



2020 Consolidated Annual Performance and Evaluation Report (CAPER)

DRAFT

Town of Stratford
Community and Economic Development
Stratford Town Hall
2725 Main Street
Stratford, CT 06615

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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.

As an Entitlement Community, the Town of Stratford receives an annual allocation of Community Development Block Grant (CDBG) program funds through the US Department of Housing and Urban Development (HUD) to address the housing and community development needs in the Town. The priority needs for the Town include the development and preservation of affordable housing, public facility and infrastructure improvements, and public services that primarily assist low- to moderate-income (LMI) and special needs populations.

For program year 2020, the Town received an allocation of \$614,806 in CDBG funds and this CAPER reports of the performance and evaluates the uses of these funds. Unfortunately, due to the COVID-19 pandemic the completion of the Town's 2020-2024 Consolidated Plan was delayed, and was recently submitted in July of 2021. The Town however still had several activities that were open and worked to complete them in the program year. These accomplishments are highlighted below.

Expand and Improve Public Facilities and Infrastructure: The Town assisted a total of 19,220 persons living in low/mod areas of the Stratford. Public facility improvements were made at Juliette Low Park such as installation of electricity at the park and the construction of a picnic shelter with outdoor grill. Public infrastructure improvements included a new walkway at Stonybrook Gardens and sidewalk improvements at various LMI areas in the Town.

Affordable Housing Preservation: The Town continued its commitment to affordable housing preservation with support for the Stratford Housing Authority's Vacant Unit Repair program. Minor repairs were made to apartments, including painting, in an effort to help decrease the turnaround time for vacant units. There were 56 LMI households assisted with this rehab activity.

Public Services for LMI and Special Needs: Public services targeted two groups in Stratford, which were LMI persons and the special needs population. There were 166 LMI persons assisted with vital public services such as employment training with Literacy Volunteers of Southern CT and housing counseling with Bridgeport Neighborhood Trust. For special needs, there were 173 persons assisted with domestic violence services at the Center for Family Justice and Emerge, Inc's PSH Homeless Survivors of Domestic Violence program.

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

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

Goal	Category	Source	Indicator	Unit of Measure	Expected – Strategic Plan	Actual – Strategic Plan	Percent Complete	Expected – Program Year	Actual – Program Year	Percent Complete
1A Expand and Improve Public Infrastructure	Non-Housing Community Development	CDBG	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	Persons Assisted	38875	12650	32.54%	7775	12650	162.70%
1B Improve Access to Public Facilities	Non-Housing Community Development	CDBG	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	Persons Assisted	38875	6570	17.36%	7775	6570	84.50%
2A Housing Rehabilitation	Affordable Housing	CDBG	Rental units rehabilitated	Household Housing Unit	250	56	22.40%	50	56	112.00%
2B Affordable Housing Opportunity	Affordable Housing	CDBG	Homeowner Housing Added	Household Housing Unit	5	0	0.00%			
3A Provide Supportive Services for Special Needs	Non-Homeless Special Needs	CDBG	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	1000	173	17.30%	200	173	86.50%
3B Provide Vital Services for LMI Households	Non-Housing Community Development	CDBG	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	1000	166	16.60%	200	166	83.00%

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

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

The Town of Stratford in its 2020-2024 ConPlan and first-year AAP has identified public facilities and infrastructure improvements, affordable housing development and preservation, and public services for low- to moderate-income (LMI) and special needs populations as its priorities. CDBG funds were used to address these high priority needs, and a number of objectives were completed as a result. Due to staff turnover and the circumstances around COVID-19, there was very little spending activity until the end of the program year and the Town was not able to spend most of its funds. Funds therefore were spent largely on activities that could be administered quickly which mostly consisted of public services and admin. The PR07 Drawdown Report reported the following fund expenditures in PY 2020 for each priority.

Expand/Improve Public Infrastructure & Facilities: \$2,970.75

Preserve & Expand Affordable Housing: \$0

Public Services: \$86,737.16

Administration: \$101,023.38

Overview of Goals Accomplished vs Established Goals

1A Expand and Improve Public Infrastructure: The Town had a goal of 7775 persons in low/mod areas that would benefit from activities. This goal was exceeded with 12650 persons in low/mod areas. Public infrastructure improvements included a new walkway at Stonybrook Gardens and sidewalk improvements at various LMI areas in the Town.

1B Improve Access to Public Facilities: The Town had a goal of 7775 persons in low/mod areas that would benefit from activities, and made improvements that benefit 6570 persons in low/mod areas. Public facility improvements were made at Juliette Low Park such as installation of electricity at the park and the construction of a picnic shelter with outdoor grill. This goal would have been met if timeliness issues were met at the Johnson Field Splash Pad improvement site.

2A Housing Rehabilitation: The Town had a goal of 50 rental units rehabbed and assisted 56 LMI households with the Stratford Housing Authority and their vacant unit repair program. The goal is to help make minor repairs in vacant rental units to reduce the turnaround time to get LMI households housed.

2B Affordable Housing Opportunity: This goal was included in the 5-Year Strategic Plan for future use in the ConPlan. There was no goal for this in

PY 2020.

3A Provide Supportive Services for Special Needs: There was a goal to provide services for 200 special needs persons. The Town funded service providers that assisted 173 victims of domestic violence.

3B Provide Vital Services for LMI Households: There was a goal to provide services for 200 LMI persons. The Town funded service providers that assisted 166 LMI persons with vital public services such as employment training and housing counseling.

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	232
Black or African American	77
Asian	29
American Indian or American Native	3
Native Hawaiian or Other Pacific Islander	1
Total	342
Hispanic	110
Not Hispanic	232

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

Narrative

DATA NOTE: The IDIS reporting system does not include a category row for “other and multi-racial” households so these groups were not counted in the race table above. Also, the Town conducted activities for the CDBG program such as public improvements that had a benefit for residents living in low/mod areas in the Town, and were also not captured in the table above. The table above only represents activities that the Town or service providers were able to collect race/ethnicity data, most likely through an application and intake process, and therefore total race/ethnicity numbers will not equal the total number of persons served reported in this CAPER.

According to the 2015-2019 ACS, the majority of the Town’s residents identify racially as white with 73.1%. The minority races were 16.6% black, 2.4% Asian, 0.1% Native American/Alaskan Native, and Native Hawaiian or Pacific Islander with 0.1%. Ethnically, 18% of the population in Stratford identified as Hispanic.

CDBG racial/ethnic data was provided by the PR-23 Summary of Accomplishments report. As reported in the table above, the demographic profile of persons assisted through the CDBG program are generally representative of the Town’s general population demographics. For minority groups assisted through CDBG activities 22.5% were Black, 8.5% were Asian and American Indian/Alaskan Native and Native Hawaiian or Pacific Islander were both less than 1%. Those who identified ethnically as Hispanic were 32.2%. According to these figures, the Town adequately worked to assist minority race/ethnic groups in the program year.

Needs Assessment

The Needs Assessment in the 2020-2024 Consolidated Plan, assesses if any racial and ethnic group by

income category has a disproportionate need in the area with regards to housing problems, severe housing problems and cost burden. Households with housing problems are those that reside in units lacking complete kitchen and plumbing facilities as well as overcrowding (more than one person per room) and cost burden (spending 30% or more of income on housing per month). Households with “severe housing problems” are those that reside in units lacking complete kitchen and plumbing facilities as well as severely overcrowded homes (more than 1.5 person per room) and severe cost burden (spending 50% or more of income on housing per month).

According to the Needs Assessment, minority race groups that have a disproportionate need in housing problems are extremely low-income Asian households, very low-income American Indian and Alaska Native households and Hispanic households and low-income Black or African American households.

Minority race groups that have a disproportionate need in “severe housing problems” are extremely low-income Asian households and very low-income American Indian and Alaska Native households.

For housing cost burden, Black or African American households have a disproportionate need with housing cost burden (30% of income towards housing costs). There were no minority groups that had a disproportionate need with “severe housing cost burden” (50% or more of income towards housing costs).

In comparing the disproportionate needs of certain race/ethnic groups as described by the Needs Assessment to the beneficiary outcomes provided, the Town has adequately provided services for Black and African American and Hispanic Households, however Asian households are still in need of housing assistance. Of the 56 households assisted with housing services in PY 2020, 19 were Black or African American (34%) and 23 were Hispanic (41%). There were no Asian households assisted. It should be noted that all other race groups were very small.

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	614,806	190,731

Table 3 - Resources Made Available

Narrative

In PY 2020 there was \$614,806 in CDBG FY allocation funds made available to the Town. According to the PR07 Drawdown Report the Town expended \$190,731. These funds went towards public improvements to sidewalks, affordable housing rehab, public services for special needs and LMI households and admin of the CDBG program. The Town had staff turnover and delays due to COVID-19, and most of the draws were made towards the end of the program year. The Town is working to spend all remaining funds with service providers, the SHA and public facility and infrastructure projects.

CARES Act Funds:

The Town of Stratford received a total of \$670,251 in CDBG-CV grant funds to fund activities that prevent, prepare for and respond to the COVID-19 pandemic. In PY 2020, the Town expended \$393,865 in CDBG-CV funds towards vital public services such as food programs and family care to help citizens during the pandemic and the Stratford Microenterprise Assistance Program to assist small businesses that were negatively affected by the pandemic.

Identify the geographic distribution and location of investments

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

Table 4 – Identify the geographic distribution and location of investments

Narrative

The Town of Stratford does not allocate funding based solely on geographic requirements. When the project or planned activities are intended to serve individuals or households directly, beneficiaries must meet income and residency requirements in order to receive assistance. CDBG program funds are utilized to develop programs and activities that primarily provide assistance to low- and moderate-income residents and benefit the Town as a whole in improving the quality of life for the residents. Eligible public facilities & infrastructure improvement activities the in the Town were targeted towards town-wide Low/Mod Block Group Tracts.

Leveraging

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

The Town of Stratford continues to seek projects/activities whereby the use of CDBG funding has leveraged additional state and local resources. In recent years, this strategy has allowed the Town to pursue a variety of projects, including but not limited to a historic restoration project with the Connecticut Air and Space Center, a major clearance project, and a storm water drainage project. Additional funding often comes from State or municipal resources, however, CDBG investments have leveraged private funding as well, including matches by subrecipients. For examples Emerge, Inc. has leveraged funds from the Stratford Housing Authority Section 8 Program, the Dillon Fund, Stratford Rotary Club, The Mayor's Charity Golf Tournament, The Petit Family Foundation, and People's United Community Foundation. The Center for Family Justice with the help of CDBG has leveraged in the past a total of \$1.3 million in sources including CCADV funding, CONNSACS funding, and DCF funds. The Stratford Housing Authority has used federal grants including CDBG grants from the Town to leverage application for local grants and other funds. CDBG funds were also used to help organizations such as the South End Community Center, Stratford Community Services Youth and Family Counseling, and Sterling House Community Center to leverage Town general funds. The Town will continue investing in projects where CDBG dollars can be used to leverage additional local, state and private funding, thereby maximizing the impact and investment in the community.

Publicly Owned Land or Property Used to Address Needs in the Plan

The Town targeted sidewalks and walkways located in LMI areas to improve the quality of life of residents. These locations were at Larkin Ct and the Stoneybrook Gardens walkway. Improvements were also made to Juliette Park.

It remains the goal of the Town to have inactive commercial and residential properties redeveloped in the effort to grow the tax base, thereby reducing the tax burden on residents and simultaneously resulting in lower cost burdens, especially for low/mod residents. The Town is currently reviewing these properties, and if identified, they may be utilized in future plans.

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	50	56
Number of Special-Needs households to be provided affordable housing units	0	0
Total	50	56

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	50	56
Number of households supported through Acquisition of Existing Units	0	0
Total	50	56

Table 6 – Number of Households Supported

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

The Town of Stratford had a goal to assist 50 LMI households with rental housing rehab activities and exceeded this goal with 56 LMI households assisted. This was accomplished through funding to support the Stratford Housing Authority's (SHA) Vacant Unit Repair program. Rehab activities included minor repairs that were made to SHA apartment units, including painting, in an effort to help decrease the turnaround time for vacant units. The goal was to make affordable housing units more readily available and ready to move-in for LMI households in Stratford. This assistance is also vital to help LMI households avoid homelessness.

Discuss how these outcomes will impact future annual action plans.

The preservation of existing affordable housing units remains one of the highest priorities for the Town of Stratford. Funding the SHA’s Vacant Unit Repair program has provided successful outcomes in assisting LMI households with this need as the rehab of vacant SHA apartment units has helped to house individuals and families quickly. Housing rehab activities were also expanded to assist the SHA rehabilitate and improve their Shiloh Gardens Housing development as well as Emerge Inc. with minor rehabilitation of their permanent supportive housing for homeless survivors of domestic violence. These rehab activities will be added to future AAPs and accomplishments will be reported in upcoming CAPER reports.

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
Extremely Low-income	37
Low-income	19
Moderate-income	0
Total	56

Table 7 – Number of Households Served

Narrative Information

Through housing rehab activities with the SHA Vacant Unit Repair program, the Town was able to assist 56 LMI households attain affordable rental housing. By income category, there were 37 extremely low-income and 19 low-income households assisted. The SHA provides eligible income limits by household size on its website for participants who seek to qualify and receive rental assistance. These income limits are based on HUD’s FY Income Limits Documentation System which is updated annually.

Worst Case Needs

Those with worst case needs are individuals or households at-risk of or experiencing homelessness and/or are extremely low-income renters. Extremely low-income renter households are at imminent risk of homelessness as they lack the funds to maintain housing during emergency and times of crisis. According to CHAS data reported in the Town’s 2020-2024 Consolidated Plan needs assessment, there are approximately 725 extremely low-income renters (0-30% AMI) in Stratford that are also severely cost burdened (households paying 50% of income towards housing costs).

To address this need, the Town has partnered with the SHA to complete rental housing rehab activities as mentioned above. The goal is to increase the availability of affordable rental units in the Town and help provide added relief for extremely low-income households seeking housing.

The Town refers to the SHA and its application and waiting list process to assist eligible persons with a disability seeking affordable housing in Stratford. As an equal housing opportunity provider, households

with a disability are eligible with SHA programs and the housing authority will make all necessary accommodations within reason to meet the needs of the household. Currently, Town CDBG funding was provided for the SHA's ongoing Shiloh Gardens Improvements. This funding helps the SHA in its efforts to preserve the housing authority's and ultimately the Town's affordable housing stock. Site improvements were planned for throughout the development including three (3) ADA compliant efficiency units. This project provides a direct benefit to low- and moderate-income persons, and improves the safety and accessibility of the development for residents, who are LMI and disabled.

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

Town staff attend quarterly meetings of the Opening Doors of Fairfield County (ODFC) CoC, and provide assistance with connection to the initiatives carried out by the CoC. As an active participant, the Town hopes to assist in every effort and capacity available, and looks to provide continued guidance and assistance during the CoC's required Point-In-Time (PIT) Count, other counts of sheltered and unsheltered homeless persons, and other initiatives carried out by the CoC. The Town supports the CoC's goal of ending homelessness.

The Town of Stratford also continues to support the overall goal of the Homeless Emergency Assistance and Rapid Transition to Housing (HEARTH) Act of 2009 (and MAP-21, 2012), so as to ensure that no family is homeless for more than 30 days. Activities include providing outreach and technical assistance through coordination, outreach, and assessment. To make these activities more effective, the Town will continue to work with the CoC ODFC as mentioned above, and collaborate with organizations such as Supportive Housing Works, Emerge, Inc., Stratford Community Services; Stratford Senior Services; and Sterling House Community Center (SECC).

Addressing the emergency shelter and transitional housing needs of homeless persons

The Town continues to focus its efforts of helping transitional housing providers reallocate their existing McKinney-Vento funding, and apply for a new permanent housing project. The Town has continued to commit funds to Emerge, Inc. and support their service operations in their permanent supportive housing for homeless survivors of domestic violence. The Town also helps to fund Emerge with minor rehabilitation of permanent supportive housing for this population.

The funds that help to support the operation of Emerge, Inc. help to provide safe, stable housing for families with low rents and necessary support service. As mentioned above this benefit is extended towards low-income homeless survivors of domestic violence and their children. Specific services include: mentoring, counseling, and budgeting for mothers to help them live independent lives, thereby not being forced to return to homelessness or an abusive relationship. An added benefit of low rents helps the families to save and prepare for independent living while acquiring the skills needed to accomplish self-sufficiency. In summary, the CDBG public service funds provide much needed assistance for the needs of survivors of domestic violence.

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

Regarding homelessness, several of the public services, including Emerge, receive funding which include the improvement public services that help individuals and families avoid becoming homeless or return to homelessness. These services often help improve their quality of life and then work to transition them to independent living. The goals and efforts developed by Emerge with homeless individuals and families help to continue assisting them to meet their unique needs at the time of release from systems of care. Subrecipients such as Bridgeport Neighborhood Trust (BNT) also provide critical comprehensive housing counseling services by educating low- and moderate-income families so as to help with foreclosure prevention.

With regard to assistance for those with special needs, the Town of Stratford has provided funding for the Center for Family Justice (Advocacy, Case Management, and MDT Services) and Literacy Volunteers of Southern CT (Strengthening English in Adults Program). It is anticipated that a significant number of elderly, frail elderly, and other disabled persons will receive assistance through the Town's various agencies and their programs. LMI households also continue to receive housing assistance through the Stratford Housing Authority's Vacant Unit Repair Program and its Shiloh Improvements Project.

Overall, the Town believes that its efforts to address the needs of the homeless population in and around Stratford, as well as those persons with other special needs, remain robust and effective. The Town will continue to increase its efforts when possible in an effort to provide increased or improved assistance to the community with a goal to end homelessness.

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 Town continues to work with the ODFC CoC in an effort to identify other ways to assist and help homeless persons make the transition to permanent housing and independent living. Furthermore, the Town's ongoing and continued support of Emerge, Inc., provides housing and assistance for chronically homeless victims of domestic violence and their families which are in need of these services.

In the program year, the Town funded domestic violence services that assisted 173 persons at the Center

for Family Justice and Emerge, Inc's PSH Homeless Survivors of Domestic Violence program. The Center for Family Justice is a domestic abuse treatment center and provides free crisis services. Emerge, Inc's PSH Homeless Survivors of Domestic Violence program offers permanent supportive housing options for female survivors of domestic violence and their children. Most services are provided in-house including rehabilitation programs, counseling, parenting skills, employment assistance and money management. Through these programs, affected individuals and families receive the assistance needed to help them avoid homelessness, and transition to permanent housing.

The Town also funds the SHA's Vacant Unit Repair program. Rehab activities to make repairs to vacant units help decrease the turnaround time of these units therefore making them more readily available and ready to move-in for LMI households in Stratford. This assistance is vital to help LMI households avoid homelessness, and may also shorten the time they experience homelessness.

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

Actions taken to address the needs of public housing

Funds were allocated to assist the Stratford Housing Authority (SHA) with reducing the turnover time for vacated public housing units. The SHA's vacant unit repair program makes repairs to vacated units, beyond those typically considered routine maintenance, in an effort to help the Housing Authority meet the HUD performance standard for re-occupancy and thereby making more Housing Authority units available to those in need of affordable housing. By assisting the Housing Authority in its effort to meet the HUD optimum unit turn-around of twenty (20) days or less, units can be prepared as quickly as possible to help expedite the leasing of apartments for waiting low-income and elderly families. Continued support for SHA help to improve its average of 9-15% vacancy rate per year, or 47-68 apartments.

Funding was also provided for the SHA's ongoing Shiloh Gardens Improvements. This funding helps the SHA in its efforts to preserve the housing authority's and ultimately the Town's affordable housing stock. Site improvements were planned for throughout the development. Shiloh Gardens provides housing for elderly residents, and offers 60 apartments, including: 17 efficiency; 40 one-bedroom; and three (3) ADA compliant efficiency units. This project provides a direct benefit to low- and moderate-income persons, focus on the Plan's housing goals, and improves the safety of the residents, who are LMI and disabled.

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

The Stratford Housing Authority encourages public housing residents to become more involved in management through inviting residents to provide input and public comments on its annual plans. Public housing residents can also participate through attending public hearings.

The Town Council, Stratford Housing Authority, other Town departments and the local business community which form the Stratford Housing Partnership helped to prepare a new report called the Housing Strategies for Stratford. This report is intended to outline strategies and recommendations as part of a long-range plan to address housing needs in Stratford. The goal is to provide a variety of housing choices for people and households of all ages and characteristics, and this includes developing more units for vulnerable residents of the SHA as well as increased participation in homeownership for all residents. The general public as well as public housing residents were invited to provide input on the report.

Actions taken to provide assistance to troubled PHAs

The Stratford Housing Authority is a 'high performer,' and is not designated as troubled under 24 CFR part 902. This subsection is not applicable.

CR-35 - Other Actions 91.220(j)-(k); 91.320(i)-(j)

Actions taken to remove or ameliorate the negative effects of public policies that serve as barriers to affordable housing such as land use controls, tax policies affecting land, zoning ordinances, building codes, fees and charges, growth limitations, and policies affecting the return on residential investment. 91.220 (j); 91.320 (i)

The Stratford Housing Partnership (SHP) was established in 1990, and continues to work on various issues related to the reduction of barriers to affordable housing in the Town of Stratford. Specifically, the SHP has focused on the identification of zoning policies, which may be a barrier to affordable housing; the identification and examination of housing needs; and the identification of potential Town- or State-owned lands appropriate for affordable housing development.

As referenced in the Town's Consolidated Plan, housing cost burden and housing affordability have been identified as the greatest impediment to LMI residents in the Town of Stratford. The Town recognizes the need to expand its tax base and provide decent housing for all of its residents, and will continue to work toward the development of public policies that address the affordable housing issues and housing cost burden. Through these activities, the Town will further established affordable housing goals and assist low/mod households and areas.

Some of the activities in from the CDBG program work directly to address these housing issues in Stratford. The Town has continued to provide funding for affordable housing preservation. Specifically, the Town continues to support the vacant unit repair program at the Stratford Housing Authority (SHA). The funding is a continuation from previous program years. The Town has also provided supplemental funding for the SHA Shiloh Gardens Improvement Project. These activities help to maintain the SHA's affordable housing inventory, and ultimately the Town's affordable housing stock.

The Town has also funded a pre-purchase education and foreclosure service provided by Bridgeport Neighborhood Trust (BNT) in an effort to assist low- and moderate-income families in taking steps to achieve and sustain homeownership in Stratford. Further, the Town has also funded Emerge by providing assistance for operations, allowing cost burdened and homeless, vulnerable residents to remain in affordable housing units.

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

One of the strategies of the Town of Stratford to address obstacles in meeting underserved needs is to partner with local private and public organizations.

For example, LMI households, and in particular extremely low-income households, are in need of affordable housing and are at risk of homelessness. To better address this need, the Town works closely with the Stratford Housing Authority (SHA) to increase affordable housing in Stratford. The SHA has affordable apartment units that become available after a tenant leaves, however due to limited funds

these units cannot always be returned to suitable conditions in a timely manner. Therefore, Town funds the SHA's Vacant Unit Repair program as mentioned above and in the PHA section, which makes repairs to these units in an effort to help decrease the turnaround time for vacant units. This helps to make affordable housing units more readily available for LMI households. There were 56 LMI households assisted with this rehab activity and 66% were extremely low-income which makes this a vital and necessary partnership.

The activities undertaken in this CAPER worked directly to address the underserved needs in Stratford, and that was through the help of experienced service providers who have the capacity to help identified groups with need. LMI persons assisted with vital public services such as employment training with Literacy Volunteers of Southern CT and housing counseling with Bridgeport Neighborhood Trust. Domestic violence services were provided at the Center for Family Justice and Emerge, Inc's PSH Homeless Survivors of Domestic Violence program. These services helped to improve the quality of life for residents in Stratford.

The Town will continue to further its efforts in addressing these needs by meeting regularly with private and public agencies that are involved in carrying out specific aspects of the Annual Action Plans. Through partnerships with service and housing providers, the Town will be able to better address the obstacles in meeting underserved needs.

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

The Town of Stratford remains committed to the reduction of lead-based paint hazards. Through the Town's Department of Public Health, housing units undergo testing when poisonings are reported; and testing is conducted when other rehab is carried out and painted surfaces are disturbed or lead is suspected (pre-1978 builds). The use of lead based paint (LBP) in homes was banned in 1978. Any home built prior to 1978 may contain lead paint; and older homes built prior to 1950 are very likely to contain LBP. While the 2020 program year does not provide funding for the Residential Rehabilitation program, other housing projects are being carried out, as referenced herein.

As part of the aforementioned housing rehab program, and the Department's procedures appertaining to housing rehab, the Town tests properties, as appropriate, when painted surfaces are being disturbed and the presence of lead is suspected: housing units that are built pre-1978. Under the current program guidelines and Department's procedures, where a typical loan is up to \$20,000, a household is eligible for a loan of up to \$25,000 when lead hazard control or abatement treatments are involved or required.

With regard to evaluating and reducing lead-based paint hazards during the 2020 Program Year, the Town of Stratford will continue to perform lead-based paint hazard control measures for projects where CDBG funds are used to assist in the rehab of single- and multi-housing units built before 1978; and especially units where children, aged six years and under, reside. All measures used to evaluate and reduce lead-

based paint hazards will be done in accordance with 24 CFR Part 35 (the Lead Safe Housing Rule).

Funds are used to establish and support a Lead Hazard Reduction Program provided by the Stratford Health Department. The program helps to identify LBP hazards in owner- and renter-occupied, income eligible households; and by providing financial assistance to address lead hazards including abating and remediation to allow for and provide safer homes for low- and moderate-income families with young children, and families with lead poisoned children. The program is aimed to help families and children who have been lead poisoned or who are at risk of lead poisoning by providing funding assistance to help families/property owners safely correct lead hazards. The Health Department staffs certified lead inspector/risk assessors who will oversee the program/process. The Community Development Administrator works closely with the Town's Health Department to develop applicable program guidelines and outreach.

In accordance with the above referenced sections regarding lead-based paint evaluation and reduction, the Office of Community Development has continued to regularly work with the Stratford Health Department in its efforts to evaluate and reduce hazards where applicable/when necessary.

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

In an effort to reduce the number of poverty-level families, the Town's CDBG program once again funded several public services during the program year, ranging from support for a pre-purchase education and foreclosure prevention service, to a food pantry and other services at the South End Community Center (SECC). The Town has funded and will continue to work with the literacy program provided by the Literacy Volunteers of Southern CT. While several of these programs have not yet started as the Consolidated Plan was just recently completed and submitted in July of 2021, the Town and services providers are already planning and prepared to start these activities.

By continuing to emphasize programs designed to improve family functioning, the Town is able to further enhance services directed toward impoverished youth and their families, as well as attempt to target those at risk and assist with prevention. While poverty is a difficult problem to address due to limited funding available through the CDBG program, the Town has continued to seek resources in an effort to expand supportive housing and public service programs to address poverty within the Town of Stratford and the surrounding community.

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

The Town's plans to develop its institutional structure remain unchanged from prior years. Specifically, the Community Development Administrator continues to work and coordinate with the Community Development Subcommittee, Town Departments, and other organizations responsible for carrying out the activities funded in the action plan during the program year.

Additionally, as discussed in prior years, an effort to establish a new CDBG advisory committee has been

taken up once again. The establishment of a new lead agency would allow for a full complement of members on the new agency, further developing the Town's institutional structure. Additionally, the Community Development Administrator continues development of an in depth and comprehensive policy and procedure manual for the CDBG program, including a Subrecipient guide manual and other resources for subrecipients to better understand and implement the Town's program. Some of these materials are currently available for subrecipients on the Town CDBG website; and they will be available for subrecipients at training sessions annually.

Further, the Community Development Administrator regularly meets with the Office of the Mayor and Chief Administrative Officer to discuss projects and program issues. Through this coordination, the Town is able to enhance its delivery of services in order to meet its established goals. Additionally, through citizen participation, the Town is able to effectively reach out to numerous individuals and organizations regarding information about the program including the application process.

By working with several Town departments, such as Health and Community Services, the Town is able to expand its reach by accessing the resources of other local, regional, and statewide resources for housing and non-housing services

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

The Community Development Administrator regularly meets on an ongoing basis with other Town Departments and the Stratford Housing Authority.

The Community Development Department, through the Economic & Community Development, is part of the Stratford Housing Partnership, which includes the Town Council, SHA, and other Town departments and commissions. The department will continue to be engaged with the partnership. This partnership is responsible for the strategies developed through the Town's Housing Strategies for Stratford report, which outline strategies and recommendations as part of a long-range plan to address housing needs in Stratford. The goal is to provide a variety of housing choices for people and households of all ages and characteristics.

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 2012, Stratford updated its Analysis of Impediments to Fair Housing Choice (AI), and identified the following impediments:

1. Monthly cost burden and housing affordability;
2. Insufficient flexibility in the Town Affordable Housing Development zoning regulations;
3. Lack of housing alternatives for disabled individuals who are willing and able to live in the community;
4. Negative public opinion about affordable housing;

5. Lack of significant vacant land for new housing development;
6. New deed restriction requirements of the State affordable housing law (Section 8-30g);
7. Unequal treatment of deed-restricted affordable housing by the Tax Assessor;
8. The term limits ordinance prevents local land use commissions from developing the expertise needed to address long-term planning and development issues.

In the analysis, cost burden and housing affordability were identified as the greatest impediment to lower income residents in Stratford. This is also referenced in the Town's 2020-2024 ConPlan that cost burden and housing affordability have been identified as the greatest impediment to low income residents in the Town of Stratford.

Actions Taken to Address Impediments to Fair Housing Choice

In an effort to address this issue, the Stratford Housing Partnership (SHP) was established in 1990, and continues to work on various issues related to the reduction of barriers to affordable housing in the Town of Stratford. Specifically, the SHP has focused on the identification of zoning policies, which may be a barrier to affordable housing; the identification and examination of housing needs; and the identification of potential Town- or State-owned lands appropriate for affordable housing development. In the program year, the SHP developed the 2021-2026 Housing Strategies for Stratford which outlines strategies and recommendations for a long-range plan to address housing needs in Stratford.

Affordable housing preservation activities such as rental housing rehab with the Stratford Housing Authority was to help maintain affordable housing units in the Town. Minor repairs were made to apartments, including painting, in an effort to help decrease the turnaround time for vacant units. There were 56 LMI households assisted with this rehab activity.

A portion of the 2020 CDBG FY allocation funding was targeted for the SHA's ongoing Shiloh Gardens Improvements. Site improvements were planned for throughout the development including three (3) ADA compliant efficiency units for households with a disability. The improvements will help to provide safety and accessibility of the development for disabled residents.

With limited funds, the Town will continue to prioritize and fund activities that help to further housing affordability and reduce cost burden in Stratford.

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 Community Development (CD) Subcommittee of the Economic and CD Commission, utilizing the staff resources of the Department of Community/Economic Development, is responsible for monitoring the use of CDBG funds. Specifically, the CD Administrator prepares subrecipient agreements for projects that are implemented by agencies other than the Town of Stratford. The prepared agreements provide the following: scope of services; project/activity budget; anticipated project schedule; compliance issues; and the required administrative records, reports, and information requirements. A beneficiary form to capture accomplishments is updated annually and used by the organization/agency to record participant data. Information received via quarterly reporting and other methods is used to assist in the preparation of the CAPER report.

Technical assistance is provided so that recipients may meet reporting requirements, project schedules, and achieve performance objectives. The CD Administrator will implement subrecipient manuals and guidelines in an effort to further assist the program and its recipients. The Town holds application and subrecipient workshops, and it is anticipated that these trainings will continue annually.

Regarding subrecipient monitoring procedures, the Town includes a log in each subrecipient's main file that enables it to track its informal and formal monitoring of, and contact with subrecipients. The Town regularly monitors each subrecipient by telephone/email correspondence and records each contact in the subrecipient's file. Much of this off-site monitoring consists of review of invoices and progress reports and ensuring that the program goals stated in the subrecipient's original application are being fulfilled as per the terms of the subrecipient agreement.

There is a regular schedule for on-site monitoring, which is helpful for noting areas of improvement for internal controls and record keeping. Follow-up visits are typically conducted. Subrecipients in need of performance improvements may require added on-site monitoring until performance is deemed satisfactory. The department will adjust for a virtual/phone monitoring should COVID-19 continue to negatively impact site visits.

The Town has updated its conflict of interest policy and procedures, as well as a policy to ensure that all prime and subcontractors are checked in the System for Award Management (SAM). Further, the Town continues its development of a policy and procedures manual, in addition to a subrecipient checklist and manual.

The Town will continue to work with local businesses to attract and retain businesses, in particular minority-owned and women-owned businesses. As applicable, the Town will remain in compliance with Section 3 regulations.

The ConPlan is developed every 5 years, with a Strategic Plan that has identified priority needs and goals. Each year of the 5-Year plan, the Town develops an AAP which identifies the projects and activities that will address and further the goals of the plan. This plan is required to be submitted to and approved by HUD each year to receive the CDBG FY allocation. At the end of each program year, the Town will report on the accomplishments and performance of the program as well as the use of funds through the CAPER.

With regard to providing citizens with reasonable notice and an opportunity to comment on HUD plans and performance reports, the Town has a citizen participation process that follows an adopted Citizen Participation Plan. Citizen participation is required in the development of each of the planning stages as per 24 CFR 91.105.

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.

Notice was given in the local newspaper that a draft of the 2020 (PY46) Consolidated Annual Performance and Evaluation Report (CAPER) for the Town of Stratford has been completed and would be available for a 15-day public review period.

Citizens are invited to review and make comments on the draft CAPER for a period of 15 days starting **October 4, 2021 and ending on October 18, 2021**. A copy of the draft is available for review during regular business hours from 8:00 AM to 4:30 PM, Monday through Friday at the Department of Community/Economic Development, 2725 Main Street, Room 118, Stratford, Connecticut 06615 and/or at the Town's website at <https://www.stratfordct.gov/cdbg>. Careful consideration is given to all comments received during the public review and comment period in accordance with the Town's Citizen Participation Plan.

Public comments may be addressed to Tara Petrocelli, the Director of Community Development, at the Office of Community Development, Room 118, 2725 Main Street, Stratford, CT, 06615 or email at tpetrocelli@townofstratford.com.

ADA Compliance & Language Assistance: Any individual with a disability who needs special assistance to participate should contact the ADA Coordinator, Susan Pawluk, at (203) 385-4020 or (203) 385-4022 (TDD) within five (5) days of assistance. For non-English speaking language assistance, please contact Tara Petrocelli, at (203) 381-2049 or email at tpetrocelli@townofstratford.com.

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.

This PY 2020 CAPER reports on the first year of the 5-Year 2020-2024 Consolidated Plan and first-year AAP. At this time there are no changes to the overall strategies of the 5-Year Strategic Plan including the priority needs and goals identified in this plan. The Town has been successful in implementing its current activities to meet its established goals and anticipates this will continue each year.

In future Annual Action Plans the Town may make adjustments to the goal outcome indicators, such as persons or households assisted, and/or an increase or decrease in estimates as necessary when identifying activities for already established goals. For example, the Town only reported rehab activities with the SHA's Vacant Unit Repair program however as rehab activities get added such as the rehab at the SHA Shiloh Gardens development and Emerge Inc.'s permanent supportive housing units, the Town will increase the estimates to serving LMI households with rehab.

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

No