

2019

CITY OF ANNISTON

Action Plan

PREPARED BY DUNN & MAX CONSULTING

The Process

PR-05 Lead & Responsible Agencies 24 CFR 91.200(b)

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

The following are the agencies/entities responsible for preparing the Action Plan and those responsible for administration of each grant program and funding source.

Agency Role	Name	Department/Agency
Lead Agency	ANNISTON	Community Development
CDBG Administrator	ANNISTON	Community Development
HOME Administrator	ANNISTON	Community Development

Table 1 – Responsible Agencies

Narrative

The City of Anniston is the lead agency for the development, administration, and review of the 2019 Annual Action Plan. Administrative support and oversight is provided by the City's Community Development Department. The Annual Action Plan provide a comprehensive strategy to address the City's housing and community development needs with CDBG and HOME funds. All CDBG and HOME-funded projects are reviewed and monitored by the City's Community Development Department for compliance with applicable federal rules and regulations.

Action Plan Public Contact Information

Public concerns, issues, or comments regarding the Annual Action Plan may be directed to:

Primary Contact:

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Anniston, Alabama 36202

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Secondary Contact:

Ms. Mary Motley, Community Development Coordinator
Anniston City Hall
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Anniston, Alabama 36202

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PR-10 Consultation - 91.100, 91.200(b), 91.215(l)

Introduction

The City developed an outreach effort to maximize input from a large cross-section of stakeholders. This outreach effort included public meetings, neighborhood meetings, published meeting notices, and a web survey conducted in both English and Spanish.

Consultation with the community and affected service providers is a fundamental component of the Action Plan process. The City of Anniston conducted significant consultation with citizens, municipal officials, non-profit agencies, public housing agencies, governmental agencies, and the Continuum of Care in preparing this Plan.

The last piece of the stakeholder outreach component involved surveying local broadband and hazard mitigation agencies. Additionally, relevant stakeholders were invited to complete surveys inquiring about the state of broadband access, broadband literacy, hazard mitigation, and resiliency efforts in the City.

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

The City of Anniston welcomed and encouraged the participation of all citizens in the development of this plan and in the review of progress in implementing plan activities. The City particularly encouraged involvement by low and moderate-income households residing in areas targeted for program activities for minorities and non-English speaking persons, as well as persons with disabilities. In addition, residents of public housing and other assisted housing are encouraged to participate. A special effort is made to assure that low and moderate-income persons, households in areas assisted by program activities and persons special needs have opportunities to participate.

The City held one public meeting through its public participation process for citizens to review the draft priorities. This meeting is summarized in the Citizen Participation Section of this plan. Draft of the plan have been posted on the City webpage and at City Hall. Notice of the public meeting was published in the local newspaper.

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

To enhance the coordination between public and assisted housing providers, private and governmental health/service agencies, the City incorporates the following actions into its Planning process: the Anniston City Council is informed and formally approves of all Action Plan proceedings; the City attempts to correspond with public and private agencies that provide CDBG and HOME eligible services to obtain information on current needs; submits invitations to public hearings; incorporates needs information into Action Plan; informs agencies of the availability of funding for projects that will address priority needs identified in the Consolidated Plan.

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

The City is a part of the regional Homeless Coalition of Northeast Alabama (HCNEA) Continuum of Care, which includes the City of Anniston and Gadsden and the following counties: Calhoun, Cherokee, DeKalb and Etowah. In consultation to develop this plan, the City consulted with the Continuum to gain access to all CoC data. The City was provided data from the Homeless Management Information System (HMIS), Point-in-Time Count (PIT), the Housing Inventory Count, and information from the Annual Homeless Assessment Report (AHAR). Through this collaboration, the City ensures that CoC goals and the City's Consolidated Plan priorities are integrated into the Action Plan.

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

Representatives from the broad community, community councils, social service agencies, businesses, and housing agencies took the online survey in May 2018. Stakeholder Meetings were also held and included representatives from the following organizations:

Agency/Group/ Organization	Agency/Group/ Organization Type	Section of Plan Addressed by Consultation	How Consulted
West Anniston Foundation	Nonprofit	Housing	Public Meeting
The Right Place	Nonprofit	Housing, Homeless Persons	Public Meeting
Anniston Housing Authority	Public Housing Agency	Housing	Public Meeting
Calhoun County Emergency Management Agency	Government	Hazard Mitigation	Survey
Cable One	Private	Broadband	Survey

AT&T	Private	Broadband	Survey
Federal Communications Commission	Government	Broadband	Survey

Table 2 – Agencies, groups, organizations who participated

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

The City did not exclude any agency type or agency during this process.

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

Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
Continuum of Care	Homeless Coalition of Northeast Alabama (HCNEA)	Coordinating homelessness services with Continuum of Care priorities

Table 3 – Other local / regional / federal planning efforts

Describe cooperation and coordination with other public entities, including the State and any adjacent units of general local government, in the implementation of the Action Plan (91.215(l))

In accordance with 24 CFR 91.100(4), the City notified adjacent units of local government of non-housing community development needs included in its Con Plan. The City has continued to interact with public entities at all levels to ensure coordination and cooperation in the implementation of the Action Plan and thereby maximize the benefits of the City's housing and community development activities for the residents being served. Stakeholder meetings included representatives of the Anniston Housing Authority.

Data was collected from the following organization:

- US Department of Housing and Urban Development (HUD)

Narrative (optional):

Combined, these agencies provide housing and supportive services to the community's special needs populations, including persons with disabilities, homeless families and individuals, chronic homeless persons, persons with HIV/AIDS, and the elderly. In addition to many of the agencies listed above many of the groups and agencies that were consulted provided information during the development of the plan.

AP-12 Participation

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

During the preparation of the Annual Action Plan, a Public Review Meeting was held on Thursday, July 11, 2019 to obtain comments on the recommendations for CDBG and HOME Programs. All comments received can be found below. A 30-day comment period commenced on Friday, June 28, 2019 and concluded Monday, July 29, 2019 for the public to review and provide comments on the 2019 Annual Action Plan. The plan was available for review in hard copy at City Hall.

In an attempt to increase public participation, the City actively maintains communication with local nonprofits and housing developers and will adhere to the following actions to improve citizen participation:

- Posted copies of the draft plan in City Hall. The location of the copy was noted in the final hearing legal advertisement.
- Posted the draft plan electronically on the City website.
- Provided opportunity to comment on the plan at a formal public meeting.
- Published meeting in the local newspaper legal advertisement section.
- Solicited comments from interested social service agencies.
- Advertised public hearing schedule in the local newspaper.
- A draft of the 2019 Annual Action Plan was placed on public display for 30 days beginning June 28, 2019.
- The City held a public hearing on July 11, 2019 to obtain final comments on the proposed the proposed use of funds for FY 2019.

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/ attendance	Summary of Comments received	Summary of comments not accepted and reasons	URL (If applicable)
1	Public Meeting	Non-targeted/ broad community	There was 1 public meeting held with a total of 0 attendees	Rental assistance is a priority; there is a need for more affordable housing, transportation, targeted investment in West Anniston, economic development programs, transitional housing programs, homeless services, less substantial rehab and more long-term housing options	All comments were accepted	n/a
2	Newspaper Ad	Non-targeted/ broad community	The public was notified of the public meetings via a newspaper ad	The City did not receive any comments based solely on the newspaper ad.	All comments were accepted	n/a

Expected Resources

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

Introduction

The City uses multiple resources to carry out activities that benefit low and moderate-income persons. The City of Anniston receives an annual formula-based allocation from HUD. In Program Year (PY) 2019, the City of Anniston will receive \$556,454.00 in CDBG funding and \$390,089.00 in HOME funding.

Anticipated Resources

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan	Narrative Description
			Annual Allocation:	Program Income:	Prior Year Resources:	Total:		
CDBG	Public-Federal	Community Development, Homeowner Rehab, Planning & Admin Public Services	\$556,454	\$10,000		\$566,454	\$2,265,816	CDBG funds used throughout the City will leverage other federal, local and private funds.
HOME	Public-Federal	Acquisition, Renovation, and New Construction of Affordable Housing, Rental Rehab	\$390,089	\$30,000		\$420,089	\$1,680,356	HOME funds will leverage other federal, local, and private funds. Subrecipient or developers supply 25% match of HOME funds.

Table 4 - Expected Resources – Priority Table

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

The City will use a combination of public and private funding to carry out activities identified in this plan. During PY 2019, the City will research opportunities to apply for additional funding streams which are consistent with the goals of the Consolidated Plan.

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

During the PY 2019, the City does not anticipate using publicly owned land or property to address the needs identified in the Annual Action Plan.

Annual Goals and Objectives

AP-20 Annual Goals and Objectives

Goals Summary Information

Sort Order #	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	Improve access to and quality of housing	2019	2020	Affordable housing	Citywide	Expand affordable housing opportunities	\$130,000.00	Homeowner Housing Rehabilitated: 20 units
2	Planning and administration	2019	2020	Administration	Citywide	Planning & administration	\$111,290.80 CDBG \$39,008.90 HOME	Other: 1
3	Eliminate Slums & Blight	2019	2020	Public Housing	Citywide	Eliminate Slums and Blight	\$100,000.00	Units Demolished: 10
4	Provide public services	2019	2020	Non-Homeless Special Needs Non-Housing Community Development	Citywide	Public Services	\$83,468.00	Public Services for LMI persons: 500
5	Public Facility Improvements in Low-Mod Areas	2019	2020	Public Facility	Citywide	Public Facility Improvements in Low-Mod Areas	\$131,695.20	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 2 facilities
6	Expand affordable housing opportunities	2019	2020	Affordable Housing	Citywide	Expand affordable housing opportunities	\$351,080.10	Rental units constructed: 5 LMI Households Owner Units Rehabilitated: 5; Rental Housing rehabilitated: 5
Total							\$946,543.00	

Table 5 – Goals Summary

Goal Descriptions

1	Goal Name: Improve access to and quality of housing
	Goal Description: Support rehabilitation of housing for low income households
2	Goal Name: Planning and administration
	Goal Description: Administrative and planning costs to operate the CDBG program successfully
3	Goal Name: Eliminate Slums & Blight
	Goal Description: Demolition of vacant and abandoned substandard housing units
4	Goal Name: Provide public services
	Goal Description: Provision of public services
5	Goal Name: Public Facility Improvements In Low-Mod Areas
	Goal Description: Construct new or renovate existing public facilities to serve predominantly LMI households plus special needs and/or homeless individuals
6	Goal Name: Expand affordable housing opportunities
	Goal Description: New construction/acquisition/Rehabilitation of affordable housing units

Table 6 – Goal Descriptions

Projects

AP-35 Projects – 91.220(d)

Introduction

The activities that have been selected for inclusion in this Plan are based on the priorities and public input. The City of Anniston will initiate activities to ensure that community development, affordable housing, and homelessness goals are achieved.

PY2019 Project Information

PROJECT	PY2019 FUNDING	DESCRIPTION	ANNUAL GOALS	TARGET AREAS	PRIORITY NEED ADDRESSED
City of Anniston CDBG Administration/Planning	\$111,290.80	CDBG Planning/Administration	Planning and Administration	Citywide	Planning and Administration
The Right Place	\$10,000.00	Rehabilitation/Supportive Staff Hillside Cottages	Provide Public Services	Citywide	Public Services
Boys & Girls Club	\$9,500.00	YLEAD Salary, Training,	Provide Public Services	Citywide	Public Services
All Saints for Concern	\$10,000.00	Community Utility Assistance	Provide Public Services	Citywide	Public Services
St. Michaels	\$22,500.00	Healthcare for Underserved	Provide Public Services	Citywide	Public Services
Interfaith Ministries	\$20,000.00	Emergency Assistance	Provide Public Services	Citywide	Public Services
Community Enabler	\$11,468.00	Food Pantry & Utility Assistance	Provide Public Services	Citywide	Public Services
World Changers	\$5,000.00	Rehabilitation	Support rehabilitation of housing for low income households	Citywide	Affordable Housing
The Right Place	\$100,000.00	Rehabilitation	Support rehabilitation of housing for low income households	Citywide	Affordable Housing
Habitat for Humanity	\$25,000.00	Weatherization & Repair	Support rehabilitation of housing for low income households	Citywide	Affordable Housing
Anniston Public Works	\$100,000.00	Slum & Blight	Eliminate Slums & Blight	Citywide	Neighborhood Redevelopment/ Facility Improvements in Low - Mod Areas
The Little Tree Preschool	\$15,060.00	ADA Playground Equipment	Public Facility Improvements in Low-Mod Areas	Citywide	Neighborhood Redevelopment/ Facility Improvements in Low - Mod Areas
Anniston Housing Authority	\$116,635.20	Cooper Homes - New Construction	Public Facility Improvements in Low-Mod Areas	Citywide	Affordable Housing
Anniston Housing Authority	\$64,995.10	Barber Terrace	Affordable Housing	Citywide	Affordable Housing
Anniston Housing Authority	\$100,000.00	Cooper Homes	Affordable Housing	Citywide	Affordable Housing
The Right Place	\$96,085.00	Hillside Cottage Phase II - Tiny Homes	Affordable Housing	Citywide	Affordable Housing
Northeast Alabama Community Development Corporation	\$31,486.65	Affordable Housing	Affordable Housing	Citywide	Affordable Housing
City of Anniston HOME Administration/Planning	\$39,008.90	HOME Planning/Administration	Planning and Administration	Citywide	Planning and Administration
CHDO 15% Set-Aside	\$58,513.35	CHDO 15% Set-Aside	Affordable Housing	Citywide	Affordable Housing

Table 7 - PY2019 Project Information

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

Federal CDBG and HOME funds are intended to provide low and moderate income (LMI) households with viable communities, including decent housing, a suitable living environment and expanded economic opportunities. Eligible activities include community facilities and improvements, housing rehabilitation and preservation, affordable housing development activities, public services, economic development, planning, and administration. The system for establishing the priority for the selection of these projects in the City of Anniston predicated upon the following criteria:

- Meeting the statutory requirements of the CDBG and HOME program
- Meeting the needs of LMI residents
- Focusing on LMI areas or neighborhoods
- Coordination and leveraging of resources
- Increasing affordable housing throughout the City
- Sustainability and/or long-term impact of affordable housing initiatives
- The ability to demonstrate measurable progress and success

AP-38 Project Summary

Project Summary Information

#	PROJECT	DESCRIPTION
1	City of Anniston CDBG Administration/Planning	CDBG Planning/Administration
2	The Right Place	Rehabilitation/Supportive Staff Hillside Cottages
3	Boys & Girls Club	YLEAD Salary, Training,
4	All Saints for Concern	Community Utility Assistance
5	St. Michaels	Healthcare for Underserved
6	Interfaith Ministries	Emergency Assistance
7	Community Enabler	Food Pantry & Utility Assistance
8	World Changers	Rehabilitation
9	The Right Place	Rehabilitation
10	Habitat for Humanity	Weatherization & Repair
11	Anniston Public Works	Slum & Blight
12	The Little Tree Preschool	ADA Playground Equipment
13	Anniston Housing Authority	Cooper Homes - New Construction
14	Anniston Housing Authority	Barber Terrace
15	Anniston Housing Authority	Cooper Homes
16	The Right Place	Hillside Cottage Phase II -Tiny Homes
17	Northeast Alabama Community Development Corporation	Affordable Housing
18	City of Anniston HOME Administration/Planning	HOME Planning/Administration
19	CHDO 15% Set-Aside	CHDO 15% Set-Aside

Table 8 – Project Information

AP-50 Geographic Distribution – 91.220(f)

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

Priority CDBG funding areas in the City of Anniston include areas where the percentage of low to moderate income (LMI) persons is 51% or higher. The City defines “area of minority concentration” and “area of low-income concentration” as those census tracts that have concentrations of minority populations or low-income populations, respectively, statistically and significantly larger than the minority or low-income population for the City as a whole. For the purposes of this Annual Plan, “Minority concentration” is defined as those tracts with greater than 51%. Below is a list of census tracts with low and moderate populations greater than 51%:

TRACT	BLKGRP	LOWMOD	LOWMODUNIV	LOWMODPCT
200	1	875	1320	66.29%
300	2	1325	1830	72.40%
300	1	1090	1245	87.55%
400	3	585	1045	55.98%
400	1	755	1205	62.66%
400	2	660	855	77.19%
500	1	685	1000	68.50%
500	2	665	735	90.48%
600	1,2	1355	1955	69.21%
700	2	1030	1555	66.24%
800	1	540	825	65.45%
1201	2	560	895	62.57%
1500	3	675	1180	57.20%
1600	4	620	990	62.63%

Source: HUD Exchange, FY 2017 LMISD by Grantee - Summarized Block Group Data, Based on 2006-2010 American Community Survey, <https://www.hudexchange.info/programs/acs-low-mod-summary-data/acs-low-mod-summary-data-summarized-block-groups/>

Geographic Distribution

Target Area	Percentage of Funds
Citywide	80%

Table 9 - Geographic Distribution

Rationale for the priorities for allocating investments geographically

The City will use HOME and CDBG funds throughout the jurisdiction to serve low and moderate-income persons. A portion of HOME and CDBG funds will be used for the owner and rental housing rehabilitation and to allocate funding to local service providers in the City. This method of allocation will enable the City to serve the most disadvantaged residents given the limited funding available.

AP-55 Affordable Housing – 91.220(g)

Introduction

The City conducted its Assessment of Fair Housing (AFH) in 2017 and as part of that process the City and its stakeholders who participated in the process identified contributing factors that create barriers to affordable housing and opportunities. A detailed description of these contributing factors can be found in the 2017 AFH (accessed from the City of Anniston). The plan identified lack of income, limited transportation options, lack of local private fair housing outreach and enforcement, age and condition of housing, and availability of affordable units in a range of sizes.

Over the next Action Plan period, the following strategies will be implemented to remove or ameliorate affordable housing barriers. They include:

1. Development of affordable single and multi-family housing under the HOME program
2. Rehabilitation of single and multi-family housing under the CDBG program
3. Execution of a contract to provide fair housing education and outreach services
4. Demolition of condemned to eliminate slums and blight

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

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

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

Table 11 - One Year Goals for Affordable Housing by Support Type

Discussion: N/A

AP-60 Public Housing – 91.220(h)

Introduction

The Housing Authority of the City of Anniston, also known as the Anniston Housing Authority (AHA), was established in 1938. The AHA's mission is to serve the needs of low-income persons in the Anniston Housing Authority jurisdiction by taking steps to promote adequate and affordable housing, promote economic opportunity, and to promote a suitable living environment without discrimination. The Housing Authority of the City of Anniston administers public housing located at Barber Terrace, Constantine Homes, Fairview Terrace, Glen Addie Homes, Hobson City, Norwood Homes, Parkwin Homes, Tinsley Manor, and Washington Homes. The city also administers the Section 8 Housing Choice Voucher Program.

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

The City of Anniston and the HOME Consortium plans to work with the Public Housing Authorities in the Consortium by providing information on homes that become available through rehabilitation activities and home construction. The City of Anniston will continue communication with the Anniston Housing Authority (AHA) regarding ways of aiding as they move forward with their strategic plan implementation.

Sine the Choice Neighborhoods Program was funded during PY 2017, the ACCHC will again consider the option of providing HOME Program funds to eligible activities associated with a Choice Neighborhoods application developed jointly by the City of Anniston/Anniston Housing Authority/Anniston Public Schools. The City of Anniston and the Anniston Calhoun County HOME Consortium will also implement recommendations outlined in the 2017 Assessment of Fair Housing.

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

The Anniston Public Housing Authority distributes information to PHA residents regarding fair housing, homeownership and rental opportunities for affordable housing rehabilitated with CDBG or HOME funds and constructed with HOME funds.

The AHA operates a resident council program which will provide for unified input into policies and practices of the organization and future planning. The objective of the Council is to review the effectiveness of housing authority policies and practices, make recommendations for expanded tenant services and activities, and have input into the redevelopment plans of the housing authority. Resident leaders make up the Anniston Housing Authority's Executive County and Advisory Board who represent various communities within the AHA.

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

No public housing authority located in Calhoun County is designated as a "troubled" Public Housing

Authority.

Discussion: N/A

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

Introduction

The City actively participates in the regional CoC serving northeast Alabama, provides funding support to address service needs, and coordinates care with local service providers addressing homeless needs. The City of Anniston is a participating jurisdiction in the Homeless Coalition of Northeast Alabama (HCNEA). The Community Development Coordinator for the city attends Coalition meetings to ensure that collaborative efforts occur between the city and the coalition. The City of Anniston's Annual Action Plan provides funding support for agencies providing services to the homeless. The identified projects target homeless individuals and families who lack the resources to independently regain stable housing. Programs are designed to connect clients with the services necessary to ensure their move from emergency shelter to transitional or permanent housing.

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

The City of Anniston does not receive Emergency Solutions Grant (ESG) funds directly to provide Emergency Shelter, Rapid Rehousing and Homelessness Prevention activities for homeless families. The City funds projects through its CDBG program that benefit Anniston residents. The funded projects are designed to help shorten the length of time the client experiences homelessness, improve their ability to secure stable housing, and prevent recurrent homeless episodes. Wrap-around/supportive services have been identified as a more efficient strategy in reducing reoccurring periods of homelessness

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

The City supports the initiatives Homeless Coalition to address the housing and supportive services of homeless people. The Community Development Department of the City of Anniston makes regular referrals of homeless individuals to the Homeless Coalition which refers these individuals to agencies serving the homeless and provide housing. There are times when no vacancies are available for longer-term needs. The Homeless Coalition helps assess the individual needs of each family place them in the best housing situation for their circumstances. Over the next Consolidated Plan period, the City plans to continue collaborating with various local nonprofits organizations to expand services for the homeless and at-risk of homelessness population.

Addressing the emergency shelter and transitional housing needs of homeless persons

The City of Anniston will continue to support local non-profits such as The Right Place, Community Enabler, St. Michael's Clinic, and All Saints Interfaith Center addressing transitional housing. Although, the City of Anniston does not receive its own ESG allocation; the city maintains steady support by leveraging its CDBG allocation to provide foundational support to these organizations. These organization are eligible to receive ESG support through the State of Alabama who receives a direct allocation to provide essential services and operations to emergency shelters and transitional housing facilities. These facilities provide shelter and services to citizens of Calhoun County including Anniston to include homeless families, single

men and women, and survivors of domestic violence. The City and County supports increasing housing options and self-sufficiency for the homeless and near homeless by supporting transitional housing where appropriate.

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 regularly collaborates with the Homeless Coalition of Northeast Alabama to help individuals, children, and families facing housing crises. The City works closely with CoC member organizations to provide foundational support for these organizations to be able to continue to provide needed services to the residents of the Anniston community. The coordination between the City and the regional CoC is imperative to assess the needs of homeless and low-income families in avoiding homelessness, addresses the emergency shelter and transitional housing needs, and helps both homeless and chronically homeless make the transition to permanent housing and independent living. The need for transitional and permanent housing is a critical need in the City of Anniston.

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

Public systems or institutions (i.e. jails, prisons, hospitals, child welfare, mental health facilities, etc.) often release individuals directly into homelessness. 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. The Homeless Coalition of Northeast Alabama Board of Directors will continue to work closely with jails and hospitals to make sure that hospital social workers have appropriate discharge protocols and are not routinely discharging patients to the streets or emergency shelter.

Discussion: N/A

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

Introduction:

The City conducted its Assessment of Fair Housing (AFH) in 2017 and as part of that process the City and its stakeholders who participated in the process identified several contributing factors that create barriers to affordable housing and opportunities. A detailed description of these contributing factors can be found in the 2017 AFH (accessed from the City of Anniston) and highlights are listed below:

Actions it planned to remove or ameliorate the negative effects of public policies that serve as barriers to affordable housing such as land use controls, tax policies affecting land, zoning ordinances, building codes, fees and charges, growth limitations, and policies affecting the return on residential investment

Goal 1:

Improve knowledge and awareness of the Fair Housing Act, related housing and discrimination laws, regulations, and the requirements to affirmatively further fair housing in the community.

Strategies: In order to address this goal, the following activities and strategies should be undertaken:

- **1-A:** Outline the procedures and process to report or file a fair housing complaint.
- **1-B:** Publicize the procedures and process in the local newspaper; post in public buildings, social service agencies' offices, and print out fliers to pass out.
- **1-C:** Develop opportunities to educate tenants, landlords, sellers, and mortgage brokers.
- **1-D:** Establish an arbitration process for fair housing complaints which are filed on the basis of refusal to make reasonable accommodations.
- **1-E:** Review and improve the rate of underwriting approval for minorities and persons of Hispanic origins in mortgage loan approvals as evidenced by the Home Mortgage Disclosure Act (HMDA) data.
- **1-F:** All essential documents, forms, and directions should be printed in English and Spanish, and a reference sheet in multiple languages should be attached to inform non-English speaking persons who to contact.

Goal 2: Promote the development and rehabilitation of various types of housing that is affordable to lower income households.

Strategies: In order to address this goal, the following activities and strategies should be undertaken:

- **2-A:** Continue to support and encourage plans from both private developers and non-profit housing agencies to develop, construct, and/or rehabilitate affordable housing in the City.
- **2-B:** Encourage the development, construction, and/or rehabilitation of mixed income housing in the City.
- **2-C:** Survey the existing residential, mixed-use residential/commercial, and vacant structures to better utilize space for additional housing.

- **2-D:** Provide financial assistance to seniors and lower-income households in the City for home improvements so they can remain in their residences.
- **2-E:** Develop a housing rehabilitation program with low-interest loans/grants in lower-income neighborhoods where there is the highest percentage of vacant and deteriorated housing.
- **2-F:** Encourage the development and/or rehabilitation of workforce housing for income-eligible City employees and other City residents.

Goal 4: To bring local policies and regulations into compliance with state and Federal laws, including the Federal Fair Housing Act, Section 504 of the Rehabilitation Act, the Americans with Disabilities Act, etc., to affirmatively further fair housing and housing choice in the City of Anniston.

Strategies: In order to meet this goal, the following activities and strategies should be undertaken:

- **4-A:** Review and annually update the City's Unified Development Code (zoning ordinance) to include additional definitions and clarification on group homes.
- **4-B:** Continue to enforce local building codes through biennial inspections of all rental units to bring them into compliance under the City's Apartment Code Enforcement (ACE) Program.
- **4-C:** Evaluate opportunities to assist both private and non-profit housing developers to construct and/or rehabilitate mixed-income housing.
- **4-D:** Implement the housing needs and opportunities recommendations from the City's Comprehensive Plan
- **4-E:** Continue to review and update the City's Comprehensive Plan on a biennial basis to ensure that it identifies the current needs and opportunities in the City of Anniston

Discussion: N/A

AP-85 Other Actions – 91.220(k)

Introduction:

Actions planned to address obstacles to meeting underserved needs

Actions planned to foster and maintain affordable housing

The City will use HOME funds and a portion of CDBG funds for new affordable housing initiatives and to rehabilitate existing housing units. The special needs population will be served through grants to local service providers. The homeless population will be served through assistance grants to local service providers.

Actions planned to reduce lead-based paint hazards

According to the 2016 American Community Survey, 75% of Anniston's housing units were built before 1978. To address lead-based paint hazards the City adheres to the Residential Lead-Based Paint Hazard Reduction Act of 1992 in federally assisted housing. The City requires disclosure of known information on lead-based paint hazards before the sale or lease of housing built before 1978. The City also implemented city codes and regulations to protect its citizens from lead-based paint hazards which is integrated through purchasing policies and code enforcement.

The City has hired a contractor to provide lead testing, risk assessments, and remediation/abatement services. Their services will be used as needed, determined by the age, condition, and presence of lead-based paint as determined by a certified Lead Assessment professional. Lead safe work practices will be adhered to as applicable for housing rehabilitation, public facility improvements, and demolition/clearance of vacant and abandoned dilapidated housing units.

Actions planned to reduce the number of poverty-level families

Poverty-reducing goals, programs and policies are coordinated with the housing plan by using the City's Department of Community Development to administer both CDBG and HOME. This structure ensures continuity and that poverty-reducing activities implemented under CDBG are provided in conjunction with housing related efforts and decisions. Ongoing communication between the City and non-housing and housing service providers will support such efforts.

Actions planned to develop institutional structure

The City of Anniston will use the Community Development Department as the lead agency for program planning, management, coordination and administration of the Community Development Block Grant Program and HOME Investment Partnerships Program. The Community Development Department works as the housing and community development liaison between County agencies, local public housing, participating cities, state agencies, and non-profit and community-based organizations.

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

The Community Development Department encourages collaborative relationships with subrecipients to develop wrap-around services for clients being served. Relationship building among these social services and housing agencies encourages referrals, creating the appropriate case management to move clients from homelessness, through to emergency shelter and transition housing services, to affordable rental housing and homeownership opportunities. Ultimately, this collaborative approach assists in developing longer-term, sustainable solutions to the challenge's clients face in maintaining their self-sufficiency.

Discussion: N/A

Program Specific Requirements

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

Introduction:

Community Development Block Grant Program (CDBG)

Reference 24 CFR 91.220(l)(1)

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

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

Other CDBG Requirements

1. The amount of urgent need activities	0
2. The estimated percentage of CDBG funds that will be used for activities that benefit persons of low and moderate income. Overall Benefit - A consecutive period of one (2018), two or three years may be used to determine that a minimum overall benefit of 70% of CDBG funds is used to benefit persons of low and moderate income. Specify the years covered that include this Annual Action Plan.	70

HOME Investment Partnership Program (HOME)

Reference 24 CFR 91.220(l)(2)

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

In PY2019 the City of Anniston will utilize investment of HOME program funds as designated in CFR part 92.205(b). The consortia will provide HOME Program funds to eligible affordable housing agencies to assist low-income residents. The 2019 HOME allocation in the amount of \$390,089.00 (entitlement grant) plus \$30,000 (estimated program income is proposed to be used as follows:

2. A description of the guidelines that will be used for resale or recapture of HOME funds when used

for homebuyer activities as required in 92.254, is as follows:

The HOME rule at §92.254(a)(5) establishes the resale and recapture requirements HOME grantees must use for all homebuyer activities. These provisions are imposed for the duration of the period of affordability on all HOME-assisted homebuyer projects through a written agreement with the homebuyer, and enforced via lien, deed restrictions, or covenants running with the land. The resale or recapture provisions are triggered by any transfer of title, either voluntary or involuntary, during the established HOME period of affordability.

When undertaking HOME-assisted homebuyer activities, including projects funded with HOME program income, the City must establish resale or recapture provisions that comply with HOME statutory and regulatory requirements and set forth the provisions in its Consolidated Plan. HUD must determine that the provisions are appropriate. The written resale/recapture provisions that the City submits in its Annual Action Plan must clearly describe the terms of the resale/recapture provisions, the specific circumstances under which these provisions will be used, and how the City will enforce the provisions.

Note: The City of Anniston's complete Resale and Recapture provisions are included as an appendix. Below is a summary of applicable portions of the provisions.

3. A description of the guidelines for resale or recapture that ensures the affordability of units acquired with HOME funds? See 24 CFR 92.254(a)(4) are as follows:

The City's resale and recapture provisions ensure the affordability of units acquired with home funds in the following several ways.

The HOME rule at §92.254(a)(4) establishes the period of affordability for all homebuyer housing. The City's calculation for the period of affordability is based upon the amount of HOME assistance in each unit and the applicable period of affordability under resale or recapture provisions.

a. Period of Affordability Under Resale Provisions

Under resale, §92.254(a) (5) (i) the HOME rule states that the period of affordability is based on the total amount of HOME funds invested in the housing. In other words, the total HOME funds expended for the unit determines the applicable affordability period. Any HOME program income used to assist the project is included when determining the period of affordability under a resale provision.

b. Period of Affordability Under Recapture Provisions

For HOME-assisted homebuyer units under the recapture option, the period of affordability is based upon the HOME-funded direct subsidy provided to the homebuyer that enabled the homebuyer to purchase the unit. Any HOME program income used to provide direct assistance to the homebuyer is included when determining the period of affordability.

The following table outlines the required minimum affordability period:

If the total HOME investment (resale) or Direct Subsidy (recapture) in the unit is:	The Period of Affordability is:
Under \$15,000	5 years

Between \$15,000 and \$40,000	10 years
Over \$40,000	15 years

Table 12 - Minimum Affordability Periods

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

The City does not anticipate refinancing any existing debt with its HOME funds during the 2019 Annual Action Plan year.



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