



City of Anniston

2018 Consolidated Annual Performance
Evaluation Report (CAPER)
October 1, 2018 - September 30, 2019

Prepared for Submission to the U.S. Department of Housing & Urban Development

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CR-05 - Goals and Outcomes

Progress the jurisdiction has made in carrying out its strategic plan and its action plan.

91.520(a)

In accordance with the federal regulations found in 24 CFR 570, the City of Anniston has prepared this Consolidated Annual Performance and Evaluation Report (CAPER) for the period of October 1, 2018, to September 30, 2019. The CAPER presents the County's progress in carrying out projects and activities pursuant to the Program Year (PY) 2018 Annual Action Plan for the Community Development Block Grant (CDBG) and HOME Investment Partnerships (HOME) funds received from the United States Department of Housing and Urban Development (HUD) to principally benefit low-to-moderate-income individuals in the City.

The 2018 CAPER describes and evaluates how the City invested formula funds from HUD to meet affordable housing and community development needs. This annual report also provides a general assessment of the City's progress in addressing the priorities and objectives contained in its Five-Year 2018-2022 Consolidated Plan (Con Plan). The 2018 CAPER and other pertinent documents may be accessed through the City's website at <http://www.anniston.al.gov/pages/?pageID=56>.

The City of Anniston continues to make progress with CDBG and HOME funds by increasing affordable housing assistance for low and moderate-income persons and allocating CDBG to local non-profit organizations to provide essential social services for the homeless, LMI persons, and non-homeless special needs population and HOME funds for sustainability of affordable rental housing. The City of Anniston identified the following goals during PY2018:

1. Provide decent and affordable housing and supportive services for low and moderate-income families
2. Improve public facilities and/or infrastructure
3. Eliminate slums and blight

The City of Anniston received **\$550,805.00** in CDBG funding and **\$452,462.00** in CDBG funding for 2018. The City expended a total of **\$557,217.49** for the following CDBG eligible activities: clearance and demolition (\$143,852.60), single-family rehabilitation (\$235,592.89), facility improvements to parks and recreational centers (\$31,986.26), public service activities (\$83,315.72) and general administration (\$62,472.00).

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	Category	Source / Amount	Indicator	Unit of Measure	Expected – Strategic Plan	Actual – Strategic Plan	Percent Complete	Expected – Program Year	Actual – Program Year	Percent Complete
Eliminate Slums & Blight	Public Housing	CDBG: \$143,852.60	Buildings Demolished	Buildings	10	10	25.00%	10	15	100.00%
Expand affordable housing opportunities	Affordable Housing	HOME: \$	Rental units constructed	Household Housing Unit	0	0	0%	5	0	0.00%
Expand affordable housing opportunities	Affordable Housing	HOME: \$	Rental units rehabilitated	Household Housing Unit	0	0	0%	5	0	0.00%
Expand affordable housing opportunities	Affordable Housing	HOME: \$	Homeowner Housing Added	Household Housing Unit	5	0	0.00%	5	0	0.00%
Improve access to and quality of housing	Affordable Housing	CDBG: \$235,592.89	Homeowner Housing Rehabilitated	Household Housing Unit	20	15	75.00%	20	15	75.00%
Planning and administration	Planning and Administration	CDBG: \$62,472.00/ HOME: \$	Other	Other	1	0	0%	1	1	100.00%
Provide public services	Non-Housing Community Development	CDBG: \$82,450.51	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	500	116	23.20%	0	549	100.00%
Provide public services	Non-Housing Community Development	CDBG: \$	Public service activities for Low/Moderate Income Housing Benefit	Households Assisted	0	0	0%	0	0	0.00%
Public Facility Improvements in Low-Mod Areas	Non-Housing Community Development	CDBG: \$31,986.26	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	Facilities Assisted	0	2	0%	2	2	100.00%

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 of Anniston's Community Development Department maintains partnerships with local nonprofits providing essential services for low-income households as well as with other City departments to assess progress, provide extensions where necessary, and reallocate unused funds where necessary. The City continues to make progress on meeting our stated goals and objectives from the Action Plan and the Consolidated Plan. During FY2018, the City accomplished the following activities:

- Demolished 16 vacant and abandoned housing units
- Employed 12 youth from low-income households for job training and mentorships
- Implemented homeowner rehabilitation program and assisted 15 low-income households
- Provided financial assistance to St. Micheals to improve health care services for low-income households
- Provided financial assistance to Community Enabler Developer for emergency food assistance and school supplies.
- Provided financial assistance to World Changers to assist 5 low-income homeowners with housing rehabilitation.
- Provided financial assistance to Interfaith Ministries for emergency rental subsidies, utility assistance, and identification services.

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
White	288	0
Black or African American	261	0
Asian	0	0
American Indian or American Native	0	0
Native Hawaiian or Other Pacific Islander	0	0
Total	549	0
Hispanic	0	0
Not Hispanic	549	0

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

Narrative

The table above lists the numbers of beneficiaries by race and ethnicity assisted with HUD-Funded programs in 2018. The numbers reported for ethnicity do not reflect the same count as the total number reported by race. The variances could be attributed to the refusal of information, errors at intake or unwillingness to share information about ethnicity and/or race.

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	\$560,805	\$557,217.49
HOME	public - federal	\$482,462	\$0.00

Table 3 - Resources Made Available

Narrative

Identify the geographic distribution and location of investments

Target Area	Planned Percentage of Allocation	Actual Percentage of Allocation	Narrative Description
Anniston/Citywide	80	80	Entitlement Community

Table 4 – Identify the geographic distribution and location of investments

Narrative

The City distributes funding based on its geographic regions with populations in need of affordable housing options to allocate CDBG and HOME resources to assist various communities throughout Anniston and Calhoun County.

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 was to address the needs identified in the plan.

Although the CDBG program does not require matching funds, CDBG funds are typically leveraged through various private and public sources for the CDBG projects undertaken in 2018. Subrecipients that received CDBG funding also received funding from federal, state, local, and other resources. HOME funds were leveraged through the use of gap financing.

Developers identified and secured primary funding sources prior to allocations being awarded. These HOME funds were leveraged and matched with private lenders, sponsorship contributions from individuals, churches, clubs, and businesses; local public housing authority funding; in-kind donations; and private donations. In FY2018, the City of Anniston was granted a match reduction waiver due to fiscal distress, severe fiscal distress, and Presidential disaster declarations. The City of Anniston satisfied both of the HUD distress criteria: local jurisdiction is determined to be in severe fiscal distress and receives a 100 percent reduction of the match. As such, the City of Anniston did not have a matching liability in FY2018, per HUD IDIS Report PR33.

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

Table 5 – Fiscal Year Summary - HOME Match Report

Match Contribution for the Federal Fiscal Year								
Project No. or Other ID	Date of Contribution	Cash (non-Federal sources)	Foregone Taxes, Fees, Charges	Appraised Land/Real Property	Required Infrastructure	Site Preparation, Construction Materials, Donated labor	Bond Financing	Total Match
\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0

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 \$
\$99,133.24	\$29,599.18	\$2,133.32	\$750.00	\$130,850.26

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	10	0	0	0	1	9
Dollar Amount	\$205,905	\$0	\$0	\$0	\$26,460.00	\$179,445
Sub-Contracts						
Number	5	0	0	0	0	0
Dollar Amount	\$39,545	\$0	\$0	\$0	\$0	\$0
	Total	Women Business Enterprises	Male			
Contracts						
Number	10	0	10			
Dollar Amount	\$205,905	\$0	\$205,905			
Sub-Contracts						
Number	0	0	0			
Dollar Amount	\$0	\$0	\$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	0	0	0	0	0
Dollar Amount	\$0	\$0	\$0	\$0	\$0	\$0

Table 9 – Minority Owners of Rental Property

Relocation and Real Property Acquisition – Indicate the number of persons displaced, the cost of relocation payments, the number of parcels acquired, and the cost of acquisition						
Parcels Acquired		0		0		
Businesses Displaced		0		0		
Nonprofit Organizations Displaced		0		0		
Households Temporarily Relocated, not Displaced		0		0		
Households Displaced	Total	Minority Property Enterprises				White Non-Hispanic
		Alaskan Native or American Indian	Asian or Pacific Islander	Black Non-Hispanic	Hispanic	
Number	0	0	0	0	0	0
Cost	\$0	\$0	\$0	\$0	\$0	\$0

Table 10 – Relocation and Real Property Acquisition

CR-20 - Affordable Housing 91.520(b)

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

	One-Year Goal	Actual
Number of Homeless households to be provided affordable housing units	20	0
Number of Non-Homeless households to be provided affordable housing units	90	0
Number of Special-Needs households to be provided affordable housing units	50	0
Total	160	0

Table 11 – Number of Households

	One-Year Goal	Actual
Number of households supported through Rental Assistance	70	0
Number of households supported through The Production of New Units	50	0
Number of households supported through Rehab of Existing Units	20	0
Number of households supported through Acquisition of Existing Units	20	0
Total	160	0

Table 12 – Number of Households Supported

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

Discuss how these outcomes will impact future annual action plans.

Future Annual Action Plans will provide additional information on program changes that are currently in development as the City continues to determine the needs of residents in Anniston in Calhoun County.

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.

The City's Affordable Housing activity assisted a total of 17 families utilizing HOME funds through the Tenant-Based Rental Assistance Program for low-income rental households. The table below reflects the number of persons served in 2018 with CDBG and HOME funding throughout the City.

Number of Households Served	CDBG Actual	HOME Actual
Extremely Low-income	15	0
Low-income	0	2
Moderate-income	0	0
Total	0	0

Table 13 – Number of Households Served

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:

The City of Anniston works closely and frequently with the Homeless Coalition of Northeast Alabama (HCNEA) and many of the Continuum of Care's members to address service needs and enhance coordination among local service providers to address homelessness and the priority needs of homeless individuals and families, including homeless subpopulations. The Homeless Coalition of Northeast Alabama (HCNEA) and area service providers work collaboratively in the community to provide comprehensive mainstream services for residents of the City of Anniston and other areas. This partnership includes collaborative efforts of a variety of community groups, government agencies and a coalition of several homeless service providers.

These organizations provide many services to their clientele, including but not limited to counseling, case management, life skills training, financial literacy classes, and victim advocacy, all of which help residents to develop the skills and knowledge to transition into permanent supportive housing or independent living and to maintain steady employment. The ultimate goal of providing supportive services is self-sufficiency.

In 2018, the City of Anniston conducted a Point-In-Time Survey count of the city's homeless population. The count identified 146 homeless persons in total, 86 of whom were sheltered and 60 were unsheltered. The following characteristics were found in the homeless population:

- Chronically Homeless: 35 persons; representing 23% of the homeless population
- Homeless Unaccompanied Youth (Under 25) 13 individuals or about 8% percent of the homeless population.
- A total of 8 Homeless Unaccompanied Children (Under 18), which represents 5% of the total homeless population.
- Unaccompanied Young Adults (18-24) was 3 or 2% of the homeless population
- Homeless Veterans was 8, representing 5% of the homeless population.

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

Developing housing for homeless individuals is one of the most challenging aspects of affordable housing. Chronically homeless individuals need physical and mental health services in addition to housing which makes it extremely difficult for local providers to house homeless persons with the assurance that they will receive needed services in a timely and sufficient manner. In 2018, the City of Anniston utilized CDBG funding to provide assistance to nonprofits providing emergency rental assistance and transitional housing to homeless or at-risk of homelessness households.

Addressing the emergency shelter and transitional housing needs of homeless persons

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.

Public systems or institutions (i.e. jails, prisons, hospitals, child welfare, mental health facilities, etc.) often release individuals directly into homelessness. The Homeless Coalition coordinates release between the foster care system, health care, mental health care, and correctional facilities. For homeless families with children, a centralized intake is in place that seeks to mediate/prevent homelessness whenever possible, reduce the homeless episode for families through rapid rehousing and shelter/transitional housing focused on moving families from homelessness to permanent housing as soon as possible, and permanently house the most vulnerable families, as resources are available.

In an effort to assist families to avoid homelessness, the City of Anniston provided CDBG public services funds to Interfaith Ministries for rent, eviction assistance, temporary housing, utility disconnection assistance, utility reconnections, and utility deposits. The City with assistance from local housing and service providers has been committed to providing emergency and transitional housing for homeless persons.

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

The City continues to coordinate its homeless activities to prevent individuals and families from becoming homeless and help individuals/families regain stability in current housing or permanent housing through local nonprofit organizations.

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

Actions taken to address the needs of public housing

The City of Anniston and members of its consortia have four local housing authorities offering services to the community which allows services to be tailored to the needs of local residents. The City does not own or operate any housing units. The City of Anniston used its CDBG funding to partner with the Anniston Housing Authority to complete the construction of the Barber Terrace housing development.

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

Public housing residents are encouraged to provide input to their respective PHAs and are also invited to participate in the public engagement processes carried out by the City/Consortium. The City encourages Public Housing residents to learn about their Fair Housing rights and provides HUD Fair Housing materials to interested individuals.

Additionally, all four of Anniston's public housing authorities solicit resident input during the creation of their Annual Agency Plans and other long-range planning documents. They also provide meeting space and technical assistance to their Resident Advisory Boards as issues are identified.

Actions taken to provide assistance to troubled PHAs

There are no troubled PHAs in the City of Anniston or the other member cities of the Consortium.

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

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

The City of Anniston recently completed its first Assessment of Fair Housing in December 2017. This assessment is the successor to the former Analysis of Impediments to Fair Housing Choice which identifies barriers to affordable housing. The City implemented community strategies to increase opportunity measures in R/ECAPs by allocating CDBG funding for home repair and rehabilitation activities in R/ECAP tracts. The City also allocated CDBG and HOME funds for property acquisition and renovation in accordance with West Anniston Master Plan. Additionally, the city allocated funding for the demolition of unsafe and/or blighted structures in R/ECAPs.

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

The primary obstacle to meeting underserved needs is the limited resources available to address identified priorities. In addition, the gap in what households can afford to pay for housing and the price of housing is another obstacle to meeting the needs of the underserved. The City has some affordable housing stock, yet the income level for individual households such as single-parents, elderly disabled, or others of limited economic means is not sufficient to afford even the lowest of the market-rate units. In order for the City to shorten the gap between the costs associated with managing a household, both CDBG and HOME resources were used by community partners in an effort to address some of these needs.

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

The City of Anniston through its CDBG Homeowner Housing Rehabilitation Program requires an initial home inspection by a contracted HUD-certified inspector to test for lead and asbestos. Homeowners are notified if their property tests positive for lead or requires mitigation before completing homeowner rehab activities.

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

The City of Anniston attempted to reduce the number of poverty-level families by providing financial support to agencies that increased employment opportunities, reduced living costs, and increased job training. With the provision of CDBG and HOME funding, low-income families were assisted in becoming independent and self-sufficient. The City-funded agencies that serve children and youth from low-income families to provide a foundation for high educational achievement which is highly correlated with reduced poverty.

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

The City serves as the grantee and administrative agent for both the CDBG and HOME programs. The programs are housed within the Community Development Department and the day-to-day management

is provided by the Community Development Coordinator who reports to the City Manager. City personnel provides support for the administration of the program from the Finance Department, Engineering Division, Public Works Department, Code Enforcement Division, and Planning Department. Close cooperation among these City departments is essential to efficient program management and effective services for City/ACCHC residents. The City also maintains contacts with experienced Community Development consultants who advise and train staff and assist with the preparation of plans and reports.

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

The City uses multiple strategies to enhance coordination between agencies. This included the allocation of General Fund, Federal, and state dollars to support the provision of services within the covered jurisdictions, as well as ongoing communication and consultation with housing and non-housing service providers, public housing authorities, other local jurisdictions, and public agencies. In the HOME program, the City continues to maintain a productive relationship with its CHDO, Northeast Alabama CDC and the Housing Development Corporation in producing affordable housing units.

Additionally, the City used general fund funding which is outsourced and managed by the Community Foundation of Northeast Alabama; resulting in additional leveraged support

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

Barriers to affordable housing were identified in the City's most recent Assessment of Fair Housing This assessment is the successor to the former Analysis of Impediments to Fair Housing Choice which identifies. The City implemented community strategies to increase opportunity measures in R/ECAPs by allocating CDBG funding for home repair and rehabilitation activities in R/ECAP tracts. The City also allocated CDBG and HOME funds for property acquisition and renovation in accordance with West Anniston Master Plan. Additionally, the city allocated funding for the demolition of unsafe and/or blighted structures in R/ECAPs.

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

Each year, the City of Anniston's Community Development Department conducts an annual risk analysis to determine which grant activities are monitored for federal and local compliance. This risk analysis is conducted for every subrecipient expending funding during the program year. All risk analysis scores are averaged; projects that scored above the average are selected for on-site monitoring. Additionally, all new subrecipients and those that have not been monitored within the prior year are automatically selected, regardless of their risk analysis score. Once the risk analysis evaluation has been completed, monitoring visits are scheduled. Monitoring Compliance Reports and results letters are issued within 30 days of the on-site visit. Subrecipients are required to respond to any concerns or findings within 30 days of their receipt of the results letter. All concerns and/or findings must be considered closed by the City in order for the grantee to qualify for funding during the next application cycle.

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 Anniston's Citizen Participation Plan meets HUD's requirements referenced at 24 CFR 91.105(b) for citizen participation in all HUD grants programs. The City of Anniston has devised specific actions to encourage increased participation in its housing and community development programs and persons of low- to moderate-income.

A draft of the 2018 CAPER was available for public comment for a 15-day period from Saturday, December 5, 2019, through Friday, December 22, 2019. A public notice maintains in the Anniston Star which is the local legal organ for the City of Anniston. The draft of the 2018 CAPER was made available on the Community Development website at www.anniston.al.gov in English. The City also notified the public through a wide network of non-profit organizations to ensure affirmative steps to solicit participation in the CAPER preparation process. All public notices informed residents who may have disabilities and/or speak limited English to contact our office for special accommodations if necessary. A copy of the advertisement is included in the appendix.

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.

The City of Anniston has not made any major changes to the objectives of its CDBG program over the last year. The program continues to focus on public services, public facilities improvements, slum & blight demolition, and other affordable housing projects.

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

The City does not have any open Brownfields Economic Development Initiative (BEDI) grants.

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

N/A

CR-50 - HOME 91.520(d)

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

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

The City conducts onsite inspections of HOME-assisted rental units during the required affordability period to determine compliance with HUD property standards in accordance with CFR 92.251. HOME-assisted rental projects with one to four units are inspected every three years, projects from five to 25 units are inspected every two years, and projects with 26 or more units are inspected annually.

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

In accordance with 24 CFR Part 92.351, the City of Anniston has adopted affirmative marketing procedures and requirements for HOME-assisted housing containing five (5) or more housing units which do not apply to families with housing assistance with tenant-based rental assistance provided with HOME funds. These affirmative marketing steps consist of actions to provide information to otherwise eligible persons from all racial, ethnic and gender groups in the housing market area for housing units purchased, constructed, or 40 rehabilitated under the HOME Program. The City of Anniston will periodically assess its affirmative marketing program to determine the success of affirmative marketing actions and make any necessary corrective actions. The assessment of the Affirmative Marketing Procedures will occur at least annually as the City evaluates its housing programs, as a part of the preparation of the CAPER.

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

Section CR-15 provides details on the receipt and expenditure of program income over the program year.

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)

The City has several programs aimed at both fostering and maintaining affordable housing. These programs include but are not limited to: the use of HUD's Housing Choice Voucher program, programs geared towards the maintenance of existing housing stock, programs designed to keep low-to-moderate-income families in their homes, acquisition and rehabilitation programs, anti-poverty programming, and programs to improve social service coordination. (For a detailed listing of program activities please refer to section CR35-Other Actions).