

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.

During the fourth year of the Five-Year Consolidated Plan for FY 2015-2019, the City of Sanford CDBG program was implemented by the Seminole County Community Services Department, through an Interlocal Agreement. Seminole County staff was responsible for administration and implementation of the CDBG program, in cooperation and partnership with City of Sanford staff. Staff held joint meetings, discussions and planning sessions with community members to disseminate information and updated the community on the status of the contractual arrangement with Seminole County and the scope this year of program activities. The interlocal agreement was concluded through a vote from the City Commission in May 2019. The City of Sanford resumed administration of their Community Development Block Grant Program October 1, 2019.

During the 2018-2019 program year, the City continued to focus its attention on improving of the predominately African-American neighborhoods of Sanford, primarily , Goldsboro and Georgetown. The neighborhoods are identified as primary target areas in the City's CDBG Five Year Consolidated Plan. The 2015-2019 Consolidated Plan was approved in July 2015 and identified high priority goals related to providing decent affordable housing opportunities through the homeowner occupied housing rehabilitation program, providing supportive services through public services grants that seek to create suitable living environment and maintain sustainability within the targeted areas. Sanford also seeks to create a suitable living environment by providing availability/accessibility to improved public facilities in the City.

For the CDBG program the highest priorities are:

- Affordable Ownership housing
- Supportive services
- Housing Rehabilitation
- Public Facilities Improvements (Street lights)
- Economic Development

The City of Sanford also seeks to improve the infrastructure in the target areas by installing much needed street lighting and making improvement to area parks and recreation centers. During the consolidated planning period the City also seeks to encourage economic development and provide assistance to small businesses in the area.

The accomplishments and progress of year one of the Five-Year Consolidated Plan activities are described below in Table 1 – City of Sanford CDBG Accomplishments– Program Year & Strategic Plan to Date. This table demonstrates the actual accomplishments in meeting Strategic Plan and Action Plan goals during program year 2018-2019.

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
Administration	Administration	CDBG: \$	Other	Other	1	1	100.00%			
Economic Development	Non-Housing Community Development	CDBG: \$	Businesses assisted	Businesses Assisted	4	0	0.00%	3	0	0.00%
Homeowner Occupied Housing Rehabilitation	Affordable Housing	CDBG: \$	Homeowner Housing Rehabilitated	Household Housing Unit	260	1	0.38%	2	7	350.00%

Public Facilities	Non-Housing Community Development	CDBG: \$	Public Facility or Infrastructure Activities for Low/Moderate Income Housing Benefit	Households Assisted	2000	0	0.00%			
Public Services	Non-Housing Community Development	CDBG: \$	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	2060	102	4.95%	127	102	80.31%

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 City of Sanford used its FY 2018-2019 CDBG funds primarily for housing rehabilitation and public services. Five (5) low and moderate income households received immediate needs repairs. Two (1) low households received reconstruction. Funds were also used to provide public services through subrecipient agreements with nonprofit partners. A total of 102 low and moderate income households benefited from public services. The City of Sanford established partnerships with one new agency during the FY 2018-2019 year to provide mental health services. The City of Sanford experienced challenges with their CDBG economic development program during the program year, as interested businesses could not get their landlords to take the steps needed for the businesses to fully participate in the program. The City may need to review the structure of the Economic Development program and make adjustments during the 2019-2020 program year.

Restraints in the amount of CDBG funding available resulted in allocation of funds to for activities that would address identified as the highest priority needs. There was not adequate funding available to fund public facility improvement projects for Program Year 2018. In addition, Housing rehabilitation and reconstructions require approximately \$50,000 to \$150,000 per unit. It reduces the number of households that can receive assistance during a given program year. Housing repair programs are a high priority in Sanford because of the aged housing stock in the City. Housing rehabilitation and reconstruction projects provide a visible and tangible impact at the individual, neighborhood and

community level.

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	2
Black or African American	117
Asian	0
American Indian or American Native	0
Native Hawaiian or Other Pacific Islander	0
Total	119
Hispanic	1
Not Hispanic	118

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

Narrative

The PR-23 Reveals that 119 persons were assisted with CDBG funds during FY 2018-2019. Of the total, three (3) were multi-racial. One was of Hispanic heritage.

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	448,253	311,647

Table 3 - Resources Made Available

Narrative

The City of Sanford will concentrate Community Development funding and improvements within City Commission District Two during the 2015-2019 Consolidated Planning Period. District Two includes the Goldsboro and Georgetown neighborhoods. Both neighborhoods have high concentrations of minorities and low and moderate income households. According to the PR-26 Report, \$311,647.40 has been expended in FY 2018-2019.

Sanford Commission District two includes the Goldsboro, Georgetown, Academy Manor, Pinehurst, Dreamwold, San Lanta and Country Club neighborhoods. The district is an area of focus because of the high concentration of low and moderate income households and high level of unmet needs that can be met with CDBG funded activities.

Identify the geographic distribution and location of investments

Target Area	Planned Percentage of Allocation	Actual Percentage of Allocation	Narrative Description
District Two	100	100	Housing Rehabilitation, Public Services
Georgetown			
Goldsboro			

Table 4 – Identify the geographic distribution and location of investments

Narrative

Commission District Two encompasses Georgetown and the Historic Goldsboro neighborhoods. Both areas have a high concentration of low and moderate income households and have historically been underserved. Goldsboro has the highest residents below the poverty level in the City of Sanford and Georgetown has the second highest number of residents below the poverty level. These two communities extend just beyond the City of Sanford's Community Redevelopment Area District as also. Both neighborhoods have significantly aged housing stock and considerable infrastructure needs.

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.

The City of Sanford only receives CDBG funding, which does not have a match requirement. The City encourages agencies receiving public services funding to leverage CDBG funding with in-kind or financial resources. In addition, the City of Sanford seeks to leverage in-kind services through partnerships with faith based and other agencies.

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	2	6
Number of Special-Needs households to be provided affordable housing units	0	1
Total	2	7

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	1
Number of households supported through Rehab of Existing Units	4	6
Number of households supported through Acquisition of Existing Units	0	0
Total	4	7

Table 6 – Number of Households Supported

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

During FY 2018-2019, the City of Sanford CDBG program exceeded the planned goal for the number of households served with rehabilitation of existing units through the Immediate Needs and rehabilitation/reconstruction program. Income constrained households that needed costly repairs to their owner-occupied homes were given grants up to \$15,000 to complete up to 2 separate trades (roof, HVAC, plumbing, etc) to maintain the condition and affordability of their units. During the program year, seven (7) households were served at a total cost of \$192,538.48. During the 2017 program

year, staff found that the housing stock within Sanford is significantly aged requiring more extensive repairs than can be achieved through the Immediate Needs program. The substantial housing repair and reconstruction projects are more costly and will result in a reduction in the total number of houses completed. The City approved shifting the emphasis of its housing repair program to substantial housing rehabilitation and reconstruction in 2016 and continues to primarily rehabilitate and reconstruct housing units.

Discuss how these outcomes will impact future annual action plans.

The outcomes realized for the affordable housing programs in the City of Sanford is expected to result in fewer houses receiving assistance in future action plans because housing rehabilitations can range in cost from \$50,000 to \$150,000. However the substantial rehabilitation or reconstruction of units could provide more of a visual impact to the target areas.

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	12	0
Low-income	90	0
Moderate-income	0	0
Total	102	0

Table 7 – 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 of Sanford currently has limited funding devoted to homeless services, but the housing rehabilitation programs provide repairs that in some cases, can prevent homelessness, by improving substandard housing conditions. County ESG funding can be used Countywide. A homeless shelter is located in Historic Goldsboro area. The City makes regular service referrals to the Rescue Outreach Mission to assist homeless individuals and families. The City of Sanford participates in the Continuum of Care. The Homeless Services Network of Central Florida serves as the lead agency for the Continuum of Care (CoC) agency. HSN implements Street Outreach activities and report the latest Point-in-Time (PIT) survey. To assist the local non-profit homeless service providers in developing and implementing strategies.

During the 2017-2018 program year the City of Sanford partnered with Seminole County and the Heart of Central Florida United Way to contract with Florida Housing Coalition to provide training and technical assistance to the Rescue Outreach Mission.

The City of Sanford has established a Homeless Task Force to assess the homeless activity in the City, identify gaps in services and develop strategies to move the chronic homeless out of camps and the downtown area. During the past year the City worked collaboratively with the homeless services providers to successfully relocate 6 homeless individuals from homeless camps.

The City continues to work collaboratively with Seminole Action Coalition Serving Our Needy (SACSON) to print information cards to identify services available for the needy and homeless. The services include housing/counseling, healthcare, food/clothing/hygiene, and meal sharing locations. The brochure is printed in both English and Spanish.

The City is in the process of transferring the deed of two duplexes renovated through the NSP-3 program to a non-profit organization to assist with housing homeless families.

Addressing the emergency shelter and transitional housing needs of homeless persons

Due to lack of funding sources, the City of Sanford does not administer any internal programs or services that provide a direct benefit to homeless persons. Seminole County, in partnership with three local non-profit homeless services providers, anticipates providing ESG funding to increase efforts of addressing the needs of homeless persons who are in need or are currently residing in emergency shelters or transitional housing facilities. During the FY 2018-2019 program year the Seminole County provided ESG

funding to the Rescue Outreach Mission, Safehouse of Central Florida, and Recovery House for eligible operation and maintenance expenses to assist approximately individuals that are homeless, including victims of domestic violence and those in need of substance abuse treatment. Homeless persons within the City of Sanford are eligible for assistance through these organizations, and while specific numbers of City of Sanford residents that received shelter as a result of this ESG funding is not documented, it is expected that a portion of their beneficiaries were City (or formerly City) residents due to the close proximity to the shelter facilities.

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 Sanford currently has limited funding devoted to homeless services, but their housing rehabilitation programs provide repairs that in some cases, can prevent homelessness, by improving substandard housing conditions. City residents are also eligible to apply for rental assistance, utility assistance, and family self-sufficiency programs operated by Seminole County Community Services. While these programs are not designated as homelessness prevention, they assist households from losing housing by the nature of the activities they fund.

The City continues to work with the Sanford Homeless Task Force to find an adequate facility to accommodate a “Day Center” for the chronic homeless. The Sanford Police Department has a partnership with Recovery House of Central Florida for ten beds in the new facility for the recovering addicts target population.

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

Chronically homeless individuals and families, unaccompanied youth and veterans in Sanford benefit from the homeless services that are funded by Seminole County Community Services programs. All of Seminole County's affordable housing strategies and funding sources are available to assisting in the efforts of helping homeless persons make the transition to permanent housing and independent living, but there are no current affordable housing strategies specifically directed toward homeless persons during this current five year planning period. The City and the County relies on its non-profit homeless services provider partners and the local Continuum of Care agency to implement affordable housing

activities that directly affect the homeless populations that they serve. Eligible affordable housing providers are encouraged to apply for annual funding allocations to promote and implement affordable housing activities, for all segments of the population, during the County's advertised Request for Applications (RFA) procurement process each fiscal year. Applications received will be evaluated based on project scoring criteria, developed by the County, and determined to be awarded or denied based on HUD regulated program criteria.

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

Actions taken to address the needs of public housing

The Sanford Housing Authority does not operate any public housing units or housing choice vouchers programs for public housing residents. In 2011, the Orlando Housing Authority entered into an agreement with the Sanford Housing Authority Board of Directors to manage day to day operations of the six public housing developments and 450 housing choice vouchers in Sanford. Also in 2011, HUD condemned all 480 public housing units due to dilapidated housing conditions. The 450 housing choice vouchers that were designated for public housing residents in Sanford, are now administered by the Orlando Housing Authority and are no longer designated specifically for Sanford public housing residents.

In 2016, the Sanford Housing Authority and the City of Sanford received a two year Choice Neighborhoods Initiative planning grant to transform the neighborhood and help improve housing in the Goldsboro Neighborhood. The Transformation Plan includes the replacement of 209 public housing units and affordable single family for-sale units. The City of Sanford is an active partner in the planning initiative and provided the matching funds \$250,000. for the grant along with \$350,000 plus of inkind staff support. To date, a series of community meetings and work group meetings have occurred. The City of Sanford supported the Choice Neighborhood Initiative in a variety of ways, such as: commitment of staff and funding, use of community and other facilities to host community meetings, steering committee, and choice neighborhoods workgroup meetings. Choice Neighborhoods Initiative meetings were held monthly. The Transformation Plan was submitted to HUD on June 28, 2018 as scheduled. The City continue in partnership with SHA and the Goldsboro Front Porch Council in preparing to submit an application for a HUD Choice Neighborhood Implementation Grant.

The City has partnered with the Sanford Housing Authority in the redevelopment of Redding Gardens. A developer has been selected and the designs for a 90 unit senior housing complex approved by Planning and Zoning. The developer has secured the necessary funding and the ground breaking occurred the first quarter of 2019.

The City is working with private developers to build affordable rental units to include several duplexes and a 16-unit senior housing complex in the CDBG Target area.

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

The City of Sanford collaborated with the Housing Authority to encourage input and participation from public housing residents, as it relates to the new Choice Neighborhoods Planning Grant. The residents are important stakeholders in the process and are provided with information and community resources to encourage homeownership. In collaboration with Habitat for Humanity three (3) homes were built for low-income first time homeowners.

Actions taken to provide assistance to troubled PHAs

Under contract with the Sanford Housing Authority, the Orlando Housing Authority manages housing authority properties in Sanford. The Orlando Housing Authority is not a troubled Agency. The Orlando Housing Authority is designated as a Standard Performer as documented through HUD's Public and Indian Housing Information Center at <https://pic.hud.gov/pic/haprofiles/haprofilelist.asp>. The Sanford Housing Authority is no longer considered a troubled agency. The City of Sanford supports the collaboration between the Sanford Housing Authority and the Orlando Housing Authority in any initiative they have to improve public housing in Sanford. Sanford Housing authority and the City of Sanford received a choice neighborhood planning grant in 2016 to develop a transformation Plan to improve the quality of life for residents in the Goldsboro neighborhood. The Plan include improving housing in the neighborhood. The City of Sanford was the co-applicant on the Choice Neighborhood Initiative Planning Grant and an active participant in the planning initiative. Currently the City of Sanford, Sanford Housing Authority and Goldsboro Front Porch Council are evaluating the feasibility of applying for a Choice Neighborhood Implementation Grant to assist with implementing the Transformation Plan.

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 of Sanford strives to address and overcome obstacles to meeting underserved needs of the community by working with public and private sector organizations that provide a direct service or benefit to underserved residents. All of the City's planned goals and objectives identified in the 2017-2018 Annual Action Plan and the 2015-2019 Consolidated Plan are linked directly with the priority needs identified in all of the low-mod income target areas county-wide. In the event that a particular target area is identified as an underserved community or a particular segment of the population is identified as underserved, the City will take all necessary actions to address those needs with federal program funding, when available.

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

Some examples of obstacles that may prevent the City in meeting underserved needs are:

- An aging housing stock that requires substantial rehabilitation that exceed the current federal funding allocation budget
- Lack of industrial infrastructure to attract big corporate businesses for more economic development impact in target area

The City of Sanford continues to implement a Lien Amnesty Program that seeks to help return properties to productive use by allowing certain code enforcement liens to be reduced after property is brought into compliance with the City Codes. During the FY 2018-2019 program year, the program helped generate \$123,555 in outstanding liens and bring 30 properties into code compliance. Without this special program, liens would continue to accumulate and ultimately prevent development.

The City continues to examine methods and unit designs to make effective use of approximately 100 vacant, undersized infill lots within the Choice Neighborhood areas in the Goldsboro community. In addition to these ideas and standards, Sanford is seeking to have a mix of single family and multifamily housing units. The Transformation Plans and schematics have been presented at Community Meetings and Stakeholder meetings during the 2018-2019 program year.

During the 2017 program year, the City of Sanford re-evaluated its housing rehabilitation program needs after finding that there were a large number of case denials for the Immediate Needs Program. Cases were denied for several reasons, primarily because the repair needs far exceeded the \$15,000 per unit cap for the Immediate Needs Program. The City, with feedback from the community

changed the focus of their housing program to focus on larger rehabilitation or reconstruction activities that would provide a larger visual impact on the target areas. The City has continued providing housing rehabilitation and reconstruction assistance in 2018-2019, with the completion of two units. Five (5) household received immediate needs in 2018-2019.

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

All affordable housing projects, funded by the City of Sanford and administered by the Seminole County Community Services Department, will be conducted in accordance with Seminole County LBP identification and abatement standards. Seminole County requires that all contractors complete a detailed work write-up to document any lead based paint hazard risk prior to construction on any affordable housing activities.

In accordance with the HUD Lead-Based Paint Regulation (24 CFR Part 35), rehabilitation work on housing built before 1978 that is financially assisted by the Federal government is subject to requirements that will control lead-based paint hazards. At the very least, Seminole County will test and repair any painted surface that is disturbed during the work. The County may stabilize deteriorated paint, which includes the correction of moisture leaks or other obvious causes of paint deterioration. Clearance examination will be conducted following most work activities to ensure that the work has been completed; that dust, paint chips and other debris have been satisfactorily cleaned up; and that dust lead hazards are not left behind. As necessary, a risk assessment will be done to identify lead-based paint hazards, perform interim control measures to eliminate any hazards that are identified or, in lieu of a risk assessment, perform standard treatments throughout a unit. The type and amount of Federal assistance and rehabilitation hard costs for the unit will determine the level of lead hazard reduction that will be completed.

Pursuant to Seminole County's Community Development Policy and Procedures, homeowner rehabilitation projects for pre-1978 homes are implemented in accordance with Lead Hazard Reduction requirements. Affected households are provided lead paint hazard brochures and disclosures. Contractors hired to do testing are required to be lead based paint certified.

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

The University of Central Florida Department of Public Administration, in partnership with the Seminole County Health Department, completed a detailed analysis of the characteristics of distressed neighborhoods in the City of Sanford. The City is currently in the process of discussing actions to take to alleviate the poverty in the identified neighborhoods. Some examples of actions that will be taken to reduce the number of poverty-level families include:

- Providing job training to youth and unemployed
- Working with the Sanford Housing Authority for planning future public housing development for very-low and low-income families who suffered from the loss of existing public housing in 2011

- Working with the local Chamber of Commerce to discuss potential opportunities for economic growth throughout these neighborhoods
- Working with Habitat for Humanity to design a “Fix-up” program
- Encouraging adult continuing education programs in the target area

The analysis was recently completed. The results of the study have been presented to the City of Sanford Commission and approved. Staff is working on developing an action plan to address the recommendations.

The City of Sanford has placed a priority on youth services, particularly those that provide mentoring and employment skills training for its public services.

The City of Sanford also reexamined its consolidated plan goals to create a CDBG funded economic development grant program aimed at encouraging the development of small businesses. Referral services to programs that promote employment, and skills training for individuals and households in poverty.

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

Seminole County Community Services Department served as Administrator of the CDBG program funds and activities for the 2018-2019 program year. The City of Sanford resumed administration of their program October 1, 2019. According to the City of Sanford 2015-2019 Consolidated Plan. The City, elected officials, citizens, non-profit agencies, and for-profit organizations, will continue networking and trying to assess what residents need and how best to meet those needs. Keeping the private and public sector aware of all services provided will be a key objective for the City. The City of Sanford is electing to further develop the institutional structure of accomplishing the CDBG program goals and objectives outlined in the Consolidated Plan.

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

The following list describes actions that the City is either currently implementing or plans to implement to enhance coordination between public and private housing and social services agencies:

- The City of Sanford is currently in partnership with the local Habitat for Humanity to expand access to affordable housing opportunities for low-moderate income families in Sanford.
- The City of Sanford is exploring several options that include method and time of permit fee payment for enhancing affordable housing in Sanford.
- Rezoning the Gldsboro neighborhood to support the Transformation Plan
- The City of Sanford is in discussions with private developers for the construction of affordable single family units.
- The City of Sanford partners with Seminole County Social Services. The Seminole County

Community Development Division Manager serves as the fair housing officer for Seminole County.

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

The City of Sanford's 2015 Analysis of Impediments to Fair Housing (AI) results identifying the impediments and progress on recommended actions are as follows:

Discrimination in Housing Sales and Rental

Progress on Actions: Through its agreement with Seminole County, the County Community Development Division Manager serves as the Fair Housing Coordinator. Seminole County also provides Housing Counseling County wide. The Housing Counseling curriculums have been updated to include fair housing in the first time homebuyer classes.

Lack of Existing/Available Affordable Housing Stock and the Geographic Distribution of Affordable Housing Stock.

Progress on Actions: The City website has not yet been updated with the fair housing link, but will be posted during the next program year. In addition to Coordination with County Fair Housing Coordinator, the City has Community Relations and Neighborhood Engagement staff that fields inquiries and concerns about matters in the City, including community development and housing issues.

Unintentional Effects of Local Land Use Regulations/Public Policies and/or the Results of Implementing Antiquated Land Use Regulations

Progress on Actions: The Comprehensive Plan is under review. The Comprehensive will be reviewed throughout the remainder of the Consolidated Planning period. Feedback will be given to the Planning and Development Services Department or Planning and Zoning Commission as needed.

Local development standards and their implementation e.g. zoning, building or design standards, may constrain development of housing opportunities for minority and low income households

Progress on Actions: The Comprehensive Plan will be reviewed throughout the remainder of the Consolidated Planning period. Feedback will be given to the Planning and Development Services Department or Planning and Zoning Commission as needed.

Inadequate access for minority households to housing outside of areas of minority concentration

Progress on Actions: The City of Sanford is partnering with agencies such as Habitat for Humanity for the construction of affordable housing units. The City of Sanford is currently working with the Sanford and Orlando Housing Authority through the Choice Neighborhoods Initiative. The Initiative seeks to revitalize

the community and provide additional housing. The planning and revitalization efforts will continue throughout the consolidated planning period. As part of the Choice Neighborhood Initiative Planning Grant a Market Analysis Residential Products in Goldsboro was conducted by Community Solutions Group. The analysis took a comprehensive look at the housing need, style, size and price range (for-sale units).

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

Under the provisions of the Interlocal Agreement, Seminole County Community Services was tasked with the responsibility of monitoring the City's CDBG program for the 2018-2019 Program Year. The County has a dedicated project manager who is actively involved in working with the Compliance Office of Community Services to provide project records and documentation to conduct the monitoring. This process involves a combination of monthly activity reports, telephone contacts, written communication, analysis of reports and audits, and onsite visits and meetings. The primary goal of all monitoring is to ensure activities are implemented in conformity with program rules and guidelines.

The monitoring of CDBG activities is conducted in accordance with the Comprehensive Monitoring Plan and Monitoring Subrecipients Policy and Procedure, a copy is appended to this CAPER report as an attachment. Oversight of the applicable requirements for the CDBG Program, are implemented in various methods accordingly:

- Uniform Administrative Requirements new circular 2 CFR Part 200- oversight is conducted by various program staff including Project Manager and Community Development team, Business Manager and staff, Compliance Office.
- Timeliness of Expenditure- monitored by Community Development and Compliance Office.
- Environmental Reviews -completed by Community Development Staff prior to any funds being expended on all CDBG funded projects.
- Uniform Relocation Assistance (URA)- The City of Sanford does not currently utilize CDBG for projects which would trigger involuntary displacement of a household, however, in the event of such a project the Community Development and Compliance Office staff would provide oversight to ensure the acquisition is implemented in accordance with HUD Handbook 1378.
- MBE/WBE and Section 3 hiring requirements are addressed in the procurement and contracting process. The encouragement of participation of MBE/WBE and Section 3 business concerns is done through the bidding process. The City of Sanford and Seminole County Staff coordinate and provide regular updates on the status of CDBG projects and other City initiatives, and discuss the need for opportunities for minority businesses and efforts to foster increased outreach and participation in CDBG projects. The updates are generally provided monthly.
- Fair Housing Requirements- Community Development and Compliance staff received training on fair housing requirements during the annual Fair Housing Summit hosted in Orlando, FL; and all applicable policies and procedures incorporate Fair Housing and anti-discrimination policy.
- Planning and Reporting- All planning and reporting is conducted in cooperation with the City of Sanford and submitted by Seminole County Community Development and Compliance Office staff. Staff from Seminole County coordinate with the City to conduct regular reviews of

the IDIS financial system for flags and takes steps to resolve any issues needed to clear any flags. The reviews are generally completed bi-monthly, before and after the drawdown of any funds.

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.

Sanford's Citizen Participation Process provides the opportunity for citizen's participation and input in the process of the City's planning, development, amendments and implementation of the Five Year Consolidated Plan, Annual Action Plans, Substantial Amendments, Consolidated Annual Performance Evaluation Reports (CAPER) and the Citizen Participation Plan. This process seeks to encourage maximum public participation from a broad cross section of the community to include minorities, non-English speaking persons and persons with disabilities, low and moderate income persons, particularly those living in slum and blighted areas and residents of predominantly low and moderate income neighborhoods areas where CDBG funds are proposed to be used, local and regional institutions and other organizations (including businesses, developers, and community/faith-based organizations), residents of public and assisted housing and by other low-income residents of targeted revitalization areas in which public and assisted housing is located. Accommodations are also made for persons with disabilities.

The City of Sanford sought feedback from the community in a variety of ways. The City participates in monthly community meetings where City departments meet at a neighborhood community center face to face with residents to field questions and hear concerns. The Community Meetings are held at the Sanford Westside Community Center, centrally located near the Historic Goldsboro neighborhoods. Bi-monthly community meetings are held on the eastside for the Georgetown neighborhood. The City also has regular meetings of their CDBG Advisory Board. The Advisory Board meets monthly to discuss CDBG programming, review and rank public services proposals and offer funding recommendations and feedback to City and County staff.

During FY 2018-2019 period, comments were received from the public at various community meetings. The meetings with the public, CDBG Advisory Board and City staff, helped spotlight the need for refining different strategies for community development in Sanford. Feedback about the need for more extensive housing repairs because of the aged housing stock in Sanford was valuable. Comments

about supporting the Choice Neighborhoods Planning Initiative was also beneficial to the Annual Action Planning process for FY 2019-2020.

In accordance with the currently adopted Citizen Participation Plan for the City of Sanford, the availability of the CAPER and notice of the public meeting to be held were advertised in the local newspaper on December 4, 2019. The 15-day public comment period began on December 4, 2019, and ended on December 20, 2019. Hard Copies of the CAPER were also available at Sanford City Hall and Seminole County Community Services for persons without computer access. A public meeting was held on December 11 2019, and all written public comments received during the comment period and received verbally at the public meeting, are appended to the CAPER report. A copy of the advertisement and public notices are included to document the public participation process.

No comments were received at the public meeting held on December 11, 2019. No comments were received by the end of the public comment period of December 20, 2019.

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 the 2017 program year, staff found that the housing stock within Sanford is significantly aged requiring more extensive repairs than can be achieved through the Immediate Needs programs. The substantial housing repair and reconstruction projects are more costly and will result in a reduction in the total number of houses completed. The City approved shifting the emphasis of its housing repair program to substantial housing rehabilitation and reconstruction. The outcomes realized for the affordable housing programs in the City of Sanford is expected to result in fewer houses receiving assistance in future action plans because housing rehabilitations can range in cost from \$50,000 to \$150,000. However, the substantial rehabilitation or reconstruction could provide more of a visual impact to the target areas.

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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