

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.

CDBG: The City of Cleveland received Community Development Block Grant funding in the amount of \$383,338 for Program Year 2019. The Consolidated Annual Performance Evaluation Report (CAPER) is for the period of July 1, 2019 through June 30, 2020 and is the first report for the City of Cleveland's Five-Year Consolidated Planning period of 2019-2023. The projects proposed in the 2019 Action Plan were adhered to during 2019-2020 and were directly related to the priorities set forth in the Consolidated Plan/Action Plan. **For a more complete summary of activities and expenditures see Attachment 1.**

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
Administration	Affordable Housing Public Housing Homeless Non-Homeless Special Needs Non-Housing Community Development	CDBG: \$	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	Persons Assisted	1500	3320	221.33%			
Administration	Affordable Housing Public Housing Homeless Non-Homeless Special Needs Non-Housing Community Development	CDBG: \$	Public Facility or Infrastructure Activities for Low/Moderate Income Housing Benefit	Households Assisted	15	0	0.00%			

Administration	Affordable Housing Public Housing Homeless Non-Homeless Special Needs Non-Housing Community Development	CDBG: \$	Housing Code Enforcement/Foreclosed Property Care	Household Housing Unit	800	473	59.13%			
Affordable Housing	Affordable Housing	CDBG: \$	Rental units constructed	Household Housing Unit	25	0	0.00%			
Affordable Housing	Affordable Housing	CDBG: \$	Rental units rehabilitated	Household Housing Unit	25	0	0.00%			
Affordable Housing	Affordable Housing	CDBG: \$	Homeowner Housing Added	Household Housing Unit	25	0	0.00%			
Affordable Housing	Affordable Housing	CDBG: \$	Homeowner Housing Rehabilitated	Household Housing Unit	25	0	0.00%	0	0	
Affordable Housing	Affordable Housing	CDBG: \$	Direct Financial Assistance to Homebuyers	Households Assisted	20	4	20.00%	9	4	44.44%
Affordable Housing	Affordable Housing	CDBG: \$	Overnight/Emergency Shelter/Transitional Housing Beds added	Beds	10	0	0.00%			

Code Enforcement	Affordable Housing Non-Housing Community Development	CDBG: \$	Housing Code Enforcement/Foreclosed Property Care	Household Housing Unit	800	473	59.13%	300	473	157.67%
Economic Development	Non-Housing Community Development	CDBG: \$	Jobs created/retained	Jobs	40	0	0.00%			
Economic Development	Non-Housing Community Development	CDBG: \$	Businesses assisted	Businesses Assisted	18	0	0.00%			
Planning	Non-Housing Community Development	CDBG: \$	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	Persons Assisted	800	3320	415.00%			
Public facility and infrastructure improvements	Non-Housing Community Development	CDBG: \$	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	Persons Assisted	1500	3320	221.33%	100	3320	3,320.00%
Public facility and infrastructure improvements	Non-Housing Community Development	CDBG: \$	Public Facility or Infrastructure Activities for Low/Moderate Income Housing Benefit	Households Assisted	15	0	0.00%			
Public Service	Non-Housing Community Development	CDBG: \$	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	50	0	0.00%			

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 Con Plan identified several overarching priority community development and affordable housing needs: Affordable housing for renters and homebuyers; Public awareness of fair housing laws and lead-based paint requirements; Transitional and supportive housing needs; Housing and supportive services for the elderly and disabled; Code enforcement; and Public facility and infrastructure improvement, economic development and public service. From these priorities and within the context of limited funding sources, four goals were selected for program year 2019-2020: Codes enforcement \$75,000: Public improvements \$105,000: Affordable Housing \$128,950: Planning/Administration \$74,388. Progress was made in the areas of public facility improvements, code enforcement and affordable housing. Cleveland does an outstanding job partnering with agencies in the community to maximize CDBG funds. Partnering with Community Development Organizations like Habitat for Humanity, City Fields, Bradley Cleveland Community Service Agency and Cleveland Housing Authority assist with affordable housing, home ownership, homelessness, rental assistance etc. Cleveland’s city departments provide a valuable partnership to the CDBG program as it relates to engineering design, construction, and construction inspection relating to public improvement and recreation projects.

CR-10 - Racial and Ethnic composition of families assisted

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

91.520(a)

	CDBG
White	0
Black or African American	0
Asian	0
American Indian or American Native	0
Native Hawaiian or Other Pacific Islander	0
Total	0
Hispanic	0
Not Hispanic	0

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

Narrative

Most projects and activities primarily address area benefit and not direct assistance. **The estimated racial and ethnic composition of the CDBG target area and current projects are listed in Attachment 5.** The information is derived from the U.S. Census, American Community Survey. All projects take place within the CDBG target area which is comprised of Census Tract 103, Block Group 1, 2; Census Tract 104 Block Group 1, 2; Census Tract 105, Block Group 2 ; Census Tract 107, Block Groups 1, 2, 3, 4; and Census Tract 108, Block Group 1, 2 and 3. **A map of the CDBG Target Area is located in Attachment 2.**

CR-15 - Resources and Investments 91.520(a)

Identify the resources made available

Source of Funds	Source	Resources Made Available	Amount Expended During Program Year
CDBG	public - federal	383,338	389,050

Table 3 - Resources Made Available

Narrative

Identify the geographic distribution and location of investments

Target Area	Planned Percentage of Allocation	Actual Percentage of Allocation	Narrative Description
CDBG TARGET AREA	100	100	All projects and activities take place within the CDBG Target Area

Table 4 – Identify the geographic distribution and location of investments

Narrative

All activities take place within the expanded CDBG target. **The Target Area Map and Project Map are included as Attachment 2.**

The CDBG target area is targeted for investment because of heightened need. Densely developed detached single-family homes on smaller lots have led to the City's strategy of improving public spaces and facilities, particularly those spaces used for recreational purposes. Code enforcement is needed due to the housing stock being generally older, a high percentage of rental properties. Targeting a limited area promises a larger impact.

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.

City of Cleveland has been successful in leveraging its projects since the inception of the CDBG program and continues to seek to leverage resources or to obtain other public and private funding that address needs identified in the Consolidated Plan. The Blythe Athletic Fields Project (AKA) Avery Johnson Park has been a successful project. Nearing the completion of Phase 1 of the Avery Johnson Park, it includes the construction of soccer fields, dog park, walking paths, and parking. Funding sources are: 2014 CDBG - \$30,000; 2016 CDBG - \$89,722; 2017 CDBG- 193,456; City of Cleveland cash - \$102,000; City of Cleveland donated labor and equipment usage of \$140,990 for FY 2018 and 2019 donated labor and equipment usage of \$36,900; Boyd Foundation- \$ 25,000; Urban Tree Council \$9,000.

The Lyndhurst Foundation provided funds to City Fields, a local community development agency, to conduct an area plan for the Blythe Community. A portion of those funds was used to do preliminary design on a pedestrian walkway to connect neighborhoods to the elementary school, parks and Blythe Community Resource Center. The project is funded by CDBG funds and a Tennessee Department of Health Grant. Funding sources for the pedestrian walkway: CDBG 2018 – 190,000; Non-profit - \$70,000; State of Tennessee \$150,000 per year for 3 years for a total of \$450,000. For FY 2019, City of Cleveland donated \$36,900 in labor and equipment, and final design engineering services, construction inspection services.

The City's partnerships with Habitat for Humanity and City Fields provide opportunities for affordable housing in the CDBG target area. CDBG funds provide down payment assistance to qualified home buyers.

Partnerships with local service providers like the Bradley County Health Department, Cleveland Housing Authority, Bradley – Cleveland Community Services Agency provide opportunities for outreach and training pertaining to fair housing.

CR-20 - Affordable Housing 91.520(b)

Evaluation of the jurisdiction's progress in providing affordable housing, including the number and types of families served, the number of extremely low-income, low-income, moderate-income, and middle-income persons served.

	One-Year Goal	Actual
Number of Homeless households to be provided affordable housing units	0	0
Number of Non-Homeless households to be provided affordable housing units	9	4
Number of Special-Needs households to be provided affordable housing units	0	0
Total	9	4

Table 5 – Number of Households

	One-Year Goal	Actual
Number of households supported through Rental Assistance	0	0
Number of households supported through The Production of New Units	9	4
Number of households supported through Rehab of Existing Units	0	0
Number of households supported through Acquisition of Existing Units	0	0
Total	9	4

Table 6 – Number of Households Supported

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

Affordable housing activities continue for the 2019-20 Action Plan period. Activities included down payment assistance, continued development for an affordable housing subdivisions at Victory Cove, and planning for development of Foster Lane property, in partnership with Habitat for Humanity. The homes are constructed and occupied by LMI families. Construction of homes was slightly less this year due to COVID-19.

Four families received Down Payment Assistance during the period of July 1, 2019 through June 30, 2020 . Funding years for DPA was FY 2018.

Affordable housing activities are performed by non-profit partner agencies that provide the funding sources and perform the construction/renovation of homes within the target area. Beneficiary information will be provided as home are sold to qualified homebuyers.

Discuss how these outcomes will impact future annual action plans.

Affordable housing activities will continue in partnership with Habitat for Humanity with Down Payment Assistance and continued construction of new units in subdivisions that received CDBG assistance for acquisition, down payment assistance and infrastructure improvements. These developments include Victory Cove and Foster Lane. City Fields, a Community Development Corporation, is also providing affordable housing opportunities within the CDBG target area and will receive Down Payment Assistance for eligible and approved homeowners.

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

Number of Households Served	CDBG Actual	HOME Actual
Extremely Low-income	1	0
Low-income	2	0
Moderate-income	1	0
Total	4	0

Table 7 – Number of Households Served

Narrative Information

Affordable housing activities continue with the build out of Victory Cove Subdivision and Foster Lane. Both developments received or will receive assistance from CDBG funding through acquisition, infrastructure development and down payment assistance all for affordable housing. Reporting will continue until all properties are built out. City Fields will also continue with their efforts to construct and rehab properties to sell to qualified LMI home buyers.

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

Although no CDBG or general funds have been spent on these areas, the City has developed a strategy of working cooperatively with non-profit organizations within Cleveland to assist these populations through referrals and assistance. Outreach to homeless individuals is primarily done through case managers and staff at area shelters, health care and social services agencies and facilities. These entities are the key service providers for homeless needs and manage programs to match the with the clients' needs.

Social Service groups, housing agencies , City of Cleveland staff, pastors and other interested parties have created and developed a Homeless Task Force. Created in Fall of 2018, its mission is to find solutions to address the homelessness in the community. The City of Cleveland's Senior planner serves on the Task Force. The Redevelopment Coordinator and the City Manager also attend the Task Force meetings.

Addressing the emergency shelter and transitional housing needs of homeless persons

The City of Cleveland has in the past received funding through the State of Tennessee's THDA Emergency Solutions Grant program. Funds were sub-granted to the Cleveland Emergency Services for essential services, homeless prevention and rapid rehousing. Currently there are no transitional options available within the City. Bradley Cleveland Community Services Agency has identified property for transitional housing and continues to seek funding to make this a reality. The Salvation Army continues to work toward a transitional housing facility in the area.

The Cleveland Emergency Shelter has been managed by Bradley Cleveland Community Services Agency since 1988. Through partnerships with Tennessee Department of Human Services, the City of Cleveland, Bradley County Government and the United Way of Bradley County, CES provides temporary shelter, food, and case management services to homeless individuals and families. This year, CES sheltered 282 individuals. Through the Emergency Solutions Grant, CES extends its reach beyond chronic homelessness to individuals and families who are at risk of homelessness, prevention and rapid rehousing initiatives Cleveland Emergency Shelter is now a 50-bed facility that houses males, females and families.

Cleveland Emergency Shelter recently expanded its facility to include a multipurpose room that is

utilized for group training, resident meetings and meal service for up to 75 persons. The expansion at Cleveland Emergency Shelter provided new case management opportunities. Unemployed residents are required to participate in Jobs for Life classes two to three days per week for 8 weeks. Non-resident homeless persons are served hygiene products and limited food items out of the annex on a first come first served basis.

Bradley Cleveland Community Services Agency and Cleveland Emergency Shelter case management staff also continued its efforts on landlord engagement. Case management staff has also been engaged to help people in danger of becoming homeless by finding other options, which could include connecting them with Rapid Rehousing or other preventive services and providing financial assistance.

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

The City of Cleveland has received in the past funding through the State of Tennessee's THDA Emergency Solutions Grant program. These funds were sub-granted to the Cleveland Emergency Shelter for essential services, homeless prevention and rapid rehousing. Homeless prevention funds go for security and utility deposits, and in some cases for arrearages. Case management staff of the Cleveland Emergency Shelter also seek other preventative services available in the area.

Helping homeless persons (especially chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth) make the transition to permanent housing and independent living, including shortening the period of time that individuals and families experience homelessness, facilitating access for homeless individuals and families to affordable housing units, and preventing individuals and families who were recently homeless from becoming homeless again

The City of Cleveland and the providers of services and emergency housing for the homeless have focused on meeting immediate shelter's needs. The need to end the cycle of homelessness is

recognized, but limited resources and capacity, restrict what can be accomplished and result in a focus more on daily health and safety issues. To better address homelessness , a Homeless Task Force has been created to explore options.

The City of Cleveland and Bradley County in conjunction with the Department of Veterans Affairs will be constructing a 110,000 sq. ft Veteran's Home facility on Westland Drive in Cleveland. All funding has been secured, property is secured, and design is nearing completion . The home is scheduled to open fall of 2021. It is a 108 bed facility with 18 resident houses and the project is estimated at \$45 million.

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

Actions taken to address the needs of public housing

The Cleveland Housing Authority has been serving Cleveland and Bradley County since 1959 and operates 420 conventional units of public housing on 14 scattered sites . As of June 2020, a total of 410 families resided in the public housing program and 198 families were being served in the Housing Choice Voucher program totaling \$2.5 million dollars of combined rental assistance to our community. Currently, the Public Housing waiting list is open with 146 families on the list. The Housing Choice Voucher waiting list was closed due to capacity and funding restraints and contains 51 families. The average income of residents in both programs remains at or below 30% of AMI. CHA financial support is derived from HUD in the form of Public Housing operating subsidy and Section 8 Housing Assistance funding.

The Executive Director for the Housing Authority has worked closely with the City of Cleveland regarding planning and achieving holistic and meaningful improvements for the neighborhoods and surrounding areas in which public housing communities are located.

The Housing Authority completed its strategic plan in 2008 and the redevelopment and modernization of selected properties within its portfolio has been ongoing since that time.

CHA is currently pursuing a conversion of its Public Housing Program to HUD's Multi-Family Program through HUD's Rental Assistance Demonstration (RAD). The conversion presents an opportunity for CHA to solidify its financial base using the Section 8 funding stream and exit the Public Housing Operating Subsidy funding system. The conversion also presents an opportunity for CHA to become the owner of the portfolio and thus utilize available financing methodologies to leverage additional capital for modernization and/or new construction of its affordable housing stock.

CHA intends to complete the conversion in multiple phases and will utilize a variety of methods available thru RAD. Specifically, CHA will execute a gut-rehab modernization of three hundred six (306) units of the four hundred twenty (420) that will include surgical demolition of selected units to be replaced by appropriately designed units for elderly and disabled families via new construction. Additional phases will include the disposition (sale) of select properties to CHA's non-profit instrumentality, Tanasi Housing Development Corporation to enhance the affordability of those units. Lastly, CHA may utilize HUD's Streamlined Voluntary Conversion (SVC) for any remaining Public Housing Program units to complete the conversion. The conversion will position CHA's affordable housing portfolio for financial sustainability through HUD's Multi-Family program. All conversion activities/methodologies will result in units remaining affordable and continue to serve existing and future program participants with affordable housing for low-income clients.

CHA is positioned as a Redevelopment Authority for the City of Cleveland and can work in collaboration with community stakeholders to address the affordable housing needs in the Cleveland and Bradley County area. CHA desires to develop new properties to expand its existing services to the elderly and

disabled low-income citizens in Cleveland and Bradley County through a combination of collaborative efforts which will utilize Tansai Housing Development Corporation and other funding sources and partnerships.

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

The Cleveland Housing Authority Board is comprised of seven members, including one resident. Appointments to the CHA Board are made by the Mayor of Cleveland. CHA strongly encourages the involvement of its residents in providing input into its management policies and operating procedures. CHA's Resident Associations holds periodic meetings to provide a forum for input, coordination between residents and CHA staff regarding regulatory/policy changes as well as current and future modernization activities.

Actions taken to provide assistance to troubled PHAs

No Action Required

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)

Senior Planning staff evaluate annually the land use control policies and regulations that are in effect for the City of Cleveland. No unreasonable permits, ordinances, policies or practices could be detected that would unnecessarily elevate the cost of housing. The city has no impact fees for development. The zoning ordinance allows a minimum of 7,500 square ft lots in most zoning districts. This is relatively small for single-family zones in Tennessee. The CDBG Target area consists mostly of R-2 and R-3 zoning which allows for single-family or multi-family structures. City staff continues to work with private and non-profit developers to meet regulations in a timely and cost effective manner.

The major obstacle to providing needed affordable housing is funding. The City has the capacity to provide the housing and services through various non-profit providers. The City continues to work with private and non-profits providers to facilitate development.

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

- Code Enforcement in LMI (CDBG Target Area) area
- Affordable housing efforts with local non-profits
- Public facility and infrastructure improvements in the CDBG Target Area
- Continued leveraging and partnerships with other city departments, area non-profits and interested individuals and organizations

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

Clients participating in the Habitat for Humanity developments, such as Century Village, Victory Cove or South Gate Hills, renters will be moving out of units that contain lead-based paint. City Fields, a Community Development Corporation, is actively purchasing and renovating homes within the CDBG target area and addressing lead-based paint hazards as needed.

The City received \$716,000 from the 2016 THDA HOME grant to be used for rehabilitation of owner-occupied units that will also address lead-based paint hazards. Nine homes are complete, two are being being evaluated for bid . THDA funded two tax credit projects in 2014 for Cleveland – The Premier at Hardwick (80 units of elderly housing) and Buchanan Way located on Buchanan Road (118 units). Both

developments are now complete and occupied allowing additional opportunities for safe and affordable housing units. The City will continue its partnership with the Tennessee Department of Health and other agencies to increase public awareness of environmental and health issues associated with households particularly with children. Code enforcement officers also provide public awareness of lead-based paint hazards.

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

Cleveland realizes that there are many factors related to poverty and remains committed to partnerships and continues to support local non-profits and service organizations and private organizations on development of affordable housing, rental assistance, homeless prevention, health services, and transportation.

The City continues to work with the Cleveland Housing Authority, local, state and other agencies that aid families at the poverty level. Emergency Solutions Grant funds provided by THDA help support homeless services.

The City's Code Enforcement program works toward improving the living environment for all citizens of Cleveland. Recipients of housing assistance provided by Habitat for Humanity and the City of Cleveland are counseled regarding proper maintenance procedures to preserve housing stock.

Local and regional efforts to increase job opportunities in the area and leveraging of resources in the CDBG target area are ongoing.

Collaboration and partnerships with various non-profit agencies and city departments continues. The City works closely with City Fields, a Community Development Corporation, that seeks to revitalize neighborhoods within the CDBG area.

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

Collaboration between the City of Cleveland and non-profit providers such as Habitat for Humanity, City Fields and United Way continues to strengthen. The 15 year plus partnership with Habitat for Humanity has been very successful in the efforts of moving families toward home ownership.

City of Cleveland continues to partner with the Chamber of Commerce Cleveland State, and Lee University Students, administrators and faculty whenever possible.

Actions taken to enhance coordination between public and private housing and social service

agencies. 91.220(k); 91.320(j)

The City actively supports area public and private housing and social service agencies that provide assistance to our residents. Cleveland and Bradley County are fortunate to have many agencies which are instrumental in meeting the various needs of our lower income residents. The City works directly with Habitat for Humanity, City Fields, Cleveland Housing Authority, Cleveland Emergency Shelter, Bradley Co. Health Department, United Way, Caring Place and others. One example is: City Field's mission is to be a catalyst for change in Cleveland's most overlooked neighborhoods and vision is to see overlooked communities in Cleveland be transformed through economic, physical, social and spiritual revitalization. Recognizing that deeply rooted problems of impoverished neighborhoods require interconnected solutions, City Fields seeks to catalyze change within five "fields" of work, which include the following: 1) physical revitalization, 2) neighborhood safety, 3) economic development, 4) social revitalization, and 5) leadership development. Poverty, disparity, decades of disempowerment and economic disinvestment are what City Fields is addressing in Blythe Oldfield - Cleveland's most overlooked and impoverished part of town. In the past 5 years, City Fields has secured \$7+ millions of investments into the community. This investment has significantly helped residents in the target area, as well as local businesses, partner organizations, and the physical beauty of our region's most struggling neighborhood. To achieve this goal, City Fields has partnered with the CDBG office to assist with down payment assistance and acquisition of properties. Many of the residents in the target area are renters and many have participated in home ownership classes in partnership with the University of Tennessee Extension Office. One of the roadblocks that many residents encounter is obtaining ample funds for down payment costs. In order to help qualified individuals to become home owners, CDBG funds up to \$6,000 per household are being made available for those who meet the income qualifications.

City Fields received a grant in 2018 from the Lyndhurst foundation of \$75K to hire a renowned urban planning profession- Mike Watkins. He led a series of meetings over a period of a week. There were 15 group meetings and 3 meetings open to the general public. Input was received from over 300 individuals. This resulted in a robust master plan for the Blythe Oldfield neighborhood. Implementation began in January 2019. The first project will create a safe path to school along the corridor from 9th street SE to 20th street SE. The elementary school that serves our neighborhood is on 20th street SE, but there is no safe and walkable path to reach the school. A five-foot sidewalk that will connect the neighborhood to the school. This path consist of new sidewalks, beautification of a retention pond, path around the retention pond, shade trees, lighting, and amenities. The City of Cleveland received \$450,000 Diabetes Grant from the State of Tennessee Department of Health to assist with the cost. The project is 40% complete.

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

Cleveland's 2019 Analysis of Impediments to Fair Housing Choice are: 1) Lack of public awareness of fair housing laws; 2) Southside of Cleveland is currently concentrated with low-income households and affordable housing developments; 3) Limited English proficiency is lacking with City's website and systems for disseminating information; 4) Lack of community and neighborhood organization groups; 5) Lack of landlord/tenant coordination and information. The following actions have been undertaken this year: Community outreach efforts to increase awareness of Fair Housing Laws include: City's website hosts a Fair Housing section that includes the Analysis of Impediments to Fair Housing Choice, the Fair Housing Law, Affirmatively Further Fair Housing and Housing Discrimination in English ; Habitat for Humanity, City Fields and the Cleveland Emergency Shelter, partners of the City, provide "Fair Housing brochures to participants. Fair Housing and Equal Opportunity Information Booklet was sent to 80 plus landlords that accepts Section 8 Vouchers. "Fair Housing For All Posters" were mailed to 40 plus service providers in Cleveland and Bradley County. For public meetings and citizen input opportunities, the following measures are taken: Notice of meetings in local newspaper, and city website in English and Spanish. Special accommodations offered by legal notice (physical, non-english speaking, hearing impaired). Notification for citizen input was sent to 40 plus agencies and non-profit organizations and interested parties , inviting the agency/organization and requesting the information be made available to their clients which has the ability to reach a great cross-section of the population. Spanish interpreter available to attend meetings on short notice if needed.

Cleveland encourages and support efforts to increase the supply of affordable housing through infrastructure improvements in low and moderate income neighborhoods. Cleveland is working with City Fields, a Community Development Corporation representing over 300 properties located in the Blythe Avenue, to facilitate improvements in the area and home ownership opportunities. A neighborhood association has evolved from the efforts of Impact Cleveland and the City is actively working with the neighborhood on empowerment and leadership, code enforcement, park improvements, and other issues. Also, the City provided Fair Housing brochures to recipients of a TVA Extreme Energy Makeover Grant within the target area. AFFH brochures are distributed to all participants in the program.

The CDBG office typically conducts fair housing activities while participating in a Health Fair sponsored by Bradley Cleveland Community Services Agency and the Bradley County Department at the Senior Center. The first was scheduled in October of 2019 and was rescheduled for Spring 2020. Due to COVID -19, the Spring Fair was canceled. The CDBG office will continue to participate when fairs are scheduled in the future.

CR-40 - Monitoring 91.220 and 91.230

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

The Redevelopment Coordinator under the Administration Department of the City of Cleveland will be responsible for monitoring the progress of strategies, priorities, and objectives outlined in the Consolidated Plan. The Redevelopment Coordinator is responsible for administering the CDBG program as well as monitoring of the proposed projects in the Plan. All activities will be reviewed annually to assure that they are implemented in accordance with applicable laws, ordinances and program regulations.

The City's CDBG fund accounts are formally audited separately by an independent auditing firm as part of the annual audit performed for the City of Cleveland.

Program monitoring includes: Five year Consolidated Plan completion, Annual Action Plan completion, citizen participation compliance, Consolidated Annual Performance Evaluation Review, Federal expenditure timeliness, quarterly Federal Cash transaction reports, Semi-Annual Labor Report, annual Minority Business Enterprise Report, annual Section 3 Compliance report, fair housing compliance, federal Integrated Disbursement and Information System compliance, Title VI compliance, CDBG certification, and any other requested by HUD.

Project monitoring requires: Environmental review, financial reporting, Davis-Bacon Wage rate compliance, federal and local regulatory compliance, EO/fair housing regulations compliance, HUD national objective compliance, HUD performance measurement framework, contractor review/compliance, sub-grantee monitoring, eligibility requirement monitoring, LMI and federal regulation compliance.

Annual Reports: Consolidated Plan (every five years), Consolidated Annual Performance Evaluation Report (CAPER), Annual Action Plan (AP), Amendments, and Title VI.

Semi Annual Reports: Section 3, HUD Davis Bacon Labor report, Minority Business Enterprise report. Quarterly: Federal Cash Transaction Report.

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

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

A public hearing notice was placed in the Cleveland Daily Banner on November 25, 2020 initiating a 15-day public comment period for the 2019 CAPER. The public hearing was held on December 14, 2020 as part of the City Council meeting and those attending also had opportunity to comment. The *draft* CAPER was made available during the comment period at the Development and Engineering Services Office located at 185 2nd Street, NE. The 2019-2020 accomplishments were reviewed by Council. There were no comments during the 15 day comment period.

Copies of public hearing notice and the minutes are included as Attachment 4.

CR-45 - CDBG 91.520(c)

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

The City adhered to the program objectives outlined in the 2019 Action Plan. As part of the citizen participation and planning process for the 2019 Action Plan, the need for public facility improvements and affordable housing continued to be discussed during the citizen participation process.

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

No

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

CR-45 - CDBG 91.520(c)

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