

## Executive Summary

### AP-05 Executive Summary - 24 CFR 91.200(c), 91.220(b)

#### 1. Introduction

The City of Round Rock is a federal entitlement community under the U.S. Department of Housing and Urban Development's Community Development Block Grant (CDBG) Program. As a HUD entitlement community, the City is required to prepare an Annual Action Plan in order to implement the CDBG program that funds housing, community development and economic development within the community. The City of Round Rock Annual Action Plan covers the period from October 1, 2015 to September 30, 2016. The City of Round Rock will receive \$570,575 in CDBG funds for the 2015-2016 program year. This is the second program year to implement the high priority needs that are identified in the City of Round Rock Five Year Consolidated Plan (2014-2018). In this second program year, Community Development Block Grant funds are allocated to Public Facilities and Improvements, Public Services, Single Family Rehabilitation and Shelter Rehabilitation. (See Projects in Section AP 35)

During the development of this plan, the City held two public hearings to solicit input from residents and social service providers in Round Rock. No comments were received.

The City may obligate up to 20% of the current years allocation (\$114,115) for eligible and reasonable planning administrative costs. [25 CFR 570.200 (g)]

The City may obligate up to 15% of the current years allocation (\$85,586) for public services. [24 CFR 570.201 (e)].

In addition to funding caps, other federal requirements will be considered to determine if a project is eligible for CDBG funding. Any project or activity must meet one of the three (3) National Objectives to be eligible [24 CFR 570.200 (a)]: 1) Benefit low and moderate income persons; or 2) Prevent slum or blight; or 3) Meet an urgent need (per HUD's definition).

#### 2. Summarize the objectives and outcomes identified in the Plan

This could be a restatement of items or a table listed elsewhere in the plan or a reference to another location. It may also contain any essential items from the housing and homeless needs assessment, the housing market analysis or the strategic plan.

The City of Round Rock is using the three (3) main components of the HUD Outcome Performance Measurement System: Objectives, Outcomes and Indicators.

The HUD Outcome Performance Measurement System offers three (3) possible objectives for each activity: Decent housing, a suitable living environment and expanded economic opportunities.

The second component is closely related to the objectives. The program outcome helps further refine the grantee's objective and is designed to capture the nature of the change or the expected result of the objective that a grantee seeks to achieve. The three outcomes are: Availability, Affordability and Sustainability.

There are some common indicators that will be reported for nearly all program activities. The four common indicators are:

1. Amount of money leveraged from other Federal, state and local and private sources, per activity.
2. Number of persons, households, businesses, units or beds assisted as appropriate.
3. Income levels of persons or households by 30 percent, 50 percent, 60 percent or 80 percent of area median income.
4. Race, ethnicity, and disability date for activities that currently report these data elements.

The City has developed these performance measures in accordance with the Final Rule for 24 CFR Parts 91.220 and 91 as well as utilizing IDIS to track the outputs and outcomes of each project and activity.

### **3. Evaluation of past performance**

This is an evaluation of past performance that helped lead the grantee to choose its goals or projects.

The City of Round Rock has a history of successful programs funded through the Community Development Block Grant Program. Of particular importance to the health of the City have been programs that address the condition of the housing stock. The City has successfully funded CDBG projects which have improved the overall quality of life and the community serving low- and moderate-income persons. The City has successfully funded housing rehabilitation activities targeting lower income and elderly households unable to properly maintain their homes. The City also funds social service agencies that provide services aimed at helping low to moderate income persons with housing/mortgage assistance and access to a food pantry.

### **4. Summary of Citizen Participation Process and consultation process**

Summary from citizen participation section of plan.

The City of Round Rock's goal for citizen participation is to ensure a broad participation of City residents, housing, economic and service providers in the planning and implementation of community development and housing programs. Citizen Participation takes the form of advertised public hearings.

For the development of the 2015-2016 Annual Action Plan, a public notice was published in the Round Rock Leader on Saturday, March 7, 2015. Notice of this "Needs Assessment" public hearing was also posted on the bulletin outside city hall on Friday, March 6, 2015 and posted in the "City News" section of the City of Round Rock's website ([www.roundrocktexas.gov](http://www.roundrocktexas.gov)).

Residents were notified of the draft plan comment period (May 26, 2015 to July 8, 2015) in the Round Rock Leader on May 23, 2015 and was posted on the bulletin outside city hall and on the city website as well.

**5. Summary of public comments**

This could be a brief narrative summary or reference an attached document from the Citizen Participation section of the Con Plan.

No comments were received.

**6. Summary of comments or views not accepted and the reasons for not accepting them**

No comments were received. See above.

**7. Summary**

The 2015 Draft Annual Action Plan was placed in the Central Library, the offices of the Housing and Community Development, the Alan R. Baca Senior Center, the Round Rock Housing Authority and online for public review and comment period was from May 26, 2015 to July 8, 2015 at 5pm.

**PR-05 Lead & Responsible Agencies – 91.200(b)**

**1. Agency/entity responsible for preparing/administering the Consolidated Plan**

Describe the agency/entity responsible for preparing the Consolidated Plan and those responsible for administration of each grant program and funding source.

Agency Role	Name	Department/Agency
CDBG Administrator	ROUND ROCK	Office of Community Development/Finance Department

**Table 1 – Responsible Agencies**

**Narrative (optional)**

The City of Round Rock Office of Community Development is the lead agency for the preparation of the Annual Action Plan and the administration of the CDBG program. Annual funding requests open in February with applications due in March. Funding decisions are made in May.

**Consolidated Plan Public Contact Information**

Office of Community Development  
221 East Main Street  
Round Rock, TX 78664  
Contact: Liz Alvarado, CDBG Coordinator  
Telephone: 512-341-3328

Email: [lalvarado@roundrocktexas.gov](mailto:lalvarado@roundrocktexas.gov)

## **AP-10 Consultation – 91.100, 91.200(b), 91.215(I)**

### **1. Introduction**

The City of Round Rock works with a wide variety of agencies, organizations and service providers in an effort to identify local housing and service needs. On-going relationships focused on specific needs designed to bring public input into the Annual Action Plan are another way the City utilizes outside organizations in the consultation and development process.

#### **Provide a concise summary of the jurisdiction's activities to enhance coordination between public and assisted housing providers and private and governmental health, mental health and service agencies (91.215(I))**

The City of Round Rock actively attends the Williamson County Monthly Networking Meetings held the first Tuesday of every month. At these networking meetings, non-profits, social service providers, public housing agencies, and health and human service providers discuss the needs of their clients as well as resources and services that their agency provides for the community. The City also works closely with the Housing Authority of Round Rock who organizes resources from the federal government to address the housing needs of City's lowest income households.

#### **Describe coordination with the Continuum of Care and efforts to address the needs of homeless persons (particularly chronically homeless individuals and families, families with children, veterans, and unaccompanied youth) and persons at risk of homelessness.**

The City of Round Rock Office of Community Development works closely with local homeless providers, including Hope Alliance and the Round Rock Area Serving Center, to address the needs of the homeless persons.

The City of Round Rock has in the past funded the Round Rock Area Serving Center. Funding was used for the purchase of food for the food pantry. The Round Rock Area Serving Center assisted over 1,000 households with food during program year 2014. In an effort to prevent homelessness the Round Rock Area Serving Center also provides mortgage assistance to the residents of Round Rock.

#### **Describe consultation with the Continuum(s) of Care that serves the jurisdiction's area in determining how to allocate ESG funds, develop performance standards for and evaluate outcomes of projects and activities assisted by ESG funds, and develop funding, policies and procedures for the operation and administration of HMIS**

The City of Round Rock does not receive ESG funds. The City works closely with the Williamson Burnet Counties Opportunities (WBCO) organization, the recipient of ESG funds for the area that includes the City of Round Rock. The City will continue to work with WBCO to address homelessness. The City of

Round Rock is also a member of the Texas Homeless Network, the lead agency for Continuum of Care in Williamson County.

**2. Describe Agencies, groups, organizations and others who participated in the process and describe the jurisdiction's consultations with housing, social service agencies and other entities**

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**Table 2 – Agencies, groups, organizations who participated**

1	<b>Agency/Group/Organization</b>	ROUND ROCK AREA SERVING CENTER
	<b>Agency/Group/Organization Type</b>	Services - Housing Services-homeless Services-Education
	<b>What section of the Plan was addressed by Consultation?</b>	Homeless Needs - Families with children
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	The City of Round Rock has an on-going relationship with the Round Rock Area Serving Center. During the year, the Office of Community Development often receives calls from residents asking for information on resources for homeless or homeless prevention. The City works throughout the year with the Serving Center to meet the needs of these residents.
2	<b>Agency/Group/Organization</b>	ROUND ROCK HOUSING AUTHORITY
	<b>Agency/Group/Organization Type</b>	PHA Services-Education Services-Employment
	<b>What section of the Plan was addressed by Consultation?</b>	Public Housing Needs
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	The Round Rock Housing Authority has three (3) locations in Round Rock that and provide housing to 100 families. The Round Rock Housing Authority issues approximately 100 housing vouchers a year. In addition to receiving CDBG Funds for their Neighborhood Outreach Center they also receive a yearly Capital Fund Grant from the U.S. Department of Housing and Urban Development that allows them to maintain and rehab existing units. This funding also allows for the training of staff.

3	<b>Agency/Group/Organization</b>	HOPE ALLIANCE
	<b>Agency/Group/Organization Type</b>	Services-Victims of Domestic Violence
	<b>What section of the Plan was addressed by Consultation?</b>	Homeless Needs - Families with children
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	City of Round Rock works closely with Hope Alliance throughout the year. In addition to awarding CDBG funds for shelter rehabilitation, the City also awards Hope Alliance with social service funds to pay the salary for a counselor.
4	<b>Agency/Group/Organization</b>	BLUEBONNET TRAILS COMMUNITY MENTAL HEALTH AND MENTAL RETARDATION
	<b>Agency/Group/Organization Type</b>	Services-Health Health Agency
	<b>What section of the Plan was addressed by Consultation?</b>	Transitional Housing
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	CDBG Staff networks with providers of different programs at Blue Bonnet Trails MHMR.
5	<b>Agency/Group/Organization</b>	Habitat for Humanity of Williamson County
	<b>Agency/Group/Organization Type</b>	Housing Services - Housing
	<b>What section of the Plan was addressed by Consultation?</b>	Actions to foster/maintain affordable housing

	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	City of Round Rock is currently funding Habitat for Humanity for their Affordable Home Repair Program. CDBG staff refers clients needing home repair and housing to Habitat for Humanity. CDBG staff consulted with Habitat Home Repair Project manager during the development of the action plan.
6	<b>Agency/Group/Organization</b>	ABUSED & NEGLECTED CHILDREN-CASA
	<b>Agency/Group/Organization Type</b>	Services-Children Services-homeless Services - Victims
	<b>What section of the Plan was addressed by Consultation?</b>	Homeless Needs - Families with children
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	CDBG staff works with CASA during the program year because CASA is a CDBG funded agency. During the development of the action plan staff met with CASA executive director in person.
7	<b>Agency/Group/Organization</b>	City of Round Rock
	<b>Agency/Group/Organization Type</b>	Housing Other government - Local Planning organization Grantee Department Neighborhood Organization
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	CDBG staff consults during the program year and during the development of the action plan with City of Round Rock Code Enforcement, Planning, Development Services, Inspection, and Neighborhood Services departments thru phone calls, emails and meetings.

8	<b>Agency/Group/Organization</b>	AUSTIN TENANTS COUNCIL
	<b>Agency/Group/Organization Type</b>	Service-Fair Housing
	<b>What section of the Plan was addressed by Consultation?</b>	Non-Homeless Special Needs
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	CDBG staff consults with the Austin Tenants Council during the program year. Residents needing assistance with tenant landlord issues or wanting to file a fair housing complaint are referred to the Austin Tenants Council.
9	<b>Agency/Group/Organization</b>	WILLIAMSON COUNTY HEALTH DISTRICT
	<b>Agency/Group/Organization Type</b>	Services-Children Services-Elderly Persons Services-Persons with HIV/AIDS Services-Health Health Agency Other government - County
	<b>What section of the Plan was addressed by Consultation?</b>	health care needs
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	CDBG staff networks during the program year with the Williamson County Health District. Coordination, client needs and resource information is exchanged at the Williamson County monthly networking meeting.
10	<b>Agency/Group/Organization</b>	WILLIAMSON BURNET COUNTIES OPPORTUNITIES (WBCO)
	<b>Agency/Group/Organization Type</b>	Services-Children Services-Elderly Persons

	<b>What section of the Plan was addressed by Consultation?</b>	Homeless Needs - Families with children
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	CDBG staff consults with WBCO during the program year. WBCO is currently being funded with CDBG funds for Meals on Wheels Senior Nutrition Program.
11	<b>Agency/Group/Organization</b>	Williamson County Commissioners Court
	<b>Agency/Group/Organization Type</b>	Other government - County
	<b>What section of the Plan was addressed by Consultation?</b>	networking
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	CDBG staff networked and consulted with the Williamson County CDBG Coordinator during the program year and during the development of the action plan.

**Identify any Agency Types not consulted and provide rationale for not consulting**

A wide variety of agencies were invited to consult in the development of the Annual Action Plan. No individual agencies were intentionally omitted.

**Other local/regional/state/federal planning efforts considered when preparing the Plan**

Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
Continuum of Care	Texas Homeless Network	Coordinating homelessness services with Continuum of Care priorities.

**Table 3 – Other local / regional / federal planning efforts**

**Narrative (optional)**

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**AP-12 Participation – 91.105, 91.200(c)**

**1. Summary of citizen participation process/Efforts made to broaden citizen participation  
Summarize citizen participation process and how it impacted goal-setting**

Citizen participation was obtained through public hearings at City Council meetings and public notices in the local newspaper. The City of Round Rock Citizen Participation Plan details procedures to follow for public hearings, plan amendments, reporting information and public accountability.

The Action Plan was available on the City website, at the public library, at the Alan R. Baca Senior Center, at City hall, Round Rock Housing Authority and all public notices listed these places along with the address to each location.

**Citizen Participation Outreach**

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
1	Public Hearing	Persons with disabilities Residents of Public and Assisted Housing Seniors	No response.	No comments received.		

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
2	Newspaper Ad	Persons with disabilities Residents of Public and Assisted Housing Seniors	No response.	No comments received.		
3	Internet Outreach	Persons with disabilities Residents of Public and Assisted Housing Seniors	No response.	No comments received.		<a href="http://www.roundrocktexas.gov">www.roundrocktexas.gov</a>
4	posting of public notice on city bulletin outside city hall	Persons with disabilities Residents of Public and Assisted Housing Seniors	No response.	No comments received.		

**Table 4 – Citizen Participation Outreach**

## Expected Resources

### AP-15 Expected Resources – 91.220(c) (1, 2)

#### Introduction

It is anticipated that the City of Round Rock will receive CDBG funds totaling \$570,575 for FY 2015-2016.

#### Priority Table

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Reminder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
CDBG	public - federal	Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services	570,575	9,852	0	580,427	1,711,725	CDBG funds will be used to address housing and non-housing community development needs. Program income is generated by Habitat for Humanity Land Acquisition.

Table 5 - Expected Resources – Priority Table

#### Explain how federal funds will leverage those additional resources (private, state and local funds), including a description of how matching requirements will be satisfied

In an effort to leverage funds, the City has combined the CDBG and General Funds to assist the social service funding process. By combining these two processes, the City can make sure to fund agencies providing high priority need with General Funds that could not be funded with

CDBG funds due to the 15% funding cap. This also eliminates the duplication of services. The process of funding social services is as follows: A team, consisting of Council members, Assistant City Manager, City finance staff and CDBG staff, review agency applications using set criteria and performance measurement. Funding recommendations are presented to the City Council through the budget process. Awarded agencies are contracted to deliver the specific services to residents of Round Rock.

**If appropriate, describe publically owned land or property located within the jurisdiction that may be used to address the needs identified in the plan**

Improvements to the Greenhill Subdivision with new sidewalks, on publicly owned land, will address the need in the community for improved public facilities.

**Discussion**

The City of Round Rock developed Program Income Policies and Procedures. These policies and procedures are included with every CDBG agreement as an attachment. The policy details the following:

- Definition and examples of program income
- Disposition of Income and Reports
- Income more than \$25,000 or income less than \$25,000

Should an agency or activity generate program income, the City will use this policy to determine how these funds will be spent.

## Annual Goals and Objectives

### AP-20 Annual Goals and Objectives - 91.420, 91.220(c)(3)&(e)

#### Goals Summary Information

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	Affordable Housing: Minor Repairs and Modification	2014	2018	Affordable Housing	Citywide	Affordable Housing	CDBG: \$5,874	Homeowner Housing Rehabilitated: 1 Household Housing Unit
2	Public Facility and Infrastructure Improvements	2014	2018	Non-Housing Community Development	LMI & LMA	Non-housing Community Development	CDBG: \$275,000	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 100 Persons Assisted Public Facility or Infrastructure Activities for Low/Moderate Income Housing Benefit: 238 Households Assisted
3	Public Facility Imp.: Domestic Violence Shelter	2014	2018	Non-Housing Community Development	N/A	Non-housing Community Development	CDBG: \$90,000	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 300 Persons Assisted
4	Public Services: Housing Assistance	2014	2018	Affordable Housing	Citywide	Affordable Housing	CDBG: \$25,000	Public service activities for Low/Moderate Income Housing Benefit: 250 Households Assisted

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
5	Public Services: Food Banks	2014	2018	Public Services	Citywide	Affordable Housing	CDBG: \$25,000	Public service activities for Low/Moderate Income Housing Benefit: 950 Households Assisted
6	Public Services: After School Tutoring	2014	2018	Public Services	Citywide	Affordable Housing Non-housing Community Development	CDBG: \$13,086	Public service activities other than Low/Moderate Income Housing Benefit: 100 Persons Assisted
7	Public Services: Meals on Wheels	2014	2018	Public Services	Citywide	Non-housing Community Development	CDBG: \$7,500	Public service activities other than Low/Moderate Income Housing Benefit: 100 Persons Assisted
8	Public Services: CASA Child Advocacy	2014	2018	Public Services	Citywide	Non-housing Community Development	CDBG: \$15,000	Public service activities other than Low/Moderate Income Housing Benefit: 77 Persons Assisted

Table 6 – Goals Summary

### Goal Descriptions

1	<b>Goal Name</b>	Affordable Housing: Minor Repairs and Modification
	<b>Goal Description</b>	The Geographic Area Affordable housing: Minor Repair and Modification is Citywide
2	<b>Goal Name</b>	Public Facility and Infrastructure Improvements
	<b>Goal Description</b>	The Geographic Area for this goal is an area in a census tract that is at least 47.4% LMI.

3	<b>Goal Name</b>	Public Facility Imp.: Domestic Violence Shelter
	<b>Goal Description</b>	The Geographic Area for this goal is in a census tract with at least 47.4% LMI.
4	<b>Goal Name</b>	Public Services: Housing Assistance
	<b>Goal Description</b>	The Geographic Area for this public service is Citywide.
5	<b>Goal Name</b>	Public Services: Food Banks
	<b>Goal Description</b>	The Geographic Area for this Goal is Citywide.
6	<b>Goal Name</b>	Public Services: After School Tutoring
	<b>Goal Description</b>	The Geographic Area for this Goal is Citywide.
7	<b>Goal Name</b>	Public Services: Meals on Wheels
	<b>Goal Description</b>	The Geographic Area for this Goal is Citywide.
8	<b>Goal Name</b>	Public Services: CASA Child Advocacy
	<b>Goal Description</b>	The Geographic Area for this Goal is Citywide.

**Table 7 – Goal Descriptions**

**Estimate the number of extremely low-income, low-income, and moderate-income families to whom the jurisdiction will provide affordable housing as defined by HOME 91.215(b):**

The City of Round Rock does not receive HOME funds.

## AP-35 Projects – 91.220(d)

### Introduction

The Annual Action Plan reflects the City's funding priorities and identifies the projects that the City proposed to implement with funds from the U.S. Department of Housing and Urban Development's Community Development Block Grant (CDBG) Program. The funding is allocated according to the community's highest priority needs.

### Table 4 Projects

To ensure that CDBG funds are spent in a timely and expedient manner, the City has created an alternate list of projects that can be implemented if any of the originally identified projects for funding are unable to follow-through within the fiscal year (including public services without going over the 15% funding cap). These alternate projects are consistent with the Consolidated Plan. The following are the identified alternate projects: Round Rock Area Serving Center Food Pantry and Housing Assistance Programs; Single Family Rehabilitation (fund an agency to do home repairs); Park Improvements to Frontier Park that include replacement of existing trail, park pavilion, tennis court, fencing, lighting, concrete sidewalks and new walking trail, park benches, picnic tables, bike racks, trash receptacles and improvements to pedestrian bridge; neighborhood clean-up(s) in one or more of the following: Greenhill, Downtown, Mesa Ridge.

#	Project Name
1	Public Services
2	Shelter Rehabilitation
3	Single Family Rehab
4	Public Facilities and Improvements
5	City of Round Rock Program Administration

Table 8 – Project Information

### Describe the reasons for allocation priorities and any obstacles to addressing underserved needs

Allocations are made based on community needs and projects funded should meet a “High Priority Need” as identified in the Five Year Consolidated Plan.

## Projects

### AP-38 Projects Summary

#### Project Summary Information

Table 9 – Project Summary

<b>1</b>	<b>Project Name</b>	Public Services
	<b>Target Area</b>	Citywide
	<b>Goals Supported</b>	Public Services: Housing Assistance Public Services: Food Banks Public Services: After School Tutoring Public Services: Meals on Wheels Public Services: CASA Child Advocacy
	<b>Needs Addressed</b>	Non-housing Community Development
	<b>Funding</b>	CDBG: \$85,586
	<b>Description</b>	Funding will pay for public service activities that were approved in the 2015-2016 Annual Action Plan. Matrix codes: 05N, 05W, 05Q, 05A, 05
	<b>Target Date</b>	9/30/2016

<p><b>Estimate the number and type of families that will benefit from the proposed activities</b></p>	<p>Public Services:</p> <p>RRASC Housing Assistance: 250 unduplicated clients  Eligibility Criteria: 24 CFR 570.201 (e) Public Services  National Objective: 24 CFR 570.208 (a) (2) (B) LMI</p> <p>RRASC Food Pantry: 950 unduplicated clients  Eligibility Criteria: 24 CFR 570.201 (e) Public Services  National Objective: 24 CFR 570.208 (a) (2) (B) LMI</p> <p>RRHA Neighborhood Outreach Center: 100 unduplicated clients  Eligibility Criteria: 24 CFR 570.201 (e) Public Services  National Objective: 24 CFR 570.208 (a) (2) (B) LMI</p> <p>WBCO Meals on Wheels: 100 unduplicated clients  Eligibility Criteria: 24 CFR 570.201 (e) Public Services  National Objective: 24 CFR 570.208 (a) (2) (B) LMI</p> <p>CASA: 77 unduplicated clients  Eligibility Criteria: 24 CFR 570.201 (e) Public Services  National Objective: 24 CFR 570.208 (a) (2) (A) LMI Presumed</p>
<p><b>Location Description</b></p>	<p>Public Services:</p> <p>Food pantry and housing assistance: Round Rock Area Serving Center  1099 East Main Street Round Rock, TX 78664</p> <p>After school tutoring: Round Rock Housing Authority Neighborhood Outreach Center  1505 Lance Lane Round Rock, TX 78664</p> <p>Meals on Wheels: Alan R. Baca Senior Center and City wide Round Rock, TX 78664</p> <p>CASA: 805 West University Avenue Suite 111 Georgetown, TX 78626</p>

	<b>Planned Activities</b>	Funds will be used to provide the following public services to the low to moderate income residents of Round Rock: Round Rock Area Serving Center Housing Assistance Program will provide rent or mortgage payments for up to \$100 per client; the Round Rock Area Serving Center (RRASC) Food Pantry Program will assist with food; Round Rock Housing Authority Neighborhood Outreach Center will provide after school tutoring for the kids at the Round Rock Housing Authority; Williamson-Burnet Counties Opportunities Meals on Wheels Program will provide meals to homebound seniors and to seniors at the Alan R. Baca Senior Center, CASA Court Advocacy for Abused and Neglected Children will use funds to pay for the partial salary for the person that will recruit and train volunteers that will advocate for abused and neglected children in court (Volunteer Recruiter/Trainer Coordinator).
<b>2</b>	<b>Project Name</b>	Shelter Rehabilitation
	<b>Target Area</b>	N/A
	<b>Goals Supported</b>	Public Facility Imp.: Domestic Violence Shelter
	<b>Needs Addressed</b>	Non-housing Community Development
	<b>Funding</b>	CDBG: \$90,000
	<b>Description</b>	Funds will be used to rehab the Hope Alliance domestic violence shelter. These funds will be used along with CDBG Program Year 2014-2015 shelter rehab funds as well as funds from Williamson County CDBG in order to meet this goal. Improvements include replacement of entire flooring, all windows, total kitchen remodel, install attic insulation, replace closet doors and shelving in bedrooms, pantry and play areas, and replace security system
	<b>Target Date</b>	9/30/2016
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	Project will benefit 300 unduplicated low to moderate income persons that are presumed to be principally low and moderate income person. Eligibility Criteria: 24 CFR 570.201 (c) Public Facilities and Improvements (Shelter Rehab) National Objective: 24 CFR 570.208 (a) (2) (A) Presumed Clientele
	<b>Location Description</b>	1011 Gattis School Road Round Rock, TX
	<b>Planned Activities</b>	Funds will be used to rehabilitate the existing domestic violence shelter in Round Rock. Program year 2015-2016 CDBG funds will be combined with previous year (2014) CDBG funds as well as CDBG funds from Williamson County for this project.

<b>3</b>	<b>Project Name</b>	Single Family Rehab
	<b>Target Area</b>	Citywide
	<b>Goals Supported</b>	Affordable Housing: Minor Repairs and Modification
	<b>Needs Addressed</b>	Affordable Housing
	<b>Funding</b>	CDBG: \$5,874
	<b>Description</b>	Funds will be allocated to an agency that will do single family rehab (minor home repair) for the low to moderate income residents in Round Rock.
	<b>Target Date</b>	9/30/2016
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	1 low to moderate income household Elibility Criteria: 24 CFR 570.202 (a) National Objective: 24 CFR 570.208 (a) (3)
	<b>Location Description</b>	Citywide Round Rock, TX
	<b>Planned Activities</b>	These funds will be combined with prior year funds that were allocated to single family rehab in program year 2013 but were unallocated. Total funding including two years CDBG (2013 & 2015) will be \$50,713. CDBG 2015 funds will pay for the rehab for 1 home and CDBG 2013 funds will rehab 4 homes.
<b>4</b>	<b>Project Name</b>	Public Facilities and Improvements
	<b>Target Area</b>	LMI & LMA
	<b>Goals Supported</b>	Public Facility and Infrastructure Improvements
	<b>Needs Addressed</b>	Non-housing Community Development
	<b>Funding</b>	CDBG: \$275,000
	<b>Description</b>	Funding will be used to construct sidewalks at the Greenhill subdivision and for the purchase and installation of a shade structure, a playground fence extension and the addition of a trike trail at the Head Start.
	<b>Target Date</b>	9/30/2016

	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	<p>Sidewalks at Greenhill subdivision will benefit 238 households.</p> <p>Eligibility Criteria: 24 CFR 570.201 (c) Public Facilities and Improvements</p> <p>National Objective: 24 CFR 570.208 (a) (1) (i) Low to Moderate Income Area</p> <p>Head Start project will benefit 100 clients.</p> <p>Eligibility Criteria: 24 CFR 570.201 (c) Public Facilities and Improvements</p> <p>National Objective: 24 CFR 570.208 (a) (2) (B) Low to moderate income households that require information on family size and income</p>
	<b>Location Description</b>	<p>Greenhill subdivision to include construction of new sidewalks on the following streets: Northside of Ameswood, Southside of Barrhall, Eastside of Aberdeen, Westside of Bradmore, Westside of Denfield.</p> <p>Headstart: 1001 East Main Street</p>
	<b>Planned Activities</b>	<p>Funds will be used to construct new sidewalks in the Greenhill subdivision. Bid solicitation process will start late fall of 2015 and project completion is estimated Spring 2016.</p> <p>Funds will be used for the purchase and installation of the shade structure, fence extension and trike trail. This project will start in the spring 2016.</p>
<b>5</b>	<b>Project Name</b>	City of Round Rock Program Administration
	<b>Target Area</b>	N/A
	<b>Goals Supported</b>	N/A
	<b>Needs Addressed</b>	Non-housing Community Development Affordable Housing
	<b>Funding</b>	CDBG: \$114,115
	<b>Description</b>	Funds will be used for the oversight and administration of the CDBG program for the City of Round Rock.
	<b>Target Date</b>	9/30/2016
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	N/A: Administrative Activity
	<b>Location Description</b>	221 East Main Street Round Rock, TX 78664
<b>Planned Activities</b>	Administration and management of the CDBG Program	

**AP-50 Geographic Distribution – 91.220(f)**

**Description of the geographic areas of the entitlement (including areas of low-income and minority concentration) where assistance will be directed**

Priority CDBG funding areas in the City of Round Rock include those areas where there is a high rate of low to moderate income (LMI) persons.

The following are the LMI block groups within the City of Round Rock.

- Census tract:18.51/Block group:3/Persons:1165/50% LMI
- Census tract:18.51/Block group:4/Persons:1000/50% LMI
- Census tract:205.04/Block group:1/Persons:1055/66.14% LMI
- Census tract:205.04/Block group:2/Persons:920/49.33% LMI
- Census tract:205.04/Block group:4/Persons:1655/75.74% LMI
- Census tract:206.02/Block group:2/Persons:265/47.75% LMI
- Census tract:207.01/Block group:1/Persons:710/57.96% LMI
- Census tract:207.03/Block group:2/Persons:2025/54.22% LMI
- Census tract:207.04/Block group:2/Persons:1045/53.18% LMI
- Census tract:207.04/Block group:3/Persons:750/70.42% LMI
- Census tract:207.07/Block group:2/Persons:1095/71.34% LMI
- Census tract:208.03/Block group:1/Persons:1250/53.19% LMI
- Census tract:215.02/Block group:1/Persons:2425/62.02% LMI
- Census tract:215.02/Block group:2/Persons:850/79.44% LMI
- Census tract:215.03/Block group:1/Persons:1205/59.21% LMI
- Census tract:215.05/Block group:1/Persons:795/54.27% LMI

**Geographic Distribution**

Target Area	Percentage of Funds

**Table 10 - Geographic Distribution**

**Rationale for the priorities for allocating investments geographically**

The City of Round Rock estimates that 100% of the funds will be dedicated to projects in the target areas and that these funds assist a large number of low to moderate income residents.

Target Area: Low to Moderate Income (LMI) Areas

Percentage of Funds: 100%

## Affordable Housing

### AP-55 Affordable Housing – 91.220(g)

#### Introduction

The City of Round Rock will support two programs in FY 2015 (2015-2016) that support affordable housing. These include Housing Assistance Program through the Round Rock Area Serving Center (RRASC) that will assist up to 200 residents with \$100 for rent or mortgage per household, and a program through Habitat for Humanity of Williamson County for the minor home repair of low income residents of Round Rock up to \$10,000 per unit. Funds will be spent on the purchase of materials; volunteers will do the actual home repairs.

One Year Goals for the Number of Households to be Supported	
Homeless	0
Non-Homeless	0
Special-Needs	0
Total	0

**Table 11 - One Year Goals for Affordable Housing by Support Requirement**

One Year Goals for the Number of Households Supported Through	
Rental Assistance	250
The Production of New Units	0
Rehab of Existing Units	5
Acquisition of Existing Units	0
Total	255

**Table 12 - One Year Goals for Affordable Housing by Support Type**

#### Discussion

Habitat for Humanity will be funded with current year (2015) and a previous year (2013) CDBG funds for single family rehabilitation. With program year 2015 funds, 1 household will be assisted. With program year 2013 funds, 4 households will be assisted.

## **AP-60 Public Housing – 91.220(h)**

### **Introduction**

The Round Rock Housing Authority was established in 1966, with the first development built in 1972. Today, the Housing Authority owns 100 units and administers 209 Section 8 Housing Choice Vouchers.

### **Actions planned during the next year to address the needs to public housing**

The Round Rock Housing Authority receives approximately \$101,647 annually in Capital Fund Grants from HUD to provide for the maintenance and renovation needs of its public housing stock, which it considers to be in good condition.

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

A five member board, including a resident board member, oversees the Round Rock Housing Authority. The board is appointed by the Mayor and City Council. Each board member serves a two year term.

To meet RRHA's goal to promote self-sufficiency, the housing authority administers the family self-sufficiency (FSS) program. The FSS program continues to serve families in the Housing Choice Voucher (HCV) and Public Housing (PH) Programs. Present participants have completed the following goals:

- Obtaining or maintaining employment
- Continuing to pursue higher education
- Continue to maintain first time businesses with supportive mentorship and education

The unique value of the FSS program is that clients are able to receive supportive case management to reach their individual goals towards self-sufficiency.

Currently there are no public housing homeownership initiatives in place either under the public housing program or the Section 8 program.

### **If the PHA is designated as troubled, describe the manner in which financial assistance will be provided or other assistance**

The Round Rock Housing Authority is currently considered "Troubled" due to their last REAC inspection scores and because they missed the deadline in obligating the necessary site improvement funds for the year 2011. The Round Rock Housing Authority is currently working very hard to correct the deficiencies found in the physical inspection and have also developed a "Recovery Action Plan". They are optimistic

this plan will get them out of the troubled status very soon. In addition to this, they are in the process of contracting with the Austin Housing Authority subsidiary Blueprint Housing Solutions to assist them as they move from "Troubled to High Performing".

### **Discussion**

The housing authority continues to partner with several local agencies, faith-based organizations, the City, and the school district in order to bring resources to residents.

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## **AP-65 Homeless and Other Special Needs Activities – 91.220(i)**

### **Introduction**

The City of Round Rock and Williamson County are part of the Texas Balance of State Continuum of Care (BoS CoC). The BoS CoC is part of the Texas Homeless Network (THN), a non-profit membership-based organization helping Texas communities to prevent and end homelessness. THN is a 501 (c) (3) organization that is partially funded through the Texas Department of Housing and Community Affairs and Texas Department of State Health Services.

### **Describe the jurisdictions one-year goals and actions for reducing and ending homelessness including**

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

The City of Round Rock funds the Round Rock Area Serving Center with CDBG funds to assist residents in jeopardy of becoming homeless with housing and mortgage assistance. Sometimes the loss of a job or an illness can cause a family to fall behind on rent or mortgage which can lead to eviction. Funding the housing/mortgage assistance program is an action and goal that will assist with reducing homelessness.

In addition to CDBG funds, the City of Round Rock is using General Funds to pay for a staff member at Hope Alliance who counsels persons who might become homeless due to personal issues.

The following agencies reach out to homeless persons and assess their individual needs such as the need for temporary shelter, transitional housing and other services:

- The Williamson County Crisis Center (Hope Alliance) offers two housing programs to assist its clients. They offer a short-term, transitional housing program that helps families who are transitioning out of the shelter and a long term, supportive housing program.
- STARRY Emergency Shelter serves children who need immediate protection, typically after being removed from their home by court order due to life-threatening abuse or neglect.
- Lifeworks provides emergency shelter and transitional housing as well as counseling, education/workforce and youth development to youth and their families.
- Round Rock Area Serving Center provides emergency shelter, food and clothing vouchers, as well as mortgage and utility assistance, in an effort to prevent homelessness.
- CASA provides trained, court-appointed volunteers to advocate in the best interest of abused and neglected children on their journey to a safe, permanent home.

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

Hope Alliance and Williamson Burnet Counties Opportunities (WBCO) were both awarded Emergency

Food and Shelter Program (EFSP) Grants from FEMA. Hope Alliance is using these funds to provide emergency shelter, purchase food and aid toward the purchase of bedding and cleaning supplies and other like items for the domestic violence shelter. WBCO is using the EFSP funds to purchase food for

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the Senior Nutrition Program.

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

The City of Round Rock will continue to fund the Round Rock Area Serving Center for program year 2015-2016. Funding will be used to purchase food for the food pantry at the Round Rock Area Serving Center. The Round Rock Area Serving Center assists over 1,000 households with food every program year. In an effort to prevent homelessness, CDBG funding will also be allocated to the Round Rock Area Serving Center to provide mortgage and rent assistance to the residents of Round Rock.

**Helping low-income individuals and families avoid becoming homeless, especially extremely low-income individuals and families and those who are: 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); or, receiving assistance from public or private agencies that address housing, health, social services, employment, education, or youth needs.**

Homelessness is a regional issue and is best addressed countywide through the efforts of both Williamson and Travis Counties and local jurisdictions. Since Round Rock's emergency shelter only provides temporary facilities for displaced women and children, the City will work with area providers such as Bluebonnet Trails MHMR to address its share of the homeless need through facilities and services provided at the regional level.

## **Discussion**

Though Round Rock has a very small visible homeless population, the loss of a job, an increase in rent, an eviction or domestic violence situation can easily lead to homelessness for many low income individuals and families. Round Rock will continue to fund high priority activities that are concentrated on homeless prevention.

<b>One year goals for the number of households to be provided housing through the use of HOPWA for:</b>	
Short-term rent, mortgage, and utility assistance to prevent homelessness of the individual or family	0
Tenant-based rental assistance	0
Units provided in housing facilities (transitional or permanent) that are being developed, leased, or operated	0
Units provided in transitional short-term housing facilities developed, leased, or operated with HOPWA funds	0
<b>Total</b>	<b>0</b>

City of Round Rock does not receive Housing Opportunities for People with Aids (HOPWA) Funds.

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## **AP-75 Barriers to affordable housing – 91.220(j)**

### **Introduction**

In 2000, consultants from the University of Texas prepared a report titled "Analysis of Impediments to Fair Housing, Round Rock, Texas" (AI). This document provided a comprehensive review of the City's administrative and judicial policies. This study's assessment of the location, availability, and accessibility of housing will assist in planning to address impediments to fair and affordable housing. This analysis profiled the housing market in Round Rock, addressed housing affordability, physical condition of housing stock, and public housing. Barriers to affordable housing identified through the City's citizen participation process were:

- Lack of options
- Lack of transitional support, assistance needed for move-in costs/deposits
- Land prices
- Lack of community involvement and creativity in problem solving
- Negative neighborhood perception regarding low income housing
- Lack of public transportation

Identified policies impacting the development of affordable housing included the following:

- Inflexible development standards
- Lack of incentives for developers to construct affordable housing
- High development fees

The City of Round Rock CDBG staff refers anyone needing to file a housing discrimination complaint or needing information on fair housing to the Austin Tenants Council. The Austin Tenants Council Fair Housing Program helps any person who has been discriminated against in the rental, sale, financing or appraisal of housing. The state and federal Fair Housing Act prohibits discrimination because of a person's race, color, national origin, religion, sex, disability (mental or physical) or familial status. The Fair Housing Program documents and investigates complaints; provides advice about remedies under fair housing laws, and coordinates legal services to assist victims of housing discrimination. The Fair Housing Program provides fair housing seminars and presentations to interested parties.

The City of Round Rock CDBG Program planned to hire a consultant during the 2013 program year to conduct an updated Analysis of Impediments to Fair Housing. CDBG staff worked with the City purchasing department and requested proposals from consultants. Due to the high dollar amount of the proposals and to a tight budget, it was decided to conduct the study during this program year 2014. The City of Round Rock has now decided to wait until the new AFFH Assessment Tool for CPD entitlement grantees is approved to complete an Assessment of Fair Housing (AFH) under the proposed Affirmatively Furthering Fair Housing (AFFH) rule. CDBG staff discussed this option with Joe Castillo,

director of FHEO in the San Antonio HUD field office.

**Actions it planned 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**

See above.

### **Discussion**

The City of Round Rock Mayor, Alan McGraw and City Council proclaimed April 2015 as Fair Housing Month. A proclamation was signed for the CDBG office to display.

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## **AP-85 Other Actions – 91.220(k)**

### **Introduction**

The City of Round Rock will continue to work with partners in the region to improve the housing and employment opportunities for low and moderate income persons and other special populations.

### **Actions planned to address obstacles to meeting underserved needs**

Despite ongoing efforts, there still remains a number of significant obstacles to meeting underserved needs. The following obstacles to meeting these needs in Round Rock include:

- Population growth
- Cut backs in state and federal funding for basic needs and services
- High cost of housing
- Need for transportation to existing services and childcare available services

To address these needs, the City of Round Rock dedicated CDBG funds to the following:

Round Rock Area Serving Center:

1. For the purchase and distribution of food
2. To provide rent and mortgage assistance

Round Rock Housing Authority:

1. To pay for partial salaries for the resident services coordinator/facilitator and teachers at the Neighborhood Outreach Center (NOC) at the Round Rock Housing Authority

### **Actions planned to foster and maintain affordable housing**

The City of Round Rock will support two programs in FY 15 (2015-2016) that support affordable housing. These include the housing assistance program through the Round Rock Area Serving Center (RRASC) to assist residents with rent or mortgage at \$100 a household, and a program through Habitat for Humanity for the minor home repair of low income residents of Round Rock up to \$10,000 per unit. Funds will be spent on the purchase of materials and volunteers will do the actual home repairs. A plumber or electrician will be hired if needed.

### **Actions planned to reduce lead-based paint hazards**

The CDBG program has procedures in place to comply with the Residential Lead Based Paint Hazard Reduction Act of 1992 (Title X) and subsequent changes in September 1999. These procedures include

notification, identification, and treatment (if necessary).

Most of the development in Round Rock occurred after the use of the lead based paint was banned. HUD estimates that as many as 540 housing units in Round Rock built prior to 1970 and occupied by extremely low, low and moderate income households could contain lead-based paint.

### **Actions planned to reduce the number of poverty-level families**

The City's anti-poverty strategy is based on attracting a range of businesses and providing workforce development including job training services for low income residents.

Planned economic development and anti-poverty programs include:

- Friendly Rock Program to assist residents with utility bills
- Food Pantry Program provides residents access to food
- Foundation Communities Tax Center provides free tax preparation
- YMCA provides after school and summer scholarship dollars to low and moderate income families in Round Rock

### **Actions planned to develop institutional structure**

The City relies on a network of public sector, private sector, and non-profit organizations to implement the Strategic Plan, particularly to address homelessness and special needs.

### **Actions planned to enhance coordination between public and private housing and social service agencies**

In an effort to enhance coordination between public and private housing and social service agencies, the City of Round Rock CDBG staff will continue to attend the Williamson County Monthly Networking Meetings. These meetings are held the first Tuesday of every month at the Alan R. Baca Senior Center. Collaboration and coordination between agencies is important to ensure that the needs in the community are being addressed.

### **Discussion**

The City of Round Rock, Office of Community Development is responsible for the administration of the City's programs funded with CDBG funds. This office has the primary responsibility for managing and implementing the City's affordable housing and infrastructure program, the Consolidated and Annual Plans and related documents.

The City of Round Rock has developed a monitoring system to ensure that the activities carried out in the Plan are done so in a timely manner in accordance with the federal monitoring requirements of [24

CFR 570.501 (v)] and [24 CFR 85.40] and all other applicable laws, regulations, policies and sound management and accounting practices.

Sub-recipients are monitored to ensure that they have implemented and administered their CDBG funded activities according to applicable federal requirements. Particular attention is paid to compliance with management systems, procurement practices and compliance with civil rights requirements.

When applicable, sub-recipients are required to submit copies of paid receipts, timesheets, income documentation, client data and self-certification forms with their monthly requests. This information is used to determine the number of unduplicated beneficiaries. Monthly reports were submitted by each sub-recipient enabling staff to monitor the progress of each activity, provide technical assistance or consultation when needed and to ensure that all objectives are met.

The City of Round Rock conducts monitoring of sub-recipients every program year during the summer. Particular attention is paid to compliance with eligibility and national objective requirements. The HUD monitoring checklist is used during these on-site monitoring visits. The monitoring visits are conducted by Liz Alvarado, CDBG Coordinator and Olivia Riley, CPA, Finance Accounting Manager. Technical assistance is provided for sub-recipients at the beginning of the program year and anytime during the program year upon request.

Throughout the year staff conducts mini desk reviews of all sub-recipients. Sub-recipients are required to submit monthly progress reports and reimbursement requests by the 15th of every month. This allows the City to monitor the sub-recipients progress and spending on a monthly basis.

The City of Round Rock Office of Community Development maintains an open door policy for all agencies and frequent unofficial visits are made at participating agencies throughout the year.

## Program Specific Requirements

### AP-90 Program Specific Requirements – 91.220(I)(1,2,4)

#### Introduction

Projects planned with all CDBG funds expected to be available during the year are identified in the Projects Table. The following identifies program income that is available for use that is included in projects to be carried out.

#### Community Development Block Grant Program (CDBG)

##### Reference 24 CFR 91.220(I)(1)

Projects planned with all CDBG funds expected to be available during the year are identified in the Projects Table. The following identifies program income that is available for use that is included in projects to be carried out.

1. The total amount of program income that will have been received before the start of the next program year and that has not yet been reprogrammed	9,852
2. The amount of proceeds from section 108 loan guarantees that will be used during the year to address the priority needs and specific objectives identified in the grantee's strategic plan.	0
3. The amount of surplus funds from urban renewal settlements	0
4. The amount of any grant funds returned to the line of credit for which the planned use has not been included in a prior statement or plan	0
5. The amount of income from float-funded activities	0
<b>Total Program Income:</b>	<b>9,852</b>

#### Other CDBG Requirements

1. The amount of urgent need activities	0
2. The estimated percentage of CDBG funds that will be used for activities that benefit persons of low and moderate income. Overall Benefit - A consecutive period of one, two or three years may be used to determine that a minimum overall benefit of 70% of CDBG funds is used to benefit persons of low and moderate income. Specify the years covered that include this Annual Action Plan.	100.00%