



# Annual Action Plan

The CPMP Annual Action Plan includes the SF 424 and Narrative Responses to Action Plan questions that CDBG, HOME, HOPWA, and ESG grantees must respond to each year in order to be compliant with the Consolidated Planning Regulations.

## Narrative Responses

### ACTION PLAN

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

#### **Executive Summary 91.220(b)**

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

#### **Program Year 3 Action Plan Executive Summary:**

During the previous year (Program Year 2 or 2011/12), the City of Sparks, Nevada was successful in implementing the majority of its (amended) Action Plan. Sparks provided funding for Fair Housing activities and Continuum of Care strategic planning, provided loans and grants to income-eligible households for housing rehabilitation through City-administered Single Family, Owner-Occupied Housing Rehabilitation Loan and Emergency Grant programs, completed much-needed sidewalk and other pedestrian improvements in an eligible low/mod income neighborhood and provided funding for operation of the Community Assistance Center (the regional homeless shelters for men, women and families).

In Program Year 3 (2012/13), the City of Sparks remains committed to using funds from the U.S. Department of Housing and Urban Development to improve the quality of life in our community and address the needs of low and moderate income persons and households. The City of Sparks is also a member of the Washoe County HOME Consortium (WCHC), for which the City of Reno serves as the lead entity, and through this partnership HOME Investment Partnership Program dollars continue to be invested in Washoe County projects that increase affordable housing opportunities for low- and moderate-income households.

This Annual Action Plan outlines the activities the City of Sparks will undertake in Year 3 of the Consolidated Plan, leveraging Community Development Block Grant funding to address housing, public services and homelessness prevention under the objectives of a suitable living environment and decent housing. For federal Fiscal Year (FY) 2012, the City of Sparks has been allocated \$574,145 in new Community Development Block Grant (CDBG) funding. In addition, the City of Sparks proposes to reprogram \$49,097 that was not used in Year 2 (FY 2011). Combined, these funds total \$623,242 which the City of Sparks proposes to use as follows:

- ◆ Up to \$114,829 for Planning and Administrative activities including Fair Housing and Continuum of Care
- ◆ Up to \$99,000 for the City sponsored Single Family, Owner-Occupied Housing Rehabilitation Loan and Emergency Grant programs. (In addition, the City is carrying over approximately \$172,293 from the previous year for this activity and is anticipating approximately \$12,000 in program income that would be used for this program.)
- ◆ Up to \$343,292 (\$299,195 from FY 2012 funds and \$44,097 in reprogrammed funds) for Pedestrian Improvements
- ◆ Up to \$86,121 for operation of the Community Assistance Center (homeless shelters)

The City is also carrying forward \$188,000 from a previous year to complete certain facility improvements at the Community Assistance Center in Reno and, as noted above, \$172,293 for its housing rehabilitation program.

The WCHC will invest HOME and leveraged funds for development of 1 multi-family and 5 scattered site rental projects.

### **Citizen Participation 91.200 and 91.220(b)**

2. Provide a summary of the citizen participation and consultation process (including efforts to broaden public participation in the development of the plan.
  - a. Based on the jurisdiction's current citizen participation plan, provide a summary of the citizen participation process used in the development of the consolidated plan. Include a description of actions taken to encourage participation of all its residents, including the following:
    1. low- and moderate-income residents where housing and community development funds may be spent;
    2. minorities and non-English speaking persons, as well as persons with disabilities;
    3. local and regional institutions, the Continuum of Care, and other organizations (including businesses, developers, nonprofit organizations, philanthropic organizations, community and faith-based organizations);
    4. residents of public and assisted housing developments and recipients of tenant- based assistance;
    5. residents of targeted revitalization areas.

b. Identify agencies, groups, and organizations that participated in the process. This should reflect consultation requirements regarding the following:

1. General §91.100 (a)(1) - Consult with public and private agencies that provide health services, social and fair housing services (including those focusing on services to children, elderly persons, persons with disabilities, persons with HIV/AIDS and their families, homeless persons) during the preparation of the plan.
  2. Homeless strategy and resources to address needs of homeless §91.100 (a)(2) – Consult with continuum of care, public and private agencies that address the housing, health, social services, victim services, employment, or education needs of low-income persons, homeless persons (particularly chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth) and person at risk of homelessness; publicly funded institutions and systems of care that may discharge persons into homelessness (such as health-care facilities, mental health facilities, foster care and other youth facilities, and corrections programs and institutions), and business and civic leaders.
  3. Metropolitan planning §91.100 (a)(5) -- Consult with adjacent units of general local government, including local government agencies with metropolitan-wide planning responsibilities, particularly for problems and solutions that go beyond a single jurisdiction, i.e. transportation, workforce development, economic development, etc.
  4. HOPWA §91.100 (b)-- Largest city in EMSA consult broadly to develop metropolitan-wide strategy for addressing needs of persons with HIV/AIDS and their families.
  5. Public housing §91.100 (c) -- Consult with the local public housing agency concerning public housing needs, planned programs, and activities.
3. Provide a summary of citizen comments or views on the plan.
  4. Provide a written explanation of comments not accepted and the reasons why these comments were not accepted.

**Program Year 3 Action Plan Citizen Participation response:**

2. Summary of citizen participation process.

Sparks' Community Services staff review citizen identified areas of need with capital projects staff to determine CDBG eligibility. In addition, information is solicited from the Sparks' Disabled Advisory Committee to identify areas throughout the community needing accessibility improvements.

The City of Sparks partners with the City of Reno and Washoe County to allocate funds on a regional basis for affordable housing projects through the Washoe County HOME Consortium (WCHC). The WCHC process for allocation of HOME funding includes regular outreach to organizations involved in providing transitional and permanent affordable housing. The Washoe County HOME Consortium follows an allocation process outlined in the Citizen Participation Plan. The Technical Review

Committee (TRC) holds public hearings regarding the project and program proposals that were received in response to the WCHC request for proposals. The WCHC's Directors hold a public meeting to approve and forward the TRC recommendations to the Regional Planning Governing Board.

Sparks' CDBG administrators and housing staff work closely together. Sparks' housing specialist is bilingual and other bilingual City staff have been identified to assist Spanish speaking clients when needed.

Pursuant to the adopted Citizen Participation Plan, the City of Sparks made a draft of the Action Plan available for public comment for a 30-day period of time, beginning April 13, 2012. The location and times of the public hearing, as well as a notice of the availability of the draft document, were advertised in the Reno Gazette Journal and Sparks Daily Tribune and posted throughout the City in accordance with the existing Citizen Participation Plan.

3. Any comments received by the time of the public hearing will be conveyed to the Sparks City Council at the public hearing (scheduled for May 14, 2012) and addressed as appropriate.

4.

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

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

6. Explain how federal funds will leverage resources from private and non-federal public sources, including how matching requirements of HUD programs will be satisfied.

### **Program Year 3 Action Plan Resources response:**

For federal Fiscal Year (FY) 2012, the City of Sparks has been allocated \$574,145 in new Community Development Block Grant (CDBG) funding. In addition, the City of Sparks proposes to reprogram \$49,097 that was not used in Year 2 (Program Year 2011/12). Combined, these funds total \$623,242. Other CDBG funds (approximately \$360,293) were allocated to the City in previous fiscal years and will be used to complete activities approved by HUD in the Year 2 Action Plan. Finally, the City anticipates a total of \$12,000 in program income from its housing rehabilitation loan program will be available for re-use by that program.

The Washoe County HOME Consortium, a partnership between Washoe County and the cities of Reno and Sparks, anticipates receiving \$1,015,526 in FY 2012.

In addition to HUD grant funds the following resources will be available to the City and WCHC for activities in the Year 3:

*City General Funds.* In addition to the direct allocation of ESG funds, the City anticipates budgeting approximately \$86,000 for public services to serve low and moderate income individuals.

*Washoe County HOME Consortium State of Nevada pass-through HOME grant.* In addition to the HOME grant from HUD, the Consortium receives a pass-through allocation of HOME from the State of Nevada. Estimated at \$292,127.

*Low Income Housing Trust Funds.* LIHTF funds are generated by the State through a real estate transfer tax. The funds are allocated to eligible projects and programs that will provide quality affordable housing to households at or below 60 percent of median income. Estimated at \$166,732.

The WCHC and City of Sparks use the local resources described above to leverage the HUD funding allocations. In some cases, leveraged resources are invested alongside HUD funds within projects. In other cases eligible, local projects and programs are funded entirely with non-HUD monies. In either case, the local funds support HUD-funded activities by contributing to the goals of the Consolidated and Action Plan by providing necessary financial resources.

#### *HUD Match Requirements*

#### HOME

The funding sources that will generate funds for the match requirement are Low Income Housing Trust Funds from the State of Nevada and the value of the property tax exemptions provided to federally-funded affordable housing projects.

### **Annual Objectives 91.220(c)(3)**

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

<input type="checkbox"/>	<b>Objective Category Decent Housing</b> Which includes:	<input type="checkbox"/>	<b>Objective Category: Suitable Living Environment</b> Which includes:	<input type="checkbox"/>	<b>Objective Category: Expanded Economic Opportunities</b> Which includes:
<input checked="" type="checkbox"/>	assisting homeless persons obtain affordable housing	<input checked="" type="checkbox"/>	improving the safety and livability of neighborhoods	<input type="checkbox"/>	job creation and retention
<input checked="" type="checkbox"/>	assisting persons at risk of becoming homeless	<input checked="" type="checkbox"/>	eliminating blighting influences and the deterioration of property and facilities	<input type="checkbox"/>	establishment, stabilization and expansion of small business (including micro-businesses)
<input type="checkbox"/>	retaining the affordable housing stock	<input checked="" type="checkbox"/>	increasing the access to quality public and private facilities	<input type="checkbox"/>	the provision of public services concerned with employment
<input checked="" type="checkbox"/>	increasing the availability of affordable permanent housing in standard condition to low-income and moderate-income families, particularly to members of disadvantaged minorities without discrimination on the basis of race, color, religion, sex, national origin,	<input type="checkbox"/>	reducing the isolation of income groups within areas through spatial deconcentration of housing opportunities for lower income persons and the revitalization of deteriorating neighborhoods	<input type="checkbox"/>	the provision of jobs to low-income persons living in areas affected by those programs and activities under programs covered by the plan

	familial status, or disability				
<input checked="" type="checkbox"/>	increasing the supply of supportive housing which includes structural features and services to enable persons with special needs (including persons with HIV/ADOS) to live in dignity and independence	<input type="checkbox"/>	restoring and preserving properties of special historic, architectural, or aesthetic value	<input type="checkbox"/>	availability of mortgage financing for low income persons at reasonable rates using non-discriminatory lending practices
<input checked="" type="checkbox"/>	providing affordable housing that is accessible to job opportunities	<input type="checkbox"/>	conserving energy resources and use of renewable energy sources	<input type="checkbox"/>	access to capital and credit for development activities that promote the long-term economic social viability of the community

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

The WCHC is focusing its efforts on serving those most in need through the support of activities that increase the availability of affordable housing opportunities, including the development of rental units targeting households earning not more than 40% of the Area Median Income, and rental assistance for those experiencing homelessness. In considering housing developments for funding, their proximity to services and employment opportunities is considered. One housing development project funded this year, which is to be located in Sparks, has an agreement with a local service agency to provide units for supportive housing. Substantial resources are also used to support services for individuals experiencing homeless.

The City of Sparks will be using a portion of the annual entitlement funds to continue its Single Family Owner-Occupied Housing Rehabilitation program, identified as a priority need under decent housing. The Single Family Owner-Occupied Housing Rehabilitation program is comprised of two elements.

The first is the Deferred Payment Loan program which is designed to assist low income (less than 80% of area median income) owner/occupants residing within the City of Sparks to correct housing deficiencies and addressing items deemed essential for health, safety and welfare. The second is The Emergency Repair Grant which is designed to assist owner/occupants at or below 60% of area median income, and residing within the City of Sparks, to make immediate corrections or necessary repairs to their homes.

CDBG Funds will be used to improve the pedestrian environment and enable persons with disabilities to able to more readily move around one of Sparks oldest neighborhoods through sidewalk, pedestrian ramp and related improvements. This area's boundaries are Pyramid Way on the west, Prater Way to the north, 4<sup>th</sup> Street to the east and Victorian Avenue on the south

### **Description of Activities 91.220(d) and (e)**

8. Provide a summary of the eligible programs or activities that will take place during the program year to address the priority needs and specific objectives identified in the strategic plan, the number and type of families that will benefit from the proposed activities, proposed accomplishments, and target date for the completion of the activity.

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

Decent Housing:

**Goal 1.** Expand affordable rental housing opportunities for extremely and very low-income households, including those with special needs.

- *Objective DH 2.1 (Affordability of Decent Housing).* Develop and/or rehabilitate rental units that are affordable to households earning 50 percent of the area median income (AMI) and less.

*Performance measure:* Construct or rehabilitate 155 units during the 5 year period.

*Year 3 (2012/13) outcomes:*

- Aspen Village—new construction of a 43 unit apartment complex serving families at or below 40 percent of the area median income (AMI), with 11 HOME assisted units within the complex. Construction to begin March 2013, complete December 2013.
  - HOME – \$975,000 CHDO set-aside
- Oliver-Montello Neighborhood Infill Project – new construction of four three-bedroom single family homes for rent by families at or below 50% of the area median income. Construction to begin October 2012, complete May 2013.
  - HOME – \$555,922

**Goal 2.** Stabilize neighborhoods and increase appropriate housing opportunities for low and moderate income households, including those with special needs.

- *Objective DH-1.2 (Availability/Accessibility of Decent Housing).* Assist owner occupied households with needed improvements to their homes, including accessibility improvements for disabled households and seniors. To do so, the City of Sparks the City of Sparks will continue to provide its Single Family, Owner-Occupied Housing Rehabilitation Home Loan and Emergency grant program. The City's program consists of two options serving qualifying low-income residents within the City of Sparks as follows:

Housing Rehabilitation Deferred Loan Program – A no interest, no monthly payment, deferred loan agreement between the City of Sparks and a qualifying homeowner-occupied household in the City of Sparks for a maximum of \$20,000 (hard & soft costs).

Emergency Repair Grant (ERG) – A onetime grant opportunity of \$2,500 for qualifying homeowner-occupied households with a



verifiable emergency repair item (non-luxury, health & safety issue).

Funded with CDBG dollars, this program allows qualifying households to undertake housing repairs such as roofing, siding, plumbing, electrical, heating and weatherizing. Due to weather extremes in northern Nevada, the need for such repairs is common but often unaffordable for low-income households, many with elderly or disabled members. By providing these loans and small dollar emergency grants the City is working toward the goal of sustaining affordable housing and prevention of displacement.

*Performance measure:* loans or grants to at least 10 households in Year 3.

- *Year 3 (PY 2012/13) outcome:* Make a combination of deferred loans and emergency repair grants.
  - CDBG – \$74,000 in FY 12 funding plus \$172,293 in prior funding and \$12,000 in program income (\$263,293 total).
- *Objective DH-1.3 (Availability/Accessibility of Decent Housing).* Provide deposit and rental assistance to low and moderate income renter households.

*Performance measure:* 100 income qualified clients will be provided assistance during 5 year period.

- *2012 PY outcome:* Provide rental/utility deposit assistance and/or monthly rental assistance for up to 30 families at or below 30% of the area media income. To begin in Fall of 2012 and completed Fall 2013.
  - LIHTF – \$600,000 (includes prior funding)

An existing program that provides one-time rental and utility deposits for clients coming out of the Community Assistance Center will continue with the remainder of previously allocated Low Income Housing Trust Funds, approximately \$48,000.

### **Suitable Living Environment:**

**Goal 3.** Support organizations that provide supportive services to the region's lowest income residents and residents with special needs.

*Performance measure:* 580 clients will be assisted with funding provided during the 5 year period.

- *Objective SL-1.6 (Availability/Accessibility of Suitable Living Environment).* Support the operations of the Community Assistance Center, which provides shelter and temporary housing to low and moderate income individuals and families who are homeless.



- *2012 PY outcome:* Support organizations that provide shelter and services to individuals and families experiencing homelessness: Community Assistance Center program year completed June 2013.
- CDBG – \$86,121 (from the City of Sparks; Reno is providing additional CDBG and ESG funds)

**Goal 4.** Support quality living environments of low- and moderate-income households through infrastructure improvements and blight reduction.

- *Objective SL-1.7 (Availability/Accessibility of Suitable Living Environment)* Pedestrian improvements to be undertaken in a targeted Low/Mod Income neighborhood. The improvements may include, but are not limited to: removal of existing curb, gutter, sidewalk, retaining wall, landscaping, and fencing; construction of new curb, gutter, sidewalk, handicap ramps, fencing, concrete retaining wall; landscape and irrigation improvements; installation of new street lights; and all appurtenant work necessary to complete the project.

*Performance measure:* Pedestrian improvements along at least 8 city blocks.

- *2012 PY outcome:* Pedestrian Improvements to be completed by Spring 2013.
- CDBG – \$343,292 including \$44,097 in reprogrammed funds from a previous year

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

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

While the federal funds received through HUD will be used to provide affordable housing, public services and housing rehabilitation throughout the city for low and moderate income households, the City has identified a target area for the physical improvements (pedestrian improvements specifically) it will undertake in 2012-13 (and probably for the balance of the current 5 year Consolidated Plan period). This targeted project area was identified as in low-income area, meeting the LMI area benefit under the suitable living environment objective and availability/accessibility outcome, and is bound by Pyramid Way on the west, Prater Way to the north, 4<sup>th</sup> Street to the east and Victorian Avenue on the south. Although numerous needs were identified within the community, limited human and financial resources made it necessary to prioritize those housing, economic development, and community development projects that will have the biggest impact for the community and best leverage the available resources.

Projects undertaken in low-income neighborhoods are intended to improve the quality of life through reinvestment and removal of blighting conditions and through provision of affordable, quality living opportunities. The City of Sparks proposes to dedicate approximately 52 percent of the FY 2012 CDBG funds allocated to it for the target area Pedestrian Improvements. Of the total CDBG funding available to the City, including CDBG funding from previous years' allocations, 35 percent are proposed to be used in the target area.

10. Describe the reasons for the allocation priorities, the rationale for allocating investments geographically within the jurisdiction (or within the EMSA for HOPWA) during the next year, and identify any obstacles to addressing underserved needs.

Allocations of resources, from all sources, are made annually based upon evaluations of current circumstances and needs. For grant funds this process takes into account regulatory requirements, goals established in the Consolidated Plan, awareness of community initiatives and City Council priorities.

In the case of the target area selected for physical (pedestrian) improvements, the City's Strategic (Consolidated) Plan for Program Years 2010 to 2014, and the City's original Annual Action Plan for Program Year 2011, designated eligible low/mod census tracts in a target area referred to as the West End for pedestrian improvements. As designated in those plans the area's boundaries are Oddie Boulevard to the north, Pyramid Highway to the east, I-80 to the south and El Rancho Boulevard to the west. The next priority was projects located in qualifying low/mod census tracts outside of the West End, but located within either of the City's redevelopment areas. Finally, projects in qualifying low/mod census tracts located in all other areas of the city are to be considered.

The 2010 Census low and moderate ("low-mod") income data released by HUD after submittal of the Program Year 2011 Annual Action Plan revealed that certain areas in west Sparks that qualified as low-mod income based on 2000 Census data no longer qualify as such. One such neighborhood was the area identified in the City's original Annual Action Plan for Program Year 2011/12: 17<sup>th</sup> Street between Oxford Avenue and Greenbrae Drive; Prospect Avenue and Oxford Avenues between 17<sup>th</sup> Street and Rock Blvd; and Sbragia Way and Russell Way between Rock Blvd and 9<sup>th</sup> Street.

Accordingly, during Year 2 (Program Year 2011/12) the City submitted, and HUD approved, an Action Plan Amendment to designate a different area as the site for the City's pedestrian improvements activities. This area's boundaries are Pyramid Way on the west, Prater Way to the north, 4<sup>th</sup> Street to the east and Victorian Avenue on the south and this area remains the target for Year 3 (2012/13)

Affordable housing allocations are determined through a multi-step process in response to applications submitted. The WCHC Technical Review Committee (TRC), comprised of one staff and one community representative from each jurisdiction plus one at-large member and a representative of the Truckee Meadows Regional Planning Agency, receives, evaluates and makes funding recommendations, which includes Participating Jurisdiction HOME money, State HOME money, and Low Income Housing Trust Funds. These recommendations are forwarded to the WCHC Directors for approval and forwarding to the Regional Planning Governing Board for ratification. During this process proposed projects and programs are evaluated for compliance and addressing the identified needs and goals.

The most significant obstacle to meeting the needs of the community is limited resources, which are insufficient to address the myriad challenges local governments in Nevada are facing as a result of the ongoing economic and fiscal crises.

### **Annual Affordable Housing Goals 91.220(g)**

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

The annual affordable housing goals are:

- Homeless – 50 households assisted through deposit and rental assistance funded with ESG and local resources.
- Non-homeless – 16 households will be assisted through the development of new affordable rental units funded with HOME.

### **Public Housing 91.220(h)**

12. Describe the manner in which the plan of the jurisdiction will help address the needs of public housing and activities it will undertake during the next year to encourage public housing residents to become more involved in management and participate in homeownership.
13. If the public housing agency is designated as "troubled" by HUD or otherwise is performing poorly, the jurisdiction shall describe the manner in which it will provide financial or other assistance in improving its operations to remove such designation during the next year.

**Program Year 3 Action Plan Public Housing Strategy response:**

12. & 13. The Reno Housing Authority (RHA) serves the region by providing affordable rental units, administering the Section 8 tenant based rental assistance program, and supplying affordable lease-to-own and sale properties for low to moderate income families.

RHA owns and operates 750 Public Housing units; 285 of these units are designed for seniors and persons with disabilities. RHA also administers 2,647 Housing Choice Vouchers to low-income residents, along with 27 moderate rehabilitation units. In addition, RHA is a development partner in a Low Income Housing Tax Credit (LIHTC) property.

RHA is a model housing authority, having earned "high performer" status from HUD. RHA's most recent HUD inspection of its properties received scores of 92-100 out of 100 possible points. In 2008, RHA was recognized by HUD as the 2008 Large Housing Authority of the Year in Nevada and Northern California. This award was given to RHA by Stephen Schneller, the Director of HUD's Office of Public Housing in San Francisco. According to Mr. Schneller, RHA's properties are by and large the best he has seen throughout the country. In 2011, RHA was once again recognized by the San Francisco HUD Office as the 2011 Low Rent Public Housing Program of the Year.

RHA has a long history of providing self-sufficiency services to clients in the form of FSS, IDEA, and other homeownership programs. The city actively partners with RHA to continue to explore additional affordable housing development opportunities.

RHA has been able to maintain and make improvements to its Public Housing units through the Capital Fund program. On January 30, 2011, RHA received a Special Achievement Award for handling the American Recovery and Reinvestment Act funds so effectively and quickly.

RHA has completed the expenditures under an EDI grant received from HUD for the Oliver Montello neighborhood surrounding Pat Baker Park in northeast Reno. The City of Reno received the grant and entered into an Interlocal Agreement with RHA to effectively expend the funds. The grant's \$588,000 was combined with money provided by the Washoe County HOME Consortium for rehabilitation. In addition, RHA utilized some of its own funds to purchase other properties in the neighborhood. Most of the properties were rehabilitated and rented to low income families, but a few with extreme structural problems were demolished using RHA funding.

In 2011, RHA applied for funding from the Washoe County HOME Consortium to construct four attractive, energy efficient and barrier free single family homes on the vacant lots in the Oliver Montello neighborhood owned by RHA. Funding for RHA's application was approved by the Reno City Council in February 2012 and by Washoe County HOME Consortium in April 2012.

The City of Reno/Washoe County HOME Consortium entered into an Interlocal Agreement with RHA to administer over \$4.2 million in Neighborhood Stabilization Program 1 funds from the State of Nevada. This money has been used to purchase foreclosed properties for both a rental program and a first time homebuyer program in three target areas, including west Sparks.

In January 2010, a Consortium headed by RHA was awarded \$20,995,000 in Neighborhood Stabilization Program 2 (NSP2) grant funding. These funds are being used to purchase and rehabilitate up to 200 single family homes in four target areas. These homes will be rented, sold, or used in a lease-to-own program to people under 120% of the AMI.

The Consortium is made up of RHA, the City of Reno as the lead agency of the Washoe County HOME Consortium, Nevada Rural Housing Authority, Charles Schwab Bank, and the Financial Guidance Center (formerly Consumer Credit Affiliates). The City of Reno is providing much needed environmental review services to clear each house before purchase. Nevada Rural Housing Authority is providing their experience with selling homes to middle income homebuyers and may utilize their first time homebuyer program for qualified applicants. Charles Schwab Bank is expected to finance many of the home loans, and the Financial Guidance Center is providing HUD-required credit counseling for prospective homeowners. Each member of the Consortium is a valued and necessary piece of successfully expending the NSP2 grant.

RHA has received national recognition for its handling of purchasing, rehabilitating and renting properties using NSP2 grant funding. In December 2011, HUD released a training video that was commissioned by the Enterprise Community Partners which focused entirely on RHA's approach to managing scattered-site, single family rentals. The training video can be accessed by using the following link:

<http://hudnsphelp.info/index.cfm?do=viewResource&ResourceID=1157>

Washoe County and the Cities of Reno and Sparks also designated RHA to act on their behalf in purchasing homes from HUD under the \$1 Good Neighbor Program. RHA purchased 22 houses under this program. All properties underwent significant rehabilitation with RHA funds before being rented or sold.

For several years RHA has wanted to participate in HUD's demonstration Moving To Work Program and a formal application will be submitted in June 2012 under Notice PIH-2012-16. This will allow RHA considerable flexibility in developing local rental programs. Washoe County HOME Consortium is supportive of RHA's efforts to achieve this designation, and will assist wherever possible.

## **Homeless and Special Needs 91.220(i)**

14. Describe, briefly, the jurisdiction's plan for the investment and use of available resources and one-year goals for reducing and ending homelessness.

Through a regional partnership led by the City of Reno, there is a growing emphasis on supporting programs that rapidly re-house homeless individuals and families, programs that demonstrate success in moving people into housing and programs that can help households maintain housing, while acknowledging the dearth of housing available to such households. As a result both emergency shelter operations and a re-housing program will be funded through regional partnerships during the program year. It is anticipated 580 individuals will be provided shelter and 100 households will be re-housed. The goals of these projects are to prevent homelessness, and assist individuals and families find permanent housing and regain self-sufficiency.

15. Describe specific action steps for reducing and ending homelessness that (i) reach out to homeless persons (especially unsheltered persons) and assessing their individual needs; (ii) address emergency shelter and transitional housing needs; (iii) help homeless persons (especially persons that are chronically homeless, families with children, veterans, and unaccompanied youth) make the transition to permanent housing and independent living.

In planning for the use of funds it was evident that resources for shelter operating expenses are still needed. As a result Washoe County, Reno and Sparks will continue to support shelter programs during the program year but expect shelters to work towards moving their clients into permanent affordable housing.

A major achievement in addressing past and current goals to address homelessness in the region is the construction of the Community Assistance Center (CAC). This was a partnership between the City of Reno, the City of Sparks, Washoe County and a number of community organizations and private foundations. The first phase was completed in November 2005 and included a men's shelter, the Reno Sparks Gospel Mission program building and St. Vincent's Dining facility. In September 2008, a women's shelter, family shelter and resource center were completed. The entire CAC serves as a "one-stop" service center for individuals and families experiencing or at-risk of homelessness.

In Year 3 the City of Sparks intends to fund approximately \$188,000 in physical improvements for the CAC. This funding, which was included in the amended Year 2 Action Plan, had previously been allocated for Community Assistance Center construction costs but remains unspent. The proposed improvements are primarily intended to enhance security and include a new gate and cameras to protect the CAC facility and its clientele. The proposed cameras and replacing the current rear manual gate with an electronic gate is expected to enable the CAC operator to significantly enhance security without additional security personnel, the cost of which would divert resources from the CAC's other operational needs.

The City of Reno, City of Sparks, and Washoe County jointly fund operation of the Community Assistance Center, which includes single adult shelters for men and women and a family shelter, the Tom Vetica Resource Center, and on-site security. The campus serves individuals and families experiencing or at-risk of homelessness by providing access to communication services, employment assistance, resource information, social service applications, free clothing, general and mental health services, educational opportunities, and a variety of outreach services from other community organizations.

CAC Operations  
*City of Sparks Funds:*  
\$84,976 – CDBG

*Leveraged Funds:*  
\$ 89,000 City of Reno ESG  
\$ 464,033 City of Reno CDBG  
\$ 1,208,368 Washoe County General Fund  
\$ 65,489 Nevada Housing Division ESG



16. Homelessness Prevention—Describe planned action steps for reducing ending homelessness that help low-income individuals and families avoid becoming homeless, especially extremely low-income individuals and families who are likely to be discharged from publicly funded institution and systems of care or those receiving assistance from public or private agencies that address housing, health, social service, employment, education or youth needs.

The City of Sparks will not be allocating direct funding to homeless prevention programs. However, it is anticipated that through funding additional affordable housing opportunities in the community the need for homeless prevention funds will be reduced. The WCHC's policy requires that 20% of all funded units target households earning not more than 30% of the AMI. In addition, funding provided to the operation of the Community Assistance Center and Tom Vetica Resource Center will allow other vital community services to continue and will allow for enhanced community collaboration.

The City of Sparks participates in the Reno Area Alliance for the Homeless (RAAH), the local Continuum of Care (CoC). RAAH is working with the other Nevada CoCs to re-establish the Statewide Interagency Council on Homelessness which was disbanded in 2011. It is a primary goal to have the Council address discharge planning with all types of institutions.

17. Describe specific activities the jurisdiction plans to undertake to address the housing and supportive service needs of persons who are not homeless (elderly, frail elderly, persons with disabilities, persons with HIV/AIDS, persons with alcohol or other substance abuse problems).

While staff continues to participate in a variety of community initiatives to address the non-homeless special needs populations there are no funds allocated specifically for that purpose. One WCHC funded housing development does have an agreement with the local HIV/AIDS service provider to make 9 units available to clients in their programs.

## **Barriers to Affordable Housing 91.220(j)**

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

**Program Year 3 Action Plan Barriers to Affordable Housing response:** The current AI identified a number of barriers to affordable housing and fair housing; however, the barriers were not specifically related to public policies affecting the cost of housing development. The City will work to mitigate any discrimination and fair housing violations in its rental market through landlord education and outreach and making residents aware of their rights under fair housing law. The following actions are to be carried out in partnership with Silver State Fair Housing Council (SSFHC) during the period covered by this Strategic Plan:

1. Provide at least four (4) presentations/outreach events to community groups about fair housing rights and responsibilities; at least two (2) presentations to



housing providers about fair housing law, including fair housing for persons with disabilities.

2. Create links from City website(s) to SSFHC website; identify locations at City facilities for placement of SSFHC brochures and contact information; provide training opportunities for City staff receiving inquiries from the public and/or administering housing programs; collaborate with City efforts to educate the public about housing programs, as possible.
3. Conduct a Fair Housing Poster Contest for Washoe County schoolchildren; display entries throughout the community. Develop and print a fair housing poster and fair housing calendars for community-wide distribution.
4. Design and create a mobile fair housing exhibit incorporating information about fair housing rights and SSFHC services for placement in public locations throughout the community.
5. Conduct accredited ABCs of Fair Housing class for Washoe County real estate professionals and property managers.

### **Other Actions 91.220(k)**

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

The State of Nevada has been among the hardest hit states during the economic downturn. The City of Sparks has sharply reduced its budget and staffing levels since FY 2008-2009 due to over four years of declining sales and property taxes. Nevertheless, the City continues to leverage its CDBG dollars with funding from the City (including utility funds), from the Sparks Redevelopment Agency and from other state and federal grants to pay for capital improvements. In this manner local funds support HUD-funded activities by contributing to the goals of the Consolidated and Action Plans.

The most recent Analysis of available blood lead data in Washoe County is from 2005-2007 on children with blood lead levels ordered by a healthcare provider for laboratory testing. These results indicated that 4-5% of all blood lead tests were elevated at levels associated with adverse effects (adults  $\geq 25\mu\text{g/dL}$  and children  $\geq 5\mu\text{g/dL}$ ). There was a decreasing trend of 5.2%, 4.2% and 2.9% (in 2005, 2006, 2007 respectively) in percent elevated. Only 1.5% had a level greater than or equal to 10  $\mu\text{g/dL}$ . This small sample survey cannot be considered representative of the population and cannot be used to formulate policy; however the data are the only source of preliminary prevalence data (References: Williamson, Virginia, Lead Exposure in Northern Nevada, Master's Thesis, UNR, 2009; EPI-News, April 17, 2009, Vol 29, No. 7). Over the past 7.5 years, Washoe County Health District typically receives 1-3 referrals for elevated BLL over 10 $\mu\text{g/dL}$ .

Based upon the 2006-2008 ACS data, approximately 38 percent of the City of Sparks 35,356 housing units were built pre-1979. Of those units, an estimated 10 percent were built prior to 1949 when lead based paint was most prevalent. It is anticipated that clients who apply to the City of Sparks Housing Rehabilitation program may own a home from this older housing stock and, therefore, potentially have a lead based paint hazard in their home. As a requirement of the City's Housing Rehabilitation program, all clients are presented with lead information in compliance with HUD guidance. This information is reviewed with the clients who also sign documentation indicating their receipt of the information and review of the potential hazards.

In addition, the City of Sparks contracts with Wise Consulting & Training, a Nevada Certified Environmental management company specializing in mold, asbestos, lead, radon and indoor air quality inspection and an analysis. Wise Consulting is hired as needed to evaluate project sites for potential hazards, including lead based paint. Specific work practices to prevent lead contamination as outlined by the Environmental Protection Agency's Lead Certification requirement (40CFR745) as of April 2010 are also included.

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

Applications for funding for proposed developments are reviewed for access to services, including transportation. Projects are considered priority if they are located within a transit oriented corridor. The low-income housing tax credit allocation process give points for projects with access of transportation, this is the process through which WCHC funded new construction is typically financed.

## PROGRAM SPECIFIC REQUIREMENTS

### **CDBG 91.220(I)(1)**

1. Identify program income expected to be received during the program year, including:
  - amount expected to be generated by and deposited to revolving loan funds;
  - total amount expected to be received from each new float-funded activity included in this plan; and
  - amount expected to be received during the current program year from a float-funded activity described in a prior statement or plan.
2. Program income received in the preceding program year that has not been included in a statement or plan.
3. Proceeds from Section 108 loan guarantees that will be used during the year to address the priority needs and specific objectives identified in its strategic plan.
4. Surplus funds from any urban renewal settlement for community development and housing activities.
5. Any grant funds returned to the line of credit for which the planned use has not been included in a prior statement or plan.

6. Income from float-funded activities.
7. Urgent need activities, only if the jurisdiction certifies.
8. Estimated amount of CDBG funds that will be used for activities that benefit persons of low- and moderate income.

**Program Year 3 Action Plan CDBG response:**

1. \$12,000
2. 0
3. Not applicable
4. Not applicable
5. Not applicable
6. Not applicable
7. Not applicable
8. \$805,537, including funds carried over from previous year

**HOME 91.220(I)(1)**

1. Describe other forms of investment. (See Section 92.205)  
If grantee (PJ) plans to use HOME funds for homebuyers, did they state the guidelines of resale or recapture, as required in 92.254.

Although these types of activities are not planned for the upcoming year, homeowner opportunities have been provided primarily through down payment assistance programs. During the period of affordability, HOME funds are recaptured and reallocated to additional HOME eligible projects. In cases of foreclosure, HOME funds are recaptured from net sales proceeds.

2. If grantee (PJ) plans to use HOME funds to refinance existing debt secured by multifamily housing that is being rehabilitated with HOME funds, state its refinancing guidelines required under 24 CFR 92.206(b).

The Washoe County HOME Consortium does not anticipate using funds for the refinancing of properties during the program year but has developed the following refinancing guidelines when reviewing projects requesting funding under this eligible activity throughout its designated service area. These guidelines are developed in accordance with 24 CFR 92.206(b)(2). For multifamily housing projects (projects consisting of five or more units):

- Rehabilitation must be the primary purpose of the request for refinancing. Therefore projects must include per unit rehabilitation costs that meet or exceed the minimum of \$1,000/unit for rehabilitation investment in Consortium and non-Consortium assisted units;

- The developer must demonstrate through proformas, project budgets, and other financial documents that the refinancing is necessary to permit or continue affordability under 24 CFR 92.252;
  - The developer must demonstrate through a minimum 15-year proforma and project budget that as a result of the refinancing the project is sustainable and the targeted population can be served over an extended period of time;
  - The developer must keep the units at the project affordable for a minimum of 15 years, although the Consortium may impose a longer affordability period. Specific occupancy and rent limitations will be set on a case-by-case basis during project review;
  - Staff will conduct a site tour and/or review current photos of the property and units to determine that significant disinvestment has not occurred at the property; and
  - HOME funds cannot be used to refinance multifamily loans made or insured by any federal program, including CDBG.
3. Resale Provisions -- For homeownership activities, describe its resale or recapture guidelines that ensure the affordability of units acquired with HOME funds? See 24 CFR 92.254(a)(4).

Although these types of activities are not planned for the upcoming year, homeowner opportunities have been provided primarily through down payment assistance programs. During the period of affordability, HOME funds are recaptured and reallocated to additional HOME eligible projects. In cases of foreclosure, HOME funds are recaptured from net sales proceeds.

4. HOME Tenant-Based Rental Assistance -- Describe the local market conditions that led to the use of HOME funds for tenant based rental assistance program.

If the tenant based rental assistance program is targeted to or provides a preference for a special needs group, that group must be identified in the Consolidated Plan as having an unmet need and show the preference is needed to narrow the gap in benefits and services received by this population.

HOME guidelines permit for participating jurisdictions to establish local preferences for special-needs groups within its broad, community-wide programs. For the purposes of the WCHC program, homeless persons have been targeted as a special needs group. This need has been identified in the 2010-2014 Consolidated Plan as an unmet need, and the preference is needed to fill the gap in benefits and services available to such persons. According to the National Alliance to End Homelessness there are 643,067 people experiencing homelessness on any given night in the United States. Of that number, 238,110 are people in families, and 404,957 are individuals. Homelessness is not only a national issue of significance but is also a major social issue in Washoe County. Each year the Reno Area Alliance for the Homeless (RAAH) conducts a count of the number of people experiencing homelessness on a given night during the last week of January. In 2011, the count found 601 individuals living in an emergency shelter or in a place not meant for habitation (outdoors, vehicle, etc.). According to the yearly Housing Inventory

Chart, a RAAH document submitted to the U.S. Department of Housing and Urban Development (HUD), the unmet need in 2011 for housing was 132 beds of transitional housing and 632 beds of permanent supportive housing for individuals and families experiencing homelessness.

The mean rental rates for “affordable” apartments as identified by the Nevada Housing Division (Appendix 3) are still unaffordable to most individuals and families experiencing homelessness. For instance, the mean rate for an “affordable” one bedroom apartment in the Reno-Sparks area is \$571.17 per month. In order for an individual to rent an apartment at this rate and not pay more than 30% of their income towards rent, this individual will need to make approximately \$22,847 per year. This equals about \$10.98 per hour. In the economy we currently live in, it is very difficult for someone experiencing homelessness to 1) obtain a full time job; and 2) get paid more than minimum wage (\$8.25).

Last year our local adult shelters served roughly 418 (28%) individuals who self disclosed one or more disabilities (Appendix 4). If one is disabled and lucky enough to receive Supplemental Security Income (SSI), they are paid \$674 per month. To rent the “affordable” apartment above, one would pay about 85% of their income towards rent. These numbers are even worse for market rate apartments. Based on the 2010 U.S. Census American Community Survey, 53.1% of Nevada renters pay more than 30% of their income towards rent (Appendix 5).

5. If a participating jurisdiction intends to use forms of investment other than those described in 24 CFR 92.205(b), describe these forms of investment.

Forms of investment not described in 92.205(b) are not planned.

6. Describe the policy and procedures it will follow to affirmatively market housing containing five or more HOME-assisted units.

The WCHC in its Standard Operating Procedures has set out an affirmative marketing plan as follows:

### **WASHOE COUNTY HOME CONSORTIUM AFFIRMATIVE FAIR HOUSING MARKETING PLAN**

#### **STATEMENT OF POLICY**

The Washoe County HOME Consortium (WCHC), consisting of the City of Reno, the City of Sparks, and Washoe County, in accordance with the regulations of the HOME Investment Partnership (HOME) Program (24 CFR 92.3510, has established this “Affirmative Fair Housing Marketing Plan” to ensure that the consortium and all entities to whom they have allocated HOME or Low Income Housing Trust Funds employ a marketing plan that promotes fair housing and ensures outreach to all potentially eligible households, especially those least likely to apply for assistance.

The Consortium’s policy is to provide information and attract eligible persons to available housing without regard to race, color, national origin, sex, religion, familial status (persons with children under 18 years of age, including pregnant women), or disability. The procedures followed are intended to further the objectives

of Title VIII of the Civil Rights Act of 1968 (Fair Housing Act), and Executive Order 11063, which prohibits discrimination in the sale, leasing, rent and other disposition of properties and facilities owned or operated by the federal government or provided with federal funds.

## PROCEDURES

Although the HOME Final Rule regarding the development and adoption of affirmative marketing procedures and requirements apply to rental and homebuyer projects containing five or more HOME-assisted units, regardless of the specific activity the funds finance (e.g., acquisition, rehabilitation, and/or new construction), the WCHC will apply their affirmative marketing procedures to all programs funded by the WCHC, such as tenant-based rental assistance, owner-occupied rehab, and down payment assistance only programs.

The WCHC is committed to the goals of affirmative marketing that will be implemented through the following procedures:

- A. Providing equal service without regard to race, color, religion, sex, handicap, familial status, or national origin of any client, customer, or resident of any community;
- B. Keeping informed about fair housing laws and practices;
- C. Informing clients and customers about their rights and responsibilities under the fair housing laws by providing verbal and written information;
- D. Evaluating the effectiveness and compliance of all marketing as it relates to fair housing;
- E. Including the *Equal Opportunity* logo or slogan, and where applicable the accessibility logotype, in all ads, brochures, and written communications to owners and potential tenants;



- F. Displaying the HUD's fair housing posters (at a minimum, English and Spanish versions) in rental offices or other appropriate locations;
- G. Soliciting applications for vacant units from persons in the housing market who are least likely to apply for assistance without the benefit of special out-reach efforts; working with the local public housing authority and other service and housing agencies to distribute information to a wide and diversified population;

- H. Maintaining documentation of all marketing efforts (such as copies of newspaper ads, memos of phone calls, copies of letters).
- I. Maintaining a record of applicants for vacant units with a general profile of the applicant, how the applicant learned of the vacancy, the outcome of the application, and if rejected, why; maintaining this record for two years or through one compliance audit, whichever is the shorter period of time.
- J. Where changing demographics present challenges when marketing to an eligible population that is limited English proficient (LEP), WCHC and its funded entities, striving to:
  - 1. Translate its marketing material to serve this population
  - 2. Hire bi-lingual employees or have quick access to interpreters/translators
  - 3. Work with the language minority-owned print media, radio and television stations
  - 4. Partner with faith-based and community organizations that serve newly arrived immigrants, and
  - 5. Conduct marketing activities at adult-education training centers or during "English as a Second Language" classes.
- K. Requiring all applicants for WCHC funds to sign, submit, and adhere to the policies included in the certifications relating to fair housing required in applications packets, including but not limited to attachments A, B, and C of this policy.

**ASSESSMENT:** In conjunction with the annual on-site compliance reviews, the WCHC will:

- A. Review and evaluate records of affirmative marketing effort (advertisements, flyers, and electronic media spots, etc.);
- B. Evaluate outcomes and effectiveness of marketing efforts and make changes where needed.
- C. Evaluate whether good faith efforts have attracted a diversified cross-section of the eligible population.

**CORRECTIVE ACTIONS:** Failure to meet affirmative marketing requirements will result in the following corrective actions:

- A. **For failure to comply,** WCHC will set a probationary period for compliance, not to exceed six months, during which time the WCHC will provide more specific guidelines for compliance.
- B. **Further failure** to comply with the affirmative marketing requirements may result in the withdrawal of HOME and/or LIHTF support.
- C. **Further failure** to take appropriate actions to correct discrepancies in affirmative marketing programs may result in steps to recover all invested HOME or LIHTF funds

Awareness by property managers of the need to do marketing has become even more important as properties face vacancies due to the availability of rental houses in the area. Further, rents for affordable units are very close to fair market rents causing competition for the affordable complexes with market rate complexes.



7. Describe actions taken to establish and oversee a minority outreach program within its jurisdiction to ensure inclusion, to the maximum extent possible, of minority and women, and entities owned by minorities and women, including without limitation, real estate firms, construction firms, appraisal firms, management firms, financial institutions, investment banking firms, underwriters, accountants, and providers of legal services, in all contracts, entered into by the participating jurisdiction with such persons or entities, public and private, in order to facilitate the activities of the participating jurisdiction to provide affordable housing under the HOME program or any other Federal housing law applicable to such jurisdiction.

The City advertises widely when undertaking activities and attempts to identify minority and women businesses to engage in affordable housing initiatives. However, the WCHC is not directly involved in contracting related to projects and as a result requires all recipients to certify that they will:

*...utilize their best efforts to carry out this federal requirement in the award of contracts and subcontracts to the fullest extent consistent with the efficient performance of contracts. As used in this contract, the term "minority or women's business enterprise" means a business, at least 50 percent of which is owned by minority group members or women or, in the case of publicly owned business, at least 51 percent of the stock is owned by minority group members or women. For the purpose of this definition, minority group members are Black, Hispanics, Asians, Native Americans, Alaskans or Pacific Islanders and the businesses have been certified as Minority/Women's Business Enterprise by the Nevada Department of Transportation, Airport Authority of Washoe County and/or the Sierra Pacific Power Company Logistics and Women/Minority Business Development Department...*

8. If a jurisdiction intends to use HOME funds to refinance existing debt secured by multifamily housing that is rehabilitated with HOME funds, state its financing guidelines required under 24 CFR 92.206(b).

Please see the response to item 2 above.

#### **HOPWA 91.220(I)(3)**

1. One year goals for the number of households to be provided housing through the use of HOPWA activities for: short-term rent, mortgage, and utility assistance to prevent homelessness of the individual or family, tenant-based rental assistance, units provided in housing facilities that are being developed, leased, or operated.

NOT APPLICABLE.

#### **ESG 91.220(I)(4)**

1. Identify the written standards for providing ESG assistance in accordance with 24 CFR 576.400(e)(1) and (e)(3).

The City Sparks is not a recipient of ESG funds.

- 2 If the Continuum of Care for the jurisdiction's area has established a centralized or coordinated assessment system that meets HUD requirements, describe the centralized or coordinated assessment system and the requirements for using the system, including the exception for victim service providers, as set forth under 24 CFR 576.400(d)

The local Continuum of Care (CoC) has not yet implemented a centralized or coordinated intake system. Sparks staff participates in the CoC on a regular basis and in discussions regarding the development of a centralized intake.

- 3 Identify the process for making awards and how the jurisdiction intends to make its allocation available to nonprofit organizations, and in the case of urban counties, funding to participating units of local government.

The City Sparks is not a recipient of ESG funds.

- 4 If the jurisdiction is unable to meet the homeless participation requirement in 24 CFR 576.405(a), specify the plan for reaching out to and consulting with homeless or formerly homeless individuals in considering and making policies and decisions regarding any facilities or services that receive funding under ESG.

The City Sparks is not a recipient of ESG funds.

- 5 Describe the performance standards for evaluating ESG activities.

The City Sparks is not a recipient of ESG funds.

- 6 Describe the consultation with each Continuum of Care that serves the jurisdiction in determining how to allocate ESG funds, develop performance standards, evaluate outcomes of activities assisted by ESG funds, and develop funding policies, and procedures for the administration and operation HMIS.

The City Sparks is not a recipient of ESG funds.

## OTHER NARRATIVES AND ATTACHMENTS

Include any action plan information that was not covered by a narrative in any other section. If optional tables are not used, provide comparable information that is required by consolidated plan regulations.

**Limited English Proficiency (LEP).** The Washoe County HOME Consortium, through its HOME funded activities, and the City of Sparks, through its Community Development Block Grant (CDBG) funded programs, seeks to encourage the participation of eligible individuals and households with LEP. An LEP individual or household is defined as "persons who do not speak English as their primary language and who have limited ability to read, write, speak, or understand English ..."

The participating jurisdiction and its partners continue the work to extend oral and/or written translation services to LEP clients to ensure they have access to, and

participation in, programs; translation of documents and interpreter services may be limited to those that are critical to participation in programs.

Oral and written translation services may include the use of:

1. Telephone interpreters on an as-needed basis
2. Bilingual staff
3. Community volunteers
4. Family members or personal friends where appropriate

The amount and depth of LEP services available may be limited based upon the reasonableness and cost of providing these services. "Reasonableness and cost" will be based upon the number and proportion of LEP clients of a certain language background participating in a program on a regular basis and/or not participating in a program because of a language barrier.

If it is determined that a small number and proportion of LEP clients of a certain language background participate infrequently in specific programs, then LEP services will be made available to these participants on an as-needed basis.

Additionally, the participating jurisdiction will disseminate updated contact information to any subrecipients, sub-grantees, and housing providers on local interpretation consultants, other interpretation services, and HUD documents available in languages other than English.

The City of Reno, as the lead entity for the WCHC, previously identified an LEP need in the community – that of the Hispanic population. As an on-going collection of data, the WCHC included the "primary language spoken in the family" as part of the Client Submission Form used for yearly monitorings. This provides a good picture of the language needs at individual properties. The information is gathered in the same manner as race and ethnicity. Based on the current client submission forms obtained during monitoring in FY10/11 from each property, the language most frequently spoken in households, other than English, continues to be Spanish.

For the City of Sparks, bilingual (English-Spanish) staff is available to provide assistance and for phone calls, public meetings, and front desk assistance.

### **SECTION 3**

It is the policy of the City of Sparks and the Washoe County HOME Consortium to require their contractors to provide equal employment opportunity to all employees and applicants for employment without regard to race, color, religion, sex, national origin, disability, veteran's or marital status, or economic status and to take affirmative action to ensure that both job applicants and existing employees are given fair and equal treatment.

The City of Reno, as the WCHC lead agency, implements this policy through the awarding of contracts to developers, CHDOs, non-profit agencies, contractors, vendors, and suppliers, etc., to create employment and business opportunities for qualified low- and very low-income persons residing in the City of Reno, City of Sparks, and Washoe County.

The WCHC will be further concentrating efforts to update and revise its Section 3 policies and procedures, working with developers and contractors for training and compliance. The WCHC has provided funding for CHDO travel specifically for Section 3 training. The WCHC Section 3 policy is being designed to result in a reasonable level of success in the recruitment, employment, and utilization of WCHC area residents and other eligible persons and businesses by general contractors working on contracts partially or wholly funded with the United States Department of Housing and Urban Development (HUD) monies. The WCHC shall examine and consider a developer's, CHDO's, or contractor's potential for success by providing employment and business opportunities to public housing and low to very low income residents *prior* to acting on any proposed contract award. All applicants for funding are required to sign the *Section 3 Clause for Certifications and Assurances for the Affordable Housing Municipal Loan Program Funding Recipients* and to include the following Section 3 Clause in all contracts:

A. The work to be performed under this contract is on a project assisted under a program providing direct Federal financial assistance from the Department of Housing and Urban Development and is subject to the requirements of 24 CFR 92 - HOME Investment Partnership Program § 92.350 and § 92.508 referencing Section 3 of the Housing and Urban Development Act of 1968, as amended, 12 U.S.C. 1701u. Section 3 requires that to the greatest extent feasible, opportunities for training and employment be given to lower income residents of the area of the Section 3 covered project, and contracts for work in connection with the project be awarded to business concerns which are located in, or owned in substantial part by persons residing in the area of the Section 3 covered project.

B. The parties to this contract will comply with the provisions of said Section 3 and the regulations issued pursuant thereto by the Secretary of Housing and Urban Development set forth in 24 CFR 135, and all applicable rules and orders of the Department issued there under prior to the execution of this contract. The parties to this contract certify and agree that they are under no contractual or other disability which would prevent them from complying with these requirements.

C. The contractor will send to each labor organization or representative of workers with which he has a collective bargaining agreement or other contract or understanding, if any, a notice advising the said labor organization or worker's representative of his commitments under this Section 3 clause and shall post copies of the notice in conspicuous places available to employees and applicants for employment or training.

D. The contractor will include this Section 3 clause in every subcontract for work in connection with the project and will, at the direction of the applicant for or recipient of Federal Financial assistance, take appropriate action pursuant to the subcontract upon a finding that the subcontractor is in violation of regulations issued by the Secretary of Housing and Urban Development, 24 CFR part 135. The contractor will not subcontract with any subcontractor where it has notice or knowledge that the latter has been found in violation of regulations under 24 CFR part 135 and will not let any subcontract unless the subcontractor has first provided it with a preliminary statement of ability to comply with the requirements of these regulations.

E. Compliance with the provisions of Section 3, the regulations set forth in 24 CFR Part 135, and all applicable rules and orders of the Department issued there under prior to the execution of the contract, shall be a condition of the Federal financial assistance provided to the project, binding upon the applicant or recipient, its contractor and subcontractors, its successors, and assigns to those actions specified by the grant or loan agreement or contract through which Federal assistance is provided, and to such sanctions as are specified by 24 CFR Part 135.

## **FAIR HOUSING**

Cognizant of the important role Fair Housing plays in all housing, the City of Sparks and the WCHC continue to fund and work with Silver State Fair Housing (SSFH), a private, non-profit agency advocating for equal access to housing in Nevada since 1989. SSFHC advocates for fair housing by providing a comprehensive program of outreach, education, and enforcement activities. By addressing the needs of housing consumers, housing providers, and local governments, SSFHC works to break down barriers to equal housing opportunity and build opportunities for community members to relate to each other as neighbors.

## **ACCESSIBILITY**

A project under the HOME program means "a site or sites together with any building (including manufactured housing units) or buildings located on the site(s) under common ownership, management and financing, to be assisted with HOME funds as a single undertaking and includes all activities associated with the site and building." Any project assisted under the HOME Program is required to follow and is subject to HUD accessibility requirements from three Federal statutes:

The Rehabilitation Act (1973) Section 504: Applies to new construction multi-family rentals of 5 or more units and substantial rehab (greater than 75% of replacement cost, which is the value of the rehab after completion) of 15 or more units, requiring 5 % of the total number of the project's *units* to be for physically impaired (a unit that is on an accessible route and is adaptable and otherwise in compliance with the standards set forth in Sec. 8.32 is accessible for purposes of this section), *PLUS* an *additional* 2% of the total number of the project's *units* to be for sensory impaired (Please note that HUD has advised that using kits marketed to adapt the unit for sensory impaired persons may not fully meet this unit requirement). For example, a complex with 40 units would need 2 units for physically impaired plus an additional one unit for sensory impaired, or 3 total units. Other situations must be addressed "to the maximum extent feasible."

- The act also requires that the program be made accessible (that is, with office accessibility, intake procedures, applications, etc.) and promoted affirmatively.
- It further requires that all units be made "visitable" by persons with disabilities to the furthest extent feasible.
- Employers must make employment accessible and recipients or subrecipients having 15 or more employees must designate a Section 504 Coordinator and notify program participants and employees of non-discrimination policies, as well as conduct self-evaluations of compliance with Section 504.

- **Fair Housing Amendments Act (1988):** Prohibits discrimination based on disability and imposes general accessibility standards for newly constructed

projects of 4 or more rental units. The standards cover public and common use areas, passageways, and ground floor and elevator accessible units. It requires reasonable accommodations for occupants to do reasonable modifications.

- **Americans with Disabilities Act (1998):** Extended the requirements to State and local programs that persons with disabilities have equal opportunity to benefit.

DRAFT