



***City of Elyria, Ohio***

***Consolidated Annual Performance  
and  
Evaluation Report  
for  
PY 2021***

***March 1, 2021 - February 28, 2022***

***Grant #B-21-MC-39-0015; #B-20-MV-39-0015***

***Lead Agency: City of Elyria Office of Community Development  
Contact Person: Ashley Scott, Director  
Telephone: 440-326-1541***

## **CR-05 - Goals and Outcomes**

### **Progress the jurisdiction has made in carrying out its strategic plan and its action plan. 91.520(a)**

This could be an overview that includes major initiatives and highlights that were proposed and executed throughout the program year.

The City of Elyria is an Entitlement Community, which receives CDBG funding directly from HUD. The City's program years runs March 1st-February 28th. All funded activities are designated as priorities in the City's 2020-2024 Consolidated Plan. The City's top priorities in the Consolidated Plan include housing, community development and administration/planning. Other priorities include homelessness, economic development and other special needs. Specifically, in 2021 the City funded administration/planning, housing rehabilitation, code enforcement, public infrastructure improvements in target areas and public service activities. The City also conducted fair housing education and outreach through the disbursement of informational material and trainings and a partnership with the Lorain County Urban League. The City continues to work with social service agencies to address the needs of underserved populations. The City is supporting initiatives for low to moderate income housing through the Lorain Metropolitan Housing Authority, New Sunrise Properties/PIRHL Developers and by means of funding passed through Community Development such as CDBG, CHIP, and ARPA funding.

Three substantial amendments were completed in 2021 to shift unexpended funds to other activities within the CDBG and CDBG-CV programs.

The City anticipated \$30,000 in program income for the 2021 program year. A total of \$9,198 was receipted into IDIS. The difference between anticipated program income and actual program income received meets the \$25,000 recommended threshold set forth by HUD.

The CONPLAN report does not accurately reflect the goals and accomplishments. The City has manually adjusted the actual accomplishments on these tables to accurately reflect the documented beneficiaries. Please refer to the PR03 report for a breakdown of accomplishments for each activity.

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

Categories, priority levels, funding sources and amounts, outcomes/objectives, goal outcome indicators, units of measure, targets, actual

outcomes/outputs, and percentage completed for each of the grantee's program year goals.

Goal	Category	Source / Amount	Indicator	Unit of Measure	Expected Strategic Plan	Actual Strategic Plan	Percent Complete	Expected Program Year	Actual Program Year	Percent Complete
AH - Maintain, Improve, Expand Affordable Housing	Affordable Housing	CDBG: \$	Homeowner Housing Rehabilitated	Household Housing Unit	50	34	68.00%	10	14	140.00%
AH - Maintain, Improve, Expand Affordable Housing	Affordable Housing	CDBG: \$	Housing Code Enforcement/Foreclosed Property Care	Household Housing Unit	22550	437	1.94%	500	143	28.60%
AH - Maintain, Improve, Expand Affordable Housing	Affordable Housing	CDBG: \$	Other	Other	5000	0	0.00%			
AM - Planning and Program Administration	Administration	CDBG: \$ / CDBG-CV: \$	Other	Other	1	0	0.00%	53757	0	0.00%
ED - Increase Economic Opportunities	Non-Housing Community Development	CDBG: \$ / CDBG-CV: \$	Facade treatment/business building rehabilitation	Business	0	0		0	0	

ED - Increase Economic Opportunities	Non-Housing Community Development	CDBG: \$ / CDBG-CV: \$	Jobs created/retained	Jobs	0	2		0	2	
ED - Increase Economic Opportunities	Non-Housing Community Development	CDBG: \$ / CDBG-CV: \$	Businesses assisted	Businesses Assisted	5	2	40.00%	0	2	
ED - Increase Economic Opportunities	Non-Housing Community Development	CDBG: \$ / CDBG-CV: \$	Other	Other	1	0	0.00%			
PS - Provide Needed Public Services	Homeless Non-Homeless Special Needs	CDBG: \$ / CDBG-CV: \$	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	28600	410	1.43%	500	410	82.00%
RN - Revitalize Neighborhoods	Non-Housing Community Development	CDBG: \$	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	Persons Assisted	28600	0	0.00%			
RN - Revitalize Neighborhoods	Non-Housing Community Development	CDBG: \$	Public Facility or Infrastructure Activities for Low/Moderate Income Housing Benefit	Households Assisted	0	0		0	0	

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

Assess how the jurisdiction's use of funds, particularly CDBG, addresses the priorities and specific objectives identified in the plan,

**giving special attention to the highest priority activities identified.**

The over-riding objective and strategy in the Consolidated Plan is to address and assist low-moderate income individuals. The City allocated PY 2021 funds based on activities that benefit this targeted group. Public facility improvements were completed in low-moderate income areas as well as areas that have been designated as "blighted." The low-moderate income areas consist of populations that are over 51% low-moderate income. Housing rehabilitation through the City's home repair program provides low-moderate income residents with sanitary, safe and decent housing. Code enforcement efforts are conducted in areas that meet the low-moderate income criteria, are deteriorating and have additional efforts in progress to help arrest further decline. Public service activities were provided to social service agencies that primarily serve low-moderate income persons. The City also provided Fair Housing education, outreach and training in partnership with the Lorain County Urban League.

The City received additional CDBG funds through the CARES Act in PY2020. The activities were to prepare, prevent and/or respond to Covid-19. Public service activities including, but not limited to, food banks, technology and subsistence payments which further aligned with the strategic plan goal of providing needed public services. CDBG-CV funds were also set aside to assist business. During the 2021 program year, two businesses were assisted and additional public service activities were funded to address the effects of Covid-19.

## CR-10 - Racial and Ethnic composition of families assisted

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

91.520(a)

	CDBG
White	1,594
Black or African American	887
Asian	13
American Indian or American Native	13
Native Hawaiian or Other Pacific Islander	7
<b>Total</b>	<b>2,514</b>
Hispanic	50
Not Hispanic	2,464

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

### Narrative

The composition of persons served by CDBG funds in the 2021 program year is retrieved from a HUD performance reporting module. The table above does not include all reported racial and ethnic status of families assisted.

The actual composition levels, by activity, are indicated in the attached PR03 report.

## CR-15 - Resources and Investments 91.520(a)

### Identify the resources made available

Source of Funds	Source	Resources Made Available	Amount Expended During Program Year
CDBG	public - federal	766,751	658,716
Other	public - federal	261,437	244,980

Table 3 - Resources Made Available

### Narrative

The Resources Made Available table indicates Entitlement grants the City received in program year 2021. The CR-15 "Resources made available" cell appears to under report the funds available for the 2021 program year. The actual amount of funds available for the program year total \$2,102,457.20. The total funds expended for the program year are \$903,695.26. This amount reflects PY2021 CDBG funds, prior year carryover, program income and CDBG-CV dollars.

In addition to the expended amount listed above, the City expended \$205,510 in Community Housing Impact & Preservation Program funds. The Community Housing Impact & Preservation Program passes through the State of Ohio and provides private owner rehabilitation to households at or below 80% of the AMI. The City applied for and received an additional \$250,000 in CHIP dollars during the program year.

### Identify the geographic distribution and location of investments

Target Area	Planned Percentage of Allocation	Actual Percentage of Allocation	Narrative Description
CDBG Target Area		15	
City-wide		51	

Table 4 – Identify the geographic distribution and location of investments

### Narrative

Geographic distribution of funding is shown by activity in the PR-03 report. The City budgeted funds for the 2021 program year for activities that occurred in targeted, LMI areas. The amount budgeted includes \$499,314 in 2021 funds and prior year carryover. A total of \$210,678 funds were expended in targeted areas. An additional \$199,238 was encumbered for a public facility improvement. Public facility improvements and code enforcement activities were calculated in this total. There were additional public service activities in target areas, however, they served LMI persons city-wide, not only in the specific area.

Most of the City's programs are based on an individual applicant meeting the eligibility criteria through the Housing Rehabilitation and Public Service activities. Those persons benefitting are city-wide; however, the public service activities are located in low-moderate income areas that principally serve persons residing in the area or within close proximity. The LMI areas are determined by the most recent census data. Public facility improvements were carried out in LMI census tracts as well as a designated slum & blight area that is also LMI. The percentages provided in the table for the target areas include the downtown district, census tract 708, South Park, census tract 714 and code enforcement in various LMI census tracts. The percentage listed under the City-wide category reflects activities that are determined on an individual rather than a target area basis.

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## 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.**

Federal funds were leveraged in 2021 with additional resources to provide a larger impact on the community. Specifically, CDBG funds were utilized in the Community Housing Impact & Preservation program to assist with soft costs associated with owner rehabilitation. Further, CDBG funds were used for fair housing activities in the CHIP program. Community Development staff will attend local events and provide community outreach to affirmatively further fair housing efforts. The City completed a substantial amendment during the program year to contract with the Lorain County Urban League for additional fair housing training in the community, outreach and support.

The City leveraged \$4,706 in CDBG funds for the 2019 CHIP program year.

The City also assisted the local housing authority by providing organizational support. A new affordable housing project, Bridge Pointe Commons, began construction in 2020. The project will provide 62 unit residential affordable housing units with enriched services for individuals struggling with homelessness. The support of local agencies that assist with homeless and other special needs activities support the Consolidated Plan goals and objectives. The project is near completion.

Lastly, the City worked with New Sunrise properties to encourage and support the development of proposed affordable senior housing located in a Community Reinvestment Area. The agency is able to utilize this support on applications for funding. New Sunrise & PIRHL Developers were notified in 2017 the funding application submitted to OHFA was approved. Construction was completed in 2021.

## 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	14
Number of Special-Needs households to be provided affordable housing units	0	0
<b>Total</b>	<b>10</b>	<b>14</b>

Table 5 – 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	14
Number of households supported through Acquisition of Existing Units	0	0
<b>Total</b>	<b>10</b>	<b>14</b>

Table 6 – Number of Households Supported

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

The City completed the rehabilitation of 14 owner occupied housing units through the CDBG program in 2021. The home repair program will correct one-two health or safety hazards to owner-occupied single family structures. The City also participated in the CHIP program (funds were awarded in 2019). The CHIP program provides full rehabilitation to owner-occupied single family homes with multiple health/safety/code issues that need to be addressed. Since the inception of the 2019 CHIP funding, the City completed nine private owner rehabilitations and has additional rehabs in process. The

City surpassed its benchmark for the 2021 program year. In 2018, the income limits were raised from 50% to 80% to reach out to more households. Since the increase, the program is exceeding goals on an annual basis.

### **Discuss how these outcomes will impact future annual action plans.**

The City recognizes there is a need for safe, decent, affordable housing. The City will continue to fund rehabilitation activities with CDBG and continue to apply for grants that address housing stock in the community.

The program historically assists a minimum of ten (10) single family homes each grant cycle. As a result of expanding the income limits, it is expected the minimum anticipated amount of home repairs may be increased in future plans.

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

Number of Households Served	CDBG Actual	HOME Actual
Extremely Low-income	3	0
Low-income	4	0
Moderate-income	7	0
<b>Total</b>	<b>14</b>	<b>0</b>

**Table 7 – Number of Households Served**

### **Narrative Information**

The City expended \$263,792.75 of CDBG funds on the housing rehabilitation activity in the 2021 program year.

## **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**

Although homelessness is a priority in the Consolidated Plan, it is listed as a lower priority and may not be specifically funded with CDBG. However, the City has a commitment to assist with homeless needs primarily served through social service organizations and the local housing authority. The local Continuum of Care system is comprised of three essential elements along with a prevention strategy. The three elements are Emergency shelter/assessment, Transitional Housing with social services, and permanent supportive housing. The City does not receive funding directly for these services; however, the various agencies represented in the local CoC continue to address homelessness and reach out to those affected.

### **Addressing the emergency shelter and transitional housing needs of homeless persons**

The Lorain County Homeless Task Force includes representatives from various continuum of care agencies. The group reviews funding opportunities and communicates homeless needs not only to Elyria, but the County as a whole. The City will provide support to various agencies through application planning and other coordination efforts as requested. Regular meetings, point-in-time counts, housing and supportive committees as well as advocacy are utilized to help support need. The City authorized programming with ARPA dollars to assist non-profits respond to Covid and/or the harmful consequences of the economic disruptions resulting from or exacerbated by Covid. Eligible uses include, but are not limited to the following: Expenses to facilitate internet access or digital literacy assistance, Expenses associated with the provision of economic support in connection with the COVID-19 public health emergency; Services to address homelessness such as supportive housing, and to improve access to stable, affordable housing among unhoused individuals, New or enhanced behavioral health services exacerbated by the pandemic and respond to other public health impacts. These services may include mental health treatment, substance misuse treatment, other behavioral health services, hotlines or warmlines, crisis intervention, overdose prevention, infectious disease prevention, and services or outreach to promote access to physical or behavioral health primary care and preventative medicine; New or expanded high-quality childcare to provide safe and supportive care for children.

### **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 assists individuals with preventing homelessness by providing an emergency home repair program on an annual basis. The program offers assistance for the repair or replacement of items such as heat, roofs, broken water lines, hazardous electrical conditions, ADA modifications or other health or safety needs that need to be addressed to keep an individual in their home.

In 2021, additional CDBG funds were provided to respond to the Covid-19 pandemic. As a result of the pandemic, many households were experiencing difficulty with making utility and rent/mortgage payments. A portion of the CDBG-CV funds were used to assist individuals in need of subsistence payments. Further, the City received ARPA funding and allocated \$1,000,000 to Essential Services. This activity will provide funding to non-profit organizations. Eligible uses include, but are not limited to the following: Expenses for food delivery to residents, including, for example, senior citizens and other vulnerable populations, to enable compliance with COVID-19 public health precautions; Employment and training programs necessary due to the public health emergency; program to assist individuals with payment of overdue rent or mortgage payments to avoid eviction or foreclosure or unforeseen financial costs for funerals and other emergency individual needs

**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**

Elyria supports various agencies that provide assistance to helping homeless persons. Fair housing information and training is provided to persons upon request of agencies and/or individuals. The City also reviews plans such as the housing authority's five year plan to certify consistency with Elyria's goals and objectives. Resources are shared among multiple agencies to provide assistance to individuals.

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

### **Actions taken to address the needs of public housing**

The City of Elyria provided the Lorain Metropolitan Housing Authority with information on the Consolidated Plan process and they requested our input on their planning efforts. The local housing authority was a member of the City's 5 year Consolidated Planning efforts. The City assisted the HA with review of their 5 year Capitol Loan Fund Program and determined its compatibility with the City's 5 year Consolidated Plan. The City works with LMHA to provide safe, affordable housing in the City limits and is willing to provide scattered sites for housing development by means of NSP landbanked properties.

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

The City supports LMHA's efforts to increase management and efforts of public housing residents to participate in homeownership. LMHA continually receives feedback from participants in the programs in an effort to improve programming. LMHA maintains an HCV program (homeownership program). As the need arises, LMHA and the City will collaborate on funding sources. Further, LMHA works to improve outreach to residents regarding the Section 3 program and establish job creation goals for participants to increase employment.

### **Actions taken to provide assistance to troubled PHAs**

The Lorain Metropolitan Housing Authority is not considered a "troubled" PHA.

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

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

The City continually reviews local ordinances and practices that may have negative effects or serve as barriers to affordable housing such as zoning, building codes, fees, etc... In program year 2016, the City passed a resolution authorizing the Mayor & City Engineer to pursue noise abatement by the Ohio Turnpike. An ordinance was passed for a local CRA district to allow the new construction of low income senior housing. Fees schedules are reviewed and amended accordingly.

City Council authorized an issuance of a RFP to seek a qualified consulting firm during the program year to complete a comprehensive land use plan and zoning code update.

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

The City of Elyria supports affordable housing programs, including rental projects that utilize the federal Low Income Housing Tax Credit Program. As stated above, the City amended a local CRA ordinance to allow for New Sunrise Properties to construct a housing development for senior citizens in which funding was received through OHFA in 2017. The City also removed building permit fees for the project to alleviate additional cost. The project began construction in 2018.

Bridge Point Commons, a 62-unit affordable, service enriched housing began construction in 2020. The local housing authority will provide program-based vouchers to the residents.

The City also continues to review property through its Neighborhood Stabilization Program Committee and determine if particular properties in foreclosure can be used for future redevelopment. The elimination of blight in underserved areas will help to stabilize the community and further address health and safety hazards in target areas.

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

In an effort to reduce lead-based paint hazards, the City provides recipients of home repair and rehabilitation funds literature to educate homeowners on the risks of lead based paint and how to help

remediate problems. Further, the City follows all local, state, and federal regulations to address LBP, when applicable, with repairs/rehabs to homes. The Lorain County Health District also follows up on properties that have known hazards. The Community Development Department also makes available to all residents LBP literature, including but not limited to, distributing flyers/brochures at local events, throughout City Hall and to all subrecipients to have available to their clientele.

The City conducts lead-risk assessments on all CHIP projects. Should a report identify lead, the lead will be addressed in accordance with applicable laws.

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

In addition to direct assistance to low-moderate income households, on an annual basis, the City reaches out to local non-profits and social service agencies to apply for CDBG funds through a competitive process. The City allocates a portion of the CDBG funds to agencies that provide services to low income persons. Through public service activities that serve the youth and disabled, families are provided assistance that encourage growth and development. In 2021, funds were provided for child care and programming.

Employment training was also provided to residents who lost employment or could not obtain employment as a result of Covid-19. A collaborative effort was also conducted with CDBG-CV funds to help reduce the technological divide many people experience. The program was successful for participants and will continue into the 2022 calendar year.

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

Most current "gaps" in the institutional structure stem primarily from inadequate funding and staff resources at local agencies. The City of Elyria cannot address these types of problems.

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

Overall, existing housing, social service, mental, and other health care resources are well used and coordinated. This is in part due to the size and capacity of the City of Elyria and Lorain County. We are small enough that communication and referrals do take place. Umbrella groups have provided an opportunity to meet and educate one another on our prospective programs.



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

**Zoning & Site Selection:** In 2021, the City continued to support the Cottages at Riverview. The Cottages at Riverview is an affordable housing development that includes mixed income. PIRHL Developers and New Sunrise, a 501 (c) 3, applied for Ohio Housing Trust Fund Tax Credits. Unfortunately, the project was not awarded funding in 2016; however, they reapplied for the 2017 calendar year and ultimately were awarded funding. As a result, the City worked with the non-profit and developer to amend the Community Reinvestment Area agreement to allow more time for project commencement and wrote letters of support to various agencies. The project site is located near the Downtown area which is undergoing multiple infrastructure improvements as part of a revitalization effort. **Neighborhood Revitalization:** As noted in the report, the City adopted a plan in 2015 for economic development. As part of the economic development plan, the City intended to focus on prioritizing Middle Ave. improvements, increase resident involvement, decrease crime and prioritize youth activities. In 2016, the City completed the Middle Ave. project which involved the reconstruction the roadway, curb ramps, median and lighting. Improvements were continually being assessed for the area in 2021. Activities for the youth, at risk groups, neighborhood sidewalks and infrastructure in the LMI areas were prioritized during the 2021 CDBG citizen participation process, which occurred in 2020 as well as during the 2022 citizen participation process, which occurred in 2021. **Municipal & Other Services Employment-Transportation-Housing Linkage: Sale of subsidized Housing & possible displacement:** Relocation did not occur in 2021. The City abides by the Uniform Relocation Act & Real Property Policies Act. Community Development staff worked with LCCAA and other municipalities at a homebuyer training education course where information was presented on fair housing, landlord/tenant law and lending practices. The Community Action Agency provides homebuyer education courses to tenants as part of an effort to assist with homeownership. **Planning & Zoning Boards:** The City continually reviews its planning and zoning ordinances to maintain compliance with the Fair Housing Act. **Building Codes:** The City has adopted and abides by the latest State Building and Property Maintenance Codes.

Community Development receives fair housing/landlord tenant calls and documents the information on a database. Fair housing information is provided to local non-profits and social service agencies for clients. Fair housing information is also provided to all persons receiving assistance through Community Development Department and distributed at various locations throughout City Hall. The City typically provides Fair Housing trainings throughout the year as well as distributes informational material to the general public and at-risk persons. Unfortunately, due to the pandemic, trainings were not consistently held. In response, a substantial amendment was completed during the 2020 program year to increase fair housing training efforts in collaboration with the Lorain County Urban League. The effort will continue into the 2022 program year.

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## **CR-40 - Monitoring 91.220 and 91.230**

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

The City recognizes that monitoring of the activities carried out in this plan must be completed on a regular basis in order to ensure statutory and regulatory requirements are being met. Further, it is critical to confirm that information being reported to HUD through such mechanisms as IDIS is correct and complete. The Office of Community Development prepared all performance reports and performed monitoring in 2020. Subrecipients of CDBG funds are monitored through receipt of invoices and supporting documentation. The Community Development Department evaluates through quarterly reports, beneficiary forms, and various supporting documents that subrecipients are carrying out activities as described. The monitoring is as follows:

Actions to Be Taken to Monitor Performance and Steps/Actions to Ensure Compliance and Timeliness:

- The City performs a monitoring visit during the program year and at close out. Due to the pandemic, on-site monitorings did not occur in 2020. Desktop monitorings are scheduled in 2021.
- The IDIS system will be updated annually.
- The City of Elyria maintains complete and accurate program and financial records for its CDBG and CHIP programs in compliance with audit and monitoring requirements. Internal CDBG and CHIP financial records are updated on a monthly basis to monitor expenditure levels and progress.
- The Consolidated Annual Performance and Evaluation Report (CAPER) is prepared annually for HUD review of the CDBG program. This is also used to monitor progress on strategies in both the one-year and five-year plans. The CAPER will be made available to the public. These reports will assist in determining whether or not changes need to be made in the Five-Year Plan and in the development of the one-year updates. As required, timeliness on draw-downs is checked two months prior to the end of the program year.

Subrecipient Monitoring Procedures:

- The City will require that all subrecipients submit full documentation (copies of invoices paid, time sheets, checks, etc.) for all transactions for which they request reimbursement. This will provide the City with a complete set of records in its office rather than a random sampling.
- Each subrecipient will be monitored on-site every year to verify that the documentation submitted for reimbursement are true copies of original records, and that the activities funded are actually underway. The subrecipient will be notified in advance of the monitoring visit.
- Subrecipients will be required to submit an annual report to the City on their programs,

- providing data and information on successes, problems, etc. and financial information.
- The City may randomly confirm financial documentation with banks and vendors such as statements and invoices.
  - Subrecipients will be required to complete the City's "Subrecipient Monitoring Questionnaire" to confirm that internal monitoring and controls are in place.

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

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

The City makes performance reports available to citizens. The CAPER is advertised in local media sources and is available for public viewing on the City's website and at City Hall. The City allows an estimated 15-30 days for public comment prior to the submission of the CAPER to allow adequate time for review and comment. The performance report monitoring report received from HUD after the CAPER submission is presented at the first public hearing for the following CDBG program year.

#### **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.**

N/A

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

No

**[BEDI grantees] Describe accomplishments and program outcomes during the last year.**

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**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.**

N/A

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

No

**[BEDI grantees] Describe accomplishments and program outcomes during the last year.**

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## CR-58 – Section 3

Identify the number of individuals assisted and the types of assistance provided

Total Labor Hours	CDBG	HOME	ESG	HOPWA	HTF
Total Number of Activities	0	0	0	0	0
Total Labor Hours					
Total Section 3 Worker Hours					
Total Targeted Section 3 Worker Hours					

Table 8 – Total Labor Hours

Qualitative Efforts - Number of Activities by Program	CDBG	HOME	ESG	HOPWA	HTF
Outreach efforts to generate job applicants who are Public Housing Targeted Workers					
Outreach efforts to generate job applicants who are Other Funding Targeted Workers.					
Direct, on-the job training (including apprenticeships).					
Indirect training such as arranging for, contracting for, or paying tuition for, off-site training.					
Technical assistance to help Section 3 workers compete for jobs (e.g., resume assistance, coaching).					
Outreach efforts to identify and secure bids from Section 3 business concerns.					
Technical assistance to help Section 3 business concerns understand and bid on contracts.					
Division of contracts into smaller jobs to facilitate participation by Section 3 business concerns.					
Provided or connected residents with assistance in seeking employment including: drafting resumes, preparing for interviews, finding job opportunities, connecting residents to job placement services.					
Held one or more job fairs.					
Provided or connected residents with supportive services that can provide direct services or referrals.					
Provided or connected residents with supportive services that provide one or more of the following: work readiness health screenings, interview clothing, uniforms, test fees, transportation.					
Assisted residents with finding child care.					
Assisted residents to apply for, or attend community college or a four year educational institution.					
Assisted residents to apply for, or attend vocational/technical training.					
Assisted residents to obtain financial literacy training and/or coaching.					
Bonding assistance, guaranties, or other efforts to support viable bids from Section 3 business concerns.					
Provided or connected residents with training on computer use or online technologies.					
Promoting the use of a business registry designed to create opportunities for disadvantaged and small businesses.					
Outreach, engagement, or referrals with the state one-stop system, as designed in Section 121(e)(2) of the Workforce Innovation and Opportunity Act.					

Other.					
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**Table 9 – Qualitative Efforts - Number of Activities by Program**

**Narrative**

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