

2019 CAPER

South Jordan City, Utah



2019 Consolidated Annual Performance and Evaluation Report (CAPER)

for the use of Community Development Block Grant (CDBG) funds

Program Year 2019-2020

Fifth year of the 2015-2019 Consolidated Plan

The 2019 CAPER is required by HUD to be completed entirely within the Federal Integrated Disbursement & Information System (IDIS). The included CAPER is a download from IDIS, with its inherent formatting, structure, and tables. The City does not receive HOME or ESG funds, and sections or tables applicable to those two programs may not contain information. Attachments provided within IDIS, but not available with the download, have been added to the hard copy.

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.

The 2019 program year was the eighth year of the City's Community Development Block Grant (CDBG) program and the fifth year of the City's 5-year strategic plan (2015-2019 Consolidated Plan). The goals and objectives were advanced during the 2019-20 program year, in accordance with the 2019 Annual Action Plan. The 2015-2019 Consolidated Plan includes the following goals:

- Maintain existing housing
- Provide and improve adequate senior facilities
- Provide senior services
- Correct accessibility deficiencies
- Provide improvements in deficient neighborhoods
- Support essential services programs
- Support training and education programs
- Increase access to affordable housing

The 2019 Annual Action Plan (AAP) allocated funds to projects associated with two of the 2015-2019 Consolidated Plan goals: correct accessibility deficiencies and support essential services. Progress was also made on the goals of improving deficient neighborhoods and maintaining existing housing, through the completion of a past project and the revival of an old one.

When the Consolidated Plan was created, substantial goals were created for constructing rental units, serving seniors, and improving senior facilities. These goals were set early in the City's time as a CDBG recipient. As more was learned about what could be done with our amount of funding, priorities shifted from those types of projects. A significant factor in this change was learning that using CDBG funds could limit the City's Senior Center and its potential to move to county ownership. Hence, little to no progress has been made on those goals, while substantial progress has been made on the other types of goals.

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
Correct accessibility deficiencies	Non-Housing Community Development	CDBG: \$	Other	Other	5	278	5,560.00%			
Increase access to affordable housing	Affordable Housing	CDBG: \$0	Rental units constructed	Household Housing Unit	0	0		4	0	0.00%
Increase access to affordable housing	Affordable Housing	CDBG: \$0	Direct Financial Assistance to Homebuyers	Households Assisted	20	0	0.00%	4	0	0.00%
Maintain existing housing	Affordable Housing	CDBG: \$	Homeowner Housing Rehabilitated	Household Housing Unit	50	1	2.00%	10	1	10.00%
Provide and improve adequate senior facilities	Non-Housing Community Development	CDBG: \$	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	Persons Assisted	1000	299	29.90%	200	0	0.00%

Provide improvements in deficient neighborhoods	Non-Housing Community Development	CDBG: \$	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	Persons Assisted	0	2029		111	1960	1,765.77%
Provide improvements in deficient neighborhoods	Non-Housing Community Development	CDBG: \$	Other	Other	15	0	0.00%	3	0	0.00%
Provide senior services	Non-Homeless Special Needs	CDBG: \$	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	1000	299	29.90%	200	0	0.00%
Support COVID-19 relief efforts, as needed	Affordable Housing Non-Homeless Special Needs Economic Development	CDBG: \$	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	48	0	0.00%			
Support COVID-19 relief efforts, as needed	Affordable Housing Non-Homeless Special Needs Economic Development	CDBG: \$	Jobs created/retained	Jobs	5	0	0.00%			

Support essential services and training programs	Homeless Non-Homeless Special Needs	CDBG: \$	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	1000	1542	154.20%	220	482	219.09%
Support training and education programs	Homeless Non-Homeless Special Needs	CDBG: \$5000	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	Persons Assisted	20	0	0.00%			
Support training and education programs	Homeless Non-Homeless Special Needs	CDBG: \$5000	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	0	40		4	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 City was awarded \$235,263 in CDBG funds for the 2020-21 program year. This was a 3% increase from the previous year's grant (\$228,033). While the City’s Consolidated Plan was updated in 2015, the goals remained similar to the previous Consolidated Plan. The primary focus of funding for this program year has been a city infrastructure project to improve ADA ramps in neighborhoods throughout the City. Project is out to bid, but construction has not yet begun.

Due to a limited amount of CDBG funding, the City does not typically fund housing activities with CDBG funds. The City has carried over prior-year funding for an activity that provides accessibility upgrades and emergency home repairs. Thanks to greater coordination between the City and the subrecipient, two activities were completed, benefitting one household, with more in the works. While the City also reports on permits

issued for accessory living units during the year, based on the average rents for accessory living units qualifying as affordable, they have not been included in the accomplishments for the program year since no CDBG funding was used for constructing these units. The City issued 23 permits for accessory living units during the year, up from 19 the previous year.

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	HTF
White	350	0
Black or African American	6	0
Asian	9	0
American Indian or American Native	3	0
Native Hawaiian or Other Pacific Islander	1	0
Total	369	0
Hispanic	124	0
Not Hispanic	245	0

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

Narrative

In all cases the numbers reported are individuals. In some cases, depending on the project or activity type, those individuals are reported as a head of household and represent other individuals in the household or family. The table above, as generated by HUD, does not show beneficiaries who reported as being multi-race, hence a difference between totals here and on the goals.

The majority of reported beneficiaries are, by race, white (94.8%) and, by ethnicity, are not Hispanic (66.4%). By comparison, the most recent Census data (ACS 2018 5-year estimates) reports the City's residents as 91.9% white and 94.2% not Hispanic.

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	235,263	60,702

Table 3 - Resources Made Available

Narrative

The 2020-21 CDBG grant award was \$235,263, and 25.8% of the award has been drawn. The remaining balance is \$174,562. Of the remaining balance, \$16,298.25 is for planning and admin. The remainder is for the ADA ramp project on which bidding recently closed; construction is scheduled to be completed in November 2021.

Identify the geographic distribution and location of investments

Target Area	Planned Percentage of Allocation	Actual Percentage of Allocation	Narrative Description

Table 4 – Identify the geographic distribution and location of investments

Narrative

The City has not identified nor distributed funds according to target areas.

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.

All sub-recipients receiving CDBG funds for 2019-20 program year projects provide regional services and receive funds from a combination of private, other local governments, state, and federal sources. All 2019-20 City-managed projects were supported by labor and technical assistance from City employees.

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	0	0
Number of Special-Needs households to be provided affordable housing units	0	0
Total	0	0

Table 5 – Number of Households

	One-Year Goal	Actual
Number of households supported through Rental Assistance	0	17
Number of households supported through The Production of New Units	0	0
Number of households supported through Rehab of Existing Units	0	1
Number of households supported through Acquisition of Existing Units	0	0
Total	0	18

Table 6 – Number of Households Supported

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

Largely due to the modest amount of CDBG funds received annually by the City, it has been expected that the City would further affordable housing through other means, such as the Redevelopment Agency and Accessory Living Units.

In 2012, the City adopted the Accessory Living Unit Floating Zone to allow for guesthouses and accessory apartments on single-family properties. The expectation is that the market rate rents of such units

would be affordable. During the 2019-20 program year, the City approved a total of 23 accessory units. These numbers were not reported as accomplished goals due to no federal funding being used to construct these units. Currently, the City is revising its ALU ordinance to simplify it, making it easier for staff to apply consistently and easier for residents to understand and utilize. Due to land availability, this is the strongest strategy in the City currently for creating new affordable housing units.

The City does have unexpended prior-year funds with a program that provides accessibility upgrades and emergency home repairs for eligible households. During the 2019 year, the City re-established ties with the subrecipient, Assist. As a result, two activities for one household were completed. More applications are in the works for the 2020 program year.

In 2014, the City joined the local HOME Consortium. Through HOME Consortium funds, among other things, a down-payment assistance program that is open for South Jordan residents and is sponsored by the Community Development Corporation of Utah. During 2019-2020, CDCU received \$50,000 of HOME funds from the county for purchases in South Jordan, Sandy, and West Jordan. No applicants purchased in South Jordan, and the funds were used by applicants purchasing homes in West Jordan. No funds are available through HOME and CDCU for South Jordan in 2020-21.

In January 2020, the City Council approved two programs (down payment assistance and housing rehab) to be funded by the City's Redevelopment Fund. These will be the City's main avenue of tackling affordable housing since more funding is available through the RDA than CDBG. In the wake of COVID-19 the City also approved RDA housing funds to be used for rental assistance through its current subrecipient, Utah Community Action (UCA). Through the RDA, the City has partnered with a developer to build workforce housing and is actively looking for another opportunity to build more.

Under previous CDBG coordinators, activities through UCA were reported under housing counseling instead of rental assistance. The activity includes both but is better reported as rental assistance. Starting with the 2019 year, this reporting error was fixed and counts above reflect that change.

Discuss how these outcomes will impact future annual action plans.

The City's 2020-21 AAP established similar goals. Due to unexpended, but available, funds for emergency home repairs and rehab and the creation of an RDA-funded down-payment assistance program, the 2020-21 AAP did not include funding for these housing-related projects.

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	HTF Actual
Extremely Low-income	12	0	0
Low-income	6	0	
Moderate-income	0	0	

Total	18	0
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Table 7 – Number of Households Served

Narrative Information

The City adopted a Moderate Income Housing Plan in November of 2019. Compared to the City’s 2014 Housing Needs Study, there are more rental options available within the City, but a lower proportion of SFRs are available as rentals. In 2014 about 9.4 percent of SFRs were rentals, compared to the 6.7 percent today. However, the overall proportion of rentals of all types has increased from 18.9 percent to 23.1 percent. But the Census’s 2017 American Community Survey (ACS) data estimated 63 percent of all rentals have a gross rent above \$1,000 per month. The median gross rent is \$1,405, compared to the County’s \$1,015. Additionally, compared to the 2014 Housing Needs Study, overall home prices in the City have risen dramatically. In 2014, about 71 percent of homes were below \$300,000. Now only 24 percent are below that value.

As the population and number of households continue to rise, the City will have greater need to provide housing that meets the needs of residents and those interested in moving to the City. The current shortage plus that additional need each year means that (assuming current distributions of household incomes) the City will have a need of 10,370 affordable housing units by 2024. A large portion of this is made up of the current shortage with an additional 505 to 560 per year until 2024. Just five years ago the City had an excess of affordable moderate-income housing, but—despite best efforts by the City—housing affordability is a major statewide issue presenting challenges for all communities.

The City will need funds much more substantial than CDBG to address this affordable unit shortage. The City plans to use RDA funds for this purpose.

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

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

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

The City provided CDBG funds to support two of the leading agencies in the region serving homeless needs and working to reduce homelessness: the Road Home and South Valley Sanctuary. Funds were also provided for a third year to the INN Between, which celebrates the 5-year anniversary of its founding this year. There are currently no facilities or programs operating within the City itself.

The Road Home is considered by the City to be the most comprehensive single agency in the region serving the homeless. According to their year-end report, the Road Home served 12 South Jordan residents. These individuals from South Jordan received a total of 372 shelter stays and had access to case management, showers, meals, clothing, health and mental health services, and referrals to other community resources.

South Valley Sanctuary provides shelter and services for victims of domestic violence in the region. Their services are available to women, men, and children. In addition to shelter needs, they operate two Community Resource Centers, a 24/7 hotline, and several education programs. Whereas the shelter is a confidential location, the Community Resource Center and hotline make resources available for a broader range of needs and without having to shelter all individuals with needs. This program year, South Valley Sanctuary provided the following services to South Jordan residents: 71 crisis hotline calls, 112 case management services, 34 clinical services, 5 sexual assault services, and 8 emergency shelter stays. Due to COVID-19, this was a significant increase in residents served.

The INN Between provides shelter and services for homeless individuals requiring respite or hospice care. Their primary goal is to ensure those who are terminally ill can experience the end of life with dignity. As of the time of writing, the INN Between proudly reports that their home is still COVID-free. According to their year-end report, 3 South Jordan residents received medical care and shelter.

Addressing the emergency shelter and transitional housing needs of homeless persons

The City funds the Road Home, in part, because of their overall approach towards homelessness. The Road Home provides emergency shelter and programs for transitional housing for homeless persons. The City also funds the INN Between because of the unique role it provides in providing medical care and hospice, helping homeless persons discharged from a hospital to recover in a safe location with the needed medical care. They are currently the only providers of this service.

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

As has been mentioned, the Road Home manages a very comprehensive program founded on a Housing First approach. Their Pay for Success Program targets individual men and women with shelter stays between 90-364 days. Services offered by the Road Home include programs for transitional housing.

The INN Between is Utah's first and only hospice for individuals experiencing homelessness, solving a critical gap in end of life care for the community's homeless adults. All their clients are extremely low income. They range from the chronically homeless to those facing first time homelessness when their disease leads to medical bankruptcy. When homeless individuals are admitted, the hospitals must safely discharge them, otherwise, the patient must remain in the hospital, at great cost to the community. The INN Between services this particularly vulnerable group.

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

One of the primary objectives of the City's CDBG programs is to "support family and individual stability, self-reliance, and prosperity." The City's CDBG program supports a wide range of public services that serve essential needs (shelter, food, health care) of individuals who may be facing homelessness. The majority of these public services have a comprehensive and collaborative approach to helping homeless persons transition out of homelessness.

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

Actions taken to address the needs of public housing

There are currently no public housing facilities located within the City, and public housing is not directly addressed by the City's CDBG program. However, regional public housing issues are addressed by the local HOME consortium, of which the City is a member.

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

Not applicable.

Actions taken to provide assistance to troubled PHAs

Not applicable.

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)

During the 2019-2020 program year, the city issued permits for 1222 residential units (according to City Building Division data). Of those, 63% (up from 46% last year) were for non-single family detached housing (townhomes, condos, apartments). During the program year, the city issued 981 residential permits. Of those, 82% (up from 78% last year) were in one large mixed-housing project (Daybreak).

In 2019, the City adopted an updated General Plan, including a Moderate Income Housing Plan. The Housing Plan includes the following goals:

1. Ensure development of well-designed housing that qualifies as Affordable Housing to meet the needs of moderate-income households within the City.
2. Promote the development of diverse housing types that provide life-cycle housing for a full spectrum of users.
3. Maintain existing and well-maintained single-family residential neighborhoods.
4. Facilitate the growth of new, safe, and well-planned neighborhoods within the City.

Daybreak, a master-planned development within the City, is a significant contributor to reaching these goals. As noted above, most residential growth is happening in this area and includes small lots and non-single family detached housing. The densest part of Daybreak is forthcoming.

The City continues to actively participate in the local HOME consortium. This year, funding for several affordable housing developments were approved through the consortium's vote.

During the 2018-19 program year, the manager of the City's Redevelopment Agency (RDA) secured approval for a Workforce Housing project in partnership with a local developer. The project will create 9 affordable units for households that are 80% AMI or less. Construction has now begun on this development. In January 2020, the City Council approved housing repair and down payment assistance programs for LMI individuals. Work is being done on these programs to prepare for their launch.

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

Prior to the 2016-17 program year, the majority of CDBG funding served the needs of seniors in the community. The 2016-17 program year started a transition away from seniors and included a focus on some of the needs in the City's neighborhoods. The majority of the 2018-19 funding was allocated to constructing new ADA ramps that were identified to be non-compliant to current regulations.

The City also continues to be open to ways to better serve the needs of residents through public

services. The 2019-20 AAP also included a new public service providing healthcare.

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

Based on Census data and City estimates, over 90% of all housing within the City has been built since 1978, so lead-based paint is not considered to be a widespread concern in the City. For similar reasons, the Salt Lake County Health Department has recently discontinued testing and remediation programs. The focus of the Health Department is now on education. Residents of South Jordan can access Health Department information at www.slcohealth.org/programs/leadFreeKids/index.

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

The 2019-20 program year is the fifth year of the 2015-2019 Consolidated Plan. One change from the previous Consolidated Plan was a goal to "Support Training and Education Programs." The goal was added to encourage CDBG-supported projects that result in the reduction of poverty-level families. One project that directly addresses this goal was funded in the 2019-20 program year: the Utah Community Action Case Management and Housing Program. Accomplishments through this program were reported under rental subsistence payments, however, all of those reported there also received education through the program. In the 2020-24 Consolidated Plan, a renewed and clearer focus on education has been adopted.

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

The 2019-2020 program year was the eighth year of the City's CDBG program. The City continues to strive to improve its program. In June of 2019, Katie Olson was appointed the CDBG Coordinator. This staffing change should allow for more staff time dedicated to CDBG than was available under the previous set-up. The creation of the 2020-2024 Consolidated Plan included a rigorous effort by the CDBG Coordinator to improve internal communications about potential activities and awareness of CDBG funding uses. The City has relied on guidance from HUD staff and has sought to take advantage of training opportunities, including attending an NCEA CDBG Basics course.

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

In preparation for the 2020 Consolidated Plan, the CDBG Coordinator held meetings with all of our subrecipients who provide public services, in addition to a housing nonprofit. Some site visits were held before COVID-19 limited in-person efforts. This effort has resulted in significantly improved relations between the City and local service providers, including increased name recognition, more regular check-ins, and some much needed face-time. Although the lack of funds limits what the City can do with CDBG funds to address housing, the City strives to maintain a good relationship with the housing authority and other housing agencies serving residents of South Jordan. The City's involvement with the HOME consortium has provided opportunities to build relationships with a wider range of housing and service

providers in the region.

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

The Regional Analysis of Impediments to Fair Housing Choice (2014) identified the following three impediments specific to South Jordan:

- Housing plan fails to address affordable rental housing
- Large single-family lots
- Absence of rent-assisted family rental units.

Housing plan fails to address affordable rental housing

During the program year, the City issued permits for 23 guesthouses and accessory apartments. The ALU ordinance is also currently being revised to improve simplicity and application. This is a significant step towards encouraging rental units in areas of the City where land is not available for new builds.

Dominance of large single-family lots

During the 2019 program year the City permitted 804 dwelling units in the Daybreak community, the majority of those permits consisting of small-lot single family and townhomes.

Absence of rent-assisted family rental units

The City continues to participate in the local HOME consortium, which directly funds regional projects that include support for existing rent assisted units and the development of new units.

The RDA-funded workforce housing project is a step toward this impediment.

Additionally the City has reduced parking requirements for transit-oriented development and is planning and creating opportunities for mixed-use development near transit that includes affordable housing.

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 typical standards and procedures used to monitor activities follow the 2019 Monitoring Plan.

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.

The City's Citizen Participation Plan (March 2012) was prepared and approved in preparation for the initial consolidated plan planning process. The Plan was also included in the 2015-2019 Consolidated Plan. The Citizen Participation Plan identifies the process for plan and report preparation, was reviewed regularly throughout the program year and was followed in preparing the 2019 CAPER. In May of 2020, the Citizen Participation Plan was amended to allow for virtual hearings, due to COVID-19. A public hearing to approve the CAPER was held on Sept. 15, 2020. The draft of the CAPER was available online, at City Hall, and by request from Aug. 28 through Sept. 28. Public notice was issued online and in two major newspapers, announcing availability of the draft and information for the public hearing.

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 did change program objectives during the program year as part of its amendment to allow for CDBG-CV funds. The goal of “preparing, preventing, and responding to the coronavirus” was added. Outside of these CV changes, no other changes were made.

The 2019-20 program year did provide the opportunity to address underserved goals of the 2015-19 Consolidated Plan. After years of addressing improvements at the City’s senior center, the CDBG program continued its transition towards a focus on the goal to “provide improvements in deficient neighborhoods.” The majority of funding from the 2019-20 program year was directed towards replacing ADA ramps that were out of compliance. A revival of the 2015 activity to provide housing repairs also furthered this goal.

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-56 - HTF 91.520(h)

Describe the extent to which the grantee complied with its approved HTF allocation plan and the requirements of 24 CFR part 93.

Tenure Type	0 – 30% AMI	0% of 30+ to poverty line (when poverty line is higher than 30% AMI)	% of the higher of 30+ AMI or poverty line to 50% AMI	Total Occupied Units	Units Completed, Not Occupied	Total Completed Units
Rental	0	0	0	0	0	0
Homebuyer	0	0	0	0	0	0

Table 15 - CR-56 HTF Units in HTF activities completed during the period