



**City of Bradenton  
Community Development Block Grant  
Program  
2012-2013 Consolidated Annual  
Performance Evaluation Report  
(CAPER)**



**Wayne H. Poston, Mayor**

**Staff and Administration**

**Timothy Polk, Planning and Community Development Director  
Lesa Livingston, Housing and Community Development Manager  
Vicki White, Housing and Community Development Coordinator**

**November 6, 2013**



**City of Bradenton, Florida  
Planning and Community Development Department  
Housing and Community Development Division**

**Community Development Block Grant Program (CDBG)**

**2012-2013 Consolidated Annual Performance Evaluation Report  
(CAPER)**

**Mayor**

**Honorable Wayne H. Poston**

**Ward 1**

**Councilman, Vice Mayor Gene Gallo**

**Ward 2**

**Councilman Gene Brown**

**Ward 3**

**Councilman Patrick Roff**

**Ward 4**

**Councilman Bemis Smith**

**Ward 5**

**Councilman Harold Byrd**

**Staff and Administration**

**Timothy Polk, Planning & Community Development Director  
Lesa Livingston, Housing & Community Development Manager  
Vicki White, Planning & Community Development Coordinator**

## MEMORANDUM

TO: Mayor, City Council, and Department Heads  
Timothy Polk, Director of Planning & Community Development  
Press

CC: Vicki White, Coordinator of Housing & Community Development

FROM: Lesa Livingston, Manager of Housing & Community Development

DATE: November 6, 2013

RE: October 1, 2012-September 30, 2013 CDBG Consolidated Annual Performance  
Evaluation Report (CAPER)

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The Consolidated Annual Performance Evaluation Report (CAPER) reports the progress made in implementing the Community Development Block Grant (CDBG) Consolidated Plan through the proposed actions identified in the one-year Action Plan. This report also discusses the accomplishments of the goals and objectives identified in the one-year Action Plan, presents information on expenditures, caps, and program income.

Attached for the Mayor and City Council's consideration and approval is the October 1, 2012 through September 30, 2013 CAPER resolution. A copy of the report, the resolution, and any citizen comments on the report will be mailed to the Department of Housing and Urban Development (HUD) Jacksonville Office by November 25, 2013.

**Recommendations:** Requesting a motion to approve and adopt the October 1, 2012-September 30, 2013 Consolidated Annual Performance Evaluation Report for the Community Development Block Grant Program.

**RESOLUTION NO. 13-50**

**A RESOLUTION ON THE CITY COUNCIL OF THE CITY OF BRADENTON, FLORIDA ADOPTING THE CITY OF BRADENTON'S COMMUNITY DEVELOPMENT OCTOBER 1, 2012 – SEPTEMBER 30, 2013 CONSOLIDATED ANNUAL PERFORMANCE EVALUATION REPORT (CAPER).**

**WHEREAS**, the City of Bradenton is a Local Community Development Block Grant Program; and

**WHEREAS**, the City of Bradenton has completed the Consolidated Annual Performance Evaluation Report for the purposes of carrying out the Community Development Block Grant program; and

**NOW THEREFORE, BE IT RESOLVED BY THE CITY COUNCIL OF THE CITY OF BRADENTON, FLORIDA, THAT:**

1. The City of Bradenton hereby adopts the Consolidated Annual Performance Evaluation Report for its Community Development Block Program.
2. The Consolidated Annual Performance Evaluation Report is attached to this Resolution and all of its terms and conditions are incorporated herein as though fully set forth herein.
3. This Resolution shall take effect immediately.

PASSED AND DULY ADOPTED this 13<sup>th</sup> day of November 2013.

ATTEST:

\_\_\_\_\_  
City Clerk and Treasurer  
Carl Callahan

\_\_\_\_\_  
President, City Council  
Mayor Wayne Poston

APPROVED AS TO FORM:

\_\_\_\_\_  
City Attorney  
William Lisch

**BRADENTON HERALD**

# CLASSIFIED ADVERTISING

Order:	052153387	Pubs:	1,9	Rate:	LE
Phone:	9419329466	Class:	4995	Charges:	\$ 0.00
Account:	4080	Start Date:	11/06/2013	List Price:	\$ 91.26
Name:	CITY,	Stop Date:	11/06/2013	Payments:	\$ 0.00
Firm:	CITY BRADENTON	Insertions:	2	Balance:	\$ 91.26



**NOTICE OF PUBLIC HEARING AND AVAILABILITY OF COMMUNITY DEVELOPMENT BLOCK GRANT (CDBG) PROGRAM CONSOLIDATED ANNUAL PERFORMANCE EVALUATION REPORT (CAPER)**

Notice is hereby given that the City of Bradenton prepared its Consolidated Annual Performance Evaluation Report (CAPER) for the Community Development Block Grant (CDBG) Program year of October 1, 2012 through September 30, 2013.

Copies of the CAPER will be available at the following location during regular business hours commencing November 6, 2013 and will be available for review and comments until November 21, 2013:

- Bradenton City Hall  
101 12th St. W.  
Bradenton, FL 34205

The CAPER will also be available on the City of Bradenton's website at [www.cityofbradenton.com](http://www.cityofbradenton.com). The CAPER will be adopted by the Mayor and City Council members on November 13, 2013 during their regular meeting at 8:30 am in the City Council Chambers located at Bradenton City Hall, 101 12th St. Bradenton, FL 34205. The CAPER will be submitted to the U.S. Department of Housing and Urban Development (HUD) by November 25, 2013. Any public comments received will be included with the CAPER and submitted to HUD.

Wayne H. Poston, Mayor  
Timothy Polk, Director of Planning and Community Development  
City of Bradenton, FL  
**11/6/2013**



## CR05- Goals and Outcomes

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

The city continues to make progress on meeting its high priority need of preserving affordable housing through its housing rehabilitation program. Housing rehabilitation has historically been funded primarily through the State Housing Initiatives Partnership program (SHIP), with some additional funding through the CDBG program. However, the Florida Legislature has swept funds from the state Housing Trust Fund in to the state General Revenue fund. For the program year 2011-2012, the city received \$71,358 in SHIP funds, and for 2012-13, the city received \$19,608 in SHIP funds. Therefore, the city has allocated a larger share of its CDBG funds to affordable housing activities in order to make up for the shortfall in state funds.

The city receives two Shelter Plus Care grants in order to provide tenant-based rental assistance (TBRA) for 21 chronically homeless individuals and 1 chronically homeless family. The city collaborates with Manatee Glens, which provides outreach and supportive services to program participants. Many of these individuals have been on the program for three years or more, and several of them are disabled, so the rental subsidy enables them to stay in affordable housing that is decent, safe, and sanitary. The city expects to continue with this program for the next year.

The city's code enforcement project also helps to preserve affordable housing and suitable living conditions by responding to reports of possible code violations, conducting proactive activities such as meeting with community members to educate them on what sort of activities necessitate a permit and the importance of hiring a licensed contractor for certain types of work. Code enforcement officers have also tracked foreclosed properties in the city to ensure that they are maintained, so that they do not become a neighborhood eyesore or hazard. While code enforcement is a medium priority need, it can help meet the high priority need of preserving affordable housing.

**Note:** Table 2-Accomplishments-Strategic Plan to date does not take into account data from the 2011-12 program year. Therefore, Table 1C was attached in order to present a more accurate picture of the city's accomplishments related to the strategic (consolidated) plan.

**Table 1C: Summary of Specific Objectives**  
**Grantee Name: City of Bradenton**

Availability/Accessibility of Decent Housing (DH-1)						
Specific Objective	Source of Funds	Year	Performance Indicators	Expected Number	Actual Number	Percent Completed

D H1 .1	Rental Assistance	Shelter Plus Care	2011	Persons assisted	23	23	100%
			2012		23	23	100%
			2013				%
			2014				%
			<b>MULTI-YEAR GOAL</b>				
<b>Affordability of Decent Housing (DH-2)</b>							
D H2 .1	Owner-occupied re- habilitation (including special needs rehabil- itation)	CDBG	2011	Housing units assisted	4	5	125%
			2012		4	5	125%
			2013				%
			2014				%
			<b>MULTI-YEAR GOAL</b>				
<b>Sustainability of Decent Housing (DH-3)</b>							
D H3 .1			2011				%
			2012				%
			2013				%
			2014				%
			<b>MULTI-YEAR GOAL</b>				
<b>Availability/Accessibility of Suitable Living Environment (SL-1)</b>							
SL 1.1	Flooring improve- ments-One Stop Cen- ter	CDBG	2011	Square feet of flooring replaced	17,000	17,000	100%
			2012				%
			2013				%
			2014				%
			<b>MULTI-YEAR GOAL</b>				
<b>Affordability of Suitable Living Environment (SL-2)</b>							
SL 2.1			2011				%
			2012				%
			2013				%
			2014				%
			<b>MULTI-YEAR GOAL</b>				
<b>Sustainability of Suitable Living Environment (SL-3)</b>							
SL 3.1	Code Enforcement	CDBG	2011	Initial Inspections	1,200	2,159	180%
			2012		1,200	1,364	114%
			2013				%
			2014				%
			<b>MULTI-YEAR GOAL</b>				

Availability/Accessibility of Decent Housing							
Specific Objective		Source of Funds	Year	Performance Indicators	Expected Number	Actual Number	Percent Completed
DH1.2	Rental Rehabilitation	NSP	2011	Housing units assisted	1	1	100%
			2012				%
			2013				%
			2014				%
			<b>MULTI-YEAR GOAL</b>				1
Availability/Accessibility of Decent Housing							
DH1.3	Rehabilitation for Ownership	NSP	2011	Housing units assisted	6	6	100%
			2012				%
			2013				%
			2014				%
			<b>MULTI-YEAR GOAL</b>				6
Affordability of Decent Housing (DH-2)							
DH2.3	New Construction	NSP	2011	Housing units constructed	6	6	100%
			2012				%
			2013				%
			2014				%
			<b>MULTI-YEAR GOAL</b>				6
Affordability of Decent Housing (DH-2)							
DH2.4	Replacement Housing	CDBG	2011	Housing units constructed	1	0	0%
			2012				0%
			2013				%
			2014				%
			<b>MULTI-YEAR GOAL</b>				1
Other (O-1)							
O1.1			2011				%
			2012				%
			2013				%
			2014				%
			<b>MULTI-YEAR GOAL</b>				
Other (O-2)							
O2.1			2011				%
			2012				%
			2013				%
			2014				%
			<b>MULTI-YEAR GOAL</b>				

**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.**

As previously stated, the city's use of funds for housing rehabilitation meets a high priority need of preserving affordable housing. Through the down payment/closing cost assistance program, it was hoped that the city could meet the need of affordable housing accessibility. However, response to this project was less than expected. One participant ended up purchasing a house in the county, so they were unable to use the city's down payment assistance. Another participant was still out looking as of the end of the program year.

The city's Shelter Plus Care programs continue to be successful, providing tenant-based rental assistance to 21 chronically homeless individuals and 1 chronically homeless family. Many of the participants have been on the program for three years or more. The city's partner in this program, Manatee Glens has been able to quickly locate new candidates as other participants exit the program for various reasons. The Shelter Plus Care grants also meet the high priority need of access to affordable housing.

While code enforcement is a medium priority need, it has contributed to the high priority need of preservation of affordable housing. The two code enforcement officers funded through this project work in some of the oldest neighborhoods in the city. Their efforts also help to arrest blight and decay in these neighborhoods, resulting in a more suitable living environment for the residents of these neighborhoods.

**CR-10 - Racial and Ethnic composition of families assisted - 91.520(a)**

**Describe the families assisted (including the racial and ethnic status of families assisted 91.520(a))**

	<b>CDBG</b>
<b>Race</b>	
White	22
Black or African American	3
Asian	
American Indian or American Native	
Native Hawaiian or Other Pacific Islander	
<b>Total</b>	
<b>Ethnicity</b>	
Hispanic	4
Not Hispanic	2

The racial and ethnic information regarding the families assisted is for families assisted through the housing rehabilitation and Shelter Plus Care programs only. Data for the code enforcement project is based on the number of housing units that code enforcement officers see in initial inspections.

**CR-15 - Resources and Investments 91.520(a)**

Identify the resources made available.

Source of Funds	Source (Federal, state local)	Expected Amount Available (system generated)	Actual Amount Expended Program Year 2012
CDBG	public - federal	\$395,915.00	\$278,062.12

Additional resources include:

SHIP (state): \$19,608.00 plus \$16,120.00 in program income

Shelter Plus Care (federal): \$168,396

Identify the geographic distribution and location of investments.

Target Area	Planned Percentage of Allocation (system generated)	Actual Percentage of Allocation	Narrative Description
CENSUS TRACT WITH LOW INCOME 51%	70	86	Code enforcement, Housing

The bulk of the city's activities were located in low and moderate-income census tracts. One exception was a home owned by a moderate-income family that was not located in a low-moderate income census tract that was rehabilitated using CDBG 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.

	<b>One-Year Goal</b>	<b>Actual</b>
<b>Number of homeless to be provided affordable housing units</b>	23	23
<b>Number of non-homeless to be provided affordable housing units</b>	7	5
<b>Number of special-needs to be provided affordable housing units</b>	2	2
<b>Total</b>	31	30

<b>Number of households supported through:</b>	<b>One-Year Goal</b>	<b>Actual</b>
<b>Rental Assistance</b>	22	22
<b>The Production of New Units</b>	0	0
<b>Rehab of Existing Units</b>	4	5
<b>Acquisition of Existing Units</b>	5	0
<b>Total</b>	31	28

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

The city was able to meet its goals with the exception of the acquisition of existing units. This activity was to be accomplished using Neighborhood Stabilization Program funds received from the state. However, the city opted to return approximately \$750,000 in NSP funds and program income to the state rather than acquiring and rehabilitating additional units for rental to families at or below 50% of the area median income (AMI).

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

Affordable housing that is decent, safe, and sanitary continues to be a high priority for the city, so this need will continue to be mentioned in future annual action plans, at least in the near future. The preservation of affordable housing can include making the necessary modifications so that people who are disabled are able to enjoy and maximize the use of their home, so accessibility modifications will be included in future plans.

**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 Persons Served</b>	<b>CDBG Actual</b>
<b>Extremely Low-income</b>	0
<b>Low-income</b>	1
<b>Moderate-income</b>	2
<b>Total</b>	3

**Narrative**

The persons served mentioned above were assisted with CDBG funds through the city's housing rehabilitation program. There were two additional families served through this program using SHIP funds, which also have eligibility requirements as well as set-asides regarding income. One family fell in the low-income category, while the other fell in the moderate-income family.

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

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

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

The city collaborates with Manatee Glens to meet the needs of the chronically homeless with co-occurring severe mental illness and/or substance abuse issues. Manatee Glens provides the outreach and services that program participants need to maintain their housing, while the city provides tenant-based rental assistance through the Shelter Plus Care program. Occasionally program staff will receive calls from people who are homeless or at risk of homelessness. These callers will be referred to a variety of community organizations that provide assistance to people who are homeless or at risk of homelessness.

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

The city addressed the emergency shelter and transitional housing needs of homeless persons by participating in the Manatee-Sarasota Continuum of Care, and will continue to participate in the Continuum in the coming year.

**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.**

Program staff provides information and referrals to individuals and families in the above-mentioned situations and attends Continuum of Care meetings regularly in order to gather information of what services are available for individuals and families in these situations.

**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 helps chronically homeless individuals and families make the transition to permanent housing through its Shelter Plus Care program in partnership with Manatee Glens. The tenant-based rental subsidy helps to make affordable housing attainable for chronically homeless individuals and families, who have come from situations such as those mentioned above. Receiving services as needed from Manatee Glens helps them to maintain their affordable housing and avoid becoming homeless again.

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

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

City of Bradenton local government does not own or manage any Public Housing units. The Bradenton Housing Authority (BHA) operates the only traditional public housing in the city limits.

The BHA has taken actions to address the needs of public housing by its mission and goals:

- △ Expanding the supply of assisted housing with an additional 100 housing choice vouchers, reducing the public housing vacancies by 235, leveraged private and public funds to create additional housing opportunities with tax credits and private investment through Hope VI grants and built Bradenton Village (160 units in Phase I).
- △ Improving the quality of assisted housing by improving the public housing management PHA'S score to 92 – High Performer status, increased customer satisfaction solidified by a survey done by New College, improving management

functions with automated systems and PHA'S results, completing the modernization of all public housing units including exterior stucco and air conditioning, demolished 3 older communities through Hope VI, and proving replacement public housing with Bradenton Village.

- ^ Improving the quality of assisted housing by improving the public housing management PHA'S score to 92 – High Performer status, increased customer satisfaction solidified by a survey done by New College, improving management functions with automated systems and PHA'S results, completing the modernization of all public housing units including exterior stucco and air conditioning, demolished 3 older communities through Hope VI, and proving replacement public housing with Bradenton Village.

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

The BHA has taken actions to encourage homeownership by public housing residents by its mission and goals:

- ^ Increasing assisted housing choices by thoroughly explaining voucher mobility to all section 8 applicants at voucher meetings, implementing public housing site-based waiting lists and we are continuing to evaluate the homeownership programs.
- ^ Promoting self-sufficiency by increasing the number and percentage of employed residents using the working preference and exceeding all CSS goals for Hope VI.
- ^ Ensuring equal opportunity in housing for all Americans by undertaking measures to comply with the City Fair Housing Plan, and providing a suitable living environment through the department.

**Actions taken to provide assistance to troubled PHA's.**

No PHA's in the City of Bradenton or Manatee County are troubled.

**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.**

The City under its FY 2012 CDBG Program Year took the following actions to address obstacles to meeting the underserved needs:

- ^ Continued to provide funds to owner occupied for housing rehabilitation

- ^ Continued to work on the foreclosed and abandoned housing issues to help strength neighborhoods vitality
- ^ Continued to work on the removal of architectural barrier on the City's older housing stock through rehabilitation
- ^ Continued to fund the rehabilitation program to help the existing housing stock up to building code standards.

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

The City will continue to leverage its financial resources and aim to apply for additional public and private funds.

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

Manatee Community Action Agency (MCAA) is located in the city limits of Bradenton making a difference in the city in spite of disheartening statistics and unacceptable political games. According to the US Census Bureau, in the Bradenton persons below poverty level, percent, 2007-2011 is 15.6% where more than 46 million people, or about 15 percent of the US population, live below the official poverty level. The "working poor" account for nearly one quarter or 10.4 million of this number. MCAA lives this statistic every day. Thirteen thousand people were served by this agency in 2012. Of those receiving services, fifty one percent were children. Although sixty-one percent were living at or below the federal poverty level. The lack of jobs in the community and families having exhausted unemployment benefits increased the number of families eligible for MCAA services. CSBG funds were used to provide staff support to plan and manage crisis assistance programs as well as long-term family economic self-sufficiency programs. Timothy Polk, Director is the Board Chair of this agency and is looking for additional discretionary funds to leverage with its Community Development Block Grant Program funds to expand economic opportunities within the city.

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

MCAA developed and implemented a new public service awareness campaign focused on the positive outcomes of individuals receiving services from the organization. Monthly MCAA "Success Stories" demonstrate the outcomes achieved through investment of local, state, and federal resources.

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

The City will continue to work closely with non-profit housing development organizations to address the issue of affordable housing. Special outreach activities in the next year will target the business community, faith-based organizations, and minority and immigrant populations. Actions that may be taken include, but are not limited to:

- ^ Continuing to be involved in regional development issues through the City and other regional planning efforts. Regional development and planning gives City of Bradenton the opportunity to push for issues of equity, inclusion, and access for low-income people to opportunities throughout the region
- ^ Participating in the Housing Advisory Committee and with local housing providers to explore additional affordable housing strategies that could benefit the City.
- ^ Continuing to meet with public service agencies to determine how partnerships can be established to coordinate and link services
- ^ Meeting with private sector housing professionals to explore forming partnerships for providing additional affordable housing
- ^ The Director continues to meet with private and public sector economic development professionals to explore forming partnerships and continuing to work with private firms and the Business Development Partnership on increasing the number and percentage of residents working on infrastructure projects

The City continues to collaborate with Suncoast Community Capital (SCC) whose mission is to empower people to achieve economic independence and transform their lives through entrepreneurship and financial asset building.

The City's CCRA facilitated the development of SCC, and supports SCC in the provision of these services to residents and businesses within the Central CCRA, because our residents have identified business development, business attraction, and the revitalization of Martin Luther King Avenue as a "community main street" as important goals for the district.

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

**Affirmatively Furthering Fair Housing**

Bradenton's Analysis of Impediments to Fair Housing (AI), which was adopted by the Manatee County Government Board of Manatee and City of Bradenton's Mayor and City Council, analyzed variables that influence and can act as barriers to housing choice. Barriers identified include availability of affordable housing; zoning and land use; access to housing by special needs populations and families with children; and marketing and advertising.

The Analysis of Impediments to Fair Housing Choice (AI) provides an overview of the laws, regulations, conditions, or other possible obstacles that may affect access to housing as well as recommendations for the City to improve fair housing practices in the City. Overall findings in the AI demonstrated that the City does not have any major fair housing issues.

The AI states that, “The City permits a wide range of conventional single- and multi-family housing. The City’s policies have also been successful in facilitating and encouraging a broad range of special needs housing for homeless people, residential care facilities, alcohol and drug rehabilitation homes, senior housing, and assisted living.” Furthermore, it notes that, “The City clearly has a demonstrated history of facilitating and encouraging the development of emergency shelters, transitional housing, and permanent supportive housing.” The AI did raise the issue of a need to improve inter-jurisdictional coordination with non-profit organizations that provide fair housing assistance.

Despite the lack of overall housing development in a depressed housing market, during the 2011 Calendar Year, only one affordable housing development was approved. No affordable inclusionary units were produced in the last year. Additions of affordable rental housing stock as well as construction of market rate rental units help encourage fair housing practices by striving to meet the community’s need for rental housing. The City will continue to looking for ways to increase affordable fair housing.

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

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

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

The City is committed to ensuring long-term compliance with HUD regulations pertaining to the administration of CDBG funds. All Community Development Block Grant (CDBG) recipients will sign binding contracts that enumerate program requirements. The Housing Division will monitor its grant recipients for compliance with specific program requirements, including applicable federal requirements, such as handicapped accessibility, fair housing, lead-based paint, and Davis-Bacon.

In addition, the Housing Division will monitor in the areas of general management, performance goals, financial management, data collection and reporting, eligibility determinations, nondiscrimination, program outreach, timely reporting, coordination with other programs, and inspection of completed units.

Monitoring will consist of both desk and on-site reviews. On-site reviews will consist of periodic site visits, which will include an in-depth review of agency, project and client files. Desk monitoring of invoice submittals includes a review of contractual commitments, financial documentation, determination of cost eligibility, drawdown rates, and outcome/performance measurement review.

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

Per the city's Citizen Participation Plan, which was amended in 2009, the city makes the CAPER available for 15 days for citizen review and comment prior to submitting it to HUD. Notification that the report is available for review and comment is published in the

local newspaper and on the city's website at the beginning of the 15-day period. The city's Public Information Officer will also prepare a press release regarding the report's availability for review and comment to send to his media contacts. Since the report is approved and adopted by the Mayor and City Council prior to its submission to HUD, the published notice includes the date, time, and location for when the report will be approved and adopted. A summary of any comments received are included with the plan when it is submitted to HUD.

### **CR-45-CDBG 91.520(c)**

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

The City of Bradenton's CDBG program objectives have not changed since the Consolidated Plan developed in 2011 through 2014. Homeless needs, affordable housing, and youth services continue to be high priority needs for the city. However, since youth services activities usually fall under public services and are subject to a 15% spending cap. One recent exception would be funding public facilities that provide youth services. The city funded two such facilities in recent years Just For Girls' facility expansion and the construction of the New 13th Avenue Dream Center. By funding these projects, the city is able to meet the needs of youth in the community as well as provide facilities that the rest of the community may enjoy. Both of these facilities are located in a low-moderate income census tract.

Funding from the State Housing Initiatives Partnership (SHIP) has declined in recent years as the Florida has swept funds from the Housing Trust Fund into the state's general revenue fund. As a result, the city has had less money available for affordable housing activities. Therefore, the city is using more of its CDBG funds for housing rehabilitation, and this year it included down-payment/closing cost assistance as one of its projects. In addition, the city requires that down-payment/closing cost assistance recipients repay all or a portion of the funds they receive. Housing rehabilitation assistance recipients are also required to repay all or a portion of the funds they receive, provided they are able to do so. Repayment is not mandatory for this strategy because many of the households the city serves through this strategy are elderly, disabled, or handicapped, with very low income. This repayment strategy helps bring funds back to the program, so that they may be "recycled" to help additional households. The city will continue with this strategy.

One drawback to using CDBG funds for housing rehabilitation is that staffing constraints limit the types of homes that may be assisted. The city will assist homes built within the last 45 years, since older homes will require a historical study to be completed prior to starting any rehabilitation work. Consequently, the city is unable to reach homes in the oldest parts of the city, some of which are dilapidated. On the positive side, the city is able to help newer homes that are just beginning to show signs of wear, such as those needing a new roof or electrical or plumbing work. As a result, the city has been able to prevent these homes from becoming blighted.

Another aspect of this project is an attempt to meet the needs of the special needs population by making accessibility features part of the process. Going forward, the city will emphasize the fact that the program will cover the installation accessibility features even if the house does not need any repair work completed. The city currently installs accessibility features as needed on homes going through the rehabilitation program, so this will be the first time it has made installing accessibility features alone part of the activity.

**Does this jurisdiction have any open Brownfields Economic Development Initiative (BEDI) grants? -No.**

**Attachment A-IDIS Reports**  
**CDBG Summary of Accomplishments**  
**CDBG Financial Summary**



BRADENTON

Count of CDBG Activities with Disbursements by Activity Group & Matrix Code

Activity Group	Activity Category	Underway Count	Underway Activities Disbursed	Completed Count	Completed Activities Disbursed	Program Year Count	Total Activities Disbursed
Housing	Rehab; Single-Unit Residential (14A)	4	\$26,091.52	3	\$74,287.39	7	\$100,378.91
	Rehabilitation Administration (14H)	1	\$0.00	1	\$1,801.70	2	\$1,801.70
	Code Enforcement (15)	0	\$0.00	1	\$96,721.51	1	\$96,721.51
	<b>Total Housing</b>	<b>5</b>	<b>\$26,091.52</b>	<b>5</b>	<b>\$172,810.60</b>	<b>10</b>	<b>\$198,902.12</b>
Public Facilities and Improvements	Public Facilities and Improvement (General) (03)	1	\$0.00	0	\$0.00	1	\$0.00
	<b>Total Public Facilities and Improvements</b>	<b>1</b>	<b>\$0.00</b>	<b>0</b>	<b>\$0.00</b>	<b>1</b>	<b>\$0.00</b>
Public Services	Homeownership Assistance (not direct) (05R)	1	\$0.00	0	\$0.00	1	\$0.00
	<b>Total Public Services</b>	<b>1</b>	<b>\$0.00</b>	<b>0</b>	<b>\$0.00</b>	<b>1</b>	<b>\$0.00</b>
General Administration and Planning	General Program Administration (21A)	0	\$0.00	1	\$79,163.00	1	\$79,163.00
	Indirect Costs (21B)	1	\$0.00	1	\$0.00	2	\$0.00
	<b>Total General Administration and Planning</b>	<b>1</b>	<b>\$0.00</b>	<b>2</b>	<b>\$79,163.00</b>	<b>3</b>	<b>\$79,163.00</b>
<b>Grand Total</b>		<b>8</b>	<b>\$26,091.52</b>	<b>7</b>	<b>\$251,973.60</b>	<b>15</b>	<b>\$278,065.12</b>



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CDBG Sum of Actual Accomplishments by Activity Group and Accomplishment Type

Activity Group	Matrix Code	Accomplishment Type	Open Count	Completed Count	Program Year Totals
Housing	Rehab; Single-Unit Residential (14A)	Housing Units	0	3	3
	Rehabilitation Administration (14H)	Housing Units	0	0	0
	Code Enforcement (15)	Housing Units	0	27,443	27,443
	<b>Total Housing</b>		<b>0</b>	<b>27,446</b>	<b>27,446</b>
Public Services	Homeownership Assistance (not direct) (05R)	Households	0	0	0
	<b>Total Public Services</b>		<b>0</b>	<b>0</b>	<b>0</b>
<b>Grand Total</b>			<b>0</b>	<b>27,446</b>	<b>27,446</b>



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CDBG Beneficiaries by Racial / Ethnic Category

Housing-Non Housing	Race	Total Hispanic	
		Total Persons	Total Households
Housing	Black/African American	0	0
	<b>Total Housing</b>	<b>0</b>	<b>3</b>
Grand Total	Black/African American	0	3
	<b>Total Grand Total</b>	<b>0</b>	<b>0</b>



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CDBG Beneficiaries by Income Category

	Income Levels	Owner Occupied	Renter Occupied	Persons
Housing	Extremely Low (<=30%)	0	0	0
	Low (>30% and <=50%)	1	0	0
	Mod (>50% and <=80%)	1	0	0
	Total Low-Mod	2	0	0
	Non Low-Mod (>80%)	0	0	0
	Total Beneficiaries	2	0	0



**PART I: SUMMARY OF CDBG RESOURCES**

01 UNEXPENDED CDBG FUNDS AT END OF PREVIOUS PROGRAM YEAR	0.00
02 ENTITLEMENT GRANT	395,815.00
03 SURPLUS URBAN RENEWAL	0.00
04 SECTION 108 GUARANTEED LOAN FUNDS	0.00
05 CURRENT YEAR PROGRAM INCOME	0.00
05a CURRENT YEAR SECTION 108 PROGRAM INCOME (FOR SI TYPE)	0.00
06 RETURNS	0.00
07 ADJUSTMENT TO COMPUTE TOTAL AVAILABLE	0.00
08 TOTAL AVAILABLE (SUM, LINES 01-07)	395,815.00

**PART II: SUMMARY OF CDBG EXPENDITURES**

09 DISBURSEMENTS OTHER THAN SECTION 108 REPAYMENTS AND PLANNING/ADMINISTRATION	198,902.12
10 ADJUSTMENT TO COMPUTE TOTAL AMOUNT SUBJECT TO LOW/MOD BENEFIT	0.00
11 AMOUNT SUBJECT TO LOW/MOD BENEFIT (LINE 09 + LINE 10)	198,902.12
12 DISBURSED IN IDIS FOR PLANNING/ADMINISTRATION	79,163.00
13 DISBURSED IN IDIS FOR SECTION 108 REPAYMENTS	0.00
14 ADJUSTMENT TO COMPUTE TOTAL EXPENDITURES	0.00
15 TOTAL EXPENDITURES (SUM, LINES 11-14)	278,065.12
16 UNEXPENDED BALANCE (LINE 08 - LINE 15)	117,749.88

**PART III: LOWMOD BENEFIT THIS REPORTING PERIOD**

17 EXPENDED FOR LOW/MOD HOUSING IN SPECIAL AREAS	0.00
18 EXPENDED FOR LOW/MOD MULTI-UNIT HOUSING	0.00
19 DISBURSED FOR OTHER LOW/MOD ACTIVITIES	198,902.12
20 ADJUSTMENT TO COMPUTE TOTAL LOW/MOD CREDIT	0.00
21 TOTAL LOW/MOD CREDIT (SUM, LINES 17-20)	198,902.12
22 PERCENT LOW/MOD CREDIT (LINE 21/LINE 11)	100.00%

**LOW/MOD BENEFIT FOR MULTI-YEAR CERTIFICATIONS**

23 PROGRAM YEARS(PY) COVERED IN CERTIFICATION	PY: PY: PY:
24 CUMULATIVE NET EXPENDITURES SUBJECT TO LOW/MOD BENEFIT CALCULATION	0.00
25 CUMULATIVE EXPENDITURES BENEFITING LOW/MOD PERSONS	0.00
26 PERCENT BENEFIT TO LOW/MOD PERSONS (LINE 25/LINE 24)	0.00%

**PART IV: PUBLIC SERVICE (PS) CAP CALCULATIONS**

27 DISBURSED IN IDIS FOR PUBLIC SERVICES	0.00
28 PS UNLIQUIDATED OBLIGATIONS AT END OF CURRENT PROGRAM YEAR	0.00
29 PS UNLIQUIDATED OBLIGATIONS AT END OF PREVIOUS PROGRAM YEAR	0.00
30 ADJUSTMENT TO COMPUTE TOTAL PS OBLIGATIONS	0.00
31 TOTAL PS OBLIGATIONS (LINE 27 + LINE 28 - LINE 29 + LINE 30)	0.00
32 ENTITLEMENT GRANT	395,815.00
33 PRIOR YEAR PROGRAM INCOME	8,356.33
34 ADJUSTMENT TO COMPUTE TOTAL SUBJECT TO PS CAP	0.00
35 TOTAL SUBJECT TO PS CAP (SUM, LINES 32-34)	404,171.33
36 PERCENT FUNDS OBLIGATED FOR PS ACTIVITIES (LINE 31/LINE 35)	0.00%

**PART V: PLANNING AND ADMINISTRATION (PA) CAP**

37 DISBURSED IN IDIS FOR PLANNING/ADMINISTRATION	79,163.00
38 PA UNLIQUIDATED OBLIGATIONS AT END OF CURRENT PROGRAM YEAR	0.00
39 PA UNLIQUIDATED OBLIGATIONS AT END OF PREVIOUS PROGRAM YEAR	0.00
40 ADJUSTMENT TO COMPUTE TOTAL PA OBLIGATIONS	0.00
41 TOTAL PA OBLIGATIONS (LINE 37 + LINE 38 - LINE 39 +LINE 40)	79,163.00
42 ENTITLEMENT GRANT	395,815.00
43 CURRENT YEAR PROGRAM INCOME	0.00
44 ADJUSTMENT TO COMPUTE TOTAL SUBJECT TO PA CAP	0.00
45 TOTAL SUBJECT TO PA CAP (SUM, LINES 42-44)	395,815.00
46 PERCENT FUNDS OBLIGATED FOR PA ACTIVITIES (LINE 41/LINE 45)	20.00%

