



City of Palm Beach Gardens



Community Development Block Grant FY 18-19 CONSOLIDATED ANNUAL PERFORMANCE & EVALUATION REPORT (CAPER)

December 5, 2019

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Executive Summary

The City of Palm Beach Gardens (City) is a fourth-year entitlement community with the US Department of Housing and Urban Development (HUD) for Community Development Block Grant (CDBG) formula grants. In August of 2015, the City's first 5-year Consolidated Plan and FY 15 Annual Action Plan were submitted to HUD and accepted. In December of 2015, the City's Analysis of Impediments to Fair Housing was submitted to HUD, and accepted. The City's primary goal as identified in the City's Consolidated Plan is to maintain the City's affordable housing stock, and the objective was to rehabilitate owner occupied single-family households. The Consolidated Plan is carried out through the annual Action Plans which provide a concise summary of the actions, activities and specific resources that will be used each year to development string and sustainable communities. The Action Plan is developed under HUD guidelines and serves as the City's application for the Community Development Block Grant.

At the end of each Fiscal Year (FY), the City must also prepare a Consolidated Annual Performance Evaluation Report (CAPER). This report must be submitted to HUD within 90 days after the close of the program year and includes information on the programmatic accomplishments under various grant programs. The CAPER also contains information relevant to the households assisted (including income, racial and ethnic composition), actions taken to further fair housing, and how the jurisdiction's actions and performance align with the City's overall strategic plan.

The City of Palm Beach Gardens submits this Program Year (PY) 2018-2019 CAPER. This CAPER reports on specific goals and objectives based on the strategies outlined in the FY 2018-2019 Action Plan. As stated previously, Program Year 2018-2019 represented the City of Palm Beach Gardens' fourth year as a CDBG entitlement jurisdiction. It covers the period from October 1, 2018 through September 30, 2019, and identifies the level of progress and accomplishments in meeting priority needs, as established in the City's 2015-2019 Consolidated Plan.

During the year, the City expended \$84,708.83 of funds that were available on rehabilitation for three homes with its Owner-Occupied Residential Rehabilitation Assistance Program, conducted lead-based paint testing and remediation, and used some Administration funds available for technical assistance and to advertise the Program. The City spent the allowable \$2,118.00 (less than 1% of the 20% maximum) of PY 18/19 dollars on Administration. The Owner Occupied Residential Rehabilitation Assistance Program is designed to meet the needs of low-moderate income families living in the City.

A complete draft of this report was made available for a fifteen (15) day public review and comment period beginning December 2, 2019 through December 19, 2019. To encourage citizen participation and solicit feedback, a two-column display advertisement was published on December 5, 2019 in the *Palm Beach Post*, a newspaper of daily general circulation, announcing a 15-day comment period on this Consolidated Annual Performance Evaluation Report which was available for review both in person at City Hall, located at 10500 N. Military Trail, Palm Beach Gardens, Florida 33410, as well as on the City's CDBG webpage on the City's official website,

www.pbgfl.com. The advertisement also included a section in Spanish encouraging members of the limited English proficiency (LEP) public to call and comment about the program.

The City also hosted a Public Hearing on December 19, 2019 to encourage public participation and answer any questions or concerns. Information regarding the public hearing was also including in the advertisement.

The City's goal for PY 18/19, as identified in the City's Consolidated Plan, was to maintain the City's affordable housing stock, and the objective will continue to be to rehabilitate owner occupied single-family housing.

DRAFT FOR COMMENTS

CR-05 - Goals and Outcomes

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

91.520(a)

This CAPER reports on the City's accomplishments in carrying out CDBG-funded activities during Program Year (PY) 2018, (October 1, 2018 – September 30, 2019), the fourth year of the City's 5-year planning period. During PY 2018/2019, the City received a CDBG allocation of \$221,943.00 which was proposed to fund the Owner-Occupied Rehabilitation Assistance Program in order to assist 10 Owner-Occupied homes and to cover program administration expenses. The PY 2018/2019 funds were budgeted as follows: Owner-Occupied Rehabilitation - \$177,555.00 and Administration - \$44,388.00.

In May 2016, the City launched its Owner-Occupied Rehabilitation Assistance Program via public hearing, website announcements, advertising in the City's magazine, word of mouth, etc. During the City's PY 18/19, seven (7) new applications were received, for a total of 29 applications submitted to the City since May of 2016.

Contracts were signed on two (2) homes in PY 18/19. Rehabilitation was completed on three (3) homes, one of which began construction in PY 17. Eleven applications are currently under income eligibility review.

Goal	Category	Source / Amount	Indicator	Unit of Measure	Expected – Strategic Plan	Actual – Strategic Plan	Percent Complete	Expected – Program Year	Actual – Program Year	Percent Complete
Address human service needs	Non-Homeless Special Needs		Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	80	0	0.00%			
Maintain City's affordable housing stock	Affordable Housing	CDBG: \$888,740.00	Homeowner Housing Rehabilitated	Household Housing Unit	50	11	22.00%	10	9	90.00%
Promote economic development	Non-Housing Community Development		Businesses assisted	Businesses Assisted	10	0	0.00%			

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

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

Since the City became an entitlement community, its main focus has been on preserving and extending the life of the existing housing stock and providing financial assistance so that homeowners can repair and afford to stay in their homes.

The City's FY 2015-2019 Consolidated Plan identified housing as its high priority. The Consolidated Plan stated that housing activities will include rehabilitation and repair of residential structures to maintain and improve conditions of dwellings owned and occupied by low-and moderate-income persons in the City. In PY 17/18 the City completed the process of rehabilitation for three (3) homes, reviewing another 11 applications for income eligibility. The City anticipates more applications in the next year due to an increase in marketing and community awareness of the program, as well as resident inquiries from eligible candidates.

CR-10 - Racial and Ethnic composition of families assisted

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

91.520(a)

	CDBG	HOME	HOPWA	ESG
White	3	0	0	0
Black or African American	0	0	0	0
Asian	0	0	0	0
American Indian or American Native	0	0	0	0
Native Hawaiian or Other Pacific Islander	0	0	0	0
Total	3	0	0	0
Hispanic	1	0	0	0
Not Hispanic	2	0	0	0

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

Grantees that receive CDBG funds must maintain data on the extent to which each racial and ethnic group and single-headed households have applied for, participated in, or benefitted from, any program or activity funded in whole or in part with CDBG funds.

The City of Palm Beach Gardens’ Owner-Occupied Residential Assistance Program provides a direct benefit to families to rehabilitate or repair the exterior of their homes. During PY 18/19, two (2) households were determined eligible to participate in the Program. Construction on three (3) homes was completed; additionally, 11 households have applied to the Owner-Occupied Rehabilitation Program and are under income eligibility review.

Table 2 reflects the racial and ethnic data of the nine projects completed as of September 30, 2019. Of the three (3) households completed in the program, all were White, and two were non-Hispanic and female-headed households. One (1) household was a Hispanic household.

CR-15 - Resources and Investments 91.520(a)
Identify Resources made available

Source of Funds	Source	Resources Made Available	Amount Expended During Program Year
CDBG		411,660.96	\$84,708.83
HOME			
HOPWA			
ESG			

Table 3 – Resources Made Available

The City had \$3,616.96 remaining from FY 16 and 186,101.00 remaining from FY 17 that was unexpended for its rehabilitation program. During FY 18/19, the City received an additional \$221,943.00 in CDBG funds available, for a total of \$411,660.96 in terms of resources made available. The City drew from its line of credit of \$84,708.83 of the total available. The expenditures were Administration expenses of \$2,118.00 for the advertising of the Owner-Occupied Residential Rehabilitation Assistance Program and recording fees, and \$82,590.83 for the rehabilitation of three (3) low-to-moderate income owner-occupied residential homes, as well as associated lead-based paint testing, and remediation.

Identify the geographic distribution and location of investments:

There is no specific geographic area within the City to be targeted. The City planned and distributed its funds on a “first-eligible, first-served” basis to low-to-moderate income homes throughout the municipal boundaries of Palm Beach Gardens. The home improvements occur in various, undetermined locations throughout Palm Beach Gardens.

Leveraging:

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

Currently the City works closely with the Solid Waste Authority paint program to provide free paint with the help of volunteers. One of the City’s applicants whose home was completed in PY18 used the Solid Waste Authority paint program and the City’s CAST program to finalize and paint the home when it was completed, and another has been approved and will have their home painted soon. Federal funds will continue to be used to leverage other resources available to extend the level of assistance the City can provide or scope of project that can be undertaken. The City currently does not have any funding source that requires matching. The publicly owned land is not applicable.

CR-20 - Affordable Housing 91.520(b)

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

	One-Year Goal	Actual
Number of Homeless households to be provided affordable housing units	0	0
Number of Non-Homeless households to be provided affordable housing units	10	3
Number of Special-Needs households to be provided affordable housing units	0	0
Total	10	3

Table 4 – Number of Households

	One-Year Goal	Actual
Number of households supported through Rental Assistance	0	0
Number of households supported through The Production of New Units	0	0
Number of households supported through Rehab of Existing Units	10	3
Number of households supported through Acquisition of Existing Units	0	0
Total	10	9

Table 5 – Number of Households Supported

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

In regard to the provision of affordable housing, the City set a goal of providing 10 non-homeless households access to affordable housing units by rehabilitating 10 existing units. During the City's PY 16/17, two (2) homes were entirely completed. In PY 17/18, nine (9) homes were completed. In PY 18/19 three (3) homes were completed, for a total of 14 homes completed. Eleven are currently under income eligibility review.

One of the main challenges for the rehabilitation activity was income eligibility of the applicants. Once the Program was created and available to residents, the City received a lot of interest and phone calls about the program but many of them would not qualify when given the income eligibility requirements. This issue continues. Also, because this is still a fairly new Program for the City, it took a lot of time and effort from staff to become familiar with the various income

eligibility requirements to meet the necessary requirements of the HUD & CDBG Programs. Every household and application that is submitted to the City has unique circumstances and parameters to meet the income eligibility. There was a lull in momentum of applications that were received in the early part of PY 18, however, toward the end the program year it has picked up momentum and four (4) new applications were submitted within a few months. These are currently under review.

Discuss how these outcomes will impact future annual action plans.

The outcome of the PY 2018 activities will impact the allocation of CDBG funds in future annual action plans. Initially, participation in the program was limited. Participation in the Owner-Occupied Residential Rehabilitation Assistance Program has increased significantly. However, the City has realized that despite the amount of outreach, the amount of work required in each home and the lower participation will not result in the accomplishing the goal of 10 homes per year. The City’s Strategic plan and future applications is planned to be amended to identify a goal of assisting 7 homes per year, for a total of 35 households over five years which is in line with the roughly 20,000-25,000 budget that the City would like to keep with for each home in order to achieve a positive benefit.

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

Number of Persons Served	CDBG Actual	HOME Actual
Extremely Low-income	1	0
Low-income	1	0
Moderate-income	1	0
Total	3	0

Table 6 – Number of Persons Served

During PY 18/19, the City has become more familiar with the day-to-day functions of the program. The City currently has 11 households in income eligibility review and is confident the timeliness of the review and completion of projects will increase over the next few years to meet the goals of the 2015-2019 Consolidated Plan.

Provide a summary of the efforts to address “worst case needs”, and progress in meeting the needs of persons with disabilities (CR-20);

The City was approved for and is proceeding with the implementation of an exterior single-family rehabilitation program. This addresses worst case needs by assisting residents that live in substandard housing with conditions such as old, outdated and/or damaged roofs and windows with exterior home hardening.

Describe other actions taken to foster and maintain affordable housing (CR-20);

The City is using its CDBG resources to rehabilitate single family homes, to extend the life of the existing housing stock. Additionally, The City's single-family rehabilitation program fosters affordable housing by repairing and hardening the existing housing stock, facilitating residents staying in their homes, and making necessary repairs affordable. Additionally, the staff has developed a website with a plethora of information and resources regarding housing, and local social services and programs.

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

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

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

The City of Palm Beach Gardens supports Countywide homeless initiatives to help address the housing needs of homeless persons. The City is in communication with Palm Beach County's Homeless and Housing Alliance (HHA) via email and occasionally attends routine meetings in person. The City continues to remain in contact and aware of the endeavors of the HHA via email announcements which, if applicable, are placed on the City's CDBG Resources webpage.

Addressing the emergency shelter and transitional housing needs of homeless persons

The City of Palm Beach Gardens is committed in serving its homeless populations. The City does not currently have any homeless shelters within its City limits but supports countywide homeless initiatives to help address the housing needs of homeless persons.

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

The City of Palm Beach Gardens works with and supports countywide homeless initiatives to help address the housing needs of homeless persons through the Palm Beach County HHA. The City also has the Homeless Coalition of Palm Beach County's website listed as a resource for the public to find for assistance and has supported Coalition through voluntary monetary donations from the City employee morale association, the SPIRIT team.

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

The City of Palm Beach Gardens home repair program will serve to make housing more affordable by providing financial assistance for essential exterior home repair improvements.

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

The City of Palm Beach Gardens does not have any public housing facilities within the jurisdictional boundaries, and therefore relies on and supports the assistance provided by Palm Beach County Housing Authority.

Actions taken to address the needs to public housing

Although, the City does not have any specific actions planned at this time to address any need for public housing during the next year the City will remain in contact with the Palm Beach County Housing Authority and HHA. The City will continue to make continuous efforts to communicate with the agency in the event there is a way the City can assist.

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

At this time, the City does not have any public housing units, but supports Palm Beach County Housing Authority in their efforts to provide public housing for the area, and also supports the goal of homeownership. The City will continue to communicate with the Housing Authority should a direct need be anticipated that the City can assist with. Additionally, the City staff advertises various organizations' workshops and programs on its CDBG webpage. The Urban League of Palm Beach County organization routinely hosts events and the City continues to be available to the organization to spread the word regarding future events hosted by the ULPBC.

Actions taken to provide assistance to troubled PHAs.

The City does not have any public housing; therefore, no PHA has been designated as troubled. Additionally, the Palm Beach County Housing Authority is not considered troubled.

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

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

The City's Comprehensive Plan has a Housing Element. During Program Year 2015, the City reviewed its Comprehensive Plan for the required Evaluation and Appraisal Review (EAR) and along with currently adopted incentives (such as density bonuses and targeted expedited permitting) for affordable and workforce housing, the City added an additional incentive to consider a partial waiver of impact fees for developers of affordable/workforce housing in the City. During PY 18/19, the City used professional service funds available to hire a consultant to complete a Workforce Housing Study and is working on creating and developing a comprehensive workforce housing program in the City.

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

The single-family housing rehabilitation program meets underserved needs by making necessary home repairs affordable, reducing overall cost burden, the number of residents living in inadequate housing, and poverty risk. Lead based paint testing is conducted on every home to identify (and remedy if necessary) any potential lead-based paint hazards.

Actions taken to foster and maintain affordable housing 91.220(k); 91.320(j)

The City's rehabilitation program is designed to enable residents to maintain their housing affordably by providing home repair assistance.

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

Lead-based paint hazards are rare in Palm Beach Gardens since the majority of housing was built in the last thirty years. However, the City did contract with a company that specializes in Lead-based paint testing to test each eligible and applicable home (built prior to 1978). One of the homes completed in PY 18 tested positive for lead-based paint, and abatement procedures and clearance tests were performed to reduce the lead-based paint hazards.

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

No specific actions were taken to reduce the number of poverty-level families, except for the provision of the home rehabilitation program, which may assist poverty-level families and therefore reduces the housing cost burden.

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

City departments are working together to implement the single-family rehabilitation program including the Building Department, Finance Department and Purchasing Department. Additionally, the City is in communication with the Homeless and Housing Alliance of Palm Beach

County, the local Continuum of Care, for awareness and support of the programs they offer.

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

The City has a Resources page on its website which lists various social services and both private and public entities that may help the public find various kinds of assistance. The City continues to reach out and communicate to the public the different avenues of assistance and coordination that are available.

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

As of a part of the development of the Analysis of Impediments, the City of Palm Beach Gardens determined recommendations for actions that can be implemented in federal grant program administration and other local government operations to resolve the identified barriers. These recommended actions to resolve the barriers identified include:

1. Promoting awareness regarding County, State and Federal fair housing laws
 - a. The City has a dedicated Resources webpage on its Community Development Block Grant webpage which promotes the City, County, State and Federal Housing Laws.
2. Reviewing all public policies, such as in the City's Comprehensive Plan, to identify potential barriers to affordable housing.
 - a. During Program Year 2015, the City reviewed its Comprehensive Plan for the required Evaluation and Appraisal Review (EAR) and added an incentive to consider a partial waiver of impact fees for developers of affordable housing in the City. During PY 18/19, the City continued its effort and hired a consultant to complete workforce housing study for analysis and research outside of CDBG funds, in order to continue to use funds to directly benefit residents. The City is working on creating and developing a comprehensive workforce housing incentives program.

CR-40 - Monitoring 91.220 and 91.230

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

The City closely monitors the timely expenditure of CDBG funds through use of several tracking spreadsheets. The City was in full compliance with the timeliness test in PY 18. Reimbursement voucher requests are submitted and reviewed to confirm that all expenses are eligible expenses. The City has a system in place for submitting quarterly financial reports that are reconciled with grant records to ensure the accuracy. A thorough and detailed checklist for each rehabilitation application is used to ensure compliance with income eligibility and general program requirements such as lead based paint testing and mitigation, environmental review, and affordability period monitoring.

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

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

Consistent with the City's adopted Citizen Participation Plan, the City advertised a public hearing meeting and the availability of the draft CAPER in the *Palm Beach Post*, a newspaper of general circulation, on December 2, 2019. An advertisement was also posted at City Hall. The Public Hearing was advertised for December 4, 2019 to encourage public participation. Notice of the hearing and the document's availability was also posted on the City's website. The notice provided instructions to the public about how to retrieve the document online or in person and advised of a 15-day comment period ending on December 16, 2019. No comments were received. A copy of the Public Notice is attached.

CR-45 - CDBG 91.520(c)

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

The City has not implemented any changes to program objectives but may explore other potential projects to benefit City residents in the future.

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

No, the City of Palm Beach Gardens does not have any open BEDI grants