



**City of Bradenton  
Community Development Block Grant Program  
2013-14  
Consolidated Annual Performance Evaluation  
Report (CAPER)**



**Wayne H. Poston, Mayor**

**Staff and Administration**

**Timothy Polk, Planning and Community Development Director  
Vicki White, Housing and Community Development Manager  
Timothy Parks, Housing and Community Development Specialist**

**December 3, 2014**



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

**Community Development Block Grant Program**

**2013-2014 CAPER**

**Mayor**

**Honorable Wayne H. Poston**

**Ward 1**

**Councilman Gene Gallo**

**Ward 2**

**Councilman Gene Brown**

**Ward 3**

**Councilman Patrick Roff**

**Ward 4**

**Councilman, Vice Mayor Bemis Smith**

**Ward 5**

**Councilman Harold Byrd**

**Staff and Administration**

**Timothy Polk, Planning & Community Development Director  
Vicki White, Housing & Community Development Manager  
Timothy Parks, Planning & Community Development Specialist**

# MEMORANDUM

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

CC: Timothy Parks, Housing & Community Development Specialist

FROM: Vicki White, Manager of Housing & Community Development

DATE: December 3, 2014

RE: October 1, 2013-September 30, 2014 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 and presents information on expenditures, caps, and program income.

Attached for the Mayor and City Council's consideration and approval is the October 1, 2013 through September 30, 2014 CAPER. 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 December 31, 2014.

**Recommendations: Requesting a motion to approve and adopt the October 1, 2013-September 30, 2014 Consolidated Annual Performance Evaluation Report for the Community Development Block Grant Program.**



**NOTICE OF PUBLIC HEARING AND AVAILABILITY OF COMMUNITY DEVELOPMENT  
BLOCK (CDBG) GRANT 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, 2013 through September 30, 2014.

Copies of the CAPER will be available at the following location during regular business hours commencing December 15, 2014 and will be available for review and comments until December 31, 2014:

Bradenton City Hall  
101 12<sup>th</sup> St. W.  
Bradenton, FL 34205

Manatee County Public Library  
1301 Barcarrota Blvd.  
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 December 17, 2014 during their regular meeting at 8:30 am in the City Council Chambers located at Bradenton City Hall, 101 12<sup>th</sup> St. Bradenton, FL 34205. The CAPER will be submitted to the U.S. Department of Housing and Urban Development (HUD) by December 31, 2014. 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

**Publish one time: December 5, 2014**



**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.

Over the past year, the city's code enforcement activity exceeded its goal of completing 1,200 initial inspections, actually completing 1,399 inspections. This helps to arrest blight and decay in the identified low and moderate income neighborhoods and ensures that any alterations performed on a building will in accordance with building codes, which leads to a safer building. The code enforcement division began referring dilapidated structures to the city's building department for evaluation under its recently enacted unsafe structures ordinance. Dilapidated structures within the city's local target area that meet the definition of an unsafe structure that need to be demolished will be demolished using CDBG funds. Eighteen structures have been evaluated for demolition so far, and the city is in the process of demolishing them.

**Comparison of the proposed versus actual outcomes for each outcome measure submitted with the consolidated plan and explain, if applicable, why progress was not made toward meeting goals and objectives. 91.520(g). Categories, priority levels, funding sources and amounts, outcomes/objectives, goal outcome indicators, units of measure, targets, actual outcomes/outputs, and percentage completed for each of the grantee's program year goals.**

Goal	Category	Source / Amount	Indicator	Unit of Measure	Expected – Strategic Plan	Actual – Strategic Plan	Percent Complete	Expected – Program Year	Actual – Program Year	Percent Complete
Affordable housing	Affordable Housing	CDBG: \$211805 / Shelter Plus Care: \$86546	Homeowner Housing Rehabilitation	Household Housing Unit	12	7	58.33%	6	3	50.00%
Affordable housing	Affordable Housing	CDBG: \$211805 / Shelter Plus Care: \$86546	Tenant-based rental assistance / Rapid Rehousing	Households Assisted	23	67	291.30%		0	

Affordable housing	Affordable Housing	CDBG: \$211805 / Shelter Plus Care: \$86546	Housing Code Enforcement/Foreclosed Property Care	Household Housing Unit	3600	4922	136.72%		0	
Code Enforcement	Code Enforcement	CDBG: \$125000	Housing Code Enforcement/Foreclosed Property Care	Household Housing Unit	1200	1399	116.58%	1200	1399	116.58%
Homeless Needs	Homeless	Shelter Plus Care: \$220879	Tenant-based rental assistance / Rapid Rehousing	Households Assisted	22	22	100.00%	22	22	100.00%

**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 used its CDBG, SHIP, and Shelter Plus Care funds to assist residents with obtaining and maintaining affordable housing. Affordable housing needs are a high priority identified in the city's Consolidated Plan, as are homeless needs. Through its Shelter Plus Care funding, the city was able to meet the housing needs of 22 chronically homeless households who also suffered from severe mental illness and/or substance abuse disorders. Supportive services were provided by Manatee Glens, which helped program participants maintain their housing and access additional benefits, such as disability payments and food stamps.

The city's housing rehabilitation program assisted households with maintaining their affordable housing. Over the past few years, most participants in this program were elderly, disabled, and/or handicapped. Many of them own their homes outright (have no mortgage), but lack the funds to be able to undertake larger repairs, such as roof repair, new plumbing, or updating electrical, to name a few. Others may need modifications to their home to improve access. For the 2013-14 program year the city assisted one disabled low-moderate income household and one non-disabled low-moderate income household using its CDBG funds. Another moderate income household with a disabled family

member was assisted using SHIP funds..

The city has attempted to produce affordable housing by providing downpayment and closing cost assistance through its SHIP and CDBG programs. However, this activity has been less successful, possibly due to banks' tighter lending guidelines. As a result, money set aside for downpayment assistance through SHIP has been moved to housing rehabilitation and funding set aside through CDBG was reprogrammed to other activities. Since then, the city has received some inquiries about the availability of downpayment assistance, so it will set aside \$60,000 for downpayment assistance through its SHIP program for the 2014-15 program year.

Code enforcement was a medium priority for the city, with two code enforcement officers working in low and moderate income census tracts. However, this activity provides a more suitable living environment in these neighborhoods by arresting blight and decay as well as advising residents on code compliance. These code enforcement officers also refer properties to the building department for assessment when they appear dilapidated to the point that they may be dangerous.

Funds programmed for housing rehabilitation were reprogrammed to fund a clearance project in order to ensure that properties that pose an immediate danger to life and health are removed from the neighborhood. However, the environmental review process on this activity was not completed until October 10, 2014, after the 2013-14 program year ended. Since then, the activity has commenced with the receipt of the Removal of Grant Condition, so activities undertaken for this project will be reported in the 2014-15 CAPER.

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

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

91.520(a)

	CDBG	HOME	HOPWA
White	1	0	0
Black/African-American	1	0	0
Asian	0	0	0
American Indian or American Native	0	0	0
Native Hawaiian or Other Pacific Islander	0	0	0
Hispanic	0	0	0
Not Hispanic	2	0	0
<b>Total</b>	<b>2</b>	<b>0</b>	<b>0</b>

### Narrative

The code enforcement activity reports accomplishments in terms of housing units, rather than the types of households served. The clearance (or demolition) activity did not start this year, but once it does it will also report accomplishments in housing units. The 2013-14 housing rehabilitation activity was canceled and the funds reprogrammed to another activity. However, two housing rehabilitation projects were completed during this program year using 2012-13 program year funds. One beneficiary was an African American household, who had accessibility features installed in addition to general repair work. The other household was a White household whose home needed a new roof and some minor interior repairs. A third White family was assisted using SHIP funds.

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

### Identify the resources made available

Source of Funds	Source	Expected Amount Available	Actual Amount Expended Program Year X
CDBG		421,106	180,218
Other	Shelter Plus Care	220,876	224,494
Other	State Housing Initiatives Partnership	86,546	224,494
Other	U.S. Treasury Hardest Hit Fund	16,200	224,494

Table 2 – Resources Made Available

### Narrative

The city spent less than expected on its activities in 2013-14. For example, code enforcement was budgeted for \$125,000 and the actual expenditure was \$96,016.57. The 2013-14 housing rehabilitation project was canceled. These unused funds were reprogrammed to other activities, including two affordable multifamily rental projects and a street lighting project in the Village of the Arts, which is located in a low and moderate income census tract. However, there were two housing rehabilitation projects completed in the 2013-14 program year, using 2012-13 funds totaled \$76,824.68. The clearance (demolition) activity did not begin in the program year, due to the time required to complete the environmental review.

The city used \$159,837.00 of the \$220,876 available for homeless housing assistance through its two Shelter Plus Care grants. This may be due to the fact that most participants were able to pay a portion of their rent and that all of the properties rented through the program were rented at below-market rates. The city did not renew these grants for the 2014-15 program year.

The city rehabilitated one housing unit belonging to a moderate-income family using \$64,657.00 in SHIP funds. This family had a disabled family member, so in addition to the repair work, accessibility features were added to the home, including wheelchair ramps, a wider doorway from the kitchen to the garage, and a handicapped-accessible bathroom. The bathroom had to be constructed so that a wheelchair-bound person would be able to maneuver in it with their legs

extended. It included a roll-in shower.

The city expected to receive \$16,200 in fees for service assisting households throughout the Bradenton-Sarasota-North Port Metropolitan Statistical Area (MSA) through the Hardest Hit program. These funds could be used for administrative purposes. The funding for assisting households was provided through the Florida Housing Finance Corporation.

**Identify the geographic distribution and location of investments**

Target Area	Planned Percentage of Allocation	Actual Percentage of Allocation
1.01; 1.03; 6.01; 6.02; 7.02; 7.03; 1.04		
1.03 1		
1.03 B/G 1,2,3, 7.03 2,3,4	30	30
6.01	5	5
7.02		
7.02 5		
7.03 B/G 1		
7.03 B/G 2,3, 1.01 B/G 2, 1.03 B/G 1,2,3, 7.02 2,3,4,5,6	25	25

Table 3 – Identify the geographic distribution and location of investments

**Narrative**

The city's code enforcement activity operated within the census tracts noted in the chart above. One housing rehabilitation project was completed in census tract 1.03, and another one was completed in census tract 4.08. The housing rehabilitation project completed using SHIP funds was located in census tract 5.03. About half of the Shelter Plus Care program participants rented units in census tract 1.03, while the rest rented units outside of Bradenton city limits. Applicants for the Florida Hardest Hit program were located throughout the MSA, with the majority of them coming from the North Port-Port Charlotte area.

**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 used its CDBG funds to leverage local funds through the code enforcement project. Specifically, the funds provided funding for two code enforcement officers who operate exclusively in low and moderate income neighborhoods. Other neighborhoods within the city are covered by two code enforcement officers paid out of the city's general revenue fund.

The Shelter Plus Care program had matching requirements, which were met by the supportive services provided by Manatee Glens to program participants. Through a combination of services provided, Manatee Glens was able to exceed the amount of matching funds required for the grant.

The housing rehabilitation project was leveraged with SHIP funds from the state.

## 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	22	22
Number of Non-Homeless households to be provided affordable housing units	6	1
Number of Special-Needs households to be provided affordable housing units	2	2
<b>Total</b>	<b>30</b>	<b>25</b>

Table 4 – Number of Households

	One-Year Goal	Actual
Number of households supported through Rental Assistance	22	22
Number of households supported through The Production of New Units	0	0
Number of households supported through Rehab of Existing Units	8	3
Number of households supported through Acquisition of Existing Units	0	0
<b>Total</b>	<b>30</b>	<b>25</b>

Table 5 – Number of Households Supported

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

The city originally budgeted \$211,805 for housing rehabilitation, which could be used to serve homeowners with special needs, such as wider doorways, wheelchair ramps, walk-in showers, handrails, as well as homeowners whose homes were in need of general repair. Most of the customers for this program were elderly and/or disabled and on limited incomes. The housing rehabilitation program enabled them to remain in an affordable home and helped to arrest blight in neighborhoods.

However, the citizens of the City of Bradenton did not consider this an effective use of CDBG funding, preferring to fund projects that have a wider impact, such as public improvements. The funds set aside for housing rehabilitation were reprogrammed through the substantial amendment

process on April 30, 2014 to a clearance (demolition) activity that removes blighted structures from neighborhoods.

The city will continue to use its State Housing Initiatives Partnership (SHIP) funds for housing-related activities as those funds are available, since they cannot be used for other purposes, such as public improvements. For the program year July 1, 2013-June 30, 2014, the city received \$86,546 and for the program year July 1, 2014-June 30, 2015, the city will receive \$233,672 in SHIP funding.

The city assisted people who were chronically homeless with substance abuse disorders and/or mental illness through its two Shelter Plus Care grants. Many of the participants in the program had been able to maintain their housing for five years or more. Manatee Glens provided the homeless outreach and supportive services for this program, and they worked diligently to develop good relationships with landlords who owned units that were decent, safe and sanitary for program participants to rent. The city decided not to renew the grants for the following year, so rental assistance to all participants ceased as of June 30, 2014.

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

The city's ability to serve low-moderate income families with housing needs, including those with special needs will be limited and based upon State funding of the SHIP program. Over the past several years the program has been underfunded or not funded at all. During the years that the SHIP program is not funded, the city will not be able to meet housing needs, which are a high priority identified in the Consolidated Plan and Annual Action Plan. Over the past program year the city has received inquiries regarding the support of affordable multifamily housing projects, and in a substantial amendment to the 2013-14 Action Plan on November 19, 2014 provided funding for two of these projects. Projects such as these may provide a method of meeting the city's affordable housing needs in future years.

**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>HOME Actual</b>
Extremely Low-income	22	0
Low-income	3	0
Moderate-income	0	0
<b>Total</b>	<b>25</b>	<b>0</b>

**Table 6 – Number of Persons Served**

### **Narrative Information**

The city was able to accomplish its goal of providing 22 homeless households with housing that was decent, safe and sanitary through its participation in the Shelter Plus Care program.

However, the city ended its participation in this program June 30, 2014. The city has a homeless prevention strategy through its SHIP program that provides renters with funds for the first, last, and security deposits needed to get into an apartment. If citizens are behind on their rent or mortgage through no fault of their own, this strategy will help them bring their accounts current, up to \$2,000. This program was funded for \$6,000 this year. Future funding is dependent upon whether or not the State funds the SHIP program. The same is true of the housing rehabilitation program. The city may be able to assist people who are homeless or at risk of homelessness using CDBG funding, subject to the public services funding cap.

The CDBG program funded a downpayment/closing cost assistance activity in 2012-13, but did not receive any viable applications for this program, so it was canceled in early 2014. Since then the city has received inquiries from lenders, real estate agents and private individuals about funding for this activity, so the city may revisit this strategy in the next program year.

## **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.**

Among the supportive services provided by Manatee Glens through the Shelter Plus Care program was homeless outreach. This outreach provided access to other services and benefits, such as health care and disability benefits, and helped Manatee Glens find people who might be candidates for the Shelter Plus Care program. As a result, the program was able to provide shelter to 21 single people and a mother with two young children. This program was discontinued June 30, 2014.

The city participates in the Manatee-Sarasota Continuum of Care, attending meetings with other service providers, such as Salvation Army, Turning Points, and Manatee County's Neighborhood Services Department. The intent of these meetings is to assist agencies in working together in ending homelessness in the Metropolitan Statistical Area (MSA). The Continuum of Care is a valuable data resource, which aids the city in defining homeless needs.

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

The city provided referrals to agencies that assist people who are homeless when they called the city inquiring about housing programs. The city will continue to provide these referrals in the future; and will fund programs that address these needs as funding permits. Historically, the city has received applications for funding from these agencies which fell in the public service category, so they were subject to the 15% funding cap.

**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 Shelter Plus Care program, with its rental assistance and accompanying supportive services, helped families who were chronically homeless with severe mental illness and/or substance abuse disorders obtain and maintain permanent housing. Several of the program participants were able to maintain their housing for a number of years.

The Salvation Army of Manatee County provides shelter for women with children, as well as men. Women with children are enrolled in a program that teaches them self-sufficiency so that they are eventually able to move out of the shelter and live independently. The program teaches them such skills as budgeting, parenting, and finding a job.

SafePlace2Be operates a voluntary runaway shelter for youth in Bradenton. In addition to shelter, the organization provides the youth case management and counseling. The primary focus of this shelter is to reunite runaway youth with their families.

**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.**

Meeting the needs of these populations was one of the goals of the Shelter Plus Care program. The city also provided referrals to service providers, such as Turning Points, that could help people from becoming homeless or help people who are at risk of homelessness through programs that provide security deposit and rental assistance. Turning Points provides other

services, such as food, showering and laundry facilities, and computers that people can use to search and apply for jobs.

Project Heart helps school-aged children who are homeless with items such as backpacks, school supplies, and tutoring. Feeding Empty Little Tummys (F.E.L.T.) also assists school-aged children by supplying them with backpacks filled with food for the weekend. The backpacks are returned to the school on Monday to be refilled. These two programs ensure that children have the tools they need to succeed in school.

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

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

The city's public housing stock is in good condition, although a few properties are approximately 40 years old. The Bradenton Housing Authority (BHA) is planning on redeveloping these properties in the future to better utilize the land and modernize the housing so that it is more accessible and energy-efficient. There continues to be a need for affordable housing in the city, particularly for people who are extremely low income (at or below 30% of the area median income). However, the city and the housing authority have little control over funding for public housing, which provides units affordable to families at this income level. This funding is controlled at the federal level.

Another need for larger families, regardless of whether they are public housing residents or not, is larger unit sizes to accommodate these families. There are a limited number of three-bedroom public housing units. For participants in the Housing Choice Voucher program, they have access to more units that are three bedrooms. There are no four-bedroom units for rent within the City of Bradenton. Manatee County has one complex, Sabal Cove, which has a few four bedroom, three bath units. In the future, the city will recommend that four-bedroom units be a part of any affordable housing built within the city.

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

The Bradenton Housing Authority operates a Family Self-Sufficiency program that helps public housing residents become independent. BHA has also recently reactivated its Resident Advisory Board and added a public housing resident to its Board of Commissioners. Recently, the agency underwent a management change, hiring a new executive director. Since the new executive director has public housing experience, residents may have additional opportunities to participate in the management of the housing authority as well as additional opportunities for becoming homeowners if they so desire.

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

Neither the Bradenton Housing Authority or the Manatee County Housing Authority are considered troubled at this time.

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

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

The City of Bradenton offers a number of incentives for the construction of affordable housing in the city, such as expedited review, fee waivers, density bonuses, setback and parking reductions, to name a few. There are some areas of the city that must comply with the city's form-based code requirements. However, these requirements are not so complex that they could negatively affect the construction of affordable housing. The city does not have any policies that affect the return on residential investment.

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

Affordable housing, particularly affordable multifamily rental housing, that is safe, decent and sanitary continues to be a high priority need in the city. The city is working with the developer of a 221(d)(4) property that will provide affordable rental housing for moderate-income families. Two other affordable housing developers requested and received funds for the development of affordable multifamily rental properties using tax credits issued through the Florida Housing Finance Corporation. The city will continue to review and support affordable housing projects, particularly those that serve households at lower income levels.

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

The city preserved affordable housing by rehabilitating three housing units, using a combination of SHIP and CDBG funding. Two of these units were owned by households that were disabled, so accessibility features were installed in addition to repairs. However, this year the city decided that rehabilitating homes was not a good use of its CDBG funds, so funds available for housing rehabilitation were reprogrammed to other activities that would have a wider impact on residents of the City of Bradenton. These activities included the two affordable multifamily rental properties mentioned above and street lights in the Village of the Arts, which is located in a low and moderate income census tract.

The city will continue to use its SHIP funds to preserve affordable housing. However, one obstacle to meeting this need in this manner is the availability of SHIP funding. The program has not been fully funded since the 2008-09 program year, due to the fact that the Florida Legislature keeps sweeping the housing trust funds into the state's general revenue fund. Therefore, future attempts by the city to preserve affordable housing will be dependent upon whether or not the Florida Legislature chooses to leave the housing trust fund money in the housing trust fund.

The city addressed the presence of lead-based paint through its housing rehabilitation program, and will continue to do so as funds are available. However, a recent study found that children are far more likely to ingest lead from miniblinds and toys, so this indicates that this is something that will be addressed through parent education programs offered in the city by organizations such as the Manatee Community Action Agency, Manatee County Health Department, and Manatee County Rural Health Services.

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

The Central Community Redevelopment Agency (CCRA) continued its work on bringing a grocery store to an underserved area of Bradenton, near some of the Bradenton Housing Authority's properties. This grocery store will bring the option of affordable fresh food to an area that has been designated as a food desert. The CCRA applied for CDBG funding to help develop this project, which will be considered an economic development project for the number

of jobs it creates.

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

New leadership at the Bradenton Housing Authority brings the possibility of enhanced coordination between the housing authority, the city, and the local community redevelopment agencies. The city's planning director, who is also the director of the Central Community Redevelopment Agency (in which the housing authority's properties are located), has met with the executive director of the housing authority to get acquainted and discuss the possibility of partnering on projects, particularly redevelopment projects that will benefit citizens of the community.

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

As stated above, the city is a member of the Sarasota-Manatee Continuum of Care and attends their meetings with other local government representatives and social service agencies. Information obtained from these meetings can help the city identify which agencies are providing assistance such as rental assistance, deposits, food, and other items that may be needed by the city's lowest income residents.

The city's planning director, who is also the executive director of the Central Community Redevelopment Agency has met with the new director of the Bradenton Housing Authority in order to foster better coordination between the city, housing authority and CCRA. The housing authority's properties are all located within the CCRA's boundaries. Since the city receives numerous inquiries regarding housing needs, the city keeps track of when the Bradenton Housing Authority as well as the Manatee County Housing Authority are taking applications.

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

The impediments to fair housing choice within the City of Bradenton are as follows: development costs for housing, inadequate financial literacy education, disparity of loan originations among racial groups, lack of local enforcement of Fair Housing law, predatory lending, and limited income.

The city offers a number of incentives for the construction of affordable housing, including expedited approval and permitting, fee waivers, and density bonuses, to name a few. When two developers recently approached the city about building affordable housing, city staff advised them of these incentives. The city will continue to advise affordable housing developers that these incentives are available.

There are a number of agencies in the area that provide financial literacy courses, such as the Salvation Army, Goodwill, the Women's Resource Center, and Consumer Credit Counseling of Southwest Florida. Goodwill provides first-time homebuyer education, which includes credit counseling. The Manatee Community Action Agency also provides first-time homebuyer education. Applicants to the city's downpayment assistance program are required to take these classes prior to receiving assistance. These classes, along with financial literacy classes help families to become successful homeowners. The city also provides literature on people's rights concerning consumer finance.

The city, through its CDBG program and other funding is assisting with the construction of a grocery store and retail plaza near one of the Bradenton Housing Authority's properties. In addition to healthy food options, this project will provide jobs for some of the city's residents, making it an economic development activity.

The city (and Manatee County) continue to refer all housing discrimination complaints to the Tampa Fair Housing office, since there is no local Fair Housing office. The city provides literature on peoples' Fair Housing rights. Since there are no plans for a local Fair Housing office in the foreseeable future, the city will continue to advise those with Fair Housing complaints to the Tampa office.

The disparity of loan origination among racial groups and predatory lending practices are a bit more difficult to address. Reform of lending practices nationwide has put an end to more egregious practices. However, there are only two lenders located in low and moderate income neighborhoods in the city- the Manatee Community Credit Union and Florida Central Credit Union. There has not been a push by banking institutions to locate in low and moderate income census tracts in the past year.

The best solution to the disparity of loan origination among racial groups is the education provided through financial literacy and first-time homebuyer classes offered by organizations throughout the MSA. Some of these organizations, such as Goodwill and MCAA offer credit counseling in conjunction with the first-time homebuyer classes. The city has literature available on the Equal Credit Opportunity Act along with literature on Fair Housing.

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

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

For in-house applicants, such as the Building and Code Enforcement divisions, the program offers technical assistance as needed, so that these applicants are able to accurately document their furtherance of the plan's goals. For these activities, the city places an emphasis on working with minority and women-owned businesses. For outside applicants, the program provides technical assistance and on-site monitoring to ensure that the activities are carried out according to the subrecipient contract in furtherance of the plan's goals.

For activities such as public facilities, the program continues to monitor these improvements to ensure that they continue to be used as intended. If a facility constructed using CDBG funds is not publicly owned, such as the retail plaza that will be funded in part through CDBG, a Land Use Restriction Agreement (LURA) is put in place. This ensures that the facility continues to meet its intended purpose of benefiting low and moderate income households for a period of

time, up to 15 years. These facilities are checked annually to ensure that they continue to be used as intended.

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

The availability of the CAPER is advertised in the local paper and on the city's website, and the CAPER itself is made available as an electronic copy on the city's website. A hard copy is available in the City Clerk's office at Bradenton City Hall and at the Manatee County library. The availability of the CAPER is advertised at least ten days prior to its adoption by the Mayor and City Council.

**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.**

In an effort to make the best use of its limited CDBG funds, the city decided to concentrate on activities that can have a broader impact on its residents. As a result, the city will no longer fund housing rehabilitation through its CDBG program. It will use SHIP funding instead to preserve affordable housing in the community. For the next Consolidated Plan, the city will designate a local target area in which it will spend the majority of its funds in an effort to improve the community. The city may eventually designate this area a Neighborhood Revitalization Strategy Area (NRSA) to provide some additional flexibility on funding activities.

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

No

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

**Appendix A-**  
**PR26-CDBG Financial Summary Report**



**PART I: SUMMARY OF CDBG RESOURCES**

01 UNEXPENDED CDBG FUNDS AT END OF PREVIOUS PROGRAM YEAR	0.00
02 ENTITLEMENT GRANT	421,006.00
03 SURPLUS URBAN RENEWAL	0.00
04 SECTION 108 GUARANTEED LOAN FUNDS	0.00
05 CURRENT YEAR PROGRAM INCOME	29,200.06
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)	450,206.06

**PART II: SUMMARY OF CDBG EXPENDITURES**

09 DISBURSEMENTS OTHER THAN SECTION 108 REPAYMENTS AND PLANNING/ADMINISTRATION	148,096.03
10 ADJUSTMENT TO COMPUTE TOTAL AMOUNT SUBJECT TO LOW/MOD BENEFIT	0.00
11 AMOUNT SUBJECT TO LOW/MOD BENEFIT (LINE 09 + LINE 10)	148,096.03
12 DISBURSED IN IDIS FOR PLANNING/ADMINISTRATION	84,201.20
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)	232,297.23
16 UNEXPENDED BALANCE (LINE 08 - LINE 15)	217,908.83

**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	148,096.03
20 ADJUSTMENT TO COMPUTE TOTAL LOW/MOD CREDIT	0.00
21 TOTAL LOW/MOD CREDIT (SUM, LINES 17-20)	148,096.03
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 BENEFITTING 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	421,006.00
33 PRIOR YEAR PROGRAM INCOME	0.00
34 ADJUSTMENT TO COMPUTE TOTAL SUBJECT TO PS CAP	0.00
35 TOTAL SUBJECT TO PS CAP (SUM, LINES 32-34)	421,006.00
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	84,201.20
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)	84,201.20
42 ENTITLEMENT GRANT	421,006.00
43 CURRENT YEAR PROGRAM INCOME	29,200.06
44 ADJUSTMENT TO COMPUTE TOTAL SUBJECT TO PA CAP	0.00
45 TOTAL SUBJECT TO PA CAP (SUM, LINES 42-44)	450,206.06
46 PERCENT FUNDS OBLIGATED FOR PA ACTIVITIES (LINE 41/LINE 45)	18.70%



**LINE 17 DETAIL: ACTIVITIES TO CONSIDER IN DETERMINING THE AMOUNT TO ENTER ON LINE 17**  
 Report returned no data.

**LINE 18 DETAIL: ACTIVITIES TO CONSIDER IN DETERMINING THE AMOUNT TO ENTER ON LINE 18**  
 Report returned no data.

**LINE 19 DETAIL: ACTIVITIES INCLUDED IN THE COMPUTATION OF LINE 19**

Plan Year	IDIS Project	IDIS Activity	Voucher Number	Activity Name	Matrix Code	National Objective	Drawn Amount
2012	4	561	5658028	Project Delivery-Single-Family Housing Rehabilitation	14H	LMH	\$10.00
2012	4	561	5663467	Project Delivery-Single-Family Housing Rehabilitation	14H	LMH	\$350.00
2012	4	561	5680305	Project Delivery-Single-Family Housing Rehabilitation	14H	LMH	\$310.00
2012	4	561	5690442	Project Delivery-Single-Family Housing Rehabilitation	14H	LMH	\$547.60
2012	4	561	5721096	Project Delivery-Single-Family Housing Rehabilitation	14H	LMH	\$69.50
2012	4	561	5730523	Project Delivery-Single-Family Housing Rehabilitation	14H	LMH	\$59.20
2012	4	562	5710964	Single Family Housing Rehabilitation Activity	14A	LMH	\$16,207.57
2012	4	562	5711377	Single Family Housing Rehabilitation Activity	14A	LMH	\$13,475.73
2012	4	562	5723987	Single Family Housing Rehabilitation Activity	14A	LMH	\$19,942.86
2012	4	568	5633451	Single-Family Housing Rehabilitation	14A	LMH	\$1,107.00
2013	2	569	5636899	Code Enforcement Activities	15	LMA	\$649.68
2013	2	569	5646589	Code Enforcement Activities	15	LMA	\$19,140.05
2013	2	569	5658028	Code Enforcement Activities	15	LMA	\$18,816.77
2013	2	569	5663467	Code Enforcement Activities	15	LMA	\$85.00
2013	2	569	5667853	Code Enforcement Activities	15	LMA	\$646.00
2013	2	569	5680305	Code Enforcement Activities	15	LMA	\$11,716.16
2013	2	569	5690442	Code Enforcement Activities	15	LMA	\$5,862.94
2013	2	569	5710964	Code Enforcement Activities	15	LMA	\$5,949.09
2013	2	569	5721096	Code Enforcement Activities	15	LMA	\$13,255.97
2013	2	569	5730523	Code Enforcement Activities	15	LMA	\$15,208.02
2013	2	569	5734553	Code Enforcement Activities	15	LMA	\$4,686.89
<b>Total</b>							<b>\$148,096.03</b>

**LINE 27 DETAIL: ACTIVITIES INCLUDED IN THE COMPUTATION OF LINE 27**  
 Report returned no data.

**LINE 37 DETAIL: ACTIVITIES INCLUDED IN THE COMPUTATION OF LINE 37**

Plan Year	IDIS Project	IDIS Activity	Voucher Number	Activity Name	Matrix Code	National Objective	Drawn Amount
2013	1	573	5636899	CDBG Program Administration	21A		\$12,194.62
2013	1	573	5646589	CDBG Program Administration	21A		\$10,992.39
2013	1	573	5667853	CDBG Program Administration	21A		\$11,457.95
2013	1	573	5680305	CDBG Program Administration	21A		\$440.33
2013	1	573	5690442	CDBG Program Administration	21A		\$10,677.25
2013	1	573	5721096	CDBG Program Administration	21A		\$215.53
2013	1	573	5723987	CDBG Program Administration	21A		\$477.37
2013	1	573	5730523	CDBG Program Administration	21A		\$35,843.93
2013	1	573	5734553	CDBG Program Administration	21A		\$1,901.83
<b>Total</b>							<b>\$84,201.20</b>