

Program Year 2021 CDBG Community Development Block Grant Program Recommendations

<u>Public Service Activities</u>	<u>CDAC Recommendation</u>	<u>First Selectman's Final Recommendation</u>
Boys & Girls Club of Greenwich - Friday Night Teen Program	\$ 5,000.00	\$ 5,652.33
Coffee for Good Program	\$ 8,000.00	\$ 8,652.35
Community Centers, Inc. - Citizenship Program	\$ 5,000.00	\$ 5,652.33
Community Health Center, Inc. - Senior Dental Program	\$ 7,000.00	\$ 7,652.33
Family Centers, Inc. - Armstrong Court Preschool Program	\$ -	\$ -
Family Centers, Inc. - RITE (Reaching Independence Through Employment) Program	\$ 5,000.00	\$ 5,652.33
Family Centers, Inc. - Dental Program	\$ -	\$ -
Food Bank of Lower Fairfield County, Inc. - Food Bank Program Administrative Support	\$ 7,000.00	\$ 7,652.33
Greenwich United Way - Early Childhood Achievement Gap Solutions (ECAGS)	\$ 5,629.00	\$ 6,281.33
Inspirica, Inc. - Women's Housing Program Case Manager/Life Planning Coach	\$ 5,000.00	\$ 5,652.33
Jewish Family Services of Greenwich - Supermarketing for Seniors Program	\$ 7,000.00	\$ 7,652.33
Kids in Crisis, Inc. - SafeHaven for Kids	\$ 7,000.00	\$ 7,652.33
Liberation Programs - Recovery Coach for Mobile Wellness Var	\$ 7,000.00	\$ 7,652.33
Meals on Wheels of Greenwich - Support for Food Service Program	\$ 5,000.00	\$ 5,000.00
Old Greenwich Riverside Community Center - OGRCC Childcare Program	\$ 7,000.00	\$ 7,652.33
Opening Doors Fairfield County - Eviction Prevention Program	\$ 5,000.00	\$ 5,652.33
Pacific House - Emergency Meals Program	\$ 8,000.00	\$ 8,652.35
Pathways - Cognitive Remediation Program	\$ -	\$ -
Pathways - YMCA Memberships	\$ 6,000.00	\$ 6,652.33
Town of Greenwich Department of Human Services - BANC After School Program	\$ 5,243.00	\$ 5,895.33
Transportation Association of Greenwich - Feed Greenwich Home Delivery	\$ -	\$ -
Wheel it Forward - Durable Medical Equipment Library	\$ 8,000.00	\$ 8,652.35
Young Artists Philharmonic - Scholarships for Students	\$ 6,650.00	\$ 7,302.33
YWCA Greenwich - Domestic Violence Crisis Intervention Services	\$ -	\$ -
Maximum Allowable Public Service Allocation (16.25% cap - \$131,390 maximum)	\$ 119,522.00	\$ 131,264.00

<u>Public Facility/Housing Activities</u>	<u>CDAC Recommendation</u>	<u>First Selectman's Final Recommendation</u>
Abilis, Inc. - 101 Orchard Street Kitchen Renovation	\$ 72,836.40	\$ 72,836.40
Abilis, Inc. - 45 Pemberwick Road Air Conditioners	\$ 14,520.00	\$ 14,520.00
Boys & Girls Club of Greenwich - Pool Ionization	\$ 19,000.00	\$ 19,000.00
Community Centers, Inc. - ADA Chairlift	\$ -	\$ -
Family Centers, Inc. - HVAC Replacements	\$ 55,000.00	\$ 55,000.00
Housing Authority of the Town of Greenwich - Agnes Morley Heights Window Replacement	\$ 165,775.46	\$ 165,775.46
Inspirica, Inc. - Gilead House Boiler Replacement	\$ 42,500.00	\$ 42,500.00
Neighbor to Neighbor - COVID-19 Air Filtration and UV Systems	\$ 56,300.00	\$ 56,300.00
Pacific House - Emergency Shelter Lockers	\$ 7,568.00	\$ 7,568.00
River House - Carpet Replacement	\$ 16,000.00	\$ 16,000.00
YMCA - ADA Pool Project	\$ 8,000.00	\$ 8,000.00
YWCA - Boiler Replacement	\$ 75,000.00	\$ 75,000.00
Total Available for Public Facility Activities (\$532,499.86)	\$ 532,499.86	\$ 532,499.86

<u>Planning and Administration</u>	<u>CDAC Recommendation</u>	<u>First Selectman's Final Recommendation</u>
Program Year 2021 Planning and Administration	\$ 159,363.00	\$ 159,363.00
CDBG Administration PY2021 (20% Cap - \$159,363 maximum)	\$ 159,363.00	\$ 159,363.00

Actual Entitlement for CDBG Program Year 2021	\$ 808,557.00
Reprogrammed Funds to Program Year 2021	\$ 14,569.86
Total Funding Available for PY2021	\$ 823,126.86

Executive Summary

AP-05 Executive Summary - 24 CFR 91.200(c), 91.220(b)

1. Introduction

The Program Year 2021 (PY2021) Annual Action Plan (AAP) is the second installment in the Town of Greenwich's 2020-2024 Five Year Consolidated Plan. The 2021 AAP identifies the activities to be funded and actions to be undertaken during PY2021 (July 1, 2021 – June 30, 2022) to provide opportunities and services that primarily benefit low- and moderate-income residents of the Town of Greenwich. For a detailed summary, refer to the project summary information section.

As a recipient of CDBG entitlement funding, the PY2021 AAP serves as the Town of Greenwich's planning document for the activities to be funded under the CDBG Program, guided by the citizen participation process utilizing maximum citizen input; an application for federal funds under the U.S. Department of Housing and Urban Development (HUD) formula grant programs; a guide to be followed in carrying out HUD programs; and a plan that provides a basis for measuring performance and tracking goals.

The proposed activities during PY2021 are divided into three (3) categories - Public Service programs, Public Facility/Housing/Capital Improvement projects and Administration. The proposed activities are as follows:

Public Service Programs

- Teen programming;
- Vocational training for those with mental disabilities;
- Citizenship program;
- Comprehensive dental health services for low-income seniors;
- Preschool program for children from low-income families;
- Employment training program for low-income individuals;
- Food bank program;
- Employment and career programs for homeless women;
- Shopping and case management services for frail elderly;
- Counseling and supportive services for at-risk children and youth;
- Food service (meal preparation and delivery);
- Food pantry program;
- Educational support programs for children from low-income families;
- Durable medical equipment lending library;
- Homeless shelter and supportive services; and

- Domestic abuse/violence victim support and services.

Capital Improvement/Housing Projects

- Improvements (renovations including flooring, kitchens and bathrooms) at public facilities that serve individuals with developmental disabilities;
- Improvements (windows/energy efficiency/security improvements) at a public facility where educational programs and character building activities are offered to youths from low-income households;
- Improvements (ADA entrance accessibility) at a public facility providing outpatient mental health services and other human services to children and adults;
- Improvements (accessibility/mobility) at a public facility providing cultural opportunities to senior citizens and others;
- Improvements (accessibility/lower-level entrance) at the main branch of the public library;
- Improvements (playground construction) at a public housing development for low- and moderate-income residents;
- Improvements (elevator) to a permanent supportive housing development;
- Improvements (shelter bed replacement) at a 24/7 homeless shelter;
- Improvements (flooring replacement) at a residential facility for the elderly;
- Improvements (generator) at a group home for adults with chronic and debilitating mental illness; and
- Improvements (video surveillance system) at a public facility providing youth services.

The proposed projects to be undertaken during PY2021 support goals detailed in the Consolidated Plan and Strategic Plan to address the obstacles in meeting underserved needs.

2. Summarize the objectives and outcomes identified in the Plan

This could be a restatement of items or a table listed elsewhere in the plan or a reference to another location. It may also contain any essential items from the housing and homeless needs assessment, the housing market analysis or the strategic plan.

Please refer to AP-20 of this Annual Action Plan for objectives and outcomes in Program Year 2021.

3. Evaluation of past performance

This is an evaluation of past performance that helped lead the grantee to choose its goals or projects.

In evaluating its past performance as related to selecting projects that meet the goals and objectives of the 2020-2024 Consolidated Plan, the Town of Greenwich looked at numbers served in 2019 by Public Service providers (the most recently completed Program Year), as nearly all of the 2019 Public Service providers applied for funding in 2021 (in addition to several new organizations, who were evaluated for their ability to deliver unique, unduplicated services). Public Service providers served 10,802 individuals in 2019 – up from 9,546 in 2018. Nearly 99% of those served in PY2019 were low-/moderate-income. Applicants for Public Service funding have demonstrated an ability to spend funds in a timely manner and serve a broad cross-section of vulnerable residents in the Greenwich community, including: senior citizens, youth, those who are homeless or at risk of homelessness, victims of domestic abuse, job seekers and the food insecure.

In identifying Public Facility/Capital Improvement projects to fund in 2021, the Town carefully evaluated size/scope of projects and past performance, as timely spending has been an issue for two consecutive CDBG Program years. Projects selected were deemed necessary and in compliance with Consolidated Plan goals.

4. Summary of Citizen Participation Process and consultation process

Summary from citizen participation section of plan.

At the conclusion of the citizen participation process, a total of seven (7) public meetings and three (3) public hearings will have been held to solicit ideas and comments from residents as well as housing, health and social service providers on the needs of low-income individuals/households in Greenwich, and how the proposed activities would be an adequate response to the identified needs. The COVID-19 outbreak has impacted how the Town typically distributes physical copies of the proposed 2021 Action Plan, as residents and interested stakeholders have relied more on digital/online resources in order to maintain physical distancing and comply with limited hours/availability at libraries, Town Hall and other physical locations. To ensure that the 2021 AAP is made accessible and available to the general public, a draft copy for comment was posted on the Town of Greenwich’s website, with a physical and online newspaper advertisement directing people to the web version. The Town has updated its Policies and Procedures for citizen participation to align with guidance provided by HUD to address changes due to COVID-19. For a more detailed summary of the citizen participation process, see Attachment #1.

Citizen Participation and Opportunities for Engagement:

Attachment #1 “Citizen Participation” provides a summary of citizen input, comments, and recommendations. Attachment #1 documents the citizen participation process and includes (but not limited to) the following:

1. Citizen participation plan/calendar for Program Year 2021;

2. Community Development Advisory Committee membership list;
3. Minutes of public meetings and public hearings held;
4. Public notices related to the 2021 AAP;
5. CDAC funding recommendations for PY2021; and
6. First Selectman funding recommendations for PY2021.

A copy of the draft PY2021 Annual Action Plan was also shared with the City of Stamford, as Greenwich and Stamford often times have overlapping projects/goals and mutual community partners serving the needs of low- and moderate-income residents.

5. Summary of public comments

This could be a brief narrative summary or reference an attached document from the Citizen Participation section of the Con Plan.

All comments related to the CDBG Program in will be incorporated into the Final 2021 Annual Action Plan (see Attachment #1). No formal written comments have been submitted to the Community Development Office at time of publication. Recommendations from the Community Development Advisory Committee were incorporated into the final Annual Action Plan via recommended funding levels.

6. Summary of comments or views not accepted and the reasons for not accepting them

To date no comments or views have been received outside of those expressed by the Community Development Advisory Committee during their public hearings and meetings. No comments from those hearings/meetings were not accepted.

7. Summary

Maximum citizen participation is evident and achieved through the composition of the Community Development Advisory Committee (CDAC). The CDAC is the advisory committee to the First Selectman, and its primary role is to provide maximum citizen input as reflected through its membership. The Community Development Office works with the CDAC to identify the activities (program services, rehabilitation projects, and acquisition projects) that will be recommended to receive CDBG funding. The CDAC held two public meetings and one public hearing during the PY2021 AAP planning process. CDAC members also conducted on-site and remote visits in order to properly evaluate and assess the proposed activities and recommend those that meet the needs of the community. CDAC members consist of representatives from:

- Each of the twelve districts of the Representative Town Meeting (represents the community as a whole)
- Board of Estimate and Taxation (represents the community as a whole)

- Board of Human Services (represents clients who are mostly low- and moderate-income residents including minorities, non-English speaking persons as well as persons with disabilities)
- First Selectman's Advisory Committee for People with Disabilities
- Board of Health (represents the community as a whole)
- Planning and Zoning Commission (represents local organizations including businesses and developers)
- NOW – Greenwich Chapter (represents minorities)
- League of Women Voters
- Housing Authority of the Town of Greenwich

CDAC appointments run on a two-year term to ensure that the groups represented can identify new individuals who are interested in serving. This allows for maximum citizen participation. The citizen participation calendar was posted on the Town website to ensure that the public was made aware of the scheduled public hearings and meetings. In addition, the calendar also details the timeline for all CDBG related documents and activities for public viewing and input. Public meetings/hearings were posted on the Town website and/or advertised in the local papers well in advance to ensure that accommodations could be made for non-English speaking persons and persons with disabilities. A draft copy of the 2021 Annual Action Plan was posted on the Town website and made available for review and comment. Due to the ongoing COVID-19 outbreak and closure/limited access to most physical, in-person locations, online outreach and availability was the best way to allow for review of the 2021 Annual Action Plan.

The Community Development Office worked with the CDAC members in reviewing and selecting the proposed activities as submitted by potential grantees. There were a total of 36 activities submitted for consideration. In order to thoroughly and carefully review these activities, the CDAC established subcommittees for each. Subcommittees were tasked to perform site visits (in-person or remote depending on COVID restrictions and safety/comfort of participants) and report the findings to the full membership. The full committee decided to allocate PY2021 CDBG funding to 30 unique activities (19 public service programs and 11 capital improvement/housing projects).

PR-05 Lead & Responsible Agencies – 91.200(b)

1. Agency/entity responsible for preparing/administering the Consolidated Plan

Describe the agency/entity responsible for preparing the Consolidated Plan and those responsible for administration of each grant program and funding source.

Agency Role	Name	Department/Agency

Table 1 – Responsible Agencies

Narrative (optional)

The Community Development (CD) Office of the Town of Greenwich serves as the lead agency for the administration of all CDBG funded activities. As the lead agency, the CD Office is responsible for the management and implementation of the Town’s 2021 Annual Action Plan and related documents, as well as compliance with CDBG-related requirements set forth by HUD. The CD Office manages the process of identifying a wide range of housing and community development activities to support the improvement of community facilities as well as for the provision of programs and services that are carried out by local subrecipients (nonprofit agencies/community partners). The CDBG Program is designed to leverage federal dollars with local, state and/or private funds. The Community Development Administrator works with Community Development Advisory Committee (CDAC) members throughout the allocation process to identify and select eligible activities for CDBG funding. The CD Office also ensures that all comments, suggestions and input from the public are incorporated in the process and are included in the Annual Action Plan. The proposed programs and projects are contracted out to nonprofit agencies with the awarding of a CDBG grant. In addition to nonprofit agencies, the Town’s Department of Human Services, Department of Health, Department of Parks and Recreation and the Housing Authority of the Town of Greenwich provide services to low- and moderate-income residents of Greenwich.

Consolidated Plan Public Contact Information

Any questions or comments regarding the Town of Greenwich 2020-2025 Consolidated Plan for Community Development, or any of its associated Annual Action Plans, should be directed to:

Tyler Fairbairn, Community Development Administrator

101 Field Point Road, Community Development Office

Greenwich, CT 06830

Phone: (203) 622-3791

Email: tyler.fairbairn@greenwichct.org

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AP-10 Consultation – 91.100, 91.200(b), 91.215(I)

1. Introduction

The Annual Action Plan was developed in conjunction with the 2020-2024 Consolidated Plan. There was collaboration among several Town departments and agencies, as well as numerous local and regional nonprofit agencies that provide programs and services to low- and moderate-income Greenwich residents. The CD Office consulted with public and private agencies and organizations whose programs and services fall under the following categories: health services, social services, mental health services, homeless services, transportation services, housing services, elderly services, child care services, youth services, food services, legal services, employment services, domestic abuse services and services for persons with disabilities.

Provide a concise summary of the jurisdiction’s activities to enhance coordination between public and assisted housing providers and private and governmental health, mental health and service agencies (91.215(I))

The Town collaborates with various public and private housing, health and social service agencies and organizations whose programs benefit low- and moderate-income Greenwich residents. The planned activities under the 2021 Annual Action Plan will be carried out by various community and area service providers. It is therefore important for the Town to establish a strong working relationship with its partner agencies.

In order to improve the coordination and cooperation between public and private housing, health and social service agencies, the Town will continue to include representatives from the Board of Health, Board of Human Services and First Selectman’s Advisory Committee for People with Disabilities as members of the Community Development Advisory Committee. The CDAC is an important component of the Community Development Block Grant Program and the Citizen Participation Plan, and allows for those who best know the needs of the Town’s most vulnerable residents to guide the direction of the Annual Action Plan.

Describe coordination with the Continuum of Care and efforts to address the needs of homeless persons (particularly chronically homeless individuals and families, families with children, veterans, and unaccompanied youth) and persons at risk of homelessness.

The Town is a member of the Greater Stamford/Greenwich Continuum of Care (CoC). This enables Greenwich to work with area and regional agencies that provide homeless services and set the planning agenda to address the needs of homeless persons. The Town supports the Continuum of Care application and Point-In-Time census surveys of the area/regional agencies.

Some of the root causes of homelessness are: poverty; difficulties in engaging the population especially individuals with mental health or substance abuse histories; lack of appropriate supportive and permanent housing; poor discharge planning from public and private systems; inaccessibility of mainstream resources, particularly mental health and substance abuse services; investment in stop gap measures rather than permanent solutions; expensive housing market; and lack of employment opportunities.

The CD Administrator participates in regular meetings of Stamford-Greenwich Housing First – a bimonthly gathering of area service providers for those who are homeless or at risk of homelessness. The 2021 also includes a first-time award to Opening Doors Fairfield County, whose mission is to prevent and end homelessness in Fairfield County.

Describe consultation with the Continuum(s) of Care that serves the jurisdiction's area in determining how to allocate ESG funds, develop performance standards for and evaluate outcomes of projects and activities assisted by ESG funds, and develop funding, policies and procedures for the operation and administration of HMIS

Given that there are no homeless shelters (emergency, transitional & supportive housing) for adult men and women in Greenwich, the Town supports area and regional homeless shelters that serve Greenwich residents. The Town will continue to work with regional shelters and service providers to address the issue of homelessness and homelessness prevention by encouraging and funding supportive services to help those at risk of becoming homeless and those who are without shelter. The Town will allocate CDBG funds to regional shelters and service providers to assist Greenwich residents who are homeless or at-risk of becoming homelessness. Regional homeless shelters must document that they serve Greenwich residents. To the extent feasible, CDBG funds will be provided to agencies that provide services and programs, which address the needs of those who are not homeless but are at imminent risk of becoming homeless.

2. Describe Agencies, groups, organizations and others who participated in the process and describe the jurisdiction's consultations with housing, social service agencies and other entities

Table 2 – Agencies, groups, organizations who participated

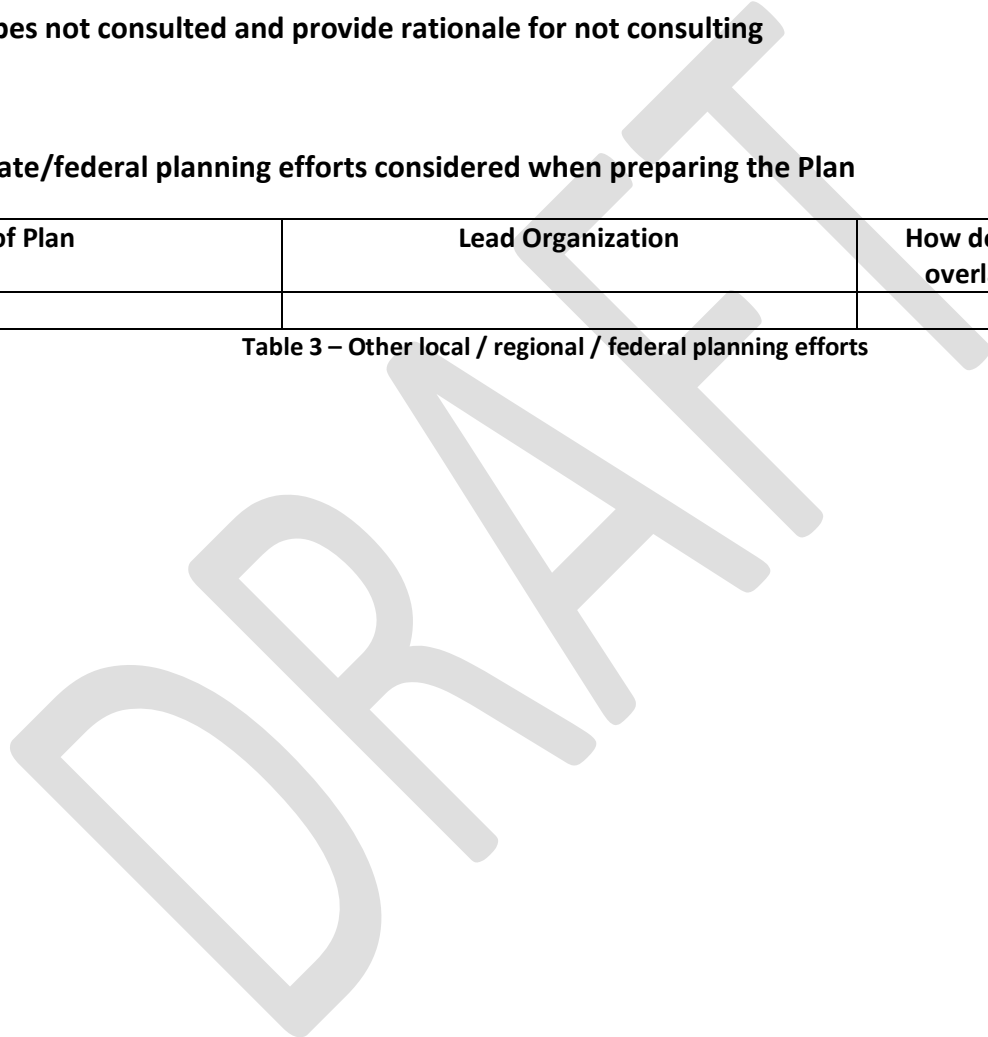
Identify any Agency Types not consulted and provide rationale for not consulting

Other local/regional/state/federal planning efforts considered when preparing the Plan

Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?

Table 3 – Other local / regional / federal planning efforts

Narrative (optional)



AP-12 Participation – 91.105, 91.200(c)

1. Summary of citizen participation process/Efforts made to broaden citizen participation Summarize citizen participation process and how it impacted goal-setting

The CD Office works with the CDAC to identify the activities (program services, rehabilitation projects and acquisition projects) that will be recommended to receive CDBG funding. CDAC held three meetings and one public hearing during the 2021 AAP process.

CDAC members also conducted on-site visits in order to properly evaluate the proposed activities and recommend those that meet the needs of the community. CDAC members consist of representatives from:

- Each of the twelve districts of the Representative Town Meeting (represents the community as a whole)
- Board of Estimate and Taxation (represents the community as a whole)
- Board of Human Services (represents clients who are mostly low- and moderate-income residents including minorities, non-English speaking persons as well as persons with disabilities)
- First Selectman’s Advisory Committee for People with Disabilities
- Board of Health (represents the community as a whole)
- Planning and Zoning Commission (represents local organizations including businesses and developers)
- NOW – Greenwich Chapter (represents minorities)
- League of Women Voters
- Housing Authority of the Town of Greenwich

Maximum citizen participation is manifested and accomplished through the composition of the CDAC. The CDAC is an advisory committee to the First Selectman. The main purpose of the CDAC is to provide maximum citizen input as reflected in the membership, with representatives from various Town segments such as neighborhood districts (all twelve), Town Boards and Commissions, agencies, organizations and associations.

The citizen participation calendar gets posted on the Town website to ensure that the public was made aware of the scheduled public hearings and meetings. The citizen participation calendar details the timeline for all CDBG related documents and activities for public viewing and input. Finally, announcements for the public hearings and meetings were posted on the Town website and/or advertised in the local papers.

The Town utilized several different modes of communication, in order to provide the citizens with an adequate amount of time to review and submit comments on the 2021 Annual Action Plan. The notices for the public meetings, public hearings, and notifications for the comment period on the 2021 AAP were posted on the Town’s website. Citizens were provided with more than 30 days to submit comments to the Community Development Office.

The details of the citizen participation outreach can be found under Attachment #1 Citizen Participation Documents.

Citizen Participation Outreach

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (if applicable)

Table 4 – Citizen Participation Outreach

Expected Resources

AP-15 Expected Resources – 91.220(c)(1,2)

Introduction

The Town of Greenwich is currently qualified only for the CDBG formula program. As such, 2021 CDBG entitlement funds received will be fully utilized to address the needs of the low- and moderate-income persons and households. However, nonprofit agencies supported by CDBG funds will also apply for other federal, state and/or local funds (public and private) such as Housing Choice Vouchers (Section 8) funds, Low-Income Public Housing funds, Emergency Shelter Grants, Supportive Housing Program funds (HUD), United Way funds, Head Start funds, private donations/contributions from corporations and individuals.

Anticipated Resources

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		

Table 5 - Expected Resources – Priority Table

Explain how federal funds will leverage those additional resources (private, state and local funds), including a description of how matching requirements will be satisfied

In addition to CDBG entitlement and program income funds, the Town will continue to seek other sources for funding to be made available and allocated to local and area agencies that provide services which specifically address the identified needs of the target population. Also, the allocation of funds for assisted/affordable housing will be based on a balance of need, realistic expectations of proposed accomplishments,

available resources, including affordable sites and other available financing in sufficient amounts to produce housing that will be affordable to low- and moderate-income individuals and households. There are also other federal and state funds that non-profit agencies and organizations may qualify for. The CD Office will work with agencies and organizations that present eligible proposals under such funding programs.

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If appropriate, describe publically owned land or property located within the jurisdiction that may be used to address the needs identified in the plan

The Town of Greenwich Department of Human Services was awarded funding in PY2021 for its BANC After School Program, the goal of which is to provide assistance to low- and moderate-income Greenwich Public School families participating in after school care/learning enrichment.

Discussion

The continued reduction of funding availability is the greatest obstacle in meeting the needs of low- and moderate-income persons and households in the Town of Greenwich. The CD Office will continue to encourage local community agencies to pursue other public and private funds and to research other mechanisms that may be used to assist targeted populations to obtain decent housing, a suitable living environment and expanded economic opportunities.

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Annual Goals and Objectives

AP-20 Annual Goals and Objectives

Goals Summary Information

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator

Table 6 – Goals Summary

Goal Descriptions

Projects

AP-35 Projects – 91.220(d)

Introduction

The Town of Greenwich Program Year 2021 Annual Action Plan (AAP) is the second installment of the 2020-2024 Five-Year Consolidated Plan. The 2021 AAP identifies the activities to be funded during Program Year 2021 that provide opportunities and services primarily benefitting low- and moderate-income individuals and households. The complete list of the proposed activities recommended for 2021 CDBG funding may be found in the First Selectman's funding recommendations for CDBG Program Year 2021. For a detailed summary on each proposed activity, refer to the project summary information section.

Greenwich continues to incorporate an outcome performance measurement system to be used as a basis in evaluating the success and effectiveness of the CDBG funded activities. The objectives listed below will be used as a guide for the activities to be funded during PY2021:

- To provide a suitable living environment
- To provide decent housing
- To expand economic opportunities

The anticipated outcomes for PY2021 are the availability, accessibility and affordability of activities that improve the daily living environment by making services, infrastructure, public services, public facilities, housing and/or shelter available or accessible to low- and moderate-income people, including persons with disabilities.

The Town's overall goal is to improve the health and wellbeing of its residents through the provision of programs and services that contribute to a safer and stronger community. For PY2021, the Town of Greenwich will use CDBG entitlement funds for the purpose of accomplishing the following goals:

- Continue to allocate CDBG funds to activities that meet the national objective of benefiting low/moderate-income persons.
- Continue to meet the overall expenditures level requirement, which specifically states that at least 70% of all CDBG funds of the aggregate federal assistance provided should be used for activities that benefit low/moderate-income persons.
- Continue to meet the timeliness standard requirement under 24 CFR 570.902.

To ensure that the proposed programs are being carried out in accordance with HUD and local regulations, and that the CDBG funds are expended in accordance with the standards established by HUD, CD staff will monitor the progress of all activities on a continuing basis. CD staff will perform site visits (in person or remotely, as dictated by COVID-19 restrictions) to ensure that funded agencies have

administrative procedures and policies that are in conformance with HUD regulations.

Projects

#	Project Name

Table 7 - Project Information

Describe the reasons for allocation priorities and any obstacles to addressing underserved needs

The Town, the CDAC and the First Selectman make an annual effort to provide funding to as many applicants as possible. Proposed activities are evaluated for HUD eligibility as well as the potential to serve a wide array of need for Greenwich’s most vulnerable residents. Every applicant in PY2021 was awarded some funding to meet the needs of, among other priority populations, children, the elderly, persons with mental and physical disabilities, victims of domestic abuse, the homeless/those at risk of homelessness and residents of public housing.

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AP-38 Project Summary
Project Summary Information

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AP-50 Geographic Distribution – 91.220(f)

Description of the geographic areas of the entitlement (including areas of low-income and minority concentration) where assistance will be directed

Funding allocations for Program Year 2021 and priorities assigned for each activity are based on citizen input during the Community Development Advisory Committee’s process as well as the First Selectman’s authority during Plan development with careful consideration of the priorities proposed in the Five-Year Consolidated Plan. The proposed activities are available to low- and moderate-income residents with most programs and services located within the low- and moderate-income sections of Town. The Project Map shows the location of the proposed activities. There is no specific single area of geographic focus in allocating the CDBG funds, rather the CDBG allocation is focused on activities that are accessible and available to the targeted vulnerable populations. Certain services not provided within the Town of Greenwich, but that are offered to income-eligible Greenwich residents, are located in Stamford. Beneficiary reporting for these activities includes the number of Greenwich residents served.

Geographic Distribution

Target Area	Percentage of Funds

Table 8 - Geographic Distribution

Rationale for the priorities for allocating investments geographically

In general, the allocation of CDBG funds was based on the following criteria:

- Whether the proposed activity meets the requirements established under the funding priority analysis and strategies;
- Whether the proposed activity is included within the lists of eligible activities under the CDBG statute; and
- Whether the proposed activity meets one of the three CDBG national objectives.

The Town did not specifically identify target areas, but considers accessibility in making funding recommendations.

Discussion

There is no specific single geographic area of focus in allocating CDBG funds. Most of the neighborhoods within the Town of Greenwich are comprised of mixed-income households. Therefore, the low- and moderate-income residents (target residents) do not populate a geographic area that is easily tracked (such as a census tract or a particular neighborhood). Thus, the allocation of CDBG funds focused on the activities that are accessible and available to the target residents. As the Town of Greenwich is a CDBG

exception community, certain activities were given area benefit consideration that aligned with census tracts meeting low-/mod-income criteria as defined by HUD.

Affordable Housing

AP-55 Affordable Housing – 91.220(g)

Introduction

Priorities and Objectives:

Among the objectives of the Community Development activities for PY2021 is to provide decent housing principally for low- and moderate-income persons. To accomplish this objective, the CD Office will work to extend and strengthen partnerships among all levels of government and the private sector, including for-profit and nonprofit organizations, in the production and preservation of decent, safe and affordable housing.

The CD Office, in its effort to promote the development and maintenance of decent, safe housing affordable to target income households as well as those with special needs, has set the following goals and objectives for PY2021:

- Assist in the development and provision of housing for target income households and special needs groups.
- Support and assist in the conservation and improvement of existing affordable housing stock.
- Promote equal housing opportunities.
- Preserve existing affordable housing developments for target income households with the use of various resources, programs and policies.
- Assist in the conservation and affordability of assisted housing through rehabilitation for energy conservation and continued life of the buildings.

To achieve the goals and priorities listed above, the following actions will be taken during PY2021:

- CDBG funds will be allocated to Abilis, Inc. to make renovations to its 101 Orchard Street residence housing six individuals with cognitive/physical disabilities.
- CDBG funds will be allocated to Abilis, Inc. to make renovations to its 45 Pemberwick Road residence housing six individuals with cognitive/physical disabilities.
- CDBG funds will be allocated to Greenwich Communities (formerly the Greenwich Housing Authority) for window renovation at Agnes Morley Heights to improve the quality of life of the families who reside at this public housing development.
- CDBG funds will be allocated to Inspirica to support the Gilead House Boiler Replacement Project, which serves as transitional housing for adults living with chronic mental illness.
- The CDBG office will continue to work with local housing developers (public and private) to promote the inclusion of affordable/moderate-income dwelling units.

The CD Office will monitor and report any progress related to the recommendations issued by the Annual Action Plan

Community Development Advisory Committee with regards to affordable housing developments. The progress report will be included in the 2021 CAPER. For Program Year 2021 the Town did not allocate CDBG funds to any activities that promote homeownership.

One Year Goals for the Number of Households to be Supported
Homeless
Non-Homeless
Special-Needs
Total

Table 9 - One Year Goals for Affordable Housing by Support Requirement

One Year Goals for the Number of Households Supported Through
Rental Assistance
The Production of New Units
Rehab of Existing Units
Acquisition of Existing Units
Total

Table 10 - One Year Goals for Affordable Housing by Support Type

Discussion

The Town of Greenwich will use CDBG funds to support the following housing-related projects in PY2021:

- Inspirica – Gilead House Boiler Replacement. Apartment building housing sixteen adults living with chronic mental illness.
- Housing Authority of the Town of Greenwich – Agnes Morley Heights Window Replacement Project at a public housing residence serving 150 elderly residents.
- Abilis – 101 Orchard Street Renovation. Group home housing six individuals.
- Abilis – 45 Pemberwick Road Renovation. Group home housing six individuals.

AP-60 Public Housing – 91.220(h)

Introduction

Actions planned during the next year to address the needs to public housing

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

If the PHA is designated as troubled, describe the manner in which financial assistance will be provided or other assistance

Discussion

AP-65 Homeless and Other Special Needs Activities – 91.220(i)

Introduction

The 2019 Connecticut Coalition to End Homelessness Point in Time Count did not identify any unsheltered families in Greenwich. While this points to a positive outcome resulting from the work of Opening Doors Fairfield County and local service providers, the Town is certainly aware that families (and individuals) are at risk of becoming homeless any time due to factors beyond their control (loss of employment, domestic violence in the home, medical emergency, etc.) Gaps in services and housing tend to be a result of the following: limited or inadequate funding resources, difficulties in engaging the target population, limited or inadequate supportive and permanent housing, poor discharge planning from public and private systems, and inaccessibility of resources (particularly mental health and substance abuse services).

In order to properly address the identified gaps in the delivery of housing and program services to the homeless population, the Town will continue to work with the agencies and organizations whose activities directly benefit the homeless population. The Town will also work with these agencies in order to develop and implement a strategic plan that will reduce the gaps as identified above.

The Town will continue to work and support area and regional agencies that address the needs of the homeless population. Some of these agencies include but are not limited to: Inspirica, Kids in Crisis and Pacific House.

To ensure that emergency and transitional housing needs of homeless persons are accurately identified and properly addressed, the Community Development Office will collaborate with the homeless program service and housing providers to develop a short-term and a long-term plan including capital improvements and projects. This plan shall establish the actions to be taken to ensure that support and assistance are provided to those who are transitioning from emergency shelters to permanent and independent housing.

Accomplishments and outcomes are reported with the submission of the CAPER. Supporting programs and services for the benefit of the homeless population continues to be a high priority.

Describe the jurisdictions one-year goals and actions for reducing and ending homelessness including

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

In order to successfully reach out to the homeless population and be completely aware of their needs, the Town will work with homeless program service and housing providers to conduct a needs

assessment survey to ensure that their needs are being properly addressed.

The Town will continue to work and support area and regional agencies that address the needs of the homeless population. Some of these agencies include but are not limited to: Inspirica; Kids in Crisis; Liberation Programs; and Pacific House, Inc. Additionally, the Town of Greenwich Department of Human Services works with clients/residents who may be homeless or at risk of homelessness, and is staffed with case workers trained to provide services necessary, or direct clients to services necessary, to prevent homelessness.

To ensure that emergency and transitional housing needs of homeless persons are accurately identified and properly addressed, the CD Office will collaborate with homeless program service and housing providers to develop a short-term and a long-term plan that includes capital improvements and other projects. This plan shall establish the actions to be taken to ensure that support and assistance are provided to those who are transitioning from emergency shelters to permanent and independent housing.

Addressing the emergency shelter and transitional housing needs of homeless persons

Gaps in services and housing tend to be a result of the following: limited or inadequate funding resources, difficulties in engaging the target population, limited or inadequate supportive and permanent housing, poor discharge planning from public and private systems, and inaccessibility of resources (particularly mental health and substance abuse services).

In order to properly address the identified gaps in the delivery of housing and program services to the homeless population, the Town will continue to work with the agencies and organizations whose activities directly benefit the homeless population. The Town will also work with these agencies in order to develop and implement a strategic plan that will reduce the gaps identified above.

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 Town will continue to participate in any regional homelessness plan and provide available support to address findings. Some of the root causes of homelessness are: poverty; difficulties in engaging the population especially individuals with mental health or substance abuse histories; lack of appropriate supportive and permanent housing; poor discharge planning from public and private systems; inaccessibility of mainstream resources, particularly mental health and substance abuse services; investment in stop-gap measures rather than permanent solutions; expensive housing market; and lack

of employment opportunities. In an effort to address some of the issues stated above, CDBG funds will be provided to the following activities: Family Centers RITE program; Food Bank of Lower Fairfield County program; Kids in Crisis Nursery Emergency/Crisis Services; Meals on Wheels Food Service program; Pacific House Emergency Food Service program; Pacific House Emergency Meals Program and Shelter Locker Program. The Town has also funded, for the first time, Opening Doors Fairfield County in an effort to support their eviction prevention work in Greenwich.

Helping low-income individuals and families avoid becoming homeless, especially extremely low-income individuals and families and those who are: 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); or, receiving assistance from public or private agencies that address housing, health, social services, employment, education, or youth needs.

The Town supports local and regional shelters and housing providers with their development and implementation (to the extent possible and where appropriate) of policies and protocols for the discharge of persons from publicly funded institutions or systems of care in order to prevent such discharge from immediately resulting in homelessness for such persons. All residents are assisted in locating permanent housing or other long-term residential settings such as substance abuse treatment or supervised housing for persons with psychiatric disabilities. CDBG-funded agencies providing housing (emergency, permanent, transitional and supportive) are required to supply a copy of their discharge policies and procedures.

In PY2021 the Town has funded, for the first time, Opening Doors Fairfield County in an effort to support their eviction prevention work in Greenwich. This funding, combined with CARES Act funding provided to the Town of Greenwich Department of Human Services during PY2020, will help to keep low-income families from slipping into homelessness through rental assistance and case management.

Discussion

To achieve the goal of eliminating chronic homelessness, the Town will provide support and work actively with agencies that provide supportive services and shelters to the homeless population. In addition, the Town will provide support to agencies that provide direct assistance (i.e. food, transportation, child care, job training, etc.) to individuals who are at risk of becoming homeless. Further, the CD Office supports and will participate in any regional planning efforts that agencies carry out in an attempt to end homelessness and chronic homelessness. The Town will continue to work with, support and provide funding to local and regional shelters and supportive service providers to meet the goal of eliminating chronic homelessness as well as meet the needs of those experiencing homelessness locally.

AP-75 Barriers to affordable housing – 91.220(j)

Introduction:

There are a number of constraints to the development of affordable housing in Connecticut, Fairfield County and the Town of Greenwich specifically. Some of the barriers to affordable housing include: availability of affordable sites, development/design standards, development costs, availability of funding sources for affordable housing, local zoning restrictions, lack of community awareness, neighborhood opposition and HUD's prohibition against using CDBG funding for the construction of new housing.

Actions it planned 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 State of Connecticut has high housing and living costs when compared to the rest of the country; Fairfield County has high housing costs when compared to the State of Connecticut and the Town of Greenwich has high housing costs when compared to much of Fairfield County. In its updated 2019 Plan of Conservation and Development, the Town of Greenwich has identified structural/policy changes intended to remove barriers to affordable housing including:

- Updating Building Zone Regulations to promote affordable housing through inclusionary zoning;
- Working with the Housing Authority of the Town of Greenwich to develop affordable housing on their property as well as Town-owned land;
- Updating Townhouse, Neighborhood and Residential-Planning Housing Design-Small Unit Zone requirements to increase subsidized housing;
- Updating elderly and affordable accessory housing requirements in the Building Zone Regulations; and
- Identifying illegal apartments and converting them to legal, deed-restricted units to be added to the Town's inventory maintained by the state.

In addition to such identified policy changes, through its 2020 Analysis of Impediments to Fair Housing Choice assessment, the Town also established the following goal to deter the negative effects of public policies on fair and affordable housing:

- Increase community awareness of fair housing laws and means of recourse if residents encounter housing discrimination.
- Increase the supply of affordable housing in the Town to provide greater access to housing for low- and moderate-income households.
- Establish a fair housing point of contact within Town Hall to manage, coordinate, and support fair housing efforts and complaints received.

Discussion:

AP-85 Other Actions – 91.220(k)

Introduction:

Lead Agency

The Community Development (CD) Office of the Town of Greenwich serves as the lead agency for the administration of all CDBG-funded activities. As the lead agency, the CD Office is responsible for the management and implementation of the Town's 2021 Annual Action Plan and related documents. The CD Office is also responsible for taking the necessary actions to meet all CDBG-related requirements set forth by HUD to ensure that the Town is in compliance with all the rules and regulations of the program. The CD Office manages the process of identifying and selecting a wide range of housing and community development activities to support the improvement of community facilities, as well as the provision of programs and services that are carried out by subrecipients (nonprofit agencies).

The CDBG Program is designed to leverage federal funding with local, state and/or private funds. The Community Development Administrator works with the Community Development Advisory Committee (CDAC) members during the initial process of identifying and selecting eligible activities for CDBG funding allocation. The CD Office also ensures that all comments, suggestions and input from the public are incorporated in the process and are included in the Annual Action Plan. The proposed programs and projects are contracted out to non-profit agencies through the awarding of a CDBG grant. In addition to the nonprofit agencies, the Town's Department of Human Services, Department of Health, Department of Parks and Recreation and the Housing Authority are governmental agencies that also provide services to the low- and moderate-income residents of Greenwich.

Plan Development

The 2021 Annual Action Plan reflects and identifies the needs of low- and moderate-income Greenwich residents, and links the identified needs to available federal, state and local resources. The 2021 Annual Action Plan was developed with comments, suggestions, assistance, input and advice of citizens, agencies (both public and private) and the CDAC. Development of the 2021 Annual Action Plan included the following:

- A public hearing was held prior to the beginning of the planning process to identify housing and community development needs;
- A period was set aside in accordance with the recently updated Citizen Participation Plan for various nonprofit agencies to submit requests for CDBG funding during Program Year 2021;
- Evaluation of all proposed activities requesting Program Year 2021 CDBG funds;
- Several public meetings and a public hearing were held by the Advisory Committee to ensure maximum citizen participation and input;
- On-site and virtual visits by the Advisory Committee members to assess proposals;
- A public hearing was held by the First Selectman prior to the issuance of the final funding

recommendation;

- A draft copy of the proposed 2021 Annual Action Plan was made available to the general public via web to solicit citizen participation and input; and
- Approval was obtained from the Town's finance Board (BET) and legislative body (RTM) to submit the 2021 Annual Action Plan for HUD consideration.

Actions planned to address obstacles to meeting underserved needs

The greatest obstacle to meeting the needs of low- and moderate-income persons and households is the reduction of available funds. The CD Office will continue to encourage local community agencies to pursue other public and private funds and to research other mechanisms that may be used to assist target individuals and households to obtain decent housing, a suitable living environment and expanded economic opportunities. The CD Office will also work with the Town in preparing and submitting applications for funding from other sources (i.e. state funds, federal funds, etc.)

Actions planned to foster and maintain affordable housing

The anticipated CDBG entitlement funding from HUD will be allocated to local and area agencies whose programs and services specifically address the housing needs identified in the 2020-2024 Consolidated Plan. The allocation of funds for assisted/affordable housing was based on a balance of need, realistic expectations of proposed accomplishments, available resources, including affordable sites, and other available financing in sufficient amounts to produce housing that will be affordable to low- and moderate-income individuals and households.

CDBG funds allocated to rehabilitation and acquisition activities during Program Year 2021 will be devoted to rehabilitation and enhancement or improvements of existing affordable housing including public housing units available to target individuals and households.

Actions planned to reduce lead-based paint hazards

The CD Office will require any residential activity (rehabilitation or program services) of pre-1978 residential structures funded in part or in whole with CDBG funds to be tested for lead-based paint hazards. Should the test show positive for lead, the subrecipient must ensure that lead is abated in accordance with the regulations of the Environmental Protection Agency and in compliance with the Residential Lead Based Paint Hazard Reduction Act of 1992 (Title X) and subsequent changes.

The process shall include notification, identification and treatment as necessary. In addition, the CD Office will continue to require that rehabilitation activities include lead-based paint identification and abatement prior to releasing CDBG funds for the activity.

The Greenwich Health Department will continue to work towards eliminating elevated blood lead levels

in children under the age of six by screening children who are most likely to be affected. Their approach includes the following: 1) offering (free of charge) blood lead testing to all eligible children who reside in rental units built before 1978 who may have been exposed to any building renovations or through other sources that may have exposed them to lead paint; and 2) the testing will be offered through various programs such as the WIC Clinic, the Family Health Well Child Clinic, Head Start programs and to children who attend any of the 40 daycare centers within the Town.

The CD Office will continue to consult with housing providers for low-income individuals and households (such as HATG, Pathways, Abilis, etc.) with regards to lead-based paint evaluation, identification and abatement. The Town will also continue to support the School Health examination program of the Board of Education, which screens children for anemia and lead exposure. They will also perform periodic sampling surveys that are conducted in general areas of environmental concern as well as specific clinical testing. As far as individual housing units, they will continue to respond to individual tenant complaints and/or request.

Actions planned to reduce the number of poverty-level families

The Town's anti-poverty strategy includes attracting a range of businesses and providing workforce development and job-training services for low-income residents. In addition, the Town's strategy is to provide supportive services for target income residents, such as childcare services and counselling.

In an effort to reduce the number of individuals and households living at or below the poverty level, the Town will focus on offering programs and activities that support job training, childcare (before/after school, daycare, early education) and basic human needs services. Planned economic development and anti-poverty programs include:

- Job training services;
- Services that improve skills and address barriers to employment;
- Childcare centers and services;
- Support family self-sufficiency programs; and
- Programs run by agencies and organizations aimed at enhancing the financial status of low- and moderate-income residents.

These services are especially vital to the low- and moderate-income individuals and households with children and seniors on limited income. By providing assistance that offers basic services, the target

population can focus on improving their family's financial stability.

During Program Year 2021, CDBG funds will be provided to the following public service activities:

- Boys & Girls Club of Greenwich – Friday Night Teen Program
- Community Health Center, Inc. – Senior Dental Assistance Program
- Family Centers – RITE (Reaching Independence Through Employment) Program
- Food Bank of Lower Fairfield County – Food Bank Program
- Inspirica – Women's Housing Program Case Manager
- Jewish Family Services – Supermarketing for Seniors Program
- Kids in Crisis – Safe Haven for Kids
- Meals on Wheels of Greenwich – Food Service Program
- Old Greenwich Riverside Community Center – Scholarship for Childcare Program
- Opening Doors Fairfield County – Eviction Prevention Program
- Pacific House, Inc. – Emergency Meals Program
- Town of Greenwich Department of Human Services – BANC After School Program

Actions planned to develop institutional structure

The Town works in partnership with private nonprofit organizations and other public institutions in carrying out the activities proposed in the Annual Action Plan. The Town evaluates each activity as well as the agencies and organizations carrying them out in order to properly assess the strengths and gaps in the delivery system. Effective implementation of the strategies and goals stated in the 2021 Annual Action Plan requires the participation, involvement and support of various local community and area agencies. Coordinated efforts among local and area agencies are necessary to ensure that the community needs are addressed. Some needs are met on a regional basis, therefore CDBG funds are provided to regional agencies if warranted (where the needs of local residents are documented and are being met by such programs). The CD Office also works with and provides recommendations and assistance to private agencies, nonprofit agencies, neighborhood associations and faith-based organizations.

The partnerships between the Town and nonprofit service providers (local, area and regional) allow for the effective delivery of the needed and vital program services to the target population/group to the extent feasible. These partnerships proved to strengthen the delivery of programs and services. In addition, any gaps that have been identified are addressed through the use of local Town funds (department services) or local service providers. Finally, area and regional service providers are also supported to address the needs of the target population if the services required are not available locally (for instance, homeless shelters).

To improve institutional structures and enhance the coordination between the Town and housing and human service agencies/organizations, the CD Administrator will continue to support other local

planning agencies. In addition, the CD Administrator will continue to participate in various committee meetings that address the priority issues identified in the 2021 Annual Action Plan and participate in professional organizations aimed at advocacy and professional development in the housing and community development fields.

The CD Office will continue to seek representatives from: 1) various local community agencies (private and nonprofit); 2) neighborhood associations; 3) community and faith-based organizations; and 4) public institutions to be part of the advisory committee to the CDBG Program. To enhance the coordination and ensure participation, at least one representative from the Housing Authority of the Town of Greenwich, RTM (Representative Town Meeting) districts, League of Women Voters, Planning and Zoning Commission, Board of Human Services, Board of Health and the BET (Board of Estimate and Taxation) and First Selectman's Advisory Committee for People with Disabilities will also be requested.

Actions planned to enhance coordination between public and private housing and social service agencies

Coordination and cooperation among public/private housing, health and social service agencies is accomplished through the composition of the Community Development Advisory Committee (CDAC), which includes representatives from the Housing Authority, Board of Health, Board of Human Services, Planning and Zoning Commission, League of Women's Voters and other relevant groups. To enhance the coordination and maintain relationships with public and private agencies, the CD Office contacted local area housing, health and social service agencies to participate during the development of the 2021 Annual Action Plan. The open and transparent annual allocation process allows both providers and members of the public to see what activities have been proposed for funding in order to identify gaps in service and/or possible duplication.

Discussion:

Program Specific Requirements

AP-90 Program Specific Requirements – 91.220(I)(1,2,4)

Introduction:

During Program Year 2021 the Town of Greenwich proposes to fund 31 activities (nineteen Public Service, eleven Housing/Public Facilities, one Planning/Administration) through its CDBG allocation totaling \$811,384.86. The breakdown for the budget is as follows:

- \$796,815 – anticipated 2020 CDBG funding
- \$14,569.86 – reprogrammed funds (from previously funded activities inclusive of balances from: the 2016 Boys & Girls Club security project; the 2016 Housing Authority of the Town of Greenwich McKinney Terrace housing project; the 2016 River House exterior repair project; the 2017 Boys & Girls Club security project; the 2017 Family Centers playground project; the 2019 Senior Dental Program; the 2019 Parsonage Cottage flooring project; and the 2019 Abilis kitchen renovation project).

Timely Completion Procedure

Public Service Activities:

The proposed CDBG funding to be allocated to the nineteen Public Service activities represents a small percentage of the total cost to run each of the program/service activities. Therefore, there is no potential timeliness expenditure issue related to the public service activities.

Rehabilitation/Improvement Activities:

The CD Office has updated the Subrecipient Agreement for all rehabilitation/capital improvement activities to add language specifically stating a timeliness expenditure goal or a requirement to allow for the Town to cancel the CDBG funding if the proposed project/activity does not start within one year from the date that the Agreement has been executed, at the Town's discretion. The CD Office has incorporated language into its CDBG applications indicating that ability to deliver projects in a timely manner, including an applicant's outstanding prior-year CDBG funds, will be a consideration when CDAC is identifying projects to recommend for funding.

Program Income:

Any program income to be received during Program Year 2021 will be allocated to activities with

programs and services that benefit low- and moderate-income persons.

Contributions – Other Town Funds:

Represents the costs of employee benefits (fringe benefits) for CD Office staff. Employee/fringe benefits include but are not limited to:

- FICA
- Medicare
- Pension
- Health Insurance Coverage
- Life Insurance Coverage
- Worker’s Compensation
- OPEB (Other Post-Employment Benefits)

**Community Development Block Grant Program (CDBG)
Reference 24 CFR 91.220(l)(1)**

Projects planned with all CDBG funds expected to be available during the year are identified in the Projects Table. The following identifies program income that is available for use that is included in projects to be carried out.

1. The total amount of program income that will have been received before the start of the next program year and that has not yet been reprogrammed
 2. The amount of proceeds from section 108 loan guarantees that will be used during the year to address the priority needs and specific objectives identified in the grantee's strategic plan
 3. The amount of surplus funds from urban renewal settlements
 4. The amount of any grant funds returned to the line of credit for which the planned use has not been included in a prior statement or plan.
 5. The amount of income from float-funded activities
- Total Program Income

Other CDBG Requirements

1. The amount of urgent need activities