

City of Milford, Connecticut
Consolidated Annual Performance and Evaluation Report (CAPER)
Community Development Block Grant (CDBG) and
CARES Act Community Development Block Grant – Coronavirus (CDBG-CV)
Program Year 47
October 1, 2021 to September 30, 2022

15-day Public Comment Period
December 6, 2022 – December 21, 2022

CAPER FY2021

Table of Contents

The following CAPER and Narrative have been submitted electronically to the HUD via the Integrated Disbursement and Information System (IDIS).

Grantee Performance Report HUD 4949.1

CAPER Narrative by Section

CR-05 Goals and Outcomes 91.520(a)

CR-10 Racial and Ethnic composition of (person/households/families) assisted - 91.520(a)

CR-15 Resources and Investments 91.520(a)

CR-20 Affordable Housing 91.520(b)

CR-25 Homeless and Other Special Needs 91.220(d, e); 91.320(d, e); 91.520(c)

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

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

CR-40 Monitoring 91.220(d, e); 91.520(c)

CR-45 CDBG 91.520(c)

Attachments

IDIS Reports PR03 Activity Summary Report (CDBG & CDBG-CV)

IDIS Reports PR02 List of Activities by Program Year and Project (CDBG & CDBG-CV)

IDIS Reports PR23 Summary of Accomplishments (CDBG & CDBG-CV)

IDIS Reports PR26 Financial Summary Report (CDBG & CDBG-CV)

Public Notice with any written comments received

Project Pictures, if available.

Cover Page
Grantee Performance Report
Community Development Block Grant Program

U.S. Department of Housing and
Urban Development
Office of Community Planning
and Development

OMB Approval No. 2506-0077 (exp.5/31/97)

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Do not send this form to the above address.

See HUD Handbook 6510.2, "Entitlement Grantee Performance Report Instructions" for guidance on completing this report

1. Report for the Program Year ending (date):

9-30-22

2. Grant Number:

B21-MC-09-0003

3. Name & Address of Grantee:

City of Milford
Economic + Community Development
70 W. River Street 2nd Floor
Milford CT 06460

4. Name & Address of Community Development Director:

Julie Nash, Director
70 W. River Street, 2nd Floor
Milford CT 06460

5. Name & Telephone Number of person most familiar with information in this report:

Sheila Davis, CDBG Administrator
203-783-3230

6. Name & Telephone Number of person to contact about disclosures required by the HUD Reform Act of 1989:

Same

7. Have these Community Development Block Grant (CDBG) funds been used:

a. to meet the community development program objectives specified in the final statement for this program year? If no, explain, in a narrative attachment, how: (1) the uses did not relate to program objectives; and (2) future activities or program objectives might change as a result of this year's experiences.

☒ Yes
☐ No

b. exclusively to either benefit low-and-moderate (low/mod) income persons, aid in the prevention or elimination of slums or blight, or meet community development needs having a particular urgency? If no, explain in a narrative attachment.

☒ Yes
☐ No

c. such that the grantee has complied with, or will comply with, its certification to expend not less than 70% of its CDBG funds, during the specified period, on activities which benefit low/mod income persons? If no, explain in a narrative attachment.

☒ Yes
☐ No

8. Were citizen comments about this report and/or the CDBG program received? If yes, attach a narrative summary.

☐ Yes
☐ No

9. Indicate how the Grantee Performance Report was made available to the public:

a. By printed notice: (name & date of publication)

New Haven Register December 6, 2022

b. By public hearing: (place & date)

c. Other: (explain)

ECD webpage
ECD office
Public Library

10. The following forms must be completed and attached:

- a. Activity Summary, form HUD-4949.2
- b. Activity Summary, form HUD-4949.2A
- c. Financial Summary, form HUD-4949.3

- d. One-For-One Replacement Summary, form HUD-4949.4
- e. Rehabilitation Activities, form HUD-4949.5
- f. Displacement Summary, form HUD-4949.6

I hereby certify that: This report contains all required items identified above; Federal assistance made available under the Community Development Block Grant Program (CDBG) has not been utilized to reduce substantially the amount of local financial support for community development activities below the level of such support prior to the start of the most recently completed CDBG program year; all the information stated herein, as well as any information provided in the accompaniment herewith, is true and accurate.

Warning: HUD will prosecute false claims and statements. Conviction may result in criminal and/or civil penalties. (18 U.S.C. 1001, 1010, 1012; 31 U.S.C. 3729, 3802)

Typed Name & Title of Authorized Official Representative:

Signature:

Date:

Benjamin G. Blake, Mayor

x

BB

12-23-22

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Page () of ()

form HUD-4949.1(6/93)
ref Handbook 6510.2

CR-05 - Goals and Outcomes

Progress the jurisdiction has made in carrying out its strategic plan and its action plan.

91.520(a)

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

The 2021-22 Consolidated Annual Performance Report (CAPER) purpose is to provide narrative and data that reflects the progress made to carry out activity's which that meet the goals and objectives in the 5-Year Strategic Plan and Action Plan. The annual Community Development Block Grant (CDBG) Program Year Subrecipient awards benefit low- and moderate-income residents, the community overall and the local economy. In Program Year 47, the Office of Housing & Urban Development (HUD) awarded the City of Milford \$533,354 in CDBG Entitlement funding. A total of \$502,065 in CDBG Entitlement funds were expended in the program year period, October 1, 2021, and September 30, 2022.

Each year HUD runs a timeliness report to determine whether each Entitlement Community will meet an expenditure ratio of no more than 1.50 of the total grant amounts and the balance in the line of credit /Letter of Credit (LOC). On July 21, 2022, prior to the August 2, 2022, deadline, Milford's CDBG expenditure ratio was 1.09 and the city met the timeliness requirement again. The attached IDIS PR56 Timeliness Report and the PR26 Financial Summary Report documents compliance with CDBG administrative and public service spending cap regulations and financial details of the program year.

CARES Act CDBG-CV Federal Register Notice FR-6218-N-01 published August 20, 2020, established a six (6) year performance period and imposed an additional requirement to expend 80% of all CDBG-CV funds in three (3) years. Having received the CARES Act Funding Approval/Agreement(s) a year apart it the CDBG Administrator anticipated separate start dates for each grant. Upon a recent review of the separate CDBG-CV1 and CV3 Funding Approval/Agreement it appears that the start date for both grants is the same, July 28, 2020. Therefore 80% of CDBG-CV3 received on September 10, 2021, is expected to be expended in two (2) years instead of three (3) years. In accordance with FR-6218-N-01, 80% of the CARES Act CV1 and CV3 grant amount \$606,952 is due to be expended by July 28, 2023, three (3) years into the six (6) year performance period. Of the total \$606,952 CDBG-CV CARES Act (CDBG-CV1 \$303,209 and CDBG-CV3 \$303,743) \$200,308 was expended as of September 30, 2022.

The balance of CARES Act funding are 82% allocated to non-profit public facility improvements, housing, and homeless services. Should these project lead times jeopardize the City's ability to meet the 80% expenditure deadline by July 28, 2023, an extension request, as described in FR-6218-N-01 section III.B.7. (c), will be submitted to the HUD Community Planning Development (CPD) office of Hartford.

It is an immense responsibility to financially administer CDBG Entitlement award(s) along with two CARES Act grants while managing the completion of multiple projects and service awards. The pandemic ushered in new office work "norms". A hybrid and/or remote work both offered a staff health benefits and constrained the capacity of all organizations to conduct business in a timely manner.

During the program year, several outside factors stymied the efforts of the CDBG Administrator to assist Subrecipients in meeting their goals, and in turn, assist the city meet HUD requirements. The hiring process is one factor as it requires focus and experience in the human resource field.

In February 2022, the SAM registration was a particular issue for a contractor who insisted after the bid was awarded that a full SAM registration was not required. After 2 months, the project was postponed. Currently, the FY2021 PY47 Milford Redevelopment & Housing electrical upgrade and improvement project is on the "At-Risk" project having not expended funds for over 12 months as of September 30, 2022. The MRHP project manager reported an equipment delivery date of July 2023. The MRHP project manager is competent and responsive. It is possible this project is part of a larger PHA back-log of post COVID projects.

In general, the housing program had some success in FY2021-22 by send multiple projects bid notices and email reminders out to attract new contractors to bid. The shortage of labor, price of material and long lead times for equipment continued to increase bid prices and delay project start times. Both for-profit and non-profit struggled with work slowdowns due to staff shortages, overlap in responsibility, a lack of expertise and/or understanding of federal bid process. All, and slow response time by project management have contributed to the low expenditure rate of CARES Act funds.

The PY47 facility improvement projects and two-third of the public service activities were completed on time, but all experienced some delay due to the factors reported. An extensive environmental review of the Connecticut Audubon Coastal Center ramp repair and the preparation of a bid specification stalled the bid until August 2022. A single competent, qualified, and available contractor attended the walk-through, was awarded the bid, and finished the ramp repair in 30 days, and before program year end. All CDBG Subrecipients are offering services and programs during regular business hours while maintaining a level of attention to COVID health and safety measures with a high degree of professionalism and teamwork. Activity data and accomplishment details are found in the attached IDIS PR03.

The city has reported all subaward allocations of \$30,000 or more in Federal Funding Accountability and Transparency Act Subaward Reporting System (FSRS) in accordance with the Federal Funding Accountability and Transparency Act of 2006 (FFATA).

Comparison of the proposed versus actual outcomes for each outcome measure submitted with the consolidated plan and explain, if applicable, why progress was not made toward meeting goals and objectives. 91.520(g)

Categories, priority levels, funding sources and amounts, outcomes/objectives, goal outcome indicators, units of measure, targets, actual outcomes/outputs, and percentage completed for each of the grantee's program year goals.

Additional narrative on the jurisdictions progress made toward its goal and objectives is provided in this section. Outcome data and details are found in the attached IDIS PR23, PR26 and PR03 IDIS reports.

Goal	Category	Source / Amount	Indicator	Unit of Measure	Expected – Strategic Plan	Actual – Strategic Plan	Percent Complete	Expected – Program Year	Actual – Program Year	Percent Complete
AMS-1 Overall Coordination	Administration	CDBG: \$	Other	Other	5	0	0.00%			
AMS-2 Special Studies/Management	Administration	CDBG: \$	Other	Other	0	0				
AMS-3 Oversight	Administration	CDBG: \$	Other	Other	0	0				
CDS-1 Infrastructure	Non-Homeless Special Needs	CDBG: \$	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	Persons Assisted	27170	11186	41.17%	4500	5593	124.29 %
CDS-1 Infrastructure	Non-Homeless Special Needs	CDBG: \$	Public Facility or Infrastructure Activities for Low/Moderate Income Housing Benefit	Households Assisted	0	0				
CDS-1 Infrastructure	Non-Homeless Special Needs	CDBG: \$	Other	Other	0	0				
CDS-2 Community Facilities	Non-Housing Community Development	CDBG: \$	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	Persons Assisted	54710	8817	16.12%	500	8142	1,628.40%
CDS-2 Community Facilities	Non-Housing Community Development	CDBG: \$	Public Facility or Infrastructure Activities for Low/Moderate Income Housing Benefit	Households Assisted	0	0				
CDS-2 Community Facilities	Non-Housing Community Development	CDBG: \$	Other	Other	0	0				

CDS-3 Accessibility Improvements	Non-Housing Community Development	CDBG: \$	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	Persons Assisted	0	0				
CDS-3 Accessibility Improvements	Non-Housing Community Development	CDBG: \$	Public Facility or Infrastructure Activities for Low/Moderate Income Housing Benefit	Households Assisted	0	0				
CDS-3 Accessibility Improvements	Non-Housing Community Development	CDBG: \$	Other	Other	5	0	0.00%	1	1	100%
CDS-4 Public Services	Non-Housing Community Development	CDBG: \$	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	1620	1259	77.72%	625	803	128%
CDS-4 Public Services	Non-Housing Community Development	CDBG: \$	Public service activities for Low/Moderate Income Housing Benefit	Households Assisted	0	0				
CDS-4 Public Services	Non-Housing Community Development	CDBG: \$	Other	Other	0	0				
CDS-5 Public Safety	Non-Housing Community Development	CDBG: \$	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	Persons Assisted	0	0				
CDS-5 Public Safety	Non-Housing Community Development	CDBG: \$	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	0	0				

CDS-5 Public Safety	Non-Housing Community Development	CDBG: \$	Other	Other	0	0				
CDS-6 Open Space	Non-Housing Community Development	CDBG: \$	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	Persons Assisted	0	0				
CDS-6 Open Space	Non-Housing Community Development	CDBG: \$	Public Facility or Infrastructure Activities for Low/Moderate Income Housing Benefit	Households Assisted	0	0				
CDS-6 Open Space	Non-Housing Community Development	CDBG: \$	Other	Other	0	0				
EDS-1 Economic Development	Economic Development	CDBG: \$	Facade treatment/business building rehabilitation	Business	0	0				
EDS-1 Economic Development	Economic Development	CDBG: \$	Jobs created/retained	Jobs	0	0				
EDS-1 Economic Development	Economic Development	CDBG: \$	Businesses assisted	Businesses Assisted	45	0	0.00%			
EDS-1 Economic Development	Economic Development	CDBG: \$	Other	Other	0	0				
EDS-2 Employment	Economic Development	CDBG: \$	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	0	4		14	4	28.57%
EDS-2 Employment	Economic Development	CDBG: \$	Public service activities for Low/Moderate Income Housing Benefit	Households Assisted	0	0				
EDS-2 Employment	Economic Development	CDBG: \$	Jobs created/retained	Jobs	0	0				

EDS-2 Employment	Economic Developme nt	CDBG: \$	Businesses assisted	Business es Assisted	0	0				
EDS-2 Employment	Economic Developme nt	CDBG: \$	Other	Other	0	0				
EDS-3 Financial Assistance	Economic Developme nt	CDBG: \$	Jobs created/retained	Jobs	0	0				
EDS-3 Financial Assistance	Economic Developme nt	CDBG: \$	Businesses assisted	Business es Assisted	0	0				
EDS-3 Financial Assistance	Economic Developme nt	CDBG: \$	Other	Other	0	0				
HMS-1 Operational Support	Homeless	CDBG: \$	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	870	1651	189.77 %	250	263	95%
HMS-1 Operational Support	Homeless	CDBG: \$	Homeless Person Overnight Shelter	Persons Assisted	0	0		0	0	
HMS-1 Operational Support	Homeless	CDBG: \$	Overnight/Emer gency Shelter/Transitio nal Housing Beds added	Beds	850	71	8.35%	130	72	56%
HMS-1 Operational Support	Homeless	CDBG: \$	Homelessness Prevention	Persons Assisted	870	1651	189.77 %	200	335	168%
HMS-2 Housing	Homeless	CDBG: \$	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	Persons Assisted	0	0				
HMS-2 Housing	Homeless	CDBG: \$	Public Facility or Infrastructure Activities for Low/Moderate Income Housing Benefit	Househo lds Assisted	0	0				

HMS-2 Housing	Homeless	CDBG: \$	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	0	0				
HMS-2 Housing	Homeless	CDBG: \$	Overnight/Emergency Shelter/Transitional Housing Beds added	Beds	0	0				
HMS-2 Housing	Homeless	CDBG: \$	Other	Other	0	0				
HMS-3 Landlord Engagement	Homeless	CDBG: \$	Tenant-based rental assistance / Rapid Rehousing	Households Assisted	0	0				
HMS-3 Landlord Engagement	Homeless	CDBG: \$	Other	Other	6	0	0.00%			
HSS-1 Preserve Existing Housing Stock	Affordable Housing Public Housing	CDBG: \$	Rental units rehabilitated	Household Housing Unit	10	0	0.00%	25	0	0.00%
HSS-1 Preserve Existing Housing Stock	Affordable Housing Public Housing	CDBG: \$	Homeowner Housing Rehabilitated	Household Housing Unit	20	115	575.00 %	4	114	2,850.00 %
HSS-1 Preserve Existing Housing Stock	Affordable Housing Public Housing	CDBG: \$	Direct Financial Assistance to Homebuyers	Households Assisted	5	0	0.00%			
HSS-1 Preserve Existing Housing Stock	Affordable Housing Public Housing	CDBG: \$	Other	Other	5	0	0.00%			
HSS-2 Housing Service Program(s)	Affordable Housing	CDBG: \$	Public Facility or Infrastructure Activities for Low/Moderate Income Housing Benefit	Households Assisted	0	0		15	15	100%
HSS-2 Housing Service Program(s)	Affordable Housing	CDBG: \$	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	125	35	28.00%	25	17	68%
HSS-2 Housing Service Program(s)	Affordable Housing	CDBG: \$	Other	Other	0	0				

HSS-3 Affordable Housing	Affordable Housing	CDBG: \$	Public service activities for Low/Moderate Income Housing Benefit	Households Assisted	25	7	28.00%	6	6	100%
HSS-3 Affordable Housing	Affordable Housing	CDBG: \$	Rental units constructed	Household Housing Unit	0	0				
HSS-3 Affordable Housing	Affordable Housing	CDBG: \$	Homeowner Housing Added	Household Housing Unit	0	0				
HSS-3 Affordable Housing	Affordable Housing	CDBG: \$	Other	Other	0	0				
HSS-4 Housing Education	Affordable Housing	CDBG: \$	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	100	0	0.00%	0	0	0%
HSS-4 Housing Education	Affordable Housing	CDBG: \$	Public service activities for Low/Moderate Income Housing Benefit	Households Assisted	0	0				
HSS-4 Housing Education	Affordable Housing	CDBG: \$	Other	Other	0	0				
HSS-5 Homeownership	Affordable Housing	CDBG: \$	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	0	0				
HSS-5 Homeownership	Affordable Housing	CDBG: \$	Direct Financial Assistance to Homebuyers	Households Assisted	3	0	0.00%	1	1	100%
HSS-5 Homeownership	Affordable Housing	CDBG: \$	Other	Other	0	0				
SNS-1 Other Special Needs	Non-Homeless Special Needs	CDBG: \$	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	Persons Assisted	0	0				

SNS-1 Other Special Needs	Non-Homeless Special Needs	CDBG: \$	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	10060	0	0.00%	0	0	0%
SNS-1 Other Special Needs	Non-Homeless Special Needs	CDBG: \$	Other	Other	0	0				
SNS-2 Housing	Non-Homeless Special Needs	CDBG: \$	Rental units constructed	Household Housing Unit	0	0				
SNS-2 Housing	Non-Homeless Special Needs	CDBG: \$	Rental units rehabilitated	Household Housing Unit	0	0				
SNS-2 Housing	Non-Homeless Special Needs	CDBG: \$	Homeowner Housing Added	Household Housing Unit	0	0				
SNS-2 Housing	Non-Homeless Special Needs	CDBG: \$	Homeowner Housing Rehabilitated	Household Housing Unit	0	0				
SNS-2 Housing	Non-Homeless Special Needs	CDBG: \$	Other	Other	0	0				

Table 1 - Accomplishments – Program Year & Strategic Plan to Date

Assess how the jurisdiction's use of funds, particularly CDBG, addresses the priorities and specific objectives identified in the plan, giving special attention to the highest priority activities identified.

The following is a self-assessment of jurisdictions progress at the end of the program year. Details are found in the following IDIS reports: PR26 Financial Summary Report administrative and public service expenditure caps; PR03 Grantee Summary Activity Report (GPR) activity goals, accomplishment, and expenditures for the program year; PR23 CDBG Summary of Accomplishments; PR05 Drawdown Report by Project and Activity.

ACTIVITY ACCOMPLISHMENT BY STRATEGY

CR-05 Affordable Housing

AFFORDABLE HOUSING PROGRAMS / SERVICES / OPPORTUNITY Milford's residential housing programs offer owners energy efficient and aim to reduce home costs burdens for owners and renters. In

addition, a small new repair housing program proved to meet a need but is on hold until a new contractor is hired. Milford housing programs are geared to meet resident and market needs, promote inclusivity, give low- and moderate-income households opportunity to move to or continue to reside in Milford, improve general housing stock, deter fair housing discrimination, and improve tenant/landlord relations.

CDBG and CARES Act funds are allocated to the Human Services Department for Rental, Mortgage and Utility Assistance may have been underspent due to an overwhelming response to the CT State Coronavirus Rental Assistance Program. Milford agencies were regularly reminded of CDBG CARES Act funding to assist residents. The pandemic CDC, State and Federal eviction moratorium protected many renters and owners. An increase of housing inquiries was felt when the state and federal moratorium(s) and federal continuum of care funding for homeless services ended. Most the inquiry's ranges centered around unreasonable rent increases and assistance to find a new apartment due to non-renewal of lease. The CT Fair Housing Center reported double the number of calls in 2022. The security deposit program first funded in October 2020 can be a lifeline should a household find a rental in Milford. Both CDBG and CARES Act funds are allocated. CDBG staff manages this program since no local agency has applied to run it. Guidelines and an application, and a W9 allow a payment on behalf of the tenant direct to the property management company upon signing a one-year lease.

"Economists almost all agree the housing shortage is a big drag on the economy."

<https://www.economist.com/finance-and-economics/2021/09/11/how-to-turn-nimbys-into-yimbys>

The housing shortage contributes to the high price of housing in CT, inhibits improvements to existing housing, job growth in the construction industry, and exacerbates an imbalance in property ownership by race. Overly restrictive residential zoning laws have contributed to a 50% reduction in housing builds since 1964.

A CT State statute required every Connecticut town to prepare an Affordable Housing Plan as of June 30, 2022. The new Affordable Housing Plan can allow a town to focus on the type of housing needed and facilitate modest changes to zoning laws that allow residents to age in place or downsize, subsidize a fixed income, develop residential mixed-use apartments using existing commercial strip mall and support neighborhood businesses.

CR-05 Non-Housing

NON-HOUSING COMMUNITY DEVELOPMENTPUBLIC FACILITY IMPROVEMENTS Public facility projects are focused on improving accessibility and pedestrian safety. CDBG funds are allocated to the Department of Public Works (DPW) sidewalk program and used to install ADA curb cuts and grade existing sidewalks and/or extend a sidewalk to create a continuous walkway. In PY46 Beaver Brook Trail accessibility improvements were completed in April of 2022. In PY47 the CT Audubon Coastal Center, another outdoor recreational asset in Milford, received funds to repair its ADA accessible ramp around ramp. Department of Public Works received CDBG-DR funds and continues to work to complete several flood mitigations projects. The city of Milford received \$6.33 million in ARPA funding between June

2021 and June 2022.

ECONOMIC DEVELOPMENT The CARES Act Business Assistance Program developed and marketed in October 2020 by the CDBG Administrator on behalf of the Director. Efforts were made to review applications quickly for the ECD Director were complicated by a CDBG staff shortage and general inexperience verifying for-profit business income and HUD requirements effected the capacity to run the program with confidence. In general, Milford business community showed low interest in the local program and sought State and SBA COVID related funds. The CARES Act business program was canceled. The City announced ARPA funds would be available to businesses. CDBG-CV funds were awarded to Three (3) for-profit businesses and one (1) non-profit childcare center for the purpose of recuperating cost to pay staff overtime and paid time off to recover from COVID.

The Director supports local and regional business groups, and the State of CT Tourism committee, is involved in filling vacant commercial space, pedestrian safety, and downtown business initiatives. The Director of the Department Economic and Community Development (ECD) coordinates the Economic Development Commission meetings. The Director has not sought to use CDBG funds toward a Section 108 Loan Program for the purpose of economic development or to leverage other infrastructure investments to date.

PROGRAM ADMINISTRATION /OVERSIGHT /COORDINATION The pandemic ushered in new office schedules and work “norms”. These factors, among others, while a health benefit, have constrained the capacity of all organizations to conduct business in a timely manner. During the program year, several outside factors stymied the efforts of the CDBG Administrator to assist Subrecipients in meeting their goals, and in turn, assist the city meet HUD requirements. The hiring process is one factor as it requires focus and experience in the human resource field.

Since July 2020, much effort has been made by the CDBG Administrator to hire qualified staff and provide necessary training. It is incumbent on the department supervisor employing seasonal worker(s) or consultant(s) to complete this process with little involvement by HR. HR is an unfamiliar area and requires a great amount of time and attention. In January 2022, CDBG Administrator began a hiring process to employ two (2) new project manager(s). A residential contractor to complete small housing repairs and a HVAC technical service manager to oversee two (2) HVAC projects funded with CARES Act. Both experienced a slow SAM registration process, and contract negotiation was delayed, guidance to prepare a scope of work and understand the federal bid process was provided. The residential contractor delayed the work until October 2022, then did not complete quality work and has not received a new project. Time and attention dedicated to the search for a new part time clerk began in July 2022. A candidate was hired in September 2022 and resigned the job a short time later.

When the right candidate accepts a job, the benefits of employing a person to help manage the workload is gratifying and makes the training process worthwhile. Due to staff vacancy, expenditure of the PY48 the program administration budget is expected to fall short of the 20% cap. If the time constraints of the administrator continue into 2023, a dip in the administrative spending would affect

the overall timeliness ratio on August 2, 2023.

CR-05 Public Services

PUBLIC SERVICES The public service providers capacity to report in a timely manner improved during the program year. CDBG reports and reimbursement requests are required to be mailed as of 2021 as it is more manageable for the CDBG and in line with record keeping requirements. Three of Milford's public service made permanent program changes. One expanded its program beyond the service area and increased the number of non-low- and moderate-income participants. Another discontinued the CDBG eligible program. The third expanded its services to a neighboring town and further decreased participation at the Milford location. The Milford Adult Education did not regain its pre-pandemic enrollment level or offer career / job skill classes in the Winter of January 2022. At a time when employment training is an obvious benefit, health concerns and/or fear of COVID-19 eclipsed the fundamentals of "conventional wisdom" about personal household economics. As of September 1, 2022, PY47 scholarship award balance was reprogrammed to the Beth El Center cost of opening a Cooling Shelter. The PY48 award will be reprogrammed to the cost of the new elevator at the public library.

Housing services such as Security Deposit and Subsistence Payments receiving funding each year. The capacity of homeless services has been tested and continues to be stretched beyond its "pandemic capacity" level. The number of unsheltered homeless and housing instability is increasing not decrease due to evictions and non-renewal of lease practices. According to Jennifer Paradis, Director of the Beth El Center, the Beth El No Freeze shelter provided life-saving shelter to 72 men and woman in the 2021-22 winter season, over 30% of those found permanent housing in the process. The additional FEMA/ESG funds for food and the non-congregate shelter available between FY2020-FY2022 is no longer available but very necessary. The results of additional funding had positive impacts on the level of health, crime, and employment. (National Low Income Housing Coalition)
<https://nlihc.org/resource/new-study-finds-providing-people-experiencing-homelessness-housing-has-positive-impacts>

During the FY2021-22 the office and Fair Housing Officer received several emails and phone inquiries regarding housing:

HOUSING INQUIRY SHEET 10/1/21- 9/30/22

45	# of SF Hsg Repair
0	# of MF Hsg Repair
10	# of Homebuyer Downpayment Asst
25	# of Security Deposit
18	# of Affordable Hsg
9	# of RentalMtg Asst
4	# of Fair Housing & Tenant/Landlord
3	# of Homeless Asst
4	# of S-30g Units
4	# of MRHP Hsg wait list

CR-10 - Racial and Ethnic composition of families assisted

Describe the families assisted (including the racial and ethnic status of families assisted). 91.520(a)

	CDBG
White	12,448
Black or African American	593
Asian	415
American Indian or American Native	1
Native Hawaiian or Other Pacific Islander	7
Total	13,464
Hispanic	816
Not Hispanic	12,648

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

Narrative

The CR-10 Table reflects CDBG Subrecipient accomplishment data on the racial and ethnic composition of Milford families assisted during the program year. Subrecipients report on a quarterly or monthly basis so the data can be entered into the Integrated Disbursement and Information System (IDIS) at the time it is disbursed. The IDIS PR03 CDBG Activity Summary Report or Grantee Performance Report (GPR) provides all activity accomplishment and data detail.

American Community Survey (ACS) are used to estimate Milford's population, demographics, housing, income, age, disability, economics, and education. Besides ACS from the Census Bureau site, CT Data Haven, World Population Review, and the CT United Way ALICE Report are regular sources of information.

CR-15 - Resources and Investments 91.520(a)

Identify the resources made available

Source of Funds	Source	Resources Made Available	Amount Expended During Program Year
CDBG	public - federal	533,354	502,065

Table 3 - Resources Made Available

Narrative 12/14

In total, Milford expended \$578,777.64 in CDBG and CDBG-CV CARES Act fund in the PY47 FY2021-2022. The Milford 2020-2021 Annual Report is available on the City website. For additional expenditure information see attached PR03 and PR23 IDIS report. The 2021 Milford Annual Report is available at <https://www.ci.milford.ct.us/mayors-office/pages/annual-reports>

Identify the geographic distribution and location of investments

Target Area	Planned Percentage of Allocation	Actual Percentage of Allocation	Narrative Description
Citywide	100	100	
Devon Neighborhood of Milford	0	0	

Milford receives an entitlement award based on a HUD formula that includes percentage of low to moderate income census tract and a population over 50,000. Milford qualifies as a HUD Exception Grantee because no census tract has a concentration of low to moderate income households higher than 51%. An Exception Grantee takes its highest 25% of low/mod CT/BG to determine the “upper quartile” low/mod percentage. The Upper Quartile percentage is used by the City to determine areas the grant funds can be expended. According to the American Community Survey (ACS) FY2022 2011-2015 Low- and Moderate-Income Summary Data ACS, Milford’s Low/Mod percentage is 29.81%, unchanged from FY2021. In FY2019 it was 35.7% and in FY2017 32.7%. Historically, the percentage of low-moderate income household in a census tract has varied with each new HUD data set provided. For this reason, it is not possible to designate a geographical target area. Higher percentage of low to moderate income CT/BG in both 2017 and 2019 were geographically located in southwest neighborhoods of Milford or in neighborhoods where the property size is less than a ½ acre. Funds are allocated to service providers or to public facility projects in the service areas to reach the highest return on public benefit.

During the program year, efforts are made by the Department of Economic and Development Director, the CDBG Administrator and the department staff collaborate to improve and streamline systems, build organizational capacity, and offer technical assistance. These in-kind efforts provide municipal resources and information to City Departments, for-profit and non-profit companies for which to leverage and execute business plans or improve infrastructure, public facilities, and services for the City of Milford.

The Milford Hazard Mitigation Committee provides a vital service to the city and its residents. The Committee members are knowledgeable emergency responders, coordinate City services during an emergency and prepare the City Hazard Mitigation Plan to address flood emergency. The committee works with agents from the state and federal emergency management teams such as FEMA. Hazard Mitigation Committee reports that disaster relief grants continue to be available through FEMA, with a Disaster Declaration, and through the State of CT, Office of DEMHS. The ECD Director advises the grant to require an application by the city, generally, the criteria differ each year, and is a very competitive application process.

Leveraging

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

Marsh and wetland areas run throughout the city as well as along the LIS coastline, southwest boarder and north of I95. These areas are susceptible to river and LIS flooding and damage from storms. CDBG funding to strengthen public sewer infrastructure has been allocated in the recent past and is available for future projects to mitigate and prevent flood conditions from coastal or interior waterways.

CDBG funds can leverage additional resources (private, state, and local funds) to satisfy a matching requirement, when required. In FY2021 \$75,787 in CDBG funds were allocated to the Department of Public Works to install ADA curb cuts and grade the adjacent sidewalk. In low- and moderate-income service areas new sidewalks are installed to create a continuous pedestrian walkway. The city paving contractor has worked hard to reduce the work delay stemming from the 2020 shutdown due to COVID-19. In FY21 Ten (10) ADA curb cuts and grade sidewalk were completed. A funding balance of \$15,581 remains open to complete in FY22.

CR-20 - Affordable Housing 91.520(b)

Evaluation of the jurisdiction's progress in providing affordable housing, including the number and types of families served, the number of extremely low-income, low-income, moderate-income, and middle-income persons served.

	One-Year Goal	Actual
Number of Homeless households to be provided affordable housing units	575	30
Number of Non-Homeless households to be provided affordable housing units	16,045	0
Number of Special-Needs households to be provided affordable housing units	5,434	0
Total	22,054	0

Table 5 – Number of Households

	One-Year Goal	Actual
Number of households supported through Rental Assistance	25	21
Number of households supported through The Production of New Units	0	0
Number of households supported through Rehab of Existing Units	6	7
Number of households supported through Acquisition of Existing Units	1	0
Total	32	28

Table 6 – Number of Households Supported

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

The CDBG Housing Program(s) are funded annually with the intention of making homes and rental for affordable by decreasing the overall costs to repair, own or rent a home. The number of households assisted in each program year has a great deal to do with the economy, the number of applicants and program coordination. Interest by residents and from qualified contractor in the CDBG has waned since 2019. The effect of COVID-19, in 2020 and 2021, on interest in bidding, availability, material costs were apparent. In 2021-22 material lead times are shorter and contractors showed more interest in bidding. A dedicated staff person experienced in property management will increase the number of residents assisted, manage program paperwork, monitor contractor the consultant to ensure a timely completion of the project. Without a dedicated project manager on staff the program relies on the CDBG Administrator, and an outside consultant does a third of the work according to their schedule. All activity accomplishment and data can be found in the attached IDIS Report PR03.

An evaluation of progress toward affordability begins by acknowledging that without “affordability”, home sale and rental prices are out of range for households who meet HUD 80% Area Median Income (AMI), or State Median Income limits (SMI) required by CT Statute 8-30g. The FY2022 the CTHUD Metro Fair Market Rent Area Median Family Income is \$113,600 and the FMR rent price for a one (1) bedroom unit is \$967. The HUD 80% low- and moderate-income limit of a household of one (1) is \$62,600. FY2019 ASC Data Profile estimated 5,306 households rented in Milford at a median gross rent of \$1,574, and the national median gross rent of \$1,062.

According to the 2000 Census, 34% of the homes in Milford were valued at \$150,000. In FY2019 ACS Data Profile estimated the median home price in Milford is \$313,400, 16,720 owner-occupied homes of which 9.4% were valued between \$100,000 – \$199,999.

May 30, 2022, Milford, with assistance from the South-Central Regional Council of Governments (SCRCOG), implemented the State of Connecticut’s General Statutes Section 8-30j and prepared an Affordable Housing Plan. With a Plan in place, the next step is to facilitate conversations with residents and local officials with the purpose of finding common ground, an understanding of how market rate housing does not meet the need of the aging population, growing families and youth who want to live in Milford. Housing variety provides the opportunity for people of all income levels and race afford to house themselves and support the local economy.

It is clear the deepening of the housing affordability crisis nationally is the result of systemic failure to correct economic inequality. The blame belongs in equal parts to an overreach of zoning laws, local resistance to affordable “low-income” housing and NIMBYs, a housing supply shortage caused by the 2008 financial crisis, pandemic demand due to changes in business culture and digital work, owner greed at all levels, and growing competition for land/real estate by capital investors. The pandemic was the tipping point that brought a sea change in work-life balance, an impetus for changes in the business model, particularly for startup technical companies. A move from traditional business centers to the suburbs reduced companies’ overhead cost and shifted it to the employee. This shift, and the influence of large scale investor buying residential real estate market, increased home prices and pushed rents to a new level, referred to as the “rise of the rents” by Richard Florida, a writer for Bloomberg CityLab <https://www.bloomberg.com/news/features/2022-09-08/why-did-housing-costs-explode-during-the-pandemichousing>

Housing experts agree the solution to Connecticut’s housing shortage requires a multi-faceted approach. Suggested

amendments to zoning requirements across CT continue to be discussed and denied. Current zoning restrictions favor the construction of single-family homes and commercial buildings. Reducing residential lot sizes and setbacks, removing the public hearing requirement will both decrease the construction costs and allow private property owners and contractors some flexibility to build according to household need and the market demand. With zoning restrictions in place owners are less unlikely to realize the market value of their home, downsize to a “ready to move” into home at a similar price or less, and in the town, they live in.

Amendments to zoning regulations include but are not limited to, designate mixed-use zoning districts for owns to build housing above existing commercial space; eliminate government interference on private owners and expand the proposed 2022 zoning amendments on accessory apartment regulations; require a zoning fee and create a housing trust; inclusionary zoning to add/replenish a modest number of deed restricted affordable rental units to the annual state housing moratorium list; create a Affordable Housing Committee with responsibilities to, act as an advisory board to City officials, update the Affordable Housing Plan, manage the housing trust fund, manage the 8-30g affordable housing list, to give voice to the public on housing and tenant landlord issues.

The City of Milford Code, Article XV, titled Milford Housing Partnership, outlines the purpose and responsibilities of a Housing Partnership Committee. Currently, the Milford Housing Partnership committee acts as an advisory board during the annual CDBG public participation process. With vacancy’s filled, the membership structure offers the city access to local experts and advocates with knowledge and experience in housing, real estate, construction, planning, finance, zoning, non-profits, civic and clergy. At capacity, towns have the option to create a Community Development Corporation (CDC) and use CDBG funds for new construction, act as a non-profit arm, and review finance and development information and proposals.

Discuss how these outcomes will impact future annual action plans.

Milford will focus more staff and CDBG funds to all Milford CDBG housing programs is the affordable option until the housing shortage is addressed. Expanding the allowable residential repair expenses to entice both contractors and residents to participate to alleviate deferred housing maintenance experienced by low- and moderate-income households and remain in a home or rental unit. Continued allocations from both CDBG and CDBG-CV grants to the Security Deposit Program and to the Department of Human Services (DHS) for the Subsistence Program (Rental, Mortgage and Utility Assistance) assist. And expand allowable expenses to assist a buyer to purchase their first home.

Economic and labor factors impact the timely expenditure of the CDBG funds. Funds will continue to be allocated to “shovel ready” project or active programs with the staff necessary to successfully execute the project or program to the greatest extent possible to achieve the best possible outcome and realize the greatest benefit to the community.

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

Number of Households Served	CDBG Actual	HOME Actual
Extremely Low-income	81	0
Low-income	34	0
Moderate-income	5	0
Total	120	0

Table 7 – Number of Households Served

Narrative Information

Table 7 Data is found in the attached PR23 IDIS report. In found in Home prices remain high and interest rates now higher than the economic crash of 2008, any buyers positioning themselves to buy their first home before 2021, are now unable to afford a mortgage or get a loan, as well as pay higher rent or face eviction. In August of 2022, a mother and son requested assistance from the Milford Homeownership Program. The multi-generational family were attempting to buy the rental they occupied but the landlord opted to give the home to a niece. Their offer to buy a home built in 1790, with three bedrooms, one bath home, and a sagging roof for \$245,000 was accepted. Even at that price, the new owners must continue to work multiple jobs to pay the mortgage and maintain the home.

In 2022, Connecticut remains ranked at 8 in the nation for most expensive states in the U.S. The cost-of-living index is 121.6, housing is 134.6, utilities is 132.4, transportation is 111.1, health 111.3, and miscellaneous cost 117.5. \$99,955 is the required income for a living wage. Of the 21,553 housing units in Milford, approximately .49% earn less than a living wage amount. In addition, the state's unemployment rate is one of the highest at 4.9%. Data reported by World Population Review <https://worldpopulationreview.com/state-rankings/most-expensive-states-to-live-in> and Census Bureau ACS FY2020 Financial Characteristics.

CR-25 - Homeless and Other Special Needs 91.220(d, e); 91.320(d, e); 91.520(c)

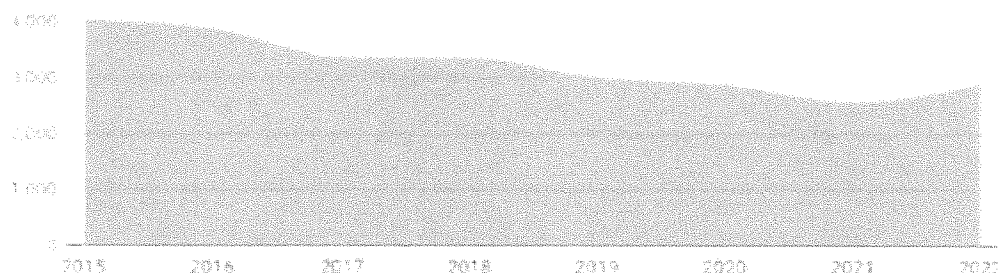
Evaluate the jurisdiction's progress in meeting its specific objectives for reducing and ending homelessness through:

Reaching out to homeless persons (especially unsheltered persons) and assessing their individual needs

The total number of people experiencing homelessness in Connecticut had dropped over the last eight years. In 2022 it increased by 13%. The factors involve a changing business climate, closings or shorter business hours reduce employee pay, rising living costs, and the lack of affordable housing stock. (The CT Mirror <https://ctmirror.org/2022/10/06/ct-homeless-population-rises-affordable-housing-instability/>)

CT's total unhoused population rises in 2022

Connecticut's total unhoused population had dropped for years before increasing in the most recent count. Hover over the chart to see details.



The count's methodology changed in 2021 because of the pandemic.

Chart: Danny Mink / CT Mirror • Source: Point-in-time count • Get the data • Created with Datawrapper

The BEC offers food, shelter and emergency No-Freeze shelter or warming center on nights where temperatures are 32 degrees and below, outreach and engagement to at risk and chronically homeless or unsheltered persons, family programs, supportive housing, and housing diversion services and cooling centers as the number of excess heat days are longer and more frequent. The Beth El Center (BEC) is a member of the Greater New Haven Connecticut's Coordinated Access Network (CAN) system. 2-1-1 Info direct calls received during business hours to CAN or CAN receives calls directly. A CAN specialist assesses the housing circumstances, offers initial assistance and additional resources when applicable.

According to the ACS 2019 Estimate Poverty Status in Past 12 months 4.8% of the 52,044 Milford residents live in poverty compared to 9.9% poverty rate in New Haven County; 11.7% in the State of Connecticut; and a national poverty rate is 13.4%. A household of 4 with an income of \$25,750 meets the 2019 Connecticut poverty guidelines.

"In Connecticut, 1-in-4 households have earnings that exceed the Federal Poverty Level (FPL) but fall short of a basic cost of living threshold. We call these households ALICE—an acronym for Asset Limited, Income Constrained, Employed, and together with the 10% of Connecticut households in poverty, more than one-third of Connecticut households (35%) are struggling to make ends meet". Visit <http://alice.ctunitedway.org>.

The United Way of Connecticut 2020 ALICE Report defines a Survival Budget as including a conservative monthly budget for the six basic necessities – Housing, Child Care, Food, Transportation, Technology (computer, internet, cell phone) and Health Care with no money for savings or emergency expenses.

Addressing the emergency shelter and transitional housing needs of homeless persons

The Beth El Center, the CAN, together with a faith-based partner coordinated to provide a 24/7 non-congregate emergency warming facility between 2020 and the 2022 winter season. DOH FEMA/ESG announced that funds would be not available for hotel due to the increase in prices. BEC announced its search to locate a host site or vacant site for operations was unsuccessful. Instead, BEC will open a Warming Center in the Soup Kitchen as of November 21, 2022. The Center can accommodate 12 individuals from the local Greater Milford community.

The CDBG-CV CARES Act were funds earmarked for rent and/or modification of the new host site or vacant space. Instead, CDBG-CV are allowed to be expended to the cost of a hotel and related services to house the medically vulnerable, COVID infected or waiting a test result and if waiting for permanent housing, when imminent.

BEC Director participated in the National Hunger and Homelessness Awareness Week to advocate for the awareness of the problems in all communities. Funds continue to support a shared Housing Diversion Specialist through the Greater New Haven Coordinated Action Network (CAN) system. Beth El Center staff participates in the Adult and Youth homeless Point in Time Count (PIT) sponsored by the Continuum of Care CT and administered by the Connecticut Coalition to End Homelessness.

Helping low-income individuals and families avoid becoming homeless, especially extremely low-income individuals and families and those who are: likely to become homeless after being discharged from publicly funded institutions and systems of care (such as health care facilities, mental health facilities, foster care and other youth facilities, and corrections programs and institutions); and, receiving assistance from public or private agencies that address housing, health, social services, employment, education, or youth needs

At a time when a “Housing First” mentality and funds to provide a non-congregate shelter and 24/7 services is vital support has waned. The 2018 HUMAN Network a multi-agency team that formed in an outreach system in response to an increase in the number of chronically homeless and transient persons living in the woods, cars, doorways in downtown Milford. The team meets monthly and is led by the Beth El Center Director, its support staff, and regularly attended by the Milford Police Public Safety officer, TEAM Inc., New Horizons, Bridges Healthcare, and City liaisons including the Mayor’s Assistant, the Health Department Director/staff, the Public Library Director and the CDBG Administrator. The outreach team engages individuals at the location and “where they are” currently to offer services and assess crisis level. Encounter are documented, referrals made, and updates provided to agency partners. Additional program accomplishment information is provided on the IDIS report PR03.

With existing HUD CDBG funding and federal ARAP funds, municipalities can allocate funds to Subsistence (rent/mortgage/utility) and Security Deposit programs in support households and individuals behind on housing or utility payments, whose landlord will not renew their lease through no fault of their own, who are discharged from institutions or hospitals, and are homeless or at risk of homelessness. Housing stability benefits the whole community, improves health and well-being, increases employment opportunities, reduces crime, and increases property values.

Helping homeless persons (especially chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth) make the transition to permanent housing and independent living, including shortening the period of time that individuals and families experience homelessness, facilitating access for homeless individuals and families to affordable housing units, and preventing individuals and families who were recently homeless from becoming homeless again

The CDBG Administrator encourages the Milford Redevelopment & Housing Partnership (MRHP) and Beth El Center to involve their Boards and promote supportive and/or scatter site housing to local officials as well as form a not-for-profit Community Based Development Organization (CBDO) or Community Development Corporation (CDC) for the purpose acquiring additions residential buildings for low-income family or person at risk of homelessness.

The Milford Department of Health and Human Services and the United Way of Milford work closely to provide additional support and resources to Beth El staff and individual shelter clients. CDBG and CDBG-CV funds are available to BEC through the Milford Human Services Subsistence (rent/mortgage/utility) Assistance and the Security Deposit Program managed by the CDBG Administrator. Both programs assist low to moderate income persons and reduce housing costs.

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

Actions taken to address the needs of public housing

Actions to address housing needs can include steps by Milford Redevelopment & Housing Partnership to access additional Housing Choice Vouchers (HCV) and create scattered senior housing units through a non-profit housing arm. The MRHP and the CDBG Administrator discussed adding broadband access to the community room spaces and new ventilation systems using CDBG-CV funds. The MRHP reports it does not offer broadband internet free to its tenants. Tenants must subscribe and pay the cost personally. No CDBG or CDBG-CV funds were requested to modernize state or federal public housing complexes to respond, prepare or prevent COVID-19.

The Milford Redevelopment and Housing Partnership, (MRHP) owns and manages six (6) rental complexes totaling 330 affordable rental units. MRHP administers 266 Housing Vouchers of which 225 were assigned as of 2020. Milford Redevelopment and Housing Partnership units are split into 55% public housing and 45% housing vouchers. Milford Redevelopment and Housing Partnership has a larger proportion of public housing units than the average housing authority. MRHP's proportion of Housing Vouchers is smaller than the average housing authority in Connecticut (Source United States Department of Housing and Urban Development hud.gov, 2014). MRHP contracts the management of their HCV program to Imagineers, LLC., a property company located in Hartford CT. The CDBG Administrator and MRHP discussed notifying current HCV landlords of the Milford housing repair program as an incentive to renovate and repair properties leased to HCV tenants.

A website for MRHP (mrhp.org) is available to the public and is a useful source of information about MRHP housing and local resources. It offers an email option under Contact Us. It offers a prerecorded message in multiple languages stating a housing pre-application will be notice in the newspaper one week before the waiting list reopens. The recording does not state the date or offer current list of housing applicant names. It offers an "emergency alert" option, but it is unknown whether MRHP communicates with applicants or residents by email, or whether a pre-application and general information update(s) are posted on the MRHP website. Earlier and electronic issuance of notices, applications and programs, news and information to tenants and the public are possible with a website. Still, the improvement is notable and promote goodwill, inclusivity, transparency by MRHP management.

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

The Milford Redevelopment & Housing Partnership does not participate in the Quality Housing and Work Responsibility Act (QHWRA) effective April 2003, which permits PHAs, through Section 32 Homeownership programs continue to operate under the existing Section 5 (h) rule, 24 CFR 906 of the U.S. Housing Act of 1937, to make public housing dwelling units available for purchase by low-income families as their principal residence. Under Section 32 a PHA may:

1. Sell all or a portion of a public housing development to eligible public or non-public housing residents.
2. Provide Capital Fund assistance to public housing families to purchase homes.
3. Provide Capital Fund assistance to acquire homes that will be sold to low-income families.

Section 32 generates an exception allowing the Public Housing Capital Fund to be used to acquire units for sale not under public housing ACC contracts. Capital funds cannot be used to build or substantially rehab units that are not public housing for sale under Section 32 are not covered under this section, but rather is governed by the public housing

development and modernization regulations. Nonetheless, the final Section 32 rule replaces the Section 5(h) rule. Substantially rehabilitate or new PHA units are included in the CT State Affordable Housing Statute 8-30g.

Actions taken to provide assistance to troubled PHAs

MRHP is not considered a troubled PHA. In the MRHP reports that it meets with residents every six weeks to discuss tenant ideas and concerns at different housing complex locations. The CDBG Administrator has not been contacted by a resident of a MRHP housing complex in this program year.

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

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

Access to land and residential property is regulated by government policy and zoning laws. Historical evidence has been documented that government ignored and promoted discriminatory practices. <https://www.epi.org/publication/the-color-of-law-a-forgotten-history-of-how-our-government-segregated-america/> The practice now referred to as “red lining” segregates communities by race and income and restricts people of color from owning property. Financial institutions still value homes in the red-line areas at lower rates affecting the ability to sell and improve the property. The result, land and homes located in predominantly white single-family neighborhoods are valued at higher rates effectively continuing the practice of red lining.

Milford’s median home price and monthly rent are above median rents in CT and nationally. Existing zoning restrictions such as setback limits, height and parking requirements and application fees interfere with private owners right modify a home, reduce the possibility of a non-profit developer building small house living, pocket neighborhoods or Micro-Unit house. The flexibility to build low “density” homes with a small footprint would under current zoning regulations require a zoning variance. This perpetuates the imbalance of property ownership. The fewer affordable housing options built means fewer low- and moderate-income households will benefit from the “generational wealth” that white middle class households take for granted. Without loosening of CT residential zoning practices, the cost-of-living index be a factor for retirees. Seniors, empty-nesters, and young professions looking to own a low maintenance property will look to leave the town or state or demand lower taxes and/or senior tax rebates.

According to the CT Planning & Zoning Statutes Sec. 8-2 specifically requires municipality and zoning boards to “encourage the housing opportunity including multi-family dwellings....promote housing choice and economic diversity in housing for both low- and moderate-income households, and also encourage the development of the housing needs identified and the housing plan prepared pursuant to section 8-37t and in the housing component and the other components of the state plan of conservation and development prepared pursuant to section 16a- 26”. The full regulation can be view as compiled by the CT OPM and linked to OPM webpage as a document named Compendium of Planning and Zoning Statutes.

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

Offer housing counseling services, fully staff offices of social service and zoning enforcement, use CDBG funds toward allowable costs to develop new residential housing units for sale or rent, require federal funds to be allocated to both security deposit, and rental and mortgage programs, and create an employment training center. Milford is a civic minded community who regularly volunteer and participate in local fundraising events that benefit of residents living at or below low- and moderate-income levels.

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

The housing program assisted several owners with the cost to improve or repair their homes. No LBP tests were

required because no chipping or peeling paint evident, or no paint existed at the sight of the repair, or the home was built after 1978. All applicants participating in the CDBG residential housing repair program must receive the Lead Based Paint pamphlet "Protect your family from lead in your home" and be tested if necessary. All lead test costs and construction labor to stabilize or remediate the home is free to the owner. Homes built before 1978 are first inspected for chipping or peeling paint in or near the project area if it is found or work may disturb the paint, a lead-based paint (LBP) tests will be completed. A positive test requires the paint be stabilized or remediated using EPA Renovation Repair Painting (RRP) by a certified contractor. If a home, with a child six or younger, tests positive lead, or a child six and under has an elevated lead blood level, lead abatement procedures will be enforced. LBP inspection and tests are performed at no cost to the owner as it is a requirement of the U.S. Department of Housing and Urban Development. Labor involved in a CDBG residential lead stabilization or abatement is free to the owner but all equipment and materials such as new windows are cost incurred by the owner. A written LBP test results and assessment report(s) are kept in the owner's project file and the owner receives a report to prevent future issues and to disclose at the time property sale.

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

The CDBG public service budget is funded at the 15% cap each year. Residents have access to the Department of Human Service counseling programs, energy assistance and a multitude of other programs; the Public Library offers programs and services such as book discussions, speakers, craft classes, and a public computer lab; the Milford Adult Education program offers the State mandated ESL program classes; the Literacy Center of Milford provides tutors to assist to improve English speaking, reading and/or writing skills; and the senior center runs a food bank to assist seniors on a fixed income; improvements to public facilities and sidewalks increase accessibility and social interaction; and Liberty Point Housing and the Beth El Center provide housing and support services to assist clients gain the skills needed to regain self-sufficiency.

Other local organizations offer programs and assistance to families at poverty level include; United Way of Milford, Bridges Healthcare, BHCare court advocate, Boys and Girls Club childcare, City Departments, the Adult Education, local churches, 2-1-1 Information, the Red Cross and Salvation Army and Boys and Girls Village, and the Collaborative for Residential Integrity of the Disabled & Elderly (CRIDE) addresses the behavior of hoarding and the sub-standard housing conditions and daily hardship it creates for families.

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

Processes and procedures are in place to ensure CDBG funds are publicized, allocated, managed, and expended in accordance with HUD regulations. The CDBG manual is in the process of being updated with new program information and HUD regulations.

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

Efforts are made to coordinate and market housing programs by the CDBG Administrator. Distribution of programs takes place at monthly meetings, mail and emailing flyer and brochure twice a year, and sharing of latest information and HUD news at public hearings. Department of Health and Human Services holds a monthly Social Service Network Meeting and the Collaborative for Residential Integrity of the Disabled & Elderly (C-RIDE) which address hoarding and derelict housing conditions to address City Health Code and Blight Ordinance. DHHS receives CDBG funds to provide Subsistence Payment Assistance to residents.

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

The 2020 Analysis of Impediments to Fair Housing Choice identified the following impediments:

1. Fair Housing Education and Outreach

The 2020 Consolidated Plan Survey shed light on resident's understanding of fair housing discrimination. In response, the Milford Fair Housing Officer created a webpage specific to fair housing laws and tenant landlord rights. If information or an incident are discriminatory in nature, the Fair Housing Officer will attempt to resolution on behalf of the party making the complaint. If unsuccessful, assistance to file a complaint with HUD and/or CT Fair Housing Association will be provided. Tenant circumstances centered on from rent increases, non-renewal of a lease. In all three cases the landlord's actions could not be specifically tied to a tenant violation or a fair housing complaint. The proposal to present a "fair housing sense" workshop to educate and engage property owners and tenants about housing laws was researched prior to the pandemic. With heightened visibility by CT Fair Housing Center and the new requirement for a municipal Fair Rent Commission the proposal will be revisited in 2023.

The CDBG Administrator created and updates a list of affordable 8-30g deed restrictive housing, federally subsidized and public housing affordable rental and owner-occupied units. This can be done if and Zoning officials provide information on new zoning applications and 8-30g set aside property manager submit an annual certification of set-aside units (8-30g) with current property management contact and location information. Doing so creates public access and transparency and reduces barriers to low- and moderate-income households. Links to all information <https://www.ci.milford.ct.us/economic-and-community-development/pages/cdbg-housing-programs-and-fair-market-rent-fmr-income>

2. Quality of Housing vs. Affordability. A female resident called and emailed several times to ask for assistance and update me. Initially, the issue was presented as a tenant complaint not discrimination. During the three months she was in contact with the office, the woman shared that her husband had a disability, due to her husband's health she could not work during the pandemic, she alluded to being at or nearly 62 years of age, and her son was in college. The landlord increasing the rent and she could not afford it and refused to pay. Having not paid the increase or the rent, the landlord sent a notice to quit (vacate). I advised her to document all correspondence in writing and pay rent while looking for another apartment. The woman was not eligible for rental assistance. Not finding an apartment in Milford to rent, she sought free legal assistance. Though she wasn't income eligible, the attorney represented her at the eviction hearing because one of the adults was protected under the CT Statute - No Fault Evictions law prohibiting eviction of a renter, 62 years, or older and disabled persons, and residing in a building with 5 or more units. The court dismissed the eviction notice and ordered the family to pay the overdue rent in 5 days to remain in the property. The woman withdrew retirement income to pay the overdue rent. As a CDBG Administrator and acting Fair Housing Officer, I was not aware of the No Fault Eviction law. It was mentioned by Fair Housing presenters at three different forums attended between August 24, 2022, and November 16, 2022. It is not stated in the CT Fair Housing Center website.

During the FY2021-22 the office and Fair Housing Officer received several emails and phone inquiries regarding housing: Residential Housing Repair Program (45), Security deposit (26), Fair Housing/Tenant Landlord (4), Affordable housing (18), Rental Assistance (9), First Time Homebuyer (10), Homeless (3), 8-30g units/limits (4), PHA waiting list (4).

CDBG funds are available to property owners of single family, multifamily to improve home conditions is available annually. Modernization of the public housing by the MRHP continues but at a slow pace due to available funding. The supply of privately owned state defined affordable housing is mostly new.

3. Lack of Quality Affordable Housing for Home Buyers. The State of CT, Department of Housing recognized and funded a down payment assistant program in 2022. CDBG funds are available most program years for the First Time Homebuyer Program if an eligible household finds a home to buy in Milford. City. In 2022, one family received DBA and closing cost assistance. The buyer received an FHA loan. The home condition was “satisfactory” except for the roof, which will be replaced with CDBG funds. A foreclosure (Lis Pen Dens) list is prepared by the City Clerk. The mayor’s office mails Mortgage Foreclosure Prevention programs to the homeowners to advise how to mitigate a foreclosure. Between January and May 2022, the clerk reported 20 foreclosure notices. In 2021, 46 foreclosure notices were reported, in 2020 Milford reported 65 foreclosure notices and 73 foreclosure notices reported in 2019.

4. Continuing Need for Accessible Housing. New housing units may include “accessible” features if it is anticipated older adults or disabled persons will reside in the space. Over 45% of the City’s housing stock was built over 60 years ago and does not have accessibility features. To serve elderly and disabled residents accessibility improvements to public facilities and residential home is encouraged. New owner-occupied senior housing is needed. In 2019 24.1% of Milford residents were 62 years or older, and 10.4% of the population were classified as disabled. The Americans with Disability Act (ADA) requirements does not require new residential construction or modification adhere to the federal law.

5. Economic Issues Affecting Housing Choice. The public library offers a computer lab and host the WorkPlace mobile Career Center several times during the program year. CDBG funds were allocated to employment training classes being offered at the Milford Adult Education Program and literacy program. Support of a designated workforce development and skill training program provides workers the opportunity to cross train and learn skills necessary for employment both service and non-service jobs. A well-trained pool of workers can help to reduce CT unemployment rates and stabilize housing.

CR-40 - Monitoring 91.220 and 91.230

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

Standards and Program Compliance

The CDBG program administrator prepares all annual reports, budgets, and process financial transactions; manages IDIS activity reporting and grant disbursements; the annual NOFA notice, application and public participation process, technical assistance, subrecipient activity monitoring, supervises a part time clerk, project bid process, coordinates the oversight of a project manager, compliance with program requirements and timely expenditures to meet the HUD ratio by August 2nd each year. (PR56 CDBG Timeliness Report).

CDBG grantees sign a Subrecipient Agreement to accept a CDBG award. The Agreement specifies HUD regulations, CDBG requirements and City policy as the framework to accomplish the activity and program year expenditure deadline. The CDBG staff emails reporting and expenditure reminders, if necessary, provides technical assistance, monitors, requests attendance at public hearing(s), shares program, HUD news and updates on funding.

The CDBG Administrator holds two public hearings during the program year. One public hearing is held during the NOFA public participation process. The second public hearing can be held either, at time the Annual Action Plan 30-day comment period is published or during the CAPER 15-day public comment process. The second public hearing invites the public, CDBG Subrecipients and local agencies to inquire on proposed grant awards and/or CAPER outcomes, general program requirements and be provided HUD news.

Industry membership, involvement and outreach is important. The CDBG Administrator attends HUD sponsored CDBG training and Roundtables, reviews the HUD regulations and industry literature, and is a member of the NCDA. Regular attendance at annual forums and monthly meeting held by organizations such as the Partnership for Strong Communities, Open Communities Alliance, HUMANS Network, Milford Social Services Meeting, all in for Milford, CT Fair Housing Center, and the CT Coalition to End Homelessness, CT Conference for Municipalities and Southern CT Regional Conference of Government (SCRCOG) and State of CT hearings.

Program Monitoring

Due to COVID-19, subrecipient monitoring was not conducted during the program year. A subrecipient monitoring for regulatory and program performance will take place in 2023 and follow the monitoring process with the intention of facilitating organizational growth and the value of data and reporting to secure additional funding resources for their program.

In 2022, HUD CPD office conducted a financial risk assessment and determined Milford was not at risk and no monitoring would be necessary.

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

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

The 2020 Citizen Participation Plan now includes some of the waivers cited in the letter from John Gibbs, Assistant Secretary, Acting, "Availability of Waivers of Community Planning and Development (CPD) Grant Program and Consolidated Plan Requirements to Prevent the Spread of COVID-19 and Mitigate Economic Impacts COVID-19" on 2020-03-31.

To encourage comment, transparency, and inclusivity the CDBG public process is noticed in the local newspaper, posted on the city website, and available to review in the ECD office and the library. Notices are emailed to area communities, the Milford Housing & Redevelopment Agency and local non-profit agencies key in the consultation and review. Virtual hearings by Zoom continue to be held to protect individuals with underlying medical conditions. The city follows the CT Public Health and CDBG recommendations. Employees are offered vaccines, suggest test if symptomatic, and/or follow social distancing and masks in public spaces as recommended by the CDC.

Any written comments received during the public comment period, or a public hearing will be included in the Appendix with the public notice, public hearing agenda and minutes and submitted to HUD within the 90-day reporting period requirement.

CR-45 - CDBG 91.520(c)

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

Grant allocations toward a wide variety of housing programs offer the greatest opportunity to assist the largest number of Milford low- and moderate-income households' stabilize and/or secure housing and benefit from fair housing practices. Efforts to hire a dedicated staff person to administer the CDBG housing programs will be sought in early 2023.

Formation of a Community Based Development Organization (CBDO) or Community Development Corporation (CDC) for the purpose facilitating the creation affordable homeownership housing options such as mixed-use condominium, small house green "pocket" neighborhoods, or other, by a non-profit developer of residential housing. Section 108 program is a viable finance option with a viable proposal and fully vetted developer.

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

No, it does not have any open Brownfields Economic Development grants.

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

Not applicable.

CR-58 – Section 3

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

CDBG 24CFR Part 75.15(b); 75.25(b)

Total Labor Hours	CDBG	HOME	ESG	HOPWA	HTF
Total Number of Activities	0	0	0	0	0
Total Labor Hours					
Total Section 3 Worker Hours					
Total Targeted Section 3 Worker Hours					

Table 8 – Total Labor Hours

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

Table 9 – Qualitative Efforts - Number of Activities by Program

Narrative

The City of Milford did not expend \$200,000 or more of its HUD federal grant in FY2021-22 to build or rehabilitate housing, on construction to improve infrastructure or a public facility. The Section 3 program is in place to ensure that HUD grantees, recipients of the federal funds, provide direct employment, training and/or contracting opportunities to low and very low-income persons and businesses “to the greatest extent possible”. Section 3 is a provision of the HUD Act of 1968 and is found at 12 U.S.C. 1701u. The regulations are found at 24 CFR Part 75.

Total Labor Hours: 0

Qualitative Efforts – Number of Activities by Program: 0

In 2021, the HUD CPD program office was charged with management and monitoring of Section 3. The Section 3 Summary Report is now submitted as part of the Consolidated Annual Performance Report in IDIS. Reporting in SPEAR via the REAC system is no longer required.

ATTACHMENTS

IDIS Reports PR03 Activity Summary Report (CDBG & CDBG-CV)

IDIS Reports PR02 List of Activities by Program Year and Project (CDBG & CDBG-CV)

IDIS Reports PR23 Summary of Accomplishments (CDBG & CDBG-CV)

IDIS Reports PR26 Financial Summary Report (CDBG & CDBG-CV)

Public Notice with any written comments received

Project Pictures, if available.