

Executive Summary

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

- 1. Introduction**
- 2. Summary of the objectives and outcomes identified in the Plan Needs Assessment Overview**
- 3. Evaluation of past performance**
- 4. Summary of citizen participation process and consultation process**
- 5. Summary of public comments**
- 6. Summary of comments or views not accepted and the reasons for not accepting them**
- 7. Summary**

The Process

PR-05 Lead & Responsible Agencies 24 CFR 91.200(b)

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

The following are the agencies/entities 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	STAMFORD	Grants Administration
Develop plan, administer programs, funds	Stamford Community Development	Stamford Community Development

Table 1 – Responsible Agencies

Narrative

Consolidated Plan Public Contact Information

PR-10 Consultation - 91.100, 91.200(b), 91.215(l)

1. Introduction

1 (a) 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(l)).

1(b) 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

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

Answer, 1 (a) & (b) The City is involved in Stamford Greenwich Opening Doors (SGOD) which includes representatives from the Shelter for the Homeless, Inc., Laurel House, Mutual Housing Association of Southwestern, CT, Inc., Inspirica, Inc., the Workplace, CT Coalition to End Homelessness, St. of CT Department of Mental Health and Addiction Services and Department of Housing. This is an organization that has as its base the existing Continuum of Care, but has opened its "doors" to a wide range of agency participation, extending beyond resources for the homeless to general benefits for those in transitional and supportive housing. The City has been a housing advocate for years in Stamford, using Capital funds and Zoning Ordinances to create opportunities for construction of affordable housing. As a result, when one of our non-profits seeks to develop or renovate a site their first stop is usually the Mayor's and Community Development Offices. The City's Housing Development Manager is on the steering committee for SGOD. As a result, the funding opportunities offered through the City's HOME Investment Partnerships, Neighborhood Stabilization and Community Development Block Grant programs are used extensively to assure investment in emergency shelters, facilities that provide services to the homeless (health, counseling) as well as transitional and permanent supportive housing. In housing, additional funds have been made available by the State of Connecticut for these uses (LIHTC, CHAMP). Private funds often flow to non-profit developers from the City's Affordable Housing Zoning Initiative, created with funds paid by private developers, and through the City's Commercial Linkage Ordinance.

Answer 1(c) The City does not receive ESG funds. SGOD receives funds for continuation of the HMIS system through the annual NOFA. The homeless agencies are all trained in HMIS use, and contract with the Connecticut Coalition to End Homelessness (CCEH) to provide HMIS related

data services. The greatest challenge faced now is to use the HMIS system to provide a single point of access for clients. As part of the NOFA response development process, the SGOD had a committee develop an evaluative system so that program applicants could be rated in a manner consistent with the NOFA and evaluate whether or not some programs could be combined and to determine if a new program would better serve the target population than an existing one?

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

The Consolidated Plan Process started approximately 4 months before the Plan's first year CDBG fund allocation process, and frames the Community Development Block Grant NOFA used to obtain community priority activities for CDBG funding. During the data gathering process, the City turned to the members of SGOD, and the local HMIS and PIT data housed with the Connecticut Coalition to End Homelessness. We used the 2014 update to the Stamford Master Plan, and consulted with the Town of Greenwich in assessing the moving target of needs among homeless and those who could easily become homeless. A review was made of the Comprehensive Plan of the Housing Authority of the City of Stamford. In addition, the City staff, in meetings with the Authority leadership cooperated in meeting needs for development, renovation, and sustainability. One effort in this regard will require relocating an entire Housing Authority development. In these meetings, financing opportunities and resources were charted for the upcoming five years.

The City's Community Development Citizen Participation Plan and Schedule is submitted for review by the City of Stamford Board of Representatives Housing and Community Development and Social Services Committee. This begins the process of how best to use the CDBG funds to achieve community goals. When Board approved, an email list of ___ organizations receive a NOFA containing an estimate of funds available and the City's Community Development Citizen Participation Plan and Schedule. Fund availability and program information is also published. Local non-profits submit their programs/uses, and the Board of Representatives Committee members and Mayor review these for consistency in preparation for the funding year, eventually establishing a budget.

DRAFT

Table 2 – Agencies, groups, organizations who participated

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

Economic Development related agencies that serve paid subscribers. We felt they did not share interest in low-moderate income population emphasized in this application, except as a consumer target.

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

Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
City of Stamford Master Plan, 2014 Update	City of Stamford	Emphasis on ;providing housing choice for all income groups
Greenwich Consolidated Plan	Town of Greenwich	Provision of support services Support for emergency shelters, supportive services, transitional housing
Housing Authority City of Stamford	5 Year Plan	Continued maintenance of LMI units, sustainability of new units
Vita Strategic Plan	Cooperative effort PHA, Hospital, and City	Create a West side community of wellness and opportunity

Table 3 – Other local / regional / federal planning efforts

Describe cooperation and coordination with other public entities, including the State and any adjacent units of general local government, in the implementation of the Consolidated Plan (91.215(I))

Narrative (optional):

The Consolidated Plan’s major goal areas are well served by several State programs, for example, the Neighborhood Stabilization program addresses foreclosed, blighting properties in the City’s target areas. Department of Housing Competitive Housing Assistance for Multifamily properties (CHAMP), LIHTC and HTCC have been instrumental in our housing non-profits’ efforts to create new low moderate income units, and keep existing units in good repair. In the past five years Greenwich and Stamford have jointly funded improvements to the men’s and family homeless shelters located in Stamford. Opportunities for this kind of collaboration still remain, as both communities wish to provide additional supportive housing options.

PR-15 Citizen Participation

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

Citizen Participation Outreach

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)
	Newspaper	Non-profits, Joe Citizen	___ request applications			
	Email	Non-profits	Application forms			
	Newspaper, direct mail, email	General public, non profit applicants				www.stamfordct.gov Con & Action Plan review

Table 4 – Citizen Participation Outreach

The City of Stamford’s Citizen Participation Plan is attached as Exhibit 1.

Stamford’s Consolidated Plan process included the inclusive and collaborative processes of the Stamford-Greenwich Opening Doors group (the former Stamford Continuum of Care) and the Housing Authority’s Comprehensive Plan. The extensive involvement of local non-profit developers and service providers, elected officials, staff of City Departments, lenders, private developers/planners/architects, property owners and residents is discussed in the previous Section of this Plan entitled “Consultation.”

The Stamford Community Development Office consulted with the Town of Greenwich Community Development Office with regard to each other's Consolidated Plan.

On December 30, 2014, Stamford Community Development advertised the availability of Year 41 CDBG funds, the 2013 – 2014 Consolidated Annual Performance and Evaluation Report (CAPER) and that the City would be preparing Consolidated Plan over the next 4 months. This advertisement also announced a public hearing for February 5, 2015, at which comment on housing and community development needs for the Consolidated Plan would be heard.

A Public Hearing to receive comments on the Citizen Participation Plan, the Year 39 Comprehensive Annual Performance and Evaluation Report, the local needs for housing and community development and proposals from public and non-profit organizations for meeting local needs was then held on February 5, 2015, in the Stamford Government Center, an accessible building, at 5:30 PM. The hearing was conducted by the Housing, Community Development and Social Services (HCD/SS) Committee of the Board of Representatives. The HCD/SS Committee is comprised of seven elected district representatives, most of whom represent the low income neighborhoods of Stamford.

At the hearing on February 5, recommendations were heard on the need for rehabilitation of existing assisted housing, community centers, day care centers, special needs facilities and homeless shelters. Presenters also made recommendations for the provision of public services for the homeless, the unemployed, the elderly, the disabled, youth and victims of abuse. A presenter also recommended job creation through economic development.

On [REDACTED], the Consolidated Plan was advertised for a 30 day public comment period. CDBG recipients for Year 41 were notified by email of the availability of the draft Consolidated Plan for comment. The Plan was made available at the SCD Office, the Town Clerk's Office and the library. The plan was posted on the City's web site, where it could be accessed electronically by advocates for housing, the homeless and public services.

On April 9, 2015, the Stamford Board of Finance, comprised of six elected members, reviewed and approved the Annual Action Plan. On April 21, 2015, the HCD/SS Committee voted unanimously to recommend that the proposed Annual Action Plan be approved by the entire Board of Representatives. It was placed on the Consent agenda for that day.

On May 4, 2015 the Board of Representatives approved the Annual Action Plan, and authorized the Mayor to submit the necessary plan(s) to receive funding.

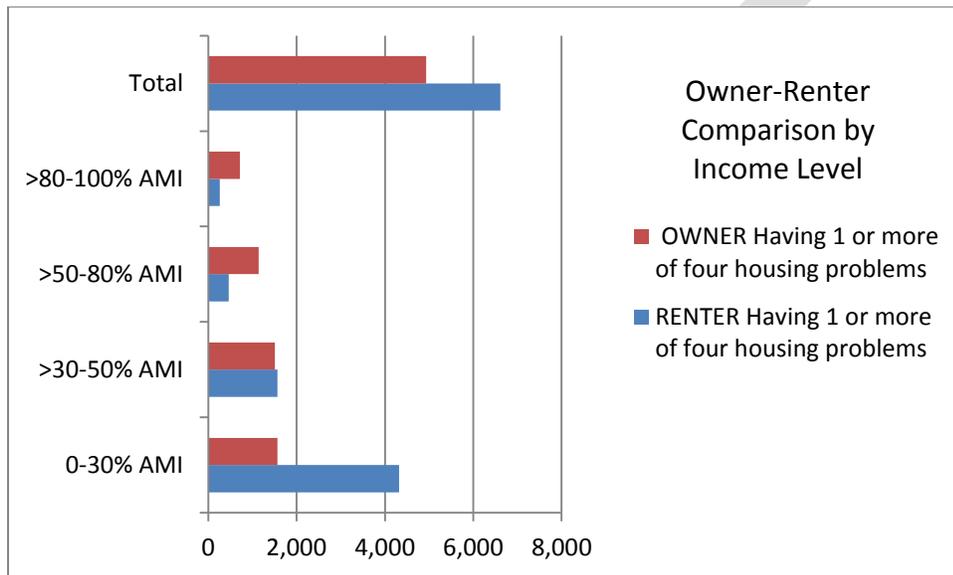
DRAFT

Needs Assessment

NA-05 Overview

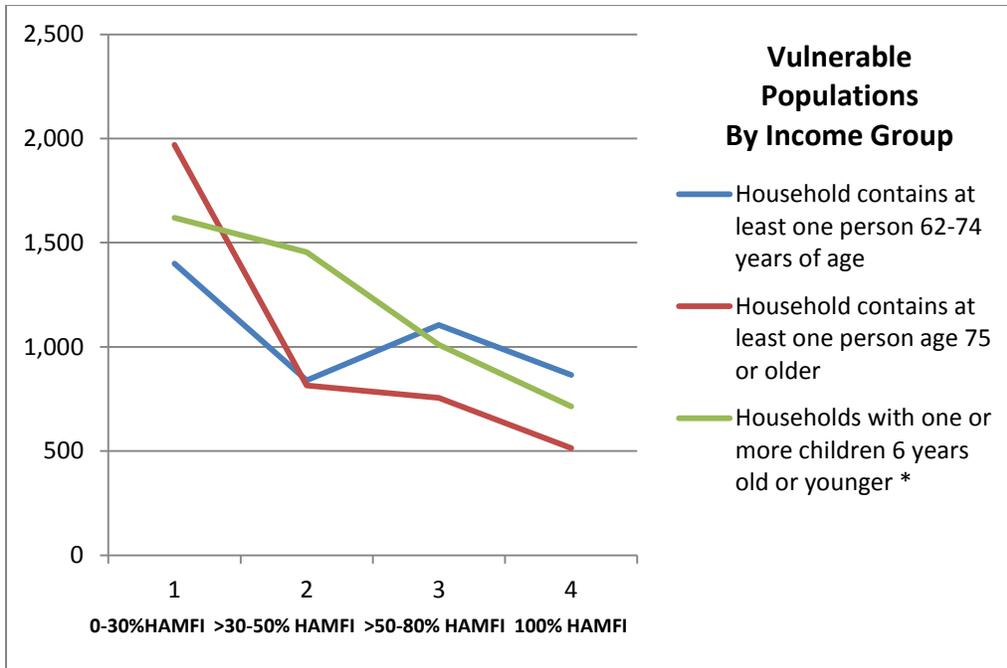
Needs Assessment Overview

The below charts are derived from the data provided by DHUD in the NA10 section, below.



The above table shows that owners with less than 80% of area median income face significant housing issues, outstripping renters needs in the 50% to 80% category. Renter and owner need is about equal for those in the 30 – 50% category. More than twice as many renters than owners face housing problems in the 0 – 30% level.

The below chart tracks need by “vulnerable population” – families with children under age 6, and elderly households 62 -74 years of age, and those with members over 75 years of age. This is done by income. The below shows that those 75 or over outnumber other vulnerable groups in the 0 – 30% of area median income category. Their number decreases in the 30 – 50% category, with households with one or more children 6 years old or younger becoming most numerous in the 30% to 50% area median income group. In the 50% to 80% category, households with persons 62 -74 years of age are most numerous, with households having children 6 years or younger next and households containing persons 72 to 74 years age being least numerous.



An interesting figure to juxtapose with the information above is economic analysis data (2000 – 2012) that indicates in the past decade, the rate of labor force participation rose fastest among the elderly labor force, aged 75 and older.¹

¹ Stamford Master Plan 2025, appendix A, “Stamford Detailed Demographic Profile, 2012, P. 18.

NA-10 Housing Needs Assessment - 24 CFR 91.205 (a,b,c)

Summary of Housing Needs

Demographics	Base Year: 2000	Most Recent Year: 2011	% Change
Population	117,083	121,784	4%
Households	45,454	45,478	0%
Median Income	\$60,556.00	\$78,201.00	29%

Table 5 - Housing Needs Assessment Demographics

Data Source: 2000 Census (Base Year), 2007-2011 ACS (Most Recent Year)

Number of Households Table

	0-30% HAMFI	>30-50% HAMFI	>50-80% HAMFI	>80-100% HAMFI	>100% HAMFI
Total Households *	8,610	6,455	6,015	4,890	19,510
Small Family Households *	3,055	2,965	2,625	2,070	9,980
Large Family Households *	490	730	530	415	1,590
Household contains at least one person 62-74 years of age	1,400	840	1,105	865	2,760
Household contains at least one person age 75 or older	1,970	815	755	515	1,520
Households with one or more children 6 years old or younger *	1,620	1,455	1,010	715	1,715
* the highest income category for these family types is >80% HAMFI					

Table 6 - Total Households Table

Data Source: 2007-2011 CHAS

Housing Needs Summary Tables

1. Housing Problems (Households with one of the listed needs)

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
NUMBER OF HOUSEHOLDS										
Substandard Housing - Lacking complete plumbing or kitchen facilities	60	115	45	20	240	10	25	30	0	65
Severely Overcrowded - With >1.51 people per room (and complete kitchen and plumbing)	235	175	125	135	670	10	0	20	0	30
Overcrowded - With 1.01-1.5 people per room (and none of the above problems)	440	460	185	105	1,190	15	90	60	45	210
Housing cost burden greater than 50% of income (and none of the above problems)	3,585	810	105	0	4,500	1,530	1,395	1,035	670	4,630
Housing cost burden greater than 30% of income (and none of the above problems)	1,065	1,625	805	285	3,780	355	540	1,115	875	2,885

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
Zero/negative Income (and none of the above problems)	170	0	0	0	170	105	0	0	0	105

Table 7 – Housing Problems Table

Data 2007-2011 CHAS
Source:

2. Housing Problems 2 (Households with one or more Severe Housing Problems: Lacks kitchen or complete plumbing, severe overcrowding, severe cost burden)

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
NUMBER OF HOUSEHOLDS										
Having 1 or more of four housing problems	4,320	1,565	465	260	6,610	1,565	1,510	1,140	715	4,930
Having none of four housing problems	1,960	2,330	2,225	1,620	8,135	495	1,050	2,185	2,295	6,025
Household has negative income, but none of the other housing problems	170	0	0	0	170	105	0	0	0	105

Table 8 – Housing Problems 2

Data 2007-2011 CHAS
Source:

3. Cost Burden > 30%

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
NUMBER OF HOUSEHOLDS								
Small Related	2,540	1,580	505	4,625	315	900	1,015	2,230
Large Related	380	360	125	865	105	250	205	560

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
Elderly	1,140	345	100	1,585	1,110	680	420	2,210
Other	1,275	750	240	2,265	360	205	580	1,145
Total need by income	5,335	3,035	970	9,340	1,890	2,035	2,220	6,145

Table 9 – Cost Burden > 30%

Data 2007-2011 CHAS
Source:

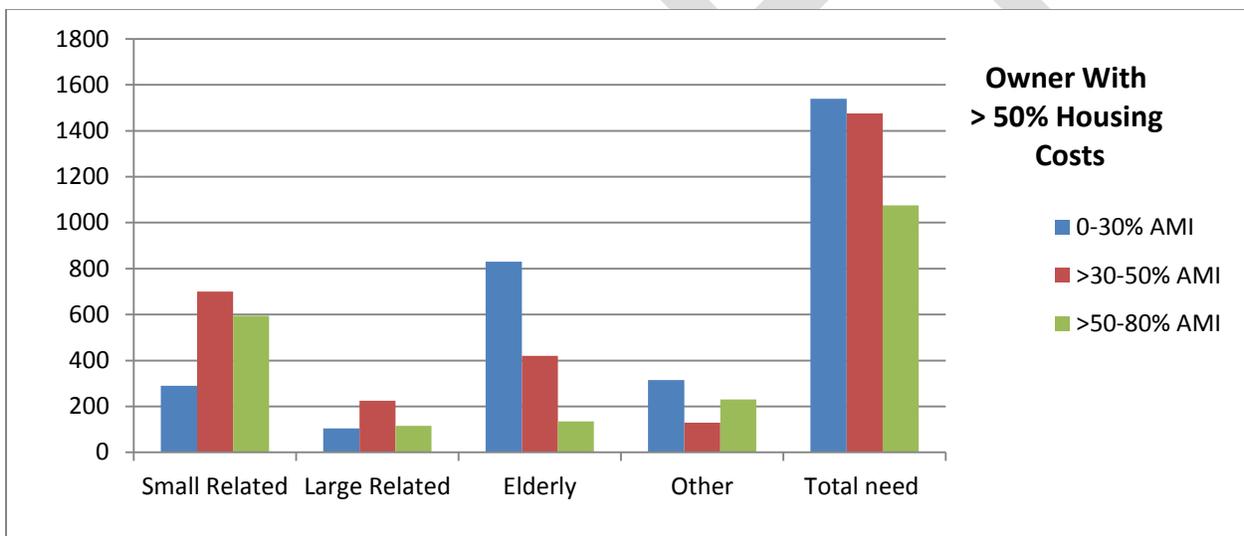
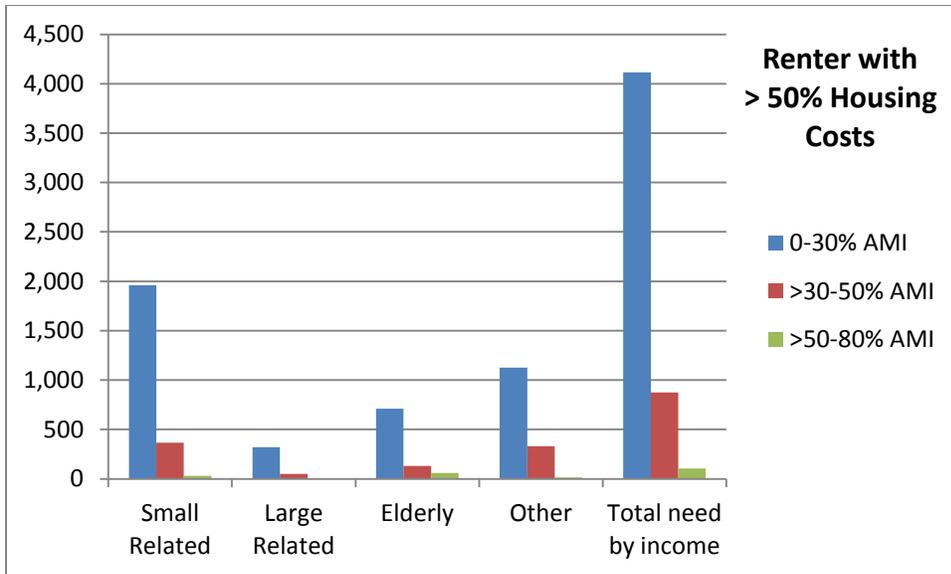
4. Cost Burden > 50%

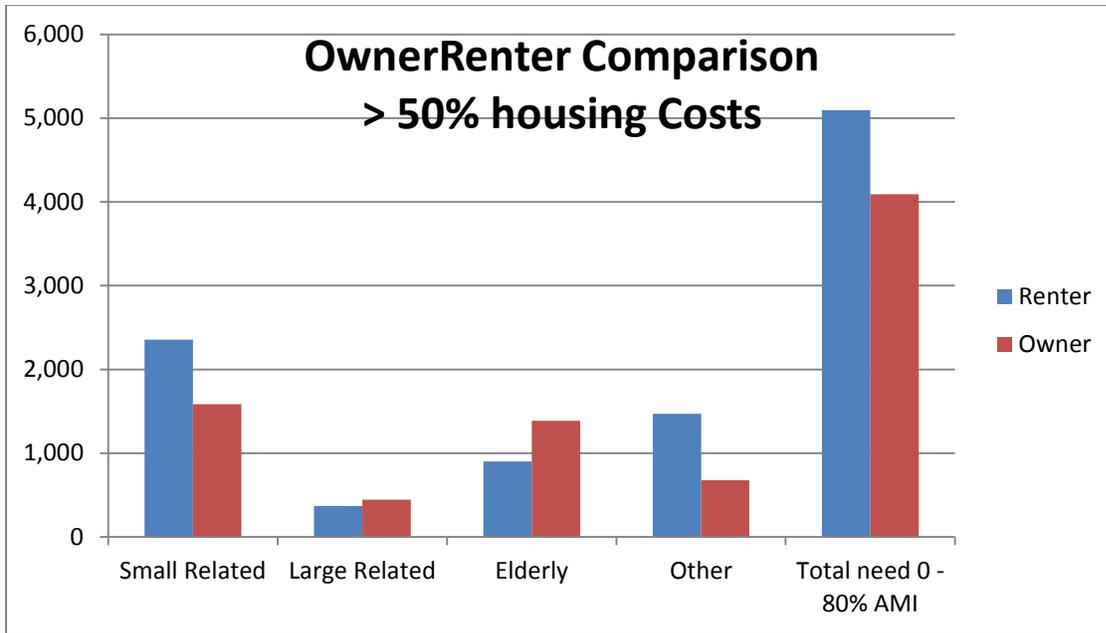
	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
NUMBER OF HOUSEHOLDS								
Small Related	1,960	365	30	2,355	290	700	595	1,585
Large Related	320	50	0	370	105	225	115	445
Elderly	710	130	60	900	830	420	135	1,385
Other	1,125	330	15	1,470	315	130	230	675
Total need by income	4,115	875	105	5,095	1,540	1,475	1,075	4,090

Table 10 – Cost Burden > 50%

Data 2007-2011 CHAS
Source:

Of renters carrying housing costs of 50% or more of income, renters in small related households earning 0 – 30% of AMI are the most impacted. Of owners carrying housing costs of 50% more of income, elderly households at 0 – 30% AMI are the most impacted. In renter-owner comparison of those paying more than 50% of income for housing costs, owner need outstrips that of renter in the large related and elderly households category. See charts below that interpret the above cost burden table:





5. Crowding (More than one person per room)

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
NUMBER OF HOUSEHOLDS										
Single family households	530	505	240	190	1,465	25	25	75	10	135
Multiple, unrelated family households	85	130	50	0	265	0	65	4	35	104
Other, non-family households	60	45	25	55	185	0	0	0	0	0
Total need by income	675	680	315	245	1,915	25	90	79	45	239

Table 11 – Crowding Information – 1/2

Data 2007-2011 CHAS

Source:

From the chart above, overcrowding is most critical for renters at 0% - 80% of AMI, in single family households. These households comprise 60% of all households experiencing overcrowding.

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
Households with Children Present								

Table 12 – Crowding Information – 2/2

Describe the number and type of single person households in need of housing assistance.

Estimate the number and type of families in need of housing assistance who are disabled or victims of domestic violence, dating violence, sexual assault and stalking.

What are the most common housing problems?

Are any populations/household types more affected than others by these problems?

Describe the characteristics and needs of Low-income individuals and families with children (especially extremely low-income) who are currently housed but are at imminent risk of either residing in shelters or becoming unsheltered 91.205(c)/91.305(c)). Also discuss the needs of formerly homeless families and individuals who are receiving rapid re-housing assistance and are nearing the termination of that assistance

CCEH has provided data for the Inspirica Rapid Rehousing Program, which looks in detail at several factors upon program entry and exit. Overall, those who left the program and appeared to have housing alternatives had established some form of income stream. Those who had not taken this step, were characterized as “stayers” and tables show to what extent income is established and source. Of those served, only 47% establish housing stability, and 55% establish an earned income source.

CCEH staff have provided the below list of factors that often combine to place a person or family at risk of homelessness. (E-mail, CCEH, February, 2015)

Employment:

- Disability which inhibits employment opportunities
- Criminal history
- Limited education, limited work history
- Child with a disability / no family respite care
- Child Care issues
- Transportation – particularly for those who work multiple part time jobs and especially for those who work hours outside of the typical bus route availability

Housing:

- Prior homeless episode
- High FMR for Stamford-Greenwich region
- Limited education, limited work history,
- Family challenges
- Domestic Violence

Income:

TFA/TANF exhaustion

- Unable to secure social security / disability income (usually takes 2-3 attempts for applicants)

If a jurisdiction provides estimates of the at-risk population(s), it should also include a description of the operational definition of the at-risk group and the methodology used to generate the estimates:

Specify particular housing characteristics that have been linked with instability and an increased risk of homelessness.

See above listing of employment, housing and income factors that increase likelihood of homelessness.

Discussion

Unfortunately hard data and counts relating to homeless or those at risk of homelessness (due to domestic violence for example) is not readily available. As a result consultation was held with the service providers for the homeless.

NA-15 Disproportionately Greater Need: Housing Problems – 91.205 (b)(2)

Assess the need of any racial or ethnic group that has disproportionately greater need in comparison to the needs of that category of need as a whole.

Introduction

0%-30% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	7,350	1,205	265
White	3,415	685	135
Black / African American	1,560	380	10
Asian	340	50	10
American Indian, Alaska Native	0	0	0
Pacific Islander	0	0	0
Hispanic	1,970	80	110

Table 13 - Disproportionately Greater Need 0 - 30% AMI

Data Source: 2007-2011 CHAS

*The four housing problems are:

1. Lacks complete kitchen facilities,
2. Lacks complete plumbing facilities,
3. More than one person per room,
4. Cost Burden greater than 30%

30%-50% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	4,845	1,740	0
White	2,165	910	0
Black / African American	760	470	0
Asian	320	60	0
American Indian, Alaska Native	0	0	0
Pacific Islander	0	0	0
Hispanic	1,550	285	0

Table 14 - Disproportionately Greater Need 30 - 50% AMI

Data Source: 2007-2011 CHAS

*The four housing problems are:

1. Lacks complete kitchen facilities,
2. Lacks complete plumbing facilities,
3. More than one person per room,
4. Cost Burden greater than 30%

50%-80% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	2,215	1,560	0
White	1,340	1,025	0
Black / African American	335	135	0
Asian	120	110	0
American Indian, Alaska Native	0	0	0
Pacific Islander	0	0	0
Hispanic	400	220	0

Table 15 - Disproportionally Greater Need 50 - 80% AMI

Data Source: 2007-2011 CHAS

*The four housing problems are:

1. Lacks complete kitchen facilities,
2. Lacks complete plumbing facilities,
3. More than one person per room,
4. Cost Burden greater than 30%

80%-100% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	2,230	2,840	0
White	1,410	1,640	0
Black / African American	185	440	0
Asian	195	200	0
American Indian, Alaska Native	0	45	0
Pacific Islander	0	0	0
Hispanic	395	470	0

Table 16 - Disproportionally Greater Need 80 - 100% AMI

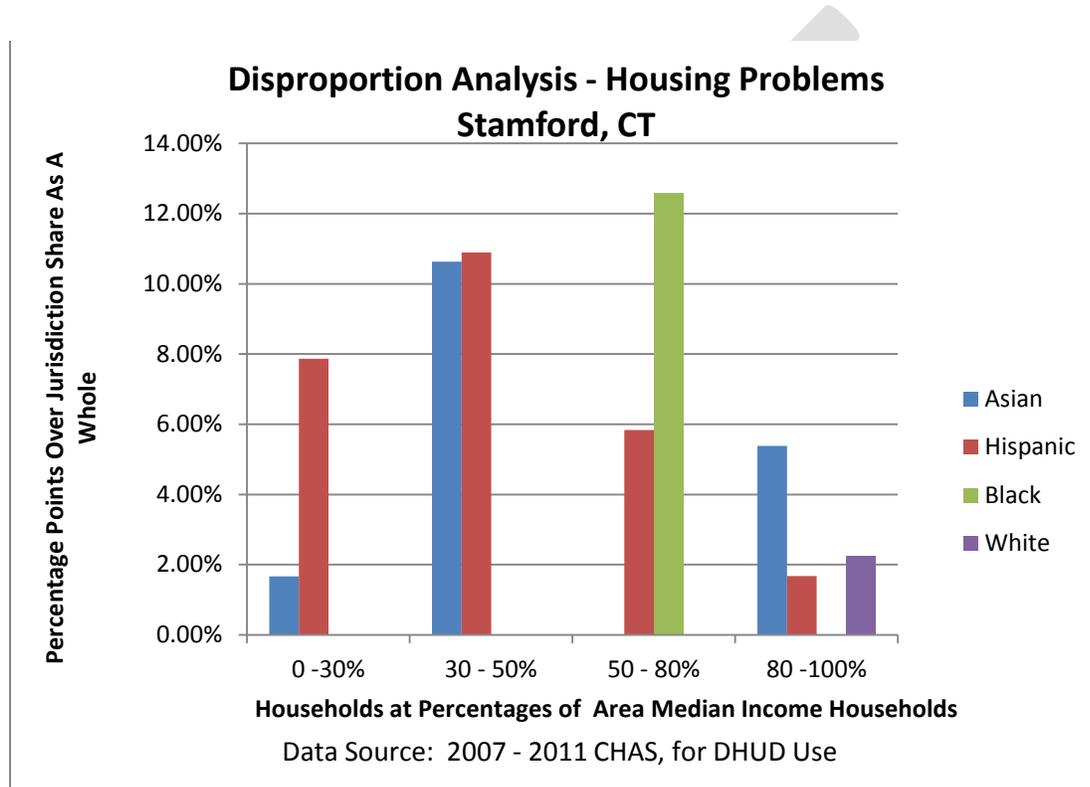
Data Source: 2007-2011 CHAS

*The four housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than one person per room, 4. Cost Burden greater than 30%

Discussion

Analysis of data provided to compare percentage share of each ethnic group versus problems incurred by households at same income level in jurisdiction as a whole is summarized below:



Housing problems are defined here as at least one of the following four: 1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than one person per room, 4. Cost Burden greater than 30%.

In evaluating this data, it should be kept in mind that there are many more households in the 0 – 50% range of income (for racial and ethnic groups of interest, 13,430 at 0% – 50% AMI, versus 8,665 in the 50% – 100% AMI range.)

NA-20 Disproportionately Greater Need: Severe Housing Problems – 91.205 (b)(2)

Assess the need of any racial or ethnic group that has disproportionately greater need in comparison to the needs of that category of need as a whole.

Introduction

0%-30% of Area Median Income

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	5,575	2,980	265
White	2,575	1,520	135
Black / African American	1,035	905	10
Asian	315	80	10
American Indian, Alaska Native	0	0	0
Pacific Islander	0	0	0
Hispanic	1,590	465	110

Table 17 – Severe Housing Problems 0 - 30% AMI

Data Source: 2007-2011 CHAS

*The four severe housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than 1.5 persons per room, 4. Cost Burden over 50%

30%-50% of Area Median Income

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	2,710	3,875	0
White	1,175	1,895	0
Black / African American	495	730	0
Asian	140	245	0
American Indian, Alaska Native	0	0	0
Pacific Islander	0	0	0
Hispanic	875	955	0

Table 18 – Severe Housing Problems 30 - 50% AMI

Data Source: 2007-2011 CHAS

*The four severe housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than 1.5 persons per room, 4. Cost Burden over 50%

50%-80% of Area Median Income

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	1,045	2,730	0
White	550	1,815	0
Black / African American	220	255	0
Asian	65	160	0
American Indian, Alaska Native	0	0	0
Pacific Islander	0	0	0
Hispanic	200	410	0

Table 19 – Severe Housing Problems 50 - 80% AMI

Data Source: 2007-2011 CHAS

*The four severe housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than 1.5 persons per room, 4. Cost Burden over 50%

80%-100% of Area Median Income

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	905	4,160	0
White	385	2,665	0
Black / African American	95	525	0
Asian	105	290	0
American Indian, Alaska Native	0	45	0
Pacific Islander	0	0	0
Hispanic	310	560	0

Table 20 – Severe Housing Problems 80 - 100% AMI

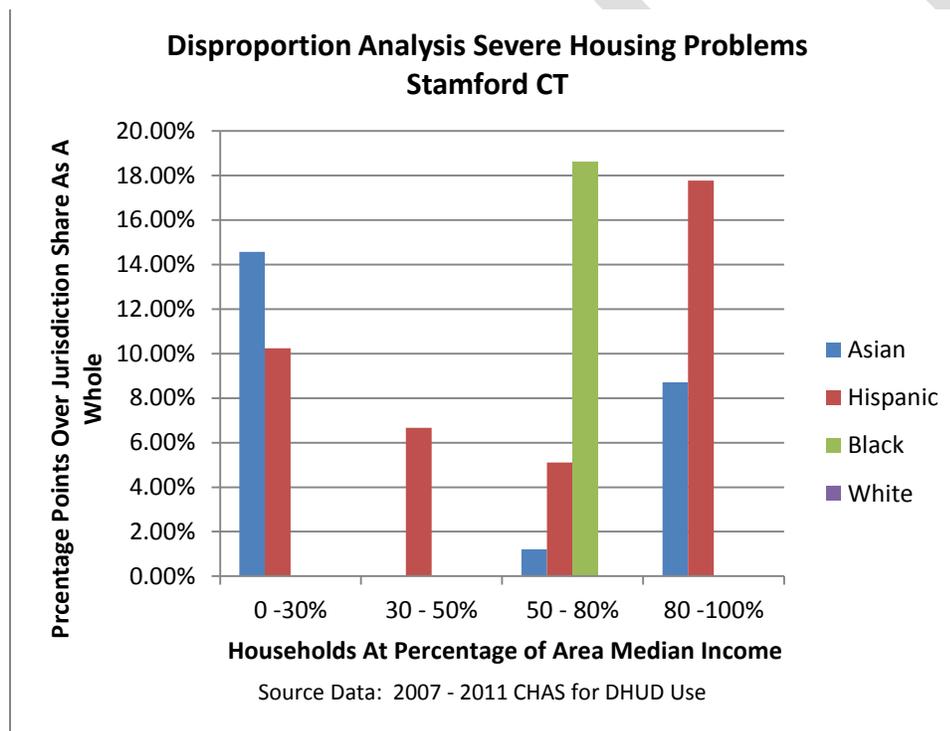
Data Source: 2007-2011 CHAS

*The four severe housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than 1.5 persons per room, 4. Cost Burden over 50%

Discussion

The chart below summarizes the above CHAS data and indicates to what degree various ethnic or racial groups exceed the share in severe housing problems experienced by all the families in that income group. To have a severe housing problem, a household must have one of the four severe housing problems: 1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than 1.5 persons per room, 4. Cost Burden over 50%



In evaluating this data, it should be kept in mind that there are many more households in the 0 – 50% range of income (for racial and ethnic groups of interest, 15,260 at 0% – 50% AMI, versus 8,655 in the 50% – 100% AMI range.)

Overall, for both categories (housing problems and severe housing problems) The most impacted ethnic/racial groups are Asian and Hispanic. The most numerous households impacted in these groups would be those earning 0% to 50% of area median income. Blacks are disproportionately impacted by housing problems (as opposed to severe housing problems) if they are in the 50% to 80% of area median income group. Whites are disproportionately

impacted by housing problems (v. severe housing problems) if they are in the 80% to 100% of area median income group.

It should be noted that disproportionate analysis begs the question of housing need in Stamford. In the 30% - 50% of AMI income bracket, 74% of households have at least one significant housing problem. Stamford is a high housing cost area. Those with the least in income pay proportionately more for housing, housing that is often of lesser quality.

DRAFT

NA-25 Disproportionately Greater Need: Housing Cost Burdens – 91.205 (b)(2)

Assess the need of any racial or ethnic group that has disproportionately greater need in comparison to the needs of that category of need as a whole.

Introduction:

Housing Cost Burden

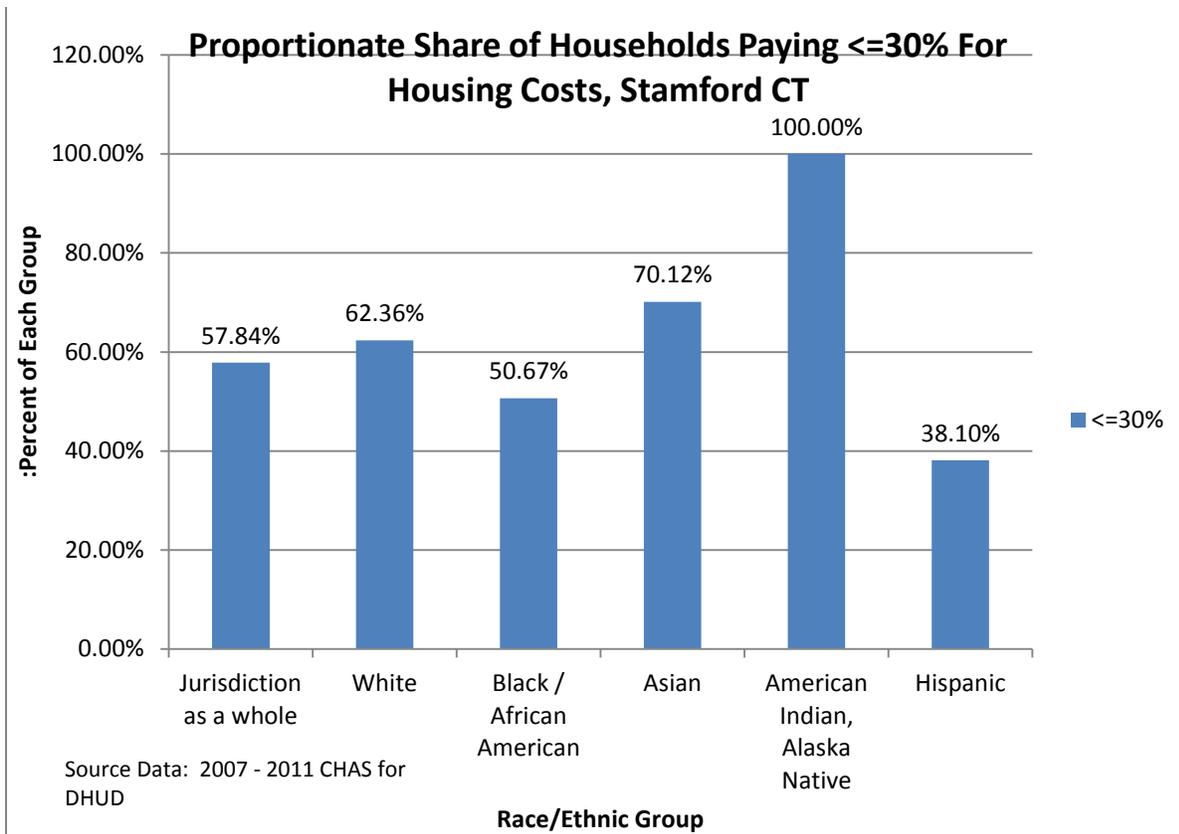
Housing Cost Burden	<=30%	30-50%	>50%	No / negative income (not computed)
Jurisdiction as a whole	26,710	9,875	9,245	350
White	18,110	5,885	4,890	155
Black / African American	3,030	1,335	1,605	10
Asian	2,335	475	445	75
American Indian, Alaska Native	45	0	0	0
Pacific Islander	0	0	0	0
Hispanic	2,730	2,095	2,230	110

Table 21 – Greater Need: Housing Cost Burdens AMI

Data Source: 2007-2011 CHAS

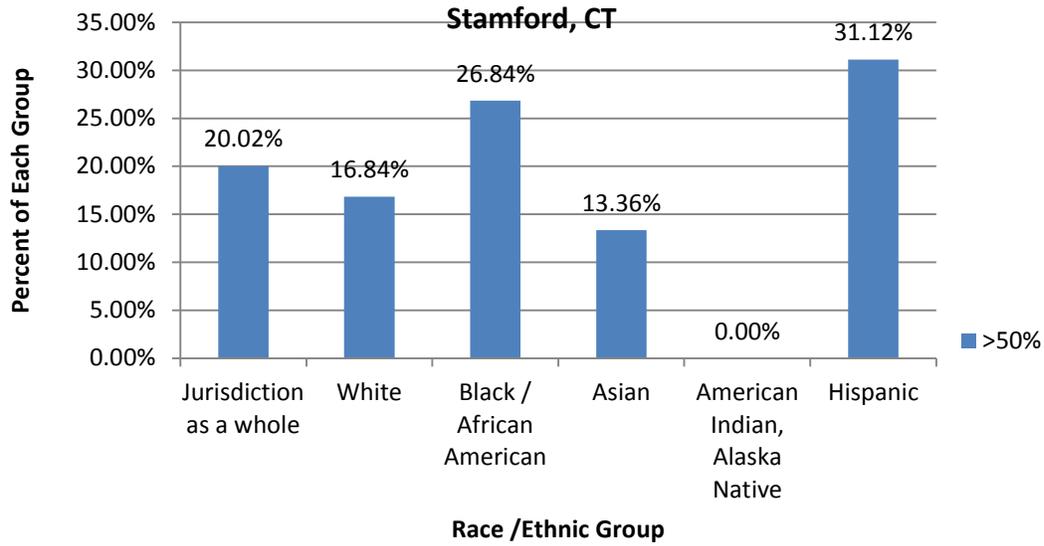
Discussion:

The chart below indicates proportionate share of ethnic/race share paying 30% or less for housing costs – the industry standard, most desirable case. 57.8% of all households presented by the CHAS data pay equal or less than 30% of income for housing costs. In comparison, White households and Asian households outstrip this percentage. Doing best are Indian households, where all (45) pay 30% or less of income for housing costs. However, Black and Hispanic households fall behind, with smaller percentages paying 30% or less. Hispanics come in dead last at 38.1%. Base data is as provided above in the CHAS DHUD chart.



The graph analysis below of households paying more than 50% of income for housing show that almost a third of Hispanic households pay at this uncomfortable amount. Hispanic and Black households both exceed the percentage of those households for the jurisdiction as a whole that pay more than 50% for housing costs.

**Proportionate Share of Households by Race/Ethnicity
Paying >50% For Housing Costs**



Source Data: 2007 - 2011 CHAS for DHUD

DRAFT

NA-30 Disproportionately Greater Need: Discussion – 91.205(b)(2)

Are there any Income categories in which a racial or ethnic group has disproportionately greater need than the needs of that income category as a whole?

If they have needs not identified above, what are those needs?

Are any of those racial or ethnic groups located in specific areas or neighborhoods in your community?

The Hispanic and Black communities have a greater need for housing solutions as seen in the data above. These groups have disproportionately larger numbers affected by “housing problems” and “severe housing problems.” Also, these groups are disproportionately represented in the analysis of those households paying 50% or more for housing costs. Black comes in at 26.8% and Hispanics at 31.1%, compared to overall percentage of 20.02%.

Data provided by DHUD regarding racial composition of households impacted by housing problems is not cross referenced to census tract. A manual review of racial data by census tract compared to census tract data for housing problems suggests that most of the impacted Hispanic and Black households are located in the traditionally poor in income and poor housing quality census tracts: 215, 214, 218.02, and 223 (West Side, East Side and Waterside).

NA-35 Public Housing – 91.205(b)

Introduction

Totals in Use

	Program Type								
	Certificate	Mod-Rehab	Public Housing	Vouchers			Special Purpose Voucher		
				Total	Project - based	Tenant - based	Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
# of units vouchers in use	0	52	493	1,534	76	1,458	0	0	0

Table 22 - Public Housing by Program Type

*includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition

Data Source: PIC (PIH Information Center)

Characteristics of Residents

	Program Type								
	Certificate	Mod-Rehab	Public Housing	Vouchers			Special Purpose Voucher		
				Total	Project - based	Tenant - based	Veterans Affairs Supportive Housing	Family Unification Program	
Average Annual Income	0	10,944	17,882	18,502	15,637	18,651	0	0	
Average length of stay	0	3	8	6	2	6	0	0	
Average Household size	0	1	2	2	1	2	0	0	
# Homeless at admission	0	0	0	0	0	0	0	0	

	Program Type							
	Certificate	Mod-Rehab	Public Housing	Vouchers			Special Purpose Voucher	
				Total	Project - based	Tenant - based	Veterans Affairs Supportive Housing	Family Unification Program
# of Elderly Program Participants (>62)	0	4	192	374	27	347	0	0
# of Disabled Families	0	8	107	222	17	205	0	0
# of Families requesting accessibility features	0	52	493	1,534	76	1,458	0	0
# of HIV/AIDS program participants	0	0	0	0	0	0	0	0
# of DV victims	0	0	0	0	0	0	0	0

Table 23 – Characteristics of Public Housing Residents by Program Type

Data Source: PIC (PIH Information Center)

Race of Residents

Race	Program Type								
	Certificate	Mod-Rehab	Public Housing	Vouchers			Special Purpose Voucher		
				Total	Project - based	Tenant - based	Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
White	0	11	143	597	24	573	0	0	0
Black/African American	0	41	313	920	52	868	0	0	0
Asian	0	0	3	7	0	7	0	0	0
American Indian/Alaska Native	0	0	6	6	0	6	0	0	0

Program Type									
Race	Certificate	Mod-Rehab	Public Housing	Vouchers			Special Purpose Voucher		
				Total	Project - based	Tenant - based	Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
Pacific Islander	0	0	28	4	0	4	0	0	0
Other	0	0	0	0	0	0	0	0	0

*includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition

Table 24 – Race of Public Housing Residents by Program Type

Data Source: PIC (PIH Information Center)

Ethnicity of Residents

Program Type									
Ethnicity	Certificate	Mod-Rehab	Public Housing	Vouchers			Special Purpose Voucher		
				Total	Project - based	Tenant - based	Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
Hispanic	0	10	131	396	15	381	0	0	0
Not Hispanic	0	42	362	1,138	61	1,077	0	0	0

*includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition

Table 25 – Ethnicity of Public Housing Residents by Program Type

Data Source: PIC (PIH Information Center)

Section 504 Needs Assessment: Describe the needs of public housing tenants and applicants on the waiting list for accessible units:

Data provided indicates that 100% of public housing tenants request accessibility features, and 100% of voucher holders request accessibility. No data on waiting list requests is given.

Most immediate needs of residents of Public Housing and Housing Choice voucher holders

The Charter Oak Communities (aka the Housing Authority of the City of Stamford) PHA sees the need for its tenants to achieve greater self sufficiency, that is, an established income stream from work/job. Within its Mission statement is the following:

“Supporting our residents through creative engagement and social services to become more self sufficient, economically self sustaining and respected contributors to their neighbors and the community.”

To that end, the Authority has a housing self-sufficiency program and focus on household based economic development. Tenants that require less subsidy assist the Authority’s bottom line. Section 8 certificates can assist more people, and public housing developments will each come closer to financially carrying themselves in a system of “project based budgeting.”

How do these needs compare to the housing needs of the population at large

Those at the lowest income levels (0 – 30% of area median income) are at most risk of not being able to make the rent. Any household crisis endangers a rent payment. Learning to cope, manage finances and increase income/reliability of income is key to establishing self sufficiency. Those receiving assistance through the housing authority stand a greater chance of receiving supportive services that will help them address these issues – and, they never have to pay over 30% of their income for rent.

Discussion

A critical element of housing authority services, and resident needs are not seen in the data presented by DHUD above. Comparison of the above data with the same information from the last consolidated plan of five years ago show that housing authority units were significantly higher five years ago: 4178. The difference is composed of three factors: the number of housing authority units that have been moved to developments managed by Rippowam Corporation, the non-profit development affiliate of the housing authority, the number of Section 8 certificates which are included in the last Consolidated Plan’s table, and the number of state originated affordable units managed and operated by the housing authority. Vidal Court, a state affordable housing development, is now being redeveloped using the HOPE VI model. Vidal Court alone had 216 units, and will become a 300+ mixed income development.

As a result, the policies HUD wishes fulfilled in its prescribed PHA five year plan format impact fewer and fewer units.

NA-40 Homeless Needs Assessment – 91.205(c)

If data is not available for the categories "number of persons becoming and exiting homelessness each year," and "number of days that persons experience homelessness," describe these categories for each homeless population type (including chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth):

Introduction:

The City of Stamford relies upon the agency specializing in serving the Homeless for data and solutions/programs for this target population: Stamford-Greenwich Opening Doors (SGOD). It was formerly known as the Stamford-Greenwich Continuum of Care, but changed its dba to acknowledge commitment to the principles and practice of the federal and state Opening Doors approach to homelessness. Backing up SGOD is the Connecticut Coalition to End Homelessness, which consults to the SGOD in relation to the annual Point In Time survey (PIT) and the data gathering/analysis system HMIS. Data presented is as per the HMIS system emergency Shelter Demographic for SGOD, 10/11 – 9/12.

For households with adults and children, SGOD shelter capacity is 21 beds plus overflow cribs, sheltering 7 families for durations of 2 months. Hence the survey number of 49 households with adults and children served, in the dormitory like setting of Inspirica's Franklin Street facility. This number is reflected in below data. There is always a waiting list for this facility. In November, 2014, Inspirica opened an additional 21 beds at this facility. There is still a waiting list.

Homelessness Experienced by Clients Served at Inspirica 10/11 – 9/12

Length of Time Since Last Permanent Residence Total Number of Homeless Episodes in Last Three Years	Column Labels						Total	Total %
	1-One, First time homeless		2-Two or Three times		3-Four or more episodes			
1-Less than one month	4	16.00%	5	23.81%	1	33.33%	10	20.41%
2-One to three months	3	12.00%	2	9.52%		0.00%	5	10.20%
3-More than three months but less than six months	6	24.00%	1	4.76%		0.00%	7	14.29%
4-More than 6 months but less than one year	3	12.00%	4	19.05%	1	33.33%	8	16.33%
5-Over 1 year	9	36.00%	9	42.86%	1	33.33%	19	38.78%
Grand Total	25	100.00%	21	100.00%	3	100.00%	49	100.00%

Sixty nine per cent had been homeless for more than three months upon entry, with over one half of that number homeless for over one year.

The chart below provides information on residence of the same households as above before their time at Inspirica. For those who did not migrate from a different homeless program, the mark of most likely to become homeless is experiencing “doubling up” or release from a treatment center of some type. Only 10% lost their “own” housing, rental or other.

Residence prior to program entry Length of time at residence prior to program entry	1-One week or less		2-More than one week, but less than one month		3-One to three months		4-More than three months, but less than one year		5-One year or longer		Total	Total %
	#	%	#	%	#	%	#	%	#	%	#	%
1-Another homeless program		0.00%	2	4.08%	20	40.82%	6	12.24%	1	2.04%	29	59.18%
2-Own private rental or owned housing	1	2.04%	1	2.04%		0.00%		0.00%	3	6.12%	5	10.20%
3-Doubled up in family or friend's housing	2	0.0408	4	8.16%	3	0.0612	2	4.08%	2	4.08%	13	26.53%
6-Hospital or treatment center		0		0.00%	1	0.0204	1	2.04%		0.00%	2	4.08%
Grand Total	3	6.12%	7	14.29%	24	48.98%	9	18.37%	6	12.24%	49	100.00%

The tables below provide information on race and ethnicity of the 49 subject households. Black or Afro American is represented in greater proportion than in the Stamford population as a whole: 51.02% versus 14.5% in the population as a whole. However, only 42 percent originate in Stamford, while 15% originate outside of Connecticut. Eight per cent indicated their last permanent residence as Norwalk, Connecticut. The number of Hispanic ethnicity among the sample also exceeds that for Stamford; Stamford is 26.5% Latino, while the Shelter sample is 33% Latino.

Values		
Race	Count	Percent
1-Black or African American	25	51.02%
2-White	22	44.90%
3-Asian/Pacific Islander	2	4.08%
Grand Total	49	100.00%
Ethnicity	Count	Percent
1-Hispanic/Latino	16	32.65%
2-Non-Hispanic/Non-Latino	33	67.35%
Grand Total	49	100.00%

Nature and Extent of Homelessness: Sheltered, Adults only PIT 2014(Optional)

Race:	Sheltered:	Unsheltered (optional)
White	70 (41%)	
Black	93 (54%)	
Asian/Native American/Multiple	8 (5%)	
Ethnicity:	Sheltered:	Unsheltered (optional)
Hispanic	44 (26%)	

The chart above provides the Point in Time (PIT) data for sheltered adult homeless by race and ethnicity. Based on information from Shelter for the Homeless administrators, much of the shelter population is not directly related to the community in which the shelter is located. As seen above, Black proportion of the Shelter population does not mirror that of Stamford. Per the Census ACS 2013, Stamford’s population was 14.5% Black. Hispanic, however, is more typical of the Stamford ACS figure of 26.5% Hispanic.

Estimate the number and type of families in need of housing assistance for families with children and the families of veterans.

The PIT for 2014 indicates a total of 89 adult-child households in shelters. These families are in need of permanent housing. The PIT (Point In Time) count of unsheltered homeless made in 2013 indicates that 7 families, composed of 7 adults and 11 children, were unsheltered at the time of the PIT. For adults without children, 103 were unsheltered, including 6 youth – persons of 18-24 years of age. Stamford holds 19% of the state’s unsheltered families, and 15% of the state’s homeless adults without children and youth. The 2013 PIT data per CCEH is:

Stamford had approximately 121 unsheltered adults and children CT PIT 2013, the last available unsheltered count.

Racial breakout (approximate)

Asian

1

Black or African-American	66
Other	17
White	37
	<hr/>
	121
Ethnic breakout (approximate)	
Hispanic	67
Non-Hispanic	54
	<hr/>
	121

Describe the Nature and Extent of Homelessness by Racial and Ethnic Group. See above charts’ summary of ethnicity and race for sheltered and unsheltered.

Describe the Nature and Extent of Unsheltered and Sheltered Homelessness.

The best data is that related for sheltered families above. This indicates that homelessness is chronic; and, that almost half of those housed in Stamford’s Inspirica facility spent up to the previous 3 months at a different shelter facility. Also, data indicates that the homeless population is mobile – only 42% originate in Stamford. Hence, there is no reason to expect that racial and ethnic breakdowns of shelter users would relate to Stamford numbers in this regard.

Discussion:

Available shelter space and supportive housing is summarized below:

Facilities and Housing Targeted to Homeless Households

	Emergency Shelter Beds		Transitional Housing Beds	Permanent Supportive Housing Beds	
	Year Round Beds (Current)	Voucher / Seasonal / Overflow Beds	Current	Current	Under Development

	Emergency Shelter Beds		Transitional Housing Beds	Permanent Supportive Housing Beds	
	Year Round Beds (Current)	Voucher / Seasonal / Overflow Beds	Current	Current	Under Development
Households with Adult(s) and Child(ren)	36		63	17	
Households with Only Adults	107		26	146	14*
Chronically Homeless Households				35	
Veterans					
Unaccompanied Youth					

*Project Lighthouse, 2 units for veterans, and 2 for chronically homeless.

As the population seeking shelter is, in a way, a community unto itself, with its members originating in city/towns up and down I-95, analysis of need must be based upon the experience of the community's shelter providers. The SGOD has been proactive in establishing planning relationships with shelter providers in Norwalk and Bridgeport. It has also supported an extensive and perhaps key type of residence required for this population – supportive housing, for those with conditions that require assistance in transition to self-responsibility and maintenance of living space. Also key in the Stamford area is housing cost. Inspirica is now providing family residences at affordable rents to those who would otherwise be homeless because of lack of funds for typical Stamford rents. They are subsidizing these units with private funds. Even for the single homeless money is a critical piece of any solution: 50% of single adult Pacific House shelter residents hold jobs. There is a role in this community for the deep subsidy housing unit.

NA-45 Non-Homeless Special Needs Assessment - 91.205 (b,d)

Introduction:

The special needs assessment is reliant upon Census ACS data (2009 -2013 five year estimates) and data collected by those delivering health and/or housing programs to those with HIV-AIDS.

Describe the characteristics of special needs populations in your community:

The ACS identifies approximately 10,000 of Stamford's residents with some type of disability. Fifty percent of these have incomes less than 125 per cent of the 2013 poverty level of \$13,924

What are the housing and supportive service needs of these populations and how are these needs determined?

Housing needs for this population come to light through the activities of the non profit disabled advocacy/service organizations. Some of this is evidenced in applications for Community Development Block Grant Funds. For example, one housing complex requested funds to reconfigure bath facilities for easy entrance for elderly and physically disabled. Accessible rest rooms in public areas of activity centers/senior housing have also been addressed.

Discuss the size and characteristics of the population with HIV/AIDS and their families within the Eligible Metropolitan Statistical Area:

Connecticut Department of Health records indicate that statewide, as of 12/2014, there were 10,637 cases of people living with AIDS/prevalent HIV infection. Of that number, 511 reside in Stamford. Approximately 70% are male. Twenty five per cent are white, 27% are Hispanic, and 47% are black. Fifty two per cent exhibit risk behaviors, i.e., intravenous drug use and males having sex with males. Three per cent are "pediatric", that is, less than 13 years of age. (Source, CT DPH HIV Surveillance :Program, People Living with HIV 2013 (with data available in 2014 from eHARS.)

The affected population is addressed through monitoring and care offered by the Stamford Health Department, and medications and counseling through Stamford Cares. Inspirica maintains McKinney House in Stamford, supportive housing for singles with HIV. Inspirica also maintains a two unit McKinney house in Fairfield for families in which one member has HIV/AIDS.

Discussion: Non homeless special needs population can easily become homeless. This population is vulnerable, and exhibit many of the issues cited above in Needs Assessment, (Source, staff, CCEH, February, 2014):

NA-50 Non-Housing Community Development Needs – 91.215 (f)

Describe the jurisdiction’s need for Public Facilities:

How were these needs determined?

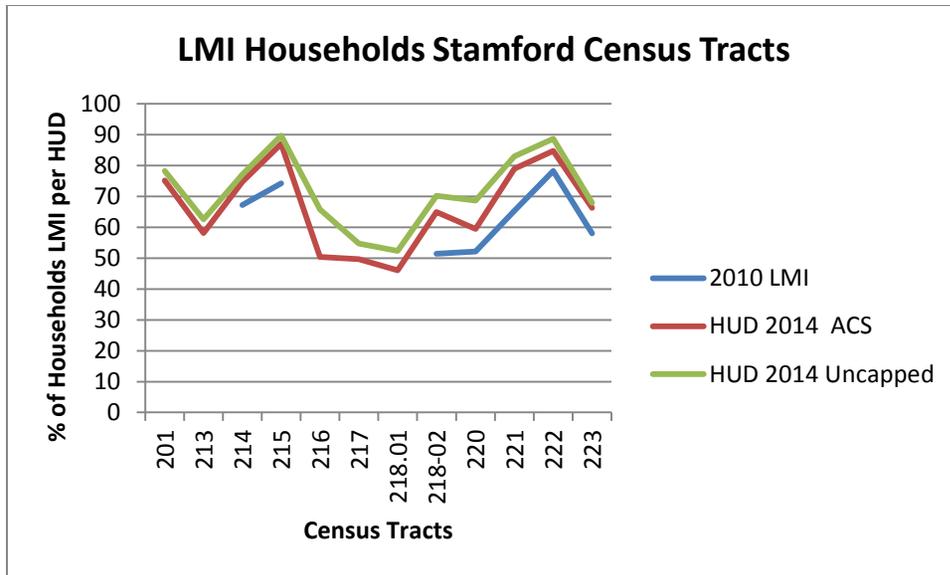
The City of Stamford has adopted a policy that discourages use of limited CDBG funds for high cost public facilities. Stamford will not use CDBG funds for this purpose. The Board of Representatives has felt that all tracts should be addressed by local capital improvement or, if eligible, (e.g. Dock Street Connector) state special facility dollars.

Describe the jurisdiction’s need for Public Improvements: The City has a continued to assure usefulness of facilities that serve the CDBG target population. Child Care facilities continue to require major renovations as do community service buildings (Food Bank, Yerwood and Lathon Wider Centers, Dental/Health service locations)

How were these needs determined?

The non profits that use these facilities seek assistance through the CDBG Annual Plan development process. Their requests, and area/clientele eligibility under CDBG is evaluated. As most of these requests result in enhanced services to the extremely low income, they are determined to be a need under CDBG, though often CDBG funds are so limited now that they can’t address all the needs presented.

Describe the jurisdiction’s need for Public Services: As per the chart below, the census tracts that were low income eligible CDBG tracts for our last Consolidated Plan have lost ground; they are now “poorer.” And, one additional tract (213) now qualifies for CDBG funding if traditional capped values are used. If “uncapped” figures are used, activities in 213, 216 and 218.01 would now qualify for CDBG assistance on an areal basis. With larger low income populations more services are required than previously. The number of low income households have increased, and living costs, especially for housing, have continued to increase in our high cost area. Food and energy costs continue to increase. The “squeeze” is on for low income residents of these impacted census tracts. The census tracts qualifying for CDBG assistance, (capped, >51% LMI) are: 201,213,214, 215,218.02, 220, 221, 222, 223. In 2010, Needs are greater than 5 years ago.



How were these needs determined?

The active non profit community in Stamford monitors many of the social service needs for the low income population: they respond to changes in ethnicity of clients in need, as well as location and types of need. These agencies present their case for assistance and analysis of need during the CDBG Annual Plan development process.

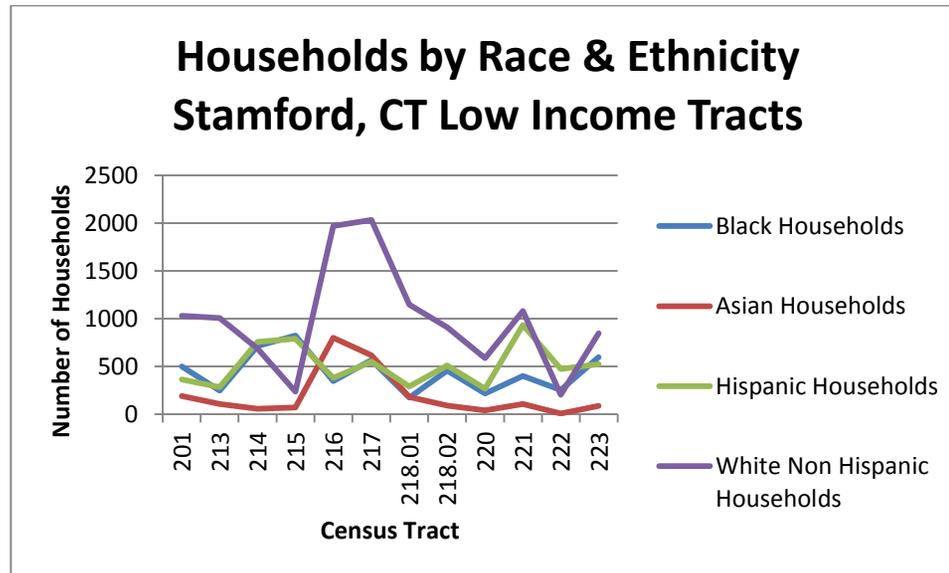
Housing Market Analysis

MA-05 Overview

Housing Market Analysis Overview:

The housing market review indicates a need existing for deep subsidy rental units. It also shows that in the CDBG eligible tracts, there is an increased need for this housing – low moderate income households experiencing housing problems have increased. This has occurred despite the build up of LIHTC developments and renewal of low-moderate public housing in the target areas.

Of interest is that these affected census tracts, though clustered around/near the downtown, remain desirable for those constructing mixed income developments, and though these are the tracts with higher minority concentrations, diversity remains viable:



MA-10 Number of Housing Units – 91.210(a)&(b)(2)

Introduction

All residential properties by number of units

Property Type	Number	%
1-unit detached structure	18,483	38%
1-unit, attached structure	2,839	6%
2-4 units	9,836	20%
5-19 units	5,346	11%
20 or more units	12,115	25%
Mobile Home, boat, RV, van, etc	41	0%
Total	48,660	100%

Table 26 – Residential Properties by Unit Number

Data Source: 2007-2011 ACS

Unit Size by Tenure

	Owners		Renters	
	Number	%	Number	%
No bedroom	43	0%	1,591	8%
1 bedroom	1,993	8%	6,218	31%
2 bedrooms	6,485	25%	7,807	39%
3 or more bedrooms	17,114	67%	4,227	21%
Total	25,635	100%	19,843	99%

Table 27 – Unit Size by Tenure

Data Source: 2007-2011 ACS

Describe the number and targeting (income level/type of family served) of units assisted with federal, state, and local programs.

A summary of housing available for homeless shelter, transitional, and permanent supportive housing is seen in the table marked ____ in attachment A. A total of 409 year round beds are available through these programs.

A summary of all assisted housing is provided in the State of Connecticut's 2013 Affordable Housing Appeals List – Exempt Municipalities, which shows Stamford has 16.05 % of its housing units (of total 50,573 units reported in 2010 Census) as affordable. The list indicates 4863 units governmentally assisted, which would include Housing Authority, Section 202 facilities, and state assisted housing complexes (Vidal Court, Scofield Manor.) In addition, there are 326 CHFA assisted mortgages, and 1,295 deed restricted units. The last would include the City's Below Market Rate units. Of the 19 non housing authority housing complexes listed on the HUD Hartford site as containing subsidized housing, 11 are for elderly.

Provide an assessment of units expected to be lost from the affordable housing inventory for any reason, such as expiration of Section 8 contracts.

Foreclosure endangers units affordable by virtue of mortgage deed restrictions. Approximately 4 units a year come to our attention in this regard. The largest 221 (d)(3) endangered project (121 units) was refinanced by a partnership of 2 local non-profit housing organizations capitalizing on project based section 8, tax credits and state funds. HOME funds also contributed to renovations of the units.

Does the availability of housing units meet the needs of the population?

It is clear that there is a need of the Stamford population for affordable rental housing. The charts above indicate that units most likely to be used by small families and "other" (0, 1, & 2 Bedrooms) total 15,616. The total of small households paying over 30% and those paying over 50% of their income for housing totals 6,745. This indicates 43% of units are renting at an unaffordable amount for the households occupying them. From a market perspective, this could change if more units were 'hunting' tenants (driving down rents due to competition) or if incomes were increased significantly among the households concerned (decreasing the proportion of household income going towards rent.) Right now, there are not enough affordable units for the populations most in

need - low income small families. This is also true for those classified as “other” the next largest group to have large numbers paying over 50% of their income for housing.

Owners who are elderly also experience stress regarding housing costs and income. The charts in the needs section of this report indicate that 2,925 owners with household income of less than 50% AMI pay over 50% of their income for housing costs. Of this number, 1,250 (43%) are elderly. There is a critical need for relief to limited income homeowners, especially the more vulnerable elderly. It is also most likely that this group will not be able to keep up with costs for repair/accessibility renovations to their homes.

Describe the need for specific types of housing:

As shown in the needs sections above, there is a need for affordable rental units for small families and those classified as “other.” Increasing the number of these units will start to drive rents down. However, our experience with new 2 bedroom units constructed in the City’s South End shows that renters will come from outside of Stamford to take many new units. The only real relief for local lower income small families now paying more than 30% of their income for rent is actual rental assistance/subsidized rents/below market units.

For the low-income elderly homeowners paying over 50% of their income for housing costs, the ability of the owner to convert equity in their home to income must be reviewed. If this is not a viable option, and the homeowner is capable of “aging in place” assistance in making necessary home repairs could be a vital piece of the housing puzzle. With this assistance, the amount of household funds going to housing would at least not be increased. Additional quality subsidized rental housing for elderly could also assist those willing to change residence.

Discussion

The CDBG and HOME funds coming in to the City of Stamford have been reduced in the last 4 years. This presents a significant obstacle to meeting underserved needs within the framework of this funding. Year 40 funding at \$897,738 was 29% less than the City’s Year 36 award, the first year of our last five year consolidated planning period. This Year 41 award of _____ reflects the latest of annual cuts. (Note, the cut experienced in year 38, was a 30% cut from year 36.) These cuts in funding resulted in City leadership choosing to fund the most critical of services for those with underserved needs. So, for example, the need for housing meant that homeless programs and shelters would receive priority, and any housing rehabilitation would address units providing shelter to those with lowest incomes. For those suffering from hunger, food banks would be funded. As funds were not available to significantly fund major projects in the target areas, leaders chose to provide modest funding to organizations in the neighborhoods (CBDOs) that could monitor their areas and work to improve the general living environment. Unfortunately, the decrease in CDBG and HOME fund awards has meant that there is no choice but to “do less with less.” Given housing needs noted above, it is anticipated that funds will be used to at least maintain existing housing stock for low income elderly and subsidized small family housing. It is unlikely that CDBG or HOME funds can contribute to significant development of additional housing for these target populations. The City will attempt to utilize its Below Market Rate housing development zoning and Linkage ordinances to generate additional sources of assistance for the target market. The City will also look to working with the federal government and the State to utilize any newly available Housing Trust fund monies for affordable, deep subsidy housing units.

MA-15 Housing Market Analysis: Cost of Housing - 91.210(a)

Introduction

Cost of Housing

	Base Year: 2000	Most Recent Year: 2011	% Change
Median Home Value	306,700	571,400	86%
Median Contract Rent	932	1,348	45%

Table 28 – Cost of Housing

Data Source: 2000 Census (Base Year), 2007-2011 ACS (Most Recent Year)

Rent Paid	Number	%
Less than \$500	2,100	10.6%

Rent Paid	Number	%
\$500-999	3,451	17.4%
\$1,000-1,499	6,678	33.7%
\$1,500-1,999	5,015	25.3%
\$2,000 or more	2,599	13.1%
Total	19,843	100.0%

Table 29 - Rent Paid

Data Source: 2007-2011 ACS

Housing Affordability

% Units affordable to Households earning	Renter	Owner
30% HAMFI	2,155	No Data
50% HAMFI	5,260	265
80% HAMFI	11,535	990
100% HAMFI	No Data	3,230
Total	18,950	4,485

Table 30 – Housing Affordability

Data Source: 2007-2011 CHAS

Monthly Rent

Monthly Rent (\$)	Efficiency (no bedroom)	1 Bedroom	2 Bedroom	3 Bedroom	4 Bedroom
Fair Market Rent	1,095	1,327	1,648	2,052	2,553
High HOME Rent	1,124	1,246	1,498	1,723	1,902
Low HOME Rent	1,123	1,204	1,445	1,669	1,862

Table 31 – Monthly Rent

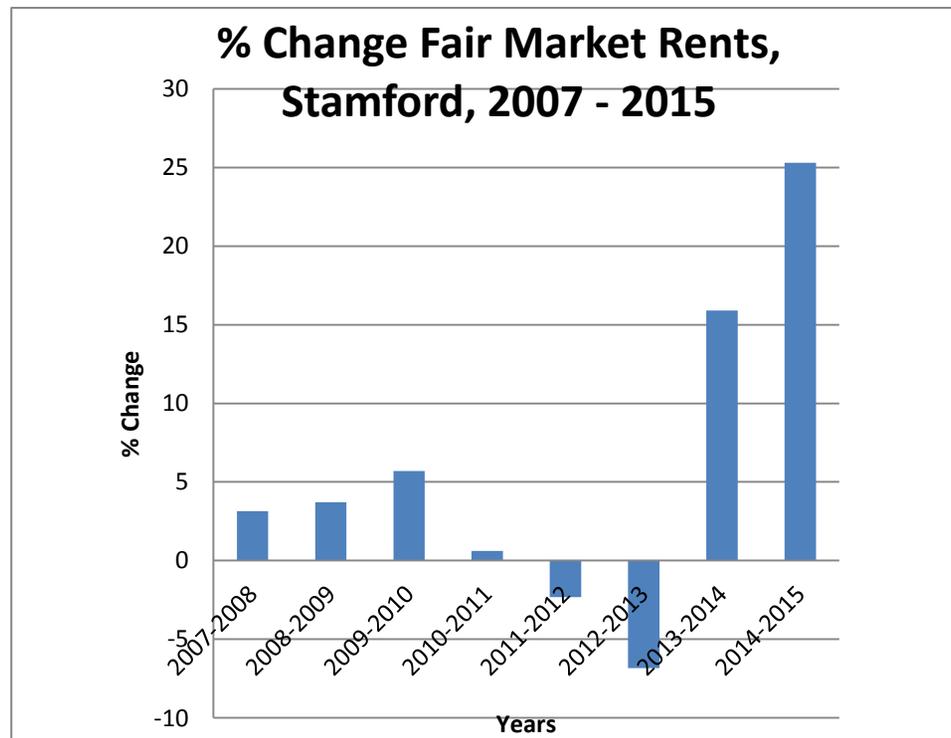
Data Source: HUD FMR and HOME Rents

Is there sufficient housing for households at all income levels?

The Housing Affordability chart above indicates a total of 7,415 units with rents affordable to households earning 0 – 50% of median income. However, data from our needs section above shows that there are just over 15,000 households earning 0 – 50% AMI seeking such units. Clearly, there is insufficient affordable units available for these households. This data also does not address “match” between housing type and unit availability, which is touched upon in the discussion above on need.

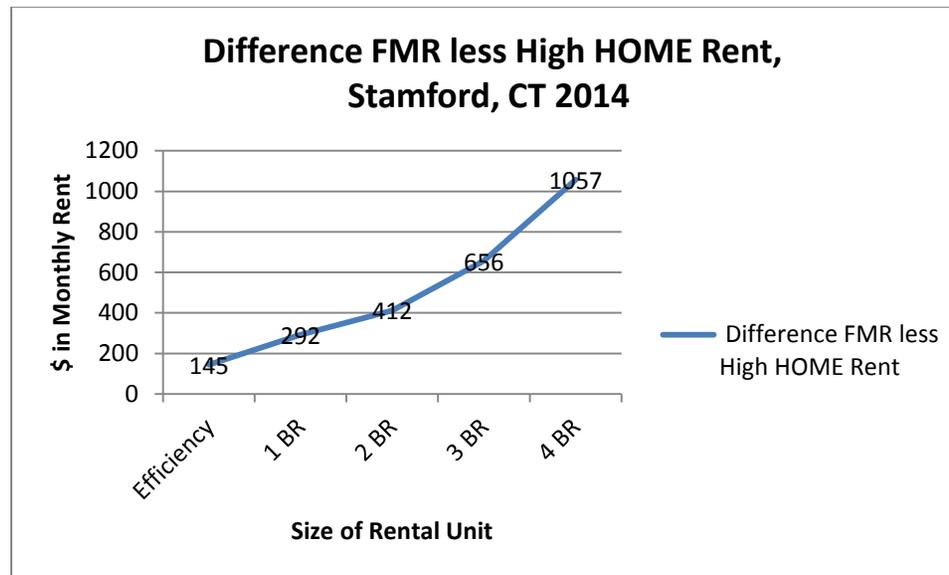
How is affordability of housing likely to change considering changes to home values and/or rents?

Stamford house values and rents had only evidenced modest increases during the period immediately after the housing bust of 2008. However, a comparison of fair market rents 2007 – 2015 shows considerable upward trending of rents:



How do HOME rents / Fair Market Rent compare to Area Median Rent? How might this impact your strategy to produce or preserve affordable housing?

HOME rents are significantly less than the fair market rents for Stamford. The chart below shows that as bedroom size increases, the gap between rents becomes greater. However, even the 2 bedroom difference is enough to deter private owners from using the HOME funds. Projects already using low income housing tax credits can best “afford” to use HOME funds.



Discussion

The rental market trend indicated by the FMR rates shows more pressure on unit supply 2014 – 2015. This has occurred despite the construction of nearly 2000 new rental units in the City’s South End as part of the BLT redevelopment project, where final build out will total 4000 units. These do not replace existing units; all are newly constructed on former industrial land, or are in converted industrial structures. As these units then present a net gain in housing stock, it is safe to conclude that there is a lot of population relocation into Stamford, which is adding to the pressure on standard code compliant housing stock.

The gap between HOME rents and fair market rents indicates that it is difficult to entice private rental housing owners to utilize HOME funds – too much rent is sacrificed in a high cost construction market. As a result, most of successful HOME applicants are already in the affordable housing business: Inspirica, New Neighborhoods Inc., Metro Green.

MA-20 Housing Market Analysis: Condition of Housing – 91.210(a)

Introduction

Definitions

Condition of Units

Condition of Units	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
With one selected Condition	10,049	39%	9,458	48%
With two selected Conditions	251	1%	1,357	7%
With three selected Conditions	0	0%	42	0%
With four selected Conditions	16	0%	0	0%
No selected Conditions	15,319	60%	8,986	45%
Total	25,635	100%	19,843	100%

Table 32 - Condition of Units

Data Source: 2007-2011 ACS

Year Unit Built

Year Unit Built	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
2000 or later	1,114	4%	2,029	10%
1980-1999	4,601	18%	5,695	29%
1950-1979	13,541	53%	8,178	41%
Before 1950	6,379	25%	3,941	20%
Total	25,635	100%	19,843	100%

Table 33 – Year Unit Built

Data Source: 2007-2011 CHAS

Risk of Lead-Based Paint Hazard

Risk of Lead-Based Paint Hazard	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
Total Number of Units Built Before 1980	19,920	78%	12,119	61%
Housing Units build before 1980 with children present	865	3%	1,665	8%

Table 34 – Risk of Lead-Based Paint

Data Source: 2007-2011 ACS (Total Units) 2007-2011 CHAS (Units with Children present)

Vacant Units

	Suitable for Rehabilitation	Not Suitable for Rehabilitation***	Total
Vacant Units			
Abandoned Vacant Units	16*		16
REO Properties	87**		87
Abandoned REO Properties			

Table 35 - Vacant Units

Need for Owner and Rental Rehabilitation

There is a need for rehabilitation of owner and rental units. Table 32 shows that 39% of Owner units report at least one of the severe housing problems' items. For rentals, 48% report at least one, and another 7 % have two of the problems experienced by those with "severe" housing problems.

Estimated Number of Housing Units Occupied by Low or Moderate Income Families with LBP Hazards

The oldest rental housing stock exists in the oldest, established parts of the City, in the same tracts that meet the criteria for inclusion in a CDBG target area, that is, 51% are low or moderate income as per the Department of Housing and Urban Development. So, it is safe to say that at minimum, 51% of the rental housing stock built before 1979 is occupied by low moderate income.

Discussion

Rehabilitation of rental units occupied by low moderate income is very difficult given the lack of adequate rental subsidy required to retire debt and return profit to private developers. Unless low interest funds are provided by other agencies (for example, state low income housing tax credit dollars, or Federal Home Loan Bank funds) rents will remain a severe problem for the families involved. In addition, assistance to owners under the HOME program is very difficult because of the capped house value of the HOME program. The limits provided are simply not consistent with the value of housing in the Stamford community. For example, the current one family limit of \$309,000 will limit program participants to those who live in low end condominiums (which often have a wealth of problems that must be addressed, including issues with major building systems.) This limit also makes it impossible to assist lower income elderly who live in homes of modest value – by Stamford measure, of up to \$450,000. The Trulia housing report for Stamford for January, 2015 relates the following: “Average price per square foot for Stamford CT was \$279, an increase of 9% compared to the same period last year. The median sales price for homes in Stamford CT for Oct 14 to Jan 15 was \$460,000 based on 169 home sales. Compared to the same period one year ago, the median home sales price increased 7.9%, or \$33,500, and the number of home sales decreased 28.1%. There are currently 588 resale and new homes in Stamford on Trulia, including 2 open houses, as well as 87 homes in the pre-foreclosure, auction, or bank-owned stages of the foreclosure process. The average listing price for homes for sale in Stamford CT was \$747,999 for the week ending Jan 28, which represents an increase of 1.9%, or \$13,651, compared to the prior week. Popular neighborhoods in Stamford include Springdale - Glenbrook - Belltown and Newfield - Westover - Turn of River, with average listing prices of \$390,297 and \$644,716.” (Stamford Connecticut Real Estate Overview, Trulia.com, 2/9/15)

MA-25 Public and Assisted Housing – 91.210(b)

Introduction

Totals Number of Units

	Program Type								
	Certificate	Mod-Rehab	Public Housing	Vouchers					
				Total	Project - based	Tenant - based	Special Purpose Voucher		
							Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
# of units vouchers available	0	54	503	1,408	32	1,376	0	0	0
# of accessible units									

*includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition

Table 36 – Total Number of Units by Program Type

Data Source: PIC (PIH Information Center)

Describe the supply of public housing developments:

The Housing Authority of the City of Stamford, doing business as Charter Oak Communities, has accomplished HOPE VI redevelopment of its Southfield Village project (now Southwood, Project Based Section 8 and market rate), and similar redevelopment of its Fairgate Commons project (remaining public housing units = ____.) In doing so, two new neighborhoods have been created housing a mix of incomes. It has overseen similar redevelopment of the state created Vidal Court housing (___remaining public housing units.) In doing these units, it has acknowledged the needs of special populations, and created Post House, a ___ unit structure for permanent supportive housing. Also, Taylor Street (___units public housing) For details on these new mixed income developments see the Charter Oak site

<http://www.charteroakcommunities.org/branching-out/>

Several major aging public housing type developments remain. Czescik, Ursula Park, Stamford Manor, Oak Park and Lawn Hill.

These benefit from annual allocation of capital funds as seen at the Charter Oak web site:

[Capital Projects | Charter Oak Communities](#)

In total, Charter Oak now manages 25 waiting lists including public housing, LIHTC, state funded housing, and Project Based Section 8 (<http://www.charteroakcommunities.org/residential-living/leasing-office/waiting-lists/>).

Describe the number and physical condition of public housing units in the jurisdiction, including those that are participating in an approved Public Housing Agency Plan:

As noted above, the public housing units remaining in Stamford have been redeveloped, or are targeted for major work/replacement. For example, Czescik Homes (___ units), located in the floodplain, will be relocated to Summer Street in a newly constructed building, which is utilizing CDBG-DR funds. Some HOME money and City capital funds are also involved.

In addition to the units owned and/or managed by Charter Oak, there are assisted units for elderly or disabled (Section 202 or 811) which operate with significant HUD based rental subsidies. These include:

Stamford Cross Road Residences - 24

Harboursite - 76

Willard - 53

Belltown - 27

Bayview Towers –

Stamford Green - 90 units

Two non-profits also own/manage large subsidized apartment projects. New Neighborhoods, Inc., has as its flagship Martin Luther King housing, which provides 80 units to low-moderate income. Also in New Neighborhoods' inventory: Fairfield Commons (19 supportive units) and Parkside Gables (69 units.) New Neighborhoods and Mutual Housing of Southwestern Connecticut (MHA) were both involved in total renovations/refinance of Friendship Apartment (121 units) to keep these units as affordable rental units. MHA also manages Trinity apartments (48 units.) NNI manages Marshall Commons (50 units,) Madison Smith apartments (10 units) Stillwater Heights (15 units,) the Atlantic (27 elderly units) and 53 Clinton (1 unit.)

Public Housing Condition

Public Housing Development	Average Inspection Score

Table 37 - Public Housing Condition

The Charter Oaks web site reports: “Achieved and consistently maintained excellent scores in HUD inspections and multiple rating systems.” (Charter Oak Website, Recent Accomplishments & Initiatives, 2/18/2015)

Describe the restoration and revitalization needs of public housing units in the jurisdiction:

Only 3 major developments remain that have not received major renovations. They are: Ursula Park Townhomes (32 units, built 1986); Lawn Hill (Townhouses – 20 units, Terrace – 206 units, built 1973); and Oak Park (168 units built 1986.) All need significant investment for restoration and energy efficiency. Note, the elderly complex Stamford Manor (the Manor with 155 units built in 1966 and the Extension with 60 units built in 1974) has recently received over \$2.7 million in elevator, roof and masonry upgrades. Ursula Park is scheduled for window and siding replacement.

Describe the public housing agency's strategy for improving the living environment of low- and moderate-income families residing in public housing:

The PHA has singled out increased employment and income growth for tenants as critical to improving the lives of their tenants. The Authority encourages tenants to participate in a housing self-sufficiency program and to focus on household based economic development. In addition, the Authority has embarked on creating a Vita “healthy neighborhood” model with the local hospital for the Stillwater West End neighborhood. This has resulted in grass roots neighborhood plans and investment in health friendly local land uses (e.g., an in City “farm”.) There will also be store front access to health care providers.

Discussion: Charter Oaks has been a major influence in neighborhood revitalization by transforming aging, threatening housing complexes into attractive housing with tenant involvement in upgrades and/or replacement. They have established a successful mixed income model that has been used to create Fairgate, and replacement communities for Vidal Court.

MA-30 Homeless Facilities and Services – 91.210(c)

Introduction

Facilities and Housing Targeted to Homeless Households

	Emergency Shelter Beds		Transitional Housing Beds	Permanent Supportive Housing Beds	
	Year Round Beds (Current & New)	Voucher / Seasonal / Overflow Beds	Current & New	Current & New	Under Development
Households with Adult(s) and Child(ren)	36		63	17	
Households with Only Adults	107		26	146	14*
Chronically Homeless Households				35	
Veterans					
Unaccompanied Youth					

Table 38 - Facilities and Housing Targeted to Homeless Households

*Project Lighthouse, 2 units for veterans, and 2 for chronically homeless.

Describe mainstream services, such as health, mental health, and employment services to the extent those services are used to complement services targeted to homeless persons.

Homeless shelters routinely work to assure that their clients are signed up for income support programs (U.S. Social Security and SSDI and medical (Medicare, State Husky). State HUSKY, for example, qualifies clients for services including:

- Preventive Care
- Doctor Visits
- Women's Health Care
- Family Planning Services
- Maternity Care
- Hospital Stays
- Physical Therapy/Occupational Therapy/Speech Therapy
- Audiology Services
- Physical Rehabilitation
- Dialysis
- Durable Medical Equipment
- Hearing Aids
- Orthotic and Prosthetic Devices
- Home Health Care
- Hospice Services
- Ambulatory Surgery
- Hospital Outpatient Care
- Laboratory Tests
- X-rays and other Radiology Services
- Vision Care
- Emergency Care
- Dental Services (through CT Dental Health Partnership)
- Behavioral Health Services (through CT Behavioral Health Partnership)
- Pharmacy (medications)

The shelters work with WorkPlace, an agency that does workforce development for employers in the region. It also supplies a special Support Services for Veteran Families (SSVF). The New Haven Shelter is a partner in this program, providing office space for SSVF staff.

List and describe services and facilities that meet the needs of homeless persons, particularly chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth. If the services and facilities are listed on screen SP-40 Institutional Delivery Structure or screen MA-35 Special Needs Facilities and Services, describe how these facilities and services specifically address the needs of these populations.

MA-35 Special Needs Facilities and Services – 91.210(d)

Introduction

A review of the agencies that provide supportive services to special needs populations indicates three areas of specialization:

- Elderly/Frail Elderly & Persons With Disabilities
- Addictions, HIV/Aids
- Public Housing Tenants

Including the elderly, frail elderly, persons with disabilities (mental, physical, developmental), persons with alcohol or other drug addictions, persons with HIV/AIDS and their families, public housing residents and any other categories the jurisdiction may specify, and describe their supportive housing needs

Elderly, Frail Elderly, Persons With Disabilities

These groups require in-home wellness visits, and a referral to a network of health providers. They also require supplemental food programs, as their incomes are devastated by medical costs.

Addictions, HIV/Aids

Those with addictions need supervised rehabilitation alternatives, and psychological counseling. Those with HIV/Aids need special housing where they can receive specialized support for emotional and physical challenges. Those in homes need to receive assistance in meeting their required medical treatment goals.

Public Housing Tenants

Tenants with limited incomes receive counseling regarding work skills and options, so their ability to contribute to their housing costs is increased. There are special tenants who also require other types of support, including medical supervision and psychological assistance.

Describe programs for ensuring that persons returning from mental and physical health institutions receive appropriate supportive housing

The Connecticut State Agency Department of Mental Health and Addiction Services has an agreement with Inspirica, to provide 3 units for individuals who are somehow working their way through and/or out of the criminal justice system, and who have mental health issues. Inspirica provides supportive services to those referred for these units.

Inspirica and the Shelter for the Homeless operate supportive housing. They refer clients to Optimus (healthcare services), Dubois (mental health), Liberation Programs (substance abuse),

CT Renaissance (substance abuse), Kids in Crisis (unaccompanied youth) and the Child Guidance Center (psychological.)

They also provide workforce/job readiness training and refer clients for in-depth training to The Workplace. This is done to assure that a client of supportive housing can increase control of his/her life and contribute to their housing needs.

Specify the activities that the jurisdiction plans to undertake during the next year to address the housing and supportive services needs identified in accordance with 91.215(e) with respect to persons who are not homeless but have other special needs. Link to one-year goals. 91.315(e)

For entitlement/consortia grantees: Specify the activities that the jurisdiction plans to undertake during the next year to address the housing and supportive services needs identified in accordance with 91.215(e) with respect to persons who are not homeless but have other special needs. Link to one-year goals. (91.220(2))

The City will be completing activities funded in Year 40 that provide services to those with special needs. These activities include mental health services for children, (Kids In Crisis, Inc., and Child Guidance Center of Southern Connecticut, Inc.) The Domestic violence Crisis Center provides emergency housing, but also counsels those who live in dangerous situations regarding approaches to take to a safe, sane existence. The Sexual Assault Crisis and Education Center, Inc., counsels those who are likely vulnerable to sexual exploitation. Sickle Cell disease Association provides information on coping to those who have this disease. The Food Bank provides supplies that often relieves budget stress for a family, permitting them to meet high housing costs in the face of shrinking income and increasing medical costs. Child Care Learning Centers provides sliding scale child care, again assisting families stressed for funds to attend work. Liberation Programs provides in house drug/addiction treatment. In year 42, the activities to be supported will be more limited because of cuts in funding. These include:

On the City side, support is in place for a senior center and meal plan which is used by the elderly facing inability to prepare their own foods, or lacking income to purchase necessary food supplies.

MA-40 Barriers to Affordable Housing – 91.210(e)

Negative Effects of Public Policies on Affordable Housing and Residential Investment

The greatest barrier to Stamford's housing being affordable is the local economy – it is economically reasonably healthy, but high cost location to live. As shown in the housing market analysis, low income housing ownership opportunities are very limited. This leaves rental housing opportunities, which are inadequate at rent levels affordable to low moderate income. There is development pressure on the housing rental market, and rents remain high, despite increased rental opportunities. Public policy at the federal and state level can be a barrier in Stamford. As it is such a high income area, programs offered are often unwilling to provide the level of subsidy necessary to lower a market rent to an “affordable” one. The federal limit on the HOME maximum permitted house value is another example of a number that ignores the market.

Public policy at the local level has provided incentive or often required development of below market rate units as part of new projects. However, even below market rate units' rents are not felt to be adequate by many; there is a call in the community for deep subsidy rentals. The previous supplier of such units, The Housing Authority of the City of Stamford, now known as Charter Oak Communities (COC), characterizes it's evolution as changing the way residents, neighbors and the community view it's developments explained Courtney Nelthropp, chairman, COC Board of Commissioners. “We have evolved from being providers and managers of low-cost public housing to being in the business of building communities.” (April, 2009, COC Press release.) The COC structures developments to be mixed income so that each can sustain itself, generating enough income to pay for development costs and continued maintenance and tenant services. As funding sources change, some developments have units of deeper subsidy. Right now, however, this is done to assure that deep subsidy units are replacing existing deep subsidy units (most projects are extended redevelopment of existing, outdated facilities.) The Authority – COC has excelled at making its new, replacement developments neighborhood assets. It has tackled the necessity to rehouse many difficult tenants with disabilities in a facility of supportive housing units, providing on site counseling and life skill/management services in cooperation with the local Family Centers non-profit. These are deep subsidy units.

Similarly, other providers of deep subsidy units are those leading the charge in housing the homeless. Many of the homeless can be characterized as requiring some form of supportive housing. Rehabilitated living facilities are being developed by the Shelter for the Homeless and by Inspirica. These developments provide supportive services. Much of this activity depends on continued funding of the now popular homeless housing programs.

State and Federal funds are now subject to public policy that harnesses most sources of housing development funding for the homeless. As noted above, the homeless community is one that appears to have its own path of occupation, up and down the I-95 corridor. Many work. The need of this population is great, and should be addressed. However, there may remain a feeling in the Stamford community as a whole that there are fewer units for working, non-pathological, extremely low income folk. Analysis in the housing market section above shows that many very low income people are paying

greater than 50% of income for rent - an amount few families can sustain. One homeless housing provider, Inspirica, has faced this issue, and In response to this, has assumed self subsidy of several units which house those homeless because of economics – they work, but cannot find a unit they can afford to rent.

In all, there needs to be discussion on what is ‘affordable’, and ‘fit’ for development with City programs. CDBG and HOME funds are tied to benefitting those earning less than 50% of median income. Given the cut back in funding for both of these programs, they are now best used with other sources of subsidized funds – which means developments receiving funds for homeless transitional or supportive housing, or the few developments successfully using Low Income Housing Tax Credits.

MA-45 Non-Housing Community Development Assets – 91.215 (f)

Introduction

Economic Development Market Analysis

Business Activity

Business by Sector	Number of Workers	Number of Jobs	Share of Workers %	Share of Jobs %	Jobs less workers %
Agriculture, Mining, Oil & Gas Extraction	53	20	0	0	0
Arts, Entertainment, Accommodations	4,807	5,231	10	8	-2
Construction	1,354	1,824	3	3	0
Education and Health Care Services	8,721	9,231	18	14	-4
Finance, Insurance, and Real Estate	7,605	12,657	15	19	4
Information	1,856	2,562	4	4	0
Manufacturing	2,131	3,229	4	5	1
Other Services	2,600	2,139	5	3	-2
Professional, Scientific, Management Services	7,104	12,365	14	19	4
Public Administration	0	0	0	0	0
Retail Trade	5,687	5,392	12	8	-3
Transportation and Warehousing	1,199	1,730	2	3	0
Wholesale Trade	2,147	2,998	4	5	0
Total	45,264	59,378	--	--	--

Table 39 - Business Activity

Data Source: 2007-2011 ACS (Workers), 2011 Longitudinal Employer-Household Dynamics (Jobs)

Labor Force

Total Population in the Civilian Labor Force	71,562
Civilian Employed Population 16 years and over	64,592
Unemployment Rate	9.74
Unemployment Rate for Ages 16-24	33.71
Unemployment Rate for Ages 25-65	7.16

Table 40 - Labor Force

Data Source: 2007-2011 ACS

Occupations by Sector	Number of People
Management, business and financial	19,171
Farming, fisheries and forestry occupations	2,187
Service	7,333
Sales and office	14,462
Construction, extraction, maintenance and repair	5,517
Production, transportation and material moving	2,165

Table 41 – Occupations by Sector

Data Source: 2007-2011 ACS

Travel Time

Travel Time	Number	Percentage
< 30 Minutes	43,769	72%
30-59 Minutes	10,210	17%
60 or More Minutes	6,517	11%
Total	60,496	100%

Table 42 - Travel Time

Data Source: 2007-2011 ACS

Education:

Educational Attainment by Employment Status (Population 16 and Older)

Educational Attainment	In Labor Force		Not in Labor Force
	Civilian Employed	Unemployed	
Less than high school graduate	6,076	1,042	1,850
High school graduate (includes equivalency)	10,887	1,200	2,754
Some college or Associate's degree	10,792	1,271	2,053

Educational Attainment	In Labor Force		Not in Labor Force
	Civilian Employed	Unemployed	
Bachelor's degree or higher	27,008	1,537	4,016

Table 43 - Educational Attainment by Employment Status

Data Source: 2007-2011 ACS

Educational Attainment by Age

	Age				
	18–24 yrs	25–34 yrs	35–44 yrs	45–65 yrs	65+ yrs
Less than 9th grade	1,189	2,093	1,453	1,786	1,769
9th to 12th grade, no diploma	856	1,050	762	1,824	1,423
High school graduate, GED, or alternative	2,614	4,180	3,768	6,893	4,325
Some college, no degree	3,029	2,876	2,610	4,375	1,875
Associate's degree	258	1,005	1,200	2,050	514
Bachelor's degree	1,598	7,025	4,778	6,669	2,459
Graduate or professional degree	195	3,706	4,200	6,183	2,455

Table 44 - Educational Attainment by Age

Data Source: 2007-2011 ACS

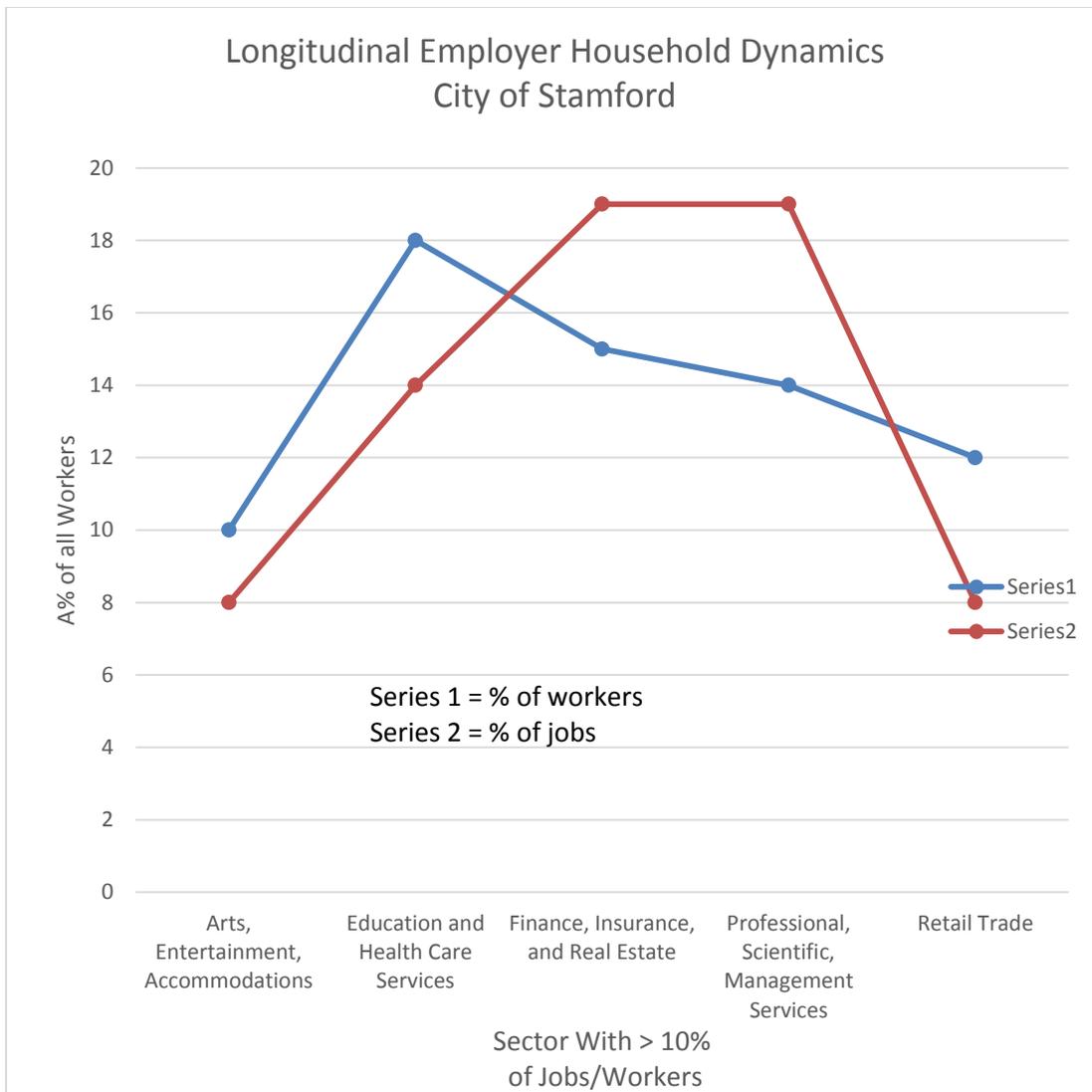
Educational Attainment – Median Earnings in the Past 12 Months

Educational Attainment	Median Earnings in the Past 12 Months
Less than high school graduate	18,495
High school graduate (includes equivalency)	26,693
Some college or Associate's degree	40,116
Bachelor's degree	62,249
Graduate or professional degree	86,688

Table 45 – Median Earnings in the Past 12 Months

Data Source: 2007-2011 ACS

Based on the Business Activity table above, what are the major employment sectors within your jurisdiction? See chart below.



Source: 2007-2011 ACS, Workers

Describe the workforce and infrastructure needs of the business community:

Stamford’s largest employment sectors are Arts and Accommodations, Education and Health Care, Finance, and Professional/Management. Workforce required is well educated, or with at least 2 year training in hospitality/hotel management, or health care assistant. Special skills for institutional/hospitality industries would include dietician, chef, diagnostic test technicians.

Describe any major changes that may have an economic impact, such as planned local or regional public or private sector investments or initiatives that have affected or may affect

job and business growth opportunities during the planning period. Describe any needs for workforce development, business support or infrastructure these changes may create.

There has been downsizing at UBS and RBS, which now feel over invested in physical plant. However, finance sector remains strong.

How do the skills and education of the current workforce correspond to employment opportunities in the jurisdiction?

Arts, education and health appear to have more workers available than there are jobs. This will shift, at least in the health field, when the local hospital opens a larger facility (now under construction) and the Vita community concept takes hold.

Describe any current workforce training initiatives, including those supported by Workforce Investment Boards, community colleges and other organizations. Describe how these efforts will support the jurisdiction's Consolidated Plan.

Workforce training initiatives include those operated by The Workplace, which is excellent at helping those who have been without employment for a period of time regain a work position. These programs are instrumental at helping those who are homeless or on the verge of homelessness as unemployment supports have run out. UCONN Stamford supports several Masters programs which are useful in the finance and management sectors.

Does your jurisdiction participate in a Comprehensive Economic Development Strategy (CEDS)?

No.

If so, what economic development initiatives are you undertaking that may be coordinated with the Consolidated Plan? If not, describe other local/regional plans or initiatives that impact economic growth.

Discussion

The local Master Plan has evolved against a backdrop of regional planning fostered by the South Western Regional Planning Agency (SWRPA). Most notably, is the New York State and Connecticut cooperative Sustainable Communities Planning Program. This looks at transportation through the region in an attempt to upgrade the exchange of workers and goods. It emphasizes upgrade of several major transportation nodes, emphasizing commuter train service.

Local developers of housing are now also looking to transportation oriented development. Private ventures into this area - for example, the BLT housing development in Stamford's South End – indicate

that those who commute to work are anxious to obtain quality housing adjacent to an easy public train commute. This emphasizes the need to plan for a fluid population along the I-95 corridor.

MA-50 Needs and Market Analysis Discussion

Are there areas where households with multiple housing problems are concentrated? (include a definition of "concentration")

Are there any areas in the jurisdiction where racial or ethnic minorities or low-income families are concentrated? (include a definition of "concentration")

What are the characteristics of the market in these areas/neighborhoods?

Are there any community assets in these areas/neighborhoods?

Are there other strategic opportunities in any of these areas?

Administrative experience with CDBG programs indicate that the CDBG qualifying census tracts contain significant number of households with multiple housing problems, for example, combination at least two of the problems listed in the CHAS data in the earlier section of this document. The map graphic shows that 21 to 50 per cent of extremely low income households in our targeted areas are experiencing one of four severe housing problems.

As noted above, the low income CDBG eligible census tracts are racially diverse, even though there are concentrations of minority households. In Stamford's case, any tract with over 50% minority households is considered one with a concentration of minority population. Seven of the tracts have over 50% not white and Hispanic households, (some ranging to 80%+). The remaining four are over 40% not white and Hispanic. Because of the near transit and downtown nature of these tracts, the market for housing remains strong, especially if the development provides mixed income rental options. Community assets in these areas include local park development (Mill River Park), transit hubs, hospital and growing Vita community, zoning that requires linkage or below market rate unit development, a very "alive" downtown, and neighborhood reinvestment (for example, the large closed Clairol production facility has become part new school, and part site of the Chelsea Piers sports and entertainment complex. The site is also home to NBC Sports.)

Train stations in the Glenbrook and Springdale neighborhoods provide incentive for additional "commuter" development to renew aging housing stock in those areas.

Strategic Plan

SP-05 Overview

Strategic Plan Overview

The City's strategic plan emphasizes addressing housing needs and larger community development needs that impact quality of neighborhood life in the CDBG qualifying census tracts. Analysis of housing need and relevant population data indicates that Stamford has a core of census tracts that can attract reinvestment of private funds, if they continue to be perceived as having a strong sense of neighborhood and as linked to a vital downtown. The neighborhoods must have community facilities that serve the residents, and there must be resources to meet needs of those aging in place as well as the young who are attracted to new rental opportunities and a quick commute to jobs up and down the I-95 corridor. Given development pressures and continued high property values in Stamford, those with limited incomes need opportunities to live in quality housing without paying over 35% of their income for housing. The engine of private rental housing/development has been harnessed to assist creation of quality affordable housing choices through the City's Below Market Rate zoning and Linkage ordinances. However, additional deep subsidy rentals must be created.

Stamford must also remain diligent in assisting its 'subcommunities' to achieve integration into the larger community. Social/bi lingual services need to be offered to assist Stamford's immigrant communities achieve a safe, stable existence. Supportive housing for homeless individuals and families must be offered in the context of a regional approach to a population that appears to move up and down the I-95 corridor.

SP-10 Geographic Priorities – 91.215 (a)(1)

Geographic Area

Table 46 - Geographic Priority Areas

General Allocation Priorities

Describe the basis for allocating investments geographically within the jurisdiction (or within the EMSA for HOPWA)

As per the Community Development Block Grant program requirements, priority for funding of activities goes to those that directly serve our low-moderate income, and/or benefit the census tracts in which they are concentrated. As CDBG funds continue to dwindle, these tracts will remain as in previous years to maximize impact of continued investments: 201, 214, 215, , 217, 218.02, 220, 220, 221, 222, and 223. Exact location of CDBG funded activities are determined through the CDBG budget development process, in which providers of services/housing/community development activities bring their projects to the City requesting funding.

The City does not receive HOPWA funds.

SP-25 Priority Needs - 91.215(a)(2)

Priority Needs

Table 47 – Priority Needs Summary

Need	Priority	Comment
Housing, Very Low Income	First	Create/restore units that benefit eligible population most negatively affected by high housing related costs
Housing, Moderate Income	Second	Assist homebuyers to settle into target areas
Public Services for Very Low Income	First	Because of limited resources, direct support services/subsidies to those who reach the very poor, e.g., food pantries....
Public Improvements	Second	Because of limited resources carefully target investment in neighborhood to assure continued services to most vulnerable populations
Economic Development	Second	Strengthen neighborhoods' sense of place and economic identity. Attempt to create microbusinesses and/or jobs in existing businesses. Because funds are limited, rely on non CDBG funds to greatest extent possible.

Narrative (Optional)

SP-30 Influence of Market Conditions – 91.215 (b)

Influence of Market Conditions

Affordable Housing Type	Market Characteristics that will influence the use of funds available for housing type
Tenant Based Rental Assistance (TBRA)	No funds have been available except to Housing Authority
TBRA for Non-Homeless Special Needs	No funds have been available except to Housing Authority
New Unit Production	Successful LIHTC financing options
Rehabilitation	High land and rehab costs requires project based Section 8 rents stat regular lower HOME rents to assure project feasibility
Acquisition, including preservation	Due to high costs of property, no acquisition will occur. Funds are too limited.

Table 48 – Influence of Market Conditions

SP-35 Anticipated Resources - 91.215(a)(4), 91.220(c)(1,2)

Introduction

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	DHUD	Per Regulation	864,525			864,525	3,200,000	For public services, housing, economic development, public improvements, housing and administration
HOME	DHUD	Per Regulations	352,393			352,393	1,200,000	For housing development, rehabilitation, down payment assistance, and administration
HTF	DHUD via State of CT	Per Regulations	800,000 (estimate)			800,000	3,200,000 (estimate)	80% for extremely low income/deep subsidy rental unit creation, admin.

Table 49 - Anticipated Resources

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

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

Discussion

The only matching funds required for the DHUD funds requested are for the HOME Investment Partnerships Program. The City has always exceeded the annual required match for these funds. Any additional match required under this Plan will be provided through City capital budget funds. The City budget sets aside \$500,000 annually for housing related purposes.

The City will attempt to leverage funds with its CDBG and HOME investments. HOME regulations have been revised such that more projects may be entirely HOME funded. This is because regulations now require all other project funds to be in place at the time of HOME commitment. This timing is difficult to assure with larger projects progressing through state funding rounds for LIHTC and CHAMP monies.

HTF funds must be used to create deep subsidy rental units. It is unlikely that the sums available will work without injection of other subsidies into a project. The City will monitor the State of Connecticut program in an effort to obtain a fair share of funds awarded to the state by DHUD. Other State funds will probably have to be combined into any HTF project to assure project feasibility.

SP-40 Institutional Delivery Structure – 91.215(k)

Explain the institutional structure through which the jurisdiction will carry out its consolidated plan including private industry, non-profit organizations, and public institutions.

Responsible Entity	Responsible Entity Type	Role	Geographic Area Served

Table 50 - Institutional Delivery Structure

Assess of Strengths and Gaps in the Institutional Delivery System

Availability of services targeted to homeless persons and persons with HIV and mainstream services

Homelessness Prevention Services	Available in the Community	Targeted to Homeless	Targeted to People with HIV
Homelessness Prevention Services			
Counseling/Advocacy	Yes	Yes	Yes
Legal Assistance	Yes	No	No
Mortgage Assistance	No	No	No
Rental Assistance	Yes	Some	Some
Utilities Assistance	Rapid Rehousing	Yes	Some
Street Outreach Services			
Law Enforcement	No	No	No
Mobile Clinics	Yes	Yes	Yes
Other Street Outreach Services	No	No	No
Supportive Services			
Alcohol & Drug Abuse	Yes	Yes	Yes
Child Care	Yes	Some	No
Education	Yes	Yes	No
Employment and Employment Training	Yes	Yes	Yes
Healthcare	Yes	Yes	Yes
HIV/AIDS	Yes	Some	Yes
Life Skills	Yes	Yes	Some
Mental Health Counseling	Yes	Yes	Some
Transportation	Yes	No	No
Other			
Other			

Table 51 - Homeless Prevention Services Summary

Describe how the service delivery system including, but not limited to, the services listed above meet the needs of homeless persons (particularly chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth)

Describe the strengths and gaps of the service delivery system for special needs population and persons experiencing homelessness, including, but not limited to, the services listed above

Provide a summary of the strategy for overcoming gaps in the institutional structure and service delivery system for carrying out a strategy to address priority needs

SP-45 Goals Summary – 91.215(a)(4)

Goals Summary Information

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator

Table 52 – Goals Summary

Goal Descriptions

Estimate the number of extremely low-income, low-income, and moderate-income families to whom the jurisdiction will provide affordable housing as defined by HOME 91.315(b)(2)

SP-50 Public Housing Accessibility and Involvement – 91.215(c)

Need to Increase the Number of Accessible Units (if Required by a Section 504 Voluntary Compliance Agreement)

Activities to Increase Resident Involvements

Is the public housing agency designated as troubled under 24 CFR part 902?

Plan to remove the ‘troubled’ designation

The Housing Authority of the City of Stamford, operating as Charter Oak Communities, is not a troubled authority.

Charter Oak has developed a model for increased resident involvement based upon its experience in redevelopment of its aging housing stock into mixed income developments. For those developments remaining as “Authority” developments, resident councils have also been established.

SP-55 Barriers to affordable housing – 91.215(h)

Barriers to Affordable Housing

Strategy to Remove or Ameliorate the Barriers to Affordable Housing

Barriers noted in section MA 40 included a healthy, pressurized housing market, and programs for creation of affordable units that are hamstrung by regulations that put artificial caps on incomes (relative to local median income) rents, and housing values. Additional resources are being made available for deep subsidy rental units, but most are linked to creation of specialized supportive housing for the homeless.

The needs analysis indicates a need for deep subsidy rental units, as well as assistance to low income elderly homeowners. In a high cost housing market, it is difficult to deliver assistance to either renters or owners when faced with a dwindling federal commitment to housing and community development. The State of Connecticut has made a commitment to affordable housing, but this commitment now is overshadowed by the need for transportation improvements – lack of a decent transportation system is strangling the state economy.

The City will continue to assist the development of quality affordable housing through its Below Market Rate and Linkage programs. As local finances permit, capital funds will be committed for new project development. The City will work closely with developers to provide these resources, supplemented by CDBG or HOME funds. The developers most likely to be successful are those who utilize available LIHTC or state affordable housing programs. As feasible, the City will seek its share of Housing Trust Funds from the State of Connecticut.

Access

In single family home ownership, a proportionality analysis of 2013 HMDA data for the Bridgeport-Stamford-Norwalk MSA indicated that the percent of total loan originations of white non Hispanic versus other races/ethnicities is somewhat disproportional to applications from these groups, but loan denials are disproportionate to both application levels and loan originations. For example, originations from other races compose 31% of all denials, while only composing 27% of all originations. Although the CRA data does not provide information showing the relationship of race to income, the difference in proportion in this instance makes racial factors and fund access an issue. This data is for the Metropolitan Statistical Area, but there is no reason to believe that Stamford underwriters do not contribute to the disproportionate figures. Stamford's down payment program reaches out to those communities most impacted by these patterns. It is available to applicants who receive home buyer training, and who are tracked through the application/purchasing/financing process by housing counselors who can assure fairness of treatment. In combination with units created through the inclusionary and linkage programs, the City has developed a means of increasing opportunities for those parts of the population that may otherwise be impacted by discriminatory practices. Unfortunately,

revised HUD approved existing housing unit values and income levels often mitigate against use of the down payment program.

SP-60 Homelessness Strategy – 91.215(d)

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

Addressing the emergency and transitional housing needs of homeless persons

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.

Help low-income individuals and families avoid becoming homeless, especially extremely low-income individuals and families who are likely to become homeless after being discharged from a publicly funded institution or system of care, or who are receiving assistance from public and private agencies that address housing, health, social services, employment, education or youth needs

The Stamford Greenwich Continuum of Care has morphed into Stamford Greenwich Opening Doors and is now on the verge of becoming part of Fairfield Opening Doors. This has been done in an effort to be consistent with federal and state declared priorities listed above for services to homeless and those at risk of homelessness. The City has supported this group with a continued presence on its steering committee, and close work in housing/shelter development with local member homeless shelter providers, the Shelter for the Homeless and Inspirica. HOME funds have been provided to three Inspirica renovations, and four Shelter for the Homeless supportive housing renovations/construction projects. The City is supportive of this group's efforts to create a single point of intake for its clients, which would be a tremendous help in assuring that the very vulnerable are protected from "falling through the cracks." The local HMIS system will be adapted to this use. Inspirica has a Rapid Re Housing program that attempts to help those at greatest risk of homelessness, and the group is committed to the concept of "housing first".

SP-65 Lead based paint Hazards – 91.215(i)

Actions to address LBP hazards and increase access to housing without LBP hazards

How are the actions listed above related to the extent of lead poisoning and hazards?

How are the actions listed above integrated into housing policies and procedures?

The City is cooperating with the LAMPP Program (Lead Action for Medicaid Primary Prevention), a statewide Lead Hazard Control fund source. Any work involving HOME, or CDBG funds receive lead hazard evaluations, and must comply with Section 1012 and 1013 regulations. Any unit inspected which has an EBL child must comply with Section 1012-1013 and the Stamford local lead ordinance in remediation.

SP-70 Anti-Poverty Strategy – 91.215(j)

Jurisdiction Goals, Programs and Policies for reducing the number of Poverty-Level Families

How are the Jurisdiction poverty reducing goals, programs, and policies coordinated with this affordable housing plan

The City's antipoverty strategy emphasizes assisting residents to achieve and sustain full economic independence through education and training programs designed to gain access to quality jobs. To this end, CDBG will expect Community Business Development Organizations to conduct activities benefitting their neighborhoods, including working with local businesses to find employees from within the neighborhoods. Unfortunately, jobs remain difficult to create in this economy. In an attempt to ameliorate the effects of poverty, the City has previously funded the food bank, a medicine prescription program for elderly and a mental health service for children. Still, CDBG and community resources are limited.

SP-80 Monitoring – 91.230

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

Expected Resources

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

Introduction

Anticipated Resources

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Reminder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		

Table 53 - 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

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

Discussion

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

Table 54 – Goals Summary

Goal Descriptions

Projects

AP-35 Projects – 91.220(d)

Introduction

Projects

#	Project Name

Table 55 – Project Information

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

AP-38 Project Summary
Project Summary Information

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

Geographic Distribution

Target Area	Percentage of Funds

Table 56 - Geographic Distribution

Rationale for the priorities for allocating investments geographically

Discussion

Affordable Housing

AP-55 Affordable Housing – 91.220(g)

Introduction

One Year Goals for the Number of Households to be Supported
Homeless
Non-Homeless
Special-Needs
Total

Table 57 - One Year Goals for Affordable Housing by Support Requirement

One Year Goals for the Number of Households Supported Through
Rental Assistance
The Production of New Units
Rehab of Existing Units
Acquisition of Existing Units
Total

Table 58 - One Year Goals for Affordable Housing by Support Type

Discussion

AP-60 Public Housing – 91.220(h)

Introduction

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

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

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

Discussion

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

Introduction

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

Addressing the emergency shelter and transitional housing needs of homeless persons

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

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

Discussion

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

Introduction:

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

Discussion:

AP-85 Other Actions – 91.220(k)

Introduction:

Actions planned to address obstacles to meeting underserved needs

Actions planned to foster and maintain affordable housing

Actions planned to reduce lead-based paint hazards

Actions planned to reduce the number of poverty-level families

Actions planned to develop institutional structure

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

Discussion:

Program Specific Requirements

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

Introduction:

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
 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
 3. The amount of surplus funds from urban renewal settlements
 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.
 5. The amount of income from float-funded activities
- Total Program Income

Other CDBG Requirements

1. The amount of urgent need activities

HOME Investment Partnership Program (HOME)

Reference 24 CFR 91.220(I)(2)

1. A description of other forms of investment being used beyond those identified in Section 92.205 is as follows:
2. A description of the guidelines that will be used for resale or recapture of HOME funds when used for homebuyer activities as required in 92.254, is as follows:
3. A description of the guidelines for resale or recapture that ensures the affordability of units acquired with HOME funds? See 24 CFR 92.254(a)(4) are as follows:
4. Plans for using HOME funds to refinance existing debt secured by multifamily housing that is rehabilitated with HOME funds along with a description of the refinancing guidelines required that will be used under 24 CFR 92.206(b), are as follows:

Discussion:

Appendix - Alternate/Local Data Sources