

CR-05 - Goals and Outcomes

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

91.520(a)

The City of Plymouth is a recipient of Community Development Block Grant (CDBG) entitlement funds through the U.S. Department of Housing and Urban Development (HUD). These funds are allocated and expended for activities benefitting City of Plymouth residents. HUD requires a summary submission of the annual performance for the programs. The following is an overview of accomplishments for the most current reporting period of July 1, 2019 - June 30, 2020. This is the fifth and final reporting period in the 2015-2019 Consolidated Plan cycle.

The City of Plymouth is one of three CDBG entitlement jurisdictions among 43 suburban communities within Hennepin County, and remains a part of the Hennepin County Consortium for the purposes of the Five-Year Consolidated Plan.

The City of Plymouth has used its allocations according to the directives given in the 2019 Annual Action Plan. Of the total estimated 2019 CDBG budget (2019 allocation of \$264,529 and \$50,000 in program income), \$225,529 was used for affordable housing projects, \$63,000 was used for public service activities, \$5,000 was used for fair housing activities, and \$21,000 was allocated for the administration of the CDBG program. Plymouth received \$95,409 in program income during the 2019 year that was reallocated back into the program. There was an estimated \$193,000 in funding available via carryover from the 2018 program year.

Comparison of the proposed versus actual outcomes for each outcome measure submitted with the consolidated plan and explain, if applicable, why progress was not made toward meeting goals and objectives. 91.520(g)

Categories, priority levels, funding sources and amounts, outcomes/objectives, goal outcome indicators, units of measure, targets, actual outcomes/outputs, and percentage completed for each of the grantee's program year goals.

Goal	Category	Source / Amount	Indicator	Unit of Measure	Expected – Strategic Plan	Actual – Strategic Plan	Percent Complete	Expected – Program Year	Actual – Program Year	Percent Complete
Direct homebuyer assistance	Affordable Housing	CDBG: \$	Direct Financial Assistance to Homebuyers	Households Assisted	15	12	80.00%	4	3	75.00%
Homelessness prevention	Non-Housing Community Development	CDBG: \$	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	25	57	228.00%	19	17	89.47%
Homeowner education	Non-Housing Community Development	CDBG: \$	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	300	163	54.33%	50	2	4.00%
Homeowner rehabilitation assistance	Affordable Housing	CDBG: \$	Homeowner Housing Rehabilitated	Household Housing Unit	40	42	105.00%	9	11	122.22%
Rental housing rehabilitation	Affordable Housing Non-Homeless Special Needs	CDBG: \$	Rental units rehabilitated	Household Housing Unit	8	17	212.50%	3	3	100.00%

Goal	Category	Source / Amount	Indicator	Unit of Measure	Expected – Strategic Plan	Actual – Strategic Plan	Percent Complete	Expected – Program Year	Actual – Program Year	Percent Complete
Senior services	Non-Housing Community Development	CDBG: \$	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	225	299	132.89%	60	61	101.67%
Tenant counseling	Non-Housing Community Development	CDBG: \$	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	1250	1376	110.08%	500	480	96.00%
Youth services	Non-Housing Community Development	CDBG: \$	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	500	420	84.00%	65	106	163.08%

Table 1 - Accomplishments – Program Year & Strategic Plan to Date

Assess how the jurisdiction's use of funds, particularly CDBG, addresses the priorities and specific objectives identified in the plan, giving special attention to the highest priority activities identified.

The City of Plymouth has three high priority needs that are addressed within the Consolidated Plan: 1. Preserve and Create Single Family Homeownership; 2. Preserve and Create Rental Housing; 3. Education, Outreach and Services. The City of Plymouth has worked to address these goals in a variety of ways, including rehabilitation of single-family owner occupied properties as well as financial assistance to first time homebuyers in a competitive housing market. The City of Plymouth also met its annual goal of preserving multifamily rental opportunities by working closely with sub-grantees. Of the six sub-grantees working in Education, Outreach and Services, two met or exceeded their annual goals. 11 Plymouth families received homelessness prevention assistance, and 6 families received direct assistance in the form of rental assistance while pursuing an educational degree. In addition, the owner-occupied Home Rehabilitation Program assisted 11 homeowners with necessary home repairs. The City also met its goal of assisting in rehabilitating affordable rental homes for special-needs individuals through the rehabilitation of three rental properties.

The First Time Homebuyer Program helped three households purchase their first home in Plymouth. The program continues to receive interest from potential homebuyers and mortgage lenders, though it is challenging to find a Plymouth home affordable enough for buyers who meet CDBG income limits.

Staff worked with lower-performing agencies throughout the year to identify issues that kept them from accomplishing their annual goals, as well as potential solutions to better serve residents of Plymouth. Many of the agencies who did not meet their goals were impacted by the COVID-19 pandemic beginning in early March 2020 and the subsequent need to shift many of their programs to remote/virtual platforms. Staff will continue to assist sub-grantees with achieving their indicated goals through increased communication, annual monitorings, and research of additional programs applicable under federal guidelines that serve a need in the City.

CR-10 - Racial and Ethnic composition of families assisted

Describe the families assisted (including the racial and ethnic status of families assisted).

91.520(a)

	CDBG
White	316
Black or African American	219
Asian	10
American Indian or American Native	4
Native Hawaiian or Other Pacific Islander	0
Total	549
Hispanic	2
Not Hispanic	547

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

Narrative

The 2018 American Community Survey (ACS) 1-year population estimate, which is the most recent available, gives Plymouth's population as 79,437. 75.8% of Plymouth's population identified as white alone, 6.9% identified as Black or African-American, and 11.8% identified as Asian. Clearly the percentage of households identifying as Black or African American that were assisted with CDBG funds (44%) is much higher than the proportion of Black or African-American households in the City overall. The opposite is true for white households - the percentage assisted (54%) is much lower than the proportion of Plymouth's total population.

The City of Plymouth actually served 584 households during the 2019 Program Year. Due to no inclusion for households identifying as multi-racial or other, however, 35 households were not able to be included in the total for Table 2.

CR-15 - Resources and Investments 91.520(a)

Identify the resources made available

Source of Funds	Source	Resources Made Available	Amount Expended During Program Year
CDBG	public - federal	701,832	511,884
LIHTC	public - federal	0	
Section 8	public - federal	0	
Tax Exempt Bond Proceeds	public - local	0	
Tax Increment Financing	public - local	0	
Other	private	0	
Other	public - local	0	
Other	public - state	0	

Table 3 - Resources Made Available

Narrative

The City of Plymouth uses CDBG funding in addition to funding provided through the HRA Affordable Housing Account, Local HRA Tax Levies, and the City of Plymouth Economic Development Fund. CDBG is just one resource available for the City's continual upkeep and improvement of housing throughout the City. The HRA Tax Levy is utilized to assist in the subsidizing of rental housing for senior citizen households throughout the City's senior housing portfolio. The HRA also provided funding to assist residents with energy audits and potential home improvements along with architectural design consultations for older housing stock. Finally, the Plymouth Economic Development Fund is available to provide funding for activities that help to create jobs, increase business activities, and increase the tax base within the City.

Narrative

Plymouth CDBG-funded programs are available to low- and moderate-income households throughout the City and are not otherwise geographically targeted. All qualifying residents within the City of Plymouth are able to receive assistance through the programs.

Leveraging

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

The City of Plymouth does not have any specific matching requirements associated with the CDBG program. The City uses funding from the HRA tax levy to assist with ongoing maintenance and upkeep of senior housing throughout the City. Plymouth also has an economic development fund which has been used previously to provide loans that help stimulate business activities to create job growth and increase the local tax base. Additionally, the City has an HRA-funded Rehabilitation program which assists homeowners who may not be income-eligible for the CDBG-funded Rehabilitation program.

The City works with the State of Minnesota's Center for Energy and Environment (CEE) to provide low-cost home energy assessment that may aid in decreasing energy costs for homeowners. Due to an aging housing stock in Plymouth, the HRA also funds an Architectural Design Program which provides architectural guidance to homeowners looking to make additions or remodel their current homes.

There is no publicly owned land or property in the City of Plymouth that was used to address needs identified in this plan.

CR-20 - Affordable Housing 91.520(b)

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

	One-Year Goal	Actual
Number of Homeless households to be provided affordable housing units	0	0
Number of Non-Homeless households to be provided affordable housing units	0	0
Number of Special-Needs households to be provided affordable housing units	3	3
Total	3	3

Table 4 – Number of Households

	One-Year Goal	Actual
Number of households supported through Rental Assistance	19	17
Number of households supported through The Production of New Units	0	0
Number of households supported through Rehab of Existing Units	9	11
Number of households supported through Acquisition of Existing Units	4	3
Total	32	31

Table 5 – Number of Households Supported

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

The City of Plymouth is part of the larger Hennepin County HOME Consortium, which focuses on affordable goals for Hennepin County. Plymouth used all 2019 program year funds to assist households at or below 80% of area median income (AMI), as defined by HUD. Plymouth provides assistance to residents through both a homebuyer assistance program and rehabilitation assistance for current homeowners. Due to an aging housing stock, the Rehabilitation Program has been generally successful in meeting goals provided by the Annual Action Plan. A tight housing market has made it more difficult for potential homebuyers to find properties available for purchase within the City of Plymouth.

Hammer Residences, Inc. was a 2019 subrecipient of CDBG funds, and rehabilitated 3 of their rental housing units. Hammer's units are made available to special-needs individual who are typically low or extremely-low income.

Finally, People Responding in Social Ministry (PRISM) and Interfaith Outreach , both of whom were 2019 CDBG subrecipients, provided rental assistance to clients participating in their respective programs. Plymouth CDBG funds granted to PRISM help provide rental assistance to Plymouth families for the purpose of homelessness prevention. Interfaith Outreach provides rental assistance to families who have a head of household pursuing an educational degree. In the case of Interfaith Outreach, Plymouth CDBG funds go towards case management costs for those families.

Discuss how these outcomes will impact future annual action plans.

The City of Plymouth will continue to analyze economic trends that contribute to the relative successes of the First Time Homebuyer and Home Rehabilitation programs. At the same time, the City will continue to target outreach towards households that are in need of assistance and meet income requirements - as well as local and regional organizations that work with these households - in order to spread awareness of available funding. Overall, the City will monitor the programs and adjust future Annual Action Plans accordingly.

Include the number of extremely low-income, low-income, and moderate-income persons served by each activity where information on income by family size is required to determine the eligibility of the activity.

Number of Households Served	CDBG Actual	HOME Actual
Extremely Low-income	248	0
Low-income	214	0
Moderate-income	122	0
Total	584	0

Table 6 – Number of Households Served

Narrative Information

The median household income for a family of 4 in the the City of Plymouth during the 2019 program year was \$100,000. The numbers in the table above are representative of populations that are part of Plymouth. The number of households assisted in the extremely low-income and low-income categories show people most in need of receiving assistance have increasingly had access to resources. The City CDBG program assists all residents with extremely-low, low- and moderate-incomes at or below 80% AMI.

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

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

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

The City of Plymouth is part of the Hennepin County Consortium and when presented with someone needing access to services to reduce or end homelessness, would refer them to our network of social service agencies as well as Hennepin County. The accomplishments stated within this objective are those of the Hennepin County Consortium.

St. Stephens Human Services (SSHS) operates a five-person street outreach team in Minneapolis that conducts initial engagement, harm minimization, and connection to services for people who are unsheltered. It conducts assessments and refers people directly to housing through the Continuum of Care's (CoC) Coordinated Entry System (CES). Hennepin County's Healthcare for the Homeless staff regularly accompany the outreach team to provide healthcare directly to those unsheltered or living outdoors. SSHS also has one additional outreach worker permanently based in the downtown library where large numbers of people experiencing homelessness convene during the day time.

In fall of 2017 the American Indian Community Development Corporation (AICDC) launched a new two-person outreach program targeted towards Native Americans with Substance Use Disorders who are unsheltered with linkages to a new low-barrier housing program for the same target population.

Youth-specific outreach workers are organized through a consortium of youth serving agencies and focus on identification and quick connection to services for youth who are unsheltered, particularly through the Youth Opportunity Center (YOC). The YOC hosts 20-30 different agencies and services in a single downtown location. Similarly, Catholic Charities operates the Adult Opportunity Center, a drop-in center offering an array of services to meet the needs of people experiencing homelessness, including assessment for CES, employment training and, again, healthcare services.

Hennepin operates a single point of entry into the shelter system for those who would otherwise go unsheltered, the Adult Shelter Connect (ASC). The ASC staff operate out of a well-publicized fixed location where they conduct the initial ESG assessment for all those seeking shelter, provide orientation to the shelter system, and make bed reservations at any of the adult shelters with capacity. The system maximizes utility of every bed in the system, thereby avoiding unsheltered nights wherever possible. An after-hours telephone service ensures that all unclaimed reservations can be re-allocated to those still in need of shelter.

Singles and families in shelter are also assessed with the VI-SPDAT and placed on the priority list for homeless-specific rapid rehousing, transitional housing, or permanent supportive housing. People

fleeing domestic violence are assessed through the county's "front door" and placed on the priority list.

Addressing the emergency shelter and transitional housing needs of homeless persons

The City of Plymouth works with the network of services that Hennepin County has available through the following:

Hennepin County has a "shelter all" family policy which guarantees shelter beds for any family experiencing homelessness. The shelter capacity for families expands as need demands. Families are assessed for Coordinated Entry within one week of shelter entry and referred to Transitional Housing, Rapid Rehousing, or Permanent Supportive Housing as appropriate.

For singles, Hennepin County's Adult Shelter Connect provides a central intake and referral to shelter and the ability of shelter guests to "reserve" a bed each night, ensuring that they have a safe place to sleep. Youth can use the ASC to access non-age-specific shelter, or can enter youth-designated shelters directly. This system works across five different providers and has allowed for greater specialization of shelter usage, particularly in transferring those guests in need of greater supports to shelters that offer more intensive case management.

Hennepin CoC has used the data gathered from the central intake to right-size the singles shelter bed inventory in terms of both number and types of beds in order to best meet the needs of single adults experiencing homelessness in Hennepin County. For example, since 2017, we converted a 50 bed winter shelter to a year-round shelter to increase capacity during the summer months, particularly for women and couples as the shelter specializes in serving these groups. Secondly, the funding for a 180 bed 24-hour shelter was converted in order to reduce barriers to entry, particularly in relation to financial cost to guests, increase utilization and allow more vulnerable folks to benefit from 24-hour shelter.

The CoC tracks length of stay in shelter and identifies people to be assessed with the VI-SPDAT through a Homeless Management Information System (HMIS) data report. Shelter workers, or a contracted assessor, then completes assessments on single adults and place them on the priority list through CES.

In addition, the City of Plymouth continues to work with a network of social service providers such as Interfaith Outreach and PRISM to assist persons experiencing homelessness or needing emergency shelter.

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

The City of Plymouth works with People Responding in Social Ministry (PRISM) and Interfaith Outreach as well as other social service agencies to address homeless issues. PRISM offers help with temporary housing assistance and payments in order to prevent homelessness for a small window of time. Interfaith Outreach's Project Success similarly offers rental assistance to families whose head of households is pursuing an educational degree. With any situation, when presented to the City of Plymouth, the issue would be addressed by any means possible as well as using Hennepin County's assistance and programs. As part of the County Consortium, the City of Plymouth has access to the following resources:

To the extent possible, people who are not literally homeless are first directed to “non-homeless” resources to assist in housing stability. Hennepin County offers emergency assistance for rent or utility bill arrears to keep people in their current housing. The county uses state dollars from Family Homeless Prevention and Assistance Program (FHPAP) for people needing additional financial assistance, supportive services, and case management. FHPAP resources are targeted to households with the greatest risk of homelessness using a targeting tool based on local and national resources.

Hennepin County's Housing Stability office works with county staff to identify and develop mainstream-funded housing opportunities for people being discharged from institutions. The County operates the “Hennepin Housing Key” which is an on-line resource of openings in specialized housing for people with disabilities or those experiencing homelessness. The Key, when fully implemented, will include up to 14,000 housing units with current availability. County and community case managers are using the Key to find housing for people exiting treatment or care or for County clients who need to move.

Hennepin County is currently partnered with local foundations to increase and improve our efforts to prevent homelessness. This has included an eviction prevention pilot, a shelter diversion program for families who could avoid a shelter stay by returning to their housing situation for a short period of time if they have assistance to find a more stable home, and flexible homeless prevention funding. The next phase is a community-wide visioning process to develop centralized access for coordinated homeless prevention resources.

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

For all populations, the focus is on making homelessness rare, brief, and non-recurring. Hennepin CoC was using the VI-F-SPDAT to assess people's vulnerability and need for supports to end a person's homelessness. Families (including young families) experiencing homelessness are assessed via the VI-F-SPDAT within a week of shelter entry. Single adults are assessed via the VI-SPDAT, and youth with the TAY-SPDAT, with the goal of assessing within 14 days of shelter entry.

All households are offered Permanent Supportive Housing, Rapid Rehousing, or Transitional Housing services, or identified as able to self-resolve, based on their vulnerability and program vacancies. The focus in shelter is on making the experience as brief as possible, but with sufficient supports in place upon housing to make a recurrence of homelessness rare. The Rapid Rehousing program has flexible rental and social service supports, so that supports can continue up to two years, as needed by the household. Although Hennepin CoC was one of the original developers of Rapid Rehousing, the CoC continues to innovate applications of rapid rehousing to expedite exits to and retention of permanent housing, including methods such as Critical Time Intervention, shared housing, and progressive engagement, including using rapid rehousing as a bridge to permanent supportive housing.

A by-name list has been established for anyone who has stayed longer than a year in shelter and therefore may be experiencing chronic homelessness ('the Chronic Index'). This list is used to target case management from the PATH-funded Hennepin County Homeless Access team and for bi-weekly case conferencing. Since adopting this approach in July 2017, 288 individuals experiencing chronic homelessness have been housed, with about a 6% return to shelter rate.

In 2018, Hennepin County launched two new programs to expedite exit from shelter. One program helps families to develop housing plans, ameliorate housing barriers such as open warrants and criminal records, and collect documentation needed for housing applications. Another program offers light-touch assistance to singles needing only minimal support to access housing opportunities. Finally, the Hennepin CoC uses state funds to support an intensive homeless prevention services for families that have been in shelter more than two times in the last two years. This program effectively reduces returns to shelter for these families. The CoC also targets all homeless prevention resources to households with past periods of homelessness. The number of families experiencing homelessness, as measured in the PIT has dropped year-on-year since 2014 achieving a cumulative reduction of more than 40 percent.

The City of Plymouth has access to these services and refers anyone needing help to the above services and to the extent possible, follows up to ensure the proper assistance was provided.

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

Actions taken to address the needs of public housing

The City of Plymouth has no federal public housing within its jurisdiction. The Plymouth HRA does administer approximately 308 Housing Choice Vouchers (HCV). HCV's provide federal rent subsidies for low-income individuals and families in privately owned, existing market-rate housing. The funding from HUD is paid directly to the owner of the property.

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

The City of Plymouth does not have any public housing within its jurisdiction, however, the Plymouth Housing and Redevelopment Authority (HRA) has two resident advisory boards - one for its HCV program and the other for the locally financed 99-unit subsidized senior housing development. The HCV Resident Advisory committee advises the HRA on policy development and review. The senior development - Plymouth Towne Square - has a residents' council which advises the HRA on management and resident services.

Actions taken to provide assistance to troubled PHAs

The Plymouth HRA administers the HCV Program and has been given the designation of a High Performing PHA.

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

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

The City does not face any significant negative effects due to public policies within the community. There are, however, state and/or federal regulations and taxing policies that may have a negative impact on the provision of affordable housing. The City collaborates with other public entities whenever possible to identify and mitigate policies, as well as other barriers to affordable housing. When partnering with developers and developments that encourage affordable housing, the City looks to assist in funding with Tax Increment Financing (TIF), and by working with the developers to mitigate costs and potential land issues that may arise.

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

The City of Plymouth continues to look for different ways to assist with affordable housing needs. Plymouth provides financial assistance to rehabilitate low- and moderate-income owner-occupied units, as well as downpayment, closing cost, homebuyer counseling and education assistance for income-qualifying households.

Additionally, Plymouth has a locally funded Rehabilitation Loan program to aid homeowners who do not qualify for CDBG funding but wish to rehabilitate their home. The City assists in funding the Center for Energy and Environment's Home Energy Squad program, which allows Plymouth homeowners to receive an energy audit for lower cost than normally offered by local utility companies. This audit helps discover energy conservation and efficiency options, while also providing homeowners with energy efficient products such as CFL lightbulbs and programmable thermostats.

In 2017, the City approved the preliminary plat and site plan for the Cranberry Ridge development, which will provide 45 affordable units at or below 60% AMI and will be made available to Housing Choice Voucher clients. Of the 45 units, 10 will be set aside for clients at or below 30% AMI. The development will receive financial assistance in the amount of \$527,000 from pooled Tax Increment Financing (TIF) funds. Additionally, \$250,000 of fees were waived associated with the project. The Metropolitan Council has also awarded the project an additional 10 project based vouchers. The project is currently in the process of finalizing its financing structure prior to breaking ground.

In 2019, the City approved the preliminary plat, site plan, and planned unit development amendment (PUDA) for the Four Seasons development. This large development will provide three buildings - one for seniors (268 units) and two for families (162 units between the two buildings). All 430 units would be held for households at or below 60% AMI. The development is also receiving TIF in an amount not to exceed \$5,031,000.

Finally, in early 2020 the City approved the PUDA for the Element building. This development will have 61 units, all of which will be made available to households at or below 60% AMI. Four of the units will be held for households at or below 30% AMI. The development is also receiving Tax Increment Financing in the amount of \$459,000, four Housing Choice Vouchers, and financial assistance from the Plymouth Housing and Redevelopment Authority in the amount of \$241,000 to assist with fees.

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

As part of the City's Rental Housing Licensing Program, all rental properties in the City are inspected at least every three years. The inspector has satisfied HUD's Risk Assessment Course and is a Certified Risk Assessor. All participants in the City's Housing Choice Voucher program that reside in housing built before 1978 receive copies of the EPA brochure "Protect Your Family From Lead in Your Home". All program participants in the City's Rehabilitation and First Time Homebuyer programs are also given the EPA brochure, regardless of the year their home was built.

The Plymouth HRA has incorporated procedures in the guidelines for all federally-funded programs in order to meet the requirements of federal Lead-Based Paint (LBP) regulations. Discussion of the LBP requirements occurs at any initial meetings with HRA staff, and all files require a Certification of Receipt of LBP regulations form signed by the applicant. All homes built prior to 1978 with deteriorated paint surfaces that may require lead hazard reduction work receive lead testing. Plymouth HRA contracts with a certified Risk Assessor to perform the needed tests to identify and clear lead hazard risks. Clearance reports are issued to all homeowners who had work done disturbing painted surfaces, and a copy is kept by the HRA in the homeowner's file.

Since 2004, Hennepin County has taken a comprehensive approach to preventing childhood lead poisoning, including community outreach and education, in-home education visits, lead risk assessments, lead hazard reduction, and contractor training. Hennepin County is currently administering a 2017 HUD Office of Lead Hazard Control and Healthy Homes grant in the amount of \$3.4 million to continue the program through 2021. Since 2003, the lead grant programs have completed over 4,700 lead hazard reduction projects. Hennepin County also recently received a grant award from the Centers for Disease Control, which will allow the County to increase outreach and education, especially to the most at-risk populations and geographies through mini-grants to community partners already serving those at-risk populations. These grants demonstrate the County's continued efforts to provide affordable and safe housing to its residents while working toward the goal of eliminating childhood lead poisoning. The funds may be used throughout Hennepin County.

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

Whenever possible, the City of Plymouth works diligently through its programs to identify and assist individuals and families at or below the poverty level. Collaboration with Public Safety and the Plymouth Housing Inspector helps identify homeowners and/or renters who may be in need of additional services. Through an established network of relationships with social service agencies, the City refers clients to

appropriate areas and assists with CDBG resources when applicable. There are also programs offered through the City of Plymouth, the Plymouth HRA and local non-profits that assist individuals and families experiencing poverty. PRISM and Interfaith Outreach are local organizations that help assist Plymouth residents at risk of or experiencing homelessness. HOME Line offers legal assistance to tenants engaged in rental disputes with their landlord or property manager. TreeHouse works with youth of the community to provide in- and after-school programming, and Senior Community Services assists low- and moderate-income senior homeowners with necessary home maintenance. As a member of the Hennepin County Consortium, Plymouth works closely with case managers from Hennepin County to alert the County whenever an individual in the jurisdiction may need additional assistance.

The upcoming Cranberry Ridge development will provide 45 units of affordable housing at or below 60% AMI. 10 of those units will be set aside for families at or below 30% AMI (extremely low income levels). The Four Seasons development will provide 430 units for households at or below 60% AMI. Finally, the Element development will provide 61 units of affordable housing at or below 60% AMI. Four of those units will be held for households at or below 30% AMI.

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

The City of Plymouth continues to coordinate with other institutions in the delivery of housing and community development programs. Whenever possible, the Plymouth HRA leverages CDBG funds with other state and local programming. The City coordinates with Hennepin County to deliver Healthy Homes grant funding to help with lead-based paint hazard reduction in conjunction with the CDBG Rehabilitation Loan Program. Minnesota Housing is also a resource recommended to potential homebuyers and current homeowners seeking to make home improvements.

The City also offers two programs to all homeowners for the explicit purpose of addressing specific needs in aging homes. The first is the Home Energy Squad program, which is a collaboration between the Center for Energy and Environment (CEE) and the Plymouth HRA to provide home energy audits to homeowners at a reduced cost. The HRA also funds the Architectural Design Program, which subsidizes the cost of having a qualified architect give remodeling advice to homeowners seeking to make improvements to their aging (30+ years old) homes.

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

The City of Plymouth has developed and maintained a strong collaborative relationship with other social service agencies and housing providers. Specifically, the City works with People Responding in Social Ministry (PRISM), Metropolitan Interfaith Council on Affordable Housing (MICAHA), Habitat for Humanity, the Housing Justice Center, and Interfaith Outreach.

All First Time Homebuyer loan recipients are required to attend HUD-approved homebuyer workshops presented by Home Stretch accredited workshops. Completing these required programs provides first time buyers with the information and education necessary to purchase a home.

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

The City of Plymouth is a member of the Fair Housing Implementation Council (FHIC) established in 2002 to coordinate regional efforts to comply with obligations affirmatively furthering fair housing throughout the Twin Cities Metropolitan housing market area. During the 2019 program year, the FHIC continued to address recommendations brought forth in the Addendum to the Regional Analysis of Impediments to Fair Housing (AI). Community engagement was completed through the RFP awarded in the 2016 program year. The FHIC released and began a new community engagement RFQ in the 2017 program year to assist in addressing underrepresented residents within Plymouth and assess the needs of these individuals and groups. The FHIC contracted with a group that began the community engagement process throughout the 2019 program with the purpose of releasing an updated AI during the 2020 program year.

The FHIC initiates activities that are designed to stop discrimination and promote integration. Such activities are a response to the 2001 AI, funded by participating metropolitan jurisdictions. The City of Plymouth has been an active member of this council, designating time and resources to ensure fair housing for all people - not only within the jurisdiction, but also the broader metropolitan area. Per the recommendations of the AI, Plymouth has worked as part of the Hennepin County Consortium. The Consortium provided funding to the Center for Urban and Regional Affairs (CURA) in order to study displacement of lower income and people of color in the suburbs specifically. Additional resources have gone to Fair Housing training for staff and potential decisionmakers in entitlement communities, as well as to work on Fair Housing trainings in a variety of languages.

The City of Plymouth specifically has worked to address items in the AI recommendations targeting Plymouth and other entitlement jurisdictions. Plymouth continues to be an active member of the FHIC, including distributing the recent RFQ to suburban-focused agencies in order to advance additional community engagement in the suburbs. Plymouth annually monitors subrecipients for compliance with Fair Housing guidelines, as well as requiring reports on client demographics on a quarterly basis. Plymouth provides vouchers for renters through the Housing and Redevelopment Authority, and subsequently follows all guidelines of Fair Housing as required by the Section 8 and HCV programs. The City encourages landlords to accept vouchers whenever possible to assist with more affordable housing options. The City also adopted a Fair Housing Policy in 2018. Staff continually monitors new state legislation to ensure programs are in compliance with existing and new statutes. The HRA continues to provide funding for rehabilitation and acquisition of existing affordable housing to assist low- and moderate-income households with the maintenance and purchase of homes within Plymouth. Finally, the Plymouth Community Development department employs a Housing Inspector who works as an intermediary between public safety, non-profit and assistance agencies, tenants and citizens.

CR-40 - Monitoring 91.220 and 91.230

Describe the standards and procedures used to monitor activities carried out in furtherance of the plan and used to ensure long-term compliance with requirements of the programs involved, including minority business outreach and the comprehensive planning requirements

Contracts are executed with all organizations implementing activities identified in the Consolidated Plan. The Plymouth HRA is responsible for contract administration and compliance, and has experience monitoring federal programs through CDBG grants in previous years. Monitoring is an ongoing process, incorporating six areas of activity:

Funding Agreement - For each program or project funded through consolidated plan resources, the applicant will be required to enter into a funding agreement covering at least the following items:

- Schedule for project implementation.
- Financial management of program funds and required matching funds.
- Compliance with related federal regulations.
- Appropriate long-term affordability/access requirements.
- Schedules for project compliance documentation.
- Repayment requirements for noncompliance.

The funding agreement provides a basis for assessing the development and tracking implementation of funded activities. Provisions of the agreement serve as a benchmark that is reviewed for compliance. Appropriate remedial actions are taken and evaluated in a timely manner. Compliance with the terms of the agreement is required prior to approving any request for funding.

On-Site Visitation - Within each program year, Plymouth HRA staff consults with representatives from each community organization receiving a CDBG funding allocation. This visit includes an in-depth review of project procedures and other regulations and reporting requirements, including those pertaining to HUD. Periodically thereafter, staff may schedule an on-site monitoring to review program operation and ensure file compliance. The frequency and depth of those visits depends upon the perceived risk involved with each project.

Document Review - The documents submitted with reimbursement requests are reviewed for completeness and accuracy. When a problem is discovered, HRA staff discusses the issue(s) with project staff to correct the situation and ensure the problem is understood. Reimbursement does not occur until all requirements are met. If subsequent problems are encountered, the project receives a "high-risk" status, and more frequent on-site monitoring is required.

Performance Report - The completion of the Consolidated Annual Performance Evaluation Report (CAPER) is used to ensure program/project completion. If a significant discrepancy between goals and

performance is found, additional consultation occurs. A lack of progress in meeting indicated goals may harm the applicant's chances for future funding if they are unable to comply with regulations.

Timeliness - Timeliness is a requirement of the monitoring process. All applications require a schedule for the expenditure of funds. If a project is found to be falling behind on expenditures, they are contacted regarding the problem to develop an adjusted timeline.

Evaluation - Continued evaluation of the monitoring process for the City of Plymouth is performed to ensure project/program compliance.

Citizen Participation Plan 91.105(d); 91.115(d)

Describe the efforts to provide citizens with reasonable notice and an opportunity to comment on performance reports.

The Plymouth Housing and Redevelopment Authority (HRA) will hold a public hearing on the 2019 CAPER on August 27, 2020 at 7:00pm. The HRA Board of Commissioners will consider comments made prior to and during this meeting when formulating their recommendations for the Plymouth City Council meeting schedule for September 8, 2020. Notice of the public hearing was posted in the local newspaper on August 13, 2020, and a draft copy of this plan will be made available for review on that date. Written comments will be accepted from August 13, 2020 through August 27, 2020 at 4:30pm. A copy of all written comments will be included as an attachment to the submission of this CAPER.

Hennepin County also holds a public hearing on behalf of the County Consortium. This report will be submitted to Hennepin County prior to the comment period for the Consortium CAPER.

Finally and in addition to this CAPER, the following reports are available to the public and have been previously submitted to HUD at this point:

- 2015-2019 Hennepin County Consortium Consolidated Plan
- 2019 City of Plymouth Annual Action Plan
- Regional Analysis of Impediments to Fair Housing (February 2015)
- Revised Regional Analysis of Impediments to Fair Housing (May 2017)

CR-45 - CDBG 91.520(c)

Specify the nature of, and reasons for, any changes in the jurisdiction's program objectives and indications of how the jurisdiction would change its programs as a result of its experiences.

The City of Plymouth has used the resources made available to assist homeowners in a variety of ways throughout the program year. Plymouth staff continually monitors and keeps in close contact with sub-grantees to ensure all stated Action Plan goals are met. In addition, staff conducts outreach with new potential sub-grantees throughout the year to ensure that presently unmet goals are accounted for in annual and long-term planning.

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

No