



# Sheboygan 2014 Program Year Fifth Year Action Plan

The CPMP 5<sup>th</sup> Annual Action Plan includes the SF 424 and Narrative Responses to Action Plan questions that CDBG, HOME, HOPWA, and ESG grantees must respond to each year in order to be compliant with the Consolidated Planning Regulations. As of May 2006, the Executive Summary narratives are required.

## Narrative Responses

### ACTION PLAN

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

**JURISDICTION: City of Sheboygan, WI**

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

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

The City of Sheboygan entitlement program has been successful in providing financial support to the City's low to moderate income residents. An overall review of the entire program shows that the City program is a viable source of funding for a program of its size in socioeconomic conditions experienced in the City of Sheboygan, however, recent decreases in overall funding limits has hindered accommodating the needs within the community.

The Action Plan also describes actions to be undertaken to address obstacles in meeting the needs of the under-served, removing barriers, and enhancing coordination in the community. The City of Sheboygan was awarded the yearly allocation of \$863,000 in 2013 to carry out the Action Plan activities of the five-year consolidated plan. The City of Sheboygan's 2014-15 Allocation is \$823,027.

The primary strategic objectives and 2014 outcomes addressed in this Action Plan include the following:

## **Housing**

**Priority:** Make repairs or rehab to existing income-eligible owner-occupied and owner-investor housing to address building code issues and lead based paint issues.

**Objective:** 15 homes of income-eligible homeowners are made safer and lead based paint standards are reduced.

**Priority:** Assist income-eligible households into homeownership.

**Objective:** 2 income-eligible households helped to become homeowners.

**Priority:** Assist owners of rental properties to develop or improve rental housing for lower income households with special needs or homelessness, including such activities as enhanced code enforcement.

**Objective:** 5 rental properties developed or rehabbed to be code compliant, lead safe and/or made affordable.

## **Homeless Needs**

**Priority:** Reduce incidents of homelessness.

**Objective:** 100 persons helped to avoid or mitigate homelessness.

## **Community development (non-housing)**

**Priority:** Increase child care services.

**Objective:** 90 children cared for in a safe, stimulating environment.

## **Economic Development**

**Priority:** Create or retain full-time permanent jobs at living wages.

**Objective:** 4 jobs created or retained.

## **Targeted Geographical Focus Area**

**Priority:** Initiate improvement efforts in locally-selected geographical areas

**Objective:** 1 neighborhood improved through variety of initiatives, including park and infrastructure improvements, community gardens, and signage.

**Priority:** Foster building code compliance of rental and owner occupied properties in locally selected areas.

**Objective:** 100 housing units identified and made code compliant.

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

2. *Provide a summary of the citizen participation and consultation process (including efforts to broaden public participation in the development of the plan.*
3. *Provide a summary of citizen comments or views on the plan.*
4. *Provide a written explanation of comments not accepted and the reasons why these comments were not accepted.*

On an annual basis, public input is specifically sought in the following areas:

1.) A formal public comment period on the one year annual action plan was held on Monday, February 3, 2014 to discuss the proposed allocations. At this public hearing, citizens are encouraged to identify needs and to suggest community development programs and projects to address those needs. Information gained from this hearing is utilized by the Department of Planning and Development for the coming year and is incorporated into the City's Consolidated Plan. There were no attendees at this meeting.

2.) A public comment hearing is held on the Consolidated Annual Performance and Evaluation Report (CAPER) which provides information on the status and performance of CDBG programming is held upon completion of the CDBG program fiscal year and completion of the CAPER, sometime in June. Any comments received at the public hearing or during the public comment period will be included with that Report.

Additionally, public notices are published whenever there is any plan and/or report substantial amendments or a plan and/or report submissions seeking public comment. Public comments are encouraged through meeting attendance or in writing and are at least 30 days in length.

The City of Sheboygan is committed toward citizen participation in its CDBG process. Notices of meetings, application schedules, and other relevant program information are regularly transmitted through various media outlets, direct mail solicitations, and on the City of Sheboygan's website. For the Annual Action Plan, a request for proposals is published in the Sheboygan Press in English, Spanish, and Hmong and on the City's website for organizations interested in applying.

To encourage citizens and community organizations in the development of proposals to address community development needs, a Request for Proposals is released for public service agencies to submit an application, program policies and other technical assistance throughout the program year. Staff assistance is available to agencies and community groups in determining program/project eligibility and in formulating proposals for funding with CDBG funds.

A legal ad is published in the Sheboygan Press 30-days prior to the public hearing (February 4, 2014) for comments regarding the previous year and the current year activities. The City held a second public hearing once the yearly amount was received prior the City review committee reviewing and amending the allocations since a lesser amount was received from HUD. No comments were received from either public hearing during the public comment period regarding for the Annual Action Plan.

Sheboygan has a government of inclusiveness that encourages all of its citizens to participate in its governmental process. No person shall be excluded from participation in the City of Sheboygan CDBG programs on the grounds of race, color, national origin, gender, sexual orientation, age, religious creed, or disability. To encourage equal access in participation for persons with disabilities, all meetings and hearings are held at accessible sites.

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

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

*Identify whether Neighborhood Stabilization Program funding is being used to address priority needs. If the plan includes a Neighborhood Revitalization Strategy Area or Areas, did the jurisdiction identify the census tracts for each NRSA and an estimate of the percentage of funds it plans to dedicate to the NRSA(s)?*

*Identify whether CPD funding will be coordinated with Department of Energy's Energy Efficiency and Conservation Block Grants, and the Department of Labor's Workforce Investment Act programs to provide opportunities for unemployed, lower-skilled, and low-income women and men to advance along a middle class career track of increasing skills and wages.*

7. *Explain how federal funds will leverage resources from private and non-federal public sources.*

The City of Sheboygan has been allocated \$823,027 for the 2014-15 HUD program year. All planning for this program year has been based on this amount.

The City of Sheboygan does not have any Section 8 funds or other sources of federal resources included as part of this annual plan process.

The City of Sheboygan does targeted neighborhoods other than the Neighborhood Revitalization Strategy Area funding as described below.

The City continues to implement the Neighborhood Revitalization Strategy Area (NRSA) which includes Census Tract 5, Block Group 1 and Census Tract 8, Block Group 2. The City of Sheboygan will continue to complete housing rehabilitation in the NRSA during the next calendar year. Funding was also provided to Habitat for Humanity for their new program to provide no-interest loans for eligible applicants and these funds will be dedicated to the NRSA No. 1 area.

One criterion that the City uses when awarding public service dollars to local organizations is the ratio of the amount of private/non-federal public sources of funding to the CDBG funds. Due to the small amount of funds that the City has available each year, each organization is acquiring matching grants from other state/federal/local resources to fund their programs.

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

*\*If not using the CPMP Tool: Complete and submit Table 3A.*

*\*If using the CPMP Tool: Complete and submit the Summary of Specific Annual Objectives Worksheets or Summaries.xls*

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

**Figure 1: HUD \*Outcome/Objective Codes**

<b>Outcomes &gt;&gt;&gt;</b>	<b>Availability/</b>		
<b>Objectives v v v</b>	<b>Accessibility</b>	<b>Affordability</b>	<b>Sustainability</b>
<b>Decent Housing</b>	<i>DH-1</i>	<i>DH-2</i>	<i>DH-3</i>
<b>Suitable Living Environment</b>	<i>SL-1</i>	<i>SL-2</i>	<i>SL-3</i>
<b>Economic Opportunity</b>	<i>EO-1</i>	<i>EO-2</i>	<i>EO-3</i>

**Figure 2: 2013 Housing Objectives and Goals**

Obj#	Specific Objectives	Sources of Funds	Amount 2013	Performance Indicators	Expected Number 2013	Outcome/Objective*
<b>Decent Housing</b>						
• <b>Housing</b>						
H-1	Make repairs or rehab to existing income-eligible owner-occupied housing to address building code issues & lead based paint issues	CDBG	\$45,000	Number of homes made safer and affordable	20 units	DH-1
H-2	Assist income-eligible households into homeownership	CDBG	\$22,500	Number of households helped to become owners	2 households	DH-2
H-3	Assist owners of rental properties to develop or improve rental housing for lower income households with special needs or homelessness, including such activities as enhanced code enforcement.	CDBG	\$50,000	Number of units rehabbed to be code compliant and made affordable	5 units	DH-1

**Figure 3: 2013 Community Development Goals and Objectives**

Obj#	Specific Objectives	Sources of Funds	Amount 2014	Performance Indicators	Expected Number 2014	Outcome/Objective*
<b>Community Development – Suitable Living Environment/Economic Opportunities</b>						
• <b>Public Services/Public Facilities</b>						
CD-1	Reduce incidents			Number of people		

	of homelessness	CDBG	\$67,969	served	2500 people	SL-1
CD-2	Increase child care and youth recreation services	CDBG	1,560	Number of youth served	167 people	SL-1
<b>• Economic Development</b>						
CD-4	Create or retain full-time permanent jobs at living wages	CDBG	Revolving Loan Fund	Number of jobs created or retained for income eligible persons	5-8 jobs	EO-1
CD-5	Improve rate of survival of micro-enterprises through our Revolving Loan Fund	CDBG	Revolving Loan Fund	Number of businesses assisted Number of jobs created and/ or retained	1-2 small businesses 2-3 jobs	EO-1
<b>• Neighborhood Revitalization/Other</b>						
CD-6	Initiate improvement efforts in locally-selected geographical areas	CDBG	\$350,000	Number of neighborhoods improved <ul style="list-style-type: none"><li>(other measurements depend upon type of activity funded)</li></ul>	1 neighborhood	SL-1
CD-7	Foster building code compliance of rental properties in locally selected areas.	CDBG	Included in CD-6	Number of code compliant rental units	100 units	SL-1

• <b>Planning/Administration</b>						
	Administer the program effectively	CDBG	\$164,605	Years of successful administration	1 year	

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

*\*If not using the CPMP Tool: Complete and submit Table 3C*

*\*If using the CPMP Tool: Complete and submit the Projects Worksheets and the Summaries Table.*

9. Provide a summary of the eligible programs or activities that will take place during the program year to address the priority needs and specific objectives identified in the strategic plan.

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

**Figure 4: 2013 Proposed Housing Activities**

2013 Proposed Activities		
Decent Housing		
<b>H-1</b>	Make repairs or rehab to existing income-eligible owner-occupied housing to address building code issues	<b>DH-1</b>
<b>H-2</b>	Assist income-eligible households into homeownership	<b>DH-2</b>
<b>H-3</b>	Assist owners of rental properties to develop or improve rental housing for lower income households with special needs or homelessness, including such activities as enhanced code enforcement.	<b>DH-3</b>

Applicant Agency	Activity Description	Funding Amount	Objective/ Outcome
City of Sheboygan	Housing Rehabilitation Program (RLF)	Revolving Loan Fund	EO-1
Partners for Community Development	Homebuyer Counseling Acquisition	CDBG \$17,500	DH-2 H-2

**Figure 5: 2013 Proposed Community Development Activities**

2013 Proposed Activities		
Community Development		
CD-1	Reduce incidents of homelessness	SL-1
CD-2	Increase child care and youth recreation services	SL-1
CD-3	Increase or improve quality of physical facilities available for services benefiting income-eligible households	SL-1
CD-4	Create or retain full-time permanent jobs at living wages	EO-1
CD-5	Improve rate of survival of micro-enterprises	EO-1
CD-6	Initiate improvement efforts in locally-selected geographical areas	SL-1
CD-7	Foster building code compliance of rental properties in locally selected areas.	SL-1
City of Sheboygan	Administer the program effectively	

Applicant Agency	Activity Description	Funding Amount	Outcome/ Objective
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<b>Public Service/Public Facilities</b>			
City of Sheboygan	Street Improvements	CDBG \$350,000	
Shoreline Metro	Saturday and evening reduced rate bus rides	CDBG \$42,493	<b>SL-1 CD-1 CD-6</b>
Family Connections	Reduce rate for child care	CDBG \$1,560	<b>SL-1 CD-2</b>
Mental Health America	Provide the emergency medication account	CDBG \$1,950	<b>SL-1 CD-1</b>
Safe Harbor	Domestic Violence and Shelter Services	CDBG \$6,000	<b>SL-1 CD-1</b>
Family Service Association	Provide budget counseling services to minimize the number of foreclosures	CDBG \$6,240	<b>SL-1</b>
Sheboygan County Interfaith Organization	Continue to operate the Bridgeway and Beyond transitional living shelter.	CDBG \$3,900	<b>SL-1 CD-1</b>
Salvation Army	Operate Emergency Lodge, providing housing, resources, and skills to homeless	CDBG \$25,637	<b>SL-1 CD-1</b>
Habitat for Humanity	Operate A Brush With Kindness, revitalizing LMI neighborhoods	CDBG \$5,850	<b>SL-1 SL-2 DH-2 SL2 DH-1</b>
Lakeshore Community Action Program	Operate Sheboygan Emergency Housing Coordinated Intake, preventing homelessness	CDBG \$25,637	<b>SL-1 CD-1</b>
Lakeshore Community Center	Provide affordable health care, medication, transportation and interpretation for patients	CDBG \$3,900	<b>SL-1 SL-2 CD-6</b>

Tee Box, Inc.	Homeless Shelter for recently released ex-offenders	CDBG	\$2,800	<b>SL-1 CD-1</b>
<b>Economic Development</b>				
City of Sheboygan	Business Development Loan Program	CDBG	RLF	<b>EO-1 CD-5</b>
<b>Neighborhood Revitalization/Other</b>				
City of Sheboygan	NRSA Neighborhood Officers		\$30,000	<b>SL-1</b>
<b>Administration</b>				
City of Sheboygan	CDBG Administration Fair Housing Activities	CDBG	\$164,605	

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

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

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

The City of Sheboygan covers an area of nearly 15 square miles and is situated along Lake Michigan between Milwaukee and Green Bay metropolitan areas.

During the next calendar year, assistance will be directed to Census Tracts 2, 5, & 8 per the 2000 census data. These census tracts have the highest concentrations of low to moderate income persons and non-white individuals per the 2000 Census. Census Tract 2 is located north of STH 23 and east of STH 28 in the northeastern portion of the City. Census Tract 5 is located north of STH 23 and Census Tract 8 is located in the heart of the City of Sheboygan and is bordered by S. 14<sup>th</sup> Street on the west, Lake Michigan on the east, and the Sheboygan River on the north.

The City's Neighborhood Revitalization Strategy Area (NRSA), which includes Census Tracts 5 & 8, is a key area where funds will be expended pending on a locally targeted basis. This area is generally recognized as one of the City's most challenged neighborhoods in terms of unemployment, crime, housing quality, and economic status.

The City of Sheboygan intends to concentrate resources that benefit existing residents in the CDBG eligible areas where the highest concentration of low and moderate income households live (Census Tracts 2, 5 & 8). For affordable rental, homeownership projects, and public service programs, we will support projects in all parts of the City. Sheboygan supports the even distribution of CDBG funded activities throughout the neighborhoods of the City that demonstrates need and where opportunities to increase the affordable housing stock exist.

A primary obstacle to meeting the under-served needs in the City of Sheboygan is the lack of available funding to the City and to the various non-profit agencies the City partners within serving the low and moderate income residents of Sheboygan. As entitlement grants shrink, the cost of delivering services and completing projects increases, and the economy continues to be challenging; the need is greater this year for these funds. It was a particularly difficult year for the Common Council and its standing committees to make critical decisions as to where the funds should be spent.

Another obstacle we are facing in meeting under-served needs is the challenging market and consumer credit environment for housing. It is complicated by the tightening of credit reductions and loss of revenue for community and government housing agencies. These reductions have generated more agency and end user caution in undertaking and financing home improvements and development, and have especially impacted the initiation of new projects. Focus group participants also identified the lack of solid information about available housing programs, the implementation of new International building code regulations at the State level, and the rising cost of property insurance as additional barriers to housing development or improvement.

The available funding was allocated based on criteria that include the national objectives and items, such as; income verification to confirm that the users are LMI, what the percent of CDBG dollars vs. the applicants overall budget, and whether the activity is addressing a need in the community. Maintaining the housing stock in older LMI areas is a top priority, as well as providing other social/public services to LMI families in need during these difficult economic times.

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

*\*If not using the CPMP Tool: Complete and submit Table 3B Annual Housing Completion Goals.*

*\*If using the CPMP Tool: Complete and submit the Table 3B Annual Housing Completion Goals.*

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

The City of Sheboygan does not fund activities that meet the requirements for affordable housing defined in 24 CFR 92.252 or 24 CFR 92.254.

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

*14. Describe the manner in which the plan of the jurisdiction will help address the needs of public housing and activities it will undertake during the next year to encourage public housing residents to become more involved in management and participate in homeownership.*

*15. If the public housing agency is designated as "troubled" by HUD or otherwise is performing poorly, the jurisdiction shall describe the manner in which it will provide financial or other assistance in improving its operations to remove such designation during the next year.*

The City of Sheboygan and Sheboygan Housing Authority will continue to work in cooperation with Habitat for Humanity on a homeownership program and Partners for Community Development. The program encourages interested parties to enroll with Habitat for Humanity, complete required service hours, build a new home, finance the home, and provide down payment assistance with a reasonable mortgage amount.

The Sheboygan Housing Authority is not considered a troubled agency by HUD.

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

*16. Describe, briefly, the jurisdiction's plan for the investment and use of available resources and describe the specific planned action steps it will take over the next year aimed at eliminating chronic homelessness.*

*17. Describe specific action steps to address the needs of persons that are not homeless identified in accordance with 91.215(e).*

*18. Homelessness Prevention—Describe planned action steps over the next year to address the individual and families with children at imminent risk of becoming homeless.*

Projects funded through the City of Sheboygan will assist with Homeless Prevention elements. Projects include maintaining and enhancing services and facilities to homeless individuals and families, emergency shelters, case management and supportive services for single woman and outreach.

The city works with agencies like the Salvation Army and their programs to include the elderly and persons with disabilities, Safe Harbor which operates a shelter for domestic abuse victims, and Sheboygan County Interfaith Organizations that provides a shelter for single moms looking for work. The City funds these activities with CDBG funds.

The City of Sheboygan addresses homelessness by their continued work with agencies such as the Salvation Army. The Sheboygan Salvation Army just completed an expansion project that provides 45 beds at the homeless shelter.

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

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

The City of Sheboygan completed updates to the Analysis of Impediments and submitted a copy to HUD in September 2012.

<b>Recommendation</b>	<b>Proposed Action Plan</b>	<b>Proposed Timeline</b>	<b>Completion</b>
<b>#1:</b> Review and Amend Sheboygan’s Fair Housing Ordinance	Research necessary changes and make recommendations to the Common Council to amend the ordinance	3 <sup>rd</sup> Quarter of 2013	Completed in September 2013
<b>#2:</b> Devote resources to a review of Section 15.26 Community Living Arrangements	Review of current zoning language in terms of future legal implications	End of 2015	
<b>#3:</b> Facilitate the production of affordable and accessible housing units	Development of the Affordable/Accessible Housing Production Task Force, implement Housing Rehab Programs, fund agencies to fund disability improvements	Ongoing	2013: The City continues to provide funding for the Housing Rehab Program and funds Rebuilding Together that provides funds for construction of accessibility improvements.

#4: Increase education and outreach about fair housing issues and resources	Research and encourage fair housing service providers, increase knowledge of fair housing rights, etc. Establish a clearly defined City discrimination process	The City plans to hold a city-wide Fair Housing Seminar for interested landlords and residents during the Summer 2014.	
#5: Fund post-purchase counseling	Fund post purchase counseling by a viable homebuyer counseling agency	2013-2014-2015	The City is proposing to provide funding to Partners for Community Development to fund post purchase counseling.
#6: Advocate for changes in State and Federal Programs to expand Affordable Housing Options	Organize meetings with legislators to discuss the adverse impacts of recent HUD actions	Ongoing	
#7: Advocate for Open and Inclusive Real Estate and Rental Markets	Initiate regular training of members of various groups on fair housing laws, procedures, etc.	The City of Sheboygan completes this yearly as part of the City's Landlord Training Program	The 2014 session was held on April 22, 2014.
#8: Improve access of minority and low-income applicants to home mortgages.	Housing Counseling services to LMI persons, locating offers in lower income neighborhoods	2014-15	The City is proposing to provide funding to Family Service Assoc. that provides housing purchasing education.

**Other Actions 91.220(k)**

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

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

One of the major obstacles to meeting under-served needs is the challenging market and consumer credit environment for housing. It is complicated by the tightening of credit reductions and loss of revenue for community and government housing agencies. These reductions have generated more agency and end user caution in undertaking and financing home improvements and development, and have especially impacted the initiation of new projects. Focus group participants also identified the lack of solid information about available housing programs, the implementation of new International building code regulations at the State level, and the rising cost of property insurance as additional barriers to housing development or improvement.

The City's housing rehabilitation program has integrated lead paint remediation into every application funded where lead paint has been found. The City hires consultants to complete lead risk assessments at each eligible home. The 2010 Lead Hazard Reduction Grant from HUD is ending in May 2014. The City intends to apply for a another three year grant once the NOFA is released.

The City's antipoverty strategy is based on attracting a range of businesses and providing workforce development in cooperation with the Sheboygan County Chamber of Commerce, Sheboygan County Economic Development Corporation, area colleges, and technical colleges. The strategy includes job training services, as well as, supportive services to low income residents.

Also, the City supports efforts of the local entrepreneur partners which work with low to moderate income individuals interested in starting a new business.

The Department of Planning and Development will work with the City Engineering Division, Sheboygan Redevelopment Authority, City Building Inspections Division, and the City's Finance Department to coordinate and enhance the services provided by this funding and to maximize the impact on the community. The Department of Planning and Development Department and the Finance Department will continue to work together to review the process used in the IDIS system along with updating and addition documentation. The Department of Planning and Development will be inputting the beneficiary data.

The major strength in this delivery system is that the City public service organizations, housing agencies, and City Departments operate in a small geographic environment. As a result of this, communication and coordination between organizations is relatively easy. Gaps in delivery of services in Sheboygan are not related to institutional issues but rather in insufficient funding.

## PROGRAM SPECIFIC REQUIREMENTS

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

1. *Identify program income expected to be received during the program year, including:*
  - *amount expected to be generated by and deposited to revolving loan funds;*
  - *total amount expected to be received from each new float funded activity included in this plan;*  
*and*
  - *amount expected to be received during the current program year from a float funded activity described in a prior statement or plan.*

The City of Sheboygan estimates that approximately \$194,160.82 will be available in program income into the Economic Development revolving loan fund and \$67,975.29 into the Housing revolving loan program.

2. *Program income received in the preceding program year that has not been included in a statement or plan.*

The City does not have any float funded activities.

3. *Proceeds from Section 108 loan guarantees that will be used during the year to address the priority needs and specific objectives identified in its strategic plan.*

The City of Sheboygan does not have a Section 108 payment due yearly.

4. *Surplus funds from any urban renewal settlement for community development and housing activities.*

The City of Sheboygan does not have surplus funds from an urban renewal settlement.

5. *Any grant funds returned to the line of credit for which the planned use has not been included in a prior statement or plan.*

No grant funds were returned to the line of credit which the planned use has not been included in a prior plan submittal.

6. *Income from float-funded activities.*

No float-funded activities are expected to be received from previous plans or statements.

7. *Urgent need activities, only if the jurisdiction certifies.*

The City of Sheboygan does not have any “urgent need” activities.

8. *Estimated amount of CDBG funds that will be used for activities that benefit persons of low- and moderate income.*

On a yearly basis, the City of Sheboygan typically spends about 90% or higher on activities that benefit low to moderate income persons.

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

1. *If a participating jurisdiction intends to use forms of investment other than those described in 24 CFR 92.205(b), describe these forms of investment.*
2. *If grantee (PJ) plans to use HOME funds to refinance existing debt secured by multifamily housing that is being rehabilitated with HOME funds, state its refinancing guidelines required under 24 CFR 92.206(b).*
3. *Resale Provisions -- For homeownership activities, describe its resale or recapture guidelines that ensure the affordability of units acquired with HOME funds? See 24 CFR 92.254(a)(4).*

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

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

5. *Describe the policy and procedures it will follow to affirmatively market housing containing five or more HOME-assisted units.*
6. *Describe actions taken to establish and oversee a minority outreach program within its jurisdiction to ensure inclusion, to the maximum extent possible, of minority and women, and entities owned by minorities and women, including without limitation, real estate firms, construction firms, appraisal firms, management firms, financial institutions, investment banking firms, underwriters, accountants, and providers of legal services, in all contracts, entered into by the participating jurisdiction with such persons or entities, public and private, in order to facilitate the activities of the participating jurisdiction to provide affordable housing under the HOME program or any other Federal housing law applicable to such jurisdiction.*
7. *If the PJ will receive American Dream Downpayment Initiative (ADDI) funds, describe:*
  - a. *Planned use of the ADDI funds.*

- b. *Plan for conducting targeted outreach to residents and tenants of public housing and manufactured housing and to other families assisted by public housing agencies, for the purposes of ensuring that the ADDI funds are used to provide down payment assistance for such persons.*
- c. *Actions to be taken to ensure the suitability of families receiving ADDI funds to undertake and maintain homeownership, such as provision of housing counseling to homebuyers.*

The City of Sheboygan does not receive HOME funds.

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

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

The City of Sheboygan does not receive HOPWA funds.

**OTHER NARRATIVES AND ATTACHMENTS**

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