

## **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.

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The Consolidated Plan is designed to help local jurisdictions assess their affordable housing and community development needs. The consolidated planning process services as the framework for a community-wide dialogue to identify housing and community development priorities. In the Consolidated Annual Performance and Evaluation Report (CAPER), grantees report on accomplishments and progress toward Consolidated Plan goals in the prior year.

This is the first year of the 2020-2024 Consolidated Plan. During the 2020 Program year the City of Oshkosh invested over \$1 million of its Federal housing and community development block grant funds and program income in the community's future. Completed projects and activities met the objectives of the 2020-2024 Consolidated Plan and 2020 Annual Action Plan through creation of suitable living environments; providing safe, decent, affordable housing; and creating economic development opportunities. The program year was challenging for many of the subrecipients due to the COVID pandemic during much of 2020 and into 2021. Oshkosh's overall numbers may appear lower than during typical reporting periods, but City staff worked with, and continues to work with, local, state and federal agencies in providing needed services to LMI households and persons in the community during these trying times.

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

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

Goal	Category	Source / Amount	Indicator	Unit of Measure	Expected – Strategic Plan	Actual – Strategic Plan	Percent Complete	Expected – Program Year	Actual – Program Year	Percent Complete
AM-1 CV Overall Coordination	Planning	CDBG-CV: \$	Other	Other	1	0	0.00%	1	0	0.00%
AM-1 Overall Coordination	Administration, Planning, and Management	CDBG: \$	Other	Other	5	1	20.00%	1	1	100.00%
CD-1 Community Facilities and Infrastructure	Non-Housing Community Development	CDBG: \$	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	Persons Assisted	0	0				
CD-2 Public Safety	Non-Housing Community Development	CDBG: \$	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	0	0				
CD-3 CV Public Services	Homeless Non-Homeless Special Needs Non-Housing Community Development Community development	CDBG-CV: \$	Public service activities for Low/Moderate Income Housing Benefit	Households Assisted	50	0	0.00%	50	0	0.00%

CD-3 CV Public Services	Homeless Non-Homeless Special Needs Non-Housing Community Development Community development	CDBG- CV: \$	Homeless Person Overnight Shelter	Persons Assisted	50	0	0.00%	50	0	0.00%
CD-3 CV Public Services	Homeless Non-Homeless Special Needs Non-Housing Community Development Community development	CDBG- CV: \$	Overnight/Emergency Shelter/Transitional Housing Beds added	Beds	4	0	0.00%	4	0	0.00%
CD-3 CV Public Services	Homeless Non-Homeless Special Needs Non-Housing Community Development Community development	CDBG- CV: \$	Homelessness Prevention	Persons Assisted	20	0	0.00%	20	0	0.00%
CD-3 Public Services	Non-Housing Community Development	CDBG: \$	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	5000	4819	96.38%	1000	4819	481.90%

CD-3 Public Services	Non-Housing Community Development	CDBG: \$	Public service activities for Low/Moderate Income Housing Benefit	Households Assisted	0	0		0	0	
CD-3 Public Services	Non-Housing Community Development	CDBG: \$	Homeless Person Overnight Shelter	Persons Assisted	0	154		0	154	
CD-3 Public Services	Non-Housing Community Development	CDBG: \$	Overnight/Emergency Shelter/Transitional Housing Beds added	Beds	0	0		0	0	
CD-4 Accessibility	Non-Housing Community Development	CDBG: \$	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	Persons Assisted	0	0				
CD-5 Clearance/Demolition	Non-Housing Community Development	CDBG: \$	Buildings Demolished	Buildings	5	6	120.00%	1	6	600.00%
ED-1 Employment	Economic Development	CDBG: \$	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	0	0				
ED-1 Employment	Economic Development	CDBG: \$	Jobs created/retained	Jobs	0	0				
ED-2 Redevelopment	Economic Development	CDBG: \$	Buildings Demolished	Buildings	15	0	0.00%	3	0	0.00%

ED-3 CV Emergency Micro-enterprise Fund	Economic Development	CDBG-CV: \$	Jobs created/retained	Jobs	15	0	0.00%	15	0	0.00%
ED-3 Financial Assistance	Economic Development	CDBG: \$	Businesses assisted	Businesses Assisted	0	0				
ED-4 Access to Transportation	Economic Development	CDBG: \$	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	Persons Assisted	0	0				
HO-1 Housing	Homeless	CDBG: \$	Homelessness Prevention	Persons Assisted	0	0				
HO-2 Operation/Support	Homeless	CDBG: \$	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	0	0				
HS-1 Housing Support	Affordable Housing Public Housing	CDBG: \$	Direct Financial Assistance to Homebuyers	Households Assisted	10	2	20.00%			
HS-2 Housing Construction	Affordable Housing	CDBG: \$	Rental units constructed	Household Housing Unit	0	0				
HS-2 Housing Construction	Affordable Housing	CDBG: \$	Homeowner Housing Added	Household Housing Unit	0	0				

HS-3 Housing Rehabilitation	Affordable Housing	CDBG: \$	Rental units rehabilitated	Household Housing Unit	12	0	0.00%	10	0	0.00%
HS-3 Housing Rehabilitation	Affordable Housing	CDBG: \$	Homeowner Housing Rehabilitated	Household Housing Unit	70	12	17.14%	14	12	85.71%
SN-1 Housing	Non-Homeless Special Needs	CDBG: \$	Public service activities for Low/Moderate Income Housing Benefit	Households Assisted	0	0				
SN-2 Social Services	Non-Homeless Special Needs	CDBG: \$	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	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.**

During the 2020 Program Year, the City of Oshkosh's use of CDBG funds was consistent with the goals, priorities and objectives described in both its 2020-2024 Consolidated Plan and its 2020 Annual Action Plan. The City's priorities in 2020 were affordable housing through its housing rehabilitation and downpayment assistance program (\$434,874 spent during the program year), acquisition and demolition of slum and blight properties (\$204,910); and provided funding assistance to 12 public service agencies (\$126,699) to provide direct needed services to low and moderate income persons / households in the community, including the local warming shelter that provides support services to individuals

experiencing homelessness.

The City did not meet the goal of acquiring and rehabilitating one single family home within a neighborhood association during the 2020 Program Year. The condition of the properties acquired during this program year did not warrant rehabilitation and the properties were demolished.

The City's average number of owner occupied homes that are rehabilitated during a given program year has been decreasing over the past five years. Thirteen homes were rehabilitated during the 2020 Program Year and downpayment assistance provided to two homebuyers. While the timeliness of the award and release of funding is beyond discretionary control, and some homeowners who were tentatively approved withdrew from the program, the City intends to continue the housing improvement program to provide safe, decent, affordable housing options for low to moderate income persons and households.

One of the public service agencies funded by the City is the Day by Day Warming Shelter which is open from October to April, and has a limited 25 bed temporary facility. The Warming Shelter has had to turn away individuals seeking shelter due to the limited beds. However, other agencies not funded by the City also provide overnight emergency shelter for homeless individuals, but those numbers are not included within this report. If those uncounted additional beds were included, the number of persons seeking shelter would exceed the anticipated 500 homeless persons assisted during the program year.

All projects and activities carried out by the City during the 2020 program year utilized 2020 CDBG entitlement funds, as well as prior years funds not yet spent. Program income received from repayment of housing rehabilitation loans and vacant lots sold, is placed in a Revolving Loan Fund account and those funds are spent on approved housing rehab projects before the current year CDBG funds allocated for housing improvements is spent. The City of Oshkosh does not receive HOME funds.

## CR-10 - Racial and Ethnic composition of families assisted

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

91.520(a)

	CDBG	HOME
White	28,812	0
Black or African American	4,318	0
Asian	1,977	0
American Indian or American Native	380	0
Native Hawaiian or Other Pacific Islander	51	0
<b>Total</b>	<b>35,538</b>	<b>0</b>
Hispanic	1,578	0
Not Hispanic	50,789	0

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

### Narrative

Three additional family compositions were not populated in the above table.

Black/African American & White 41

Amer Indian/Alask Ntive & Black/African Amer 7

Other Multi-Racial 16,776

For a total of 52,367 families assisted during the program year. This number coincides with the number of CDBG Beneficiaries by Racial/Ethnic Category on the PR 23 Summary of Accomplishments in the Appendix.

In all cases the numbers reported are individuals. In some cases, depending on the activity, those individuals are reported as female head of household, elderly or handicapped and may represent other individuals in the household.



## 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	840,914	859,937
HOME	public - federal	0	0
Other	public - federal	787,421	

**Table 3 - Resources Made Available**

### Narrative

The 2020 CDBG allocation was \$840,914. Revolving loan fund program income (\$202,778) received during the 2020 PY was spent on housing rehabilitation projects undertaken during the program year.

Funds expended during the program year (\$859,937) also include funds awarded to activities/projects in prior years that were not spent until the 2020 program year. For example, housing rehab projects may span the course of a couple of program years depending on when a rehab project is approved and when the work is completed.

### Identify the geographic distribution and location of investments

Target Area	Planned Percentage of Allocation	Actual Percentage of Allocation	Narrative Description
Oshkosh Priority Areas	82	100	City-wide

**Table 4 – Identify the geographic distribution and location of investments**

### Narrative

In the 2020 Program Year, the City continued to target its investments in low to moderate income census tracts, neighborhoods with recognized neighborhood associations, and neighborhoods impacted by slum and blight properties. The housing rehabilitation program is offered city-wide to LMI income eligible households. 58.68% of the 2020 program year expenditures were spent on benefitting low to moderate income persons/households. Any carry over funds from the 2020 Program Year will be spent in the coming program year on programs/activities as approved in the 2020 Action Plan.

## 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.**

During the 2020 Program Year, CDBG funds were used to leverage additional public service funds as the City continued to partner with Oshkosh Area United Way and Oshkosh Area Community Foundation – known as the Public Service Consortium. A total of \$118,000 in CDBG funds was available for public service activities during the 2020 Program Year. Twelve agencies were funded during the program year. Over \$3.6 million in matching funds was leveraged from the agencies funded. Refer to the 2020 Oshkosh Public Service Consortium Funding Worksheet in the Appendix.

<b>Fiscal Year Summary – HOME Match</b>	
1. Excess match from prior Federal fiscal year	0
2. Match contributed during current Federal fiscal year	0
3. Total match available for current Federal fiscal year (Line 1 plus Line 2)	0
4. Match liability for current Federal fiscal year	0
5. Excess match carried over to next Federal fiscal year (Line 3 minus Line 4)	0

**Table 5 – Fiscal Year Summary - HOME Match Report**

Match Contribution for the Federal Fiscal Year								
Project No. or Other ID	Date of Contribution	Cash (non-Federal sources)	Foregone Taxes, Fees, Charges	Appraised Land/Real Property	Required Infrastructure	Site Preparation, Construction Materials, Donated labor	Bond Financing	Total Match
n/a	0	0	0	0	0	0	0	0

Table 6 – Match Contribution for the Federal Fiscal Year

**HOME MBE/WBE report**

Program Income – Enter the program amounts for the reporting period				
Balance on hand at begin-ning of reporting period \$	Amount received during reporting period \$	Total amount expended during reporting period \$	Amount expended for TBRA \$	Balance on hand at end of reporting period \$
0	0	0	0	0

Table 7 – Program Income

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

**Table 8 - Minority Business and Women Business Enterprises**

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

**Table 9 – Minority Owners of Rental Property**

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

**Table 10 – Relocation and Real Property Acquisition**

## CR-20 - Affordable Housing 91.520(b)

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

	One-Year Goal	Actual
Number of Homeless households to be provided affordable housing units	0	0
Number of Non-Homeless households to be provided affordable housing units	14	12
Number of Special-Needs households to be provided affordable housing units	0	0
<b>Total</b>	<b>14</b>	<b>12</b>

Table 11 – Number of Households

	One-Year Goal	Actual
Number of households supported through Rental Assistance	0	0
Number of households supported through The Production of New Units	0	0
Number of households supported through Rehab of Existing Units	14	12
Number of households supported through Acquisition of Existing Units	2	2
<b>Total</b>	<b>16</b>	<b>14</b>

Table 12 – Number of Households Supported

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

CDBG funds are used to foster and maintain affordable housing primarily through the owner occupied and rental rehabilitation programs. The City did not receive any applications for rental rehab assistance during the program year.

The City also addresses housing needs of the community through public service activities. The funding of organizations that include the Advocap Bridges Emergency Assistance Program, Day by Day Warming

Shelter and Christine Ann Shelter provide a support network for those in unfit housing or finding themselves displaced. The City will continue to fund these types of public service agencies in future years as long as CDBG funding is available.

The City's average number of owner occupied homes that are rehabilitated during a given program year has decreased over the term of this Consolidated Plan. Twelve homes were rehabilitated during the 2020 Program Year and downpayment assistance was provided to one homebuyer. The City is not sure why there has been a decline in the interest of this program, but the City intends to continue the housing improvement program to provide safe, decent, affordable housing options for low to moderate income households. The City may consider changes to the program to address more exterior work than interior work, especially given the pandemic crisis during the 2020 program year which prevented contractors from working on projects all together for several months.

**Discuss how these outcomes will impact future annual action plans.**

The City will continue to fund public service activities, and the housing improvement program, as well as provide downpayment assistance/closing costs assistance to income eligible homebuyers to make significant progress in its goal of creating and preserving affordable housing in the City.

**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.**

<b>Number of Households Served</b>	<b>CDBG Actual</b>	<b>HOME Actual</b>
Extremely Low-income	3	0
Low-income	2	0
Moderate-income	7	0
<b>Total</b>	<b>12</b>	<b>0</b>

**Table 13 – Number of Households Served**

**Narrative Information**

The City’s housing improvement program benefits low to moderate income households. Public Service funded activities are presumed to benefit low and low to moderate income persons.

## **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**

Housing and support services for the homeless are provided by a local network of public and private agencies. The City assists with funding of these activities through the Public Services Consortium.

ADVOCAP deals with homelessness through its Homeless Programs Department and is taking the leadership role in actively pursuing, obtaining and administering federal funding to address local homeless needs. The agency has a HUD Supportive Housing Program (Supportive Services Only) award to provide intensive case management and wraparound services to work with homeless persons and families access permanent housing, obtain employment or increased income and achieve greater self-sufficiency through their overcoming barriers. The agency also serves as the fiscal agent for state-funded homeless prevention programs (State of Wisconsin HUD ESG, State Transitional Housing and State Homeless Prevention Program Funds). ADVOCAP coordinates a twice a year point-in-time survey of homelessness in the area, which local agencies participate in.

ADVOCAP also operates a homeless prevention program known as the "Bridges Emergency Assistance Program", which provides assistance to LMI persons who had temporary emergency needs related to rental and utility payments, bus passes, gas vouchers, car repairs, work boots, insurance application fees and vouchers.

During the 2015 program year, the local warming shelter (Day by Day) developed a resource coordination program to assist guests from their initial intake to progressions and completion of goals promoting independence, stability and self sufficiency. The program was successful and has continued to operate during the 2020 program year. The program is designed to improve quality of life by giving chronically homeless adults a place to receive coordinated assistance to help meet their needs without the stigma of having to make trips to multiple agencies.

ADVOCAP and Day by Day Warming Shelter conducted a point in time count in July, 2020 and January, 2021. As part of the point in time count, sheltered and unsheltered needs and demographics were collected, and blankets, personal care items, clothing and services information were provided. During the July, 2020 count, 10 homeless individuals were found to be sleeping in areas unfit for human habitation.

### **Addressing the emergency shelter and transitional housing needs of homeless persons**

There are 207 emergency and transitional beds available for men, women and children :



- ADVOCAP has two units of transitional housing (16th Avenue & Mt Vernon Avenue homes)
- Christine Ann Domestic Abuse Services Inc. operates a 35-bed shelter for female victims of domestic violence and their children.
- Day by Day Warming Shelter operates a 25-bed seasonal emergency shelter that serves a small but definite population of men and women
- Father Carr's Place 2B operates 75 beds for women and children.
- Additionally, Father Carr's operates 75 beds for men only.

The Salvation Army also provides emergency motel vouchers during periods when the shelters are full. They also provide rent and utility help for those unable to obtain assistance through other services.

**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**

A variety of efforts were undertaken by the City and CoC agencies to prevent homelessness. Through monthly meetings these varied perspectives, challenges, resources and successes are shared and cross cutting solutions developed. The primary preventative services offered by different provider organizations included emergency fuel assistance and food and meals programs, emergency rental assistance, financial assistance, utility assistance, housing relocation and stabilization services, counseling/advocacy and legal assistance. Each service sought to help families in their home by offering services and support during times of financial and legal difficulty. Clients were offered followup case management services consisting of but not limited to, creating and maintaining an accurate budget, assistance increasing income (e.g. applying for public benefits), connecting to community resources (e.g. food pantries and clothing programs), and other referrals driven by the needs of goals of the client.

CDBG Public Service Consortium funds helped community providers and residents access services, information, prevention and referral.

**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 WinnebagoLand Housing Coalition meets monthly to facilitate conversations and coordinate efforts amongst the many separate agencies serving homeless, veterans, youth, families, housing and shelter

providers, and at risk support providers, to develop systems that address the individual and complex needs of Oshkosh residents experiencing homelessness. The group includes homeless service providers, local government, Housing Authority, United Way, faith based groups and others concerned with housing issues, as well as the local COC. Homeless service providers also maintain continuing contact with other agencies that may not be active members of the Housing Coalition to facilitate homeless participants accessing services in a timely manner or to assure appropriate referral of persons by other agencies, county mental health agencies, and Family Services.

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

### **Actions taken to address the needs of public housing**

Oshkosh/Winnebago County Housing Authority works to promote and deliver adequate and affordable housing and suitable living environments free from discrimination. Their mission is to promote and ensure safe, decent, and affordable housing for their participants, as well as provide owners and developers with an opportunity to rehabilitate and develop affordable housing.

Formed in 1970, the Housing Authority owns, manages and maintains 616 housing units that are subsidized with rents based on 30% of adjusted incomes, of which 471 are in the City of Oshkosh. The properties range from scattered site single family homes to 14-story high rise buildings. Affordable housing opportunities are available for families, singles, disabled, and elderly low-income applicants. The Authority also administers over 400 Housing Choice Vouchers, owns and maintains a group home, and coordinates a family self-sufficiency program.

The Housing Authority recognizes their participants as their primary focus, works in partnership with community and government organizations to promote affordable housing options, acts as an agent of change when performance is unacceptable, continues to strive for public trust and confidence through good communication and being responsive to the needs of their participants and the community, and identifies and works to eliminate barriers that prevent it from achieving their goals as a housing authority.

The City will continue to support the Housing Authority as public housing project needs are identified.

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

The Housing Authority encourages its residents to participate in various activities and programs to improve themselves and make themselves more self-sufficient. The local FISC office offers homebuyer education classes and credit counseling for those residents interested in homeownership. The City would provide downpayment assistance to income eligible homeowners. The Housing Authority may also provide downpayment assistance utilizing HOME funds.

The Authority offers a Family Self-Sufficiency (FSS) program to help housing choice voucher and public housing family unit recipients attain self-sufficiency through education advancement, employment skill development, access to community resources, home ownership opportunities and development of financial assets with the goal of improving their family's financial situation and overall quality of life.

### **Actions taken to provide assistance to troubled PHAs**

The Oshkosh/Winnebago County Housing Authority is not a troubled housing authority.

## **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)**

Specific actions were taken to remove or ameliorate the negative effects of public policies that serve as barriers to affordable housing including providing land for a variety of housing types, review of zoning and land use updates, continuing to educate the public on the need for affordable housing, and offered a diversity of affordable housing programs.

The City has contracted with the Milwaukee Fair Housing Council for several years and the City's Fair Housing Ordinance was revised to reflect the current structure for investigation and disposition of complaints through a third party contractor (Fair Housing Council) as needed.

The City of Oshkosh continues to administer a voluntary Residential Rental Registration and Inspection program. The City-wide program is voluntary and provides for the registration and inspection of residential rental dwelling units in the City to ensure units provide safe, decent and sanitary living conditions for tenants and to prevent further deterioration of those units. This program went into effect January 1, 2018.

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

City staff participates in monthly meetings of the Winnebago Land Housing Coalition, of which the local Continuum of Care is a participant. This coalition includes members from United Way, the Oshkosh/Winnebago County Housing Authority, Habitat for Humanity, and several other housing related service providers such as ADVOCAP, The Salvation Army, Day by Day Warming Shelter, Father Carr's Place 2 Be and the American Red Cross.

Several internal City departments such as Public Works, Forestry, and Police have participated in implementation and planning efforts including neighborhood watch and neighborhood association planning, and neighborhood improvements, as well as the City-wide eligible owner occupied housing improvement program. With City staff coordinating implementation with other departments and outside agencies, any potential obstacles are being addressed on tailored approach versus a one-size fits all approach.

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

The City continues to implement applicable HUD lead paint regulations in owner and renter-occupied housing rehabilitation projects. The City collaborates with the County Health Department to provide CDBG rehabilitation assistance to income qualified owner-occupied households with children who have

elevated lead blood levels. The City's Housing Rehabilitation Specialist is trained to use the City's XRF lead testing machine.

In every assisted project, the participants, whether homeowners, renters, landlords or contractors, are notified and advised of the hazards of lead based paint. All contractors used to perform lead hazard reduction work must be trained and certified by the State in a lead hazard reduction discipline and associated with a certified lead company. The City prefers to work with State Certified general contractors as part of the housing improvement programs, as most projects disturb lead based paint or control/abate lead paint hazards. However, the general contractor may subcontract the lead work to a certified lead contractor.

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

In considering the factors affecting poverty that may be impacted by the existing housing programs of the City, it appears that coordination of production and preservation of affordable housing as well as the Public Service programs and services targeted to special needs populations benefit and help to reduce the numbers of families below the poverty level. While these activities may not increase the income of these persons, the activities aid in reducing their cost burden.

The City will be reducing the housing cost burden on these households to some extent in completing rehabilitation projects on properties owned by households below the poverty level limits. The reduction in housing cost burden will result from actions that reduce energy costs and reduce the cost of repairs needed to keep the home in habitable condition. The City recognizes that while this in itself will not increase the level of income of these households, it will make more domestic funds available to cover other expenses.

Additionally, the City requires owner-occupants applying for CDBG housing rehabilitation programs who have a large volume of debt to participate in free budget counseling as a condition of housing rehabilitation loan approval. This policy is based on the position that the rehabilitation loan is a partnership effort with the City and bringing the house into livable condition while attempting to ensure that the owner is in a financial position to keep up the home may reduce the possibility of the house falling into future disrepair.

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

The City of Oshkosh's institutional structure for carrying out activities under the Consolidated Plan is in place and working well. It includes coordination and cooperation with local, state and federal agencies and organizations, as well as close interaction amongst internal departments. Effective coordination exists among non-profit organizations involved in the delivery of supportive housing servicers, food bank/pantry, health and emergency shelter. The City has increased relationship building with these organizations and within the community by actively working with neighborhood associations, community groups, service providers, economic development agencies, area schools, private investors,

non-profits and others to connect common interests for the greatest benefit.

Collaborative efforts during the program year included working with neighborhood associations and residents to communicate needs, identify priorities, define and implement CDBG projects that meet needs of LMI households. The City recognizes coordination and information sharing as critical to the success of its activities and continues to seek and foster opportunities for increased collaboration.

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

Housing and social service providers collaborate regularly through participation in the Winnebago Land Housing Coalition monthly meetings. A City staff person attends these meetings as the City's liaison. These meetings include representatives from agencies who provide housing services, such as emergency assistance, weatherization, homebuyer assistance, and non-housing services, such as employment training, mental health counseling, veterans services, elderly services, and health services. Through these monthly meetings these varied organizations share resources and information to develop inter-agency housing and service solutions.

The Oshkosh/Winnebago County Housing Authority and local Habitat for Humanity also offer downpayment assistance to income qualified homebuyers. Participants must complete a homebuyer class from a certified housing counselor. Upon completion of the course, homebuyers are eligible to receive up to \$10,000 in CDBG funds from the City for down payment assistance or offset closing costs. The Housing Authority and Habitat may also provide downpayment assistance.

With declining public funding at the State and Federal level for housing and social service agencies, City staff and local officials continue to work with agencies to identify alternate funding sources which will enable them to meet a larger portion of the community's needs. Such sources may include funding from other federal or state agencies, or the private sector.

**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 City approved an Analysis of Impediments to Fair Housing Choice in 2020. This Plan was updated during the 2019 and 2020 program years, and approved by the City in 2020. The 2020 AI identified 4 impediments. Staff continues to address these impediments. Implementation efforts for most of the action steps have been completed; others will be implemented in the near term.

Actions taken during the program year to address these impediments include:

- The City of Oshkosh revised its Fair Housing Ordinance in 2016 to include transgender individuals as a protected class. The City has contracted with the Milwaukee Fair Housing Council for several years, and the City's Fair Housing Ordinance was revised to reflect the current structure for investigation and disposition of complaints through a third party contractor (Milwaukee Fair Housing Council) as needed.
- Continued to use CDBG funds for owner occupied housing improvement loans and homebuyer assistance loans.
- Continued implementation of a voluntary rental registry and inspection program.
- Continued a Rental Housing Advisory Board whose purpose is to advise staff on the creation of rental housing educational materials and residential rental training programs for landlords and tenants, to review and make recommendations regarding City policy or changes to the Municipal Code pertaining to rental housing.
- Annually the City's Transportation Department reviews the public transportation service areas and recommends updates/changes.
- The City advertises its housing rehabilitation program via several media outlets. Flyers are also mailed to homeowners in monthly City utility bills. Housing pamphlets are available at the main service counters at City Hall, the Seniors Center and the public library.

The City contracts with the Fair Housing Center of Northeast Wisconsin, a satellite office of the Metropolitan Milwaukee Fair Housing Council a private, non-profit organization, to provide comprehensive fair housing enforcement, outreach and education and technical assistance services to Oshkosh residents. During the 2020 program year, 8 housing complaints were investigated, the Council provided referrals to 1 person with non-fair housing issues, and provided 5 instances of technical assistance to residents, housing providers and social service agencies in the community. Due to the COVID pandemic, the Fair Housing Council mailed fair housing informational materials to Oshkosh housing providers and other interested organizations in lieu of a fair housing seminar. The mailing contained a link to HUD's Statement on Fair Housing and COVID-19. The Fair Housing Council also held a virtual presentation to the Oshkosh Rental Housing Advisory Board.

## **CR-40 - Monitoring 91.220 and 91.230**

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

The Community Development Department monitors its CDBG program to ensure compliance with HUD regulations and attainment of Consolidated Plan goals. Annual Action Plan activities are setup and tracked in IDIS to allow ongoing review of activities and expenditures.

**Procurement & Awards:** The City of Oshkosh encourages participation of disadvantaged business enterprises, women owned business enterprises and minority business enterprises in the City's procurement process. The City awards contracts to the lowest responsive, responsible bidder possessing the ability to perform successfully under the terms and conditions of the proposed procurement.

**Contract Management:** If applicable, bid packages and contractor meetings include documentation and discussion of Federal Labor Standards Provisions, Davis Bacon wage rate requirements, Section 3 and current Department of Labor Wage Rate Determinations. City staff inspects the work being invoiced prior to processing the invoice for payment. Contractors performing work subject to Davis Bacon are required to submit certified weekly payrolls, which are verified for compliance on a weekly basis. The Grants Coordinator also performs periodic unannounced employee interviews to further ensure compliance with applicable Federal requirements.

**Subrecipient Monitoring:** The City works closely with all subrecipients in order to ensure the goals and objectives of federally funded programs are adhered to and national objectives are being met. Subrecipients enter into agreements with the City to ensure all Federal, State and local regulations and criteria are being adhered to and met. Quarterly reporting from subrecipients allows the City to monitor progress each is making toward its year end goals. On-site monitoring is conducted as staff time permits to further ensure that overall goals and objectives are being met. Determining factors were the subrecipient's prior experience managing federal funds, the City's prior experience with the subrecipient, timeliness of expenditures and reporting, etc. Telephone calls and email communications were used to stay abreast of activities and changes, if any, to programs.

**Housing Monitoring:** Housing rehabilitation activities are monitored through the coordinated efforts of the Housing Rehab Specialist and Grants Coordinator, as well as the City's building inspectors. This allows for multiple levels of oversight of various federally funded activities to ensure compliance with local, state and federal requirements. City staff inspects the work being invoiced prior to processing the



invoice for payment. The home owner is also required to approve the payment being requested.

### **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.**

As outlined in both the Five Year Consolidated Plan and the 2020 Action Plan, the City of Oshkosh follows a public participation plan designed to solicit citizen input, while at the same time helping to inform the public of resources, emerging needs and restrictions and limitations of available resources.

The notice of availability of the Consolidated Annual Performance and Evaluation Report (CAPER) for the 2020 Community Development Block Grant Program Year was published on July 10, 2021. The notice included a provision that the Report includes an assessment of expenditures in relation to community objectives; progress on HUD financed activities; and an analysis of persons benefitting from activities. Also it was noted the Plan was available for public review online and in the Community Development office. The notice provided citizens an opportunity to attend the Redevelopment Authority meeting on July 21 at which time staff presented the 2020 CAPER summarizing the expenditures occurring during the program year and persons benefitting from the activities/programs carried out. The Redevelopment Authority meeting is televised on the local city cable channel. Staff noted at the Redevelopment Authority meeting that written comments were being accepted until July 26. Please see the Board comments and staff's response, in the excerpt from the July 21 Board meeting in the Attachments. No citizens comments were received at the Board meeting. A neighborhood meeting was also held the evening of July 22; X person attended but no comments were received. No written comments were received prior to submitting the CAPER to HUD.

## **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.**

The City of Oshkosh has not changed the objectives in its CDBG program and continues to strategically use CDBG funds to maximize leverage for affordable housing and homeownership, public services, central city and neighborhood revitalization, planning and administrative activities. The City continuously assesses and reviews its policies, procedures and programs in order to improve on the effective and efficient delivery of its grant programs. There is continued need for CDBG funds to fulfill objectives in all categories noted above, hence no changes are recommended based on Oshkosh's experiences.

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

No

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

**CR-50 - HOME 91.520(d)**

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

Please list those projects that should have been inspected on-site this program year based upon the schedule in §92.504(d). Indicate which of these were inspected and a summary of issues that were detected during the inspection. For those that were not inspected, please indicate the reason and how you will remedy the situation.

The City of Oshkosh does not receive HOME funds.

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

The City of Oshkosh does not receive HOME funds.

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

The City of Oshkosh does not receive HOME funds.

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

The City of Oshkosh does not receive HOME funds.