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CR-00 Executive Summary

In accordance with the Federal regulations found in 24 CFR Part 570, the City of Frederick, Maryland has prepared this Consolidated Annual Performance and Evaluation Report (CAPER) for the period of July 1, 2020 to June 30, 2021. The CAPER describes the activities undertaken during this time period for funding from the U.S. Department of Housing and Urban Development (HUD) under the Community Development Block Grant Program (CDBG). The projects/activities and accomplishments described in this CAPER principally benefit low- and moderate-income persons and the funding has been targeted to areas where there is the highest percentage of low- and moderate-income residents in the City of Frederick. The following is the overall program narrative based on the FY 2020-2024 Five Year Consolidated Plan and Annual Action Plans, as amended.

A listing of the active projects is found in CR-50 – IDIS Reports of the document. The CAPER meets three (3) basic purposes:

1. It provides HUD with the necessary information for the Department to meet its statutory requirement to assess each grantee's ability to carry out relevant CPD programs in compliance with all applicable rules and regulations.
2. It provides information necessary for HUD's Annual Report to Congress, also statutorily mandated.
3. It provides grantees with an opportunity to describe to citizens their successes in revitalizing deteriorated neighborhoods and meeting objectives stipulated in the Five Year Consolidated Plan and Annual Action Plans.

The FY 2020-2024 Five Year Consolidated Plan's priorities are to address issues of housing; homeless; special needs; community development; economic development; and administration, planning, and management. The City continued to partner with existing social service providers to provide support services to special needs populations with the most urgent needs (identified through the citizen participation process), through efforts of the City government, and through partnerships with for-profit and non-profit housing developers.

The City of Frederick completed the first year of its FY 2020-2024 Five Year Consolidated Plan for the Community Development Block Grant (CDBG) Program.

The City of Frederick's FY 2020 Consolidated Annual Performance and Evaluation Report (CAPER) was made available for public display and comment at the City's website (<https://www.cityoffrederickmd.gov/>). The "Draft" CAPER was advertised in the local paper on Tuesday, September 7, 2021.

Funds Received –

The City of Frederick has received the following funds during the time period of July 1, 2020 through June 30, 2021:

	CDBG	CDBG-CV	Total
Entitlement Grants	\$ 413,734.00	\$ 640,961.00	\$ 1,054,695.00
Program Income	\$ 18,000.00	\$ 0.00	\$ 18,000.00
Total Funds Received:	\$ 431,734.00	\$ 640,961.00	\$ 1,072,695.00

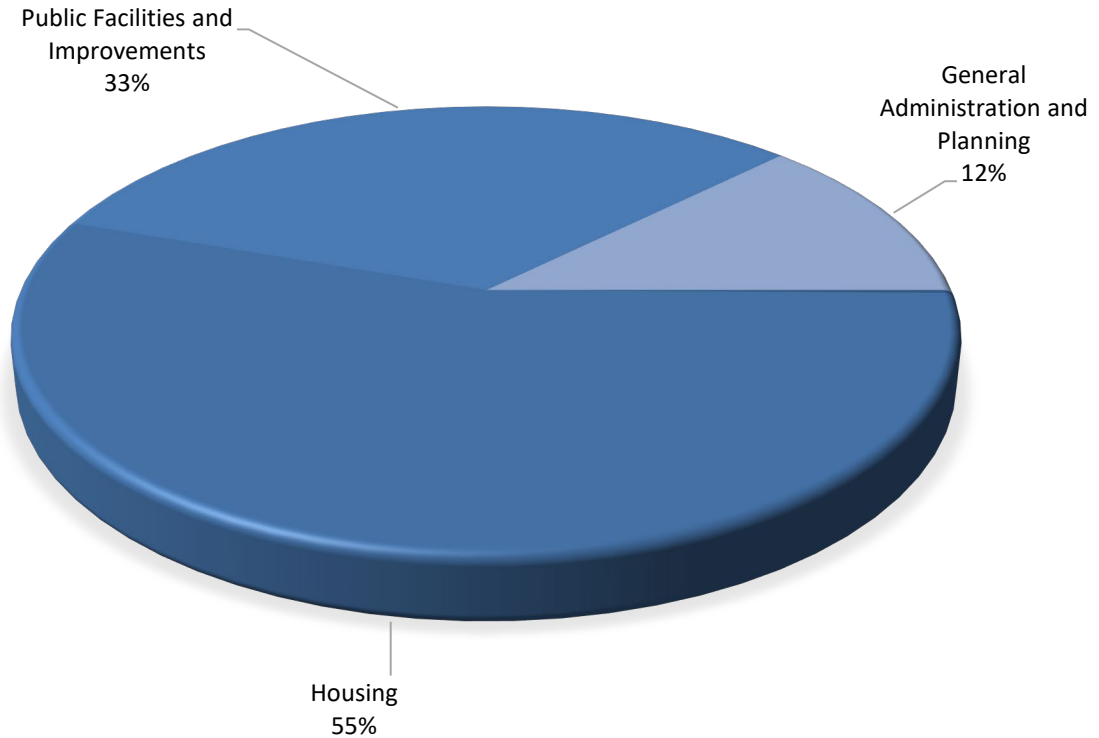
This chart only includes funds received during July 1, 2020 through June 30, 2021. Any previous program year funds that were not spent or which might have been spent during this time period are not included.

Funds Expended –

The funds shown in this chart are funds that were expended during the time period of July 1, 2020 through June 30, 2021. These expenditures consist of previous program year funds that were not drawn down until this time period and also includes any reprogrammed funds from previous years.

Funding Sources	Total Funds Expended
Community Development Block Grant (CDBG) Funds	\$ 51,536.60
Community Development Block Grant - Coronavirus (CDBG-CV) Funds	\$ 39,600.00
Total:	\$ 91,136.60

The City’s CDBG expenditures by type of activity are shown below.



Type of Activity	Expenditure	Percentage
Acquisition	\$ 103.88	0.20%
Housing	\$ 28,394.00	55.09%
Public Facilities and Improvements	\$ 16,680.65	32.37%
General Administration and Planning	\$ 6,358.07	12.34%
Total:	\$ 51,536.60	100.0%

Regulatory Caps –

CDBG Program Administration Expense Cap:

The City of Frederick CDBG program administration expenditures were within the regulatory cap. This is shown in the chart below:

	CDBG
FY 2020 Entitlement Grant	\$ 413,734.00

FY 2020 Program Income	\$ 18,000.00
Administrative Cap Allowance	20.0%
Maximum Allowable Expenditures	\$ 86,346.80
Total Administration Obligated	\$ 87,759.00
Administrative Percentage:	20.03%

The City of Frederick’s total administrative obligation was \$87,759.00, which at the 20.0% cap on administrative expenditures.

CDBG Public Service Activity Cap:

	CDBG
FY 2020 Entitlement Grant	\$ 413,734.00
Prior Year Program Income	\$ 45,585.50
Public Service Cap Allowable	15.0%
Maximum Allowable Expenditures	\$ 68,897.93
Total Public Services Obligation	\$ 62,000.00
Public Service Percentage:	13.5%

The City of Frederick total public services obligation was \$62,000.00, which was 13.50% of the allowable expenditures and below the 15.0% cap on public services.

Five Year Goals and Strategies:

The chart below shows the goals and objectives for the FY 2020-2024 Five Year Consolidated Plan for the City of Frederick:

Housing Strategy –

Priority Need: There is a need to increase the amount of affordable, decent, safe, and sanitary housing for homeowners, homebuyers, and renters.

Objective: Improve, preserve, and expand the supply of affordable housing for low- and moderate-income persons and Households.

Goals:

- **HS-1 Housing** – Increase the supply of decent, safe and sanitary accessible housing that is affordable to owners and renters in the City by assisting with acquisition and development fees.
- **HS-2 Housing Rehabilitation** – Conserve and rehabilitate existing affordable housing units occupied by owners and renters in the community by addressing code violations, emergency repairs, energy efficiency improvements, and accessibility for persons with disabilities.
- **HS-3 Homeownership** – Assist low- and moderate-income homebuyers to purchase homes through down payment / closing cost assistance, and associated housing counseling.
- **HS-4 Acquisition for Homeownership** – Increase the supply of decent, safe and sanitary accessible housing that is affordable to owners and renters in the City by acquisition of existing residential properties for resale to income eligible Home buyers.
- **HS-5 Fair Housing** – Promote fair housing choice through education training / outreach and affirmatively furthering fair housing.

Homeless Strategy –

Priority Need: There is a need for services and housing opportunities for homeless persons and persons or households at-risk of becoming homeless.

Objective: Improve the living conditions and support services available for homeless persons, households, and those who are at risk of becoming homeless.

Goals:

- **HMS-1 Housing** – Support the Continuum of Care's efforts to provide emergency shelter, transitional housing, permanent supportive housing, and other permanent housing opportunities.
- **HMS-2 Operation/Support** – Support providers operating housing or providing support services for the homeless and persons or households at-risk of becoming homeless.
- **HMS-3 Prevention and Re-Housing** – Support the Continuum of Care's efforts in prevention of homelessness through anti-eviction activities and programs for rapid re-housing.

Other Special Needs Strategy –

Priority Need: There is a need to increase housing opportunities, services, and facilities for persons with special needs.

Objective: Improve the living conditions and services for those residents with special needs, including the disabled population.

Goals:

- **SNS-1 Housing** – Increase the supply of affordable, accessible, decent, safe, and sanitary housing for the elderly, persons with disabilities, persons with HIV/AIDS, victims of domestic violence, persons with alcohol/drug dependency, and persons with other special needs through rehabilitation of existing buildings and new construction.

- **SNS-2 Social Services** – Support social service programs and facilities for the elderly, persons with disabilities, persons with HIV/AIDS, victims of domestic violence, persons with alcohol/drug dependency, and persons with other special needs.

Community Development Strategy –

Priority Need: There is a need to improve community facilities, infrastructure, public services and quality of life.

Objective: Improve the community facilities, infrastructure, public services, public safety, and transportation, along with the elimination of blighting influences in the City of Frederick.

Goals:

- **CDS-1 Community and Public Facilities/Infrastructure** – Improvements to public buildings and community facilities in the City including public infrastructure through rehabilitation, reconstruction, and new construction of streets; sidewalks; bridges, curbs; walkways; water; storm water management; sanitary sewers; lighting; parks; recreational facilities, neighborhood facilities, and trails including handicap accessibility improvements and removal of architectural barriers;
- **CDS-2 Public Services** – Improve and enhance public services, programs for youth, the elderly, and persons with disabilities, and general social/welfare public service programs for low- and moderate-income persons and households.
- **CDS-3 Public Safety** – Improve public safety facilities, equipment, crime prevention, community policing, and ability to respond to emergency situations.
- **CDS-4 Rehabilitation/Demolition** – Remove and eliminate slum and blighting conditions through rehabilitation and/or demolition of vacant, abandoned, and dilapidated structures.
- **CDS-5 Accessibility Improvements** – Improve handicap accessibility improvements and removal of architectural barriers to public and community facilities.

Economic Development Strategy –

Priority Need: There is a need to increase employment, self-sufficiency, educational training, and empowerment for residents of the City.

Objective: Improve and expand employment opportunities in the City for low- and moderate-income persons and households.

Goals:

- **EDS-1 Employment** – Support and encourage job creation, job retention, and job training opportunities.
- **EDS-2 Development** – Support business and commercial growth through expansion and new development.
- **EDS-3 Redevelopment** – Plan and promote the development, redevelopment, and revitalization of vacant and underutilized commercial and industrial sites.
- **EDS-4 Financial Assistance** – Support and encourage new economic development through local, state, and Federal tax incentives and programs such as Tax Incremental Financing (TIF), tax abatements (LERTA), Enterprise Zones/Entitlement Communities, Section 108 Loan Guarantees,

Economic Development Initiative (EDI) funds, Opportunity Zones, Low-Income Housing Tax Credit (LITEC) Program and other programs that may be identified.

- **ED-5 Access to Transportation** – Provide operational support for the expansion of public transportation and access to bus and automobile service and facilities serving alternate modes of transportation to assist residents to get to work or training opportunities.

Administration, Planning, and Management Strategy –

Priority Need: There is a need for planning, administration, management, and oversight of Federal, State, and local funded programs to address the housing and community and economic development needs.

Objective: Provide sound and professional planning, administration, oversight and management of Federal, State, and local funded programs and activities.

Goals:

- **AMS-1 Overall Coordination** – Provide program management and oversight for the successful administration of Federal, State, and locally funded programs, including planning services for special studies, annual action plans, five year consolidated plans, substantial amendments, consolidated annual performance and evaluation reports (CAPER), environmental reviews and clearances, fair housing, and compliance with all Federal, State, and local laws and regulations.

FY 2020 CDBG Budget:

The chart below lists the FY 2020 CDBG activities that were funded:

Project ID Number	Project Title/Description	2020 CDBG Budget	2020 CDBG Expenditures
1.	Operation Rehab - Provided funds to assist low to moderate income owner-occupied homes with loans to rehabilitate properties located within city limits.	\$14,038.00	\$0.00
2.	Sold on Frederick - Provided funds for down payment and closing cost assistance for first time homebuyers for primary residence.	\$80,000.00	\$0.00
3.	Acquisition for affordable Housing - Provided funds for acquisition of a dwelling for sale to First-time homebuyer.	\$120,000.00	\$0.00
4.	Homeownership Program Delivery - Provided funds for program management and oversight of the City's homeownership program and rehabilitation programs.	\$25,000.00	\$0.00
5.	Housing Authority Childcare - Provided funds for childcare for working residents to become self-sufficient.	\$10,000.00	\$0.00
6.	Religious Coalition Case Management - Provided funds for case management for homeless persons.	\$26,000.00	\$0.00

7.	Frederick Community Action Case Management - Provided funds for case management for homeless persons.	\$26,000.00	\$0.00
8.	Religious Coalition Renovations Project Manager - Provided funds for project manager for shelter renovations.	\$25,000.00	\$0.00
9.	Frederick Community Action Floor Refinishing - Provided funds to refinishing floor in transitional shelter.	\$25,000.00	\$0.00
10.	General Program Administration and Fair Housing - Provided funds for program Administration.	\$87,759.00	\$0.00

The City of Frederick spent \$0.00 of its FY 2020 allocation, which is 0.00% of the allocation. Additionally, during the 2020 CAPER period, the City expended \$51,536.60 from previous fiscal years.

FY 2020 CDBG-CV Budget:

The chart below lists the FY 2020 CDBG-CV activities that were funded:

Project ID Number	Project Title/Description	2020 CDBG-CV Budget	2020 CDBG-CV Expenditures
1.	CV-Utility Grant Assistance Program – Provided CDBG-CV fund to assist with a Utility Grant Assistance program for \$600 per income eligible households that was affected by COVID-19.	\$39,600.00	\$39,600.00
2.	<p>CV-New Health Clinic - The City provided CDBG-CV funds to be used to develop a new health clinic. The breakdown of the CDBG-CV funds per task are the following:</p> <ul style="list-style-type: none"> • Construction - Build-out of leased space with temporary partitions, including but not limited to clinic rooms for patient visits, a waiting area, and filing and storage areas. We will also construct the requisite number of bathrooms as required by City Zoning. The portion of the CDBG-CV budget is approximately \$148,823.00. • Rent - To pay twelve (12) to eighteen (18) months of rent for the space. After this period of time, the rent will be paid for with other funds. (10,000 sq ft, \$18/sq ft, 18 months) The portion of the CDBG-CV budget is approximately \$270,000. • Equipment - PPE for healthcare personnel and patients, including but not limited to goggles or full face shields, gowns, sterile gloves, NIOSH-approved N-95 filtering 	\$601,361.00	\$0.00

	facepiece respirator or higher. The portion of the CDBG-CV budget is approximately \$182,538.		
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The City of Frederick spent \$39,600.00 of its FY 2020 CDBG-CV allocation, which is 6.18% of the allocation.

Housing Performance Measurements:

The chart below shows the objectives and outcomes that the City of Frederick accomplished through the CDBG activities during this CAPER period:

Objectives	Outcomes						Total by Objective	
	Availability/ Accessibility		Affordability		Sustainability			
	Units	\$	Units	\$	Units	\$	Units	\$
Suitable Living	0	\$ 0.00	0	\$ 0.00	0	\$ 0.00	0	\$ 0.00
Decent Housing	0	\$ 0.00	0	\$ 0.00	0	\$ 0.00	0	\$ 0.00
Economic Opportunity	0	\$ 0.00	0	\$ 0.00	0	\$ 0.00	0	\$ 0.00
Total by Outcome:	0	\$ 0.00	0	\$ 0.00	0	\$ 0.00	0	\$ 0.00

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.

This is the City's first year of the FY 2020-2024 Five-Year Consolidated Plan designed to address the housing and non-housing needs of City residents. This year's CAPER reports on the actions and achievements the City accomplished in Fiscal Year 2020.

The CAPER for the FY 2020 Annual Action Plan for the City of Frederick includes the City's CDBG Program and outlines which activities the City undertook during the program year beginning July 1, 2020 and ending June 30, 2021. The City of Frederick's Planning Department of Housing and Human Services is the lead entity and administrator for the CDBG funds.

The CDBG Program and activities outlined in this FY 2020 CAPER principally benefited low- and moderate-income persons and funding was targeted to neighborhoods where there is the highest percentage of low- and moderate-income residents.

The City during this CAPER period budgeted and expended CDBG funds on the following strategies:

- **Housing Strategy** - Budgeted \$239,038.00, expended \$0.00.
- **Homeless Strategy** - Budgeted \$0.00, expended \$0.00.
- **Other Special Need** - Budgeted \$62,000.00, expended \$0.00.
- **Community Development Strategy** - Budgeted \$50,000.00, expended \$0.00.
- **Economic Development Strategy** - Budgeted \$0.00, expended \$0.00.
- **Administration, Planning, and Management Strategy** - Budgeted \$87,729.00, expended \$0.00.

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
AMS-1 Overall Coordination	Administration	CDBG: \$	Other	Other	5	1	20.00%	1	1	100.00%
CDS-1 Community and Public Facilities/ Infrastructure	Non-Housing Community Development	CDBG: \$	Other	Other	10	0	0.00%	2	0	0.00%
CDS-2 Public Services	Non-Housing Community Development	CDBG: \$	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	875	0	0.00%	175	0	0.00%
CDS-2 Public Services	Non-Housing Community Development	CDBG: \$	Homelessness Prevention	Persons Assisted	175	0	0.00%			
CDS-3 Public Safety	Non-Housing Community Development	CDBG: \$	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	Persons Assisted	0	0	0.00%			
CDS-3 Public Safety	Non-Housing Community Development	CDBG: \$	Public Facility or Infrastructure Activities for Low/Moderate Income Housing Benefit	Households Assisted	0	0	0.00%			

CDS-3 Public Safety	Non-Housing Community Development	CDBG: \$	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	0	0	0.00%			
CDS-3 Public Safety	Non-Housing Community Development	CDBG: \$	Public service activities for Low/Moderate Income Housing Benefit	Households Assisted	0	0	0.00%			
CDS-3 Public Safety	Non-Housing Community Development	CDBG: \$	Other	Other	0	0	0.00%			
CDS-4 Clearance/ Demolition	Non-Housing Community Development	CDBG: \$	Buildings Demolished	Buildings	0	0	0.00%			
CDS-5 Accessibility Improvements	Non-Housing Community Development	CDBG: \$	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	Persons Assisted	0	0	0.00%			
CDS-5 Accessibility Improvements	Non-Housing Community Development	CDBG: \$	Other	Other	0	0	0.00%			
EDS-1 Employment	Economic Development	CDBG: \$	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	0	0	0.00%			
EDS-1 Employment	Economic Development	CDBG: \$	Jobs created/retained	Jobs	0	0	0.00%			
EDS-2 Development	Economic Development	CDBG: \$	Jobs created/retained	Jobs	0	0	0.00%			

EDS-2 Development	Economic Development	CDBG: \$	Businesses assisted	Businesses Assisted	0	0	0.00%			
EDS-3 Redevelopment	Economic Development	CDBG: \$	Businesses assisted	Businesses Assisted	0	0	0.00%			
EDS-3 Redevelopment	Economic Development	CDBG: \$	Other	Other	0	0	0.00%			
EDS-4 Financial Assistance	Economic Development	CDBG: \$	Businesses assisted	Businesses Assisted	0	0	0.00%			
EDS-4 Financial Assistance	Economic Development	CDBG: \$	Other	Other	0	0	0.00%			
EDS-5 Access to Transportation	Economic Development	CDBG: \$	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	0	0	0.00%			
EDS-5 Access to Transportation	Economic Development	CDBG: \$	Other	Other	0	0	0.00%			
HMS-1 Housing	Homeless	CDBG: \$	Homeless Person Overnight Shelter	Persons Assisted	0	0	0.00%			
HMS-1 Housing	Homeless	CDBG: \$	Overnight/Emergency Shelter/Transitional Housing Beds added	Beds	0	0	0.00%			
HMS-1 Housing	Homeless	CDBG: \$	Other	Other	0	0	0.00%			
HMS-2 Operation/Support	Homeless	CDBG: \$	Public service activities for Low/Moderate Income Housing Benefit	Households Assisted	0	0	0.00%			
HMS-2 Operation/Support	Homeless	CDBG: \$	Homeless Person Overnight Shelter	Persons Assisted	0	0	0.00%			

HMS-2 Operation/ Support	Homeless	CDBG: \$	Overnight/Emergency Shelter/Transitional Housing Beds added	Beds	0	0	0.00%			
HMS-2 Operation/ Support	Homeless	CDBG: \$	Homelessness Prevention	Persons Assisted	0	0	0.00%			
HMS-2 Operation/ Support	Homeless	CDBG: \$	Other	Other	0	0	0.00%			
HMS-3 Prevention and Re-Housing	Homeless	CDBG: \$	Public service activities for Low/Moderate Income Housing Benefit	Households Assisted	0	0	0.00%			
HMS-3 Prevention and Re-Housing	Homeless	CDBG: \$	Tenant-based rental assistance / Rapid Rehousing	Households Assisted	0	0	0.00%			
HMS-3 Prevention and Re-Housing	Homeless	CDBG: \$	Other	Other	0	0	0.00%			
HS-1 Housing	Affordable Housing	CDBG: \$	Rental units constructed	Household Housing Unit	0	0	0.00%			
HS-1 Housing	Affordable Housing	CDBG: \$	Homeowner Housing Added	Household Housing Unit	0	0	0.00%			
HS-2 Housing Rehabilitation	Affordable Housing	CDBG: \$	Homeowner Housing Rehabilitated	Household Housing Unit	10	0	0.00%	2	0	0.00%
HS-3 Homeownership	Affordable Housing	CDBG: \$	Homeowner Housing Added	Household Housing	0	0	0.00%	1	0	0.00%

				Unit						
HS-3 Homeownership	Affordable Housing	CDBG: \$	Direct Financial Assistance to Homebuyers	Households Assisted	55	0	0.00%	10	0	0.00%
HS-4 Fair Housing	Affordable Housing	CDBG: \$	Other	Other	5	0	0.00%			
SNS-1 Housing	Non-Homeless Special Needs	CDBG: \$	Rental units constructed	Household Housing Unit	0	0	0.00%			
SNS-1 Housing	Non-Homeless Special Needs	CDBG: \$	Rental units rehabilitated	Household Housing Unit	0	0	0.00%			
SNS-1 Housing	Non-Homeless Special Needs	CDBG: \$	Homeowner Housing Added	Household Housing Unit	0	0	0.00%			
SNS-1 Housing	Non-Homeless Special Needs	CDBG: \$	Homeowner Housing Rehabilitated	Household Housing Unit	0	0	0.00%			
SNS-2 Social Services	Non-Homeless Special Needs	CDBG: \$	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	0	0	0.00%			
SNS-2 Social Services	Non-Homeless Special Needs	CDBG: \$	Other	Other	0	0	0.00%			

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

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	14
Black or African American	12
Asian	0
American Indian or American Native	0
Native Hawaiian or Other Pacific Islander	0
Total:	26
Hispanic	0
Not Hispanic	26
Total:	26

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

Narrative

Based on the IDIS Report PR 23, the City of Frederick's programs benefitted 14 (53.85%) White families, 12 (46.15%) Black or African American families, and 0 (0.0%) Asian families. No Hispanic households were assisted.

CR-15 - Resources and Investments 91.520(a)

Identify the resources made available

Source of Funds	Source	Expected Amount Available	Actual Amount Expended During Program Year 2020
CDBG	FY 2020	\$ 413,734.00	\$ 51,536.60

Table 3 – Resources Made Available

Narrative

The City of Frederick has received the following grant amounts during the time period of July 1, 2020 through June 30, 2021:

- **CDBG Allocation** - \$413,734.00
- **CDBG Program Income** - \$18,000.00
- **Total** - **\$431,734.00**

Of the CDBG expenditures made in the FY 2020 Program Year, \$0.00 was expended from the 2020 CDBG allocation and \$51,536.60 was expended from previous years' CDBG allocations.

Identify the geographic distribution and location of investments

Target Area	Planned Percentage of Allocation	Actual Percentage of Allocation	Narrative Description
City of Frederick	0%	0%	Not Applicable.
Citywide	100%	100%	The City funded ten (10) projects during this CAPER period in this Target Area.

Table 4 – Identify the geographic distribution and location of investments

Narrative

The City of Frederick has allocated its CDBG funds based on principally benefiting Low/Mod income persons; or an activity in which predominantly low- and moderate-income areas or which has a presumed benefit; or an activity with an income requirement of low- and moderate-income persons. All allocated funding has been utilized in a timely manner and within budget.

The following guidelines for allocating CDBG funds were used for the FY 2020 Annual Action Plan:

- The Housing activities will directly benefit LMI household.
- The Community Facilities and Public Service activities will assist organizations which are directly

providing benefit to LMI persons.

Many of the obstacles to addressing underserved needs are outside of the City's control. The largest obstacle was the COVID-19 pandemic. The COVID-19 pandemic has slowed down or stopped projects/activities for the past year. These projects/activities have started backup during the FY 2020 program year. They will be completed during the FY 2021 program year. The other obstacle is the lack of local, state, and federal resources available to the City of Frederick to adequately address these needs. This reduction in funds, combined with increasing numbers of individuals in need of housing, social service, homeless, or infrastructure support, unfortunately means that the City of Frederick is at a disadvantage in addressing underserved needs in the community. However, the City of Frederick maintains close cooperation with the County, the Housing Authority, housing providers, economic development agencies, and social service providers, to address any underserved needs in the City.

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.

Several resources extending beyond CDBG funds were utilized to assist the subrecipients in the implementation of the FY 2020 CDBG program. Applicants which identify specific funding sources/contributions to be leveraged in the project with CDBG funds are awarded a higher score for funding consideration by the Ad Hoc Committee. This was taken into account when weighing the factors of ability to complete the project or activity given the additional funding sources to be used as a component.

The City of Frederick does not require matching funds for eligibility. However, agencies are required to disclose the financial details of the project or activity for which they are seeking CDBG funds. With regard to Bricks and Mortar projects, Davis Bacon wages apply for projects exceeding \$2,000; prevailing wages apply.

In addition to its CDBG funds, the following other public resources were received by agencies in the City of Frederick during the FY 2020 CAPER Period:

- \$18,000 in CDBG Program Income was received during this CAPER period.
- Frederick Housing Authority received \$881,101 in FY 2020 Capital Fund Allocation.
- Frederick Housing Authority received \$926,675 in FY 2021 Capital Fund Allocation.
- Frederick Housing Authority received \$2,070,794 in operating subsidies in FY 2021.

The City does not have any publicly owned land or property within the jurisdiction that was part of the CDBG program. This question is not applicable to the City of Frederick.

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	13	1
Number of special-needs households to be provided affordable housing units	0	0
Total:	13	1

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 the rehab of existing units	2	1
Number of households supported through the acquisition of existing units	11	0
Total:	13	1

Table 6 - Number of Households Supported

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

The biggest problems encountered during this CAPER period in meeting the goals and needs of the City of Frederick is the lack of funding and the shut down because of COVID-19 pandemic. The City is working to overcome these problems through partnerships with its subrecipients.

Discuss how these outcomes will impact future annual action plans.

The City of Frederick is working toward achieving its goal of providing decent, safe, sound, and affordable housing for its low- and moderate-income residents in spite of the COVID-19 pandemic. The COVID-19 pandemic has slowed down or stopped projects/activities for the past year. These projects/activities have started backup during the program year. They will be completed during the FY 2021 program year. The City will continue to provide Community Development Block Grant Funds for housing rehabilitation and homeownership in City.

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

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

Table 7 – Number of Persons Served

Narrative Information

During this CAPER period, the City of Frederick used its CDBG funds to assist one (1) household. Zero (0.0%) were Extremely Low-Income, 1 (100.0%) were Low-Income, and 0 (0.0%) were Moderate-Income.

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

Established in 1983, the Frederick County Coalition for the Homeless is the longest established local coalition working to end homelessness in Maryland.

The Coalition is comprised of individuals, government agencies, faith-based organizations, nonprofit and community-based organizations that share a common concern for the needs of Frederick County's residents who are homeless or at risk of homelessness. The Coalition works to evaluate the needs of our County's residents who are homeless, advocates for resources, and coordinates services to meet these needs.

In addition, the Coalition serves as the Frederick City and County Continuum of Care and as the Local Management Board for the FEMA Emergency Food and Shelter Program.

The Coalition is governed by a Board of Directors that includes Executives from direct shelter services, as well as others representing groups or organizations from: CDBG Entitlement Jurisdictions; Law Enforcement; Local Jails; Hospitals; EMS/Crisis Response; Mental Health Service Providers; Substance Use Disorder Service Providers; Affordable Housing Developers; Disability Advocates and Service Providers; Youth Homeless Advocates and Service Providers; School Administrators/Homeless Liaisons; Victim Service Providers; Street Outreach Teams; Lesbian, Gay, Bisexual, Transgender, Queer, Questioning (LGBTQQ) Advocates and Service Providers; Homeless or Formerly Homeless Persons; Domestic Violence/Human Trafficking Advocates and Service Providers; philanthropic foundations and grantors; local government entities; business entities; and interested members of the community.

To assist with ending Homelessness, the Coalition developed a Strategic Plan with four main goals:

- Increase Housing Options
- Prevent Homelessness
- Improve Leadership and Communication
- Improve Services for Homeless People

The Coalition works with its partners to implement the strategies defined for each goal. The challenge often rests with the availability of funding, changing delivery models and the clients themselves.

The Coalition promotes best practices for prevention and advocates for additional housing opportunities as well as works to increase awareness and understanding of decision makers. Additionally, the Coalition works to increase shelter capacity and services.

Other activities include a year-round 24-hour shelter; Single Room Occupancy (SRO) zoning. Ensuring

that homeless individuals and households receive priority for housing subsidies and prevention services. Developing a “One Stop Shop” for intake with HMIS as “No Wrong Door”.

The City of Frederick and the County of Frederick as CoC members complete a regular “Point In Time Survey” each January to determine the number of homeless individuals and families in the County. The “Point In Time Survey” conducted on January 27, 2021 reported the following numbers of homeless persons:

- **Unsheltered** - 56 individuals
- **Transitional Housing** - 49 individuals
- **Safe Haven** - 0 individuals
- **Emergency Shelter** - 120 individuals

Addressing the emergency shelter and transitional housing needs of homeless persons

The most recent Point in Time Survey Analysis was conducted on January 27, 2021 and reported the following homeless counts for Transitional Housing and Emergency Shelter:

- **Transitional Housing** – 49 individuals
- **Emergency Shelter** – 120 individuals

Frederick Community Action Agency (FCAA), a division within the City’s Department of Housing and Human Services, is a significant partner in the Coalition and participates in regular meetings and applicable subcommittees. FCAA also manages the HMIS system. FCAA staff perform outreach to local shelters, streets, woods, and other areas where homeless people can be found as well as facilitates the annual Point in Time survey. This allows the FCAA to provide for emergency shelter and transitional housing needs as well as better understand the service needs of the homeless so as to facilitate proper assistance.

Currently, there are five (5) organizations in Frederick County that operate emergency shelters and transitional housing programs, they are:

- **Advocates for Homeless Families** - scattered-site transitional housing facilities (41 beds total) for homeless families and physically or medically disabled adults.
- **Frederick Rescue Mission** - two (2) transitional housing facilities (40) beds for adult men with substance abuse problems.
- **Heartly House** - emergency shelter for survivors of domestic violence including children.
- **The Religious Coalition** - 15-bed emergency shelter for families with children and 80-bed emergency shelter for adults (men and women).

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

The City of Frederick through the efforts of Frederick Community Action and the Coalition for the Homeless continued to support the efforts of the local agencies that provide transitional housing for veterans and their households, households with children and households that are victims of domestic violence, and individuals dealing with mental health or substance abuse problems, to move them into more permanent housing solutions. The City continued to assist, by matching homeless service providers with other supportive services that can help their clients to become self-sufficient.

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 Maryland Department of Health and Mental Hygiene (DHMH) provides referral services and case management to persons being discharged from institutions to ensure those persons receive supportive services to prevent homelessness. The City of Frederick continued to support the efforts of the FCAA and other agencies providing assistance to persons discharged that may be at risk of becoming homeless with access to agencies which provide help with financial literacy counseling, emergency rent/mortgage or utility payments, and job training so that they can remain self-sufficient and avoid homelessness.

The Coalition for the Homeless is comprised of individuals, government agencies, faith-based organizations, nonprofit and community-based organizations that share a common concern for the needs of the homeless in Frederick and Frederick County. The Coalition evaluates the needs of those who are homeless, advocates for resources, and coordinates services to meet these needs.

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

Actions taken to address the needs of public housing

The Housing Authority of the City of Frederick is the public housing agency that serves the City of Frederick. The mission of the Housing Authority of the City of Frederick is to provide decent, safe, and sanitary housing to the residents receiving assistance through the Public Housing and Section 8 Housing Choice Voucher Programs in an efficient and professional manner.

The Housing Authority of the City of Frederick owns and operates four (4) public housing communities. They are the following: Lincoln Apartments, Carver Apartments, Lucas Village, and Catoctin Manor. These communities contain a total of 311 units. The apartments vary from efficiency units to 5-bedroom townhomes. 288 of these units are occupied. The occupancy rate is 100% and the Housing Authority has 1,879 people on the waiting list.

The Housing Authority also administers approximately 844 housing choice vouchers. 759 of these vouchers are currently being used and there are 299 people on the waiting list. The waiting list has been closed since 2016. The Housing Authority staff recently went through the waiting list to clean it up. It is anticipated that the waiting list will reopen this summer. These Section 8 Housing Choice Vouchers are used for units that are located in the private rental market through apartment complexes and private ownership.

The City of Frederick awarded \$10,000 in Child Care Grants to extremely low-income persons who are living in public housing. Those funds were leveraged with other grant funds to maximize the amount of funds to be utilized to pay for childcare for parents who are employed, seeking education/certification for better employment or completion of high school diploma.

According to the Housing Authority of the City of Frederick's Five-Year Plan for the period of 2020 - 2024, the goals of the Housing Authority are as follows:

- Continue to increase the number of assisted housings
- Improve the quality of assisted housing by continued upgrades and renovations (extensive goals have been set to upgrade existing units)
- Increase assisted housing choices through the acquisition and renovation/construction of units
- Continue to improve living conditions as properties by working with tenant's groups/resident councils
- Continue to develop self-sufficiency programs to assist tenants in increasing their income
- Guarantee equal opportunity and affirmatively further fair housing

The Frederick Housing Authority used its capital funds to improve the conditions on the public housing units and to provide a more suitable living environment. The Housing Authority FY 2021 Capital Fund allocation was \$926,675.00 and the FY 2020 Capital Fund allocation was \$881,101.

The Housing Authority has been awarded funds for the South Street Centre project, which involves “twinning” of 9% Low Income Housing Tax Credits (“LIHTC”) and Multifamily Bond Program (“MBP”)/4% LIHTC. South Street Family (“SSF”) is a 56-home family development involving new construction, preservation of existing rental housing, and adaptive reuse requesting approximately \$1,500,000 in annual 9% LIHTC and \$2,000,000 in Rental Housing Program (“RHP”) Funds; and South Street Senior (“SSS”), a 96-home new construction elderly development requesting approximately \$7,300,000 in MBP, \$2,500,000 in Rental Housing Works (“RHW”), and \$1,250,000 in Partnership Housing Rental Program (“PHRP”) funds.

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

The Family Services Office of The Housing Authority provides a wide array of services, from birth through retirement. While specific program coordinators have strategies to engage with target populations (i.e. families with young children, adults looking for work, adults wanting to go to college, teens needing academic support, young children preparing to enter school, and senior services), our outreach and social media coordinators collaborate to ensure that all residents know about events and opportunities, and who to contact for which service. The Housing Authority provides the Family Self-Sufficiency Program to 25 public housing families and 32 Housing Choice Voucher families. Homeownership is one of those goals that could be achieved by residents as they become self-sufficient and improve their family’s lives. The Housing Authority has 18 scattered site units outside of our public housing communities, primarily located in the Hillcrest neighborhoods. All of the Housing Choice Voucher Family Self Sufficiency households are scattered throughout Frederick County, with the majority in the City of Frederick.

Actions taken to provide assistance to troubled PHAs

The Housing Authority of The City of Frederick is not designated as troubled by HUD and is performing satisfactorily in accordance with HUD guidelines and standards.

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 updated its Analysis of Impediments to Fair Housing Choice for the FY 2020-2024 Consolidated Plan. The update identified a variety of issues people encounter when seeking decent, safe, sanitary accessible and affordable housing. Public policies have a role in that negative effect related to affordable housing and residential investment in a community. The following have been identified as needing attention and further consideration to remove barriers.

Planning, Zoning, and Building Codes:

Zoning for the City of Frederick is codified in Article 4 of the Land Management Code of the City of Frederick, Maryland. This unified development code was adopted in July 2005. The Zoning Map which is subordinate of the LMC has been updated several times as well. The most recent Zoning Map in effect today was adopted in August 2015.

The Zoning Ordinance of the City of Frederick divides the City into eighteen (18) base zoning districts. Each zoning district contains permitted and conditional land uses, along with associated development standards. These development standards establish minimum lot sizes, maximum lot coverage, parking requirements, minimum yard setbacks and related requirements. In addition to these eighteen districts the City also has identified five (5) Overlay Districts and an additional four (4) Floating Districts.

The Land Management Code was approved by Mayor and Board of Aldermen and became effective as of July 1, 2005; the Zoning Ordinance underwent amendments through July 19, 2019. The City's ordinance was reviewed for conformance with the Fair Housing Act of 1968, as amended, the Americans with Disabilities Act, as amended and HUD Regulations and Guidelines.

Some minor additions and clarifications should be considered and more inclusive definitions inserted in the zoning ordinance:

- Provide a more inclusive definition of "Family".
- Include the Federal definition for "disabled" or "handicapped" written according to the Americans with Disabilities Act.
- Include "transitional housing" in the Use Matrix Table 404-1.
- Include and clarify a definition for "Senior Housing" for the non-institutionalized population and include HUD designated criteria such as income criteria and facility requirements.

Comprehensive Plan:

The City of Frederick adopted its current comprehensive plan on November 19, 2009. The State of

Maryland requires that comprehensive plan be reviewed and updated at least every six years. Currently, the City of Frederick is in the process of updating its 2020 comprehensive plan which will guide the City's growth and development for the next ten to twenty years with the 2010 Comprehensive plan serving as the foundation. The 2020 comprehensive plan will guide decisions on environmental issues, historic preservation, housing, land use, libraries, parks, pedestrian and trail systems, schools, transportation, and zoning.

The City of Frederick encouraged the public to participate in these meetings, to complete a questionnaire, or to leave comments on specific issues and citywide issues by use of an interactive mapping tool. The City has also held several community outreach meetings from August 2019 through December 2019 and intends to hold Planning Commission Special Workshops in January and February of 2020 to acquire additional input.

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

The City of Frederick and social service providers have made efforts to reduce obstacles to meet underserved needs however obstacles remain. Funding resources are scarce, making funding one of the largest obstacles for the City of Frederick to meet its underserved needs. Insufficient funding lessens the ability to fund many worthwhile public service programs, activities, and agencies. The City through its planning efforts will use its limited resources to address the City of Frederick's greatest needs and improve the quality of life for its residents. The following obstacles need to be overcome in order to meet underserved needs:

- Lack of decent, safe, sound, accessible and affordable homeowner and rental housing
- High cost of rehabilitation work
- Aging in place population who need accessibility improvements
- Low wages in the service and retail sector job market

The City of Frederick funded the following projects/activities to address these obstacles:

- **Operation Rehab** – Provided funds for assistance low to moderate income owner-occupied homes with loans to rehabilitate properties located within city limits.
- **Sold on Frederick** – Provided funds for down payment and closing cost assistance for first time homebuyers for primary residence.
- **Homeownership Program Delivery** – Provided funds for program management and oversight of the City's homeownership program and rehabilitation programs.
- **Acquisition for Affordable Housing** – Provided funds for acquisition of a dwelling for sale to First-time homebuyer.

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

The City of Frederick will continue to comply with Title 24 Part 35: Lead-Based Paint Poisoning

Prevention in Certain Residential Structures (current rule). Properties built prior to 1978 will require a lead paint risk assessment in accordance with 24 CFR part 35.

Rehabilitation Programs:

The City of Frederick did the following during this CAPER period:

- Applicants for rehabilitation funding received the required lead-based paint information and understand their responsibilities.
- Staff properly determines whether proposed projects were exempt from some or all lead-based paint requirements.
- The level of federal rehabilitation assistance was properly calculated, and the applicable lead-based paint requirements determined.
- Properly qualified personnel perform risk management, paint testing, lead hazard reduction, and clearance services when required.
- Required lead hazard reduction work and protective measures were incorporated into project rehabilitation specifications.
- Risk assessment, paint testing, lead hazard reduction, and clearance work were performed in accordance with the applicable standards established in 24 CFR Part 35.
- Required notices regarding lead-based paint evaluation, presumption, and hazard reduction were provided to occupants and documented.
- Program documents establish the rental property owner's responsibility to perform and document ongoing lead-based paint maintenance activities, when applicable.
- Program staff monitors owner compliance with ongoing lead-based paint maintenance activities, when applicable.

Homeownership Programs:

The City of Frederick did the following during this CAPER period:

- Applicants for homeownership assistance received adequate information about lead-based paint requirements.
- Staff properly determines whether proposed projects were exempt from some or all lead based paint requirements.
- A proper visual assessment was performed to identify deteriorated paint in the dwelling unit, any common areas servicing the unit, and exterior surfaces of the building or soil.
- Prior to occupancy, properly qualified personnel perform paint stabilization and the dwelling passes a clearance exam in accordance with the standards established in 24 CFR Part 35.
- The home purchaser received the required lead-based paint pamphlet and notices.

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

The City assists other agencies and organizations to reduce poverty. Because the Frederick Community Action Agency (FCAA) is a division of a City department and a community action agency whose mission is to reduce poverty, the City has the expertise on staff to work toward poverty reduction. The CDBG Grant typically funds programs at FCAA and other organizations to provide services to the homeless and other low- and moderate-income individuals and households out of poverty. This grant year homeless services are being funded to provide case management which may include childcare assistance, job training, employment opportunities and financial management programs.

The City of Frederick, during FY 2020 program year will fund the following:

- **Sold on Frederick** - This program provided financial assistance, no interest deferred loans for down payment and closing cost assistance to eligible low to moderate income households who qualify as first-time home buyers in the City of Frederick.
- **Operation Rehab** - This program provided financial assistance to low to moderate income persons with rehabilitative needs on their primary residence in the City of Frederick. Funds were awarded in the form of a zero percent interest, no monthly payment deferred loan due and payable upon sale, refinance, no longer owner occupied, and/or any changes in title.
- **FCAA Transitional Shelter** - This program provided case management activities for the homeless services provided by FCAA to persons, families and disabled homeless persons in need of case management including job training/coaching, financial management, education, counseling and life skills.
- **Religious Coalition Case Management Support** - This activity provided case management supportive services for the eviction prevention and assisted those currently homeless who are very low-, low- and moderate-income persons in The City of Frederick. The supportive services offered included assessment of needs of newly homeless persons and families, provided resource navigation for outside referrals, and facilitate overnight shelter arrangements.
- **Housing Authority of the City of Frederick - Child Care Assistance** - This activity provided leverage funding for the Family Services Office which then provided grant funds for daycare to parents seeking education and employment.
- **Acquisition for Affordable Housing** - Funds were used to acquire an existing housing (single family, town homes or condominiums) to resell to an eligible low to moderate income families.

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

The City's Housing and Human Services Development coordinated the work of the public and private agencies and other organizations in the City. This ensured that the goals and objectives of the Five-Year Consolidated Plan were being addressed by more than one agency. The Grant Administrator will facilitate and coordinate the linkages between these public-private partnerships and develop new partnership opportunities.

Effective implementation of the Five-Year Consolidated Plan and Annual Action Plans involved a variety of agencies both in the community and in the region. Coordination and collaboration between agencies is important to ensure that the needs in the community were being addressed. The key agencies that are involved in the implementation of the Plan as well as additional resources that may be available are described below.

Public Sector:

- **City of Frederick** - The City's Housing and Human Services Development is responsible for the administration of the City's community development programs, including some of the local programs that assist target income residents. The Department's responsibilities included managing and implementing the City's affordable housing policies, included the Five Year Consolidated Plan and related documents. Several other City Departments and Divisions were involved, including Frederick Community Action Agency, Planning, Building/Permits, Code Enforcement, Economic Development, Engineering, Public Works, Police, Fire, Parks and Recreation, etc.
- **The Frederick Housing Authority** - The Frederick Housing Authority is one of the primary owners of affordable housing within the community. The Housing Authority administered the Housing Choice (Section 8) Voucher Program. The City continued to worked in close consultation with the Housing Authority regarding affordable housing issues in Frederick.

Non-Profit Agencies:

There are several non-profit agencies that serve target income households in the greater Frederick area. The City continued to collaborate with these essential service providers. Some of them include:

- The Frederick Center
- Centro Hispano de Frederick
- Asian-American Center of Frederick
- United Way
- NAACP
- Children of Incarcerated Parents
- Family Partnership
- Boys & Girls Club of Frederick
- Wells House
- Salvation Army
- Frederick Rescue Mission
- Maryland Legal Aid
- SHIP of Frederick County
- Frederick County Coalition for the Homeless
- Mental Health Association
- Community Foundation of Frederick County

- Religious Coalition of Frederick County
- Seton Center
- Beacon House
- Habitat for Humanity
- YMCA of Frederick County
- Downtown Partnership
- Maryland Center for Legal Assistance

Private Sector:

The private sector is an important collaborator in the services and programs associated with the Five Year Consolidated Plan. The private sector brought additional resources and expertise that was used to supplement existing services or fill gaps in the system. Lenders, affordable housing developers, business and economic development organizations, and private service providers offer a variety of assistance to residents such as health care, small business assistance, home loan programs, and assisted housing, among others. The City continued to work closely with these agencies to meet Five Year Consolidated Plan goals and objectives. Funds for affordable housing were also provided through the Federal Home Loan Bank through its member banks.

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

During this CAPER period, the primary responsibility for the administration of the Annual Action Plan was assigned to the Department of Housing and Human Services staff at the City of Frederick. This Department coordinates activities among the public and private organizations, in their efforts to implement different elements and to realize the prioritized goals of the Annual Action Plan. The City is committed to continuing its participation and coordination with public, housing, and social service organizations. The City solicits funding requests for CDBG funds. These requests are reviewed and discussed by the Department of Housing and Human Services staff.

The City recognized the importance of coordination among the City and the community's housing and social service providers in meeting the community's priority needs. Throughout the FY 2020-2024 Five Year Consolidated Planning period, the City undertook actions that called for the City to coordinate with local housing and social service providers in the identification, documentation, and mitigation of community needs. This resulted in a more streamlined and effective service delivery system.

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 has prepared a new Analysis of Impediments to Fair Housing Choice for 2020. The City is committed to affirmatively furthering fair housing.

During its FY 2020 CDBG Program Year the City proposed to fund projects/activities that affirmatively further fair housing. This included:

- Assisted with rehabilitation costs for low/mod owner-occupied housing.
- Provided funds for downpayment and closing costs assistance for low/mod homebuyers.
- Provided funds for acquisition and resale of a residential property for a low/mod homebuyer.

CR-40 - Monitoring 91.220 and 91.230

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

The City of Frederick's Department of Housing and Human Services staff has the primary responsibility for monitoring the City's Consolidated Plan and Annual Action Plan and maintain records on the progress toward meeting the goals and the statutory and regulatory compliance of each activity. Service area documentation is maintained along with income surveys if used. Timeliness of expenditures is achieved through scheduling activities, drawdown of funds, and maintenance of budget spread sheets which indicate the dates of expenditures. Program modifications are considered if project activities are not able to be completed within the allowable time limits of the grant. Department of Housing and Human Services staff is also responsible for the on-going monitoring of any sub-recipients for similar compliance.

The City of Frederick's Department of Housing and Human Services staff has a "monitoring checklist" that is utilized when programs and activities are reviewed. This checklist was developed in accordance with 2 CFR, Part 200 UNIFORM ADMINISTRATIVE REQUIREMENTS, COST PRINCIPLES, AND AUDIT REQUIREMENTS FOR FEDERAL.

CDBG funded activities are monitored periodically, during the construction phase, and a final inspection is performed which details the cost benefit and benefit to low- and moderate-income persons. During the on-site inspections, compliance with the local building and housing codes are reviewed. Copies of financial statements and audit reports are required and kept on file. For those activities which trigger Davis-Bacon Wage Rates, employee payrolls are required prior to payments and on-site employee interviews will be held. These monitoring standards are required for all City administered projects and sub-recipient activities.

For each activity authorized under the National Affordable Housing Act, the City of Frederick has established fiscal and management procedures that will ensure program compliance and fund accountability. Additionally, the Department will ensure that the reports to the U.S. Department of Housing & Urban Development (HUD) are complete and accurate.

The monitoring process is not a "one-time" event. The process is an on-going system of planning, implementation, communication and following-up.

All of the City of Frederick's CDBG activities met one of HUD's national objectives primarily serving low to moderate income persons; the City complied with the overall benefit certification.

No activities were undertaken that required notification or implementation of relocation or displacement requirements.

Citizen Participation Plan 91.105(d); 91.115(d)**Description of the efforts to provide citizens with reasonable notice and an opportunity to comment on performance reports.**

The City of Frederick placed the CAPER document on public display for a period of 15 days beginning on Wednesday, September 8, 2021 through Wednesday, September 22, 2021. A copy of the Public Notice was published in the local newspaper on Tuesday, September 7, 2021, a copy of which is attached in the Citizen Participation Section of this CAPER document.

The FY 2020 CAPER is on display on the City's web page: <https://www.cityoffrederickmd.gov>.

CR-45 - CDBG 91.520(c)

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

The City of Frederick did not make any changes to the FY 2020-2024 Five Year Consolidated Plan and its program objectives during this reporting period.

Describe accomplishments and program outcomes during the last year.

During this CAPER period, the City of Frederick expended CDBG funds on the following activities:

- **Acquisition** - \$103.88, which is 0.20% of the total expenditures.
- **Housing** - \$28,394.00, which is 55.09% of the total expenditures.
- **Public Facilities and Improvements** - \$16,680.65, which is 32.37% of the total expenditures.
- **General Administration and Planning** - \$6,358.07, which is 12.34% of the total expenditures.
- **Total: \$51,536.60**

The City of Frederick Timeliness Ratio of unexpended funds as a percentage of the FY 2020 CDBG allocation is 1.65, which is over the maximum 1.5 ratio.

During this CAPER period, the CDBG program targeted the following with its funds:

- **Percentage of Expenditures Assisting Low- and Moderate-Income Persons and Households Either Directly or On an Area Basis** - 100.00%
- **Percentage of Expenditures that Benefit Low- and Moderate-Income Areas** – 0.00%
- **Percentage of Expenditures that Aid in the Prevention or Elimination of Slum or Blight** - 0.00%

During this CAPER period, the income level beneficiaries data were the following:

- **Extremely Low Income (<=30%)** – 0.00%
- **Low Income (30-50%)** – 100.00%
- **Moderate Income (50-80%)** – 0.00%
- **Total Low- and Moderate-Income (<=80%)** - 100.0%
- **Non Low- and Moderate-Income (>80%)** - 0.0%

During this CAPER period, the City had the following CDBG accomplishments:

- **Actual Jobs Created or Retained** - 0
- **Households Receiving Housing Assistance** - 1
- **Persons Assisted Directly, Primarily by Public Services and Public Facilities** - 0

- **Persons for Whom Services and Facilities were Available - 0**
- **Units Rehabilitated - Single Units - 1**
- **Units Rehabilitated - Multi Units Housing - 0**

The City of Frederick did not make any prior year adjustments, no lump sum agreements, and no relocation during this CAPER period. None of the CDBG Funds were allocated to activities that did not meet the National Objective requirements.

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

No

CR-50 - IDIS Reports

Attached are the following U.S. Department of Housing and Urban Development (HUD) Reports from IDIS for FY 2020 for the period between July 1, 2020 and June 30, 2021.

The following reports are:

- **IDIS Report PR26** - CDBG Financial Summary
- **IDIS Report PR26** - CDBG-CV Financial Summary
- **IDIS Report PR01** - HUD Grants and Program Income report
- **IDIS Report PR03** - Activity Summary Report
- **IDIS Report PR06** - Summary of Consolidated Plan Projects
- **IDIS Report PR23** - Summary of Accomplishments

CR-55 - Citizen Participation

The following pages include the public display notice, sign-in sheet, and any public or written comments received by the City of Frederick.