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Consolidated Annual Performance and Evaluation Report (CAPER)

July 1, 2020 – June 30, 2021

City of Lewiston, Maine
Economic and Community Development Department
Community Development Program
27 Pine Street
Lewiston, ME 04240
www.lewistonmaine.gov

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.

This CAPER is for Year 1 of the City of Lewiston's 2020-2024 Five-Year Consolidated Plan.

For the 2020-2024 Consolidated Plan, the City created a new set of goals and priorities to address the needs in our community. The City identified the following goals and objectives to address in its Consolidated Plan. Included below are goals, benchmarks, and progress this year:

1. Provide essential public services. The City expected to serve 1402 persons this year and served 1499 or 107% of the annual goal.
2. Safe and affordable housing. The City expected to rehabilitate 50 rental units and rehabilitated 16 units or 32% of the annual goal. They City expected to rehabilitate 25 homeowner units and rehabilitated 3 units or 12% of the goal. The Code Enforcement Officer inspected 536 properties in the CDBG target area. Of those, 4 units received CDBG funding to correct code violations. 182 properties were cited for violations; and 66 were completed and cleared by the owner.
3. Created economic opportunities. The City was able to assist one business, representing 17% of its goal, by assisting one business which created one job at 240 Lisbon Street.
4. Public facilities and infrastructure. The 280 Bartlett Street- Soccer Field was constructed using non-CDBG funding, but will be completed with the addition of fencing to be CDBG funded. Engineering work was completed for the renovation of Howe Street sidewalks with construction to occur in the 2021 season as will construction of the Linear Park sledding hill. Not all of those efforts are included in the official count of the City meeting just 10.36 % of its annual goal by serving 3000 people.

All projects and activities funded during FFY2020 were to help address a need in one of the City's four goals. The ongoing COVID-19 pandemic presented challenges to a number of programs which prevented them from meeting their goals. Some programs exceeded their goals as they strived to provide safe and supportive services.

In immediate reponse to COVID-19, the City was able to expend \$247,830 in CDBG-CV funding to assist 154 renters and/or homeowners through

an emergency rental/mortgage assistance program. Additional CDBG-CV funding is expected to be administered through programs to assist public agencies expand their services in response to COVID-19.

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 / Amount	Indicator	Unit of Measure	Expected – Strategic Plan	Actual – Strategic Plan	Percent Complete	Expected – Program Year	Actual – Program Year	Percent Complete
Create Economic Opportunities	Non-Housing Community Development	CDBG: \$ / Revolving Loan Fund: \$	Facade treatment/business building rehabilitation	Business	5	0	0.00%			
Create Economic Opportunities	Non-Housing Community Development	CDBG: \$ / Revolving Loan Fund: \$	Brownfield acres remediated	Acre	5	0	0.00%			
Create Economic Opportunities	Non-Housing Community Development	CDBG: \$ / Revolving Loan Fund: \$	Jobs created/retained	Jobs	60	0	0.00%	12	0	0.00%
Create Economic Opportunities	Non-Housing Community Development	CDBG: \$ / Revolving Loan Fund: \$	Businesses assisted	Businesses Assisted	30	1	3.33%	6	1	16.67%

Provide Essential Services	Homeless Non-Homeless Special Needs Non-Housing Community Development	CDBG: \$	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	7010	1499	21.38%	1402	1499	106.92%
Provide Essential Services	Homeless Non-Homeless Special Needs Non-Housing Community Development	CDBG: \$	Homeless Person Overnight Shelter	Persons Assisted	0	0		0	0	
Provide Essential Services	Homeless Non-Homeless Special Needs Non-Housing Community Development	CDBG: \$	Overnight/Emergency Shelter/Transitional Housing Beds added	Beds	0	0		0	0	
Public Facilities and Infrastructure	Non-Housing Community Development	CDBG: \$ / Revolving Loan Fund: \$	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	Persons Assisted	58000	3000	5.17%	28950	3000	10.36%
Public Facilities and Infrastructure	Non-Housing Community Development	CDBG: \$ / Revolving Loan Fund: \$	Brownfield acres remediated	Acre	4	0	0.00%	4	0	0.00%

Safe and Affordable Housing	Affordable Housing Public Housing Homeless Non-Homeless Special Needs Non-Housing Community Development	CDBG: \$ / Revolving Loan Fund: \$	Rental units rehabilitated	Household Housing Unit	250	4	1.60%	50	4	8.00%
Safe and Affordable Housing	Affordable Housing Public Housing Homeless Non-Homeless Special Needs Non-Housing Community Development	CDBG: \$ / Revolving Loan Fund: \$	Homeowner Housing Rehabilitated	Household Housing Unit	25	2	8.00%	25	2	8.00%

Safe and Affordable Housing	Affordable Housing Public Housing Homeless Non-Homeless Special Needs Non-Housing Community Development	CDBG: \$ / Revolving Loan Fund: \$	Direct Financial Assistance to Homebuyers	Households Assisted	5	0	0.00%	1	0	0.00%
Safe and Affordable Housing	Affordable Housing Public Housing Homeless Non-Homeless Special Needs Non-Housing Community Development	CDBG: \$ / Revolving Loan Fund: \$	Buildings Demolished	Buildings	2	0	0.00%		2	100%

Safe and Affordable Housing	Affordable Housing Public Housing Homeless Non-Homeless Special Needs Non-Housing Community Development	CDBG: \$ / Revolving Loan Fund: \$	Housing Code Enforcement/Foreclosed Property Care	Household Housing Unit	250	4	1.60%	50	4	8.00%
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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.

In this first year of the new five-year Con Plan, our public services programs exceeded the annual goal by reaching 106.92%. The City received a \$5.2 million Lead Hazard Control Grant in 2019 which provides a source of funding to continue to address this critical issue of making housing lead safe, code compliant and healthier. A new program manager was hired to administer the 2019 Lead Grant as the 2017 Lead Grant manager closed out that grant and transitioned into a new role as the City’s Rehabilitation Coordinator. Under the new grant, on a per unit basis, \$1,400 of owner match will be required and \$1,150 of CDBG funds will be granted toward lead hazard control work of up to \$18,000. When needed to fully address code enforcement identified deficiencies beyond the scope of the lead work CDBG funds will be loaned to assist owners make their buildings code compliant. This work will be coordinated between the Lead Program Manager, Code Enforcement Officer and Rehabilitation Coordinator, of which the latter two positions are funded with CDBG.

FFY2020 continued to be a transition year for the City with new staff coming on board, staff shifting roles to include the Community Development Program Coordinator and Rehabilitation Coordinator positions, and COVID delaying and complicating most activities.

On Public Facilities, the City was way off pace in this program year and only met 10.36% of its annual goal. The engineering of the Howe Street

sidewalk improvements was completed, however, the activity on its own does not produce beneficiaries. Construction of the sidewalks will occur in the 2021 construction season as will construction of the Linear Park sledding hill and the long delayed soccer field at 280 Bartlett Street in the Choice Neighborhood area.

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	1,667
Black or African American	599
Asian	12
American Indian or American Native	5
Native Hawaiian or Other Pacific Islander	1
Total	2,284
Hispanic	27
Not Hispanic	2,257

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

Narrative

During FFY2020, approximately 72.99% of the residents of the City of Lewiston served were white and approximately 27.01% of the residents served were of non-white races (predominantly Black/African American). According to U.S. Census population estimates, the City of Lewiston is 86.79% white, 5.89% Black/African American, 1.11% Asian, 0.19% Native American, 5.80% two or more races, and 0.21% are of other race. There have not been highly disproportionate services provided to white residents over residents belonging to racial minorities although the demographics of residents served should be closely monitored in future years to ensure that a disproportionality does not develop.

CR-15 - Resources and Investments 91.520(a)

Identify the resources made available

Source of Funds	Source	Resources Made Available	Amount Expended During Program Year
CDBG	public - federal	1,225,291	966,066
Other	public - federal	720,552	52,871

Table 3 - Resources Made Available

Narrative

Identify the geographic distribution and location of investments

Target Area	Planned Percentage of Allocation	Actual Percentage of Allocation	Narrative Description
Census Tract 202	20	0	
Choice Neighborhood (Census Tracts 201, 203, 204)	75	94	Public Services Activities & Rental Rehabilitation
Lewiston, City	5	6	Homeowner Rehabilitation

Table 4 – Identify the geographic distribution and location of investments

Narrative

Most of the funding was spent in the Choice Neighborhood, which includes three of the four CDBG target areas, with only 6% spent outside of the target areas on qualified owner occupied rehabilitation projects.

Leveraging

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

The City counts all funding sources as match or leverage to the CDBG and records the amount in IDIS. The City receives match funds based on the requirements for each program.

Commercial Loans/Grants: The City requires a 1:1 private match on all commercial development programs, with the exception of the microenterprise which requires a 1:3 match. The match is collected from the owner at the time that each invoice is paid, with the owner paying half of the invoice and the City paying the other half through its loan program. Often, the total investment in a commercial project far exceeds the match required.

Residential Loans/Grants: Investor-owned 1-4 unit properties and homeowners with incomes between greater than 80% of Median Family Income (MFI) are required to provide a 10% match. For loans to homeowners at 65% MFI-80% MFI, no match is required and homeowners are given a 1/2 deferred loan at 0% interest and a 1/2 amortized loan at 1% interest. For loans to homeowners below 65% MFI, no match is required and homeowners are given a deferred loan at 0% interest. On these loans, the City attempts to maximize its CDBG resources to leverage funding sources from local partners to make improvements through weatherization, lead, and green and healthy homes.

Public Services/Infrastructure Improvements: Public Service Agencies are required to leverage CDBG funds by providing funding from other federal, local, state, or private sources.

Lead Program: The City has a \$5.2 million lead grant that will be used to make 280 housing units lead safe. For multi-families of 1 -8 rental units each unit with an income eligible HH is eligible for up to \$18,000 for lead hazard control work. The owner is required to provide a \$1,400 per unit match and the CDBG program will provide \$1,150. For buildings with more than 9 units the owner match requirement is \$1,550 per unit with no CDBG match. Properties are also eligible for CDBG rehabilitation loan funding. Income qualified single family homeowners do not need to provide an owner match. The CDBG program will provide a \$3000 grant and up to \$18,000 will come from the lead grant.

Public and Private Properties # used to further the Plan: As part of the Choice Planning and Action Grant planning effort, working toward applying for a Choice Implementation Grant, the City donated 111 and 114 Bartlett Street, 91 Pine Street and 320 Bates Street to LAAHDC, a development subsidiary of the Lewiston Housing Authority (LHA), as part of the land assemblage needed for development of 74 units of mixed income housing as part of the plan. In February 2020 the City entered into an Option Agreement with the LHA to convey the former Martel School for development of a LIHTC senior housing project. In June 2020 the City entered into an Option Agreement with Raise Op Housing Cooperative to convey 186 Blake at below the City's cost of acquisition in order to support development of a 9 unit

cooperative housing project. LAAHDC has acquired numerous other properties in the Choice Neighborhood area. Many of the properties were derelict and vacant. The city used CDBG funds and other resources to assist with demolition. The sites will be used to build high quality affordable replacement housing.

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		
Number of non-homeless households to be provided affordable housing units		
Number of special-needs households to be provided affordable housing units		
Total		

Table 5 – Number of Households

	One-Year Goal	Actual
Number of households supported through rental assistance		
Number of households supported through the production of new units		
Number of households supported through the rehab of existing units	75	9
Number of households supported through the acquisition of existing units		
Total	75	9

Table 6 – Number of Households Supported

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

The City only met 14% of its annual rental rehabilitation goal by rehabilitating 7 rental units and 2 homeowner units to address code violations. A rehabilitation coordinator position was created but not filled until nearly the last quarter this year. In response to COVID-19, the City was closed to the public and unable to conduct code inspections for most of the program year.

Discuss how these outcomes will impact future annual action plans.

With the rehabilitation coordinator getting up to speed and the effects of COVID-19 beginning to lessen the City anticipates that it will meet or exceed goals to assist eligible households to find and maintain safe, affordable housing in future annual action plans.

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

Number of Households Served	CDBG Actual	HOME Actual
Extremely Low-income	0	0
Low-income	5	0
Moderate-income	4	0
Total	9	0

Table 7 – Number of Households Served

Narrative Information

The City continues to collaborate with agency and public housing partners to identify and explore accessibility and affordability housing projects. The Economic & Community Development Department continues to be actively engaged in issues and discussions related to increasing and improving affordable housing in the City.

Additionally, the City annually provides CDBG funds to nonprofit agencies that deliver services to extremely low-, low-, and moderate – income persons in the target area.

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

There are over 7,800 people living in poverty in Lewiston. Many are on the brink of crisis. A survey of low income Maine people in 2015 found that at one point in the prior year 46% couldn't pay their utility bill; 39% couldn't pay the full monthly rent; 36% experienced having a car break down with no money to fix it; and 25% were forced to move because they couldn't afford their housing. Given this reality, preventing homelessness requires more than additional shelter beds. It requires help for people to identify needs, alleviate barriers, and connect with jobs, as is described in the recommendations with regard to poverty above. Most importantly, it requires helping homeless individuals and families to find new permanent housing. Without a stable address, it is impossible for people to get to work regularly, to stay healthy, or to plan for the future. The City of Lewiston is an active member of a collaboration of 20+ homeless service providers known as the Lewiston Auburn Alliance for Services to the Homeless (LAASH). LAASH meets monthly to communicate needs and services being provided and coordinate services to the greatest extent possible to address the needs of homeless and near homeless persons in Lewiston-Auburn. LAASH sets annual priorities and goals to address identified gaps in service delivery. LAASH facilitates the Point in Time Survey for the Lewiston-Auburn area. The link to Maine's Continuum of Care (CoC) is:

<https://www.mainehousing.org/partners/partner-type/homeless-service-providers/homeless-initiatives>

Addressing the emergency shelter and transitional housing needs of homeless persons

On June 5, 2019, LAASH and the State of Maine CoC hosted a Conversation about Homelessness at Lewiston City hall to address the recent increase in homeless individuals in Lewiston. 37 persons attended, including staff from our congressional delegation, providers, homeless persons, citizens, housing authority representatives, and City representatives to discuss issues, resources, barriers and recommendations. There were three recommendations: 1) People need to be safe and secure in housing that is affordable to them; 2) Once housed, provide supportive or case management services to help the person housed stay in their home; and 3) Establish a communication hub where good up to date information can be given to homeless people. Information could be distributed through Trinity Jubilee Center, The Club House, or the Lewiston Public Library. Last year, the historic renovation of Sophia's House, a former convent, into a combined transitional shelter and affordable housing option was completed and put into service. Sophia's House provides 2 year shared living arrangements for 6 women who have recently left and are healing from prison, trafficking or exploitation, prostitution, drug addiction, in a supportive atmosphere. The six woman live in SRO's on the 3rd floor. They share the house, meals and common spaces with 5 women on the second floor who are in permanent apartments,

living on fixed incomes, who serve as mentors. Sophia's House provides supportive services, and purposeful work in a cottage industry based at out of the house. CDBG funds were used to assist with redevelopment of the building and with programs. Tedford Housing provides 2 year permanent and affordable housing and supportive housing services to 10 homeless families through a referral process. A case manager is on site to assist with a wide variety of services which facilitate access to health services, housing navigation services, and education opportunities and job training.

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

The State of Maine previously launched an initiative with their Shelter Plus Care vouchers for long-term stayers. If a person is homeless 180 out of the previous 365 days, they will go to the top of the list to receive a voucher. The State of Maine will utilize the Homeless Management Information System (HMIS) system to identify at-risk people. A large challenge for Lewiston's chronically homeless is the lack of shelters that allow individuals to remain in the shelter more than 60 days. Two new faith-based shelters have recently been added; however, they do not count the Homeless that seek shelter in these facilities in the HMIS data system. LAASH improves access to services and housing for persons who are homeless or at risk, shares information and strengthens cooperation among local agencies and homeless providers, identifies gaps in services, increases public awareness about homeless issues, and seeks funding to service the homeless and at-risk. The Lewiston Auburn 10 Year Plan to End Homelessness identified difficulty locating assistance and navigating services (including for health, mental health, employment, and housing) as a problem for homeless persons, particularly for families and domestic violence survivors. Homeless service providers describe the challenge of keeping people housed and the need for case management to help with jobs, budgets and basic needs. For persons without a mental health or disability diagnosis, supportive services can be difficult to access unless there is a crisis. This year, the City funded 4 programs through its CDBG public services, who provided support services to 692 households who are homeless or near homeless. Tedford House, described in the section above, addresses many of these issues.

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

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receive a voucher. The State of Maine will utilize the Homeless Management Information System (HMIS) system to identify at-risk people. A large challenge for Lewiston's chronically homeless is the lack of shelters that allow individuals to remain in the shelter more than 60 days. Two new faith-based shelters have recently been added; however, they do not count the Homeless that seek shelter in these facilities in the HMIS data system. LAASH improves access to services and housing for persons who are homeless or at risk, shares information and strengthens cooperation among local agencies and homeless providers, identifies gaps in services, increases public awareness about homeless issues, and seeks funding to service the homeless and at-risk. The Lewiston Auburn 10 Year Plan to End Homelessness identified difficulty locating assistance and navigating services (including for health, mental health, employment, and housing) as a problem for homeless persons, particularly for families and domestic violence survivors. Homeless service providers describe the challenge of keeping people housed and the need for case management to help with jobs, budgets and basic needs. For persons without a mental health or disability diagnosis, supportive services can be difficult to access unless there is a crisis. This year, the City funded 4 programs through its CDBG public services, who provided support services to 692 households who are homeless or near homeless. Tedford House, described in the section above, addresses many of these issues.

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

Actions taken to address the needs of public housing

The City and Lewiston Housing Authority (LHA) work collaboratively to further fair housing initiatives and have a MOU to provide financial assistance for security deposits under the HME program. Additionally, LHA is a collaborating partner on the L-A Lead Program and Choice Neighborhood. They make referrals to owners of properties that have Section 8 tenant vouchers to enroll their property in the LEAD program. LHA works independently and does not require City assistance to further its goals. LHA has its own initiatives to address the needs of public housing residents, such as collaborating with Lewiston Schools and Lewiston Adult Education to bring educational services to its residents in an effort to open doors of opportunities to which they may not have otherwise had access.

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

Lewiston Housing Authority convenes a Resident Advisory Board to provide input for its Annual Plan. LHA encourages and provides financial support for residents to organize resident council and encourages homeownership through its Family Self-Sufficiency and Voucher Homeownership programs. The City provides rehabilitation funding through CDBG and HOME programs to support homeowners in homeownership.

Actions taken to provide assistance to troubled PHAs

Lewiston Housing Authority is a top performer under the rating system.

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 Planning Board and City Council thoughtfully consider rezoning proposals and are actively taking steps to amend zoning to allow higher density development in the CDBG Target Area and NRSA when warranted. Blake Street Towers and several adjacent blocks were rezoned resulting in the density requirement being reduced from a minimum of 1,250 s.f. of lot area per dwelling unit to no minimum lot size requirements. The rezoning also resulted in 22 buildings and 33 parcels becoming conforming that were non-conforming. This will make those parcels more attractive for new investment or redevelopment.

In August 2020, the City approved Design Standards, targeted to the Tree Street Neighborhood to promote quality development that create incentives and flexibility that supports infill development, increase landscaping and street scape requirements, and streamline the development review process.

In late 2019, the City created a Rental Registry Ordinance to improve properties in the downtown. Just as the program was launching COVID 19 descended on the landscape. With revenues to landlords significantly impacted the City Council waived the penalties for not enrolling in the registry, resulting in low participation. In 2021 that effort will be reinigorated.

The City has a long history of partnering with the private sector to develop LIHTC projects, providing tax increment financing, and when warranted, HOME funds. The City Council authorized the City to be a co-applicant on a Choice Neighborhood Implementation Grant, with the Lewiston Housing Authority (LHA) being the lead applicant. This is the culmination of several years of effort to work with citizens to develop a plan, "Growing our Tree Streets," that reflect the vision and desires of residents. Avesta Housing Development was chosen as the housing development partner to work in concert with LHA. The City is a co-applicant on the grant, and lead on the Neighborhood portion of the plan. Community Concepts is lead on the People part of the plan. The plan may be viewed at <https://www.growingourtrestreets.com/>

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

With staff changes in the CD department the City's rehabilitation program began to ramp up, with Code enforcement and CD Rehab staff providing technical assistance and funding to help property owners improve their properties and become code compliant. In 2019, the City was awarded a \$5.2 million lead hazard control grant which is more fully described in the following section.

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

The lead program provides up to \$18,000 per dwelling unit to make properties lead safe. That program is matched with a CDBG funded grant of \$1,150 per unit toward the lead hazard control work, with additional CDBG funded loans for qualified applicants. Owners are required to prove a \$1,400 per unit match.

During FFY 2020, the City continued implementing its 4th LEAD grant and, as of June 30, 2021, the City has performed lead hazard control interventions in 3 units; performed lead risk assessments/lead paint inspections to identify hazards in 41 units; performed healthy homes interventions in 3 units; educated 4 households about the dangers of lead paint; and completed 15 individual training certifications regarding lead safe practices and abatement. CDBG funded lead hazard interventions in 4 units within the target area.

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

The City is focusing its efforts on an anti-poverty strategy that reduces intergenerational poverty. In FFY 2020, the City funded 6 public agencies, benefitting 807 households by providing: subsidized childcare to enable families to work; classes and training skills to improve housing stability; soft skills employment training; and classroom tutoring and academic activities for youth that boost proficiency in the academic skills such as basic math, reading, and writing. Skills attained through these services are designed to break the cycle of intergenerational poverty.

While the City does not have a specific policy for reducing the number of poverty-level households its Social Services Department provides services directly to families living in poverty. Seeing a large increase in need due to COVID-19, the ECD Department provided CDBG-CV funds to cover the salary of an additional Social Services case worker whose position provides housing information, education and referral services to the City's lowest income and most vulnerable residents.

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

During FFY 2019, the City added two additional staff member to the Economic and Community Development Department (ECDD): 1 full time Rehabilitation Coordinator and 1 full time Intake Coordinator. Other members of the Department include a full time Director; 1 full time Economic Development Manager; 1 full time Economic Development Specialist; 1 full time Grants Accountant; 1 full time Community Development Coordinator; 1 full time Lead Program Manager; 1 part time Administrative Assistant; and 1 full time Code Enforcement Officer. The staff skill sets complement each other which allows for a thoughtful and thorough response to Lewiston's economic and community development needs. The ECDD is housed within the City so staff is able to seek support from other City departments who are always willing to help. City staff is strongly encouraged to attend training to improve knowledge.

Adding a Rehabilitation Coordinator and Intake Coordinator to the Department negated the need to contract several key functions out to a third party.

The COVID-19 pandemic has significantly impacted the ramp up of the City's rehab and lead programs.

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

The City has been able to maintain strong collaborative partnerships that bring additional resources to further community goals. The City works well with Lewiston Housing Authority, Community Concepts, Inc., Coastal Enterprises, Inc., and several LIHTC developers and private landlords to address Lewiston's housing needs. The GHHI partnership includes both hospitals, the City of Auburn, Healthy Androscoggin, and private nonprofits to meet the needs of the residents in the CDBG target area. The City is involved in LAASH and works closely with homeless providers. The City has built a network of providers that work collaboratively to accomplish goals. The City has nurtured relationships with several affordable/mixed income housing developers as well as with the Maine State Housing Authority. In the scoring structure, Maine's LIHTC Qualified Allocation Plan Lewiston is one of the preferred communities for housing.

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

The 2020 -2024 Analysis of Fair Housing Impediments identified the following issues: 1) zoning codes that restrict development, 2) lack of smaller housing options for singles and seniors, 3) barriers to safe housing for renters with prior records of substance abused, sex offender, prison time, chronic homelessness or mental health concerns, 4) unhealthy/unsafe housing stock, 5) lack of Sharia compliant financing, 6) shortage of ADA accessible units, 7) shortage of units suitable for large families, 8) few owner occupancy options in multi-family neighborhoods.

The Choice Neighborhood planning initiative identified many of these issues and recommended that home ownership opportunities be created as part of the infill development strategy. All of the replacement housing recommended in the plan included the creation of ADA compliant units in elevator service buildings when multi-family. The plan calls for the Tree Streets area to be "lead free by '43", and that new housing be energy efficient and built to Passive House standards.

The availability of Sharia compliant financing remains elusive, but the City and local lending partners continue to develop a product that meets federal banking regulations but that also does not charge interest. The City as well as CEI have been able to provide interest free loans with service charges on commercial properties, but have not yet been able to do so for residential mortgage financing. However, the effort continues.

Raise Op Cooperative Housing has renovated a total of 15 units in 3 buildings that employ the cooperative model, where members of the cooperative have ownership and management control of their buildings, bringing home ownership to low and moderate income people, albeit in a non-traditional way. Raise-OP has secured land and begun the design and financing process to develop 9 units of cooperative housing by new construction. The City has partnered in that effort, selling land at below the city's cost of ownership.

Sophia's House was established in 2019 and provides no cost housing and support services to women coming out of prison, addiction, prostitution, or trafficking. The CDBG program helped fund the renovations and continues to support programming.

As noted elsewhere in this CAPER zoning in Lewiston is a work in progress and evolving. Over the last year several areas of the downtown were rezoned to allow increased density and make non-conforming uses conforming. This has already resulted in a 35 unit mixed income LIHTC project being developed at the corner of Blake and Pine by Avesta Housing. Under the Choice Plan, and with LHA and Avesta Housing as partners, more is on the way.

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 Director, Community Development Coordinator and the Grants Accountant monitor the activities funded under the Consolidated Plan and the Annual Action Plan as follows:

- Contractual Agreements are executed between the City and Subrecipients that includes the applicable HUD regulations and addresses requirements of reporting, performance measures, documentation to support the request to be funded, agreement that the City can access and monitor files and the requirement to meet all applicable federal, state, and local regulations.
- Training sessions are held with all subrecipients on the requirements of the program, frequency of reporting, outcome measures, etc.
- A desk audit is performed by the Grants Accountant at each draw and the Administrative Assistant ensures that the reporting is completed quarterly and that the reporting is complete with number of participants served and that race & ethnicity data is provided.
- The Administrative Assistant insures annual compliance with affordability, insurance, and continued residency or other requirements as required with city loan and grant recipients.
- In April all files are reviewed to ensure compliance and that the reporting reflects the goals and objectives they identified during the application process.
- Run periodic performance reports in IDIS to monitor funded activities to the AAP
- City staff make on site visits every 3 years for grantees receiving public services grants and City staff perform a desk audit when the sub-recipient submits its quarterly report and drawdown request to ensure compliance with CDBG rules and that the sub-recipient is meeting its stated goals.

For CDBG activities conducted with other City Departments, a Memorandum of Understanding is completed with information about the expected roles and responsibilities of the department written out.

City staff follow a City adopted procurement policy that identifies the cross cutting regulations, minority business outreach, etc. CDBG staff are notified when services are being procured for a project to ensure that the appropriate language is included in the bid package. The City maintains a log of names and addresses of contact persons in our Ethnic-based Community Organizations and state registered Women, Disabled -and Minority Business Enterprises to make sure that they are included in the notifications from the City.

Program policies are reviewed on a consistent basis to ensure they are compliant with current CDBG rules.

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.

Each year the City places a notice that the CAPER is available and ready for review and provides a 15 day comment period; the notice is published to the City's various social media accounts; the DRAFT CAPER is placed on the City's website; and a copy is provided to each member of the Citizen's Advisory Committee.

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.

The City's programs and funding priorities will reflect the priorities referenced in the Choice "Growing our Tree Streets" plan. The impacts of COVID have also shaped the City's programs, with grant programs added to our loan programs. The eligible uses of those programs broadened from simply brick and mortar improvements, to include technical assistance, working capital, and childcare/transportation support for entrepreneurs.

CARES Act (CDBG-CV) funds were awarded in FFY2019. The City is working to identify activities that prepare for, respond to, and prevent COVID-19.

Unexpended FFY 2020 CDBG and CDBG-CV funds will be reallocated in FFY 2021 for existing FFY 2021 activities and/or newly identified community needs.

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

Yes

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