# CONSOLIDATED ANNUAL PERFORMANCE REPORT COMMUNITY DEVELOPMENT BLOCK GRANT FY 18



## COMMUNITY DEVELOPMENT OFFICE FAIR HOUSING COUNSELING P.O. BOX 475 DOVER DE 19903

#### **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 Dover received \$270,899 in Community Development Block Grant (CDBG) funds during fiscal year 2018. The following is a summary of the accomplishments during the program year:

Homeownership Assistance

Settlement Assistance was provided to 7 low income first-time homebuyers who purchased affordable housing in the City of Dover.

Home Repair Program

Twelve (12) owner-occupied housing units were repaired through the homeowner rehabilitation and emergency home repair programs. Two (2) units were completed through the homeowner rehabilitation program and 10 units were completed through the emergency home repair program.

**Public Services** 

210 homeless men benefited from operations cost to maintain a homeless shelter.

Two (2) homeless persons received motel vouchers for 30 days.

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
2018 Goal - AH-I Affordable Housing	Affordable Housing		Direct Financial Assistance to Homebuyers	Households Assisted	6	7	116.67%	6	7	116.67%
2018 Goal - AH-2 Affordable Housing	Affordable Housing		Homeowner Housing Rehabilitated	Household Housing Unit	8	12	150.00%	10	12	150.00%
2017 Goal - AH-3 Affordable Housing	Affordable Housing		Homeowner Housing Rehabilitated	Household Housing Unit	6	0	0.00%	1	0	0.00%
2018 Goal - HP-I Homeless/Rapid Re-housing	Homeless		Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted						
2018 Goal - HP-I Homeless/Rapid Re-housing	Homeless		Tenant-based rental assistance / Rapid Rehousing	Households Assisted	5	2	40.00%	5	2	40.00%
2018 Goal - HP-2 Homeless Prevention	Homeless		Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted						

2018 Goal - HP-2 Homeless Prevention	Homeless		Homeless Person Overnight Shelter	Persons Assisted	170	210	123.53%	170	210	123.53%
2018 Goal - PF-4 Public Facility Improvements	Affordable Housing		Homeless Person Overnight Shelter	Persons Assisted						
AH-I Affordable Housing	Affordable Housing	CDBG: \$105000	Direct Financial Assistance to Homebuyers	Households Assisted	6	7	167.67%	6	7	167.67%
AH-2 Affordable Housing	Affordable Housing	CDBG: \$64719	Homeowner Housing Rehabilitated	Household Housing Unit	8	12	150.00%	8	12	150.00%
AH-3 Affordable Housing	Affordable Housing	CDBG: \$20000	Homeowner Housing Rehabilitated	Household Housing Unit	6	0	0.00	6	0	0.00
HP-I Homeless/Rapid Re-housing	Homeless	CDBG: \$5000	Tenant-based rental assistance / Rapid Rehousing	Households Assisted	5	2		5	2	40.00%
HP-2 Homeless Prevention	Homeless	CDBG: \$22000	Homeless Person Overnight Shelter	Persons Assisted	170	210	123.53%	170	210	123.53%

Table 2 - 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 following is a summary of the outcomes during the FY18 program year:

Goal: Affordable Housing/Homeownership Assistance: The City provided 7 first time homebuyers with settlement assistance during the program year in order to purchase affordable housing in the City of Dover.

Goal: Affordable Housing /Homeowner Rehabilitation: During program year 2018, twelve (12) owner occupied homes were renovated and improved utilizing CDBG funds. Two (2) homes were fully rehabilitated through the Homeowner Rehabilitation Program and emergency home repairs were completed on 10 owner occupied homes.

Goal: Homelessness/Rapid-Rehousing/Homeless Prevention: Two (2) motel vouchers were issued for homeless persons.

Dover Interfaith Mission for Housing sheltered 210 homeless men during the program year that benefited from the operating cost to maintain the shelter.

## **CR-IO - 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	92
Black or African American	125
Asian	2
American Indian or American Native	1
Native Hawaiian or Other Pacific Islander	
Other	4
Total	224
Hispanic	1
Not Hispanic	23

Table 1-Table of assistance to racial and ethnic populations by source of funds

Narrative

## 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	CDBG	\$270,899	\$270,899

Table 2 - Resources Made Available

#### Narrative

## Identify the geographic distribution and location of investments

Target Area	Planned Percentage of Allocation	Actual Percentage of Allocation	Narrative Description
Dover City Limits	100%		City-wide
Downtown Target Area			

Table 3-Identify the geographic distribution and location of investments

#### Narrative

#### 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.

There is not a match requirement for CDBG funds; however, sub-recipient agencies that were funded have additional resources to supplement their projects. In addition, there are several initiatives and investment projects in the City where CDBG funds will be used as an additional resource to supplement funding these projects.

Twenty-two (22) affordable housing properties were constructed on vacant land and sold in the Restoring Central Dover (RCD) area that were developed by NCALL Research, Central Delaware Habitat for Humanity and Milford Housing Development Corporation. Recently, ten (10) properties located in the RCD area were purchased by NCALL Research that will be demolished with new affordable housing constructed on the lots to be sold to low income families.

### **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	3	0
Number of Non-Homeless households to be provided affordable housing units	6	7
Number of Special-Needs households to be provided affordable housing units	0	0
Total	9	7

Table 4— Number of Households

	One-year Goal	Actual
Number of households supported through Rental Assistance	3	0
Number of households supported through The Production of New Units		
Number of households supported through Rehab of Existing Units	10	12
Number of households supported through Acquisition of Existing Units	0	0
Total	13	12

Table 5 — Number of Households Supported

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

The City sets realistic goals based on the CDBG funding received in order to achieve positive outcomes. The difficulty in meeting the goals is due to limited funding and a greater need.

Discuss how these outcomes will impact future annual action plans.

The City will continue to set realistic goals in order to address affordable housing needs based on CDBG funding received annually in order to be consistent with the actual outcome with each activity.

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	5	
Low-income		
	10	
Moderate-income	4	
Total	19	

Table 6-Number of Households Served

#### **Narrative Information**

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 has provided CDBG funding to Connections Community Support Program to provide rapid rehousing/ rental assistance for up to three (3) homeless households within the City of Dover.

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

The City has provided CDBG funding to a local emergency shelter for operating cost that will assist in maintaining safe, decent and affordable housing. Code Purple was established in the fall of 2014 that provides shelter for homeless persons in Kent County when the temperature or wind chill drops below 32 degrees. When Code Purple is in effect, the homeless are guided to emergency shelters and participating churches within the City of Dover and throughout Kent County that provide warm beds.

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

During the FY15-FY19 Consolidated Plan period, the City of Dover will provide CDBG funding to the Connections Community Support Program that will provide rapid rehousing/rental assistance to support the homeless population and those that are at risk of becoming homeless transition to permanent supportive housing and independent living. In addition, the Delaware Continuum of Care (COC) provides supportive services as well as the State Division of Health and Social Services.

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 local and State housing providers will continue to provide support to the population identified. In addition, the Individualized Assessment, Discharge, and Planning Team (IADAPT)

was established in 2010 to provide inmates with advocates that will assist them with mainstream resources once they are discharged and reduce recidivism.

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

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

DHA conducts an annual and a 5-year Physical Needs Assessment of their public housing inventory to determine the public housing needs. Projects are prioritized by the greatest need and completed with funding from their Capital Fund Program and their Operating Subsidy funds.

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

Dover Housing Authority provides their residents with support and assistance in job training, parenting, counseling, financial management and other skills. These programs are integrated in the housing programs through the Family Self-Sufficiency Program and/or other Resident Initiatives. It is the position of the City of Dover that these programs provide excellent opportunities for those in public housing to become economically and socially self-sufficient. DHA also provides homeownership opportunities through their Section 8 program, where the resident applies 30% of their income towards their mortgage for the first fifteen years of owning their home and DHA pays the remaining 70%. After fifteen years, the resident pays 100% of their mortgage.

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

Not applicable

## 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 has updated its zoning ordinance to allow greater flexibility to develop different styles of affordable housing which includes relaxing the setback and block standards for the construction of condominiums and townhouse styles of housing in the Downtown Development District (DDD) Target Area. With the construction of affordable housing in this area, City sewer, water and impact fees will be waived.

Unlike many communities, Dover has not practiced "exclusionary zoning" where most of the undeveloped land is designated for large lot single family detached homes. To the contrary, The Dover Plan (Dover's Comprehensive Plan) designates a large portion of undeveloped lands for medium density housing, and a smaller but significant portion for high density housing. The land is subsequently zoned accordingly, permitting a range of residential densities and housing types. The most recent 2008 Comprehensive Plan Update was adopted in February 2009 with amendments in November 2009, March 2011, April 2011, March 2012, and March 2014. The Land Development Plan specifically identifies a range of residential land uses from low density to high density throughout the City. The plan continues to recommend a range of residential densities and focuses specifically on housing in one chapter.

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

The greatest obstacle in meeting the undeserved needs for the City are lack of federal, state and other sources of funding and the lack of affordable housing. In addition, the City's Downtown Target Area has the highest concentration of low to moderate income residents with aging homes in need of housing rehabilitation with only a 25% homeownership rate in this area.

The following is an outline of incentives to promote affordable housing in the City of Dover within the designated target areas:

#### **Incentives**

- Provide up to 20% cash rebate for qualifying construction projects (capped at \$1 million/property)
- A transfer tax rebate of the buyer's portion of the real estate tax upon issuance of a Certificate of Occupancy
- Waiver of building, plumbing, mechanical and fire protection permit fees
- Waiver of City sewer and water impact fees
- 10-year abatement of property tax on the value of improvements
- Up to \$20,000 in down payment cost to purchase affordable housing

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

Currently, the State of Delaware Department of Public Health enforces lead based paint abatement within the City of Dover. Under the State's program, families with children who have been diagnosed by the Public Health centers with lead poisoning are referred to a State Lead Based Paint Inspector. The inspector then performs the relevant technical analysis of the family's residence. If lead based paint is discovered, abatement is required. The City of Dover Department of Planning and Inspections acts in partnership with the State in assuring that lead paint hazards are reduced or eliminated, and that affected housing units are brought up to code.

The City currently requires lead-based paint testing and interim controls in conjunction with its CDBG rehabilitation program. The City of Dover Department of Planning and Inspections does not have the equipment necessary to accurately identify lead-based paint during housing inspections.

In addition to the activities of the City of Dover and the State of Delaware Department of Public Health, the Dover Housing Authority has been active in lead based paint abatement in the City. The Dover Housing Authority has tested and abated lead-based paint in all its public housing units. The Dover Housing Authority also deals with the lead paint hazards in private rental units through the enforcement of the Housing Quality Standards in conjunction with its Section 8 Rental Certificate/ Rental Voucher Program

The City of Dover provides information and training to staff who administer the Homeowner Rehabilitation Program to ensure the proper procedures are administered and that residents are properly educated on the dangers of lead based paint hazards.

For all rehabilitation projects that qualify for lead base paint testing and hazards, the City will take the necessary actions in order to reduce lead base paint hazards in accordance with HUD

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

The City will continue to fund CDBG projects that will reduce the number of poverty level families by addressing the most critical needs of families, such as providing rapid rehousing and rental assistance to the homeless, providing funding and support to emergency shelters, providing homeownership assistance to qualifying families who purchase affordable housing in the City of Dover, and complete homeowner rehabilitation and emergency homes repairs to owner occupied homes of low and very low income families in the City.

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

The main gap that exists in the Institutional Delivery System is the lack of affordable rental housing. The public housing waiting list for Dover Housing Authority has 934 applicants and 894 applicants on the Section 8 waiting list. The average person remains on the waiting list for up to 2 years which increases the risk of homelessness and suffers from a severe housing cost burden paying over 50% of their income in rent.

The strategy for overcoming gaps in the institutional structure is to continue to provide CDBG funding and support to the existing service and housing providers that service the needs of low income persons and those with special needs. In addition, the City will continue to work collaboratively with non-profits and the State and local housing authorities on initiatives that support affordable housing in the City of Dover.

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

The City will continue to collaborate with public and private housing providers and social service agencies to meet the goals and objectives of the Consolidated Plan. The Community Development Administrator is a representative on several boards and commissions throughout the State that service the needs of low to moderate income persons.

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

As a condition to receiving federal funds from the Department of Housing and Urban Development, entitlement jurisdictions such as the City of Dover are required to affirmatively further fair housing. As a result, the City collaborated with Delaware State Housing Authority, New Castle County and the City of Wilmington to complete an "Analysis of Impediments to Fair Housing Choice in Delaware" completed in August 2011. Included in the study is a Fair Housing Action Plan for the City of Dover which identifies impediments to fair housing choice and recommended strategies for the City to undertake to affirmatively further fair housing. The City will continue to actively pursue reducing the impediments identified for the City of Dover. For the FY19 submission of the Analysis of Impediments that will be submitted to HUD in the fall of 2019, the City has collaborated with Delaware State Housing Authority, Kent County, Dover Housing Authority, New Castle County and the City of Wilmington. Impediments that have been identified in the 2019 Fair Housing Plan will be reported in the 2019 CAPER with strategies to ameliorate the impediments identified for the City of Dover.

The following is a summary of the progress that the City has achieved during FY 2018.

Impediment #1: The City's increasingly diverse minority population may require language accommodations to ensure that all residents can access programs and services.

# Upon release of updated data from the 2010 U.S. Census, review and analyze data to determine if any of the languages spoken exceed 1000 persons with LEP

The data analysis from the U. S. Census Bureau, 2010-2014 American Community Survey estimated that out of 27,578 citizens in dover that are 18 years and over, 2% of that population speak English that is less than very well, which is less than 1000 person with LEP.

Provide other language services (i.e. translators, interpreters, etc.) on an as needed basis.

The City will provide language services on an as needed basis.

Impediment #2: Minority households have greater difficulty becoming homeowners in Dover because of lower incomes.

The following strategies have been implemented to meet this goal:

Strengthen partnerships with local lenders that will offer homebuyer education and other incentives to purchase a home in the City — The City has partnered with 13 lenders that participate in the City's Homeownership Assistance Program which provides down payment and settlement assistance to qualifying families. The City also continues its working relationship with NCALL who continues to provide housing counseling and foreclosure prevention to Dover residents.

## Identify effective ways to increase home ownership among minorities, residents of LMI census tracts, and LMI residents

The City is working on several initiatives in conjunction with other agencies that will assist in providing affordable housing and reducing the risk of homelessness for low income persons. The City is one of the stakeholders in the Restoring Central Dover Initiative which goal is to revitalize central Dover. Part of the initiative includes expanding the housing repair program to provide additional resources in the target area for home repairs and to boost homeownership opportunities in this area by providing down payment assistance and funding for renovations to families who purchase properties in the designated area. Habitat for Humanity is the lead agency for the Strong Neighborhood Housing Fund which will acquire vacant or foreclosed properties in the target area and use CDBG funding to renovate the property to sell to a family who is 60% and below the area median income in Dover. There are also several incentives available through the Downtown Dover Development District (DDD) designation. If a property is purchased within the Downtown Redevelopment Target Area, the transfer tax will be waived for owner occupied first time homebuyers and property taxes will be abated for owner occupied homes. Eligible persons shall also be given relief from payment of real estate taxes for the first four years owning their homes with prorated payments for each of the four years the home owner is occupying the property. The DDD and RCD areas will continue to provide affordable housing over the next 3 to 5 years.

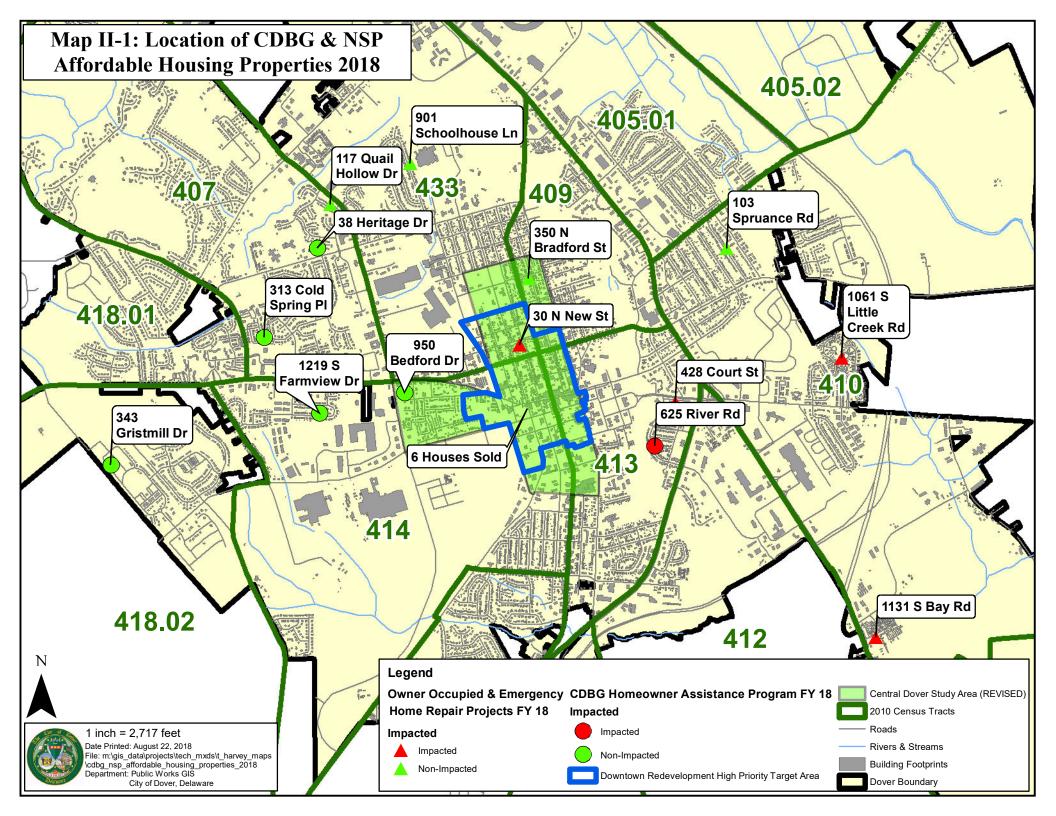
Map the location (Impacted Areas vs. Non-Impacted Areas) of all new CDBG and NSP assisted housing projects - Map II-I provides an overview of the City's CDBG affordable housing properties and investments during program year 2018. The housing provisions through the Homeownership Assistance and Homeowner Rehabilitation Programs are not primarily located in impacted areas but located throughout the City.

# Impediment #3: The City's supply of housing that is affordable to households up to 80% of median income is inadequate

The following strategies have been implemented to meet this goal:

Facilitate and promote land use policies and regulations that enable an increase in the supply of affordable rental housing in areas with adequate infrastructure.

The City will continue to collaborate with other housing providers and developers to leverage CDBG funding when possible to assist with the development of affordable rental housing in the City.



## Impediment #4: The City's supply of affordable housing and accessible housing is inadequate to meet demand

The following strategies have been implemented to meet this goal:

- Encourage landlords that are registered through the City's Rental Dwelling Housing Inspections Program to attend fair housing training The City collaborated with the Delaware Department of Justice and the Dover Police Department that sponsored a Crime Free MultiHousing Training Program for landlords in the fall of 2017 and in the spring of 2018 which included Fair Housing Training. The City will continue to offer this training annually which will include fair housing training. The following topics were presented by the Deputy Attorney General for the State of Delaware:
  - -The role of the Community Legal Aid Society
  - -The definition of Fair Housing
  - -What is prohibited under the Fair Housing Act
  - -Types of treatment that may be considered discriminatory
  - -What properties are covered by Fair Housing Law
  - -What is permissible under the Fair Housing Act
  - -Issues relating to persons with disabilities
  - -Remedies for people who encounter discrimination

# Impediment #5: The City's process for allocating and reporting CDBG funds could be improved from a fair housing perspective

The following strategies have been implemented to meet this goal:

- Give first consideration to the use of federal and state funds for new family rental and for-sale housing developments in non-impacted areas.
  - The City will continue to provide homeownership assistance city-wide over the next year.
- Amend the City's/s FY 2010-2014 Consolidated Plan and FY 2010 Annual Plan to include a definition of racially and ethnically concentrated areas that is consistent with the definition provided in the Al The City amended the definition of areas of racial and ethnic minority concentration in the 2010-2014 Consolidated Plan and FY 2010 Annual Action Plan in February 2012 so that it is consistent with HUD's definition of a geographical area where the percentage points are ten percentage points higher based on data estimates from 2010 Census data.

The City will continue to address the needs in the areas of racial and ethnic concentration by funding projects in these areas through homeownership and homeowner rehabilitation assistance.

Impediment #6: Policy documents utilized by the Dover Housing Authority could be improved from a fair housing perspective.

The HUD FEHO Office has made the distinction that this impediment does not follow under the obligation of the City to enforce since it is a separate entity.

Impediment #7: The 2008 Comprehensive Plan does not recognize the City's responsibility to affirmatively further fair housing.

Develop a statement summarizing the City's responsibility to affirmative further fair housing. Include this policy statement in the Comprehensive Plan.

The City is in the beginning planning stages for the 2019 Comprehensive Plan. The City will adopt the AFH plan once completed and incorporate a policy statement to affirmatively further fair housing.

Impediment #8: The City of Dover's zoning ordinance limits fair housing choice for certain families and persons living in group homes.

• Amend the City's zoning ordinance to remove undue restrictions on group homes. There are no restrictions in the City's Zoning Ordinance on group homes. The same regulations of single family homes apply to group homes as outlined in the State of Delaware's Code of Ordinance Title 22, Chapter 3, Sec. 309. Although the City, Zoning Ordinance has a provision that limits the number of unrelated persons that may live in a single household to five. This ordinance does not apply to State Licensed Group Homes.

Impediment #9: Members of the protected classes could be more fully represented on City Boards and commissions dealing with housing issues.

The Planning Commission and the Board of Adjustment are the only Board and Commission that represent housing-related issues. The City plans on improving its outreach methods by advertising through social media, press releases and the city's website when there are vacancies in order to assure that all members of protected classes will have an opportunity to compete for appointments.

# Impediment #10: Mortgage loan denials and high-cost lending disproptionately affect minority applicants

 Engage HUD-certified housing counselors to target credit repair education through existing advocacy organizations that work extensively with minorities

NCALL Research, a HUD certified housing counseling agency works directly with minorities with credit issues through their Financial Coaching Division which is a free service and also through housing counseling. NCALL does inform its clients of other advocacy organizations for credit repair, but often there is a fee associated with this service. The client has a choice in making a decision regarding their credit repair needs.

NCALL's Stand by ME Financial Coaching provides free personal one on one financial coaching to all Delawareans regardless of age or income. Most common services provided:

- Improve credit scores
- Reduce debt
- Increase savings
- College FAFSA assistance
- Improve employment opportunities
- Retirement
- Achieve homeownership

There are roughly 30 financial coaches at employment based and education based sites throughout Delaware. NCALL has 4 coaches based out of Dover Downs Hotel, Del Tech (Terry Campus), Dover AFB, Wilmington University, 7 DSHA Public Housing Sites, KISS Your Landlord Goodbye Program through DSHA, 10 English as a Second Language Sites.

#### 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 monitors CDBG activities on a consistent basis through client data, expense reports and subrecipient activities, and annually through Monitoring Site Visits to determine if the subrecipient is in compliance with HUD regulations and program agreements. The monitoring process includes identifying any areas of non-compliance in carrying out program activities and provides corrective actions to the sub-recipient to become compliant with the program guidelines. CDBG administrative staff will continue to provide technical assistance to subrecipeints and monitor financial compliance to ensure program funds are expended in a timely manner.

#### 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.

A minimum of two public hearings are required to allow the public an opportunity to comment on the Consolidated Plan, Annual Action Plan and the Consolidated Annual Performance Evaluation Report (CAPER). Adequate notice is given through advertisement in the City's local newspaper, and copies of the notices are sent to such service agencies and public housing administrative offices who serve and advocate for the low and very low income persons and disability communities to encourage citizen's participation input and meet the needs of the citizens who are beneficiaries of the program covered in the Consolidated Plan.

The Draft Plans are made available for review and comments for 30 days and 15 days for CAPERS at City offices and on the City's website. The City will consider any comments or views received in writing or orally and a summary of any views or comments not accepted and the reason therefore shall be attached to all final reports.

#### 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.

During program year 2018, there were no changes in the City of Dover's program objectives.

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

No.

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

Not applicable.