



City of St. Charles, Missouri
Five Year Consolidated Plan FY 2016-2020
Program Year One Annual Action Plan 2016

Annual Action Plan includes the [SF 424](#) and Narrative Responses to Action Plan questions that CDBG, HOME, HOPWA, and ESG grantees must respond to each year in order to be compliant with the Consolidated Planning Regulations.

Narrative Responses

The Five Year Consolidated Plan FY 2012-2016 was amended to align with St. Louis HOME Consortium. The new 5 year plan begins in 2016 and runs through 2020.

Program Year One Annual Action Plan 2016

Executive Summary

Notice of Public Hearing
City of St. Charles, Community Development Block Grant (CDBG) Programs
Consolidated Plan Amendment

Per 24 CFR 91, Subpart E-Consortia; Contents of a Consolidated Plan, as a member of the St. Louis HOME Consortium, the City of St. Charles, Missouri is required to be on the same program year as that of St. Louis County, the HOME Consortium lead. In FY2015 the City of St. Charles was in program year four of a five year period. This change will mean that in FY2016, the City of St. Charles will instead be in program year one to align with that of St. Louis County, instead of program year five.

24 CFR 91.400 Applicability. This subpart applies to HOME program consortium, as defined in 91.5 (see 24 CFR part 92). Units of local government that participate in a consortium must participate in submission of a consolidated plan for the consortium, prepared in accordance with this subpart. CDBG entitlement communities that are members of a consortium must provide additional information for the consolidated plan, as described in this subpart.

In accordance with 24 CFR 91.402 Consolidated program year. (a) *Same program year for consortium members.* All units of general local government that are members of a consortium must be on the same program year for CDBG, HOME, ESG, and HOPWA. The program year shall run for twelve month period and begin on the first calendar day of a month.

In accordance with 91.401 Citizen Participation Plan, the consortium must have a citizen participating plan that complies with the requirements of 91.105. If the consortium contains one or more CDBG entitlement communities, the consortium's citizen participation plan must provide for citizen participation within each CDBG entitlement community, either by the consortium or by the CDBG entitlement community, in a manner sufficient for the CDBG entitlement community to certify that it is following a citizen participation plan.

The City of St. Charles, through its CDBG Administrator, held a thirty-day (30) public comment period from Monday May 1, 2016 until Tuesday, May 31, 2016 on this amendment to align The City of St. Charles CDBG Consolidated Plan year with that of St. Louis HOME Consortium as required by the U.S. Department of Housing and Urban Development. There were no comments in favor or opposition to the amendment.

Program Year 1 Action Plan Executive Summary Response:
Five Year Consolidated Plan FY 2016-2020
First Program Year Annual Action Plan 2016

FY 2016 CDBG Budget

Project Name	Allocation	Explanation
Home Improvement Program (HIP/HILP)	\$146,540	Loans & Grants/ home repairs for low-moderate income residents
CDBG Administration	\$ 66,627	Program operations, fair housing, training, public notices. HUD Regulations cap administration funds at 20% of annual allocation, and allow for 20% of program income receipts to fund admin
Code Enforcement	\$70,000	CDBG area specific
Public Services	\$ 49,970	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 additional public services
Total	\$333,137	

Proposed use of program income:

Home Improvement Loan Repayments are estimated to be \$50,000 with 20% or \$10,000 to fund grant administration, with 15% or \$7,500 to fund public services and the remainder of \$32,500 to fund additional home improvement activities.

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. The total proposed budget including program income is \$383,137.

During the public consultation process for the development of the City's Five Year Plan, a list of the following needs was 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, to create jobs through support of low income businesses
5. Address the unmet needs of the Homeless Population in the City of St. Charles which population includes the youth, battered women and their children, and single men
6. Homeless 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 and/or Affordable Housing
2. Provision of Safe Livable Environments

3. Expand Economic Opportunities
4. Affirmatively Further Fair Housing and Equal Opportunity

Strategies

1. Through Code Enforcement Activities: Increase the quality and availability of affordable decent, safe rental housing
2. Through HIP/HILP: Increase the range of housing options and related services for persons with special needs, with a focus on veterans needs
3. Through Public Services: Improve the services for low-income persons, increase the number of persons moving from homelessness or transitional housing to permanent housing with a focus on our veterans and single men
4. Through HIP/HILP and Public Services: Improve economic opportunities for low-income persons, affirmatively further fair housing and equal opportunity

Other CDBG/HUD Related Programs

5. Through membership with St. Louis HOME Consortium: Increase access to affordable owner housing units
6. Through Neighborhood Stabilization Program (NSP): Increase access to decent, safe affordable owner housing units, for low to moderate and middle income households

The objectives for the City of St. Charles Community Development Block Grant Five Year Consolidated Action 2012-2016 and the Annual Action Plan for FY2016 are also aligned with the Livability Principles described by the Partnership for Sustainable Communities, which includes the U.S. Department of Housing and Urban Development (HUD), the U.S. Department of Transportation and the U.S. Environmental Protection Agency.

The City of St. Charles will work at the local level to assist the St. Louis HUD Office and align its goals with those of HUD's. In FY2012, HUD published its new Strategic Plan for FY2016-2020, which defines a new set of policy and organizational priorities for the Department. The plan provides the direction and focus HUD needs to achieve its mission which is: create strong, sustainable, inclusive communities and quality affordable homes for all. The City's 2016-2020 Consolidated Plan goals are aligned with four of HUD's goals to:

1. Strengthen the Nation's Housing Market to Bolster the Economy and Protect Consumers. The City will assist by providing programs to educate the public on matters such as Fair Housing, Financial Literacy, and Foreclosure Prevention. The Neighborhood Stabilization Program, Homeownership Program and Home Improvement Program can all contribute to strengthening the housing market at the local level. These programs help to place people in homes, keep people in homes, and gives carpenters and tradesmen work which will have a positive impact on the local economy. The Code Enforcement Officer protects consumers by working with the HIP/HILP client to insure they are getting a fair bid for the work on their homes.

2. Meet the Need for Quality Affordable Rental Homes. The City will assist by funding the Code Enforcement Program to insure existing affordable rental housing stock meets a higher standard than HQS (a basic Housing Quality Standard). Rental properties in the low-moderate income neighborhoods will be thoroughly inspected for health and safety violations. No rental units will be occupied until all required measures are corrected and the property is safe for occupancy. The Code Enforcement Officer also inspects homes in the same manner for the (HIP/HILP) and the Homeownership Assistance Program or also known as First Time Homebuyer Program/Down Payment Assistance (DPA), and for the NSP.

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

The City will assist by funding public services that provide emergency utility, rent and mortgage assistance, including food pantries and other types of services for those in extreme poverty to prevent homelessness. Programs such as HIP/HILP, DPA, NSP, and Rental Occupancy Inspection Program also contribute significantly to this goal. Making homes healthy, safe, and affordable improves the quality of life for the residents in our community.

4. Build Inclusive and Sustainable Communities Free from Discrimination.

The City will assist by working with the Public Housing Authority, Citizens 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.

Overall Summary of Past 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 of the programs funded with CDBG, HOME, and NSP funds. CDBG and HOME funded programs have provided homeless prevention, counseling and fair housing education, code enforcement, home improvements for owner occupied units, energy efficiency, safe and healthy housing, accessible housing, improved economic opportunities, neighborhood stabilization of property values, and affordable home ownership opportunities, and provided safe living environments for rental housing. The City worked with St. Louis County as the lead member of the St. Louis HOME Consortium to provide opportunities to partner with a Non-Profit Certified Community Housing Development Organization (CHDO). The St. Charles County Housing Corp. is a certified CHDO and has acted as the City's holding entity and co-developer for the NSP. The City also works with Habitat for Humanity occasionally to help assist very low income households who would not otherwise qualify for a mortgage loan to become homeowners.

Programs/Projects/Activities/Objectives

Home Improvement Program, (HIP/HILP)

*National Objective: LMC - LOW/MODERATE LIMITED CLIENTELE BENEFIT
Budget for 2016: \$146,540, plus \$32,500 from program income for a total budget of \$179,040. The proposed number of Completed Units Per Year is 10-15 throughout the Five Year Plan. HIP/HILP is consistent with HUD Goals: 1. Strengthen the Nation's Housing Market to Boister the Economy and Protect Consumers. HIP/HILP meets all the Objectives identified in the CDBG Consolidated Plan 2016-2020.

Objectives

Create Suitable Living Environments

Provide Decent Affordable Housing

Create Economic Opportunities

Furthering Fair Housing and equal housing opportunities for all people.

Outcomes

Create Suitable Living Environment Outcomes

Affordability and Accessibility for the purpose of providing decent affordable housing

Sustainability for the purpose of creating suitable living environments

HIP/HILP program improves access to affordable home repairs, the 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.

HIP/HILP program improves sustainability. Home repairs create suitable living environments and sustain decent affordable housing. Energy efficiency improvements assist with sustaining affordable housing payments, by increasing monthly disposable incomes and improve economic opportunity. HIP/HILP improves economic opportunity for contractors that may hire additional people and may provide additional jobs.

The objectives to conserve, sustain and improve existing decent safe affordable housing for low-moderate income households have been successful since the early 1980s through the HIP/HILP. This program/activity receives the majority of annual CDBG allocation, due to the need for affordable decent safe housing for low and moderate income households. Wards 1 and 2 have the largest number of older housing stock, the most affordable housing, and are where many low to moderate income minority and special needs households reside.

The HIP/HILP is designed to upgrade existing owner occupied housing units to meet current health and safety standards, and to meet energy efficiency standards when possible. 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 as it allows them to have more income that could be used for other necessary living expenses, thereby providing a positive economic benefit. Many low-income clients have received improved access to low-zero percent loans which would not be possible for them to access due to credit concerns. The positive impact of the HIP/HILP has been substantial for specific households of low-moderate income from minority, to elderly, disabled, female & elderly female headed households and also for the neighborhoods where the homes are located. The HIP/HILP is successful and provides affordable access to home repairs. HIP/HILP clients are HIGHLY encouraged to hire small local and WBE/MBE companies and as an indirect benefit, HIP/HILP provides work for contractors which has a positive local economic impact. Many mobile home owners have accessed home repair grants. The majority of this clientele is 50% or below of the Area Median Income. Overall, these are emergency repairs such as furnace and air conditioning, electrical, plumbing repairs or replacements. Grants are provided to elderly and disabled households to improve access to their homes.

Past Performance:

HIP/HILP provides access to affordable accessible repairs for persons with disabilities. The programs provide healthy, safe living environments through lead remediation and the requirement of smoke detectors and carbon monoxide detectors. It also provides neighborhood community benefits by stabilizing property values. 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. The HIP/HILP is the most utilized CDBG activity.

Twenty One HIP/HILP units were made habitable with CDBG funds in 2014, and approximately 750 housing units have been improved since the City became an CDBG entitlement community in the 1980s.

Code Enforcement Activity (CEA).

*National Objective: LMC - LOW/MODERATE LIMITED CLIENTELE BENEFIT
Budget for 2016 is \$70,000. The proposed completion of decent safe livable units 125 for 2016. The CEA meets the Consolidated Plan 2016-2020 Objectives to:

Objective: Create Suitable Living Environments

Outcomes:

Decent Affordable Housing

Accessibility for the purpose of providing decent affordable housing

Sustainability for the purpose of creating suitable living environments

CEA is consistent with Three of HUDs Consolidated Plan Goals to:

1. Strengthen the Nation's Housing Market to Bolster the Economy and Protect Consumers

2. Meet the Need for Quality Affordable Rental Homes

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

The objective for CEA is also to conserve, sustain and improve existing decent safe affordable housing. This activity is also focused on improvement of rental housing quality. The activity has been very successful since the early 1990s. Since that time CDBG provided funds for 1 full time Building/Code Enforcement Officer to assist with the Home Improvement Program, and to provide code enforcement in the areas of the city that are determined by census blocks to be predominately populated by low-income and minority households. This project is consistent with the priority to increase code enforcement in the older neighborhoods which are also in the designated CDBG eligible areas of the City. Code enforcement has also benefited renters by improving housing conditions in rental properties. A complete health and safety inspection is conducted on every housing unit prior to occupancy. Overall the Rental Inspection Program has dramatically reduced the number of substandard rental units, not only in the CDBG areas but throughout the City. Code enforcement activities are concentrated specifically in the following low-moderate income census tracts, 31020 Block 4, 31040 Block 3, 31050 Block 7. The CDBG Inspector also conducts an inspection of mobile homes prior to occupancy of the unit. The purpose of the inspection is to verify that the mobile units are secured/stabilized properly to code, and to insure the exterior electrical connection is safe and secured as necessary. The city provides rental housing inspections through general revenue funds to cover all other areas outside the CDBG districts.

Past Performance:

A total of 125 Rental Units were inspected & approved for occupancy, the units were either habitable or were made habitable by private sector funds as a result of the inspections. Over 1,750 inspections for code violations were corrected in the CDBG target area since 2012.

In 2014, 200 housing units were cited for property maintenance violations, and these units were brought from substandard to standard HQS and local codes. Note that mainly private funds are used to improve and/or make the rental units habitable. Twenty One HIP/HILP units were made habitable with CDBG funds in 2014. A total of 150 housing units were improved due to the code enforcement activities. It is anticipated that the average inspection will remain the same each year throughout the Five Year Consolidated Plans 2016-2020.

Public Services Grants (PSG).

*National Objective: LMC - LOW/MODERATE LIMITED CLIENTELE BENEFIT
Budget for 2016 \$49,970, proposed units of service for 2016 is 100.

PSG Objectives:

- A. Create Economic Opportunities
- B. Furthering Fair Housing and equal housing opportunities for all people.

PSG Outcomes:

Accessibility for the purpose of creating economic opportunities
Affordability for the purpose of creating economic opportunities
Sustainability for the purpose of creating economic opportunity

This outcome category applies to activities that make services, infrastructure, housing, or shelter available or accessible to low-and moderate-income people, including persons with disabilities.

The City has committed to funding public services agencies with the maximum cap of 15% of its annual allocation since the 1980s. The agencies that are funded in each annual action plan assist the city to meet priority needs, goals, and objectives. The successful outcome of funding public services is improves and increases access of services for households in extreme poverty. The public services component though small in funding provides the greatest attainment of goals and increases the number of households served.

Grants to social service agencies are consistent with the priority of creating economic opportunities for those with special needs and for financially fragile families. The majority of persons receiving assistance are 50% or below of the Area Median Income, because they are on fixed or limited incomes, or are minimum wage earners. The activities of agencies supported during the past year were; Sts Joachim and Ann Care Service, food, clothing bedding, rent and utility assistance; Mid East Area Agency on Aging, Senior Citizen Meals & Meals on Wheels for the disabled; Delta Center for Independent Living, workforce and essential transportation for special needs populations; We Love St. Charles for services to families with children; schools supplies, and coats for kids, and Mathias Lot Church, homeless prevention, rent, utility and mortgage assistance. The Continuum of Care addresses the unmet needs of homeless persons in the community. Crider Center has a homeless prevention program for persons with mental disabilities.

Past Performance: Public Services activities were successful and provided improved and new access to public services activities for 300 households in 2012 - 2015.

The Homebuyer Assistance Program.

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

This program meets all the Objectives identified in the CDBG Consolidated Plan 2016-2020

Objectives:

- Create Suitable Living Environments
- Provide Decent Affordable Housing
- Create Economic Opportunities
- Furthering Fair Housing and equal housing opportunities for all people.

Outcomes:

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
Allows for equal opportunities for all persons to access housing and furthers Fair Housing

A large part of the City's allocation through the St. Louis HOME Consortium is used to provide housing counseling, down payment and closing costs for income eligible home buyers. The CDBG Code Enforcement Officer inspects each property for compliance with the city's current property maintenance codes and conducts a visual lead assessment. Properties built prior to 1978 that show evidence of deteriorated paint surfaces are not approved for purchase with HOME funds. Over the past few years all the HOME funded Down Payment Assistance funds were used and twenty households were provided access to affordable housing. Should the funding continue at its present rate, the program will continue to provide 8-10 affordable housing units each CDBG Annual Action Plan year in 2016-2020.

General Questions

1. Describe the geographic areas of the jurisdiction (including areas of low-income families and/or racial/minority concentration) in which assistance will be directed during the next year. Where appropriate, the jurisdiction should estimate the percentage of funds the jurisdiction plans to dedicate to target areas.

General Questions YEAR 1 RESPONSE: Five Year Consolidated Plan FY 2016-2020 First Program Year Annual Action Plan 2016

1.1 Geographic Area

1.2 Racial/minority concentration:

The white - black index of dissimilarity was computed down to the block level for St. Charles based on 2010 census data. The index in 2010 was 51.19. This shows a gradual improvement from the 2000 census, for which the index was 54.3. The City of St. Charles has a higher index of dissimilarity than St. Charles County as a whole, which had an index of 47.69 based on 2010 block level census data. Both were well under the dissimilarity index for the St. Louis MSA, calculated at the block group level, which was 74.18. The exposure index (also called isolation index) measures the average percentage that group A is exposed to group B across an area. In 2010, the exposure index for St. Charles was 5.48, indicating that the average white person was exposed to an average percentage of 5.48 blacks. For St. Charles County the white-black exposure index was only 3.9. In 2000, the white-black exposure index in the City of St. Charles was 3.21. As an indication of furthering fair housing, these indices are moving in the right direction, demonstrating that St. Charles is becoming less racially segregated, and showing that more people are exposed to diversity than in previous years. The white black exposure index for the entire metropolitan St. Louis was 8.05, using 2010 census block group data.

1.3 Demographic Profile Total Population

After doubling its population between 1950 and 1970, and doubling it again between 1970 and 2000, the population of St. Charles has begun to stabilize. The population in 2000 was 60,321 and in 2010 was 61,171, representing only a one percent increase during the decade. The population in 2010 was less than predicted: the American Communities Survey 2005-09 had projected the population at 63,695.

1.4 Race and Ethnicity

St. Charles is still a mainly non-Hispanic white city, with 87.48% of the population identifying as white. Blacks are the largest racial/ethnic minority in St. Charles (5.91%), followed by Hispanics (4.19%) and Asians (2.54%). However, the city has diversified significantly since the 2000 census. The Hispanic population has more than doubled, from 1187 in 2000 to 2759 in 2010. The black

population has nearly doubled, from 2097 in 2000 to 3889 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 last census was conducted in 2000.

Table 2: Minority Population Change 2000 - 2010

	Hispanics	Blacks	American Indi/Alaska Native	Asian	2+ races
2000	2%	3.5%	0.3%	1%	1.2%
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 CT 3101 with 3 residents or 3112.96 with 35 residents) were more than 90% white. In 2000, the census tracts with the lowest percentage of whites was Census Tract 3109.01, which was 87.3% white. In 2010, eight of the census tracts were less than 87.3% white.

The map (Addendum 3) shows areas (census block groups) that are less than 3% black. The block group (Block Group 2, Census Tract 3101) that shows up most highly segregated (colored bright red) is a block group with only three persons. There are, however, areas with substantial population that have few blacks. Block group 2, Census Tract 3115 has a population of 1254 and has only 7 blacks. Block group 1 and block group 2 of census tract 3106.02 has a total population of 4422, with 60 blacks, or 1.35 percent of the population. Interestingly, block group 1, census tract 3111.45 is not incorporated into the city. It has a lower percentage of blacks. The block group seems to be surrounded on all sides by the city.

General Question 2.

2. Describe the basis for allocating investments geographically within the jurisdiction (or within the EMSA for HOPWA) (91.215(a)(1)) during the next year and the rationale for assigning the priorities.

General Questions YEAR 1 RESPONSE:

Five Year Consolidated Plan FY 2016-2020

First Program Year Annual Action Plan 2016 Describe the basis for allocating investment geographically. Although CDBG funds are accessed city wide by persons of low to moderate incomes, more than 50% of the funds for the Home Improvement Program (HIP/HILP) are used in Wards 1 and 2. Residents within these 2 wards are generally low income, (between 60-50% AMI). Also the neighborhoods within Wards 1 and 2 are where the highest concentration of minority populations reside. This information is documented through the US Census. The majority of the City's aging housing stock is located in Wards 1 and 2. Over the years the funds have been used by homeowners that cannot afford to make necessary repairs to their older homes. The majority of homes in Wards 1 and 2 were built prior to 1978 and are subject to lead inspections and testing. Lead testing and abatement is too costly for low/moderate income homeowners to bear and more often than not the homes in these two wards need many other repairs. When homes test positive for lead the client is referred to the Lead and Hazards Remediation Program funded through HIP/HILP or the City's allocation of HOME Funds from St. Louis County HOME Consortium. The lead program service is offered as a 5 year forgivable grant. Repairs generally include window replacement, painting and capsulation of impacting surfaces and complete remediation when necessary. As per CDBG and HOME Regulations the lead

abatement/containment work must be completed by lead certified contractors. Lead work is also inspected by the State of Missouri Environmental Protection Agency to insure lead safe practices are employed and that contractors have proper license and certifications. The City has contracted with United Infrastructure Corp., a qualified Lead Certified Firm, to provide lead testing services and construction management services to insure compliance with State and Federal requirements.

General Question No. 3. Describe actions that will take place during the next year to address obstacles to meeting underserved needs.

General Questions YEAR 1 RESPONSE

Five Year Consolidated Plan FY 2016-2020

First Program Year Annual Action Plan 2016: The obstacles to meeting the underserved population's needs are mainly providing public access to resources and information. One solution to address the obstacles is through collaboration with other agencies, the other is through the use of technology. Another obstacle is the lack of funding for public service agencies. The City will continue to seek funding to address this obstacle in 2016.

Improve Information Accessibility Lessons Learned.

The city publicizes 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, and Home Improvement Programs. Going forward, the City will work to improve public access to relevant information regarding existing and new programs, as well as public services, and to inform citizens of the CDBG activities planning and budgeting processes.

Improve Support for Special Needs Populations. Special Needs populations includes the elderly, disabled, frail ill, female headed households, near homeless and very low-income households. Support includes development and distribution of resource guides. In 2015 the City of St. Charles Citizen's With Disabilities Advisory Board will complete the update of the 2008 Accessibility Guidebook. City boards and commissions made up of residents collaborated and assisted with the improvement of the revised guide. Collaborators includes: Fair Housing Commission, Human Relations Commission and the Senior Citizen's Advisory Commission, Life Skills for people with developmental disabilities, Paraquad, and Lindenwood University. The university allowed students in the Social Services Degree Program to assist with the update of the guidebook as a class project in 2014. The updated guide will be made available in requested language translations as well as other accessible delivery formats upon request. CDBG funds will be made available to assist with printing and format costs. The revised guide will be made available on the city web site at www.stcharlescitymo.gov.

Public Services for Homelessness and Homeless Prevention.

The City of St. Charles continues to work in partnership with St. Louis County, the St. Charles County Community Council and all municipalities in St. Charles County to address the needs of the community. Year after year we hear from our constituents, the members of the Continuum and our public serves partners that there is an increase in the need for additional funds for the various programs that support our special needs populations and the general public. It was reported that even as the economy continues to improve, services are on the rise and St. Charles County as a whole faces a growing population in need with less and less resources to serve them. The City of St. Charles will continue to seek additional funding for public services. In 2016 the City will set aside 15% of the

program income received from HIP/HILP repayments to funds additional public services that prevent and eliminate homelessness.

The City of St. Charles will also continue participation with the Continuum of Care to access funding from the Emergency Shelter Grant Program and the Homeless Challenge Grant Program in 2016-2020, and encourage and assist new agencies with the application process.

4. *Identify the federal, state, and local resources expected to be made available to address the needs identified in the plan. Federal resources should include Section 8 funds made available to the jurisdiction, Low-Income Housing Tax Credits, and competitive McKinney-Vento Homeless Assistance Act funds expected to be available to address priority needs and specific objectives identified in the strategic plan.*

General Questions YEAR 1

4. Identify Funding Resources Response:

CDBG: The City continues to set aside the allowable CDBG 15% Cap to fund public services. Public service agencies are funded that meet the goals and national objectives for this 5 year plan.

Missouri Div. of Family Services, McKinney-Vento Homeless Assistance Act funds. Bridgeway Counseling Services receives these funds and provides emergency shelter for battered women and their children. Another agency receiving funds is Youth In Need, (YIN) which is a youth shelter that provides short term and long term shelter and counseling. YIN's program is similar to Bridgeway's as they assist the client toward self sufficiency. YIN's newest program was developed to address the unmet needs of youth aging out of foster care. The new program was developed to fill an unmet need for homeless of youth. YIN assist the client age 18 – 22 years of age to complete high school, trade school and/or community college and provides rental subsidy while they work attend school part time. At the end of the agreed to period the youth client is self sufficient. 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 58 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.

The following social service agencies are responsible for providing aid to homeless, at risk populations and other targeted population groups: North East Community Action Corporation, Bridgeway Counseling, Crider Center for Mental Health, Delta Center for Independent Living, St. Charles Crisis Nursery, FISH of St. Charles, Mideast Area Agency on Aging, Sts. Joachim/Ann Care Center, OASIS Food Pantry, and Youth In Need, Matthias Lot Church, The Community Council of St. Charles County and Salvation Army.

Managing the Process

1. *Identify the lead agency, entity, and agencies responsible for administering programs covered by the consolidated plan.*

1. Response Five Year Consolidated Plan FY 2016-2020

First Program Year Annual Action Plan 2016: The departments involved in executing the Consolidated Plan are, the Office of Mayor, Department of Community Development, Office of Administration, the Legal Department, Office of Finance, and

Office of City Clerk. The Department of Community Development performs the majority of the administrative tasks of the CDBG programs. The CDBG Administrator works to insure the City complies with all the regulations listed in 24 CFR Part 570. The Mayor is the Certifying Official. The Legal Department and Department of Administration also provides legal advice and guidance for regulatory compliance and local policy. The Finance Department balances CDBG accounts, and expenditures and is responsible for the A 1-33 Audit.

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 Con 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 Housing Authority provided a copy of its Consolidated Plan to the City and the Community Development Department performed the Environmental Review of the Housing Authority's projects. 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 Program. A member of the Public Housing Authority Board also holds a seat as Chairman for the City of St. Charles Fair Housing Commission.

2. *Identify the significant aspects of the process by which the plan was developed, and the agencies, groups, organizations, and others who participated in the process.*

Response, Five Year Consolidated Plan FY 2016-2020

First Program Year Annual Action Plan 2016: Consultation/Coordination: In an effort to broaden participation in the consolidated planning process, all known social services, public housing agencies, and various citizen advisory boards were sent notices of a public hearings to discuss community development needs in the City of St. Charles for development of the 5 year Consolidated Plan for FY 2016-2020 and to plan the proposed projects and budget for PY2016. The Office of the Mayor and CDBG staff consulted one on one with Habitat For Humanity, The St. Charles County Housing Dev. Corp., and Sustainable Green Community to see about seeking funding streams to develop affordable housing in 2016. In addition, CDBG Staff consulted with other community based partners such as; Connections to Success, Providence Bank, Carrolton Bank, The Continuum of Care, North East Community Action Corp, Equal Housing Opportunity Council, St. Charles Public Housing Authority, Connections to Success, The Boys and Girls Club of St. Charles, St. Charles Neighborhood Preservation Partnership, Rebuilding Together, We Love St. Charles, Sts. Joachim and Ann Care Service, Calvary Church, Matthias Lot Church, and the Community Council of St. Charles County.

The above consultations proved to be very useful in determining the needs of the community. These partnership relationships are vital and assist the City with planning the FY 2016 Annual Action Plan Goals and Objectives and likewise they help the City meet the proposed outcomes. The CDBG Administrator has developed many community relationships during the Five Year Consolidated Plan and will continue to develop new relationships moving forward through 2016.

During the public consultation process for implementation of the CDBG 2016 Annual Action Plan, city staff held meetings with the following organizations and residents:

- The St. Charles County Continuum of Care
- The Citizens With Disabilities Advisory Board

- The Fair Housing Commission
- The Public Housing Authority
- The Old Town Neighborhood Association

Staff explained the CDBG purposes, National Objectives and discussed the proposed budget and projects for Five Year CDBG Consolidated Plan 2016-2020. The purpose of the Consultation was to obtain suggestions and comments for the use of CDBG funds for 2016. The agendas, minutes, attendance record and any comments are held within the addendum to this document.

3. *Describe actions that will take place during the next year to enhance coordination between public and private housing, health, and social service agencies.*

**Action Plan Managing the Process response:
Five Year Consolidated Plan FY 2016-2020
First Program Year Annual Action Plan 2016**

The City is working to provide program goals and strategies for making all its assurances come true. The City utilizes the assistance of various public services providers as vehicles to accomplish priority community needs as they are counted on to reach to the largest number of low income residents. And in testimony of the City's progress staff has been working with providers and schools and has formed a unified coalition with a purpose to understand and address the needs of families that continually rely on public service providers. The coalition can address these needs by bringing comprehensive care to unstable families and individuals by creating smoother links with agencies and support to the schools. The purpose of the coalition is to establish relationships with people so they receive consistent supportive care over a long time period to break the cycle of living from crisis to crisis. The formation of the coalition came to be as follows:

Vision: We will discuss bringing comprehensive care to unstable families and individuals by creating smoother links with agencies. The relationships that are established will give the opportunity for people to receive consistent supportive care over a long time period and break the cycle of living from crisis to crisis.

Organizations

Dr. Bishop Principal Blackhurst Elmen.	Dr. Jeff Marion Superintendent	Dr. Kay Davis School Dist., Student Serv.	Annette Hill Principal Coverdell Elem.
Steve Wilson Assist. Principal Hardin	Jeff Walker, Principal St. Charles High	Mayor, Sally A. Faith	Dave Beckering City Council President - Ward 7
Mary Ann Ohms Ward 1 Councilwoman	Tom Besselman Ward 2 Councilman	Rick Zerr Circuit Judge	Bruce Evans Dir. Community Dev
Jason Jaggi, Planning Manager, Comm. Dev.	Lieutenant Mark Earhart St. Charles Police Dept.	Officer Charles Hayes St. Charles Police Dept.	Matt Miller Calvary Church
Curt Neff, Calvary Comm. Ministry Pastor	Craig Leavell Boys & Girls Club	Jana Nullk Connections to Success	Dottie Kastigar Community Council

Carrie Rigdon CPRP Dir Crider Health Center	Katrina Harper VP Crider Health Center	Mr. Dwitt Youth In Need	Karen Runge, Sts. Joachim & Ann Care Serv.
Pam Struckhoff Sts. Joachim & Anne	Sharon Cates 1st United Methodist	Carla Potts Director NECAC	Ken Scnidler, Housing Programs Dir. NECAC
Melanie McIlroy St. Charles Housing Auth.	Haley Cayce Crisis Nursery	Reverend Key Salvation Army	Michelle Woods Habitat St. Charles
Jennifer Brown Harvester Christian Church	Georgia Snodgrass We Love St. Charles	Nancy Cope, Dir. Habitat St. Charles	Bob Schreiber OASIS Jobs for Life
Stuart McClure First Baptist Church	Terri Hirsch, Mid- East Area Agency Aging	Laura McCoy, Delta Center Independent Living	Anita Telkamp, Grants Admin., Community Dev
Cherie Magueja, Calvary's Community Care	Charles Schaefer Providence Bank		

Specific accomplishments will be reported within the FY2015 CDBG Consolidated Annual Performance Evaluation Reports (CAPER).

As stated within the 5 Year Con Plan 2016-2020.

The City CDBG staff will work with the St. Charles Housing Authority (PHA) to assist with services and activities for the Public Housing Family Self Sufficiency Program and act as a connector to other non-profit public services agencies to insure efficient serve and to avoid duplication of services and activities. Staff will work to develop a consortium of like kind services that can meet on a monthly basis. The following agencies that have already begun a relationship with the PHA include:

- St. Charles Police Department
- Department of Community Dev.
- St. Charles Community College
- St. Charles Health and Human Services
- St. Charles City/County Public Library
- St. Charles County Dept. of Corrections
- St. Charles Public Schools
- St. Charles Minority Churches
- The Boys and Girls Club of St. Charles County
- Connections to Success, Wheels for Success & Dress For Success
- St. Charles Vocational Rehabilitation
- St. Charles High School
- St. Charles West High School

Staff will work with Non-Profits to track jobs and to link services to jobs through development of a plan similar to a Section 3 Plan. It is hopeful that this plan will evolve to a full fledged Section 3 Policy. CDBG staff have met with the Public Housing Authority,

Bridgeway, and Connections to Success and they are working with persons to obtain jobs. Connections is providing workforce transportation and Bridgeway is providing on the job training. More details will be provided in the 2015 CAPER.

Citizen Participation

1. Provide a summary of the citizen participation process.

1. Response:

Five Year Consolidated Plan FY 2016-2020

First Program Year Annual Action Plan 2016

Citizen Participation Plan:

In accordance with the Citizen Participation Plan for Implementation of the Consolidated Planning process for the Five-Year Action Plans for program years beginning on January 1, 2016 and ending on December 31, 2016, for the Community Development Block Grant Program (CDBG), uses of the HOME funds under the St. Louis County HOME Consortium, uses of Neighborhood Stabilization Program (NSP) funds, notice is hereby given that the City of St. Charles, Missouri will hold several public meetings and hearings to receive comments on the City's housing and non-housing community needs and strengths, particularly as they relate to the CDBG program, HOME Consortium, and NSP, programs.

Discussed CDBG National Objectives and Strategic Plan.

1. Benefit to low and moderate income households; or
2. Aid in the prevention or elimination of slums or blight; or
3. Activities designed to meet other community development needs having a particular urgency because existing conditions pose a serious and immediate threat to the health safety and welfare of the community where other financial resources are not available to meet such needs.

Priority Needs and Program Goals were addressed, including:

- a. Affordable decent safe rental housing
- b. Affordable decent safe owner housing
- c. Accessible housing for special needs populations
- d. Economic opportunities
- e. Address the unmet needs of the homeless population

In an effort to broaden participation in the consolidated planning process, all known social service, public housing agencies, various citizen advisory boards, were sent notices of public hearings to discuss community development needs in the City of St. Charles and the proposed projects and budget for PY2016. Beginning in May 2015 CDBG staff attended, Olde Town Neighborhood meeting, Citizen's With Disabilities Advisory Board, Fair Housing Commission, St. Charles County Continuum of Care, and consulted by phone with the St. Charles Public Housing Authority.

FY2016 CDBG Consultation Meetings:

On May 18, 2015 the CDBG Administrator presented the proposed budget and activities for the 2016 Annual Action Plan to the Olde Town Neighborhood Association. Discussed the proposed Budget, Projects, and Activities for 2016, and reviewed the budgets for 2014 and 2015.

On July 16, 2015 the Fair Housing Commission was scheduled to meet and discuss the proposed budget and activities for the 2016 Annual Action Plan. However, the Commission did not meet the quorum requirements, therefore, the official meeting did not officially

occur. The CDBG Administrator made the presentation to those that were in attendance. The Agenda and Minutes for this meeting are included in the addendum of this document.

Public Hearings;

The official public comments period began on July 1, 2015. Comments were to be accepted through November 12, 2015. Public notices are published 15 days prior to a public hearing and are posted on the City Website at www.stcharlescitemo.com, on the public bulletin board within City Hall, 200 N. Second Street on the 1st and 4th floors, and a copy of the proposed CDBG 2016 Annual Action Plan is available at the front desk of Community Development, City Hall, 3rd Floor Room 303, and at the reference desk of Kathryn Linnenmann Library on Elm Street.

On July 1, 2015 the first Public Hearing was held. The Public Hearing was open to the public and was attended by members of the St. Charles Continuum of Care along with CDBG funded public services including St. Charles Community Council, Crider Center, Metropolitan St. Louis Equal Housing Opportunity Council, Delta Center for Independent Living, Mid East Area Agency on Aging, We Love St. Charles, and Sts. Joachim & Ann Care Service.

The City Council held an open meeting to introduce the CDBG FY16 Annual Action Plan to allow comments on October 6, 2015. The City Council held a Public Hearing on October 20, 2015 for the use of CDBG funds for FY2016. The public comments period was open through November 12, 2015. Traditionally the submission date for CDBG Annual Action Plans was November 15. On November 15, 2015 HUD delayed the submission of the 2015 Annual Action Plan until the funding announcement, which usually occurs in the next year. The City will submit the FY16 Annual Action Plan when directed by HUD to do so in 2016.

Notices of the hearings were posted on the web site at www.stcharlescitemo.gov and on all bulletin boards within City Hall, and published in each of the following news papers: St. Charles Edition of the St. Louis Post-Dispatch. Notices of the hearing were also sent to the minority churches in the City.

NOTE: ALL NOTICES AGENDAS AND MINUTES ARE HEREIN ATTACHED IN THE ADDENDUM OF THIS DOCUMENT.

2. Provide a summary of citizen comments or views on the plan.
- 2. Response:** The goals for the Five Year plan come directly from the many conversations and comments made by residents and public services agencies.

Comments received during the July 1, 2016 Public Hearing includes:

1. Public Services annual allocation should be increased from 15% to at least 20% as the need in the community is great and this increase will allow for more agencies to have their work supported.
2. Public services are such a crucial part to adding those in need in our City. It is my opinion; this service should at minimum match the percentage for administration.
3. The cap for Public Services funds should be increased at least 20%.
4. Cap the Public Services at 20%, increased from 15%.
5. Uses the funds for homeless prevention, owner occupied home repair, emergency housing (hotels), and recommend admin. Cap. to 20%.

3. Provide a summary of efforts made to broaden public participation in the development of the consolidated plan, including outreach to minorities and non-English speaking persons, as well as persons with disabilities.

3. Response: New for 2015 was the inclusion of the Olde Town Neighborhood which is located in Ward 2 and is where a large number of residents live that have accessed the CDBG funded Home Improvement Program. The CDBG Administrator has worked diligently to ever increase public input and awareness of the availability of CDBG, and will continue to address the public needs through the agencies noted above.

4. Provide a written explanation of comments not accepted and the reasons why these comments were not accepted.

4. Response: No Comments were received that were unacceptable.

Institutional Structure

Describe actions that will take place during the next year to develop institutional structure.

**Action Plan Institutional Structure response:
Five Year Consolidated Plan FY 2016-2020
First Program Year Annual Action Plan 2016**

CDBG staff will continue to build partnerships that will fulfill the goals and mission for the Five Year Consolidated Plan 2012-2015, and will continue this effort 2016-2020. Community based partnerships and institutional structure includes:

St. Louis Co. HOME Consortium	St. Charles Homeless Alliance
Mo Assoc for Soc Welfare	St. Louis Regional Foreclosure Prevention Net.
Continuum of Care	Housing Task Force
Hunger Task Force	St. Charles Co. Community Housing Dev. Corp.
St. Charles Ministerial Alliance	North East CommunityAction Corp., NECAC
Beyond Housing	St. Charles Neighborhood Presv Partnership
Equal Housing Opportunity Council	Legal Services of Eastern Missouri
Mo Dept of Economic Dev	Mo Dept of Natural Resources
Mo Dept of Conservation	Mo Div of Family Support Services
St. Charles Economic Dev. Council	Delta Center for Independent Living
Crider Center for Mental Health	Salvation Army
United Way	St. Charles Fair Housing Commission
St. Charles Citizen's w/ Disabilities	Human Relations Commission
St. Charles Homeless Alliance	St. Charles Housing Authority Board
Volunteers in Medicine	Connections to Success
We Love St. Charles	St. Charles Ministerial Alliance
American Red Cross	St. Louis Regional Home Repair Net.
Coalition for Reputable Lending	

Monitoring

1. Describe actions that will take place during the next year to monitor its housing and community development projects and ensure long-term compliance with program requirements and comprehensive planning requirements. **Error! Reference source not found.** Action Plan Monitoring response:

**Five Year Consolidated Plan FY 2016-2020
First Program Year Annual Action Plan 2016**

1. Response: Monitoring.

The social services agencies receiving grants are monitored by City CDBG Administrator annually to verify compliance with HUD and City requirements. Monitoring of social service contractors is conducted annually. All CDBG programs are monitored by the city's annual independent audit. CDBG programs have been major audited every year since 2005. Alexander Furla CPD St. Louis HUD Field Office monitored the program in 2012 and in 2014. Any concern he found was immediately addressed. Through those years, progress has been made to insure compliance with best practices. There were no major findings or concerns from the A-133 Audit or from HUD in 2014-2015.

Lead-Based Paint

1. Describe the actions that will take place during the next year to evaluate and reduce the number of housing units containing lead-based paint hazards in order to increase the inventory of lead-safe housing available to extremely low-income, low-income, and moderate-income families, and how the plan for the reduction of lead-based hazards is related to the extent of lead poisoning and hazards.

Program Year 1 Action Plan Lead-based Paint Response:

**Five Year Consolidated Plan FY 2016-2020
First Program Year Annual Action Plan 2016**

1. Response: Lead-Based Paint

The CDBG Administrator, Anita Telkamp, was trained to conduct Visual Lead Assessment, was certified and is recognized by Environmental Protection Agency (Certif. No R-I-19605-12-057 February 25, 2012 – February 25, 2017) as a Lead- Based Paint Renovator.

For HIP/HILP, DPA, and NSP the HUD Lead Safe Housing Rule is applied which requires lead safe work practices that protect the housing occupant, as well as, the workers during any activity and that destabilizes paint or when rehabilitation occurs on homes built prior to 1978. During the inspection for the Home Improvement Program, a Visual Lead Assessment is conducted. For homes with evidence of deteriorating paint that are built prior to 1978 the City works with a Lead Certified Firm to collect test samples which are then provided to a Lead Certified Lab. If the project area to be renovated tests positive for lead the homeowner is entered into the Lead and Hazard Remediation Program. The client is provided a 5 year forgivable grant to cover the cost for lead remediation. Certified lead contractors are hired to do the renovation. The program also covers the cost for temporary lodging if necessary during the lead remediation process.

The project goal is to remove/contain lead-based paint in three to five housing units per year during each of the five years of the Consolidated Plan.

CDBG staff provides brief consultations on lead hazards to all Home Improvement clients to assist with the prevention of health hazards. All clients receive a copy of the EPA brochure "Protect Your Family from Lead in Your Home" and "Renovate Right."

The CDBG Code Enforcement Officer inspects each property for compliance with the city's current property maintenance codes and conducts a visual lead assessment. Properties built prior to 1978 that show evidence of deteriorated paint surfaces are not approved for purchase with HOME funds. The CDBG Administrator completed the Lead Renovator Initial Course Per 40 CFR Part 745,225

Specific Housing Objectives

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

1. Describe the priorities and specific objectives the jurisdiction hopes to achieve during the next year.
2. Describe how Federal, State, and local public and private sector resources that are reasonably expected to be available will be used to address identified needs for the period covered by this Action Plan.

Error! Reference source not found. Action Plan Specific Objectives response:

Five Year Consolidated Plan FY 2016-2020

First Program Year Annual Action Plan 2016

(1) Response. Units Goals: For each year of the Five Year Consolidated Plan, the goal is to provide home improvement loans to 20-25 units per year. The specific objectives are to conserve, sustain and improve existing decent safe affordable housing for low-moderate income households through the HIP/HILP. This program/activity receives the majority of annual CDBG allocation due to the need for affordable, decent, and safe housing for low and moderate income households. Wards 1 and 2 have the largest number of older housing stock, most affordable housing, and are where many low to moderate income minority and special needs households reside. This geographic area is also where the largest number of foreclosures are clustering. It is a priority need to sustain property values in the older area of the city.

The HIP/HILP is a deferred payment, no-interest loan that helps families and the elderly make needed repairs to their homes, thus keeping the housing affordable for them. These families would not have access to the funds or may not have the credit scores needed to obtain loans on their own to make the necessary repairs. If the household could obtain a loan it may put them in jeopardy of losing their home to foreclosure if they could not afford to make payments on a private loan. The purpose of the loan is to bring existing housing up to code by addressing major structural housing concerns such as, outdated electrical, plumbing facilities, roofs, foundations, and heating/cooling systems. In order to receive funding, the house must need repairs to address code issues and the household must be at or below 80% of AMI.

(2) Response, (access to other Federal, State and local funding). The City refers clients to NECAC, Sts Joachim and Ann Care Service, Connections to Success, and Crider Center for Mental Health who also receive funds to assist low income households.

A. NECAC receives funding for housing related activities from the following agencies: Missouri Low Income Weatherization Assistance Program Grant, Missouri Housing Dev. Commission, Community State Bank, Federal Home Loan Bank of Des Moines IW, and Ameren UE. NECAC also receive a large part of the City's allocation of HUD HOME Funds through the St. Louis HOME Consortium which is used by NECAC to provide housing counseling and down payment and closing costs for income eligible first time homebuyers.

B. Sts. Joachim and Anne Care Service receives funds to assist with housing needs from the following agencies: Hostels for Hope, Housing First, Emergency Shelter Grant, Annual Catholic Appeal, Mercy Charities, CDBG from St. Charles County and City of O'Fallon as well as from annual fund raising.

C. Connections to Success received funds from Jones Foundation, Wal-Mart Foundation,

Lutheran Foundation, Mathematica, Emerson, as well as, from program service fees, social enterprises, and fundraising event.

D. Crider Center for Mental Health receives funds from the following agencies; Missouri Department of Mental Health, HUD, St. Charles County Community Assistance Board, and from a HUD sponsored Supportive Housing Program.

Needs of Public Housing

1. Describe the manner in which the plan of the jurisdiction will help address the needs of public housing and activities it will undertake during the next year to encourage public housing residents to become more involved in management and participate in homeownership.

Program Year 1 Action Plan Needs of Authority. (PHA):

Five Year Consolidated Plan FY 2016-2020

First Program Year Annual Action Plan 2016

1. Public Housing Response

The City values its partnership with the PHA and shares a common goal to help low-income persons move toward self sufficiency and on to economic independence. The City of St. Charles consults with the PHA and its residents on matters regarding the development of the Consolidated Plan. Mayor Sally A. Faith signed the Certification of Consistency with the CDBG Consolidated Plan for the Family Self-Sufficiency Program and for Public Housing Program at Park Ridge Apartments. CDBG Staff will work closely with the PHA's Family Self Sufficiency program and market the Homeownership Assistance Program and the Neighborhood Stabilization Program, throughout the 5 year Consolidated Plan cycle 2016-2020.

The goal is to develop a pool of buyers that obtain the necessary credit score to obtain a mortgage. The City will work with lending partners to insure that the FSS client obtains access to credit counseling and future loans under the Community Reinvestment Act. FSS clients will have an opportunity to view the newly rehabbed foreclosed homes developed by the Neighborhood Stabilization Grant. The client will also have access to \$5,000 for down payment and closing costs from the St. Louis HOME Consortium. It is difficult to predict the number of persons that will complete the FSS program and move up to homeownership in any given year 2016-2020. It is hopeful that at least 2 or 3 persons per year will access these opportunities. Perhaps the first successes of the few will lead and inspire others at the PHA to participate and also become successful.

The PHA residents are invited to all educational events sponsored by the programs noted throughout this document, i.e., CDBG Citizen's Participation for programs planning, 1st Time Homebuyer Seminars, and Fair Housing Educational Events.

The St. Charles Housing Authority has approximately \$46,589 to assist residents to become homeowners. The PHA may also refer clients to the City's 1st Time Homebuyer Program. The PHA uses some of their funds to hire family self-sufficiency coordinators to link adults in the Housing Choice Voucher program (formerly Section 8) to local organizations that provide job training, childcare, counseling, transportation and job placement.

In 2015 there were approximately 25 participants enrolled in the HCV/FSS program. The participant signs a contract that stipulates the head of the household will get a job and the family will no longer receive welfare assistance at the end of the five-year term. As the family's income rises, a portion of that increased income is deposited in an interest-bearing

escrow account. If the family completes its FSS contract, the family receives the escrow funds that they can use for a down payment on a home, paying educational expenses, starting a business, or for paying back debts. The same households continued to participate in the HCV/FSS program 2016, and will most likely continue in 2015 - 2016.

Below is data listed in the St. Charles Urban County Housing Analysis for HUD assisted housing units.

3. St. Charles County's goal is to best serve the needs of all low to moderate income residents living within participating jurisdictions of the Urban County. The County recognizes that while it is able to address identified needs within the Urban County that it may not be able to allocate enough funding to address all of the needs. One obstacle the County is facing is the public service cap placed on the CDBG funding. The County is only able to allocate 15% of its total allocation to public service projects. Two of the three highest priority needs identified during the planning process are both public service projects and therefore limited to 15% of the County's total funding allocation.

4. Staff has been in contact with the Northeast Community Action Corporation (NECAC) who serves as the St. Charles County Public Housing Agency and administers Section 8 Vouchers for St. Charles County. Therefore, there is a direct working relationship and coordination between St Charles County staff and NECAC staff.

Currently there are 651 families enrolled in the St. Charles County Housing Assistance Program (SCCHAP) funded by the Housing Choice Voucher (HCV) program from the Department of Housing and Urban Development. Statistics provided by NECAC on participating families includes:

Admission to the program:

Less than 5 years= 412 families
5-10 years= 140 families
11-15 years= 74 families
20+ years= 25

Ports (vouchers NECAC administers for other PHA's)= 48

The zip code breakdown in St. Charles County for vouchers is as follows:

63301=70 vouchers
63303=41 vouchers
63304=89 vouchers
63332=0 voucher
63348=6 vouchers
63366=157 vouchers
63385= 102 vouchers
63367=16 vouchers
63368=72 vouchers
63376=98 vouchers

The program can currently support 628 as compared to 670 last year due to an increase in per unit costs. NECAC has applied for some additional funding but had not been notified regarding this funding as of the preparation of this plan.

There are 74 families on the current waiting list for Section 8 vouchers.

Low-Income Housing Tax Credits(LIHTC) are awarded competitively to projects across the state, thru MHDC. The County is unaware of anyone applying for this year, but the following projects were approved in St. Charles County in the FY2009, FY2010 & FY2011 rounds: FY09 -Wentzville-48 units of senior housing (Green Gables II); O'Fallon- 42 units of senior housing (Woodlawn Estates Phase I); O'Fallon-48 units of family housing (Townhomes at Homefield); O'Fallon-60 units of senior

Barriers to Affordable Housing

1. Describe the actions that will take place during the next year to remove barriers to affordable housing.

Program Year 1 Action Plan Barriers to Affordable Housing Summary Response: Five Year Consolidated Plan FY 2016-2020

First Program Year Annual Action Plan 2016

1. Barriers to Affordable Housing Response

As a measure to remove barriers to affordable housing the City will continue its membership in the St. Louis HOME Consortia and assist first time homebuyers.

Remodeling costs are very high particularly for hazards abatement. The City will continue to provide lead remediation grants as a measure to remove barrier to affordable housing.

The City will work with Habitat for Humanity and provide them with CDBG funds to assist them with affordable housing work and mission.

The City consulted with the St. Charles Public Housing Authority (PHA) regarding barriers to affordable housing and discussed the lack of available affordable housing. The City and the PHA will work together to address these barriers for public housing needs as follows; Respond to HUD Notices of Funding Availability, and apply for additional funds; Develop partnerships with public and/or private partnerships, such as real estate developers and capital housing markets; Continue to provide home ownership opportunities; and Develop partnerships with nonprofit homeless shelters, transitional housing providers and affordable housing providers.

HOME/ American Dream Down payment Initiative (ADDI)

RESPONSE: This section is not applicable. The City of St. Charles is not a recipient of ADDI funds. The City is a member of the St. Louis HOME Consortium and income qualified persons are able to access funds for Homeownership Assistance.

Error! Reference source not found. **Action Plan HOME/ADDI response:** St. Louis County is the lead member of the Consortium and the Grantee. Refer to St. Louis HOME Consortium 2016 Action Plan for answers to questions 1, 2, 3.a-f, and 4. a-c.

Specific Homeless Prevention Elements

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

1. Sources of Funds—Identify the private and public resources that the jurisdiction expects to receive during the next year to address homeless needs and to prevent homelessness. These include the McKinney-Vento Homeless Assistance Act programs, other special federal, state and local and private funds targeted to homeless individuals and families with children, especially the chronically homeless, the HUD formula programs, and any publicly-owned land or property. Please describe, briefly, the jurisdiction's plan for the investment and use of funds directed toward homelessness.
2. Homelessness—In a narrative, describe how the action plan will address the specific objectives of the Strategic Plan and, ultimately, the priority needs identified. Please also identify potential obstacles to completing these action steps.
3. Chronic homelessness—The jurisdiction must describe the specific planned action steps it will take over the next year aimed at eliminating chronic homelessness by 2016. Again, please identify barriers to achieving this.
4. Homelessness Prevention—The jurisdiction must describe its planned action steps over the next year to address the individual and families with children at imminent risk of becoming homeless.
5. Discharge Coordination Policy—Explain planned activities to implement a cohesive, community-wide Discharge Coordination Policy, and how, in the coming year, the community will move toward such a policy.

Action Plan Special Needs response:

Program Year 1 Action Plan Specific Homeless Prevention Elements Response:
Five Year Consolidated Plan FY 2016-2020
First Program Year Annual Action Plan 2016

Question 1. Identify Sources of Funds private and public resources.

Response:

The City of St. Charles continues to work in partnership with St. Louis County, the St. Charles County Community Council and all municipalities in St. Charles County to address the needs of the community. The City of St. Charles will continue to seek additional funding for public services. The Community Council of St. Charles County convenes the Continuum of Care which consists of all the agencies that have a mission and are funded to address the needs of the homeless in the community. The members include, Salvation Army, NECAC, Sts Joachim and Anne Care Service, Youth In Need, the Red Cross, The St. Charles Ministerial Alliance, and many other non-profits and faith based organizations. These are agencies that receive the McKinney-Vento Homeless Assistance Act, and HUD formula funds, as well as, other special federal, state, local and private funds targeted to homeless individuals and families with children.

In plan years 2016 – 2020 the City will continue to support and assist its public services partners through the Continuum of Care with efforts to apply for local, state and federal funds to address the unmet needs of the homeless and prevent homelessness.

Other Services Available to the Low Moderate Income Public that may or may not be funded through the City's Entitlement Grant that have a positive impact and may indirectly prevent homelessness includes:

- Red Cross provides financial assistance to victims of disaster.
- Information & Referral/ Advocacy – The United Way and the Community Council of St. Charles provide information and referral services and convenes working groups to address unmet needs and service gaps.
- Transportation –St. Charles Area Transit (SCAT) provides a bus system to St. Charles City residents. Sts. Joachim and Ann Care service, Catholic Family Services, Delta Center and several other organizations provide limited transportation assistance to those receiving services from their organization. ATS provides transportation for older adults. LINC provides public transportation in Troy, MO. Connections to Success and Wheels for Success also provide transportation services to those who need rides to work.
- Feeding Program: The Salvation Army serves 60 to 80 people per meal. Lunch is served at noon Monday through Friday. Dinner starts at 6 p.m. Monday through Thursday. There is no dinner on Friday and no meals on the weekend. Anyone is welcome to a free meal, no questions asked. Meals on Wheels through MEAAA provides 2 hot meals delivered to the home bound special needs populations.

2. Homelessness—In a narrative, describe how the action plan will address the specific objectives of the Strategic Plan.

2. Response: The Proposed Units of Improved Access to Services Per Year 2016-2020 listed in the Strategic Plan is 100 units.

In 2016 the City is committed to funding public services agencies with the maximum cap of 15% of its annual allocation. The agencies that are funded in each annual action plan assist the city to meet priority needs, goals and objectives, and help to address the unmet needs of the homeless population. The successful outcome of funding public services is improving and increasing access of services for households in extreme poverty, and to address the needs of the homeless and for homeless prevention. The public services component, though small in funding, provides the greatest attainment of goals by the number of households served. The lack of CDBG funding is the greatest obstacle and barrier to achieving services to all people in need.

3. The jurisdiction must describe the specific planned action steps it will take over the next year aimed at eliminating chronic homelessness by 2016. Again, please identify barriers to achieving this.

(3) Response:

The City has a good working relationship with public services agencies and monitors their use of the CDBG funds. Any gaps in the delivery system are addressed in the discussion of homeless needs elsewhere in this document. The lack of funding is the barrier.

Action steps for program years 2016-2020 are to (1) Continue to assist with the annual Point In Time Homeless count, and to bring public awareness of the plight of the homeless particularly single men in the community. (2) City staff will assist with the movement forward of the development of a homeless shelter for men for extreme weather conditions in winter and in summer. The CDBG staff has worked with the Mayor's Homeless Task Force who have now registered as a Non-Profit and is known as the St. Charles Homeless Alliance. The Alliance will work closely with the Continuum of Care and City staff to seek private and public funding for the temporary shelter.

4 Homelessness Prevention—The jurisdiction must describe its planned action steps over the next year to address the individual and families with children at imminent risk of becoming homeless.

(4) Response: Homelessness Prevention is funded through CDBG public services agencies such as St. Joachim and Ann Care Services, and others to be identified in each funding cycle, to provide rent utility, mortgage assistance along with food, clothing, bedding, personal care items, school supplies, and other services that assist clients in extreme poverty and prevent them from becoming homeless. Many of the clients served through homeless prevention services are employed single mothers.

Action steps include participation in the St. Charles County Continuum of Care and to seek additional funding to assist public services in meeting the unmet needs of financially fragile families. In 2016 the City will also set aside 15% of the program income receipts to fund additional units of homeless prevention.

5. Discharge Coordination Policy—Explain planned activities to implement a cohesive, community-wide Discharge Coordination Policy, and how, in the coming year, the community will move toward such a policy.

(5) Response. Specific Homeless Prevention Elements:

All of the members of the Continuum of Care agreed that there are many people that take advantage of public services by obtaining aid from multiple agencies. They all agreed that in order to do more with less funds that they were going to have to track services using the same software in order to avoid duplication of services. Many of them were already aware of the mandate to use a HUD approved centralized software

The first step to implement a cohesive community-wide discharge and coordination policy was to implement the Homeless Management Information System (HMIS) for all Continuum of Care Partners. Our St. Charles Continuum is in the process of converting ROSIE, to the statewide HMIS. Much progress was made in 2015 to set up and implement the new HMIS software. The Community Council educated all agencies about the benefits of having the system. According the Community Council 100% of the Continuum of Care members are signed up to receive software user licenses. The Community Council also reached out to our non-HUD funded providers, many of whom agreed to participate. One of the difficulties or barriers these agencies reported was having to continuously train employees due to staffing turnover. Another difficulty was with data transfers and addressing the issues with their old legacy system. We anticipate continued progress through 2016.

The Continuum has four working subcommittees: The Homeless survey committee plans and conducts the point-in-time homeless count and maintains data on homeless services. The HMIS committee is working to implement the HIMS homeless tracking system. The Outreach and Engagement Committee is implementing the "First Step Back" program, a program to address basic needs and shelter for the chronically homeless. Finally, the Program Development committee is working to further develop the Continuum of Care. CDBG funds are used for homelessness prevention programs. The primary need for homelessness prevention is rental, mortgage, and utility assistance to prevent individuals and families from losing their homes.

The main barriers to achievement of goals is the lack of funding. Year after year we hear from our constituents, the members of the Continuum and our public services partners that there is an increase in the need for additional funds for the various programs that support our special needs populations and the general public. Even though the economy is no longer in decline, services are on the rise and St. Charles City, as a whole, faces a growing population in need with fewer resources to serve them.

Emergency Shelter Grants (ESG) RESPONSE: This section is not applicable. The City of St. Charles is not a State or recipient of ESG funds.

(States only) Describe the process for awarding grants to State recipients, and a description of how the allocation will be made available to units of local government.

Community Development

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

1. Identify the jurisdiction's priority non-housing community development needs eligible for assistance by CDBG eligibility category specified in the Community Development Needs Table (formerly Table 2B), public facilities, public improvements, public services and economic development.
2. Identify specific long-term and short-term community development objectives (including economic development activities that create jobs), developed in accordance with the statutory goals described in section 24 CFR 91.1 and the primary objective of the CDBG program to provide decent housing and a suitable living environment and expand economic opportunities, principally for low- and moderate-income persons.

*Note: Each specific objective developed to address a priority need, must be identified by number and contain proposed accomplishments, the time period (i.e., one, two, three, or more years), and annual program year numeric goals the jurisdiction hopes to achieve in quantitative terms, or in other measurable terms as identified and defined by the jurisdiction

1. Response:

Five Year Consolidated Annual Action Plans 2016-2020 Annual Action Plan 2016

The City's non-housing priority needs is to affirmatively further Fair 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, technical assistance. Affirmative Fair Housing efforts and remedies for discrimination in housing are supported by the following committees boards and commissions; Housing Task Force, Family Self Sufficiency Advisory Board, the St. Charles Housing Authority Board, City of St. Charles Citizen's With Disabilities Advisory Board, Senior Citizen's Advisory Board, Continuum of Care, the St. Charles Fair Housing Commission and the Human Relations Commission.

The City will work with agencies to provide the following actions to bring public awareness and education programs in 2016:

- Education on fair housing laws will be provided to housing providers, lenders, landlords, real estate agents, insurance agents, local governmental bodies, and the general public. The City will continue to provide, at a minimum two educational programs per year in 2016.,

The City will work with EHOC to investigate claims regarding fair housing discrimination and to conduct testing for housing discrimination.

- The City will provide community outreach by participating in grass-roots and community-based projects; working with academics, civil rights leaders, and the housing industry; by spreading the word about the Fair Housing Law. Spreading the word includes public service announcements, press releases, and distribution of material.

2. Response

Five-year Community Needs and Priorities

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

STRATEGIC PLAN

A. Time Period for the Plan: January 1, 2016 - December 31, 2016

PROGRAM GOAL ONE: PROVISION OF DECENT HOUSING

OBJECTIVES

Goal/Units of Service

Objective 1: Conserve and improve existing affordable owner housing through the Home Improvement Loan Program, removal of lead based paint hazards, installation of safety and security devices, and code enforcement activities	20-25 units per year 2012 - 2016
Objective 2: Support activities necessary to continue existing emergency shelter programs, and work to establish a homeless shelter in the city for single men	1 unit per year 2012 - 2016

PROGRAM GOAL TWO: PROVISION OF A SAFE AND LIVABLE ENVIRONMENT

OBJECTIVES

Goal/Units of Service

Objective 1: Increase the health and safety of low/moderate income neighborhoods through the Lead and Hazards Remediation Program	3-5 units per year 2012 - 2016
Objective 2: Increase access to decent affordable rental housing through code enforcement and by conducting health and safety inspections	125 Units per year
Objective 3: Improve substandard housing through the Home Improvement Program to provide loans or grant for minor to major home remodeling projects	20-25 units per Years 2016-2020

PROGRAM GOAL THREE: EXPANSION OF ECONOMIC OPPORTUNITIES

OBJECTIVES

Goal/Units of Service

Objective 1: Address the problems of teenage and disabled persons lack of economic opportunities through employment training and coaching	20 units per year 2012 - 2016
Objective 2: Continue to support workforce transportation and car pool programs	20 Units per year 2016-2020
Objective 3: Improve access to homeownership opportunities through HOME Funds	12 Units per year 2016-

Objective 4: Further Fair Housing through annual educational programs	2020 2 Units per year 2016-2020
Objective 5: Support agencies that aid homeless persons and persons at risk of becoming homeless to reduce the amount of homelessness in the City	50 units per year 2012 - 2016
Objective 6: Increase the number of handicapped accessible housing units through home improvement grants	5 units per year 2012 - 2016
Objective 7: Support special needs populations with services designed to help them remain in their homes or be able to move into homes	5 units per year 2012 - 2016

Performance Measurements:

The City of St. Charles has assigned performance measurements to all programs funded with CDBG. Measurements are based upon the outcome and objectives that are intended for each program. The three objectives are to create suitable living environments, provide decent affordable housing, and to create economic opportunities. Outcomes achieved within those objective include: availability/accessibility, affordability, and sustainability.

Providing Decent Housing: All CDBG assisted units in 2012 – 2016 will improve the affordability of decent housing. The provision of public service assistance will aid low to moderate income households who are acquiring, renting, or rehabilitating their homes which will also aid in some way to lift the clients assisted economically.

Public Services: All of the public services estimated funding amounts are based on the 15% spending cap of the annual CDBG allocation. The City is committed to fully using the allowable cap each year from 2012 - 2016. Grant awards will be based on the greatest need. Public Service Grants will be awarded to non-profit and faith based agencies that offer the following and meet the goals and objectives noted above.

Priority needs provided by services agencies to be funded with CDBG include:

- Public services to be provided to homeless and at risk populations and to aid homeless shelters;
- Mental Health Services to provide community and housing support, employment services and life skills training for persons who have a mental illness;
- Senior Programs to serve meals, either home delivered or congregate, to persons meeting low or moderate income guidelines that are 60 years and older;
- Youth Programs to provide employment and life skills training to youth aged out of foster care, and youth within a residential program, and emergency shelter for runaways;
- Transportation services for ill elderly, disabled, and work force transportation for persons with very low incomes;
- Food and clothing pantries. To provide food staples, clothing, bedding, household items to those who have been referred by the Family Services;
- Support for the Continuum of Care to provide solutions and to end chronic homelessness.

Antipoverty Strategy

1. Describe the actions that will be taken during the next year to reduce the number of poverty level families.

Action Plan 2016 Antipoverty Strategy response: Five Year Consolidated Plan 2016-2020

Antipoverty Strategy Response. The Anti-Poverty Strategy and efforts for the City of St. Charles to reduce the number of poverty level families in the City is accomplished primarily through other agencies.

For example the CDBG Administrator took actions to reduce the number of poverty level families by working with CDBG funded public service agencies, and a local faith based organization and helped to form the Neighbor Helping Neighbor Service Coalition (NHNSC). The coalition formed through the City of St. Charles School District. Among the initial 40 members working groups developed a System of Care Plan. The vision of the NHNSC is to bring comprehensive care to unstable low income families and individuals by creating smoother links between aid agencies and to provide support to the schools. NHNSC works with aid agencies to establish relationships with families with children enrolled in the schools.

The hope of NHNSC is to provide consistent supportive care over a long time period to break the cycle of low income families living from crisis to crisis. The NHNSC's System of Care Plan provides local innovative strategies that link assistance providers with public and private resources to enable participating families to increase earned income; reduce or eliminate the need for government and/or social service assistance; and make progress toward achieving economic independence. This goal will be achieved by the combined efforts and services of various local, private, and public resources.

During the development process, teachers and counselors expressed a need for a school resource system. We heard many stories about how children came to school without supplies, and many times without proper attire. Teachers told how they spent many hours looking for resources to help the families of these children and many times they went to the store on their own time to purchase items for these children with their own money.

Through private donations and volunteer help, each school was provided their own resource facility. A total of 10 schools within the City of St. Charles School District each have a school resource faculty that is kept fully stocked at all times by volunteer coordinators. The items stocked in these facilities include; school supplies, clothing, and personal care items. The CDBG Administrator is a member of the NHNSC Steering Committee and will continue to work with the volunteer organization through 2016.

The CDBG Administrator also works with the St. Charles Housing Authority (PHA) to develop services and activities for the Public Housing Family Self Sufficiency Program and act as a connector to other non-profit public services agencies to insure efficient service and to avoid duplication of service activities. Staff works closely with the Boys and Girls Club of St. Charles who offers after school mentoring and feeding programs for the children who reside at the Parkside Garden Apartments managed by the PHA which is within walking distance.

CDBG staff will work with Providence Bank to establish a financial literacy program to assist the unbanked, low-income and minority populations within the City of St. Charles. The goal

is to make banking products available and increase the financial literacy among the unbanked population. In addition to account access, credit repair and budgeting classes will be provided with the hope that this population will avoid predatory lenders that perpetuate poverty, such as, payday and car title loans, and pawn shops.

The Anti-Poverty Strategy for the City of St. Charles to reduce the number of poverty level families in the City is accomplished primarily through other agencies. The St. Charles Housing Authority has a Family Self-sufficiency program to raise families out of poverty through development of skills. Youth In Need operates the Head Start program in the City. Youth In Need also develops job and living skills for Cornerstone residents in order to help the youth in the program earn above poverty level wages. The Neighbor Helping Neighbor Service Coalition has a vision to end the cycle of families living in financial crisis.

Non-homeless Special Needs (91.220 (c) and (e))

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

1. Describe the priorities and specific objectives the jurisdiction hopes to achieve for the period covered by the Action Plan.
2. Describe how Federal, State, and local public and private sector resources that are reasonably expected to be available will be used to address identified needs for the period covered by this Action Plan.

1. Error! Reference source not found. Action Plan Specific Objectives response for Con Plan years 2016-2020: Public service programs funded with CDBG must benefit St. Charles residents whose income is no higher than HUD's definition of moderate income, (80% of median income). In order to target persons with the highest need including special needs populations and minorities, whenever possible, programs shall be limited to benefiting only low, (50% of median income) or very low, (30% of median income) income persons. Aid agencies are encouraged to focus programs on target populations which include, but are not limited to, abused children, battered spouses, homeless, elderly and frail elderly, minorities, non-English speaking residents, youth, residents of public assisted housing, substance abusers, and persons with disabilities (mental, physical, developmental, persons with HIV/AIDS and their families).

High Priority -

- Housing (i.e. homeless or foreclosure prevention, housing education services);
- Services for homeless individuals and families;
- Neighborhood safety (i.e. crime prevention);
- Food distribution;
- Child care;
- Job training;
- Transportation; and
- Anti-poverty programs that directly help reduce household financial burdens, including, rent, utility, and mortgage assistance on a limited basis, school supplies, medical needs, educational programs.

Medium Priority -

Youth activities & recreation programs (preferably age 13+);

- Financial literacy programs;
- Computer training & accessibility programs;
- Multi-cultural programs for youth and for seniors.

Priority needs services includes: Public services to be provided to homeless and at risk populations and to aid homeless shelters and to provide;

- Handicapped services to provide life skills training to help persons to remain in their homes;
- Health services to deliver an Outreach Program to provide courses in Community Disaster Education, First Aid/CPR, Water Safety and babysitting to low/moderate income residents;
- Mental Health Services to provide community and housing support, employment services and rehabilitation for persons who have a serious mental illness and who are low-income;
- Senior Programs to serve meals, either home delivered or congregate, to persons meeting low or moderate income guidelines 60 years and older;
- Youth Programs to provide employment and life skills training to youth aged out of foster care, and youth in a residential program, and emergency shelter for runaways;
- Transportation services for ill elderly, disabled, and work force transportation for persons with very low incomes;
- Crisis Care for children whose families are homeless/near homeless and/or trying to move from welfare to work;
- Food and clothing pantries. To provide food staples, clothing, bedding, household items to those who have been referred by the Family Services;
- Support for the Continuum of Care to provide solutions and to end chronic homelessness;

Outcomes = Benefits to participants during or after participating in the program. Outcomes typically relate to a change in conditions, status, attitudes, knowledge or behavior. This is not about how you will use funds, but how your client is better off after receiving the service. Examples:

- 5 youth will participate in a teen program, 2x per week for 33 weeks
- 2 housing forums will be provided
- 2 subsidized housing applications will be completed
- 10 households will avoid eviction and homelessness
- 15 mothers will receive classes in self-esteem, self-sufficiency and parenting
- 8 persons will be placed into permanent accessible housing
- 5 youth will transition to pre-school, day care or special needs education
- 32 one-way trips will be provided to senior citizens to medical appointments, shopping and other locations
- 10 persons will receive certification of having completed a first time homebuyer training
- 12 homeless persons will be connected with detoxification services
- 4 homeless persons will be connected to emergency shelter
- 7 persons will obtain a GED

2 Describe how Federal, State, and local public and private sector resources that are reasonably expected to be available will be used to address identified needs for the period covered by this Action Plan.

2. Response, Non-homeless Special Needs (91.220 (c) and (e))

The larger public services that receive CDBG funds such as Connections to Success, North East Community Action Corp (NECAC) and Sts Joachim and Ann Care Service also receive the following Federal, State, and local public and private sector resources.

Federal Funds:

US Dept. of Housing and Urban Dev.
HOME, CDBG, Sustainable Community Fund
Section * housing Program
US Dept. of Agriculture

Missouri State Funds:

Social Services/Family Support Division
Low Income Home Energy Assistance Program funds,
Emergency Crisis Intervention Program funds
Housing Dev Commission
Dept of Health and Senior Services
Shelter Care Plus
Commission on Human Rights
Emergency Shelter Grant

Local Government Funds:

CDBG Entitlement
City Council Directives
Mayor's Charity Golf, and County Mayor's Charity Ball
St. Charles County Community Resource Board
St. Charles County Indigent Fund
County Community Resource Board

Private Funds:

Neighborworks America
Federal Home Loan Bank of Des Moines IW
Emmerson Electric
Cuivre River
United Way,
Ridel Foundaton
Horizon Foundation
Jones Foundation
Walmart Foundation
Lutheran Foundation
IMPACT Group
Catholic Charities
St. Louis Archdiocesan Fund
Mercy Caritas
General public from private promotions and fund raising activities
Individual donations
In-Kind Services

Housing Opportunities for People with AIDS

RESPONSE: The City of St. Charles is not a recipient of HOPWA funds. The City of St. Charles Certifies that it will Affirmatively Further Fair Housing. Persons with AIDS or who are HIV positive will be assisted through various services provided through CDBG funding for public services agencies. The City does not ask the question of whether a person has any particular health condition and would not limit access to CDBG funding based on illness or disability.

Specific HOPWA Objectives

Describe how Federal, State, and local public and private sector resources that are reasonably expected to be available will be used to address identified needs for the period covered by the Action Plan.

Specific HOPWA Objectives response:

RESPONSE: The City of St. Charles is not a recipient of HOPWA funds. The City of St. Charles Certifies that it will Affirmatively Further Fair Housing. Persons with AIDS or who are HIV positive will be assisted through various services provided through CDBG funding for public services agencies. The City does not ask the question of whether a person has any particular health condition and would not limit access to CDBG funding based on illness or disability.

Include any Action Plan information that was not covered by a narrative in any other section.

Five Year Consolidated Plan FY 2016-2020 First Program Year Annual Action Plan 2016

Fair Housing:

Affirmatively Further Fair 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, technical assistance from and support from the Housing Task Force, Family Self Sufficiency Advisory Board, the St. Charles Housing Authority Board, 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 City of St. Charles completed an update to its Analysis to Impediments, (AI) to Fair Housing Study and will continue to address the needs listed in the update, and will provide more specific actions taken in 2015 in the CAPER and moving forward in Annual Action Plans 2016-2020. The City's Fair Housing Commission met and reviewed the 2011 AI and their consensus was that they did not necessarily agree with some of the EHOC recommendations in particular regarding changing the definition of family. The Fair Housing Commission will work with the Human Relations Commission and the Citizen's With Disabilities Advisory Board to help the City to address concerns that resulted from the AI study.

The U.S. Department of Housing & Urban Development (HUD) requires communities that receive Community Development Block Grant (CDBG) to conduct an Analysis of

Impediments to Fair Housing Choice study (AI) every three to five years when developing the CDBG Consolidated Plan to examine the impediments to fair housing choice. HUD further requires that impediments found be addressed in the jurisdictions Annual Action Plan through each year of the Consolidated Plan. All Action Plans and annual year end CAPERs (Consolidated Annual Performance Evaluation Report) must contain plans and/or actions taken by the jurisdiction through the programs years that addressed the impediments found in the AI.

The purpose of the AI was to analyze and eliminate housing discrimination within the City of St. Charles, to promote fair housing choices for all people; to provide opportunities for inclusive housing patterns; to promote housing that is accessible for persons with disabilities; and to foster compliance with the nondiscrimination provisions of the Fair Housing Act.

Early in 2011 CDBG Staff worked with the Purchasing Dept. and posted a Request for Proposals for professional services to update the City's AI. Metropolitan St. Louis Equal Housing Opportunity Council (EHOC) was the lowest and best bidder and was awarded the contract. EHOC was awarded the contract to update the AI in 2011. The other proposal received was from University of Missouri St. Louis Public Policy and Research.

In 2016 the city will again solicit professionals and work toward an update of the AI to coincide with the next five year Consolidated Plan 2017-2021.

Background for EHOC:

The Metropolitan St. Louis Equal Housing Opportunity Council (EHOC) seeks to ensure equal access to housing for all people through education, counseling, investigation and enforcement.

EHOC is funded through grants from

- The U.S. Department of Housing & Urban Development
- City of St. Louis Community Development Agency
- St. Louis County Community Development Block Grant

EHOC is the only private, not-for-profit fair housing enforcement agency working to end illegal housing discrimination in the Metropolitan St. Louis Region. They operate throughout Missouri and Illinois. EHOC fights illegal housing discrimination through:

- Education on fair housing laws for housing providers (lenders, landlords, real estate agents and insurance agents), local governmental bodies (those who should be concerned about the affects of discrimination in their communities) and the general public (especially those who are most likely to experience illegal discrimination); and
- Enforcement actions against those they find, through their investigative measure, to discriminate illegally; and
- Community outreach by participating in grass-roots and community-based projects; working with academics, civil rights leaders, and the housing industry; and spreading the word about their services and message through public service announcements, press releases, distribution of material.

Anita Teikamp, CDBG Administrator, met with Metropolitan St. Louis Equal Housing Opportunity Council, (EHOC) Eric Kohring, Fair Housing Accessibility Specialist, Elisabeth Risch, Bank Specialist, and Will Jordan, President to develop a plan to address the impediments found in the AI.

The following items were discussed along with plans to implement strategies to improve or eliminate the impediments to fair housing choice found in the 2011 Analysis of Impediments to Fair Housing Choice Study (AI):

V. FAIR HOUSING IMPEDIMENTS BEGINNING ON PAGE 27 OF THE AI

Plan to Address Impediments to Fair Housing to be included as a Planning Document to be included with the 5 Year Con Plan with the following actions to occur in 2014.

Impediments Found in Rental Housing

1. A. Rental Discrimination Persists:

Persistence of rental housing discrimination: Based on testing of discriminatory practices and the number of complaints filed for disability discrimination, a sentiment still exists that it is okay to treat people differently because of their protected class.

EHOC Recommendation to Address Rental Housing Impediments:

City should continue to support testing efforts in rental housing throughout the Consolidated Plan cycle and should share testing results with members of the Fair Housing Commission, Human Relations Commission and Citizens with Disabilities Advisory Board.

City Response: City will continue to support testing in rental housing throughout the Consolidated Plan Years One through Five. City will contract with a professional service agency and/or EHOC for testing services, for the provision of quarterly testing once every four months for a cost per year of approximately \$2,500 to be paid with CDBG funds.

Provide fair housing educational programs to those rental landlords found through testing to be demonstrating discriminatory practices, for an estimated cost of \$2,500 to be paid with CDBG funds.

EHOC Recommendation to Address Rental Housing Impediments:

Continue its efforts to combat prejudices through its Human Relations Commission, Fair Housing Commission and Citizens with Disabilities Advisory Board. These commissions should have training on fair housing to ensure that they are aware of the law.

City Response: CDBG funds will be used to provide training for the boards and commissions noted above on an annual basis for every year of the Consolidated Plan 2016-2020. The boards and commissions will also be invited to attend the Annual Fair Housing Conference sponsored by EHOC, cost of which will be provided by CDBG funds.

EHOC Other Recommendations: Continue to provide a minimum of (2) Fair Housing Educational Programs per Year and recommended providing workshops aimed at reaching target groups and existing meetings such as provide relevant

speaker to present at a staff or consumer meeting of a center for independent living, or a homeless services program.

Open fair housing workshops aimed at attracting community residents usually have low participation rates, so instead, we recommend that workshops aimed at reaching community residents target existing groups and meetings. For example, the City could send a fair housing speaker to present at a staff or consumer meeting of a center for independent living, or a homeless services program.

City Response: The City Ordinance set forth to establish the Fair Housing Commission states that the Commission shall hold 2 educational events per year. CDBG staff have coordinated two fair housing educational events per year for the past several years. CDBG funds will be used to continue to provide a minimum of two educational events per year through each program year 2016-2020, as recommended by EHOC.

The CDBG staff will work with non-profits public services agencies funded by CDBG to cover a portion of the cost for fair housing training. CDBG public services agencies may be required to set aside a small portion of their sub-recipient grants to help defer the cost for training. One of the events per year may address the fair housing laws protecting those with disabilities and or for those that are homeless.

Provide fair housing education in 2014. Provision of presentation by EHOC to city.

To provide a program presented by EHOC targeted to realtors, landlords/investors and lenders through the St. Charles Association of Realtors. A program is under consideration at this time by the newly elected chapter president.

B. Update to Zoning Code are Recommended to Ensure Equality for all Families and for Persons with Disabilities

The review of the city's zoning code completed as part of this AI study turned up several issues that may have an impact on persons with disabilities and on nontraditional families. Failure to correct these issues may leave the city open to claims of discrimination based on gender/sex or on disability/handicap.

EHOC Recommendation: The city should consider broadening its definition of "family" so that same sex couples will have the same rights to live with their children and dependents in a single family home as opposite sex couples. The City should consider adopting one of the Moderate Ordinances developed by the Real Families Campaign (listed in page 31 of the AI), or revising its current definition to allow unmarried couples that have more than two dependents to reside in a single family dwelling, with the same occupancy restrictions that would be in place of married couples with dependents.

City Response: The Department of Community Dev staff will need time to consult with the following departments to insure that the EHOC Recommendation noted above is feasible; Office of Mayor, Department of Administration, and the City Attorney. Moving forward the City will take this recommendation under advisement

and report the status and results in subsequent Annual Actions plans and in the Consolidated Annual Performance and Evaluation Reports.

EHOC Recommendation: The City should modify its zoning code by ensuring that a group home for recovering drug addicts or alcoholics meets the city's definition of a "group living arrangement," rather than being considered a "boarding home."

City Response: The Department of Community Dev staff will need time to consult with the following departments to insure that the EHOC Recommendation noted above is feasible; Office of Mayor, Department of Administration, and the City Attorney. Moving forward the City will take this recommendation under advisement, and report the status and results in subsequent Annual Actions plans and in the Consolidated Annual Evaluation Reports.

EHOC Recommendation: The City should modify its zoning code to ensure that group living arrangements may be allowed in area zoned for manufactured housing/mobile home parks.

City Response: The Department of Community Dev staff consulted with the following departments to insure that the EHOC Recommendation noted above was feasible; Office of Mayor, Department of Administration, and the City Attorney. The City will took the recommendation under advisement and changed the zoning code to allow for group homes, and reported the progress and results in subsequent Annual Actions plans and in the Consolidated Annual Performance and Evaluation Reports.

C. Mortgage lending disparities continue to exist, particularly for African Americans, Hispanics and American Indians

EHOC Recommendation: St. Charles should adopt a local Community Reinvestment Act (CRA) policy to ensure that municipal deposits are held by banks that have excellent CRA and fair lending records. The City should make lenders aware that it will examine their CRA performance evaluation ratings, and any complaints against lenders, in order to facilitate decisions about deposits. The City can access detailed information on lenders' CRA performance ratings through the Federal Financial Institutions Examination Council.

City Response: The Department of Community Dev staff will need time to consult with the following departments to insure that the EHOC Recommendation noted above is feasible; Office of Mayor, Department of Administration, and the City Attorney. Moving forward the City will take this recommendation under advisement, and report the status and results in subsequent Annual Actions plans and in the Consolidated Annual Performance Evaluation Reports.

CDBG staff has met with several banks to obtain feedback for the idea of forming a coalition to address the unmet needs of the unbanked, low-income and minority populations within the City of St. Charles. The goal is to assist and encourage coalition members to commit to making banking products available and increasing financial literacy within the unmet needs community.

D. Lack of construction of new multifamily housing is slowing development of new accessible housing in St. Charles

EHOC Recommendation: St. Charles should continue to support accessibility modifications through its home Improvement Loan Program and Accessibility Grant.

City Response: The City plans to continue to support accessibility modifications through its home Improvement Loan Program and the Accessibility Grant. The Annual Action Plan Goal for 2014 is to assist (5) households with accessibility modifications. The City has signed HUD Form 20911 for Certification with the CDBG Consolidated Plan 2012 – 2016 for the West Clay Senior Living. An affordable housing development for persons with incomes at or less than 50% of the Area Median Income. The developer has applied for MHC Tax Credits from the Mo. Housing Dev. Commission and agreed to set aside (5) affordable accessible units for persons with 60% AMI or less that have disabilities.

EHOC Recommendation: The Citizens with Disabilities Advisory Board should consider whether a Visitability Ordinance may improve the supply of accessible housing in St. Charles. A sample Visitability Ordinance is attached in Appendix VI.

City Response: The City will work with the Citizens with Disabilities Advisory Board to consider adopting a Visitability Ordinance. The City of St. Charles is in the process of creating a comprehensive ADA sidewalk transition plan. The plan is mandated by Title II of the American with Disabilities Act. The plan will include an inventory of all existing sidewalks and curb ramps on City right-of-way and provide guidance on future construction needs to make the City accessible to all citizens. This survey was created to get public input on the pedestrian routes and travel habits.

The Department of Community Dev staff will need time to consult with the following departments to insure that the EHOC Recommendation noted above is feasible; Office of Mayor, Department of Administration, and the City Attorney. Moving forward the City will take this recommendation under advisement, and report the status and results in subsequent Annual Actions plans and in the Consolidated Annual Performance and Evaluation Reports.

E. Racial/Ethnic Segregation, While Declining, Still Persists

EHOC Recommendation: St. Charles should work with the St. Louis HOME Consortium to examine the feasibility of a consortium-wide program to offer incentives to participants in the First Time Home Buyer Program who move to areas in where they are racially underrepresented. The program could be moderated on the successful efforts of Shaker Heights, Ohio's Fund for the Future to support integration. St. Charles should send a written letter regarding the proposal to the consortium. A detailed proposal could be developed by consulting with the Shaker Heights Fund for the future or a private consultant. It is essential that this type of program not be confined to the city of St. Charles, or to St. Charles County, but that jurisdictions that have predominately minority areas or populations be included along with those with a predominately white composition. By partnering together, prospective homebuyers of any race will have the opportunity to obtain incentives by moving into neighborhoods in which their racial/ethnic group is underrepresented. See Appendix V of the AI for details.

City Response: The Department of Community Dev staff will need time to consult with the following departments to insure that the EHOC Recommendation noted above is feasible; Office of Mayor, Department of Administration, and the City Attorney, as well as St. Louis County HOME Consortium. Moving forward the City will

take this recommendation under advisement, and report the status and results in subsequent Annual Actions plans and in the Consolidated Annual Performance and Evaluation Reports.

The U.S. Department of Housing and Urban Development (HUD) provides Federal funding to the City of St. Charles for its housing and community development programs through the Community Development Block Grant (CDBG) and the HOME Investment Partnership Program (HOME) through membership in the St. Louis HOME Consortium, and for Neighborhood Stabilization Program, (NSP), from Missouri Depart. Of Economic Dev, Emergency Shelter Grant and Homeless Challenge Grant a pass thorough from the Missouri Dept. of Family Services. Some of the CDBG funds are further granted to providers of services for housing benefiting low- and moderate-income persons. These entities are known as sub-recipients. Entitlement communities, like St. Charles, must affirmatively further fair housing (AFFH) as a prerequisite to receiving these federal funds. Affirmatively further fair housing in this context means that the City of St. Charles must prepare and update every three to five years an analysis of impediments to fair housing study, a plan to address these impediments, and maintain records of background information and its fair housing activities.

Fair housing is having the choice to live where you want and where you can afford without the fear or threat of discrimination. Discrimination, in this sense, is any housing practice or action that is unlawful under Title VIII of the Civil Rights Act of 1968, as amended. Title VIII, commonly referred to as the Fair Housing Act, specifically provides that "...no person shall be subjected to discrimination because of race, color, religion, sex, handicap, familial status, or national origin in the sale, rental, or advertising of dwellings, in the provision of brokerage services, or in the availability of residential real estate-related transaction

Project Design Factors

Design Projects for Compliance with the Principles of Affirmative Action, Fair Housing, and Civil Rights. The City of St. Charles will identify project activities that should be designed to include the protected classes. As set forth in all relevant laws. Other compliance areas, such as environmental regulations and labor standards, have adopted procedures that are effective after grant award. In the area of civil rights nondiscrimination and affirmative action efforts taken outside of actual project implementation is also considered. Activities funded through the Community Development Block Grant, Neighborhood Stabilization Program, Disaster Recovery Grant, HOME Fund, Emergency Shelter Grant, Homeless Challenge Grant and CDBG-Recovery must be designed in accordance with fair housing/civil rights laws.

The primary objective of the fair housing/civil rights laws that apply to the City of St. Charles Programs is to ensure that activities are conducted in a manner that will not cause discrimination on the basis of race, creed, color, national origin, ancestry, sex, marital status, age, lawful source of income, familial status, physical or mental disability, age, or sexual orientation. Affirmative action to redress past discriminatory practices is also targeted when City of St. Charles Program funds are involved. All sub-recipients will be expected to make measurable efforts to fulfill these objectives and should address such efforts in its application for funding, as applicable.

In addition, sub-recipients who receive CDBG or other related grant funds must affirmatively further fair housing. Provisions to affirmatively further fair housing are principal and longstanding components of the U.S. Department of Housing and Urban Development's (HUD) housing and community development programs. These provisions flow from the mandate of Section 808(e)(5) of the Fair Housing Act, which requires the

Secretary of HUD to administer the Department's housing and urban development programs in a manner to affirmatively further fair housing. For further information see, HUD's Fair Housing Planning Guide at p. 1-1, <http://www.hud.gov/offices/fheo/images/fhpg.pdf>

The City and its sub-recipients will be expected to make measurable efforts to fulfill these objectives during the course of each grant year funded.

Design Projects That are Nondiscriminatory

The principals of nondiscrimination must be incorporated into the planning and design of all federal and state funded activities. The sub-recipients will be monitored to ensure that they do not engage in exclusionary or discriminatory practices.

Special care will be taken to ensure that public facilities or improvements are not designed to exclude anyone in the protected classes. Discrimination in public facilities might include denying or restricting access to facilities, services, or benefits; or might involve providing segregated facilities, services, benefits, or treatment.

The only exception allowed would be for construction or rehabilitation of elderly/senior (persons 55 years and older) centers, which by their nature, limit services to a certain age group, provided that other protected classes are not limited within the elderly demographic. Projects involving work on any other type of facility will only be funded if at least a portion of the services is opened to all citizens, including protected classes.

The City of St. Charles affirms its commitment to wherever possible incorporate the Principles of Affirmative Action. When planning for and selecting program activities, the City will give consideration to overcoming the effects or conditions that have limited or excluded participation by members of protected classes. In designing activities, there are a number of affirmative methods that will be employed to redress past discrimination and to encourage inclusion in the future.

Public improvements can be targeted to areas or populations that have historically been ignored due to income, minority status or other factors. Examples of such efforts might be to install sidewalks in a minority neighborhood that has traditionally been overlooked, or to renovate public buildings to make them accessible to persons with disabilities. Target areas for residential rehabilitation might be chosen based upon minority population, rather than age of the housing stock alone. Although such locations are voluntary, the City will give them consideration. Activities of this kind will be considered among the City's fair housing/civil rights efforts. The City will include any documentation to indicate that the project has been designed to redress discrimination. This may include maps, studies, or correspondence, and should demonstrate the City's sensitivity to correcting and avoiding inequalities.

Every sub-recipient who receives a grant is required to affirmatively further fair housing even if they were awarded funding for a project that does not involve housing related activities. As HUD itself stated in its Fair Housing Planning Guide:

What is Fair Housing: Having the choice to live where you want and where you can afford without the fear or threat of discrimination.

The following citizen's advisory boards have been established to recommend public policy and procedures to the Mayor and City Council insure that all St. Charles City residents are included and can participate in all aspects of community life. These advisory boards also act as advocates and educators to persons within the protected classes and beyond. All

meetings of the Boards and Commission shall comply with the state open meetings law and the city's applicable law and regulations concerning open meetings.

Each meeting agenda includes the following statement: St. Charles City Hall is wheel chair accessible. Those in need of auxiliary aids should contact the City sufficiently in advance to assure that accommodations may be made. For the hearing impaired, City Hall can be contacted on the TTY/TDD system by calling (636) 949-3289. If you need any accessible materials, delivery formats, or language translations regarding this agenda **please call Anita Telkamp at (636) 949-3224.**



The City of St. Charles established the Fair Housing Commission. The Commission Policy is set forth in City Ordinance Chapter §94 Section 94.01 – 94.08. It is declared to be the policy of the city, in the exercises of its police power for the protection of the public health, safety and general welfare, for the maintenance of business and good government, and for the promotion of the city's trade, commerce and manufacture, to assure equal opportunity to all persons to live in housing facilities regardless of race, color, creed, religion, ancestry or national origin, handicapped status, familial status, sex, or public assistance recipient status, and to that end to prohibit discrimination in housing.

The Citizen With Disabilities Advisory Board §33.240 – 33.264. (A) The Advisory Board shall advise the Mayor, City Council and city administration as to all matters relating to the welfare of citizens with disabilities residing in the city. (B) The Board shall on a continuing basis, recommend to the Mayor, City Council and city administration action to be taken to remove impediments to citizens with disabilities, such as architectural, communication and transportation barriers. (C) Shall on a continuing basis, recommend action which will enable citizens with disabilities residing in the city to participate in all aspects of community life in accordance with their abilities.

The Senior Citizen Advisory Commission §33.270. Its purposes and objectives are: (A) To promote Senior Citizen involvement in governmental affairs. (B) To advise the City Council and Mayor on the following areas: education, cultural development, leisure activities, social concerns and any other issues as they may arise.

The Board of Commissioners of the City Housing Authority §33.217. (B) The City Council has also found and does now find, determine and declare that unsanitary and unsafe inhabited dwelling accommodations exist in the city and that there is a shortage of safe and sanitary dwelling accommodations in the city available to persons of low income at rentals they can afford, and that there is need for a housing authority in the city.

The Youth Advisory Commission §33.235 (A) To promote youth involvement in governmental affairs. (B) To advise the City Council and Mayor on areas concerning education, cultural development, leisure activities, social concerns and any other issues requested by the Council and Mayor.

Human Relations Commission §33.320.

(A) The mission of the Human Relations Commission is to promote respect, harmony and understanding throughout the St. Charles community.

(B) The vision of the Commission is an equal-opportunity community in which all persons respect one another, and give and receive fair treatment.

(1) Goals of the Commission include, (a) promote mutual understanding and respect among all social, racial, religious, cultural and ethnic groups in the community.

- (b) Endeavor to eliminate prejudice among various groups in the community and create harmonious relationships among citizens, groups, agencies and departments within the city.
- (2) The objectives of the Commission are:
 - (a) Plan activities or programs that increase understanding and respect among all residents of the city.
 - (b) Establish relationships and encourage dialogue with diverse groups within the community, to identify and address tensions that may arise.
 - (c) Provide methods and resources for citizens to take concerns and complaints related to discrimination in employment, public accommodation and housing; or related to bias incidents and hate crimes motivated because of race, color, religion, national origin, sex, sexual orientation or disability of the victim.
 - (d) Facilitate mediation services as needed in the community.
 - (e) Support efforts by law enforcement agencies, community groups, and educational institutions to collect and review data related to the following, and serve as repository for such data:
 - 1. Patterns of discrimination and hate crimes.
 - 2. Issues of civil rights and human rights.
 - 3. Community relations efforts within the city.
 - (f) Support the continued assembly and dissemination of pertinent data, studies and programs for the purpose of:
 - 1. Promoting best practices to improve human relations.
 - 2. Providing training materials that may be used by civic or religious organizations, educational institutions, law enforcement agencies, business and others to prevent unfair treatment and encourage harmonious relations.
 - 3. Disseminating such information and research as, in its judgment, will promote good will and minimize or eliminate discrimination in the city.
 - 4. Measuring the effectiveness of programs established to educate the citizens of St. Charles in human relations issues and action.

Internal Operation.

- (A) Advise and consult with the Mayor and City council on matters involving discrimination.
- (B) Study, advise and make recommendations for legislation, policies, procedures and practices of the City and other public entities, as are consistent with the purposes of this chapter.



City of St. Charles, Missouri

And

Saint Louis

COUNTY
MISSOURI

ST LOUIS COUNTY HOME CONSORTIUM

AFFIRMATIVE FAIR HOUSING MARKETING PLAN AND PROCEDURES

I. STATEMENT

This Affirmative Fair Housing Marketing Plan and Procedures ("Marketing Plan") is developed for use with the City of St. Charles, Community Development Block Grant (CDBG), Neighborhood Stabilization Program Grant (NSP), and HOME Investment Partnership ("HOME") Program and CDBG, NSP and HOME-funded projects in accordance with the CDBG, NSP and HOME Program regulations, including but not limited to 24 CFR 570.201, 570.260, and 92.351, of the U.S. Department of Housing and Urban Development ("HUD") regulations. The CDBG, NSP, and HOME Programs has established procedures to affirmatively market all projects resulting in five (5) or more assisted housing units. The Plan is a commitment of the City of St. Charles and St Louis County's HOME Consortium ("the Consortium"), City CDBG/NSP staff and Consortium staff, and the HOME-funded participant ("Grantee") to affirmatively further Fair Housing. The CDBG, NSP and HOME Grantee shares responsibility with the Consortium in informing the public about the Federal Fair Housing laws, soliciting eligible persons without regard to race, color, national origin, sex, sexual orientation, source of income, religion, familial status, or disability into the affordable housing market and evaluating the effectiveness of these marketing efforts. Affirmative marketing differs from general marketing activities because it specifically targets potential tenants and home buyers who are least likely to apply for and/or purchase housing. Efforts are made to make these persons aware of the available affordable housing. This Marketing Plan is a guide to assist the City of St. Charles and St. Louis County's HOME Consortium and its grantees by summarizing the affirmative marketing procedures required by HUD.

This Plan is documented and maintained in the Office of Community Development City of St. Charles and at St Louis County files, and shall be included by reference in all CDBG, NSP and HOME project proposals, made an integral part of all CDBG, NSP HOME and CHDO funding agreements CDBG, NSP, and HOME case files. The Grantee is held to the terms of the Marketing Plan by the requirements in the applicable HOME or Community Housing Development Organization ("CHDO") agreement.

II. PURPOSE

In accordance with the regulations of the HOME Program and in furtherance of the Consortium's commitment to non-discrimination and equal housing opportunity, the Consortium establishes procedures to affirmatively market the distribution of its annual HOME allocation and housing units acquired, constructed or rehabilitated under the HOME Program and so for activities of the CDBG and NSP programs.

It is the Affirmative Marketing Policy of the Consortium to assure that individuals who normally might not apply for available housing units because they are socially and/or economically disadvantaged:

- be informed of available housing units
- be encouraged to apply for available housing units
- have an equal opportunity to rent/own their own housing units

III. METHODS TO DISSEMINATE AFFIRMATIVE FAIR HOUSING MARKETING REQUIREMENTS:

The City and Consortium will use the following methods to inform the public, potential tenants, potential homeowners, potential and existing for-profit developers, and potential and existing non-profit developers, and local units of government about Federal Fair Housing laws and Affirmative Fair Housing Marketing Plan and Procedures.

- A. The County HOME Consortium staff shall be responsible for implementing the Marketing Plan and evaluating its effectiveness as required by the HOME Program.
- B. The Consortium shall inform the community about its Affirmative Marketing Policy through periodic updates at public forums. Fair Housing meetings as well as training workshops with its HOME and CHDO grantees or other similar forums.
- C. At the time of HOME funding for rental housing development, the Consortium will provide the Grantee with copies of Fair Housing for Home Seekers, Your Rights and Fair Housing for Home Providers, Your Responsibilities. The Grantee shall provide initial tenants and rental property owners with copies of these brochures.
- D. The Consortium will continue to provide general information and telephone reference numbers to persons contacting the County Office of Community Development with questions regarding Affirmative Marketing and Federal Fair Housing laws.

IV. CONSORTIUM AFFIRMATIVE MARKETING REQUIREMENTS

The City and Consortium will, at least annually, adhere to the following, or similar, Marketing Plan policies regarding announcement of availability of HOME funds and including CDBG and NSP programs and funds:

- A. Maintain a notice of CDBG and HOME funding availability on the city and/or County's website.
- B. Establish and maintain a database of potentially qualified for-profit and non-profit developers and e-mail invitations to apply for funding.
- C. E-mail an invitation to apply for funding to all Consortium members participating in the County HOME Consortium.
- D. E-mail notices of available funding to housing counseling agency and CHDO distribution lists.

V. CONSORTIUM REQUIRED AFFIRMATIVE MARKETING RECORD KEEPING

In order to verify that the Consortium is following Marketing Plan requirements the following record keeping procedures will be required:

- A. The Consortium will maintain records of how HOME funding availability was advertised (copies of advertisements, e-mails, etc.).
- B. Copies will be maintained of all training materials and meeting agendas where the Consortium's Affirmative Marketing Policy was discussed.

The City of St. Charles shall also follow the CDBG and NSP Regulation requirements.

VI. GRANTEE AFFIRMATIVE FAIR HOUSING MARKETING REQUIREMENTS

Each Grantee using Consortium HOME funds must adhere to the following Marketing Plan policies when HOME-assisted housing units become available for rent or purchase:

- A. Incorporate an Equal Housing Opportunity statement or logo in any correspondence associated with rental or home ownership opportunities developed with the use of Consortium HOME funds.
- B. All marketing of HOME-assisted housing will be jurisdiction-wide and all advertising will be placed in sources of wide circulation. All ads must contain an Equal Housing Opportunity statement or logo.
- C. Media sources should include advertisement to a particular audience (e.g., newspapers or radio stations that serve protected classes).
- D. All advertisements, brochures, and other written materials should be published in at least English and one other language (ie: Spanish), in order to reach non-English speaking audiences and displayed.
- E. Contact should be made with organizations whose membership or clientele consists primarily of protected class members.
- F. Notify the Public Housing Authority or Authorities in the county in which units are located when HOME-assisted units are available for rent or purchase.
- G. The project owner must display the Equal Opportunity logo and Fair Housing poster in an area accessible to the public (e.g., rental office).

VII. GRANTEE REQUIRED AFFIRMATIVE MARKETING RECORD KEEPING

In order to verify that Consortium Grantees are following Marketing Plan, the Consortium requires the following record keeping procedures will be required:

- A. Grantee maintains records of how vacancies were advertised (copies of advertisements, etc.).
- B. Copies of all brochures, leaflets, and letters to community contacts shall be maintained in an easily accessible file.
- C. Grantee shall have a written policy that outlines how all applications will be reviewed and processed. Grantee records should show how all completed and filed applications were processed including whether an applicant was accepted or unaccepted and why an applicant was not accepted.
- D. Maintenance of information on the race, sex, ethnicity, and whether the applicant is disabled for all applicants, home buyers, and tenants. The Consortium will have the Grantee submit this information on at least an annual basis to coincide with the

- Consortium's submission of its Consolidated Annual Performance and Evaluation Report ("CAPER").
- E. To facilitate collection and reporting of the required data, the Grantee shall fill out and maintain form HUD-935.2 *Affirmative Fair Housing Marketing Plan* (see Attachment A).

This information will be gathered when an application is taken for either a tenant or a home buyer and information will be maintained during the entire affordability period. Grantees must provide a copy of advertisement and marketing material to OCD.

VIII. CONSORTIUM ASSESSMENT OF ITS AFFIRMATIVE MARKETING POLICY

The following actions will be taken by the Consortium to evaluate the success of its Affirmative Fair Housing Marketing Policy and that of its Grantees:

- A. The Consortium will assess the results of its Affirmative Fair Housing Marketing Plan annually with a summary of "good faith efforts" taken by the Consortium as well as its Grantees in the CAPER.
- B. The Consortium will compare the information compiled in the manner described under Section V and Section VII above and evaluate the degree to which statutory and policy objectives were met. If the required steps were taken, the Consortium will determine that good faith efforts have, in fact, been made.
- C. To determine results, the Consortium may examine whether specific groups in the Consortium's service area applied for or became tenants or owners of HOME- or CHDO-funded units that were affirmatively marketed. If the Consortium finds that specific groups are represented, particularly Hispanics, African Americans, Asians, American Indians, persons with disabilities, and women, the Consortium will assume that the Marketing Plan procedures were effective. If one or more groups are not represented within the context of existing neighborhood composition, the Consortium will review its procedures to determine what changes, if any, might be made to make the affirmative marketing efforts more effective.
- D. The Consortium will take corrective action if it is determined that a Grantee has failed to carry out Affirmative Marketing efforts as required. If a Grantee continues to neglect responsibilities made incumbent by the terms of the HOME or CHDO Agreement, the Consortium will consider taking one or both of the following actions:
 - 1. Declare the Grantee disqualified from any further assistance made available under the HOME Program.
 - 2. Notify the Grantee of the HOME Program funds that were in violation of the terms of the HOME or CHDO Agreement and the Consortium may exercise its right to require immediate repayment of the HOME funding.
- E. The Consortium will not proceed with corrective action without allowing time and effort by staff to counsel the Grantee in accordance with the terms of the HOME or CHDO Agreement.

Fair housing is having the choice to live where you want and where you can afford without the fear or threat of discrimination. Discrimination, in this sense, is any housing practice or action that is unlawful under Title VIII of the Civil Rights Act of 1968, as amended. Title VIII, commonly referred to as the Fair Housing Act, specifically provides that "...no person shall be subjected to discrimination because of race, color, religion, sex, handicap, familial status, or national origin in the sale, rental, or

advertising of dwellings, in the provision of brokerage services, or in the availability of residential real estate-related transactions...” .

In addition to the Federal fair housing law, Title 162 WAC, Commission on Human Rights, as amended, of the Missouri Code, similarly seeks to “...secure for all individuals within the state freedom from discrimination because of race, color, religion, sex or national origin, in connection with... real property transactions...”. This same citation also prohibits “...discrimination because of disability in real property transactions...”.

Office for Civil Rights - Headquarters and Regional Addresses

- Send the complaint to the appropriate OCR Regional office or OCR headquarters.
- Address inquiries to the OCR Regional Manager.
- Contact the OCR regional office for your State or Territory, or the headquarters office for further information.

HUD's Title VIII Fair Housing Complaint Process

Your fair housing rights are protected under Title VIII of the Civil Rights Act of 1968 (Fair Housing Act). If those rights have been violated, you can file a complaint with HUD. Here is how the process works:

Step 1 - Intake

1. Anyone can file a complaint with HUD at no cost. Fair housing complaints can be filed by any entity, including individuals and community groups. Those that file fair housing complaints are known as complainants. Those against whom fair housing complaints are filed are called respondents.
2. Fair housing complaints can be filed with HUD by telephone (1-800-669-9777), mail, or via the Internet. Follow this link to fill out a fair housing complaint form [online](#).
3. After HUD has received the initial information, an intake specialist will contact the complainant and interview him or her to collect facts about the alleged discrimination. Initial interviews are normally conducted by telephone. The intake specialist will then review the allegations to determine whether the matter is jurisdictional.
4. If HUD has the authority to investigate, it will file the complaint. If the allegations do not fall within HUD's jurisdiction, for example if the complaint does not allege housing discrimination, HUD cannot accept the complaint and must close the case.
5. If the alleged discrimination occurred within a state or locality in HUD's Fair Housing Assistance Program*, HUD will refer the complaint to that agency. That agency must begin to work with the complainant within 30 days, or HUD can take the complaint back.

**All the agencies in the Fair Housing Assistance Program have laws that are substantially equivalent to the federal Fair Housing Act.*

Step 2 - Filing

1. If HUD accepts the complaint for investigation, the investigator will draft a formal complaint on HUD's standard form and provide it to the complainant, typically by mail. The complainant must sign the form and return it to HUD.
2. Within 10 days after receipt of a signed complaint, HUD will send the respondent notice that a fair housing complaint has been filed against him or her along with a copy of the complaint. At the same time, HUD will send the complainant an acknowledgement letter and a copy of the complaint.
3. Within 10 days of receiving the notice, the Respondent must submit to HUD an answer to the complaint.

Step 3 - Investigation

1. As part of the investigation, HUD will interview the complainant, the respondent, and pertinent witnesses. The investigator will collect relevant documents or conduct onsite visits, as appropriate.
2. HUD has the authority to take depositions, issue subpoenas and interrogatories, and compel testimony or documents.

Step 4 - Conciliation

1. The Fair Housing Act requires HUD to bring the parties together to attempt conciliation in every fair housing complaint. The choice to conciliate the complaint is completely voluntary on the part of both parties. Any conciliation agreement signed by HUD must protect the public's interests.
2. If the parties sign a conciliation agreement, HUD will end its investigation and close the case. However, if either party breaches the agreement, HUD can recommend that the U.S. Department of Justice (DOJ) file suit to enforce the agreement.

Step 5 - No Cause Determination

1. If, after a thorough investigation, HUD finds no reasonable cause to believe that housing discrimination has occurred or is about to occur, HUD will issue a determination of "no reasonable cause" and close the case.
2. A complainant who disagrees with that decision can request reconsideration of the case by sending a letter to the Director of the Office of Enforcement, FHEO, 451 7th Street, SW, Room 5214, Washington, DC 20410.

3. Upon receipt of a request for reconsideration, HUD will notify all of the parties that the request has been received and invite them to submit any additional evidence pertinent to the investigation.

4. HUD will review all of the materials from the investigation and any additional evidence that the parties provide.

5. HUD will then inform the parties if the Department has affirmed its finding of "no reasonable cause" or instead has decided to re-open the complaint. If HUD decides to re-open the complaint, it will resume investigation and conciliation. If HUD affirms its finding of "no reasonable cause", HUD can take no further action on the complaint.

6. If the complainant disagrees with HUD's determination that there was no reasonable cause to believe that discrimination occurred or was about to occur, the complainant can file a civil court action in the appropriate U.S. district court.

Step 6 - Cause Determination and Charge

1. If the investigation produces reasonable cause to believe that discrimination has occurred or is about to occur, HUD will issue a determination of "reasonable cause" and charge the respondent with violating the law. HUD will send a copy of the charge to the parties in the case.

2. After HUD issues a charge, a HUD Administrative Law Judge (ALJ) will hear the case unless either party elects to have the case heard in federal civil court. Parties must elect within 20 days of receipt of the charge.

Step 7 - Hearing in a U.S. District Court

1. Within 30 days after either party elects to go to federal court, DOJ will commence a civil action on behalf of the aggrieved person in U.S. district court.

2. If the court finds that a discriminatory housing practice has or is about to occur, the court can award actual and punitive damages as well as attorneys fees.

Step 8 - Hearing before a HUD ALJ

1. If neither party elects, a HUD ALJ will hear the case. An attorney from HUD will represent the aggrieved party before the ALJ.

2. When the ALJ decides the case, the ALJ will issue an initial decision.

3. If the ALJ finds that housing discrimination has occurred or is about to occur, the ALJ can award a maximum civil penalty of \$11,000, per violation, for a first offense, in addition to actual damages for the complainant, injunctive or other equitable relief, and attorneys' fees.

4. Within 15 days of the issuance of the ALJ's initial decision, any party adversely affected by the ALJ's initial decision can petition the Secretary of HUD for review.

5. The Secretary of HUD has 30 days after the initial decision to affirm, modify, or set aside the ALJ's initial decision, or remand the initial decision for further proceedings. If the Secretary does not take any action within 30 days, the decision will be considered the Department's final decision. 6. After the Department has issued a final decision, any party aggrieved by the Department's final decision can appeal to the appropriate court of appeals.

Contact Information

Headquarters

Georgina Verdugo, Director

Office for Civil Rights
U.S. Department of Health and Human Services
200 Independence Avenue, S.W.
Room 509F HHH Bldg.
Washington, D.C. 20201

Region VII - Kansas City (Iowa, Kansas, Missouri, Nebraska)

Frank Campbell, Regional Manager
Office for Civil Rights
U.S. Department of Health and Human Services
601 East 12th Street - Room 248
Kansas City, MO 64106
Voice Phone (816)426-7277
FAX (816)426-3686
TDD (816)426-7065

U.S. Department of Housing and Urban Development – St. Louis Field Office Office of Fair Housing and Equal Opportunity

1222 Spruce Street, 3rd Floor
St. Louis MO 63103
Mr. Eddie Wartts, Director
(314-539-6327
Eddie.l.wartts@hud.gov

Fair housing concerns may also be discussed with:

St. Louis Metropolitan Equal Housing Opportunity Council

1027 S. Vandeventer Ave.
St. Louis MO 63110, (314) 534-5800

Our Mission Statement

The Metropolitan St. Louis Equal Housing Opportunity Council (EHOC) seeks to ensure equal access to housing for all people through education, counseling, investigation and enforcement.

Who We Are

We are the only private, not-for-profit fair housing enforcement agency working to end illegal housing discrimination in the Metropolitan St. Louis area. We operate throughout Missouri and Illinois. EHOC fights illegal housing discrimination through:

- Education on fair housing laws for housing providers (lenders, landlords, real estate agents and insurance agents), local governmental bodies (those who should be concerned about the affects of discrimination on their communities) and the general public (especially those who are most likely to experience illegal discrimination; and
- Enforcement actions against those who we find, through our investigations, discriminate illegally; and
- Community outreach, by participating in grass-roots and community-based projects; working with academics, civil rights leaders, and the housing industry; and spreading the word about our services and message through public service announcements, press releases, distribution of material, and the creation of this website.

EHOC takes calls from individuals who believe they may have been discriminated against while trying to buy a home, rent an apartment, get a mortgage or apply for home owners insurance or in the way they've been treated by a landlord or an insurance agent while in their home. We investigate your claim and help resolve your complaint. Basically, if you think you've been discriminated against illegally in some way connected to where you live, give us a call!

EHOC was founded in 1992 as a result of a Confluence St. Louis (now Focus St. Louis) task force on Racial Polarization. By 1994, a dedicated volunteer Board was awarded a HUD grant to set up an office and hire the first paid staff. By early 1995, EHOC had three full time staff members and the capacity to investigate individual claims of housing discrimination. Since that beginning, EHOC has expanded our funding base to include local corporate and individual donors, a local private foundation, small county and city project grants and fee-for-service contracts with municipalities and housing providers.

There is no doubt that the greater St. Louis region experiences housing discrimination at least as often as the rest of the country, and the rest of the country sees it a lot. HUD estimates that the case load they hear each year only scratches the surface of the problem, and the problem is grave. The only barrier between home seekers and their choice of a home should be money. Illegal discrimination means that people are being denied their right to live where they want to live. Illegal discrimination also has a wider impact: economic advantages of home ownership are lost, neighborhoods wanting to become or remain diverse are thwarted, schools become or remain segregated and the community as a whole is hurt.

City of St. Charles Fair Housing and Human Relations Concerns:

Fair Housing Concerns may be brought to the City of St. Charles Fair Housing Commission, meetings are held quarterly January, April, June, and October. Meetings are held the 3rd Thursday of each month at 9:00 am, St. Charles City Hall, 200 N. Second Street, 4th Floor Conference Room B. All meetings are open to the public.

The City of St. Charles Human Relations Commission meets monthly on the 1st Thursday, at the Police Department Community Conference Room, 1781 Zumbuhl Rd. St. Charles, MO 63301. All meetings are open to the public.

Fair Housing and Human Relations Concerns may be brought in person or in writing to the Department of Community Development, St. Charles City Hall, 3rd Floor suite 303, Attention Anita Telkamp (636) 949-3224 or by email Anita.Telkamp@stcharlescitymo.gov

The City of St. Charles Adopted the Title IV Plan which has already been submitted to HUD within previous Annual Action Plans. A an electronic copy is available upon request by contacting Anita Telkamp at 636-949-3224 or by email noted above..

All public notices posted and published, invitations, and agendas includes the following statement:

The City of St. Charles offers all interested citizens the opportunity to attend public meetings and comment on public matters. If you wish to attend this public meeting and require an accommodation due to a disability, please contact the Office of the City Clerk to coordinate an accommodation at least two (2) business days in advance of the scheduled meeting at 636-949-3282 or 636-949-3289 (TTY – for the hearing impaired). The City of St. Charles, Missouri fully complies with Title VI of the Civil Rights Act of 1964 and related statutes and regulations in all programs and activities. For more information or to obtain a Title VI Complaint Form, please call the City Clerk's Office at 636-949-3282 or visit City Hall located at 200 North Second Street, St. Charles, MO, 63301.

