



U.S. Department of Housing and Urban Development
Buffalo Office
465 Main Street
Buffalo, New York 14203-1780
(716) 551-5755

JAN 27 2016

Mr. Brendan Mehaffy
Executive Director, Mayor's
Office of Strategic Planning
920 City Hall
65 Niagara Square
Buffalo, NY 14202-3309

Dear Mr. Mehaffy:

SUBJECT: 2013 Annual Community Assessment
Community Development Block Grant Program (CDBG), Home Investment
Partnerships Program (HOME), Emergency Solutions Grant Program (ESG), and
Housing Opportunities for Persons with AIDS Program (HOPWA)

Enclosed please find HUD's Annual Community Assessment (ACA) for the City of Buffalo, New York. While continuing efforts are taken into consideration, this assessment was based primarily on the 2013 program year, which covered the period of May 1, 2013 to September 30, 2014.

Please note that a number of regulatory compliance issues were raised in the report, particularly in the areas of CDBG program benefit, the CDBG cap on planning and administration costs, and continuing problems with carrying out ESG program activities in a timely manner. In some instances, the cited issues may, eventually, require reimbursement out of local funds to the City's program line of credit. The CDBG and ESG sections of the report request that the City submit additional information to HUD, as an opportunity to demonstrate compliance with statutory program requirements and thereby avoid reimbursement out of local funds.

We offer you the opportunity to respond within 30 days with any comments or updated information. If no response is received, this report is final and will be considered the City's Program Year Review Letter as required by HUD regulation. Consistent with the Consolidated Plan regulations, the Program Year Review Letter should be made available to the public through your established citizen participation process. HUD will also make it available to citizens upon request.

If you have any questions about this matter, please contact Cheryl Sullivan, Senior CPD Representative, at 716-551-5755, extension 5808.

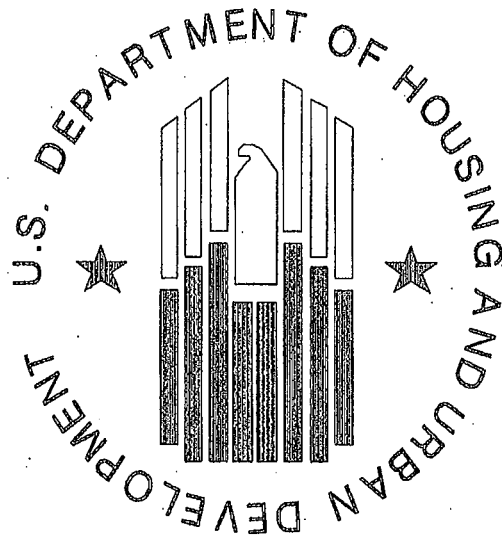
Sincerely,

A handwritten signature in black ink, appearing to read "William T. O'Connell".

William T. O'Connell
Director
Community Planning and
Development Division

Enclosure

**U.S Department of Housing & Urban Development
Buffalo, New York Office**



Annual Community Assessment Report

For

Buffalo, New York

Program Year Period: May 1, 2013-September 30, 2014
Consolidated Plan Period: May 1, 2013-September 30, 2018

Introduction

As a recipient of grant funds provided by the Department of Housing and Urban Development, each jurisdiction that has an approved consolidated plan shall annually review and report to HUD on the progress it has made in carrying out its strategic plan and its action plan. The performance report is submitted to HUD in the form of the Consolidated Annual Performance and Evaluation Report (CAPER).

HUD has the responsibility to review the CAPER report and the performance for each jurisdiction on an annual basis. In conducting performance reviews, HUD will primarily rely on information obtained from the recipient's performance report, records, maintained, findings from monitoring, grantee and subrecipient audits, audits and surveys conducted by the Inspector General and financial data regarding the amount of funds remaining in the line of credit plus program income. HUD may also consider relevant information pertaining to a recipient's performance gained from other sources, including litigation, citizen comments, and other information provided by or concerning the recipient. A recipient's failure to maintain records in the prescribed manner may result in a finding that the recipient has failed to meet the applicable requirement to which the records pertains. Such information, along with grantee input, is considered in HUD's annual assessment in order to make a determination that a grantee has the continuing capacity to administer HUD programs.

In the assessment of your community's performance, this report is prepared to provide feedback on your community's performance in the delivery of HUD's Community Development Programs. This report is presented in three sections. Section I provides a general summary related to your planning and performance reporting; Section II provides a general overview related to specific program progress and performance; and Section III provides additional information regarding compliance with cross-cutting requirements.

Section I – Planning and Reporting

2013 Programs and Funding Amounts:	CDBG	\$13,423,963
	HOME	\$ 2,627,890
	ESG	\$ 971,690
	HOPWA	\$ 524,721

Compliance with Consolidated Plan and 2013 Annual Action Plan

It was determined that the City followed its HUD-approved Consolidated Plan and Annual Action Plan during the 2013 program year, consistent with the City's stated goals, objectives and priority needs for each program funded. These goals, objectives and priority needs are outlined in the Strategic Plan covering the period May 1, 2013 – September 30, 2018, and focus on the following themes:

Housing

- Decent, safe, and affordable housing for low and moderate-income residents, especially renter households, special needs populations, and the homeless.
- Rehabilitation of the City's aging and deteriorating housing stock, including weatherization, energy efficiency improvements, lead-based paint hazard control, and accessibility improvements.
- Construction of new housing, especially rental units.

Community Development

- Demolition of vacant, dilapidated structures.
- Improvements to community centers, parks, and recreation facilities.
- Improvements to streets and sidewalks.
- Improvements to commercial corridors.

Economic Development

- Creating a workforce with skills that match the needs of businesses.
- Improving transportation links between jobs and workers, especially low- and moderate-income residents.
- Retaining/expanding/attracting businesses to create jobs and reduce poverty.

Public Services

- Support human service providers to address the housing and supportive service needs of low- and moderate-income residents, especially special needs populations.

Attached to this report is a table comparing goals established in the 2013-2018 Consolidated Plan with actual accomplishments for program year 2013, as reported by the City in IDIS and in the 2013 CAPER. Note: Due to limitations of the system, and the large variety of accomplishment types, some of the accomplishments listed combine activities that are completed and underway. Adjustments have also been made to account for the use of prior-year funds (i.e., pre-2013) during the 2013 program year, which are not always captured in reports covering program year 2013 activities.

Program progress continues to have been affected by the massive overhaul of the City's grant administration structure that was the result of HUD's requirement that urban renewal agencies be treated as subrecipients, rather than a component of local government. The transition was somewhat lengthy and required a high level of collaboration between City departments and the Buffalo Urban Renewal Agency (BURA), in order to develop new systems as well as policies and procedures to comply with all HUD grant program requirements.

The transition also required the creation of new roles and responsibilities within various City departments:

- The Mayor's Office of Strategic Planning (OSP) has the overall responsibility to coordinate and manage program activities as carried out by multiple agencies and departments.
- OSP continues to work closely with the Buffalo Urban Renewal Agency (BURA) for program implementation and management of CDBG- and HOME-funded activities.
- The City's Department of Administration, Finance, Policy, and Urban Affairs (DAF) is now responsible for all fiscal administration and management of HUD grants.
- The City's Department of Audit and Control is now responsible for requesting, receiving, and disbursing the drawdown of funds from HUD.
- Administration for the ESG and HOPWA grants has been transferred to the Department of Community Services and Recreational Programming. In addition to ESG and HOPWA program activities, the Department of Community Services administers CDBG-funded public services, including services for seniors, youth, and the disabled, as well as services related to literacy, fair housing, anti-predatory lending, substance abuse, and legal services.

Section II – Grant Program Progress and Performance

Community Development Block Grant (CDBG)

Summary of Performance Indicators and Accomplishments

Activities: Program activities for the reporting period were adequately described in the CAPER, and CDBG funds appear to have been spent on activities that were eligible under program rules. The following highlights CDBG activities and accomplishments that were completed during the program year:

Housing: \$2,013,995 was spent during the program year to improve the quality of rental and homeowner housing, through activities that included rehabilitation, energy efficiency improvements, and lead paint abatement. The City addressed 223 housing units with CDBG funds during the reporting period.

Public Services: The City spent \$2.6 million during the program year on a variety of public service activities including senior and youth services, fair housing counseling, employment training, substance abuse, and child care services. A total of 596,753 units of service were provided to City residents through 82 public service programs.

Public Facilities: The City spent \$10.7 million on 62 separate public facilities and improvements projects, such as neighborhood centers and park and recreational facility improvements.

Economic Development: \$1.1 million was spent during the program year for direct assistance to for-profit entities, resulting in the eventual creation of 7 full-time jobs and 48 part-time positions. Another \$2.45 million was utilized for Section 108 loan program repayments.

Clearance and Demolition: \$4.35 million was spent during the program year for the demolition of 331 dilapidated and abandoned housing units.

National Objective Compliance: Based on information reported and described in the CAPER, the City's CDBG funded activities overall appear to be eligible and do meet a CDBG national objective, consistent with the criteria outlined in CDBG regulations.

Program Benefit: CDBG regulations also require that 70 percent of expenditures during a grantee's certification period be for activities meeting the national objective of primarily benefiting low/moderate income persons. As permitted under CDBG regulations, the City has selected a three-year certification period, covering program years 2011, 2012, and 2013. The proportion of CDBG expenditures during the 2013 program year, for activities meeting CDBG criteria for principally benefiting low/moderate income persons, was 77.77 percent. However, cumulative program benefit for the three-year certification period was only 69.9 percent. The difference between the 70 percent benefit level and the actual benefit level was \$40,626. Given that the minimum program benefit requirement is statutory, the City will be required to repay that amount to the City's CDBG program account out of local non-Federal funds, unless additional information is submitted to HUD demonstrating a higher level of program benefit.

HUD is willing to review any additional information submitted by the City to show that actual expenditures for low/moderate-income activities, during the three program years, were higher than those previously reported by the City. For example, a significant amount of CDBG funds has been spent on demolition and clearance activities, which are normally considered to meet the national objective of slum/blight elimination, and not counted towards the overall program benefit calculation. However, to the extent that the City can show that properties cleared during the three-year certification period have been, or will be, redeveloped for a use meeting CDBG criteria for low/moderate income benefit, the CDBG expenditures for the clearance activities, during the 2011-2013 program years (May 1, 2011 through September 30, 2014), can be reclassified as low/moderate income expenditures, and included in the program benefit total.

Planning and Administration: CDBG expenditures during the program year for planning and administration costs are limited to 20 percent of the current year grant, plus 20 percent of the program income received during the current program year. As stated at 24 CFR 570.200(g), compliance with the cap is determined based on the amount of funds obligated during the program year. The calculation includes total planning/administration expenditures during the program year, adjusted by the net increase or decrease in unliquidated obligations as of the end and the beginning of the program year. During the 2013 program year, \$3,072,796 was spent on

planning and administration. This figure is adjusted by subtracting the \$132,788 of unliquidated obligations at the end of the previous year (2012), and adding \$600,227 of unliquidated obligations at the end of the current program year (2013), for a total of \$3,540,235 classified as planning and administration costs. This adjusted figure is 20.64 percent of the 2013 grant amount combined with \$3,726,075 in 2013 program income receipts. The difference between the 20 percent cap amount (\$3,430,008) and the actual expenditures (\$3,540,235) is \$110,227, which must be repaid to the City's CDBG program account out of local non-Federal funds.

Before requiring that the City do so, HUD is willing to review any additional information submitted by the City to show that planning and administration expenditures were lower than the amount reported in IDIS. For example:

- Some of the costs classified as planning and administration may qualify as program delivery costs (see CPD Notice 13-07, dated August 23, 2013, and posted at <https://www.hudexchange.info/resources/documents/Notice-CPD-13-07-Allocating-Staff-Costs-Program-Administration-Delivery-Costs-CDBG.pdf>);
- A portion of the unliquidated obligation amounts at the beginning or end of the program year may not constitute an actual "obligation" of funds, in that there is a balance funded in IDIS that is not the result of an executed contract; and/or
- The amount listed as unliquidated obligations as of the end of the 2013 program year (September 30, 2014) is overstated, because it was not reduced by over \$260,000 in drawdowns made between October 1, 2014 and December 31, 2014 that were flagged as prior year drawdowns (i.e., and counted towards the 2013 program year expenditures).

Public Services: CDBG expenditures during the program year for public services are limited to 15 percent of the current year grant, plus 15 percent of the program income received during the prior (2012) program year. During the reporting period, the City spent \$2,599,656. When this figure is adjusted by subtracting the \$652,622 of unliquidated obligations at the end of the previous program year, and adding the \$91,117 of unliquidated obligations at the end of this reporting year, the total public services costs subject to the cap are \$2,038,151. This amount is 13.84 percent of the grant plus the prior year program income amount, so that the City has complied with the applicable limit on such costs.

Program Progress and Timeliness: The CDBG program requires that, as of 60-days before the end of the program year, the City's unexpended CDBG funds should be no more than 1.5 times the annual grant. As of August 2, 2014 the balance on the CDBG line of credit was 1.44 times the 2013 CDBG amount, so that the City's program is in compliance with this standard for program year 2013. This represents significant progress over the 2012 performance, when the unexpended balance was 2.5 times the 2012 CDBG amount.

Management

During the 2013 program year the City continued the process of fine-tuning policies and procedures that were developed, starting in 2012, as a result of HUD requiring the City treat the Buffalo Urban Renewal Agency (BURA) as a subrecipient, rather than as a component of local government. This represented a major change, given that BURA had functioned as an arm of the

City since the start of the CDBG program in 1976. BURA's change in status triggered changes and expanded roles in program policies and procedures within several City departments, particularly the Department of Audit and Control, the Department of Administration, Finance, Policy & Urban Affairs, and the Department of Community Services. The City has submitted updated policies and procedures that reflect the improvements recommended by HUD and HUD's technical assistance contractors, and HUD will continue to be available to assist the City in solidifying the improvements in program management.

HUD Monitoring Results

During the City's 2013 program year, HUD monitored the City's CDBG program. The monitoring report, issued August 26, 2014, contained two findings that related to CDBG-funded activities. The first one questioned the eligibility of a newly-funded public service, because City files did not contain documentation that the service represented a new or increased level of service, beyond that provided in the preceding 12 months using local or state funds. The finding (Finding 4 in the report) was later cleared once the City submitted material documenting compliance with this requirement. The second CDBG finding (Finding 5) is still open, and relates to the eligibility of charging a portion of the costs of staff in BURA's Citizen Services Division to the CDBG program, as planning and/or general administration costs. A preliminary review of supporting documentation submitted by the City concluded that costs charged to planning and/or general administration during the 2013 program year could be treated as eligible CDBG program costs. However, slightly more than half of the Citizen Services Division staff time charged to CDBG planning and/or general administration during the prior program year was not an eligible CDBG cost. The finding will be closed once the amount of ineligible costs has been finalized, and the reimbursement to the City's CDBG line of credit, out of local, non-Federal funds, has been completed.

Recommendations for Improvement

The City should re-examine planning/administration costs, and national objective classification of activities, as described above, and submit information to HUD that might ameliorate calculations of cap compliance and/or program benefit, within 30 days of the issuance of this report.

To the extent that the City is not able to submit material supporting a reduction in the planning/administration excess costs, and/or the shortfall on program benefit, the City will need to submit a repayment plan within 30 days of the issuance of this report, for reimbursement of the ineligible amounts (\$110,227 and \$40,626, respectively) to the City's CDBG line of credit, with full reimbursement to be completed within 12 months.

HOME Investment Partnerships Program (HOME)

Summary of Performance Indicators and Accomplishments

Based on reported information, HOME-funded activities appear to be eligible and otherwise meet program requirements.

Activities: Program activities were adequately described for the reporting period. HOME funds were spent on activities that, as described, were eligible under program rules. The following highlights activities and accomplishments that were completed during the program year:

Rentals: the HOME Summary of Accomplishments IDIS report (PR23) shows \$665,784 was disbursed during the program year, and 63 HOME rental units were reported as completed and occupied by the end of the program year.

Owner-Occupied Rehabilitation: \$2,500 was disbursed during the program year, and 4 units were reported as complete (with expenditures in the prior program year).

First-Time Homebuyer: No additional HOME funds were disbursed during the program year, but, based on prior year activities, 8 units were reported as complete during the same period.

Beneficiary Compliance: All beneficiaries met the program requirement that household income is at or below 80 percent of area median income (AMI). In addition, all rental units completed during the program year were initially occupied by households with incomes at or below 60 percent AMI, which exceeds the program requirement that 90 percent of units be occupied by tenants with 60 percent AMI.

Commitments/Reservations/Disbursements: The HOME program requires that funds be committed or reserved to a CHDO within two years, and disbursed within five years, based on the date that HUD first awarded the funds to the City. During the 2013 program year, the City continued to meet statutory requirements to commit funds within 24 months of grant agreement issuance, and to reserve at least 15 percent of funds to CHDO's within 24 months. During the program year, the regulatory requirement to disburse HOME funds within five years of grant agreement issuance was met, as has been the case in previous years.

Management

As noted above, under CDBG, during the 2013 program year the City continued the process of fine-tuning policies and procedures that were developed, starting in 2012, as a result of HUD requiring the City treat the Buffalo Urban Renewal Agency (BURA) as a subrecipient, rather than as a component of local government. Because the HOME program has been managed almost entirely by BURA, the transition into a subrecipient role impacted the HOME program as much as it did the CDBG program. Nonetheless, based on information reported to HUD, the City's performance in the 2013 program year was satisfactory and appears to have met applicable program requirements.

HUD Monitoring Results

During the City's 2013 program year, HUD also monitored the City's HOME program. The monitoring report, issued August 26, 2014, contained three findings that related to HOME-funded activities.

Finding 1 questioned the eligibility of investing HOME funds in a project that had been stalled for some time without measurable progress to indicate that the project would result in the creation of additional affordable housing units. The finding was cleared on a provisional basis, contingent on satisfactory project completion by June 30, 2016.

Finding 2 noted that the City had reserved funds to Community Housing Development Organizations (CHDO) in IDIS prior to executing an agreement with the CHDOs. The finding was cleared based on City assurances that, in the future, agreements would be executed prior to CHDO fund reservations in IDIS.

Finding 3 questioned the use of \$394,555 in CHDO proceeds by Bethel Community Development Corporation for projects that do not meet HOME requirements. The finding has been cleared, on a provisional basis, contingent on full reimbursement of the funds to the City's HOME program account by June 30, 2016.

Recommendations for Improvement

The only recommendations at this time relate to follow-through on completion of the corrective actions described above, under HUD Monitoring Results, by June 30, 2016.

Emergency Solutions Grant (ESG)

Summary of Performance Indicators and Accomplishments

As noted in the CAPER narrative, homelessness prevention services were provided to 3,410 persons, transitional housing and/or emergency shelter was provided to 6,058 persons, street outreach was provided to 671 individuals, and 188 households moved to permanent housing through the rapid re-housing program. These accomplishments were achieved through a network of 11 different providers receiving ESG funds from the City, in cooperation with the Homeless Alliance of Western New York, and with other ESG recipients in the metropolitan area, including Erie County.

Commitments and Disbursements:

ESG program regulations require that the City obligate ("commit") 100 percent of the grant award (excluding funds allocated to administration) within 180 days after grant award, and that the City expend 100 percent of the grant within 24 months after grant award. The following summarizes performance in the context of these requirements:

Fiscal Year 2013 Grant: As of the disbursement deadline (July 26, 2015), \$649,534 had been disbursed to the City, representing only 66.85 percent of the \$971,690 grant amount. A total of \$664,337 in commitments have been entered into IDIS (i.e., activities "funded"), equivalent to 68.37 percent of the grant.

Fiscal Year 2012 Grant: As of the disbursement deadline (February 22, 2015), \$1,134,937 had been disbursed to the City, representing 90.13 percent of the \$1,259,191

grant amount. A total of \$1,239,721 in commitments have been entered into IDIS (i.e., activities "funded"), equivalent to 98.45 percent of the grant.

Fiscal Year 2011 Grant: All funds have been committed, and all but \$9,387, allocated to program administration, has been disbursed, out of \$1,102,056 in grant funds. The 24-month disbursement deadline was November 16, 2014.

Management

The City has continued to work in close cooperation with the area Continuum of Care organization (Homeless Alliance of Western New York). The Rapid Rehousing Demonstration Project was successful in shortening the period during which participating households were homeless.

Primary day-to-day administrative responsibilities for the City's ESG program have shifted from BURA to the City's Department of Community Services, with BURA staff working in a more limited role in program administration. As with the other formula entitlement grant programs, the City's ESG program was affected by the reorganization of the City's grant management structure.

Recommendations for Improvement

HUD and the rest of the Federal Government consider homelessness to be an urgent problem, as exemplified by the inclusion of the word "emergency" in the program's name. The program requirements to obligate and expend funds quickly, as well as effectively, reflect this sense of urgency. Significant delays in distributing available funding to agencies serving homeless and imminently-homeless people are inconsistent with the purposes of the program.

Although the City has been able to report significant accomplishments with respect to the activities carried out with ESG funds during the program year, the CAPER ESG narratives do not normally include information related to timely use of ESG funds, and obstacles thereto, so that the City's narrative does not address the issue, nor outline possible solutions. Given that timely distribution of the City's ESG funds has not improved over time, HUD is requesting that the City provide a detailed response to this report, outlining the factors that prevented timely distribution of ESG funds awarded to the City, and describing actions that the City has taken and/or will take to remedy the problem(s).

Housing Opportunities for Persons with AIDS (HOPWA)

Summary of Performance Indicators and Accomplishments

During the program year, HOPWA funds provided housing assistance (rent, and short-term mortgage and utility assistance) to 59 households; tenant-based rental assistance to 36 households; and access to permanent housing to 108 households. Supportive services were provided to 169 households, including 108 receiving housing assistance and 61 receiving supportive services only.

Management

Evaluating grant balances on the U.S. Treasury line of credit, as of the end of the 2013 program year, compared with the most recent (2013) grant, the balance is equivalent to .39 times the grant amount, which is well within the program target of 1.5. Evaluating budget status based on activity balances in each year's program, there are activity balances remaining to be disbursed from the 2009, 2012, and 2013 grant programs:

IDIS Activity ID	Activity Name	Funded Amount	Drawn Amount	Balance
7389	American Red Cross - Supportive Services	\$39,643.06	\$35,809.62	\$3,833.44
7391	American Red Cross - Admin.	\$9,577.14	\$8,550.9	\$1,026.24
FY2009 Grant Amount: \$521,962				\$4,859.68
8422	American Red Cross (PHP)	\$80,055.38	\$72,457.83	\$7,597.55
8423	American Red Cross (STRMU)	\$46,401.73	\$44,303.20	\$2,098.53
FY2012 Grant Amount: \$550,703				\$9,696.08
8680	American Red Cross (STRMU)	\$91,041.00	\$57,861.29	\$33,179.71
8682	American Red Cross - Support	\$40,299.00	\$39,519.49	\$779.51
FY2013 Grant Amount: \$524,721				\$33,959.22

HOPWA recipients are expected to fully expend grant funds within 3 years of grant award. On a cumulative basis, this requirement has been met. However, there are minor balances remaining for one grant (2009) that was awarded more than three years prior to the end of the 2013 program year.

Recommendations for Improvement

The only recommendation is for the City to make a concerted effort to complete prior year activities, particularly open activities remaining from the 2009 HOPWA program.

Section III – Cross-Cutting Areas of Review

Financial

The financial information provided by the City appears to be complete, accurate, and with a sufficient level of detail to document the overall financial condition of the City's Consolidated Plan programs. Interest earned on CDBG revolving loan fund (RLF) balances has been returned to the U.S. Treasury, as required by CDBG regulations. The City is up to date with respect to the submission of annual Single Audits, and there are no open audit findings.

Fair Housing and Equal Opportunity (FHEO)

The review from HUD's Fair Housing and Equal Opportunity Division indicated that performance was satisfactory, with no requests or recommendations for changes in policies and/or procedures.

This report was prepared by: Cheryl Sullivan, Senior CPD Representative
716-551-5755 extension 5808
cheryl.c.sullivan@hud.gov

HUD is providing you the opportunity to review this assessment and comment. Based on the information available at the time of this review, HUD has determined that at this time, the City of Buffalo has the continuing capacity to carry out HUD programs identified in this report.

The City has the opportunity to respond within 30 days concerning the information contained in this report. If you have any questions or would like to discuss the Assessment Report, please contact Cheryl Sullivan, CPD Representative. Ms. Sullivan can be reached at 716-551-5755 extension 5808. If you disagree with this assessment, please respond in writing to William T. O'Connell, Director of Community Planning & Development – HUD, 465 Main Street, Buffalo, New York 14203. Your response should identify any areas of disagreement and corrections or any additional comments you would like HUD to consider.

If no response is received, this report is final and will be considered the City's Program Year Review Letter as required by HUD regulation. Consistent with the Consolidated Plan regulations, the Program Year Review Letter should be made available to the public through the City's established citizen participation process. HUD will also make it available to citizens upon request.

City of Buffalo
Summary of Consolidated Plan Goals and Achievements
Program Year 2013

Goal		Category	Funding Source	Outcome Indicator	Outcome Unit of Measure	Outcome Expected - Strategic Plan	Outcome Expected - Program Year	Outcome Actual - Program Year
Housing Rehabilitation - Emergency repairs	1	Affordable Housing	CDBG	Homeowner Housing Rehabilitated	Household Housing Unit	370	69	223
Housing Rehabilitation - Substantial rehab	2	Affordable Housing	HOME	Rental units rehabilitated	Household Housing Unit	240	54	63
				Homeowner Housing Rehabilitated	Household Housing Unit	20		4
Demolition	4	Non-Housing Community Development	CDBG	Buildings Demolished	Buildings	500	106	331
Public Services	5	Non-Housing Community Development	CDBG	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	0	32,000	596,753
Public Facilities &/or Infrastructure	6	Non-Housing Community Development	CDBG	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	Persons Assisted	0	51,191	173,601
Economic Development Assistance	10	Non-Housing Community Development	CDBG	Facade treatment/business building rehabilitation	Business	50		
				Jobs created/retained	Jobs	142	31	26
				Businesses assisted	Businesses Assisted	50	0	1
				Other	Other	2		
Rapid Re-Housing	12	Homeless	ESG	Tenant-based rental assistance / Rapid Rehousing	Households Assisted	350	60	188
Emergency Shelter	13	Homeless	ESG	Homeless Person Overnight Shelter	Persons Assisted	21,050	4,200	6,058
Street Outreach	14	Homeless	ESG	Homeless person overnight shelter &/or Public services	Persons Assisted	940	180	671
Prevention	15	Homeless	ESG	Homelessness Prevention	Persons Assisted	2,500	500	3,410
Housing Assistance	16	Non-Homeless Special Needs	HOPWA	Tenant-based rental assistance / Rapid Rehousing /HIV/AIDS Housing Operations	Households Assisted	535	107	95
Housing Placement	17	Non-Homeless Special Needs	HOPWA	Public service activities for Low/Moderate Income Housing Benefit	Households Assisted	215	43	108
Supportive Services	18	Non-Homeless Special Needs	HOPWA	Public service activities for Low/Moderate Income Housing Benefit	Households Assisted	400	80	