus.

For more information on the Americans with Disabilities Act, visit the Department of Justice ADA Home Page. <http://www.ada.gov/>

For information on how HUD processes housing discrimination complaints, see Fair Housing-It's Your Right:

http://portal.hud.gov/hudportal/HUD?src=/program_offices/fair_housing_equal_opp/FHLaws/yourri ghts

US Department of Housing & Urban Development Office of Fair Housing & Equal Opportunity
UFAS Accessibility Checklist:

http://portal.hud.gov/hudportal/documents/huddoc?id=UFASAC_PHAs5708.pdf

Financial Management Requirements:

Projects and programs receiving HUD funds must abide by the financial management requirements of the Federal Office of Management and Budgets which pertain to their particular type of organization, whether it is an institution of Higher Education, a hospital, other non-profit, a state, a local government, etc. For instance, a CHDO serving as a sub-recipient for the Consortium and as a development organization has different OMB requirements based on their activity.

Some of the basic financial requirements are:

2 CFR, Part 220: Uniform Administrative Requirements for grants and Agreement with Institutions of Higher Education, Hospitals and Other Non-Profit Organizations

2 CFR, Part 225: Audits of States and Local Governments

2 CFR, Part 230: Audits of Non-Profit Organizations

2 CFR, Part 413: Cost Principles for Non-Profit Organizations

The Office of Management and Budget (OMB), in its efforts to deliver on the promise of a 21st-Century government that is more efficient, effective and transparent, has streamlined the OMB Circulars on Administrative Requirements, Cost Principles, and Audit Requirements for all Federal awards into one document, referred to as the Super Circular. The Super Circular combines eight previous federal regulations into comprehensive guidance codified at 2 Code of Federal Regulations (CFR) Part 200 (Subparts A – F). These changes will improve administration of federal grant operations from the new uniform application process to the 'close-out' process. These changes modernize cost accounting, and improve the audit process, where the threshold for a Single Audit has been increased to \$750,000 in annual federal expenditures. Museums not expending more than \$750,000 are not required to have a Single Audit; however, the administrative requirements and cost principles still apply.

Previous OMB Circulars combined into the new Super Circular include: Cost Principles Circulars A-21 for Education Institutions; A-87, for State & Local Governments; and A-122 for Non-Profit Organizations; the Circular A-89, Catalog of Federal Domestic Assistance; the Administrative Requirements Circulars A-102, for State and Local Governments; A-110 for Institutions of Higher Education, Hospitals and Other Non-Profit Organizations; and the Circulars A-133 Single Audit Guidance and A-50 Audit Follow-up. The new Super Circular breaks down into the following subparts: Subpart A–Acronyms and Definitions; Subpart B–General Provisions; Subpart C–Pre-Federal Award Requirements; Subpart D–Post Federal Award Requirements; Subpart E–Cost Principles; and Subpart F–Audit Requirements.

Other Federal Requirements

The Federal requirements set forth in 24 CFR part 5, subpart A, are applicable to participants in the HOME program. The requirements of this subpart include:

- Nondiscrimination and equal opportunity;
- Disclosure requirements;
- Debarred, suspended or ineligible contractors; and
- Drug-free workplace.

The nondiscrimination requirements at section 282 of the Act are applicable. These requirements are waived in connection with the use of HOME funds on lands set aside under the Hawaiian Homes Commission Act, 1920 (42 Stat.108).

Calculating Annual (Gross) Income

The annual income definition found at 24 CFR Part 5 is used by a variety of Federal Programs including Section 8, public housing and the Low-Income Housing Tax Credit Program and will be used as the qualifying standard for City of Wilmington housing programs. Annual income is used to determine program eligibility and, in some programs, the level of assistance the household will receive. This definition was formerly commonly referred to as the Section 8 definition.

The Part 5 definition of annual income is the gross amount of income of all adult household members that is anticipated to be received during the coming 12-month period. Each of the italicized phrases in this definition is key to understanding the requirements for calculating annual income:

- **Gross amount.** For those types of income counted, gross amounts (before any deductions have been taken) are used;
- **Income of all adult household members.** The Part 5 definition of annual income contains income “inclusions” – types of income to be counted – and “exclusions” – types of income that are not considered (for example, income of minors); and
- **Anticipated to be received.** The Part 5 annual income is used to determine eligibility and the amount of Federal assistance a family can receive. Therefore, Developers shall use a household’s expected ability to pay, rather than past earnings, when estimating housing assistance needs.

Beneficiaries of HOME funds- homebuyers, homeowners, or tenants- must be determined income eligible based upon a review of their projected **gross anticipated annual income** by all adult household members (everyone 18 years of age and older).

- The income determination cannot be more than **6 months** old at the time the assistance is received. (24 CFR 92.203)
- The income of household receiving tenant based rental assistance or living in rental housing cannot exceed the HOME income limits for their designated unit over time.
- ALL HOME recipients are required to document:
- Income of ALL Adults (persons 18 and over), even if there is no income
- If there are more than one ADULT in a household, documentation must be provided for each ADULT household member.
- If an adult has more than one income source or job, each source of income should have its own documentation (i.e. paystubs for employment & RIW benefit letter for Jane Smith).

To determine if applicants are income eligible, recipients shall review and verify income using the following (but not limited to):

Pay stubs

- SSI/SSDI benefit letters
- Pension Statements

- Wage statements
- Interest statements
- Unemployment compensation statements
- Tax returns, w-2 forms
- Profit and loss statement from business
- Other Third party documentation (bank statements, etc)

Recipients of the City's HOME program must use Part 5 definition for determining income. Remember that the Part 5 definition includes assets in its calculation of income.

Monitoring & Project Oversight

City of Wilmington will review the proper maintenance, marketing, occupancy, rents and utility allowances of housing funded with HOME funds by applying the procedures that are described in detail in this document.

HOME activities will be evaluated on the basis of the following program areas:

- Adherence to HOME guidelines, procedures and regulations for programs as a whole and for individual projects
- Internal Procedures and policies and those of program partners
- Overall administration and management
- Fair Housing
- Construction quality, ongoing housing condition and maintenance
- Davis-Bacon, Lead Based Paint, and other Federal Requirements as applicable
- Cost reasonableness and financial accountability
- Environmental Review

The City of Wilmington may withhold, reduce, or terminate funding to a developer or subrecipient where deficiencies have not been sufficiently corrected to the City of Wilmington and/or HUD's satisfaction.

Overall Approach and Project Selection for Monitoring

Project oversight will be provided on all active development projects and will be similar to but generally more rigorous than ongoing monitoring.

Ongoing monitoring will be based primarily on the analysis of regular reports, reports from regular inspections and documents submitted for review as projects are developed and managed through the affordability period. In addition, periodic reviews of market data and cost data may be undertaken. This desk monitoring will be supported by field visits to funded organizations and examination of housing product.

The first line of approach for monitoring will be the maintenance of files and file checklists to assure that all required documentation is produced, reviewed and on hand as needed.

The selection and prioritization of documents, files and organizations to be monitored will utilize a risk reduction approach. The following priorities will be considered:

- The early part of a key project phase such as acquisition, construction or rentup will take absolute priority over other efforts and all development projects will be monitored and inspected at these early phases.

Beyond that basic priority, the following factors will also affect priorities:

- New organizations and any organization with unresolved compliance issues,

Particular functions being carried out by new staff.

- Any project that may have special compliance challenges or that is substantially different in terms of size, complexity, or other factors from other projects the PJ or the developer has undertaken.
- Because the HOME-assisted projects have ongoing affordability requirements, the City's staff will also monitor and inspect a sample of units in completed projects.

Contract Requirements for Partners

All contracts and agreements include reporting requirements for developers and agreement are subject to FOIA as open records and open sites.

Terms include:

- Agreement to submit or open any and all records and sites upon request;
- Notification by inclusion in the funding agreement of required records;
- Reporting requirements specific to each project;
- Budgets and limitations on budget changes.

Monitoring Tools, Resources and Readiness Procedures

Monitoring staff will maintain up to date files for the monitoring activity as a whole, each activity type, and each project. Tools and documents to be maintained in a ready state include:

- HOME Program Monitoring Matrix (electronic file)
- Templates for File Checklists and document review checklists (attached)
- HUD required checklists found at http://portal.hud.gov/hudportal/HUD?src=/program_offices/comm_planning/affordablehousing/training/web/checkup/performance/monitoringtools
- IDIS reports and Web-based Performance Reports (PR16, PR 25, PR 27, Snapshot and Open Activities reports)
- Relevant correspondence by developer or project
- Previous monitoring reports and audits by developer or project
- Project budgets and contractual performance requirements by project
- Agreement and covenant templates
- Current and historic files of HOME income, rent, subsidy and sale price/valuation limits as regularly published by HUD

Resources required for monitoring include: the HOME final rule, as amended; applicable cross-cutting regulations; CPD Notices dealing with HOME; the Technical Guide for Determining Income and Allowances for the HOME Program (HUD-1780-CPD).

Note that oversight and monitoring rely on the use of the tools indicated above and addressing the issues raised by evaluating performance in relation to the published checklists and limits, and in relation to the contractual terms for each project is the essence of effective action.

Schedule Overview

The City will monitor on ongoing, annual and situational bases. Schedule details relating to each regulation and each stage of development may be found in the relevant attachments. In addition to the overall schedule and approach in this plan, a specific schedule may be generated for each developer and project. Here is a summary of the City's approach and basic scheduling standards.

Situational

Certain reviews and monitoring will be scheduled or carried out in response to events, especially for projects under planning and development, based on the specific stage or circumstances of the project. This will include:

- Acquisition and Procurements
- Disbursement Requisitions
- Relocation
- Contracts prior to execution
- Design review; 504 compliance
- Environmental review
- Construction-related wages, hours, Section 3, Equal Opportunity, Debarment, and other labor related interviews and document reviews
- All critical construction phases will be inspected on site by City building officials including a pre-commitment inspection to determine deficiencies and reasonableness of the proposed construction and costs.
- Any complaints by neighbors or parties to the project, or un-reconciled paperwork, may call for an on-site inspection, or in-person interview.
- Monitors must also confirm that project underwriting has occurred. Those procedures are addressed in the Project Approval and Underwriting section.

For rental projects, situational monitoring will also include:

- Review of initial affirmative marketing, tenant selection and screening, and lease contents

Review of initial income certifications and rents

For homebuyer units, situational monitoring will also include:

- Review of initial affirmative marketing, homebuyer selection and screening
- Review of initial income certifications and affordability for homebuyers
- Review of covenants

Ongoing

All expenditure requests will be reviewed for proper documentation (see also attachment on payment processing procedures), completion of construction costs charged, if applicable, and reconciled with

budget. (On some projects, construction completion payments may be based on certification by supervising architect.)

Project schedule and timeliness of progress will be monitored.

Annual

Each year various city staff as indicated below will review:

- Overall performance and financial health of the developer;
- Accounting procedures and records;
- Status and certification of CHDO, if applicable;
- For rental property:
 - Condition of property
 - Proper occupancy and rents according to HOME and other program regulations
 - Affirmative marketing procedures
 - Fair housing and tenant selection;
 - Lease provisions
 - Financial health of property
- For homebuyer property
 - Occupancy as principal residence
 - Proper enforcement of covenants and loan agreements

Pre-on-site-Monitoring Preparation:

Prior to an on-site monitoring visit, the City will provide written notification of the visit to recipient. The notice will provide the following information:

- Dates and time of the monitoring visit
- A copy of the HOME Monitoring Checklist
- A list of files to be reviewed
- A list of properties to be inspected
- The recipient will be asked to provide the City with the following:
 - Disbursement and expenditure reports
 - Agreements/contracts
 - Policy guidelines and procedures, administrative plans, and operation manuals
 - Beneficiary data

Staff will provide program monitoring over three phases:

1. Contract Development Phase

- Ensuring that projects are consistent with the Consolidated Plan
- Ensuring that all Environmental Review requirements have been met
- Ensuring clients are income-eligible

2. Development Phase

- Ensuring that project costs, budgets, and timelines are adhered to

- Ensuring conformance to HOME standards through periodic property inspections

3. Post-Development Phase (Long-Term)

- The duration and frequency of on-sight subrecipient monitoring and inspections is based on the length of the affordability period and the total number of project units.

Project Monitoring Plan:

A written report will be prepared and provided to the recipient following the completion of each monitoring review. The report will include the following information:

- An explanation of the purpose and scope of the review
- A list of findings, comments, recommendations and corrective actions to be taken
- A list of the files reviewed
- A list of the houses/units inspected
- A summary of the project funds expended to date
- An evaluation of project performance to date
- A time frame for taking corrective action

Follow up and Enforcement Actions:

Failure by a developer or owner to carry out corrective action as specified within the specified timeline will result in notification to the Director of Real Estate and Housing regarding next steps for enforcement or collection of funds.

HOME Resale/Recapture Policy

City of Wilmington
HOME Investment Partnership Program
Resale/Recapture Policy

Introduction:

The City of Wilmington is a participating jurisdiction in HUD's HOME Investment Partnership Program (HOME). HOME is authorized under Title II of the Cranston-Gonzalez National Affordable Housing Act (HOME statute). As a participating jurisdiction, the City of Wilmington assists low-income homebuyers with the acquisition, rehabilitation, and construction of single-family, for-sale housing. HUD requires participating jurisdictions to establish written resale and/or recapture policies that comply with the HOME statute regulatory requirements and that secure the affordability of HOME-assisted housing units for low-income homebuyers.

City of Wilmington Resale Policy:

Under most circumstances (except as noted below under the *City of Wilmington's Recapture Policy*), this *City of Wilmington Resale Policy* will apply to any HOME-assisted housing units in order to maintain the affordability of such HOME-assisted units throughout the entire affordability period. The affordability period is determined by considering the amount of HOME funds given directly to the original homebuyer and those subsidies provided to the developer of the housing unit for site preparation or improvement or construction materials and labor. When no direct subsidies are provided to the homebuyer of a HOME-assisted housing unit, the resale method must be utilized.

The resale method limits the homebuyer's ability during the affordability period to sell its HOME-assisted housing unit to anyone other than a HOME-eligible buyer. Resale restrictions shall be imposed through the recording of deed restrictions and covenants, which require that that such housing unit only be sold during the affordability period to a low-income individual or family that will use the housing unit as their principle residence. During the affordability period, any subsequent property owner will be subject to the same resale restrictions for the remainder of the affordability period as the original homebuyer, which requires the unit to be affordable to a reasonable range of low-income buyers and families during the affordability period. The City of Wilmington defines low-income buyers and families by identifying those populations of potential homebuyers it will target for the succeeding sale and purchase of the housing unit, as well as what is economical for the community. The term "low income family" shall mean a family whose gross annual income does not exceed 80% of the median family income for the geographic area as published annually by HUD. As a guideline, the purchasing family should pay no more than 30% of its gross family income towards the principal, interest, taxes, and insurance for the property on a monthly basis.

Notwithstanding the restrictions imposed by the resale method, the original homebuyer is entitled to receive a "fair return" on their total investment when they seek to sell the HOME-assisted housing unit. A "fair return" is determined by first adding the amount of the original homebuyer's initial investment in the housing unit (which initial investment shall include the homebuyer's down payment and/or closing costs made at the time of purchase, if any) with the

cost of any capital improvements¹ made to the structure or major system of the home (the aggregate amount after adding the initial investment and the cost of any capital improvements is hereinafter referred to as the “Total Homebuyer Investment”). Once the amount of the Total Homebuyer Investment has been determined, such Total Homebuyer Investment shall be multiplied by the percentage change in the Housing Price Index during the original homebuyer’s period of ownership (the product of such calculation being the “HPI Change Amount”). Once the HPI Change Amount has been determined, a “fair return” shall mean the sum of the Total Homebuyer Investment and the HPI Change Amount.

Calculating Fair Return on Investment – EXAMPLE

1. Initial investment: The original homebuyer put down \$5,000 earnest money at the signing of the sales contract one year ago.
2. Capital improvements: The original homebuyer had a fence installed this past year for a cost of \$2,000.
3. Percentage change in HPI: 4.4% for the year.²

$(\$5,000 + \$2,000) \times 4.4\% = \$308$ fair return on initial and capital investments
 $\$5,000 + \$2,000 + \$308 = \$7,308$ total return to the original homebuyer at sale
(assuming no decline in housing market)

City of Wilmington Recapture Policy:

The *City of Wilmington Resale Policy* outlined above will apply to most HOME homebuyer activities. However, the *City of Wilmington Recapture Policy* applies in a few limited circumstances identified below, such as when the homebuyer is subsidized in the purchase of a HOME-assisted unit by the Neighborhood Stabilization Program (NSP). NSP, through HUD, provides assistance to state and local governments to acquire and redevelop foreclosed properties. HUD has provided the Delaware State Housing Authority (DSHA) with funds, which DSHA has in turn allocated to sub-grantees such as the City of Wilmington. The City of Wilmington uses NSP funds to buy and restore residential properties for resale, rent or redevelopment, as well as establish financing mechanisms for homebuyers.

Individuals or families for which NSP has subsidized their purchase of HOME-assisted units are subject to this *City of Wilmington Recapture Policy*. This policy mandates that the amount of HOME funds subject to recapture shall be equal to the amount of HOME assistance funding provided that enabled the homebuyer to buy the dwelling unit, which shall include any reductions to the purchase price from the fair market value of the housing unit to an affordable price, but which shall not include development subsidies, or the negative difference between the

¹ As defined by IRS Publication 523, capital improvements increase the value of property or lengthen the life of the property. Examples include, but are not limited to, putting a recreation room in an unfinished basement, adding another bathroom or bedroom, putting up a fence, putting in new plumbing or wiring, installing a new roof.
<https://www.irs.gov/pub/irs-pdf/p523.pdf>.

² See Federal Housing Finance Agency, *News Release*, pg. 17 (Feb. 26, 2019),
https://www.fhfa.gov/AboutUs/Reports/ReportDocuments/2018Q4_HPI.pdf. The City of Wilmington also uses the HPI calculator to determine current estimated value of HOME-assisted units.
<https://www.fhfa.gov/DataTools/Tools/Pages/HPI-Calculator.aspx>.

cost of producing the housing unit and the fair market value of such housing unit. In addition to NSP subsidies, First-time Homeowner loans shall be subject to the recapture method.

When the recapture method is triggered, the City of Wilmington requires the recapture of the HOME assistance funding at the time of sale of the housing unit, subject to the forgiveness of a portion of the HOME assistance funding required to be recaptured based on the length of time the homebuyer occupies the home in relation to the affordability period (e.g., homebuyer receives \$4,000 down payment and settlement aid, which carries a 5-year affordability period. If the homebuyer decides to sell at the end of two years, two-fifths, or \$1,600 of the recapture payment would be forgiven, resulting in a balance of \$2,400 being repaid to the HOME program from the net proceeds of the sale.).

Delaware CoC System Performance Report



Delaware Continuum of Care

Achieving an End to Homelessness:
Performance in Delaware's Homeless Response System

July 2020

Produced by:

Delaware Continuum of Care System Performance Committee *In
partnership with*
Housing Alliance Delaware, Inc.

Report Contents

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I. Introduction

System performance measures are community-wide measures that allow us to better understand the extent of homelessness in our communities and how we are doing in our shared work to end homelessness. These measures help us to identify areas where we can improve and develop strategic and coordinated ways to implement change where needed.

In Delaware we are working to achieve an effective end to homelessness. When a community has achieved an effective end to homelessness, homelessness is:

- **RARE:** Very few people will experience homelessness. Homelessness is no longer commonplace.
- **BRIEF:** If people do experience homelessness, they do so for a very short period of time before being connected to permanent housing and supportive services.
- **AND, NON-RECURRING:** Once someone is re-stabilized in permanent housing, our community provides the support and assistance necessary to prevent them from returning to homelessness again.

In 2009 the McKinney-Vento Homeless Assistance Act was amended by the Homeless Emergency Assistance and Rapid Transition to Housing (HEARTH) Act, which introduced the provision for communities to submit system-level performance reports to the US Department of Housing and Urban Development (HUD) on an annual basis. The Act included selection criteria for HUD to use when awarding funding to Continuums of Care (CoCs), which includes the submission of these system performance reports. Additionally, these reports allow HUD to assess progress towards ending homelessness nationally.

The performance data in this report was submitted to the US Department of Housing and Urban Development in February 2020 by Housing Alliance Delaware on behalf of the Delaware Continuum of Care. All performance data come from the data entered into CMIS (Community Management Information System) by homeless assistance providers in Delaware.

System performance measures include:

1. Length of Time Homeless
2. Returns to Homelessness
3. Change in Point in Time Counts
4. Total Number of People who Experience Sheltered Homelessness
5. Number of People who Experience Homelessness for the First Time
6. Rate of Permanent Housing Exits
7. Housing Stability in Permanent Supportive Housing
8. Income Growth in Continuum of Care funded Projects

II. Reporting Period

The data presented in this report compare 3 reporting periods following the federal fiscal year:

- October 1, 2016 to September 30, 2017 (FY17)
- October 1, 2017 to September 30, 2018 (FY18)
- October 1, 2018 to September 30, 2019 (FY19)

III. Highlights

From October 1, 2018 – September 30, 2019:

- 2,090 people, including adults and children, slept in an emergency shelter or transitional housing facility
- People experienced homelessness for an average of 113 days. This is an 11 day, or 11%, increase from the previous year.
- 19% of people who moved from homelessness to housing returned to homelessness. This is a decrease of 4% from the previous year.
- 72% of people who experienced homelessness were homeless for the first time. This is a 4% increase from the previous year.
- 45% of people that experienced homelessness moved from homelessness to permanent housing.
- 98% of clients served by permanent supportive housing (PSH) remained stably housed. This remained stable from FY18 to FY19.
- 30% of adults increased their income while being served by a Continuum of Care funded project. This remained stable from FY18 to FY19.

IV. Homeless Response System Resource Inventory

The beds and housing units reported here are those dedicated to serving people who are experiencing homelessness. Beds in institutional settings that are not specifically dedicated for use by persons who are experiencing homelessness (such as detox facilities, treatment centers, emergency rooms, and Oxford houses for example) are not included. Similarly, mainstream subsidized housing resources that are not dedicated to serving people experiencing homelessness are not included (such as Housing Choice Vouchers, Low Income Housing Tax Credit Units, State Rental Assistance Program Vouchers, etc.).

Homeless Response Project Types		
Temporary Shelter	Emergency Shelter (ES)	ES provides temporary, short-term sleeping accommodations to persons experiencing homelessness. This category includes year-round ES, weather-related or seasonal ES (such as Code Purple sanctuary), and vouchers for hotels and motels paid for by the state or local charitable organization.
	Transitional Housing (TH)	TH is a medium-term temporary accommodation where a person experiencing homelessness can typically stay for no more than 24 months.
Permanent Housing	Rapid Re-Housing (RRH)	RRH is a permanent housing intervention for homeless households. RRH provides short to medium term financial assistance to help the household quickly access permanent rental housing (such as security deposit, utility assistance, rental assistance, etc.), and access to supportive services to help the household stabilize and retain housing.
	Permanent Supportive Housing (PSH)	PSH is a long-term housing intervention that includes a permanent housing subsidy and ongoing access to intensive supportive services. PSH is provided to homeless households with the highest needs, many of whom have disabling conditions and meet the HUD definition of chronically homeless ¹ upon entry. PSH includes beds that are funded by the HUD and the VA through HUD-VASH program for Veterans.
	Other Permanent Housing (OPH)	PH for people who were homeless without the disabling condition entry condition. These projects may or may not have supportive services for residents.

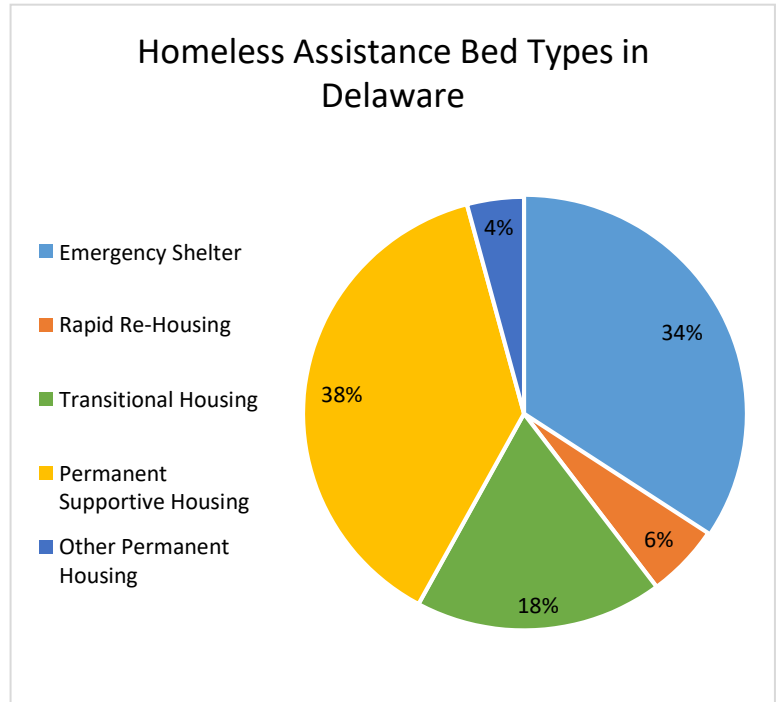
Bed Counts: There are a total of 2,403 beds in Delaware’s homeless response system in the 2019. Of those beds, 1,261 (52%) are temporary shelter beds, such as emergency shelter, transitional housing, hotel/ motel vouchers, domestic violence shelters, or weather-related beds such as a Code Purple sanctuary. There are 1,142 (48%) permanent housing beds for households experiencing homelessness through Rapid Re-housing, Permanent Supportive Housing, and Other Permanent Housing.

¹An individual who (a) i. Is homeless and lives in a place not meant for human habitation, a safe haven, or in an emergency shelter; and ii. Has been homeless and living or residing in a place not meant for human habitation, a safe haven, or in an emergency shelter continuously for at least one year or on at least four separate occasions in the last 3 years for a cumulative total of 12 months or more; and iii. Can be diagnosed with one or more of the following conditions: substance use disorder, serious mental illness, developmental disability (as defined in section 102 of the Developmental Disabilities Assistance Bill of Rights Act of 2000 (42 U.S.C. 15002)), post-traumatic stress disorder, cognitive impairments resulting from brain injury, or chronic physical illness or disability. (b) A family with an adult head of household (or if there is no adult in the family, a minor head of household) who meets all of the criteria in paragraph (1) of this definition, including a family whose composition has fluctuated while the head of household has been homeless.

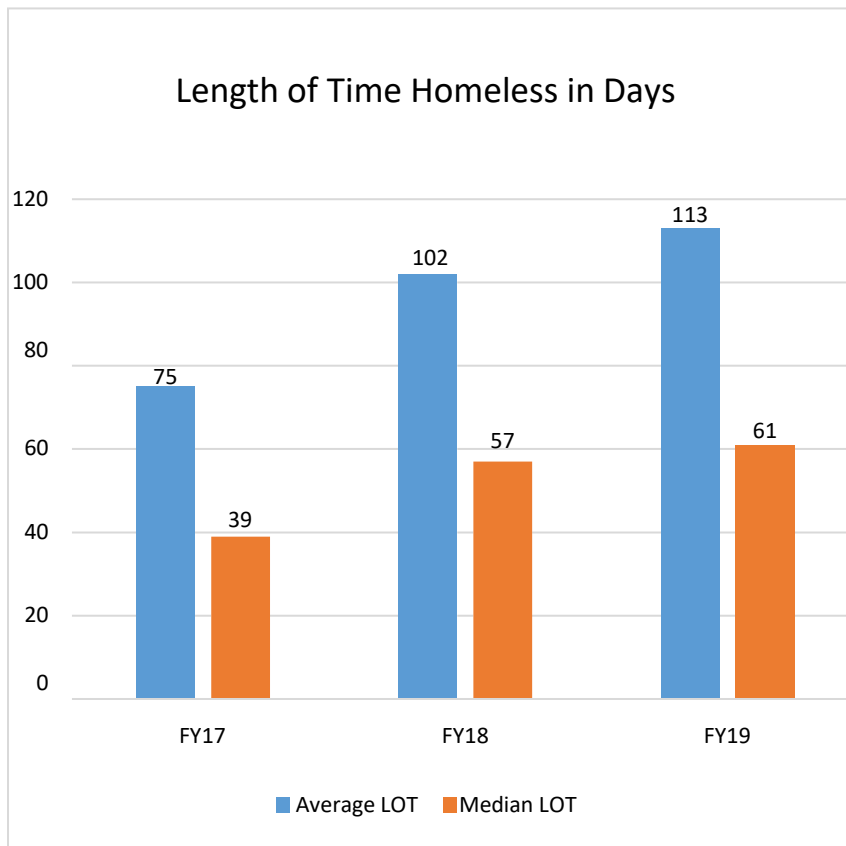
Bed Types: There are 824 Emergency Shelter beds (including 92 for people fleeing domestic violence), 437 Transitional Housing beds, 131 Rapid Re-Housing beds, 911 Permanent Supportive Housing beds, and 100 Other Permanent Housing beds in Delaware in 2019.

Of the 911 PSH beds in Delaware, 744 (82%) provide housing to the chronically homeless population. The other 18% are HUD-VASH beds for homeless veterans. These housing vouchers are administered by local housing authorities in partnership with the Wilmington VA Medical Center.

Of the 1,261 emergency beds, 36% are in New Castle County, 21% are in Kent County, and 11% are in Sussex County.



VI. System Performance Measures



Length of Time Homeless

This measure tells us how quickly people who are experiencing homelessness move back into permanent housing in our community. The longer someone is homeless the more likely they are to have deteriorating mental and/or physical health, aggravated substance abuse problems, or the loss of familial or other community supports. As a community we are working to decrease the average length of time that an individual or family is homeless in Delaware.

In FY19 people in Delaware experienced homelessness for an average of 113 days. This shows an increase of about 11%. This increase in length of time is contributed largely in part to large PSH

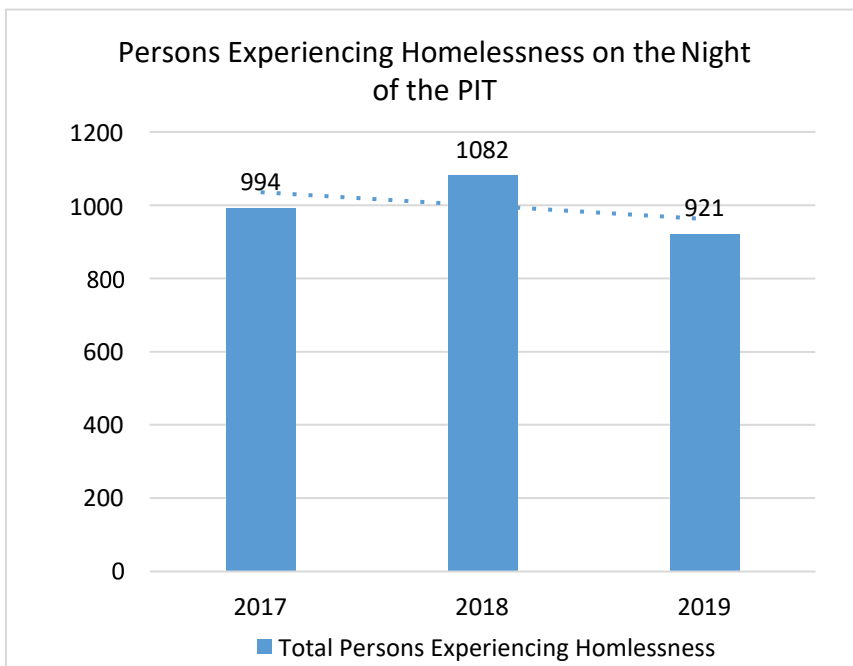
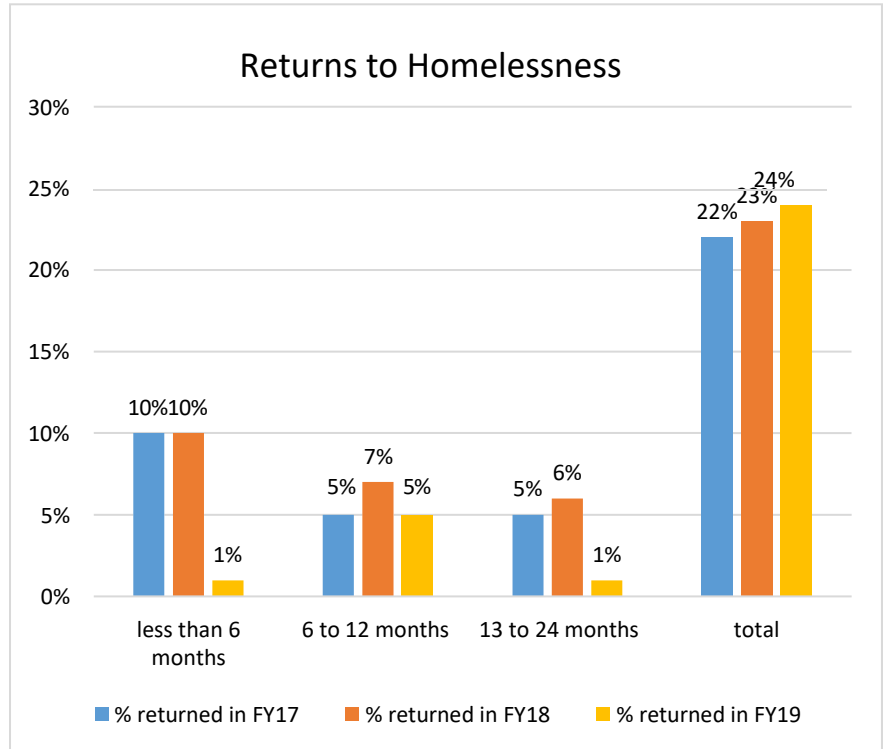
and RRH priority wait lists and lack of permanent housing inventory. On average, only 3 PSH referrals were requested and sent each month in FY19 (25 households totaling 32 individuals). There are 75 clients on the PSH priority wait list.

Returns to Homelessness

This measure tells us the rate at which people who move from homelessness to permanent housing are returning to homelessness again in our communities.

This measure includes all clients who exited to a permanent housing destination from emergency shelter (ES), transitional housing (TH), rapid re-housing (RRH) or permanent supportive housing (PSH). Of those clients, it calculates how many returned to homelessness within 2 years, and how quickly they returned.

In FY19, 24% of people returned to homelessness within 2 years.



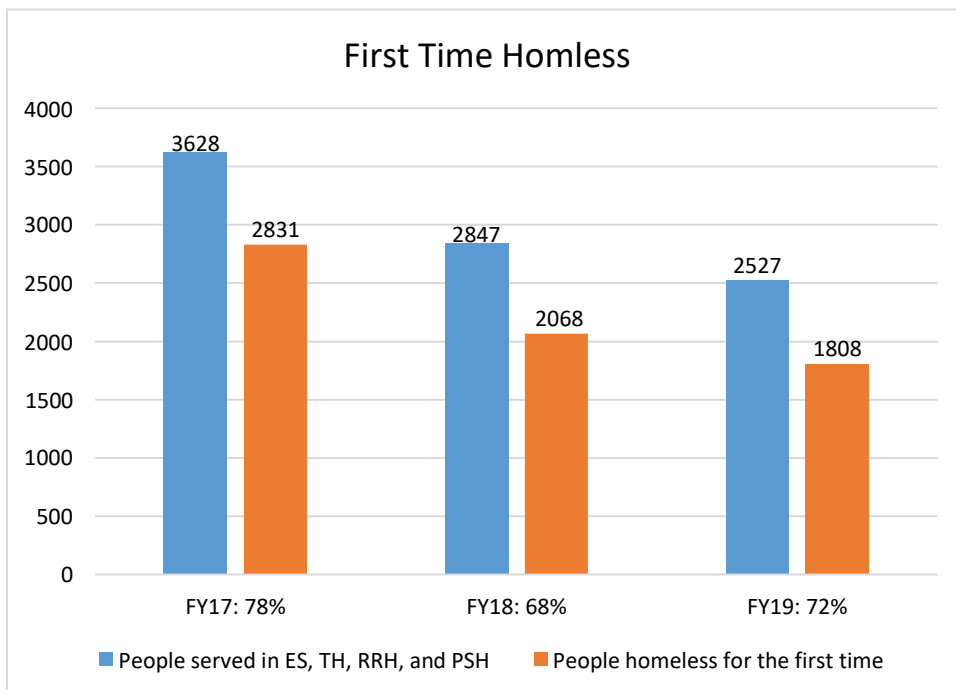
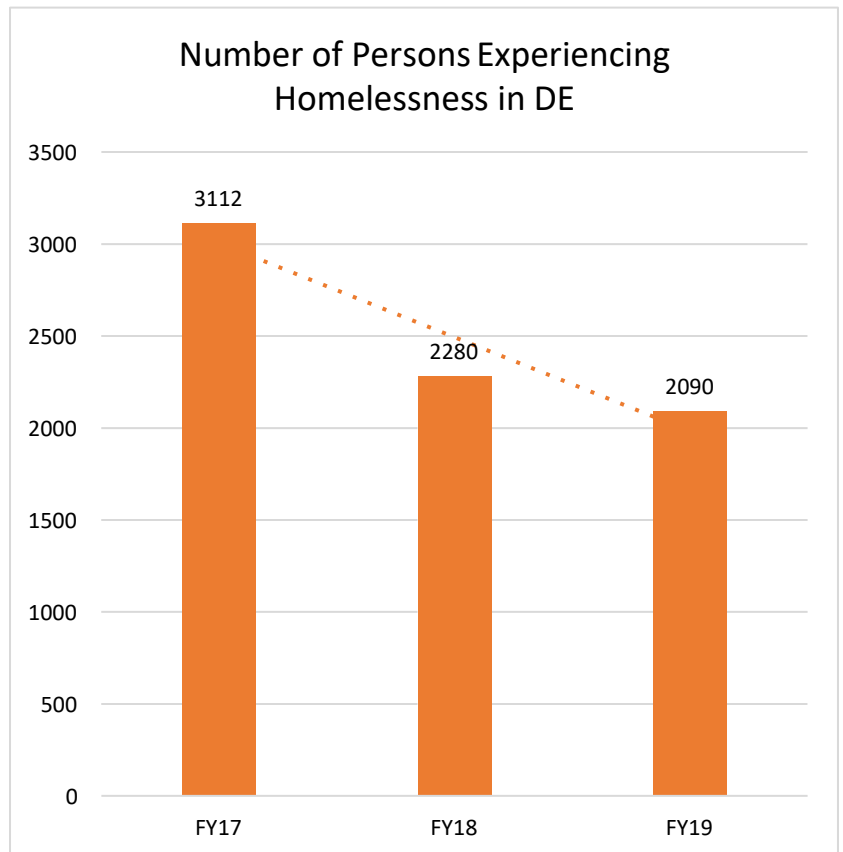
Change in Point-in-Time (PIT) Counts

This measure compares number of sheltered and unsheltered individuals in Delaware’s annual Point in Time (PIT) count. Tracking the PIT count helps our community determine if we are decreasing incidents of homelessness in our community over time. The PIT includes all people sleeping in emergency shelter, transitional housing, and places not meant for human habitation on one given night during the last 10 days of January each year.

Total Number of People who Experience (Sheltered) Homelessness in Delaware

2,090 people were homeless and served by a shelter or transitional housing program from October 2018 – September 2019. This is a decrease of 8.33%.

Since FY18 an emergency shelter project in NCC was partially closed due to renovations. This resulted in a reduction of 164 unduplicated clients served from FY17 to FY18. In addition, a second shelter in NCC was shut down during FY18; the same shelter that added 700 unduplicated clients served to the system in FY17, reduced the system by 700 unduplicated clients served in FY18. The temporary reduction of beds in one shelter and the closing of another, accounts for the total drop in sheltered homelessness in FY18 – FY19.



First Time Homeless

In FY19, 72% of people who experienced homelessness in Delaware were homeless for the first time.

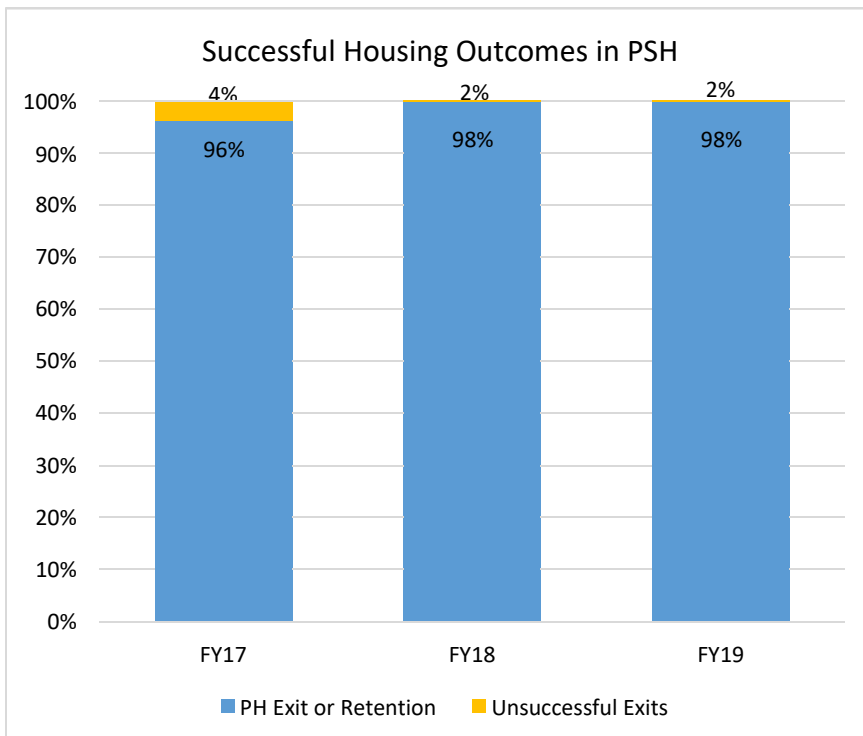
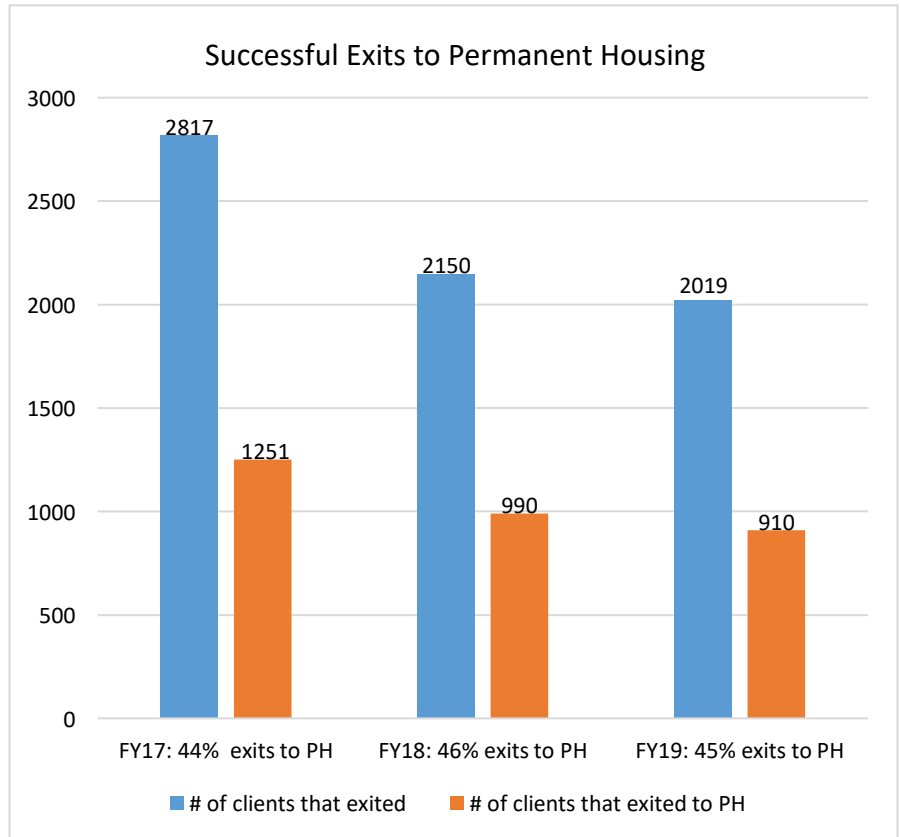
Though 260 less people experienced homelessness for the first time in FY19 than in FY18, the rate of first time homelessness increased by 4%. This is due to a decrease in the overall homeless population in FY19.

Successful Permanent Housing Outcomes (for ES, TH, and RRH Projects)

This measure tells us how effective our community is at helping homeless households access permanent housing.

In FY19, 45% of people (adults and children) served by a homeless assistance project in Delaware moved from homelessness to permanent housing.

The Delaware CoC previously set a goal to increase this performance outcome to 60%. This year, the CoC will continue to implement strategies to increase this performance outcome.



Successful Housing Outcomes in Permanent Supportive Housing

Permanent Supportive Housing (PSH) provides a permanent housing subsidy to people experiencing homelessness who have a disability, including those who are chronically homeless. Additionally, supportive services are provided to each client to help them maintain stable housing.

People who experience chronic homelessness have been homeless on the streets or in emergency shelters for more than 1 year and have a diagnosed disability that makes it hard for them to live independently

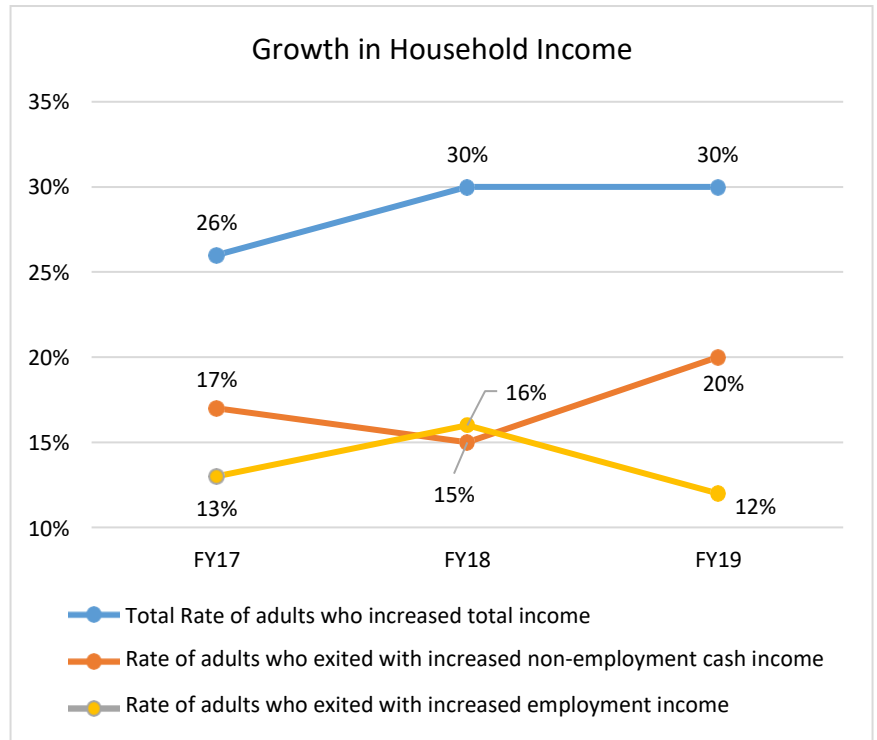
In Delaware, 98% of people served by PSH either remain in PSH or leave for another permanent housing option. This remained the same from FY18 to FY19.

Income Growth in Continuum of Care Funded Projects

This performance measure is only calculated for homeless assistance projects that receive federal CoC funding from the U.S. Department of Housing and Urban Development.

It measures the rate of adults served whose incomes increase from the time they enter a project to the time that they exit the project.

In FY19, 30% of adults served increased their household incomes. This remained the same from FY18 to FY19.



Delaware CoC Performance Standards

2019 HDX Competition Report

PIT Count Data for DE-500 - Delaware Statewide CoC

Total Population PIT Count Data

	2016 PIT	2017 PIT	2018 PIT	2019 PIT
Total Sheltered and Unsheltered Count	1070	994	1082	921
Emergency Shelter Total	621	564	702	606
Safe Haven Total	0	0	5	0
Transitional Housing Total	398	372	282	220
Total Sheltered Count	1019	936	989	826
Total Unsheltered Count	51	58	93	95

Chronically Homeless PIT Counts

	2016 PIT	2017 PIT	2018 PIT	2019 PIT
Total Sheltered and Unsheltered Count of Chronically Homeless Persons	74	127	189	168
Sheltered Count of Chronically Homeless Persons	72	102	170	131
Unsheltered Count of Chronically Homeless Persons	2	25	19	37

2019 HDX Competition Report

PIT Count Data for DE-500 - Delaware Statewide CoC

Homeless Households with Children PIT Counts

	2016 PIT	2017 PIT	2018 PIT	2019 PIT
Total Sheltered and Unsheltered Count of the Number of Homeless Households with Children	108	129	125	118
Sheltered Count of Homeless Households with Children	108	127	125	112
Unsheltered Count of Homeless Households with Children	0	2	0	6

Homeless Veteran PIT Counts

	2011	2016	2017	2018	2019
Total Sheltered and Unsheltered Count of the Number of Homeless Veterans	55	107	91	70	66
Sheltered Count of Homeless Veterans	53	103	85	67	62
Unsheltered Count of Homeless Veterans	2	4	6	3	4

2019 HDX Competition Report
HIC Data for DE-500 - Delaware Statewide CoC

HMIS Bed Coverage Rate				
Project Type	Total Beds in 2019 HIC	Total Beds in 2019 HIC Dedicated for DV	Total Beds in HMIS	HMIS Bed Coverage Rate
Emergency Shelter (ES) Beds	577	73	298	59.13%
Safe Haven (SH) Beds	0	0	0	NA
Transitional Housing (TH) Beds	437	0	188	43.02%
Rapid Re-Housing (RRH) Beds	131	0	131	100.00%
Permanent Supportive Housing (PSH) Beds	1004	0	822	81.87%
Other Permanent Housing (OPH) Beds	0	0	0	NA
Total Beds	2,149	73	1439	69.32%

2019 HDX Competition Report

HIC Data for DE-500 - Delaware Statewide CoC

PSH Beds Dedicated to Persons Experiencing Chronic Homelessness

Chronically Homeless Bed Counts	2016 HIC	2017 HIC	2018 HIC	2019 HIC
Number of CoC Program and non-CoC Program funded PSH beds dedicated for use by chronically homeless persons identified on the HIC	410	471	656	56

Rapid Rehousing (RRH) Units Dedicated to Persons in Household with Children

Households with Children	2016 HIC	2017 HIC	2018 HIC	2019 HIC
RRH units available to serve families on the HIC	39	64	34	28

Rapid Rehousing Beds Dedicated to All Persons

All Household Types	2016 HIC	2017 HIC	2018 HIC	2019 HIC
RRH beds available to serve all populations on the HIC	144	216	155	131

2019 HDX Competition Report

FY2018 - Performance Measurement Module (Sys PM)

Summary Report for DE-500 - Delaware Statewide CoC

Measure 1: Length of Time Persons Remain Homeless

This measure the number of clients active in the report date range across ES, SH (Metric 1.1) and then ES, SH and TH (Metric 1.2) along with their average and median length of time homeless. This includes time homeless during the report date range as well as prior to the report start date, going back no further than October, 1, 2012.

Metric 1.1: Change in the average and median length of time persons are homeless in ES and SH projects.
Metric 1.2: Change in the average and median length of time persons are homeless in ES, SH, and TH projects.

a. This measure is of the client's entry, exit, and bed night dates strictly as entered in the HMIS system.

	Universe (Persons)		Average LOT Homeless (bed nights)		Median LOT Homeless (bed nights)	
	Submitted FY 2017	FY 2018	Submitted FY 2017	FY 2018	Submitted FY 2017	FY 2018
1.1 Persons in ES and SH	2648	2039	52	74	31	50
1.2 Persons in ES, SH, and TH	3038	2241	75	102	39	57
				Difference		Difference
				22		19
				27		18

b. This measure is based on data element 3.17.

This measure includes data from each client's Living Situation (Data Standards element 3.917) response as well as time spent in permanent housing projects between Project Start and Housing Move-In. This information is added to the client's entry date, effectively extending the client's entry date backward in time. This "adjusted entry date" is then used in the calculations just as if it were the client's actual entry date.

The construction of this measure changed, per HUD's specifications, between FY 2016 and FY 2017. HUD is aware that this may impact the change between these two years.

2019 HDX Competition Report FY2018 - Performance Measurement Module (Sys PM)

	Universe (Persons)		Average LOT Homeless (bed nights)		Median LOT Homeless (bed nights)	
	Submitted FY 2017	FY 2018	Submitted FY 2017	FY 2018	Submitted FY 2017	FY 2018
1.1 Persons in ES, SH, and PH (prior to "housing move in")	2699	1950	258	387	73	132
1.2 Persons in ES, SH, TH, and PH (prior to "housing move in")	3114	2123	272	404	79	157
				Difference		Difference
				129		59
				132		78

2019 HDX Competition Report FY2018 - Performance Measurement Module (Sys PM)

Measure 2: The Extent to which Persons who Exit Homelessness to Permanent Housing Destinations Return to Homelessness

This measures clients who exited SO, ES, TH, SH or PH to a permanent housing destination in the date range two years prior to the report date range. Of those clients, the measure reports on how many of them returned to homelessness as indicated in the HMIS for up to two years after their initial exit.

After entering data, please review and confirm your entries and totals. Some HMIS reports may not list the project types in exactly the same order as they are displayed below.

	Total # of Persons who Exited to a Permanent Housing Destination (2 Years Prior)	Returns to Homelessness in Less than 6 Months		Returns to Homelessness from 6 to 12 Months		Returns to Homelessness from 13 to 24 Months		Number of Returns in 2 Years	
		FY 2018	% of Returns	FY 2018	% of Returns	FY 2018	% of Returns	FY 2018	% of Returns
Exit was from SO	42	6	14%	4	10%	2	5%	12	29%
Exit was from ES	623	99	16%	47	8%	38	6%	184	30%
Exit was from TH	102	13	13%	13	13%	7	7%	33	32%
Exit was from SH	0	0		0		0		0	
Exit was from PH	650	29	4%	32	5%	39	6%	100	15%
TOTAL Returns to Homelessness	1417	147	10%	96	7%	86	6%	329	23%

Measure 3: Number of Homeless Persons

Metric 3.1 – Change in PIT Counts

2019 HDX Competition Report

FY2018 - Performance Measurement Module (Sys PM)

This measures the change in PIT counts of sheltered and unsheltered homeless person as reported on the PIT (not from HMIS).

	January 2017 PIT Count	January 2018 PIT Count	Difference
Universe: Total PIT Count of sheltered and unsheltered persons	994	1082	88
Emergency Shelter Total	564	702	138
Safe Haven Total	0	5	5
Transitional Housing Total	372	282	-90
Total Sheltered Count	936	989	53
Unsheltered Count	58	93	35

Metric 3.2 – Change in Annual Counts

This measures the change in annual counts of sheltered homeless persons in HMIS.

	Submitted FY 2017	FY 2018	Difference
Universe: Unduplicated Total sheltered homeless persons	3112	2280	-832
Emergency Shelter Total	2678	2048	-630
Safe Haven Total	0	0	0
Transitional Housing Total	545	308	-237

2019 HDX Competition Report FY2018 - Performance Measurement Module (Sys PM)

Measure 4: Employment and Income Growth for Homeless Persons in CoC Program-funded Projects

Metric 4.1 – Change in earned income for adult system stayers during the reporting period

	Submitted FY 2017	FY 2018	Difference
Universe: Number of adults (system stayers)	272	423	151
Number of adults with increased earned income	21	57	36
Percentage of adults who increased earned income	8%	13%	5%

Metric 4.2 – Change in non-employment cash income for adult system stayers during the reporting period

	Submitted FY 2017	FY 2018	Difference
Universe: Number of adults (system stayers)	272	423	151
Number of adults with increased non-employment cash income	89	119	30
Percentage of adults who increased non-employment cash income	33%	28%	-5%

Metric 4.3 – Change in total income for adult system stayers during the reporting period

	Submitted FY 2017	FY 2018	Difference
Universe: Number of adults (system stayers)	272	423	151
Number of adults with increased total income	107	139	32
Percentage of adults who increased total income	39%	33%	-6%

2019 HDX Competition Report FY2018 - Performance Measurement Module (Sys PM)

Metric 4.4 – Change in earned income for adult system leavers

	Submitted FY 2017	FY 2018	Difference
Universe: Number of adults who exited (system leavers)	205	116	-89
Number of adults who exited with increased earned income	26	19	-7
Percentage of adults who increased earned income	13%	16%	3%

Metric 4.5 – Change in non-employment cash income for adult system leavers

	Submitted FY 2017	FY 2018	Difference
Universe: Number of adults who exited (system leavers)	205	116	-89
Number of adults who exited with increased non-employment cash income	34	17	-17
Percentage of adults who increased non-employment cash income	17%	15%	-2%

Metric 4.6 – Change in total income for adult system leavers

	Submitted FY 2017	FY 2018	Difference
Universe: Number of adults who exited (system leavers)	205	116	-89
Number of adults who exited with increased total income	53	35	-18
Percentage of adults who increased total income	26%	30%	4%

2019 HDX Competition Report FY2018 - Performance Measurement Module (Sys PM)

Measure 5: Number of persons who become homeless for the 1st time

Metric 5.1 – Change in the number of persons entering ES, SH, and TH projects with no prior enrollments in HMIS

	Submitted FY 2017	FY 2018	Difference
Universe: Person with entries into ES, SH or TH during the reporting period.	2831	2068	-763
Of persons above, count those who were in ES, SH, TH or any PH within 24 months prior to their entry during the reporting year.	548	679	131
Of persons above, count those who did not have entries in ES, SH, TH or PH in the previous 24 months. (i.e. Number of persons experiencing homelessness for the first time)	2283	1389	-894

Metric 5.2 – Change in the number of persons entering ES, SH, TH, and PH projects with no prior enrollments in HMIS

	Submitted FY 2017	FY 2018	Difference
Universe: Person with entries into ES, SH, TH or PH during the reporting period.	3628	2847	-781
Of persons above, count those who were in ES, SH, TH or any PH within 24 months prior to their entry during the reporting year.	792	913	121
Of persons above, count those who did not have entries in ES, SH, TH or PH in the previous 24 months. (i.e. Number of persons experiencing homelessness for the first time.)	2836	1934	-902

2019 HDX Competition Report
FY2018 - Performance Measurement Module (Sys PM)

Measure 6: Homeless Prevention and Housing Placement of Persons defined by category 3 of HUD’s Homeless Definition in CoC Program-funded Projects

This Measure is not applicable to CoCs in FY2018 (Oct 1, 2017 - Sept 30, 2018) reporting period.

Measure 7: Successful Placement from Street Outreach and Successful Placement in or Retention of Permanent Housing

Metric 7a.1 – Change in exits to permanent housing destinations

	Submitted FY 2017	FY 2018	Difference
Universe: Persons who exit Street Outreach	47	89	42
Of persons above, those who exited to temporary & some institutional destinations	11	14	3
Of the persons above, those who exited to permanent housing destinations	25	58	33
% Successful exits	77%	81%	4%

Metric 7b.1 – Change in exits to permanent housing destinations

2019 HDX Competition Report
FY2018 - Performance Measurement Module (Sys PM)

	Submitted FY 2017	FY 2018	Difference
Universe: Persons in ES, SH, TH and PH-RRH who exited, plus persons in other PH projects who exited without moving into housing	3036	2150	-886
Of the persons above, those who exited to permanent housing destinations	1250	990	-260
% Successful exits	41%	46%	5%

Metric 7b.2 – Change in exit to or retention of permanent housing

	Submitted FY 2017	FY 2018	Difference
Universe: Persons in all PH projects except PH-RRH	755	776	21
Of persons above, those who remained in applicable PH projects and those who exited to permanent housing destinations	726	758	32
% Successful exits/retention	96%	98%	2%

**2019 HDX Competition Report
FY2018 - SysPM Data Quality
DE-500 - Delaware Statewide CoC**

This is a new tab for FY 2016 submissions only. Submission must be performed manually (data cannot be uploaded). Data coverage and quality will allow HUD to better interpret your Sys PM submissions.

Your bed coverage data has been imported from the HIC module. The remainder of the data quality points should be pulled from data quality reports made available by your vendor according to the specifications provided in the HMIS Standard Reporting Terminology Glossary. You may need to run multiple reports into order to get data for each combination of year and project type.

You may enter a note about any field if you wish to provide an explanation about your data quality results. This is not required.

2019 HDX Competition Report FY2018 - SysPM Data Quality

	All ES, SH				All TH				All PSH, OPH				All RRH				All Street Outreach			
	2014-2015	2015-2016	2016-2017	2017-2018	2014-2015	2015-2016	2016-2017	2017-2018	2014-2015	2015-2016	2016-2017	2017-2018	2014-2015	2015-2016	2016-2017	2017-2018	2014-2015	2015-2016	2016-2017	2017-2018
1. Number of non-DV Beds on HIC	510	477	499	558	580	568	485	727	666	772	942	176	144	216	155					
2. Number of HMIS Beds	288	345	374	426	356	275	168	546	520	593	775	176	144	216	155					
3. HMIS Participation Rate from HIC (%)	56.47	72.33	74.95	76.34	61.38	48.42	34.64	75.10	78.08	76.81	82.27	100.00	100.00	100.00	100.00					
4. Unduplicated Persons Served (HMIS)	1956	1954	2547	2374	521	518	311	590	592	831	950	651	959	1411	1299	241	122	92	47	
5. Total Leavers (HMIS)	1694	1689	2252	2063	361	320	192	126	130	136	117	491	676	1032	760	17	21	0	1	
6. Destination of Don't Know, Refused, or Missing (HMIS)	439	387	301	603	22	44	18	3	1	7	4	25	71	72	5	1	4	0	0	
7. Destination Error Rate (%)	25.91	22.91	13.37	29.23	6.09	13.75	9.38	2.38	0.77	5.15	3.42	5.09	10.50	6.98	0.66	5.88	19.05		0.00	

2019 HDX Competition Report

Submission and Count Dates for DE-500 - Delaware Statewide CoC

Date of PIT Count

	Date	Received HUD Waiver
Date CoC Conducted 2019 PIT Count	1/30/2019	

Report Submission Date in HDX

	Submitted On	Met Deadline
2019 PIT Count Submittal Date	5/1/2019	No
2019 HIC Count Submittal Date	4/30/2019	Yes
2018 System PM Submittal Date	5/29/2019	Yes

HOPWA Policies and Procedures

Housing Opportunities for People with AIDS (HOPWA)

Reference 91.220(l)(3)

HOUSING OPPORTUNITIES FOR PERSONS WITH AIDS

The Housing Opportunities for Persons with AIDS (**HOPWA**) program, managed by HUD's Office of HIV/AIDS Housing, was established to provide housing assistance and related supportive services for low-income persons living with HIV/AIDS and their families.

The conditions in which people with HIV live, work, learn, and play contribute to their ability to live healthy lives. With safe, decent, and affordable housing, people with HIV are better able to access comprehensive health care and supportive services, get on HIV treatment, take their HIV medication consistently, and see their health care provider regularly. However, individuals with HIV who are homeless or lack stable housing are more likely to delay HIV care, have poorer access to regular care, and are less likely to adhere to their HIV treatment.

Throughout many communities, people with HIV risk losing their housing due to factors such as increased medical costs and limited incomes or reduced ability to keep working due to related illnesses. Securing stable housing is a key part of achieving successful HIV outcomes.

In the City, we realize the need to address this issue and to that end, we have funded the following organizations:

Delaware HIV (DH)

Catholic Charities (CC)

Ministry of Caring House of Joseph (HoJ)

Cecil County Health Department (CC)

Identify the method of selecting project sponsors and describe the one-year goals for HOPWA funded projects:

The City of Wilmington has a competitive RFP process to select project sponsors for HOPWA funds. The selection process was open to all qualified agencies including grassroots faith-based organizations as well as other community organizations.

Discussion

Programs funded through the HOPWA Program are housing related and designed to provide affordable housing for low-income persons living with HIV/AIDS and their families; enable low income persons living with HIV/AIDS and their families to become housed; and to provide services needed to enable low-income HIV/AIDS clients to remain housed, locate housing and prevent homelessness.