



2020 Consolidated Annual Performance and Evaluation Report (CAPER)

DRAFT

Norwalk Redevelopment Agency
3 Belden Avenue
Norwalk, CT 06850

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CR-05 - Goals and Outcomes

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

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

The City of Norwalk is an entitlement jurisdiction, receiving an annual allocation of Community Development Block Grant (CDBG) program funds through the U.S. Department of Housing and Urban Development (HUD). These funds help the City address the housing and community development objectives outlined by HUD, which include, but are not limited to: affordable housing preservation, affirmatively furthering fair housing, public improvements, economic development and vital services for special needs and low- to moderate-income (LMI) populations.

Program Year 2020 (PY 2020), July 1, 2020 - June 30, 2021, is the first year of the City's 2020-2024 Consolidated Plan (ConPlan). PY 2020 accomplishments are summarized below:

Affordable Housing: The City assisted a total of 67 households through the Residential Housing Rehabilitation program. Activities included housing rehab activities at supportive housing sites with Open Door Shelter, rehab of senior housing units at the Norwalk Housing Authority's Ludlow Village Senior Housing and minor housing repair and energy efficiency improvements throughout the City.

Public Facilities and Infrastructure Improvements: The City made improvements to neighborhood facilities that had a low/mod citywide benefit to 86,935 persons. These improvements were for a new boiler system at the Carver Foundation facility, and park improvements at Ryan Park and Washington Park. There were 13 LMI persons who benefitted from improvements to public facilities that served persons with a disability. This activity was the Keystone House Elmcrest Terrace Group Home Bathroom Renovation. Another 65 LMI persons benefitted from improvements at the Domestic Violence Crisis Center Norwalk Safe House which saw new flooring in bathrooms, kitchens and bedrooms.

Public Services: The City supported public services that improved the quality of life of residents. Basic services benefitted 1,124 LMI persons throughout the City. These activities included homeless prevention programs, senior services, youth services, substance abuse services and food banks. Mental health services benefitted 428 LMI persons and services were provided by the Domestic Violence Crisis Center. The City funded the Open Door Shelter Smilow Life Ctr Jobs Training Program which provided 154 LMI persons with employment training.

Economic Development: The City assisted an estimated 20 business with technical assistance in the North Water Street area. This assistance was provided as part of the Walkbridge Mitigation planning and information project, which is also part of Norwalk's City Neighborhood's initiative to revitalize the area. The City also provided funding to the Maritime Aquarium for job retention and to keep the facility open to the public.

Data note for the goal accomplishment table: For public improvements and public services, some of the 5-Year SP goal outcomes are shown below to measure accomplishments by households, however these activities are reported by “persons” and should be counted as individuals. Please note then, that while some 1-Yr Actual goal outcomes are reported correctly as persons, they may not align correctly with the 5-Year SP goal outcomes. Housing goals below are measured by “households” assisted and align correctly for 1-Yr Actual goal outcomes and 5-Year SP goal outcomes.

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
Basic services	Affordable Housing Public Housing Non-Homeless Special Needs Non-Housing Community Development	CDBG	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	7600	1124	14.79%			
Basic services	Affordable Housing Public Housing Non-Homeless Special Needs Non-Housing Community Development	CDBG	Public service activities for Low/Moderate Income Housing Benefit	Households Assisted	0	0		1520	1124	73.95%
Basic services	Affordable Housing Public Housing Non-Homeless Special Needs Non-Housing Community Development	CDBG	Other	Other	166925	86935	52.08%	33385	86935	260.40%

Economic development: technical assistance	Non-Housing Community Development	CDBG	Businesses assisted	Businesses Assisted	25	20	80.00%	5	20	400.00%
Employment training	Non-Housing Community Development	CDBG	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	2700	154	5.70%			
Employment training	Non-Housing Community Development	CDBG	Public service activities for Low/Moderate Income Housing Benefit	Households Assisted	0	0		540	154	28.52%
Health & mental health services	Non-Homeless Special Needs	CDBG	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	700	428	61.14%			
Health & mental health services	Non-Homeless Special Needs	CDBG	Public service activities for Low/Moderate Income Housing Benefit	Households Assisted	0	0		140	428	305.71%
Housing services	Affordable Housing Public Housing	CDBG	Public Facility or Infrastructure Activities for Low/Moderate Income Housing Benefit	Households Assisted	0	0		20	0	0.00%
Housing services	Affordable Housing Public Housing	CDBG	Rental units rehabilitated	Household Housing Unit	0	0		20	35	175.00%
Housing services	Affordable Housing Public Housing	CDBG	Other	Other	175	35	20.00%			

Improve public infrastructure: modern & safe	Non-Housing Community Development	CDBG	Public Facility or Infrastructure Activities for Low/Moderate Income Housing Benefit	Households Assisted	27500	86935	316.13%	5500	86935	1580.63%
Public facility rehabilitation	Homeless Non-Homeless Special Needs	CDBG	Public Facility or Infrastructure Activities for Low/Moderate Income Housing Benefit	Households Assisted	200	13	6.50%	40	13	32.50%
Public facility rehabilitation	Homeless Non-Homeless Special Needs	CDBG	Homelessness Prevention	Persons Assisted	1000	65	6.50%	200	65	32.50%
Residential rehabilitation	Affordable Housing Public Housing	CDBG	Public Facility or Infrastructure Activities for Low/Moderate Income Housing Benefit	Households Assisted	60	5	8.33%	12	5	41.67%
Residential rehabilitation	Affordable Housing Public Housing	CDBG	Rental units rehabilitated	Household Housing Unit	75	24	32.00%	15	24	160.00%
Residential rehabilitation	Affordable Housing Public Housing	CDBG	Homeowner Housing Rehabilitated	Household Housing Unit	15	3	20.00%	3	3	100.00%

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.

PY 2020 was the start of the new 2020-2024 Consolidated Plan period, and the City has identified as its priority needs for the community: Increase high quality and affordable housing, Modernize public facilities and infrastructure, Increase in available social services and Expand economic opportunities. CDBG funded activities must address one of these needs as well as primarily benefit low- and moderate-income persons or special needs populations.

CDBG funds were used to assist with affordable housing rehab, public facilities and infrastructure improvements, vital public services, and economic development opportunities. Affordable housing rehab activities accounted for 12% of CDBG funds and went towards rehab of existing affordable housing through weatherization and minor home repair of both rental and homeowner housing. Improvements to public facilities and infrastructure and facilities in low/mod areas in the City accounted for 12% of CDBG funds. Approximately 14% of CDBG funds went towards the delivery of public services to alleviate poverty, prevent and end homelessness and improve the quality of life for Norwalk residents. Activities included basic services for LMI persons, mental health services, and employment training. Finally, a major focus of the City was economic development in the program year with 29% of CDBG funds. Activities include economic financial assistance at the Maritime Aquarium for job retention, employment training, and small business technical assistance.

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	931
Black or African American	773
Asian	34
American Indian or American Native	5
Native Hawaiian or Other Pacific Islander	12
Total	1,755
Hispanic	643
Not Hispanic	1,112

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

Narrative

Data Note: The Table above does not include a category for people of “other” or “multiple races” or people who “refused to answer either racial or ethnic information” therefore the reported numbers above do not necessarily match the number of people actually served through City programs. As well, the total number assisted in the above table do not include the beneficiaries of projects determined to have an “area benefit” to the community, such as the rehab of a neighborhood/community center, park and/or street improvements. This also does not include projects with assumed beneficiaries such as senior centers and handicapped facilities.

According to the most recent 2015-2019 American Community Survey 5-Yr Estimates, white persons were 72.4% of the total population followed by black persons with 14.7% and Asian persons with 5.5%. Those who identified ethnically as Hispanic were 27.7%.

Based on the table above, for the program year the City of Norwalk CDBG programs assisted by race whites with 53%, blacks with 44% and Asians with 2% of CDBG funds. Hispanic households were assisted with 37% of CDBG funds.

In comparing the beneficiary outcomes to the City demographic profile, the City has sufficiently assisted black and Hispanic households, however there is a need to identify Asian households who may be in need of assistance.

The Needs Assessment in the 2020-2024 Consolidated Plan, assesses if any racial/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, there are no minority race groups with a disproportionate need with “regular” housing problems in the City. For severe housing problems, the needs assessment shows American Indian, Alaska Native households at 0-30% AMI with a disproportionate need, however this race group has a very small sample size. For racial/ethnic group experiencing cost burden at various levels, there are no racial/ethnic groups that disproportionately face housing cost burden. However, Hispanic households are nearly disproportionately affected by cost burden at 27.2% as compared to 19.8% of households in the aggregate.

As there are very few minority race groups with disproportionate housing needs in Norwalk, the City will continue to serve all minority groups based on individual need and income eligibility.

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	1,050,316	1,222,901

Table 3 - Resources Made Available

Narrative

In PY 2020, the total resources made available to the City was \$1,050,316 which included the 2020 HUD CDBG allocation of \$886,258 and program income of \$164,058. The City amended its 2020 AAP and later included \$866,429 in prior year funds from admin, housing, public improvements and economic development and reprogrammed these towards economic development and job retention. The prior year funds are not shown in the resources table above.

The City expended \$1,222,901 during the program year and funds were used to increase quality and decent affordable housing through housing rehab, expand economic opportunities with job training, modernize public facilities and infrastructure, and increase available public services to LMI and special needs residents in Norwalk.

CARES Act Funds:

The City of Norwalk received Round 1 CDBG-CV1 funds for \$521,436 and Round 3 CDBG-CV3 funds for \$808,049 with provisions that waived the 15% public services grant cap and related provisions to citizen participation requirements. The total amount received for both rounds of CDBG-CV funds was \$1,329,485. In PY 2020, the City expended \$615,232 in CDBG-CV funds towards service activities that worked to prevent, prepare for and respond to the coronavirus COVID-19 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 City does not allocate funding based solely on geographic requirements. When projects or planned activities are intended to serve individuals or households directly, those individuals or households must meet income qualifications, as well as residency requirements, in order to receive assistance from the program. In these instances, City staff and/or one of its partner agencies shall complete an in-take and eligibility status review of the applicant individual, or household, before the project/activity is initiated.

Additionally, the City has identified infrastructure and public facility improvement activities. In which case, planned public improvement activities are intended to serve a community, neighborhood or “area”. These activities are said to have a low/mod income “area-wide” benefit. Per HUD requirements, these areas must be within an eligible Census Tract, as defined by HUD-CDBG regulations, whereby the majority of the residents are low to moderate-income.

To determine these Tracts the City utilizes HUD CDBG Low Mod Income Summary Data (LMISD) from the HUD Exchange website, which has defined the eligible tracts within the jurisdiction. The identified census block group tracts within the jurisdiction that are considered low-moderate income can be found on the HUD Exchange website at: <https://www.hudexchange.info/programs/acs-low-mod-summary-data/>

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 awarded a portion of its annual CDBG allocation as grants to local organizations through a competitive process and recommended applicants provide matching funds, \$2/\$1 match for public service programs and a \$1/\$1 match for all other programs. Organizations in receipt of these grants received support from an array of public and private sources to provide high quality and innovative programming in service of the community. The Norwalk Redevelopment Agency (Agency) worked strategically so that federal funds attract additional funding and spur private development to meet the needs of the community.

HUD awarded a \$30 million Choice Neighborhood (CN) Implementation grant to the Norwalk Housing Authority and the Agency in 2014, and those initiatives continue to benefit the City. This transformational project has leveraged approximately \$120 million dollars from private, federal and state resources, which consists of approximately \$95 million in housing resources, over \$8 million for Critical Community Investments and about \$16.4 million for the delivery of social services. Funding sources for Critical Community Investments include CDBG, private developers, the City of Norwalk's Capital Budget, the State of Connecticut Departments of Transportation and Housing and the Connecticut Housing Finance Authority. The CN Initiative planned activities as identified in the 2020 AAP included public improvements in the CN area such as the South Norwalk Train Station Engineering and Design project, and continued loan administration and rehab technical assistance. The City's prior CAPERs report on other various initiatives that were completed through the CN grant and leveraged funds.

The Norwalk Redevelopment Agency also received a \$2,000,000 DECD Brownfields grant in 2017 to assist in the remediation of Ryan Park. Ryan Park, a community park adjacent to the Washington Village CNI project, is being redesigned to be more responsive to community needs and underwent environmental remediation. This project was completed in August in the previous 2019 program year.

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	130	12
Number of Non-Homeless households to be provided affordable housing units	3	52
Number of Special-Needs households to be provided affordable housing units	55	3
Total	188	67

Table 11 – 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	188	67
Number of households supported through Acquisition of Existing Units	0	0
Total	188	67

Table 12 – Number of Households Supported

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

For affordable housing goals accomplished by household type, the City was able to assist 12 homeless households with housing rehab at three supportive housing sites with Open Door Shelter. Specific activities included replacing all windows to improve safety and energy efficiency. The City was also able to assist 52 LMI households with housing rehab activities through the Residential Rehabilitation Program and Residential Façade Improvement Program. Housing rehab activities were minor home repairs and residential façade improvements and were made at various locations across the City. Finally, the City helped fund housing rehab at the Norwalk Housing Authority's Ludlow Village. Rehab activities helped to assist 3 LMI senior households with ADA accessible kitchen improvements.

For affordable housing goals accomplished by activity type, all the households benefitted through housing rehabilitation activities. Unfortunately, the City was not able to meet its goals established in the

2020 program year, however these housing rehab activities are still open and the City anticipates to assist more LMI households in the upcoming program year.

Discuss how these outcomes will impact future annual action plans.

While the City did not reach its goals for the program year, affordable housing preservation and housing rehab remain a high priority for the City. The City will work with housing services providers such as Open Door Shelter and the Norwalk Housing Authority to identify new LMI households that may be in need of this assistance. The City will continue to fund affordable housing preservation and rehabilitation and this is not expected to change for 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
Extremely Low-income	37
Low-income	11
Moderate-income	14
Total	62

Table 13 – Number of Households Served

Narrative Information

Data Note: While the City assisted a total of 67 households, 5 were non-low/moderate income households, so the table above only reports 62 LMI households (92.5% LMI).

Of the 62 LMI households assisted, 51 were renters and 11 were owners. Of the renter-occupied households 29 were extremely low-income, 10 were low-income and 12 were moderate-income. Of the owner-occupied households 8 were extremely low-income, 1 was low-income and 2 were moderate income. All the households were assisted with housing rehab.

Worst Case Needs

Worst case needs are extremely low-income households that are at imminent risk of homelessness and are in need of affordable housing or emergency assistance. In PY 2020, the City of Norwalk through all its housing rehab programs assisted 37 extremely low-income households with various housing rehab activities. The City will continue to work towards helping those with worst case needs, because households with extremely low-incomes lack the funds to properly upkeep their homes which may promote unsafe conditions and contribute to situations that lead to homelessness.

The City also makes efforts to assist households with a disability. The City helped fund ADA accessible improvements at three housing units at the Norwalk Housing Authority’s Ludlow Village Senior Housing. Activities include improvements such as handicap accessible kitchens and doors. If a household with a

disability is identified for assistance in one of the housing programs, the City will make all necessary accommodations within reason to meet the needs of the household.

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

In Norwalk and the surrounding communities, Opening Doors Fairfield County (ODFC) operates a Food, Fuel and Shelter community. This group consists of staff from governmental agencies and nonprofits involved in providing food, fuel, and shelter services to households impacted by poverty, food insecurity, and homelessness. The primary function of this group is to collaboratively identify service gaps and discuss strategies for solutions addressing homelessness.

Additionally, ODFC hosts Project Homeless Connect, a one-day event providing homeless or near homeless individual's free access to health and human services in one location. Services including residential services, social services, and mental health and recovery services. Follow-up appointments are also provided after the event, which circumvents the normally lengthy wait to schedule appointments.

Finally, ODFC operates the Fairfield County Coordinated Access Network (CAN), providing one point of entry for anyone experiencing a housing crisis by calling 2-1-1. A housing specialist provides referrals to service providers to prevent people from entering the homeless system. In conjunction with a continuously updated list of homeless individuals, CAN uses the Vulnerability Index - Service Prioritization Decision Assistant Tool when providing referrals. More commonly referred to as the VI-SPDAT, the tool is an evidenced-based common assessment tool that informs the type of housing intervention needed to end homelessness. The tool assesses the health and service needs of homeless individuals and families, and guides placements on the Housing Registry.

A Homeless Point-in-Time Survey Count of homeless persons in Norwalk was conducted by the Connecticut Coalition to End Homelessness in January 2020. According to the 2020 PIT Count conducted by the Coalition, in Norwalk there were 140 people experiencing homelessness and 19 were children. Information collected through the PIT Count helps the City to determine assistance towards homeless groups.

Addressing the emergency shelter and transitional housing needs of homeless persons

The Open Door provides an emergency shelter with over 95 beds. In the same building, Open Door operates a kitchen and pantry, providing food for the community. Additionally, counseling, case management, educational opportunities, job training and certification, employment assistance, and supportive housing services are offered at the nearby Smilow Life Center.

ODFC also conducts a diversion strategy to prevent households from entering a shelter by providing immediate alternate housing arrangements. Diversion assistance includes security deposits, hotel stays, car repair, and transportation costs. These services can be reach through 2-1-1.

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

In addition to the services described previously, ODFC provides a number of intervention services to ensure that individuals experiencing homeless receive stable housing. This includes Rapid Rehousing, Housing First Collaborative (HFC), and Permanent Supportive Housing (PSH). Rapid Rehousing provides just enough financial assistance and services to help people experiencing homelessness find appropriate housing. HFC immediately moves homeless individuals from the streets or shelters into their own housing units, and provides time-limited case management support. PSH provides affordable housing and holistic case management services to clients who are at repeated risk of homelessness.

Family & Children’s Agency offers a range of programs for clients experiencing homelessness. The agency offers a supportive housing program to help formerly homeless adults learn the skills to maintain housing and independent living. There is no time limit for length of stay in supportive housing. Additionally, Family & Children’s agency hosts the Community Connections Center, providing one-on-one case management and services to help clients transition from homelessness to independent living. Services include gaining access to medical and behavioral health services, classes and skill building activities, and referrals and linkages to other community-based services.

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 Norwalk Housing Authority (NHA) hosts a family self-sufficient program for their clients to achieve financial stability after leaving public housing. Services include job training, job referrals, resume development, financial literacy and management, credit counselling and repair, homeownership programs, mortgage assistance, higher education, and parenting skills. Participants who see increases in income will be able to save a portion of their rent into an escrow savings account, only to be received after graduating from the program. Participants are also eligible to participate in NHA’s Section 8

Homeownership program if they meet eligibility requirements, allow HCV holders to purchase a home with Section 8 assistance. NHA can provide mortgage assistance for up to 15 years.

In addition to the services described previously, Family & Children's Agency participates in the State's Empowering People for Success Program (EPS). The program assists current and past recipients of Temporary Assistance for Needy Families (TANF) achieve self-reliance and independence. The program consists of three components: prevention services, safety net, and employment success. Prevention services provides program participants who are in jeopardy of losing TANF benefits a second chance based on Individual Performance Contracts (IPC). Safety net provides financial assistance for up to twelve months participants who have exhausted TANF time limits and cannot receive an extension. Finally, the Employment Success Program assists clients who are receiving benefits for the first time, providing intensive support to eliminate barriers to sustained employment and identify and achieve personal goals.

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

Actions taken to address the needs of public housing

The Norwalk Housing Authority (NHA) is the principal provider of assisted housing in Norwalk. NHA operates 18 public housing properties with a total of 1,034 units. All units serve low- and moderate-opportunity households, with 698 units targeting families and 336 units targeting elderly. Additionally, NHA manages 896 Section 8 Housing Choice Vouchers.

Planned for PY 2020, the NHA worked on renovating three housing units at Ludlow Village, a senior housing property, to improve handicap accessibility and energy efficiency. Furthermore, the NHA anticipates resources of over \$2 million from the HUD capital fund in 2020. In addition to authority-wide operations and administration costs, NHA used these funds to renovate three public housing properties, replacing several items including roofs, gutters, kitchen furniture and installations, windows, and doors. Additionally, the final housing phase of the CNI is expected to add 54 units of public housing.

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

The NHA has a Resident Advisory Board (RAB) to give residents a voice in making recommendations for the development of NHA's Five-Year Plan. Educating residents on the purpose of the RAB and how their feedback will be used to inform planning efforts can help encourage participation. The RAB meetings allow for members to provide comments during a 45-day period for potential revisions to the Five-Year Plan. Comments from RAB members and responses from NHA are publicized for transparency.

Family Self-Sufficiency (FSS) activities are continuing and maintain to increase the opportunities of NHA tenants to achieve independent living. Services through the FSS program include job and employment training, financial workshops, credit counseling, homeownership counseling, and health and wellness workshops. All these services work together to help to create opportunities for public housing residents to move closer to homeownership.

Actions taken to provide assistance to troubled PHAs

N/A. The Norwalk Housing Authority is not designated as troubled.

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

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

The City's Norwalk Redevelopment Agency (Agency) recently edited and amended the South Norwalk Transit Oriented District Redevelopment Plan. The purpose of the Plan is to improve the conditions of the South Norwalk area by encouraging the development of complete, compact neighborhoods that draw new residents and businesses within a socially and economically diverse district centered on the South Norwalk Metro-North Railroad Station. The neighborhoods within the district should be of moderate scale, be both mixed-use and mixed-income and have adequate amenities for circulation, public safety and open space. Equitable development combines both people-based and place-based strategies and the city's economic development tools, land use policies and regulations to create a thriving city based on a mutually supportive relationship between neighborhoods and commercial districts and to achieve the following principles:

- Create stable socially and economically diverse neighborhoods that are sustained by minimizing the neighborhood transition costs impacting existing low/moderate income (LMI) residents.
- Provide for LMI residents to establish equity in the revitalization by becoming investors in the redevelopment goals and objectives, not disaffected by them.

The Agency also recently updated the Wall Street/West Avenue redevelopment plan. The Agency retained the Regional Plan Association that developed a new plan that encourages mixes of uses in these areas, high density, and affordability. Accompanying zoning is also being amended to allow more flexibility in size, parking requirements, and uses which can encourage additional affordability within these communities.

Additionally, the Agency worked closely with the Department of Planning and Zoning in updating the Plan of Conservation and Development for Norwalk. The plan looks at Norwalk as a whole and address topics such as zoning, land use, affordability, density, and circulation. The plan and the redevelopment plans will be compatible with one another to promote the same goals and objectives.

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

The City of Norwalk will continue to implement and annually assess its Language Access Plan to assist individuals with limited English proficiency. Census reports and ACS data will help to determine these needs and if there are needs identified the City will update the Citizen Participation Plan accordingly.

The activities indemnified in this plan work directly to meet underserved needs in the community. Affordable housing programs help to create and preserve housing for LMI households. Public services

are intended to assist the most vulnerable residents living in Norwalk, which are LMI households and the special needs communities. Public improvements are intended to benefit all persons living in low/mod income areas in the City.

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

The Norwalk Redevelopment Agency continues to refer lead-based paint hazards to the Norwalk Health Department. The Norwalk Health Department conducts lead poisoning prevention and control efforts through its Housing Section. The Housing Section uses trained and certified staff to conduct epidemiological investigations and lead inspections. As part of routine housing code inspections or as a result of a complaint investigation, the Health Department also conducts lead inspections in homes where children younger than 6 years old reside and provide educational material about lead upon request. The Norwalk Housing Authority and Norwalk Redevelopment Agency actively address lead-based paint hazards when carrying out housing rehabilitation and renovation activities, such as in South Norwalk and Wall Street.

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

The City of Norwalk's poverty reducing goals, programs and policies aim to increase the incomes of City residents and reduce the number of people who are living in poverty by moving them toward self-sufficiency. Increased income makes housing more affordable by reducing housing cost burden and by increasing the number of people who can afford to purchase or rent units produced by the Choice Neighborhoods Initiative and Agency's housing rehabilitation and new construction programs. In PY 2020, the City has planned to continue its economic development and job retention activities which are planned to help businesses retain workers such as the Maritime Center Job Retention Loan.

The Norwalk Housing Authority helps residents receiving housing assistance transition to independently maintaining their homes through their family self-sufficiency and educational programs. Services through the family self-sufficiency program include job and employment training, financial workshops, credit counseling, homeownership counseling, and health and wellness workshops.

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

The City of Norwalk continues to collaborate with human and social service agencies and the Continuum of Care to identify potential resources for meeting the needs of LMI City residents and those at-risk of homelessness. The City's Norwalk Redevelopment Agency supports the efforts of service agencies to obtain any available resources that will help in furthering the objectives of the City's community and housing development goals identified in the Consolidated Plan. The City will also continue to support and encourage the development of new and/or preservation of affordable housing units with the help of the Norwalk Housing Authority, Open Door Shelter and other local nonprofits.

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

As part of the Choice Neighborhoods Initiative (CNI), a supportive services plan is being implemented to help residents attain greater self-sufficiency, maintain housing as the area undergoes changes, and bridge opportunities. Collaboration between service providers from a wide variety of sectors is necessary to successfully execute this plan. Supportive services include:

- Education services to support early childhood development through adult career advancement
- Employment services to provide individual assessments, training opportunities, and workforce readiness preparation
- Affordable health and wellness services through routine checkups, specialty service referrals, and assistance with everyday necessities (food, housewares, clothing, utilities, etc.)
- Relocation services accommodating displaced residents while their new housing is being developed

Additionally, many public service activities expanding economic opportunities and increasing access to social services through CDBG funds will efficiently leverage dollars through collaboration and referrals. These public service activities work to improve opportunities for vulnerable populations by providing necessary housing, education, and job opportunities to obtain and maintain future permanent 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)

In January 2015, the Mayor of the City of Norwalk recognized the receipt of the document, “Analysis of Impediments to Fair Housing, An Update to the 2010 Analysis of Impediments.” The document is available on the City’s website and posted on the Norwalk Redevelopment Agency’s website (www.norwalkct.org/1412/Community-Development-Block-Grant) in both English and Spanish.

The new impediments to fair housing choice identified in the update were:

Housing Marketing: Recent outreach and the 2010 AI founds that there is housing discrimination among persons in the protected classes.

Accessibility for Persons with Disabilities: A total of 14.6% of Norwalk’s population is comprised of persons with disabilities. A review of complaint data shows that discrimination against people with disabilities is one of the highest categories. A focus group with people who had disabilities revealed detailed issue.: Specifically, the following suggestions were made for housing: better exterior access, more multi-bedroom one-story units and more units with accessible design. Also, attendees requested accessible improvements for sidewalks.

Home Mortgage Lending: Home foreclosures continue in Norwalk at about a third of the volume at the height of the recession. For instance, there were 128 filings for foreclosure in the first! half of 2014.

While data does not record minority status, typically minorities are often at a high risk of foreclosure. Certainly, data available through the Home Mortgage Disclosure Act (HMDA) filings indicate issues for minorities to qualify for mortgages, with credit record problems and collateral as major barriers.

Providing Access to Communities of Opportunity: Studies by the Connecticut Fair Housing Center and Kirwin Institute have shown that a high percentage of minorities live in low opportunity neighborhoods, particularly African-Americans and Latinos.

Language: Language can be an impediment to fair housing choice in two ways. Language can be a barrier to access to actual projects and programs, such as housing rehabilitation. Also, when public input is solicited in planning stages, people who have “limited English proficiency” (LEP) encounter barriers.

Actions Taken:

During the PY the City took these actions to address the impediments identified in the AI:

To address the impediments to fair housing choice in the areas of housing marketing, home mortgage lending and providing access to communities of opportunity, the continues to **educate**, advocate, assist and advise its residents regarding fair housing and housing discrimination with the goal of eliminating it. This is done through the Fair Housing Officer and the **Norwalk Fair Housing Advisory Commission**. The Fair Housing Officer also educates and provides information on fair housing laws, provides assistance when there is housing discrimination, investigates complaints and works with tenants, property managers and landlords and real estate professionals.

A web page on the City website has been dedicated to fair housing. This webpage provides information on fair housing, helpful information on discrimination and contacts to the Fair Housing Officer and the Commission. The website link is: <https://www.norwalkct.org/1134/Fair-Housing>

With limited funds to address housing issues, the City has focused funds on housing rehab for LMI households. The City assisted a total of 67 households through the Residential Housing Rehabilitation program. See the CR-05 for more details.

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 Norwalk Redevelopment Agency (Agency) ensures compliance with federal CDBG regulations through a comprehensive monitoring process. The Agency monitors sub-recipients and completed CDBG funded projects for compliance with related Federal requirements.

An executed written agreement outlining the scope of activities, performance criteria and length of funding period is required. Contracts for construction projects include all necessary information for Davis Bacon. Additionally, information is provided regarding compliance with HUD's Section 3 requirements and competitive contractor selection.

Attendance at a "Pre-Award Conference" is required for all new sub-recipients. The Agency reviews program and record keeping requirements with the entity receiving Federal funding.

Payment requests must be submitted with supporting documentation which may include time sheets, certified payroll records, affordable housing restrictions, income documentation, corresponding bills and/or cash receipts. Payment requests must include beneficiary information collected through household information sheets.

Quarterly reports are required to be submitted for each funding allocation. Such reports include information on the number of beneficiaries served, the status of the project, challenges and successes in the quarter and expectations for the upcoming quarter. Although a site-visit may be requested at any time, sub-recipients may request one when submitting their report.

The Agency conducts on-site monitoring by request and as needed during the program year. Organizations considered high risk are prioritized. Sub-recipient's files are reviewed for compliance with all regulations governing its administrative, financial, procurement and programmatic operations and that it is achieving its performance objectives.

Any construction work has periodic and final inspections. Proper documentation of expenditures, appropriate wages and satisfactory completion of work must be submitted prior to the expenditure of CDBG funds for facility improvements.

Recipients of HUD funds in excess of \$200,000 and individual contracts or subcontracts in excess of \$100,000 are subject to Section 3. Any contract in excess of \$100,000 requires a Section 3 plan from the contractor and the Agency monitors that plan to ensure that businesses used and individuals hired are used to the greatest extent possible as delineated in that plan. The Agency furthers this effort by requiring all construction contracts using CDBG funds to have at minimum 25% of the contract award go

to Section 3 based businesses, Small Business Enterprises, Minority Based Enterprises and Woman-Owned Enterprises.

Norwalk has also adopted a Conflict of Interest Policy for the CDBG Program that is in compliance with the U.S. Code of Federal Regulations Title 24, Part 570.11.

The City also understands its obligation to Affirmatively Further Fair Housing. The Norwalk Analysis of Impediments was updated in 2015. The Norwalk Fair Housing Officer is charged with ensuring education about fair housing is conducted and with managing complaints which might be received. In their applications for CDBG funding, all sub-recipients must submit their organization's Language Access Plan which ensures organizations supported by federal funding offer meaningful access to all persons, regardless of their ability to speak English.

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

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

The Consolidated Annual Performance and Evaluation Report (CAPER) was made available for public comment for 15 days and was also the subject of a public hearing at Common Council.

The public comment period was held from August 26, 2021 to September 10, 2021 to give the public an opportunity to review and make comments on the draft CAPER. The draft CAPER was available to view on Norwalk's website at <https://www.norwalkct.org/1412/Community-Development-Block-Grant>.

Due to the COVID-19 pandemic, hard copies were available via request only. For information on how to obtain a hard copy, call Stephen Ivan at (203) 854-7810 ext. 46784 or Carly Kramer at (203) 854-7810 ext. 46791. Public comments were to be received by the Agency no later than 4:00pm on Friday, September 10, 2021 and could be emailed to Sivan@Norwalkct.org or by mail.

The City held a public hearing at the Planning Committee meeting on September 2, 2021 at 7:00 PM during the scheduled Planning Committee meeting. Participants could join the meeting via the City's virtual meetings link www.norwalkct.org/1913/Meeting-Notices. Persons unable to attend could submit written comments for the record no later than 4:00 PM on Friday, September 10, 2021.

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 there are no changes to the overall strategies of the Strategic Plan. The priority needs and goals continue to serve as the basis of the 5-Year Strategic Plan.

While the needs and goals remain the same, the City amended the first year Annual Action Plan projects to streamline project categories and to align with the current needs of the community. Further, in future plans the City may make adjustments to the goal outcome indicators as necessary to properly account for any new identified planned activities and funding priorities during the development of each AAP in the 5-Year planning period.

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

No

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

N/A