



# CITY OF VINELAND

## Community Development Block Grant and HOME Programs

2019 CAPER

Consolidated Annual Performance and Evaluation Report

Office of Economic and Community Development

## **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.

Despite the impacts of the coronavirus pandemic on the final quarter-plus of the program year, during 2019, the City of Vineland and the HOME consortium it leads made excellent progress toward meeting all Action Plan goals and implementing the proposed projects.

Continued strong performances from the City's non-profit partners allowed the program to exceed the anticipated level of service for public service activities that were supported. It should be noted that CDBG funding typically is a very small but very important part of the funding needed to operate the wide variety of eligible activities in the public services category.

The much needed housing rehab program exceeded the anticipated level of service as well, completing 31 units despite an almost total cessation of the program as the pandemic brought all facets of residential rehabilitation to a halt.

There was one new affordable unit completed during the program year and the HOME Consortium, specifically the City of Bridgeton, assisted 1 homebuyer with the purchase of an affordable unit.

**NOTE:** The accomplishments reported below are an aggregate of accomplishments reported for the individual activities in IDIS and accurately reflect the levels of services during the 2019 Program Year. They are not taken from the PR-23 reports, which are frequently inaccurate.

### **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
Affordable Housing Rental	Affordable Housing	CDBG: \$ / HOME: \$	Rental units constructed	Household Housing Unit	10	0	0.00%			
Affordable Housing Rental	Affordable Housing	CDBG: \$ / HOME: \$	Rental units rehabilitated	Household Housing Unit	10	0	0.00%			
Affordable Housing/Owner Occupied Housing	Affordable Housing	CDBG: \$ / HOME: \$83562	Homeowner Housing Added	Household Housing Unit	10	12	120.00%	1	1	100.00%
Affordable Housing/Owner Occupied Housing	Affordable Housing	CDBG: \$ / HOME: \$83562	Direct Financial Assistance to Homebuyers	Households Assisted	10	12	120.00%			
Economic Development	Economic Development	CDBG: \$	Businesses assisted	Businesses Assisted	3	0	0.00%			
Elimination of Slum and Blight(Code Enf. & Demo)	Non-Housing Community Development	CDBG: \$	Buildings Demolished	Buildings	0	2		1	1	100.00%
Elimination of Slum and Blight(Code Enf. & Demo)	Non-Housing Community Development	CDBG: \$	Housing Code Enforcement/Foreclosed Property Care	Household Housing Unit	4000	17480	437.00%	15000	17480	116.53%

Homeless Support Activities	Homeless	CDBG: \$	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	0	0				
Homeless Support Activities	Homeless	CDBG: \$	Homeless Person Overnight Shelter	Persons Assisted	250	24581847	9,832,738.80%	300	611	203.67%
Homeless Support Activities	Homeless	CDBG: \$	Overnight/Emergency Shelter/Transitional Housing Beds added	Beds	0	0				
Homeless Support Activities	Homeless	CDBG: \$	Homelessness Prevention	Persons Assisted	0	0				
Housing Rehabilitation Programs for LMI Homeowners	Affordable Housing	CDBG: \$ / HOME: \$491807	Homeowner Housing Rehabilitated	Household Housing Unit	250	213	85.20%	30	31	103.33%
Planning and Administration	Planning and Administration	CDBG: \$ / HOME: \$	Other	Other	5	5	100.00%	1	1	100.00%
Public and Assisted Housing	Public Housing	CDBG: \$	Rental units rehabilitated	Household Housing Unit	2	0	0.00%			
Public Facility Improvements	Non-Housing Community Development	CDBG: \$	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	Persons Assisted	3000	33983	1,132.77%	100	0	0.00%

Public Infrastructure Improvements	Non-Housing Community Development	CDBG: \$	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	Persons Assisted	0	0				
Public Services	Non-Homeless Special Needs	CDBG: \$	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	Persons Assisted	0	92				
Public Services	Non-Homeless Special Needs	CDBG: \$	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	830	10752	1,295.42%	975	1130	115.90%
Public Services	Non-Homeless Special Needs	CDBG: \$	Homeless Person Overnight Shelter	Persons Assisted	0	0				
Public Services	Non-Homeless Special Needs	CDBG: \$	Overnight/Emergency Shelter/Transitional Housing Beds added	Beds	0	0				

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

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

High priority needs identified include preservation of housing stock and support of public services. During 2019, the bulk of the City's CDBG funds went to addressing these priority needs.

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

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

91.520(a)

	CDBG	HOME
White	1,109	8
Black or African American	588	6
Asian	12	0
American Indian or American Native	18	0
Native Hawaiian or Other Pacific Islander	15	0
<b>Total</b>	<b>1,742</b>	<b>14</b>
Hispanic	673	5
Not Hispanic	1,069	9

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

### Narrative

**NOTE:** The accomplishments reported above are an aggregate of accomplishments reported for the individual activities in IDIS and accurately reflect the levels of services during the 2019 Program Year. They are not taken from the PR-23 reports, which are frequently inaccurate.

The "Native Hawaiian or Other Pacific Islander" category is actually the number identifying themselves as "Other or Multi-Racial."

With very nearly 39% of CDBG direct beneficiaries and 36% of HOME direct beneficiaries identifying themselves as Hispanic, the program is clearly succeeding in reaching those populations within the City of Vineland, where 37% of the population is Hispanic. Similarly with African-American residents, which comprise just 15% of the population but 34% of direct CDBG beneficiaries and 43% of direct HOME beneficiaries.

## 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	555,787	406,086
HOME	public - federal	639,076	391,634

Table 3 - Resources Made Available

### Narrative

During the period from July 1, 2019 to June 30, 2020, the City of Vineland received an allocation of CDBG funding of \$485,787. The City also budgeted \$70,000 in actual and anticipated Program Income for a total of \$555,787 available for Fiscal Year (FY) 2019 CDBG activities. During FY19, the City spent a total of \$406,086.09 in CDBG funds.

The Vineland-Millville-Bridgeton-Fairfield-Pittsgrove HOME Consortium received an allocation of \$557,076 for 2019. In addition, \$82,000 in actual and anticipated Program Income was received for a total of \$639,076 of new funds available during the year. The Consortium expended a total of \$391,720.36 in HOME funds during the 2019 program year.

### Identify the geographic distribution and location of investments

Target Area	Planned Percentage of Allocation	Actual Percentage of Allocation	Narrative Description
Center City	3	7	
City of Bridgeton - Consortium Municipality	13	6	City of Bridgeton - Consortium Municipality
City of Millville - Consortium Municipality	11	14	City of Millville - Consortium Municipality
Citywide	71	73	Citywide
Fairfield Township - Consortium Municipality	1	0	Fairfield Township - Consortium Municipality
Pittsgrove Township - Consortium Municipality	1	0	Pittsgrove Township - Consortium Municipality

Table 4 – Identify the geographic distribution and location of investments

### Narrative

Spending based on geographic allocations was more or less as anticipated, given the fluctuations in annual spending and the impact of the global pandemic on such programs as residential rehabilitation.

## 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 leverages federal funding through its own local resources and encourages service providers to seek private funding for social services as well. With the exception of residential rehab projects, Vineland's CDBG and HOME funds do not serve as the sole source of funding for any of its recipients, partners or direct services. All of the social service providers have various streams of funding available to them and in many cases the funding received from the CDBG program represents a small portion of their overall budget. The housing rehab program is supplemented to a significant level by the City's Affordable Housing Trust Fund.

No publicly owned land or property was used to address the needs identified in the plan except for the use of some municipal facilities to provide some public services..

<b>Fiscal Year Summary – HOME Match</b>	
1. Excess match from prior Federal fiscal year	11,509,715
2. Match contributed during current Federal fiscal year	0
3. Total match available for current Federal fiscal year (Line 1 plus Line 2)	11,509,715
4. Match liability for current Federal fiscal year	61,273
5. Excess match carried over to next Federal fiscal year (Line 3 minus Line 4)	11,448,441

**Table 5 – Fiscal Year Summary - HOME Match Report**



Match Contribution for the Federal Fiscal Year								
Project No. or Other ID	Date of Contribution	Cash (non-Federal sources)	Foregone Taxes, Fees, Charges	Appraised Land/Real Property	Required Infrastructure	Site Preparation, Construction Materials, Donated labor	Bond Financing	Total Match

Table 6 – Match Contribution for the Federal Fiscal Year

**HOME MBE/WBE report**

Program Income – Enter the program amounts for the reporting period				
Balance on hand at begin-ning of reporting period \$	Amount received during reporting period \$	Total amount expended during reporting period \$	Amount expended for TBRA \$	Balance on hand at end of reporting period \$
165,726	65,191	118,775	0	112,142

Table 7 – Program Income

<b>Minority Business Enterprises and Women Business Enterprises – Indicate the number and dollar value of contracts for HOME projects completed during the reporting period</b>						
	Total	Minority Business Enterprises				White Non-Hispanic
		Alaskan Native or American Indian	Asian or Pacific Islander	Black Non-Hispanic	Hispanic	
<b>Contracts</b>						
Dollar Amount	214,635	0	18,770	0	29,220	166,645
Number	15	0	1	0	1	13
<b>Sub-Contracts</b>						
Number	0	0	0	0	0	0
Dollar Amount	0	0	0	0	0	0
	Total	Women Business Enterprises	Male			
<b>Contracts</b>						
Dollar Amount	214,635	44,565	170,070			
Number	15	2	13			
<b>Sub-Contracts</b>						
Number	0	0	0			
Dollar Amount	0	0	0			

**Table 8 - Minority Business and Women Business Enterprises**

<b>Minority Owners of Rental Property – Indicate the number of HOME assisted rental property owners and the total amount of HOME funds in these rental properties assisted</b>						
	Total	Minority Property Owners				White Non-Hispanic
		Alaskan Native or American Indian	Asian or Pacific Islander	Black Non-Hispanic	Hispanic	
Number	0	0	0	0	0	0
Dollar Amount	0	0	0	0	0	0

**Table 9 – Minority Owners of Rental Property**

<b>Relocation and Real Property Acquisition</b> – Indicate the number of persons displaced, the cost of relocation payments, the number of parcels acquired, and the cost of acquisition						
Parcels Acquired		0		0		
Businesses Displaced		0		0		
Nonprofit Organizations Displaced		0		0		
Households Temporarily Relocated, not Displaced		0		0		
Households Displaced	Total	Minority Property Enterprises				White Non-Hispanic
		Alaskan Native or American Indian	Asian or Pacific Islander	Black Non-Hispanic	Hispanic	
Number	0	0	0	0	0	0
Cost	0	0	0	0	0	0

**Table 10 – Relocation and Real Property Acquisition**

## 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	41	45
Number of Special-Needs households to be provided affordable housing units	0	0
<b>Total</b>	<b>41</b>	<b>45</b>

Table 11 – Number of Households

	One-Year Goal	Actual
Number of households supported through Rental Assistance	10	12
Number of households supported through The Production of New Units	1	1
Number of households supported through Rehab of Existing Units	30	31
Number of households supported through Acquisition of Existing Units	0	1
<b>Total</b>	<b>41</b>	<b>45</b>

Table 12 – Number of Households Supported

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

All affordable housing goals were met or exceeded during the 2019 program year.

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

Demand continues for both new affordable units and for rehab to existing, occupied units. The program will likely continue both activities for as long as funding permits.

**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.**

<b>Number of Households Served</b>	<b>CDBG Actual</b>	<b>HOME Actual</b>
Extremely Low-income	12	7
Low-income	12	2
Moderate-income	7	5
<b>Total</b>	<b>31</b>	<b>14</b>

**Table 13 – Number of Households Served**

### **Narrative Information**

Affordable housing resources were used to benefit eligible households from across the various sub-categories of income eligibility. This reflects both the reality of the breadth of need in the community and the program's efforts to reach residents of all income levels.

## **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 homeless shelter operated by Rural Development with assistance from Vineland's CDBG funds includes needs assessment as part of their services to the area's homeless. In addition, the Code Blue emergency sheltering program that operates in the City assesses needs and makes referrals to the shelter for more permanent housing and more intense case management.

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

The City of Vineland provides support to a variety of services for the homeless and at-risk population. Assistance comes in the form of participation on various County councils and committees as well as direct funding to non-profit agencies that provide direct service to the homeless or at-risk populations. Activities that the City of Vineland supports include the provision of emergency shelter beds, support services, soup kitchen activities as well as other direct related wrap around services that support the homeless population.

Specific CDBG allocations for these activities in 2019 included:

\$5,000.00 for operational support for the County's only homeless shelter, operated by Rural Development.

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

During the 2019 program year, efforts of the Community Development Program to prevent homelessness have focused on housing rehab, where the program spent more than \$180,000 in CDBG funds, nearly \$270,000 in HOME funds and local Affordable Housing Trust Fund money to rehab homes. The repairs provided generally addressed issues such as heating, plumbing, roofs and other vital components without which occupancy would not be possible and homelessness would be a real threat.

Additionally, the program provided \$5,000 through one of its non-profit partners to prevent utility shutoffs on an emergency basis and allow income-eligible families to remain in their homes.

On a broader scale, the City's Community Development program is active in countywide planning and implementation to head off homelessness for those most at risk, including populations being discharged from public institutions and systems.

**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 supports the transition to permanent housing in a number of ways:

- \* By supporting the Cumberland County homeless shelter, where case management and needs assessments encourage clients to identify and address the issues that caused their homelessness and assists in making the links and taking the steps to accomplish that goal;
- \* By supporting Habitat for Humanity in the production of housing that increases the supply of homes available to those at the lower end of the income scale;
- \* By participating in the County Continuum of Care and other joint efforts at addressing homelessness, transition and permanency.

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

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

The City wishes to maintain an excellent quality of life and living environment for its public housing tenants. Toward that end the City allocated \$4,000 in CDBG funds during 2019 in support of a computer learning center at the main Housing Authority housing site. The center works to improve computer skills among residents, especially students.

The City Community Development program is also continuing to help the Vineland Housing Authority with Environmental Record Reviews of some Authority properties that may be sold to raise capital for improvements to other Authority properties.

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

The Vineland Housing Authority has established residents' councils in each public housing project. These councils assist in making decisions regarding priority needs and funding to be allocated to facilitate projects.

The Housing Authority provides interested residents with information on affordable housing opportunities throughout the region.

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

The Vineland Housing Authority is not a troubled PHA.



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

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

The City has identified the public policies that impact the cost of housing and the incentives to develop, maintain, and improve affordable housing. Many of these policies fall beyond the purview or control of the City. Indeed, some of the issues that have been identified as barriers are beyond the authority of any single agency or level of government.

Issues that can be addressed at the municipal level include local tax policy, land use controls, building codes fees and charges, growth limits, zoning ordinances and policies that affect the return on residential investment. The City has addressed its zoning and land use regulations in an attempt to make them as equitable and open as possible. Development standards, though they sometimes add costs to construction or rehabilitation, are necessary for the safety and health of residents and are in place in most of the participating jurisdictions. Efforts have been made to streamline and facilitate the permitting process locally. The City has opted to employ impact and linkage fees for new development in an attempt to pay for the construction of roads, sewers and other infrastructure improvements required by new development.

The City continues to seek applicable state and federal funding in support of these housing and community development programs. In addition the City works with not-for-profit organizations to identify and obtain additional sources of funds.

The City continues to implement a variety of economic development programs and initiatives in order to create new and better job opportunities for residents.

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

The primary obstacle to meeting underserved needs is a lack of funds. There are many needs in all of the areas - public facilities, public services, infra-structure, and economic development – and municipal resources go only so far.

The City and its consultants are constantly looking for new and better ways to attract resources for the many community needs. These efforts have succeeded in bringing many needed resources, some of which are used to leverage CDBG and HOME funds. Activities undertaken in 2019 with such resources include infrastructure improvements, public facilities improvements, public services and housing.

In addition to addressing resource shortages, the City also attempts to alleviate demand by attracting jobs and training opportunities to allow residents to improve their incomes. The development of more

and better jobs for low and moderate income persons helps reduce the scale or scope of needs. The City's aggressive efforts in Economic Development and regional growth in training opportunities have shown some progress in bringing more jobs and a better trained workforce to the City and region.

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

Using both CDBG and HOME funds and local Affordable Housing Trust Fund money, the Vineland Office of Community Development administers the Residential Housing Rehabilitation Program for owner occupied and rental housing units. The program complies with HUD's regulations by conducting a Lead Risk Assessment on all participating properties constructed prior to 1978 where painted surfaces will be disturbed. Lead-safe work practices, interim controls or abatement are performed as appropriate and lead clearance testing is conducted after completion of the rehabilitation work. While there are no requirements for lead risk assessments and clearance testing for those units being assisted solely with local Affordable Housing Trust Fund money, the City has voluntarily added those steps to further efforts to protect residents, particularly children.

During 2019, more than 30 homes were rehabbed under the program, including those completed using local (non-federal) funds. The vast majority of them had risk assessments and clearances done.

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

The City's anti-poverty strategy is inextricably linked to the Economic Programs that have been implemented and operated for several years. The objective of poverty reduction requires programming for broad areas including job training and placement, public services, education, and basic skills development. The overriding principle however is to create new jobs and opportunities for households with incomes below the poverty level. It is only through comprehensive, coordinated strategies that nurture skills and provide opportunities to gain and retain employment and thus improve the quality of life that people can improve their situation.

Cumberland County and the City of Vineland are part of the **South Jersey Economic Development District (SJEDD)**. As such they are included in the district's Comprehensive Economic Development Strategy (CEDS) document, and benefit from projects funded by the US Economic Development Administration (USEDA). The CEDS document is a comprehensive analysis of the area economy, including that of City of Vineland, and a strategy for the continued growth prosperity and economic strength of the district, which includes Atlantic, Cape May, Cumberland, and Salem Counties.

The development of more and better jobs for low and moderate income persons would help reduce the scale or scope of needs. The City's aggressive efforts in Economic Development and regional growth in training opportunities have shown some progress in bringing more jobs and a better trained workforce to the City and region.

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

During the 2019 program year, the City of Vineland Community Development Program has maintained open communications with local and regional community development agencies. Through participation in the statewide Community Development Association, program staff interact with other professionals in the field to exchange best practices and other valuable information.

City staff also remained active in countywide social service networks to maximize program efficiency and encourage appropriate referrals

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

As a common partner with so many of the public and private housing and social service providers, the Vineland Community Development Program has been a natural conduit for communication and interaction among these entities. The CD Program continued to serve in that capacity in 2019 while respecting the autonomy and uniqueness of each partner.

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

There is no overt real estate or lending practice that blatantly limits housing choices in City of Vineland. A review of existing lending practices and HMDA data revealed there were no distinct patterns or trends limiting lending or the distribution of housing resources.

An annual reviews of Vineland’s Analysis of Impediments to Fair Housing Choice prior to the completion of the 2019 Annual Action Plan showed that many of the issues that have been identified for a number of years still persisted to varying degrees. Whenever possible Vineland has used its resources to help alleviate the identified housing issues.

The analysis did determine several factors or policies that may in one way or another limit the full range of housing choices for residents. In instances where solutions can be implemented, the City has worked to eliminate the impediments.

**Impediment – Lack of Education Regarding Fair Housing Laws**

As in many municipalities, there is an increased need for education, outreach and referral regarding the Fair Housing Act and the New Jersey Law Against Discrimination (LAD). The LAD prohibits discrimination when selling or renting property. The law covers owners, agents, employees and brokers and makes it unlawful to refuse to rent, show or sell property based on a person's race, creed, color, national origin, nationality, ancestry, marital status, domestic partnership status, familial status, sexual orientation, sex, or mental and physical disability, including AIDS and HIV-related illness.

**Actions to Address Impediment**

The City has continued to support education of the public with regard to fair housing and to assist the public with connection to agencies that help with fair housing problems. Information provided to the public is presented in an accessible, readable format so that it is easy to understand. The information is updated annually to ensure that it contains the most recent information. The information is distributed in English and Spanish.

The City has assigned a bi-lingual staff member to serve as the Fair Housing Officer within the Community Development Program.

The City has contacted the HUD Regional Office of Fair Housing and Equal Opportunity, the local Urban League and the Cumberland County Office on Aging and Disabled and the New Jersey Division of Civil Rights to arrange to work cooperatively in order to disseminate fair housing information, including information about the New Jersey Law Against Discrimination.

The City continues to work to assist residents with special needs to ensure they have full access to housing and needed services.

#### **Add 1**

Impediment - Complaint Process: Some confusion exists concerning whom to turn to when a violation of fair housing law is alleged, as well as how to access the State's fair housing complaint system. In addition, the process to file a fair housing complaint is viewed as complicated. There is a general fear of retaliation that may prevent complainants from filing a fair housing complaint. Actions to Address Impediment: The City continues to work to raise the visibility of Fair Housing and the Fair Housing Complaint Process, including increasing landlord and resident awareness and knowledge of Fair Housing. The City's Fair Housing Officer continues to work with the regional fair housing agency and the State of New Jersey Regional Fair Housing Office to plan and conduct presentations and distribute information about fair housing, through elementary schools, public libraries, affordable housing providers and community/recreation centers. This includes the State of New Jersey Regional Fair Housing Office located in Atlantic City, New Jersey. The City also provides the Truth-in-Renting publication that serves as a guide to the rights and responsibilities of residential landlords and tenants in New Jersey. This material is from the Office of Landlord/Tenant Information, within the New Jersey Department of Community Affairs' Division of Codes and Standards, Impediment - Lack of Decent Affordable Housing. Approximately 45% of Vineland households are at 80% or less of the Area Median Income, suggesting that the City has an inherent need for a significant amount of affordable housing. The waiting lists for Vineland Housing Authority units and for City Residential Rehab Program assistance demonstrate a need for additional units. As the housing stock continues to age, unit rehab and replacement will continue to be in demand. While this shortage is linked to economic factors, rather than issues of fairness, the fact is that minority and disabled individuals comprise a greater proportion of low- and moderate-income groups and are, therefore, affected to a greater degree by a shortage of affordable housing. Action to Address Impediment: The City continued to maintain existing affordable housing through the residential rehab activities operated by the Community Development Program. The City also continued to support

the creation of new affordable units through technical assistance and subsidies to housing developers who are producing affordable housing. Sources of funding for these activities include CDBG, HOME and the City's Affordable Housing Trust Fund.

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

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

The City's Community Development Program standards and procedures for compliance monitoring are designed to ensure that:

- 1) objectives of the National Affordable Housing Act are met,
- 2) program activities are progressing in compliance with the specifications and schedule for each program, and
- 3) recipients are in compliance with other applicable laws, implementing regulations, and with the requirements to affirmatively further fair housing and minimize displacement of low-income households.

The CD Program continued to carry out monitoring activities and internal audits to ensure that it complies with all HOME and CDBG program requirements. The Program has followed the procedures and requirements published by HUD. The City worked closely with particular entities in the execution and monitoring of the programs described in the Action Plan

Action Plan activities were monitored through the use of checklists and forms to facilitate uniform monitoring.

Fiscal monitoring included review and approval of budgets, compliance with Grant Agreements, approval of vouchers and reviews of fiscal reports and sub-recipient audits.

Monitoring of sub-recipients occurred through regular telephone and on-site monitoring visits.

**Minority Business Outreach** - The City encourages participation by minority-owned businesses in CDBG and HOME assisted activities and maintains records concerning the participation of minority-owned businesses to assess the results of its efforts and to complete the semiannual "Minority Business Enterprise Report" to HUD. Qualified minority contractors are encouraged to bid on properties participating in the Housing Rehabilitation Program.

**Comprehensive Planning Requirements** - To ensure compliance with the comprehensive planning

requirements of the Consolidated Plan process, the Community Development Program reviews the process on an ongoing basis. The review ensures compliance with federal requirements concerning citizen participation and consistency of actions taken with those specified in the "Citizen Participation Plan." Records documenting actions taken are maintained for each program year.

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

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

The City of Vineland placed the CAPER document on public display for a period in excess of the required 15 days, from September 10, 2020 through September 29, 2020. Because of Covid-19 restrictions to City Hall access, the CAPER was made available on the City website only. The public was notified of the public comment period by an advertisement which appeared in the local publication *The Daily Journal*. A copy of the advertisement is provided with this report. No comments from the public were received during the comment period.

**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.**

Ongoing assessments of community needs and ongoing successes of the City's CDBG program in addressing those needs suggest that no significant changes are needed in the program's objectives. The program will continue to seek efficient, effective means to provide housing, facilities and services to our most vulnerable residents. The City will continue to seek community partners capable of assisting in those efforts.

While always aware of opportunities to improve, the City believes that the overall direction and implementation of its CDBG program meet both the requirements of the federal government and the needs of our local residents.

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

No

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



## **CR-50 - HOME 91.520(d)**

### **Include the results of on-site inspections of affordable rental housing assisted under the program to determine compliance with housing codes and other applicable regulations**

Please list those projects that should have been inspected on-site this program year based upon the schedule in §92.504(d). Indicate which of these were inspected and a summary of issues that were detected during the inspection. For those that were not inspected, please indicate the reason and how you will remedy the situation.

No units were scheduled for inspection this year.

### **Provide an assessment of the jurisdiction's affirmative marketing actions for HOME units. 92.351(b)**

No HOME-funded projects met the threshold for affirmative marketing requirements, but the Vineland Community Development program and its partners make every effort to reach out to the City's non-English speaking residents with information both on the housing rehab program and on new units being constructed.

Those efforts have shown results as fully 33% of HOME owner-occupied rehab beneficiaries in 2019 were Hispanic. This compares favorably to the Hispanic homeowner rate in the City, where approximately 15% of owner-occupied units are held by Hispanic households.

### **Refer to IDIS reports to describe the amount and use of program income for projects, including the number of projects and owner and tenant characteristics**

A total of \$104,619.12 in program income was spent on projects, specifically 7 owner-occupied housing rehabs. Owners were 4 White and 3 Black/African-American with 3 Hispanic owners among them. Three of the owners were moderate income and 4 were very low income (less than 30% AMI).

### **Describe other actions taken to foster and maintain affordable housing. 91.220(k) (STATES ONLY: Including the coordination of LIHTC with the development of affordable housing). 91.320(j)**

Other affordable housing measures for 2019 included:

- Use of CDBG and local Affordable Housing Trust fund resources to rehab additional low-mod housing units.
- Funding and technical assistance to non-profit housing providers in developing new affordable units, including more than \$23,000 in CHDO funds for new unit construction and purchase assistance.

