



# Forth Program Year CAPER

The CPMP Consolidated Annual Performance and Evaluation Report includes Narrative Responses to CAPER questions that CDBG, HOME, HOPWA, and ESG grantees must respond to each year in order to be compliant with the Consolidated Planning Regulations. The Executive Summary narratives are optional.

The grantee must submit an updated Financial Summary Report (PR26).

## GENERAL

### Executive Summary

This CAPER is the required annual report on the activities and expenditure of funds for the City of Sparks and the Washoe County HOME Consortium (WCHC), in which the City of Sparks is a participating jurisdiction. The City receives a direct allocation of Community Development Block Grant (CDBG) funds and the WCHC receives Home Investment Partnership (HOME) and other funding. The City of Reno serves as the lead agency for the WCHC and administers the HOME and other funding received by the WCHC. Funding is allocated in a manner consistent with the needs of the community as identified in the Consolidated Plan. In addition, efforts are made to improve the leveraging of funds through the coordination of funded activities with other City activities and plans.

The City of Sparks has prioritized projects that meet the immediate needs of low-and moderate-income individuals and neighborhoods, including public services, infrastructure and facilities. The City's PY 2013-14 Annual Action Plan identifies a target area for the City's Pedestrian Improvements activity as bounded 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. This project area was selected based on its location in a low-income area, meeting the LMI area benefit under the suitable living environment objective and availability/accessibility outcome.

The WCHC provided funding to a range of housing which met the needs of families at different income levels. Funding for rental projects is targeted for very low and extremely low households. Homebuyer assistance was through both HOME and a Neighborhood Stabilization Program grant from the Nevada Housing Division. In addition, the City of Sparks facilitated homebuyer assistance by allocating its private activity bond capacity to the State of Nevada's Housing Division for their first-time homebuyer programs and down payment assistance program.

### General Questions

1. Assessment of the one-year goals and objectives:
  - a. Describe the accomplishments in attaining the goals and objectives for the reporting period.
  - b. Provide a breakdown of the CPD formula grant funds spent on grant activities for each goal and objective.
  - c. If applicable, explain why progress was not made towards meeting the goals and objectives.

2. Describe the manner in which the recipient would change its program as a result of its experiences.
3. Affirmatively Furthering Fair Housing:
  - a. Provide a summary of impediments to fair housing choice.
  - b. Identify actions taken to overcome effects of impediments identified.
4. Describe Other Actions in Strategic Plan or Action Plan taken to address obstacles to meeting underserved needs.
5. Leveraging Resources
  - a. Identify progress in obtaining "other" public and private resources to address needs.
  - b. How Federal resources from HUD leveraged other public and private resources.
  - c. How matching requirements were satisfied.

### **Forth Program Year CAPER General Questions Response**

#### **1. Assessment of the one-year goals and objectives**

The City of Sparks is a Community Development Block Grant (CDBG) entitlement community. It received \$545,181 in new grant funds for Program Year (PY) 2013. Additionally, the City reallocated funds from previous program years totaling \$502,138. Combined, these total \$1,047,319 with which the City of Sparks used as follows:

Planning and Administrative:	
Program Administration	\$126,473
Silver State Fair Housing	
Continuum of Care	
Public Services: to support/supplement operation of the CAC (homeless shelters)	\$81,777
Housing Rehabilitation:	\$145,000
Public Facilities (Improvements to shelter facilities for the homeless) (Reallocated funds from previous year)	\$188,000
Activities meeting a national objective not included under the above subheadings:	
Public Facilities (LMI/Area Benefit)	
Pedestrian Improvement	\$506,069

In PY 2013, each of the City's high priority goals were addressed and at least partially met or initiated. The City continued to prioritize its Single Family Homeowner Housing Rehabilitation and Public Services activities. In addition, a public facility improvement project (Pedestrian Improvements) was planned and completed. No funding was allocated or expensed on activities that did not meet a national objective as prescribed by HUD.

The City's priorities and the accomplishments or status of the project are as follows:

**Priority Need - Public Services:**

The City of Sparks committed the maximum of 15%, or \$81,777, of its PY 2013 CDBG allocation to fund the provision of services for the homeless at the Community Assistance Center located in Reno. The CAC includes shelters for men, women and families as well as a resource center. Total annual funding for the CAC provided by Reno, Sparks and Washoe County is approximately \$1.5 million.

As part of the City's Planning and Administrative activities, Sparks continued to collaborate and consult for Fair Housing Activities and for the facilitation of the Continuum of Care process.

**Priority Need – Housing Rehabilitation:**

In FY 2013-14, the City of Sparks allocated \$145,000 for its Single Family, Owner-Occupied Housing Rehabilitation Deferred Loan and Emergency Repair Grant Programs. Additionally, a total of \$126,473 was expended during PY 2013 for Planning and Administrative activities including; Housing Rehabilitation Administration, Fair Housing initiatives and Continuum of Care. Housing Administration provided a total of sixteen loans in the Sparks community (six - Single Family Owner-Occupied Housing Rehabilitation loans and ten - Emergency Repair Grants). The local housing market was in the initial stages of recovery in PY 2013 however values remain substantially below the "peak values" at which many homes were purchased or refinanced. Despite recent price gains, *CoreLogic* states that Nevada still leads the nation in the percentage of mortgaged homes that have negative equity at 36.4 % (the national figure is 14.5%). This has made it difficult for many households interested in the City's loan program to qualify as they lack sufficient equity in their homes to meet the program's loan-to-value standard, in which the City has raised to avert any stressed loans conditions amongst its clientele.

There has been, however, more interest in the City's Emergency Grants. The maximum amount allowable under this program is \$2,500 per household. The applicant must meet the income requirement of 60% or less of area median income. These grants may only be accessed in the event of an emergency that can affect health and safety.

**Priority Need – Physical Improvements, Pedestrian Improvements:**

Is bounded 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. This project area was selected based on its location in a low-income area, meeting the LMI area benefit under the suitable living environment objective and availability/accessibility outcome.

The City of Sparks allocated CDBG funds in the amount of \$373,195 for FY 2012 plus an additional \$49,097 of reprogrammed funds toward pedestrian improvements. Of this amount, \$338,908 was expended during PY 2012. The project undertaken during PY 2012 was a continuation of efforts on 5<sup>th</sup> Street between Wright Street and Victorian Avenue and on the directly adjacent side street blocks to the east and west. The work performed under this activity primarily consisted of removing and replacing concrete curb, gutter and sidewalks, installing accessibility ramps, driveway approaches, and street repairs as necessary. The project has largely been completed with the balance of the funds being held for some installation of heat-sensitive landscaping (i.e., trees) during cooler weather this Fall.

**Priority need – Public Facility Improvements**

The City's Annual Action Plan for Program Year 2013 added a new activity; to utilize up to \$188,000 in unspent funds from a previous year to fund improvements at the Community Assistance Center (i.e., the homeless shelter facility) located on Record Street in Reno. The new improvements included: a new electric gate and fencing; new lighting and cameras;

and new freeze/thaw resistant drinking fountains in the day use area. The security gate and cameras provided protection of the CAC facility and its clientele. The cameras and replacing the current rear manual gate with an electronic gate enabled the CAC operator to significantly enhance security without additional security personnel, the cost of which diverted resources from the CAC's other operational needs.

The City of Sparks was in the process of working with the City of Reno on this project. The City of Sparks completed the project in FY 2013-14.

**2. Describe the manner in which the recipient would change its program as a result of its experiences**

CDBG – City staff continues to closely monitor the expenditure of funds for housing rehabilitation and public infrastructure projects. This includes setting goals for the expenditure of funds and the inclusion of CDBG funded public infrastructure projects in the City's Capital Improvements (CIP) program. The City is also striving to initiate projects earlier in the program year so as to assure the timely expenditure of funds.

HOME—The Washoe County HOME Consortium (WCHC) continues to revise standard operating procedures to improve its program administration. Changes to roles and responsibilities for the Technical Review Committee (TRC) of the WCHC were approved by the Directors and the participating jurisdictions in 2011 as part of the renewal of the HOME consortium agreement. These changes have now been incorporated into the most recent WCHC Intergovernmental Agreement and are being processed as amendments to the TRC By-Laws. The TRC, along with its previous responsibilities to evaluate, prioritize, and recommend projects for funding, will also serve as the entity to receive community and stakeholder input, to monitor progress of adopted housing plans throughout Washoe County, to address concerns and suggestions regarding housing issues and to recommend regional housing goals.

As the lead entity, Reno City staff has considered changing other areas of how the program functions such as the loan servicing component, underwriting criteria, and financing types. Over the past year, the Directors approved the implementation of energy efficiency standards for all WCHC funded rental projects. It is expected that these areas in addition to other program components will be revised additionally when the new HOME rule is published.

**3. Affirmatively Furthering Fair Housing**

In Program Year 2008, the City of Sparks partnered with the City of Reno and Washoe County to develop The Analysis of Impediments to Fair Housing Choice (AI). The AI identified several areas of impediments to fair housing choice. Among these were a lack of public awareness of fair housing and fair housing services, fair housing service delivery system not as effective as desired, fairly high home mortgage loan denial rates existing for selected minorities, discrimination in the rental markets, and discriminatory terms and conditions in rental leases.

To address the identified impediments, the local jurisdictions (Reno, Sparks, and Washoe County) and the Washoe County HOME Consortium (WCHC) are actively engaged in affirmatively furthering fair housing. During FY 2013-14, \$15,000 was provided to the Silver State Fair Housing Council (SSFHC) to undertake fair housing activities. SSFHC's work program is coordinated with the 2008 AI Action Plan, which they were also involved in developing. Their program features a combination of education, counseling, and investigation activities:

- Education activities (e.g., training sessions on accessibility guidelines, seminars, public awareness campaigns) are designed to increase community awareness of fair housing rights and responsibilities.
- SSFHC also uses testers, funded by other resources, to evaluate on-site discrimination.
- Counseling and investigative activities are intended to enhance compliance with fair housing law by demonstrating the community's willingness to enforce the law (e.g. through the filing of housing discrimination claims with HUD).
- Local jurisdictions monitor SSFHC's activities, participate in education efforts and provide support (e.g. building permit and other data) for both educational and investigative activities.

In addition, the WCHC requires all Affordable Housing Municipal Loan Program applicants for funding to submit a Fair Housing Certification and Assurances form, provided in the application, to make them aware of Fair Housing requirements and to certify that the Applicant, Principal Officers, and the property(ies) with which the Applicant is, or has been associated with, do not have unsatisfactorily resolved fair housing complaints filed with the Housing and Urban Development (HUD) or any court of any jurisdiction. They are required to indicate the resolution of any complaints. Applicants are further required to certify that they will adhere to the WCHC Affirmative Fair Housing Marketing Plan that is included in the application. The WCHC staff monitors properties including compliance with the marketing plan, ensuring that Fair Housing posters are visible in rental offices, that documents include the fair housing wording regarding discrimination, that equal opportunity and the accessibility logotypes are used in advertising, and that they are maintaining waiting and denial lists, etc., in compliance with fair housing law.

It is the policy of the Washoe County HOME Consortium (WCHC) to require its 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, sexual orientation, or economic status and to take affirmative action to ensure that both job applicants and existing employees are given fair and equal treatment.

Application materials and/or bid documents for both HOME and CDBG require that full consideration be given to minority and women owned businesses. The City of Reno affirms its interest in and encourages the different contracting communities to actively pursue participation and utilization of Minority and Women Business Enterprises on City project. In addition, all grant agreements and contracts state to the greatest extent feasible entities make contract opportunities known and available to women and minority businesses. Each contract is then required to complete and submit information regarding the participation of M/WBE per HUD form 4107 which is submitted to HUD with the CAPER.

The WCHC requires that all Section 3 covered contracts include the Section 3 Clause, which states that all work to be performed under the contract requires, to the greatest extent feasible, opportunities for training and employment be given to lower income residents of the area of the Section 3 project and contracts for work in connection with the project be awarded to business concerns located in or owned in substantial part by persons residing in the area of the Section 3 project.

#### **4. Describe other actions in Action Plan taken to address obstacles to meeting underserved needs.**

The limited public and private resources available make it very difficult to meet the needs of those most in need. Staff continues to participate in a range of activities to improve efficiencies and stretch resources in an effort to overcome the obstacles to meeting the needs of underserved families, especially those who are homeless or at-risk of homelessness and those changing their housing tenure. The jurisdiction has continued to partner with other entities to meet resident needs from homebuyers to the homeless individuals. Over the past year staff has:

- Worked with Reno Housing Authority and Financial Guidance Center (formerly Consumer Credit Counseling Affiliates) to ensure homebuyers are provided pre- and post-homebuyer counseling and education.
- Participated in the Statewide Foreclosure Task Force.
- Participated in housing workshops to assist homeless households apply for appropriate affordable housing opportunities;
- Developed plans for the NSP 3 grant to address the housing needs of the lowest income households.
- Implemented service enriched programming at the homeless shelters.
- Participated in the Reno Area Alliance for the Homeless (RAAH).

#### **5. Leveraging resources**

*Other Resources* – Federal funding to the City of Sparks and WCHC leverages significant other resources for human services and affordable housing, including:

##### State Emergency Shelter Grant (ESG)

Annually, the City of Reno submits a request for funding to the State of Nevada identifying required programs needed to serve the homeless in the region. The City ensures that the request is in conformance with the Consolidated Plan, the Annual Plan, and the Continuum of Care Strategy for the Homeless.

##### Emergency Food and Shelter Grant Program (EFSP)

The City of Reno received an EFSP grant of \$59,905 from the Local Board to support operations of the men's, women's and family shelters.

##### Room Tax Monies

The City of Reno committed \$47,500 in room tax monies for affordable child care programming. As a result, the Children's Cabinet, a collaboration of several different agencies which provided respite care to low income families, and Catholic Community Services – Holy Child Day Home which provided sliding fee scale child care to low income parents, were funded.

##### Washoe County General Funds

The County provided \$1.13 million in general funds for the operation of the Community Assistance Center.

##### Sparks General Funds

The City of Sparks provided \$95,000 from its General Fund to fund Washoe County Human Services Consortium grantees.

Low Income Housing Trust Fund (LIHTF)

The WCHC expended \$417,176 in available Low Income Housing Trust funds to support affordable housing for families at or below 60% AMI.

*Match*

Affordable Housing Municipal Loan Program (AHMLP), Washoe County HOME Consortium (WCHC)

During this reporting period, HOME funds expended by the WCHC for completed rental projects leveraged approximately \$18,635,039 in private and state resources. In addition, as provided for in the Nevada Revised Statutes, projects funded through HOME are eligible for a property tax-exemption; this is significant because it allows the developer to secure additional private funds due to the increase in available cash flow. This year Silver Sage Senior and River Senior Apartments became eligible for tax exemptions worth approximately \$3,482,832 over the affordability periods.

HOME—The WCHC was required to provide a 25 percent match for \$407,070.62 for \$1,631,882.49 in drawn HOME funds during PY 2013. A total of \$3,849,994 was provided as match. The WCHC's match is generated through an annual deferral of property taxes on HOME funded projects and the contribution of LIHTF to HOME funded or HOME eligible projects.

ESG—The match requirement for ESG funds was met through the contribution of the 3 local jurisdictions who partner to fund the Community Assistance Center operations, including the men's, women's and family shelters operated by Volunteers of America through a contract with the City of Reno as the lead entity funder of a Cooperative Agreement with Washoe County and the City of Sparks. Approximately \$1.23 million in non-federal funding was used to support the shelter operations and serve as match for ESG.

## Managing the Process

1. Describe actions taken during the last year to ensure compliance with program and comprehensive planning requirements.

Forth Program Year CAPER Managing the Process response:

The City of Sparks Community Services and Finance Departments are the primary departments responsible for implementing the Sparks Consolidated Plan and coordinating with other departments and public and private agencies that are subrecipients of funds. The City Planner, Housing Specialist and a Senior Administrative Analyst in the Finance Department oversee program compliance for all Human Services grants, procurement compliance on all requests for proposals and contract agreements, labor compliance on public works projects and prepare and submit all required reports. Engineering staff in the Community Services Department provide on-site construction supervision to ensure that identified public infrastructure projects are completed.

**Washoe County Human Services Consortium (public services)** — In PY 2012, funding was allocated to agencies that had been awarded funding through the Consortium process in PY 2011. The Consortium was a collaboration between the City of Reno, City of Sparks and Washoe County but has been discontinued due to the need to fund regional homeless services through an inter-local agreement between the three (3) entities, on-going

reductions in available non-federal funds, and the need to focus on activities supporting HEARTH Act goals.

**Washoe County HOME Consortium (housing)** — The WCHC is also composed of the three jurisdictions: Reno, Sparks, and Washoe County. The Consortium Directors are the managers of the three jurisdictions, with Reno as the Lead Agency. The WCHC has a Technical Review Committee (TRC) composed of a staff representative and one community representative from each jurisdiction, a staff representative from regional planning and one at-large member.

Each year a funding round is held from January to April to allocate funds for the following program year. This process facilitates the timely commitment and expenditure (24 months to commit/five years to disburse) of HOME funds as well as allows developers to apply for Low-Income Housing Tax Credits in the same funding year. Between January and March, the TRC receives and evaluates applications, holds three public hearings, and makes funding recommendations that are acted upon in a public meeting by the WCHC Directors during a public meeting in March. The directors forward the approved recommendations to the Truckee Meadows Regional Planning Governing Board (RPGB), which consists of elected officials from each jurisdiction, at its April meeting for ratification during their public meeting.

The WCHC's agreement renewal is accomplished through the "automatic renewal clause," which allows a more streamlined renewal process.

In 2011, the Technical Review Committee of the WCHC worked with the Directors to revise the purpose of the TRC to increase its participation as a forum for citizen input and to provide a process to make recommendations for compliance and comprehensive plan reviews. The purposes of the TRC are:

- a. To provide a forum for the discussion of regional housing issues, the recommendation of funding priorities and policies and procedures;
- b. To make funding recommendations related to all AHMLP funds, including HOME, State Low Income Housing Trust Funds, and other potential sources of affordable housing funding;
- c. To review eligible projects for consistency with the priorities and policies included in the Consolidated Plan, Action Plans, Truckee Meadows Regional Plan, relevant jurisdictions' comprehensive housing plans, and/or specific self-directed priority project(s) and criteria established by the technical staff of WCHC members, including threshold criteria concerning length and depth of affordability which are more strict than those required by regulations or rules outlining the use of the particular funding source;
- d. To evaluate the projects using other criteria developed and adopted by the WCHC;
- e. To prioritize projects based on the evaluation process developed by the Lead Agency in collaboration with technical staff persons from each WCHC member and make AHMLP funding recommendations as constrained by the applicability and availability of funds;
- f. To act as a forum to receive community and stakeholder input, to monitor progress on adopted plans, to address concerns and suggestions regarding housing issues, and to establish regional housing goals;
- g. To coordinate and communicate regional, longer-term housing priorities for funding available to the jurisdictions; and



- h. To make policy recommendations that advance the implementation of the Consolidated Plan, jurisdictional housing elements, and improve the overall provision of affordable and workforce housing in alignment with local goals and priorities.

In order to meet the requirements of acting as a housing forum, the TRC held one meeting at the City of Sparks' offices, and plans to hold one or more public hearings in a non-Reno location in the upcoming year. Staff also conducted outreach to the Neighborhood Advisory Boards to inform them of the WCHC and affordable housing in the community.

WCHC staff continuously works to improve standardized procedures, provide detailed guidance in funding agreements, and provide technical assistance when requested. Funding Request for Proposals (RFP) are reviewed each year prior to the upcoming funding rounds to ensure that regulations are clearly stated and any new regulations or requirements are included in the RFPs.

Training is a valuable tool, and although most HUD trainings are free, travel costs can often be prohibitive for staff, developers, and CHDOS. CHDOS, as non-profits, find it especially hard to fund travel to out-of-state locations and the cost of travel is often noted as the main obstacle to attending classes inside and outside of Nevada. The WCHC continues to encourage trainings to be brought to the Northern Nevada area. The WCHC has assisted CHDOs to attend training and will continue to encourage CHDO trainings.

Staff evaluates program operations and administration for opportunities to improve the efficiency and effectiveness of funding as well as ensure compliance with Federal regulations and addressing the most pressing community needs to maintain existing and develop new affordable housing. With an extremely limited staff and administrative funding, cross-training has become an important tool and will be increased as needs arise.

Staff continues to work with HUD staff to resolve issues that arise and/or to clarify HUD's interpretation of regulatory requirements.

## **Citizen Participation**

1. Provide a summary of citizen comments.
2. In addition, the performance report provided to citizens must identify the Federal funds made available for furthering the objectives of the Consolidated Plan. For each formula grant program, the grantee shall identify the total amount of funds available (including estimated program income), the total amount of funds committed during the reporting period, the total amount expended during the reporting period, and the geographic distribution and location of expenditures. Jurisdictions are encouraged to include maps in describing the geographic distribution and location of investment (including areas of minority concentration). The geographic distribution and expenditure requirement may also be satisfied by specifying the census tracts where expenditures were concentrated.

Forth Program Year CAPER Citizen Participation response:

Pursuant to the Citizen Participation Plan developed by the Cities of Sparks and Reno, and in compliance with 24 CFR 91, a draft of the CAPER was provided for a 15 day public comment period from September 6, 2014 through September 20, 2014. Notification was published in the *Reno Gazette Journal* on September 6, 2014. A public hearing was held before the Sparks City Council on September 22, 2014.

The CDBG allocation for PY 2013 was for \$545,181. Attached is the CDBG Financial Summary for Program Year 2013 which outlines funding and expenditures. The City largely completed one physical improvement activity, Pedestrian Improvements. The project undertaken during PY 2013 was a continuation on 4<sup>th</sup> Street between Prater Way and Victorian Avenue and on the directly adjacent side street blocks to the east and west. The project area is located in Census Tract 30.00, Block Group 6.

## **Institutional Structure**

1. Describe actions taken during the last year to overcome gaps in institutional structures and enhance coordination.

Forth Program Year CAPER Institutional Structure response:

The City of Sparks Community Services and Finance Departments are the primary departments responsible for implementing the Sparks Consolidated Plan and coordinating with other departments and public and private agencies that are subrecipients of funds. The City Planner and Housing Specialist of the Community Services Department and a Senior Administrative Analyst in the Finance Department oversee program compliance for all Human Services grants, procurement compliance on all requests for proposals and contract agreements, labor compliance on public works projects and prepare and submit all required reports. Engineering staff in the Community Services Department provide on-site construction supervision to ensure that identified public infrastructure projects are completed.

The City contracted with non-profit agencies to provide a variety of social services to residents. These agencies are experienced in providing these types of services and managing grants. Staff monitors programs annually and provides technical assistance as necessary.

The WCHC enters funding agreements with private developers and program administrators to address identified housing needs throughout Washoe County. Staff monitors expenditures and development activities throughout construction and monitors completed projects annually throughout the affordability period.

The cities of Sparks and Reno also contract with Silver State Fair Housing for continued compliance with federal Fair Housing laws. As part of this effort Silver State Fair Housing provides staff training on related Fair Housing laws and tracks new housing developments, providing developers with Fair Housing Resources. This partnership enables the jurisdictions to further leverage their funding for increased staff training opportunities and regulatory compliance.

The cities of Sparks, Reno and Washoe County contract with Social Entrepreneurs, Inc. for facilitation of the Reno Area Alliance for the Homeless (RAAH) and development of the annual Continuum of Care application for homelessness prevention funding.

## **Monitoring**

1. Describe how and the frequency with which you monitored your activities.
2. Describe the results of your monitoring including any improvements.

3. Self Evaluation
  - a. Describe the effect programs have in solving neighborhood and community problems.
  - b. Describe progress in meeting priority needs and specific objectives and help make community's vision of the future a reality.
  - c. Describe how you provided decent housing and a suitable living environment and expanded economic opportunity principally for low and moderate-income persons.
  - d. Indicate any activities falling behind schedule.
  - e. Describe how activities and strategies made an impact on identified needs.
  - f. Identify indicators that would best describe the results.
  - g. Identify barriers that had a negative impact on fulfilling the strategies and overall vision.
  - h. Identify whether major goals are on target and discuss reasons for those that are not on target.
  - i. Identify any adjustments or improvements to strategies and activities that might meet your needs more effectively.

Forth Program Year CAPER Monitoring response:

#### Sparks CDBG

The City of Sparks' City Planner and Housing Specialist of the Community Services Department and a Senior Administrative Analyst in the Finance Department have monitoring responsibilities for the City's CDBG funded activities. These staff are responsible for ensuring each CDBG funded project and activity complies with federal regulations such as meeting National Objectives, completing Environmental Assessments, reviewing certified payrolls and conducting field interviews for Davis-Bacon compliance, and related subrecipient grant making and contracting requirements.

#### HOME

WCHC staff monitors all funded projects and programs annually to evaluate compliance with funding regulations. Staff reviews the following items:

- Verification of income for clients housed in funded projects to ensure the developer is serving the appropriate clientele;
- Verification of rents charged to ensure rents are in compliance with HOME rents issued by HUD;
- Units and grounds for compliance with minimum housing quality standards and local building codes;
- Reports and client usage forms;
- Lease agreements for non-allowable clauses;
- Compliance with other Federal regulations;
- Construction progress; and
- Review processes and performance of programs for compliance with funding agreements

Notice of upcoming monitoring visits is provided in advance and follow-up requirements and/or closing letters are provided as soon as possible following the monitoring.

During PY 2013-2014, WCHC staff monitored all funded programs and projects. Concerns were typically addressed in a timely manner. Properties are given 45 days to respond and/or correct any issues noted at the monitoring; staff contacts unresponsive properties after 45 days and issues related to monitoring are reviewed with them and a time frame for responding is established. Staff continues to closely monitor programs and/or projects with

previous monitoring issues. All projects and programs were found to be substantially in compliance with regulations at the initial visit.

Monitoring staff frequently refers managers and developers to HUD published guides, the *HOME Primer*, and the CPD website. Notices of upcoming training opportunities are forwarded to CHDOs and managers as applicable.

Beginning with the Fiscal Year 08-09 WCHC funding round, CHDO certification/recertification applications required that the CHDO provide a plan for self-sufficiency that includes the following detailed information:

- Cumulative revenues and expenditures,
- Organization balance sheets,
- A strategic/written narrative component, and
- Measurable goals related to the mission, such as capacity building.

So long as a CHDO continued to be certified, in regulatory compliance, and followed the Plan, the organization would be eligible for operating funds for four (4) years or through the development of two (2) CHDO set-aside projects, whichever occurs first. CHDOs are required to provide annual updates related to their progress to meeting capacity and "self-sufficiency". A new CHDO begins its four year eligibility for operating funds at its first certification and is required to provide a five year strategic plan in the first certification application

For FY 2013-2014, WCHC recertified one (1) CHDO. Qualified CHDOs must apply and be re-certified each in December of each program year for the upcoming year. The WCHC continues to seek new CHDOs and, when applicable, suggests to developers that they partner with existing CHDOs.

*Compliance in HOME Rental Projects: A Guide for PJs* has proven to be a valuable tool for monitoring purposes. *Compliance in HOME Rental Projects: A Guide for Property Owners* has been frequently recommended to property owners/managers.

## **Lead-based Paint**

1. Describe actions taken during the last year to evaluate and reduce lead-based paint hazards.

Forth Program Year CAPER Lead-based Paint response:

Based upon the 2006-2008 ACS data, approximately 38% of the City of Sparks 35,356 housing units were built pre-1979. Of those units, an estimated 10% were built prior to 1949 when lead based paint was most prevalent. 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 residing in homes constructed 1978 and prior are presented with lead information in compliance with HUD guidance, the information is reviewed with the clients who also sign documentation indicating their receipt of the resource 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.

On April 22, 2008, EPA issued a rule requiring the use of lead-safe work practices aimed at preventing lead poisoning in children. On April 22, 2010, the rule became effective and firms performing renovation, repair and painting projects that disturb lead-based paint in homes, child care facilities, and schools built before 1978 must be certified, individual renovators must be trained by an EPA-accredited training provider, and the firms and renovators must follow specific work practices to prevent lead contamination. To become a certified renovator, individuals are required to take eight hours of training, of which two hours must be hands-on training, to become certified. This training is good for five years. The WCHC continues to encourage contractors to find opportunities to take this training and the WCHC notifies contractors if it is aware of training opportunities.

## HOUSING

### Housing Needs

\*Please also refer to the Housing Needs Table in the Needs.xls workbook.

1. Describe Actions taken during the last year to foster and maintain affordable housing.

Forth Program Year CAPER Housing Needs response:

The Reno-Sparks housing market showed improvement in PY 2013 but housing values remain significantly below what they were at the "peak" of the housing bubble and the region's households continue to suffer foreclosure and loan delinquency. Some areas within the region have seen housing values decline more than 50 percent since the market collapsed four years ago.

The ability of low-moderate income buyers has been affected by the Nevada legislature's passage of a law affecting the banks' ability to process non-judicial foreclosures. When a unit goes through a judicial foreclosure it can take up to a year to be able secure clear title. As a result of these issues, investors are once again becoming the heavy buyers of single-family homes, and they are again purchasing them for more than appraised values. Over the last year prices rose by over 20% and the challenge for low income buyers was the competition for homes from investors and cash buyers, which has made it difficult to enter the homeownership market.

As a result of the overall economy and housing market the rental market has suffered as well. Subsidized projects targeting lower incomes are faring much better than those with rents close to the fair market rents (those targeting incomes greater than 50% of AMI). The WCHC has continued to focus on developments targeting these lower AMIs, including prioritizing households at or below 40% of AMI for all future WCHC funded activities.

Staff continues to work with community groups to address issues impacting housing assistance programs.

In an effort to support home ownership, the City of Sparks offers a Single Family Owner-Occupied Housing Rehabilitation program, which is comprised of two elements at the city level. 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 maximum amount of the loan is \$20,000. The loan is secured by a Deed of Trust on the home and must be paid back upon sale of residence, transfer of title, or when the original applicant(s) no longer resides in the home. There are no monthly payments or interest charges assessed. The loan may be paid off early at any time. Through this program, qualifying households are afforded the means to address needed repairs and maintenance to their home that may not be affordable due to unforeseen financial constraints.

### **Specific Housing Objectives**

1. Evaluate progress in meeting specific objective of providing affordable housing, including the number of extremely low-income, low-income, and moderate-income renter and owner households comparing actual accomplishments with proposed goals during the reporting period.
2. Evaluate progress in providing affordable housing that meets the Section 215 definition of affordable housing for rental and owner households comparing actual accomplishments with proposed goals during the reporting period.
3. Describe efforts to address "worst-case" housing needs and housing needs of persons with disabilities.

Forth Program Year CAPER Specific Housing Objectives response:

**The following is provided due to the City of Sparks' participation in the Washoe County HOME Consortium:**

Following is an overview of the WCHC goals established in the 2011 Annual Action Plan which flows from the Consolidated Plan and a report on progress toward the identified goals. Generally, housing development projects are allocated money during one program year but actually come on line and providing housing opportunities within the next two to five years.

All WCHC assisted housing identified meets the Section 215 definition of affordable housing. All residents of assisted housing must be income qualified and will remain occupied by low to moderate income households throughout the affordability period.

All housing projects of moderate to large size (20 or more units) developed with HOME, matching or program income funds are required to set-aside 20 percent of the WCHC units for households earning at or below 30 percent of AMI. It is believed that this approach best addresses "worst-case" housing needs, because these households are most likely to be extremely low-income and have very limited housing choices that would be either affordable or of acceptable quality. Staff works with developers to identify mechanisms to insure the long-term viability of projects targeting these extremely low income households in larger numbers.

Projects funded with HOME or match funds for FY 2013-2014 was:

<u>Development Projects:</u>	<u>HOME/PI</u>	<u>LIHTF</u>
Aspen Village	\$80,000	\$00.00

All applications for funding are reviewed for compliance with HOME and federal regulations before an award is made and underwritten to ensure compliance throughout the period of affordability. In addition, all projects are reviewed to determine if relocation or replacement activities will be required. During FY 2013-2014 no households were displaced nor were any affordable housing units demolished, avoiding 104 activities. During PY 2011, the WCHC received \$206,383.10 in program income; it will be allocated during the annual WCHC funding process.

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:

GOAL	ACTUAL COMPLETED 2012	AMOUNT EXPENDED 2012	CPD PROGRAM
31	105	\$2,095,241	HOME (entitlement & PI)

**Construction was completed the 66 unit Arbor Cove Apartments (Virginia Lake Senior Project), 11 of which are Home-assisted.. This project serves households at or below 45% AMI and was allocated \$1,200,000 in HOME funding.**

**Volunteers of America completed construction on 39 one bedroom units at 2530 Paradise Drive, Reno, for seniors at or below 50% of the area median income. Eight of the 39 will be designated for individuals at or below 30%. The project was allocated \$895,241.**

Northern Nevada Community Housing Resource Board (NNCHRB), a WCHC Community Housing Development Organization, began construction on Aspen Village, in February/2013. NNCHRB was previously awarded One Million Eighty-Four Thousand and 00/100 dollars (\$1,084,000). Aspen Village is a forty-three (43) units of affordable rental housing, eleven (11) of which will be floating HOME units, at 1410 Sullivan Lane, Sparks, NV 89431 (APN 031-020-12), Aspen Village was completed Fall/2013 and occupancy began in December/2013.

Objective DH-1.1 (Availability/Accessibility of Decent Housing). Assist with the development of transitional housing and permanently affordable housing with supportive services, targeted to formerly homeless households and households with special needs.

*Performance measure:* Construct or rehabilitate 40 units of affordable and supportive housing during 5 year period.

GOAL	ACTUAL	AMOUNT EXPENDED	CPD PROGRAM
8	8	N/A	N/A(LIHTF)

***Bristlecone Transitional Housing, allocated \$589,694 in LIHTF, is an acquisition/rehabilitation project with eight (8) HOME-assisted transitional units. This project began May 2012 and was completed in 2013. The property is located at 712 and 704 Mill Street, 120 and 196 S. Wells Avenue, Reno, NV, 89502.***

Objective DH-2.2 (Affordability of Decent Housing). Support organizations that develop and rehabilitate rental housing.

GOAL	ACTUAL	AMOUNT EXPENDED	CPD PROGRAM
N/A	1	\$80,000	HOME

For FY2011-2012, NNCHRB was allocated \$80,000 in pre-development funds to develop a new 44 unit multi-family project. The resulting project will be Aspen Village, located at 1410 Sullivan Lane, Sparks, NV, 89431. Construction is scheduled to begin in late 2012 with completion in 2013. The 44 units will include 11 home units at or below 40% AMI.

## **Public Housing Strategy**

1. Describe actions taken during the last year to improve public housing and resident initiatives.

Forth Program Year CAPER Public Housing Strategy response:

The Reno Housing Authority (RHA) serves the region by providing affordable rental units, administering the Section 8 tenant based rental assistance program and through foreclosure prevention and mitigation activities.

No funds were provided to the Reno Housing Authority to improve public housing during the 2010 program year. Staff works with RHA as opportunities arise to increase affordable housing opportunities in the community and improve efficiency in meeting regional needs, including strong partnerships with special purpose and neighborhood stabilization program grants.



## **Barriers to Affordable Housing**

1. Describe actions taken during the last year to eliminate barriers to affordable housing.

Third Program Year CAPER Barriers to Affordable Housing response:

In Program Year 2008, the City of Sparks partnered with the City of Reno and Washoe County to develop The Analysis to Impediments to Fair Housing Choice (AI). The City of Reno Community Resources Division was the agency responsible for leading the AI review team. The AI research and final report was prepared by Western Economic Services, LLC, a Portland, Ore. consulting firm specializing in analysis and research in support of housing and community development planning. Within the AI a number of barriers to affordable housing and fair housing were identified; however, the barriers were not specifically related to public policies affecting the cost of housing development.

No regulatory barriers to affordable housing were identified through the self-evaluation process. The process of developing affordable housing in Sparks simply follows the development requirements of all projects, and has been facilitated through the adoption of transit-oriented-development zoning which permits multi-family housing in these districts "by right".

## **HOME/ American Dream Down Payment Initiative (ADDI)**

1. Assessment of Relationship of HOME Funds to Goals and Objectives
  - a. Evaluate progress made toward meeting goals for providing affordable housing using HOME funds, including the number and types of households served.
2. HOME Match Report
  - a. Use HOME Match Report HUD-40107-A to report on match contributions for the period covered by the Consolidated Plan program year.
3. HOME MBE and WBE Report
  - a. Use Part III of HUD Form 40107 to report contracts and subcontracts with Minority Business Enterprises (MBEs) and Women's Business Enterprises (WBEs).
4. Assessments
  - a. Detail results of on-site inspections of rental housing.
  - b. Describe the HOME jurisdiction's affirmative marketing actions.
  - c. Describe outreach to minority and women owned businesses.

Forth Program Year CAPER HOME/ADDI response:

**The following is provided via the City of Sparks participation in the Washoe County HOME Consortium; the City of Reno is the lead fiscal and administrative entity:**

1. Following is a review of the progress toward the goals established in the 2010-2014 Consolidated Plan:

**See Specific Housing Objectives, pages 14-17**

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

	<b>At or below 30% = Goal 45 Units</b>	<b>At or Below 50% = Goal 110 Units</b>	<b>Over 50% = Goal 0 Units</b>	<b>Type: Family/Senior /Transitional</b>
<b>Totals</b>	<b>6</b>	<b>39</b>	<b>0</b>	Senior/Transition

**Construct New Transitional Housing Projects - Goal 40 Units/8 per year (at or below 50%)**

	<b>At or below 30%</b>	<b>At or below 50%</b>	<b>Over 50%</b>	<b>Type: Family/Senior /Transitional</b>
<b>Total</b>	<b>0</b>	<b>8</b>	<b>0</b>	Transitional

**HOME Down Payment Assistance – Goal 50 Units/10 per year**

Home Down Payment Assistance	30-50%	50-80%
<b>Total</b>	<b>0</b>	<b>0</b>

**Deposit and Rental Assistance – Goal 100 clients/20 per year**

Rental and Utility Deposit Assistance (LIHTF)	At or below 50%
<b>Total</b>	<b>55</b>

While numerical unit goals for seniors and transitional housing continue to be met and/or exceeded, unfortunately we have been unable to meet established goals for families and/or households at or below 30% AMI, even seniors. These types of housing were prioritized, but the WCHC uses a Request for Proposal process to identify and fund viable projects and developers have been non-responsive to these identified priorities.

Therefore, staff has continued to work with the TRC and Directors regarding the importance of prioritizing projects or funding those submitted that meet the goals of the Consolidated Plan. The WCHC continuously works at refining a process to ensure those most in need are served. The TRC, in its expanding role, developed and recommended to the Directors multi-year priorities for development projects. These were approved in 2011. The priorities are based on two levels:

The Level I priorities are:

<b>Level I Priorities</b>	<b>Reason</b>
Project must provide units at or below 40% of the Area Median Income for family units; at or below 45% of	Area has need for units affordable to lower income tenants

Area Median Income for senior projects	
Projects that provide permanent housing, especially in conjunction with supportive services, for individuals and households emerging from homelessness.	The federal HEARTH Act, which authorizes funding for the region’s homeless services and housing through HUD, will re-focus homeless service delivery away from emergency services and toward a “housing first” model.

The Level II priorities are:

<b>Level II Priorities</b>	<b>Reason</b>
On transit corridor	Families/seniors need affordable, available transportation
Green Component	Creates savings for project and tenants/adds to sustainability of project – exceeds standards set for new construction/rehab as applicable
Consolidated Plan	Project must address/take into consideration consolidated plan goals ( <a href="http://www.reno.gov/Index.aspx?page=1260">http://www.reno.gov/Index.aspx?page=1260</a> )
Regional Plan	Project must address/take into consideration regional plan goals
10 Year Plan to End Homelessness	Project should address 10 year plan to end homelessness ( <a href="http://www.reno.gov/Index.aspx?page=13640">http://www.reno.gov/Index.aspx?page=13640</a> )
Mixed Income/Use Projects	Goal is to integrate income levels, increase individuals’ opportunities and improve community stability

Level I priorities will be funded if the project is viable and other projects that meet a Level II priority may be funded if there are additional resources available. These priorities are communicated to developers and provided in all applications. Priorities are reviewed bi-annually and are changed and will be dictated by market need and/or economic changes.

Monitoring has shown that properties are lowering rental rates to retain present renters and are having difficulty with vacancy rates, even when providing special incentives such as free month’s rent or smaller/no deposits. Properties that have rents set at the maximum HOME limits are especially hard hit.

2. The HOME Match Report is prepared by the City of Reno, the lead entity for the WCHC. A copy is attached.
3. The information reported on the MBE/WBE form relates to the River Senior, Silver Sage and WestCare projects which were completed during the program year.
4. Annually, 15-20 percent of all assisted rental units are inspected for compliance with minimum property standards and local building codes and/or HQS requirements. All

required inspections were completed by June 30, 2012. Final monitoring review letters were been mailed with responses due back from the individual projects within 45 days. Tenant files reviewed appeared to be in general compliance with HUD rules and regulations. Those that needed further clarification, documentation, or organization were noted in review letters sent to the owner and project managers who were required to take appropriate corrective action.

Monitoring is considered complete when requested documentation is received and approved. During physical monitoring, it again was noted that the biggest issues requiring corrective action be taken at a property was the frequent change in project managers or management companies. New management companies or managers were often not apprised of outstanding issues or actions that needed to be taken to complete a previous monitoring request when taking over the property or were not familiar with the HOME program.

In addition, new managers are often not familiar with the HOME program requirements, although they have HOME units in the project. HOME units are often mixed with Tax Credit Units and managers are confused or unfamiliar with how the two programs work together. When monitoring these differences are discussed with the managers and staff and information and references are often provided to clarify questions arising about over income tenants, rent limits, etc. New management companies often change to new leases. Those unfamiliar with the HOME program often did not understand or realize that there are prohibitive lease provisions of which they should be aware. WCHC staff reviewed leases at monitoring and found some prohibited lease requirements in those that had been amended or replaced recently. These were reported to the managers and it was requested that the leases be reviewed by their legal staff and amended to remove these provisions. Amended/revised leases are submitted to the WCHC as a part of their monitoring.

WCHC staff tracks the 45 day response period and calls properties to make certain that final reports or information are provided and monitorings are closed satisfactorily. If issues arise, staff works with the manager or property management company to address the noted issues.

The WCHC *Affirmative Marketing Plan* applies to all projects and programs funded by the WCHC. The goals of this program are implemented by 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; keeping informed about fair housing laws and practices; informing clients and customers about their rights and responsibilities under the fair housing laws by providing verbal and written information; evaluating the effectiveness and compliance of all marketing as it relates to fair housing; including the equal opportunity logo or slogan, and the accessibility logo-type where applicable, in all ads, brochures, and written communications to owners and potential tenants; displaying the fair housing posters in rental offices and other appropriate locations; soliciting applications for vacant units from persons who are least likely to apply for assistance without benefit of special outreach efforts and to work with the local public housing authority and other service and housing agencies to distribute information to a wide and diversified population; maintaining records of applicants for vacant positions; working to alleviate issues for those clients who are limited in English proficiency; and requiring funding applicants to certify adherence to fair housing requirements. WCHC monitoring includes a review of fair housing compliance. A property's failure to comply might result in the WCHC providing more specific guidelines for compliance,

or the WCHC might recover the HOME funds invested in the project. The WCHC refers fair housing questions to Silver State Fair Housing and utilizes them for reference and information.

WCHC includes certificates and assurances in the funding application package in which applicants are required to certify that they will comply with Section 3 of the Housing and Urban Development Act of 1968, as amended, and the minority/women's business enterprise participation effort.

## HOMELESS

### Homeless Needs

\*Please also refer to the Homeless Needs Table in the Needs.xls workbook.

1. Identify actions taken to address needs of homeless persons.
2. Identify actions to help homeless persons make the transition to permanent housing and independent living.
3. Identify new Federal resources obtained from Homeless SuperNOFA.

Third Program Year CAPER Homeless Needs response:

The City of Sparks, as does the City of Reno and Washoe County, provide administrative funds for the planning and submission of the Continuum of Care (CoC), which operates through the Reno Area Alliance for the Homeless (RAAH). The CoC continues to provide much needed permanent supportive housing in the community. RAAH meetings, public forums, and strategic planning activities all focused on increasing awareness of homelessness and housing first strategies among service providers. As a result, chronic homelessness is now referenced in the Washoe County Human Services Strategic Plan and in the Fund for a Healthy Nevada/State of Nevada Grants Management Unit prioritization and assessment reports.

The three jurisdictions continue to pool funds, including HUD Emergency Shelter Grant and Community Development Block Grant monies, to support shelter operations. Staff will continue to support activities at the CAC and ultimately work to build collaborations between housing and service providers to increase the supply of supportive housing in the community. The WCHC prioritizes housing options that provide supportive services for individuals recovering from homelessness is prioritized.

The entire facility opened in October 2008, and the City has continues to contract with Volunteers of America of Greater Sacramento and Northern Nevada, a non-profit entity, to operate the shelters. A variety of additional services are provided by additional non-profit organizations at the CAC. Additional services include health and mental health services, employment assistance, disability advocacy, drug and alcohol treatment, and services to help people access mainstream welfare programs. The City of Reno also funded the operations of a Resource Center which assists individuals and families who are experiencing homelessness to access these programs as well as assist them in connecting with family, employment and other support systems through the use of internet and telephones, a message system, employment leads, mail service for those without a permanent address, and assistance in identifying appropriate housing options. In addition, the City of Reno has

allocated funds from the Washoe County HOME Consortium to provide rental and utility deposits for those individuals transitioning from homelessness into permanent housing.

For the homeless, there are several aggressive, regularly scheduled outreach activities that take place each week for persons living on the street through the Mobile Outreach Safety Team, a local partnership between mental health and law enforcement agencies, and the Veterans Administration Health Care for Homeless Veterans program. Once outreach occurs, persons are connected immediately to the most appropriate resources based upon their individualized needs. All outreach activities are conducted with resources that can immediately either provide a direct service or link the person to appropriate resources. For example, transportation is offered to assist the individual in accessing medical care, shelter, food, clothing, Washoe County Social Services and to access other mainstream resources. If a need is identified during the outreach episode that cannot immediately be addressed, case management and follow up occurs to ensure the individual receives the services they need.

RAAH providers have worked to increase homeless persons' length of stay in emergency or transitional housing, rather than experiencing a relapse into street homelessness, and to increase the income of chronically homeless individuals to assist in the transition to permanent housing and independent living. To achieve this objective, RAAH members have evaluated admission and discharge policies of existing programs to determine barriers to stay for chronically homeless participants. They identified strategies to increase the length of stay by revising admission and discharge criteria and policies at programs serving chronically homeless. Further, they implemented extended stay strategies for chronic homelessness in a number of programs and have promoted the use of a single application form to apply for mainstream resources. Finally, RAAH has conducted orientation for service providers of how to access mainstream resources for chronically homeless clients based on TA received from Home Base so as to enhance their ability to transition to permanent housing by ensuring they have the wrap around resources for which they are eligible. Efforts have also been undertaken to implement the SOAR program in earnest and improve the ability of workers to assist their clients to access Social Security Disability as well as Food Stamps and Medicaid.

In addition, the City of Reno led efforts to organize the 4<sup>th</sup> annual Project Homeless Connect. This large service fair provides a one stop access to over 50 service providers, one day per year.

## **Specific Homeless Prevention Elements**

1. Identify actions taken to prevent homelessness.

Forth Program Year CAPER Specific Housing Prevention Elements response:

In addition to the efforts outlined in the previous section, the City of Sparks provided direct funding from its CDBG allocation toward the operations of the Community Assistance Center (CAC) campus located on Record Street in Reno.

For Fiscal Year 2011-12, the City of Sparks provided \$84,976 toward the operation of the CAC and its Tom Vetica Resource Center. Within this center, clients experiencing, and at risk of, homelessness have access to case managers for service in-take and referrals. Other elements of the Resource Center is the availability of telephones, voicemail and mail service, similar to a post office box, which enables those experiencing, and at risk of, homelessness the utility of an address and voicemail for follow-up to job interviews and receipt of mainstream resources to secure housing.

## Emergency Shelter Grants (ESG)

1. Identify actions to address emergency shelter and transitional housing needs of homeless individuals and families (including significant subpopulations such as those living on the streets).
2. Assessment of Relationship of ESG Funds to Goals and Objectives
  - a. Evaluate progress made in using ESG funds to address homeless and homeless prevention needs, goals, and specific objectives established in the Consolidated Plan.
  - b. Detail how ESG projects are related to implementation of comprehensive homeless planning strategy, including the number and types of individuals and persons in households served with ESG funds.
3. Matching Resources
  - a. Provide specific sources and amounts of new funding used to meet match as required by 42 USC 11375(a)(1), including cash resources, grants, and staff salaries, as well as in-kind contributions such as the value of a building or lease, donated materials, or volunteer time.
4. State Method of Distribution
  - a. States must describe their method of distribution and how it rated and selected its local government agencies and private nonprofit organizations acting as subrecipients.
5. Activity and Beneficiary Data
  - a. Completion of attached Emergency Shelter Grant Program Performance Chart or other reports showing ESGP expenditures by type of activity. Also describe any problems in collecting, reporting, and evaluating the reliability of this information.
  - b. Homeless Discharge Coordination
    - i. As part of the government developing and implementing a homeless discharge coordination policy, ESG homeless prevention funds may be used to assist very-low income individuals and families at risk of becoming homeless after being released from publicly funded institutions such as health care facilities, foster care or other youth facilities, or corrections institutions or programs.
  - c. Explain how your government is instituting a homeless discharge coordination policy, and how ESG homeless prevention funds are being used in this effort.

Third Program Year CAPER ESG response:

The City of Sparks is not an Emergency Shelter Grant (ESG) recipient; therefore, this section is not applicable.

## COMMUNITY DEVELOPMENT

### Community Development

\*Please also refer to the Community Development Table in the Needs.xls workbook.

1. Assessment of Relationship of CDBG Funds to Goals and Objectives
  - a. Assess use of CDBG funds in relation to the priorities, needs, goals, and specific objectives in the Consolidated Plan, particularly the highest priority activities.

- b. Evaluate progress made toward meeting goals for providing affordable housing using CDBG funds, including the number and types of households served.
  - c. Indicate the extent to which CDBG funds were used for activities that benefited extremely low-income, low-income, and moderate-income persons.
2. Changes in Program Objectives
  - a. Identify the nature of and the reasons for any changes in program objectives and how the jurisdiction would change its program as a result of its experiences.
3. Assessment of Efforts in Carrying Out Planned Actions
  - a. Indicate how grantee pursued all resources indicated in the Consolidated Plan.
  - b. Indicate how grantee provided certifications of consistency in a fair and impartial manner.
  - c. Indicate how grantee did not hinder Consolidated Plan implementation by action or willful inaction.
4. For Funds Not Used for National Objectives
  - a. Indicate how use of CDBG funds did not meet national objectives.
  - b. Indicate how did not comply with overall benefit certification.
5. Anti-displacement and Relocation – for activities that involve acquisition, rehabilitation or demolition of occupied real property
  - a. Describe steps actually taken to minimize the amount of displacement resulting from the CDBG-assisted activities.
  - b. Describe steps taken to identify households, businesses, farms or nonprofit organizations who occupied properties subject to the Uniform Relocation Act or Section 104(d) of the Housing and Community Development Act of 1974, as amended, and whether or not they were displaced, and the nature of their needs and preferences.
  - c. Describe steps taken to ensure the timely issuance of information notices to displaced households, businesses, farms, or nonprofit organizations.
6. Low/Mod Job Activities – for economic development activities undertaken where jobs were made available but not taken by low- or moderate-income persons
  - a. Describe actions taken by grantee and businesses to ensure first consideration was or will be given to low/mod persons.
  - b. List by job title of all the permanent jobs created/retained and those that were made available to low/mod persons.
  - c. If any of jobs claimed as being available to low/mod persons require special skill, work experience, or education, provide a description of steps being taken or that will be taken to provide such skills, experience, or education.
7. Low/Mod Limited Clientele Activities – for activities not falling within one of the categories of presumed limited clientele low and moderate income benefit
  - a. Describe how the nature, location, or other information demonstrates the activities benefit a limited clientele at least 51% of whom are low- and moderate-income.
8. Program income received
  - a. Detail the amount of program income reported that was returned to each individual revolving fund, e.g., housing rehabilitation, economic development, or other type of revolving fund.
  - b. Detail the amount repaid on each float-funded activity.



- c. Detail all other loan repayments broken down by the categories of housing rehabilitation, economic development, or other.
  - d. Detail the amount of income received from the sale of property by parcel.
9. Prior period adjustments – where reimbursement was made this reporting period for expenditures (made in previous reporting periods) that have been disallowed, provide the following information:
  - a. The activity name and number as shown in IDIS;
  - b. The program year(s) in which the expenditure(s) for the disallowed activity(ies) was reported;
  - c. The amount returned to line-of-credit or program account; and
  - d. Total amount to be reimbursed and the time period over which the reimbursement is to be made, if the reimbursement is made with multi-year payments.
10. Loans and other receivables
  - a. List the principal balance for each float-funded activity outstanding as of the end of the reporting period and the date(s) by which the funds are expected to be received.
  - b. List the total number of other loans outstanding and the principal balance owed as of the end of the reporting period.
  - c. List separately the total number of outstanding loans that are deferred or forgivable, the principal balance owed as of the end of the reporting period, and the terms of the deferral or forgiveness.
  - d. Detail the total number and amount of loans made with CDBG funds that have gone into default and for which the balance was forgiven or written off during the reporting period.
  - e. Provide a List of the parcels of property owned by the grantee or its subrecipients that have been acquired or improved using CDBG funds and that are available for sale as of the end of the reporting period.
11. Lump sum agreements
  - a. Provide the name of the financial institution.
  - b. Provide the date the funds were deposited.
  - c. Provide the date the use of funds commenced.
  - d. Provide the percentage of funds disbursed within 180 days of deposit in the institution.
12. Housing Rehabilitation – for each type of rehabilitation program for which projects/units were reported as completed during the program year
  - a. Identify the type of program and number of projects/units completed for each program.
  - b. Provide the total CDBG funds involved in the program.
  - c. Detail other public and private funds involved in the project.
13. Neighborhood Revitalization Strategies – for grantees that have HUD-approved neighborhood revitalization strategies
  - a. Describe progress against benchmarks for the program year. For grantees with Federally-designated EZs or ECs that received HUD approval for a neighborhood revitalization strategy, reports that are required as part of the EZ/EC process shall suffice for purposes of reporting progress.

Forth Program Year CAPER Community Development response:

In 2013, each of the high priority goals were addressed and at least partially met. The City has identified funding for the City Single Family Owner-Occupied Housing Rehabilitation Program and Public Services as the Highest Priorities. In addition, a public facility improvement project (Pedestrian Improvements) was planned and is nearly completed. No funding was allocated or expensed on activities that did not meet a national objective as prescribed by HUD. The one

**Priority need – Physical Improvements, Pedestrian Improvements:**

The City’s PY 2013-14 Annual Action Plan identifies a target area for the City’s Pedestrian Improvements activity as bounded 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. This project area was selected based on its location in a low-income area, meeting the LMI area benefit under the suitable living environment objective and availability/accessibility outcome.

The City allocated CDBG funds in the amount of \$506,069 toward pedestrian improvements. Of this amount, approximately, \$286,931 is new funding and \$219,138 is from previous years. The project undertaken during PY 2013 was on 4<sup>th</sup> Street between Prater Way and Victorian Avenue and on the directly adjacent side street blocks to the east and west. The work performed under this activity primarily consisted of removing and replacing concrete curb, gutter and sidewalks, installing accessibility ramps, driveway approaches, and street repairs as necessary. The project has largely been completed with the balance of the funds being held to install heat-sensitive landscaping (i.e., trees) during cooler weather this coming Fall Season.

**Priority need – Housing Rehabilitation:**

The City of Sparks continued to provide its Single Family, Owner-Occupied Housing Rehabilitation Home Loan and Emergency grant programs.

	Goal	Accomplishment	
Households Assisted	10	16	
	Low Income (80% AMI)	Very Low Income (50% AMI)	Extremely Low Income (30% AMI)
Households Assisted	11	3	2

In PY 2013-14, the City of Sparks allocated \$145,000 for its Single Family, Owner-Occupied Housing Rehabilitation Home Loan and Emergency grant programs. A total of \$97,574 was expended during PY 2013 for program administration and to provide loans and grants to a total of sixteen (16) households assisted through the City’s Rehab program – six (6) with Single Family Owner-Occupied Housing Rehabilitation loans and fifteen (10) with Emergency Grants. As noted elsewhere in this report, the local housing market remained a challenge in PY 2013 with values substantially below the “peak values” at which many homes were purchased or refinanced. This has made it difficult for many households interested in the City’s loan program to qualify as they lack sufficient equity in their homes to meet the program’s loan-to-value standard, which the City has had to raise. There has been, however, more interest in the City’s Emergency Grants.

The City’s 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 maximum amount of the loan is \$20,000. The loan is secured by a Deed of Trust on the home and must be paid back upon sale of residence, transfer of title, or when the original applicant(s) no longer resides in the home. There are no monthly payments or interest charges assessed. The loan may be paid off early at any time. The city has set the goal of serving ten (10) households per annum. The following repairs are eligible under the program:

- Any necessary repair to preserve health and safety
- Roofing
- Mechanical
- Electrical
- Plumbing
- Doors (including hardware)
- Windows
- Insulation (minimum code requirement)
- Foundation
- Wall Repair (drywall & plaster)
- Floor covering
- ADA Issues
- Lead Based Paint & Asbestos abatement (during general rehab activities)
- Counter Tops & Cabinetry

The second is The Emergency Repair Grant which is designed to assist owner/occupants at or below 60% of area median income, residing within the City of Sparks, to make immediate corrections or necessary repairs to their homes. The maximum amount of the grant is \$2,500. The following repairs are eligible under the program:

- Any necessary repair to preserve health and safety
- Roofing
- Inadequate heating & cooling
- Inadequate plumbing
- Retrofitting for disabled
- Insulation (minimum code requirement)
- Electrical hazards

Any program income generated by the housing rehabilitation program is deposited in the city Revolving Loan fund and used prior to any new entitlement dollars for the Housing Rehabilitation projects.

***Priority need - Public Services:***

The City of Sparks committed the maximum of 15%, or \$81,777, of its PY 2013 CDBG allocation to fund the provision of services for the homeless at the Community Assistance Center located in Reno. The CAC includes shelters for men, women and families as well as a resource center. Total annual funding for the CAC provided by Reno, Sparks and Washoe County is approximately \$1.5 million.

In PY 2013-14, the City of Sparks also provided \$18,330 from its General Fund, an amount equivalent to 15% of its CDBG, to support the Community Triage Center on the campus of the Community Assistance Center (CAC). The City allocated this funding through its participation with the City of Reno and Washoe County in the Washoe County Human Services Consortium (WCHSC).

As previously discussed and as part of the city's Planning and Administrative activities, Sparks continued to collaborate and consult for Fair Housing Activities and for the facilitation of the Continuum of Care process.

### ***Priority need – Public Facility Improvements***

In addition to amending the Pedestrian Improvements activity, the City's 2013 Action Plan included a new activity: to utilize up to \$188,000 in unspent funds from a previous year to fund improvements at the Community Assistance Center (i.e., the homeless shelter facility) located on Record Street in Reno. The proposed improvements are: a new electric gate and fencing; new lighting and cameras; and new freeze/thaw resistant drinking fountains in the day use area. The proposed security gate and cameras are intended 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 Sparks is in the process of working with the City of Reno to initiate this project. Progress was made in 2012-13 and the City of Sparks completed the project in PY 2013-14.

### **Antipoverty Strategy**

1. Describe actions taken during the last year to reduce the number of persons living below the poverty level.

Forth Program Year CAPER Antipoverty Strategy response:

Given the continuing economic crisis resulting in double digit unemployment rates (currently still hovering around 12% in Washoe County) it is reasonable to conclude that the number of Sparks residents living in poverty has likely grown in recent years. Many of these individuals are the working poor who cannot afford services such as health or child care; some are homeowners who have had to forego maintaining their homes.

In PY 2013, the City of Sparks committed the maximum amount allowable of the annual CDBG entitlement toward funding area public services to meet the very basic needs of low-income families and individuals. This funding was allocated to support the operations of the Community Assistance Center, the homeless shelter facility located in Reno, This facility not only provides temporary housing to homeless individuals and families but also has on-site services available. In addition, the City of Sparks Parks and Recreation department is a primary provider of before and after school care programs in Sparks, thereby enabling working poor families to have affordable care options for their children.

The City also continued to operate its Single Family Owner-Occupied Housing Rehabilitation programs – providing deferred loans and emergency grants – to assist low and moderate income households with critical health and safety repairs. These programs offer loans and grants of for housing repairs such as roofing, siding, plumbing, electrical, heating and energy efficiency upgrades. By providing these programs the City is working toward the goal of sustaining affordable housing and prevention of displacement.

The Washoe County HOME Consortium (WCHC) has assigned a high priority to housing projects that serve extremely low and very low income households. While not directly comparable, HUD's 30 percent of income cutoffs are similar to the poverty thresholds for different size families. Therefore, by prioritizing the creation and preservation of affordable

housing for extremely low income households the City of Sparks, as a partner in the WCHC, is working towards creating additional housing opportunities for households in poverty.

## NON-HOMELESS SPECIAL NEEDS

### Non-homeless Special Needs

1. Identify actions taken to address special needs of persons that are not homeless but require supportive housing, (including persons with HIV/AIDS and their families).

Forth Program Year CAPER Non-homeless Special Needs response:

**The following is provided via the City of Sparks participation in the Washoe County HOME Consortium; the City of Reno is the lead fiscal and administrative entity:**

#### ***Priority Need: Tenant-Based Rental Assistance***

The only current TBRA program utilizes non-federal funds and assists homeless individuals move into permanent housing. The City of Reno was awarded \$300,000 to implement a new TBRA program which will begin in FY 2013-2014.

#### ***Priority Need: Permanent-Supportive Housing Facility for Seniors***

Arbor Cove and Paradise Manor II Apartments were completed in 2013, providing 105 units, 45 of which were HOME assisted units. Of those 45, six (6) serve households at or below 30% of AMI and the remaining thirty-nine (39) units are affordable for households at or below 50% of AMI.

### Specific HOPWA Objectives

\*Please also refer to the HOPWA Table in the Needs.xls workbook.

1. Overall Assessment of Relationship of HOPWA Funds to Goals and Objectives  
Grantees should demonstrate through the CAPER and related IDIS reports the progress they are making at accomplishing identified goals and objectives with HOPWA funding. Grantees should demonstrate:
  - a. That progress is being made toward meeting the HOPWA goal for providing affordable housing using HOPWA funds and other resources for persons with HIV/AIDS and their families through a comprehensive community plan; That community-wide HIV/AIDS housing strategies are meeting HUD's national goal of increasing the availability of decent, safe, and affordable housing for low-income  
Arbor Cove and Paradise Manor II Apartments were completed in 2013, providing 105 units, 45 of which were HOME assisted units. Of those 45, six (6) serve households at or below 30% of AMI and the remaining thirty-nine (39) units are affordable for households at or below 50% of AMI.
  - b. persons living with HIV/AIDS;
  - c. That community partnerships between State and local governments and community-based non-profits are creating models and innovative strategies to serve the housing and related supportive service needs of persons living with HIV/AIDS and their families;

- d. That through community-wide strategies Federal, State, local, and other resources are matched with HOPWA funding to create comprehensive housing strategies;
  - e. That community strategies produce and support actual units of housing for persons living with HIV/AIDS; and finally,
  - f. That community strategies identify and supply related supportive services in conjunction with housing to ensure the needs of persons living with HIV/AIDS and their families are met.
2. This should be accomplished by providing an executive summary (1-5 pages) that includes:
    - a. Grantee Narrative
      - i. Grantee and Community Overview
        - (1) A brief description of your organization, the area of service, the name of each project sponsor and a broad overview of the range/type of housing activities and related services
        - (2) How grant management oversight of project sponsor activities is conducted and how project sponsors are selected
        - (3) A description of the local jurisdiction, its need, and the estimated number of persons living with HIV/AIDS
        - (4) A brief description of the planning and public consultations involved in the use of HOPWA funds including reference to any appropriate planning document or advisory body
        - (5) What other resources were used in conjunction with HOPWA funded activities, including cash resources and in-kind contributions, such as the value of services or materials provided by volunteers or by other individuals or organizations
        - (6) Collaborative efforts with related programs including coordination and planning with clients, advocates, Ryan White CARE Act planning bodies, AIDS Drug Assistance Programs, homeless assistance programs, or other efforts that assist persons living with HIV/AIDS and their families.
      - ii. Project Accomplishment Overview
        - (1) A brief summary of all housing activities broken down by three types: emergency or short-term rent, mortgage or utility payments to prevent homelessness; rental assistance; facility based housing, including development cost, operating cost for those facilities and community residences
        - (2) The number of units of housing which have been created through acquisition, rehabilitation, or new construction since 1993 with any HOPWA funds
        - (3) A brief description of any unique supportive service or other service delivery models or efforts
        - (4) Any other accomplishments recognized in your community due to the use of HOPWA funds, including any projects in developmental stages that are not operational.
      - iii. Barriers or Trends Overview
        - (1) Describe any barriers encountered, actions in response to barriers, and recommendations for program improvement
        - (2) Trends you expect your community to face in meeting the needs of persons with HIV/AIDS, and
        - (3) Any other information you feel may be important as you look at providing services to persons with HIV/AIDS in the next 5-10 years
    - b. Accomplishment Data

- i. Completion of CAPER Performance Chart 1 of Actual Performance in the provision of housing (Table II-1 to be submitted with CAPER).
- ii. Completion of CAPER Performance Chart 2 of Comparison to Planned Housing Actions (Table II-2 to be submitted with CAPER).

Forth Program Year CAPER Specific HOPWA Objectives response:

The City of Sparks is not a HOPWA recipient; therefore, this section is not applicable.

## OTHER NARRATIVE

Include any CAPER information that was not covered by narratives in any other section.

Second Program Year CAPER Other Narrative response:

### **Limited English Proficient:**

The Washoe County HOME Consortium Client Submission Form (CSF), submitted by apartment complexes each year at their annual monitoring visit, serves to track tenant information, which includes new tenant primary language. Tenants are requested to voluntarily answer the question as to the primary language spoken in their home upon unit rental. Based on the information on these forms, it appears that the information obtained from the CSF is a reliable reflection of the languages spoken in our rental complexes and that individuals are more likely to provide reliable information when obtaining a unit than when completing a survey.

Although not directly related to the CSF, it has been noted during monitoring that properties with a substantial population of Spanish speaking tenants have bilingual office and/or maintenance staff, a great benefit to the complexes and their tenants. We see marketing and rental information printed in both English and Spanish.

### **Section 3**

It is the policy of the City of Sparks, to require its 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 Sparks requires that all Section 3 covered contracts include the Section 3 Clause, which basically states that all work to be performed under the contract requires, to the greatest extent feasible, opportunities for training and employment be given to lower income residents of the area of the Section 3 project and contracts for work in connection with the project be awarded to business concerns located in or owned in substantial part by persons residing in the area of the Section 3 project.

The economic situation has resulted in many contractors struggling just to retain current employees; as a result the Section 3 new employee numbers are very low or non-existent. It is hoped that as the economy improves, so will the opportunity to hire new Section 3 eligible employees.