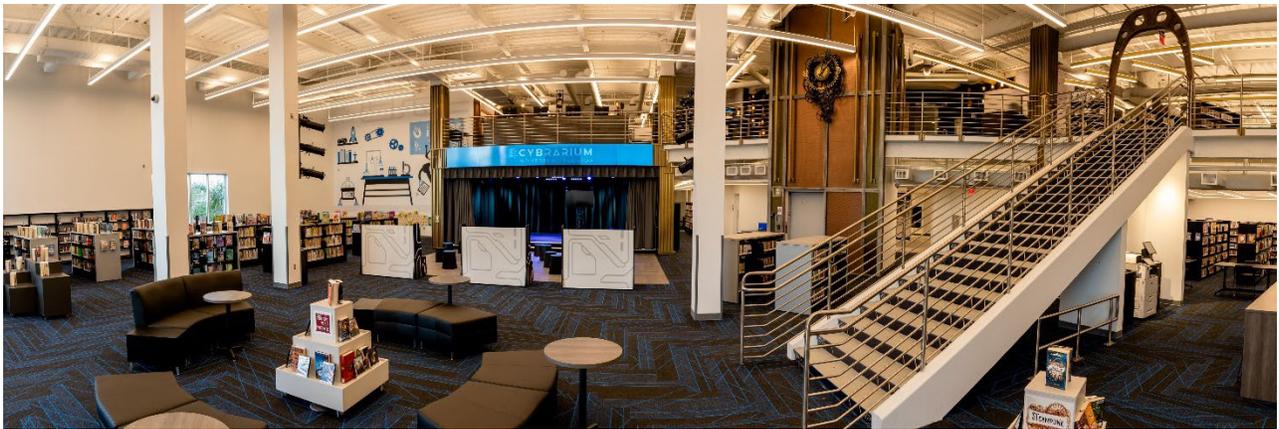




City of Homestead



FY 2020-2021 Consolidated Annual Performance and Evaluation Report (CAPER) Community Development Block Grant (CDBG) Program

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Executive Summary

The City of Homestead has completed the third year of the current five-year Consolidated Plan, which covers fiscal years 2018 through 2022. In addition, the City is working on completing projects from current and prior years, including Miami Bridge, New Hope CORPS, Sunrise Community, Blakey Park, Police Athletic League Gymnasium, and Roby George Park. In 2020, the City dealt with the effects of COVID-19, which slowed implementation of the CDBG program because many nonprofits and businesses operated with reduced staff. The City also received two allocations of CDBG CV funds, which required substantial staff resources to program and implement.

Every year the City of Homestead must submit a report on Community Development Block Grant (CDBG) expenditures and progress, which is the Consolidated Annual Performance and Evaluation Report (CAPER). Because Homestead only receives annual allocations of Community Development Block Grant (CDBG) funds, the CAPER is largely limited to that program. As in previous years, the CAPER follows a prescribed format suggested by the U.S. Department of Housing and Urban Development (HUD) that helps to facilitate the review process and includes specific regulatory language. An additional narrative has been added to the CAPER to provide more comprehensive information about projects and activities from the past program year.

The CAPER is a regulatory report that follows a prescribed format, and although not all of HUD's reporting format requirements necessarily apply to Homestead, they are included for consistency. The City does not receive, and therefore cannot report on, direct allocations of specific HUD programs such as HOME, American Dream Downpayment Initiative (ADDI), Emergency Shelter Grant (ESG), Section 8 Housing Vouchers, or Housing Opportunities for People with AIDS (HOPWA). Miami-Dade County does receive funding through these programs and may offer assistance to Homestead residents and agencies, but this type of assistance is not reported in the CAPER. The City also does not receive State Housing Initiative Partnership (SHIP) funds from the State of Florida. However, the format of the CAPER often requires the City to comment on these programs even though we do not receive them directly.

On occasion, the City may receive additional funding from HUD for specific purposes, such as this year's CARES Act allocations. These programs have provided substantial benefit to the City, and while they are not required to be reported as part of the CAPER, they are essential to Homestead's housing and community development goals. As such, the CAPER incorporates a summary of these additional programs that are currently underway to provide a more comprehensive picture of HUD funding in Homestead. All of the targeted programs use funds for eligible CDBG activities, and therefore complement entitlement activities. One of the additional programs underway in Homestead is the Neighborhood Stabilization Program (NSP). Other programs, the Community Development Block Grant– Recovery (CDBG-R) and the Community Development Block Grant Disaster Recovery Initiative (CDBG-DRI), are closed and have been previously reported to HUD. The City did not receive NSP 3 funding.

CR-05 GOALS AND OUTCOMES

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

The City of Homestead has prepared the FY 2020-2021 CAPER as required by HUD which describes the use of CDBG funds during the third year of the 2018-2022 Consolidated Plan period, covering October 1, 2020, to September 30, 2021.

The information provided in this CAPER gives a review of the activities and accomplishments associated with FY 2020/2021.

STEM Education

Dibia DREAM was selected to deliver educational public services to the students of Homestead. In particular, Dibia DREAM specializes in STEM classes (Science, Technology, Engineering, and Math). Due to COVID 19, Dibia DREAM continued to conduct all classes remotely. Despite the difficult circumstances, Dibia DREAM succeeded in providing STEP education opportunities to 1,116 low-income students.

The primary activity was STEM Saturdays, which transforms community spaces into intergenerational "Incubators of Excellence" by engaging the community ages 8 and up in an array of weekend STEM activities at no cost to participants. STEM Saturday "Incubators" host widely publicized events where all participants - parents, teachers, DREAM STEM professionals - engage in fun and educational activities that explore science, technology, engineering, and mathematics. Additionally, civic engagement is increased as community members from across the socioeconomic spectrum work and learn together. The goal of STEM Saturdays is to engage the entire community in Science, Technology, Engineering, & Mathematics (STEM).

Results:

- Provided over 800 DREAM Boxes to the students. DREAM Box consist of 2 STEM kits, DREAM t-shirt, DREAM face masks, DREAM hand sanitizer, Future Scientist pin and additional STEM tools twice per month
- Parent involvement as volunteers
- Students were engaged by Doctors, Environmental Scientist, Miami Dade Science Teacher of the Year, Biomedical Scientist, Electrical Engineers, and other STEM professionals

Expenditure: \$100,000

Section 108 Payment/ Cybrarium

This activity is for the City's repayment of principal and interest for the Homestead Cybrarium project. Cybrarium

Expenditure: \$260,149

Roby George Park Pool Improvement

This activity was funded in FY 2018-2019 and was completed June 2021. The project repaired the filtration system in the Pool. The original allocation for this project was \$40,000; however, the project required additional funding due to circumstances. The park supports low-moderate income residents and serves as a place for residents to enjoy and safely gather.

- Expenditures: \$44,000

Roscoe Warren Park Improvement

This activity was funded in FY 2018-2019 and was completed June 2021. The project provided benches and tables for the use of residents at Roscoe Warren Park. The park supports low-moderate income residents and serves as a place for residents to enjoy and safely gather.

- Expenditure: \$32,000

New Hope Corps Improvement – Renovation of dining room and kitchen

This activity was funded in FY 2016-2017 and was complete as of June 2021 but due to permitting issue project was delayed. In addition, due to COVID 19 delays, normal review was slower than usual. COVID 19 has had a substantial impact on this facility, with several reported infections. The Homestead Soup Kitchen served 17,704 hot meals in FY 2017.

- Expenditures: \$44,324

CDBG-CV

In response to the COVID-19 pandemic, the City of Homestead received additional allocations for Community Development Block Grant- CARES (CDBG-CV).

Small Business Assistance

This activity was funded in FY 2019-2020 and is currently in progress. Small Business Assistance Program provides direct financial assistance to for-profit businesses. Locally owned establishments impacted by COVID-19 pandemic.

- Results- 24 business assisted
- Expenditures: \$240,000

Utility and Housing Assistance

Providing financial assistance of Rental, Mortgage and Utilities assistance to sustain families impacted by Coronavirus Pandemic in the City. This activity was funded in FY 2019-2020 and is currently in progress. Utility and Housing Assistance program provides payment assistance for COVID-impacted residents in arrears, which will work in conjunction with existing CARES Act

programs in the City and the County. The Program was designed to assist residents who have suffered a financial hardship due to the COVID-19 pandemic.

- Results- 42 assisted
- Expenditures: \$51,821.21

Housing Assistance

This activity was funded in FY 2019-2020 and is currently in progress. Housing Assistance Program provides mortgage and rent payments for COVID-impacted residents in arrears, which will work in conjunction with existing CARES Act programs in the City and the County. The Program was designed to assist residents who have suffered a financial hardship due to the COVID-19 pandemic.

- Results- 42 assisted
- Expenditures: \$207,047.25

Meal Assistance – FY 2019-2020

This activity was funded in FY 2019-2020 and was completed June 2021. Food Assistance Program for City of Homestead residents. The Program was designed to assist residents who have suffered a financial hardship due to the COVID-19 pandemic by alleviating the burden of groceries.

- Results- 1,032 gift cards provided
- Expenditures: \$100,000

Meal Assistance – FY 2020-2021

This activity was funded in FY 2020-2021 and is currently in progress. Food Assistance Program for City of Homestead residents. The Program was designed to assist residents who have suffered a financial hardship due to the COVID-19 pandemic by alleviating the burden of groceries. The program will work in conjunction with an existing program already underway in the second CARES Act tranche.

- Results- 804 gift cards provided
- Expenditures: \$76,789.50

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.

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
Quality of Life for LMI Population- Public Facility	Public Facilities	CDBG	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	Persons Assisted	0	69725		0	69725	
Quality of Life for LMI Population- Public Services	Public Service	CDBG	Public Services Low/Moderate Income benefit	Persons Assisted				1116	1116	

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

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

The City is now in the third year of the current Consolidated Plan. One Public Service was delivered in FY 2020-2021, and another is on track for 2021-2022, in addition to numerous publicfacilities projects that are underway. COVID-19 has also adversely effected the City’s ability to complete all of the current projects underway.

For FY 2020-2021, the City met two goals: providing public services to LMI—Dibia DREAM and completing the Food Assistance Program. Also, the opening of the Cybrarium to the City in the Spring of 2021. In addition, to enhancing the public infrastructure

with restoration to Roby George Park Pool, restrooms, and lockers. Furthermore, the improvement of Roscoe Warren Park by providing benches and tables.

Pending and underway projects include:

- Miami Bridge ADA/Exterior Improvements (Pending)
- New Hope Corps Residential upgrade security and interior (Pending)
- Blakey Park (Under ERR)
- PAL Improvements (Under ERR)
- Sunrise Community Center (Under ERR)
- Roby George Park (Pending)

Due to Covid-19, the departure of our CDBG Consultant at the beginning of 2021, and the loss of our experienced CDBG staff in the Summer of 2021, the City could not meet the goals established in the Annual Action. The City plans to move forward with several projects once a CDBG Consultant is contracted with the City at the beginning of 2022. The City will address all pending or planned projects that will address public facilities, public services, infrastructure, and housing. The City is looking forward to meeting the goals established in the new Consolidated Plan.

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	121
Black or African American	910
Asian	77
American Indian or American Native	8
Native Hawaiian or Other Pacific Islander	0
Total	1116
Hispanic	270
Not Hispanic	846

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

Narrative

Table 2 provides an aggregate of race and ethnicity data for households assisted through the public services program. The accomplishment data from all CDBG activities will be reported in HUD’s Integrated Disbursement and Information System (IDIS).

COVID-19 challenged DREAM with creating STEM Lab videos that promote inter-generational activities among household members. STEM Zoom Classrooms created opportunities for our DREAM STEM professionals to host social experiences utilizing STEM kits curriculums provided by DREAM to engage children within households. Virtual STEM will now be a key component of programming for DREAM and how it exposes the community to STEM. During this unprecedented emergency closure of schools, we are making every effort to ensure our students' educational opportunities continue while at home.

The Instructional Continuity Plan is a large digital convergence that has three components: Content Delivery, Mobile Devices, and Internet Access. School Districts have met the needs of mobile devices and ensuring students have internet access via partner AT&T.

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	\$1,686,067.66	\$632,623.25
CDBG-CV	public – federal	\$1,440,749.71	\$653,525.75
NSP	Public- federal	\$330,963.00	\$15,512.35

Table 3 - Resources Made Available

Narrative

In FY 2020-2021 due to the COVID-19 pandemic and the staff changes there were several activities not started or significantly delayed which resulted in lower expenditures than previous years. The table above details the resources made available during the program year as well as funds expended during the program year.

The federal resources available for the implementation of projects during FY 2020-2021 are identified in Table 3. Total CDBG resources available in FY 2020-2021 was:

- **\$1,686,067.66** (\$823,891 new CDBG allocation)
- \$1,440,749.71 in CDBG-CV (1 and 3)
- \$862,176.66 unexpended CDBG funds from prior years
- The City expended \$1,286,149 in FY 2020-2021 (CDBG and CDBG-CV)

Identify the geographic distribution and location of investments

Target Area	Planned Percentage of Allocation	Actual Percentage of Allocation	Narrative Description
Citywide	100%	100%	Public Service, Public Facilities

Table 4 – Identify the geographic distribution and location of investments

Narrative

The funds are distributed Citywide

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 has significantly leveraged CDBG funds with local resources for the Cybrarium, which was completed in Spring of 2021.

The City does not own any public owned land or property for affordable housing besides the 5 properties purchased using NSP funds

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	12	0
Number of Special-Needs households to be provided affordable housing units	0	0
Total	12	0

Table 5 – Number of Households

	One-Year Goal	Actual
Number of households supported through Rental Assistance	0	0
Number of households supported through The Production of New Units	0	0
Number of households supported through Rehab of Existing Units	12	0

	One-Year Goal	Actual
Number of households supported through Acquisition of Existing Units	0	0
Total	12	0

Table 6 – Number of Households Supported

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

Due to Covid-19, the departure of our CDBG Consultant at the beginning of 2021, and the loss of our experienced CDBG staff in the Summer of 2021, the City could not meet the its housing goals.

Discuss how these outcomes will impact future annual action plans.

Preserving the City’s aging affordable housing stock and connect buyers with affordable housing units continue to be priorities for the City. The anticipates reopening its Purchase Assistance and Home Repair program in FY 2022-2023. The City will continue to pursue additional resources for affordable housing and outreach to speacial needs households.

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

Number of Households Served	CDBG Actual	HOME Actual
Extremely Low-income	0	0
Low-income	1,116	0
Moderate-income	0	0
Total	0	0

Table 7 – Number of Households Served

Narrative Information

CR-25 - Homeless and Other Special Needs 91.220(d, e); 91.320(d, e); 91.520(c)

Evaluate the jurisdiction's progress in meeting its specific objectives for reducing and ending homelessness through:

Reaching out to homeless persons (especially unsheltered persons) and assessing their individual needs

Over the last year, the City of Homestead has collaborated with Homestead Hospital and SOS (a local non-profit focused on domestic violence prevention and emergency housing). This collaboration, called Team Homestead, is a collaborative effort by the City to implement an innovative screening and referral tool to address the social needs of the residents of Homestead and deals with homeless issues. Health Foundation of South Florida has awarded a grant to the City in the amount of \$30,000 to help fund Team Homestead, which is a collaborative effort by the City to implement an innovative screening and referral tool to address the social needs of the residents of Homestead. In total, over \$300,000 has been directed to this effort to track and assist local residents with health issues, including housing.

Addressing the emergency shelter and transitional housing needs of homeless persons

The City does not have an initiative in place to address emergency shelter and transitional housing for homeless but continues to collaborate with Homestead Hospital and SOS.

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

The City of Homestead does not directly administer homeless funds. Several of the projects funded this year do provide some measure of relief for the homeless, such as New Hope CORPS, which provides housing and treatment to men with drug and alcohol dependency. Also, the City continues to provide public service and public facilities funding to the Homestead Soup Kitchen, which provides free hot meals to everyone in need. All provide services to the homeless or those with the potential for homelessness.

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

Homeless services, especially housing, is funded through HUD are coordinated through Miami Dade County, and specifically the Homeless Trust. In particular, the Community Partnership's South Miami-Dade homeless facility located at 28205 SW 125th Avenue provides a complete campus for all homeless services. The City of Homestead actively supports the efforts of the County, the Continuum of Care, and the Community Partnership. The Community Partnership is an efficient and comprehensive agency that amply provides for homeless needs in Homestead.

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

Actions taken to address the needs of public housing

Although not located within the City limits, the Homestead Housing Authority (HHA) operates several public housing facilities in the City of Homestead targeted to farm worker housing. The HHA is based in unincorporated Miami Dade County, several miles north of City limits at 29355 South Dixie Highway. While the HHA operates some facilities within the City, it does not offer housing to any population besides agricultural workers.

In FY 2017-2018, the City funded and completed a housing authority project: \$71,000 for the South Dade Labor Camp. The funds were used to install new energy efficient windows in 34 units benefitting 187 people and the project is complete. The project successfully targeted families with incomes at less than 50 percent of the area median income.

There have been no recent Public Housing Authority projects.

The City does not directly fund any public housing, nor does it manage Section 8 vouchers, HOPWA, ESG, HOME, or SHIP.

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

The City anticipates relaunching its Purchase Assistance program through the CDBG program in FY 2022-2023.

Actions taken to provide assistance to troubled PHAs

Not applicable

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

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

There are several barriers to affordable housing in the City of Homestead. The first is the price of housing, which remains expensive. The second barrier is the low wages generally earned in Homestead. In the wake of the housing crisis of 2007, banks have tightened lending requirements, which creates additional barriers to housing. Although the City does not have a program for homebuyer assistance beyond NSP, it is hoped that the housing rehabilitation program will provide some relief to low income residents.

Although housing in Homestead is expensive, it is considered to be an affordable alternative to areas closer to the urban centers of Miami. As such, the City continues to experience tremendous growth, mostly east of the Turnpike.

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

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

There were no lead hazards identified in FY 2020-2021.

Under the City's programs, lead-based paint (LBP) hazards are evaluated in residential structures built before 1978. In 2013, the City started a residential rehabilitation program, and a number of the homes were built before 1978. Several of these homes have tested positive for lead based paint but all have been addressed.

Management of lead-based paint includes several steps. First, the age and use of the property is determined. If the property was built prior to 1978 and is residential, a qualified firm is selected to perform a lead analysis. If lead is present, the paint is either encapsulated or stripped. The course of action for lead abatement is based on the extent of lead present and the estimated cost of repairs. Generally, minor amounts of lead are encapsulated, and more extensive contamination required paint removal. The City has procured the services of an environmental team that can test housing structures for lead-based paint.

Houses that are tested positive for lead based paint will be rehabilitated in the appropriate manner.

Of all of the houses that applied or were assisted, only two houses in the City's housing rehabilitation program tested positive for lead. In one house, the lead was in paint located on an exterior wall of the garage/utility area. This area was not impacted by the rehabilitation activities, was in good physical condition, and was therefore not remediated.

The other house in question contained lead in the soffits and fascia board. These areas were impacted because the house received a new roof. The roofing contractor followed safe lead practices and removed the boards in question, replacing them with new lumber.

There has never been any other lead detected in housing units in Homestead, which has few historic homes. The majority of housing stock in the City was constructed or rebuilt since 1978, when lead paint was banned from residential use. Hurricane Andrew, in 1992, destroyed or substantially damaged much of the older housing stock. Rapid and dense residential development on the east side of the Florida Turnpike is entirely post-Andrew. All of the new and renovated houses are now compliant with lead paint rules.

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

As in previous years, there are several ways that the City has pursued an anti-poverty strategy. First, the City has undertaken homeownership activities through the NSP that may help alleviate poverty. By providing stable, affordable homeownership and rental properties, certain families living close to the poverty line may receive enough assistance to help lift them out of poverty. As the City navigates the NSP to deliver assistance to residents, the efficacy of the program for this purpose will be evaluated.

In addition, the social service agencies funded by the City through the CDBG program all deal with low or very-low-income families and individuals, including those with disabilities. By working with these agencies to fund improvements to their facilities, the City is helping to alleviate the conditions of poverty. The City continues to fund Start Off Smart (SOS), an agency that helps families in crisis, as well as Miami Bridge, Homestead Soup Kitchen, New Hope CORPS, and Sunrise Center. The City also supported numerous projects at Harris Field, which was occupied by the YMCA. The YMCA provided valuable services to low-income families, such as daycare, wellness programs, swimming lessons, and elderly programs. However, during 2021 the YMCA has relocated out of Homestead's facility.

A new project, the Cybrarium, will replace the existing outdated library with a new, state-of-the-art facility that will bring educational opportunities to the poorest census tract in Homestead. The project was built in an extremely low-income neighborhood and will allow enhanced access to educational facilities for the residents. The Cybrarium is also a key in providing access to LMI residents and bridging the digital divide.

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

The institutional structure of the City's CDBG program is unchanged from the previous year. The City of Homestead manages the CDBG program through the Finance Department and the City Manager's office. The City strives to create linkages across the various departments to assist in the implementation of new CDBG projects. In addition, the City uses consultants

to assist in the administration of the programs. However, due to the departure of our CDBG Consultant at the beginning of 2021 and the loss of our CDBG administrator in the Summer of 2021, the City's institutional structure for the CDBG program was interrupted for the vast majority of 2021. The City is currently reviewing potential CDBG consultants and plans to move forward with a new CDBG Consultant at the beginning of 2022.

All CDBG activities are located within the City of Homestead and serve LMI residents within the service area or are LMI-client based.

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

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

As reported in previous years, the City of Homestead is a partner with HUD in the enforcement of The Fair Housing Act (Section 800, 42 U.S.C. 3601), which states that it is illegal to discriminate in the provision of housing based on race, religion, handicap or familial status. The law applies to housing rentals and purchases, whether publicly or privately owned.

There were no recorded Fair Housing complaints within the City limits of Homestead in FY 2020-2021, or at any time since entitlement funding began in 2008, or at any time prior as far as can be determined. However, the lack of official violations does not necessarily mean that violations have not occurred, and as a recipient of CDBG funding, the City must affirmatively further fair housing. The City takes this responsibility seriously and is a willing partner with HUD. In 2012, HUD reviewed the City's current Analysis of Impediments to Fair Housing and requested a number of revisions. The City complied and resubmitted the Analysis. The following revised impediments were identified in the Analysis:

- Impediment 1: Deficient public education and awareness regarding rights and responsibilities under Federal Fair Housing law, the purpose and mission of the Miami- Dade Office of Human Rights and Fair Employment Practices (OHRFEP), and lack of knowledge about the City of Homestead's Fair Housing Ordinance, including the grievance procedure.
- Impediment 2: Home Mortgage Disclosure Act (HMDA) data indicate a possible racial and ethnic discrepancy of lending practices.
- Impediment 3: Lack of access to affordable housing opportunities.

The City has undertaken several activities to promote awareness of Fair Housing choice.

- A new Language Access Plan was developed and submitted for HUD review and approval.
- Fair Housing was discussed at each meeting in which housing and community development needs were discussed, including two such meetings in April.
- The Fair Housing logo is displayed on all City advertisements related to CDBG.
- Fair Housing is discussed at every CDBG public meeting and educational materials are distributed.

The City does not have staff solely dedicated to the enforcement of Federal Fair Housing laws as can be found in other jurisdictions such as the City of Miami and Miami-Dade County. As such, the City does not investigate allegations of Fair Housing violations in an official capacity. However, should such allegations come to the attention of the City, the matter would be promptly referred to Miami-Dade County or HUD for further investigation and, if appropriate, prosecution. The City would track the complaint to determine whether or not there was cause for further action, and if so, what action was initiated.

HUD has requested that the City update its Fair Housing Analysis, but the City at the time had not yet done so due to conflicting Executive Orders. The latest Executive Order reinstates previous Executive Orders to conduct an Analysis of Impediments to Fair Housing Choice.

The 2020-2021 Action Plan allocated \$25,000 to Fair Housing Impediments Study. The City found that an update on the Analysis of Impediments to Fair Housing is necessary. This study is to review fair housing in the City of Homestead. This study is currently pending and hopes to be completed in the Spring of 2022

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 monitored three subrecipients in FY 2020-2021: New Hope CORPS, Sunrise Community Inc., Dibia DREAM and Miami Bridge. These subrecipients will be monitored throughout the life of their projects. The City monitors subrecipients as required and in accordance with the City's monitoring guidelines. The City does not provide direct funding to any agency or partner to reduce financial liability and ensure program compliance. Construction activities are paid directly to vendors. This relationship assures that funds are provided directly to vendors and eliminates opportunities for problems. In addition, vendors that receive payments from the City, even if on behalf of a non-profit organization, must be registered with the City Purchasing Department. This process assures the City that vendors are legitimate, licensed and insured entities.

Nonetheless, procedures are in place to thoroughly vet applicants prior to receiving funding. When the City received applications for public facilities from non-profit organizations, the City thoroughly reviewed all applications to determine the activities met a national objective, activity eligibility, and beneficiaries. The contract documents between the City and the non-profits will contain very specific language regarding accountability, Federal requirements (labor standards, Section 3, etc.), performance measures and fiscal management.

All project sites and staff are verified in person by City staff. In addition, staff is in frequent contact with subrecipient personnel and contractors. As the projects progress, the City will increase its compliance efforts, which will include executing a contract, reviewing plans and specifications, monitoring construction, and documenting beneficiary data.

All non-profits, especially those engaged with Public Services, are required to complete thorough monthly reports that outline expenditures, reimbursement requests, and accomplishments.

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

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

A public notice was published was issued notifying the public of the availability of the Consolidated Annual Performance and Evaluation Report for public review and comment period. A copy of the public notices is included in Appendix A.

The draft CAPER was available at City Hall located at 100 Civi Court, Hoemstead, FL 33030 and on the City's website www.cityofhomestead.com/189/Community-Development-Block-Grant-CDBG

The City did not receive any comments on the CAPER

In addition to the CAPER, citizens are provided an opportunity to provide input into the City's programs. Meetings are held several times every year to generate discussions related to community development needs, impediments to Fair Housing, the allocation of CDBG resources, the performance of the CDBG program, and other topics.

In 2021, the following public meetings were advertised and held:

- January 25, 2021: Public notification of funding for Small Business Emergency Recovery Grants
- February 26, 2021: Public notification CDBG CV allocation FY 2021
- May 21, 2021: Public meeting for Amendment FY 2014-2015 funding and community development needs
- July 16, 2021: Public notification of funding for FY 2021-2022 and community development needs
- July 21, 2021: Public notification of Council Meeting to consider FY 2021-2022 Action Plan
- July 27, 2021: Public notification FY 2014-2015 CDBG Action Plan Amendment
- July 27, 2021: Public notification FY 2020-2021 CDBG Action Plan Amendment

Copies of all advertisements and public comments are included with the final submission of the Action Plan.

Notification of all meetings is posted on the City's website and advertised in the South Dade NewsLeader. Additionally, for Notice of Funding Availability (NOFA), letters and electronic mailings are sent directly to interested parties in addition to advertisements.

The City of Homestead follows the citizen participation guidelines outlined in the Citizens' Participation Plan as adopted for the most recent Consolidated Plan.

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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 will continue to address the priority needs outlined in the Consolidated Plan through the approved activities in the FY2020. No changes in program objectives were made or are anticipated.

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

No

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

N/A