

# Executive Summary

## AP-05 Executive Summary - 24 CFR 91.200(c), 91.220(b)

### 1. Introduction

The Fiscal Year 2021 Annual Action Plan represents the second year of the City's Consolidated Plan (Con Plan) for Fiscal Years 2020-2024 as approved by the Oshkosh Common Council and the US Department of Housing and Urban Development (HUD). The Action Plan is the City of Oshkosh's application for HUD entitlement grant funds and identifies the proposed programs and projects to be funded during the City's CDBG Fiscal Year (FY) 2021.

During the 2021 Program Year, the City of Oshkosh will pursue the implementation of projects and activities in the categories: 1) Central City Redevelopment; 2) Housing; 3) Public Services; 4) Neighborhood Initiatives; 5) Public facility improvements and 6) Program Administration & Planning. Of the \$840,760 in estimated 2021 CDBG entitlement funds plus 2020 Program Income, a minimum of 70% of funds must be spent on activities that will benefit LMI persons.

Activities funded with CDBG funds in this Action Plan will meet the national objectives of benefiting LMI persons and/or preventing or eliminating slum or blighting conditions.

It is important to note that the Con Plan sets goals and strategies to be achieved over the FY 2020-2024 period. The six Con Plan Goals represent high priority needs for the City and serve as the basis for FY 2021 programs and activities identified in the Action Plan. The Con Plan goals are listed below in no particular order:

- Provide safe, decent, affordable housing
- Provide housing, services and facilities for homeless persons or those at-risk of becoming homeless
- Provide housing, services and facilities for persons with special needs
- Improve community facilities, infrastructure, public services and quality of life for residents
- Create suitable living environment through public facilities or infrastructure improvements

Encourage employment and promote economic opportunities

### 2. Summarize the objectives and outcomes identified in the Plan

This could be a restatement of items or a table listed elsewhere in the plan or a reference to another location. It may also contain any essential items from the housing and homeless needs assessment, the housing market analysis or the strategic plan.

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For details regarding the objectives and outcomes targeted in the Con Plan and this Annual Plan in relation to each of the six goals listed above, please refer to Sections AP-15 (Annual Goals and Objectives) and AP-35 (Projects).

### **3. Evaluation of past performance**

This is an evaluation of past performance that helped lead the grantee to choose its goals or projects.

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The City continues to monitor and evaluate the performance of the City's CDBG programs and activities while ensuring regulatory compliance. The City's Annual Action Plan and Consolidated Annual Performance and Evaluation Reports (CAPERs) have provided details about the innovations, projects and programs completed by the City over the past.

The City recognizes that the evaluation of past performance is critical to ensuring the City and its subrecipients are implementing activities effectively and that those activities align with the City's overall strategies and goals. The performance of programs and systems are evaluated on a regular basis. The City continues to improve the CDBG subrecipient application process in order to ease the administrative burden on applicants and volunteer community-member boards and reviewers.

### **4. Summary of Citizen Participation Process and consultation process**

Summary from citizen participation section of plan.

Summary from citizen participation section of plan.

In accordance with the *Citizen Participation Plan* outlined in the Con Plan, the draft Action Plan was available online and a copy was available for review at the Community Development Office at the Oshkosh City Hall. Hard copies of the Action Plan are available upon request.

The FY 2021 Action Plan was presented and discussed at the following virtual meetings:

- Plan Commission, April 6, 4:00 pm
- Neighborhood meeting – April 7, 5 pm
- Common Council, April 13, 6:00 pm
- Common Council, May 25, 6:00 pm

Over the past several months, City staff also consulted with representatives from area agencies participating in the Winnebagoland Housing Coalition, as well as the Oshkosh/Winnebago County Housing Authority and Advocap. These agencies provide a wide spectrum of services in the community and represent needs of many different segments of the population to ensure future CDBG programming meets the needs of the community.

#### **5. Summary of public comments**

This could be a brief narrative summary or reference an attached document from the Citizen Participation section of the Con Plan.

#### **6. Summary of comments or views not accepted and the reasons for not accepting them**

All public comments were accepted.

#### **7. Summary**

The City of Oshkosh's FY 2021 Annual Action Plan has been prepared as a guide for the expenditure of CDBG funds based upon input from citizens and local agencies regarding the needs of the community and use of funds; an assessment of needs in the community related to housing and community development and an analysis of the area's market create a picture of the environment in which the program will be administered.

**PR-05 Lead & Responsible Agencies – 91.200(b)**

**1. Agency/entity responsible for preparing/administering the Consolidated Plan**

Describe the agency/entity responsible for preparing the Consolidated Plan and those responsible for administration of each grant program and funding source.

Agency Role	Name	Department/Agency
Lead Agency	OSHKOSH	
CDBG Administrator	OSHKOSH	Community Development Department
HOME Administrator		

**Table 1 – Responsible Agencies**

**Narrative (optional)**

The City of Oshkosh has designated its Community Development Department as the lead agency responsible for administration of the Community Development Block Grant (CDBG) program and associated reports. The Department is also the major public agency responsible for administering programs addressed in the Consolidated Plan and this FY 2021 Annual Action Plan, except for Homeless Programs. The Continuum of Care (CoC) for Homeless Programming is the Winnebagoland Housing Coalition with ADVOCAP as the local non-profit agency taking the leadership role in administration.

The City works with numerous community-based organizations, partners, businesses, other funders, as well as City of Oshkosh departments, to plan, develop, implement and evaluate activities outlined in this plan.

**Consolidated Plan Public Contact Information**

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## **AP-10 Consultation – 91.100, 91.200(b), 91.215(I)**

### **1. Introduction**

Consultation on development of this Plan was achieved through interviews and public hearings. Efforts were made to consult agencies that provide a wide range of services so that a clear picture of community needs would be available during development of the Plan. The City of Oshkosh consulted with public and private agencies and organizations that provide assisted housing, health services, and social services (including those focusing on services to children, elderly persons, persons with disabilities, persons with HIV/AIDS and their families, homeless persons), community-based and regionally-based organizations that represent protected class members, and organizations that enforce fair housing laws.

### **Provide a concise summary of the jurisdiction's activities to enhance coordination between public and assisted housing providers and private and governmental health, mental health and service agencies (91.215(I))**

The City's Community Development Department acts as the single point of contact to coordinate efforts between public and assisted housing providers, as well as private and governmental health, mental health, and social service agencies. The City works with the following agencies to enhance funding and service allocations to address the housing and community development needs of the area:

- City of Oshkosh Community Development Department - oversees the CDBG program
- Winnebago County Department of Human Services - provides care and protection to County residents from infancy to old age, through consumer-focused programs designed to maintain and improve the quality of life for consumers and their families
- Oshkosh/Winnebago County Housing Authority - manage the Public Housing and Section 8 Housing Choice Voucher Programs, create improvements to public housing communities, and develop affordable housing
- Social Services Agencies - provides services to address the needs of low- and moderate-income persons and those with special needs
- Housing Providers - rehabilitates and develops affordable housing for low- and moderate-income families and individuals
- Winnebagoland Housing Coalition / CoC - oversees the Continuum of Care Network for the City of Oshkosh and Winnebago County.

Each year as part of the application planning process, local jurisdictions, agencies, and organizations are invited to submit proposals for CDBG funds for eligible activities. These groups participate in the planning process by attending the public hearings, informational meetings, and through electronic updates. These groups are notified through the City's Community Development Department network of upcoming meetings and funding opportunities. Also, the staff of the Community Development

Department have proactively been participating in additional community encounter opportunities and forming partnerships to accomplish larger scale housing and community development activities.

**Describe coordination with the Continuum of Care and efforts to address the needs of homeless persons (particularly chronically homeless individuals and families, families with children, veterans, and unaccompanied youth) and persons at risk of homelessness.**

The City of Oshkosh is a member of the WinnebagoLand Housing Coalition, under the Wisconsin Balance of State Continuum of Care (WIBOSCOG). WinnebagoLand Housing Coalition meets each month to engage in conversations regarding homeless issues, as well as coordinating the efforts of a variety of agencies serving youth, families, and veterans experiencing homelessness. City of Oshkosh staff attends the local CoC meetings and acts as the City's representative. The City coordinates its activities with the Continuum of Care and supports its applications for funds. The City helps WIBOSCOG to address homelessness by working together to develop a framework to deliver housing and supportive services to the homeless and those at risk of homelessness.

The WinnebagoLand Housing Coalition identifies regional and local homeless issues; coordinates regional planning; identifies regional housing gaps and needs, strategies, and priorities; provides input for Supportive Services for Veteran Families (SVF) and Emergency Solutions Grants (ESG) applications; participates in completion of the CoC application; monitors Homeless Management Information Systems (HMIS) participation and implementation; and coordinates and follows-up on the Point in Time (PIT) count and Annual Homeless Assessment Report (AHAR).

The WinnebagoLand Housing Coalition has representation from multiple interest groups including: CDBG Jurisdictions, Public Housing Authorities, domestic violence service providers, Veterans, youth service providers, Community Action Partnerships, homeless service providers, and faith-based organizations.

**Describe consultation with the Continuum(s) of Care that serves the jurisdiction's area in determining how to allocate ESG funds, develop performance standards for and evaluate outcomes of projects and activities assisted by ESG funds, and develop funding, policies and procedures for the operation and administration of HMIS**

Most of WIBOSCOG ESG funding is allocated by the Wisconsin Department of Administration, Division of Housing, Energy, and Community Resources (DEHCR). The CoC develops priorities, target populations, outcome measures, and evaluation processes for ESG through an elected agency such as ADVCOAP, including prioritizing Rapid ReHousing (RRH). The CoC decides on ESG funding ranking and project scoring based on knowledge of projects, capacity of applicants and participation in CoC planning. ADVCOAP, as the Collaborative Applicant and HMIS Lead, has access to the Point in Time and Homeless Management Information System (HMIS) data.

The Winnebagoland CoC and the HMIS work together to assess data quality throughout the CoC. This includes working on Annual Homeless Assessment Report (AHAR) submission, the PIT count, project review/ranking, and working with individual programs while completing their Annual Performance Reports (APRs). In total, there are 176 projects listed on the CoC's Housing Inventory Chart. There are thirty-seven (37) beds at the Christine Ann Domestic Violence Shelter, thirty-four (34) beds at Father Carr's Men's Shelter, and 105 beds at Father Carr's Women & Family Shelter. However, it is important to note that while Father Carr's shelters show a significant number of beds available, the occupancy rate is only between 25% - 40%. No new beds have been added to the CoC over the past several years. Lastly, the Day-by-Day Warming Shelter has twenty-five (25) beds during the winter months, open only from October 15th through April 15th.

There are two (2) transitional housing projects within Winnebago County that are operated by ADVOCAP. One project consists of two (2) agency-owned homes that can house a total of 10 people, while the other is a scattered-site transitional housing project funded by the Department of Justice. The DOJ-funded project can provide for three (3) individuals and ten (10) families per year. ADVOCAP also operates a HUD-funded permanent supportive housing project, with five (5) households within Oshkosh in scattered sites, and four (4) HUD-funded Rapid Re-Housing projects, with seventeen (17) households in Oshkosh. However, there are zero Runaway or Homeless Youth beds being reported in Oshkosh or Winnebago County. Additional outreach to volunteer and faith-based organizations will occur through the implementation of coordinated entry. Increased engagement and education among these groups should lead to increased HMIS participation. The CoC will work with Veterans to improve participation among VA-funded projects.

**2. Describe Agencies, groups, organizations and others who participated in the process and describe the jurisdiction's consultations with housing, social service agencies and other entities**

**Table 2 – Agencies, groups, organizations who participated**

1	<b>Agency/Group/Organization</b>	Oshkosh/Winnebago County Housing Authority
	<b>Agency/Group/Organization Type</b>	PHA
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Public Housing Needs Non-Homeless Special Needs
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	discussed public housing needs in the community as well as the needs of the City's low to moderate income residents, and how the city and housing authority could work together collaboratively
2	<b>Agency/Group/Organization</b>	Winnebagoland Housing Coalition
	<b>Agency/Group/Organization Type</b>	Continuum of Care
	<b>What section of the Plan was addressed by Consultation?</b>	Public Housing Needs Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy Public Service Agencies
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	The Coalition was consulted for affordable housing and public housing needs in the community. City staff attends monthly Coalition meetings to keep informed on services available and needs of the community
3	<b>Agency/Group/Organization</b>	City of Oshkosh Economic Development
	<b>Agency/Group/Organization Type</b>	Other government - Local
	<b>What section of the Plan was addressed by Consultation?</b>	Economic Development

	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	economic development strategies and initiatives that are currently in place or may be undertaken
4	<b>Agency/Group/Organization</b>	Greater Oshkosh Economic Development Corporation
	<b>Agency/Group/Organization Type</b>	Business Leaders Non profit economic development group
	<b>What section of the Plan was addressed by Consultation?</b>	Economic Development
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	A non-profit corporation that works with the community to provide leadership, direction, coordination, and services to advance economic development in the greater Oshkosh area
5	<b>Agency/Group/Organization</b>	Winnebago County Health Department
	<b>Agency/Group/Organization Type</b>	Services-Persons with Disabilities Services-Persons with HIV/AIDS Services-Health Other government - County
	<b>What section of the Plan was addressed by Consultation?</b>	Non-Homeless Special Needs Lead-based Paint Strategy
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Lead based paint policies and health and safety needs of Oshkosh residents

6	<b>Agency/Group/Organization</b>	ADVOCAP INC.
	<b>Agency/Group/Organization Type</b>	Services - Housing Services-Elderly Persons Services-Persons with Disabilities Services-homeless Services-Education Services-Employment Civic Leaders
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy Non-Homeless Special Needs HOPWA Strategy Economic Development Anti-poverty Strategy
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Consultation regarding affordable housing needs; collaborate on various programs/activities to best serve the community
7	<b>Agency/Group/Organization</b>	City of Oshkosh Public Works Department
	<b>Agency/Group/Organization Type</b>	Other government - Local
	<b>What section of the Plan was addressed by Consultation?</b>	Economic Development Public facilities / infrastructure

	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	discussion regarding various infrastructure improvements planned during the program year
8	<b>Agency/Group/Organization</b>	Neighborhood Associations
	<b>Agency/Group/Organization Type</b>	Neighborhood Associations Neighborhood Organization
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Neighborhood Initiatives
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	discuss neighborhood programs/activities to create strong and healthy neighborhoods
9	<b>Agency/Group/Organization</b>	Day by Day Warming Shelter
	<b>Agency/Group/Organization Type</b>	Services-homeless Services-Health Services-Employment
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy Non-Homeless Special Needs
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	provide shelter and advocacy

10	<b>Agency/Group/Organization</b>	Greater Oshkosh Healthy Neighborhoods
	<b>Agency/Group/Organization Type</b>	Non-profit
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Non-Homeless Special Needs Neighborhood Initiatives
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	expand on the organization's role in developing, expanding and organizing neighborhood planning projects/programs/activities, acquiring slum and blight properties
11	<b>Agency/Group/Organization</b>	HABITAT FOR HUMANITY OF OSHKOSH INC.
	<b>Agency/Group/Organization Type</b>	Non-profit
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Strategy Non-Homeless Special Needs
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Habitat's continued role in construction of new affordable housing for LMI households. Continue partnership projects with City and local PHA
12	<b>Agency/Group/Organization</b>	Metropolitan Milwaukee Fair Housing Council
	<b>Agency/Group/Organization Type</b>	Service-Fair Housing
	<b>What section of the Plan was addressed by Consultation?</b>	Fair Housing
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	continue to contract with satellite office in Appleton to provide training opportunities for landlords and tenants, as well as investigate potential fair housing complaints in the community

13	<b>Agency/Group/Organization</b>	Oshkosh Public Service Consortium
	<b>Agency/Group/Organization Type</b>	Business and Civic Leaders
	<b>What section of the Plan was addressed by Consultation?</b>	Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Strategy Non-Homeless Special Needs Public Service Agencies
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	collaboration effort between City, local community foundation and United Way to allocate funds to public service agencies

**Identify any Agency Types not consulted and provide rationale for not consulting**

All stakeholders were notified of the notice of public hearings and comment period.

**Other local/regional/state/federal planning efforts considered when preparing the Plan**

<b>Name of Plan</b>	<b>Lead Organization</b>	<b>How do the goals of your Strategic Plan overlap with the goals of each plan?</b>
Continuum of Care	Winnebagoland Housing Coalition	Alleviate the impact of homelessness in the community through cooperation and collaboration of social service providers
Oshkosh 2005-2025 Comprehensive Plan; Update 2040	City of Oshkosh	City's general plan is comprised of various elements that provide a comprehensive slate of city-wide policies and furthers the City's smart growth strategy for growth and development.
City of Oshkosh Comp Plan - Housing	City of Oshkosh	Housing Element serves as a policy guide to help the city meet its existing and future housing needs. The Plan has the goal of creating and preserving affordable housing stock within the city.

Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
Oshkosh Analysis of Impediments	City of Oshkosh	Analysis of Impediments to Fair Housing Choice presents a demographic profile of the city, assesses the extent of housing needs among specific income groups and evaluates the availability of a range of housing choices for residents
Oshkosh Housing Authority 5 Year Plan	Oshkosh/Winnebago Housing Authority	The goals of the City and Housing Authority are complementary.
Oshkosh Strategic Plan	City of Oshkosh	The goals are complementary.

**Table 3 – Other local / regional / federal planning efforts**

**Narrative (optional)**

None

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## **AP-12 Participation – 91.105, 91.200(c)**

### **1. Summary of citizen participation process/Efforts made to broaden citizen participation Summarize citizen participation process and how it impacted goal-setting**

City staff continues to work with the Oshkosh Public Service Consortium and community groups, organizations and agencies to increase citizen participation and improve the FY 2021 CDBG application and evaluation process. The City also seeks input from the Plan Commission to ensure projects and activities to be carried out are in compliance with the City's adopted Comprehensive Plan. The Plan Commission serves in an advisory capacity to the Common Council on issues related to the Consolidated Plan, Annual Action Plan, end of the year CAPER reporting, Analysis of Impediments to Fair Housing, as well as the CDBG allocation.

All meetings are open to the public and agendas are distributed via email, internet posting and hardcopy posting. Meeting notes summarizing the discussion items and actions taken are posted online and made available at subsequent meetings to keep interested parties informed. Due to the pandemic situation, all public meetings are held virtually. Citizens are provided the necessary link information to participate in the public meeting.

City staff, along with partner agencies such as Oshkosh/Winnebago County Housing Authority and Winnebagoland Housing Coalition, receive feedback from the public and other community stakeholders regarding the implementation of HUD funded programs through presentations and attendance at monthly meetings.

**Citizen Participation Outreach**

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Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (if applicable)
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1	Public Meeting	Non-targeted/ broad community	The Plan Commission met on April 6, 2021 to obtain comments on the 2021 Annual Action Plan. Meetings were held virtually; no citizens signed up to speak or were present. 9 Board members present	A comment was received at the April 6 Plan Commission meeting relative to increasing affordable housing options for new housing developments. It was noted that CDBG funds cannot be used for new construction activities and was not an	All comments were accepted.	
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Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (if applicable)
				activity proposed with CDBG funding. No other comments were received.		
2	Public Meeting	Non-targeted/broad community	Public hearing held before Common Council on April 13, 2021 Seven Council members present;	No public comments received	N/A	
3	Winnebagoland Housing Coalition	Non-targeted; email distribution of availability of draft Action Plan for comments	Email distribution list of 30+ members	No comments were received	N/A	

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (if applicable)
4	Public Meeting	Non-targeted/ broad community	There were no attendees at the April 7, 2021 neighborhood public hearing on the 2021 Annual Action Plan.	No comments were received.	N/A	
5	Public Hearing	Non-targeted/ broad community	Public hearing held before Common Council on May 25, 2021 Eight Council members present;	No comments were received	N/A	
6	Public Meeting	Non-targeted/ broad community	Notice of public service applications being accepted distributed via email to 50+ public service agencies; notice posted on City's website; public press release issued	22 applications were received. Applications reviewed by the Public Service Committee. 13 applications were funded.	N/A	

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (if applicable)
7	Public Meeting	Non-targeted/ broad community	A public hearing notice detailing the public hearing schedule was published in the Oshkosh Northwestern	No comments received	N/A	

**Table 4 – Citizen Participation Outreach**

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## Expected Resources

### AP-15 Expected Resources – 91.220(c)(1,2)

#### Introduction

The City of Oshkosh will receive \$840,760 in CDBG funds for FY 2021 Program Year. The City does not expect to receive any Program Income during the FY 2021 Annual Action Plan period. The City's FY 2021 CDBG program year starts on May 1, 2021 and concludes on April 30, 2022.

The following financial resources are identified for the FY 2021 Annual Action Plan and will be used to address the following needs: Housing Needs; Homeless Needs; Other Special Needs; Community Development; Economic Development Needs; Neighborhood Initiatives; and Administration, Planning, and Management Needs. The accomplishments of these projects/activities will be reported in the FY 2021

**Anticipated Resources**

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
CDBG	public - federal	Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services	840,760	0	0	840,760	2,171,450	The City does not anticipate receiving any program income. However, any program income generated will be placed in a revolving loan fund and used exclusively for projects/programs eligible under housing/neighborhood projects
Other	public - federal	Admin and Planning Economic Development Public Services Other	0	0	0	0	0	

Table 5 - Expected Resources – Priority Table

**Explain how federal funds will leverage those additional resources (private, state and local funds), including a description of how matching requirements will be satisfied**

While the CDBG program does not require leveraging, the program does leverage other resources. The City budgets funds in its Capital

Improvement Program for additional programs for housing related activities (i.e. acquisition, housing rehabilitation), public facility improvements, landscaping, curb appeal projects, and acquisition of properties to eliminate slum and blight.

The Oshkosh Area Community Foundation and the Oshkosh United Way partner with the City of Oshkosh in forming the Oshkosh Public Service Consortium. The Consortium seeks applications from public service agencies for programs/activities that meet one of HUD's national objectives and provides a direct benefit to low- to moderate-income households.

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**If appropriate, describe publically owned land or property located within the jurisdiction that may be used to address the needs identified in the plan**

The City of Oshkosh may provide vacant/undeveloped lots to private developers, Habitat for Humanity, Advocap or other non-profit/CHDO agencies for construction of new affordable housing units.

**Discussion**

The CDBG program year runs from May 1, 2021 through April 30, 2022. The CDBG funds will be used to address the following priority needs:

- Housing Needs
- Homeless Needs
- Other Special Needs
- Community Development Needs
- Economic Development Needs
- Administration, Planning, and Management Needs

## Annual Goals and Objectives

### AP-20 Annual Goals and Objectives

#### Goals Summary Information

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	HS-3 Housing Rehabilitation	2020	2024	Affordable Housing	Oshkosh Priority Areas	Housing Need	CDBG: \$366,550	Homeowner Housing Rehabilitated: 39 Household Housing Unit
2	HS-1 Housing Support	2020	2024	Affordable Housing Public Housing	Oshkosh Priority Areas	Housing Need	CDBG: \$40,000	Direct Financial Assistance to Homebuyers: 4 Households Assisted
3	CD-3 Public Services	2020	2024	Non-Housing Community Development	Oshkosh Priority Areas	Community Development Need	CDBG: \$120,000	Public service activities other than Low/Moderate Income Housing Benefit: 1000 Persons Assisted
4	CD-1 Community Facilities and Infrastructure	2020	2024	Non-Housing Community Development	Oshkosh Priority Areas Center City	Community Development Need	CDBG: \$150,000	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 1000 Persons Assisted
5	AM-1 Overall Coordination	2020	2024	Administration, Planning, and Management	Oshkosh Priority Areas	Administration, Planning, and Management Need	CDBG: \$93,000	Other: 2 Other

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
6	CD-5 Clearance/Demolition	2020	2024	Non-Housing Community Development	Oshkosh Priority Areas	Community Development Need	CDBG: \$71,210	Buildings Demolished: 1 Buildings

Table 6 – Goals Summary

### Goal Descriptions

1	<b>Goal Name</b>	HS-3 Housing Rehabilitation
	<b>Goal Description</b>	Conserve and rehabilitate existing affordable housing units occupied by owners and renters by addressing code violations, emergency repairs and handicap accessibility.
2	<b>Goal Name</b>	HS-1 Housing Support
	<b>Goal Description</b>	Assist low- and moderate-income households to access decent, safe and sanitary housing that is affordable and accessible for rent or for sale through housing counseling, down payment/closing cost assistance.
3	<b>Goal Name</b>	CD-3 Public Services
	<b>Goal Description</b>	Improve and enhance the public and community development services in the City.
4	<b>Goal Name</b>	CD-1 Community Facilities and Infrastructure
	<b>Goal Description</b>	Improve the City's public facilities and infrastructure through rehabilitation, reconstruction, and new construction or acquisition of property for public facility.

5	<b>Goal Name</b>	AM-1 Overall Coordination
	<b>Goal Description</b>	Provide program management and oversight for the successful administration of federal, state, and local funded programs, including planning services for special studies, environmental clearance, fair housing activities, and compliance with all federal, state, and local laws and regulations.
6	<b>Goal Name</b>	CD-5 Clearance/Demolition
	<b>Goal Description</b>	Remove and eliminate slum and blighting conditions in the City.

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# Projects

## AP-35 Projects – 91.220(d)

### Introduction

During the 2021 Program Year, the City of Oshkosh will pursue the implementation of projects and activities in seven major categories:

- Program Administration & Planning
- Fair Housing
- Housing Rehabilitation
- Neighborhood Initiatives
- Central City Redevelopment
- Public Services
- Public Facility

The use of CDBG funds in 2021 will focus on activities and programs that:

- Improve and maintain housing and create accessibility to homeownership for income qualified homebuyers
- Revitalize neighborhoods through streetscaping improvements, curb appeal improvements, elimination of slum and blight properties
- Provide funding to various public service agencies, to be determined, that provide shelter/services to persons that are homeless, affected by domestic abuse, recovering from addiction, need health care services, etc.
- Provide training for landlords or tenants on fair housing regulations
- Provide administration of the overall CDBG program

### Projects

#	Project Name
1	Program Administration
2	Fair Housing

#	Project Name
3	Housing Rehabilitation
6	Neighborhood Initiatives
7	Central City Redevelopment
8	Public Services
9	Public Facility

**Table 7 - Project Information**

**Describe the reasons for allocation priorities and any obstacles to addressing underserved needs**

DRAFT

**AP-38 Project Summary**  
**Project Summary Information**

DRAFT

<b>1</b>	<b>Project Name</b>	Program Administration
	<b>Target Area</b>	
	<b>Goals Supported</b>	HS-1 Housing Support HS-3 Housing Rehabilitation CD-3 Public Services AM-1 Overall Coordination
	<b>Needs Addressed</b>	Housing Need Homeless Need Other Special Needs
	<b>Funding</b>	CDBG: \$74,000
	<b>Description</b>	Funds used for salaries of personnel involved in general management, oversight and coordination of CDBG program, associated training and related costs; as well as, preparation of functional plans and studies.
	<b>Target Date</b>	4/30/2022
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	66,580 persons (ACS 2011-2015 City Population)
	<b>Location Description</b>	City of Oshkosh, Department of Community Development, 215 Church Avenue, Oshkosh, WI 54903-1130
	<b>Planned Activities</b>	Matrix Code: 21A General Program Administration 570.206
<b>2</b>	<b>Project Name</b>	Fair Housing
	<b>Target Area</b>	Oshkosh Priority Areas
	<b>Goals Supported</b>	HS-1 Housing Support HS-3 Housing Rehabilitation CD-3 Public Services AM-1 Overall Coordination
	<b>Needs Addressed</b>	Housing Need Homeless Need Other Special Needs
	<b>Funding</b>	CDBG: \$19,000

	<b>Description</b>	Provide fair housing counseling and training activities to protected populations who are prospective renters and/or landlords and property owners, as well as provide fair housing services (i.e. intake, referrals, etc.) for residents of Oshkosh. Process complaint/intake services; referral services with non-fair housing inquiries, as well as provide fair housing training sessions for local landlords, tenants, homeowners, and interested parties.
	<b>Target Date</b>	4/30/2022
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	66,580 persons (ACS 2011-2015 City Population)
	<b>Location Description</b>	Citywide
	<b>Planned Activities</b>	Matrix Code: 21D Fair Housing Activities (subject to Admin cap) 24 CFR 570.206(c)
<b>3</b>	<b>Project Name</b>	Housing Rehabilitation
	<b>Target Area</b>	
	<b>Goals Supported</b>	HS-1 Housing Support HS-3 Housing Rehabilitation CD-3 Public Services AM-1 Overall Coordination
	<b>Needs Addressed</b>	Housing Need Homeless Need Other Special Needs
	<b>Funding</b>	CDBG: \$350,550
	<b>Description</b>	Funds used to rehab and expand the City's affordable housing stock for LMI households as well as to stabilize and visually improve older LMI neighborhoods. Funds will be used to provide home ownership opportunities to eligible homebuyers by providing direct downpayment assistance loans. Funds will be used to acquire homes in need of repair, make needed repairs and sell the home to a qualified homebuyer. Improve and maintain affordable housing for LMI persons/households; home ownership assistance, rental rehabilitation, acquisition, rehab and resale to eligible homebuyers.
	<b>Target Date</b>	4/30/2022

	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	12 LMI Households
	<b>Location Description</b>	Citywide
	<b>Planned Activities</b>	Matrix Codes: 13B Homeownership Assistance (excluding Housing Counseling under 24 CFR 5.100) 24 CFR 570.201(n) AND 14A Rehabilitation: Single-Unit Residential 24 CFR 570.202(a)(1) National Objective: LMH Low/mod housing benefit: activities that are carried out for the purpose of providing or improving permanent residential structures that will be occupied by low/mod income households. 570.208(a)(3)
<b>4</b>	<b>Project Name</b>	Neighborhood Initiatives
	<b>Target Area</b>	Oshkosh Priority Areas
	<b>Goals Supported</b>	HS-1 Housing Support HS-3 Housing Rehabilitation
	<b>Needs Addressed</b>	Housing Need Homeless Need Other Special Needs
	<b>Funding</b>	CDBG: \$56,000
	<b>Description</b>	Funding to assist in rehabilitation of homes occupied by residents in low-moderate income areas.
	<b>Target Date</b>	4/30/2022
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	10 LMI Households
	<b>Location Description</b>	Citywide
	<b>Planned Activities</b>	Matrix Code: 14A Rehabilitation: Single-Unit Residential 24 CFR 570.202(a)(1) National Objective: LMA Low/mod Area Benefit: activities that are carried out for the purpose of providing or improving permanent residential structures that will be occupied by low/mod income households. 570.208(a)(1)

5	<b>Project Name</b>	Central City Redevelopment
	<b>Target Area</b>	Oshkosh Priority Areas
	<b>Goals Supported</b>	HS-3 Housing Rehabilitation CD-5 Clearance/Demolition
	<b>Needs Addressed</b>	Housing Need Community Development Need
	<b>Funding</b>	CDBG: \$71,210
	<b>Description</b>	Assist with redevelopment of blighted properties within the central city, acquisition of scattered spot blighted properties, properties within designated redevelopment areas, or approved neighborhood associations. Activities may include acquisition, relocation, demolition, environmental remediation, public facility improvements, streetscaping and site clearance.
	<b>Target Date</b>	4/30/2022
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	66,580 persons (ACS 2011-2015 City Population)
	<b>Location Description</b>	Central City
	<b>Planned Activities</b>	Matrix Code: 04 Clearance and Demolition 24 CFR 570.201(d) National Objective: SBS Slum/blight, spot basis - Activities undertaken on a spot basis to address conditions of blight or physical decay not located in designated slum/blight areas. 570.208(b)(2)
6	<b>Project Name</b>	Public Services
	<b>Target Area</b>	
	<b>Goals Supported</b>	HS-3 Housing Rehabilitation CD-3 Public Services AM-1 Overall Coordination
	<b>Needs Addressed</b>	Housing Need Homeless Need Other Special Needs Community Development Need
	<b>Funding</b>	CDBG: \$120,000

	<b>Description</b>	Funds provided to local non-profit agencies that provide needed services to LMI individuals/households. An established Public Service Consortium, consisting of citizens at large, provides a streamlined application & evaluation process to reduce funding overlaps with limited dollars. The Public Service Consortium will allocate funds to public service agencies that may apply for funding through the City's application process. Activities may include health care assistance, emergency shelter, food pantry, peer support, advocacy and education, emergency assistance, dental care.
	<b>Target Date</b>	4/30/2022
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	1,000 LMI persons
	<b>Location Description</b>	Citywide
	<b>Planned Activities</b>	Matrix Code: 05Z Other Public Services Not Listed in 03T and 05A-05Y 24 CFR 570.201(e)  National Objective: LMC Low/mod limited clientele benefit - Activities that benefit a limited clientele, at least 51% of whom are low/mod income. LMC activities provide benefits to a specific group of persons rather than to all the residents of a particular area. 570.208(a)(2)
<b>7</b>	<b>Project Name</b>	Public Facility
	<b>Target Area</b>	Center City
	<b>Goals Supported</b>	CD-1 Community Facilities and Infrastructure
	<b>Needs Addressed</b>	Housing Need Homeless Need Other Special Needs Community Development Need
	<b>Funding</b>	CDBG: \$150,000
	<b>Description</b>	Funds to be used for the acquisition of a site for a public facility.
	<b>Target Date</b>	4/30/2022

<b>Estimate the number and type of families that will benefit from the proposed activities</b>	30 LMI individuals
<b>Location Description</b>	Central City
<b>Planned Activities</b>	Matrix Code: 01 Acquisition 24 CFR 570.201(c) National Objective: LMC Low/Mod Limited Clientele 570.208(a)(2)

## AP-50 Geographic Distribution – 91.220(f)

### Description of the geographic areas of the entitlement (including areas of low-income and minority concentration) where assistance will be directed

All programs, projects, and activities to be carried out under the 2021 Annual Action Plan will meet one of the three National objectives of:

- Benefit to low and moderate income (LMI) persons.
- Aid in the prevention or elimination of slums or blight.
- Meet a need having a particular urgency

Funds will be used to assist LMI persons and households on a city-wide basis or in neighborhoods with approved associations, occur in and benefit LMI/LMA census tracts/block groups, or in spot blighted or approved redevelopment areas. See Exhibit B for low to moderate income census block groups and Exhibit C for the City’s approved neighborhood association map. It should be noted the neighborhood associations map (Exhibit C) will change as new associations are recognized by the City.

### Geographic Distribution

Target Area	Percentage of Funds
Oshkosh Priority Areas	85
Center City	

Table 8 - Geographic Distribution

### Rationale for the priorities for allocating investments geographically

Assistance will be directed primarily to LMI census tracts and block groups and recognized neighborhood associations (as shown in the maps in Exhibit B and Exhibit C), as well as properties spot blighted or designated as redevelopment areas by the City, or on a community wide basis to LMI income eligible persons. The majority of the LMI census tracts and block groups are located within the oldest areas of the Central City, which are predominately single and two family residential neighborhoods (though many have experienced inappropriate single family to multiple family conversions), but also include a mix of commercial, industrial and institutional uses.

Residents in these areas have limited financial capacity to address housing and non-housing conditions, as well as neighborhood revitalization efforts. The City’s 2021 CDBG Action Plan activities and programs

are intended to address these needs.

## **Discussion**

## Affordable Housing

### AP-55 Affordable Housing – 91.220(g)

#### Introduction

City of Oshkosh will utilize its CDBG funds to support down-payment assistance, rental rehabilitation, and owner occupied housing rehabilitation programs.

The following affordable housing accomplishments are expected to be completed during the FY 2021 CDBG Program Year:

<b>One Year Goals for the Number of Households to be Supported</b>	
Homeless	0
Non-Homeless	15
Special-Needs	0
Total	15

**Table 9 - One Year Goals for Affordable Housing by Support Requirement**

<b>One Year Goals for the Number of Households Supported Through</b>	
Rental Assistance	0
The Production of New Units	0
Rehab of Existing Units	13
Acquisition of Existing Units	2
Total	15

**Table 10 - One Year Goals for Affordable Housing by Support Type**

#### Discussion

The City will fund the following affordable housing activities to achieve the stated one year goals above with FY 2021 CDBG funds:

- Housing Rehabilitation - 11 LMI owner-occupied housing units rehabbed and 2 LMI households provided downpayment assistance
- Code Violation - 2 LMI owner-occupied housing units rehabbed

## **AP-60 Public Housing – 91.220(h)**

### **Introduction**

The City of Oshkosh will provide funding to support the Oshkosh/Winnebago County Housing Authority and the local Habitat for Humanity's homebuyers programs with downpayment assistance loans and rehabilitation as needed for repairs/code violations.

The Oshkosh/Winnebago County Housing Authority currently owns eight public housing properties, in addition to a number of scattered sites:

1. Court Tower - 104 units, 100 Court Street, Oshkosh, WI 54901
2. Raulf Place - 104 units, 530 N Main Street, Oshkosh, WI 54901
3. Marian Manor - 121 units for elderly and disabled residents, 600 Merritt Avenue, Oshkosh, WI 54901
4. Fox View Apartments - 31 units for elderly residents, 330 West Main Street, Omro, WI 54963
5. Riverside Commons - 30 units, 101 North Second Street, Winneconne, WI 54986
6. Cumberland Court Apartments - 72 units, 1030 Cumberland Trail, Oshkosh, WI 54904
7. Waite Rug Apartments - 56 units for elderly, disabled, or veteran residents, 300 East Custer Avenue, Oshkosh, WI 54901
8. Willow Apartments - 13 units, 202 E Tennessee Ave, Oshkosh, WI, 54904

### **Actions planned during the next year to address the needs to public housing**

The City of Oshkosh will collaborate with the Oshkosh/Winnebago County Housing Authority on projects to further affordable housing for low- to moderate-income households and/or disabled households.

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

Residents of the Oshkosh Housing Authority have an annual meeting with the Executive Director, as well as bi-monthly meetings with property managers and social workers. Additionally, there is a tenant from Raulf Place on the Housing Authority Board. The Housing Authority also sends out newsletters to residents to keep them informed on Housing Authority activities and initiatives. In order to better serve non-English speaking public housing residents, the Housing Authority has translators available for residents. Additionally, the housing authority invites a guest speaker at an annual employee event, and sends out monthly Fair Housing online newsletters to all staff.

### **If the PHA is designated as troubled, describe the manner in which financial assistance will be provided or other assistance**

Not applicable; the Oshkosh Housing Authority and Winnebago County Housing Authority are not

designated as troubled.

## **Discussion**

The City of Oshkosh has identified that there is a need for decent, safe and sanitary housing that is affordable and accessible to address the households affected by housing problems, severe housing problems, and housing cost burdens. The largest groups affected by housing problems are the extremely low-income households and senior households. The Oshkosh/Winnebago County Housing Authority is an important part of the City's affordable housing strategy and the primary assisted housing provider of housing for extremely low income, very low income, and lower income residents of the City of Oshkosh.

## **AP-65 Homeless and Other Special Needs Activities – 91.220(i)**

### **Introduction**

The Wisconsin Balance of State CoC (WIBOSCOC) serves a total of sixty-nine counties. The 69 counties are organized into twenty-one geographically dispersed local homeless coalitions. The City of Oshkosh is part of the Winnebago CoC. The region is made up of two counties which include: Fond du Lac County and Winnebago County.

According to the WIBOSCOC governance charter, the purpose of the Wisconsin Balance of State CoC is to lead and support the efforts of its members to end homelessness. The CoC works toward ending homelessness by providing leadership to providers of homeless services and ensuring the efficient and effective delivery of housing and supportive services to individuals and families experiencing homelessness or at risk of homelessness. This includes strongly encouraging community-wide commitment to ending homelessness, providing funding for efforts by nonprofit providers, and promoting access to and effective use of mainstream programs by individuals and families experiencing homelessness.

The City continues to collaborate with the local warming shelter on how the City can assist in the Shelter's efforts to construct a more permanent shelter facility that will offer on-site services, additional resources and additional beds.

### **Describe the jurisdictions one-year goals and actions for reducing and ending homelessness including**

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

Homeless service providers maintain 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 to the homeless service providers.

Also, ADVOCAP and the Day by Day Warming Shelter provides staff support to conduct point in time surveys of homeless needs, prepare annual needs assessment and prioritization of unmet needs, and write grants for joint homeless activities. The City will continue to participate as a member of the Winnebago Housing Coalition to provide and obtain input from organizations providing the necessary services and assist with funding where possible.

The biggest risk factors of homelessness continued to be: 1) a person or family double-up with another family, 2) being released from a psychiatric facility, 3) being released from a substance abuse treatment

facility, or 4) being released from a correctional facility.

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

The City of Oshkosh will continue to support the Day by Day Warming shelter that serves a small but definite population of persons with limited shelter options in the community. The Day by Day Warming Shelter adds an important level to the continuum of care in this area by providing a safe setting to a vulnerable homeless population. Despite nearly 200 success stories of guests working toward self-sufficiency at the shelter, the need for temporary overnight shelter is growing in Oshkosh. The City will continue to support this public service activity in 2021.

Homelessness and the factors affecting it are increasing and the temporary local warming shelter has to regularly turn people in need away. The City will work with Day by Day Warming Shelter in its pursuit of a more permanent shelter facility that will offer on-site services and resources and additional beds.

Also, the Redevelopment Authority (RDA) of the City of Oshkosh has leased a single family house to Advocap for short term transitional housing.

### **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**

Using the HUD System Performance Measure Guidance, the HMIS Lead developed a CoC Performance Report with metrics for “Length of Time Homeless” (LOTH) and reviewed this data with the CoC Data Committee which meets quarterly to review CoC Performance and identify needed interventions. The strategies to reduce the length of time of homelessness include: 1) Coordinated Entry through the Vulnerability Index & Service Prioritization Decision Assistance Tool which included LOTH as a prioritization factor; 2) the CoC adopted a protocol that mirrors CPD 14-012, “Notice on Prioritizing Persons Experiencing Chronic Homelessness and Other Vulnerable Homeless Persons in Permanent Supportive Housing and Recordkeeping Requirements for Documenting Chronic Homeless Status”, which directs Permanent Supportive Housing resources to those with the greatest LOTH; 3) the CoC increased its Rapid Rehousing inventory with the goal of housing people within 30 days of becoming homeless; and 4) the Data Committee reviewed aggregate and project level performance data quarterly

to identify where LOTH was not decreasing.

Through the use of the VISPDAT, the CoC prioritizes the most vulnerable families. Rapid Rehousing (RRH) programs, along with all project types, are expected to serve families based on their vulnerability score, while utilizing a Housing First approach. The use of RRH has increased throughout the CoC. ESG funds are prioritized for RRH over homeless prevention services. An increase in Supportive Services for Veteran Families (SSVF) resources are being utilized to rapidly rehouse veteran families.

The CoC also aims to reduce the rate of individuals and families who return to homelessness. The Wisconsin Balance of State CoC looks at reoccurrence rates as part of the project scoring for HUD Competition each year. The WIBOSCOC looks at one and two-year returns. Winnebagoland CoC's Permanent Supportive Housing project has a 0% return, one Rapid Rehousing project has an 8% return, and another RRH project has an 11% return.

The Center for Veteran's Issues operates the HUD VASH project in Winnebago County. The Center does not fall under direct control of a single governmental entity. It works as an independent provider and servicer dedicated to ending Veteran homelessness in the state of Wisconsin.

The Oshkosh/Winnebago County Housing Authority administers the HUD-VASH program and prioritizes veterans on their waiting list.

**Helping low-income individuals and families avoid becoming homeless, especially extremely low-income individuals and families and those who are: 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); or, receiving assistance from public or private agencies that address housing, health, social services, employment, education, or youth needs.**

The City will continue to participate on the Winnebagoland Housing Coalition to provide and obtain input from organizations providing the necessary services and assist with funding where possible.

While City staff will not lead the effort to create a discharge policy, staff will participate in any efforts to create such a policy.

## **Discussion**

The City of Oshkosh does not receive any private or public funds to address homeless needs or to prevent homelessness. There are a number of public and private organizations providing these

homeless services in the community and the City supports these agencies through funding public service agencies. And, the Continuum of Care (CoC) in Oshkosh has a direct influence in addressing the needs of the homeless.

## **AP-75 Barriers to affordable housing – 91.220(j)**

### **Introduction:**

In 2020, the City of Oshkosh prepared an Analysis of Impediments to Fair Housing Choice (AI). The AI identified local jurisdictional and regional collaborative actions the participants will undertake over the next five years to address fair housing choice and housing affordability.

The City of Oshkosh Community Development staff routinely responds to questions from City residents pertaining to the Fair Housing Act and its provisions. City staff are familiar with local Ordinances and Federal laws concerning fair housing that are designed to protect all residents of the community from discrimination.

### **Actions it planned 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**

The Oshkosh public transportation system, provides bus service to LMI households in Census Tracts 1, 2, 4, 5, 7, 8, 11, 12, 14 and 15.

As City streets are resurfaced, they are designed to enable safe access for all users, including pedestrians, cyclists, motorists and transit riders, that helps create a livable community for all citizens.

Also, there are a number of State and local regulations designed to promote the orderly development and maintenance of safe, decent and sanitary housing in the community. To eliminate duplication, the City uses the building codes established by the State for uniform construction standards. Consequently, the City's building codes do not appear to hinder the development or preservation of affordable housing.

Likewise, the locally established Minimum Housing Code does not create a barrier for affordable housing. These standards parallel the National Minimum Housing Code Standards and are minimum requirements established to preserve and promote the public health, safety, comfort, personality and general welfare of the people. Their enforcement is necessary to preserve and encourage the private/public interests in housing and its maintenance.

Legal Action of Wisconsin (LAW) provides legal aid related to affordable housing, serving low-income residents living in the City. LAW staff provides assistance to residents who face eviction, are denied housing, or are forced to live in uninhabitable conditions. Information on foreclosures, consumer issues, and fair housing is also provided to the residents. LAW policies and activities promote the awareness of fair housing requirements. They provide consultation to developers and municipalities to ensure that rental and for-sale units are marketed in accordance with the affirmative marketing rules of the U.S.

Department of Housing and Urban Development. LAW ensures that all housing programs and services provided by the City, its municipalities, and LAW itself, are administered in a way that promotes fair housing on the basis of race, national origin, religion, gender, disability, and familial status.

The City contracts with the Fair Housing Center of Northeastern Wisconsin (FHCNW) for fair housing services. The FHCNW Outreach & Education Program provides fair housing training for interested parties, fair housing technical assistance for government agencies, development and distribution of fair housing educational materials, and presentations to the general public. The mission of FHCNW is to promote fair housing throughout the State of Wisconsin by combating illegal housing discrimination and by creating and maintaining racially and economically integrated housing patterns.

The City's zoning and land-use codes promote the morals, aesthetics, prosperity, health, safety and general welfare of all people in Oshkosh. These codes are constructed to allow compatible development throughout the community and are flexible enough to encourage redevelopment in the community's existing, established areas.

All residential properties are assessed on a citywide basis using market sales data of comparable properties in and around the immediate neighborhood. Citywide assessing ensures an equitable treatment of residential property and provides an incentive to those who maintain and improve their properties.

The current public policies relating to housing and, in particular, affordable housing, do not appear to be excessive, exclusionary, or discriminatory nor do they duplicate any other policies. The City will work with developers, homeowners and public agencies that encounter barriers to affordable housing to address the issues.

**Discussion:**

The City of Oshkosh will continue to monitor and review public policies for discriminatory practices, and/or impacts on housing availability during this program year. In addition to the proclamation, the City has completed the following activities to promote fair housing:

The City continues to contract with Milwaukee Fair Housing Council and has revised the Fair Housing Ordinance to reflect the current structure for investigation and disposition of complaints through a third-party contract (Fair Housing Council) as needed.

The City 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.

## **AP-85 Other Actions – 91.220(k)**

### **Introduction:**

City of Oshkosh has developed the following actions to address obstacles to meeting underserved needs, foster and maintain affordable housing, reduce lead-based hazards, reduce the number of poverty-level families, develop institutional structures, and enhance coordination between public, private housing and social service agencies.

### **Actions planned to address obstacles to meeting underserved needs**

The primary obstacle to meeting the underserved needs in the City is the limited financial resources available to address the priorities identified in the Five-Year Consolidated Plan and the lack of affordable housing in the City. Under the FY 2021 CDBG Program the City will take the following actions:

- Continue to leverage its financial resources and apply for additional public and private funds
- Continue to provide financial assistance for housing rehabilitation
- Continue to provide funding for public service activities
- Continue to do provide public facility improvements

### **Actions planned to foster and maintain affordable housing**

The City will fund the following affordable housing activities with FY 2021 CDBG funds:

- Central City Redevelopment
- Housing Rehabilitation
- Public Services

### **Actions planned to reduce lead-based paint hazards**

The City will continue to comply with Title 24 Part 35: Lead-Based Paint Poisoning Prevention in Certain Residential Structures (Current Rule) for its Housing Rehabilitation Program. In order to meet the requirements of the lead-based paint regulations, the City will take the following actions regarding housing rehabilitation:

- Applicants for rehabilitation funding receive the required lead-based paint information and understand their responsibilities.
- Staff properly determines whether proposed projects are exempt from some or all lead-based paint requirements.
- The level of Federal rehabilitation assistance is properly calculated and the applicable lead-based paint requirements determined.
- Properly qualified personnel perform risk management, paint testing, lead hazard reduction,

and clearance services when required.

- Required lead hazard reduction work and protective measures are incorporated into project rehabilitation specifications.
- Risk assessment, paint testing, lead hazard reduction, and clearance work are performed in accordance with the applicable standards established in 24 CFR Part 35, Subpart R.
- Required notices regarding lead-based paint evaluation, presumption, and hazard reduction are provided to occupants and documented.
- Program documents establish the rental property owner's responsibility to perform and document ongoing lead-based paint maintenance activities, when applicable.

### **Actions planned to reduce the number of poverty-level families**

The City's goal is to reduce the extent of poverty by actions the City can control and through work with other agencies and organizations. The City will fund the following anti-poverty activities with FY 2021 CDBG funds:

- Central City Redevelopment
- Housing Rehabilitation
- Public Services

### **Actions planned to develop institutional structure**

The City's Community Development Staff will coordinate activities among the public and private agencies and organizations in the City. This coordination will ensure that the goals outlined in the FY 2020-2024 Five-Year Consolidated Plan will be effectively addressed by more than one agency. The staff of the Economic Development Division will facilitate and coordinate the linkage between these public and private partnerships and develop new partnership opportunities in the City. This coordination and collaboration between agencies is important to ensure that the needs of the residents of the City of Oshkosh are being addressed.

### **Actions planned to enhance coordination between public and private housing and social service agencies**

The City is committed to continuing its participation and coordination with social service agencies, housing agencies, community and economic development agencies, City, county, federal, and state agencies, as well as with the private and non-profit sectors, to serve the needs of target income individuals and families in the City. The City solicits funding requests for CDBG funds annually. The Economic Development Division staff provides help and assistance as needed to assist these public

agencies that receive CDBG funding.

**Discussion:**

None

## Program Specific Requirements

### AP-90 Program Specific Requirements – 91.220(I)(1,2,4)

#### Introduction:

The City of Oshkosh will receive \$828,550 in CDBG funds for FY 2021 Program Year. The City does not expect to receive any Program Income during the FY 2021 Annual Action Plan period.

#### Community Development Block Grant Program (CDBG) Reference 24 CFR 91.220(I)(1)

Projects planned with all CDBG funds expected to be available during the year are identified in the Projects Table. The following identifies program income that is available for use that is included in projects to be carried out.

1. The total amount of program income that will have been received before the start of the next program year and that has not yet been reprogrammed	0
2. The amount of proceeds from section 108 loan guarantees that will be used during the year to address the priority needs and specific objectives identified in the grantee's strategic plan.	0
3. The amount of surplus funds from urban renewal settlements	0
4. The amount of any grant funds returned to the line of credit for which the planned use has not been included in a prior statement or plan	0
5. The amount of income from float-funded activities	0
<b>Total Program Income:</b>	<b>0</b>

#### Other CDBG Requirements

1. The amount of urgent need activities	0
2. The estimated percentage of CDBG funds that will be used for activities that benefit persons of low and moderate income. Overall Benefit - A consecutive period of one, two or three years may be used to determine that a minimum overall benefit of 70% of CDBG funds is used to benefit persons of low and moderate income. Specify the years covered that include this Annual Action Plan.	85.00%



