



City of Sanford
Community Development Block Grant
Annual Action Plan
2014 – 2015



Prepared By:

Andrew Thomas
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City of Sanford, Florida



Third Program Year Action Plan FY 2014 - 2015 Narrative Responses

ACTION PLAN

Annual Action Plan includes the [SF 424](#) and is due every year no less than 45 days prior to the start of the grantee's program year start date. HUD does not accept plans between August 15 and November 15.

On October 1, 2014, the City of Sanford, Florida will receive \$379,551 in Community Development Block Grant funds as a fifth year entitlement City under the Jacksonville HUD Office CPD.

In order to receive these funds in FY 2014, the City is charged with the task of developing and implementing a 5-year Consolidated Planning Document for the period 2010-2014 and an Annual Action Plan detailing program activities for each fiscal year. For the 2010-2011 program years, the City of Sanford received \$485,388, for the 2011-2012 program year received \$404,880, for program year 2012-2013 received \$390,489, and for the 2013-2014 program year received \$428,791. For the four years the City of Sanford has received a total of \$1,709,548 in CDBG funding. The purposes of the funds were to improve the lives of its citizens through community and neighborhood development objectives.

Pursuant to the City's Citizen's Participation Plan, a thirty-day comment period for the 2014-2015 One Year Action Plan began Tuesday, May 27, 2014 and ended Wednesday, June 25, 2014. Any comments regarding the plan were to be made to The Office of the City Manager by 5:30PM June 25, 2014. During this period, the One Year Action Plan was in DRAFT form and was available for public review at The Office of the City Manager, City Hall 300 North Park Avenue, Sanford, Florida 32771. The Public Hearing to receive comments on the plan was held Tuesday, June 10, 2014 at City Hall. Also, the draft plan was reviewed by the CDBG Citizens Advisory Board at the June 10, 2014 meeting. A variety of forums were available for citizens to comment on the 2013-2014 draft Action Plan. Verbal comments were accepted at an advertised public hearing, emails and written comments were to be sent as instructed below. Any public comments were received, are attached and made a part of this Annual Action Plan to be reviewed and approved by the City Commission at the July 14, 2014 meeting.

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Executive Summary 91.220(b)

1. *The Executive Summary is required. Include the objectives and outcomes identified in the plan and an evaluation of past performance.*

Program Year 5 Action Plan Executive Summary:

Located close to downtown Sanford, and bordering the City's CRA, are two predominantly and historically African-American neighborhoods that comprise the City's designated target areas: Goldsboro and Georgetown neighborhoods. Collectively, they contain the majority of the City's older, deteriorating housing stock, poor infrastructure systems, blighted structures, and high rate of vacant properties, high rate of crime, high unemployment rate and a tremendous lack of social and human services.

In the past, the majority of the City's Community Development Block Grant (CDBG) funding allocation in partnership with Seminole County's CDBG Program has been utilized within the City's target areas. These specific neighborhoods have and will continue to be addressed due to the lack of adequate resources, social services and the need to establish self-sufficiency among its population and revitalize the neighborhoods.

The total funding allocation for the City of Sanford's FY 2014-2015 CDBG Program is \$379,551, which represents an 11.5% decrease from FY 2013-2014. The funding decrease will limit the City of Sanford's efforts to expanded activities in the target areas specifically housing rehabilitation programs. Also, the decrease will impact the City's commitment to fulfill its community development objectives and goals increasing the inventory of decent, safe and affordable housing.

Fifteen percent of the CDBG Program funding is allocated to Public Services. Although limited funding for Public Services has always been an issue, the challenge this year will be the same as in the past, allocating the limited Public Services funds due to the 15% cap in response to the forever expanding human and social services demands in the target areas. This year the full fifteen percent of the City's allocation will be used for Public Services due to the overwhelming demand from the community for more services for at risk youth and seniors. The City published a Notice of Funding Availability (NOFA) in April of 2014 and received five proposals for the \$56,932 funding available.

Although the economy is showing signs of recovering, The City of Sanford's local government continues to experience decreasing revenues as a result of: the state of the economy, lingering decrease in ad valorem and other taxes, stagnant property values, high vacancy rates in housing due to the residual foreclosure crisis, need for more jobs, and the relocation of businesses, resulting in a reduction in revenues, consumer spending, and other factors due to the severe fallout of national and local economies. The City of Sanford, similar to other small cities around the country, continues to be deeply affected by the volatile economy.

The past year wasn't as difficult as the prior year (2012) when the City of experienced the national spotlight cast upon it from the Trayvon Martin/George Zimmerman case and the negative image created by news media and civil rights organizations. During 2013 the nation became fixated on Sanford again with the George Zimmerman trial. The national media for a second time focused on the poor housing and poor infrastructure conditions in Goldsboro and Georgetown and emphasized the long term neglect of these communities as the foundation

for the black community's unrest over the Trayvon Martin incident. With the renewed national attention came a new resolve by the black community to push for change, better housing, and employment opportunities for the youth and revitalization of their communities. In response to the communities outcry for improved living conditions, the City of Sanford actively engaged in planning with the communities to improve the quality of living conditions in the target areas, this included creating leadership development and employment opportunities for the youth, economic development assistance for the businesses, installation of new sidewalks and curbs, installation of new street lights to improve safety, replaced playground equipment and initiated a housing rehabilitation program.

While some nationally based economists still feel "signs of recovery have begun" the national housing crisis continues. According to a new study from the foreclosure tracking firm Realty Trac, Florida was home to eight of the country's top ten metropolitan areas for highest foreclosure rates last year. The Orlando-Kissimmee, Lakeland, Jacksonville, Tampa-St. Petersburg and Melbourne areas of Florida all have at least twenty eight months' worth of foreclosed properties for sale. Foreclosed properties account for twenty four percent of all sales and foreclosure activity increased fifty percent last year. Florida remains one of the most problematic states when it comes to foreclosures. The City of Sanford likewise continues to be deeply affected by the volatility of the economic and a high foreclosure rate.

During the first four years of implementation of the Community Development Block Grant program, the City has determined that it wants / needs to reprogram funds into projects, it has deemed necessary to leverage additional funding and stabilize the community. The closing of the Sanford Housing Authority's six complexes representing approximately four hundred and eighty units has placed a tremendous challenge on the City of Sanford's decent and safe affordable housing inventory. The closing of the Sanford Housing Authority properties is compounded with an aging existing housing stock that is in need of extensive repairs, rehabilitation and some demolition. Rehabilitation of many of the existing housing units is further compounded by the low assessed value of the property and the HUD Environmental Review limitation of maximum expenditure on a property is fifty percent of its assessed value. Add to this dynamic the demographics of the community; increasing number of low-income elderly residents, high unemployment rate and single mothers with a higher than average persons per household rate. Overall, the City of Sanford poverty index has increased from 18.5% of persons below poverty level in 2010 to 20.1% for 2013. This represents an increase of 1.6 in three years. Compared to the state rate of 15.6% and the Seminole County's rate of 10.8% representing increases of 1.8% and 1% respectively for the same period. In summary the City of Sanford poverty rate is higher than the state rate and almost double that of Seminole County. The City of Sanford represents approximately 12.8% of Seminole county population and approximately 16.8% of the families living in poverty

The City recognizes that any effort to address the housing situation caused by the closing of the Sanford Housing Authority will require a community wide endeavor that will need to encompass the entire Goldsboro neighborhood to make a significant impact. To this end, the City of Sanford is actively working with the Sanford Housing Authority to submit a Choice Neighborhood Planning Grant Application for the 2014 FY. The City of Sanford realizes it is also necessary to attend to the revitalization of the heart of the Goldsboro Neighborhood, Historical Goldsboro Boulevard to affect a true impact on the area. A number of activities have taken place or in the works on the corridor (Historical Goldsboro Boulevard) from

William Clark (formally Lake Avenue) west to Persimmons Avenue. There is still a pressing need of more infrastructure improvements, commercial revitalization, and financial assistance to the small businesses attempting to remain in the area. The City is still contemplating if it may be beneficial for the City of Sanford to declare the Historical Goldsboro Boulevard Corridor a blighted area to justify and attract increased HUD funding to comprehensively address the long standing improvements needed to truly reestablish the community as economically, socially, and physically viable.

The City of Sanford and Seminole County's homeless situation was highlighted in two "60 Minutes" documentaries, one in November of 2011 and one in January of 2012. The documentaries "Homelessness: *The Hard Times Generation*" focused on the growing homeless population in the region with an emphasis on the number of homeless families with children. To this end the City of Sanford established the City of Sanford Homeless Task Force to focus on the homeless situation. Funds were designated from year three allocation to augment Seminole County's homeless strategic plan to increase the number of female beds and add a new administration wing to the Rescue Outreach Mission. The City continues to work with the Recovery House of Central Florida and the Sharing Center to find new locations in the City of Sanford. The City is working with The Turning Point of Central Florida to reopen their Homeless Drop-in Center in downtown Sanford.

The conjunction with establishing the Homeless Task Force, the City of Sanford is actively involved in the Community Conversation on Homelessness for Seminole County, Homeless Services Network, and the Central Florida Commission on Homelessness.

In light of the growing social needs in the target areas, the City of Sanford is concentrating its funding for the fifth year to address housing rehabilitation efforts, youth training and employment, in Goldsboro and Georgetown areas and infrastructure improvements. In addition, all unexpended funding will be re-allocated from prior years to address the housing rehabilitation needs in the City of Sanford.

Citizens' input on this year's plan was sought at a public hearing held at the Sanford City Hall on June 10, 2014 and a community meeting held on May 22, 2014, which took place just prior to public comment period on the proposed Annual Action Plan. The public was encouraged to submit project concepts for consideration of potential CDBG funding. The June 10, 2014 public meeting was intended to provide local citizens and organizations with information relevant to proposed programs parameters and projects being carried over for the current year and those proposed for the 2014 FY. To increase citizen's participation in the process, during the 2013-2014 program years, the City of Sanford established a Citizen's Advisory Board to assist the CDBG Coordinator in the review of proposed projects seeking CDBG funding. The Advisory Board meetings which are public meetings reviewed the proposed activities for 2014 FY at its May meeting prior to the official posting of the comment period.

On July 14, 2014, the Sanford City Commission approved the FY 2014–2015 Annual Action Plan. Authorization was granted for the Mayor to sign the attached Grantees Certification and the application for Federal Assistance (Form 424) and direct the Office of the City Manager to transmit the plan to the U.S. Department of Housing and Urban Development (U.S. HUD).

Proposed Activities

The following activities constitute the use of funds for the fifth Program Year (2014-2015) for the CDBG Program:

Public Services	\$56,932
Employment and Training for Youth/Youth Services	
Public safety and security for the elderly	
Public Facilities	\$75,000
Infrastructure, playgrounds, waterlines, curbs, sidewalks streetlights and sewers	
Affordable Housing (Rehabilitation)	\$161,709
Home Improvement Emergency Repairs	
Code Enforcement	\$10,000
Clearance and Demolition	
Economic Development	\$0
Special Economic Development Activities / Priority to business in the Georgetown area	
Planning/Administration	\$75,910
General Administration of the CDBG Grant	
TOTAL	\$379,551

The listing of proposed projects in the One Year Action Plan provides details on each of the above program activities.

Performance Measurement

The following depicts the Objectives, Outcome Categories, Outcome Indicators, and Outcome Measures for 2014-2015 activities:

<i>Activity</i>	<i>Objective</i>	<i>Outcome Category</i>	<i>Outcome Indicator</i>	<i>Outcome Measure</i>
<i>Employment and Training</i>	Economic Opportunity	Sustainability	#of persons assisted with new or improved access to a service	0P
<i>Services for Seniors/Youth/Homeless: Life Skills, Counseling, Mentoring, and cultural and Arts</i>	Suitable Living Environment	Availability/ Accessibility	# of persons assisted with new or improved access to a service	250P
<i>Clearance and Demolition</i>	Suitable Living Environment	Sustainability	# lots cleared/possible available for safe and decent housing	2U
<i>Senior Citizen Housing Rehabilitation</i>	Decent Housing	Affordability	# of houses rehabilitated to maintain safe, sanitary, and decent housing stock	0H
<i>Special Economic Development</i>	Economic Opportunity	Sustainability	# of business/persons assisted with improvements to their business	0B
<i>Home Improvements Minor Rehabilitation</i>	Safe and Decent Housing	Affordability	# of houses rehabilitated to maintain safe, sanitary and decent housing	11H
<i>Public Facilities</i>	Suitable Living Environment	Sustainability	# of linear feet of sidewalks, curbs, sewers, waterlines installed	2,000ft

Past Performance

On September 30, 2014, the City of Sanford will be completing its fourth year of CDBG funding under its 2010-2014 Consolidated Planning document. The City continues to be challenged with setting up programs for the first time. As is the case of all new entitlement communities, Sanford spent its first and part of the second year organizing and researching for the successful implementation of its CDBG program. Having gone through the learning curve and participating in available training, the residents of Sanford experienced a dramatic increase in the level of CDBG activities in the target areas during the fourth year. During year three the City successfully established its Housing Immediate Needs Repair program, (a roof repair and replacement program for senior owner occupied housing), a minor emergency repair program and the economic development program for business in the Goldsboro area.

Thanks to the support of HUD staff and technical assistance the CDBG staff is becoming more familiar with the HUD Integrated Distribution and Information System (IDIS) and the Disaster Recovery Grant Reporting (DRGR) system requirements. The technical assistance and support provided by HUD staff has been very beneficial and educational. The City is completing its drawdowns in a timely manner and complaint with HUD requirements.

Several of the projects selected in the first program year that experienced financial difficulty and not being able to carry out their funded activity in a timely manner have been defunded. These projects were reevaluated and funds reallocated to programs in demand by the community. The City of Sanford submitted two Amendments to the first and second year Annual Action Plan that reallocated the unencumbered funds to fund infrastructure

improvements, thus positioning the City to meet the timeliness ratio of spending funds. The City is in the process of preparing an amendment to reallocate all unencumbered funds for the three prior years to the housing rehabilitation activity; the housing immediated needs program has a waiting list of approximately 45 applications waiting to be processed when funds become available.

The amendments were consistent with and adhered to the goals and objectives established in 2010-2014 Consolidated Plan

Citizen Participation 91.220(b)

2. Provide a summary of the citizen participation and consultation process (including efforts to broaden public participation in the development of the plan.

The City of Sanford has identified, contacted and collaborated with local and regional non-profit organizations offering services such as: health services, social services and fair housing service agencies, including those focusing on services to children, elderly persons, persons with disabilities, persons with HIV/AIDS and their families, homeless and chronically homeless persons. In addition, the City will continue to coordinate its planning process with regional private and governmental health, mental health, and social service agencies.

The City Commission appointed an Advisory Board to oversee the CDBG program and make recommendations to the Commission on program activities. The Advisory Board consists of a six (6) member panel. The members are appointed as follows: Each of the four City Commissioners has one appointee and the Mayor has two appointees. The Advisory meets the second Tuesday of each month and the meetings are publically noticed and open to the public.

Efforts made to broaden the process

The City, through its ongoing public participation/consultation process, continually seeks to broaden this process by involving new and/or incipient nonprofit organizations in its various programs and by continuing its efforts to provide information to residents. Public hearings were held in the City Chambers located at City Hall on June 10, 2010. In addition to the public hearing the public had opportunities to provide input into the Annual Planning process through the following opportunities:

- On April 23, 2014 an informational meeting was held to review the NOFA for Public Services activities.
- On April 28, 2014 the City Commission reviewed the proposed funding levels for projects and approved the funding levels.
- May 10, 2014 the CDBG Advisory Board reviewed the proposed allocations approved the City Commission.
- May 22, 2014 the proposed allocations and Public services were shared at the monthly Westside Community meeting.
- From May 27, 2014 – June 25 was the open comment period for the 2014 FY DRAFT Annual Action Plan.
- June 10, 2014 a Public Hearing was held at City Hall in the Commission Chambers to receive comments of the plan.

- On July 14, 2014, the City Commission approved the draft Annual Action Plan for submission to the U.S. Department of Housing and Urban Development.

Program Goals for Public Hearings	Public Hearing and Community Meetings
Announcement of funding availability for Public Services Programs	April 16, 2014
Informational Meeting	April 23, 2014
CDBG open meeting to review Annual Action Plan	May 10, 2014
Community meeting to share Annual Action Plan	May 22, 2014
Receive comments concerning draft Annual Action Plan	May 27 2014- June 25, 2014
Public Hearing	June 10, 2014
Commission Approval	July 14, 2014

As previously mentioned, this process included holding public hearings during which the community input was sought through the use of solicitation of ideas and program priorities at both public hearings; review of the proposed program goals and objectives, make available technical assistance; advertise the availability of funds; and provide a thirty day public comment period of the FY 2014-2015 One-Year Action Plan documents. Residents and local and regional agencies were encouraged to attend the aforementioned public hearing and were notified in the following manner: neighborhood organizations, the City’s website, commission level involvement and local newspaper advertisements.

No one attended the public hearing, which was held on June 10, 2014 at 5:00PM at Sanford, City Hall.

At the community meeting held on April 23, 2014 at the Public Safety Complex there were 25 citizens in attendance representing the following non-profits and businesses and two CDBG staff and one City Commissioner:

- Brothers Keepers
- Goldsboro Front Porch Council Inc. (youth employment and training)
- Westside Goldsboro Historic Association
- GoldenRule Housing and Community Development Corporation (specializing in affordable housing)
- Great Honor House (specializing in transitional housing for the homeless)
- J & W Driver Improvement School
- Sanford Housing Authority
- Word of Faith Ministries
- Bread of Life
- Expressly You School of the Arts

This plan concurs with the information presented in the approved FY 2010-2014 Consolidated Planning Document, underscoring its program goals and objectives for implementation. As previously stated, the current Consolidated Plan utilized information drawn from a number of other plans, documents and website in order to coordinate and collate data gathering in support of developing local program goals and the allocation of CDBG funding. These include: the Housing Element of the City of Sanford's 2009 updated Comprehensive Plan, the Community Redevelopment Agency's collaborated Master Redevelopment Plan, East Central Florida Regional Planning Council resources, Regional Continuum of Care, the 2000 and 2010 Census of Population and Housing Data, the Florida Housing Finance Corporation, and the University of Florida's Shimberg Center for Housing Studies.

The publication of the proposed One-Year Action Plan 30-day public comment period started on May 27, 2014 and ended June 25, 2014 and was published in the Sanford Herald.

Comments received on the plan are categorized and included as Appendix B to this Annual Plan Action.

3. *Provide a summary of citizen comments or views on the plan.*

Any citizen comments received have been summarized and placed in Appendix B.

4. *Provide a written explanation of comments not accepted and the reasons why these comments were not accepted.*

All comments received were responded to within 15-day period in conformance with the Citizen Participation Plan. The explanation of "whether or not" the comments have been either accepted or denied will be included. Accommodation is attempted to meeting all serious housing and community development needs expressed to the Community Improvement Office. The limited funds received for CDBG eligible activities preclude the city from addressing all but the direst needs at this time. Consequently, some comments, although accepted and considered, cannot always be met with funding initiatives. However, public comments and concerns will be included in the planning process for development of long-term goals and objectives.

During this planning process there was only one comment received from Meals on Wheels requesting clarification on the Public services NOFA.

Resources 91.220(c)(1)) and (c)(2)

5. *Identify the federal, state, and local resources (including program income) the jurisdiction expects to receive to address the needs identified in the plan. Federal resources should include Section 8 funds made available to the jurisdiction, Low-Income Housing Tax Credits, and competitive McKinney-Vento Homeless Assistance Act funds expected to be available to address priority needs and specific objectives identified in the strategic plan.*

The City of Sanford, Florida will receive \$379,551 in CDBG funds for Program Year 2014-2015.

The following table illustrates funding directly to the City of Sanford as well as area wide benefit funds available to City residents for housing programs, homeless prevention, Section 8 vouchers, public housing and other program resources.

	Jurisdiction/Agency Name	Program	Funds Available
1.	City of Sanford	CDBG	\$376,511
2.	City of Sanford	NSP	\$0
3.	Seminole County	SHIP	\$0
4.	Public Housing Authorities- Sanford and Seminole County	Section 8 Voucher Program	\$ 4,032,848
5.	City of Sanford- Community Improvement Department	LIHEAP	\$ 1,075,247
6.	Seminole County	Emergency Shelter Funds (ESG)	\$139,480
7.	Seminole County	HOME Funds	\$ 534,403

6. Explain how federal funds will leverage resources from private and non-federal public sources.

The City of Sanford continues to partner with Seminole County Government for Community Development Block Grant funds. This partnership has fostered a high level of inter-governmental cooperation and coordination. As the City of Sanford’s program becomes more established, a greater emphasis will be placed on recommendations for projects that contain a fair amount of leveraged funding. As of July 1, 2014 the City of Sanford entered into an Interlocal Agreement with Seminole County to provide day to day administration of the City’s CDBG program.

The following recommended projects include leveraged funds:

- Meals on Wheels etc. \$45,000 from the Weatherization Program : During the first year of the Senior Roof Repair Program, Meals on Wheels provided additional services to clients that included, window replacement, insulation, and door replacement.
Total funds leveraged \$45,000

Annual Objectives 91.220(c)(3)

**If using the CPMP Tool: Complete and submit the Summary of Specific Annual Objectives Worksheets or Summaries.xls*

7. Provide a summary of specific objectives that will be addressed during the program year.

A summary of specific fifth Year (Program Year 2014-2015) objectives appear below:

Homeless Objectives

- Partial funding for the renovation of a non-residential homeless facility to provide support services to the homeless on a day bases. “Day Drop-In-Center”.

Special Needs Objectives

- Provide opportunities for youth to receive support services to include, life skills, leadership development, mentoring, and tutorial assistance.
- Provide facility improvements for local services distribution
- Increase access for improved job skills, training and increased self-sufficiency

Community Development Objectives

- Target area public facility improvements to include new streetlights, sidewalks and curbs
- Public and emergency services for at-risk populations
- Eliminate slum and blighting influences in low income communities
- Enhance the quality of life in low and moderate income area by improving common areas such as parks, playgrounds and tot lots

Housing Objectives

- Provide opportunity for affordable housing in-fill construction on cleared vacant lots
- Provide homeowner occupied housing rehabilitation assistance to low and moderate income households.

Economic Development Objectives

- During this PY 2014 the City does not plan any Economic Development in the target areas

Description of Activities 91.220(d) and (e)

****If not using the CPMP Tool: Complete and submit Table 3C***

****If using the CPMP Tool: Complete and submit the Projects Worksheets and the Summaries Table.***

- 8. Provide a summary of the eligible programs or activities that will take place during the program year to address the priority needs and specific objectives identified in the Consolidated Plan.***

Describe the outcome measures for activities in accordance with Federal Register Notice dated March 7, 2006, i.e., general objective category (decent housing, suitable living environment, economic opportunity) and general outcome category (availability/accessibility, affordability, sustainability).

The following projects provide details on each of the proposed program activities.

Public Services -\$56,932

Mentoring Program -\$15,000

This public service program will provide for a mentoring program targeting at risk young males from the target areas.

Cultural and Arts Program: -\$24,432

This program will expose youth from the target areas to the cultural and arts as well as providing tutorial assistance.

After School Programs: \$15,000

The program will provide a variety of activities and organized games for middle and high schools students.

Healthy Living: \$2,500

This program will provide for a community garden and workshops on healthy life styles and gardening.

Public Facilities - \$75,000

Infrastructure Improvements (Construction and installation)

To include but not limited to sidewalks, streets, curbs, waterline, and sewer lines and streetlights.

Neighborhood Facilities

To include recreational facilities, parks and playgrounds.

Code Enforcement - \$18,000

Clearance and Demolition - \$18,000

To include the clearance and demolition of two unsafe, dilapidated structures in the target areas of the City.

Affordable Housing Rehabilitation - \$75,000

Home Improvements (Immediate Needs)

This program is intended to provide opportunities for immediate needs repairs for eligible homeowner occupied housing units.

Economic Development (Special Economic Development) - \$0

Business Development Assistance

The City of Sanford will not engage in any Economic Development activities during this program year.

Planning / Administration - \$75,910

These funds will be used to pay Seminole County expenses for general planning and administration of the CDBG grant for the City of Sanford.

Goals and objectives to be carried out during the action plan period are indicated by placing a check in the following boxes.

<input checked="" type="checkbox"/> Objective Category Decent Housing Which includes:	<input checked="" type="checkbox"/> Objective Category: Expanded Economic Opportunities Which includes:	<input checked="" type="checkbox"/> Objective Category: Expanded Economic Opportunities Which includes:
<input checked="" type="checkbox"/> assisting homeless persons obtain affordable housing	<input checked="" type="checkbox"/> improving the safety and livability of neighborhoods	<input type="checkbox"/> job creation and retention
<input checked="" type="checkbox"/> assisting persons at risk of becoming homeless	<input checked="" type="checkbox"/> eliminating blighted influences and the deterioration of property and facilities	<input checked="" type="checkbox"/> establishment, stabilization and expansion of small business (including micro-businesses)
<input checked="" type="checkbox"/> retaining the affordable housing stock	<input checked="" type="checkbox"/> increasing the access to quality public and private facilities	<input checked="" type="checkbox"/> the provision of public services concerned with employment
<input checked="" type="checkbox"/> increasing the availability of affordable permanent housing in standard condition to low-income and moderate-income families, particularly to members of disadvantaged minorities without discrimination on the basis of race, color, religion, sex, national origin, familial status, or disability	<input type="checkbox"/> reducing the isolation of income groups within areas through spatial de-concentration of housing opportunities for lower income persons and the revitalization of deteriorating neighborhoods	<input checked="" type="checkbox"/> the provision of jobs to low-income persons living in areas affected by those programs and activities under programs covered by the plan
<input type="checkbox"/> <input checked="" type="checkbox"/> increasing the supply of supportive housing which includes structural features and services to enable persons with special needs (including persons with HIV/AIDS) to live in dignity and independence	<input type="checkbox"/> restoring and preserving properties of special historic, architectural, or aesthetic value	<input type="checkbox"/> availability of mortgage financing for low income persons at reasonable rates using non-discriminatory lending practices
<input type="checkbox"/> providing affordable housing that is accessible to job opportunities	<input type="checkbox"/> conserving energy resources and use of renewable energy sources	<input type="checkbox"/> access to capital and credit for development activities that promote the long-term economic social viability of the community

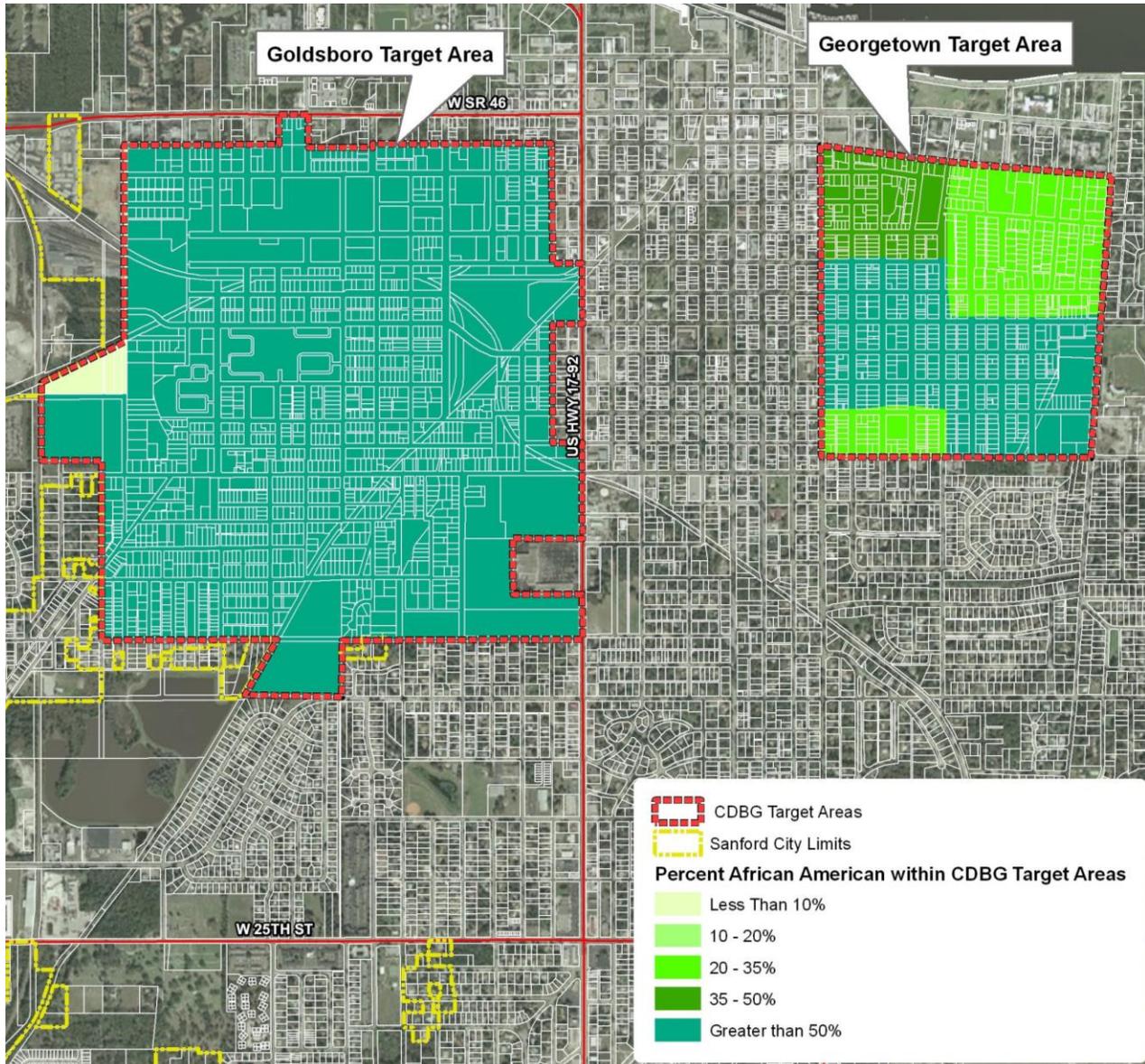
9. Describe the outcome measures for activities in accordance with Federal Register Notice dated March 7, 2006, i.e., general objective category (decent housing, suitable living environment, economic opportunity) and general outcome category (availability/accessibility, affordability, sustainability)

<i>Activity</i>	<i>Objective</i>	<i>Outcome Category</i>	<i>Outcome Indicator</i>	<i>Outcome Measure</i>
<i>Healthy living workshops</i>	Suitable Living Environment	Availability Accessibility	#of persons assisted with new or improved access to a service	100P
<i>Services for at risk Youth</i>	Suitable Living Environment	Availability/ Accessibility	# of persons assisted with new or improved access to a service	250P
<i>Clearance and Demolition</i>	Suitable Living Environment	Sustainability	# lots cleared/ available for Safe and decent housing	2U
<i>Special Economic Development Assistance and Building Improvements</i>	Economic Opportunity	Sustainability	# of persons assisted with new or improved access to a service	0B
<i>Home Rehabilitation</i>	Decent Housing	Affordability	# of houses rehabilitated to maintain safe, sanitary, and decent housing stock	11H
<i>Public Facilities</i>	Suitable Living Environment	Sustainability	# of linear feet of sidewalks, curbs, sewer, and waterlines installed	2,000 ft.

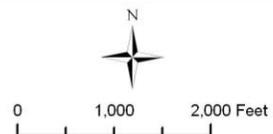
Geographic Distribution/Allocation Priorities 91.220(d) and (f)

10. Describe the geographic areas of the jurisdiction (including areas of low-income families and/or racial/minority concentration) in which assistance will be directed during the next year. Where appropriate, the jurisdiction should estimate the percentage of funds the jurisdiction plans to dedicate to target areas.

Map 5 below indicates the highest concentration of racial/minority concentration of the African-American population, which is predominately located in the two target areas consisting of Goldsboro and Georgetown.

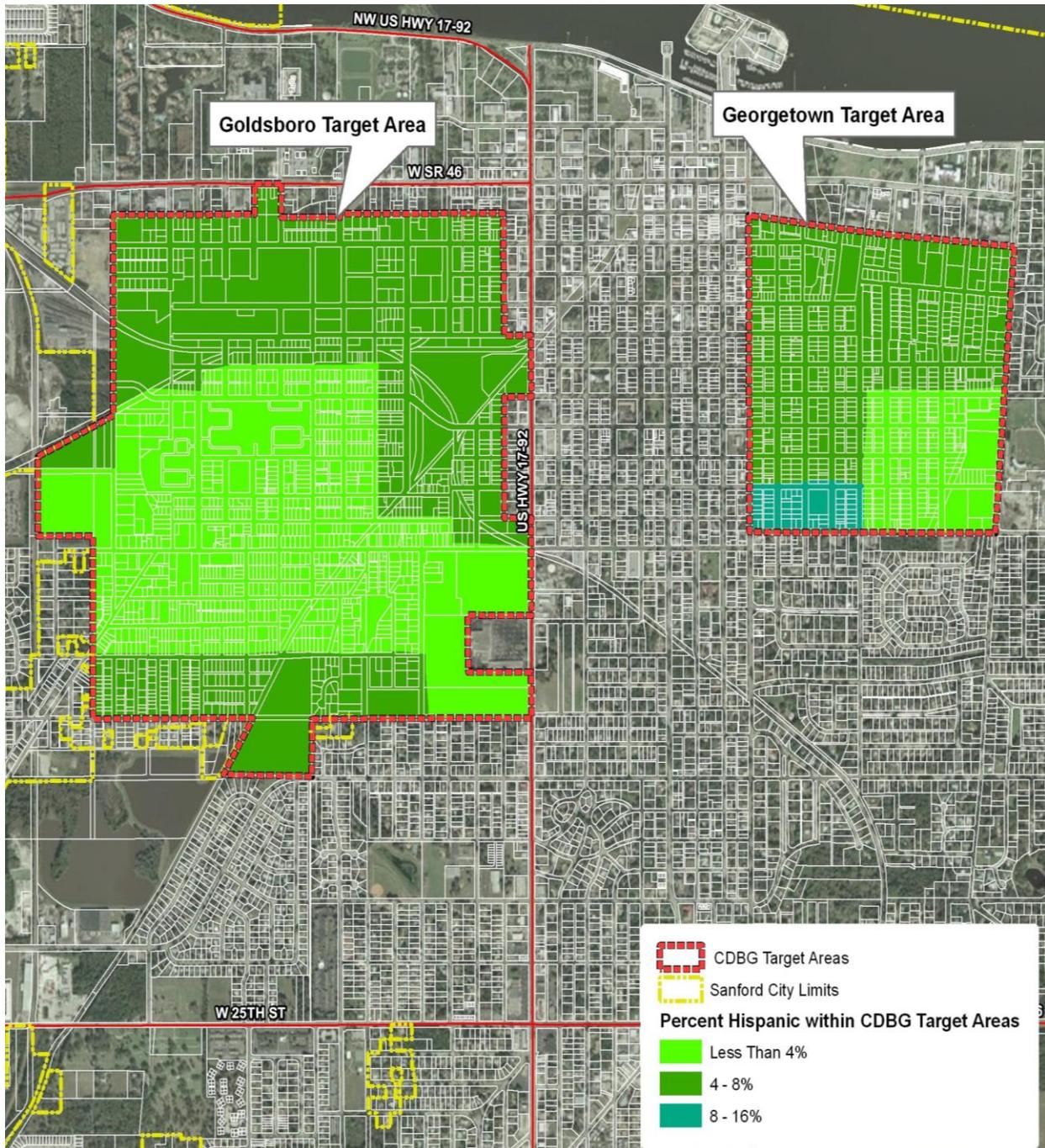


**Map 5: City of Sanford
Consolidated Plan 2010 -2014
Percent African American by
Block Group within the CDBG Target Areas**

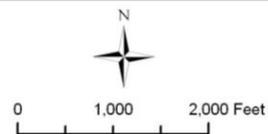


Prepared By
CPH Engineers and
Choice Consulting
Services L.L.C.
July 2010
Data Based on
U.S. Census 2000

Map 6 below indicates the highest concentration of racial/minority concentration of the Hispanic population, which has a high predominance in the two target areas consisting of Goldsboro and Georgetown.



Map 6: City of Sanford Consolidated Plan 2010 -2014
Percent Hispanic by Block Group within the CDBG Target Areas



Prepared By
 CPH Engineers and
 Choice Consulting
 Services L.L.C.
 July 2010
 Data Based on
 U.S. Census 2000

The following funded activities are located in geographic target areas of Sanford known as Goldsboro and Georgetown which are characterized by predominantly lower income populations and predominantly minority populations (see Maps 3 and 4 below)

- *Mentoring & After School Program* Goldsboro target area of Sanford-Map #3
- *Clearance & Demolition* Activity will be concentrated in the targeted areas
- *Community Gardening* Georgetown and Goldsboro
- *Public Facilities* Goldsboro and Georgetown
- *Housing Rehabilitation* Goldsboro and Georgetown

Goldsboro (Map 3) and Georgetown (Map 4) other areas may be considered as well. Data based on U.S. Census 2000 and 2009 website <http://factfinder.census.gov>.



Map 3: City of Sanford Consolidated Plan 2010 -2014 Goldsboro CDBG Target Area

 Goldsboro CDBG Target Area
 Sanford City Limits


 0 500 1,000 Feet
 Prepared By CPH Engineers and Choice Consulting Services L.L.C. July 2010 Data Based on U.S. Census 2000



Map 4: City of Sanford Consolidated Plan 2010 -2014 Georgetown CDBG Target Area

 Georgetown CDBG Target Area
 Sanford City Limits


 0 500 1,000 Feet
 Prepared By
 CPH Engineers and
 Choice Consulting
 Services L.L.C.
 July 2010
 Data Based on
 U.S. Census 2000

The following activities are offered on a citywide basis to income-eligible households and are not limited to any specific geographic areas; preference will be given to residents of the primary target area.

- *Home Improvements (80% within the target area and 20% citywide)*
- *Services for Youth*

In its fourth year as an entitlement City, Sanford has programmed and dedicated 86.8% of its CDBG allocation to the target areas of the City, and will expend over 96% of the non-administrative portion of the grant in support of low and moderate-income residents.

Census Tract Data for Targeted Areas

PLACE NAME	CENSUS TRACT NUMBER	BLOCK GROUP NUMBER	LOW/MOD POPULATION	LOW/MOD UNIVERSE	LOW/MOD PERCENTAGE
City of Sanford	020101	1	539	707	76
City of Sanford	020101	2	457	827	55
City of Sanford	020102	2	298	414	72
City of Sanford	020102	3	293	509	58
City of Sanford	020102	4	285	463	62
City of Sanford	020201	2	277	470	59
City of Sanford	020202	3	606	1006	60
City of Sanford	020202	4	727	1322	55
City of Sanford	020302	1	1324	2094	63
City of Sanford	020401	1	504	819	62
City of Sanford	020401	2	537	683	79
City of Sanford	020500	1	525	681	77
City of Sanford	020500	2	1491	1925	78
City of Sanford	020500	3	204	282	72
City of Sanford	020500	4	843	979	86
City of Sanford	020600	2	33	33	100
City of Sanford	020806	1	704	1117	63
City of Sanford	020901	5	2293	3402	67
City of Sanford	020902	1	485	778	62
City of Sanford	020902	2	894	1502	60
City of Sanford	021000	1	67	120	56

11. Describe the reasons for allocation priorities, the rationale for allocating investments geographically with the jurisdictions during the next year, and identify the obstacles to addressing un-served needs.

The census tract data provides the specific data used to identify and target low-income households and neighborhoods. The maps and narrative above provide detailed information concerning Sanford’s most needy households. On average the percentage of the low/moderate income population for the census tracts in the target areas is 67%. With such a high percentage of low/moderate income residents combined with an antiquated infrastructure and minimal social services, these neighborhoods require a high level of public services and infrastructure improvements. Therefore, the projects selected for the fourth year and the goals, objectives, and future projects identified for next year will be heavily focused on activities to improve the quality of life for residents in the target areas.

Obstacles to meeting underserved needs

The major obstacle to meeting the City’s underserved needs will continue to be the lack of and reduction in financial resources, including Federal (HOME) and State (SHIP) support. Local

resources have lessened significantly recently due to reduced ad valorem and to the current lingering recession. The lack of available developable, vacant, residentially zoned land will continue to put constraints on the City's ability to provide affordable housing. Although housing prices have decreased significantly due to the high foreclosure rate, many low-moderate income households are currently priced out of ownership due to unemployment and under employment.

Annual Affordable Housing Goals 91.220(g)

***If not using the CPMP Tool:** Complete and submit Table 3B Annual Housing Completion Goals.

***If using the CPMP Tool:** Complete and submit the Table 3B Annual Housing Completion Goals.

12. *Describe the one-year goals for the number of homeless, non-homeless, and special-needs households to be provided affordable housing using funds made available to the jurisdiction and one-year goals for the number of households to be provided affordable housing through activities that provide rental assistance, production of new units, rehabilitation of existing units, or acquisition of existing units using funds made available to the jurisdiction. The term affordable housing shall be defined in 24 CFR 92.252 for rental housing and 24 CFR 92.254 for homeownership.*

Based on citizens' participation survey results and the regular community meetings, the City is providing funding to assist with affordable housing through our Immediate Needs - Minor Rehabilitation Program. During the FY the goal is to assist eleven homeowners.

Public Housing 91.220(h)

13. *Describe the manner in which the plan of the jurisdiction will help address the needs of public housing and activities it will undertake during the next year to encourage public housing residents to become more involved in management and participate in homeownership.*

The City will continue to work with the Sanford Housing Authority and the Orlando Housing Authority during the 2014-2015 Program Year. The City will continue provide staff support where necessary to assist the Sanford Housing Authorities in their efforts to negotiate the demolition of the existing housing and redevelopment of workforce affordable housing with HUD. Currently the City is working with SHA on the submission of a Choice Neighborhood Initiative Grant.

14. *If the public housing agency is designated as "troubled" by HUD or otherwise is performing poorly, the jurisdiction shall describe the manner in which it will provide financial or other assistance in improving its operations to remove such designation during the next year.*

Both Public Housing Authorities (PHA's) in the County (the Seminole County Housing Authority and the Sanford Housing Authority) have Section 8 vouchers. The Seminole County Housing Authority manages thirty units and the Sanford Housing Authority manages six units. The Sanford Housing Authority has been removed from the "troubled" designation list.

Under the management of the Orlando Housing Authority, the Sanford Housing Authority has made significant progress over the past two years. This includes:

- Successfully relocating 474 families from the six public housing sites;
- Applying for and receiving Emergency Natural disaster Grants for the relocation of the tenants
- Securing funds to complete the demolition of the six sites;
- Paying off the loan on the property
- Retained a consultant to design and implement a strategic planning process
- Pursuing a Choice Neighborhood Grant

	Sanford Housing Authority	Seminole County Housing Authority
Current No. of Section 8 tenants	0	368
Households on Section 8 waiting list	0	480
Current No. of Public Housing units	6	30
Households on Public Housing waiting list	146	294
Est. need for additional rental assistance	0	\$3,000,000
Est. funding need for additional units	0	N/A
Est. need for down payment assistance for Public Housing residents	0	2,500

Each of the two Public Housing Authorities have at least one public housing resident on their Board of Commissioners. The Seminole County Housing Authority also has an Advisory Board made up of public housing residents. The Advisory Board meets quarterly to help in their strategic planning and development of their Annual Plan. The Sanford Housing Authority has a Resident Advisory Board that meets twice annually to advise on their Annual Plan and to give updates on the PHA’s capital fund. The City of Sanford has assigned a senior staff person and one City Commissioner to act as liaisons between SHA administration and the City in an effort to keep all lines of communication open.

Homeless and Special Needs 91.220(i)

15. Describe, briefly, the jurisdiction’s plan for the investment and use of available resources and describe the specific planned action steps it will take over the next year aimed at eliminating chronic homelessness.

Sanford officials recognize the seriousness of homelessness within the City. With limited CDBG funds available to the City to pursue its own needs, priorities, objectives and goals, the City does not have the CDBG financial capability to address homeless needs on a large scale. The City of Sanford did not allocate any funds for FY 2014-2015 in support of a supportive services project for homeless individuals. The City of Sanford will continue to work with the Homeless Task Force to identify and implement a day drop in center program for the homeless population.

The following Homeless programs are presently funded and are active projects/activities within Seminole County, but most importantly in Sanford: The Supportive Housing Program (delivered

by the Homeless Services Network of Central Florida through the Continuum of Care), The Shelter Plus Care Program (through Seminole County), The Emergency Shelter Grant Program (through Seminole County) and Housing Opportunities for Persons with AIDS (through the City of Orlando-designated as program administrator for all residents in Seminole County, Orange County, Osceola County, and the City of Orlando).

In addition, from its ESG Program, the County funds assistance to two local emergency homeless shelters which includes: The Safe House of Seminole - a local shelter for victims of domestic violence for operation and maintenance expenses, and Rescue Outreach Mission, - homeless men's shelter and its homeless women's and children's shelter for operation and maintenance expenses (located in the Goldsboro target area). The City of Sanford allocated funds from prior years through amendments to assist with the expansion of the Rescue Outreach Mission. The assistance allows the shelters to assist a greater number of homeless individuals and families. Each shelter also has transitional housing programs to provide longer-term shelter while assisting homeless individuals and families to gain self-sufficiency (job training, education, etc.), and to eventually procure market housing.

During the past year Seminole County initiated funding for the for the Homes for the Homeless and Homes First program.

Other federal partners that also provide homeless assistance include: the Department of Health and Human Services, the Department of Education, the Department of Labor, the Department of Veterans Affairs, the Department of Agriculture, and the Interagency Council on Homelessness.

16. *Describe specific action steps to address the needs of persons that are not homeless identified in accordance with 91.215(e).*

While the City of Sanford does not directly receive State of Florida SHIP Funds, its income eligible residents are encouraged to apply for assistance under the Seminole County Housing Programs. Special needs populations, which include the elderly, frail, physically disabled, families and persons experiencing economic downturns, are at the greatest risk of not being able to retain decent affordable housing or becoming homeless. Currently Seminole County has four reconstruct houses going in the City of Sanford.

17. *Homelessness Prevention-Describe planned action steps over the next year to address the individual and families with children at imminent risk of becoming homeless.*

Seminole County is taking the lead on prevention of homelessness for over 1,800 homeless children in its jurisdiction. During the last three program years, the County has partnered with agencies and organizations funded through the Continuum of Care of Central Florida for supportive housing programs and homeless prevention services.

With its limited CDBG funds, the City will not be able to take a major role as sole source provider. The City will continue to consider services and projects that support homeless prevention on a case-by-case basis.

Resource Services of Central Florida’s transitional housing project and other regional and county programs are available for special needs population and “at risk persons” to avail themselves of housing opportunities support and job training services to ensure higher and more satisfying quality of life.

Barriers to Affordable Housing 91.220(j)

18. Describe the actions that will take place during the next year to remove barriers to affordable housing.

The Sanford Comprehensive Plan Housing Element Section raises the following comments concerning potential barriers to affordable housing within the City limits “Potential Impediments to Meeting Demand”. The potential hurdles include limited funding for affordable housing, implementation of policies promoting urban infill, redevelopment, and development regulations, which make housing development more expensive. The City Commission does have the power to waive, discount, or defer impact fees for affordable housing. These programs should be reviewed for successful and potential improvement in the development of affordable housing.

During year four, the City of Sanford will be preparing its Fair Housing Analysis of Impediments to include a Fair Housing Planning Guide.

Other Actions 91.220(k)

19. Describe the actions that will take place during the next year to address obstacles to meeting underserved needs, foster and maintain affordable housing, evaluate and reduce the number of housing units containing lead-based paint hazards, reduce the number of poverty-level families develop institutional structure, enhance coordination between public and private agencies (see 91.215(a), (b), (i), (j), (k), and (l)).

Addressing Obstacles to Meeting Underserved Needs

The City of Sanford will fund the following programs to address obstacles in meeting unmet or underserved needs:

- Support services for senior citizens, homeless and special needs groups
- Increasing public safety and the general welfare of the residents in the target areas
- Support services for youth
- Employment & training for youth
- Home improvement-homeowner occupied minor rehabilitation
- Special economic development to retain and enhance business in the target areas

The City has also fostered vital partnerships with Seminole County and area wide agencies to address the needs of its residents who are underserved, in need of decent and safe housing and supportive services.

Seminole County housing programs provide the following benefits to City low-income residents through their State Housing Initiative Partnership (SHIP).

- Homeownership counseling is provided to all households approved for SHIP ownership assistance. Counseling is provided pre and post-purchase, with specific focus on household budgeting, home maintenance, and foreclosure prevention.

- A Foreclosure Prevention Program is funded annually under the SHIP Program to assist very low and low-income households when facing foreclosure. Up to \$5,000 is provided to assist with mortgage arrears and to prevent foreclosure for salvageable mortgages.

Additional Agencies providing local housing assistance include:

1. Habitat for Humanity in Seminole County
2. GoldenRule Housing & Community Development Corporation (specializing in affordable housing for lower income people)
3. Rescue Outreach Mission (men's shelter / women's and children's homeless shelter)
4. Housing Authority of the City of Sanford (public housing)
5. Brothers Keepers, Inc.(a substance abuse non-profit service organization)
6. Recovery House of Sanford (transitional housing for men recovering from alcohol and drug addiction)
7. The Center for Affordable Housing (non-profit CHDO of Seminole County)
8. Seminole County Bar Association Legal Aid Society

Reducing the Number of Poverty level Families

One of the greatest challenges facing the City of Sanford is reducing the number of poverty level households/families particularly in the primary target areas of Goldsboro and Georgetown. The City of Sanford overall percentage of individuals below the poverty level is almost twice that of Seminole County (18.5% vs. 9. 8%). A disproportioned number of the 18.5% of individuals at or below the poverty level live in the target areas, approximately 67% of the residents.

Although closed now, the City's six public housing complexes are located in the two target areas (five in Goldsboro and one in Georgetown). Both neighborhoods consist of a high concentration of seniors, single mothers, high unemployment, individuals with criminal records and individuals with few marketable/employable skills. Combining the social human services factors of the residents in the neighborhoods with the lack of commercial and economic development in the areas; the opportunity for individuals to improve their station in life under the current circumstances is virtually impossible.

To reduce the number of families and households at poverty level in the target areas, going forward the City will be the catalyst for commercial and economic redevelopment in the target areas. In recognition of the social, physical and infrastructure needs of the target areas, CDBG funds will be used to leverage private and other public funding to improve the living conditions and stabilize the neighborhoods. Pursuant to this commitment projects proposed for year one and year two that were not implemented, the majority of those funds have been reallocated to the aforementioned activities.

Private Industry

The housing delivery system in Sanford has traditionally been the domain of both the public and private sectors. A robust residential market, particularly for suburban single-family construction, spurred growth of the development community until 2007, when the economy downturned. The projected number of households residing in the City is expected to grow at a much reduced rate by 2015 as evidenced by the widespread housing slump and foreclosure vacancy rates. The City

will continue to encourage private and public partnerships in the provision of affordable housing for Sanford.

Nonprofit Organizations

There is a small number of nonprofits operating within Sanford for the express purpose of providing social and community development services. The City values these partnerships and takes an active interest in the service delivery to its citizens. As stated earlier, the primary social service provider to Sanford citizens is the countywide Meals on Wheels Program. Types of services offered include congregate meals, social programs, housing repair (Weatherization Program), transportation (for the disabled and senior citizens), nutrition (food bank and commodities), home services (personal care, homemaking, companionship, etc.), as well as toddler, preschool and afterschool nutrition program. This organization greatly assists in filling the gap of services for the City's highest risk population.

The Homeless Services Network of Central Florida works with homeless service agencies, advocacy groups and other interested individuals to provide grant application funding in the support of activities for the homeless. This coalition offers all nonprofits who serve the homeless population the opportunity to share information and resources and to coordinate activities in a manner that best meets the needs of their client population in a continuum of care.

The Seminole County Health Department has no tracking process for lead-based paint. It is estimated that approximately 36 % (8,635) of the housing units in Sanford were built prior to 1978. Although it is possible that a majority of these contain residual lead-based paint, many have undoubtedly been repainted many times over, and have therefore have encapsulated any lead-based paint.

The overall goal of the City is to reduce or eliminate lead-based paint hazards and prevent childhood lead poisoning. This will be accomplished through a coordinated effort of public and private sectors. All housing proposed for rehabilitation is screened by the year built to determine possible LBP hazard. The owner is given the EPA Fact Sheet - *Identifying Lead Hazards in Your Home* and the EPA publication - *Protect Your Family from Lead in Your Home*. During the feasibility inspection, if the inspector identifies a potential LBP problem, he notifies the owner and may test the suspect area with a swab or take a sample to be processed through the County Health Department.

In every program where federal funds are expended on a housing unit, the City incorporates the current procedures for hazard reduction or LBP abatement guidelines as defined in 24 CFR Part 35.

Actions proposed or being taken to evaluate and reduce lead-based paint hazards

Due to funding limitations the City, in conjunction with Seminole County occasionally funds and subsidizes City based affordable housing development. This is accomplished through the encouragement and development of new affordable units, or the rehabilitation of existing units built after 1977, as opposed to rehabilitating pre-1978 units, both for renters and homebuyers, in order to increase the inventory of lead-free housing units. However, since the City and or Seminole County also accepts and occasionally funds proposals to renovate existing housing units (sometimes built prior to 1978), all housing units built prior to 1978 will be comprehensively tested for lead-based paint. If such units contain lead-based paint and are

approved for funding, they will begin the process of encapsulating, abating, or clearing the lead-based paint. Housing units with chipped or peeling lead-based paint will be avoided to the extent feasible and possible, due to the anticipated expense, and owners of such units will be encouraged to eliminate any hazards. In all situations, the City will comply with Federal Regulations (24 CFR 35) in dealing with lead-based paint in residential properties. Any treatment or abatement of lead-based paint will be funded by participating agencies, but closely monitored by the City and Seminole County.

20. *Describe the actions to coordinate its housing strategy with local and regional transportation planning strategies to ensure to the extent practicable that residents of affordable housing have access to public transportation.*

Transportation services are provided by LYNX, a state funded bus service on a tri-county basis (Seminole, Orange, and Osceola) including the city of Sanford.

PROGRAM SPECIFIC REQUIREMENTS

CDBG 91.220(I)(1)

1. *Identify program income expected to be received during the program year, including:*
 - *amount expected to be generated by and deposited to revolving loan funds;*
 - *total amount expected to be received from each new float-funded activity included in this plan; and*
 - *amount expected to be received during the current program year from a float-funded activity described in a prior statement or plan.*

No Program Income is anticipated for FY 2010-2011.

2. *Program income received in the preceding program year that has not been included in a statement or plan.*

Not applicable, 2010 is the first year for the City as an entitlement jurisdiction.

3. *Proceeds from Section 108 loan guarantees that will be used during the year to address the priority needs and specific objectives identified in its strategic plan.*

Not applicable, the City does not have a Section 108 Program.

4. *Surplus funds from any urban renewal settlement for community development and housing activities.*

Not applicable

5. *Any grant funds returned to the line of credit for which the planned use has not been included in a prior statement or plan.*

Not applicable

6. *Income from float-funded activities*

Not applicable

7. *Urgent need activities, only if the jurisdiction certifies.*

The City does not have any Urgent Need Activities

8. *Estimated amount of CDBG funds that will be used for activities that benefit persons of low- and moderate income*

The City of Sanford estimates that 76% of its CDBG funds will be used for direct activities to benefit low-moderate income persons. 4.6% will be used for slum and blight removal and 20% percent will be used for planning and administration for the CDBG program, which indirectly benefit the low to moderate income persons its serves. It is anticipated that a grand total; 96% of the CDBG grant will benefit low-moderate income persons.

HOME 91.220(I) (1) and/or HOPWA 91.220(I) (3)

The City of Sanford does not receive HOME 91.220(I) (1) or HOPWA 91.220(I) (3) funding.

MONITORING

Monitoring (91.230)

Describe the standard and procedure the jurisdiction will use to monitor its housing and community development projects and ensure long-term compliance with program requirements and comprehensive planning requirements.

One Year Strategic Plan Monitoring Response:

Monitoring:

1. Describe the standard and procedures that will be used to monitor activities carried out in furtherance of the plan.

With the assistance of the newly established CDBG Advisory Board, all proposed activities will be vetted and evaluated using the Five-Year Consolidated Plan as the bench mark. Each proposed activity will be reviewed by the Advisory Board, presented to the community for comment and finalized by the Advisory Board for recommendation to the City Manager and the City Commission for approval. Projects that are advertised through Request for Proposals will be screened by staff; proposals meeting the criteria will be evaluated and ranked by the Advisory Board and submitted to the City Manager and City Commission for approval.

2. Describe the action to be taken by the grantee to monitor its performance in meeting its goals and objectives set forth in its Consolidated Plan.

The Advisory Board will be briefed on the Consolidated Plan as well as the Sunshine Law. The briefing will include the goals and objectives in the plan and accomplishments to date. For those activities that are behind schedule, a special emphasis will be placed on them. The CDBG program will be required to submit quarterly reports to the Deputy City Manager and the Advisory Board.

In addition, the City has contracted with Seminole County to monitor program and prepare required reports.

3. Describe steps/actions being taken to insure compliance with program requirements, including requirements involving the timeliness of expenditure, minority business outreach and compressive planning requirements.

CDBG staff is participating in webinars and live trainings to enhance their knowledge of CDBG requirements and program protocol and procedures. Based on the experience of the past three years, the CDBG program staff will work very closely with Seminole County in the selection of projects and activities going forward to insure the Subrecipient's have the financial resources and capacity to plan and implement the proposed activity. The City has contracted with Seminole County to administer the CDBG. City staff will still be actively involved in the planning and activity selection process.

In the future, activities and projects that are slow performers will be identified early; and if corrective actions do not produce results, the programs will be placed on notice. If no improvements occur following the notice the project will be defunded and funds reallocated.

To maintain contact with the minority businesses and community in general, the CDBG program will continue to participate in regular community meetings held by the City. The CDBG Advisory Board meetings will be open to the community with time set aside on the agenda for citizens' participation.

4. Describe steps/actions to be used to ensure long-term compliance with housing codes, including any actions or on-site inspections it plans to undertake during the program year.

In the contract with Seminole County, the County will monitor and evaluate projects. The process will involve quarterly activity reporting, telephone contacts, written communication, analysis of reports and audits, on site visits and meetings when applicable with project staff. The primary goal of monitoring will be to test capacity, identify deficiencies, and advocate for modifications to improve, reinforce or augment the project's performance. Internal and external agencies and departments will be subject to this review. As part of this process, the City will watch for evidence of fraud, waste and mismanagement or for situations with potential for such abuse. The emphasis will be on prevention, detection and correction of problems to ensure program success.

The County will be monitored using the HUD HOME Monitoring Check List forms.

This proactive approach in the project management process will serve to identify timelines and successful performance as well as identify the potential of a problem or problems allowing intervention by staff to mitigate deficient performance.

5. Describe actions to be taken by grantee to monitor Subrecipients.

Under the contract with Seminole County they will be monitoring each project monthly or more frequently if circumstances should require (high risk activities, new sub-recipient, high turnover within organizations, etc.), in order to review the scope of services terms included in their agreement with the City, and to determine the possibility of future fundings. The purpose of this monitoring is to measure compliance with requirements of the HUD program. Such review will include desk audits and on-site examinations.

In addition to the above, any Subrecipient determined to be in need of and/or requesting additional training on how to meet grantee and federal requirements will receive technical assistance in the form deemed most appropriate to the circumstances by department staff.