





City of Greenville



COMMUNITY DEVELOPMENT BLOCK GRANT (CDBG) and HOME INVESTMENT PARTNERSHIP (HOME) 2012 ANNUAL ACTION PLAN

Revised 05/30/2012swa



P.O. Box 7207, GREENVILLE, NORTH
CAROLINA 27835



TABLE OF CONTENT

I.	Executive Summary	
A.	Purpose	4
B.	Background	4
C.	Geographic Area	5
D.	Geographic Allocation of Investments	5
E.	Strategies to Meeting the Underserved Need	5
 II.	 Source of Funds	
A.	CDBG Program	9
B.	HOME Investment Partnership	10
C.	Affordable Housing Bond Program	10
D.	Funding Summary Chart	11
 III.	 Citizen Participation Plan	 12
 IV.	 One Year Action Plan	
A.	Introduction	13
B.	Performance Measurement	14
C.	2012-2013 Action Plan Projects	16
D.	CDBG/HOME Funding Chart	21
 V.	 Other Actions	
A.	Affirmatively Furthering Fair Housing	22
B.	Analysis of Impediments to Fair Housing	22
C.	Affirmative Marketing Policy	26
D.	Women/Minority Business Outreach	26
E.	Evaluation and Reduction of Lead-Based Paint Hazard	26
F.	Anti-Poverty Strategy	27
G.	Developing Institutional Structures	28
H.	Public Housing	28
I.	Recapture Provisions	29
J.	Section 3 Requirements	30
 VI.	 Monitoring Plan	 31
A.	HOME Program Schedule	32
B.	CDBG Program Schedule	33

VII. Strategy to Eliminate Homelessness	
A. Continuum of Care	34
B. Ten-Year Plan to End Homelessness	34

APPENDICES

- A.** Resolution Adopting Plan
- B.** Required HUD forms
- C.** 2012 Budget Chart
- D.** Maps
 - West Greenville 45-Block Revitalization areas
 - 2010 Census Tracts
- E.** Legal Advertisements
- F.** Citizen Participation Plan
- G.** Anti Displacement and Relocation Plan
- H.** Affirmative Marketing Policy
- I.** Section 3 Plan

I. EXECUTIVE SUMMARY

A. Purpose

The Action Plan is a requirement of the Department of Housing and Urban Development (HUD) as a condition of receiving funding under certain federal programs. The goal of the Plan is to extend and strengthen partnerships among the public and private sector to provide decent housing, establish and maintain a suitable living environment, and expand economic opportunities.

This plan serves as the City's application for federal funding for the following federal entitlement programs:

- Community Development Block Grant (CDBG)
- HOME Investment Partnership Program

B. Background

The 2012-2013 Annual Action Plan represents the fifth year of the City of Greenville Consolidated Plan. The current Consolidated Plan was approved on May 8, 2008, by the City Council. The plan identifies a comprehensive strategy to address community needs for the five-year period of 2008-2013. The plan associates goals and objectives with current needs throughout the five-year period. The goals and objectives identified guide staff in selecting activities to be carried out during each fiscal year. The top priorities and goals determined in the Consolidated Plan include the following:

1. Revitalization of several neighborhoods in West Greenville that are in a state of decline through:
 - Rehabilitation of owner occupied units.
 - Acquisition and demolition of dilapidated rental housing.
 - Acquisition of vacant parcels to assemble land for suitable building sites
 - Construction of affordable housing in West Greenville Revitalization area.
 - Establishing a neighborhood commercial focus area.
 - Preserving the historical business district along Albemarle Avenue and West Fifth Street.
 - Conversion of rental dwellings to owner occupied dwellings with downpayment assistance.
 - Identification of infrastructure improvements.
 - Improving but preserving the neighborhood character.
 - Developing programs and services with the private sector that will aid in the success of revitalization efforts.
 - Landscaping/Streetscape improvements.

2. Supporting nonprofits that provide housing assistance to special needs populations, provide youth services, and encourage entrepreneurship.
3. Providing homebuyer assistance for first-time homebuyers.
4. Continue to eliminate lead-based paint hazards in dwellings assisted with federal funding.

C. Geographic Area

The City of Greenville, North Carolina is located in the coastal plains area of the State, in Pitt County. It is geographically located 84 miles east of Raleigh, 157 miles south of Richmond, VA, and 265 miles south of Washington, DC.

Greenville is the tenth largest city in North Carolina (pop. 84,544) based upon the 2010 Census. From 2000 to 2010, the population increased by almost 40 percent, growing by 39.8 percent from 60,476 in 2000 to 84,544 in 2010. Over the past 20 years the community has experienced dramatic growth. Greenville is slowly emerging as a major industrial and economic center for Eastern North Carolina, a center for education, industry, medicine and culture.

D. Geographic Allocation of Investment

Program activities carried out by the City of Greenville will occur throughout the City, but some specifically within the West Greenville 45-Block Revitalization Area (**Appendix C**). This area can be defined as bounded on the north by West Fifth Street, on the west by Bancroft Street, on the east by Albemarle Avenue and to the south by Fleming Street. The area involved has been a target area for City of Greenville housing programs for many years. Recent efforts have substantially reduced the area currently being targeted in an attempt to address urgent needs in a more concentrated approach. Please see attached maps of census tracts that are areas of minority concentration and low income block groups (**Appendix C**).

Some program data indicates that minority populations comprise a majority of the targeted income groups. However, eligible persons from all racial, ethnic and gender groups are given the opportunity to participate in any of the housing programs.

E. Strategies to Meeting the Underserved Need

The City of Greenville has established the following strategies for meeting the needs of the underserved in the community.

1. Housing Strategies

a. Downpayment Assistance

The City of Greenville continually seeks methods for fostering and maintaining affordable housing. Funds during the 2012-2013 Program Year have been reserved for downpayment assistance to low-moderate income homebuyers within the City of Greenville. Funds will be used to address goals for increasing homeownership throughout the City. Funding from previous years has also been made available to homebuyers as downpayment assistance. Provision of downpayment assistance decreases the amount of financing and/or funding a homebuyer needs in order to purchase a home. To date, we have assisted 51 families with funding from the North Carolina Housing Finance Agency totaling \$808,289 and 54 families under the HOME Program for a total assistance of \$628,325. The City also provides assistance with local bond funds to aide with downpayment or closing costs. Bond funds are awarded to qualifying applicants as a no interest loan up to 5% of the purchase price of the home and amortized over 5 years. Twenty-nine (29) families have received assistance totaling \$53,209.

b. Development of Affordable Housing

In an attempt to address the barriers to developing affordable housing, the City of Greenville continues to create single family affordable housing opportunities. Properties are purchased by the City with local public bond funds. Upon acquisition and installation of infrastructure, the City then makes lots available to nonprofit agencies for development. All nonprofit proposals are accepted based on a reasonable price per square foot and the nonprofit's ability to meet building specifications as required by the Request for Proposal. Purchase of the land and improvements increases the affordability of the lots in turn reducing the cost to the homebuyer. As lots are sold to eligible homebuyers, the funds for the lot cost are recaptured and used to fund future developments.

c. Partnerships

The City of Greenville partners with local nonprofit agencies to provide Homeownership Counseling & Workshops for potential homebuyers. The City also offers a Homeownership Academy that provides participants with the opportunity to gain working knowledge of the home buying process and to prepare financially to purchase a home within the West Greenville 45-Block Revitalization Area. At program completion, participants receive a certificate for \$500.00 redeemable at closing to assist with the purchase of an existing or new home within the West Greenville 45-Block Revitalization Area.

2. Community Development Strategies

a. Revitalization

The intended actions in the West Greenville Area Revitalization Redevelopment Plan are to build upon the strengths of the area and remove obstacles that limit the possibilities for success. The goals of the plan in this area are to increase the levels of homeownership, remove blighting influences, improve the public infrastructure, create continuous and ongoing programs with service providers to address the social issues of the community, and to provide quality economic development and commercial opportunities for the area and for its residents.

b. Multifamily Development

Located within the City limits of Greenville, Winslow Pointe is a new community composed of 84 affordable apartments at 40%, 50% and 60% restriction on income. The property will offer 1, 2, and 3- bedroom apartments. The site is located on the NW corner of Hooker & Burrington Road surrounding the old Winslow home. This location is in the central part of Greenville located near JH Rose High School, shopping, parks and medical facilities. The natural boundaries that surround the site make this property unique for an area within the city limits in close proximity to so many services.

This project will be funded in part with HOME Investment Partnerships funds, Low Income Housing tax credits and private investments. NRP Group its affiliated companies will form the construction and development team.

c. Infrastructure Improvements

Planning and design work were completed in 2011 on two major public infrastructure projects that collectively will help to reshape the functionality and image of Greenville's Center City. Two streetscape project, the West Fifth Street Gateway and the Cotanche and Reade project will respectively improve aesthetics, vehicular and pedestrian safety, and will provide Greenville's citizens with a first of its kind opportunity – municipally sponsored public art.

3. Economic Development Strategies

a. Façade & Site Improvement Grant Program

Maintaining the architectural quality and aesthetic appeal of commercial and office structures in the West Greenville Redevelopment Area is an important part of the overall strategy to restore the economic vitality of West Greenville. Proper improvements to the exterior of individual buildings will help to develop an image that will invite additional investments into the area.

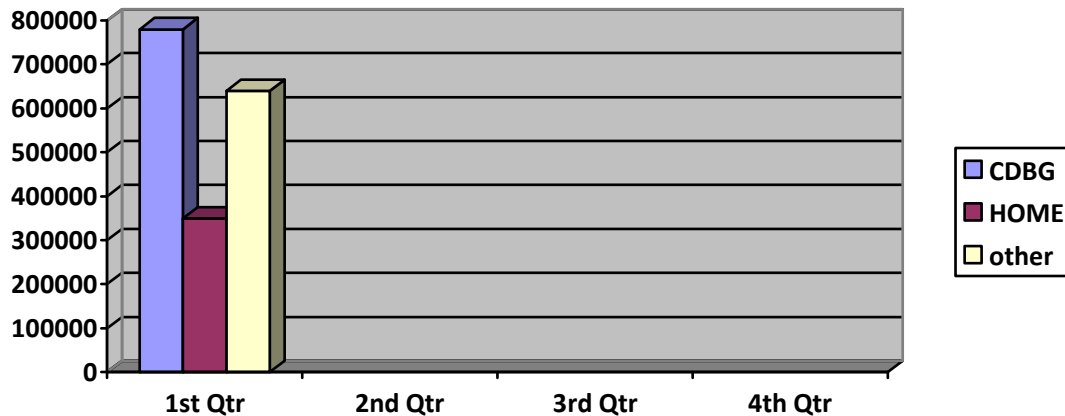
The Greenville Redevelopment Commission developed the Building Blocks Façade and Site Improvement Grant Program to provide an incentive to property and business owners to make improvements to their properties. These programs provide property owners, tenants, architects and contractors involved in exterior improvements or rehabilitation to buildings in the West Greenville Redevelopment Area with recommended improvement standards.

b. Small Business Incubator

The Redevelopment Commission of Greenville contracted with the Small Business and Technology Development Center (SBTDC), a state agency, to study the feasibility of establishing a small business incubator within the geographic bounds of the West Greenville Redevelopment Area. The incubator mission will be to create an open, business-first small business incubator that will cultivate entrepreneurship, and promote economic development and community revitalization within the West Greenville Redevelopment Area. CDBG funds will be used to supplement the project.

I. SOURCES OF FUNDS

Resources available to support activities identified in the Consolidated Plan and this Annual Action Plan will include Community Development Block Grant, HOME Investment Partnership, general revenues, local Bond program, North Carolina Housing Finance Agency, private lending institutions and private developers.



A. CDBG Program

The Housing and Community Development Act of 1974 created the Community Development Block Grant program in 1974. Since 1975, the City of Greenville has participated in the program with a variety of activities. The City of Greenville became an Entitlement Community in 1994. As an Entitlement Community, the City receives an annual funding allocation from the U.S. Department of Housing and Urban Development. The primary objective of CDBG is the development of viable urban communities by providing decent housing, a suitable living environment, and expanding economic opportunities. All activities carried out must meet one of the three National Objectives. Those objectives are:

- Benefit low-moderate income persons;
- Aid in the prevention or elimination of slums or blight; or
- Addressing an “urgent need”

B. HOME Investment Partnerships Program

The HOME Investment Partnerships program was created by the National Affordable Housing Act of 1990 to create local partnerships for providing decent affordable housing to lower income households. This program seeks to encourage local jurisdictions to work with nonprofit organizations and the private investment community to achieve this goal. Cities receiving HOME funds must reserve 15% of their HOME funds to Community Housing Development Organizations (CHDOs) for affordable housing development.

In 1997, the Pitt County HOME Consortium was formed. The Consortium included the City of Greenville as lead entity, the Towns of Farmville, Ayden, Bethel, Grifton and Pitt County. The Town of Winterville became a member in 2001.

In January 2008, the City Council of Greenville approved disbanding the Consortium partnership and submit application to become a “Participating Jurisdiction” for HOME funding. This Action Plan represents Greenville’s second year as a HOME Participating Jurisdiction.

Local match requirement for the 2012-2013 HOME Program is approximately \$87,500. These funds come from local funds earmarked for Affordable Housing and for meeting match requirements. The funds will be used to augment HOME funded projects. The Greenville HOME program currently has a match credit of \$1,052,437, which will be carried over. Despite the match credit, the City continues to identify a match with all projects, evidence of which is detailed on the match log.

C. Affordable Housing Bond Program

On November 2, 1992, the citizens of Greenville approved a \$5 million bond referendum for affordable housing. The funding was divided into three revolving loan categories. The categories include homeownership, land banking, and elderly housing rehabilitation. Loans are continually recaptured and reinvested into the program fund to further efforts to promote and preserve affordable housing. This bond led to the production of 161 affordable homes for first time low and moderate income buyers and flood survivors and over 153 loans to low and moderate families for home purchases and rehabilitation of low income elderly homeowner residences. These funds have been recycled since 1992 and are available for the West Greenville 45-Block Revitalization program and other affordable housing initiatives of the City of Greenville.

In 2004, citizens approved a \$10 million in bond referendums for the revitalization efforts in the Uptown and West Greenville 45-Block Revitalization focus area.

D. Funding Summary Chart

Source	Amount	Description
Community Development Block Grant (CDBG)	\$781,037	Funds will be used for administration, housing rehabilitation, acquisition, relocation, public service, public facility improvements, economic development and clearance/ demolition.
HOME Investment Partnership	387,237	Funds will be used for administrative cost, housing rehabilitation, new construction, down payment assistance, and CHDOs.
General Revenue	\$300,000	Funds to leverage administrative/operating costs for staff and other local municipal appropriations to support programs.
Affordable Housing Bond Program	\$120,000	A 1992 Bond Referendum for preservation and creation of affordable housing in the City of Greenville.
Private Investment	\$220,000	Private investment for first time homebuyers to purchase Affordable Housing Citywide to improve housing stock.
Program Income	\$60,000	Funds generated from recaptured activities of CDBG and HOME assisted units.
Total All Sources	\$1,868,274	Approximate total of all sources

III. CITIZEN PARTICIPATION PLAN

The City of Greenville continues to acknowledge the importance of citizen participation in developing activities for each upcoming year. Revisions to the Citizen Participation Plan were placed into effect as of September 11, 2003 (see **Appendix F**) in an effort to increase public awareness. Despite the recent changes to the current plan, we will continue to search for avenues to increase the level of participation by the community. Resources to better our current plan will include HUD recommendations; contact with other cities to review their plans; and most importantly, the consideration of input from the local community to increase involvement.

The City also encouraged public participation in developing the 2012-2013 Annual Action Plan by making a copy of the plan available to the Affordable Housing Loan Committee members, Redevelopment Commission, Continuum of Care; and a copy accessible at all City Community Recreational Centers, Library and Housing Division Office for the general public, nonprofits and other interested parties to review and submit comments from March 5, 2012 through April 13, 2012. In addition, a community meeting was held at Sheppard Memorial Library on Thursday, February 9, 2012 to get community input on the Plan. The following comments were received:

1. Convert transitional housing projects to permanent housing.
2. Provide information on total homeownership cost in brochures.
3. Provide post ownership counseling.
4. Make Greenville Utilities part of homebuyer education workshop.
5. Change design standards to reduce utility costs.
6. Create more affordable rentals.
7. Create a tenant based rental assistance (TBRA) program.
8. Involve Realtors in new home construction projects.
9. Create projects for homeless population.
10. Improve non-profit capacity.
11. Consider new non-profit organizations in business incubator for capacity building.

In addition, two Public Hearings were held for citizens to provide input on January 12, 2012 and April 12, 2012 during City Council meetings. No comments received.

IV. ONE YEAR ACTION PLAN

A. Introduction

The 2012-2013 Annual Action Plan describes the CDBG and HOME activities proposed for the 2012 fiscal year. The Five-Year Consolidated Plan guides development of the plan and selection of activities to be undertaken. The plan also includes the resources available to perform the activities; a detailed description of the activities, and maps depicting the areas in which the activities will occur.

The activities to be undertaken by the City of Greenville for the 2012-2013 fiscal year will include Program Administration, Owner-Occupied Housing Rehabilitation, New Construction, Clearance & Demolition, Public Service, Public Facility Improvement, Economic Development, Community Housing Development Organizations, Relocation Assistance, and Substandard Property Acquisition. Staff anticipates that a majority of the proposed activities will be completed within the program year with a few extending into future years.

In addition to routine Community Development activities through the CDBG and HOME Programs, we continue to expand the supply of new single family affordable housing units with the assistance of local bond funds. These new units require the experience and oversight of the City of Greenville Housing Division. The City of Greenville has constructed a total of 162 units throughout the City. See the breakdown below:

New Single Family Units	Total Units
Singletree	24
Carolina Heights	15
Red Oak	1
Countryside Estates	105
West Greenville	17
Total	162

B. Performance Measurement

The focus on demonstrating performance and results is present at all levels of government and in the private sector. Performance measurement is a program tool that can help housing and community development practitioners collect data, track progress, and report on program results in a way that speaks to the impact a program has had on a community and the lives of its residents. Performance Measurement is an organized process for gathering information to determine how well programs and activities are meeting established needs and goals. There are three main components to Outcome Performance Measurement System: Objectives; Outcomes; and Indicators.

1. Objectives:

Performance Measurement offers three possible objectives for each activity. These objectives are based on the broad statutory purposes of the four Community Planning and Development programs:

a. Creating Suitable Living Environments

This objective relates to activities that are designed to benefit communities, families, or individuals by addressing issues in their living environment. The activities are intended to address a wide range of issues faced by low and moderate income persons, from physical problems with their environment, such as poor quality infrastructure, to social issues such as crime prevention, literacy, or elderly health services.

b. Providing Decent Housing

This objective focuses on housing activities whose purpose is to meet individual family or community housing needs.

c. Creating Economic Opportunities

This applies to activities related to economic development, commercial revitalization or job creation.

2. Outcomes:

The second component of the system is outcomes, which are closely related to objectives. The program outcome helps further refine the objectives and is designed to capture the nature of the change or the expected result of the objective to achieve. The following are the three identified:

a. Availability/Accessibility

This applies to activities that make infrastructure, public services, public facilities, housing or shelter available or accessible to low and moderate income people, including persons with disabilities.

b. Affordability

These are activities that provide affordability in a variety of ways to low and moderate income people. It can include the creation or maintenance of affordable housing, basic infrastructure hook-ups or services such as transportation or day care.

c. Sustainability

This applies to activities that are aimed at improving communities or neighborhoods, helping to make them livable or viable by providing benefit to persons of low and moderate income by removing or eliminating slums or blighted areas, through multiple activities or services that sustain communities or neighborhoods.

3. Indicators:

Once the program purpose (objective) have been established and intended result (outcome), the next step is to identify how to measure progress towards achieving the intended results. There are four common indicators that are relevant for most activities:

- Amount of money leveraged from other sources
- Number of persons, households, businesses, units or beds assisted
- Income level of persons or households by: 30%, 50%, 60% or 80%
- Race, ethnicity and disability data

A successful performance measurement system is tailored to the specific goals and objectives of the program. To meet its obligation to assess program performance, HUD requires grantees to provide information on their achievements and investments since program objectives and activities are determined and implemented locally.

C. 2012-2013 Action Plan Projects:

1. Program Administration

Activity 2012-1

Regulatory Citations: 24 CFR Parts 92.207, and 570.206

Description: Staff salary, planning, and administrative service delivery costs for implementing the Community Development Block Grant and HOME Programs, will be funded through CDBG and HOME awards, as well as local general revenue support.

Funding Amount:	\$38,700	HOME
	\$156,200	CDBG
	\$300,000	General Fund

2. Housing Rehabilitation

Activity 2012-2

Regulatory Citations: 24 CFR Parts 92.205-(a) (1), 570.202

Description: This program is designed to assist very low to low income homeowners with rehabilitating existing housing structures. The primary intent of this activity is to bring units up to code through the provision of rehabilitation activities to eliminate all code violations and provide a decent, safe and sanitary living environment. Program costs incurred may include demolition, construction, permitting fees, surveying, lead abatement, credit reports and closing costs. This activity will target owner occupied homeowners only. Qualified candidates for assistance include homeowners with annual incomes below 80% of the median area income as defined by HUD.

Funding Amount:	\$ 206,837	CDBG
	\$ 140,000	HOME

Performance Measurement

Objective: Providing Decent Housing

Outcome: Affordability

Output Indicators: Number of units rehabilitated Goal: 10

3. Acquisition of Substandard/Dilapidated Properties

Activity 2012-3

Regulatory Citations: 24 CFR Part 570.201 (a), 570.201 (d), 570.201 (i)

Description: Efforts will continue to acquire and demolish substandard and dilapidated properties that continue to blight the 45-Block Revitalization Area. Acquisition will focus on vacant rental properties or vacant parcels; however, the City may need to acquire occupied rental units for the betterment of the community. Relocation assistance will be provided to tenants that are displaced per URA guidelines. Parcels will be recombined for the development of new, affordable housing units. Acquisition costs may include, but not limited to legal fees, appraisal costs and surveying.

Funding Amount: \$150,000 CDBG

Performance Measurement of Acquisition Activities

Objective: Creating Suitable Living Environments
Providing Decent Housing

Outcome: Affordability, Availability/Accessibility

Output Indicators: Number of units acquired **Goal:** 4
Number of households relocated to decent housing

4. Relocation/Displacement Assistance

Activity 2012-4

Regulatory Citations: 24 CFR Part 570.201 (a), 570.201 (d), 570.201 (i)

Description: As part of the West Greenville 45-Block Revitalization plan, efforts will continue to acquire and demolish substandard and dilapidated properties that continue to blight the area. Acquisition will focus on vacant rental properties or vacant parcels; however the City may need to acquire occupied rental units for the betterment of the community. Relocation assistance will be provided to tenants that are displaced per Uniform Relocation Assistance guidelines.

Funding Amount: \$35,000 CDBG

Performance Measurement of Relocation/Displacement Assistance

Objective: Creating Suitable Living Environments
Providing Decent Housing

Outcome: Affordability, Availability/Accessibility

Output Indicators: Number of units households **Goal:** 4

5. Public Service

Activity 2012-5

Regulatory Citations: 24 CFR Part 570.201(e)

Description: The City of Greenville will make available funds to assist nonprofit organizations with approved public services activities. Qualified agencies will participate in projects that benefit City of Greenville citizens. Nonprofit housing and service providers must assist the under-served populations of the City. Applications from nonprofits are submitted to the City for consideration annually and reviewed by the Affordable Housing Loan Committee. The activities will assist low income persons, homeless and special needs persons, youth development, victims of family/domestic violence, and housing providers. All funding will be expended from September 2012 through September 2013.

Activity	Amount
Fair Housing Education	\$ 6,040
Housing Counseling	\$10,000
Job Training/Literacy Volunteers	\$11,960
Youth Development/PAL	\$25,000
Youth Development/IGC	\$15,000
Total	\$68,000

Funding Amount: \$68,000 CDBG

Performance Measurement of Public Service Activities

Objective: Creating Suitable Living Environment

Outcome: Sustainability

Output Indicators: Number of LMI households served Goal: 225

6. Public Facility Improvement

Activity 2012-6

Regulatory Citations: 24 CFR 570-202

Description: This program is designed to assist in the renovation and design of a public park "Dream Park" in the West Greenville Redevelopment area, located near the Greenville Homeless Shelter.

Funding Amount: \$80,000 CDBG

Performance Measurement

Objective: Creating Suitable Living Environment

Outcome: Sustainability

Output Indicators: Number of Park usages Goal: 500

7. Clearance/Demolition

Activities 2012-7

Regulatory Citation 24 CFR Part 570.201(d)

Description: This activity is designed to acquire and demolish substandard structures in the West Greenville 45-Block Revitalization area in an effort to improve the living conditions for low income residents. Parcels may be recombined for the development of new, affordable housing units.

Funding Amount: \$35,000 CDBG

Performance Measurement

Objective: Creating Suitable Living Environment

Outcome: Affordability, Availability/Accessibility

Output Indicators: Number of units acquired **Goal:** 4
Number of units demolished 4

8. Community Housing Development Organization (CHDO) Activities

Activity 2012-8

Regulatory Citations: 24 CFR Part 902.207 (a), (c), (d)

Description: It is anticipated that a certified CHDO will utilize the funding to continue production of single family units for first-time, low-moderate income homebuyers. At the present time, the City has three certified organizations: Metropolitan Housing and CDC, Streets to Home, and Exceed, Inc.

Funding Amount: \$58,000 HOME
\$120,000 Bond Funds

Performance Measurement

Objective: Decent Affordable Housing

Outcome: Affordability

Output Indicators: Number of new single family units **Goal:** 2

9. Downpayment Assistance Program

Activity 2012-9

Regulatory Citations: 24 CFR Part 902.207

Description: Funds available for first time buyers who have completed homebuyer education classes.

Funding Amount: \$40,000 HOME
\$220,000 State & Private funds

Performance Measurement

Objective: Decent Affordable Housing

Outcome: Affordability

Output Indicators: Number of new homeowners **Goal:** 2

10. Economic Development

Activity 2012-10

Regulatory Citations: 24 CFR 570.203

Description: The purpose of the Business Plan Competition is to provide an economic incentive to small business owners and other entrepreneurs both from within and without the redevelopment areas to create or expand small business enterprises within the bounds of West Greenville Redevelopment Areas.

Funding Amount: \$50,000 CDBG

Performance Measurement

Objective: Create Economic Opportunities

Outcome: Availability/Accessibility

Output Indicators: Number of jobs created 3 **Goal:** 4

D. CDBG/HOME Funding Chart

ACTIVITY	HOME FUNDS	CDBG FUNDS	OTHER FUNDS
Administration	38,700	156,200	300,000
Housing Rehabilitation	140,000	206,837	0
Downpayment Assistance	40,000	0	220,000
Relocation	0	35,000	0
Acquisition	0	150,000	0
Clearance/Demolition	0	35,000	0
Community Housing Development Organizations	58,000	0	120,000
Public Service	0	68,000	0
Economic Development	0	50,000	0
Public Facility Improvement	0	80,000	
Program Income	30,000	30,000	0
Total	417,237	811,037	640,000

V. OTHER ACTIONS

A. Affirmatively Furthering Fair Housing

The City continues to fund affirmatively fair housing marketing actions. These actions are inherent to each of the housing activities provided through the Community Development Department. Education of the Fair Housing Laws will occur throughout the year and most specifically during the month of April, which is designated as “Fair Housing Month” and “CDBG Week”. As part of a weeklong celebration of CDBG Week, the City will host a public education forum, tour for Elected Officials, and a Housing Partners Reception. The upcoming fiscal year Fair Housing Month activities will include an educational seminar/forum and quarterly landlord/tenant workshops. Approximately \$6040 CDBG Public Service funding has been budgeted for 2012-2013 Fair Housing Month Education activities to be sponsored by the City’s Human Relations Commission.

During fiscal year 2012-2013, the City will continue to use administrative dollars to fund fair housing activities. The City employs a staff person to coordinate all fair housing and other human relations activities, which is funded with general fund dollars in the approximate amount of \$150,000. The staff person also provides assistance to citizens throughout the year with filing housing complaints.

B. Analysis of Impediments to Fair Housing Choice

An update to the Analysis of Impediments to Fair Housing Choice was completed by the City of Greenville, May 2008. This section presents the Fair Housing Analysis Update for the 2008-2013 Consolidated Plan. It primarily includes existing impediments to fair housing choice currently being addressed and the actions to remedy them. The update relies on public/private information regarding the real estate and banking industries, Greenville housing and community development activities, North Carolina and Greenville Human Relations Agencies, and the Greensboro and Atlanta HUD Offices of Fair Housing and Equal Opportunity.

During fiscal year 2012-2013, the City will complete an update to the current Analysis of Impediments to Fair Housing Choice, in conjunction with a new Consolidated Plan.

In addition, the City will implement the following activities to address identified impediments to current Plan:

1. **Impediment**

Lack of affordable housing forces the lower income population to find alternative housing. Alternative housing may consist of doubling up; where households combine to cut the expenses of housing. Also many are forced to live in housing that is in poor condition that leads to disparate treatment of protected class families and individuals.

Action Plan:

- Provide \$350,000 HOME Investment Partnerships funds to Metropolitan Housing and CDC, Inc. to construct three (3) new affordable units for eligible low income families.
- Provide \$350,000 HOME Investment Partnerships funds to Streets to Homes, Inc. to construct three (3) new affordable units for eligible low income families.
- Make available three (3) new homes previously constructed with HOME Investment Partnerships funds for low income families to purchase or lease.
- Budget \$40,000 in down payment assistance funds for eligible homebuyers.

2. **Impediment**

The lack of education about discrimination and fair housing laws in Greenville. An essential part of fair housing opportunities and enforcement is the education of the public regarding the rights and responsibilities afforded by fair housing laws. This includes the education of housing and financial providers, as well as citizens.

Action Plan:

- Provide bimonthly homebuyer education workshops using CDBG funds to nonprofits agencies, CHDO's and staff for first time homebuyers.
- The City's Fair Housing Officer will moderate the Fair Housing sections at the Homebuyer Education Workshops.
- City Staff will continue to make presentations to church and community groups on housing assistance programs.
- During the 2013 CDBG Week celebration, the City will host a "Housing Fair" for first time homebuyers to give them an opportunity to meet with local financial institutions, realtors, non-profit agencies and other housing advocates. The event is held normally in the target neighborhood.
- Human Relations Commission will sponsor quarterly Fair Housing Education workshops/activities for citizens.

3. **Impediment**

Awareness of fair housing issues is important. Everyone needs to know what may constitute a violation, and what they can do in the event they believe they may have been discriminated against. In addition, it is important for lenders, housing providers and their agents to know their responsibilities and when they may be violating fair housing laws.

Action Plan:

- The City will continue its efforts to educate the public during 2013 Fair Housing Month activities.
- The City will encourage lenders, housing providers and their agents to know their responsibilities and to attend training on fair housing laws.
- The City's Fair Housing Officer will continue to assist citizens with any complaints and make appropriate referrals.

4. **Impediment**

According to the June 17, 2008 Analysis of Impediments report prepared by Training and Development Associates, the lack of a pro-active property maintenance code enforcement program was cited as an impediment to fair housing choice. Substandard housing and low property maintenance contribute to the lack of safe, decent, and sanitary affordable housing. Such a program could help with the preservation of the rental housing stock.

Action Plan:

- The City Code Enforcement Division is proactive citywide in enforcing minimum housing standards and will continue during the upcoming year to work closely with the Housing Division particularly in the West Greenville 45 Block Revitalization Area.
- The City will implement a Rental Rehabilitation program in 2012-13.
- The City in partnership with CHDO agencies will continue to develop affordable rental units.

5. **Impediment**

There are limited housing opportunities for the homeless, those who are at risk of homelessness, and special needs populations. There is not enough funding for permanent housing. Too many citizens are on the brink of becoming homeless because they have to spend too much of their income on housing (many times not decent or safe housing).

Action Plan:

- A City Planner will be assigned as a Staff Liaison to the Continuum of Care, which meets monthly.

- Housing Division staff will participate as committee members for the 2013 “Project Homeless Connect” event. This is a one day event for homeless individuals and families to come and meet with social service, employment agencies, governmental agencies and receive free medical care.
- Housing Division staff will participate in the 2013 “Point in Time” count, which gives a snapshot of the total number of homeless individuals in the Greenville/Pitt County area.
- The City will provide homebuyer education classes using CDBG funds to nonprofits agencies, CHDO’s and staff for first time homebuyers.
- The City Staff will continue to make presentations to church and community groups on housing assistance programs.

6 Impediment

Lack of Access to Homeownership (Based on Home Mortgage Disclosure Act {HMDA} and apparent Predatory Lending Practices)

This Impediment can be addressed in the 2008-2013 Consolidated Plan as the City considers inequities that may occur in homeownership opportunities for protected classes or those covered by the Fair Housing Law.

An analysis of the HMDA data in this document reveals, for example, that while black residents comprise 34 percent of the population, 21 percent of all home purchase mortgage applications come from black families/individuals so therefore, it appears that black applicants may be underrepresented although improving substantially over the past five years. City programs targeted to assist low-moderate income protected classes should focus more closely on educating the population on the importance of homeownership and how to access local lending resources.

In addition, consistently high denial rates on home improvement loans may reflect policies in the lending industry, but this is an area that warrants some attention in Greenville. The disinvestment associated with an inability to raise funds to maintain one’s home can have an undesirable effect on the community when it occurs in great numbers.

Action Plan:

- Provide \$350,000 HOME Investment Partnerships funds to Metropolitan Housing and CDC, Inc. to construct three (3) new affordable units for eligible low income families.
- Provide \$350,000 HOME Investment Partnerships funds to Streets to Homes, Inc. to construct three (3) new affordable units for eligible low income families.
- Make available three (3) new homes previously constructed with HOME Investment Partnerships funds for low income families to purchase or lease.

C. Affirmative Marketing Policy

In accordance with the regulations of the HOME Program and in furtherance of the City of Greenville's commitment to fair housing and equal housing opportunity, this Policy establishes procedures to affirmatively market rental or residential units constructed or rehabilitated under the HOME Program. These procedures are designed to assure that individuals who normally might not apply for available housing units because they are socially and/or economically disadvantaged are provided an opportunity to apply.

This Affirmative Marketing Policy is documented and maintained in the Housing Division files, and shall be included in all HOME project proposals and agreements and HOME project files. The Beneficiary is held to the terms of the Policy by the requirement in the applicable HOME Subrecipient or HOME/Community Housing Development Organization ("CHDO") Agreement.

It is the policy of the City of Greenville, Housing Division not to discriminate against any person on the basis of race, color, national origin, sex, religion, familial status, or disability:

1. In the sale or rental of housing or residential lots;
2. In advertising the sale or rental of housing;
3. In the finance of housing;
4. In the provision of real estate brokerage services; or
5. In the appraisal of housing.

Please see **Appendix H**.

D. Minority/Women Business Outreach

It is the policy of the City of Greenville to provide minorities and women equal opportunity for participating in all aspects of the City's contracting and procurement programs, including, but not limited to, construction, projects, supplies and materials purchases and professional and personal service contracts.

E. Evaluation and Reduction of Lead-Based Paint Hazards

Lead poisoning is one of the worse environmental threats to children in the United States. While anyone exposed to high concentrations of lead can become poisoned, the effects are most pronounced among young children.

All children are at higher risk to suffer lead poisoning than adults, but children under age six are more vulnerable because their nervous systems are still developing. At high levels, lead poisoning can cause convulsions, coma, and even death. Such severe cases of lead poisoning are now extremely rare, but do still occur. At lower levels, observed adverse health effects from lead poisoning in young children include reduced intelligence, reading and learning disabilities impaired hearing and slowed growth.

An important initiative emanating from HUD in the last decade is the reduction of lead-based paint hazards, and many jurisdictions around the country have made a concerted effort to reach this goal. The federal Residential Lead-Based Paint Hazard Reduction Act of 1992 (Title X of the Housing and Community Development Act of 1992) amends the Lead-Based Paint Poisoning Prevention Act of 1971, which is the law covering lead-based paint in federally funded housing. These laws and subsequent regulations issued by the U.S. Department of Housing and Urban Development (24 CFR Part 35) protect young children from lead-based paint hazards in housing that is financially assisted or being sold by the federal government.

In all property rehabilitation projects undertaken by the City of Greenville, the City will assess whether lead-based paint might be present and, if so, follow the guidelines set forth in the Residential Lead-Based Paint Hazard Reduction Act of 1992, Title X of the Housing and Community Development Act of 1992 (Title 24, Part 35 of the Code of Federal Regulations).

The City of Greenville is committed to testing and abating lead in all pre-1978 housing units assisted with federal grant funds in any of the housing programs implemented. Currently, the City of Greenville has contracted with an agency to provide all lead testing and clearance activities. This agency has also agreed to provide training for the housing rehabilitation contractors.

F. Anti-Poverty Strategy

City of Greenville housing programs inherently address poverty by creating housing opportunities for low income households. Without these housing opportunities many low income households would not be able to afford housing rehabilitation costs or to purchase a home.

Additionally, funding through CDBG Public Service activities of transitional housing providers such as the Streets to Home and EXCEED, both nonprofit agencies, allows individuals that would normally reside in impoverished conditions the opportunity to establish themselves in order to find suitable employment. Such efforts will work to reduce the number of persons currently living in poverty.

G. Developing Institutional Structures

The City of Greenville, through its Housing Division, the network of housing subrecipients and Community Housing Development Organizations (CHDOs), are effectively organized to utilize all the funding received through the various state/federal programs.

The private sector is provided with incentives for developing affordable rental housing through tax credits provided by the federal tax credit program. Tax credits provide developers with an additional state subsidy for low income apartment construction.

In addition, each year efforts are made to work with local institutions to provide housing and economic opportunities for low income persons through public service activities and participation in the Pitt County Continuum of Care. The Pitt County Continuum of Care began in 2001 and has successfully grown into a well-balanced organization made up of local government agencies, housing providers, service providers, and other interested groups. The development of the continuum and participation by the City of Greenville will greatly enhance coordination between these agencies. The Public Housing Authority has also joined the Continuum of Care and has begun working in concert with the City of Greenville and our revitalization efforts in the West Greenville 45-Block Revitalization Area.

The City of Greenville will continue to coordinate with other governmental agencies, nonprofit organizations, private enterprises and individuals to provide increased opportunities for the target area.

H. Public Housing

There are four Public Housing managing agencies in the Pitt County area, which include Greenville Housing Authority with a total of 779 units; Mid East Commission who manages a total of 135 units in three towns; Farmville Housing Authority who manages 174 units and Ayden Housing Authority who manages 175 units. Each of the mentioned Public Housing Authorities receives federal funds to modernize and repair public housing units.

In addition, the City of Greenville Community Development Department Housing Division has formed a partnership with the Greenville Housing Authority to offer bimonthly Homeownership and Financial Literacy classes to public housing residents and other citizens. So far, three former residents utilizing the Housing Choice Voucher program and City of Greenville HOME downpayment assistance program have purchased a new home, developed by a local Community Housing Development Organization.

I. Recapture Provisions

In accordance with the applicable homebuyer recapture/resale provision outlined in 24 CFR Part 92.254, City of Greenville has adopted the recapture provision for its HOME-assisted homeownership projects. All CHDO's, subrecipients and all entities who administer HOME programs will follow recapture provisions that have been adopted by the City of Greenville. The City requires the recapture of its HOME-funded homeownership housing assistance from net sales proceeds when the original homebuyer sells the property during the affordability period. Net proceeds are the funds remaining from the sale of the property by the original homebuyer less the repayment of the outstanding balance on any superior mortgage, sales commission, the original homebuyer's downpayment and the cost of any property improvements made by the original homebuyer. To the extent that net proceeds are available at closing, all or a portion of the HOME funds are due and payable. In the event of foreclosure, the Lender may not require the Borrower to repay an amount greater than the net proceeds available after the foreclosure sale. The recapture provision is enforced through execution of a Declaration of Deed Restrictions, which identifies the period of affordability, primary residency requirement, and term and conditions required when using the recapture provision.

Listed below are the recapture provisions for all HOME and CDBG funded programs with maximum amounts of assistance available for the activity. Assistance may be in the form of deferred loans or amortized loans.

- Homebuyer assistance may be used for downpayment assistance and/or principal mortgage reduction via Secondary Mortgage. Borrower's income cannot exceed 80% of the area median income adjusted by family size as published annually for Greenville. Maximum loan amounts of up to \$20,000 (20% of sales price of home with cap of \$20,000). Loans will be amortized over a fifteen-year period.
- Housing Rehabilitation Assistance will be offered to persons/families with incomes up to but not greater than 80% of the area median income adjusted by family size and as published annually for Greenville. For households with incomes less than 50% of the area median income, a 10 year deferred loan will be offered up to \$60,000 for rehabilitation assistance. For households with incomes from 51% to 80% of the median area income, the combination of a deferred payment loan and a no interest loan is available. Deferred loans are forgiven at a rate of 10% each year and no-interest loans are amortized over 10 years. In no case may the assistance exceed \$60,000 unless special circumstances exist that warrant exceeding the maximum price and approval of the City Manager is granted.

- Assistance provided to nonprofit agencies through the CDBG Program will be secured with a subrecipient agreement/contract. Should the agency fail to comply with program rules, the assistance will be recaptured.

Recaptured HOME funds by Community Housing Development Organizations (CHDO), on behalf of City of Greenville, are not considered to be CHDO proceeds but shall be used by the CHDO's to provide affordable housing for City of Greenville. Not more than 10 percent of recaptured funds may be used for CHDO administration.

Recaptured HOME funds provided by an agency other than a CHDO, will be recaptured by City of Greenville to be used for eligible HOME activities in accordance with the requirements of the HOME statute and regulations, in the same manner as program income. Not more than 10 percent of the recaptured funds may be used by the City for administrative or planning costs.

The recapture provision will ensure that each HOME assisted unit will remain affordable for a period of time determined by the recapture schedule below, established in accordance with 24 CFR 92.254(a)(4):

HOME Funds Provided	Period of Affordability
Less than \$15,000	5 years
\$15,000 - \$40,000	10 years
More than \$40,000	15 years
New Construction	20 years

J. Section 3 Requirements

Section 3 of the Housing and Urban Development Act of 1968, as amended (12 U.S.C. 1701u) (Section 3) requires the Community Development Department to ensure that employment and other economic and business opportunities generated by the Department of Housing and Urban Development (HUD) Section 3 financial assistance, to the greatest extent feasible, are directed to public housing residents and other low-income persons, particularly recipients of government housing assistance, and business concerns that provide economic opportunities to low and very low income persons.

It is the policy of the Community Development Department of the City of Greenville to require its Contractors to provide equal employment opportunity to all employees and applicants for employment without regard to race, color, religion, sex, national origin, disability, veteran's or marital status, or economic status and to take affirmative action to ensure that both job applicants and existing employees are given fair and equal treatment. See Section 3 Plan attached.

VI. MONITORING PLAN

City of Greenville will continue to improve its established monitoring system of CDBG, HOME and other housing and community development activities to ensure regulatory compliance. Monitoring is the responsibility of the City of Greenville Community Development Department Housing Division, to include but not limited to:

Monitoring Objective

Primary -To ensure that subrecipients are -

- Complying with all applicable federal requirements
- Complying with administrative and financial management standards
- Performing and delivering services in a timely manner

Secondary -To identify any potential areas of non-compliance and offer technical assistance.

Monitoring Procedure

- In-house reviews of subrecipient materials & regulations review
- Pre-monitoring visits with subrecipient
- Conduct visit as follow:
 - Notify of date, scope, focus of review
 - Hold entrance conference with chief official
 - Document, gather & analyze
 - Hold exit conference to report results, hear reaction & form conclusions
- Follow-up with letter of results to include findings and/or concerns.

On-Site Visits

Staff performs on-site monitoring reviews at least annually, depending on the assessment of risks for non-compliance. Program operations are observed, staff interviewed, client eligibility confirmed, financial and programmatic reports verified.

Long-Term Compliance

Activities involving real property acquisition or improvement require long-term compliance with original purpose of the federal assistance. City of Greenville Community Development Department maintains a CDBG Real Property Inventory that is updated annually, and confirms that such property is still being used for the intended purpose. City also carries out an annual review of HOME-assisted rental units, to ensure compliance with Housing Quality Standards, tenant eligibility, and rent ceilings.

Rental Housing Monitoring

Staff must review annual Project Compliance Reports and perform regular on-site visits throughout the affordability period to ensure continued compliance with:

- Rent and occupancy requirements
- Property standards
- Other Federal requirements (fair housing, lead-based paint, affirmative marketing, etc.)

HOME Program Monitoring Schedule

Active Funded CHDO's	Contact Person	Quarterly Monitoring Visit	Quarterly Monitoring Visit	Quarterly Monitoring Visit	Quarterly Monitoring Visit
Farmville Housing Development Corporation	Dean Corbett	Lease / purchase Week of March 12, 2012	Lease /Purchase Week of July 9, 2012	Lease/Purchase Week of October 8, 2012	Lease / Purchase Week of January 7, 2013

HOME Downpayment Assistance

Annual Compliance Review (Affordability Period)	Contact Person	Annual Monitoring Visit
Verification of Recipient Compliance	In House / letters sent	Week of August 5, 2012

Quarterly Review Outstanding Projects

Consortium Members with Outstanding Projects	Contact Person	1 st Quarter Monitoring Visit	2 nd Quarter Monitoring Visit	3 rd Quarter Monitoring Visit	4 th Quarter Monitoring Visit
Town of Grifton	Joe Albright	Week of March 12, 2012	Lease / Purchase update Week of July 9, 2012	Lease / Purchase update Week of October 8, 2012	Lease / Purchase update Week of January 7, 2013

Annual Compliance Review

Annual Compliance Review (Affordability Period)	Contact Person	Annual Monitoring Visit
Town of Ayden	Sherri Scharf	Week of June 17, 2012
Town of Farmville	Theresa L. Cieslinski	Week of June 17, 2012
Pitt County	Jonas Hill	Week of June 17, 2012
Town of Winterville	Terri Parker-Eakes	Week of June 17, 2012

CHDO'S

Annual Compliance Review (Affordability Period)		Contact Person	Annual Monitoring Visit		
Farmville Housing Development Corp.		Dean Corbett	Week of June 25, 2012		

Active Funded CHDO's	Contact Person	Monitoring Visit Close out of Prior Year Funding	Quarterly Monitoring Visit	Quarterly Monitoring Visit	Quarterly Monitoring Visit
Streets to Homes	Aaron McConnell	Week of March 26, 2012	Week of June 11, 2012	Week of September 10, 2012	Week of December 10, 2012
Metropolitan Housing & CDC	Jonathan Moore	Week of April 12, 2012	Week of June 18, 2012	Week of September 17, 2012	Week of December 17, 2012

**Community Development Block Grant
Monitoring Schedule**

Active Subrecipient	Contact Person	Monitoring Visit Date
North Carolina Rural Fund for Development	Linda McKnight	March 9, 2012
Boys & Girls Club of Pitt County	Jay Faron	March 7, 2012
Building Hope Community Life Center	Rob Lee	March 27, 2012
Center for Family Violence Prevention	Diana Lucas	March 15, 2012
L.I.F.E. of NC (STRIVE)	Joyce Jones	March 13, 2012
EXCEED	Carlton Gay	March 29, 2012
Pitt County : 10YR Plan to End Chronic Homelessness	Paulette White	March 29, 2012
Operation Sunshine	Barbara Ormond-Davis	March 28, 2012

VII. STRATEGIES TO ELIMINATE HOMELESSNESS

A. Continuum of Care

Since 2001, the City of Greenville has actively assisted with the creation and development of a Continuum of Care for Pitt County. The group, known as the Pitt County Continuum of Care, is devised of City and County staff, as well as non-profit and for-profit representatives. The group meets monthly to discuss the ever-growing homeless population in our community. Efforts to end homelessness and to coordinate supportive services to homeless persons are top priorities for the community. The January 2012, a Continuum of Care Homeless Population Point in Time Survey revealed that there are 106 homeless persons in Pitt County. Currently, Pitt County has 100 emergency beds and 28 transitional housing units available to serve them.

During the upcoming 2012-2013 fiscal year, the group will continue to develop the Continuum and prepare various grant applications for submission to the NC Balance of State. To date, the Pitt County Continuum of Care has received funding every year since 2003 funding cycle. Funding received under the 2004 and 2005 award was allocated to implement a Homeless Management Information System (HMIS). All actions by the Continuum of Care group will address obstacles to meet the underserved needs in the community, assist with the reduction of poverty level families, assist with the development of “institutional structures”, and enhance coordination between public and private housing and social service providers. Other actions will include marketing of the continuum to reach out to surrounding communities in an endeavor to promote regional participation.

B. Ten-Year Plan to End Homelessness

The City of Greenville, Pitt County Government, United Way and other nonprofit agencies formed a partnership in 2008 to hire a professional consultant to assist the community with developing a Ten-Year Plan to End Chronic Homelessness in Pitt County. The Plan was approved October 2008 by the Greenville City Council and Pitt County Commission. The goals and objectives are as follow:

GOAL 1

Provide community-based services and support to prevent homelessness before it happens and diminish risks for homelessness to recur.

■ **Outcome 1-A**

Increased access to services provided to the homeless population.

■ **Outcome 1-B**

Increased number of individuals who are employed and able to manage their personal finances.

■ **Outcome 1-C**

A comprehensive client-centered discharge planning process coordinated among community agencies for individuals leaving foster care, mental health facilities, jails and prisons, medical facilities, and military units who are at risk for homelessness.

■ **Outcome 1-D**

A data infrastructure (HMIS) that would link all services, screen for program eligibility, and gather data needed to monitor (assess) progress of implementation.

GOAL 2

Create adequate short-term housing options and supportive permanent housing for those who are chronically homeless or at risk of becoming homeless.

■ **Outcome 1-A:**

Increased inventory of housing options that meet the needs of individuals and families who are homeless and those at risk of becoming homeless.

Both local governments and nonprofit agencies are now in the process of implementation. The City Council approved in September 2008 a two year contribution of CDBG funds in the amount of \$30,000 per year to fund implementation activities. During fiscal year 2012, CDBG program will fund SOAR Training, which strives to access disability benefits for homeless people and those at risk of homelessness who are living with disabilities; and a “Project Connect” event. The Project Homeless Connect event is a one day event which provides community and medical services in one location for homeless residents. In January 2011, over 200 persons received services.