



City of Albany, Oregon
Consolidated Annual Performance Evaluation and Report
For the Community Development Block Grant (CDBG) 2015 Program Year
Due to HUD: September 30, 2016

CR-05 - Goals and Outcomes

Progress the jurisdiction has made in carrying out its strategic plan and its action plan. 91.520(a)
This could be an overview that includes major initiatives and highlights that were proposed and executed throughout the program year.

The City of Albany receives an annual Community Development Block Grant (CDBG) entitlement from the U.S. Department of Housing and Urban Development (HUD). As a recipient of CDBG funds, the City is required to prepare a five-year strategic plan that identifies community needs, prioritizes these needs, and establishes goals and objectives to meet the needs. This five-year plan is called the Consolidated Plan.

Each year the City is also required to provide the public and HUD with an assessment of its accomplishments towards meeting the goals and objectives identified in the 2013-2017 Consolidated Plan. This report is called the Consolidated Annual Performance Evaluation and Report (CAPER). The CAPER also evaluates Albany's progress toward meeting the one-year goals identified in the Annual Action Plan.

The Fiscal Year 2015 Annual Plan was the City's third program year of the 2013-2017 Consolidated Plan. The City received \$378,904.00 in CDBG funding for the 2015 program year (July 1, 2015 through June 30, 2016). In addition, the City carried over \$264,592.59 in 2013 and 2014 program year funds into FY 2015.

In FY 2015, the City spent a total of \$220,680.50 in CDBG funds and served 183 Albany residents. Services included infant abuse prevention services, court appointed special advocates for children removed from their homes, shelter and case management for at-risk youth and for women and children, emergency housing assistance, housing rehabilitation, and small business development. The City finalized engineering for Sunrise Park storm drainage in preparation for a park remodel, pending state and federal approvals for work in wetlands on the site. The City also hosted a presentation and conversation on the history of discrimination in Oregon, monitored housing ads for discriminatory language, and responded to complaints.

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)

Table 1 compares proposed and actual outcomes of the City's progress towards completing the 5-year goals identified in the Consolidated Plan and priorities identified in the FY 2015-16 Action Plan.

Table 1 – Accomplishments - Program Year and Five Year Strategic Plan to Date

Goal	Anticipated Five Year CDBG Allocation	15-16 CDBG Allocation	Indicator/Activity	Unit of Measure	Expected Five Year Outcome	Actual Five Year Outcome	Five Year Percent Complete	Expected 15-16 Outcome	Actual 15-16 Outcome	15-16 Percent Complete
1. Remove Barriers to Accessibility	\$222,000	\$55,000	Public Facility or Infrastructure Activities	Curb Ramps	50	0	0%	0	0	0%
				Persons Assisted	0	0	0%	300	0	0%
2. Improve Affordable Housing	\$400,000	\$67,300	Housing Rehabilitation	Owned Units	20	5	25%	3	1	33%
				Rental Units	20	0	0%	0	0	0%
3. Increase Economic Opportunities	\$280,000	\$0	Facade treatment/business building rehab	Businesses Assisted	2	0	0%	0	0	0%
		\$20,000	Microenterprise Assistance	Residents Assisted	150	83	55%	10	25	250%
		\$24,000	Small Business Development: Job Creation	Jobs Created	40	25	63%	3	9	300%
4. Further Fair Housing	\$10,000	\$1,000	Education and Outreach	Households Assisted	100	48	48%	20	20	100%
5. Reduce Homelessness	\$160,000	\$0	Homeless Prevention	Trans'l Beds Added	20	16	80%	0	0	0%
6. Provide Public Services	\$302,000	\$22,900	Homeless Prevention Emergency Shelter Provided	Persons Assisted	50	56	112%	40	39	98%
		\$12,900	Homeless Prevention Emergency Housing Funding	Households Assisted	0	16	n/a	5	16	320%
		\$21,000	Non-Homeless Special Needs Public Services	Persons Assisted	500	340	68%	30	71	237%
7. Eliminate Blighting Influences	\$152,000	\$80,000	Public Facility or Infrastructure Activities	Persons Assisted	4000	1000	25%	100	0	0%

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 Albany allocated funding to address Consolidated Plan priorities and objectives in the FY 2015-16 Action Plan as listed below.

1. Remove Barriers to Accessibility:

- a) Curb Ramps and Sidewalks: The City met with residents in Census Tract 208 to identify infill sidewalk and intersection safety improvements needed to improve the safety and accessibility of routes to schools and services in the Sunrise neighborhood. A four-block infill sidewalk project on 19th Avenue went out to bid. The low bidder was awarded the contract and will complete the work in March 2017. The project will provide sidewalk connection to Sunrise Elementary School.
- b) Accessibility Improvements at or near Public Facilities: See updates under #7, Remove Blighted Conditions.

2. Maintain and Improve the Quality of Affordable Housing: In FY 2015, one low-income, owner-occupied house was rehabilitated and four single-family rehabs are underway. Numerous applications were processed that did not move forward. Grants are available to households earning 60% of the area median income located within Albany's two Target Areas, Census Tracts 204 and 208. Households must also qualify for free weatherization assistance.

3. Increase Economic Opportunities:

- a) Microenterprise and Small Business Assistance: In FY 2015, CDBG funds provided scholarships to 23 low-income Albany residents to take microenterprise and business management courses at Linn-Benton Community College (LBCC) and provided free one-on-one advising. Twelve Latino/Hispanic residents enrolled in the new introduction to business course offered in Spanish.
- b) Job Creation: Five low-mod Albany residents launched a microenterprise business as a result of LBCC courses and advising, creating five jobs for formerly unemployed residents. The City small grant program for microenterprises added four LMI jobs in FY 2015.

4. Further Fair Housing: In 2015, the City partnered with Community Services Consortium (CSC) to host a presentation and discussion on the history of housing discrimination nationally and in Oregon. Approximately 20 people attended the event. CSC received 25 housing discrimination complaints; three were referred to the Fair Housing Council of Oregon for follow up. CSC and City staff monitored housing ads for discriminatory statements and resolved one housing complaint.

5. Reduce Homelessness: FY 2015 funds supported three agencies that served 82 residents with emergency housing funds and emergency shelter and case management.

6. Public Services: FY 2015 funds provided services to Albany's special needs children to prevent child abuse and to advocate for children who are wards of the court get into permanent housing and provide shelter and case management to homeless residents.

7. Eliminate Blighting Influences in Low- and Moderate-Income Neighborhoods: The FY 2015 Action Plan and the 13-17 Consolidated Plan identified improving Sunrise Park in local target area Census Tract 208 as a priority to remove blighting influences. The park remodel project includes replacing dated and unsafe play equipment with new equipment, removing old shelters, adding a parking lot, and relocating the amenities to a more visible and accessible location within the park. The design will reduce vandalism and illegal activities that create blighting influences in the neighborhood. The parking lot required a revised environmental review record. The presence of hydric soils triggered the need for wetland delineation. The City is awaiting federal and state approvals for work in the wetlands, expected in September 2016.

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)

Table 1 – Table of assistance to racial and ethnic populations by source of funds

Race	Residents Assisted
White	146
Black or African American	9
Asian	1
American Indian or American Native	27
Native Hawaiian or Other Pacific Islander	1
Total Residents	183
Ethnicity	
Hispanic	31
Not Hispanic	152

Narrative

During FY 2015, CDBG programs served 183 residents with CDBG programming through public services, housing rehabilitation, and economic development opportunities. Of these, 80% of the 177 residents assisted were white. The ethnicity of Albany’s residents served included 17% of Latino/Hispanic origin.

Most of the residents and families supported with CDBG-funded programs were extremely low-income, earning 30% or below the median family income. Many of those served were children, including unaccompanied youth, children removed from their homes due to abuse or neglect, or children in families identified as at risk of child abuse.

The City translated brochures on CDBG funded housing and economic opportunity programs into Spanish and saw an increase in minority participation in these programs in FY 2015.

CR-15 - Resources and Investments 91.520(a)

Identify the resources made available

Table 2 – Resources Made Available

Source of Funds	Resources Made Available	Amount Expended During Program Year
CDBG	\$643,497	\$220,680

Narrative

CDBG expenditures through June 30, 2016, include funding for housing rehabilitation, microenterprise training, small business assistance, public services to Albany’s low-income residents, preventing homelessness, professional services for Sunrise Park remodel designs, and planning and administrative costs.

Identify the geographic distribution and location of investments

Table 3 – Identify the geographic distribution and location of investments

Target Area	Planned Percentage of Allocation in 15-16	Actual Percentage of Allocation
Census Tracts 204 & 208	59%	13%

Narrative

The City allocated \$225,200 in 2015 CDBG funds to activities in Albany’s two low- and moderate-income target areas, Census Tracts 204 and 208. The City completed \$49,369 in activities – including rehabilitating one house, providing emergency shelter nights, engineering and design of Sunrise Park, and wetland consultant fees.

The Sunrise Park remodel activity will remove blighting influences in the neighborhood, Census Tract 208, will make the park accessible to all residents, and is desired by residents so they don’t have to travel to a park farther away. While the park remodel is Albany’s priority community development project, it has been delayed due to the presence of wetlands on the site. The City is nearing final federal and state environmental approvals.

CDBG funds have also been allocated to sidewalk and curb ramp improvements in the Sunrise area to improve the safety and accessibility of primary routes to the local elementary and middle schools. The 19th Avenue Infill Sidewalk project construction contract was recently awarded and construction is planned for March 2017.

Leveraging

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

Albany's CDBG-funded activities leveraged private, state, and federal funds in the 2015 Program Year:

- Housing Rehabilitation – CDBG funds leveraged \$8,500 in Federal weatherization funding and staff expenses on one house completed to date and \$20,000 on houses underway.
- Small Business Management Program – CDBG funds leveraged approximately \$10,000 in private funding from business owners.
- Public service agencies leveraged \$136,964 in private funds for activities funded with 2015 CDBG program year funds.

No publicly owned land within the City of Albany was used to address housing, homeless, or other special needs identified in the Consolidated Plan.

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.

Table 4 – Number of Households

	One-Year Goal	Actual
Number of Homeless households to be provided affordable housing units	5	2
Number of Non-Homeless households to be provided affordable housing units	10	14
Number of Special-Needs households to be provided affordable housing units	0	0
Total	15	16

Table 5 – Number of Households Supported

	One-Year Goal	Actual
Number of households supported through Rental Assistance	5	16
Number of households supported through The Production of New Units	0	0
Number of households supported through Rehab of Existing Units	3	1
Number of households supported through Acquisition of Existing Units	0	0
Total	8	17

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

Homeless Households Provided Affordable Housing:

- a) Fish of Albany, Inc. received a public services grant to provide emergency shelter to five homeless households consisting of extremely low-income women with children in program year 2015. The FISH board of directors decided to close the shelter in November 2015. Between August and October, FISH served two households: one homeless family and one homeless woman, and helped them get permanent affordable housing. FISH provided 187 shelter nights; 448 hours of in-shelter instruction, activities, communication, and supervision/observation; and 196.5 hours of accessing community programs including employment.
- b) Emergency Housing Assistance: This program year, Community Services Consortium received public services funding to provide emergency housing assistance to households earning between 50 and 80 percent of the median family income. Funds were prioritized to residents with special needs, and then families with children. The program helped two homeless families obtain permanent affordable housing in Albany and 14 non-homeless households keep their housing.

Non-Homeless Households Supported Through Housing Rehabilitation: The City contracted with the Community Services Consortium (CSC), the local community action agency, to manage Albany's affordable

housing rehabilitation programs and services. This past program year, the City switched from providing loans up to \$20,000 to grants up to \$10,000. This was due to dwindling demand for loans despite identified housing rehabilitation needs. Applicants for housing rehabilitation grants must also need weatherization assistance. The income eligibility threshold was reduced from 80% of area median income to households earning 60% or less of the area median income to align with income eligibility requirements for free weatherization assistance. There has been growing interest in the program, but CSC staff turnover caused delays getting the revised program going. In FY 2015, one single-family owner-occupied house was completed and four houses are in various stages of rehabilitation.

Special Needs Housing: Albany's Consolidated Plan identifies the need to improve existing affordable housing and increase the supply of housing for Albany's special needs residents, including seniors and residents with disabilities. To date, the City has focused on expanding the supply of emergency shelter beds and transitional housing for homeless and chronically homeless residents. Senior and disabled housing needs are currently being addressed without the need for CDBG resources.

- Cascades West Council of Governments, a regional governmental agency, provides services to seniors, including helping senior and disabled residents stay in their homes.
- Linn Benton Housing Authority is the primary provider of affordable senior housing and housing for Albany's disabled residents.

CDBG housing rehabilitation grants are available to improve housing for Albany's special needs populations including the elderly and disabled.

Discuss how these outcomes will impact future annual action plans.

Albany's 2013-2017 Consolidated Plan identified the following goals for affordable housing:

- Maintain and improve the quality of existing affordable housing;
- Reduce housing cost burden by reducing operating costs and improving energy efficiency of low-income housing; and
- Increase the supply of affordable and special needs housing.

The City's CDBG Action Plan programming has been targeted to the following activities:

- Housing rehabilitation loans and grants to Albany's low-income households and owners of low-income housing;
- Increasing the supply of emergency and transitional housing; and
- Public services to provide emergency housing assistance and prevent homelessness.

In FY 16-17, the City will evaluate progress on housing rehabilitation activities and consider program and Consolidated Plan amendments to align with community demand. The City will also evaluate housing needs for Albany's special needs populations, including demand for more transitional housing.

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.

Table 6 – Number of Persons Served

Number of Persons Served	CDBG Actual
Extremely Low-income (0-30% MFI)	129
Low-income (31-50% MFI)	40
Moderate-income (51-80% MFI)	14
Total	183

MFI = Median Family Income

Narrative Information

In program year 2015, Albany’s CDBG supported programs served 183 residents through public services, small business development programs, and housing rehabilitation. Client surveys are required for Albany residents receiving CDBG funding directly. More than two thirds of the residents assisted with CDBG funds in PY 2015 were extremely low-income, earning 30 percent or less of the median family income (MFI). Of these, 20 were children under the protection of the Juvenile Court in Linn County and were presumed to be extremely low-income.

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

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

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

Objectives identified in the City's 2013-17 Consolidated Plan include reducing homelessness through homeless prevention activities and adding emergency and transitional housing capacity.

A local non-profit public service agency, Jackson Street Youth Shelter, received FY 2015 funding to provide support and services to youth at Albany's new youth shelter. The agency also operates the Cornerstone Outreach Center, a drop-in center near one of the local high schools and middle schools where they do more outreach to Albany's homeless and at-risk youth. The agency assesses the needs of these young residents and works to help them get into safe shelter and eventually reconnect them with their families or provide them with the skills to live independently.

The City granted public services funds to Community Services Consortium (CSC) in order to provide emergency housing funds. CSC was able to place two homeless families into permanent housing with these funds. CSC reaches out to homeless veterans, and put on the first fair for homeless veterans in the fall.

City of Albany staff serve on the HEART board (Homeless Enrichment and Rehabilitation Team) along with representatives from numerous agencies that serve the homeless, as well as CSC and Samaritan Health Services. HEART puts on an annual homeless resource fair the third Thursday in May. Intake forms are collected to assess homeless needs. In May 2015, 138 intake forms were collected, representing 265 adults and 157 children.

Addressing the emergency shelter and transitional housing needs of homeless persons

FISH of Albany received FY 2015 CDBG funds to provide shelter services to Albany's homeless women with children; however the agency closed the shelter at the end of October, 2015, sheltering 3 Albany residents before closing.

Jackson Street Youth Services Albany House provided shelter to 36 youth in FY 2015. Each youth was provided with a shelter bed and basic needs such as access to laundry, showers, food, clothing, and hygiene products. The program promotes self-sufficiency and youth development, and works to reconnect youth with families or help them live on their own. The shelter also places youth in transitional housing if needed. Youth work one-on-one with staff to learn daily life skills for healthy and successful living, participate in weekly case management, and set goals to improve their situations. Shelter staff help youth access education and employment; provide quality mentoring and mental health services as needed; and provide resources/referrals.

Previous CDBG program year funds were awarded to Albany Helping Hands to help them acquire two 2015 Program Year CAPER

transitional housing units, adding seven beds. The housing units provide homeless residents with stable housing and the shelter requires them to participate in a “life-skills” program. One house has five adults and the other has two adults. Jackson Street Youth Services received funds to help purchase the property containing Albany’s new youth shelter.

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.

FY 2015 funds supported public service agencies that worked to prevent homelessness in Albany.

- CASA (Court Appointed Special Advocates) of Linn County served 20 children between the ages of 0 to 17 who become wards of the court when they were removed from their homes due to abuse or neglect. CDBG funds helped CASA of Linn County add and train new CASAs in order to reduce the number of children on the waiting list. Of the 20 children served, 3 were placed in permanent housing, 1 was adopted, and 2 returned home. The other cases are ongoing.
- The Family Tree Relief Nursery provided in-home infant child abuse prevention services to high-risk families and children, serving 39 residents in FY 2015. The Therapeutic Childhood Program’s home-based services help prevent children from entering the foster care system by educating parents impacted by domestic violence and substance abuse in how to make safe choices and build healthy families. All of the children served this year stayed living safely with their families. In addition, the program helped parents gain valuable skills to reduce their risk of becoming homeless.
- Jackson Street Youth Services provided case management to Albany’s homeless and unaccompanied youth. These services will prevent the number of youth going into correctional institutions and is available to help those leaving these institutions. Jackson Street staff helped Albany’s at-risk youth gain skills to live independently and to address issues occurring within their families that caused them to become homeless.
- Community Services Consortium used CDBG funds to provide emergency housing assistance to 14 households earning between 50 and 80 percent of the area median income, and helped two homeless households get into permanent housing.

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 2015-16 Action Plan identified the following activities to help homeless residents transition to permanent housing and to prevent homelessness of Albany residents:

- Homeless Women with Children – FISH of Albany’s Guest House received CDBG funding to provide case management and support services to homeless women with children. In FY 2015, the Guest House rescued two adult women and one child from homelessness, representing two families. Both transitioned into permanent housing after receiving months of shelter and support.
- Unaccompanied Youth – Jackson Street Youth Services provided overnight shelter and counseling/case management to 36 of Albany’s homeless and at-risk youth. The agency’s Positive Youth Development approach promotes self-sufficiency through building life and leadership skills. The Transitional Living program is available for youth aged 15 to 18 that do not have a suitable home to return to.

Programs not supported with CDBG funds but that provide critical services to Albany’s homeless residents are noted below:

- Oxford & Recovery Houses – Albany has ten Oxford Houses and several “recovery” houses. Oxford houses provide a democratically run, self-supporting, drug free home for people in recovery from drug and alcohol addiction. The Oxford house model has had national success as a low-cost method of preventing relapse and helping persons in recovery get back on their feet and become a contributing member of the community. The other houses operate similar to Oxford houses and provide a shared living situation with faith-based support.
- Substance Abuse – Recovery center Community Helping Addicts Negotiate Change Effectively (C.H.A.N.C.E.) provides recovery support services in a safe environment. C.H.A.N.C.E. is staffed by people in recovery who have personal experience and leadership skills who work effectively with clients and help residents and their families through recovery. C.H.A.N.C.E. works directly with many residents coming out of jail and recovery. The agency helps residents obtain housing, skills, resources, support, recreational activities, and guidance needed for long-term recovery so they become healthy productive members of their families and community.
- Homeless Individuals – Albany has two homeless shelters, Albany Helping Hands (AHH) and Signs of Victory (SOV) Mission. Both shelters work with homeless and chronically homeless residents by encouraging them to enroll in their life-skills programs. SOV has an on-site wellness service and a clothes closet. AHH has several job skills training programs and requested FY 2016 CDBG funds for an employment coordinator. Both shelters provide supportive transitional housing to help transition some of Albany’s chronically homeless residents into supportive housing.

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

Actions taken to address the needs of public housing

The Linn Benton Housing Authority (LBHA), the local housing authority, provides public housing and addresses needs of residents in public housing. City of Albany CDBG funds are not currently allocated to addressing needs of public housing.

The City consulted with LBHA regarding needs that could be addressed with CDBG funds. There is demand for more housing for Albany's residents with mental disabilities. LBHA is beginning to explore how to address these needs. The City will stay involved in these discussions.

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

None by the City of Albany.

Actions taken to provide assistance to troubled PHAs

None.

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 Albany's land use policies support affordable housing, including density bonuses for affordable housing and provisions for accessory apartments. Additional affordable housing strategies were identified for further evaluation and included in the Consolidated Plan. The City did not allocate resources to this effort in FY 2015; however, the City hired a consultant to recommend code amendments to remove any real or perceived barriers to housing and development in the downtown area. The consultant is reviewing parking and other standards that can add cost to development. Amendments are planned for adoption in late spring of 2017.

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

Albany is fortunate to have a network of agencies that work together to meet the needs of its underserved populations, including the elderly and disabled, residents dealing with addiction, and persons with mental, physical, or developmental disabilities. Lack of CDBG funding is the primary obstacle to meeting underserved needs. The City has allocated the maximum of 15% of its entitlement grant to public services each year to date.

In FY 2015, public service agencies provided support to five agencies that provided a variety of support services to Albany's underserved residents. The focus of funding this past year was to preventing homelessness and child abuse. Funds provided emergency housing assistance, emergency shelter to unaccompanied youth and women with children, and helped child-victims get into safe, permanent housing.

Albany has experienced substantial increases in rental prices, creating demand for more affordable housing units. The City does not receive HOME funds, but is willing to provide CDBG assistance to eligible activities such as acquisition, if a project percolates. The City held agency consultations this summer to help assess community and agency needs for planning the next Consolidated Plan's projects. The City will continue to work with public and governmental agencies to identify ways to collaborate resources and programming to address underserved needs.

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

The City's 2015-16 Action Plan identified the following actions to be taken to address lead-based paint hazards.

- Housing Rehabilitation Program Delivery: The City developed lead safe housing checklists and procedures for the housing rehabilitation program managed by Community Services Consortium.
 - Lead hazard information is distributed to all applicants applying for the housing rehabilitation assistance and for any projects involving painted structures built before 1978.
 - Grant recipients sign a lead disclosure form and documentation of receipt of the Lead Safety brochure.

- When rehabilitation projects involve homes constructed before 1978, a lead paint inspection is conducted on surfaces that are proposed to be disturbed, or it is assumed that lead is present. If lead is present or presumed present, the Lead Paint Evaluation/Presumption notice is mailed to residents. The contractor will determine the amount of disturbance and decide if the contractors working on the site are required to be lead-certified and must comply with the EPA Renovate, Repair, and Painting laws in addition to HUD's federal regulations. If the project receives more than \$5,000 in assistance, a Risk Assessment report is completed. All contractors will use lead-safe work practices and interim controls or standard treatments must be taken on all applicable painted surfaces and presumed lead-based paint hazards by a qualified contractor.
- General Public Awareness: the City distributes lead hazard information pamphlets to residents seeking information about housing repairs to historic homes. The City provides links to lead safety information and brochures produced by the EPA and HUD from the City's website.

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

During the 2015 program year, the City took the following actions to reduce the number of poverty-level families in Albany:

- Increase Economic Opportunities: CDBG funding provided scholarships to low-income Albany residents to enroll in microenterprise courses to learn how to start a business. Funds also provided reduced tuition to Albany's low-income microenterprises to enroll in the Linn-Benton Community College Small Business Management Program and receive free one-on-one advising. In 2015, the City awarded two grants to start-up microenterprises to offset start-up costs. These two programs added nine full-time, low-mod jobs.
- Provide Public Services: in FY 2015, the City allocated 15% of its entitlement award to public service grants. Five agencies and programs were selected for funding and served 155 of Albany's lowest income residents, homeless residents, and at-risk children.

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

Albany is fortunate to have a strong institutional structure in place to coordinate delivery of services in the area. Representatives from the City of Albany, Linn and Benton Counties, Samaritan Health Services, Community Services Consortium (the community action agency), Linn Benton Housing Authority, Oregon State Extension, public service agencies and homeless and housing providers convene a few times a year to discuss issues and needs in the region. The Linn Benton Health Equity Alliance sponsors many events and discussions related to healthy homes and diversity that are well attended by public agencies and service providers. Many agencies serve on the Homeless Enrichment and Rehabilitation Team (HEART) to address issues related to homelessness.

The City continued to partner with many agencies through the City's CDBG grant programs, which helped to strengthen the institutional structure. The City also worked with subrecipients to ensure successful implementation of their programs to achieve the desired outcomes.

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

In FY 2015, the City took the following actions to enhance coordination between public and private housing and social service agencies:

- Staff consulted with the local housing authority, Linn Benton Housing Authority, and Linn County Mental Health to discuss needs of Albany's residents with mental disabilities.
- City staff met with staff of the local community action agency, Community Services Consortium, to discuss affordable housing needs, housing rehabilitation, lead-safe housing standards, fair housing, and homelessness. The City has a CDBG subrecipient contract with Community Services Consortium to provide housing rehabilitation programs.
- City representatives participate in the Homeless Enrichment and Rehabilitation Team (HEART) meetings. HEART is comprised of various social service, health, housing, homeless advocates, and governmental agencies that work collaboratively to identify the needs of Albany's homeless and at-risk residents.
- Staff attended regional meetings to foster coordination between housing and social service agencies. Fortunately, other agencies are also working to make these connections, such as the Linn Benton Health Equity Alliance, the Linn Benton Housing Authority, and the Community Services Consortium.

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

The City took the following action in FY 2015 to overcome the effects of impediments identified in *Albany's Analysis of Impediments to Fair Housing Choice and Plan* adopted in 2015.

- Lack of Understanding of Fair Housing Laws: The City hosted a forum on the history of fair housing sponsored by the Community Services Consortium. About 20 residents and agency representatives attended the forum. The Fair Housing Council of Oregon's traveling exhibit on the history of housing discrimination was installed in the Albany City Hall lobby for the public to view for three weeks.
- Linguistic and Cultural Barriers: The City of Albany has a fluent Spanish-speaking staff member that was able to communicate with several residents about housing conditions that were reported and to provide fair housing brochures. The City also hired a translator to translate housing rehabilitation program brochures.
- Discriminatory Housing Rental Practices: The Community Services Consortium (CSC) received a grant to provide housing discrimination call intake. CSC received 25 calls from Albany residents between January 1 and June 30, 2016. Three calls were referred to the Fair Housing Council of Oregon. Gender identity, disability discrimination, and reasonable accommodation assistance were the valid responses. City staff monitored online housing ads and called or sent letters to three rental management companies or owners when discriminatory elements were identified. CSC staff also monitored rental housing ads in Linn County in February and found 20 ads with potentially discriminatory elements. Discriminatory language primarily related to familial status and disabilities. The City favorably resolved a complaint by a Hispanic resident regarding move-out charges.

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

A: Pre-Assessment: During the application process for Albany CDBG funding, subrecipients were evaluated on the capacity of the organization and the organization's ability to meet national objectives, federal regulations, and complete the project. The City provides a Subrecipient Handbook to all potential applicants to review prior to submitting requests for funding.

B: Subrecipient Orientation: City staff met with each subrecipient agency prior to signing the contract to discuss the scope of work, federal regulations, performance measures, and to go over the Subrecipient Handbook. Staff also reviewed all contractual obligations and specifies applicable federal requirements, how to document national objectives compliance, and overall administrative and financial management record keeping.

C: Quarterly Monitoring: The City requires subrecipients to submit quarterly reports in order to monitor progress and identify issues on an on-going basis and offer technical assistance to subrecipients as needed. Quarterly reimbursement requests are also encouraged so that financial records can be monitored quarterly.

D: Risk Assessment for In-Depth On-Site Monitoring: The City developed risk assessment criteria to determine which subrecipients to monitor in depth each year.

1. Quarterly Desk Review Findings. More than two consecutive errors, incomplete reports, or re-submittals will trigger a technical assistance site visit and may be grounds for monitoring.
2. New Subrecipients or Organizational Change. First time CDBG subrecipients, or subrecipients experiencing organizational change or key program staff turnover, will be considered higher risk subrecipients.
3. Performance and Administrative History. Subrecipients with previous findings or concerns are considered higher risk and will be monitored to ensure corrective actions have not been fully implemented.
4. Complexity of the Activity. Housing rehabilitation programs and economic development programs have complex federal regulations, and by their nature are the highest risk programs. When housing rehabilitation projects include houses constructed before 1978, at least one project is monitored for lead-based paint compliance.

While certain activities or programs are more complex and may present more risk than others, the City will make every effort to monitor every organization once in a three year cycle.

In 2015, the City monitored the first housing rehabilitation grant to ensure compliance with lead-safe housing standards, lead paint testing, resident notices, or evaluation and clearance exams. Staff monitored the file for compliance with notifications, lead testing, and clearance exams, and had no findings or areas of concern.

The City is scheduling a monitoring visit with public service agency CASA of Linn County, a new grant subrecipient, and will monitor Linn Benton Community College due to staff changes and complexity of program delivery.

Lead Paint Monitoring: The HUD 2015 monitoring visit found that the City's monitoring forms were not adequate to ensure that lead-based paint hazard reduction standards were followed on-site with the housing rehabilitation projects. To ensure compliance with lead based paint standards, the City developed a step-by-step instruction guide and process checklists regarding lead based paint requirements for housing rehabilitation projects. At least one housing rehab project will be monitored annually using the HUD lead-paint monitoring forms to ensure future compliance with all federal lead-based paint regulations.

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.

A notice of the 30-day comment period and Albany City Council public hearing on Albany's 2015 CAPER was distributed to the local newspaper, the Albany Democrat Herald, on August 25, 2016. The City distributed press releases on the CAPER and posted the notice on the City's website. The press release was also distributed to an email list of local service and housing agencies. The CAPER was available online and in print at Albany's two public libraries and also at Albany City Hall beginning August 25, 2016.

All meetings of the Community Development Commission are open to the public and the agendas and agenda packets are available on the City's website. Citizens are welcome to attend all meetings.

At the September 28, 2016 hearing, the City Council accepted citizen input on the 2015 CAPER and on community development needs that could be addressed in future action plans and on the City's performance in administering the CDBG programs. One person spoke at the Council hearing in support of the City's CDBG programs, Andrea Myhre, Associate Director, Jackson Street Youth Services.

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.

After three years of being a CDBG entitlement city, the City of Albany staff has a better understanding of applicable national objectives for activities, complexity of projects involving wetlands, and what programs are effectively addressing the needs of Albany's low-income residents. Consequently, the City is considering amendments to the following programs:

Economic Development – Commercial Rehabilitation: The City started a small grant program available to new businesses to offset start up costs. Initially, the City thought the grants could help businesses remove blighting conditions in Albany's low-income Census tracts through building improvements. However, grant funds are too small for building rehabilitation. In addition, there is urban renewal financial assistance for improvements to buildings located within the urban renewal district. The City will amend the Consolidated Plan in year four to remove the commercial rehabilitation goal to improve two commercial buildings.

Housing Rehabilitation – In General: The City's housing market analysis identified thousands of aging housing units and households that are experiencing housing cost burden. The rehabilitation loan program was designed to improve the quality and affordability of Albany's housing stock. Due to the economic downturn and extremely low-incomes of residents, the City has found less demand for loans than originally anticipated. The City has changed the essential repairs grant program to offer larger grants that can be used for housing rehabilitation. This shift should enable the City to meet the housing rehabilitation objectives in the Consolidated Plan for owner-occupied units, where the demand is greatest.

Housing Rehabilitation – Rental Units: Due to the challenges of ensuring rental units remain affordable for a minimum time period, and the limited amount of funding, it is unlikely the City will be able to rehabilitate 20 rental units in the 2013-2017 Consolidated Plan time period.

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

No.

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

Not applicable.