

City of Carrollton Consolidated Annual Performance and Evaluation Report for Program Year 2022

Revision: November 20, 2023

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CR-05 - Goals and Outcomes

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

This could be an overview that includes major initiatives and highlights that were proposed and executed throughout the program year.

The Consolidated Annual Performance and Evaluation Report (CAPER) represents the fourth year completed under the Carrollton's 2019-2023 Consolidated Plan. This report represents October 1, 2022, through September 30, 2023. The objective of Carrollton's CDBG Program is to support activities which meet at least one of the primary national Community Development Block Grant (CDBG) objectives, i.e., development of viable urban communities by providing a suitable living environment, decent housing, and expansion of economic opportunities for persons of low- and moderate- income. Based on the needs analysis in 2014, the following strategy areas were identified and are reaffirmed in this annual report.

- <u>Improve Neighborhood Infrastructure:</u> Use of CDBG funds to leverage infrastructure improvements.
- <u>Enhanced Code Enforcement:</u> Use CDBG funds to pay for one salaried code enforcement officer to work in the CDBG target area.
- <u>Provide Neighborhood Enhancement Matching Grants:</u> Use general funds to create a more proactive municipal contribution to preserve and enhance neighborhoods throughout the city.
- <u>Preserve Existing Housing Stock:</u> Use CDBG and general funds to provide interior and exterior home repairs for homeowners who qualify for the grants.
- <u>Assist Social Service Providers:</u> Use General Funds and CDBG funds for the enhancement of services to meet the needs of low- to moderate- income citizens.

In March 2020 the COVID-19 virus was defined as a pandemic and affected every aspect of the population in the United States. The Centers for Disease Control (CDC) documented COVID-19 virus hit African-American, Hispanic, and other minority groups at a higher rate. Due to the pandemic the United States Federal Government on March 27, 2020, passed the Coronavirus Aid, Relief, and Economic Security Act, also known as the CARES Act. CARES Act funding distributed by the U.S. Department of Housing and Urban Development to entitlement cities resulted in an additional \$1,260,250 in CDBG funding to the City of Carrollton. This allocation, known as CDBG-CV funding, was to be used by entitlement cities to provide services for low- to moderate- income individuals and families who were directly affected by the COVID-19 virus. Under the established guidelines the City of Carrollton modified its 2019-2023 Consolidated Plan and PY2019 Action Plan to use the additional funding to assist social service agencies who provide shelter, food, medical, financial, and job training services to the residents of Carrollton. The amended PY22 Action Plan allowed CDBG funding to Metrocrest Services, a local social service agency, to create two programs addressing homeless issues. This funding along with General Funds from the city helped to address homeless prevention and homeless response.

Comparison of the proposed versus actual outcomes for each outcome measure submitted with the consolidated plan and explain, if applicable, why progress was not made toward meeting goals and objectives. 91.520(g)

Categories, priority levels, funding sources and amounts, outcomes/objectives, goal outcome indicators, units of measure, targets, actual outcomes/outputs, and percentage completed for each of the grantee's program year goals.

Goal	Category	Indicator	Unit of Measure	Expected Strategic Plan	Actual Strategic Plan	Percent Complete	Expected Program Year	Actual Program Year	Percent Complete
Assist Service Providers	Homeless Non-Homeless Special Needs Non-Housing Community Development	Public service activities other than Low/Moderate Income Housing Benefit (General Funds)	Persons Assisted	75,000	55,449	73.93%	15,000	20,763	138.42%
Assist Service Providers	Homeless Non-Homeless Special Needs Non-Housing Community Development	Homeless Intervention - Overnight Shelter (CDBG)	Persons Assisted	100	7	7.00%	50	7	14.00%
Assist Service Providers	Homeless Non-Homeless Special Needs Non-Housing Community Development	Homeless Prevention (CDBG)	Persons Assisted	200	209	104.50	200	209	104.50%
Improve Neighborhood Infrastructure	Non-Housing Community Development	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit (CDBG & General Funds)	Persons Assisted	25,000	14,888	59.55%	25,000	14,888	59.55%
Improve Neighborhood Infrastructure	Non-Housing Community Development	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit (CDBG & General Funds)	Households Assisted	500	340	68.00%	386	170	44.04%

Goal	Category	Indicator	Unit of	Expected	Actual	Percent	Expected	Actual	Percent
			Measure	Strategic	Strategic	Complet	Program	Program	Complet
				Plan	Plan	e	Year	Year	e
Preserve	Affordable	Homeowners	Households	100	61	61.00%	39	12	30.77%
Housing	Housing, Non-	Housing	Assisted						
Stock	Housing	Rehabilitated							
	Community	(CDBG)							
	Development								
Enhanced	Non-Housing	Housing Code	Household	3750	4878	130.08%	1200	3476	289.67%
Code	Community	Enforcement/F	Housing						
Enforcement	Development	oreclosed	Unit						
		Property Care							
		(CDBG)							

Table 1 – Accomplishments – Program Year & Strategic Plan to Date

Assess how the jurisdiction's use of funds, particularly CDBG, addresses the priorities and specific objectives identified in the plan, giving special attention to the highest priority activities identified.

During PY22 a total of \$461,415 in CDBG funding was used:

- \$200,000 Crosby Estates infrastructure project
- \$115,000 Metrocrest Services for new Homeless Prevention and Homeless Response Programs
- \$ 70,068 For Enhanced Code Enforcement
- \$ 56,505 For Minor Home Repair Program projects
- \$ 7,160 For Emergency Repair Program projects
- \$ 12,682 For Training of Community Development Staff

The City also allocated General funds to goals and objectives:

- \$1,291,072 to enhance local social service agencies' activities for Carrollton's vulnerable populations.
- \$170,800 in salary for three staff positions in the Community Development Program responsible for monitoring CDBG and Neighborhood Partnership activities.
- \$19,600 for two beautification grant projects through the Neighborhood Enhancement Matching Grant Program.
- \$117,592 for 52 projects in Neighborhood Empowerment Zone Program.

CR-10 - Racial and Ethnic composition of families assisted

Describe the families assisted (including the racial and ethnic status of families assisted). 91.520(a)

	CDBG
White	640
Black or African American	369
Asian	31
American Indian or American Native	2
Native Hawaiian or Other Pacific Islander	0
Total	1,042
Hispanic	474
Not Hispanic	568

Table 1 – Table of assistance to racial and ethnic populations by source of funds

Narrative

The table above accounts for the distribution by race of housing activities for CDBG funded projects. In PY22, a total of twelve homes were rehabilitated using CDBG funds. Hispanic recipients accounted for six of the projects, African-American/Black-1, White (non-Hispanic)-4, Asian-1. No other ethnic groups were documented to have received CDBG funding for PY22 for CDBG home repair funding.

The City of Carrollton amended the PY22 Action Plan in February 2023 due to an error of city staff interpretation of CDBG requirements for Public Service allowances and a failure of the prior HUD representative to identify this error during his review of the PY22 Action Plan. This revision also identified an additional three projects for CDBG funding to be allocated to in order to address funding timeliness issues. Initially funding in PY22 in the amount of \$650,000 was allocated to Metrocrest Services to start up two programs addressing homelessness in the city. The amended PY22 Action Plan required a deduction of \$535,000 in CDBG funding to meet the CDBG funding cap allowed for Public Services. The city made up the difference in lost funding in order to make Metrocrest Services whole for the remaining part of the PY22 year. At the time of the amended PY22 Action Plan Metrocrest Services had not exceeded the \$115,000 Public Services cap and the city did not have to repay any funding back to HUD. Infrastructure project in Crosby Estates was completed in PY22 and the infrastructure project for the Nolan/Ridgedale alleyway is currently underway and will be reported completed in the PY23 Plan Year. Infrastructure projects proposed for Carrollton Heights and Crockett Alley were cancelled due to delays in design. The later projects were addressed under the PY23 Action Plan for CDBG funding.

In PY22 the city allocated a total of \$1,291,072 in city General Funds to local social service agencies. The funding provided to those agencies assisted a total of 20,673 individuals. A breakdown by race and ethnicity for General Fund allocations were: 8,143 Hispanic (39.4%), 1,364 Black or African American (6.6%), 6,387 White - non-Hispanic (30.9%), 465 Asian (2.2%), 35 American Indian (.2%), 13 Pacific Islander (.06%), and 4,266 were listed as other or unknown (20.6%). The 2020 Census for Carrollton's

racial breakdown indicated White - non Hispanic comprised 38.8% of the population, Hispanic was 32.8%, Asian was 17.4%, Black/African American was 10.2%, American Indian was 0.3%, Hawaii/Pacific Islander was 0.06%, and 0.4% were listed as unknown.



CR-15 - Resources and Investments 91.520(a)

Identify the resources made available

Source of Funds	Source	Resources Made Available	Amount Expended During Program Year
CDBG	public - federal	1,205,000	461,415
Other	public - federal	5,240,237	5,240,237

Table 2 - Resources Made Available

Narrative

The 2019-2023 Consolidated Plan for the City of Carrollton identified the preservation of existing housing stock as a priority. There are currently three housing rehabilitation programs within the City of Carrollton's Housing Rehabilitation CDBG Program, the Minor Home Repair Program, the Emergency Repair Program, and People Helping People Program which assists low- to moderate- income residents with making repairs to their homes. CDBG funding is also used for the salary of a code enforcement officer to perform enhanced code enforcement inspections at multi-family apartments in the city's LMI Target Area. Infrastructure projects have also been identified in the LMI areas which uses CDBG funding in conjunction with city General Funds to perform repairs, replacement of streets, sidewalks, alleyways, water and sewer lines in the area. Public Service funding was initially given to Metrocrest Services to implement two programs relating to homelessness in the community. The initial funding allotted was found to be in excess of the cap imposed outlined in HUD rules and an amended Action Plan was filed to address the imbalance and ensure the allocation met the guideline standards. Because of the shortage of funds to Metrocrest Services the city made up the amount reduced by CDBG funding and replaced it with General Funds to make them whole for the year. The city used \$5,240,237 in General Funds to provide funding to multiple social service agencies, for projects in the Neighborhood Enhancement Zones, and for infrastructure work in the Crosby Estates neighborhood.

Identify the geographic distribution and location of investments

Target Area	Planned	Actual	Narrative Description
	Percentage of Allocation	Percentage of Allocation	
			Used for home repair, enhanced code
2019-2023 NOTICE			enforcement, infrastructure,
Priority Neighborhoods	74	87	homelessness

Table 3 – Identify the geographic distribution and location of investments

Narrative

In PY22 \$400,687 in CDBG funding was performed in the target area accounting for 87% of the CDBG funding spent for the year. Funding used for the salary of one code enforcement officer performing multi-family inspections of apartment communities in the LMI target area in the amount of \$70,068. An infrastructure project in the Crosby Estates neighborhood was completed using \$200,000 of CDBG funding along with city General Funds for replacement of streets, sidewalks, and curbs within the

neighborhood. Metrocrest Services is located in the LMI area and used \$115,000 in CDBG funding to initiate two programs addressing homelessness in Carrollton. Two Minor Home Repair projects and one Emergency Repair project totaling \$15,619 were conducted in the target area.

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.

Assist Service Providers: Since 1998 the city's Community Development Program has worked to develop partnerships throughout the community. In PY22 the City of Carrollton continued to support social services agencies by providing \$1,291,072 in General Funds to various social service providers which serve Carrollton. This funding in all cases amounts to less than 30% of the entire budget of any social service provider yet was used to leverage and add to many existing programs. The programs are discussed in more detail in Section CR-25 of this report. These providers help create necessary social safety nets for Carrollton's vulnerable populations and prevents overuse of other public services staff such as police, school districts, courts, and emergency personnel.

<u>Community Development Staffing:</u> Implementation and monitoring of CDBG funds for the city is performed by the Community Development staff. The salary for the three Community Development staff members amounts to \$170,890 which comes from the city's General Funds.

<u>Neighborhood Empowerment Zones:</u> Use of CDBG funding to assist low- to moderate- income residents resulted in the city creating additional programs using General Funds to address deteriorated housing and to revitalize neighborhoods in specific areas of the city. These projects include minor home repairs, single-family rehab, and demolition/rebuild grants. The city also used \$117,592 in General Funds to perform 52 projects in the Neighborhood Empowerment Zones.

CR-20 - Affordable Housing 91.520(b)

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

	One-Year Goal	Actual
Number of Homeless households to be		
provided affordable housing units	0	0
Number of Non-Homeless households to be		
provided affordable housing units	39	12
Number of Special-Needs households to be		
provided affordable housing units	0	0
Total	39	12

Table 5 - Number of Households

	One-Year Goal	Actual
Number of households supported through		
Rental Assistance	0	0
Number of households supported through		
The Production of New Units	0	0
Number of households supported through		
Rehab of Existing Units	39	12
Number of households supported through		
Acquisition of Existing Units	0	0
Total	39	12

Table 6 – Number of Households Supported

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

Carrollton has no direct city created programs to provide homeless or non-homeless affordable housing units. In PY22 the city directed CDBG funding to Metrocrest Services to start two programs specifically aimed to assist homelessness in Carrollton.

The City of Carrollton has a one-year goal to rehab 39 existing housing units with CDBG funding. In PY22 a total of 12 CDBG funded rehabilitation housing projects were completed. An additional 52 Neighborhood Empowerment Zone projects were completed during PY22 with general funds.

Two issues which continue to cause an impact on meeting the city's One-Year Goal. The first has been the ongoing COVID-19 illness which creates situations where older individuals who are more susceptible to COVID-19 are fearful of having contractors or groups around to make repairs on their homes due to fear of acquiring the infection. Second, has been individuals who fail to provide the necessary paperwork to staff to confirm their eligibility for use of CDBG funding and their income levels or who have intentionally misled staff or provided false information in attempts to gain access to the CDBG funded programs.

Discuss how these outcomes will impact future annual action plans.

In PY20 city staff had a belief with the emergence of COVID-19 many low- to moderate- income residents who live paycheck to paycheck would suffer a loss in wages which could prevent them from making necessary repairs on their homes. Staff increased the expected level from previous program levels of approximately 21 housing repair projects to 39 housing repair projects. Since PY20 to now the anticipated increase in CDBG funded housing repair projects has not occurred. Starting in PY24 the city will move to reduce expected housing projects back to the previous established levels. Since PY20 the city has not processed any projects or requests for the People Helping People program, therefore in PY24 this program will be folded into the Minor Home Repair Program moving forward. City staff will endeavor to research new methods of outreach to increase awareness of the CDBG programs the city has available for those who qualify. Staff will also continue to ensure applicants provide all appropriate documentation to qualify for a CDBG funded projects.

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

Number of Households Served	CDBG Actual	HOME Actual
Extremely Low-income	6	0
Low-income	2	0
Moderate-income	4	0
Total	12	0

Table 7 - Number of Households Served

Narrative Information

The Minor Home Repair Grants, Emergency Repair Grants, and People Helping People program funded through CDBG provided low- to moderate- income homeowners with assistance for interior and exterior repairs on their homes. In PY22 CDBG funding in the amount of \$72,009 was drawn upon to address 12 qualifying projects.

One hundred percent of all CDBG funding for the housing rehabilitation programs for the aforementioned grants were dedicated to persons of low- to moderate- income and was for needed repairs affecting the health, safety, and long-term sustainability of the homes and surrounding neighborhoods. Twelve home rehabilitation projects were completed in PY22. Of these homes 6 (50.0 %) were occupied by extremely low- income homeowners, 2 (16.7%) were for low - income families, and

4 (33.3%) were for moderate- income families. Elderly homeowners accounted for 5 (41.6%) of the projects in PY22 and female head of household accounted for 8 (66.7%) of the projects completed.



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

Strategies addressing the homeless and non-homeless with special needs populations is included in the 2019-2023 Consolidated Plan, the City continues to allocate a portion of its general fund towards grants and donations to Carrollton social service providers which target low- to moderate- income residents. The City also provides information, referral, and technical assistance along with financial support to local social service agencies serving the homeless and non-homeless citizens with special needs. In PY22 as part of Public Services aspect in the CDBG program the city provided direct CDBG financial assistance to Metrocrest Services to implement two homeless programs, one for preventing homelessness, the second for homeless response. The city also provided \$1,291,072 in additional funding to multiple social service agencies for assistance in anti-poverty initiatives, homelessness prevention, and special needs populations.

Addressing the emergency shelter and transitional housing needs of homeless persons

The City of Carrollton does not receive Emergency Shelter Grant (ESG) funding.

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 noted earlier, in addition, the City Council made available \$1,291,072 in General Fund resources to agencies which are actively engaged in the provision of social services in Carrollton.

In exchange for the funding, the agencies and organizations work closely with the city in providing social services to all citizens in need. The close partnership the city has with each agency has grown with each year of collaboration. The staff who are employed as part of the CDBG grant administration and planning activity provide technical, referral, and capacity building assistance for the agencies on an ongoing basis.

In PY22 the city helped accomplish the following goals through its local non-profit partners in an attempt to reduce the overall number of persons living in poverty in Carrollton:

- Funded food pantries in both Dallas and Denton counties which the City of Carrollton resides.
- Improved access to preventative care, basic health care, and medical services for low-to

- moderate- income families thus reducing costs for medical services and expensive trips to the emergency room.
- Improved the linkage between job training programs and local job creation efforts to attract
 jobs that pay above minimum wages and provide people with the ability to service a home
 mortgage.
- Promoted financial counseling and classes on budgeting and money management. In PY22 the
 City continued to promote area training and educational opportunities in this area.
- Promoted linkages between housing, employment, and educational systems and/or facilities.
- Promoted programs and training that help families-in-need to become more self-sufficient.
- Funded after-school programs for low-income students providing tutoring and college
 preparation for junior high school and high school students coming from families where the
 majority of parents never finished high school.
- Funded domestic violence and leadership training for adults and children.

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

The City's position on this issue will continue to be one of supporting and assisting social service agencies working to address this challenge in a coordinated and proactive manner. As stated earlier in this report in PY22 the city directed CDBG funding to Metrocrest Services for implementation of two programs addressing homelessness in the community.

The aforementioned services are provided to the homeless population, populations at risk of becoming homeless, and those transitioning from homelessness. The City of Carrollton also supplements the work of various City funded social service agencies to end chronic homelessness by promoting the preservation and maintenance of existing housing through its Minor Home Repair Grants, Emergency Repair Grants, and People Helping People Program.

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

Actions taken to address the needs of public housing

This section is not applicable, as the City of Carrollton does not have a public housing authority. Also, the city does not receive or administer funds for assisted housing. Data on the number of individuals with Section 8 housing in Carrollton was not available.

Dallas County Housing Authority

The waiting list for Section 8 housing in Dallas County currently exceeds 6,000 families.

Denton County Housing Authority

_Denton County maintains Section 8 housing vouchers for the county. The Section 8 waiting list is closed with an approximate five-year waiting period for those currently pending on the Section 8 list.

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

The City of Carrollton does not offer a first-time home buyer's program or provide incentives for purchasing homes currently. The city created a first-time home buyer's program with funding from the State of Texas. In a two-year period the city was unable to qualify any individual for a first time home buyer grant. The funding was returned to the state.

Actions taken to provide assistance to troubled PHAs

The City of Carrollton does not operate a public housing authority. The majority of the city straddles two counties - Dallas County and Denton County. Both of those counties operate PHA's and are regulated by the county government and not the cities.

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)

The City of Carrollton continues to maintain a strong emphasis on safe and affordable housing for all residents. The City of Carrollton Environmental Services Department has two inspection programs geared towards maintaining rental properties; one for single-family rental property and the other for multi-family rental property.

The Single-Family Rental Registration and Inspection Ordinance adopted by the City Council ensures tenants and landlords of single-family residential rental properties are involved in maintaining their properties in a safe and sanitary condition. The Single-Family Rental Inspection Program is effective in ensuring a sustainable community and safe housing is available in all of the neighborhoods in Carrollton. The ultimate goals are to improve the overall condition of rental properties, to reduce health and safety risks, and to prevent blight which affects surrounding homes, thus enhancing property values within the affected neighborhoods. This ordinance requires all rental property owners and companies who lease single-family homes or duplexes in Carrollton to register those properties with the City and make them available for inspection should complaints or city staff observe city code violations on the property.

The Multi-Family Inspection Program works to stabilize, maintain, and enhance all of the apartment communities in Carrollton. The program operates in partnership with the residents and management staff of those apartment communities to achieve this goal through the enforcement of the City's Code of Ordinances and the Comprehensive Zoning Ordinance. The Multi-Family Inspection Program operates by performing annual inspections of apartment communities. These detailed inspections of apartment communities include interior and exterior inspections of apartment units within the community and the CDBG Target Area. The number of apartment unit interiors is normally 15% of the total number of units within the apartment community. However, if the property has a constant history of non-compliance or serious health and safety issues the city may inspect up to 100% of all of the apartment units to ensure residents are living in a safe and healthy environment. The city also addresses any apartment complaints submitted to the city and city staff perform inspections to determine if potential violations are present.

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

The City of Carrollton has further initiatives to address issues of aging housing which is funded through General Funds and not CDBG funds. The city council approved the creation of five Neighborhood Empowerment Zones (NEZ) in neighborhoods at the greatest risk of distress due to housing conditions, age, and the condition of infrastructure. One of the current incentives for residents and owners within the designated Neighborhood Empowerment Zones is the waiving of construction fees, including building permit fees, impact fees, platting fees, and project permit fees (fences, electrical, plumbing,

etc.), for both commercial and residential properties to encourage repair, rehabilitation, and redevelopment in those areas of the city.

Three programs operating tied to the Neighborhood Empowerment Zones are as follows:

- <u>NEZ Minor Home Repair:</u> Income qualifying homeowners living in one of the five Neighborhood Empowerment Zones can receive up to \$7,500 for exterior improvements, including items not on the house itself, such as fences, retaining walls, sewer lines.
- <u>Single-Family Rehabilitation Incentive:</u> Any homeowner living in a Neighborhood Empowerment Zone in a home that is at least five years old qualifies for a reimbursement of 25% of exterior rehabilitation expenses if the homeowner invests a minimum of \$1,000 in rehabilitation work.
- <u>Demolition/Rebuild Incentive:</u> Any property owner within the NEZ area who has a house in disrepair and is substandard may apply to the city for this incentive. This incentive includes reimbursement for full demolition costs of the house on the property and provides a tax credit towards the value of new home construction. The tax credit is applied for a period of ten years in the form of a one-time payment from the city.

These programs offer another level of support to property owners in older neighborhoods of the city. In PY22 awarded \$117,592 in funding for 52 projects.

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

During PY22, The City of Carrollton has continued to demonstrate its commitment to the eradication of lead-based paint hazards in the community.

For residents receiving assistance under the city's Minor Home Repair, Emergency Repair, and People Helping People Programs the city follows federal regulations where a lead-based paint hazard is involved. To determine if a lead-based paint hazard is present, houses built before 1978 are tested for the presence of lead by a certified technician. In the event lead-based paint is present, the city hires technicians certified in safe work practices for the removal of lead-based paint.

All CDBG funded projects meet all applicable regulations related to lead-based paint. Residences built before 1978 utilizing the Minor Home Repair Program are tested for lead-based paint to comply with HUD requirements. In the event lead-based paint is detected, HUD guidelines are followed, including the distribution of lead-based paint information.

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

During PY22 the City of Carrollton provided general funding of \$1,291,072 to social service agencies to address local objectives and strategies identified in the 2019-2023 Consolidated Plan. All the agencies identified in Appendix 1 predominantly serve persons of low- to moderate- income.

The city council considers the awarding of social service contracts annually. The city is proud of its continue partnership with the identified agencies/organizations. A brief outline of the specific services

and activities offered by each of the agencies is also included in Appendix 1.

Cumulatively, these agencies served 20,673 individuals in Carrollton. The agencies identified and served 8,143 (39.4%) Hispanics, 1,364 (6.6%) African-Americans, and 465 (2.2%) Asians. These specific demographic groups accounted for 48.2% of the individuals served by the city funded social service agencies.

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

Neighborhood Reinvestment

In previous years the city has used CDBG funding to perform infrastructure projects in low- to moderate-neighborhoods in Carrollton. However, due to the changes and revisions in Section 3 the city infrastructure projects have been impacted by the new requirements. This has resulted in the reduction of funding on such projects to a \$200,000 cap in order to perform work in areas of infrastructure without Section 3 penalties being applied. In PY22 an infrastructure project used some CDBG funding as part of the project for the Crosby Estates neighborhood. Work on this project had a total funding of \$3,831,573 of which \$200,000 in CDBG funding was applied. Also, an infrastructure project to replace an alleyway between Nolan and Ridgedale Drive was identified but is still currently under construction and will be recorded in the PY23 CAPER. The city will continue to evaluate all neighborhoods in Carrollton to establish and determine areas of immediate infrastructure needs. The city does perform enhanced code enforcement with a CDBG funded code enforcement officer who conducts apartment inspections for multi-family communities located within the CDBG target area.

Neighborhood Matching Grants

The city has an established Neighborhood Enhancement Matching Grant Program which may provide up to \$25,000 in general funds to perform upgrades and enhancements to public property within a neighborhood. These grants can be used for beautification, signage, and landscaping projects.

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

This section is not applicable as Carrollton does not have a public housing authority.

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

In PY20 the City of Carrollton completed the Analysis of Impediments to Fair Housing and continues to review relevant aspects applicable to Carrollton. The city will be moving to update its Analysis of Impediments in PY23.

CR-40 - Monitoring 91.220 and 91.230

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

The City of Carrollton's Community Development Program continuously monitors programs and projects to ensure compliance with all applicable laws and regulations. Staff focuses on the following areas: environmental, financial, labor relations, and programmatic areas.

The environmental standards and procedures developed and implemented include the completion of compliance checklists for all activities and the city's annual Environmental Review Record (ERR). Staff maintains a copy of the ERR available for year-round public review during regular business hours in the Environmental Services Department at City Hall located at 1945 E. Jackson Road, Carrollton Texas.

Community Development program staff and the city's accounting staff administer financial monitoring for all projects, programs, and activities. The city's Treasury Division works closely with the Community Development staff to ensure all drawdowns are made after all ledgers and records have been reconciled and approved. The city's Purchasing Department assists with procurement and the general bidding process to ensure compliance with all applicable state and federal regulations. The financial operations and expenditures of the city are audited on an annual basis by an independent accounting firm.

The Community Development staff administers, monitors, and reviews labor standards on all capital improvement projects. Contractors are provided with training prior to the start of each project. All applicable Davis-Bacon and Related Acts (DBRA) are explained to the contractor. All contractor payments are contingent upon payment of proper wages to employees and the city's receipt of appropriate payroll records. Contractors are reviewed to ensure they have a SAMS and DUN number and have not been disbarred from receiving federal funds.

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

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

The first public hearing for the PY22 CAPER was held on Thursday, November 9, 2023, before the Neighborhood Advisory Committee. The second public hearing for the PY22 CAPER was held on Tuesday, December 5, 2023, before the Carrollton City Council. Notice was posted for the public hearing in the Dallas Morning News. These hearings summarized the report, noting it has been available for review either in person at City Hall or through the city's website. Citizen comments were welcomed at the hearings or in writing and instructions were provided on how to comment.

Neighborhood Advisory Committee Public Hearing - Thursday, November 9, 2023

The Neighborhood Advisory Committee held a public hearing on Thursday, November 9, 2023, to receive comments on the PY22 CAPER. At the meeting there were no public comments received during the public hearing regarding the PY22 CAPER. After receiving no public comments, the Neighborhood Advisory Commissioners were allowed to ask questions.

The commissioners had no inquiries directed towards the PY22 CAPER.

As there were no further comments from the commissioners, the chair moved to close the public hearing and a motion was made to approve the PY22 CAPER and forward it on for a public hearing before the City Council on December 5, 2023. The commissioners voted and approved the resolution and to forward the report onto the Carrollton City Council.

City Council Public Hearing - Tuesday, December 5, 2023

The City Council held a public hearing on Tuesday, December 5, 2023, to receive comments on the PY22
CAPER. At the meeting there were public comments regarding the PY22 CAPER. After asking for
and receiving public comments, the City Council voted to a resolution the
PY22 CAPER and forwarding the report to the Department of Housing and Urban Development.
public comments were received by staff through email, written correspondence, or reported in
on site visits.
Public Notices were featured on the city's website and were published in the Dallas Morning News on
Sunday, October 29, 2023, and Sunday, November 5, 2023

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.

In PY22 Action Plan called out funding for homelessness programs by Metrocrest Services. An allocation of \$650,000 to Metrocrest Services in CDBG funding was given. This was reviewed by our former HUD representative and the plan was accepted. In late January 2023 in an inquiry from staff to our former HUD representative information came back indicating a possible problem with the funding. Further inquiries to our former representative resulted in city staff escalating the issue to the head of the Ft. Worth HUD office. Upon review it was indicated the Public Service funding exceeded the allowed cap. The PY22 Action Plan was amended in February of 2023 reducing the funding down to the level the Public Service cap allowed. This resulted in a \$535,000 shortfall for Metrocrest Services. The city was able to locate adequate funding to bridge the gap and to make Metrocrest Services whole for the year. Because of Section 3 revisions the city has had to rethink infrastructure projects and has moved to \$200,000 allotments in order to avoid penalties from Section 3 requirements. The city does not have the staff size to perform the additional duties outlined to alleviate Section 3 requirements.

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

No

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

CR-58 - Section 3

Identify the number of individuals assisted and the types of assistance provided

Total Labor Hours	CDBG	HOME	ESG	HOPWA	HTF
Total Number of Activities	0	0	0	0	0
Total Labor Hours	0				
Total Section 3 Worker Hours	0				
Total Targeted Section 3 Worker Hours	0				

Table 8 – Total Labor Hours

Qualitative Efforts - Number of Activities by Program	CDBG	HOME	ESG	HOPWA	HTF
Outreach efforts to generate job applicants who are Public Housing	0				
Targeted Workers	U				
Outreach efforts to generate job applicants who are Other Funding	0				
Targeted Workers.					
Direct, on-the job training (including apprenticeships).	0				
Indirect training such as arranging for, contracting for, or paying tuition for, off-site training.	0				
Technical assistance to help Section 3 workers compete for jobs (e.g., resume assistance, coaching).	0				
Outreach efforts to identify and secure bids from Section 3 business					
concerns.	0				
Technical assistance to help Section 3 business concerns understand	0				
and bid on contracts.	U				
Division of contracts into smaller jobs to facilitate participation by Section 3 business concerns.	0				
Provided or connected residents with assistance in seeking employment including: drafting resumes, preparing for interviews, finding job	0				
opportunities, connecting residents to job placement services.					
Held one or more job fairs.	0				
Provided or connected residents with supportive services that can provide direct services or referrals.	0				
Provided or connected residents with supportive services that provide one or more of the following: work readiness health screenings, interview clothing, uniforms, test fees, transportation.	0				
Assisted residents with finding child care.	0				
Assisted residents to apply for, or attend community college or a four year educational institution.	0				
Assisted residents to apply for, or attend vocational/technical training.	0				
Assisted residents to obtain financial literacy training and/or coaching.	0				
Bonding assistance, guaranties, or other efforts to support viable bids from Section 3 business concerns.	0				
Provided or connected residents with training on computer use or online technologies.	0				
Promoting the use of a business registry designed to create opportunities for disadvantaged and small businesses.	0				
Outreach, engagement, or referrals with the state one-stop system, as designed in Section 121(e)(2) of the Workforce Innovation and Opportunity Act.	0				
Other.	0				

Table 9 – Qualitative Efforts - Number of Activities by Program

Narrative

None of the completed activities by the city in PY22 qualified for Section 3 requirements.

