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APPENDIX

## CR-05 - Goals and Outcomes

## Background

The CAPER (Consolidated Annual Performance Evaluation Report) is a document that assesses the progress made in the expenditure of Community Development Block Grant (CDBG) funds during Fiscal Year 2016-2017 to support programs that support Santa Fe’s affordable housing, public service and economic development initiatives. The City of Santa Fe, as an entitlement grant recipient of CDBG funds, is required to report to the United States Department of Housing and Urban Development (HUD) on accomplishments and progress toward the 2013-2017 Consolidated Plan Goals via the CAPER for each recently completed fiscal year. This report also highlights additional accomplishments supporting Consolidated Plan goals through the City’s own matching activities funded by the Affordable Housing Trust Fund (AHTF).

**Progress the jurisdiction has made in carrying out its strategic plan and its action plan. 91.520(a)**

As noted in the 2013-2017 Five Year Consolidated Plan, Santa Fe is a desirable place to live for a variety of reasons.  Over the years, as second home owners and retirees relocate here, real estate values continue to rise with the cost of land remaining prohibitive for building homes.  Another challenge in retaining affordable housing is that there is a sizable percentage of older homes that are often more expensive than newer, entry-level homes, making it difficult to maintain a stock of affordable housing.  These factors have contributed to the policies and incentives put forth by the City Council to develop, maintain and improve affordable housing.  To this end, the City has deployed substantial resources and dedicated programming toward affordable housing including:

* **Santa Fe Homes Program (SFHP)**. SFHP is the City’s inclusionary zoning program, codified in SFCC-26.1. It requires all residential developments include a percentage of affordably-priced units which is calculated based on a homebuyer or renter paying no more than 1/3 of their monthly income toward their housing costs, including utilities. For single-family owner occupied homes, 20% of new homes must be priced affordably and 15% of rental units. The incentives for this program are a 15% density bonus to the site’s underlying zoning, waivers for hook up fees and reductions for building permit fees. When affordable homes are sold to income-certified homebuyers a lien is placed on the home as an affordability control. If the home is sold or transferred, the lien is recycled to another income-certified buyer or repaid to the City. The funds are deposited in the City's AHTF.

In 2016, the ordinance was amended to allow multi-family rental developers to pay a fee based on an “affordability gap” calculation (market rent – affordable rent). The exemption sunsets in 2020 when the requirement will revert back to providing units on site. Revenues collected from multi-family projects will be placed into the Affordable Housing Trust Fund (AHTF).

* **Affordable Housing Trust Fund (AHTF).** The AHTF is funded through development revenues, fees paid by developers, pay off of City-held liens, and land sales from Tierra Contenta. Residents of moderate income below 120% of Area Median Income (AMI) are considered eligible for assistance. Funds are disbursed according to the NM Affordable Housing Act and used to support down payment assistance, home repair, rental assistance, and other projects related to the preservation, construction or creation of affordable housing.
* **CDBG-Funded Down Payment Assistance**. During the 2016-2017 Program Year, $132,083 was spent on two Down Payment Assistance (DPA) programs, with the goal of funding 12 loans for mainly first-time home buyers. Program Income was generated from the DPA programs in the amount of $163,278.74 which allowed for a total of 31 homebuyer loans to be funded from this program.
* **Affordable Housing Trust Fund (AHTF)-Funded DPA:** Funds were not made available from the AHTF during the program year due to a lack of revenue into the account. However, the AHTF is a proven source of support for DPA. In 2015 this program offered down payment assistance (DPA) loans through three non-profit organizations:  Habitat for Humanity, Homewise and The Housing Trust. These loans reduced the price of the home loan and a lien is placed on the property in the City’s name so that the funds will be repaid to the City once a home is sold and then reallocated, allowing the City to retain the funds.
* **HUD-funded Rental Assistance**. For multiple years, the City of Santa Fe has been a HUD grantee for homeless assistance funds through the Shelter Plus Care/Continuum of Care program. The City contracted with local housing providers who administered the rental assistance directly to very-low income renters and those with disabilities. At one time, the City received over $1.2 million from HUD which was disbursed to three subrecipients: Housing Trust, Life Link and St Elizabeth Shelter. When HUD modified the regulation to allow current nonprofit subrecipients to become the direct grantee, the City turned over six of its eight grants (five to Life Link and one to the Housing Trust). Once the current multi-year grants are in the Continuum of Care renewal cycle, the remaining two grants will also be turned over.
* **Rental Assistance from Local Funds.** In the 2014-2015 Program Year, $150,000 of the AHTF was spent on rental assistance which served 49 households or 114 individuals For FY 2015-2016, $60,000 of unused general funds from FY 2014-2015 were added to the program to ensure that vulnerable renters did not lose their housing; however, since then the City cut its general fund budget for affordable housing by 25%. The Office of Affordable housing is working to re-establish this vital funding source. For the 2016-17 budget year, the City’s Finance Department is hoping to allocate $100,000 from an anticipated budget surplus; however, at this time the funds have not yet been secured.
* **CDBG-funded Homeowner Housing Rehabilitation.** $60,000 of CDBG funds was granted to Habitat for Humanity for rehabilitation of eight (8) single-family residences targeted towards homeowners earning below 60% of the AMI. Through the year, however, Habitat used funds to provide emergency repairs for very low income homeowners, primarily elderly, single female-headed households and assisted 16 homeowners through the program. The Homewise Home Improvement Program generated close to $85,000 in program income, in addition to the $12,000 of entitlement funds. HUD requires that program income is spent before entitlement funding can be used which enabled Homewise to almost triple its original goal of assisting 6 homeowners and serve a total of 21 households over the course of the year.
* **AHTF-funded Homeowner Housing Rehabilitation:** Funds were not available from the AHTF during the program year, so no progress is reported. Because the income limit is higher for AHTF (120% of AMI), the program works well in conjunction with CDBG which has a cap of 80%AMI. When possible, the City strives to provide both types of funding to reach as many low- and moderate-income people as possible.

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| **2016-2016 Projects** | **CDBG Entitlement (EN)** | **Unspent Balance** | **Proposed Outcomes** | **Actual Outcomes** |
| **Kitchen Angels** | $20,000 | $0 | 30 new individuals | 216 new individuals and 683 ongoing |
| Narrative: Provide nourishing, home-delivered meals to chronically ill and homebound residents, increasing the projected new clients served in the contract from 30 to 216. A total of 683 clients were served for the year exceeding goals for a third year in a row. Of the total households served, 184 were female-headed. | | | | |
| **Habitat for Humanity Home Rehab** | $60,000 | $0 | 6 households | 16 households |
| Narrative: Provided necessary emergency funds to LMI, elderly homeowners; all 17 are single, female head of household. | | | | |
| **Youth Shelters and Family Services (YSFS)** | $20,551 | $0 | 500 youth | 412 youth |
| Narrative: Provided increased hours of both street outreach and case management services to homeless youth. All reported in IDIS provided ethnicity data, though 81 identified as “unknown”. Of the total actually served, 133 youth are female and are considered head of household. | | | | |
| **Adelante Elementary School Liaison** | $20,198 | $291.95 | 400 students | 440 students |
| Narrative: Continued providing services to the families of students experiencing homelessness, including referral to social services, additional food, clothing and academic help. | | | | |
| **Youth Works Facility Improvement** | $26,000 | $0 | 500 youth | 974 youth |
| Funds were used to replace the roof at the organization’s main office where services are provided to runaway, disconnected and/or homeless youth. The roof repair will enable the installation of solar panels, which is part of an overall upgrade to increase the building’s energy efficiency and bring down energy costs. | | | | |

Table 1 summarizes all programs funded with CDBG money in 2016 and shows targeted versus actual outcomes, including the categories of housing projects, public service activities and public facility improvements. These summaries also include data not previously reported on for female-headed household and disability categories as a requirement of HUD Fair Housing and Equal Opportunity. A total of 355 beneficiaries of female-headed households were reported and broken down by project in Table 1. No disabilities were reported as served amongst the 10 projects.

**Table 1. Program Year 2016 Evaluation**

**Table 1: Program Year 2015 Evaluation – Cont.**

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| **2016-2016 Projects** | **CDBG Entitlement (EN)** | **Unspent Balance** | **Proposed Outcomes** | **Actual Outcomes** |
| **Homewise Home Improvement** | $15,000 (entitlement)  $84,649 (program income) | $8,835.19  $0 | 7 households | 9 households |
| Narrative: Funding provided home improvement loans to homeowners below 80% AMI; excess program income will be re appropriated in PY 2017. Average loan of $16,265 per household. Of the total served, 2 were female-headed households. | | | | |
| **Homewise DPA** | $138,278.74 | $0 | 6 DPA loans | 21 DPA loans |
| Narrative: Funding supported DPA loans of up to $20,000 for 6 first-time home buyers; an additional 14 homes were funded with Program Income that was generated and utilized for DPA loans. Average loan of $16,123 per household. Of the total households served, 3 were female-headed. | | | | |
| **The Housing Trust DPA** | $120,000 (entitlement)  $29,000 (program income) | $0  $0 | 5 – 7 DPA loans | 10 DPA loans |
| Narrative: Ten loans were provided with entitlement funding (7) and three with program income. Average DPA loan was $13,786 per household. Of the total households served, 3 were female-headed. | | | | |
| **St Elizabeth Casa Familia Shelter Remodel** | $50,000 | $27,840 | 275 | 238 |
| Funds were allocated to expand and remodel the front office space of the family emergency shelter for homeless single women and families; secure the residents’ living/sleeping area; reconfigure staff offices for client consultation privacy. Unanticipated requirements from the City’s code enforcement division delayed the start of construction (additional permits were needed which required approval from one of the City’s land use boards) and added costs to the project as modern code requires the building be outfitted with sprinklers for fire safety. In July 2017, the Community Development Commission allocated an additional $10,000 to cover the sprinkler cost, extending the project into the current year. | | | | |
| **Legal Aid Foreclosure Counselling** | $10,000 | $7,059 | 22 | 6 |
| The project proposed to assist 22 households in active foreclosure; only 6 were assisted, possibly a reflection of Santa Fe’s recovering economy and housing market. | | | | |

**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.

**Table 2:Goals and Outcomes**

|  |  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- | --- |
| **Goal Name** | **Start Year** | **End Year** | **Category** | **Geographic Area** | **Needs Addressed** | **Potential Sources of Funding** | **Goal Outcome Indicator** | **Actual Outcomes** |
| I. Reduced rate of households with cost burden and corresponding drop in poverty rates for homeless and those in danger of becoming homeless *(Increase Opportunities for At Risk Populations; Address Current and Emerging Needs)* | 2015 | 2016 | Affordable Housing Public Housing Homeless | Citywide | Emergency Shelters; Support Services for Homeless or People At Risk of Becoming Homeless; Rental Rehabilitation; Affordable Housing Non-Homeless Special Needs | CDBG; AHTF; CoC; Low-Income Housing Tax Credit (LIHTC); RAD; HOME; MFA Development Funds; Foreclosure Prevention Funds (HAMP: Home Affordable Modification Program, PRA: Principal Reduction Alternative etc.) | Rental units constructed; Tenant-based rental assistance/Rapid Re-housing; Overnight/ emergency shelter/ transitional housing beds added; Homeless Prevention; Homeowner housing rehabilitated; Housing for homeless added | CDBG: 440 total students served by Adelante’s elementary school liaison; 683 total chronically-ill served with 216 new clients (Kitchen Angels); 412 homeless youth served with street outreach and case management); 974 youth provided tutoring, job readiness, counseling, referral to services (Youthworks); 412 youth living on the street reached and provided services, food, referrals (Youth Shelters) |

***Table 2:* Goals and Outcomes *– cont.***

|  |  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- | --- |
| II. Inventory of rental units and vouchers expanded to meet increased demand *(Increase Affordable Housing Opportunities)* | 2015 | 2016 | Affordable Housing | Citywide | Rental Vouchers; Rental Rehabilitation; Provision of Rental Units and Support Services for LI/VLI Renters; Non-housing Community Facilities and Services; Fair Housing Outreach | CDBG; AHTF; CoC; LIHTC; RAD | Rental units constructed; Rental units rehabilitated; Tenant-based rental assistance/ Rapid re-housing; housing for homeless added | S+C: 22 individual tenants served with rental assistance funds; Outreach about renters rights and fair housing laws provided through Tino the Tenant distributed at local outlets and through SFPS. |
| III. Increased homeownership opportunities *and* support for long-term affordability and accessibility for current homeowners *(Increase Affordable Housing Opportunities)* | 2015 | 2016 | Affordable Housing/Non Homeless Special Needs | Citywide | Down Payment Assistance; Homeowner Rehabilitation; Diversity in Housing Types; Home buyer Training and Counseling; Fair housing Outreach; Support for Current Homeowners | CDBG: AHTF Shelter Plus Care; LIHTC; RAD | Homeowner housing added; Homeowner housing rehabilitated; Direct financial assistance to homebuyers; Jobs created; | CDBG: 31 Down Payment Assistance Loans (21 Homewise, 10 Housing Trust); CDBG: 25 home improvement loans (16 Habitat, 9 Homeiwse); foreclosure assistance services provided to 6 HH (Legal Aid) |

***Table 2:* Goals and Outcomes *– cont.***

|  |  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- | --- |
| IV. Housing Opportunities reflect emerging needs, changing demographics and are aligned with redevelopment projects, economic development objectives and sustainability goals *(Address Current and Emerging Needs; Increase Opportunities for At-Risk Populations)* | 2015 | 2016 | Affordable Housing | Citywide | Non-Housing Community Facilities and Services; Diversity of Housing Types | CDBG AHTF MFA Dev’t Funds HOME; Enterprise Green Community New Market Tax Credits | Public Facility or Infrastructure Activities other than Low/Moderate Housing Benefit; Public Service activities | Facility improvements supporting 975 youth (Youthworks) as energy efficiency improvement project.  Approx.. 238 women and children served at St. Elizabeth’s Casa Familia Shelter |

**Narrative:**

**Goal I:** Reduced rate of households with cost burden and corresponding drop in poverty rates for homeless and those in danger of becoming homeless *(Increase Opportunities for At Risk Populations; Address Current and Emerging Needs).* For CDBG-funded Public Service Activities Adelante served 440 Santa Fe Public Schools homeless or at risk of becoming homeless students and their families which exceeded the proposed (400) for a third year in a row. Kitchen Angels proposed serving home-delivered meals to Santa Fe’s lower-income chronically ill, homebound residents to 30 new clients and exceeded the goal by adding a total of 216 clients for a total of 683 clients. Youthworks provided tutoring, job training and placement and other referral services to 974 disconnected, homeless and/or at risk young people. The street outreach program reached 412 youth living on the street and provided basic medical care, food, clothing and referral services.

**Goal II:** Inventory of rental units and vouchers expanded to meet increased demand *(Increase Affordable Housing Opportunities):* Shelter Plus Care (SPC) assistance was used to support 12 units at the Village Sage and Stagecoach Apartments for people transitioning out of homelessness and four units at the Siringo Senior Apartments were also supported. As was the case last year, no new rental inventory was expanded utilizing CDBG funds in this program year. The Housing Trust’s proposed project for the Las Soleras subdivision, Las Soleras Station was awarded subsidy through the Low Income Housing Tax Credits (LIHTC) program and will begin construction in the upcoming year. While not funded in 2017, planning continues for the Arts+Creativity Center for up to 50 LMI live/work apartments sited on a parcel of city-owned land and an application will be submitted for LIHTC for the 2018 award.

**Goal III:** Increased homeownership opportunities *and* support for long-term affordability and accessibility for current homeowners *(Increase Affordable Housing Opportunities).*Down Payment Assistance (DPA) exceeded overall program goals, as both Homewise and the Housing Trust were able to use program income to provide a total of 31 DPA loans, compared to the 11 proposed in their applications. Goals for home improvement were also exceeded: Homewise supported 9 projects (7 proposed) and Habitat repaired 16 homes (8 proposed). Part of the reason for Habitat’s highly successful outcome is that the funds are used increasing for smaller cost projects that address basic and emergency repairs, serving a preponderance of older, fixed-income households. For strategic plan goal titled “refinancing services and support for current homeowners”, the city was under contract in 2015-2016 with New Mexico Legal Aid who provided homeowner foreclosure assistance which assisted 6 homeowners, rather than the 22 proposed, and only expended about 30% of funding allocated to the project. This underperformance is likely a reflection of Santa Fe’s improving economy and housing market. Lastly, for strategic plan goal titled “construction of affordably-priced homes for homeownership”, CDBG funding was not allocated toward this goal as no funding applications were made for construction.

**Goal IV:** Housing Opportunities reflect emerging needs, changing demographics and are aligned with redevelopment projects, economic development objectives and sustainability goals *(Address Current and Emerging Needs; Increase Opportunities for At-Risk Populations):* Facility improvements to the Youthworks office that replaced its aging roof is part of a long-term energy-efficiency overhaul for the building which served 975 youth over the program year. Similarly, the facility upgrades at the Casa Familia shelter will increase security, safety and functionality of the space to improve overall program performance. For the 2016-17 year, 238 women and children were provided shelter, food, clothing, counseling and referral services.

|  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- |
| **Prior Year and Current Year Programs In Progress as of 6/30/2017** | | | | | | | | | | | | | | |
| **2014 and 2015** | **Homewise Rehab (Activity ID 291)** | | | **Starting Balance** | | **$ Unspent** | | | **Minimum Per Contract** | | | | | **Total # Loans** |
| 2014 Original Allocation (Entitlement Funding) | | $40,000 | | | $40,000 | | | 3-6 units (current extended 2014 contract) | | | | | 0 units |
| 2014 Program Income | | $6,332 | | | $188,082 | | | 4 units |
| 0 units |
| 2015 Program Income/Revolving Loan | | $188,082 | | | **$80,980** | | | 9 units |
| 2014 EN Re-appropriation | | $40,000 | | | **$40,000** (to reprogram) | | | N/A |
| **Ending Balance of EN and PI** | | **$120,980** | | | | | | **6-12 units** | | | | | **24 units \*** |
| **Narrative:** The success of this program over time continues to generate program income to fund additional units beyond those proposed. A portion of the remaining $80,980 will continue to fund more home improvement loans into 2016. The $40K of EN funding that was re-appropriated through FYE 2015 remains entirely unspent due to the excess of program income generated and will be re-programmed to current year rehab projects and CDBG Program Administration where needed. \*An additional 10 units were served in 2015 for 24 total. | | | | | | | | | | | | | |
| **2014and 2015** | **Homewise Down Payment Asst. (Activities 287, 304)** | | | | | | | **$ Unspent** | | | **Minimum Per Contract** | | **Total # Loans** | |
| Original Allocation | | | | $40,000 | | | $35,555 | | | 2-4 loans (2014 contract) | | 0 loans | |
| 2014 PI (287) | | | | $39,134 | | | 0 | | | 12 loans | |
| 2014 EN Re-appropriation | | | | $40,000 | | | **$35,555** (to reprogram) | | | 1 | |
| 2015 EN (304) Re-appropriation - contract extension | | | | $89,750 | | | **$89,750** | | | 5 loans | | 0 | |
| 2015 Program Income/Revolving Loan | | | | $165,066 | | | $0 | | |  | | 13 | |
| **Ending Balance of EN and PI** | | | | **$125,305** | | | | | | **9-11 loans** | | **26 loans** | |
| **Narrative:** The success of this program over several years has generated program income to fund additional units beyond those proposed. 2014 and 2015 EN remains unspent due to the excess of program income generated. Remaining PI from Homewise’s Rehab Program is eligible to fund 2016 DPA loans if needed. The remaining $35K will be reprogrammed to current year rehab projects and CDBG Program Admin where needed. | | | | | | | | | | | | | |
| **2014and 2015** | **Housing Trust DPA (Activities 290, 305)** | | | | | |  | | | **Minimum Per Contract** | | **Total # Loans** | | |
| Original Allocation (290) | $60,000 | | | | | $0 | | | 5-7 loans (2014 contr.) | | 3 loans | | |
| 4 | | |
| 2015 EN (305) | $100,000 | | | | | $3,500 | | | 5-7 loans | | 5 | | |
| 2015 Revolving Loan Program Income | $33,500 | | | | | $0 | | |  | | 2 | | |
| **Ending Balance of EN and PI** | **$3,500** | | | | | | | | **10-12 loans** | | **14 loans** | | |
| **Narrative**: Goal of 5-7 loans was met for 2015; remaining $3,500 to be reprogrammed in 2016. | | | | | | | | | | | | | |

***Table 3:* Programs in Progress and Balances**

NOTE: The City’s final financial report is not yet available. This page will be updated as soon as the final reports are created and this page will be replaced before the end of the public review and comment period.

**Narrative: Program Income (PI) Reuse**

As reported in the 2016 CAPER, the City of Santa Fe receives quarterly reports from sub-recipients’ activities on all accomplishments, which include the detail on program income generated, for those applicable. The activities that the City has funded with CDBG Entitlement funds in past years that have generated program income are loans to individual homeowners administered by sub-recipient organizations for Down Payment Assistance (DPA); loans to homeowners administered by sub-recipient organizations for Home Improvement (HI); and small business economic development loans in repayment from the 2011 Santa Fe’s Small Business Loan Fund (SFBLF). PI is funded by a repaid loan when a home is sold, where the original down payment assistance is revolved dollar-for-dollar back into the program to fund more loans, as in the case of the Housing Trust. Alternatively, PI is also funded by principal, interest, late fees and loans due upon sale that have been paid off over the course of the program year, as in the case of Homewise’s two programs.

Pursuant to the definition of program income located at 24 CFR 570.489, these activities include the following:

* Sale, lease, rental proceeds of property acquired with/improved by CDBG funds; and
* Principal and interest payments on loans made from CDBG funds; and
* Proceeds from sale of CDBG loans or other obligations; and
* Interest earned on funds in a revolving loan fund account or on program income, pending reuse

Just as in the previous year, the City funded two (2) DPA programs that generated program income: Homewise and The Housing Trust, as well as a Home Improvement project via Homewise in a contract extended from 2014. Table 3 illustrates the status of Program Income-generating projects, where contracts have been extended into the current program year, with corresponding loan totals demonstrating where accomplishment goals have been met or exceeded due to program income being recycled back into projects for which a sub-recipient is under a CDBG-funded contract with the City to provide.

Program Income totals are reported by the applicable sub-recipients to the CDBG Administrator on a quarterly basis each program year. They are subsequently recorded and drawn in HUD’s Integrated Disbursement & Information System (IDIS) by quarter, and verified and closed out, where applicable, by the Fiscal and Program Year end of June 30, 2017. Included in these reports are the number of loans funded and the dollar amount of the funding that occurred for the quarter. DPA and HI activities are receipted back to the IDIS Activity ID that generated the funding, except in the cases where program income is transferred between CDBG-eligible programs for which the sub-recipient is under CDBG contract to provide with the City. The exception to this rule is program income that is receipted in IDIS and is labeled as Revolving Loan (RL), which is only used for the program that generated it. Furthermore, IDIS does not permit draws for any other CDBG activity other than that which generated those recorded as the revolving loan type of program income.

Per HUD regulations, the PI is drawn first prior to EN funds when the City processes vouchers for reimbursement. To ensure the regulations are met, upon receipt, the PI is immediately drawn down and recorded to that activity, with the number of loans funded noted in the receipt function. Table 3 shows the activity that occurred in the 2016-2017 program year for sub-recipients’ DPA and HI activities that are still open with activity, along with their corresponding sub-recipient contracts that the City has pre-authorized to continue via time extension amendments. This table also shows both the PI and EN expenditures and corresponding accomplishments that occurred in the prior year.

As CDBG-funded client loans are paid off to the sub-recipient, principal and interest is collected and held by the sub-recipient, and reported back to the CDBG program. The PI generated by Homewise generates bank interest that is held in an interest bearing account, with total proceeds reported and remitted back to the City on an annual basis, and thus, reported and remitted back to the Federal Government (HUD) on an annual basis. In the 2016-2017 program year, $29 was remitted back to the City which was then paid back to the federal treasury on behalf of HUD.

The CDBG entitlement regulations at 24 CFR 570.504(b) stipulate that at the end of each program year, a grantee (City), or its sub-recipients *may not* have PI on hand in an amount that is more than one-twelfth of the most recent grant amount. For FY 2016-2017, one-twelfth of the grant amount would require that the grantee or its sub-recipients may not have retained more than $42,496. The Revolving Loan classification of program income generated is exempt from this requirement. This is beneficial because the City has to record, or receipt, program income on a quarterly basis, which then must be drawn. It further enables the sub-recipient to retain and manage their own program income, keep it on hand, and deploy based on the demands of the loan pipeline. Alternatively, and less desirably, if those funds were remitted, they would come back to the city, whereby the funds would be sent on to the federal treasury to be placed in the City’s CDBG line of credit, only to be re-allocated back to the same projects, a costly and time-consuming administrative procedure.

**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** |

|  |  |
| --- | --- |
| **Race/Ethnicity** |  |
| White | 1802 |
| Black or African American | 79 |
| Asian | 5 |
| American Indian or American Native | 123 |
| Native Hawaiian or Other Pacific Islander | 2 |
| Multi-racial | 93 |

|  |  |
| --- | --- |
|  |  |
| **Total** | **2104** |

|  |  |
| --- | --- |
|  |  |
| Hispanic | 1308 |
| Not Hispanic | 707 |

*Table 4* – Table of assistance to racial and ethnic populations by source of funds

**Narrative**

The racial and ethnic composition reported for CDBG program sub-recipients represents cumulative annual data collected that represents a total 2,104 individuals and/or households. The actual families assisted apply to grantees where household counts apply, such as for DPA or home improvement. As a requirement of the Professional Services Agreement with the City, each sub-recipient reports the racial, ethnic, and demographic data to the City on a Quarterly basis.

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

**Identify the resources made available ‘**

|  |  |  |  |
| --- | --- | --- | --- |
| **2016 Source of Funds** | **Source** | **Expected Amount Available** | **Amount Expended During Program Year** |
| CDBG | HUD | $796,804.70 | $669,823.95 |
| Other | Affordable Housing Trust Fund (AHTF) | $0 | $0 |
| Other | City’s General Fund: Youth and Family Services Division, SF Community Services | $800,000 | $712,000 |
| Other | Shelter+Care | $189,000 | $128,798 |
| Other | General Fund/Office of Affordable Housing | $355,000 | $355,000 |

*Table 5* – Resources Made Available

**Narrative**

Within the 2013-2017 Consolidated Plan cycle to date, HUD has committed a total of $2,084,682 in CDBG EN funding for years 2014, 2015, 2016 and 2017. The City committed $412,000 through the AHTF for housing projects beginning in July 2015 all of which was spent. For FY 2017-2018, an additional $400,000 was allocated to support downpayment assistance, home repair, and emergency shelter repair.

For other contributions within Youth and Family Services, the amounts available and expended include all youth programs including the Monica Roybal Center and the Carlos Ortega Teen Center.

For the 2016-2017 Program year, the City of Santa Fe administered a total of $128,798 through two (2) Shelter Plus Care grants administered by The Housing Trust and St. Elizabeth’s Shelter. General funds in the amount of $355,000 were administered through the Office of Affordable Housing to support homebuyer training and counseling services, income-certification for the Santa Fe Homes Program and various professional services, including partially funding the Analysis of Impediments and update of the Housing Needs Analysis.

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

|  |  |  |  |
| --- | --- | --- | --- |
| **Target Area** | **Planned Percentage of Allocation** | **Actual Percentage of Allocation** | **Narrative Description** |
| N/A | N/A | N/A | N/A |

Table 6 – Geographic distribution and location of investments

**Narrative**

In any given program year, the City of Santa Fe does not prioritize allocating funds and supporting programs geographically, due to the City's lack of population density relative to its size. For the past two program years, no single Census Tract was earmarked for serving its LMI population. Concentrated poverty and/or racial characteristics are not reflected on the census tract level, making it difficult to effectively target resources based on location.  Instead, the City focuses programs on the household income or an identified characteristic of the participants and/or recipients of assistance.   For example, down payment assistance is provided based on the homebuyer's income rather than the location of the home.  Likewise, public service programs for at risk youth serve the citywide population, rather than those youth living in a specific census tract. This description has been reported in previous years and that priority remains. However, on occasion, a project proposal will be accepted because allocating funds at that site will also serve other community development goals.

**Leveraging**

**Explain how federal funds leveraged additional resources (private, state and local funds), including a description of how matching requirements were satisfied, as well as how any publicly owned land or property located within the jurisdiction that were used to address the needs identified in the plan.**

The City of Santa Fe's model of service delivery is to pass through most federal funds to sub-grantees, who provide the services.  This ensures that services are furnished in the most efficient and relevant manner possible.  The sub-recipients are then able to leverage additional programming and project funds, including Low-Income Housing Tax Credits (LIHTC) IHTC, HOME (when applicable), ESD, CDFI, as well as funds allocated though the state's Mortgage Finance Authority.

## 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 (CDBG and Other Programs) | Actual |
| --- | --- | --- |
| Number of Homeless households to be provided affordable housing units | 176 | 161 |
| Number of Non-Homeless households to be provided affordable housing units | 60 | 0 |
| Number of Special-Needs households to be provided affordable housing units | 40 | 0 |
| **Total** | **276** | **161** |

*Table 7*- Goals: Number of Households

|  | One-Year Goal (CDBG and Other Programs) | Actual (CDBG and Other Programs) |
| --- | --- | --- |
| Number of households supported through Rental Assistance | 875 | 900 |
| Number of households supported through Rehab of Existing Units | 15 | 31 |
| Number of households supported through Acquisition of Existing Units | 1-2 | 0 |
| **Total** | **881** | **931** |

*Table 8* - Outcomes: Number of Households Supported

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

Goals: The one year goal of providing affordable housing units to otherwise homeless individuals was not represented in any CDBG-funded projects for 2014, 2015, or 2016. However, several organizations offer permanent supportive housing units for homeless including: 12 units at Village Sage and Stagecoach Apartments (partially funded through Shelter Plus Care grants administered to the Housing Trust), 24 units at La Luz (Life Link), 28 units at Casa Cerrillos (St Elizabeth), 8 units at Sonrisa (St Elizabeth), 8 units at Siringo Senior Apartments (St Elizabeth), 45 through Linkages (La Luz), and 18 units for youth (Youth Shelters). Furthermore, the number of Homeless Households as 1,430 was not discussed in the 2013-2017 Consolidated Plan although the plan states that Shelter+Care, Continuum of Care and Rapid Rehousing funding supports approximately 900 units (or “Homeless Households”) annually, out of which 16 units are directly supported through Shelter Plus Care grants administered by the City.

The data reported in next goal of non-homeless households to be provided affordable housing units represents CDBG and AHTF funds that are used for down payment assistance for households up to 80 percent AMI for CDBG. The goal for the year was 12 and 31 were provided through the combined funding sources of entitlement funding and program income. The last one-year goal concerning special needs households is not referenced in the Consolidated Plan, so no actual goal is applicable.

Outcomes: The number of households supported through rental assistance was substantially less than the prior years because six of the City’s HUD Continuum of Care grants were turned over to the subrecipients (Life Link and the Housing Trust). The City retained management of two of its Shelter+Care grants that will both complete their fifth year of funding during the upcoming fiscal year. Santa Fe Community Housing Trust funds approx. 12 units at Stagecoach Apartments and Village Sage Apartments and St. Elizabeth’s Shelter supports four of its units at the Siringo Senior Apartments.

This next outcome is represented in the total number of households supported through rehab of existing, owner-occupied units funded by CDBG and AHTF. The Consolidated Plan cites a one year goal of 10 units. Three contracts were administered by the City: two with Homewise and one with Habitat for Humanity a total goal of 15 homes. This outcome was exceeded with a total of 31 homes rehabilitated, primarily by Habitat for Humanity, as there was a high demand for this service from low-income senior households with most under 60 percent AMI.

CDBG funds were not allocated for special needs households in the 2016 program year.

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

Outcomes will certainly impact future CDBG and AHTF funding allocation considerations from down payment assistance and public facility improvements, to emerging needs for rental assistance of all categories, such as emergency assistance for battered households, special needs, homelessness prevention, and rapid rehousing. Depending on the future award and timing of LIHTC for rental housing projects, CDBG funds will be aligned with LIHTC-awarded projects, and geared towards supporting these projects for land acquisition, rehabilitation, or other eligible expenses.

**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 Persons Served** | **CDBG Actual** |
| Extremely Low-income | 2,116 |
| Low-income | 157 |
| Moderate-income | 75 |
| Non low-moderate income | 21 |
| **Total** | **2,369** |

*Table 9* – Number of Persons Served

A total of 2,369 persons were served, of which 2,348 or 99% were below 80% of Area Median Income (AMI)

## 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:**

For direct street outreach,Youth Shelters and Family Services provides to areas where youth congregate. On any given night, the organization estimates that 100 youth may be homeless on the streets of Santa Fe. In addition to street outreach, services provided to homeless youth include an emergency shelter serving youth ages 10-17 that can stay up to 90 days. YSFS also offers transitional living and counseling. Special initiatives are the Pregnant and Parenting Project, including referrals, case management, parenting skills and donated items and the ACCESS Program, which helps youth with job readiness skills. Youth can stay at the emergency shelter for up to 30 days and in the transitional, apartment style living program for 18 months.

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

**St. Elizabeth.** St. Elizabeth Shelter operates two emergency shelters, one two-year transitional supportive housing program and two permanent supportive housing programs. Its Men’s Emergency Shelter has 28 year-round beds along with a library, TV room, laundry, showers and intensive case management. The organization also offers longer term and transitional shelter options. *Casa Familia* has 10 beds for single women, eight rooms for individual families, and can accommodate up to 30 people, depending on family size. It also has a TV/play room, dining room, laundry and donations room where clothing and toys are available for guests.  Both emergency shelters provide respite care for those who are in need of a place to recover from illnesses and behavioral health issues and both have a program manager, case managers and supervisory staff.  *Casa Cerrillos*  is a permanent housing program with 28 apartments for adults with disabilities, many with co-occurring substance abuse problems.  Siringo Apartments is a permanent housing program with eight apartments for seniors.  *Sonrisa Family Shelter is a transitional housing program* with eight apartments for families with children.  It has a two-year stay limit within which time families are expected to have overcome the issues leading to their becoming homeless and have saved enough funds to successfully move in to housing of their own.    All three supportive housing programs have on-site program/case managers that work closely with each guest and monitor their progress.

**ROC/Interfaith Shelter.** Several faith based organizations support a seasonal shelter from November to May through meals, showers and laundry, in addition to beds and also some case management services. The Resource Opportunity Center is open two days per week, serves 120 to 140 people per day, and offers more intensive case management and legal services.

**Life Link.** Established in 1987 in a motel, Life Link has evolved into a highly effective behavioral health and supportive housing center. At *La Luz*, 24 apartment units and an additional 74 City wide scattered-site units are provided to people with mental illness and other co-occurring disorders, based on the permanent supportive housing model. Life Link provides extensive outpatient treatment, pyscho-social rehabilitation, homeless prevention and rental assistance, peer support services and onsite healthcare screening.

**Esperanza***.* Esperanza is a full service organization offering counseling, case management and advocacy for survivors of domestic violence. It operates a shelter that can house up to 42 people, as well as 21 beds of transitional housing to allow clients establish independence while still receiving supportive services. The organization also offers comprehensive non-residential counseling services.

**Shelter Now.** Several services providers with a focus on homeless youth came together in the fall of 2016 to create a shelter program for youth experiencing homelessness. The coalition consisted of YouthWorks, Adelante, Youth Shelters. Through partnerships with several area churches, 8 – 20 youth were provided a warm, safe place to sleep during the winter months. The location rotated weekly between different churches. The host church would provide meals cooked by church volunteers who would also play board games and cards with the youth. A staff person was in attendance during the course of the night. Transportation to the site was provided and the City made showers available at one of its community centers. The coalition proposes to continue the program in upcoming years.

**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**

In addition to ensuring the availability of a range of housing program options for these homeless populations, the City also ensures a range of social service program options for homeless individuals, families, veterans and unaccompanied youth. The goal is to increase access to health, education, employment, and housing support services.  These services include behavioral health counseling for adults and youth, dental healthcare for individuals and families, independent living skill training for homeless youth, and early childhood development and education for homeless families.

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

As reported in the 2016 Action Plan, the City passed a resolution in 2014 directing staff to convene meetings with service provider agencies; and thereafter, analyze and report back to the governing body. The follow up report broke down needs for short term and long term goals. Overall, the long term report details feedback from the service provider community that one-stop services provided by the Life Link and Health Care for the Homeless work well with managed care organizations (MCO’s), such as Molina and PMS. What is needed is a more coordinated assessment process to reach the highest-need people more quickly and to get ID cards for participants so that they can better transition back into society by obtaining services and accessing employment. Another great need is transportation for client participants from shelter to services. Additionally, a campus approach, which would address physical/behavioral health, and transitional housing is being researched by staff and service provider organizations. Creative architecture could allow for spaces to be designed for persons with different needs levels and therefore, accomplish the provision of services to people who will not engage because of concerns for their safety around other homeless populations, such as the needs of shorter-term homeless, which may include women and families, versus longer-term, chronically homeless with substance and/or mental health issues. This approach would require additional revenue that needs to be identified, such as, for example, an additional excise tax on liquor to support treatment, and an additional tax on business licenses to support housing.

Concerted efforts have been made to expand the safety net of services in Santa Fe. In 2010, the city allocated CDBG and Affordable Housing Trust funds to *Faith at Work* which provided 3 months of emergency rent/mortgage assistance to 62 families, preventing immediate eviction and default. Of these families, 53 percent were extremely low-income, earning less than 30 percent AMI. Between July 2014 and June 2015, 28 families received emergency rent/mortgage assistance through *Esperanza Shelter’s* Emergency Assistance Program (EAP), all of whom were female-headed household with household incomes in the 30 –50 percent AMI range. With CDBG support, Kitchen Angels continues to deliver and increasing number of meals each year to homebound and terminally ill residents.

In 2014, the City allocated $150,000 from the AHTF to support a pilot rental assistance program, administered through Life Link that served 49 households. The funds provided immediate rental assistance to families and individuals at risk of being homeless, including rent payments, rental arrears, utilities, and deposits. General funds were also used in the following fiscal year to continue program. Staff hopes during FY 2017-2018 a budget surplus will allow another rental assistance program to be funded through local funds.

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

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

The Santa Fe Civic Housing Authority (SFCHA) is the public housing agency in Santa Fe. As previously reported, it oversees 490 units of public housing, and manages 670 Section 8 vouchers in Santa Fe.  There are a total of 369 units for seniors and 121 units for families. Currently, 399 people are on the public housing waiting list, and 171 people on the Section 8 Voucher waiting list for Santa Fe. SFCHA receives approximately 35 applications per month for public housing. The application window is closed when 400 are reached. With only 6 to 8 families and/or individuals coming out of the program each year, new openings are extremely limited.

Newly refinanced properties are being systematically renovated to address long-term deferred maintenance issues. They will likely move towards site-based or site-driven wait lists, which better supports applicants so that the Authority doesn’t have to turn an individual or family down because of location, school district or other limiting factors, and to avoid having to send an individual or household back down to the bottom of the list again.

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

The Santa Fe Civic Housing Authority continues to run the Family Self-Sufficiency Program which supports residents and voucher holders to place funds in escrow to achieve home ownership and educational goals.

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

The PHA is not designated as troubled.

## 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)**

Disproportionately, those who are most heavily cost-burdened, have the lowest incomes. The City of Santa Fe is reviewing its policies and practices to mitigate barriers to housing development--particularly affordable housing development. A review of city housing policies and land use and zoning regulations has identified concerns in 2016, namely stakeholders raising concerns about inconsistent and unpredictable development approval decisions and “NIMBYism” affecting approvals. According to stakeholder interviews and private sector focus groups there is a stigma associated with affordable housing developments and neighborhood associations make strong efforts to impede affordable development.

 In 2014 the City prepared several outreach materials regarding housing laws including the Federal Fair Housing Act, the New Mexico Uniform Owner Resident Relations Act (UORRA) and the NM Mobile Home Act.  Often non-English speakers are further affected by not being aware of the rights and protections to which they are entitled under these laws. The outreach materials consist of Fair Housing Frequently Asked Questions brochures in English and Spanish and a tenant rights “Novella”, both in Spanish and English with ongoing distribution throughout the year. They were distributed predominantly in Spanish-speaking and lower income neighborhoods as well as through school liaisons with the Santa Fe Public Schools and community facilities throughout the City along with the CAPER.

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

As reported, the projects that were funded and executed through CDBG and local funds increase the availability of affordable housing to low and moderate income households. Furthermore, the City has actively supported the development of three LIHTC multi-family properties with CDBG funds and through the donation of City-owned land. Two are leased up (120 units total) and one will begin construction during the upcoming year (87 units). All of the properties address the needs of people transitioning out of homelessness, renters with special needs and very low incomes by offering 25% of their units at rents affordable to those earning 30%AMI and less.

The 2016 Analysis of Impediments to Fair Housing Choice was completed during the program year and calls for identifying high opportunity areas in which to develop mixed-income housing and create more multi-family housing. The study also calls for examining land use policies and zoning districts to alleviate institutional and structural barriers to the distribution of affordable housing. Another need is to provide ongoing landlord/renter resources. Toward the effort of affirmatively furthering fair housing, the City will also be reviewing and revising policies again in the new template, in the 2017 Assessment of Fair Housing (AFH) publication which will be completed in September of 2017.

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

As reported in the Consolidated Plan, there is a repair need of older homes in Santa Fe. The CDBG-funded Home Improvement project showed that there was a concentration of homes in the 87505 area code and was split amongst census tracts. In 2014-2015, two out of the five homes served by this project were built prior to 1978. The sub-recipients reported that no paint was disturbed in either of those projects, so no remediation was conducted.

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

As part of an anti-poverty strategy, the City has worked toward implementing the following:

* Establish priorities for allocating federal tax credits to mixed income rental developments where at least 25% of the rental units will be affordable to households earning less than 50 percent of the AMI;
* Fund a local housing voucher program to provide assistance to the homeless and near homeless;
* Modify the Santa Fe Homes Program (SFHP) so that the rental requirement is relevant to the housing needs in the community;
* Work with for-profit and nonprofit organizations to develop on new multifamily, mixed income rental property using Low Income Housing Tax Credits where feasible;
* Identify all existing affordable rentals and develop a preservation plan as needed;
* Support construction and lease up of Las Soleras Station, an 87-unit project planned for the southwest sector of town that was awarded tax credits in the 2017 application round and will be constructed by the Santa Fe Community Housing Trust. The land was donated by the City and leveraged through a Santa Fe Homes Program Agreement with the single family home developer of an adjacent parcel. 25% of the units are reserved for renters transitioning out of homelessness and/or renters earning less than 30%AMI.
* Support tax credit award, construction and lease up of the Arts + Creativity Center, a 60 unit project, planned for a parcel of city-owned land that will serve primarily 30-60% AMI renters, in conjunction with a small number of market rate units. The affordable live/work spaces are intended to support entrepreneurial creative and maker businesses and the project will include community space for retail, performance and exhibitions. The project did not receive LIHTC funding in 2017 but will resubmit an application in 2018.

Given the City's high rate of cost burden, even for homeowners, it is apparent that continued focus on rehabilitation, home repair, and other support services is essential to alleviating poverty in Santa Fe.  Specific programs that reduce the number of poverty level of families are:

* Conserve and maintain Santa Fe's existing housing stock in residential neighborhoods;
* Continue to support rehabilitation loan programs targeted toward low to moderate income homeowners (30 to 80 percent AMI), which includes home renovations, emergency repairs and energy conservation measures including the purchase of new appliances, retrofits, and solar water heaters;
* Support the SFCHA's RAD conversion project to renovate 120 public housing units.

The City of Santa Fe has always supported Public Service Programs through the City's Community Services Department as well as CDBG funding for eligible public services activities. The Human Services Division awards over $700,000 annually to various non-profit organizations who provide the basic services of emergency shelter, accessibility to food and crisis services.  Organizations must have a physical location in the City and/or the County of Santa Fe and provide direct services to the community. The Human Services Committee sets the human services program priorities each year depending on the most significant need.

The Children and Youth Commission funds non-profit and public school programs that serve children from birth to 21 years of age.  The Commission conducts an annual community needs assessment to determine emerging needs.  Contracts are awarded in the areas of early child care and education, healthy living, environmental education, youth leadership and meaningful work experience, and supplemental educational programs for students in the Santa Fe Public Schools, of whom 75% are eligible for subsidized meals.  The commission awards approximately $1 million per year to these organizations.

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

The City of Santa Fe continuously carries out the priorities in the *2013-2017 Consolidated Plan* by collaborating with non-profit partners.  The City's philosophy is to help build the capacity of community-based service providers, rather than to increase the size of the City's bureaucracy.  The City and its staff serve as advocates and coordinators for its partner nonprofits.  Another strength of this service delivery model is that a wide array of services is provided with little overlap because of the coordination between City departments as well as between the City and nonprofit partners.  This cooperation ensures that services reach those in most need, including homeless families and individuals and those in danger of becoming homeless – veterans, senior citizens, victims of domestic violence, very low-income renters, at risk youth – and people with special needs and disabilities.

**Identify actions taken to overcome the effects of any impediments identified in the jurisdictions Analysis of Impediments to Fair Housing Choice (2016). 91.520(a)**

The most recent Analysis of Impediments (AI) to Fair Housing Choice, completed in 2016, is a HUD-mandated review of impediments to fair housing choice in the public and private sector. The AI is required for Santa Fe to receive federal Housing and community development block grant (CDBG) funding.

According to HUD, impediments to fair housing choice are:

* Any actions, omissions, or decisions *taken because of* race, color, religion, sex, disability, familial status or national origin that restrict housing choices or the availability of housing choices.
* Any actions, omissions or decisions that *have the effect* of restricting housing choices or the availability of housing choices on the basis of race, color, religion, sex, disability, familial status or national origin.

The AI examines the following:

* A review of a city’s laws, regulations, and administrative policies, procedures and practices;
* An assessment of how those laws, policies and practices affect the location, availability and accessibility of housing; and
* An assessment of public and private sector conditions affecting fair housing choice.

Major findings from the 2016 AI will be updated and enhanced through the 2017 Analysis of Fair Housing, including:

* Lack of affordable, housing located throughout Santa Fe is a major challenge and disproportionately affects some residents, especially individuals who need supportive services (persons with mental illness, persons with disabilities), persons with disabilities transitioning out of institutions and nursing homes, and other residents with relatively low incomes (new immigrants, refugees).
* The ability to use Section 8 assistance is segregated to specific locations and not utilized in more expensive parts of town.
* Lack of case management or supportive services can create barriers to housing choice because 1) residents needing services paired with housing may not be able to live in all areas of the city, and 2) case managers can be critical in helping residents with special needs assess housing.
* The HUD provided Opportunity Indices show that Hispanic populations experience some of the lowest access to opportunity, particularly in the low poverty, school proficiency and labor market indexes. The indicators in Santa Fe that are of most concern are poverty and school proficiency, both of which show considerably low access to opportunity.
* According to stakeholders and residents, lack of access to opportunity is affected by infrequent public transportation services to higher opportunity neighborhoods and destinations outside of core service areas (e.g., county social services office), limited hours and days of operation of some routes, lack of holiday service, etc.
* Access to opportunity barriers are created by lack of well-paying and stable job opportunities.

The city’s efforts to address barriers have focused on improving access to fair housing information, enhancing resident knowledge of fair housing rights and empowering residents to take action when they perceive a fair housing violation. These efforts have included:

* Preparation of outreach materials regarding housing laws including the Federal Fair Housing Act, the New Mexico Uniform Owner Resident Relations Act (UORRA) and the state Mobile Home Act. The outreach materials consist of Fair Housing Frequently Asked Questions brochures in English and Spanish and a tenant rights “Novella,” both in Spanish and English called “Tino the Tenant”/"Tino el Inquilino", a story about a tenant who shares his own discrimination experiences with a group of acquaintances. Distribution is ongoing throughout the year predominantly in Spanish-speaking and lower income neighborhoods as well as through school liaisons with the Santa Fe Public Schools and community facilities throughout the city.
* In March 2016, the city hosted a fair housing consultant funded by the HUD Fair Housing Initiatives Program (FHIP) grant. This training was attended by 19 individuals representing several non-profit housing service providers in Santa Fe. The city also co-sponsored a training with the New Mexico Finance Authority for nonprofit partners; 30 people attended.
* The Office of Affordable Housing has reached out to the Santa Fe Public Schools to establish a distribution plan for fair housing materials. City staff met with the Communities and Schools New Mexico School Outreach Coordinators of 11 schools at their annual retreat to present fair housing activities and distribute literature. The OAH conducted an outreach campaign to educate the public about affordable housing and fair housing issues continues to distribute the Fair Housing Frequently Asked Questions brochure in Spanish along with the "Tino el Inquilino" (“Tino the Tenant”) Novella. Distribution is an ongoing effort to public schools, public libraries, city facilities, private non-profits and bilingual local businesses.
* The City of Santa Fe has committed funding or matched resources (meeting facilities), conditional on finalized budgets, to fair housing consultants to conduct fair housing training for lenders and apartment managers.

## 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**

**CDBG Program Monitoring Requirements and Frequency**

The CDBG Administrator, in charge of the CDBG program, monitors program service providers, or sub-recipients funded by CDBG to ensure compliance with requirements through site inspections and documentation of organizational structures, with applicability to HUD national objectives and scope of work.  The City of Santa Fe utilizes HUD’s following guides to ensure compliance:

* “Guidebook for Grantee’s on Sub-recipient Oversight”,
* CPD Monitoring Handbook
* “Managing CDBG”
* “Ensuring CDBG Sub-recipient Timeliness Guidelines”
* CFR 570 Federal Regulation governing CDBG and including Part 58 governing Environmental Reviews
* Davis Bacon fair wage resources via the Department of Labor

Additionally, the Office of Affordable Housing attends technical assistance trainings in monitoring, sub-recipient oversight and fair housing throughout the year.

**Committee Meetings**

The Community Development Commission (CDC) is the advisory body to the City of Santa Fe Mayor and City Council on CDBG funding allocation decisions and priorities in adherence to the 2013-2017 Consolidated Plan. The staff liaison for the CDC is also the CDBG Administrator and is responsible for coordinating, advertising and publishing the Consolidated Plan, Action Plan and CAPERs. The CDC reviews Housing Needs Assessment updates, Analysis of Impediments to Fair Housing updates, and the upcoming Assessment of Fair Housing in 2017.

**Site Visits**

By the time this report is submitted to HUD, site monitoring  visits will have been conducted on seven of ten sub-recipient projects completed in the program year: Homewise (Home Improvement Project); Homewise (Down Payment Assistance); The Housing Trust (Down Payment Assistance); Habitat for Humanity (Home Improvement Project); Youth Shelters and Family Services (Street Outreach); Adelante (Middle School Liaison service project); Kitchen Angels (Meal preparation and delivery for chronically ill);

In the site visits, staff members meet with the leadership team of the particular non-profit sub-recipient, and review selected files for accuracy based on the guiding regulations and documents. Both deficiencies and accomplishments are noted  at the time of monitoring and by follow up letters which outline corrective actions to be taken to achieve effective, efficient program delivery.

**Reporting and Fiscal Management**

Staff ensures that all sub recipients keep detailed records for the Performance Measurement System to evaluate the effectiveness of the project in meeting the needs of targeted populations.  Relevant data include the number of clients served, income and employment (locally and with the City depending on the program), assets breakdown (when appropriate) and Performance Measurement data by project type (Housing, Economic Development, Public Service or Facilities & Improvement), ethnicity and age breakdown.

This information is submitted quarterly and input into the Integrated Disbursement and Information System (IDIS) with data finalized prior to program closeout and reporting in the Program Year CAPER.  The reports track completion of the contracted scope of services and track program demand and utilization by demographic category for services provided by the program.  The sub-recipient’s program manager also must submit audits and/or audited financial statements which include a breakdown of the expenditures and revenue (including Program Income if relevant) and a specific description of the charges as defined in the contract.  The City requires these within ninety (90) days of project completion and considers time extensions under extenuating circumstances. The CDBG Administrator from the Office of Affordable Housing is responsible for reviewing and approving the sub recipient’s account payment requests (invoices) and then submitting the request to the City's Accounts Payable Department for payment. The Administrator also uses a checklist to ensure current documents required by the City and by HUD are received from the sub-recipient, and withholds invoices for payment where necessary until the most current documentation is received.

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

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

The CDBG Citizen Participation Plan, as approved by HUD, requires that Santa Fe residents be given adequate time – a minimum of 15 days – to review the City’s use of CDBG funds as well as holding a Public Hearing at a regular City Council meeting for public comment. For the public comment opportunity, the Office of Affordable Housing published two display ads in Spanish and English on Monday, August 28 and Friday, September 1, 2017 in the Santa Fe New Mexican, soliciting written public comment. The document was made available from August 28 through September 11, 2017 - at the following locations:

* **Southside Library** (6599 Jaguar Drive)
* **The Main Library** (145 Washington Ave.)
* **City of Santa Fe Office of Affordable Housing** (500 Market St)
* **Santa Fe City Hall** (200 Lincoln Avenue-City Clerk)
* **Genoveva Chavez Community Center** (3221 Rodeo Rd)

To comply with the HUD Public Hearing and Public Comment requirements on the 2016 CAPER, the City Clerk published an official notice for public hearing in the Santa Fe New Mexican Legal Section to advertise the Public Hearing held on September 27, 2017.

The CAPER is made available to the public for review along with other internal committee reviews within the timeline below:

City Finance Committee: September 11, 2017

City’s Community Development Commission: September, 20, 2017

Public Hearing, City Council: September 27, 2017

**Citizen Comments**

Citizens have three options to participate. They may participate by attending public meetings, submitting written comments to the Office of Affordable Housing, and may testify at public hearings. All CDBG proposed projects go through the Community Development Commission public meeting advertised on the City’s website and printed in the City’s weekly meeting notice distributed to all City offices. All CDBG contracts represented in the CAPER were reviewed by the City Finance Committee prior to the start the funding year of July 1, 2016, and were advertised on the City’s website. Finally the projects were reviewed and represented within the 2016-2017 Annual Action Plan document, at the City Council Public Hearing, which was advertised in the Santa Fe New Mexican.

## 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.**

There are no changes.

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

No.

**APPENDIX A**

HUD Reports: Integrated Disbursement Information System (IDIS)

* PR 03 CDBG Activity Summary Report for 2016
* PR 05 Activity Summary by Activity
* PR 10 CDBG Housing Activities for 2016
* PR 23 CDBG Summary of Accomplishments
* PR 26 CDBG Financial Summary Report
* PR 83 Sections 1/2/3 CDBG Performance Measures Report

Advertisements:

Notice of Public Hearing published September 27, 2017

Affidavit of Publication for Public Hearing

Public Review Legal Ads:

August 2

August 5, 2016

Service Provider Comments

Public Review/Citizen Written Comments (none for 2016)

Loans and Other Receivables

City Council Public Hearing DRAFT Meeting Minutes of August 31, 2016

Public Hearing Sign-Out