



WEST PALM BEACH

2022

Consolidated Annual Performance Evaluation Report



PY 2022 CAPER
(Oct. 1, 2022 – Sept. 30, 2023)

City of West Palm Beach
Housing and Community
Development

401 Clematis Street
West Palm Beach, FL 33401



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Executive Summary

The mission of the City of West Palm Beach Department of Housing and Community Development (HCD) is to improve the quality of life for its residents through the development of housing, social, and economic opportunities. The Department is committed to high standards of customer service in the administration and delivery of programs that are collaborative, innovative, and sustainable.

Creating opportunities that will support and empower low-income households and neighborhoods requires a multifaceted and comprehensive approach. The City of West Palm Beach has determined that in order to maximize the production or preservation of affordable housing units, create economic development opportunities, and provide services to its residents, it must commit to a variety of public/private initiatives. Additionally, the City continuously works toward integrative goals that focus on leveraging strategies both internally, across multiple City departments, and externally with non-profit, government, and private sector partners.

As an entitlement community receiving U.S. Department of Housing and Urban Development (HUD) formula program funds, the City of West Palm Beach is required to submit a Five Year Consolidated Plan that serves as the planning tool outlining the jurisdiction's housing and community development needs and strategies to address those needs. The Consolidated Plan is carried out through Annual Action Plans which provide a concise summary of the actions, activities, and specific federal and non-federal resources that will be used each year to develop strong, sustainable, and inclusive communities. The Annual Action Plan is developed under HUD guidelines and serves as the City's application for the following entitlement grants:

- Community Development Block Grant (CDBG) Program;
- HOME Investment Partnerships (HOME) Program; and
- Housing Opportunities for Persons with AIDS (HOPWA) Program.

The City engaged in strategic planning efforts to direct the use of City resources to address priorities established by residents and community leaders. As a result, the City adopted its Strategic Plan which provided the community with a clear vision of where West Palm Beach is headed and policy direction for City administrators and staff. In Program Year (PY) 2022 (October 1, 2022 – September 30, 2023), through federal, state, and local funding, the City accomplished projects that supported housing and community development initiatives outlined in the City's Strategic Plan as well as the 2020-2024 Consolidated Plan and the 2022-2023 Annual Action Plan.

At the end of each Program Year (PY), the City must prepare a Consolidated Annual Performance and Evaluation Report (CAPER). This report must be submitted to HUD within 90 days after the close of the program year and includes information on the programmatic accomplishments under the various grant programs. The CAPER also contains information relevant to the households assisted (including income, racial, and ethnic composition), actions taken to further fair housing, and how the jurisdiction's actions and performance align with the City's overall strategic plan. This year's CAPER also discusses accomplishments under supplemental funding received in PY 2020 through the Coronavirus Aid, Relief and Economic Security Act (CARES Act) to prepare for, prevent, and respond to the Coronavirus pandemic (COVID-19), as well as accomplishments for the State Housing Initiatives Partnership (SHIP) Program funded by the State of Florida.

CR-05 - Goals and Outcomes

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

The City of West Palm Beach undertook the projects and activities outlined in the Consolidated Plan and 2022-2023 Annual Action Plan to achieve the overall goal of providing decent housing, creating a suitable living environment, and expanding economic development opportunities principally for low- and moderate-income persons. During the reporting period, with the entitlement funds received annually, as well as the supplemental CARES Act funding received through the CDBG-CV and HOPWA-CV programs.

HOMELESSNESS AND PUBLIC SERVICES

During PY 2022, the City proposed to provide various public services to 120 persons utilizing CDBG funding, 290 persons with CDBG-CV funding, and 53 persons with HOPWA-CV funding. The City carried out the following activities:

- Provided utility assistance to low- and moderate-income, elderly residents through the Serving our Seniors (SOS) Program. (\$483.69 expended; 2 persons assisted)
- Provided financial support to Esperanza Community Center for the salary and benefits of a community health outreach worker responsible for providing COVID-19 related health services and education, personal protective equipment, and referrals to community resources. (\$30,720 expended; 535 persons assisted)
- Partnered with Florida Agricultural and Mechanical University (FAMU) to launch two community gardens and educational programs in neighborhoods that have limited access to grocery stores, lack healthy food choices, and where food insecurity was exacerbated by the COVID-19 pandemic. (\$82,650 expended; 328 persons assisted)
- Provided supportive services and permanent housing placement to individuals living with HIV/AIDS and impacted by COVID-19. (\$ XXXXXX expended; XX households assisted)

PUBLIC FACILITIES AND IMPROVEMENTS

During PY 2022, the City proposed to carry out public facilities or improvements projects that provided 1,000 low- and moderate-income persons with availability/access to suitable living environments. The City carried out the following activities:

- Completed construction of the Eva W. Mack Community Hub, the new location for the HCD Community Services Division, in May 2023. (\$1,028,733 expended; 490 persons assisted)
- Provided funding for the construction of an approximately 6,000 linear feet extension to a multipurpose concrete trail and addition of a boardwalk along Clear Lake. The project will connect the residential neighborhoods along Palm Beach Lakes Blvd. to Okeechobee Blvd. and downtown, allow for multimodal transportation options, and encourage social distancing to address ongoing impacts of COVID-19. Beneficiaries for this project will be reported during the PY2023 CAPER when construction is completed. (\$600,000 expended)

AFFORDABLE HOUSING

During PY 2022, the City proposed to produce or rehab three housing units for homeownership or rental, to provide tenant-based rental assistance to 230 households, and to prevent homelessness for 37 households. The City carried out the following activities:

- Provided tenant-based rental assistance and supportive services to individuals and families living with HIV/AIDS through a program administered by the Palm Beach County Housing Authority. (\$3,122,765 expended; 226 households assisted)
- Provided short-term rent/ mortgage/ utility assistance and hotel/motel leasing to individuals living with HIV/AIDS and impacted by COVID-19. (\$XX, XXX expended; XX households assisted)

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)

Goal	Source	Indicator	Expected 5Yr Strategic Plan	Actual 5Yr Strategic Plan	Expected Program Year 2022	Actual Program Year 2022	Percent Complete Program Year 2022
Affordable Housing	HOME	Homeowner Housing Added	0	7	3	0	0.00%
Affordable Housing	HOME	Direct Financial Assistance to Homebuyers	20	7	0	0	0.00%

Goal	Source	Indicator	Expected 5Yr Strategic Plan	Actual 5Yr Strategic Plan	Expected Program Year 2022	Actual Program Year 2022	Percent Complete Program Year 2022
Affordable Housing	HOPWA	Tenant-based rental assistance / Rapid Rehousing	1250	688	230	226	98.26%
Affordable Housing	HOPWA	Other/Supportive Services	1250	633	230	226	98.26%
Affordable Housing	HOPWA- CV	Public service activities other than Low/Moderate Income Housing Benefit (Permanent Housing Placement & Supportive Services)	0	0	53	XX	XX.XX%
Affordable Housing	HOPWA- CV	Homelessness Prevention (STRMU & Hotel/Motel Leasing)	0	0	37	XX	XX.XX%
Economic Development	CDBG	Jobs created/ retained	200	0	0	0	0.00%
Homelessness Assistance and Public Services	CDBG	Public service activities other than Low/Moderate Income Housing Benefit	125	351	120	2	1.67%
Homelessness Assistance and Public Services	CDBG-CV	Public service activities other than Low/Moderate Income Housing Benefit	0	0	290	863	297.59%

Goal	Source	Indicator	Expected 5Yr Strategic Plan	Actual 5Yr Strategic Plan	Expected Program Year 2022	Actual Program Year 2022	Percent Complete Program Year 2022
Homelessness Assistance and Public Services	HOME	Tenant-based rental assistance / Rapid Rehousing	35	0	0	0	0.00%
Infrastructure and Public Facilities	CDBG	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	1000	2435	1000	490	49.00%

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 City's 2020-2024 Consolidated Plan and 2022 Annual Action Plan contained the priorities for the City's use of federal, state, and local housing funds. During PY 2022, the City continued to address the highest priority needs (affordable housing, infrastructure, homelessness and public services, and economic development) within the City, principally for low- and moderate- income persons. From October 1, 2022 through September 30, 2023, the City completed multiple activities and has several activities underway to address the housing and community development needs of residents. In addition to delivery of services and programs, the City continued its goal to diligently to comply with the objectives of the formula programs.

Housing

To maintain economic and social vibrancy in the City of West Palm Beach, it is important for the City to provide an attainable supply of housing at all income levels. To achieve that goal, the City established programs to provide assistance for homeownership and rental units for low-income persons and for persons with special needs. These programs include the new construction and rehabilitation of affordable housing, downpayment assistance, and the provision of utility and rental assistance. The City's housing programs are funded with federal resources, including CDBG, HOME, and HOPWA, state funding through the State Housing Initiative Partnership (SHIP) Program, and local funding.

The City continues to leverage federal and state funding for affordable housing with its local Housing Trust Fund (HTF) that is used to provide development loans to developers, among other purposes. During PY 2022, two rental development projects funded with HTF and tax-increment financing from the West Palm Beach Community Redevelopment Agency (CRA) were completed. These are Flagler Station, a 94-unit affordable housing project, and The Grand, a 309-unit mixed-income project, including 206 workforce housing units. The local HTF supports the Mayor's "600 in 3" Initiative, announced in January 2020, which aimed to complete the development of 600 affordable housing units in less than three years. By the target date, the City had 602 units completed or underway and at the end of PY 2022, several new projects were progressing through the approval process.

In addition to the housing projects completed during PY 2022, the City also committed SHIP funding to two projects being constructed by Neighborhood Renaissance, a non-profit affordable housing developer. Neighborhood Renaissance began construction of two single-family homeownership units and held a groundbreaking for a 43-unit multifamily rental development,

located in the Coleman Park neighborhood, known as Coleman Park Renaissance. The anticipated completion date for this project is Summer 2025.

The City also undertook recent regulatory reforms to incentive the development of affordable and workforce housing. In August 2021, the City Commission approved the creation of the Downtown Master Plan (DMP) Housing Incentive Program for the purpose of promoting the construction of residential units for families earning between 60% and 100% of the area median income within the Downtown. The program offers additional development capacity through the transfer of development rights program within the downtown and surrounding areas. The City adopted changes to the DMP Housing Incentive Program for clarification purposes in January 2023 and approved the Downtown Housing Incentive Program Implementation Guide. During PY 2021, the City continued to explore policy actions to increase the supply of affordable housing. This included the creation of standards for the review of residential projects subject to Section 166.04151, Florida Statutes, providing for the development of affordable housing on parcels zoned for residential, commercial, or industrial use, codified in December 2022. With the adoption of Senate Bill 102, the Live Local Act, the City plans to initiate Comprehensive Plan amendments and code amendments to the land development regulations to comply with the state policy while continuing with permitted provisions under the adopted City's workforce housing provisions, Resolution 306-22.

Social Services

During PY 2022, the City continued its efforts to strengthen the coordination of social services between government and nonprofit agencies. This was accomplished by utilizing CDBG funds for the provision of utility assistance through the City's Serving Our Seniors (S.O.S) Program. The S.O.S. Program provides temporary assistance for the critical needs of low-income, elderly residents. In addition, the City will continue to contribute to assisting persons experiencing homelessness make the transition to permanent housing and independent living by providing funds that serve these populations and by expanding affordable housing options. The City also collaborated with the local Continuum of Care and Ryan White service providers to ensure that individuals who are homeless or in danger of being homeless are able to access HOPWA housing assistance.

In PY 2020, the City was the recipient of funding under the Coronavirus Aid, Relief and Economic Security Act (CARES Act). The purpose of CARES Act funds was to prevent, prepare, and respond to COVID-19 and to facilitate assistance to eligible communities and households economically impacted by the pandemic. During the 2020 program year, HCD partnered with the City's Fire Department to provide COVID-19 vaccines and other health support to low-income residents. The focus of the COVID-19 Vaccine Program was to administer mobile vaccinations, paramedic

support, and education and outreach to eligible residents residing in census tracts where 51% or more of the residents are low- and moderate-income. The City also used the CDBG-CV grant to support the COVID-19 Summer Feeding Program. During the 2021 program year, the City awarded funds to two subrecipients for the provision of health services: FAU Community Health Center and Esperanza Community Center. In PY 2022, the City continued its support of the Esperanza Community Center's Health Outreach Program and initiated a new project in partnership with the Florida Agricultural and Mechanical University (FAMU). The collaboration with FAMU has resulted in the establishment of community gardens in two of the City's areas of greatest need, the Coleman Park and Pleasant City neighborhoods, and plans for a third garden in the Phipps Park community, in the southend of the City are underway. Along with the gardens, FAMU staff provides a range of programming for neighborhood residents including nutrition programs, gardening workshops, and tree giveaways.

The City also received a supplemental award of HOPWA funding under the CARES Act referred to as HOPWA-CV. The HOPWA-CV funding was subawarded to Palm Beach County (Community Services Department) for various eligible activities including the provision of supportive services, permanent housing placement, leasing hotels/motels to quarantine HOPWA eligible persons or their household members, and the payment of short-term rent, mortgage, and utility payments for up to 24 months.

Public Infrastructure and Facilities

The City completed construction of one public facility during PY 2022. The new public facility, the Eva W. Mack Community Hub, is a 5,422 square foot building located at 1540 N. Australian Avenue in West Palm Beach. This public facility serves low- and moderate-income individuals, families, elderly, disabled, and persons experiencing homelessness or at-risk of homelessness. The Community Services Division, a section of the HCD Department, relocated from the Vickers House and began operating at the new location in May 2023. The City will continue to provide funding, direct services, and programs for the homeless including the following: permanent housing; supportive housing; rapid rehousing; food assistance; relocation assistance; assessments; referral services; and job placement assistance from the Eva W. Mack Community Hub. The total project budget for the facility was approximately \$3.78M. The CDBG program comprised 95 percent of the project funding with the balance coming from local sources.

During PY 2022, the City utilized CDBG-CV funding to undertake the extension of an existing multi-use path along the western shoreline of Clear Lake. The multipurpose trail is approximately 5,720 linear feet and includes a 687-foot-long boardwalk and landing on the southern end where it crosses over Clear Lake and intersects with Okeechobee Boulevard. The main beneficiaries of the project are low- and moderate-income residents in the area adjacent to the project which are

considered transportation disadvantaged. The project will assist in the recovery from the coronavirus pandemic by providing safe efficient, and socially distanced pedestrian and bicycle access to the multiple employment, transportation, educational, medical, and social service facilities in downtown West Palm Beach. The total project cost is approximately \$2.4M. The project is comprised of CDBG-CV of \$600,000, representing 25% of the project budget, a State of Florida Department of Transportation Local Agency Program (LAP) grant, and local matching capital improvement funds.

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	HOME	HOPWA
White	0	0	33
Black or African American	2	0	193
Asian	0	0	0
American Indian or American Native	0	0	0
Native Hawaiian or Other Pacific Islander	0	0	0
Total	2	0	226
Hispanic	0	0	21
Not Hispanic	0	0	205

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

Narrative

The City of West Palm Beach prioritizes needs and offers services and programs to eligible households regardless of race or ethnicity. Entitlement funds were distributed amongst low- and moderate-income persons and households and in areas located in qualified census tracts.

This CAPER, as required by HUD, utilizes data from Integrated Disbursement and Information System (IDIS) to assess how housing and community development program funds were used to serve the beneficiaries of HUD funded programs.

The table above depicts the data from activities completed during PY 2022 that provided a direct benefit to eligible households. These activities include CDBG public service activities (Serving Our Seniors Program) and the HOPWA Tenant Based Rental Assistance program operated by the Palm Beach County Housing Authority (PBCHA).

Not reflected in the table above is data for individuals and families assisted through funding received under the Coronavirus Aid, Relief and Economic Security Act (CARES Act). During PY 2020, the City was the recipient of funding under the CARES Act to prevent the spread of COVID-19 and to facilitate assistance to eligible communities and households economically impacted by the pandemic. For the 2020 program year, HCD in partnership with the City's Fire Department utilized the supplemental CDBG funding (CDBG-CV) to provide COVID-19 vaccines and other health support to low-income residents. The City also used the CDBG-CV grant to support the COVID-19 Summer Feeding Program providing nutritious meals for lunch and snacks for children

participating in the CityFun Summer Camp. Combined, these two programs served a total of 3,930 persons. During PY 2021, CDBG-CV funds were awarded to two subrecipients to provide health services to prevent the spread of COVID-19 through education, vaccination, distribution of PPE, and other outreach efforts. The FAU Christine E. Lynn College of Nursing Community Health Center at U.B. Kinsey Educational & Community Center assisted 1,399 persons during the reporting period. Esperanza Community Center served 310 unduplicated persons between March through August 2022.

In PY 2022, the City continued its support of the Esperanza Community Center's Health Outreach Program which assisted 535 unduplicated persons. The City also initiated a new project in partnership with the Florida Agricultural and Mechanical University (FAMU). The collaboration with FAMU has resulted in the establishment of community gardens in two of the City's areas of greatest need, the Coleman Park and Pleasant City neighborhoods. Along with the gardens, FAMU staff provides a range of programming for neighborhood residents including nutrition programs, gardening workshops, and tree giveaways. FAMU has served 328 persons during PY 2022.

Through the HOPWA-CV grant, Palm Beach County Board of County Commissioners (PBC-BCC), Community Services Division provided supportive housing, administration, and support services, including, but not limited to, case management, health, and mental health assessments, permanent housing placement, and short-term rental and utility assistance. **A total of 45 households were assisted during PY 2021.**

The table below reports on the beneficiaries served with CDBG-CV and HOPWA-CV funding during PY 2021.

	CDBG-CV	HOPWA-CV
White	524	12
Black or African American	283	33
Asian	2	0
American Indian or American Native	0	0
Native Hawaiian or Other Pacific Islander	0	0
Multi-Racial	54	0
Total	863	45
Hispanic	511	7
Not Hispanic	352	38

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	988,328	1,189,842
HOME	public - federal	550,987	50,896
HOPWA	public - federal	3,244,080	3,182,319

Table 3 - Resources Made Available

Narrative

In PY 2022, the City of West Palm Beach received annual entitlement funds from the CDBG, HOME, and HOPWA federal grant programs. The table above details the resources made available and amounts expended during the program year. Funds expended during the program year include administrative amounts, reprogrammed prior year funds, funds awarded to activities in prior program years that were not spent, and funds received through program income. As such, program expenditures may differ from award amounts.

In response to the COVID-19 pandemic, the City also received Coronavirus Aid, Relief, and Economic Security Act (CARES Act) funding and a summary of the uses are described below.

CARES Act Funds

CDBG-CV: In PY 2020, the CARES Act funding allocation for CDBG-CV was awarded in two rounds for CDBG-CV and CDBG-CV(3), which were \$597,108 and \$987,542, respectively, totaling \$1,584,650. In response to the COVID-19 pandemic, through PY 2022, the City expended a total of \$1,397,397.67 on public services, public improvements, and administrative costs. The remaining balance of CDBG-CV funding totals \$187,252.33.

HOPWA-CV: In PY 2020, the CARES Act funding allocation for HOPWA-CV was \$467,782. The City has expended a total of \$445,145.36 through PY 2022 leaving a remaining balance of \$25,636.64 available. The supplemental funds provided under the CARES Act are being used for rental assistance, hotel/motel leasing, permanent housing placement, supportive services, administrative costs, and other necessary actions to assist individuals living with HIV/AIDS and their families.

American Rescue Plan Act Funds

In PY 2021, \$1,734,257 funding was made available through the American Rescue Plan Act (ARPA) for the HOME-ARP Program. The City is currently in the planning phase for this funding and has

expended a total of \$2,576.75 on administrative expenditures. The expenditure deadline for the HOME-ARP is September 30, 2030.

Identify the geographic distribution and location of investments

Target Area	Planned Percentage of Allocation	Actual Percentage of Allocation	Narrative Description

Table 4 – Identify the geographic distribution and location of investments

Narrative

The City did not identify any target areas in its Consolidated Plan. The needs identified within the City are located throughout the community, and no specific geographic areas are identified as a priority for the purpose of allocating funds for housing, public facilities, or public services. There are low-income areas in West Palm Beach consisting of more than 51% low- to moderate- income residents. While there is no specific geographic priority, these areas are all served through citywide housing and community development programs.

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 of West Palm Beach realizes that HUD funds alone are not enough to address the increasing demand for creating affordable housing and expanding community development assets. The City leveraged its HUD funding to the maximum extent possible using a combination of state, local, and private sector resources.

The City received State Housing Initiative Program (SHIP) funds in PY 2022 in the amount of \$1,142,938. SHIP funding may be used for single family and multi-family acquisition, rehabilitation, new construction, down payment/mortgage assistance programs, security and utility deposits for the purpose of homelessness prevention, and foreclosure prevention. The City expended \$308,438 in SHIP funds on HOME-eligible projects.

Additional leverage using CDBG public assistance set-aside through the City's Community Services programs, which provides community services to youth and special needs populations that is primarily funded through local funds. The City also leverages housing, community development, economic development and social service projects and programs with the City's Community Redevelopment Agency (CRA), for-profit and non-profit developers, other local government agencies, and social service providers.

In addition to leveraging financial resources, HCD maintains a list of city-owned properties that are appropriate for use as affordable housing. No properties were donated or sold during the program year. The City continues to leverage its local Housing Trust Fund for the development of affordable and workforce housing units.

In PY22, the 25% HOME Match was not reduced by HUD for distress. In PY22, there were \$0 in HOME program expenditures that required matching, and therefore \$0 in match requirement. This match requirement is however, superseded by the HUD waiver and suspension of the HOME program match requirements in response to the COVID-19 pandemic. As described in the "Additional Revision, and Extension of December 2020 and April 2020 Memorandum- Availability of Waivers and Suspensions of the HOME Program Requirements in Response to COVID -19 Pandemic" memorandum, effective September 30, 2021, the waiver to reduce the HOME match requirement by 100 percent for fiscal years 2020 and 2021 is extended to 2022.

Fiscal Year Summary – HOME Match	
1. Excess match from prior Federal fiscal year	\$1,450,212
2. Match contributed during current Federal fiscal year	\$69,119
3. Total match available for current Federal fiscal year (Line 1 plus Line 2)	\$1,519,331
4. Match liability for current Federal fiscal year	\$0
5. Excess match carried over to next Federal fiscal year (Line 3 minus Line 4)	\$1,519,331

Table 5 – Fiscal Year Summary - HOME Match Report

Match Contribution for the Federal Fiscal Year								
Project No. or Other ID	Date of Contribution	Cash (non-Federal sources)	Foregone Taxes, Fees, Charges	Appraised Land/Real Property	Required Infrastructure	Site Preparation, Construction Materials, Donated labor	Bond Financing	Total Match
NON-2022-01								

Table 6 – Match Contribution for the Federal Fiscal Year

HOME MBE/WBE report

Program Income – Enter the program amounts for the reporting period				
Balance on hand at beginning of reporting period \$	Amount received during reporting period \$	Total amount expended during reporting period \$	Amount expended for TBRA \$	Balance on hand at end of reporting period \$
173,088	2,853	0	0	175,941

Table 7 – Program Income

Minority Business Enterprises and Women Business Enterprises – Indicate the number and dollar value of contracts for HOME projects completed during the reporting period						
	Total	Minority Business Enterprises				White Non-Hispanic
		Alaskan Native or American Indian	Asian or Pacific Islander	Black Non-Hispanic	Hispanic	
Contracts						
Number	0					
Dollar Amount	0					
Sub-Contracts						
Number	0					
Dollar Amount	0					
	Total	Women Business Enterprises	Male			
Contracts						
Number	0					
Dollar Amount	0					
Sub-Contracts						
Number	0					
Dollar Amount	0					

Table 8 - Minority Business and Women Business Enterprises

Minority Owners of Rental Property – Indicate the number of HOME assisted rental property owners and the total amount of HOME funds in these rental properties assisted						
	Total	Minority Property Owners				White Non-Hispanic
		Alaskan Native or American Indian	Asian or Pacific Islander	Black Non-Hispanic	Hispanic	
Number	0					
Dollar Amount	0					

Table 9 – Minority Owners of Rental Property

Relocation and Real Property Acquisition – Indicate the number of persons displaced, the cost of relocation payments, the number of parcels acquired, and the cost of acquisition						
Parcels Acquired						
Businesses Displaced						
Nonprofit Organizations Displaced						
Households Temporarily Relocated, not Displaced						
Households Displaced	Total	Minority Property Enterprises				White Non-Hispanic
		Alaskan Native or American Indian	Asian or Pacific Islander	Black Non-Hispanic	Hispanic	
Number	0					
Cost	0					

Table 10 – Relocation and Real Property Acquisition

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	3	0
Number of Special-Needs households to be provided affordable housing units	230	226
Total	233	226

Table 11 – Number of Households

	One-Year Goal	Actual
Number of households supported through Rental Assistance	230	226
Number of households supported through The Production of New Units	3	0
Number of households supported through Rehab of Existing Units	0	0
Number of households supported through Acquisition of Existing Units	5	0
Total	233	226

Table 12 – Number of Households Supported

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

For PY 2022, the City planned to provide affordable housing to 233 households utilizing HOME and HOPWA funding. The City successfully assisted 226 households with rental assistance through the Tenant Based Rental Assistance program which is funded with HOPWA dollars. The City's project sponsor, Palm Beach County Housing Authority, identified the shortage of affordable rental units and a fair market rent standard that is significantly lower than market rate rent as a continued challenge for low-income renters. These challenges put individuals living with HIV/AIDS and other households with special needs at a greater risk of homelessness. Additional details on the HOPWA program are included in the stand-alone HOPWA CAPER.

The City planned to construct or rehabilitate three (3) homeownership units using HOME funding. These housing production and acquisition goals were not realized with HOME funds partially due to the surge in sales prices for homeownership units, limited down payment assistance resources, and investor competition. The City focused its housing efforts on increasing the supply of rental housing units due to the high rental rates that residents are facing and leveraged other resources to create opportunities for homeownership, further described below.

Discuss how these outcomes will impact future annual action plans.

Although the City made sufficient progress towards its PY 2022 affordable housing goals, adjustments and improvements will be made to housing strategies, as needed. The City will continue to set priorities to meet the goals in the Consolidated Plan, shifting focus as needed to prioritize activities based on available funding and market conditions. The City may also explore additional leveraging opportunities to ensure adequate resources are available to address the extent of the City's diverse housing needs.

Housing costs, for both rental and homeownership, have increased substantially and this is anticipated to have an impact on how available funding will be for homeownership activities in the future. Low-income homebuyers are unable to compete with investors in the open market and the gap between the purchase price of existing units and the maximum down payment assistance a household can qualify for continues to widen.

As a steward of federal resources, the City must make the best use of the limited resources available to achieve the maximum benefit for eligible individuals and families. Increasing the purchase assistance limit to make existing units affordable to a lower income household will significantly reduce the number of households that can be assisted. The City believes the best approach for increasing the number of low- and moderate-income homeowners is through partnerships with developers for the new construction of housing units. Increasing construction costs also play a major factor in housing production and rehabilitation of existing units. The City will continue to provide incentives and other resources, such as surplus land, to lower the cost of producing new affordable units.

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	0	0
Moderate-income	0	0

Total	0	0
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Table 13 – Number of Households Served

Narrative Information

During PY 2021, the City committed \$314,596 in State Housing Initiatives Partnership (SHIP) funding to Community Partners, a non-profit developer of affordable housing, for the construction/rehabilitation of three (3) single-family homes to be sold to households at or below 80% AMI. One of the homes is designated for a household at or below 50% AMI. As of December 2023, renovation of the three homes has been completed.

The City also committed SHIP funding to Neighborhood Renaissance for two projects: (1) Coleman Park Renaissance, a 43-unit multifamily rental development to be completed by Spring 2026 and (2) the new construction of two single-family homes for a very-low income and a low-income household. Construction of these two units is anticipated to be completed during December 2023.

During the 2022 program year, the City also completed construction of multiple affordable or workforce housing development projects including Flagler Station (94 assisted units) and The Grand (206 assisted units). Several other rental projects are under construction or pending approval including 575 Rosemary, a 362-unit development that includes 54 workforce housing units.

Provide a summary of the efforts to address “worst case needs”, and progress in meeting the needs of persons with disabilities.

Worst case needs are defined as low-income renters with severe cost burden, in substandard housing, or involuntarily displaced. During PY 2022, the City continued implementation of the Serving Our Seniors (SOS) Program and the Housing Stabilization Program. The SOS Program provides temporary assistance for critical needs to low-income elderly residents in the form of a one-time emergency grant that can be used for utility assistance, transportation, handicapped accessibility, and medical prescription assistance. For PY 2022, two households were assisted through the SOS Program. The Housing Stabilization Program (HSP) provides one-time financial assistance to families and individuals to gain or maintain housing stability. The program targets families and individuals who are housed but are at imminent risk of becoming homeless and homeless families or individuals seeking housing to remain within the City. During PY 2022, 23 households were received security deposit and/or utility deposits through the HSP.

In addition to these City-operated programs offered at the Eva W. Mack Community Hub, there are several local, private resources to assist persons with worst case needs including:

- Palm Beach County Community Services – offers emergency services such as food and clothing, rent/mortgage/utility assistance, and family self-sufficiency services that include job training, childcare, education, and financial counseling;
- Gulfstream Goodwill Industries - changes lives through employment, training, and housing to create vibrant communities, free of poverty, homelessness, and unemployment;
- Habitat for Humanity of Palm Beach County – partners with families to build and rehabilitate affordable homes so that residents can achieve the stability and independence to build a better life for themselves and their families;
- Housing Leadership Council of Palm Beach County – works on collaborative efforts to address issues that are destabilizing neighborhoods to ensure that there is an adequate supply of workforce housing;
- Community Partners – changes the odds for children and families facing adversity and creates lasting social change by providing comprehensive services and solutions that target behavioral/mental health, housing, and community;
- Neighborhood Renaissance – provides financial literacy and homebuyer counseling; COVID-19 rental assistance and relief program and builds homes that are within the financial reach of low- and moderate-income families and individuals.
- Northend RISE – addresses pressing housing, education, employment, and health concerns by providing mixed-income housing (housing renovation or repair for first time homebuyers), cradle-to-career education, and health and wellness checks, in the Northend neighborhoods of West Palm Beach, Coleman Park, and Pleasant City.

In regard to meeting the needs of persons with disabilities, the City utilizes its HOPWA funding to provide housing and supportive services/case management to individuals living with HIV/AIDS. As mentioned above, 226 households benefitted from the Palm Beach County Housing Authority's Tenant Based Rental Assistance Program in the 2022 program year.

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

The City of West Palm Beach strives to provide an integrated array of housing and services in an effective and cost-efficient manner for the greatest number of persons experiencing homelessness. While West Palm Beach has not yet achieved its ultimate goal of ending homelessness, the City has been able to capitalize on existing opportunities as it navigates through complex systemic challenges.

The City has made gradual yet progressive strides toward eradicating homelessness and will continue to provide assistance to its homeless population. The City's goal is to find transitional and permanent housing for the homeless while providing stable and secure support services. The City actively worked with homeless providers to help families move out of poverty through the funding and implementation of public service activities that promoted self-sufficiency and job attainment and retention skills. This also included community development activities that assisted the homeless and the near homeless to become active members of the community.

Recognizing that much of its homeless population had a difficult time accessing services for a variety of reasons (i.e. lack of transportation, mental health issues, or comorbidity disorders) the City made the funding of outreach services a high priority. By taking needed services to this population at locations they frequent, the City's outreach team was able to intercede and intervene in ways that has increased access to community resources and helped reduce barriers to these services for homeless residents. The Homeless Outreach Program staff worked daily with homeless individuals to provide linkages to local programs and mental health resources.

Based on the proposal of a homeless committee consisting of concerned residents and homeless agencies, the City hired a Community Services Supervisor, responsible for the coordination of the street outreach teams, housing navigation, business education, and supportive services. In addition, the Homeless Activity Reporter, a web-based tool, was created to allow persons experiencing homelessness and/or at risk of homelessness to report their situation to improve the connection to needed services. As a result, the City now has a centralized and coordinated effort to more effectively allocate resources, services, and programs to best address the needs of those experiencing homelessness in the community.

Resources Available

Through its Department of Housing and Community Development, particularly its Community Services, operating from the Eva W. Mack Community Hub (formerly Vickers House), the City provides funding, direct services, and programs for the homeless including the following: permanent housing; supportive housing; rapid rehousing; food assistance; relocation assistance; assessments; referral services; and job placement assistance. The Community Services Division staff consists of 10 full-time employees.

The City works closely with the Homeless and Housing Alliance (HHA) of Palm Beach County (the Continuum of Care lead agency) whose main function is to deliver a comprehensive and coordinated continuum of services for homeless individuals, families with children, veterans, and unaccompanied youth. This system's fundamental components include the following: homeless prevention; outreach and assessment; emergency shelter; supportive services; permanent housing; and supportive housing.

The City also facilitates a monthly meeting where homeless agencies and City staff share information, explore resources for clients in need, and discuss ways to streamline the point of entry for potential clients. This has helped better target the use of the limited resources that are offered to people who are experiencing homelessness. It has also assisted in prioritizing assistance based on vulnerability and severity of service needs to ensure that people who need assistance the most can receive it in a timely manner.

The City leverages its resources with nonprofit and private sector organizations. For PY 2022, the following resources were available for various homeless assistance programs and activities that are supported or delivered by the City:

- Engagement team & Peer Outreach Program – City/HCD: \$145,000 (CDBG funding) and \$150,000 from the WPB Downtown Development Authority
- Homeward Bound bus pass and relocation services - \$10,000 annually (local funding)
- Tenant-based rental assistance (TBRA) and supportive housing - \$3.2M annually (HOPWA funding)
- Rental Deposit Assistance/Housing Stabilization - \$40,000 annually (State/SHIP funding)

The City's Police Department and law enforcement professionals further support the City's efforts by providing direct outreach to homeless individuals, building partnerships with a wide range of service providers, and encouraging its officers to be resourceful and show compassion for homeless persons. The Police Department has dedicated one (1) full-time officer who primarily deals with homelessness issues and has Community Engagement Officers who also support the homelessness prevention efforts through working with the City's Outreach Team,

Mental Health America, and area faith-based organizations. The Police Department also focuses its attention on nuisance related crimes and the areas listed below:

- Park Enforcement: Officers patrol City parks, offer assistance, and make arrests, as necessary.
- Illegal Solicitation: Officers check for panhandlers/trespassers on the I-95 off ramps, offer assistance, and make arrests, as necessary. Officers also work with FDOT who respond to issues and clean up trash and debris when needed. They also enforce aggressive panhandling ordinances in downtown and other areas frequented by solicitors.
- Partnerships and Referrals: Officers work with numerous external entities to assist individuals with seeking services such as Homeward Bound and other permanent housing solutions. They perform referrals to the Lewis Center and transport homeless to the facility. Officers also partner with internal organizations such as the Fire Department, Library Department, HCD, and CRA to address varying needs. Most importantly, officers educate business owners and residents about homeless individuals' rights and what is needed to properly enforce trespassing laws.

Police officers recognize that enforcement actions and other efforts alone will not address the issue of homelessness. The City cannot police its way out of homelessness; however, outreach and law enforcement continue to be an important tool to address homelessness issues.

Overall, the City works closely internally and with many committed and talented social service providers, faith-based organizations, and substance abuse treatment centers on various programs and activities. City partners include but are not limited to:

- Senator Philip D. Lewis Homeless Center;
- Homeless and Housing Alliance (HHA) of Palm Beach County;
- Homeless Coalition of Palm Beach County;
- Palm Beach County Division of Human Services;
- The Health Care District of Palm Beach County;
- Continuum of Care and Ryan White Service Providers;
- The Lord's Place;
- Catholic Charities;
- Mental Health America;
- West Palm Beach VA Medical Center;
- Gulfstream Goodwill;
- St. Ann Place;

- Vita Nova;
- South County Mental Health;
- Family Promise; and
- Center of Hope

Homelessness Services Accomplishments

In fiscal year 2022-2023 (October 1, 2022 – September 30, 2023) the following was accomplished:

- **246** individuals experiencing chronic homelessness were connected to housing.
- **86** individuals experiencing chronic homelessness were reconnected with a loved one or family member.
- **317** individuals were provided with referrals and access to mental health and substance abuse resources.
- **165** local businesses and community groups were provided education and resources.
- **232** requests for assistance were submitted and addressed through the City's online Homeless Activity Reporter (HAR).
- **1,485** engagements were conducted through city parks, neighborhoods and targeted areas.

Addressing the emergency shelter and transitional housing needs of homeless persons

The Senator Philip D. Lewis Center, a 66-bed emergency facility, serves as the main point of access for homeless services in Palm Beach County including access to emergency shelter, rapid rehousing and permanent supportive housing services. Homeless individuals and families are referred to the Lewis Center from both the Community Services Division staff and the West Palm Beach Police Department. Staff of the Community Services Division also assists the Lewis Center with conducting initial screenings over the telephone. The City of West Palm Beach will continue to support efforts to provide additional shelter and transitional housing beds as funding permits.

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 City provides funding for several services and programs for the homeless including the

following: permanent housing; supportive housing; rapid rehousing; food assistance; relocation assistance; assessment; referral services; and job placement assistance. The City is also an active member of the Palm Beach County Homeless and Housing Alliance and actively supports the goals of the Palm Beach County Homeless Coalition. In addition, the City continued to work with service providers to coordinate basic needs such as food, transportation, employment, and healthcare which has helped provide stabilization for many homeless or at-risk of homelessness. Furthermore, the City used SHIP funding to provide rental housing assistance through its Housing Stabilization Program, which helped 23 households avoid homelessness or come out of homelessness. Additionally, through the HOPWA TBRA program, 226 households were assisted with rental assistance.

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

In addition to the intake, assessment, and referrals provided at the Lewis Center and other homeless providers the City provides one time funding of up to \$7,500 for eligible applicants facing evictions or experiencing homelessness to obtain safe, decent and affordable rental housing in the City of West Palm Beach. The City also partners with local churches to help. The City will continue to fund this program during the 2020-2024 Strategic Plan period.

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

Actions taken to address the needs of public housing

During PY 2022, there were no specific public housing goals in the Annual Action Plan. However, the City continued to collaborate with both the West Palm Beach Housing Authority (WPBHA) and the Palm Beach County Housing Authority (PBCHA) on various programs and initiatives including community services, HOPWA, homelessness, and affordable housing opportunities.

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

Both the WPBHA and the PBCHA administer the Family Self-Sufficiency (FSS) Program for its residents. The FSS Program enables families to increase their earned income and reduce their dependency on rental subsidies.

The PBCHA annually budgets \$25.00 per household to establish and fund Resident Councils at each of its public housing sites. The PBCHA has a Resident Advisory Board (RAB) which is made up of housing authority residents. The RAB provides recommendations to the PBCHA regarding its annual plans and policy changes.

The WPBHA also has Resident Councils. In addition, the WPBHA is a HUD approved Housing Counseling Agency that provides home buyer workshops to its residents. During PY 2021, 103 residents participated in the FSS program and four (4) participants achieved homeownership as a result of the programs offered by the WPBHA.

Actions taken to provide assistance to troubled PHAs

Not applicable. Neither of the two housing authorities are 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)

Annually, the City assembles an Affordable Housing Advisory Committee (AHAC) for the purposes of completing a Housing Incentive Strategies Report that recommends affordable/workforce housing regulatory incentives. The most recent Housing Incentive Strategies Report recommended specific actions or initiatives to encourage or facilitate the removal of regulatory barriers that limit or increase the costs of development and the preservation of affordable and workforce housing units in the City.

The recommendations outlined in the report included the modification or repeal of existing policies, procedures, ordinances, regulations, or plan provisions; the creation of exceptions applicable to affordable housing; or the adoption of new policies, procedures, regulations, ordinances, or plan provisions, including recommendations to amend the local government comprehensive plan and corresponding regulations, ordinances, and other policies.

The recommended incentives which have been approved by the City Commission include expedited permitting, modification of impact fees, density flexibilities for affordable housing, allowance of affordable accessory residential units in residential zoning districts, waiver of capacity charges for water and wastewater for affordable housing projects, reduction of parking and setback requirements, maintaining an inventory of public land for affordable housing, an ongoing process for review of policies and plan provisions that increase the cost of housing, among other incentives.

Reductions and fee waivers were applied to several projects in PY 2022 ranging from single family homeownership projects developed by affordable housing partners to multi-family rental development projects. Over five projects received water/waste capacity fees waivers valued at almost \$130,000.

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

The City of West Palm Beach employed several strategies that targeted investments in the areas of greatest need while taking advantage of leveraging opportunities. While some programs were offered on a city-wide basis to eligible households, others were targeted to specific geographic areas where a specific need has been identified or where leveraging opportunities provided for greater scale and impact.

The City has placed a greater emphasis on the Tamarind Avenue corridor and surrounding areas of Coleman Park due to opportunities to leverage other resources such as the vacant parcels owned by the City. The City donated lots to nonprofit developers such as Neighborhood Renaissance for the development of owner-occupied housing within the targeted neighborhood. The City continued these efforts during PY 2021 and PY 2022 by providing SHIP funding for the new construction of two single family homes by Neighborhood Renaissance and rehabilitation of three single family homes by Community Partners. Two of these five single family homes were completed and transferred to homeowners in PY 2022. Construction of the remaining three homes is scheduled to be completed in December 2023.

In PY 2022, the City completed construction of its new community resource center, the Eva W. Mack Community Hub, the central location for provision of social services by HCD. The HCD Community Resources Division continued to work closely with Palm Beach County, local housing authorities, social services agencies, and other community partners to coordinate efforts and determine the best use of resources to combat homelessness.

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

The City continues to align its program procedures with HUD's regulations derived from Title X of the Housing and Community Development Act of 1992.

The procedures that are implemented to reduce lead-based paint hazards are as follows:

- Identify lead hazards;
- Perform lead hazard reduction, using safe work practices and achieving clearance;
- Treat defective paint surfaces, either by covering the surface with a permanent wall covering (such as wallboard) or by safely scraping and repainting the surface;
- Implement ongoing maintenance where required;
- Respond to lead poisoned children;
- Obtain training for contractors and program staff on lead hazard evaluation and reduction;
- Develop methods and assemble materials to educate rental property owners, homeowners, and occupants of rental housing about the new requirements;
- Establish working relationships with lead professionals and key partners, such as risk assessors and clearance technicians, public health and HUD lead grantees; and
- Create procedures for determining when it is more cost-effective to presume that lead hazards are present and to evaluate a property.

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

The City, through its Departments of Housing and Community Development, Economic Development, Planning and Zoning, and the City Community Redevelopment Agency are providing programs and developing strategies that will assist with the reduction in poverty within the jurisdiction. These program and strategies include providing incentives for job creation and economic development through grant and loan programs that assist micro-enterprise development and new businesses both large and small along with providing zoning flexibilities that help spur economic investments. The City, including the CRA, is also investing in infrastructure projects in low and low-moderate income areas, helping to create a better investment environment and job creation.

The development and preservation of affordable and workforce housing for both homeownership and rental is another key strategy the City is pursuing along with providing temporary rental assistance through the City's Rapid Rehousing Program and other homeless prevention efforts. Through the programs offered by the Community Services Division, the City provides assistance to help vulnerable populations, including the homeless, elderly, disabled and targeted at risk youth to access services, get assistance with basic needs and learn new skills that help individuals reach their potential.

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

The City of West Palm Beach is the largest city and metropolitan area of Palm Beach County and therefore benefits from close proximity and association with public entities such as the County and private nonprofit and for-profit organizations that call West Palm Beach home. The two entities that play the largest role in affordable housing are the West Palm Beach Housing Authority and the Palm Beach County Housing Authority. Those entities collaborate on a regular basis with the City on various programs and initiatives including affordable housing opportunities, homelessness, community services, and HOPWA. The City also has certified CHDOs that assist with development of affordable housing. The City continues to utilize the infill lot donation program that has allowed for local organizations such as Habitat for Humanity, Neighborhood Renaissance, and other nonprofit entities to receive donated City owned lots for affordable housing development. This has allowed for increased capacity of these nonprofit entities. There are a limited number of nonprofit housing development entities with capacity within the jurisdiction, especially for at-risk populations. The City continues to enhance its capacity building effort and also seek to locate new partners, both nonprofit and for-profit who have the expertise and capacity to finance and develop affordable and workforce housing.

The Palm Beach County Homeless and Housing Alliance provides the structure to advance programs and resources that aide and prevent homelessness. One of the main sources for services is the Senator Philip D. Lewis Center, which acts as a single point access center. This

delivery system reduces duplication and improves coordinated efforts. The City of West Palm Beach continues to work with the Continuum of Care providers and the Homeless Coalition to find additional resources and strategies to address the needs of the homeless population and prevent homelessness from occurring while also leverage existing and new resources from the City's Eva W. Mack Community Hub.

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

The City has taken great strides to establish a strong working relationship with the two primary housing authorities that serve the jurisdiction, the West Palm Beach Housing Authority and the Palm Beach County Housing Authority. The City has provided and will continue to provide support to those two entities to support their affordable housing efforts. As the primary provider of Tenant-Based Rental Assistance for the HOPWA program, the Palm Beach County Housing Authority will continue to work with the City to expand its role in providing housing assistance to at risk populations and working closer with the Ryan White and Continuum of Care service providers. Since PY 2016 that partnership was enhanced through a national pilot program that provides for client data sharing between HOPWA providers and Ryan White providers.

In PY 2015 the City started to place a greater emphasis on collaboration with Palm Beach County's Departments of Human Services and Housing and Economic Sustainability. Those efforts have continued in PY 2022 and beyond as the City seeks ways to leverage housing and community development resources and avoid duplication of efforts. That partnership has led to the development of a data sharing agreement for HOPWA and Ryan White programs, increased capacity to serve the homeless populations and several leveraging opportunities for homeownership development, and partnership to serve persons impacted by the COVID-19 pandemic through rental assistance or other eligible HOPWA-CV activities such as supportive services, transportation, short-term rent, mortgage, and utility assistance, and the leasing of hotel/motel. The City will continue to coordinate with the Homeless Continuum of Care, Homeless Coalition and Ryan White service providers. The City also has expanded its collaborative efforts with the Housing Leadership Council of Palm Beach County and the Florida Housing Coalition.

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 Housing and Community Development Department has placed great emphasis on ensuring that the City complies with HUD regulations at 24 CFR 91.520 and related Fair Housing and Equal Opportunity (FHEO) program requirements. The City's Analysis of Impediments to Fair Housing

identified the following actions to overcome the barriers to fair housing choice:

- Continue to enforce local, state and federal fair housing laws by reporting violations and allegations of violations to the appropriate government agency;
- Provide information on fair housing laws to the public, its staff, Realtors, property owners and lenders through educational activities including workshops, public service announcements and presentations to targeted groups;
- Continue to staff a position to act as a Fair Housing Liaison;
- Update its website provide more online content related to fair housing information and where to file a complaint; and
- Provide education and outreach to landlords, providing information on fair housing rights to HCD clients, promoting fair housing month and providing funding for fair housing activities.

During 2020, the Mayor launched the “West Palm Beach Mayor’s Task Force for Racial and Ethnic Equality” to identify and help address issues of racial/ethnic equity in several areas including real estate and housing. The taskforce made several policy recommendations for expanding options for decent and affordable housing for both homebuyers and renters, mitigating financial barriers, and increasing programs and funding for prospective homebuyers. The City will monitor and report on the implementation of the recommendations going forward.

In 2021, the City was a recipient of a grant from the Florida Housing Coalition (Coalition) for the “Closing the Gap” Program, a two-year initiative of the Coalition’s Center for Racial Equity. Closing the Gap is a community-centered, sustainable, and systemic effort to close the gap in homeownership between the Black and white community. During the 24-month grant period, the Coalition will provide technical assistance on the history, policies and practices, and the programs that impact racial inequity in housing and will help to formulate innovative solutions. Phase I of the Closing the Gap Initiative, development of an Equity Profile, was underway during the 2021 program year. The Equity Profile will provide a deeper look into the history of injustice and the legacy of inequality in West Palm Beach. The Equity Profile will present recommended strategies to address racial disparities in homeownership.

CR-40 - Monitoring 91.220 and 91.230

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

The City's Department of Housing and Community Development is responsible for ensuring that the federal funds spent on activities to benefit low- and moderate-income households are in compliance with federal guidelines. All subrecipients, contractors, developers, and project sponsors enter into contractual agreements with the City of West Palm Beach. These agreements include a detailed scope of services with measurable objectives. The federal provisions, along with the appropriate OMB Circulars, are also included in contractual agreements to ensure compliance and are included as part of the City's monitoring reviews for compliance.

The City of West Palm Beach monitors its grant programs in accordance with local program policies and procedures and federal regulations. The Department of Housing and Community Development staff continues to monitor all subrecipients of CDBG, HOME, and HOPWA funds. The monitoring process includes on-site reviews of the subrecipients' performance to ensure compliance with the goals and objectives of the program and federal regulations. The City's staff also monitors agencies through desk reviews of their monthly or quarterly performance reports, requests for payments, and their annual audit reports.

The Department of Housing and Community Development coordinates with the Finance Department regularly to review accounting records and compliance with OMB regulations. The Internal Auditors Office reviews the annual audit reports the City receives from its federal grant subrecipients.

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 City of West Palm Beach has devised specific actions to encourage increased participation in its housing and community development programs. Interested groups and individuals are encouraged to provide input into all aspects of the City's consolidated planning activities – from assessing needs and setting priorities through performance evaluation.

As required by HUD regulations, the City provided a 15-day public notice to the public for review and comment on the CAPER prior to its submission to HUD. An ad was published in the official

local newspaper of general circulation (The Palm Beach Post Newspaper). Copies of the plan were made available to the general public. The public was invited to review and comment on the 2022-2023 CAPER. The City accepted comments until December 22, 2023.

CR-45 - CDBG 91.520(c)

Specify the nature of, and reasons for, any changes in the jurisdiction's program objectives and indications of how the jurisdiction would change its programs as a result of its experiences.

During PY 2022 there were no changes to the CDBG Entitlement program objectives and the City continued to move forward with the implementation of public facility improvements in qualified low- and moderate-income census tracts as well as the provision of public service activities. The public services activity in the PY22 Action Plan was primarily intended to fund the salary and benefits for a new position with the Community Services Division, a Social Services Administrator whose responsibilities would include overseeing the homeless outreach team. The CDBG funds allocated for this purpose were not expended and as such, the City reprogrammed the funds to increase the budget to carry out other public facility or improvement projects.

The City made a substantial amendment to the 2020 Annual Action Plan to add supplemental CDBG funding (CDBG-CV) of \$1,584,650 as a resource to prevent, prepare for, and respond to the coronavirus (COVID-19). The City has directed CDBG-CV funding to projects that will help to prevent the spread of COVID-19 as part of a longer-term recovery effort. During PY 2022, the City expended \$737,370 in CDBG-CV funds as follows: program administration (\$24,000), a health services project being implemented by the Esperanza Community Center Outreach Program (\$30,720), community gardens and food nutritional programming in partnership with Florida A&M University (\$82,650), and the Clear Lake Multipurpose Trail (\$600,000).

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

No

CR-50 - HOME 91.520(d)

Include the results of on-site inspections of affordable rental housing assisted under the program to determine compliance with housing codes and other applicable regulations

According to 24 CFR 92.504(d), the City is required to conduct an on-site inspection of HOME-assisted properties within 12 months after the completion of the project and ongoing property inspections must be completed at least once every three years during the period of affordability. The City enforces a more stringent requirement for ongoing inspections and inspects HOME-assisted units annually. The following projects were due for inspection in PY 2022. No issues were identified during the on-site inspection of the projects.

Project Name	Number of HOME-Assisted Units	Date of Initial Inspection	Deficiency
Malibu Bay	5	7/13/23	None
Georgian Gardens	4	5/25/23	None
1016 23 rd Street	1	9/27/23	None
Henrietta Townhomes	11	9/20/23	None

Provide an assessment of the jurisdiction's affirmative marketing actions for HOME units. 92.351(b)

The Department complies with all Equal Opportunity requirements on the basis that "No person in the United States shall on the grounds of race, color, national origin, religion, or sex be excluded from participation in, be denied benefits of, or be subject to discrimination under any program or activity funded in whole or in part with HOME funds." HOME funds were made available in accordance with the requirements of the Fair Housing Act (42 U.S.C. 3601-20). The City of West Palm Beach and its developer partners took the necessary steps to affirmatively market the HOME program through public meetings, distribution of literature, and other good faith efforts.

Affirmative marketing efforts were directed to eligible persons from all racial, ethnic and gender groups in the housing market to HOME units supported by the City's HOME program. Rental owners, CHDOs and other participating agencies were informed and entered into agreements where it was indicated that they are required to maintain records documenting their affirmative marketing actions. Such records shall include copies of advertisements, brochures, applications, and income certifications. Participants will be informed if they met the Affirmative Marketing

requirements and what corrective actions, if any, are recommended. Recipients of City HOME CHDO funds were encouraged to utilize small business contractors and subcontractors including minority contractors. Outreach efforts were reviewed through copies of bids, contracts, advertisements or other appropriate documents which will demonstrate small business outreach efforts. The records also included a description and dollar amount of all work performed by small business firms in connection with HOME assisted projects.

The requirements of the Code of Federal Regulations (24 CFR Section 92.350) relating to small business enterprises were incorporated into all agreements with rental owners, CHDO's, and other agencies receiving HOME funds.

Refer to IDIS reports to describe the amount and use of program income for projects, including the number of projects and owner and tenant characteristics

The HOME program received \$2,853 in program income during PY 2022. These funds will be carried over to PY 2023 for program activities. Program income received was the result of amortizing loan principal payoffs associated with previous HOME-funded projects and the collection of current interest payments.

Describe other actions taken to foster and maintain affordable housing. 91.220(k) (STATES ONLY: Including the coordination of LIHTC with the development of affordable housing). 91.320(j)

In August 2021, the City Commission approved the creation of the Downtown Master Plan (DMP) Housing Incentive Program for the purpose of promoting the construction of residential units for families earning between 60% and 100% of the area median income within the Downtown. The program offers additional development capacity through the transfer of development rights program within the downtown and surrounding areas. The City adopted changes to the DMP Housing Incentive Program for clarification purposes in January 2023 and approved the Downtown Housing Incentive Program Implementation Guide. During PY 2021, the City continued to explore policy actions to increase the supply of affordable housing. This included the creation of standards for the review of residential projects subject to Section 166.04151, Florida Statutes, providing for the development of affordable housing on parcels zoned for residential, commercial, or industrial use, codified in December 2022. With the adoption of Senate Bill 102, the Live Local Act, the City plans to initiate Comprehensive Plan amendments and code amendments to the land development regulations to comply with the state policy while continuing with permitted provisions under the adopted City's workforce housing provisions, Resolution 306-22.

CR-55 - HOPWA 91.520(e)

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

Table for report on the one-year goals for the number of households provided housing through the use of HOPWA activities for: short-term rent, mortgage, and utility assistance payments to prevent homelessness of the individual or family; tenant-based rental assistance; and units provided in housing facilities developed, leased, or operated with HOPWA funds.

Number of Households Served Through:	One-year Goal	Actual
Short-term rent, mortgage, and utility assistance payments	0	0
Tenant-based rental assistance	230	226
Units provided in transitional housing facilities developed, leased, or operated with HOPWA funds	0	0
Units provided in permanent housing facilities developed, leased, or operated with HOPWA funds	0	0
Total	230	226

Table 14 – HOPWA Number of Households Served

Narrative

The City of West Palm Beach is the recipient of the HOPWA formula grant for the Palm Beach County Eligible Metropolitan Statistical Area (EMSA). The City ensures that the HOPWA program is administered and implemented both programmatically and fiscally in accordance with federal, state, and local regulations and guidelines. The HOPWA grant serves income eligible persons and families living with HIV/AIDS throughout Palm Beach County. Housing availability, affordability, and accessibility are major concerns in Palm Beach County.

During PY 2022, the City partnered with the Palm Beach County Housing Authority (PBCHA) to provide housing subsidy assistance and support services for income eligible persons living with HIV/AIDS in Palm Beach County. These services included Tenant-Based Rental Assistance (TBRA) and Supportive Services including the provision of case management, client advocacy, and access to benefits and services.

The City worked with PBCHA to coordinate services and ensure optimal utilization of HOPWA resources. The City and its HOPWA project sponsor increased collaboration with the Palm Beach County HIV CARE Council and Ryan White Provider meetings in an effort to determine the unmet housing needs of HIV/AIDS clients. The City is also working closely with Palm Beach County on a data integration project with the Palm Beach County Ryan White Part A program and its award

of a HHS/HUD “Addressing HIV Care and Housing Coordination Through Data Integration” grant. The grant funds were provided by the RAND Corporation with the goal of improving health outcomes along the HIV Care Continuum.

During FY 2020, the City received a supplemental award of HOPWA funding under the CARES Act referred to as HOPWA-CV. The HOPWA-CV funding was subawarded to Palm Beach County (Community Services Department) for various eligible activities including the provision of supportive services, permanent housing placement, leasing hotels/motels to quarantine HOPWA eligible persons or their household members, and the payment of short-term rent, mortgage, and utility payments for up to 24 months. The County has three years in which to expend the program funding of \$440,000 to serve up to 120 households.

Additional information is provided in the HOPWA CAPER.

CR-58 – Section 3

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

Total Labor Hours	CDBG	HOME	ESG	HOPWA	HTF
Total Number of Activities	1	0	0	0	0
Total Labor Hours	8,232				
Total Section 3 Worker Hours	5,218				
Total Targeted Section 3 Worker Hours	0				

Table 15 – Total Labor Hours

Qualitative Efforts - Number of Activities by Program	CDBG	HOME	ESG	HOPWA	HTF
Outreach efforts to generate job applicants who are Public Housing Targeted Workers					
Outreach efforts to generate job applicants who are Other Funding Targeted Workers.					
Direct, on-the job training (including apprenticeships).	1				
Indirect training such as arranging for, contracting for, or paying tuition for, off-site training.					
Technical assistance to help Section 3 workers compete for jobs (e.g., resume assistance, coaching).					
Outreach efforts to identify and secure bids from Section 3 business concerns.	1				
Technical assistance to help Section 3 business concerns understand and bid on contracts.					
Division of contracts into smaller jobs to facilitate participation by Section 3 business concerns.					
Provided or connected residents with assistance in seeking employment including: drafting resumes, preparing for interviews, finding job opportunities, connecting residents to job placement services.					
Held one or more job fairs.					
Provided or connected residents with supportive services that can provide direct services or referrals.					
Provided or connected residents with supportive services that provide one or more of the following: work readiness health screenings, interview clothing, uniforms, test fees, transportation.					
Assisted residents with finding child care.					
Assisted residents to apply for, or attend community college or a four year educational institution.					
Assisted residents to apply for, or attend vocational/technical training.					
Assisted residents to obtain financial literacy training and/or coaching.					
Bonding assistance, guaranties, or other efforts to support viable bids from Section 3 business concerns.					
Provided or connected residents with training on computer use or online technologies.					
Promoting the use of a business registry designed to create opportunities for disadvantaged and small businesses.					
Outreach, engagement, or referrals with the state one-stop system, as designed in Section 121(e)(2) of the Workforce Innovation and Opportunity Act.					
Other.					

Table 16 – Qualitative Efforts - Number of Activities by Program

Section 3 is a provision of the Housing and Urban Development Act of 1968. The purpose of Section 3 is to ensure that employment and other economic opportunities generated by certain HUD financial assistance shall, to the greatest extent feasible, and consistent with existing Federal, State, and local laws and regulations, be directed to low- and very low-income persons, particularly those who are recipients of government assistance for housing, and to business concerns which provide economic opportunities to low- and very low-income persons. Section 3 applies to housing and community development financial assistance projects assisted under HUD programs when the total assistance to the project exceeds a threshold of \$200,000.

During PY 2022, the City utilized CDBG-CV funding for one project that was subject to the new Section 3 regulations at 24 CFR Part 75, that is, the Clear Lake Trail Multipurpose project. The City continues to maintain records of Section 3 compliance in project files for HUD-funded projects committed before the November 30, 2020 effective date of the Section 3 Final Rule.

For the Clear Lake Trail project, between January – September 2023, the total number of labor hours worked by all workers for the project was 8,232 hours. A total of 34 Section 3 workers worked 5,218 or 63% of the total labor hours. This project exceeded the 25 percent benchmark for Section 3 worker labor hours but fell short of the 5 percent benchmark for Targeted Section 3 workers. However, qualitative efforts were made by the City and the contractor to provide low- and very low-income persons with employment and job training opportunities. The City conducted outreach efforts to identify and secure bids from Section 3 business concerns to carry out the project. The prime contractor selected for the Clear Lake Trail project did not qualify as a Section 3 Business, however, the contractor has provided direct, on-the job training for Section 3 workers.