

**2014 ANNUAL ACTION PLAN  
FOR HOUSING AND COMMUNITY DEVELOPMENT  
CITY OF JACKSONVILLE, ARKANSAS**



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# **I. EXECUTIVE SUMMARY**

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## **A. INTRODUCTION**

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In 1994, the U.S. Department of Housing and Urban Development (HUD) issued new rules consolidating the planning, application, reporting and citizen participation processes for four formula grant programs: Community Development Block Grants (CDBG), Home Investment Partnerships (HOME), Emergency Solutions Grants (ESG) and Housing Opportunities for Persons with AIDS (HOPWA). The new single-planning process was intended to more comprehensively fulfill three basic goals: to provide decent housing, to provide a suitable living environment and to expand economic opportunities. It was termed the *Consolidated Plan for Housing and Community Development*.

According to HUD, the Consolidated Plan is designed to be a collaborative process whereby a community establishes a unified vision for housing and community development actions. It offers entitlements the opportunity to shape these housing and community development programs into effective, coordinated neighborhood and community development strategies. It also allows for strategic planning and citizen participation to occur in a comprehensive context, thereby reducing duplication of effort.

As the lead agency for the Consolidated Plan, the Community Development Department (CDD) hereby follows HUD's guidelines for citizen and community involvement. Furthermore, it is responsible for overseeing the citizen participation requirements that accompany the Consolidated Plan and the Community Development Block Grant (CDBG).

### **PURPOSE OF THE ANNUAL ACTION PLAN**

The *2014 Jacksonville Annual Action Plan for Housing and Community Development* is the one-year planning document identifying the needs and respective resource investments in addressing the city's housing, homeless, non-homeless special needs populations, community development and economic development needs.

### **GOALS OF THE CONSOLIDATED PLAN**

The goals of the Community Development Department are to provide decent housing, a suitable living environment and expanded economic opportunities for the city's low-and moderate-income residents. The CDD strives to accomplish these goals by maximizing and effectively utilizing all available funding resources to conduct housing and community development activities that will serve the economically disadvantaged

residents of the city. By addressing need and creating opportunity at the individual and neighborhood levels, the CDD hopes to improve the quality of life for all residents of Jacksonville. These goals are further explained as follows:

- *Providing decent housing* means helping homeless persons obtain appropriate housing and assisting those at risk of homelessness; preserving the affordable housing stock; increasing availability of permanent housing that is affordable to low- and moderate-income persons without discrimination; and increasing the supply of supportive housing.
- *Providing a suitable living environment* entails improving the safety and livability of neighborhoods; increasing access to quality facilities and services; and reducing the isolation of income groups within an area through de-concentration of low-income housing opportunities.
- *Expanding economic opportunities* involves creating jobs that are accessible to low- and moderate-income persons; making mortgage financing available for low- and moderate-income persons at reasonable rates; providing access to credit for development activities that promote long-term economic and social viability of the community; and empowering low-income persons to achieve self-sufficiency to reduce generational poverty in federally-assisted and public housing.

## **B. CITIZEN PARTICIPATION SUMMARY**

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The City conducted five (5) public hearings to obtain citizens' views and to respond to proposals and questions. Information about the time, location and subject of each hearing was provided to citizens in advance through adopted public notice and outreach procedures such as the local newspapers and the city's marquee. Every effort was made to ensure the public hearings were inclusive. Hearings were held at convenient times and locations and in places where people most affected by proposed activities could attend.

The Director of Community Development will publish notice of the Annual Action Plan for Public Review in a manner that affords citizens, public agencies and other interested parties a reasonable opportunity to examine its contents and submit comments. It will include a list of the locations where copies of the Annual Action Plan may be examined.

The City of Jacksonville's Community Development Department, as lead agency, will receive comments from citizens on its Draft Plan for a period not less than thirty (30) days prior to submission of the Annual Action Plans to HUD. All comments or views of

citizens received in writing during the thirty (30) day comment period will be considered in preparing the final Annual Action Plan.

To the extent allowed by law, interested citizens and organizations shall be afforded reasonable and timely access to records covering the preparation of the Annual Action Plan, project evaluation and selection, HUD's comments on the Plan and annual performance reports. In addition, materials on formula grant programs covered by the Annual Action Plan, including activities undertaken in the previous five (5) years, will be made available to any member of the public who request information from the Community Development Department.

### **C. 2014 ANNUAL ACTION PLAN SUMMARY**

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The City of Jacksonville is required by the U.S. Department of Housing and Urban Development (HUD) to prepare a Consolidated Plan for Housing and Community Development every five years and an Annual Action Plan for Housing and Community Development each year. Timely completion of the Plan in a HUD-acceptable format helps ensure continued funding of housing and community development activities throughout the city. In 2010, the City of Jacksonville prepared its Five-Year Consolidated Plan, covering the program years 2011 – 2015. The City's 2011 – 2015 Consolidated Plan contains a housing market analysis, a housing homeless needs assessment, a community development needs assessment, and the five-year strategic plan, and any other key components that will guide use of the city's CDBG resources for the next five years.

The following represents the 2014 Annual Action Plan for allocating the city's Community Development Block Grant Funds to address housing and community development needs. In order to make the document more informative for citizens and more useful for policy makers, the document describes actions and activities to be undertaken with these resources.

## **II. ANNUAL ACTION PLAN DEVELOPMENT PROCESS**

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### **A. LEAD AGENCY**

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As the lead agency for the Consolidated Plan, the Jacksonville Community Development Department (CDD) followed the federal guidelines about public involvement, evaluation of quantitative and qualitative data, needs assessment, strategy development, priority setting, and the formulation of objectives. The Consolidated Plan for 2011 – 2015 was prepared in accordance with CFR Sections 91.100 through 91.230 of HUD's Consolidated Plan regulations, applicable to entitlement jurisdictions.

The CDD is responsible for overseeing these citizen participation requirements for the Community Development Block Grant (CDBG). Consequently, the CDD strongly encourages public participation and consultation with other organizations as an essential means of identifying community needs. The citizen participation process was formulated at the beginning of the five-year plan development process and is presented in the Citizen Participation Plan (CPP), Appendix A of this document.

The objectives of the CPP are to ensure that the citizens of Jacksonville, particularly persons of low- and moderate-income, persons living in slum and blight areas, units of local government, public housing agencies, and other interested parties, are provided with the opportunity to participate in the planning and preparation of the Consolidated Plan, including amendments to the Consolidated Plan and the Annual Performance Report.

### **B. AGENCY CONSULTATION ACTIVITIES**

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As part of the consolidated planning process, the lead agency, the CDD, must consult with a wide variety of organizations in order to gain understanding of the housing and community development stage. This represents a collective effort from a broad array of entities in Jacksonville, ranging from advocacy groups for the disabled to economic development organizations, and city leaders. Private, non-profit and public organizations, including persons interested in the CDBG program and persons associated with Continuum of Care organizations were contacted through several means, such as, e-mail correspondence, telephone calls and face-to-face interactions. These persons were solicited to discuss housing and community development needs in Jacksonville, including the ranking of those needs and activities that the CDD might consider in better addressing needs throughout the city. Further, individuals were asked to provide additional insight into prospective barriers and constraints to addressing housing and community development needs in Jacksonville.

### **C. EFFORTS TO ENHANCE CITIZEN INVOLVEMENT**

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The draft report for public review was announced to the public on October 1, 2010, which initiated a 30-day public review period.

A public input meeting was held on August 31, 2010 at the Jacksonville Community Center to offer the public an additional opportunity to offer feedback on the Consolidated Plan. These meetings were advertised in the newspaper and interested persons and agencies were notified by email and press releases and display ads aided in the public relations campaign.

A public review meeting was also held in the Jacksonville Community Center on October 14, 2010 at 1:30 PM.

### **D. ACTIONS TAKEN TO ENHANCE THE INSTITUTIONAL STRUCTURE AND ITS COMMUNICATION**

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The City of Jacksonville will meet its responsibility to provide decent and affordable housing and will aid in the development of viable communities with suitable living environments and expanded economic and community development opportunities. It has a lead role in housing-related planning by virtue of its responsibility for coordination and developing the City's Consolidated Plan. This is done with the help and support of a network of public institutions, nonprofit organizations, and private industries. The CDD takes additional initiative in instilling capacity and strong housing and community development through funding initiatives, outreach and training, and other capability building endeavors.

By meeting with non-profit service providers, faith-based organizations, the Jacksonville Public Housing Authority, other government entities, and community organizations, the City of Jacksonville ensures that the needs of the community are addressed. For example, an ongoing dialog with the Sunny Side Addition and Henry Estates Associations, two formally recognized low- to moderate-income neighborhood



associations, provides input for developing, implementing, and monitoring the Consolidated Plan initiatives.

The Jacksonville Public Housing Authority administers the City's Public Housing and rental certification/voucher program for Jacksonville's low-income residents. The PHA is the City's foundation in rental support to low-income persons. Its role, limited only by a confined number of units, is significant, particularly in light of overwhelming growing needs among groups requiring PHA assistance. The PHA monitors public housing, thus ensuring the conditions of housing stock being made available to residents meets Section 8 Housing Quality Standards. Additional long-term housing for otherwise homeless families is provided by the Jacksonville Towers, Worley's Place and Willow Bend apartments. Although the number of units they provide is limited, they are an extension of the network of resources available to residents of Jacksonville.

The Jacksonville Care Channel, a volunteer organization serving the homeless in Jacksonville, assumes a large role in planning and administering services for the homeless and created a large network throughout the Greater Little Rock area to refer homeless individuals in need of long term shelter. Its traditional role in assisting the needy with food, clothing, home furnishings, medicine, school uniforms, and limited emergency financial assistance remains a primary source of support for an increasing number of families and individuals in the city. The Care Channel depends on charitable contributions, mostly by areas churches, fundraisers, CDBG funding, and volunteer workers.

Additionally, Jacksonville works closely with many state and county agencies, such as the Department of Health, Arkansas Department of Human Services, Office of Alcohol and Drug Abuse Prevention (OADAP) and the Arkansas Coalition Against Domestic Violence to provide citizens with programs that address varied needs. The Department of Human Services provides many important services to residents such as programs to aid the elderly population, and programs for individuals with disabilities

Private industry participation in housing and community development activities include the construction of new multi-family developments, lenders that services loans for first time home buyers, home repair contractors, and other companies with a stake in the future of the city. These companies work with non-profit organizations working in community development efforts, providing construction and financing expertise needed for completion of the projects. Local companies have also worked with non-profit agencies through donations of time and money, all of which the CDD communicates with periodically.

The CDD serves as a conduit to enable for-profit and faith-based organizations to stay abreast of the training and conferences being offered that will enhance the delivery of their services. The City will continue to strengthen existing relationships and build new relationships with private and public organizations, social service agencies, neighborhood associations, and the faith-based community, as well as attend meetings of other organizations promoting community development.

### III. ALLOCATING HOUSING AND COMMUNITY DEVELOPMENT RESOURCES

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#### A. OVERVIEW OF AVAILABLE RESOURCES

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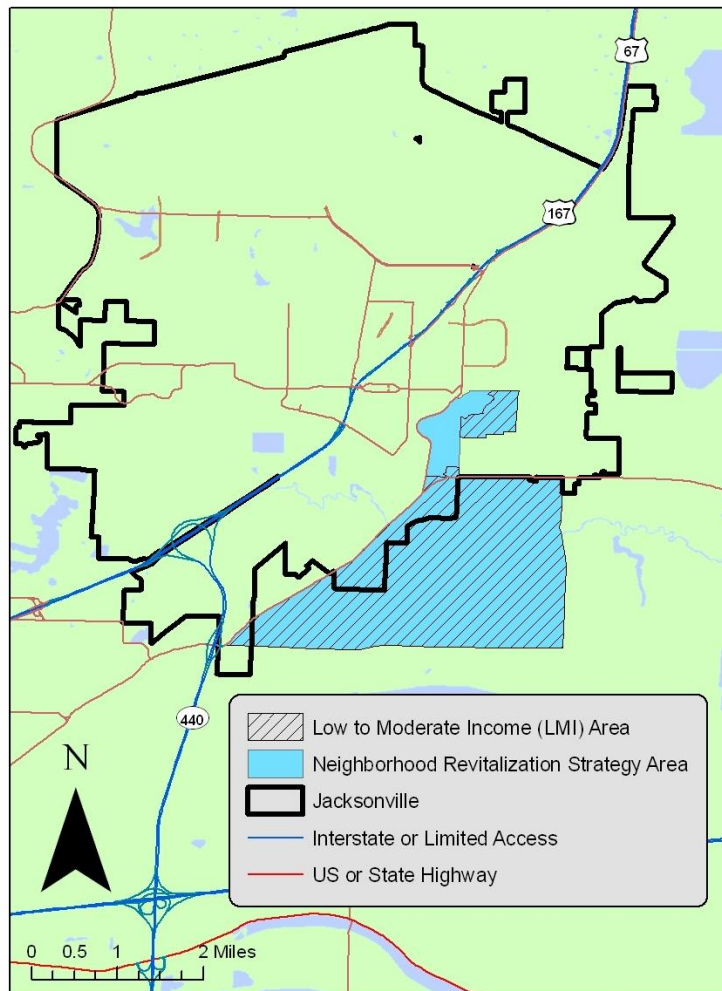
Housing and community development resources are expected to be available to the city of Jacksonville through the US Department of Housing and Urban Development (HUD) under the Community Development Block Grant (CDBG) program.

#### B. GEOGRAPHIC DISTRIBUTION OF HUD RESOURCES

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Formula grant funds from the CDBG program may be directed to their highest and best use first, within each set of program guidelines, given the funding of all housing and community development programs throughout Jacksonville. Map III.1, below, displays the cities low- to moderate-income tracts and designated neighborhood revitalization area.

III.1  
Jacksonville LMI and Neighborhood Revitalization



Jacksonville's Sunny Side Hills neighborhood contains the city's greatest density of low- to moderate-income (LMI) households. The CDD's past use of CDBG funds includes cohesive, street by street, and self-sustaining improvements to the Sunny Side Hills neighborhood, to address the needs of LMI households residing in this area. The CDD believes that the implementation of a comprehensive neighborhood revitalization strategy will result in reinvestment in the economic infrastructure, job creation, and preservation of affordable housing units, all of which will improve the quality of life for LMI households. The combined approach for economic and community development helps ensure sustained growth for the City of Jacksonville.

Additionally, the City acquired property within the Meadows subdivision on the North Side of Cloverdale Road to add additional affordable housing to the City's housing stock.

### **C. ANTICIPATED USE OF RESOURCES IN 2014**

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The CDD continue to address a set of housing and community development demands on housing and community development resources over the remaining years of the five year plan, including several in the current 2014 Annual Action Plan.

Jacksonville will allocate CDBG funds to continue the revitalization of the Sunny Side Hill Neighborhood. The Sunny Side Hill Neighborhood revitalization is the City's number one priority, and many CDBG funds will be allocated to this area. This neighborhood qualifies as an NRSA with more than 51% low- to moderately low-income households, according to the 2010 census.

The revitalization of the NRSA is expected to result in increased knowledge of small business operations, increased homeownership, improved physical environment, increased public safety, an expanded economic base (including property/sales tax and disposable income), a reduction in the percentage of vacant residential units, and rehabilitated residential and commercial properties.

Jacksonville has standing commitments to two non-profits organizations. The Jacksonville Care Channel is the primary resource for homeless individuals seeking help. It has created a large network of resources in and around Jacksonville to aid the homeless population. The Fishnet Mission is most known for providing food to the needy as well as the homeless and elderly but they also participate in other community endeavors such as, writing letters to prisoners, visiting the sick, and handing out Christmas stockings to children. The City has agreed to continue its transportation

program for the elderly; the program will receive \$14,400 this year based on the allocated grant amount of \$208,089.00.

Jacksonville Our Club is an afterschool/summer program for youth ages 6-18 currently with twenty-two students enrolled in the program. The program primary focus is educational/cultural enrichment, life skills, health and fitness and community service. They will be funded in 2014 to provide opportunities for the students to experience activities/events they might not have the opportunity otherwise. Activities will include but not be limited to the Arkansas Repertory Theater, Arkansas Symphony Orchestra, Mid-America Museum, Agricultural Museum and conferences.

#### **D. OBSTACLES IN MEETING UNDERSERVED NEEDS**

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Resources available in addressing the housing and community development needs in Jacksonville are insufficient; needs dwarf available resources. Jacksonville has many high-poverty, low-employment areas. Additionally, there is a strong need for public infrastructure improvement and economic development throughout the city.

**Community Development Department  
CDBG Budget for 2014**

**CDBG Grant/Expenditures for 2014: \$208,089.00**

I.	Rehab		\$ 121,289.00
	a.	Rehab	\$108,289.00
	b.	Sewer	\$ 8,000.00
	c.	Emergency/Handicap	\$ 5,000.00
II.	Community Development		\$ 2,000.00
	a.	Neighborhood Revitalization	\$ 2,000.00
II.	Public Service		\$ 28,600.00
	a.	Elderly Transportation Program	\$ 14,400.00
	b.	Jacksonville Care Channel	\$ 8,000.00
	c.	Fishnet	\$ 3,000.00
	d.	Jacksonville Our Club	\$ 2,000.00
	e.	Back-to-school backpacks	\$ 1,200.00
IV.	Public Improvements	- Galloway Park Parking area	\$ 15,400.00
V.	Administration		\$ 40,800.00

## **IV. HOUSING AND COMMUNITY DEVELOPMENT STRATEGIES**

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### **A. 2011-2015 HOUSING AND COMMUNITY DEVELOPMENT PLAN SUMMARY**

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The following list presents the overriding objectives and strategies of the City of Jacksonville, Arkansas, for its Five-Year Consolidated Plan for Housing and Community Development, including selected performance criteria associated with each strategy and goal. Investment strategies will emphasize benefits to the City's low- to moderate-income areas as well as the Neighborhood Revitalization Strategy Area (NRSA).

#### **FIVE-YEAR HOUSING AND COMMUNITY DEVELOPMENT OBJECTIVES AND STRATEGIES**

The objectives the City will pursue over the next five years are as follows:

1. Reduce housing blight and blighting influences
2. Create, expand and retain jobs
3. Enhance provision of additional public facilities and services

#### **OBJECTIVE ONE: REDUCE HOUSING BLIGHT AND BLIGHTING INFLUENCES**

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Statistics suggested the population in Jacksonville has been rising modestly over the last decade and a need to examine the existing affordable housing stock was present. However, the 2010 census show a decrease in population for Jacksonville.

#### **STRATEGIES:**

##### **Rehabilitate Suitable Homeowner Properties**

Rehabilitation of existing homeowner properties is an important part of the overall improvement of Jacksonville's neighborhoods. Rehabilitation will enhance property values and reduce the number of unsuitable or dilapidated homes.

The City will establish criteria that define housing that is economically feasible and suitable for rehabilitation as well as housing that is not suitable for rehabilitation. This process will help ensure that Jacksonville can more effectively utilize its housing resources and make incremental improvements focusing on the exterior appearance of a property and significant health and safety deficiencies in the interior of a property. Examples of these standards include:

1. Housing that is suitable for rehabilitation was constructed with higher-quality materials and workmanship and has architectural, historic or aesthetic value.
2. Housing that is not suitable for rehabilitation was constructed with inferior or lower-quality materials and workmanship and has no architectural, historic or aesthetic value.

The City will target rehabilitation efforts in selected areas of the city, so that neighborhood improvements can be more readily reflected in the area's surrounding homes and neighborhoods.

### **Reduce Blighted Housing**

A blighted area is defined as one in which conditions place serious physical or economic burdens on a community which cannot reasonably be expected to be reversed or alleviated by private enterprise acting alone. Blighted areas may be detrimental to the public health, safety or welfare of the community and they may be detrimental to the effective redevelopment of the area. A combination of many factors seems to have left Jacksonville with a burdensome amount of blighted and dilapidated housing. By reducing blight through the following actions the City will revitalize deteriorated neighborhoods and reduce low-income concentrations:

1. The City will seek to identify housing that is unsuitable for rehabilitation and initiate efforts to acquire and eliminate such housing, whether through acquisition, condemnation or other means. Jacksonville will attempt to demolish 150 homes and build 50 new homes over the five-year planning period.
2. Once the housing is eliminated, the City will identify private residential owners interested in acquiring the land, expanding selected lot sizes in the city or using the lots for infill housing.

### **Promote New Construction for Infill Replacement of Housing**

Because Jacksonville's population is expanding slowly, there remains a need to provide affordable new construction for homeownership. The new construction needs to be handled in a thoughtful manner that takes into consideration the issues of the entire community. Given these considerations, infill opportunities, including the redevelopment of residential properties, should be targeted as follows:

1. Identify possible infill projects
2. Review and, budget permitting, fund appropriate infill projects

### **PERFORMANCE MEASUREMENT CRITERIA**

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#### **Provide Decent Housing:**

*Availability/Accessibility:* the number of eligible households that benefit from rehab

*Affordability:* the number of housing units that have been rehabilitated

*Affordability:* the number of housing units created through infill replacement



*Sustainability:* the number of housing units that have been rehabbed or demolished

## **OBJECTIVE TWO: CREATE, EXPAND AND RETAIN EMPLOYMENT IN JACKSONVILLE**

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The City of Jacksonville has an abundant, capable workforce that has unfortunately experienced substantive job losses in the last couple of years. This recent problem can be overcome in part by focusing on the strengths of the workforce, attracting new business to the city, and supporting and expanding current business in the city. Such actions may include teaming with economic development partners or leveraging CDBG resources with others, thereby utilizing a team approach.

### **STRATEGIES:**

#### **Expand and Retain Employment at Existing Businesses**

The City will take action by providing working capital, technical assistance, assistance with locating local employees and/or aiding with special skills training.

#### **Recruit New Businesses**

The City will seek new business by targeting employers with needs matching the abilities of the city's workforce.

## **PERFORMANCE MEASUREMENT CRITERIA**

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### **Expand Economic Opportunities:**

*Sustainability:* the number of retained or new jobs created at existing businesses

*Sustainability:* the number of jobs created by recruiting new business to the city

*Sustainability:* the number of persons retrained

*Availability/Accessibility:* the number of eligible individuals acquiring jobs, having their jobs retained

## **OBJECTIVE THREE: PROVISION OF ADDITIONAL COMMUNITY FACILITIES AND PUBLIC SERVICES**

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Jacksonville has an ongoing need for enhancing existing and providing additional community facilities and public services. This need goes hand-in-hand with the city's slowly rising population and the desire to enhance the city's well-being, the vibrancy of its neighborhoods, and the overall attractiveness of the community

### **STRATEGIES:**

#### **Create Additional Community Facilities**

The City will take action to enhance existing facilities and create additional community facilities, particularly targeted to the city's youth, thereby increasing the vitality of the city's neighborhoods and increasing the attractiveness of the city.

### **Provide Transportation Services to the Elderly**

The City will seek to provide enhancements to the existing service network so that elderly residents can obtain the public services needed to commute to necessary destinations within the community.

## **PERFORMANCE MEASUREMENT CRITERIA**

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### **Additional or Enhanced Community Facilities and Public Services:**

*Sustainability:* the number of new or enhanced community facilities

*Sustainability:* the number of persons served by facilities or transportation services

*Availability/Accessibility:* the number of eligible individuals using the new or enhanced facilities or transportation services

## **B. ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING**

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The City of Jacksonville is required to submit to HUD certification that it is affirmatively furthering fair housing. This certification has three elements, which require the city to:

1. Complete an analysis of impediments to fair housing choice (AI)
2. Take actions to overcome the effects of any impediments identified through the analysis
3. Maintain records reflecting the analysis and actions taken

The Jacksonville Community Development Department is the lead agency for HUD housing and community development for the City of Jacksonville and is therefore the agency responsible for conducting the AI.

HUD defines impediments to fair housing choice in terms of their applicability to federal law as:

- Any actions, omissions, or decisions **taken because of** race, color, religion, sex, disability, familial status, or national origin, which restrict housing choices or the availability of housing choice. These classes are considered the protected classes or **basis**.
- Any actions, omissions, or decisions which **have the effect of** restricting housing choices or the availability of housing choice on the basis of race, color, religion, sex, disability, familial status, or national origin.

The AI is a thorough examination of a variety of sources related to housing, affirmatively furthering fair housing, the fair housing delivery system, and housing transactions affecting

people who are protected under fair housing law. AI sources include census and home mortgage industry data, surveys of housing industry experts and stakeholders, and public fair housing forums.

This AI was created through an active and involved public input and review process, via direct contact with stake holders, mass distribution of announcements about opportunities for public involvement, public forums to collect input from citizens, distribution of draft reports for citizen review, and a formal presentation of findings. The CDD continually availed itself to receive perspective, commentary, and input from all walks of life and citizens throughout Jacksonville.

### **IMPEDIMENTS TO FAIR HOUSING CHOICE**

The 2010 Analysis of Impediments for the City of Jacksonville uncovered several issues that can be considered barriers to affirmatively furthering fair housing and, consequently, impediments to fair housing choice. These issues are as follows:

1. Historically, insufficient system capacity has resulted in:
  - A. Inadequate outreach and education efforts that have led to:
    - i. Insufficient community awareness of fair housing;
    - ii. Insufficient understanding of what constitutes affirmatively furthering fair housing; and
    - iii. Inadequate understanding of the complaint process;
  - B. Ineffective processing and resolution of fair housing complaints.
2. Rental markets in the city appear to demonstrate discriminatory actions by housing providers including:
  - A. Failure to make reasonable accommodation or modification,
  - B. Discriminatory terms, conditions, privileges, services and facilities.
3. Disproportionately high home purchase loan denial rates exist for selected racial and ethnic minorities.
4. Home purchase loan denial rates are disproportionately high in lower-income areas.
5. Current land-use and development practices may not be in the spirit of affirmatively furthering fair housing.

### **SUGGESTED ACTIONS TO CONSIDER**

In response to these listed impediments, the City of Jacksonville will consider taking the following actions:

1. Consider continuing participating in the Arkansas Community Development Association for efficient use of fair housing resources.
  - A. Contribute resources to central pool to assist with funding fair housing activities.
  - B. Consider additional partners to include in the Association.
2. Increase knowledge and understanding of fair housing and affirmatively furthering fair housing through the following outreach and education efforts:

- A. Offer meeting space and set up educational schedule for both consumers and providers of housing to be carried out by the Arkansas Fair Housing Commission (AFHC),
    - i. Assist in coordinating local delivery of educational services by the AFHC to local renters,
    - ii. Assist in coordinating local delivery of professional training services by AFHC to landlords, program managers, other rental housing providers,
  - B. Prominently display AFHC posters, flyers, and fair housing educational printed materials,
  - C. Distribute printed materials from the AFHC that present information regarding:
    - i. Definitions of reasonable accommodation and modification,
    - ii. Examples of discriminatory terms and conditions in rental markets,
    - iii. Differences between affirmatively furthering fair housing, affordable housing production and preservation, and landlord/tenant rights and responsibilities,
  - D. Create improved referral system by distributing information about AFHC including how to file a complaint,
  - E. Create fair housing outreach e-mail distribution list for fair housing materials that might be distributed quarterly to all those who may be interested in fair housing,
  - F. Request that the AFHC establish a Fair Housing Hotline for individuals to contact the AFHC and obtain immediate response to fair housing questions or concerns,
  - H. Request technical support from the state's Little Rock HUD office for outreach and education activities to be targeted to racial and ethnic minority housing consumers.
3. Establish baseline of the actual level and types of discrimination occurring in the community through audit testing activities,
    - A. Ask the AFHC to conduct, or conduct separately, a small sample of fair housing audit tests and record findings; this will again be done in five years to compare results,
      - i. For the City of Jacksonville, this is to include race and disability testing,
    - B. Request that the AFHC track complaint data more closely and use complaint data to compare year to year changes in fair housing activities,
      - i. While more complaints are likely to be filed if educational efforts are successful, the goal of this action is to decrease the *percentage* of complaints that are found to be without cause and increase the percentage of those that are amicably reconciled. An additional goal is the decrease of the number of persons who abandon the complaint process.
  4. Coordinate renter, homebuyer and homeowner credit trainings with local bankers and Realtors,
    - A. Enhance understanding of credit, what leads to poor credit and the attributes of predatory lending,
    - B. Enhance the understanding of poor real estate business practices, such as steering, redlining, and blockbusting.
  5. Review prospective degree of exclusionary zoning and land use policies that may exist in the City,
    - A. Consider how more inclusionary land-use policies might work for the City and how they may be implemented,
    - B. Consider how to extend affordable housing production/preservation activities to additional areas of the city.

6. Form local fair housing workgroup to meet periodically and address fair housing issues in the city. This group should be comprised of interested parties such as bankers, Realtors, property managers, fair housing advocates and representatives of the City.
  - A. Create and maintain database of contact information for this group and establish fair housing outreach e-mail distribution list.

### **C. BARRIERS TO AFFORDABLE HOUSING**

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Currently, there are numerous barriers to affordable housing within Jacksonville, which include:

- Population growth;
- Lack of available funding, including competition for tax credits within the state;
- Elevated land prices;
- Lack of available land;
- Inflated housing market;
- Increasing cost of building materials;
- Unwillingness of developers to construct affordable housing due to profit reasons;
- Credit problems for housing buyers, i.e. bankruptcies, high debt-to-income ratio;
- Down payment and closing costs expenses associated with purchasing a home.

The 2010 Housing and Community Development Needs Survey was conducted as part of the process of evaluating housing needs in Jacksonville. The survey provided respondents with a list of a number of possible barriers to affordable housing and asked participants to select any barriers that they felt existed in Jacksonville. A total of 80 responses were received from stakeholders throughout the city. The results are presented in Table IV.1, on the next page.

Thirty-six people believe that lack of available and/or affordable land is a barrier to affordable housing. Other frequently sighted barriers to affordable housing include the cost of land, the condition of rental housing, the cost of labor, the cost of materials, construction fees, and NIMBYism.

Many of the barriers noted refer to the costs associated with building additional housing units. Labor, materials, construction fees, land, and permitting fees all affect the amount of affordable housing constructed. High building costs and fees decrease the amount of affordable housing available by limiting new construction.

**Table IV.1  
Barriers or Constraints to  
Affordable Housing**

City of Jacksonville  
2010 Housing and Community Development Survey

<b>Barriers</b>	<b>Observations</b>
Lack of available and/or affordable land	36
Cost of land or lot	33
Condition of rental housing	33
Cost of labor	31
Cost of materials	28
Construction fees	20
NIMBYism (Not In My Back Yard)	19
Lack of nearby services	16
Lack of housing quality standards	14
Lack of qualified builders	12
Lot size	12
Permitting fees	11
Lack of qualified contractors	10
Lack of other infrastructure	8
Permitting process	7
Density	6
Impact fees	5
Lack of water/sewer systems	4
Other building codes	3
Other zoning	2
Energy codes	2
<b>Total</b>	<b>312</b>

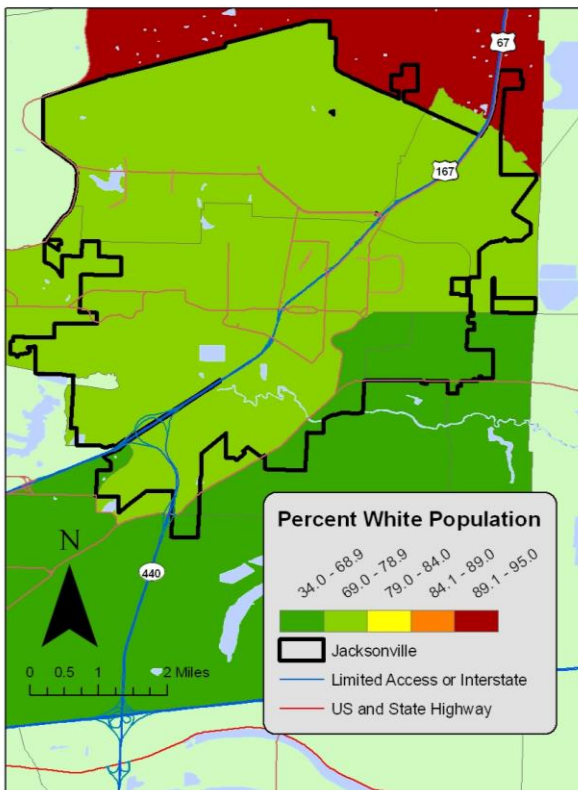
## **D. MINORITY CONCENTRATIONS**

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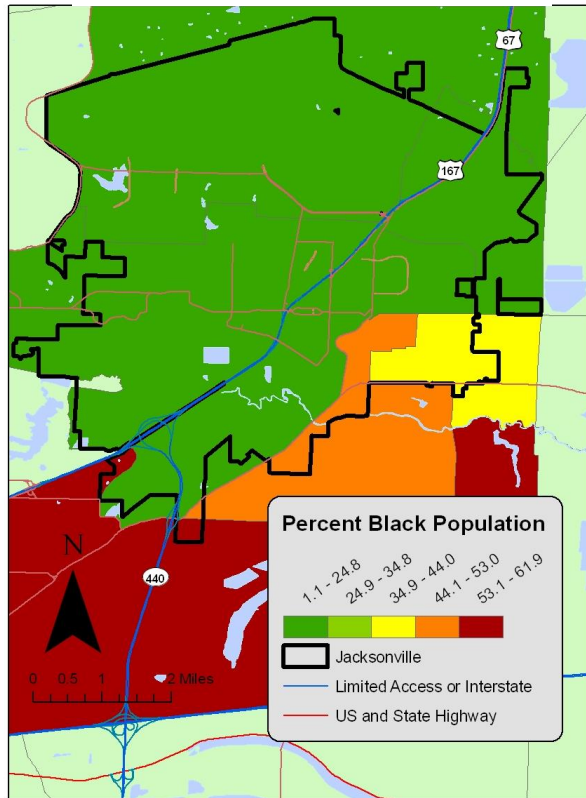
While current information about detailed geographic distribution of population by race or ethnicity is not readily available, data from the 2000 census revealed that the geographic distribution of these racial and ethnic minorities was not even in Jacksonville. An analysis of racial distribution was conducted by calculating the percentage share of total population within each census tract of the particular racial or ethnic group. That share was then plotted on a geographic map. HUD defines a population as having a disproportionate share when a portion of a population is more than 10 percentage points higher than the jurisdiction average.

The following maps illustrate select concentrations through out the city. Map IV.1, below, shows the concentration of the white population in the city. At the time of the 2000 census 68.9 percent of the population in the city was white. Therefore, based on HUD’s definition, any area that had a white population ten percentage points or higher at that time had a disproportionate share of the white population. This map shows that the only census tracts with a disproportionate share of whites were located on the northern border of Jacksonville, shown in red.

**Map IV.1**  
**Percent White Population by**  
**Census Tract**  
 City of Jacksonville  
 2000 Census Data



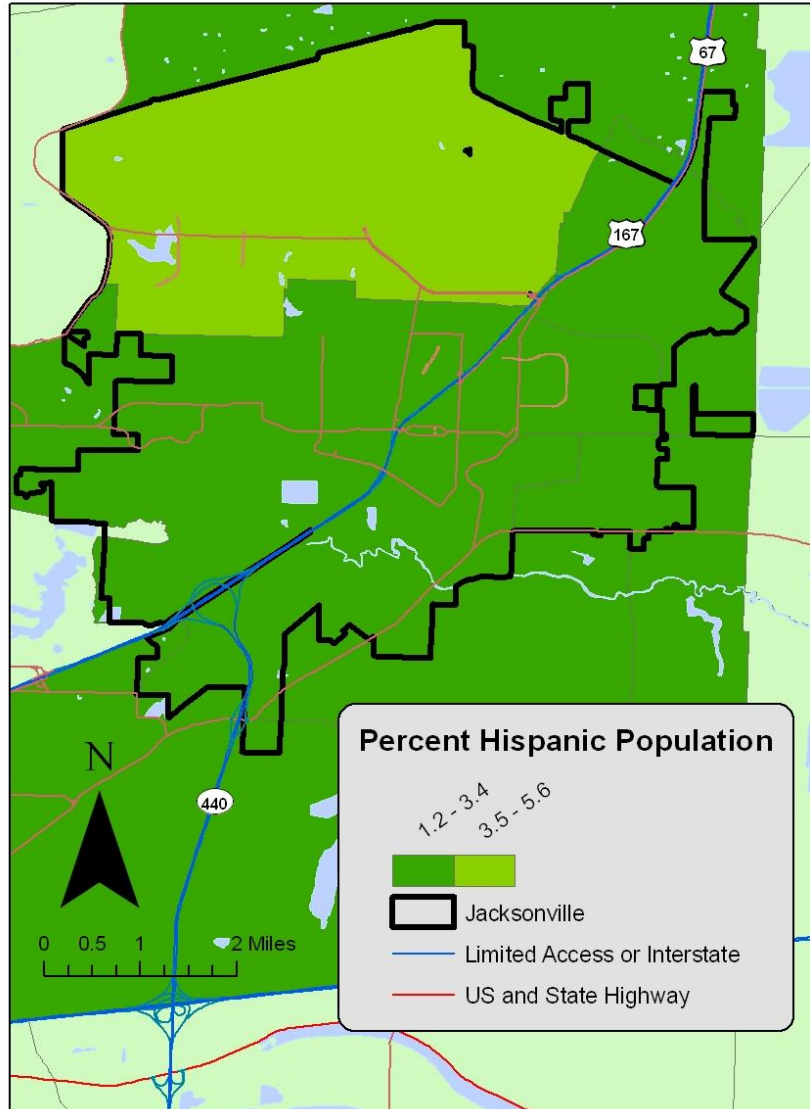
**Map IV.2**  
**Percent Black Population by**  
**Census Tract**  
 City of Jacksonville  
 2000 Census



Map IV.2, above, shows the concentration of the black population in the city by census tract. There were several tracts with a disproportionate share of the black population. These tracts were located in the southeastern portion of the city, shown in red, yellow and orange. Most of this area corresponds with the cities LMI census tracts.

Map IV.3, presents the geographic concentration of another minority population in the city: Hispanic persons. The Hispanic population was evenly spread throughout Jacksonville and there were no areas of disproportionate share greater than 13.4 percent.

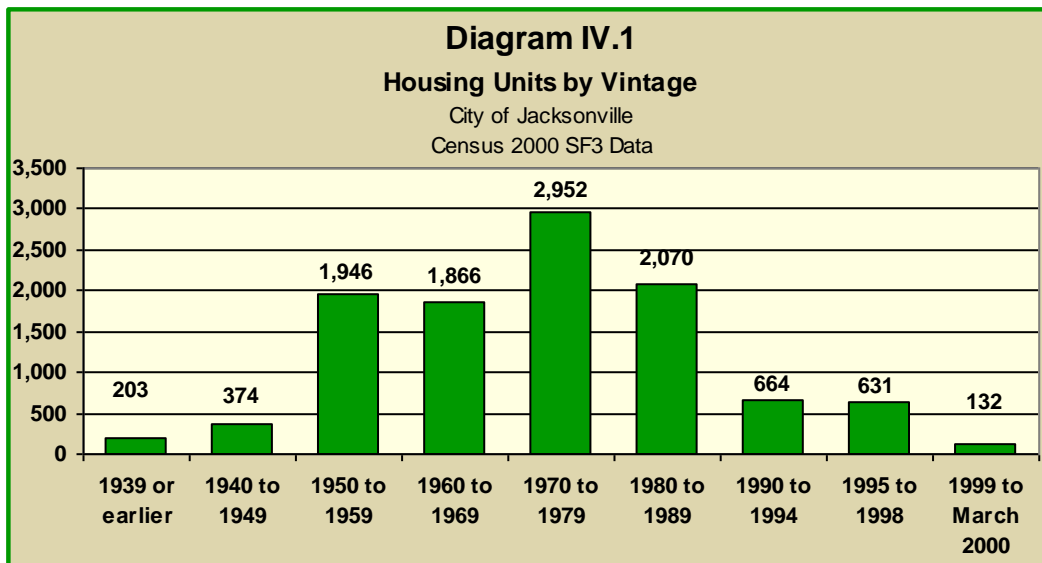
**Map IV.3**  
**Percent Hispanic Population by Census Tract**  
City of Jacksonville  
2000 Census Data





## E. LEAD-BASED PAINT HAZARDS

According to the 2000 census data, homes built before 1980 comprise 67.9 percent of the homes in Jacksonville as seen in Diagram IV.1. Homes built before 1980 are more likely to contain lead-based paint hazards.



HUD's estimates of lead contamination rates for homes built prior to 1980 were applied to the total number of units shown above. Table IV.2, presents the total number of housing units estimated to have lead-based paint risks and shows that a significant number of housing units in the city of Jacksonville were at risk of lead-based paint contamination, a total of 5,026. Most of these homes were renter-occupied rather than owner-occupied.

**Table IV.2**  
**Lead Based Paint Risks to Occupied Housing Units**  
City of Jacksonville  
2000 SF3 Census

Year Built	Units with Lead Based Paint Risk		
	Owner	Renter	Total
1939 or earlier	53	130	183
1940 to 1949	180	119	299
1950 to 1959	413	1,144	1,557
1960 to 1969	528	629	1,157
1970 to 1979	919	911	1,830
<b>Total</b>	<b>2,092</b>	<b>2,934</b>	<b>5,026</b>

Table IV.3 presents 2009 data regarding the number of households at risk of lead-based paint hazards broken down by tenure and also by presence of children for Paulaski County. Owner-occupied households showed 4,586 units with young children at risk of lead-based paint exposure. In total, roughly 9,193 households showed the capacity to pose lead-based paint health risks for children.

<b>Table IV.3</b>			
<b>Households At Risk to Lead Based Paint Hazards by Year Structure Built by Presence of Young Children by Tenure</b>			
Paulaski County 2009 HUD CHAS Data			
<b>Year Built</b>	<b>Have Young Children</b>		
	<b>Yes</b>	<b>No</b>	<b>Total</b>
<b>Owner</b>			
1939-	410	4,554	4,964
1940 to 1959	1,328	11,588	12,916
1960 to 1979	2,849	20,345	23,194
<b>Total</b>	<b>4,586</b>	<b>36,487</b>	<b>41,074</b>
<b>Renter</b>			
1939-	261	2,754	3,015
1940 to 1959	1,320	5,728	7,048
1960 to 1979	3,026	11,290	14,316
<b>Total</b>	<b>4,607</b>	<b>19,772</b>	<b>24,379</b>
<b>Total</b>			
1939-	671	7,308	7,979
1940 to 1959	2,648	17,316	19,964
1960 to 1979	5,875	31,636	37,510
<b>Total</b>	<b>9,193</b>	<b>56,260</b>	<b>65,453</b>

The Jacksonville CDD, in coordination with the City Engineer, oversees lead-based paint abatement efforts in home rehabilitation and construction for low- to moderately low-income properties. The City’s Community Development Director will continue to actively take training classes to stay abreast in the latest guideline for lead-based paint. Annually the City’s Community Development Department surveys local and state health agencies to ensure current lead-abatement efforts are effective.

## F. ANTI-POVERTY STRATEGY

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Poverty is the condition of having insufficient resources or income. In its extreme form, poverty is a lack of basic human needs, such as adequate and healthy food, clothing, housing, water, and health services. Even modest levels of poverty can prevent people from realizing their goals and dreams.

Mere numbers and statistics do not tell the whole story of poverty. In order to fully grasp the nature and extent of poverty in the United States, it is important to understand how the federal government defines this term. Since the 1960s, the U.S. government has measured poverty by relating it to an artificially constructed *poverty line*. At the risk of oversimplifying this term, the *poverty line* is based on the level at which one-third of a family's annual income, adjusted for inflation, is no longer sufficient to afford an adequate diet. However, since that time, food costs have steadily decreased as a percentage of a family's budget, while medical and housing costs have skyrocketed. Thus, the assumption that a family spends an average of one third of its budget on food is no longer an accurate one.

The federal government does not consider families earning more than this level to be living in poverty despite the fact that the wages of these families are not high enough to lift them out of what most of society consider to be poverty. Many of these families are often called the "working poor" since their employment does not guarantee them a "living wage."

The City focuses on reducing poverty through expanding economic opportunities to promote long-term economic and social viability including business start-up loans/grants directed at creating jobs accessible to low-income persons; providing training through a business incubator programs; supporting access to credit counseling to achieve self-sufficiency, particularly for persons in federally assisted and public housing.

The CDD will reduce poverty by fostering and promoting self-sufficiency and independence. To better empower individual and families toward this goal, the following strategies will be put to work:

- Promote sustainable economic development through affordable housing and other community development activities;
- Assist households in purchasing homes, developing stability and net worth and reducing the likelihood for poverty;

- Evaluate projects, in part, on the basis of their ability to foster self-sufficiency when awarding funding for projects;
- Maintain a strong relationship with the Central Arkansas Team Care for Homeless to enhance and promote stabilization of homeless families and encourage transition to stable, permanent housing situations;
- Create and on-going mechanism for participation by residents and businesses in the revitalization of the area;
- Enhance efforts to educate the public and interested persons about available supportive services that foster self-sufficiency and independent living arrangements;
- Encourage job training and placement referral service to low and moderate income residents in the area.

## **G. ANTI-DISPLACEMENT POLICY**

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*Displacement* occurs when a person moves as a direct result of federally-assisted acquisition, demolition, conversion, or rehabilitation activities, because he or she is:

- Required to move, or
- Not offered a decent, safe, sanitary and affordable unit in the project, or
- Treated “unreasonably” as part of a permanent or temporary move.

The term *displaced person* means any person that moves from real property or moves his or her personal property from real property permanently as a direct result of one or more of the following activities:

- Acquisition of or written notice of intent to acquire, or initiation of negotiations to acquire, such real property, in whole or in part, for a project.
- Rehabilitation or demolition of such real property for a project.
- Rehabilitation, demolition, or acquisition (or written notice of intent) of all or a part of other real property on which the person conducts a business or farm operation, for a project.

A person may also be considered displaced if the necessary notices are not given or provided in a timely manner and the person moves for any reason.

When a substantial number of persons will be displaced from their dwellings the CDD shall encourage the residents and community organizations in the displacement area to form a relocation committee. The committee shall include, when applicable, residential owner occupants, residential tenants, business people, and members of existing organizations within the area. Additionally, the CDD will provide suitable housing and finance the costs associated with displacement.

During the relocation planning process the CDD will, at a minimum, guarantee the following:

1. Timely and full access to all documents relevant to the relocation program.
2. The provision of technical assistance necessary to interpret elements of the relocation plan and other pertinent materials.
3. The right to submit written or oral comments and objections.
4. Prompt written response to any written objections or criticisms.

The CDD will comply with the acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended, and implementing regulations at 49 CFR 24; and it has in effect and is following a residential anti-displacement and relocation assistance plan required under section 104(D) of the Housing and Community Development Act of 1974, as amended, in connection with and activity assisted with funding under the CDBG programs.

## **V. ONE YEAR ACTION PLAN**

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### **A. ADMINISTERED CDBG FUNDS**

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Jacksonville has targeted the revitalization of the Sunny Side Hills neighborhood as its number one priority. Currently, the City has assessed the feasibility of land acquisition from property owners as well as determined which properties it will take over due to non-payment of taxes, ordinances and property assessments. Between 25 and 30 properties that have blighted structures will be removed by demolition and the sites cleared for future development. The area in and around Sunny Side Hills contains the City's largest concentration of very low- to low-income residents. Our main objective is to make concentrated, coherent, and self-sustaining improvements, street by street, while still addressing urgent needs of very low- to low-income residents.

The City of Jacksonville has placed Affordable Housing as one of its main goal in improving the quality of life for citizens. The "The Meadows" project is building a 55-unit single family mixed financed/mixed income development. Jacksonville received IKE 2 Disaster Funds to pay for waste water grinder pumps needed for proper drainage on the properties. Funding was awarded in 2011; construction began in August 2012 on the 111 lot subdivision. Fifty-five of the lots will be designated as affordable housing units offering 46-three bedroom and 9-four bedroom single family homes. There will be no visual indicator that the affordable housing is separate in anyway from the rest of the units in the development. As of November1, 2012, nine units were already occupied.

### **B. HOMELESS PREVENTION**

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The Jacksonville Care Channel is Jacksonville's shelter for homeless families in need of temporary shelter. The Care Channel provides short-term shelter by renting motel rooms or suites at a local hotel for a very limited number of nights for those in need. Jacksonville's proximity to the metropolitan city of Little Rock makes referring homeless to larger facilities and programs an efficient and feasible practice. Transportation to more comprehensive and longer term homeless housing, homeless prevention counseling and other homeless services, in Little Rock, is provided by the Jacksonville Care Channel.

Comprehensive services available in the greater area include;

- Youth Emergency Shelter;
- Our House Shelter;
- Starting Point Day Care and Early Learning Center;
- Union Rescue Mission;
- Salvation Army;
- Dorcus House;
- And the Women and Children First Center against Domestic Violence.

The Fishnet Missions is another facility located in Jacksonville that aids the homeless population. They are a faith-based; non-profit that provides food to needy families on Tuesday and Thursday of each week. They also assist needy families and individuals with household items. The City of Jacksonville supports this organization and in the past has provided supplies such as; shelving, computers, sacks for food distribution, office supplies, tables and hand trucks as needed. In June of 2011, Community Development provided a sidewalk in front of the building for more accessibility for their clients and a paved asphalt parking lot for better access to the building.

The Community Development Department, in conjunction with Central Arkansas Team Care for Homeless (CATCH), will also pursue the following goals to address individuals and families with children that are at imminent risk of becoming homeless or those that have become homeless:

- Strengthen services and funding for homeless prevention;
- Increase supply of supportive housing;
- Increase income of homeless people;
- Improve services for homeless people.

Each CoC is required to submit an annual CoC plan and application for funding. The application includes a Housing Gap Analysis Chart, Table 1A, which identifies housing and support service needs for the continuum's homeless and homeless special needs population. Table 1A, provides a summary of the information provided by CATCH. The information is separated into two sections: homeless individuals and people who are homeless in families with children.

As shown in HUD Table 1A, CATCH has a significant shortage of transition housing and especially permanent supportive housing for individuals. Slightly more than 370 transitional housing units and more than 1,000 permanent housing units are needed for individuals, while emergency shelter has less of a project needs, with no gap in units. Forty-three permanent supportive housing units are needed for people in families with

children. There is currently no need for additional emergency shelter or transitional housing for people in families with children.

Additional information is provided in Table 1A concerning six homeless subpopulations: severely mentally ill; chronic substance abuse; veterans; persons with HIV/AIDS; victims of domestic Violence; and, unaccompanied youth under the age of 18.

As shown in Table 1A, the number of people who were sheltered homeless in each subcategory ranged from 222 for persons with chronic substance abuse problems to one person with HIV/AIDS. Because these totals resulted from point-in-time counts, they are likely much lower than the actual number of people in each subcategory.

The Community Development Department will persist in aiding the homeless by continuing to work closely and participating with CATCH. Currently the position of Chair of the Board of Directors is filled by the City's representative. We are committed to attending monthly meetings, conferences, and training sponsored by CATCH, ensuring our commitment to addressing the needs of Jacksonville's homeless population. Although limited in department resources, the Community Development Department is diligent in referring individuals to agencies fully equipped to handle their needs within the surrounding community. The primary objective in addressing homelessness in Jacksonville is to prevent homelessness by removing the potential to become homeless.

On January 24, 2013, CATCH conducted its Point-In-Time Count of the homeless. The count is a requirement of HUD for each CoC. The count consisted of both the sheltered and unsheltered homeless population in the four county areas. Community Development was in charge of getting goodie bags for the count.

January 30, 2014 was designated at the day for the required sheltered count in the CATCH area. As stated above, HUD require a count each year. The odd number year is for both shelter and unsheltered, while the even number year is shelter only.



**Table 1A**  
**City of Jacksonville**  
Homeless and Special Needs Populations  
Continuum of Care: Housing Gap Analysis Chart

		<b>Current Inventory</b>	<b>Under Development</b>	<b>Unmet Need/ Gap</b>
<b>Individuals</b>				
<b>Example</b>	<b>Emergency Shelter</b>	<b>100</b>	<b>40</b>	<b>26</b>
<b>Beds</b>	Emergency Shelter	319		0
	Transitional Housing	380		372
	Permanent Supportive Housing	357		735
	<b>Total</b>	<b>699</b>		<b>1107</b>
<b>Persons in Families with Children</b>				
<b>Beds</b>	Emergency Shelter	89		0
	Transitional Housing	211		0
	Permanent Supportive Housing	303		43
	<b>Total</b>	<b>300</b>		<b>43</b>

**Continuum of Care: Homeless Population and Subpopulations Chart**

<b>Part 1: Homeless Population</b>	<b>Sheltered</b>		<b>Unsheltered</b>	<b>Total</b>	
	<b>Emergency</b>	<b>Transitional</b>			
Number of Families with Children (Family Households):	18	46	2	66	
1. Number of Persons in Families with Children	47	191	8	246	
2. Number of Single Individuals and Persons in Households without children	281	433	444	1158	
<b>(Add Lines Numbered 1 &amp; 2 Total Persons)</b>	<b>328</b>	<b>624</b>	<b>452</b>	<b>1404</b>	
<b>Part 2: Homeless Subpopulations</b>	<b>Sheltered</b>			<b>Total</b>	
a. Chronically Homeless	54			16	70
b. Severely Mentally Ill	45				
c. Chronic Substance Abuse	222				
d. Veterans	83				
e. Persons with HIV/AIDS	1				
f. Victims of Domestic Violence	95				
g. Unaccompanied Youth (Under 18)	21				

## **APPENDIX A – CITIZEN PARTICIPATION PLAN**

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### **Introduction**

In 1994, the U.S. Department of Housing and Urban Development (HUD) issued new rules consolidating the planning, application, reporting and citizen participation processes of four formula grant programs: Community Development Block Grants (CDBG), Home Investment Partnerships (HOME), Emergency Shelter Grants (ESG) and Housing Opportunities for Persons with AIDS (HOPWA). The new single-planning process was intended to more comprehensively fulfill three basic goals: to provide decent housing, to provide a suitable living environment and to expand economic opportunities.

Provision of decent housing may involve assisting homeless persons in obtaining appropriate housing, retaining the affordable housing stock, increasing the availability of permanent affordable housing for low-income households without discrimination, and / or increasing supportive housing to assist persons with special needs. Providing a suitable living environment might entail improving the safety and livability of neighborhoods, including the provision of adequate public facilities; deconcentrating housing opportunities and revitalizing neighborhoods; restoring and preserving natural and physical features with historic, architectural, and aesthetic value; and conserving energy resources. Expanding economic opportunities can involve creation of accessible jobs, providing access resources for community development, and assisting low-income persons to achieve self-sufficiency.

The Consolidated Plan is actually a three-part planning process required by HUD. It comprises developing a five-year strategic plan, preparing annual action plans and submitting annually performance reports. These three parts are intended to furnish the framework whereby the City of Jacksonville can identify its housing, homeless, community, and economic development needs, identify resources that will be tapped and actions to be taken that will address the needs, as well as look back and evaluate the City's progress toward achieving its strategic goals. Completing these documents on time and in a manner that is acceptable to HUD ensures program funding.

The precursor to the Consolidated Plan is the Citizen Participation Plan (CPP). The objectives of the CPP are to ensure that the citizens of Jacksonville, particularly persons of low- and moderate-income, persons living in slum and blight areas, units of local government, housing agencies and other interested parties, are provided with the opportunity to participate in the planning and preparation of the Consolidated Plan, including amendments to the Consolidated Plan and the Annual Performance Report. In doing so, the CPP sets forth general policies and procedures for implementing and carrying out the Consolidated Planning process, such as how the Consolidated Plan will be developed, dates and milestones along which the process will proceed, and methods for citizens to offer the City of Jacksonville assistance and guidance in the formulation of the Consolidated Plan. Furthermore, the provisions of the CPP fulfill statutory and regulatory requirements for citizen participation specified in the U.S. Department of Housing and Urban Development's rules for the Consolidated Plan, the HOME Investment Partnerships

(HOME) Program, the Community Development Block Grant (CDBG) Program, the Emergency Shelter Grants (ESG) Program and the Housing Opportunities for Persons with AIDS (HOPWA) Program. In the City of Jacksonville, the Community Development Department administers CDBG funds. The Community Development Department is the lead agency for developing the Consolidated Plan.

In order to ensure maximum participation in the Consolidated Planning process among all populations and needs groups, and in order to ensure that their issues and concerns are adequately addressed, the Community Development Director will follow the standards set forth in its adopted CPP during development of its Consolidated Plan, Action Plan and Annual Performance Report.

### **Encouraging Citizen Participation**

The Consolidated Plan is designed to enumerate the City of Jacksonville's overall strategy for coordinating federal and other housing and community development resources to provide decent housing, establish and maintain a suitable living environment, and expand economic opportunities, particularly for low- and moderate-income persons.

Interested groups and individuals are encouraged to provide input into all aspects of Jacksonville's Consolidated Planning activities, from assessing needs to setting priorities through performance evaluation. By following the CPP, numerous opportunities for citizens to contribute information, ideas and opinions about ways to improve our neighborhoods, promote housing affordability and enhance the delivery of public services to local residents will occur.

The City of Jacksonville is committed to keeping all interested groups and individuals informed of each phase of the Consolidated Planning process and of activities being proposed or undertaken under HUD formula grant programs. Opportunities to comment on or participate in planning community development and affordable housing activities and projects will be publicized and disseminated throughout the City of Jacksonville.

### **Public Hearings and Meetings**

The City will conduct at least two (2) public hearings to obtain citizens' views and to respond to proposals and questions. The hearings will take place at different stages of the Consolidated Planning process. At least one will occur prior to development of the Draft Plan and will be intended to solicit public input regarding distinct issues, thereby aiding policy formation. At least one more will occur after the Draft Plan has been released for public review, allowing interested parties an opportunity to review the strategies and how they were developed, designed and presented.

Information about the time, location and subject of each hearing will be provided to citizens at least fourteen (14) calendar days in advance through adopted public notice and outreach

procedures. This notification will be disseminated to local governments and other interested parties. Public notification of the hearings will be published in the local newspaper. Community Development Department staff may also attend other meetings and conventions in the City of Jacksonville throughout the year, thereby providing an opportunity for additional public information on the Consolidated Plan.

Every effort will be made to ensure the public hearings are inclusive. Hearings will be held at convenient times and locations and in places where people most affected by proposed activities can attend. The Community Development Director will utilize hearing facilities that are accessible to persons with mobility impairments. If written notice is given at least seven (7) days before a hearing date, the City of Jacksonville will provide appropriate materials, equipment and interpreting services to facilitate the participation of non-English speaking persons and persons with visual and / or hearing impairments. Interpreters will be provided at public hearings where a significant number of non-English speaking residents can be reasonably expected to participate. All public hearings and public meetings associated with the Consolidated Planning process will conform to applicable Arkansas open meeting laws.

However, the Community Development Director may, at his or her discretion, actively solicit input on housing and community development issues in during the course of the year with other forums, town hall meetings and other venues, as they may present themselves.

### **Publication of Consolidated Plan Documents**

The Community Development Director will publish the Draft Consolidated Plan for public review in a manner that affords citizens, public agencies and other interested parties a reasonable opportunity to examine its contents and submit comments. The Draft Plan will be a complete document and shall include:

- The amount of assistance the City of Jacksonville expects to receive; and,
- The range of activities that may be undertaken, including the estimated amount that will benefit persons of low- and moderate-income.

A succinct summary of the Draft Plan will be published in a newspaper of general circulation at the beginning of the public comment period. The summary will describe the contents and purpose of the Consolidated Plan (including a summary of specific objectives) and include a list of the locations where copies of the entire proposed Consolidated Plan may be obtained or examined. The following are among the locations where copies of the public comment Draft Plan will be made available to inspections:

- Community Development Department located at 109 S. Second Street
- City Hall located at #1 Municipal Drive;
- Public Library located at 703 West Main Street; and,
- City of Jacksonville's website at [www.cityofjacksonville.net](http://www.cityofjacksonville.net).

Citizens and groups may obtain a reasonable number of free copies of the proposed Consolidated Plan by contacting the Community Development Director at (501) 982-0026 or the document may be downloaded from the City's website at [www.cityofjacksonville.net](http://www.cityofjacksonville.net).

### **Public Comments on the Draft Consolidated Plan and Annual Action Plans**

The City of Jacksonville's Community Development Department, as lead agency, will receive comments from citizens on its Draft Plan for a period not less than thirty (30) days prior to submission of the Consolidated Plan or Annual Action Plans to HUD. The Draft Annual Action Plan will be scheduled for release in November of each year.

All comments or views of citizens received in writing during the thirty (30) day comment period will be considered in preparing the final Consolidated Plan. A summary of these comments or views and a summary of any comments or views not accepted and the reasons therefore shall be attached to the final Consolidated Plan.

### **Public Notice and Outreach**

An informed citizenry is critical to effective and responsive housing and community development programs. Efforts to educate residents and empower their participation are an ongoing element of the Consolidated Planning process.

As the fundamental means of notifying interested citizens about the Consolidated Plan and related activities, such as the Annual Action Plan or the Consolidated Annual Performance and Evaluation Report, the Community Development Director will utilize advertisement notices in newspapers of general circulation. Such notices will be published at least fourteen (14) calendar days prior to public hearings. All notices will be written in plain, simple language and direct efforts will be undertaken to publish and / or post information at locations that will elicit maximum low- and moderate-income and minority participation.

Public education and outreach will be facilitated through the use of Public Advertisements that describe the Consolidated Planning process, opportunities for citizen participation and available funding through the CDBG program. The City's Consolidated Plan mailing list will likely include social service organizations, local jurisdictions, low- income housing consumers, neighborhood groups, previous participants and commentators, and others expected to desire input on the Plan. This list is updated periodically and is available for inspection at the Community Development Department.

## **Technical Assistance**

Groups or individuals interested in obtaining technical assistance to develop project proposals or applying for funding assistance through HUD formula grant programs covered by the Consolidated Plan may contact the Community Development Director. Such assistance may be of particular use to community development organizations, non-profit service providers, and for-profit and non-profit housing development groups that serve or represent persons of low- and moderate-income. Pre-application workshops offer basic program information and materials to potential project sponsors, and the Community Development Director will provide in-depth guidance and assistance to applicants and program participants on an on-going basis. Emphasis is placed on capacity development of community-based organizations.

## **Amendments to the Consolidated Plan**

Pursuant to HUD regulations, an amendment to the Consolidated Plan is required whenever the Jurisdiction determines to:

- Substantially change the allocation priorities or its method of distributing HUD formula grant funds;
- Utilize formula grant funds (including program income) to carry out activities not previously described in the Action Plan; and,
- Change the purpose, scope, location or beneficiaries of an activity.

Such changes, prior to their implementation, are reviewed under various federal or local requirements, particularly rules on procurement and / or policies on the allocation of public resources. Substantial amendments to the Consolidated Plan are, in addition, subject to a formal citizen participation process. Notice and the opportunity to comment will be given to citizens through public notices in local newspapers and other appropriate means, such as direct mail or public meetings. A public comment period not less than thirty (30) days will be provided prior to implementing any substantial amendment to the Consolidated Plan. The Community Development Director will prepare a summary of all comments received in writing and, in cases where any citizens' views are not accepted, provide reasons for the decision. This documentation will be attached to the substantial amendment, which will be available to the public and submitted to HUD.

## **Substantial Amendments**

Occasionally, public comments warrant an amendment to the Consolidated Plan. The criteria for whether to amend are referred to by HUD as Substantial Amendment Criteria. The following conditions are considered to the "Substantial Amendment Criteria":

1. Any change in the described method of distributing funds to local governments or non-profit organizations to carry out activities. Elements of a “method of distribution” are:
  - A. Application process for non-profits;
  - B. Allocation among funding categories;
  - C. Grant size limits; and,
  - D. Criteria selection.
  
2. An administrative decision to reallocate all the funds allocated to an activity in the Action Plan to other activities of equal or lesser priority need level, unless the decision is a result of:
  - A. Federal government recall of appropriated funds, or appropriates are so much less than anticipated that the City makes an administrative decision not to fund one or more activities; or
  - B. The governor declares a state of emergency and reallocates federal funds to address the emergency; and,
  - C. A unique economic development opportunity arises where the City administration asks that federal grants be used to take advantage of the opportunity.

### **Citizen Participation in the Event of a Substantial Amendment**

In the event of a substantial amendment to the Consolidated Plan, the Community Development Director, depending on the nature of the amendment, will conduct at least one additional public hearing. This hearing will follow a comment period of no less than thirty (30) days, where the proposed substantially amended Consolidated Plan will be made available to interested parties. Citizens will be informed of the public hearing through newspaper notification prior to the hearing, and the notice will appear in at least one newspaper which is circulated city-wide.

- Citizens will be notified of the substantially amended Consolidated Plan’s availability through newspaper notification prior to the thirty (30) day substantially amended Consolidated Plan comment period. The notification will appear in at least one newspaper that is circulated throughout the City. The substantially amended sections of the Consolidated Plan will be available on the City of Jacksonville’s website, [www.cityofjacksonville.net](http://www.cityofjacksonville.net), for the full public comment period.

### **Consideration of Public Comments on the Substantially Amended Plan**

In the event of substantial amendments to the Consolidated Plan, the City will openly consider any comments on the substantially amended Consolidated Plan from individuals or groups. Comments must be received in writing or at public hearings. A summary of the written and public hearing comments on the substantial amendments will be included in the final Consolidated Plan. Also included in the final Consolidated Plan will be a summary of all comments not accepted and their reasons for dismissal.

## **Changes in Federal Funding Level**

Any changes in federal funding level after the Consolidated Plan's draft comment period has expired and the resulting effect on the distribution of funds will not be considered an amendment or a substantial amendment.

## **Standard Amendments**

"Standard amendments" are those that are not considered substantial in nature and pertain chiefly to minor administrative modifications of the programs. Thus they do not require in-depth citizen participation.

## **Annual Performance Reports**

Performance reports on programs covered by the Consolidated Plan are to be prepared by the Community Development Director for annual submission to HUD within ninety (90) days of the start of each program year. Draft performance reports will be made available upon written request. The draft performance report will be available for comment for no less than fifteen (15) days, and any public comments received in writing will be reported in an addendum to the final performance report.

## **Access to Records**

To the extent allowed by law, interested citizens and organizations shall be afforded reasonable and timely access to records covering the preparation of the Consolidated Plan, project evaluation and selection, HUD's comments on the Plan and annual performance reports. In addition, materials on formula grant programs covered by the Consolidated Plan, including activities undertaken in the previous five (5) years, will be made available to any member of the public who request information from the Community Development Department. A complete file of citizen comments will also be available for review by interested parties. After receiving notice of HUD's approval of its Consolidated Plan, the Community Development Director will inform those on its mailing list of the availability of the final Plan document and of any HUD comments on the Consolidated Plan.

## **Complaints and Grievances**

Citizens, administering agencies and other interested parties may submit complaints and grievances regarding the Consolidated Plan. Complaints should be in writing, specific in their submit matter, and include facts to support allegations. The following are considered to constitute complaints to which a response letter is due:

- The administering agency has purportedly violated a provision of this Citizen Participation Plan;



- The administering agency has purportedly violated a provision of federal CDBG program regulations; and,
- The administering agency, or any of its contractors, has purportedly engaged in questionable practices resulting in waste, fraud or mismanagement of any program funds.

Residents may also present complaints and grievances orally or in writing at the community meetings and / or public hearings. All public comments, including complaints and grievances, made either orally or in writing with the thirty (30) day public comment period, will be included in the final Consolidated Plan. Such complaints or grievances shall be directed to the Consolidated Plan representative, the City's Community Development Director.

### **Timely Response to Complaints or Grievances**

Upon receipt of a written complaint, the Community Development Director shall respond to the complainant within fifteen (15) calendar days and maintain a copy of all related correspondence, which will be subject to Community Development Department review.

Within fifteen (15) calendar days of receiving the complaint, the Community Development Director shall discuss the matter with the Mayor and respond to the complainant in writing. A copy of the response from the Community Development Director will be transmitted, concurrently, to the complainant and to the Mayor. If, due to unusual circumstances, the Community Development Director finds that he / she is unable to meet the prescribed time limit, the limit may be extended by written notice to the complainant. The Community Development Director's notice must include the reason for the extension and the date on which a response is expected to be generated, which may be based on the nature and complexity of the complaint.

Public review materials and performance reports will include data, as appropriate under confidentiality regulations, on any written complaints received and how each was resolved.

## **Activities Exempt from Substantial Amendment Citizen Participation Requirements**

### **Urgent Needs**

It may be necessary to amend the Consolidated Plan in the event of an emergency such as a natural disaster. These amendments may include funding new activities and / or the reprogramming of funds including canceling activities to meet community development needs that have a particular urgency. Therefore, the City of Jacksonville, acting through the Community

Development Department may utilize its CDBG funds to meet an urgent need without the normal public comment period, which is otherwise required for substantial amendments.

To comply with the national objective of meeting community development needs having a particular urgency, an activity will alleviate existing conditions that the City of Jacksonville certifies:

- Pose a serious and immediate threat to the health and welfare of the community;
- Are of recent origin or recently became urgent;
- The City and the Community Development Department are unable to finance the activity on their own; and,
- Other resources of funding are not available to carry out the activity.

A condition will generally be considered to be of recent origin if it is developed or became critical within eighteen (18) months preceding the Community Development Department's certification.

### **Availability of the Citizen Participation Plan**

Copies of the Citizen Participation Plan may be obtained by contacting the Community Development Director at (501) 982-0026 or on the City's website at [www.cityofjacksonville.net](http://www.cityofjacksonville.net). Upon request, the Community Development Director will make the Citizen Participation Plan available in an alternative format accessible to persons with disabilities.

## **APPENDIX B – COMMUNITY INVOLVEMENT PUBLICATIONS**

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The public involvement process followed the requirements specified in the Citizen Participation Plan, as noted in Appendix A. However, the following narrative and exhibits provide additional information about the outreach, notification, and public involvement opportunities offered to the citizen of City of Jacksonville in the development of the *2014 Annual Action Plan*.

### **Public Input Meeting**

Public input meetings were held on September 12, September 17 (three separate meetings), and September 23 of 2013. The purpose of these meetings was to allow citizens of Jacksonville to give input and submit comments for projects that will be funded by CDBG funds. Attendees were urged to offer perspective and commentary about identified needs and their opinions about needs that the city should consider.

### **ADVERTISEMENT DOCUMENTATION**

Documentation of community outreach in relation to advertisement of the public input meeting is presented on the following page.









## **APPENDIX C – PROJECT SELECTION CRITERIA**

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The City of Jacksonville has a standing commitment to two non-profit organizations in the area. The first organization is the Jacksonville Care Channel; it is the city's primary service provider for the homeless and receives monies annually. The second is Fishnet Mission, which provides food to individuals throughout the city. In the past, the city has also committed monies to providing transportation services to the elderly. This program has been selected to continue to receive funds for the upcoming year. The Community Development Department allocates funds to the highest and best use for the community based on citizen's input, activity eligibility, and low/mod benefits.



## **APPENDIX D – MONITORING AND AUDIT REQUIREMENTS**

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### **MONITORING PLAN**

**Grantee: City of Jacksonville**  
**Subject: CDBG Sub-recipients**

**Period: FY 2014**  
**Contact: Theresa Watson**

#### Objectives:

- To ensure that sub-recipients are complying with all applicable rules under the CDBG program, especially financial management standards.
- To identify areas where technical assistance may be offered to build capacity with operating assistance.

#### Procedure for non housing rehabilitation projects:

- Prepare for visit by brushing up on rules and reviewing materials, especially the submitted proposal of sub-recipient.
- Conduct visit as follows:
  1. Notify of date, scope, focus of review
  2. Hold entrance conference with chief official
  3. Document, gather and analyze
  4. Hold exit conference to report results, hear reaction and form conclusions
- Follow-up with letter that both praises and problem area(s) found during visit.

#### Procedure for housing rehabilitation projects:

The Community Development Department tracks conditions of the community housing stock and coordinates all housing related activities and programs within the city. This department also periodically assesses the affordable housing needs of the City's residents and monitor trends in local lending/financing practices. The Department periodically reports its findings to the Mayor and City Council.

The purpose of the Community Development Rehabilitation Program is to help very low and low to moderate income homeowners repair their homes to meet the Section 8 Minimum Housing Quality Standards and to city code. The guide for 'standard condition', for purpose of this program, are items described by the U.S. Department of Housing and Urban Development "Inspection Form: Housing Choice Voucher Program (HUD-52580-A (9/00)). Materials, equipment, and facility conditions that are deficient as evaluated against that standard, normally are to be repaired or replaced as part of rehabilitation.

CDBG Program: Each application for funding will be thoroughly reviewed to ensure the client's qualifications meet CDBG guidelines. Based on how the City operates its program, loan/grant, the client's ability to pay has bearing on the terms and conditions of the loan agreement. Once the terms have been determined, a letter is sent to the homeowner outlining the loan amount, term of the loan and monthly payments. Periodically each loan is reviewed for payment history and troubled accounts will be addressed. The files are kept active until either the loan is paid in full or the affordability period of the forgivable loan has been satisfied, whichever is the longest.

HOME Program: Each application for funding will be thoroughly reviewed to ensure the client's qualifications meet HOME standards. ADFA staff independently monitors agencies receiving funds from the HOME Program. However, Community Development is responsible for monitoring, progress, and completion of all applications/projects.

On an annual basis, staff in our office will verify the following during the affordability period:

- Residence
- Insurance is current
- Taxes are current
- Homeowner is complying with all city codes

In addition to the above verifications, staff will perform an inspection of the home according to HOME guidelines for affordability.

Community Development will maintain current and accurate files on all HOME projects. During the affordability period, all active files will be kept together in a file cabinet according to last name. Once the affordability period has been satisfied, all inactive files will be kept in a master file cabinet of all project (HOME, CDBG, other housing project) according to last name.

Risk Assessment:

Factors: Sub-recipients undertaking multiple activities, conducting housing or economic development projects; being lead by new management.

Ranking: Jacksonville Care Channel – Low risk (previous monitoring by City resulted in minimum findings).

Fishnet Missions of Jacksonville – Low risk (previous monitoring by City resulted in minimum findings).

Jacksonville Boys & Girls Club – High risk (new project)

Jacksonville Our Club – High risk (new project)

Schedule:

Visits:

Jacksonville Boys & Girls Club – TBD

Jacksonville Care Channel – TBD

Fishnet Mission – TBD

Jacksonville Our Club - TBD

Approval

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Mayor

Date

## APPENDIX E – PUBLIC INPUT FROM PUBLIC HEARINGS

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1. Continue the taxi voucher program\*\*
2. Re-surface basketball court at Martin Street Center
3. Move concession stand at the Jacksonville Boys and Girls Club\*\*
4. Purchase new stove for Jacksonville Boys and Girls Club concession stand\*\*
5. Tennis court at Boys and Girls Club
6. Replenish shredded rubber in playground fall areas\*\*
7. Provide funding for demolition of old school building for new Fine Art Center
8. Increase parking at Galloway Park\*\*
9. Curb cuts for crossing street (Towers to Worley's) to access sidewalk
10. Self-demolitions for Sunnyside Neighborhood\*\*
11. Install walkway/sidewalk behind Worley's Place
12. Replace picnic tables at Worley's Place
13. Purchase a golf cart for Worley's Place
14. Install benches under big shade tree at Worley's Place
15. Create bike trails/riding trails in the parks
16. Purchase gardening equipment for community gardens\*\*
17. Provide funding for at risk youth for cultural enrichment\*\*

\*\* Denotes projects selected/eligible for funding



















# Grantee Certifications

## Affirmatively Further Fair Housing

The City of Jacksonville' 1992 ordinance on fair housing was amended in 1996 to broaden its ability to equal opportunity in affordable housing and provide for local recourse for housing complaints. The City Council approved a separate ordinance in 1998 to include a Fair Housing Section that expanded the option for moderate to low-income persons to acquire manufactured homes. This was an added dimension to increase needed housing stock quickly with low up-front cost, and still ensures suitable housing. The Mayor and City Council are vigilant for Fair Housing issues in bi-monthly meetings and all public hearings. The City of Jacksonville is very active in terms of funding and leadership as three Central Arkansas City members of the North Pulaski Community Housing Resource Board. Through this organization, the City promotes educating renters, landlords, realtors, and potential homebuyers their rights and responsibilities in Fair Housing. The City also employs a full time Director of Community Development, who is tasked as the City's Fair Housing Officer with daily oversight of Fair Housing concerns. Other responsibilities of this position include review, validate, and assist equitable resolution of local complaints or concerns relative to Fair Housing. The 1996 City of Jacksonville Fair Housing Ordinance as amended recognizes individual's right to obtain housing, related financial and other assistance without discrimination. Further:

The grant will be conducted and administered in compliance with:

1. Title VI of the Civil Rights Act of 1964 (Public Law 88-35 42 U.S.C. Par 2000d et sec); and
2. The Fair Housing Act (42 U.S.C. 3601-20);

The City will affirmatively further fair housing and will continue, as in the past, to conduct analyses of impediments to fair housing and take the appropriate actions to overcome any identified impediments;

The City has developed its final statement of projected use of funds so as to give maximum feasible priority to activities which benefit low and moderate income families or aid in the prevention or elimination of slums or blight; (the final statement of projected use of funds may also include activities which the grantee certifies are designed to meet other community development needs having a particular urgency because existing conditions pose a serious and immediate threat to the health or welfare of the community, and other financial resources are not available); except that the aggregate use of CDBG funds received under Section 106 of the act and, if applicable, under section 108 of the act, during the 01-02-03-04 program years, shall principally benefit persons of low and moderate income in a manner that ensures that not less than 50% of such funds are used for activities that benefit such persons during such period;

The City has developed a community development plan, for the period specified in the paragraph above, that identifies community development and housing needs and specifies both short and long term community development objectives and requirements of the Act;

The City is following a current Consolidated Plan which has been approved by HUD pursuant to 24 CFT Sec. 570.901, and that any housing activities to be assisted with CDBG funds will be consistent with the Consolidated Plan;

The City will not attempt to recover any capital costs of public improvements assisted in whole or in part with funds provided under section 106 of the Act or with amounts resulting from a guarantee under Section 108 of the Act by assessing any amount against properties owned and occupied by persons of low and moderate income, including any fee charged or assessment made as a condition of obtaining access to such public improvements, unless;

1. Funds received under Section 106 of the Act are used to pay the proportion of such fee or assessment that relates to the capital costs of such public improvements that are financed from revenue sources other than under Title 1 of the act; or
2. For purposes of assessing any amount against properties owned and occupied by persons of moderate income, the grantee certifies to the Secretary that it lacks sufficient funds received under Section 106 of the Act to comply with the requirements of Subparagraph (1) above;

## **Anti-Displacement and Relocation Plan**

The City will comply with the acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended, as required under Sec. 570.606(a) and Federal implementing regulations; the requirements in Sec. 570.606(b) governing the residential anti-displacement and relocation assistance plan under section 104(d) of the Housing and Community Development Act of 1974, as amended, (including a certification that the grantee is following such a plan); the relocation requirements of Sec. 570.606(c) governing displacement subject to section 104(k) of the Act; and the relocation requirements of Sec. 570.606(d) governing optional relocation assistance under Section 105(a) (11) of the Housing and Community Development Act of 1974, as amended; Although we seek to avoid displacement when necessary the displaced persons are provided suitable lodging and all expenses related to the move are paid for by this office.

## Drug Free Workplace

The grantee certifies that it will provide a drug-free workplace by:

1. Enforcing Ordinance No. 911 establishing a drug free workplace, notifying employees that the unlawful manufacture, distribution, dispensing, possession, possession or use of a controlled substance is prohibited in the grantee's workplace and specifying the actions that will be taken against employees for violations of such prohibition;
2. Establishing a drug free awareness program to inform employees about;
  - a. The dangers of drug abuse in the workplace;
  - b. The grantee's policy of maintaining a drug free workplace;
  - c. Any available drug counseling, rehabilitation, and employee assistance program; and
  - d. The penalties that may be imposed upon employees for drug abuse violations occurring in the workplace.
3. Making it a requirement that each employee to be engaged in the performance of the grant be given a copy of the statement required by paragraph (a);
4. Notifying the employee in the statement required by paragraph (a) that, as condition of employment under the grant, the employee will;
  - a. Abide by the terms of the statement; and
  - b. Notify the employer of any criminal drug statute conviction for a violation occurring in the workplace no later than five days after such conviction;
5. Notifying the agency within 10 days after receiving notice under subparagraph (d)(2), from an employee or otherwise receiving actual notice of conviction. Employers of convicted employees must provide notice, including position, title, to every grant officer or other designee on whose grant activity the convicted employee was working, unless the Federal agency has designated a central point for the receipt of such notices. Notice shall include the identification number(s) of each affected grant;
6. Taking one of the following actions within 30 days of receiving notice under subparagraph (d)(2), with respect to any employee who is so convicted;
  - a. Taking appropriate personnel action against such an employee up to and including termination; or,

- b. Requiring such employee to participate satisfactorily in a drug abuse assistance or rehabilitation program approved by a Federal, State, or local health, law enforcement, or other appropriate agency;
7. Making a good faith effort to continue to maintain a drug free workplace through implementation of paragraphs (1), (2), (3), (4), (5), and (6).
8. Place of Performance is 109 South Second Street, Jacksonville, Pulaski County, Arkansas, 72076.

## **Anti-Lobbying**

To the best of the City's knowledge and belief;

1. No Federal appropriated funds have been paid or will be paid by or on behalf of it, to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this Federal contract, grant, loan or cooperative agreement;
2. If any funds other than Federal appropriated funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this Federal Contract, grant, loan, or cooperative agreement, it will complete and submit Standard Form-LLL, "Disclosure Form to Report Lobbying," in accordance with its instructions; and,
3. It will require that the language of paragraph (n) of this certification be included in the award documents for all sub-wards at all tiers (including subcontracts, sub-grants, and contracts under grants, loans, and cooperative agreements) and that all sub recipient shall certify and disclosure accordingly.

## **Authority of Jurisdiction**

The City's consolidated plan is authorized under State and local law (as applicable) and the jurisdiction possesses the legal authority to carry out the programs for which it is seeking funding, in accordance with applicable HUD regulations.



## Consistency with Plan

The housing activities to be undertaken with CDBG, HOME, ESG, and HOPWA funds are consistent with the strategic plan.

## Section 3 Action Plan for Contracts

The City of Jacksonville undertakes several activities designed to achieve the employment and business opportunity goals inclusive of the Section 3 clause in all contracts.

There is included herein language which the City will require to be included in all Federally assisted contracts. When the City sells, leases, transfers, or otherwise conveys land upon which work in connection with a Section 3 covered project is to be performed, it shall include in each contract or subcontract for work on such land the so-called Section 3 Clause defined above and presented below requiring the purchaser, lessee, or redeveloper to assume the same obligations as a contractor for work under this plan; provided that each such purchaser, lessee, or redeveloper shall be relieved of such obligations upon satisfactory completion of all work to be performed under the terms of the redevelopment contract.

Accordingly, every applicant, recipient, contracting party, contractor, and subcontractor shall incorporate, or cause to be incorporated in all contracts for work in connection with a Section 3 covered project, the following clause, referred to in this plan as the “Section 3 Clause” which shall incorporate the following paragraphs 1,2,3,4 and 5.

1. The work to be performed under this contract is on a project assisted under a program providing direct Federal financial assistance from the Department of Housing and Urban Development and is subject to the requirements of Section 3 of the Housing and Urban Development Act of 1968, as amended, 12 U.S.C. 170LU. Section 3 requires that to the greatest residents of the city and contracts for work in connection with the project is awarded to business concerns that are located in, or owned in substantial part by persons residing in the target area.
2. The parties to this contract will comply with the provisions of said Section 3 and the regulations issued pursuant thereto by the Secretary of Housing and Urban Development set forth in 24CFR, and all applicable rules and orders of the Department issued there under prior to the execution of this contract. The parties to this contract certify and agree that they are under no contractual or other disability that would prevent them from complying with these requirements.

3. The Contractor will send to each labor organization or representative of workers with which he has a collective bargaining agreement or other contract or understanding, if any, a notice advising the said labor organization or workers' representative of his commitments under this Section 3 clause and shall post copies of the notice in conspicuous places available to employees and applicants for employment or training.
4. The Contractor will include this Section 3 Clause in every subcontract for work in connection with the project and will, at the direction of the applicant for or recipient of Federal financial assistance, take appropriate action pursuant to the subcontract upon a finding that the subcontractor is in violation of regulations issued by the Secretary of Housing and Urban Development, 24 CFR. The Contractor will not subcontract with any subcontractor where it has notice or knowledge that the latter has been found in violation of regulations under 24 CFR and U.S. Employment Service, and/or local employment services.
5. Compliance with the provisions of Section 3, the regulations set forth in 24 CFR, and all applicable rules and orders of the Department issued there under prior to the execution of the contract, shall be a condition of the Federal financial assistance provided to the project, binding upon the applicant or recipient for such assistance, its successors, and assigns. Failure to fulfill these requirements shall subject the applicant or recipient, its contractors and subcontractors, its successors, and assigns to those sanctions specified by the grant or loan agreement or contract through which Federal assistance is provided, and to such sanctions as are specified by 24 CFR 135.

### **Good Faith Demonstration of Training Goals**

One of the objectives of this plan is to assure that all applicants, recipients, and contractors undertaking work in connection with the Section 3 covered project fulfill their obligations to utilize lower-income residents of the City as trainees to the greatest extent feasible by:

- (a) Utilizing the maximum number of persons in the various training categories in all phases of the work to be performed under the Section 3 covered project;
- (b) Filling all vacant training positions with lower-income project area residents except those training positions, which remain unfilled after a good faith effort, has been made to fill them with eligible lower-income project area residents.

For the building construction occupations, the number of trainees or apprentices for each occupation shall be that number which can reasonable be utilized in each occupation on each phase of a Section 3 covered project and in no event shall that number be less than the number of trainees or apprentices determined pursuant to regulations issued by the Secretary of Labor for each building construction occupation.

For non-construction occupations or for any building construction occupation for which ratios are not determined pursuant to regulations of the Secretary of Labor, the number of trainees for each occupation shall be that number which can reasonable be utilized in each occupation on each phase of a Section 3 covered project. The applicant, recipient, contractor, or subcontractor shall initially determine the maximum number of trainees for each occupation and submit that determination along with its justification to the city that, in turn, if it deems necessary, will notify the Department.

Each applicant, recipient, contractor, or subcontractor seeking to establish that a good faith effort has been made to fill all training positions with lower-income area residents shall demonstrate that it has attempted to recruit from the City the necessary number of lower-income residents as trainees through various methods including but not necessarily limited to local advertising media, signs placed at the proposed site for the project, and community organizations and will not let any subcontract unless the subcontractor has first provided it with a preliminary statement of ability to comply with the requirements of these regulations.

### **Good Faith Demonstration of Employment Goals**

In order to achieve the plan's employment goals, the City shall cause each applicant (including itself), recipient, contractor, or subcontractor understating work in connection with the Section 3 covered project to fulfill his obligation to utilize lower-income area residents as employees to the greatest extent feasible by:

- (a) Identifying the number of positions in the various occupational categories including skilled, semi-skilled and unskilled labor, needed to perform each phase of the Section 3 covered projects;
- (b) Identifying of those positions identified in paragraph (a), the number of positions in the various occupational categories which are currently occupied by regular, permanent employees;
- (c) Identifying of the positions identified in paragraph (a), the number of positions in the various occupational categories which are not currently occupied by regular, permanent employees;
- (d) Establishing of the positions identified in paragraph (c) a goal which is consistent with the goals of this plan established above in Part III within each occupational category of the number of positions to be filled by lower-income residents of the City;

- (e) Making a good faith effort to fill all of the positions identified in paragraph (d) with lower- income area residents.

In order to demonstrate that a good faith effort has been made to fill all employment positions identified in paragraph (d) above with lower-income area residents, each applicant, recipient, contractor, or subcontractor shall indicate that he has attempted to recruit from the city the necessary number of lower-income residents established through his goal above through various methods including but not limited to local advertising media, signs placed at the proposed sites for the project, and community organizations and public or private institutions operating within or serving the City, such as the Citizen Committee, Service, Employment, and Redevelopment (SLR), Opportunities Industrialization Center (OIC), Urban League, Concentrated Employment Program, public or private institutions operating within or serving the project area such as U.S. Employment Service, State or local employment service, Urban League, and other local agencies or entities;

Maintained a list of all lower-income area residents who have applied either on their own or upon referral from any source and indicated that it had employed such persons if otherwise eligible and if a training vacancy exists. If the contractor has no vacancies, the applicant, if otherwise eligible, shall be listed for the first available trainee vacancy.

If any applicant, recipient, contractor, or subcontractor fills an apprentice or trainee position in its organization immediately prior to undertaking work pursuant to a Section 3 covered project, he shall be prepared to provide evidence acceptable to the Secretary that his actions were not an attempt to circumvent the requirements of this plan.

When lower-income residents of the target area apply for permanent employment positions, either on their own initiative or upon referrals from any source, the recipient, contractor, or subcontractor shall determine the qualifications of such person and shall employ such persons if the contractor has openings. If the recipient, contractor, or subcontractor is unable to employ the workers, such persons shall be listed for the first available opening.

## **Other Methods**

The principal methods by which the City will accomplish the goals of this Compliance Plan are those described in sub-parts A., B., C., D., and E. Additionally, the City will undertake four other activities designed to implement this plan.

One, the City will notify every prospective contractor for work in connection with the Section 3 covered project that his employment and subcontracting activities will be subject to the application of this plan.

Two, the City will require all prospective contractors for work in connection with the Section 3 covered project to provide prior to signing a contract with the City a preliminary statement of work force needs (skilled, semi-skilled, unskilled labor, and trainees by category) where known; provided that where not known, such information shall be supplied prior to the signing of any contract between contractors and their subcontractors.

Three, when work is to be contracted through a bid, the City shall insert in the invitation or solicitation for bids, information indicating the existence of this Section 3 Compliance Plan and the fact that its requirements will be applicable to the contract.

Four, when contracts are let through negotiation or methods other than formal bidding procedures, the City shall advise prospective contractors of the requirements of the Section 3 Compliance Plan.

## **Community Development Plan**

The City's consolidated housing and community development plan identifies community development, housing needs and specifies both short-term, and long-term community development objectives that provide decent housing, expand economic opportunities primarily for persons of low and moderate income.

## **Following a Plan**

The City is following a current consolidated plan that has been approved by HUD.

## **Use of Funds**

The City has complied with the following criteria: See "compliance with Anti-discrimination laws" for details.

## **Excessive Force**

The City has adopted and is enforcing;

1. A policy prohibiting the use of excessive force by law enforcement agencies within its jurisdiction against any individuals engaged in nonviolent civil rights demonstrations; and

## Compliance with Anti-discrimination laws

The grant will be conducted and administered in conformity with title VI of the Civil Rights Act of 1964 (42 USC 2000d), the Fair Housing Act (42 USC 3601-3619), and implementing regulations. It will comply with applicable laws.

1. Maximum Feasible Priority. With respect to activities expected to be assisted with CDBG funds, it certifies that it has developed its Action Plan so as to give maximum feasible priority to activities, which benefit low and moderate-income families or aid in the prevention or elimination of slums or blight. The Action Plan may also include activities which the grantee certifies are designed to meet other community development needs having a particular urgency because existing conditions pose a serious and immediate threat to the health or welfare of the community, and other financial resources are not available;
2. Overall Benefit. The aggregate use of CDBG funds including section 108 guaranteed loans during program years January 2000 through January 2005 (a period specified by the grantee consisting of five specific consecutive program years), shall principally benefit persons of low and moderate income in a manner that ensures that at least 50 percent of the amount is expended for activities that benefit such persons during the designated period;
3. Special Assessments. Grantee will not attempt to recover any capital costs of public improvements assisted with CDBG funds including Section 108 loan guaranteed funds by assessing any amount against properties owned and occupied by persons of low and moderate income, including any fee charged or assessment made as a condition of obtaining access to such public improvements.

However, if CDBG funds are used to pay the proportion of a fee or assessment that relates to the capital costs of public improvements (assisted in part with CDBG funds) financed from other revenue sources, an assessment or charge may be made against the property with respect to the public improvements financed by a source other than CDBG funds.

The jurisdiction will not attempt to recover any capital costs of public improvements assisted with CDBG funds, including Section 108, unless CDBG funds are used to pay the proportion of fee or assessment attributable to the capital costs of public improvements financed from other revenue sources. In this case, an assessment or charge may be made against the property with respect to the public improvements financed by a source other than CDBG funds. Also, in the case of properties owned and occupied by moderate-income (not low-income) families, an assessment or charge may be made against the property for public improvements financed by a source other than CDBG funds if the jurisdiction certifies that it lacks CDBG funds to cover the assessment.

## **Compliance with Laws**

The City will comply with the other provisions of the Act and with other applicable laws.

Name and Title of Authorized Representative:

Signature: \_\_\_\_\_ Date: April 10, 2014  
Gary Fletcher, Mayor

