

CITY OF SAINT CHARLES, MISSOURI
COMMUNITY DEVELOPMENT BLOCK GRANT (CDBG)
FIVE YEAR CONSOLIDATED PLAN 2016-2020
FY 2017 Year Two Annual Action Plan
Consolidated Annual Performance Evaluation Report (CAPER)



City of Saint Charles, MO
Department of City Development



200 North Second Street, Saint Charles, Missouri
Phone: 636-949-3222 Fax: 636-949-3557

2017 Consolidated Annual Performance and Evaluation Report (CAPER)
The City of St. Charles, Missouri
Community Development Block Grant, (CDBG)

First Year of the Five Year Consolidated Annual Action Plans 2016 - 2020

GENERAL

Responses to CAPER questions for CDBG, and HOME funded activities are required by grantees. Grantee must respond to each question in order to be compliant with the Consolidated Planning Regulations.

The Executive Summary is listed below on pages 1 – 5. The General questions that require responses begin on page 5.

Program Year 2 CAPER Executive Summary: The purpose of this document is to inform the public and the U.S. Department of Housing and Urban Development, (HUD) how the City of St. Charles used federal funds to meet it's goals in the 2017 Annual Action Plan.

CDBG Purpose. The Office of Community Planning and Development's, (CPD) formal programs are administered by HUD which provides funding for housing, community and economic development activities, and assistance for low and moderate income persons, households, and special needs populations.

All CDBG assisted activities must meet eligibility criteria and meet one of three National Objectives.

The activity must either:

1. Benefit low and moderate income persons through;
 - A) Area Benefit Activities,
 - B) Limited Clientele Activities,
 - C) Housing Activities,
 - D) Job Creation\Retention.
2. Aid in the prevention or elimination of slums or blight; or
3. Meet a need having a particular urgency (commonly referred to as "urgent need")

The basis for the proposed objectives, goals and strategies, to achieve desired outcomes is mainly to sustain and improve the inclusive livability of the St. Charles City Community for all persons.

During the public consultation process for the development of the City's Five Year Plan a list of the following needs were identified:

Priority Needs

1. Affordable Decent Safe Rental Housing
2. Affordable Decent Safe Owner Housing
3. Accessible Housing for Special Needs Populations
4. Economic Opportunities-job assistance services for special needs and low income persons
5. Address the Unmet Needs of the Homeless Population in the City of St. Charles, that population includes the youth, battered women and their children, and single men.
6. Homelessness Prevention Services, food, rent, utility and mortgage assistance.

During the Five Year Consolidated Plan period 2016 - 2020 the use of CDBG and other grants will help to strengthen and sustain the community.

Program Goals

1. Provision of Decent Housing
2. Provision of Safe Livable Environments
3. Expand Economic Opportunities
4. Affirmatively Further Fair Housing and Equal Opportunity

Program Activities

1. Home Improvement Program (HIP or HILP), Loans and Grants
2. Code Enforcement
3. Public Services
4. Administration

Strategies

1. Through Code Enforcement Activities: Increase the quality and availability of affordable decent safe rental housing.
2. HILP: Improve the quality of decent safe affordable owner housing.
3. Through HIP: Increase the range of housing options and related services for those with special needs with a focus on veterans, the elderly and disabled people's needs.
4. Through Public Services: Increase the number of persons moving from homelessness or transitional housing to permanent housing with a focus on our veterans and single men.
5. Through Public Services: Improve the services for low-income persons.
6. Through HILP and Public Services: Improve economic opportunities for low-income persons.
7. Through NSP: Increase affordable housing units for low-mod and middle income households.

Other Strategies provided through additional grant sources

1. Neighborhood Stabilization Program Grant (NSP). The program to purchase foreclosed properties stabilizes property values, and provides affordable decent safe housing to low – moderate – middle income 1st Time Home Buyers.
2. St. Louis HOME Consortium (HOME). A program that provides housing counseling to 1st Time Home Buyers and funds for down payment and closing costs.

The objectives for the City of St. Charles Community Development Block Grant Five Year Consolidated Action Plan 2016 - 2020 and the Annual Action Plan for FY2017 are also aligned with the Livability Principles described by the Partnership for Sustainable Communities, which includes HUD, the Department of Transportation, and the Environmental Protection Agency.

The City of St. Charles works from the local level to assist and align its goals with those of HUD's. In 2017, the City worked with HUD to achieve it's mission to create strong, sustainable, inclusive communities and quality affordable homes for all. The 2017 CAPER describes how the City was able to align its programs with four of HUD's goals which are to:

1. Strengthen the Nation's Housing Market to Bolster the Economy and Protect Consumers: The City assisted by providing programs that educated the public on matters such as Fair Housing, Financial Literacy, and Foreclosure Prevention. The NSP, Homeownership Assistance, and Home Improvement Programs, all contributed to strengthening the housing market at a local level. These programs put people in homes, keep people in homes, and put carpenters and tradesmen to work, which had a positive impact on the local economy. The Code Enforcement

activity helped to protect consumers by working with the HIP client to insure they are getting a fair bid and the work on their homes was completed properly.

2. Meet the Need for Quality Affordable Rental Homes:

The City assisted by funding the Code Enforcement Program to insure existing affordable rental housing stock in low-moderate income neighborhoods met a higher standard than HUD's Housing Quality Standard, (HQS). Rental properties in the low-moderate income neighborhoods exist primarily in Wards 1 and 2 of the City and were thoroughly inspected for health and safety violations. No rental units were occupied until all required measures were corrected, so that all the properties were safe for occupancy. The Code Enforcement Officer (CEO) also inspects homes in the same manner for the Home Improvement Program (HIP), Homeownership Assistance also known as Down payment Assistance, (DPA) and the Neighborhood Stabilization Programs, (NSP).

3. Utilize Housing as a Platform for Improving Quality of Life:

The City assisted HUD by funding public services that provide emergency utility, rent and mortgage assistance, food pantries, and other types of services for those in extreme poverty and prevented homelessness. Programs such as HIP, HILP, DPA, NSP, and Rental Occupancy also contributed significantly to this goal. Within the HIP homes may be energy audited and measures are taken to insure homes are weatherized to be more energy efficient, and essentially making the home more comfortable and affordable. The CDBG Administrator conducts visual lead assessments for home built prior to 1978. When evidence of lead appears to be present the property is tested by a Lead Certified Firm. If the property tests positive for lead then the client is referred to the Lead Remediation Program. The HIP & HILP provides smoke and carbon monoxide detectors for people with very low income and requires other participants to acquire and install them prior to the close out of their HILP projects. The City highly recommends its clients to purchase radon test kits. To date no radon gas has been detected. On occasion even flooring is tested for asbestos. There has been only one occasion where a client wanted to replace the flooring and it tested positive for asbestos. The City had the asbestos remediated by a qualified license contractor as it has done for the Lead Remediation Program. Making homes healthy, safe and affordable improves the quality of life for the resident.

4. Build Inclusive and Sustainable Communities Free from Discrimination:

The City assisted by working with the Public Housing Authority, Citizen's With Disabilities Advisory Board, Fair Housing Commission, Human Relations Commission, Developmental Disabilities Resources Board, Youth In Need, Connections to Success, Bridgeway Counseling Services, and with the St. Louis Metropolitan Equal Housing Opportunity Council to build inclusive and sustainable communities free from discrimination.

The goal of the Home Improvement Program is to preserve housing stock and to stabilize property values. If it were not for this program, 16 families would not have had the financial resources to make the necessary repairs to their homes.

Although the City had estimated the receipt of \$50,000 for program income from Home Improvement Loan repayments, the amount of program income received in 2017 was \$71, 410.00. The program income received was reported to HUD in the Integrated Disbursement and Information System (IDIS). Twenty percent of the program income received was used to fund additional administrative activities and fifteen percent was used to provide public services specifically temporary emergency shelter for the homeless, and the remainder was used to fund

additional home improvements. Some of the home improvements were loans and some were grants. Eight families were income qualified to receive loans with an average loan amount of approximately \$10,000 each. Eight people received grants ranging from \$300 - \$4,000. The majority of the grant clients was extremely low income and was owners of mobile homes. A total of sixteen properties were completed in 2017. Grants funded co-payments for the Sewer-Repair Insurance Program, and helped to repair mobile homes. Funds were earmarked to provided hazards testing for lead, radon, as needed and included lead remediation services, however, there were no proposed activities that required such treatment. Grants also provided accessible access for the disabled.

Summary of 2017 Performance for all CDBG Activities:

The City of St. Charles has been very successful in meeting all of its Consolidated Plan goals and objectives for all programs funded with CDBG and HOME funds. CDBG and HOME funded programs have provided the following activities: homeless prevention, housing counseling, fair housing education, code enforcement, home improvements for owner occupied units, energy efficiency, safe and healthy housing, accessible housing, improved economic opportunities, provided neighborhood stabilization of property values, provided affordable home ownership opportunities, and provided safe living environments for rental housing. To date, the City of St. Charles provided a total of 756 loans to low – moderate income households with CDBG funds.

The City partnered with the Continuum of Care forming a subcommittee named the Emergency Weather Response & Death Prevention Team. The Team was formed to provide temporary homeless shelter when the weather temperature was predicted to be below 20 degrees. The target population was homeless single men because they are not allowed to stay at the Salvation Army Shelter. Mayor Faith was in favor of the operation and assigned city staff including the Fire and Police Chiefs and CDBG Administrator to assist. A plan was formulated, policy and procedures were established, churches agreed to be temporary warming centers, and volunteers were trained. Fifteen percent of program income from the repayment of home improvement loans was used to cover the cost for temporary hotel stays between November 1 and December 31, 2017 in order for the church groups to get ready. The Fire Chief purchased cots and blankets and agreed to store them in their trailer and to deliver the trailer to the warming center during nights the center was operational. Beginning on January 1 through the month of March, several churches took turns hosting the warming centers. From November 1 – March 17 homeless people who would not otherwise qualify for services received temporary shelter. It was reported that Sts. Joachim and Ann Care Service was able to use their Rapid Re-housing Grant to assist 5 people with permanent housing. The remaining 12 people were assigned to case workers and are receiving mental health and other needed services.

This is the first time that all the members of the Continuum of Care worked together successfully to solve the unmet needs of homeless single men. The effort was expanded in the remainder of St. Charles County during the 2017 winter season.

Public Services Funded with CDBG assists the needs of the elderly, frail/ill, disabled, homeless, those that are abused, or those that are near homeless. Funding public services activities assists the City to meet its goals and objectives which are principally to prevent homelessness, address the needs of the homeless, and provide assistance to the elderly, disabled and/or those with very low incomes as stated in the FY 2017 CDBG Consolidated Annual Action Plan submitted to the U.S. Department of Housing and Urban Development The FY 2017 funding allocations was approved for total of \$48,69as follows:

Public Services Agency	Allocation	Activity Description
-------------------------------	-------------------	-----------------------------

Community Council of St. Charles County	\$15,000	Homeless services coordination and support for the Continuum of Care Board.
Mid-East Area Agency On Aging	\$10,000	Meals on Wheels for the elderly and disabled.
NECAC	\$5,000	Temporary homeless shelter and homeless prevention.
Sts. Joachim & Anne Care Service	\$5,000	Utility, rent, and/or mortgage assistance for financial fragile families.
We Love St. Charles	\$5,000	Homeless prevention and help with property maintenance for people with a disability.
OATS	\$8,691	Essential Transportation Program for the elderly and disabled.
Total	48,691	

Listed below is a summary of the racial characteristics of the families that received home improvement loans as noted above and their percentages of area median incomes (AMI) is as follows:

Regarding Language Used: Throughout this CAPER, the terms “White,” “Black” or “African American,” “Asian,” “Hispanic,” “American Indian / Alaska Native” and “Native Hawaiian / Pacific Islander” are used, consistent with the practices and data of the U.S. Census Bureau. The term “Multiracial” is used to denote persons of more than one race, simply because the term is shorter than that used by the U.S. Census Bureau. The term “person with disabilities” is used rather than the antiquated word “handicap” used in the Fair Housing Act statute. Although the City asks household for the demographics mentioned above, the table below is a shortened version and only notes the races of households actually served in 2017.

Below is a summary of the units of services provided FY2017 – Total Budget \$48,691.

	Unit s	Race				Household type			Income			
		White	Afr Amer	Hisp	Othe r	Female Headed	Elderl y	Disable d	30% AMI	50% AM I	80% AM I	Homeles s
2017 Summary												
MEAAA	52	50	1	1	0	0	52	52	39	13	0	0
We Love St. Charles	11	3	8	0	0	4	0	0	11	0	0	0
Sts. J&A	13	9	3	10	0	2	1	6	10	3	0	0
Community Council	20	19	1	0	0	0	0	0	20	0	0	20
2017 Totals	96	81	13	11	0	6	53	58	80	16	0	20

General Questions

1. Assessment of the one-year goals and objectives:

Describe the accomplishments in attaining the goals and objectives for the reporting period. 1.a. Response Provide a breakdown of the CPD formula grant funds spent on grant activities for each goal and objective.

Program Year 2 CAPER General Questions response:

1.a. Assessment of the one-year goals and objectives:

The basis for the proposed objectives, goals and strategies, is to assist the community to move forward with its action plan and to achieve desired outcomes. The City desires to sustain and improve the inclusive livability of the St. Charles City Community, for all people. Below is a list of priority needs:

Programs\Projects\Activities\Objectives

The FY 2017 funding allocations for the amended CDBG Consolidated Plan 2016-2020 anticipated funding in 2016 for FY17 was \$333,134.

Grant award notice provided by U.S. Department of Housing and Urban Development: \$324,610. Anticipated budget was reduced \$8,527 a .02% decrease. Not a significant reduction. According to Citizen's Participation Plan a 10% change to any activity will require a substantial amendment to the Annual Action Plan. The .02% dose not trigger this requirement. Reduced the Admin and Public services caps, per regulatory compliance and the remainder reduced the Home Improvement Program by \$5,544.

Project Name	Allocation	Explanation
Home Improvement Program Proposed \$146,540 reduced 5,554	\$140,997	Loans & Grants\ home repairs for low-moderate income residen
CDBG Administration \$ 66,627 \$64,922, reduced \$1,705	\$64,922	Program operations, fair housing, training, public notices. HUI Regulations cap administration funds at 20% of annual allocati and allow for 20% of program income receipts to fund admin.
Code Enforcement	\$70,000	CDBG area specific.
Public Services \$49,970 reduced \$1,278	\$48,691	Divided among applicants to support CDBG goals & objectives HUD Regulations cap this activity at 15% of annual allocation, and allows for 15% of program income receipt to fund addition public services.
Plus Anticipated Program Income	\$ 50,000	Funds received from loan payoffs will provide 20% for administration and 15% for public services and the remainder to fund additional home improvement loans and grants.
Total	\$374,610	FY15 Allocation \$333,137 plus estimated program income of \$50,000.

Home Improvement Program – Loans (HILP) & Grants (HIP)

*National Objective: LMC - LOW/MOD LIMITED CLIENTELE BENEFIT

Budget for 2017: \$140,997. Proposed Number of Completed Units Per Year 2016 - 2020 The Goal was to produce 20 units. The outcome was 25 units. The total amount of program income received from loan repayments was \$102,812. The total amount of grant funds spent including program income was \$201,445. Due to receipt of program income funds the city was able to work with CBDO Habitat for Humanity to build several homes. The City provided funds for the Habitat clients to be able to add basements with egress window and rough in plumbing for future living space. The addition of a basement provides several amenities including increased

home value, including value stabilization for the neighborhood, a place for the family to grow in place, a place of safety during storms, storage space. The City also assisted a Habitat homeowner with an expanded floor plan for a disabled household.

HILP is consistent with HUD Goals: 1. Strengthen the Nation's Housing Market to Bolster the Economy and Protect Consumers

HILP meets all of the Objectives identified in the CDBG Consolidated Plan 2016 - 2020

- A. Create Suitable Living Environment**
- B. Provide Decent Affordable Housing**
- C. Create Economic Opportunities**
- D. Furthering Fair Housing and equal housing opportunities for all people.**

Priority Needs

1. Affordable Decent Safe Rental Housing
2. Affordable Decent Safe Owner Housing
3. Accessible Housing for Special Needs Populations
4. Economic Opportunities-job assistance services for special needs and low income persons
5. Address the unmet needs of the homeless population in the City of St. Charles. That population includes youth, battered women and their children, and single men.
6. Homelessness Prevention Services include provision of food, and temporary rent, utility, and or mortgage assistance.

The need for decent housing for low and moderate income households is addressed by the Home Improvement Loan Program, HILP, and the Homebuyer Assistance Program. The HILP is designed to upgrade existing housing units occupied by low and moderate income homeowners to meet current health, safety, and to meet energy efficiency standards when possible. This includes installation of new roofs, new siding, gutters, upgrading electrical, plumbing, and heating and cooling systems, installation of replacement windows, insulation, and other needed repairs. Many clients have noted the added benefit of saving money on their utilities once various projects were completed. The conservation of energy is a very desirable effect of home improvements particularly for low to moderate income households. A large part of the City's grant was allocated for this program. The impact of the Home Improvement Loan Program has been substantial for specific households, and also for the neighborhoods where the homes are located. Wards 1 and 2 have the largest number of older housing stock, most affordable housing, and are where many low to moderate income households resides. In some cases, the improvement of one house has led to improvements on adjoining properties or the improvement to one house has removed an eyesore in an otherwise well-kept neighborhood.

HIP provides small grants for housing repairs and accessible home modifications for people with very low income and or for people with disabilities.

The Code Enforcement Activity is consistent with the CDBG objectives. Code enforcement has benefited renters by improving housing conditions in rental properties. A complete health and safety inspection is conducted on every housing unit prior to occupancy. The Rental Inspection Program has dramatically reduced the number of substandard rental units, not only in the CDBG areas but throughout the City.

General Questions Continued

1.b Response: A summary of the households served through the public services activities in 2017 is listed on page 6. It is estimated that the same number of persons or less were assisted in 2017 as in 2014.

Listed below is Table 2A, Priority Housing Needs Investment Plan Goals and reflects the number of units of services.

**City of St. Charles Annual Action Plans 2016 - 2020
Priority Housing Needs/Investment Plan Table (Table 2A)**

Priority Housing Needs (households)	5-Yr. Goal	Yr. 1 Goal	Yr. 2 Goal	Yr. 3 Goal	Yr.4	Yr.5
	<i>Plan/Act</i>	<i>Plan/Act</i>	<i>Plan/Act</i>	<i>Plan/Act</i>		
<i>Renters</i>						
0 - 30 of MFI				64		
31 - 50% of MFI	375	159	125	32	125	125
51 - 80% of MFI						
<i>Owners</i>						
0 - 30 of MFI	15	3	3	6	3	3
31 - 50 of MFI	40	8	8	7	8	8
51 - 80% of MFI	30	6	6	6	6	6
Homeless*						
Individuals	200	40	40	1	40	40
Families	50	10	10	0	10	10
Non-Homeless						
Special Needs						
Elderly	50	10	10	13	10	10
Frail Elderly	25	5	5	5	5	5
Severe Mental Illness	25	5	5	28	5	5
Physical Disability	25	5	5	10	5	5
Developmental Disability	10	2	2	0	2	2
Alcohol or Drug Abuse	15	3	3	0	3	3
HIV/AIDS	0	0	0	0	0	0
Victims of Domestic Violence	190	38	38	0	38	38
<i>Total (Sec. 215 and other)</i>	N/A					
<i>Total Sec. 215</i>						

215 Renter	N/A					
215 Owner	N/A					

* Homeless individuals and families assisted with transitional and permanent housing Note: Section 215 is not funded with the City of St. Charles CDBG. The City of St. Charles uses 15% of its annual allocation to fund public service agencies so that it can meet the priority needs of the community. Funding public services helps to meet priority needs, 3, 4, 5 and 6.

*The home improvement program assists the city to meet needs 2 and 3.

*The Code Enforcement activity assists the city to meet need number 1.

Priority Needs

1. Affordable Decent Safe Rental Housing
2. Affordable Decent Safe Owner Housing
3. Accessible Housing for Special Needs Populations
4. Economic Opportunities-job assistance services for special needs and low income persons
5. Address the Unmet Needs of the Homeless Population in the City of St. Charles, that population includes the Youth, battered women and their children, and single men
6. Homelessness Prevention Services, food, rent, utility and mortgage assistance.

PERFORMANCE MEASUREMENT FRAMEWORK for Priority Housing Needs/Investment Plan Table (Table 2A)

	Outcome1: Availability\ Accessibility	Outcome 2: Affordability	Outcome 3 Sustainability
SL: General Objective Suitable Living Environment	SL-1 Accessibility for the purpose of creating Suitable Living Environments	SL-2 Affordability for the purpose of creating Suitable Living Environments	SL-3 Sustainability for the purpose of creating Suitable Living Environments
DH: General Objective Decent Housing	DH-1 Accessibility for the purpose of providing Decent Housing	DH-2 Affordability for the purpose of provide Decent Housing	DH-3 Sustainability for the purpose of provide Decent Housing
EO: General Objective Economic Opportunity	EO-1 Accessibility for the purpose of creating Economic Opportunities	EO-2 Affordability for the purposes of creating Economic Opportunities	EO-3 Accessibility for the purpose f creating Economic Opportunities.

Priority Housing Activities/Investment Plan Table (Table 2A)

Priority Need	5-Yr. Goal <i>Plan/Act</i>	Yr. 1 Goal Plan/Act	Yr. 2 Goal Plan/Act	Yr. 3 Goal Plan/Act	Yr. 4 Goal Plan/Act	Yr. 5 Goal Plan/Act
CDBG						
Acquisition of existing rental units	0	0	0	0	0	0

City of St. Charles, MO

Production of new rental units	0	0	0	0	0	0
Rehabilitation of existing rental units	0	0	0	0	0	0
Rental assistance	0	15	15	15	17	15
Acquisition of existing owner units	0	0	0	0	0	0
Production of new owner units	0	0	0	0	0	0
Rehabilitation of existing owner units	0	24	21	19	20	24
Homeownership assistance	0	5	7	7	7	12
HOME	0					
Acquisition of existing rental units	0	0	0	0	0	0
Production of new rental units	0	0				
Rehabilitation of existing rental units	0	0				
Rental assistance	0	0				
Acquisition of existing owner units	0	0				
Production of new owner units	0	0				
Rehabilitation of existing owner units	0	0				
Homeownership assistance	0	0				
HOPWA	0	0				
Rental assistance	0	0				
Short term rent/mortgage utility payments	0	0				
Facility based housing development	0	0				
Facility based housing operations	0	0				
Supportive services	0	0				
Other	0	0				

The Table 2B below lists the Priority Community Development Activities from years 2016 - 2020

Priority Community Development Activities (Table 2B)

Priority Need	5-Yr. Goal	Yr. 1 Goal	Yr. 2 Goal	Yr. 3 Goal	Yr.4	Yr.5
	<i>Plan/Act</i>	Plan/Act	Plan/Act	Plan/Act		
Acquisition of Real Property						
Disposition						
Clearance and Demolition						
Clearance of Contaminated Sites						
Code Enforcement	High	High	High	High	High	High
Public Facility (General)						
Senior Centers						
Handicapped Centers						
Homeless Facilities	High	High	High	High	High	High
Youth Centers						
Neighborhood Facilities						
Child Care Centers						
Health Facilities						
Mental Health Facilities						
Parks and/or Recreation Facilities						
Parking Facilities						
Tree Planting						
Fire Stations/Equipment						
Abused/Neglected Children Facilities						
Asbestos Removal						
Non-Residential Historic Preservation						
Other Public Facility Needs						
Infrastructure (General)						
Water/Sewer Improvements						
Street Improvements						

Sidewalks						
Solid Waste Disposal Improvements						
Flood Drainage Improvements						
Other Infrastructure						
Public Services (General)	High	High	High	High	High	High
Senior Services	High	High	High	High	High	High
Handicapped Services	High	High	High	High	High	High
Legal Services						
Youth Services	High	High	High	High	High	High
Child Care Services	High	High	High	High	High	High
Transportation Services	High	High	High	High	High	High
Substance Abuse Services	Med	Med	Med	Med	Med	Med
Employment/Training Services	High	High	High	High	High	High
Health Services	High	High	High	High	High	High
Lead Hazard Screening	High	High	High	High	High	High
Crime Awareness						
Fair Housing Activities	High	High	High	High	High	High
Tenant Landlord Counseling	Med	Med	Med	Med	Med	Med
Other Services						
Economic Development (General)						
C/I Land Acquisition/Disposition						
C/I Infrastructure Development						
C/I Building Acq/Const/Rehab						
Other C/I						
ED Assistance to For-Profit						
ED Technical Assistance						
Micro-enterprise Assistance						

Table 3B Annual Affordable Housing Completions Goals City of St. Charles, MO 5 Year Consolidated Plan 2016 - 2020	Expected Annual Number of Units To Be Completed 2016 - 2020	Actual Annual Number of Units Completed 2017	Resources used during the period			
			CDBG	HOM E	ESG	HOPWA
BENEFICIARY GOALS (Sec. 215 Only)						
Homeless households	50	21	X	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Non-homeless households	30	98 Public Serv & HIP	X	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Special needs households	35	54 Public Services & HIP	X	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Total Sec. 215 Beneficiaries*	85	139	X	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

RENTAL GOALS (Sec. 215 Only)	N/A	N/A				
Acquisition of existing units	N/A	N/A	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>
Production of new units	N/A	N/A	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>
Rehabilitation of existing units	N/A	N/A	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Rental Assistance	N/A	N/A	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>
Total Sec. 215 Affordable Rental	N/A	N/A	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
HOME OWNER GOALS (Sec. 215 Only)						
Acquisition of existing units	0	0	<input type="checkbox"/>	<input type="checkbox"/>		
Production of new units	0	0	<input type="checkbox"/>	<input type="checkbox"/>		
Rehabilitation of existing units	24	25	X	<input type="checkbox"/>		
Homebuyer Assistance	12	7 thru St Lo Co	<input type="checkbox"/>	X		<input type="checkbox"/>
Total Sec. 215 Affordable Owner	36	27	X	X	<input type="checkbox"/>	<input type="checkbox"/>
COMBINED RENTAL AND OWNER GOALS (Sec. 215 Only)	N/A	N/A				
Acquisition of existing units	0	0	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>
Production of new units	0	0	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>
Rehabilitation of existing units	0	0	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Rental Assistance	0	0	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>
Homebuyer Assistance	0	0	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>
Combined Total Sec. 215 Goals*			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
OVERALL HOUSING GOALS (Sec. 215 + Other Affordable Housing)	N/A	N/A	N/A	N/A	N/A	N/A
Annual Rental Housing Goal	0	0	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Annual Owner Housing Goal	0	0	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Total Overall Housing Goal	121	166	X	X	<input type="checkbox"/>	<input type="checkbox"/>

Annual Housing Completion Goals (Table 3B)

PERFORMANCE MEASUREMENT FRAMEWORK for
Annual Affordable Housing Completions Goals

	Outcome 1: Availability\ Accessibility	Outcome 2: Affordability	Outcome 3 Sustainability
SL: General Objective Suitable Living	SL-1	SL-2	SL-3 Sustainability for the purpose of creating

Environment	Accessibility for the purpose of creating Suitable Living Environments	Affordability for the purpose of creating Suitable Living Environments	Suitable Living Environments
DH: General Objective Decent Housing	DH-1 Accessibility for the purpose of providing Decent Housing	DH-2 Affordability for the purpose of provide Decent Housing	DH-3 Sustainability for the purpose of provide Decent Housing
EO: General Objective Economic Opportunity	EO-1 Accessibility for the purpose of creating Economic Opportunities	EO-2 Affordability for the purposes of creating Economic Opportunities	EO-3 Accessibility for the purpose f creating Economic Opportunities.

Programs\Projects\Activities\Outcomes

The HILP outcomes categories for the objectives noted above could be connected to each of the objectives, resulting multiple possible outcomes for the HILP activities. The HILP activities and objects meet all the possible outcomes, however it will focus on:

A. Create Suitable Living Environment

Accessibility for the purpose of creating suitable living environments
 Accessibility for the purpose of providing decent affordable housing

HILP program improves access to affordable loans to improve housing quality.

B. Provide Decent Affordable Housing

Affordability for the purpose of creating suitable living environments
 Affordability for the purpose of providing decent affordable housing
 Affordability for the purpose of creating economic opportunities

HILP program improves access to affordable home repairs, energy efficiency improvements assist with making housing expenses more affordable which provides more monthly disposable incomes. There is positive economic impact for contractors that get the home improvement jobs.

A. Create Economic Opportunities

B. Furthering Fair Housing and equal housing opportunities for all people.

Sustainability for the purpose of creating suitable living environments
 Sustainability for the purpose of providing decent affordable housing
 Sustainability for the purpose of creating economic opportunity

OUTCOME PERFORMANCE MEASUREMENTS TABLES

Transition Table 1C Summary or Specific Housing (Table 1A/1B Continuation sheet)

Table 1C: Summary of Specific Objectives

Table 1C Summary of Specific Housing Objectives

Table 1C Decent Housing with Purpose of Availability/Accessibility (DH-1)
--

Specific Objective		Source of Funds	Year 2016 - 2020	Performance Indicators	Expected Number	Actual Number	Percent Achieved
DH1.1	CDBG Rental Inspection Code Enforcement	CDBG	2013	DH3DH2	125	159	1.2 %
			2014	DH3DH2	125	125	100%
			2015	DH3DH2	125	125	100 %
			2016	DH3DH2	125	125	100 %
			2017	DH3DH2	125	125	100 %
			<i>MULTI-YEAR GOAL</i>				
Decent Housing with Purpose of Affordability (DH-2)							
DH2.1 Dh-1	Home Improvements Loans and Grants	CDBG	2013	DH2 DH3	24	27	+100%
			2014	DH2 DH3	24	21	100.12%
			2015	DH2DH3	10	18	+100%
			2016	DH2DH3	10	20	+100 %
			2017	DH2DH3	25	25	+100%
			<i>MULTI-YEAR GOAL</i>				
Decent Housing with Purpose of Sustainability (DH-3)							
DH3.1	DH-2 Homeownership Assist	HOME	2013	SL1	12	7	58%
			2014	SL1	12	7	58%
			2015	SL1	12	7	58%
			2016	SL1	10	7	70%
			2017	SLI	25	25	100%
			<i>MULTI-YEAR GOAL</i>				
Suitable Living Environment with Purpose of Availability/Accessibility (SL-1)							
SL1.1	EO1 Public Services Special Needs	CDBG	2013	SL2	100	155	1.55%
			2014	SL2	100	97	97%
			2015	SL2	100	99	99%
			2016	SL2	100	99	99%
			2017	SL2	96	96	96%
			<i>MULTI-YEAR GOAL</i>				

Economic Opportunity with Purpose of Availability/Accessibility (EO-1)							
Specific Objective		Source of Funds	Year	Performance Indicators	Expected Number	Actual Number	Percent Achieved
EO1.1	Not funding specific Economic Activities	N/A	2013	0	0	0	0
			2014	0			
			2015	0			
			2016	0			
			2017	0			
			<i>MULTI-YEAR GOAL</i>				0
Economic Opportunity with Purpose of Affordability (EO-2)							

E O 2. 1	Not Applicable		2013	0	0	0	0
			2014	0			
			2015	0			
			2016	0			
			2017	0			
			<i>MULTI-YEAR GOAL</i>				
Economic Opportunity with Purpose of Sustainability (EO-3)							
E O 3. 1	Not Applicable		2013	0	0	0	%
			2014	0			
			2015	0			
			2016	0			
			2017	0			
			<i>MULTI-YEAR GOAL</i>				
Neighborhood Revitalization (NR-1)							
N R1 .1	Not Applicable			0	0	0	%
				0			%
				0			%
				0			%
				0			%
			<i>MULTI-YEAR GOAL</i>				0
Other (O-1)							

OUTCOME PERFORMANCE MEASUREMENTS

Table 1C

Summary of Specific Homeless/Special Needs Objectives

	Specific Objectives	Sources of Funds	Performance Indicators	Expected Number	Actual Number	Outcome/Objective*
	Homeless Objectives					
SL1	Support Homeless	CDBG	Sl-3	65	65	E0-1
E0-1	Homeless Prevention	CDBG	E03	30	43	DH3
	Special Needs Objectives					
E01	Disabled	CDBG	E02	20	54	E03
Sl 1	HILP accessible housing	CDBG	SL2	5	4	Sl3
	Other Objectives					
DH1	Improve housing	CDBG	DH2	10	25	E0-3
DH2	Homeownership Opportunities	HOME NSP	Sl1	12	7	E03
DH1 Sl1	Code Enforcement Rental Inspections	CDBG	DH3	125	125	Sl1

***Outcome/Objective Codes**

	Availability/Accessibility	Affordability	Sustainability
Decent Housing	DH-1	DH-2	DH-3
Suitable Living Environment	SL-1	SL-2	SL-3
Economic Opportunity	EO-1	EO-2	EO-3

OUTCOME PERFORMANCE MEASUREMENTS

Table 2C

Summary of Specific Housing/Community Development Objectives

#	Specific Objectives	Sources of Funds	Performance Indicators	Expected Number	Actual Number 2017	Outcome/Objective *
	Rental Housing					
DH1	Occupancy Inspections	CDBG	DH3	125	125	SL1
	Owner Housing					
DH1	Home Improvement Program	CDBG	DH2	10	25	E03
	Community Development					
E01	E01 Fair Housing Ed	CDBG	E01	2	1	E03
	Infrastructure					
	None					
	Public Facilities					
	None					
	Public Services					
E01		CDBG	E02	100	96	E03
	Economic Development					
	None					
	Neighborhood Revitalization/Other					
	None					

--	--	--	--	--	--	--

***Outcome/Objective Codes**

	Availability/Accessibility	Affordability	Sustainability
Decent Housing	DH-1	DH-2	DH-3
Suitable Living Environment	SL-1	SL-2	SL-3
Economic Opportunity	EO-1	EO-2	EO-3

Table 3A -- Summary of Specific Annual Objectives

	Specific Annual Objectives	Sources of Funds	Performance Indicators	Expected Number	Actual Number	Outcome/Objective *
	DH1 Rental Housing	CDBG	DH3	125	125	SL1
	Code Enforcement Cases	CDBG	DH1	125	125	SL-3
	Owner Housing					
DH1	Home Improvements	CDBG	DH2	10	25	E03
DH2	Home Ownership	HOME	SL1	12	7	E03
	Homeless					
	E01 Public Services Homeless Prev.	CDBG	E02	100	96	DH3
	Special Needs					
	SL1 Public Services Meals on Wheels for disabled	CDBG	E02	15	54	E03
	Accessible Housing Modifications	CDBG	SI2	5	4	SI3
	Community Development					
	E01 Fair Housing Ed Programs	CDBG	E01	2	1	E03
	Infrastructure					
	None					
	Public Facilities					
	None					
	Public Services					
	E01 Support Youth Shelter Services	CDBG	E02	0	0	none

	Economic Development					
	E01 Indirect benefit thru public serv rent utility, mortgage food pantry med serv etc	CDBG	SL2	100	96	SL3
	Neighborhood Revitalization/Other	NONE				

***Outcome/Objective Codes**

	Availability/Accessibility	Affordability	Sustainability
Decent Housing	DH-1	DH-2	DH-3
Suitable Living Environment	SL-1	SL-2	SL-3
Economic Opportunity	EO-1	EO-2	EO-3

Managing the Process

1. Describe actions taken during the last year to ensure compliance with program and comprehensive planning requirements.

Program Year 2 CAPER Managing the Process response:

Consistent with the City’s Citizen Participation Plan to seek public input and solicit proposals for public services and activities that will meet the goals and objectives of the Consolidated Plan. Public hearing notices are published in the local newspapers and hearings are held several times throughout the year. Residents, agencies, non-profit organizations, city citizen advisory boards and commissions, and city staff are all invited to attend and provide comments on the proposed budget, projects and activities. Through the year at various planning stages for Annual Plans and CAPERS, City staff mails invitations to attend the public hearings to minority churches within the city limits and asks that the notices be posted on their bulletin boards.

CDBG Public Services Grant applications are reviewed each year by the City staff, and are approved by an Ordinance passed by the City Council to insure that the proposed projects meet one of the national objectives and meet the strategies, goals and objectives of the program. The City utilizes a standardized reporting format and employs monitoring schedules and conducts staggered visits to insure that all activities and projects meet the priorities, goals, objectives of the Consolidated Plan.

The CAPER in and of itself represents a comparison between expenditures and accomplishments as they relate to the priorities, strategies, goals and objectives.

Administration and monitoring of the CDBG program progressed as efficiently as possible in 2017. During 2017, monthly draws were completed January – December 2017. Timeliness rations were met at the time Alexander Furla, HUD CPD Representative ran the LOCS and IDIS reports November 1, 2017. The City’s rate of expenditure of CDBG funds was within the regulatory requirements.

Citizen Participation

1. Provide a summary of citizen comments.

Response: The 2017 CAPER Public Comment Period was for more than the required 15 days. The public comment period was from March 9, 2017 - March 29, 2017. A Public Hearing was held March 26, 2017. The notice for the hearing was published in city's news paper of record. A public hearing notice was published in the St. Charles Lawyer Media March 9, 2017. Public notices and the Draft CAPER were posted at the Public Housing Authority's Park Ridge Apartments, on the City's Web Site, on public bulletin boards in City Hall, and at the Kathryn Linnemann Library 2323 Elm Street. A draft of the CAPER was posted on the City Web Site, and copies were made available within the Department of Community Development, The St. Charles Public Housing Authority and at the Kathryn Linnemann Library.

Comments were allowed to be received through March 29, 2017. No comments were received during the public comments period. The CAPER was scheduled to be submitted to HUD on March 30, 2017. It was due March 31, which fell on a Saturday.

Program Year 2 CAPER Citizen Participation response: Although funds are available city wide for low – moderate income households the majority of funds are provided in the following US Census Tracts\Blocks 3186.82 and 3186.81. According to the Census, 65% of the population in these census blocks are low income households. The eligible Code Enforcement area within US Census Tracts is drilled down to the Block Groups. For specific details refer to the table on page 36.

Below is a list of other areas outside tract numbers listed above where CDBG Code Enforcement activity occurs in which it is presumed that more than 51% of the population has low to moderate income. Many of the locations are mobile home parks and apartments that allow for Section 8 Housing Choice Vouchers. Maps of the tracks are included in the addendum section of this document.

For example the St. Charles Public Housing Authority, (PHA) Garden Apartment complex is located in block 3103 and has one of the largest minority populations. The PHA has 62 housing units and the majority of residents are African American. This tract is not designated by the Federal Financial Institutions Examination Councils, (FFIEC) as having a majority low – moderate income population of more than 51%. Many of properties or locations listed below are presumed low-moderate income and are inspected by the CDBG Code Enforcement Inspector.

Also, there are several African American families that are home owners living near the Public Housing Authority. In block 3105 there are about seven African American home owners residing on Olive, Lindenwood, Gallaher, and Washington Streets. The home improvement loan programs client pool have come from both these areas. Another minority concentration resides in the Powell Terrance Neighborhood. The largest minority is Hispanic, and then African American. The Church of St. Charles, a CDBG funded public services agency in 2012 assisted 74 Hispanic families and 18 African American families all of which were 30% of the area median income wage earners. Due to minimal staffing at the Church of St. Charles, they were unable to comply with the CDBG reporting requirement therefore have not made applications for CDBG since 2012. The Church of St. Charles continues to serve this population without the use of CDBG Funds.

Race and Ethnicity

Saint Charles is still a mainly non-Hispanic White city, with 87.48% of the population identifying as White. African Americans are the largest racial/ethnic minority in Saint Charles (5.91%), followed by Hispanics (4.19%) and Asians (2.54%). Population has nearly doubled, from 2,097 in year 2000 to 3,889 in 2010. All minority racial groups have increased their

population both numerically and as a percentage of the population (except for American Indians, which increased numerically but declined slightly as a percentage of the population) since the 2000 census. However, the city has diversified significantly since the 2000 and 2010 census. The Hispanic population has more than doubled, from 1187 in 2000 to 2759 in 2010.

US Census Data for Minority Population Changes

	Hispanic	Blacks	American Ind/Alaska Native	Asian	2+ Races
2000	2%	3.5%	0.3%	1.2%	1%
2010	4.19%	5.91%	0.28%	2.54%	1.94%

The diversification has occurred within every populated census tract. In 2000, thirteen of the fifteen populated census tracts were over 90% White. In 2010, eleven of the city’s twenty-three populated census tracts (does not include a Census Tract 3101 with 3 residents or Tract 3112 with 35 residents) were more than 90% White. In 2000, the census tracts with the lowest percentage of Whites was Census Tract 3109, which was 87.3% White. In 2010, eight of the census tracts were less than 87.3% White

Institutional Structure

1. Describe actions taken during the last year to overcome gaps in institutional structures and enhance coordination.

Program Year 2 CAPER Institutional Structure response:

The Department of Community Development (CD) is responsible for the overall development and administration of the Annual Action Plan and CAPER. CD consists of 2 divisions, Planning and Code Enforcement. The administration of the CDBG falls under the Planning Division’s, CDBG Administrator. The CDBG Administrator also provides management and oversight for the Neighborhood Stabilization Program Grant funded by the Missouri Dept. of Economic Dev. The City of St. Charles is a member of the St. Louis County HOME Consortium and the CDBG Administrator also provides oversight for the 1st Time Homebuyer Program or also known as the Homeownership Assistance Program. The Consortium funnels HOME Funds within the City of St. Charles for down payment assistance, home repair, lead abatement projects, to support the development and preservation of affordable housing.

CD works with various departments to coordinate potential projects in the CDBG designated districts, such as Parks and Public Works. The Finance Department assists with accounting practices and drawdown of funds from IDIS to insure compliance for HUD timeliness rule. The City’s Legal Department reviews various contracts, agreements, relative to CDBG related activities as well as the Purchasing Department.

Some of the community based agencies CD works with and relies upon to deliver services to the underserved and/or special needs populations include, (Those underlined are City CDBG & HOME funded sub recipients others, are community partners):

St. Charles County Community Council
FISH Food Pantry
Crider Center for Mental Health

OASIS Food Pantry
St. Joachim & Ann Care Service
 Salvation Army

St. Louis Coalition for Reputable Lending
St. Charles Continuum of Care
Delta Center of Independent Living
Mid East Area Agency on Aging
Matthias Lot Church
St. Charles County Community College
Citizen's With Disabilities Advisory Board
ShowMe Aquatics
First Step Back Home
Our Lady's Inn
Youth In Need Shelter
St. Louis County HOME Consortium
Child Care Resource & Referral Program
St. Vincent DePaul Services
United Infrastructure Inc.
First United Methodist Mission Committee
Habitat for Humanity of St. Charles County
Family Support Services
HUD St. Louis Field Office
Mo EDC
Mo State Historic Preservation Office
City of St. Peters
City of Wentzville
City of Dardene Prairie

St. Charles Hunger Task Force
St. Charles Housing Task Force
St. Charles Housing Authority
JC Senior Center Services
St. Charles County Economic Dev. Corp.
St. Charles Fair Housing Commission
Senior Citizen's Advisory Commission
Volunteers In Medicine
Bridgeway Women's Center Shelter
St. Charles Crisis Nursery
NECAC
Beyond Housing
Catholic Charities
St. Louis Children's Hospital
Equal Housing Opportunity Council
Re-Building Together St. Louis
Web Innovations Recycling Services
Healthy Communities St. Charles County
MERS Goodwill
Mo Division of Family Support Services
St. Charles County Government
City of O'Fallon
City of Lake St. Louis
EDC St. Charles County

CDBG Administrator consults and partners continuously with the agencies listed above to provide stop gap measures for clients with unmet needs. CDBG funded the agencies highlighted above to strengthen program delivery to meet the urgent local needs of those at the extremely low poverty levels. HOME Program funds work with HUD certified non-profit housing counseling agencies that provide homebuyer education and one-one counseling to prepare first time homebuyers for successful homeownership.

A lack of sufficient funding and an increase in the need for public assistance for all these successful programs is the most significant gap in meeting the needs of our St. Charles City Community

Monitoring

1. Describe how and the frequency with which you monitored your activities.
2. Describe the results of your monitoring including any improvements.
3. Self Evaluation
 - a. Describe the effect programs have in solving neighborhood and community problems.
 - b. Describe progress in meeting priority needs and specific objectives and help make community's vision of the future a reality.
 - c. Describe how you provided decent housing and a suitable living environment and expanded economic opportunity principally for low and moderate-income persons.
 - d. Indicate any activities falling behind schedule.
 - e. Describe how activities and strategies made an impact on identified needs.
 - f. Identify indicators that would best describe the results.
 - g. Identify barriers that had a negative impact on fulfilling the strategies and overall vision.

- h. Identify whether major goals are on target and discuss reasons for those that are not on target.
- i. Identify any adjustments or improvements to strategies and activities that might meet your needs more effectively.

1. Describe how and the frequency with which you monitored your activities.

Monitoring response:

Because the City receives more than \$500,000 in Federal funds it conducts a major audit of all programs funded by the state and federal governments known as the A-133 Annual Audit. Community Development Department monitors the eligibility and implementation of all CDBG, and NSP funded programs and activities. Monitoring is for compliance with all the national objectives, federal laws including labor standard review, and compliance for environmental laws, fair housing laws and activities, equal opportunity and Section 3 requirements. The CDGB Administrator reviews all implemented projects for compliance with all applicable federal regulations, policies and procedures. Sub recipient monitoring includes: general programs monitoring occurs daily, monthly, quarterly, semi-annual and annual for reporting purposes.

Technical assistance and agency assessment is provided during review of the grant application at the beginning of each project year. Agencies whose projects are not in compliance or do not meet the goals of the Consolidated Plan are not funded. Staff reviews payment requests throughout the budget year monitoring all projects, non-profits, and individual homeowners participating in the Home Improvement Program.

Each public service agency is site monitored on a staggered periodic basis, and are monitored annually through the application process. All activities and projects costs are paid on a reimbursement basis. A request for reimbursement must have the appropriate documentation attached to verify eligibility for all expenditures. A current report of clientele demographics for the CAPER is also required for explaining the accomplishments of their programs.

When applicable CDBG projects that required Federal Wage Determinations are monitored with respect to compliance with Davis-Bacon regulations. For NSP the City also insures that contractors are not on the HUD debarred list and are eligible to work on CDBG funded activities. The homeowner is responsible for hiring qualified licensed contractors.

All proposed activities and projects are reviewed for compliance with the HUD 24 CFR Part 58 Environmental Review Procedures for Entities Assuming HUD Environmental Responsibilities along with all other related regulations including Section 106 for Historic Preservation. All Environmental Review Files are reviewed and maintained by the CD CDBG Administrator and forwarded to the Mayor for approval as the Certifying Official for the City of St. Charles.

An independent audit firm conducts an annual audit using Government Auditing Standards and OMB Circular A-133. Additional internal audits are performed by the City of St. Charles Finance, Legal, and City Clerk offices. A single audit is an organization-wide audit that includes both the entity's financial statements as well as its federal awards. The City received the 2017 audit report in the summer of 2017, and provided a copy to HUD. There were no significant concerns or findings.

2. Describe the results of your monitoring including any improvements.

Response: The monitoring of the CDBG program has indicated that projects are being carried out and completed in a timely manner.

During the audit, it was determined that the CDBG Code Enforcement Inspector must complete time sheets and track time spent separately for rental inspections, code compliance, Home Improvement Program, and NSP activities. As of that audit her work is tracked daily and time spent on the activities are tracked and drawn specifically for each of the activities mentioned.

3. Self Evaluation

a. Describe the effect programs have in solving neighborhood and community problems.
 Response: The City of St. Charles has done an effective job of reaching out to the public through social service agencies with regard to discovering the needs of its residents. Our local social service agencies evaluate their needs for the community and make this plan a part of their annual grant application. Presentations of each agency’s needs for the community are also given at one or more of the annual Citizen’s Participation Hearings for planning budgets and projects for the Consolidated Annual Action Plan. At this time citizen’s comments and suggestions are considered and implemented when possible. The City has made a great deal of progress in stabilizing neighborhoods by maintaining property values through the use of home improvement loans. Additional residents are allowed to borrow these funds when a home improvement loan client repays the loan. Program Income from loan repayment has helped the City to increase its clients served.

b. Describe progress in meeting priority needs and specific objectives and help make community’s vision of the future a reality.
 Response: Progress is successful. The City of St. Charles continues to upgrade individual homes as well as neighborhoods with the Home Improvement Loan Program. The program has made it possible for elderly homeowners to remain in their homes and have safe and secure living conditions.

c. Describe how you provided decent housing and a suitable living environment and expanded economic opportunity principally for low and moderate-income persons.
 Response: The Home Improvement Loan Program has made it possible for families to provide decent housing for their children, and provide economic benefit through savings in utility costs. Three families were eligible in 2017 and received lead abatement services.

d. Indicate any activities falling behind schedule.
 Response: In 2017 there were no activities that fell behind schedule. Timeliness ratios for the expenditure of funds was well below the required 1.5 times the annual allocation.

e. Describe how activities and strategies made an impact on identified needs.
 Response: The impact of the Home Improvement Loan Program has been substantial for specific households, and also for the neighborhoods where the homes are located. In some cases, the improvement of one house has led to improvements on adjoining properties or the improvement to one house has removed an eyesore in an otherwise well-kept neighborhood.

f. Identify indicators that would best describe the results.

Outcome/Objective Codes	Availability/Accessibility	Affordability	Sustainability
Decent Housing	DH-1	DH-2	DH-3
Suitable Living Environment	SL-1	SL-2	SL-3
Economic Opportunity	EO-1	EO-2	EO-3

Responses: All 2012, 2013, 2014, 2015, 2017 CDBG activities have met the goals and objectives and priority needs for the community to provide access and make available affordable Decent Housing Suitable Living Environments and Economic Opportunity.

g. Identify barriers that had a negative impact on fulfilling the strategies and overall vision.
Response: New Regulatory Requirements implemented by HUD have increased the administrative work load which has the ability to negatively impact completing CDBG activities throughout the year. The new requirements are unfunded mandates and may place a financial burden on the City.

h. Identify whether major goals are on target and discuss reasons for those that are not on target.
Response: In 2013 and 2014 the City received a great deal of loan repayments which created additional administrative burdens and put the city behind in spending the annual allocation. The City should consider making the program a five to ten year forgivable loan as do the other municipalities in the St. Louis Region and throughout the state.

i. Identify any adjustments or improvements to strategies and activities that might meet your needs more effectively.
Response: The City is committed to continuing its Home Improvement Program as it has improved a large percentage of the very old and aging housing stock. Non-profit counseling services are provided to special needs populations that have made a significant positive impact on families in crisis. CD staff worked to advise homeowners on property maintenance issues and offered energy saving tips. The City has worked to increase and strengthen its public and private partnerships to increase services to low – moderate income households.

Lead-based Paint

Describe actions taken during the last year to evaluate and reduce lead-based paint hazards.

Program Year 2 CAPER Lead-based Paint response:

There were 18 home improvement applications. Three homes tested positive for lead, three homes were lead remediated. Lead remediation was completed for the NSP house at 919 N. Fifth. All clients participating in the HILP with homes built prior to 1979 were provided booklets written by the EPA *Protect Your Family From Lead in Your Home*.

HOUSING

Housing Needs

*Please also refer to the Housing Needs Table in the Needs.xls workbook.

1. Describe Actions taken during the last year to foster and maintain affordable housing.

Program Year 2 CAPER Housing Needs response:

Encouraged development of a variety of housing types by:

The City allowed multiple family and single family units of varying densities, and ensured adequate buffering between developments of varying types. The City worked with the development community and allowed mixed use developments that allow services within walking distance of residential area. Major development in progress at Fifth Street and I-70 corridors included Streets of St. Charles, Montclair and New Town.

Assistance to home owners with home rehabilitation projects help to reduce housing maintenance costs and fuel costs to enable lower income persons to better afford their homes.

Support was provided to special needs populations with services designed to help them remain in their homes by providing grants for materials to build wheel chair ramps with use of skilled volunteer labor. Continue efforts to distribute the City of St. Charles Accessibility Guidebook for People with Disabilities. Special needs populations are supported through CDBG Sub recipient grants to public services agencies such as Delta Center for Independent Living, Mid-East area agency on Aging. The support from public services assists with affordable housing because the people assisted are able to keep more of their disposable income for necessary housing expense such as utilities, taxes and insurance.

Member of the St. Louis HOME Consortium provides over \$140,000 for first time homeowner to use for down payment and closing cost to assist with making housing more affordable. Twelve 1st time home buyers were provided access to HOME funds and were able to buy decent safe affordable homes. All persons assisted were 80% - 50% of the area median income.

Partnership with Habitat For Humanity to provide affordable housing for very low income residents. The City provided \$20,000 to Habitat for the remediation of soil contaminants. Habitat expects to raise enough funds to build 4 affordable homes.

Partnership with the St. Charles County Housing Corporation a HOME Funded CHDO Community Housing Dev. Org 501 (c) (3). The CHDO acts as our holding company for the foreclosed homes the City purchases with the NSP Grant. To date the partnership has bought and sold 3 decent hazard free energy efficient affordable homes. 930 St. Charles Avenue was provided to Habitat, in 2010, 1530 N 4th sold in 2011, 1734 Elm Street sold in 2012, 1715 Elm Street sold in the spring of 2017. 919 N. Fifth Street will be listed for sale in the Fall of 2014. At the time this document was produce the home was sold and was due to close February 12, 2014. Included below is the housing assistance goals listed in the 2012 Consolidated Annual Action Plan:

Specific Housing Objectives

Evaluate progress in meeting specific objective of providing affordable housing, including the number of extremely low-income, low-income, and moderate-income renter and owner households comparing actual accomplishments with proposed goals during the reporting period. Response: check here for numbers

The City proposed to provide 100 units of assistance to very low income households through funding public service agencies. There were a total of eight agencies that provided services that primarily prevent people from becoming homeless. The total number of persons assisted was 99, only one household short of meeting the goal. Twenty one households were provided transportation services by Connections To Success with 2015 funds.

Through the CDBG Code Enforcement Activity, one hundred twenty five rental units within low income neighborhoods such as Powell Terrace, Crestview, Creekside, PHA, and Fox Hill were inspected to insure the health and safety of the occupants.

Low income housing subsidized housing is updated and remodeled when needed. The PHA updates a unit each time a family moves out. In 2012, Greater Missouri Builders received funding from the Missouri Housing Development Corporation for rehabilitation of Falcon's Way Townhomes to produce 40 units for families. National Church Residences received MHDC funding to rehab 135 units of elderly housing at Jaycee Fairgrounds Village.¹⁴

1. Describe efforts to address "worst-case" housing needs and housing needs of persons with disabilities.

Response: There were several homes assisted through the Home Improvement Program that were in extremely poor condition and were lacking in basic health and safety facilities. There were homes that the wiring was in such poor condition that it was a fire hazard, which was not only a safety threat for the occupants but also a potential safety threat to the neighboring homes. There were homes without proper heating and or plumbing systems. One home was posted unfit due to extreme hoarding and insect infestation. The code enforcement activities insure that housing units are inspected for basic health and safety prior to rental occupancy. The majority of rental units inspected are in the Powell Terrance Neighborhood. These units were all built from concrete blocks and were meant to be temporary housing for the military during World War II. There have been numerous issues with cracked and leaking foundations causing health concerns about mold growth. The rental occupancy inspection insures that the landlord has to fix any hazards prior to allowing a family to move in. The inspector insures that the landlords properly maintain these properties, because they require a great deal of upkeep.

The City works in partnership with Non-Profits to assist persons with disabilities. There were four disable residents that participated in the home improvement program. Public services agencies provided the greatest number assistance units for this population as noted previously.

Public Housing Strategy

1. Describe actions taken during the last year to improve public housing and resident initiatives.

St. Charles Housing Authority’s Section 8 waiting list opened in 2017. The PHA provided three housing units in 2017. Due to funding issues, they are not currently pulling any names off the waiting list. They are also not absorbing any vouchers for portability. Their public housing waiting is now closed.

Fox Hill Apartments provide low-income housing in the City of St. Charles. All of their units are subsidized, which means that a tenant pays 30 percent of their income towards rent. According to an assistant manager, they currently have a total of 160 units. They have the most demand for 2 BR units. They do not have any fully accessible units, but they do have 6 units (all 3 BR units) that have a basic level of accessibility for persons with disabilities. There are currently 136 households on waiting lists. Fox Hill Apartments: Total Units and Number of Households on Waiting List by Size:

Public Housing Authority Waiting List

Size	Waiting List	Total Units
1 BR	60	56
2 BR	45	64
3 BR	23	32
4 BR	8	8
Total	136	160

This data indicates that there is not enough affordable housing supply in St. Charles City, especially 1 BR Units. As of 2017, there are over 400 households on the waiting list for vouchers. With Section 8 waiting lists closed as well, this affordable housing shortage is clearly an important issue affecting many residents.

There are two subsidized housing developments for seniors in St. Charles City: Jaycee Fairgrounds and Jaycee Terrace, both owned and operated by National Church Residences. Jaycee Fairgrounds has 134 units and is open to those 62 and older as well as persons of any age with a need for an accessible unit. Jaycee Fairgrounds has 12 accessible units and is 25 years old. Jaycee Terrace contains 42 units and was built more recently, in approximately 1996. This development is only open to seniors 62 years and older. Both have a waiting list that is approximately 1 year long. As of March 1, 2017, the waiting lists were both opened and units were filled. The waiting list for accessible units is much longer, and has approximately a 2 year wait.

Supportive Housing: There is also a small 14-unit new HUD-subsidized housing complex that was developed by Crider Mental Health Center with support from HUD's 811 program, Missouri Housing Development Commission and private sources. Constructed in 2005, the development is called Crider Center Choices, Inc. and provides 1-bedroom apartments for people with mental illnesses. One unit is fully accessible and the remaining 13 units are adaptable for persons with disabilities. Residents pay 30% of their income towards the rent. As of March 3, 2017, the waiting list for that facility had 23 names on it and remained open. Staff judged the wait to be about 2 years long. Crider Center staff indicated that they had not encountered any NIMBY ("Not In My Back Yard") attitudes when developing this property, in part because the seller had it on the market for a long time and was motivated to sell, and because the property was not inside a residential neighborhood, but also because Crider Center had the support from the Mayor Patti York. Now Crider Center is working with the Continuum of Care to determine the feasibility of developing a smaller supportive housing "safe haven" on property adjoining Crider Center Choices, which they already own. The length of their waiting list on the current property is indicative to them of the need for more types of supportive and subsidized housing for people with mental illnesses. While there additional supports exist for persons with mental illness, notably, vouchers issued by the Missouri Department of Mental Health, these vouchers cannot generally be used in St. Charles city because the fair market rent is set at \$355 / month, much lower rent than the current market average. In order to utilize the vouchers issued by DMH, Crider Center often has to locate apartments in Warren and Lincoln County where rents are less expensive; the disadvantage is that this pulls their clients away from their social supports, from jobs and from businesses and other amenities that could help increase their independence.¹

There are two Oxford houses in St. Charles which support persons recovering from alcohol and chemical dependencies. Run as a collective by the residents, these provide an additional kind of supportive housing for persons with disabilities. An interview with a resident suggested that the facility had not had encountered NIMBY attitudes in recent years.

LIHTC Properties: The City of St. Charles only has one low income housing tax credit property, Hidden Terrace Townhomes, which has 11 two-bedroom units and 29 three-bedroom units. The development was placed in service in 1995, and LIHTC properties are required to be affordable for a minimum of 30 years.

Senior Housing: Besides the two HUD-subsidized senior facilities (Jaycee Fairgrounds and Jaycee Terrace), there are a number of other senior housing providers in St. Charles City: Mount Carmel Senior Living; Lake St. Charles Retirement; Community Living Incorporated; Parkside Meadows Retirement; Blanchette Place Care Center, Charlevoix Healthcare Center, NHC Healthcare; Unity Health Hospice and St. Charles Senior Center.

Barriers to Affordable Housing

1. Describe actions taken during the last year to eliminate barriers to affordable housing. The North East Community Action Corp (NECAC) serves the needs of approximately 60,000 low-income, elderly, youth, handicapped and disadvantaged residents in a 13-county area each year to assist with the elimination of barriers to affordable housing, as do other non-profit agencies listed above. According to a NECAC spokeswoman, they issue 718 vouchers in St. Charles County. The City of St. Charles accounts for approximately 20 percent of their vouchers. Their waiting list is currently closed; it was last open for 3 days in October 17 - 19, 2017. They have already called about 200 people who signed up, leaving 400 more on the list. They are hoping that it might open again in July 2017.

According to NECAC the biggest problem that their voucher holders face is that people are unable to find units for rent that are fair market value in the City of St. Charles. When these residents cannot find a 1 bedroom unit, they have to go to a 2 bedroom unit, but they are almost always unable find a 2 bedroom unit available in the \$550 - 600 range (their voucher only covers the 1 BR HUD's fair market rent). Therefore, they have to cover the difference by themselves, which is hard because they are on a limited income.

HOME/ American Dream Down Payment Initiative (ADDI)

Program Year 2 CAPER HOME Response: The section is not applicable to the City of St. Charles. The City is a member of the St. Louis HOME Consortium and St. Louis County is the lead member and reports the program accomplishments in their annual CAPER. The City estimated to assist twelve 1st time home buyers in 2017.

1. Assessment of Relationship of HOME Funds to Goals and Objectives
 - a. Evaluate progress made toward meeting goals for providing affordable housing using HOME funds, including the number and types of households served.
2. HOME Match Report Response to questions 2-4 c. not applicable for City of St. Charles CDBG Programs.

Response: Not applicable for the City of St. Charles. St. Louis County is the lead member of the St. Louis HOME Consortium and provides this level of details in their CAPER.

 - a. Use HOME Match Report HUD-40107-A to report on match contributions for the period covered by the Consolidated Plan program year.
3. HOME MBE and WBE Report N/A Reported by St. Louis County
 - a. Use Part III of HUD Form 40107 to report contracts and subcontracts with Minority Business Enterprises (MBEs) and Women's Business Enterprises (WBEs).
4. Assessments N/A Reported by St. Louis County
 - a. Detail results of on-site inspections of rental housing.
 - b. Describe the HOME jurisdiction's affirmative marketing actions.
 - c. Describe outreach to minority and women owned businesses.

Program Year 2 CAPER HOME/ADDI response: N/A Reported by St. Louis County

HOMELESS

Homeless Needs

*Please also refer to the Homeless Needs Table in the Needs.xls workbook.

1. Identify actions taken to address needs of homeless persons.
2. Identify actions to help homeless persons make the transition to permanent housing and independent living.

Program Year 2 CAPER Homeless Needs response:

Grantee Name: City of St. Charles, MO 5 Year Consolidated Plan	Expected Annual Number of Units To Be Completed 2016 - 2020	Actual Annual Number of Units Completed 2017	Resources used during the period			
			CDBG	HOME	ESG	HOPWA
BENEFICIARY GOALS (Sec. 215 Only)				N/A	N/A	N/A
Homeless households	30	21	X	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Non-homeless households	65	78	X	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Special needs households	35	54	X	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Total Sec. 215 Beneficiaries*	130	153	X	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Homeless Services:

Sts. Joachim and Ann Care Service provides homeless prevention services in St. Charles, Lincoln and Warren counties. The agency assists homeless individuals and families to obtain safe shelter, helps families transition out of homelessness, provides emergency rent and mortgage assistance and helps families plan to restore self-reliance. In addition, the agency also provides assistance for emergency home repairs for owner-occupied homes and utility assistance. The St. Charles Ministerial Alliance also provides homeless outreach and emergency assistance.

The Women’s Center provides shelter for victims of domestic violence in St. Charles. Our Ladies Inn provides shelter for teenage mothers. Homeless families and single women with or without children are served by the Salvation Army shelter in O’Fallon. Salvation Army closed the homeless shelter on Zumbahl in 2003 and since that time there are no shelters within St. Charles County that allow single men. In 2011 the City passed an ordinance to allow for a temporary shelter and issued a conditional use permit to Mount Zion Missionary Baptist Church to operate a warming / cooling shelter for homeless men. This shelter was scheduled to open if the temperature was below 25 degrees or above 98 degrees. Mount Zion was unable to raise the funds needed to add a sprinkler system for the building and the facility has never provided temporary shelter services. As for the past twelve years the churches among the St. Charles Ministerial Alliance have provided temporary shelter at various motels within the City.

The CDBG Administrator participates in the HUD Annual Point In Time Homeless Count (PITC) and directs the street crews that check for encampments within the northern section of the

City between N Highway 94, Highway 370 in and around the Salvation Army Soup Kitchen and under the bridges. The crew interviews local 24 hour restaurants in an around areas of known encampments to see if the number of homeless have increased or decreased from the previous years. The crew investigates new encampments that have been reported since the last PITC County. All the encampments are photo documents and a full report of all finds are provided to the Community Council of St. Charles County which convenes the Continuum of Care.

**St. Charles, Lincoln and Warren County Continuum of Care
2017 Homeless Count Findings**

January 27, 2017		January 29, 2015		January 30, 2014	
Sheltered Individuals	73	Sheltered Individuals	100	Sheltered Individuals	218
Sheltered families	12	Sheltered families	444	Sheltered families	408
	2				
Unsheltered Persons in families	43	Unsheltered PIF	328	Unsheltered Persons in families	192
Unsheltered Individuals	71	Unsheltered Individuals	151	Unsheltered Individuals	185
Total Sheltered\Unsheltered	309	Total Sheltered\Unsheltered	1023	Total Sheltered\Unsheltered	1003

- The overall economy is continuing to stabilize and it appears as though the overall homeless numbers have declined. It is unknown when the Salvation Army will receive the funding they need to build their proposed shelter for homeless men in the North End Neighborhood. These statistics and more regarding the household demographics are provided by the Community Council of St. Charles County as they collect the data for HUD through their Continuum of Care and from the Annual Point In Time Homeless County. This data is provided directly to HUD on an annual basis.

Specific Homeless Prevention Elements

1. Identify actions taken to prevent homelessness.

Partnerships with public services agencies and members of the Continuum of Care are our greatest allies in the struggle to assist homeless people. A public awareness campaign was developed by the Vision Leadership Class of 2009. They produced a video that was still being seen by all the municipal governmental leaders in the St. Charles, Lincoln and Warren Counties. See link below:

For more information, see “The Hidden Homeless “<http://www.vimeo.com/10369390>

The Continuum of Care is charged with the reduction of homelessness in our community they collectively assist the homeless in a number of ways. The lead member and facilitator for the Continuum of Care is the Community Council of St. Charles County and Dottie Kastigar is the Homeless Services Coordinator. The Continuum of Care is made up of approximately 30 Non-Profit agencies that work to develop and implement a comprehensive community approach to ending and preventing homelessness. The Continuum responsibilities include annual planning, evaluation, assessment, and partnership development, alignment of services, capital allocation, data collection, reporting and coordination of the HUD Annual Point In Time Homeless Count.

In 2017 the Continuum of Care started a new initiative and formed a committee called Death Prevention for the Homeless. They met with Mayor Sally Faith and explained their goals and objects to provide emergency shelter for the homeless during extreme weather conditions was to prevent the death of homeless people throughout the City and County. Mayor Faith immediately assigned staff from Community Development, Planning and Code Enforcement, CDBG Administrator, including the Fire and Police Departments to help with this initiative. The Fire Dept. committed to providing blankets and cots for the warming shelter. Community Dev. and Fire Dept. agreed to expedite plan review and allow temporary occupancy as long as all safety measures were employed.

Funds in the amount of \$6,620. was provided from 15% of the program income received toward the end of 2017. NECAC was to work with the committee and member agencies, report all sheltered within the HUD HMIS, and to track racial demographics, and other regularly tracked characteristics. Immediately Continuum of Care formed Emergency Weather Response Committee and provide temporary shelter in the form of motel stays during extremely cold temperatures. The committee worked quickly to set up a hot line number and made flyers and provided them in all the know locations where homeless people reside. St. Charles area agencies, churches, and volunteers worked together to decrease weather related deaths among people sleeping on the streets, in cars, or other places not meant for human habitation. Volunteers coordinated an emergency weather response hotline to triage persons on the streets in the St. Charles area for overnight accommodations. When the weather is predicted via weather.com for 63301 to be at or below 20 degrees overnight, the emergency weather response hotline will be activated from 5pm to 8am for the overnight hours. The emergency weather response hotline number is 636-395-0492.

The agencies coalescing together are connecting the homeless with the social services needed to help end the cycle of homelessness. All persons assisted are entered into the HUD HMIS software system utilized by the CoC. During the first round of cold weather approximately 17 homeless people were assisted and of these the majority were single or unmarried men. This is the population of homeless in our community that falls through the cracks as they are not allowed to stay at the Salvation Army Homeless Shelter in O'Fallon, Missouri. During the 2nd round of cold weather it was reported that 15 new homeless or not previously assisted were sheltered.

Program Year 2 CAPER Specific Housing Prevention Elements response:

Sts. Joachim & Ann Care Services\Catholic Services

The purpose of the program to prevent homelessness. This program concerns those whose homelessness would originate from economic forces beyond their control. They have no prior history of homelessness. They are just a paycheck away from homelessness. Examples are those who may be evicted or foreclosed upon and those who may have to leave their homes because of lack of heat, electricity, or water. The temporary services provided by the program includes utility, mortgage, and rental assistance to persons and families of very low income. Also provided is intensive case management services to assist persons in overcoming barriers that may cause their clients homeless/near homeless conditions. This agency receives Rapid Re-housing funds from the State Division of Family Services. It was reported by Dir. Miriam Mahan, that they were awarded funds that will help provide the social services needed to address the psychological needs of homeless people, and to help them obtain assisted supportive housing in 2017. According to Miriam they will be able to hire trained professional to seek out the homeless community and bring them in for help.

Emergency Shelter Grants (ESG)

Program Year 2 CAPER ESG response: 2017 CAPER Response: This section is not applicable in this case as the City is not a recipient for the ESG Emergency Shelter Grant. The ESG Section Deleted for space saving purposes.

COMMUNITY DEVELOPMENT

Community Development

*Please also refer to the Community Development Table in the Needs.xls workbook.

1. Assessment of Relationship of CDBG Funds to Goals and Objectives
 - a. Assess use of CDBG funds in relation to the priorities, needs, goals, and specific objectives in the Consolidated Plan, particularly the highest priority activities.
 - b. Evaluate progress made toward meeting goals for providing affordable housing using CDBG funds, including the number and types of households served.
 - c. Indicate the extent to which CDBG funds were used for activities that benefited extremely low-income, low-income, and moderate-income persons.

Response: a. Assess use of CDBG funds in relation to the priorities, needs etc.:

Priority Needs

1. Affordable Decent Safe Rental Housing
2. Affordable Decent Safe Owner Housing
3. Accessible Housing for Special Needs Populations
4. Economic Opportunities-job assistance services for special needs and low income persons

Seven families were income qualified to receive loans, and Six households received grants in 2017. The majority of them are still working on completing their home improvement projects and will most likely complete them in 2017. A total of eighteen Home Improvement Clients, funded in prior years completed there projects. Six households had income of 30% AMI, seven had 50% AMI, and six had 80% AMI. Of these households three were female headed, seven were elderly and four were disabled. Code Enforcement provided 125 decent safe rental housing units. Public services activities address the economic opportunities and provided transportation programs for seniors and the disabled, other provided workforce transpiration, and homeless prevention .

- d. Changes in Program Objectives. Response there were no changes in 2017 for any of the programs or activities objectives, however the IDIS System allowed for program activity in the following US Census Tracts and blocks:

2017 CDBG Code Enforcement Areas

Census Tract Number	Block Groups Number
3102.02	2
3103.02	3
3105.01	All Blocks 1-10
3105.02	All Blocks 1-10
3107.00	1,2
3109.01	All Blocks 1-10
3109.03	1
3110.03	1
3110.04	3

3124.00

All Blocks 1-10

- e. Identify the nature of and the reasons for any changes in program objectives and how the jurisdiction would change its program as a result of its experiences.

Response: There were no changes.

2. Assessment of Efforts in Carrying Out Planned Actions

- a. Indicate how grantee pursued all resources indicated in the Consolidated Plan.

Response: The city sought funds to pair with the Home Improvement Program from the Mo. Dept of Natural Resources, Div of Energy, Low Income Weatherization Program. 42 households with incomes of 50-30% AMI were assisted with weatherization measures that would save each household 30% monthly on utility costs.

- b. Indicate how grantee provided certifications of consistency in a fair and impartial manner.

b. Response: The CDBG Administrator insures that all the laws and authorities under the National Environmental Protection Act, and the Fair Housing Act, Dept. of Justice and the CPMP Non-State Grantee Certifications. are followed accordingly. Mayor Sally A. Faith is the Certifying Official for the City's CDBG Program. She certifies the Environmental Review, signs the application and request for funds, and certifies consistencies with the CDBG Annual Action Plans for the Public Housing Authority and other agencies that may apply for MHDC funds. The Mayor appoints the members of the Housing Authority Board, who oversee the operations of the Housing Authority, and the Fair Housing Commission, Human Relations Commission, Citizen's With Disabilities Advisory Board, and the Senior Citizen's Advisory Board. The City adopted a Title VI Plan and notices are posted on all public bulletin boards within City Hall.

- c. Indicate how grantee did not hinder Consolidated Plan implementation by action or willful inaction.

Response: The City of St. Charles did not act in any manner that hindered the Consolidated Plan implementation by any action or willful inaction. All those that came forward in the home improvement program were income eligible and were provided assistance. I know of no public services agencies that denied anyone any services that were funded by the City.

3. For Funds Not Used for National Objectives

- a. Indicate how use of CDBG funds did not meet national objectives.

2017 CAPER Response. All funds used met at least one of the National Objectives which provided services to low – moderate income households.

- b. Indicate how you did not comply with overall benefit certification. b. Response: The City complied with overall benefit certifications.

4. Anti-displacement and Relocation – for activities that involve acquisition, rehabilitation or demolition of occupied real property

- a. Describe steps actually taken to minimize the amount of displacement resulting from the CDBG-assisted activities.
- b. Describe steps taken to identify households, businesses, farms or nonprofit organizations who occupied properties subject to the Uniform Relocation Act or Section 104(d) of the Housing and Community Development Act of 1974, as amended, and whether or not they were displaced, and the nature of their needs and preferences.
- c. Describe steps taken to ensure the timely issuance of information notices to displaced households, businesses, farms, or nonprofit organizations.

Response Question 4 a-c. Anti-displacement and Relocation: Not applicable. There were no activities conducted or any CDBG funds used that caused any household to be displaced.

5. Low/Mod Job Activities – for economic development activities undertaken where jobs were made available but not taken by low- or moderate-income persons
 - a. Describe actions taken by grantee and businesses to ensure first consideration was or will be given to low/mod persons.
 - b. List by job title of all the permanent jobs created/retained and those that were made available to low/mod persons.
 - c. If any of jobs claimed as being available to low/mod persons require special skill, work experience, or education, provide a description of steps being taken or that will be taken to provide such skills, experience, or education.

Response Question 5 a-c Low/Mod Job Activities – for economic dev. activities. Not applicable. There were no activities funded that provided specific jobs or were specifically designed for economic development.

6. Low/Mod Limited Clientele Activities – for activities not falling within one of the categories of presumed limited clientele low and moderate income benefit
 - a. Describe how the nature, location, or other information demonstrates the activities benefit a limited clientele at least 51% of whom are low- and moderate-income.

Response Question 6 a Low/Mod Limited Clientele Activities: The Code Enforcement Activity is concentrated in the following US Census Tracts and Blocks which according to the US HUD Community Development Systems Integrated Disbursement & Information System (IDIS) are low – mod areas where at least 51% of the residents are low – moderate income: Refer to table on page 35 for the specific Census Tract Numbers and Block Group Numbers.

- 7 a. Program income received.

Response: Funds from loan payoff were received totaling \$44, 207.15. That exact amount was then placed in service and used to fund additional home improvement clients, 20% of the funds were used to fund program administration, and 15% of the funds were used to provide public services for the homeless.

- 7b Detail the amount repaid on each float-funded activity.

Response: Not applicable. The city does not provide float-funded activities.

- 7c. Detail all other loan repayments broken down by the categories of housing rehabilitation, economic development, or other.

Response: All funds were used for the activities noted above.

- 7c Detail the amount of income received from the sale of property by parcel.

Response: Not applicable the answer is the same for 8 All funds were used as stated.

8. List the principal balance for each float-funded activity outstanding as of the end of the reporting period and the date(s) by which the funds are expected to be received.

Response: The City does not provide float funding for activities. All loans are zero percent deferred to low/mod income resident occupant home owners. These loans are due at the time the property is sold, or upon death, title transfer or conveyance.

- 9 List the total number of other loans outstanding and the principal balance owed as of the end of the reporting period.

Response: There are no other loans outstanding.

- 10 List separately the total number of outstanding loans that are deferred or forgivable, the principal balance owed as of the end of the reporting period, and the terms of the deferral or

forgiveness.

Response: Eighteen deferred interest loans were approved at an average of 10,000 each in 2017. These loans are due upon the sale of the properties. Not everyone that was approved for a loan in 2017 completed their projects, and the numbers below represent expenditures for some clients that were approved in prior years but completed their projects in 2017. A total of twelve Home Improvement Loan households completed projects in 2017. Six grants were provided to very low income households to repair mobile homes and provide assessable home modifications. A total of eighteen homes were improved with CDBG funds in 2017.

10a. Detail the total number and amount of loans made with CDBG funds that have gone into default and for which the balance was forgiven or written off during the reporting period.

Response: There was approximately four clients that had accessed the home improvement program in prior years whose mortgages went into default and foreclosure in 2017. Because the City was in a junior position in line on the lien that city loan was wiped off the title when the property became bank owned. The City has never foreclosed on a home improvement loan. The City has in the past released liens early for extenuating circumstances. In 2017 a loan was forgiven due to the death of the client who died in a car accident 10 years prior or in 2005. The mother of the deceased acting as beneficiary transferred the title to the home to the son of the deceased. No title search was conducted at the time of transfer so no one knew about the City's lien. The City was never aware that the client had died. The lien was discovered when the son of the deceased attempted to refinance his home. The City makes no attempts to collect debts. Or does not mail annual statements to clients. The City Attorney researched the Missouri Statutes of Limitations regarding collection or non-collection of debts. He determined that in the State of Missouri there is a ten year limitation on the collection of debts; therefore he agreed that they should release the lien to quiet the title.

10b Provide a List of the parcels of property owned by the grantee or its sub recipients that have been acquired or improved using CDBG funds and that are available for sale as of the end of the reporting period.

Response: The city does not use the CDBG funds for activities to acquire and approve properties to sell, nor has it funded any sub-recipients to conduct such activities. The intention of the Home Improvement Program is to assist owner occupant with needed repairs so they can continue to reside in their homes. The loan program is offered at zero percent interest to make such repairs affordable. The City acquired 1715 Elm Street with NSP grant funds provided by the Missouri Dept. Of Economic Dev. The home at 1715 Elm Street sold in 2017 to a middle income (120% AMI) single female. The program purchased 919 N Fifth Street in 2013, completed the rehab work and the home sold to a family just above 80% Area Median Income. In 2017.

11. Lump sum agreements.

- a. Provide the name of the financial institution.
- b. Provide the date the funds were deposited.
- c. Provide the date the use of funds commenced.
- d. Provide the percentage of funds disbursed within 180 days of deposit in the institution.

Response to Lump sum agreements. The City does not provide funds in this manner and does not provide lump sum agreements.

12. Housing Rehabilitation – for each type of rehabilitation program for which projects/units were reported as completed during the program year

- e. Identify the type of program and number of projects/units completed for each program.

- f. Provide the total CDBG funds involved in the program.
- g. Detail other public and private funds involved in the project.

Response 12 e, f g:

The City spent a total of 261,473.80 from CDBG funds for home improvements and also spent approximately \$25,737.69. of the program income was received from loan payoffs and was also spent for additional home improvement loans and grants. In 2017 a total of \$287,211.49. was spent on home improvement from grant allocations received in 2013 and 2014.

Approximately \$80,000 was obligated for home loans in 2017 for eight housing units. Over the past few years NSP funds were used to assist one low, one moderate and one middle income household achieve homeownership of a completely rehabbed energy efficient healthy home. No other public or city revenue generated funds were provided as match for these programs.

Listed below is a summary of the racial characteristics' of these families and their percentages of area median incomes.

**Annual Summary Form: Performance Measures,
Data Statistics & Demographics Form
January 1, 2017 – December 31, 2017**

Home Improvement Loan Program 2017 Completed Loan Projects (13) Completed (7) Grant Projects. A total of 20 homes were improved.

Address	Gender\or Couple	Household Type	Race	Household Income Percentages 80%, 50% or 30%
204 N. 6 th	Female	Head of Houshold	W	80
2002 Monroe	Couple	Married	W	30
3353 Cottonwood	Couple	Married	W	80
1401 N 2 nd	Female	Head	W	30
1522 Shadow Ln	Couple	Married	W	30
4503 Sherman Park	Female	Single	W	80
1626 Rosewall	Female	Elderly	B	30
1019 S 4 th	Couple	Married Disabled	W	50
1817 West Clark	Female	Single	W	50
1915 McNair	Female	Elderly	W	50
810 St. Charles Ave	Mail	Elderly Disabled	W	50
1519 Harvard Way	Couple	Married	W	50
1045 Perry	Female	Elderly Single	W	30
2001 N 5 th Habitat	Female	Single Headed	w	50
2003 N Fifth Habitat	Female	Single Headed	W	50
221 Diekamp Dr	Married	Disabled	W	50

Small Grants

Address	Gender\or Couple	Household Type	Race	Household Income Percentages
---------	------------------	----------------	------	------------------------------

				80%, 50% or 30%
31 N Overbrook	Female	Single	W	30
3740 Baden	Female	Head of House Disabled	W	30
2501 Nettie	Female	Disabled	W	30
10 Arrohead Cr.	Female	Single Disabled	W	50
68 Brookside	Female	Single Disabled	W	30
306 S Duchesne	Female	Single Elderly Disabled	W	50
2502 Sibley	Male	Male headed household	W	30
40 Vista	Female	Disabled	W	30
103 S Overbrook	Female	Elderly	W	30

For this section the Disabled Household is counted separately . The total number of household types assisted for the reimbursement period in the box correlating to the household type below. Note 21 people were assisted. There were a total of 6 disabled people benefiting from the programs. There were 3 adult disabled households, 1 of which was and elderly male. There were 3 single female headed households with disabled children, 2 of which were elderly women caring for dependents.

Female Headed	Elderly Female Headed	Elderly Female Headed Disabled	Elderly Household	Total Disabled Household	Married Couple	Single Female	Single Male
5	0	0	5	8	4	17	1

Races & Abbreviations: Native American\NA, Hispanic\H, Black\African American\BAA, Asian\A, White\W, Pacific Islander\PI, Other Multi-Racial\OM H L

NA	H	BAA	A	W	PI	OM
0	0	1	0	24	0	0

Totals by % of area median incomes (AMI) of households serviced. See attached table Total Assisted (18)

Low Income Limits 80% AMI	Very Low Income Limits 50% AMI	Extremely Low Income Limits 30% AMI
3	10	12

Below are the 2017 HUD Income limits for the St. Charles Region. The area median income is \$70,300. The percentages below are based on the area median income (AMI). Even though the table below includes 60% and 65% AMI, HUD only requires tracking 30% AMI which is extremely low income, 50% AMI very low income, and 80% low income limits.

2017 INCOME LIMITS (First Time Home Buyers, and Home Improvement Clients must be within these ranges or less to qualify)

Income %	FAMILY SIZE							
	1	2	3	4	5	6	7	8
30%	\$14,800	\$16,900	\$19,000	\$21,100	\$22,800	\$24,500	\$26,200	\$27,900
50%	\$24,650	\$28,150	\$31,650	\$35,150	\$38,000	\$40,800	\$43,600	\$46,400
60%	\$29,580	\$33,780	\$37,980	\$42,180	\$45,600	\$48,960	\$52,320	\$55,680
65%	\$32,045	\$36,595	\$41,145	\$45,695	\$49,400	\$53,040	\$56,680	\$60,320
80%	\$39,400	\$45,000	\$50,650	\$56,250	\$60,750	\$65,250	\$69,750	\$74,250

13. Neighborhood Revitalization Strategies – for grantees that have HUD-approved neighborhood revitalization strategies.

a. Describe progress against benchmarks for the program year. For grantees with Federally-designated EZs or ECs that received HUD approval for a neighborhood revitalization strategy, reports that are required as part of the EZ/EC process shall suffice for purposes of reporting progress.

Response. Not applicable, the City does not have HUD approved neighborhood revitalization strategies.

2017 CAPER Community Development response Question 13: Not applicable. The City does not operate under a HUD approved Neighborhood Revitalization Strategy.

Antipoverty Strategy

1. Describe actions taken during the last year to reduce the number of persons living below the poverty level.

Response: The CDBG Administrator consults and partners continuously with approximately 40 agencies listed on page 24 to provide stop gap measures for clients with unmet needs. CDBG funded the agencies highlighted to strengthen program delivery and to meet the urgent local needs of those at extremely low poverty levels. HOME Program funds work with HUD certified non-profit housing counseling agencies that provide homebuyer education and one-one counseling to prepare first time homebuyers for successful homeownership.

A lack of sufficient funding for all these successful programs is the most significant gap in meeting the needs of the St. Charles City Community.

NON-HOMELESS SPECIAL NEEDS

Non-homeless Special Needs

*Please also refer to the Non-homeless Special Needs Table in the Needs.xls workbook.

1. Identify actions taken to address special needs of persons that are not homeless but require supportive housing, (including persons with HIV/AIDS and their families).

Response:

Elderly persons may need housing assistance of two kinds: financial and supportive. The City contracts with Mid East Area Agency on Aging, (MEAAA) and Delta Center for Independent Living to provide supportive services to the elderly and disabled. MEAAA supplies meals both in people's homes and in the congregate eating facility at the Odell Senior Center. Delta Center and MEAAA coordinates case management for low-income frail or ill elderly to prevent at-risk status and homelessness due to lack of self-preservation skills.

The City's contracts with the Crider Center for Mental Health who provides community support, housing support, employment services and psychosocial rehabilitation for persons who have a serious mental illness and who are low-income.

Persons who are developmentally disabled and physically disabled need case management and life skills training. The contract with Delta Center helps to meet these needs. Delta Center for Independent Living has provided limited transportation to and from doctors and grocery stores for persons with disabilities. In 2012 the project was expanded to provide funds for a workforce transportation program, for low income people with disabilities.

It is also a goal to increase the number of handicapped accessible housing units in the City by five units each year of the Consolidated Plan. In 2017 four households were provided home assessable modifications.

The city relies on its partnerships and coalitions with the Public Housing Authority and of the Continuum of Care members to address the Non-Homeless and Special needs populations as stated elsewhere in this document. Also the Home Improvement program addresses special needs populations and is available to assist any income qualified household with accessible home modifications when ever needed. The Continuum of Care services includes prevention, outreach, supportive services, emergency shelter, transitional housing and permanent housing.

The following funding streams were available in St. Charles County to assist special needs populations:

McKinney-Vento Homeless Assistance Act funds received by Bridgeway Counseling Services, and Youth in Need provide direct services to homeless, women, their children and for boys and girls in the St. Charles City community.

HUD Funded Public Housing Authority, has 62 on-site Public Housing units and 12 scattered site units in the City of St. Charles. The PHA plan also notes the need for a variety of housing options in the Section 8 tenant based rental assistance program.

Temporary Assistance for Needy Families TANF. The Continuum of Care Worked diligently with the continuum and other municipal jurisdictions to identify and attempt to develop programs that meet the unmet needs of the community. City staff continue to participate with the Continuum of Care and volunteer for the Point In Time Homeless Count. The City has assisted the Continuum in obtaining funding under Missouri ARRA TANF ECF, Temporary Assistance for Needy Families Emergency Care Funds McKinney-Vento Homeless Assistance Act from Dept. of Social Services. It is estimated that St. Charles County may receive for the 1st time \$800,000 in TANF funds.

The North East Community Action Corp (NECAC) serves the needs of approximately 60,000 low-income, elderly, youth, handicapped and disadvantaged residents in a 12-county area each year. According to a spokeswoman, they issue 718 vouchers in St. Charles County. The City of St. Charles accounts for approximately 20 percent of their HUD funded vouchers.

Below is Table 1B which represents those served within special needs subpopulations. The Households listed in the table below were provided direct assistance through the CDBG Public Services Cap which was intended to bridge the gap of the unmet needs of this population. Persons in the last four categories, such as, persons with alcohol or drug addictions, persons with HIV/AIDS, victims of domestic violence, and other special needs subpoulations, may have been served indirectly or directly through one of the 8 CDBG funded Public Services. It is unknown at this time the number of those that may have been served. The City relies on public service agencies that provide these services and receives funds directly from the county, state or other federal agencies such as Bridgeway Behavior Health, Youth In Need, Developmental Resources Board, Volunteers in Medicine, and Crider Health Center.

Table 1B Special Needs (Non-Homeless) Populations

SPECIAL NEEDS SUBPOPULATIONS	Priority Need Level High, Medium, Low, No Such Need	Unmet Need	Dollars to Address unmet Need	Milti-Year Goals	Annual Goals
Elderly	High	5	\$6,092	5	5
Frail Elderly	High	10	\$6,092	10	10
Severe Mental Illness	High	28	\$6,092	18	28
Developmentally Disabled	Low	0	0	0	0
Physically Disabled	High	5	\$6,092	5	5
Person w/Alcohol/Other Drug Addictions	No Such Need	0	0	0	0
Person w/HIV/AIDS	No Such Need	0	0	0	0
Victims of Domestic Violence	No Such Need	0	0	0	0
Other	No Such Need	0	0	0	0

Specific HOPWA Objectives

2017 CAPER Response Not Applicable: The City of St. Charles is not a HOPWA recipient. The Specific HOPWAP Objectives questions section were deleted to conserve space in this document.

OTHER NARRATIVE

Include any CAPER information that was not covered by narratives in any other section.

Program Year 2 CAPER Other Narrative response:

Affirmatively Furthering Fair Housing

Under the terms of their contracts between each jurisdiction and HUD, CDBG entitlement jurisdictions are required to:

- Use CDBG funds to “affirmatively further fair housing.”

In general, this refers to enforcement or educational activities. HUD allows the jurisdiction to direct CDBG dollars to its own activities or to fund activities that non-governmental organizations coordinate on the jurisdiction’s behalf.

- Conduct an Analysis of Impediments (AI) every 3 to 5 years. The last AI was completed in 2012. The next update to the AI will be scheduled in conjunction with that of St. Louis Home County Consortium for a more regional approach.

State or federal laws do not, however, require jurisdictions to have a system of investigation and enforcement, including remedies for cases between private parties regarding fair housing cases, unless they apply for, and are awarded, substantial equivalency certification. In fact, municipal governments are generally not authorized to create a cause of action as between individuals for fair housing violations, under the Missouri Supreme Court case of *Yellow Freight Systems, Inc. Mayor’s Commission on Human Rights*, 791 S.W.2d 382 (1990). This power is reserved by the State, which has created a cause of action through the Missouri Human Rights Act.

The City of St. Charles Affirmatively Furthers Fair Housing through Use of Focus Groups

The St. Charles Fair Housing Commission is a group of seven citizens who have volunteered to serve on this committee; they meet on a quarterly basis and serve in an advisory capacity to the Mayor and City Council. The purpose of the Commission is to identify and resolve fair housing issues in the city and encourage city decision makers to promote fair housing. The Commission promotes two fair housing education events per year. They also promote affordable housing and may at times sponsor a homeownership assistance seminar for first time home buyers.

Over the past year the Commission discussed many of the following issues and worked to help the City to address the concerns listed in the AI, which are mainly the lack of affordable housing: As seen in census data previously stated, housing in many areas of St. Charles City is more than 15 years old. Over time these housing structures have faced wear and tear that will inevitably force residents to make necessary repairs. The St. Charles City Fair Housing Commission realizes that the city not only needs to build more affordable housing, but it also must ensure that the current supply of affordable housing is in decent condition. The Commission also cited the lack of occupancy standards and the need for more education as factors contributing to affordability issues in the city. One person on the Commission said, “There are a fair number of mom and pop landlords who are not educated.” On the flip side, members of the Commission also said that sometimes the tenants do not “understand the rules.” In general, they believed that landlords and tenants need to receive better education on occupancy standards and inspection standards. They said that often times there are no occupancy standards or the landlord is unsure of the rules of occupancy. Finally, members of the St. Charles Housing Commission said that the city simply does not have enough land to build more affordable housing units. They discussed an incident involving a group of seniors who wanted land to build affordable housing, but could not find affordable land with easy access to specific facilities such as grocery stores. In general, the Commission believes that the lack of affordable housing and these aforementioned issues associated with the current affordable housing supply are major fair housing issues in St. Charles City. In fact, one member of the Commission even said, “We don’t have affordable housing anymore.”

The Commission also discussed the issue of accessible housing in St. Charles City. They said that they believed that 40 percent of houses have only one step to the door, but the majority of housing units in the city still need kitchen and bath modifications to make them fully accessible. The Commission also said that the population of the city is aging, which supports census data that indicated that the median age of the city's population is dramatically increasing. They said that one of the biggest problems for this new population is transportation from their housing unit to doctors' offices, grocery stores, etc. Moreover, they acknowledged that "with newer houses, people are going to universal design."

In general, the St. Charles City Fair Housing Commission felt that the status of fair housing in the city was generally good. They said, "We rate 'ok' out here." However, they did acknowledge that city must improve in the areas of affordable housing and accessible housing.

The City of St. Charles works with the Public Housing Authority, Metropolitan St. Louis Equal Housing Opportunity Council, and HUD to promote the enforcement of fair housing through publications, training sessions and support from the Housing Task Force, Family Self Sufficiency Advisory Board, the City of St. Charles Citizen's With Disabilities Advisory Board, Senior Citizen's Advisory Board, Continuum of Care, and the St. Charles Fair Housing Commission to remedy discrimination in housing.

Analysis to impediments, to Fair Housing Study, AI
HUD requires CDBG Entitlement communities to conduct and/or update its AI every 3 to 5 years or consistent with the terms of the community's Consolidated Plans.
St. Charles updated its AI in 2005, 2008, and then lately in 2012. The AI report was produced by the Metropolitan St. Louis Equal Housing Opportunity Council and submitted to the city in September 2012. Any errors or omissions are the responsibility of EHOC.

FAIR HOUSING PROFILE

A. Fair Housing Complaints Filed

In the past Four years (2016 - 2020), the Metropolitan St. Louis Equal Housing Opportunity Council received six fair housing complaints from the City of St. Charles.

Review of Housing Discrimination Testing

As part of our analysis of impediments to fair housing in Saint Charles, the Metropolitan St. Louis Equal Housing Opportunity Council conducted eleven paired tests in the rental market for discrimination. We chose to focus on the rental market because prior testing in the sales market had not uncovered discrimination, and because the fair housing complaints filed in Saint Charles were all in the rental market.

Tests were conducted on the basis of disability, race, familial status and national origin. Of the eleven paired tests completed, three tests indicated a difference of treatment, two of these were based on disability and one on familial status. The two disability tests with findings indicated that a housing provider would not grant a reasonable accommodation for a service animal, and the familial status test indicated that a housing provider would not rent a one bedroom unit to an adult with a child, while the same housing provider would rent the unit to two adults.

Two other tests indicated a possible difference in treatment, but results were inconclusive. These were tests based on national origin and disability. On the national

origin test, the protected class tester was shown one available unit while the no protected class tester was shown two available units. However, the two testers met with different agents.

During the disability test, the housing provider asked about the type of disability that the prospective applicant had. The Fair Housing Act limits questions about disability, except to determine whether a reasonable accommodation is needed or to qualify a person for an accessible unit or a type of housing set aside for persons with disabilities.

In this case, the housing provider asked for the information about the disability after having been asked for a reasonable accommodation. When an individual asks for a reasonable accommodation under the act, the housing provider can make sure that the individual qualifies, but finding out (1) whether the individual has a disability; and (2) whether the accommodation requested is necessary because of the person’s disability. The housing provider may request proof from a qualified medical professional to verify that the accommodation is necessary. The housing provider may have been attempting to verify whether the accommodation was necessary, but went beyond the bounds of the FHA by inquiring as to the type of disability that the individual had.

Two complaints were based on disability and race; one was based on familial status, one on race and national origin, and the final was based on “other”. All complaints were in the rental market.

A national origin complaint that EHOc filed with the Missouri Commission on Human Rights resulted in a “cause” finding against a landlord. EHOc’s testing indicated that The landlord inquired about residency status to a Hispanic tester, but not to a White non-Hispanic tester. She showed the unit to the White tester, but did not show up for the appointment with the Hispanic tester. The case was featured on KMOV Channel 4 news. During the interview, the housing provider maintained that she does not discriminate, even though she admitted she requested information about whether the Hispanic tester was “legal” or not, and did not ask these questions of the White tester.

As a remedy EHOc provided Fair Housing Training to the landlords.

HUD collects data on fair housing cases filed by county, so it not possible with this data to find out how many complaints dealt with fair housing issues in the City of Saint Charles. Fair Housing Complaints in St. Charles County Processed by HUD

Fair Housing Complaints

	Total Complaints	Disability	Race	Familial Status	Gender	National Origin	Other
2014	16	8	6	2	1	2	0
2015	7	2	5	0	1	1	0
2016	8	2	3	2	0	0	0
2017	9	3	4	3	1	2	0
Total	40	15	18	7	3	5	0

Zoning Analysis\Accessibility

Saint Charles has adopted the 2017 International Building Code which is a safe harbor for

the Fair Housing Act accessibility requirements.

The city does not have any type of “visitability” ordinance that would require accessible design in single family and 2 – 4 family homes. However, projects funded by the Missouri Housing Development Commission that are single family and for elderly are required to abide by universal design guidelines set out by the commission.

Occupancy Restrictions

Saint Charles defines “family” as “One or more persons who are related by blood, marriage, or adoption, living together and occupying a single housekeeping unit with single kitchen facilities, or a group of persons living together and occupying a single housekeeping unit with single kitchen facilities, of which group no person shall be unrelated to more than two persons in the group, or any group of people related by blood, marriage or adoption and one other unrelated person.

Although this definition is more expansive than what exists in the majority of municipalities in neighboring St. Louis County, one can imagine non-traditional families that would fall afoul of this definition, such as unmarried couples with three or more children, or unmarried couples caring both for children and elderly parents. Because unmarried heterosexual couples have the ability to marry, same sex couples are more seriously affected than opposite sex unmarried couples. If both members of the couple have at least one child (or act as a caregiver for an elderly parent), then the household must be limited to four persons in order to comply with the municipal ordinance. There would be no limits (except by space restrictions) on traditional married couples.

Although sexual orientation is not a protected class under current federal, state or local fair housing law in Saint Charles, it is possible that a claim could be filed for discrimination based either on familial status or on gender\sex.

Another development that may impact the city’s liability in maintaining a restrictive definition of “family” is the current HUD policy regarding LGBT (lesbian, gay, bisexual and transgender) rights in housing. HUD has issued guidance to HUD staff and Substantially equivalent fair housing assistance programs those complaints of sexual orientation discrimination are to be evaluated for possible jurisdiction under the Fair Housing Act. Investigators and intake staff should evaluate whether an individual or couple may have been treated differently due to other protected classes under the Fair Housing Act, such as protections against discrimination based on gender (sex), disability, or perhaps religion. In the case of Saint Charles, a same sex couple may argue that the ordinance has a disparate impact on same gender couples as compared to opposite gender couples, which amounts to sex discrimination.

Group Homes

Saint Charles defines a “boarding house” as “A building occupied as a single housekeeping unit, where lodging or meals are provided for more than three persons for compensation, pursuant to previous arrangements, but not for the public or transients;.

During the time the 2012 CAPER was written the City was working toward amending its definition of “group living arrangements” to allow for them to be permitted uses within the Single Family Residential Zoning Districts. The Ordinance 13-948 was approved in 2013.

Saint Charles amended its zoning code in 2013 to allow for the creation of

temporary shelter for persons who are homeless. At the same time as the passage of the ordinance, a church—Mount Zion Missionary Baptist Church—was granted a conditional use permit to operate a warming / cooling shelter for single men, making it the only shelter for single men in the county.

Evaluation of Saint Charles' Fair Housing Activities

Boards and Commissions

The 2008 AI Study recommended that the City create a Human Relations Commission to promote diversity within the city. The City has taken action on this recommendation. On 6/18/08, the council approved Ordinance 08-126, which established a Human Relations Commission with a mission to:

- Promote respect, harmony, and understanding throughout the St. Charles community
- Promote mutual understanding and respect among all social, racial, religious, cultural and ethnic groups in the community
- Endeavor to eliminate prejudice among various groups in the community and create harmonious relationships among citizens, groups, agencies, and departments within the city.

The Commission meets monthly and is composed of ten members, including Mayor Sally Faith and Bridget Ohmes, Council Liaison, and Anita Telkamp, CDBG Administrator.

In addition to the Human Relations Commission, the Fair Housing Commission continues to meet on a quarterly basis. The city also has a Citizens with Disabilities Advisory Board and a Senior Citizen Advisory Commission, both of which meet monthly.

The Citizens with Disabilities Advisory Board advises the city on all matters relating to the welfare of citizens with disabilities residing in the city. The Board recommends action to remove impediments to full inclusion for persons with disabilities in all aspects of public life, including removal of architectural in public and private housing, communication and transportation barriers. The Advisory Board oversaw the publication of a City of St. Charles Accessibility Guidebook—a glossy 8-1/2 x 11 format booklet with helpful information for persons with disabilities.

Three of the four commissions have received training and information on fair housing and have discussed the 2012 AI Study. The City, including its current Mayor Sally Faith and former Mayor Patti York are to be commended for their efforts to recruit a diverse group of citizens to help ensure City Government provides equal opportunity to all.

Fair Housing Education

Another recommendation from the 2008 and the 2012 AI Study was to conduct fair housing educational workshops for members of the community, for housing professionals and for city staff. Saint Charles has contracted with the Metropolitan St. Louis Equal Housing Opportunity Council to provide fair housing training, usually on a semi-annual basis, to ensure that members of boards and commissions as well as city staff are educated on the law.

The city has also provided support for members of the Fair Housing Commission and the Human Relations Commission, as well as Planning Division staff to attend EHOC's Regional Fair Housing Training conferences, which occurred in April, 2017. Several Saint Charles officials have been recognized with the Open Door Awards granted by EHOC, including the city's Human Relations Commission members Pamela Coaxum and Mary Harrison, and CDBG Administrator

Anita Telkamp. The Human Relations Commission was presented the Missouri Human Rights Commission of the Year Award by the State of Missouri Department of Labor, Commission on Human Rights. Anita Telkamp was also recognized for her efforts to assist the less fortunate by St. Charles Habitat for Humanity, and the St. Charles Ministerial Alliance, and the Community Council of St. Charles County. Anita was provided the Excellence in Public Sector Award by St. Louis Community Builders Network in 2015.

The City's Human Relations Commissions assisted EHOC and facilitated a break out training with other HRC organizations within the region during the 2017 Annual Fair housing Conference. City staff, Chuck Lovelace, Anita Telkamp, Lisa Bullock, and Bridget Ohms Ward 10 Councilperson also attended the annual Fair Housing Conference.

The 2012 AI Study recommended that the city publicize its homeowner assistance programs more effectively on its website. The city now has a tab under its "residents" pull down menu for "Homeowner Assistance" which has information about down payment assistance for first time home buyers, accessibility grant application, hoe improvement loan program and weatherization program. This information is easily accessible.

Foreclosure Prevention

The 2012 AI Study contained several recommendations regarding foreclosures. The study itself identified the lenders with the highest number of foreclosures in Saint Charles. The study recommended that the city educate its residents on foreclosure prevention. City staff refer the general public as well as, home improvement clients to Beyond Housing for help with loan modifications.

With the passage of an ordinance allowing emergency shelters in Saint Charles, the city addressed an impediment to fair housing for homeless persons. There has been a lack of services for homeless single men in Saint Charles County. Although the planned Analysis of Impediments 2012 Saint Charles, Missouri warming / cooling center will only provide temporary shelter on very hot or cold days, it is a first step in closing a gap in the continuum of care that impacts a protected class of persons—men, however the non-profit organization that are in charge of the cause were unable to secure funding for this project. Salvation Army has stated that they will build a shelter and house the men next to the facility in the North End Neighborhood, at this time there is no definitive date for construction.

The city has taken the following recommendations under consideration and is either working on a solution or has adopted them in one form or another.

Saint Charles should continues its efforts to combat prejudice through its Human Relations Commission, Fair Housing Commission and Citizens with Disabilities Advisory Board. Members of these commissions should have training on fair housing to ensure that they are aware of the law. Fair Housing training was provided to these Commission in 2017.

Saint Charles continues to offer educational workshops on fair housing to ensure that city officials and commissioners, community residents, and housing professionals are aware of their rights and responsibilities under the law. The City supports at least two educational programs per year on fair housing. Open fair housing workshops aimed at attracting community residents usually have low participation rates, so instead, the City workshops aimed at reaching

community residents target existing groups and meetings. For example, the City partnered with the St. Charles Realtor's Association and held a Diverse Housing Summit. Fair Housing Education was provided during the Continuum of Care and organization made up of more than 30 public services providers.

Saint Charles continues to support accessibility modifications through its Home Improvement Loan Program and Accessibility Grant.

Fair Housing Narrative Conclusion.

The City is working toward the establishment of completion goals to implement the recommendations made by EHOC in the 2012 AI in its 5 Year Consolidated Plan 2016 - 2020. The City views neighborhoods as the stabilizing factor of a community. The quality of life in our city is depending upon the quality of life in our neighborhoods. The City of St. Charles is focused on maintaining and improving the quality of life in all its neighborhoods.

Low-income neighborhoods have special challenges, particularly because they are located in areas of the city with aging housing stock in need of repair and have declining property values. To meet these challenges the City of St. Charles effectively utilized local resources, Community Dev. Block Grant, HOME Investment Partnership, Neighborhood Stabilization Grant, Low Income Weatherization Grant, Lead Reduction Program, and Historic Façade Grant funds to assist with low income housing needs, to stabilize neighborhoods and assist with maintaining property values for the community as a whole.

Public and Indian Housing

1. Please clarify the actions the City of St. Charles is taking to address the needs of Public Housing residents.

Response: As stated in pages 28-31 Public Housing Strategies:

The City of St. Charles works in partnership with the Public Housing Authority, PHA, Habitat for Humanity, Metropolitan St. Louis Equal Housing Opportunity Council, and HUD to promote the enforcement of fair housing through publications, training sessions and support from the Housing Task Force, Family Self Sufficiency Advisory Board, the City of St. Charles Citizen's With Disabilities Advisory Board, Senior Citizen's Advisory Board, Continuum of Care, and the St. Charles Fair Housing Commission to remedy discrimination in housing.

The Housing Authority participates in the CDBG public hearings during the development of annual action plans, and their residents are invited to attend. PHA provides details at public hearing regarding their home owner self help program and provided status of remodeling projects for the rental units. The City works closely with the PHA, and the Mayor of St. Charles appoints the members of the Housing Authority Board, who oversee the operations of the Housing Authority. The City certifies that the Housing Authority's Annual Consolidated Plan is consistent with the CDBG Annual Action Plans. Community Development Department performs the Environmental Review of the Housing Authority's projects to insure all the Laws of NEPA are applied. In addition, the Director of the Housing Authority is invited to all public hearings and consultations with HUD on the City's Community Development Block Grant Programs, notices\invitations are placed on the public bulletin boards at the PHA facility for residents to review. A member of the Public Housing Authority Board also holds a seat as Chairman for the City of St. Charles Fair Housing Commission, and CDBG staff is the liaison to this Commission. The Commission is informed quarterly of the activities of the Public Housing Authority.

Items posted at the PHA include: CDBG budget and activities planning, marketing materials\ brochures for the Homeownership Assistance Program, (1st Time Home Buyer Program), along with other CDBG funded public services agency information.

2. Does the City have specific activities that will support homeownership through the Public Housing Authority (PHA)?

Response: The City is working to educate PHA clients that are enrolled in the PHA Homeownership\Self Sufficiency Program about homeownership opportunities thru HOME Funded and NSP funded programs. The City is marketing NSP homes to PHA clients but it is unclear, given the tightening credit requirements, that PHA residents are able to obtain financing. If a PHA client were to improve their credit score sufficiently to qualify for a mortgage they could access the down payment assistance in the amount of \$5,000, and potentially buy an affordable, rehabbed, energy efficient, healthy home thru NSP.

The City works with Habitat for Humanity which provides homeownership outreach to PHA residents and including those enrolled in the Homeownership\Self Sufficiency Program

Monitoring

1. Please elaborate and clarify the City's monitory process and procedures. Explanation for slow moving projects.

Response: The City uses the OMB Circular A-133 Audit process to monitor the CDBG program requirements.

The City requires the homeowner to obtain three quotes or bids for every project. Many times the home improvement client explains to staff that they have difficulty obtaining bids from contractor especially during the summer and fall. Their difficulty causes delays the start of a project. There are times that the client has to wait until the following spring to begin a project. When all three quotes and the work sheet is submitted it is reviewed by the Code Enforcement Officer before the homeowner hires the contractor.

Appendix Documents:

CPMP CDBG Projects

IDIS Reports PR03, PR06, PR23, PR26, PR83

Map of CDBG Code Enforcement within US Census Tracts and Block Groups

Public Notices

Affidavits of Publication

Public Comments: Note there were no public comments received during the open public comments period from March 9 – 29, 2017.