

2021

**2021 CAPER**

**(Oct. 1, 2021 – Sept. 30, 2022)**

**City of West Palm Beach**

**401Clematis Street**

**West Palm Beach, FL 33401**

Consolidated Annual Performance Evaluation Report

Table of Contents

[Executive Summary 3](#_Toc121732683)

[CR-05 - Goals and Outcomes 5](#_Toc121732684)

[CR-10 - Racial and Ethnic composition of families assisted 10](#_Toc121732685)

[CR-15 - Resources and Investments 91.520(a) 12](#_Toc121732686)

[CR-20 - Affordable Housing 91.520(b) 17](#_Toc121732687)

[CR-25 - Homeless and Other Special Needs 91.220(d, e); 91.320(d, e); 91.520(c) 21](#_Toc121732688)

[CR-30 - Public Housing 91.220(h); 91.320(j) 26](#_Toc121732689)

[CR-35 - Other Actions 91.220(j)-(k); 91.320(i)-(j) 27](#_Toc121732690)

[CR-40 - Monitoring 91.220 and 91.230 32](#_Toc121732691)

[CR-45 - CDBG 91.520(c) 34](#_Toc121732692)

[CR-50 - HOME 91.520(d) 35](#_Toc121732693)

[CR-55 - HOPWA 91.520(e) 38](#_Toc121732694)

[CR-58 – Section 3 39](#_Toc121732695)

## Executive Summary

The mission of the City of West Palm Beach Department of Housing and Community Development (HCD) is to improve the quality of life for its residents through the development of housing, social, and economic opportunities. The Department is committed to high standards of customer service in the administration and delivery of programs that are collaborative, innovative, and sustainable.

Creating opportunities that will support and empower low-income households and neighborhoods requires a multifaceted and comprehensive approach. The City of West Palm Beach has determined that in order to maximize the production of affordable housing units, create economic development opportunities, and provide services to its residents, it must commit to a variety of public/private initiatives. In addition, the City plans to work toward integrative goals that focus on leveraging strategies both internally and across multiple City departments.

As an entitlement community receiving U.S. Department of Housing and Urban Development (HUD) formula program funds, the City of West Palm Beach is required to submit a Five Year Consolidated Plan that serves as the planning tool outlining the jurisdiction’s housing and community development needs. The Consolidated Plan is carried out through Annual Action Plans which provide a concise summary of the actions, activities, and specific federal and non-federal resources that will be used each year to develop strong, sustainable, and inclusive communities. The Annual Action Plan is developed under HUD guidelines and serves as the City’s application for the following entitlement grants:

* Community Development Block Grant (CDBG) Program;
* HOME Investment Partnerships (HOME) Program; and
* Housing Opportunities for Persons with AIDS (HOPWA) Program.

At the end of each Program Year (PY), the City must prepare a Consolidated Annual Performance and Evaluation Report (CAPER). This report must be submitted to HUD within 90 days after the close of the program year and includes information on the programmatic accomplishments under the various grant programs. The CAPER also contains information relevant to the households assisted (including income, racial, and ethnic composition), actions taken to further fair housing, and how the jurisdiction’s actions and performance align with the City’s overall strategic plan. This year’s CAPER also discusses accomplishments funded by the City through supplemental funding received in PY 2020 under the Coronavirus Aid, Relief and Economic Security Act (CARES Act) to prepare for, prevent, and respond to the Coronavirus (COVID-19 as well as accomplishments for the State Housing Initiatives Partnership (SHIP) Program funded by the State of Florida.

The City of West Palm Beach engaged in strategic planning efforts to direct the use of City resources to address priorities established by residents and community leaders. As a result, the City adopted its Strategic Plan which provided the community with a clear vision of where West Palm Beach is headed and policy direction for City administrators and staff. In PY 2021 (October 1, 2021 – September 30, 2022), through federal, state, and local funding, the City accomplished projects that supported housing and community development initiatives outlined in the City’s Strategic Plan as well as the 2020-2024 Consolidated Plan and the 2021-2022 Annual Action Plan.

## CR-05 - Goals and Outcomes

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

The City of West Palm Beach undertook the projects and activities outlined in the Consolidated Plan and 2021-2022 Annual Action Plan to achieve the overall goal of providing decent housing, creating a suitable living environment, and expanding economic development opportunities principally for low- and moderate-income persons. With the entitlement funds received annually as well as the supplemental CARES Act funding received through the CDBG-CV and HOPWA-CV programs, during the reporting period, the City carried out the following initiatives:

**CDBG**

* Continued the construction of the Eva W. Mack Community Hub, the new location for the HCD Community Resources Division and the Sickle Cell Foundation of Palm Beach County, expected to be completed in December 2022. ($1,745,239 expended)
* Provided utility assistance to low-income senior citizens through the Serving our Seniors (SOS) Program. ($1,507 expended; 4 households assisted)
* Provided financial support to Mental Health America of Palm Beach County to provide clinical services to homeless individuals and connect persons experiencing homelessness to community resources and housing. ($20,449 expended, 24 persons assisted)

**CDBG-CV**

* Supported the provision of health care services through the FAU Christine E. Lynn College of Nursing Community Health Center at U.B. Kinsey Educational & Community Center to prevent, prepare for, and respond to COVID-19. ($23,333 expended; 1,399 persons assisted)
* Provided financial support to Esperanza Community Center to hire a community health outreach worker responsible for providing COVID-19 related health services and education, personal protective equipment, and referrals to community resources. ($24,280 expended; 310 persons assisted)

**HOPWA**

* Provided tenant-based rental assistance and supportive services to individuals and families living with HIV/AIDS through a program administered by the Palm Beach County Housing Authority. ($2,899,469 expended; 226 households assisted)

**HOPWA-CV**

* Provided short-term rent/ mortgage/ utility assistance, supportive services, permanent housing placement, and hotel/motel leasing to individuals living with HIV/AIDS and impacted by COVID-19. ($182,743 expended; \_\_ households assisted)

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

| **Goal** | **Source** | **Indicator** | **Expected 5Yr**  **Strategic Plan** | **Actual 5Yr**  **Strategic Plan** | **Expected Program Year**  **2021** | **Actual Program Year**  **2021** | **Percent Complete Program Year 2021** |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Affordable Housing | HOME | Homeowner Housing Added | 0 | 7 | 2 | 0 | 0.00% |
| Affordable Housing | HOME | Direct Financial Assistance to Homebuyers | 20 | 7 | 5 | 0 | 0.00% |
| Affordable Housing | HOPWA | Tenant-based rental assistance / Rapid Rehousing | 1250 | 462 | 250 | 226 | 90.00% |
| Affordable Housing | HOPWA | Other | 1250 | 407 | 250 | 199 | 80.00% |
| Economic Development | CDBG | Jobs created/ retained | 200 | 0 | 0 | 0 | 0.00% |
| Homelessness Assistance and Public Services | CDBG | Public service activities other than Low/Moderate Income Housing Benefit | 125 | 345 | 160 | 28 | 17.50% |
| Homelessness Assistance and Public Services | HOME | Tenant-based rental assistance / Rapid Rehousing | 35 | 0 | 0 | 0 | 0.00% |
| Infrastructure and Public Facilities | CDBG | Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit | 1000 | 1945 | 1000 | 0 | 0.00% |

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

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

The City’s 2020-2024 Consolidated Plan and 2021 Annual Action Plan contained the priorities for the City’s use of federal, state, and local housing funds. During PY 2021, the City continued to address the highest priority needs (affordable housing, infrastructure, homelessness and public services, economic development) within the city, principally for low- and moderate- income persons. From October 1, 2021, through September 30, 2022, the City accomplished the activities previously mentioned through federal, state and local funding made available for housing and community development projects and programs. In addition to delivery of services and programs, the City continued its goal to diligently to comply with the objectives of the formula programs.

**Housing**

To maintain economic and social vibrancy in the City of West Palm Beach, it is important for the City to provide an attainable supply of housing at all income levels. To achieve that goal, the City established programs to provide assistance for homeownership for low income persons and for persons with special needs. These programs include the home purchase assistance program, new construction of affordable housing, and the HOPWA program.

The City continued to leverage federal and state funding for affordable housing with its local Housing Trust Fund that is used to provide development loans to developers. The City maintains a list of City owned properties, as required by Florida Statute 166.0451, that are appropriate for use as affordable housing. During PY 2021, one property was sold which generated $134,500 in proceeds for the City’s local Housing Trust Fund. The City also donates surplus land to local nonprofits for the development of affordable housing. The local Housing Trust Fund funds the Mayor’s “600 in 3” Initiative, announced in January 2020, which aims to complete the development of 600 affordable housing units in less than three years. At the end of PY 2021, the City had 600 units completed or underway and anticipates that the goal will be surpassed at the end of the calendar year.

In August 2021, the City Commission approved the creation of the Downtown Master Plan (DMP) Housing Incentive Program for the purpose of promoting the construction of residential units for families earning between 60% and 100% of the area median income within the Downtown. The program offers additional development capacity through the transfer of development rights program within the downtown and surrounding areas. During PY 2021, the City developed implementing guidelines for the DMP Housing Incentive Program and continued to explore policy actions to increase the supply of affordable housing. This includes the creation of standards for the review of residential projects subject to Section 166.04151, Florida Statutes, providing for the development of affordable housing on parcel zoned for residential, commercial, or industrial use.

**Social Services**

During PY 2021, the City continued its efforts to strengthen the coordination of social services between government and nonprofit agencies. This was accomplished by providing CDBG funds to a social service provider, Mental Health America (MHA), and through the operation of the City’s Serving Our Seniors (S.O.S) Program. MHA focused on the provision of services to support outreach and prevention efforts directed toward homeless persons including the following: homeless persons with special needs; seniors; veterans; and families with children. The City continued to provide funding, direct services, and programs for the homeless including the following: permanent housing; supportive housing; rapid rehousing; food assistance; relocation assistance; assessments; referral services; and job placement assistance through its Vickers House Community Center. In addition, Vickers House, through the S.O.S. Program, provided temporary assistance for the critical needs of low-income elderly, City residents. The City will continue to contribute to helping homeless persons make the transition to permanent housing and independent living by providing funds that serve these populations and by expanding affordable housing options. The City also collaborated with the local Continuum of Care and Ryan White service providers to ensure that individuals who are homeless or in danger of being homeless are able to access HOPWA housing assistance.

The City was the recipient of funding under the Coronavirus Aid, Relief and Economic Security Act (CARES Act) to prevent the spread of COVID-19 and to facilitate assistance to eligible communities and households economically impacted by the pandemic. During the 2020 program year, HCD partnered with the City’s Fire Department to provide COVID-19 vaccines and other health support to low-income residents. The focus of the COVID-19 Vaccine Program was to administer mobile vaccinations, paramedic support, and education and outreach to eligible residents residing in census tracts where 51% or more of the residents are low- and moderate-income. The City also used the CDBG-CV grant to support the COVID-19 Summer Feeding Program. During the 2021 program year, the City awarded funds to two subrecipients for the provision of health services: FAU Community Health Center and Esperanza Community Center.

The City also received a supplemental award of HOPWA funding under the CARES Act referred to as HOPWA-CV. The HOPWA-CV funding was subawarded to Palm Beach County (Community Services Department) for various eligible activities including the provision of supportive services, permanent housing placement, leasing hotels/motels to quarantine HOPWA eligible persons or their household members, and the payment of short-term rent, mortgage, and utility payments for up to 24 months.

**Non-Housing Community Development**

The City currently has one public facility under construction that is expected to be completed by the December 2022. The new public facility, the Eva W. Mack Community Hub, is a 5,422 square foot building located at 1540 N. Australian Avenue in West Palm Beach. This public facility will serve low- and moderate-income individuals, families, elderly, disabled, and homeless individuals.

## CR-10 - Racial and Ethnic composition of families assisted

**Describe the families assisted (including the racial and ethnic status of families assisted). 91.520(a)**

|  |  |  |  |
| --- | --- | --- | --- |
|  | **CDBG** | **HOME** | **HOPWA** |
| White | 9 | 0 | 33 |
| Black or African American | 19 | 0 | 193 |
| Asian | 0 | 0 | 0 |
| American Indian or American Native | 0 | 0 | 0 |
| Native Hawaiian or Other Pacific Islander | 0 | 0 | 0 |
| **Total** | 28 | 0 | 226 |

|  |  |  |  |
| --- | --- | --- | --- |
|  |  |  |  |
| Hispanic | 2 | 0 | 28 |
| Not Hispanic | 26 | 0 | 198 |

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

**Narrative**

The City of West Palm Beach prioritizes needs and offers services and programs to eligible households regardless of race or ethnicity. Entitlement funds were distributed amongst low- and moderate-income persons and households and in areas located in qualified census tracts.

This CAPER, as required by HUD, utilizes data from Integrated Disbursement and Information System (IDIS) to assess how housing and community development program funds were used to serve the beneficiaries of HUD funded programs.

The table above depicts the data from activities completed or underway during PY 2021. These activities include CDBG public service activities (Serving Our Seniors Program and Mental Health America) and the HOPWA Tenant Based Rental Assistance program operated by the Palm Beach County Housing Authority (PBCHA).

Not reflected in the table is data for individuals and families assisted through HCD-administered funding received under the Coronavirus Aid, Relief and Economic Security Act (CARES Act). During PY 2020, the City was the recipient of funding under the CARES Act to prevent the spread of COVID-19 and to facilitate assistance to eligible communities and households economically impacted by the pandemic. For the 2020 program year, HCD in partnership with the City’s Fire Department utilized the supplemental CDBG funding (CDBG-CV) to provide COVID-19 vaccines and other health support to low-income residents. The City also used the CDBG-CV grant to support the COVID-19 Summer Feeding Program providing nutritious meals for lunch and snacks for children participating in the CityFun Summer Camp. Combined, these two programs served a total of 3,930 persons.

During PY 2021, CDBG-CV funds were awarded to two subrecipients to provide health services to prevent the spread of COVID-19 through education, vaccination, distribution of PPE, and other outreach efforts. The FAU Christine E. Lynn College of Nursing Community Health Center at U.B. Kinsey Educational & Community Center assisted 1,399 persons during the reporting period. Esperanza Community Center severed 310 unduplicated persons between March through August 2022. The table below reports on the beneficiaries served by these two agencies.

|  |  |  |
| --- | --- | --- |
|  | **CDBG-CV** | **HOPWA-CV** |
| White | 410 |  |
| Black or African American | 110 |  |
| Asian | 3 |  |
| American Indian or American Native | 0 |  |
| Native Hawaiian or Other Pacific Islander | 0 |  |
| Multi-Racial | 1,185 |  |
| **Total** | **1,709** |  |
| Hispanic | 506 |  |
| Not Hispanic | 1,203 |  |

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

**Identify the resources made available**

|  |  |  |  |
| --- | --- | --- | --- |
| **Source of Funds** | **Source** | **Resources Made Available** | **Amount Expended During Program Year** |
| CDBG | public - federal | 1,023,448 | 1,971,886 |
| HOME | public - federal | 478,968 | 64,896 |
| HOPWA | public - federal | 3,202,608 | 2,974,333 |

Table 3 - Resources Made Available

**Narrative**

In PY 2021, the City of West Palm Beach received annual entitlement funds from CDBG, HOME, and HOPWA federal grant programs. The table above details the resources made available and amounts expended during the program year. Funds expended during the program year include administrative amounts, reprogrammed prior year funds, funds awarded to activities in prior program years that were not spent, and funds received through program income. As such, program expenditures may differ from award amounts.

In response to the COVID-19 pandemic, the City also received Coronavirus Aid, Relief, and Economic Security Act (CARES Act) funding and a summary of the uses are described below.

CARES Act Funds

*CDBG-CV*: In PY 2020, the CARES Act funding allocation for CDBG-CV was awarded in two rounds for CDBG-CV and CDBG-CV(3), which were $597,108 and $987,542, respectively, totaling $1,584,650. In response to the COVID-19 pandemic, in PY19, PY20, and PY21, the City expended a total of $660,027 on public services and administrative costs. The remaining balance of CDBG-CV funding totals $924,663.

*HOPWA-CV*: In PY 2020, the CARES Act funding allocation for HOPWA-CV was $467,782. The City has expended a total of $319,275 in PY19, PY20, and PY21, leaving a remaining balance of $148,507 available. The supplemental funds provided under the CARES Act are being used to maintain operations, rental assistance, supportive services, administrative costs, and other necessary actions to assist individuals living with HIV/AIDS and their families.

American Rescue Plan Act Funds

In PY 2021, $1,734,257 funding was made available through the American Rescue Plan Act (ARPA). The City is currently in the planning phase for this funding, which will be reported in the PY22 CAPER.

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

|  |  |  |  |
| --- | --- | --- | --- |
| **Target Area** | **Planned Percentage of Allocation** | **Actual Percentage of Allocation** | **Narrative Description** |
|  |  |  |  |

Table 4 – Identify the geographic distribution and location of investments

**Narrative**

The City did not identify any target areas in its Consolidated Plan. The needs identified within the City are located throughout the community, and no specific geographic areas are identified as a priority for the purpose of allocating funds for housing, public facilities, or public services. There are low-income areas in West Palm Beach consisting of more than 51% low- to moderate- income residents. While there is no specific geographic priority proposed these areas are all served through citywide housing and community development programs.

**Leveraging**

**Explain how federal funds leveraged additional resources (private, state and local funds), including a description of how matching requirements were satisfied, as well as how any publicly owned land or property located within the jurisdiction that were used to address the needs identified in the plan.**

The City of West Palm Beach realizes that HUD funds alone are not enough to address the increasing demand for creating affordable housing and expanding community development assets. The City leveraged its HUD funding to the maximum extent possible using a combination of state, local, and private sector resources.

The City received State Housing Initiative Program (SHIP) funds in PY 2021 in the amount of $771,999 and expended $186,931 on HOME-eligible projects. SHIP funding may be used for single family and multi-family acquisition, rehabilitation, new construction, down payment/mortgage assistance programs, security and utility deposits for the purpose of homelessness prevention, and foreclosure prevention.

In addition to leveraging financial resources, the Department of Housing and Community Development maintains a list of City owned properties that are appropriate for use as affordable housing. No properties were donated during the program year. One property was sold which generated $134,500 in proceeds for the City’s local Housing Trust Fund. The City continues to leverage its local Housing Trust Fund for the development of affordable and workforce housing units.

Additional leverage using CDBG public assistance set-aside through the City’s Community Services/Vickers House programs, which provides community services to youth and special needs populations that is primarily funded through local funds. The City also leverages housing, community development, economic development and social service projects and programs with the City’s Community Redevelopment Agency (CRA), for-profit and non-profit developers, other local government agencies, and social service providers.

In PY21, the 25% HOME Match was reduced by HUD (to 12.5% for fiscal distress). This match requirement is however, superseded by the HUD waiver and suspension of the HOME program match requirements in response to the COVID-19 pandemic. As described in the “Additional Revision, and Extension of December 2020 and April 2020 Memorandum- Availability of Waivers and Suspensions of the HOME Program Requirements in Response to COVID -19 Pandemic” memorandum, effective September 30 2021, the waiver to reduce the HOME match requirement by 100 percent for fiscal years 2020 and 2021 is extended to 2022.

| **Fiscal Year Summary – HOME Match** | |
| --- | --- |
| 1. Excess match from prior Federal fiscal year | $1,350,212 |
| 2. Match contributed during current Federal fiscal year | $321,431 |
| 3 .Total match available for current Federal fiscal year (Line 1 plus Line 2) | $1,671,643 |
| 4. Match liability for current Federal fiscal year | $0 |
| 5. Excess match carried over to next Federal fiscal year (Line 3 minus Line 4) | $1,671,643 |

Table 5 – Fiscal Year Summary - HOME Match Report

| **Match Contribution for the Federal Fiscal Year** | | | | | | | | |
| --- | --- | --- | --- | --- | --- | --- | --- | --- |
| **Project No. or Other ID** | **Date of Contribution** | **Cash**  **(non-Federal sources)** | **Foregone Taxes, Fees, Charges** | **Appraised Land/Real Property** | **Required Infrastructure** | **Site Preparation, Construction Materials, Donated labor** | **Bond Financing** | **Total Match** |
| Housing Trust Fund - 3506 Westview Ave | 3/23/2022 | 134,500 |  |  |  |  |  | 134,500 |
| Community Partners SF Rehab | 5/26/2022 | 186,931 |  |  |  |  |  | 186,931 |

Table 6 – Match Contribution for the Federal Fiscal Year

**HOME MBE/WBE report**

| **Program Income** – Enter the program amounts for the reporting period | | | | |
| --- | --- | --- | --- | --- |
| **Balance on hand at beginning of reporting period**  **$** | **Amount received during reporting period**  **$** | **Total amount expended during reporting period**  **$** | **Amount expended for TBRA**  **$** | **Balance on hand at end of reporting period**  **$** |
| 130,244 | 42,844 | 0 | 0 | 173,088 |

Table 7 – Program Income

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

|  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- |
|  | **Total** | **Minority Business Enterprises** | | | | **White Non-Hispanic** |
| **Alaskan Native or American Indian** | **Asian or Pacific Islander** | **Black Non-Hispanic** | **Hispanic** |

|  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- |
| **Contracts** | | | | | | |
|  |  |  |  |  |  |  |
| Number | 0 |  |  |  |  |  |
| Dollar Amount | 0 |  |  |  |  |  |

|  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- |
| **Sub-Contracts** | | | | | | |
|  |  |  |  |  |  |  |
| Number | 0 |  |  |  |  |  |
| Dollar Amount | 0 |  |  |  |  |  |

|  |  |  |  |
| --- | --- | --- | --- |
|  | **Total** | **Women Business Enterprises** | **Male** |

|  |  |  |  |
| --- | --- | --- | --- |
| **Contracts** | | | |
|  |  |  |  |
| Number | 0 |  |  |
| Dollar Amount | 0 |  |  |

|  |  |  |  |
| --- | --- | --- | --- |
| Sub-Contracts | | | |
|  |  |  |  |
| Number | 0 |  |  |
| Dollar Amount | 0 |  |  |

Table 8 - Minority Business and Women Business Enterprises

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

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

Table 9 – Minority Owners of Rental Property

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

|  |  |  |
| --- | --- | --- |
|  | **Number** | **Cost** |
| Parcels Acquired |  |  |
| Businesses Displaced |  |  |
| Nonprofit Organizations Displaced |  |  |
| Households Temporarily Relocated, not Displaced |  |  |

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

Table 10 – Relocation and Real Property Acquisition

## CR-20 - Affordable Housing 91.520(b)

**Evaluation of the jurisdiction's progress in providing affordable housing, including the number and types of families served, the number of extremely low-income, low-income, moderate-income, and middle-income persons served.**

|  | One-Year Goal | Actual |
| --- | --- | --- |
| Number of Homeless households to be provided affordable housing units | 0 | 0 |
| Number of Non-Homeless households to be provided affordable housing units | 7 | 0 |
| Number of Special-Needs households to be provided affordable housing units | 250 | 226 |
| **Total** | **257** | **226** |

Table 11 – Number of Households

|  | One-Year Goal | Actual |
| --- | --- | --- |
| Number of households supported through Rental Assistance | 250 | 226 |
| Number of households supported through The Production of New Units | 2 | 0 |
| Number of households supported through Rehab of Existing Units | 0 | 0 |
| Number of households supported through Acquisition of Existing Units | 5 | 0 |
| **Total** | **257** | **226** |

Table 12 – Number of Households Supported

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

For PY 2021, the City planned to provide affordable housing to 257 households utilizing HOME and HOPWA funding. The City successfully assisted 226 households with rental assistance through the PBCHA-operated Tenant Based Rental Assistance program which is funded with HOPWA dollars. The City’s project sponsor, Palm Beach County Housing Authority, identified the shortage of affordable rental units and a fair market rent standard that is significantly lower than market rate rent as a continued challenge for low-income renters. These challenges put individuals living with HIV/AIDS and other households with special needs at a greater risk of homelessness. Additional details on the HOPWA program are included in the stand-alone HOPWA CAPER.

The City planned to construct two (2) homeownership units and to provide down payment assistance to five (5) households using HOME funding. These housing production and acquisition goals were not realized as a result of the surge in sales prices for homeownership units, limited down payment assistance resources, and investor competition. The City focused its housing efforts on increasing the supply of rental housing units due to the high rental rates that residents are facing.

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

Although the City made sufficient progress towards its PY 2021 affordable housing goals, adjustments and improvements will be made to housing strategies, as needed. The City will continue to set priorities to meet the goals in the Consolidated Plan, shifting focus as needed to prioritize activities based on available funding and market conditions. The City may also explore additional leveraging opportunities to ensure adequate resources are available to address the extent of the City’s diverse housing needs.

Housing costs, for both rental and homeownership, have increased substantially and this is anticipated to have an impact on how available funding will be used to create homeownership opportunities in the future. Low-income homebuyers are unable to compete with investors in the open market and the gap between the purchase price of existing units and the maximum down payment assistance a household can qualify for continues to widen.

As a steward of federal resources, the City must make the best use of the limited resources available to achieve the maximum benefit for eligible individuals and families. Increasing the purchase assistance limit to make existing units affordable to a lower income household will significantly reduce the number of households that can be assisted. The City believes the best approach for increasing the number of low- and moderate-income homeowners is through partnerships with developers for the new construction of housing units. Increasing construction costs also play a major factor in housing production and rehabilitation and the City will continue to provide incentives and other resources, such as surplus land, to lower the cost of producing new affordable units.

**Include the number of extremely low-income, low-income, and moderate-income persons served by each activity where information on income by family size is required to determine the eligibility of the activity.**

|  |  |  |  |
| --- | --- | --- | --- |
| **Number of Households Served** | **CDBG Actual** | **HOME Actual** | |
| Extremely Low-income | 0 | 0 |
| Low-income | 0 | 0 |
| Moderate-income | 0 | 0 |
| **Total** | **0** | **0** |

Table 13 – Number of Households Served

**Narrative Information**

During PY 2021, the City committed $314,596 in State Housing Initiatives Partnership (SHIP) funding to Community Partners, a non-profit developer of affordable housing, for the rehabilitation of three (3) single-family homes to be sold to households at or below 80% AMI. Renovation of two of the homes has been completed and the third home will be completed in late Spring 2023.

The City also committed SHIP funding to Neighborhood Renaissance for two projects: (1) Coleman Park Renaissance, a 43-unit multifamily rental development to be completed in 2024 and (2) the new construction of two single-family homes for a very-low income and a low-income household. Construction of these two units is anticipated to be completed by June 2023. During the program year, Neighborhood Renaissance also completed the new construction of a single-family home on a lot conveyed to the City from the West Palm Beach Community Redevelopment Agency (CRA) with development funding also from the CRA.

During the 2021 program year, the City also had several rental projects under construction that include affordable/workforce units. These are Flagler Station (94 assisted units), The Grand (206 assisted units), 575 Rosemary (54 assisted units) and Merry Place Estates Townhomes (36 assisted units).

**Provide a summary of the efforts to address “worst case needs”, and progress in meeting the needs of persons with disabilities.**

Worst case needs are defined as low-income renters with severe cost burden, in substandard housing, or involuntarily displaced. During PY 2021, the City continued implementation of the Serving Our Seniors (SOS) Program and the Housing Stabilization Program. The SOS Program provides temporary assistance for critical needs to low-income elderly residents in the form of a one-time emergency grant that can be used for utility assistance, transportation, handicapped accessibility, and medical prescription assistance. The Housing Stabilization Program provides one-time financial assistance to families and individuals to gain or maintain housing stability. The program targets families and individuals who are housed but are at imminent risk of becoming homeless and homeless families or individuals seeking housing to remain within the City.

In addition to these City-operated programs, there are several local, private resources to assist persons with worst case needs including:

* Palm Beach County Community Services – offers emergency services such as food and clothing, rent/mortgage/utility assistance, and family self-sufficiency services that include job training, childcare, education, and financial counseling;
* Gulfstream Goodwill Industries - changes lives through employment, training, and housing to create vibrant communities, free of poverty, homelessness, and unemployment;
* Habitat for Humanity of Palm Beach County – partners with families to build and rehabilitate affordable homes so that residents can achieve the stability and independence to build a better life for themselves and their families;
* Housing Leadership Council of Palm Beach County – works on collaborative efforts to address issues that are destabilizing neighborhoods to ensure that there is an adequate supply of workforce housing;
* Community Partners – changes the odds for children and families facing adversity and creates lasting social change by providing comprehensive services and solutions that target behavioral/mental health, housing, and community;
* Neighborhood Renaissance – provides financial literacy and homebuyer counseling; COVID-19 rental assistance and relief program and builds homes that are within the financial reach of low- and moderate-income families and individuals.
* Northend RISE – addresses pressing housing, education, employment, and health concerns by providing mixed-income housing (housing renovation or repair for first time homebuyers), cradle-to-career education, and health and wellness checks, in the Northend neighborhoods of West Palm Beach, Coleman Park, and Pleasant City.

In regard to meeting the needs of persons with disabilities, the City utilizes its HOPWA funding to provide housing and supportive services/case management to individuals living with HIV/AIDS. As mentioned above, 226 households benefitted from the Palm Beach County Housing Authority’s Tenant Based Rental Assistance Program in the 2021 program year.

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

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

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

The City of West Palm Beach strives to provide an integrated array of housing and services in an effective and cost-efficient manner for the greatest number of persons experiencing homelessness. While West Palm Beach has not yet achieved its ultimate goal of ending homelessness, the City has been able to capitalize on existing opportunities as it navigates through complex systemic challenges.

The City has made gradual yet progressive strides toward eradicating homelessness and will continue to provide assistance to its homeless population. The City’s goal is to find transitional and permanent housing for the homeless while providing stable and secure support services. The City actively worked with homeless providers to help families move out of poverty through the funding and implementation of public service activities that promoted self-sufficiency and job attainment and retention skills. This also included community development activities that assisted the homeless and the near homeless to become active members of the community.

Recognizing that much of its homeless population had a difficult time accessing services for a variety of reasons (i.e. lack of transportation, mental health issues, or comorbidity disorders) the City made the funding of outreach services a high priority. By taking needed services to this population at locations they frequent, the City’s outreach team was able to intercede and intervene in ways that has increased access to community resources and helped reduce barriers to these services for homeless residents. The City also utilized CDBG funds for Homeless Outreach Program staff at Mental Health America. The Homeless Outreach Program staff worked daily with homeless individuals to provide linkages to local programs and mental health resources.

Based on the proposal of a homeless committee consisting of concerned residents and homeless agencies, the City hired a Homeless Outreach Coordinator. The Homeless Outreach Coordinator is responsible for the coordination of the street outreach teams, housing navigation, business education, and supportive services. In addition, the Homeless Activity Reporter, a web-based tool, was created to allow persons experiencing homelessness and/or at risk of homelessness to report their situation to improve the connection to needed services. As a result, the City now has a centralized and coordinated effort to more effectively allocate resources, services, and programs to best address the needs of those experiencing homelessness in the community.

**Resources Available**

Through its Department of Housing and Community Development, particularly its Community Services/Vickers House Division, the City provides funding, direct services, and programs for the homeless including the following: permanent housing; supportive housing; rapid rehousing; food assistance; relocation assistance; assessments; referral services; and job placement assistance. The Community Services/Vickers House staff consists seven full-time employees.

The City works closely with the Homeless and Housing Alliance (HHA) of Palm Beach County (the Continuum of Care lead agency) whose main function is to deliver a comprehensive and coordinated continuum of services for homeless individuals, families with children, veterans, and unaccompanied youth. This system’s fundamental components include the following: homeless prevention; outreach and assessment; emergency shelter; supportive services; permanent housing; and supportive housing.

The City also facilitates a monthly meeting where homeless agencies and City staff share information, explore resources for clients in need, and discuss ways to streamline the point of entry for potential clients. This has helped better target the use of the limited resources that are offered to people who are experiencing homelessness. It has also assisted in prioritizing assistance based on vulnerability and severity of service needs to ensure that people who need assistance the most can receive it in a timely manner.

The City leverages its resources with nonprofit and private sector organizations. For PY 2021, the following resources were available for various homeless assistance programs and activities that are supported or delivered by the City:

* Engagement team & Peer Outreach Program – City/HCD and Mental Health America: $145,000 (CDBG funding) and $150,000 from the WPB Downtown Development Authority
* Homeward Bound bus pass and relocation services - $10,000 annually (local funding)
* Tenant-based rental assistance (TBRA) and supportive housing - $3.2M annually (HOPWA funding)
* Rental Deposit Assistance/Housing Stabilization - $50,000 annually (State/SHIP funding)

The City’s Police Department and law enforcement professionals further support the City’s efforts by providing direct outreach to homeless individuals, building partnerships with a wide range of service providers, and encouraging its officers to be resourceful and show compassion for homeless persons. The Police Department has dedicated one (1) full-time officer who primarily deals with homelessness issues and has Community Engagement Officers who also support the homelessness prevention efforts through working with the City’s Outreach Team, Mental Health America, and area faith-based organizations. The Police Department also focuses its attention on nuisance related crimes and the areas listed below:

* Park Enforcement: Officers patrol City parks, offer assistance, and make arrests, as necessary.
* Illegal Solicitation: Officers check for panhandlers/trespassers on the I-95 off ramps, offer assistance, and make arrests, as necessary. Officers also work with FDOT who respond to issues and clean up trash and debris when needed. They also enforce aggressive panhandling ordinances in downtown and other areas frequented by solicitors.
* Partnerships and Referrals: Officers work with numerous external entities to assist individuals with seeking services such as Homeward Bound and other permanent housing solutions. They perform referrals to the Lewis Center and transport homeless to the facility. Officers also partner with internal organizations such as the Fire Department, Library Department, HCD, and CRA to address varying needs. Most importantly, officers educate business owners and residents about homeless individuals’ rights and what is needed to properly enforce trespassing laws.

Police officers recognize that enforcement actions and other efforts alone will not address the issue of homelessness. The City cannot police its way out of homelessness; however, outreach and law enforcement continue to be an important tool to address homelessness issues.

Overall, the City works closely internally and with many committed and talented social service providers, faith-based organizations, and substance abuse treatment centers on various programs and activities. City partners include but are not limited to:

* Senator Philip D. Lewis Homeless Center;
* Homeless and Housing Alliance (HHA) of Palm Beach County;
* Homeless Coalition of Palm Beach County;
* Palm Beach County Division of Human Services;
* The Health Care District of Palm Beach County;
* Continuum of Care and Ryan White Service Providers;
* The Lord’s Place;
* Catholic Charities;
* Mental Health America;
* West Palm Beach VA Medical Center;
* Gulfstream Goodwill;
* St. Ann Place;
* Vita Nova;
* South County Mental Health;
* Family Promise; and
* Center of Hope

**Homelessness Services Accomplishments**

In calendar year 2021 (January – December) the following was accomplished:

* **118** individuals experiencing chronic homelessness were connected to housing.
* **51** individuals experiencing chronic homelessness were reconnected with a loved one or family member.
* **339** individuals were provided with referrals and access to mental health and substance abuse resources.
* **96** local businesses and community groups were provided education and resources.
* **348** requests for assistance were submitted and addressed through the City’s online Homeless Activity Reporter (HAR).
* **2,393** engagements were conducted through city parks, neighborhoods and targeted areas.

Additionally, through the HOPWA TBRA program,226 households were assisted and six (6) households were assisted through the Housing Stabilization program.

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

The Senator Philip D. Lewis Center, a 66-bed emergency facility, serves as the main point of access for homeless services in Palm Beach County including access to emergency shelter, rapid rehousing and permanent supportive housing services.  Homeless individuals and families are referred to the Lewis Center from both the Community Services/Vickers House staff and the West Palm Beach Police Department. Vickers House staff also assists the Lewis Center with conducting initial screenings over the telephone. The City of West Palm Beach will continue to support efforts to provide additional shelter and transitional housing beds as funding permits.

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

The City provides funding for several services and programs for the homeless including the following: permanent housing; supportive housing; rapid rehousing; food assistance; relocation assistance; assessment; referral services; and job placement assistance. The City is also an active member of the Palm Beach County Homeless and Housing Alliance and actively supports the goals of the Palm Beach County Homeless Coalition. In PY 2021, the City through its CDBG Public Services set-aside, funded a homeless peer outreach program through Mental Health America, a nonprofit service provider. This program provided much needed services such as SOAR, mental health services, medication services and connection to housing. It also provided invaluable healthcare and other supportive services to scores of chronically homeless.  In addition, the City continued to work with service providers to coordinate basic needs such as food, transportation, employment, and healthcare which has helped provide stabilization for many homeless or at-risk of homelessness. Furthermore, the City used local funding to provide rental housing assistance through its Housing Stabilization Program, which helped 6 households avoid homelessness or come out of homelessness. The COVID-19 pandemic did have an effect on this service with the moratorium on evictions being in effect and the significant resources available to Palm Beach County to address this need.

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

In addition to the intake, assessment, and referrals provided at the Lewis Center and other homeless providers the City provides one time funding of up to $3,000 for eligible applicants facing evictions or experiencing homelessness to obtain safe, decent and affordable rental housing in the City of West Palm Beach. The City also partners with local churches to help. The City will continue to fund this program during the 2020-2024 Strategic Plan period.

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

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

During PY 2021, there were no specific public housing goals in the Annual Action Plan. However, the City continued to collaborate with both the West Palm Beach Housing Authority (WPBHA) and the Palm Beach County Housing Authority (PBCHA) on various programs and initiatives including community services, HOPWA, homelessness, and affordable housing opportunities.

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

Both the WPBHA and the PBCHA administer the Family Self-Sufficiency (FSS) Program for its residents. The FSS Program enables families to increase their earned income and reduce their dependency on rental subsidies.

The PBCHA annually budgets $25.00 per household to establish and fund Resident Councils at each of its public housing sites. The PBCHA has a Resident Advisory Board (RAB) which is made up of housing authority residents. The RAB provides recommendations to the PBCHA regarding its annual plans and policy changes.

The WPBHA also has Resident Councils. In addition, the WPBHA is a HUD approved Housing Counseling Agency that provides home buyer workshops to its residents. During PY 2020, 103 residents participated in the FSS program and four (4) participants achieved homeownership as a result of the programs offered by the WPBHA.

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

Not applicable. Neither of the two housing authorities are designated as “troubled”.

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

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

Annually, the City assembles an Affordable Housing Advisory Committee (AHAC) for the purposes of completing a Housing Incentive Strategies Report that recommends affordable/workforce housing regulatory incentives. The most recent Housing Incentive Strategies Report recommended specific actions or initiatives to encourage or facilitate the removal of regulatory barriers that limit or increase the costs of development and the preservation of affordable and workforce housing units in the City.

The recommendations outlined in the report included the modification or repeal of existing policies, procedures, ordinances, regulations, or plan provisions; the creation of exceptions applicable to affordable housing; or the adoption of new policies, procedures, regulations, ordinances, or plan provisions, including recommendations to amend the local government comprehensive plan and corresponding regulations, ordinances, and other policies.

The recommended incentives which have been approved by the City Commission include expedited permitting, modification of impact fees, density flexibilities for affordable housing, allowance of affordable accessory residential units in residential zoning districts, waiver of capacity charges for water and wastewater for affordable housing projects, reduction of parking and setback requirements, maintaining an inventory of public land for affordable housing, an ongoing process for review of policies and plan provisions that increase the cost of housing, among other incentives.

Reductions and fee waivers were applied to several projects in PY 2021 ranging from single family homeownership projects developed by affordable housing partners to large multi-family development projects. One such project was the Merry Place Gardens Apartment that received a water/waste capacity fee waiver of over $200,000.

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

The City of West Palm Beach employed several strategies that targeted investments in the areas of greatest need while taking advantage of leveraging opportunities. While some programs were offered on a city-wide basis to eligible households, others were targeted to specific geographic areas where a specific need has been identified or where leveraging opportunities provided for greater scale and impact.

In PY 2020 a greater emphasis was placed on the Tamarind Ave. corridor and surrounding areas of Coleman Park due to opportunities to leverage other resources such as the vacant parcels owned by the City. The City donated lots to nonprofit developers such as Neighborhood Renaissance for the development of owner-occupied housing within the targeted neighborhood. The City continued these efforts during PY 2021 by providing state/SHIP funding for the new construction of two single family homes by Neighborhood Renaissance and rehabilitation of three single family homes by Community Partners.

The City has under development a new community resource center, the Eva W. Mack Community Hub, that will be a central location for provision of social services by HCD, the Sickle Cell Foundation, and other non-profits that may lease office space at the facility.

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

The City continues to align its program procedures with HUD’s regulations derived from Title X of the Housing and Community Development Act of 1992.

The procedures that are implemented to reduce lead-based paint hazards are as follows:

* Identify lead hazards;
* Perform lead hazard reduction, using safe work practices and achieving clearance;
* Treat defective paint surfaces, either by covering the surface with a permanent wall covering (such as wallboard) or by safely scraping and repainting the surface;
* Implement ongoing maintenance where required;
* Respond to lead poisoned children;
* Obtain training for contractors and program staff on lead hazard evaluation and reduction;
* Develop methods and assemble materials to educate rental property owners, homeowners, and occupants of rental housing about the new requirements;
* Establish working relationships with lead professionals and key partners, such as risk assessors and clearance technicians, public health and HUD lead grantees; and
* Create procedures for determining when it is more cost-effective to presume that lead hazards are present and to evaluate a property.

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

The City, through its Departments of Housing and Community Development, Economic Development, Planning and Zoning, and the City Community Redevelopment Agency are providing programs and developing strategies that will assist with the reduction in poverty within the jurisdiction. These program and strategies include providing incentives for job creation and economic development through grant and loan programs that assist micro-enterprise development and new businesses both large and small along with providing zoning flexibilities that help spur economic investments. The City, including the CRA, is also investing in infrastructure projects in low and low-moderate income areas, helping to create a better investment environment and job creation.

The development and preservation of affordable and workforce housing for both homeownership and rental is another key strategy the City is pursuing along with providing temporary rental assistance through the City’s Rapid Rehousing Program and other homeless prevention efforts. Through its Community Services/Vickers House programs the City provides assistance to help vulnerable populations, including the homeless, elderly, disabled and targeted at risk youth to access services, get assistance with basic needs and learn new skills that help individuals reach their potential.

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

The City of West Palm Beach is the largest city and metropolitan area of Palm Beach County and therefore benefits from close proximity and association with public entities such as the County and private nonprofit and for-profit organizations that call West Palm Beach home. The two entities that play the largest role in affordable housing are the West Palm Beach Housing Authority and the Palm Beach County Housing Authority. Those entities collaborate on a regular basis with the City on various programs and initiatives including affordable housing opportunities, homelessness, community services, and HOPWA. The City also has certified CHDOs that assist with development of affordable housing. The City continues to utilize the infill lot donation program that has allowed for local organizations such as Habitat for Humanity, Neighborhood Renaissance, and other nonprofit entities to receive donated City owned lots for affordable housing development. This has allowed for increased capacity of these nonprofit entities.  There are a limited number of nonprofit housing development entities with capacity within the jurisdiction, especially for at-risk populations. The City continues to enhance its capacity building effort and also seek to locate new partners, both nonprofit and for-profit who have the expertise and capacity to finance and develop affordable and workforce housing.

The Palm Beach County Homeless and Housing Alliance provides the structure to advance programs and resources that aide and prevent homelessness. One of the main sources for services is the Senator Philip D. Lewis Center, which acts as a single point access center. This delivery system reduces duplication and improves coordinated efforts. The City of West Palm Beach continues to work with the Continuum of Care providers and the Homeless Coalition to find additional resources and strategies to address the needs of the homeless population and prevent homelessness from occurring while also leverage existing and new resources from the City's Vickers House location.

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

The City has taken great strides to establish a strong working relationship with the two primary housing authorities that serve the jurisdiction, the West Palm Beach Housing Authority and the Palm Beach County Housing Authority. The City has provided and will continue to provide support to those two entities to support their affordable housing efforts. As the primary provider of Tenant-Based Rental Assistance for the HOPWA program, the Palm Beach County Housing Authority will continue to work with the City to expand its role in providing housing assistance to at risk populations and working closer with the Ryan White and Continuum of Care service providers. Since PY 2016 that partnership was enhanced through a national pilot program that provides for client data sharing between HOPWA providers and Ryan White providers.

In PY 2015 the City started to place a greater emphasis on collaboration with Palm Beach County's Departments of Human Services and Housing and Economic Sustainability. Those efforts have continued in PY 2021 and beyond as the City seeks ways to leverage housing and community development resources and avoid duplication of efforts. That partnership has led to the development of a data sharing agreement for HOPWA and Ryan White programs, increased capacity to serve the homeless populations and several leveraging opportunities for homeownership development, and partnership to serve persons impacted by the COVID-19 pandemic through rental assistance or other eligible HOPWA-CV activities such as supportive services, transportation, short-term rent, mortgage, and utility assistance, and the leasing of hotel/motel. The City will continue to coordinate with the Homeless Continuum of Care, Homeless Coalition and Ryan White service providers. The City also has expanded its collaborative efforts with the Housing Leadership Council of Palm Beach County and the Florida Housing Coalition.

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

The Housing and Community Development Department has placed great emphasis on ensuring that the City complies with HUD regulations at 24 CFR 91.520 and related Fair Housing and Equal Opportunity (FHEO) program requirements. The City’s Analysis of Impediments to Fair Housing identified the following actions to overcome the barriers to fair housing choice:

* Continue to enforce local, state and federal fair housing laws by reporting violations and allegations of violations to the appropriate government agency;
* Provide information on fair housing laws to the public, its staff, Realtors, property owners and lenders through educational activities including workshops, public service announcements and presentations to targeted groups;
* Continue to staff a position to act as a Fair Housing Liaison;
* Update its website provide more online content related to fair housing information and where to file a complaint; and
* Provide education and outreach to landlords, providing information on fair housing rights to HCD clients, promoting fair housing month and providing funding for fair housing activities.

During 2020, the Mayor launched the “West Palm Beach Mayor’s Task Force for Racial and Ethnic Equality” to identify and help address issues of racial/ethnic equity in several areas including real estate and housing. The taskforce made several policy recommendations for expanding options for decent and affordable housing for both homebuyers and renters, mitigating financial barriers, and increasing programs and funding for prospective homebuyers. The City will monitor and report on the implementation of the recommendations going forward.

In 2021, the City was a recipient of a grant from the Florida Housing Coalition (Coalition) for the “Closing the Gap” Program, a two-year initiative of the Coalition’s Center for Racial Equity. Closing the Gap is a community-centered, sustainable, and systemic effort to close the gap in homeownership between the Black and white community.   During the 24-month grant period, the Coalition will provide technical assistance on the history, policies and practices, and the programs that impact racial inequity in housing and will help to formulate innovative solutions. Phase I of the Closing the Gap Initiative, development of an Equity Profile, was underway during the 2021 program year. The Equity Profile will provide a deeper look into the history of injustice and the legacy of inequality in West Palm Beach. The Equity Profile will present recommended strategies to address racial disparities in homeownership.

## CR-40 - Monitoring 91.220 and 91.230

**Describe the standards and procedures used to monitor activities carried out in furtherance of the plan and used to ensure long-term compliance with requirements of the programs involved, including minority business outreach and the comprehensive planning requirements**

The City’s Department of Housing and Community Development is responsible for ensuring that the federal funds spent on activities to benefit low- and moderate-income households are in compliance with federal guidelines. All subrecipients, contractors, developers, and project sponsors enter into contractual agreements with the City of West Palm Beach. These agreements include a detailed scope of services with measurable objectives. The federal provisions, along with the appropriate OMB Circulars, are also included in contractual agreements to ensure compliance and are included as part of the City's monitoring reviews for compliance.

The City of West Palm Beach monitors its grant programs in accordance with local program policies and procedures and federal regulations. The Department of Housing and Community Development staff continues to monitor all subrecipients of CDBG, HOME, and HOPWA funds. The monitoring process includes on-site reviews of the subrecipients’ performance to ensure compliance with the goals and objectives of the program and federal regulations. The City’s staff also monitors agencies through desk reviews of their monthly or quarterly performance reports, requests for payments, and their annual audit reports.

The Department of Housing and Community Development coordinates with the Finance Department regularly to review accounting records and compliance with OMB regulations. The Internal Auditors Office reviews the annual audit reports the City receives from its federal grant subrecipients.

**Citizen Participation Plan 91.105(d); 91.115(d)**

**Describe the efforts to provide citizens with reasonable notice and an opportunity to comment on performance reports**.

The City of West Palm Beach has devised specific actions to encourage increased participation in its housing and community development programs. Interested groups and individuals are encouraged to provide input into all aspects of the City’s consolidated planning activities – from assessing needs and setting priorities through performance evaluation.

 As required by HUD regulations, the City provided a 15-day public notice to the public for review and comment on the CAPER prior to its submission to HUD. An ad was published in the official local newspaper of general circulation (The Palm Beach Post Newspaper). Copies of the plan were made available to the general public. The public was invited to review and comment on the 2021-2022 CAPER. The City accepted comments until December 28, 2022.

**CR-45 - CDBG 91.520(c)**

**Specify the nature of, and reasons for, any changes in the jurisdiction’s program objectives and indications of how the jurisdiction would change its programs as a result of its experiences.**

During PY 2021 there were no changes to the CDBG Entitlement program objectives and the City continued to move forward with the implementation of public facility improvements in qualified low- and moderate-income census tracts as well as the provision of public service activities.

The City made a substantial amendment to the 2020 Annual Action Plan to add supplemental CDBG funding (CDBG-CV) of $1,584,650 as a resource to prevent, prepare for, and respond to the coronavirus (COVID-19). During PY 2021, the City has directed CDBG-CV funding to projects that will help to prevent the spread of COVID-19 as part of a longer-term recovery effort. The City expended $99,209 in CDBG-CV funds on program administration and on projects being implemented by the FAU Community Health Center and the Esperanza Community Center Outreach Program.

The City also subawarded $600,000 in CDBG-CV funding for the Clear Lake Multipurpose Trail project scheduled to be completed by October 2023. This project will assist in the recovery from the coronavirus pandemic by providing safe, efficient, and socially distanced pedestrian and bicycle access for the residents of over 3,700 residential units to the multiple employment, transportation, educational, medical, and social-service facilities located in Downtown West Palm Beach. The project involves the construction of a 10-foot-wide multimodal concrete trail and a boardwalk that will connect Palm Beach Lakes Boulevard to Okeechobee Boulevard and to downtown West Palm Beach.

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

No

## CR-50 - HOME 91.520(d)

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

According to 24 CFR 92.504(d), the City is required to conduct an on-site inspection of HOME-assisted properties within 12 months after the completion of the project and ongoing property inspections must be completed at least once every three years during the period of affordability. The City enforces a more stringent requirement for ongoing inspections and inspects HOME-assisted units annually. The following projects were due for inspection in PY 2021. All observed deficiencies were addressed during the reinspection.

| **Project Name** | **Number of HOME-Assisted Units** | **Date of Inspection** | **Deficiency** |
| --- | --- | --- | --- |
| Malibu Bay | 5 | 5/25/22 Initial inspection  6/21/22 1 unit reinspected  6/28/22 1 unit reinspected | Unit 09-102 GFI in the kitchen needed replacement  Unit 11-102 GFI in bathroom needed replacement, repair light switch on patio repair, broken tiles in bath and peeling paint |
| Dr. Alice Moore Apartments | 8 | 4/11/22 Initial inspections  5/25/22 4 units reinspected | Unit 211 needed GFI cleaned  Unit 307 mold from exhaust removed  Unit 312 evidence of roach infestation  Unit 411 Screen in living area needed to be replaced |
| Georgian Gardens | 4 | 5/6/22 Initial inspection | None |
| 1016 23rd Street | 1 | 6/3/22 Initial inspection | None |
| Henrietta Townhomes | 11 | 6/1/22 Initial inspection  6/6/22 1 unit reinspected | Unit 11 Master Bedroom lights trips the breaker box. |

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

The Department complies with all Equal Opportunity requirements on the basis that "No person in the United States shall on the grounds of race, color, national origin, religion, or sex be excluded from participation in, be denied benefits of, or be subject to discrimination under any program or activity funded in whole or in part with HOME funds." HOME funds were made available in accordance with the requirements of the Fair Housing Act (42 U.S.C. 3601-20). The City of West Palm Beach and its developer partners took the necessary steps to affirmatively market the HOME program through public meetings, distribution of literature, and other good faith efforts.

Affirmative marketing efforts were directed to eligible persons from all racial, ethnic and gender groups in the housing market to HOME units supported by the City’s HOME program.  Rental owners, CHDOs and other participating agencies were informed and entered into agreements where it was indicated that they are required to maintain records documenting their affirmative marketing actions. Such records shall include copies of advertisements, brochures, applications, and income certifications. Participants will be informed if they met the Affirmative Marketing requirements and what corrective actions, if any, are recommended. Recipients of City HOME CHDO funds were encouraged to utilize small business contractors and subcontractors including minority contractors. Outreach efforts were reviewed through copies of bids, contracts, advertisements or other appropriate documents which will demonstrate small business outreach efforts. The records also included a description and dollar amount of all work performed by small business firms in connection with HOME assisted projects.

The requirements of the Code of Federal Regulations (24 CFR Section 92.350) relating to small business enterprises were incorporated into all agreements with rental owners, CHDO's, and other agencies receiving HOME funds.

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

The HOME program received $42,844 in program income during PY 2021. These funds will be carried over to PY 2022 for program activities. Program income received was the result of amortizing loan principal payoffs associated with previous HOME-funded projects and the collection of current interest payments.

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

In August 2021, the City Commission approved the creation of the Downtown Master Plan (DMP) Housing Incentive Program for the purpose of promoting the construction of residential units for families earning between 60% and 100% of the area median income within the Downtown. The program offers additional development capacity through the transfer of development rights program within the downtown and surrounding areas. During PY 2021, the City developed implementing guidelines for the DMP Housing Incentive Program and continued to explore policy actions to increase the supply of affordable housing. This includes the creation of standards for the review of residential projects subject to Section 166.04151, Florida Statutes, providing for the development of affordable housing on parcel zoned for residential, commercial, or industrial use.

## CR-55 - HOPWA 91.520(e)

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

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

|  |  |  |
| --- | --- | --- |
| **Number of Households Served Through:** | **One-year Goal** | **Actual** |
| Short-term rent, mortgage, and utility assistance payments | 0 | 0 |
| Tenant-based rental assistance | 250 | 226 |
| Units provided in transitional housing facilities developed, leased, or operated with HOPWA funds | 0 | 0 |
| Units provided in permanent housing facilities developed, leased, or operated with HOPWA funds | 0 | 0 |
| **Total** | 250 | 226 |

Table 14 – HOPWA Number of Households Served

**Narrative**

The City of West Palm Beach is the recipient of the HOPWA formula grant for the Palm Beach County Eligible Metropolitan Statistical Area (EMSA). The City ensures that the HOPWA program is administered and implemented both programmatically and fiscally in accordance with federal, state, and local regulations and guidelines. The HOPWA grant serves income eligible persons and families living with HIV/AIDS throughout Palm Beach County. Housing availability, affordability, and accessibility are major concerns in Palm Beach County.

During PY 2021, the City partnered with one project sponsor, Palm Beach County Housing Authority (PBCHA), to provide housing subsidy assistance and support services for income eligible persons living with HIV/AIDS in Palm Beach County. These services included Tenant-Based Rental Assistance (TBRA) and Supportive Services including the provision of case management, client advocacy, and access to benefits and services.

The City worked with PBCHA to coordinate services and ensure optimal utilization of HOPWA resources. The City and its HOPWA project sponsor increased collaboration with the Palm Beach County HIV CARE Council and Ryan White Provider meetings in an effort to determine the unmet housing needs of HIV/AIDS clients. The City is also working closely with Palm Beach County on a data integration project with the Palm Beach County Ryan White Part A program and its award of a HHS/HUD “Addressing HIV Care and Housing Coordination Through Data Integration” grant. The grant funds were provided by the RAND Corporation with the goal of improving health outcomes along the HIV Care Continuum.

During FY 2020, the City received a supplemental award of HOPWA funding under the CARES Act referred to as HOPWA-CV. The HOPWA-CV funding was subawarded to Palm Beach County (Community Services Department) for various eligible activities including the provision of supportive services, permanent housing placement, leasing hotels/motels to quarantine HOPWA eligible persons or their household members, and the payment of short-term rent, mortgage, and utility payments for up to 24 months. The County has three years in which to expend the program funding of $440,000 to serve up to 120 households.

Additional information is provided in the HOPWA CAPER.

## CR-58 – Section 3

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

Section 3 is a provision of the Housing and Urban Development Act of 1968. The purpose of Section 3 is to ensure that employment and other economic opportunities generated by certain HUD financial assistance shall, to the greatest extent feasible, and consistent with existing Federal, State, and local laws and regulations, be directed to low- and very low-income persons, particularly those who are recipients of government assistance for housing, and to business concerns which provide economic opportunities to low- and very low-income persons. Section 3 applies to housing and community development financial assistance projects assisted under HUD programs when the total assistance to the project exceeds a threshold of $200,000.

The City did not execute contracts for any new projects after November 30, 2020 therefore the Section 3 regulations at 24 CFR Part 135 (the old rule) applied to public construction projects that were underway during PY 2021. The City maintains records of Section 3 compliance for projects committed before the effective date in the project files.

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
| **Total Labor Hours** | **CDBG** | **HOME** | **ESG** | **HOPWA** | **HTF** |
| Total Number of Activities | 0 | 0 | 0 | 0 | 0 |
| Total Labor Hours |  |  |  |  |  |
| Total Section 3 Worker Hours |  |  |  |  |  |
| Total Targeted Section 3 Worker Hours |  |  |  |  |  |

Table 15 – Total Labor Hours

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
| **Qualitative Efforts - Number of Activities by Program** | **CDBG** | **HOME** | **ESG** | **HOPWA** | **HTF** |
| Outreach efforts to generate job applicants who are Public Housing Targeted Workers |  |  |  |  |  |
| Outreach efforts to generate job applicants who are Other Funding Targeted Workers. |  |  |  |  |  |
| Direct, on-the job training (including apprenticeships). |  |  |  |  |  |
| Indirect training such as arranging for, contracting for, or paying tuition for, off-site training. |  |  |  |  |  |
| Technical assistance to help Section 3 workers compete for jobs (e.g., resume assistance, coaching). |  |  |  |  |  |
| Outreach efforts to identify and secure bids from Section 3 business concerns. |  |  |  |  |  |
| Technical assistance to help Section 3 business concerns understand and bid on contracts. |  |  |  |  |  |
| Division of contracts into smaller jobs to facilitate participation by Section 3 business concerns. |  |  |  |  |  |
| Provided or connected residents with assistance in seeking employment including: drafting resumes,preparing for interviews, finding job opportunities, connecting residents to job placement services. |  |  |  |  |  |
| Held one or more job fairs. |  |  |  |  |  |
| Provided or connected residents with supportive services that can provide direct services or referrals. |  |  |  |  |  |
| Provided or connected residents with supportive services that provide one or more of the following: work readiness health screenings, interview clothing, uniforms, test fees, transportation. |  |  |  |  |  |
| Assisted residents with finding child care. |  |  |  |  |  |
| Assisted residents to apply for, or attend community college or a four year educational institution. |  |  |  |  |  |
| Assisted residents to apply for, or attend vocational/technical training. |  |  |  |  |  |
| Assisted residents to obtain financial literacy training and/or coaching. |  |  |  |  |  |
| Bonding assistance, guaranties, or other efforts to support viable bids from Section 3 business concerns. |  |  |  |  |  |
| Provided or connected residents with training on computer use or online technologies. |  |  |  |  |  |
| Promoting the use of a business registry designed to create opportunities for disadvantaged and small businesses. |  |  |  |  |  |
| Outreach, engagement, or referrals with the state one-stop system, as designed in Section 121(e)(2) of the Workforce Innovation and Opportunity Act. |  |  |  |  |  |
| Other. |  |  |  |  |  |

Table 16 – Qualitative Efforts - Number of Activities by Program