



TOWN OF CALAIS, EAST CALAIS GENERAL STORE

# State of Vermont Agency of Commerce and Community Development **DRAFT Consolidated Annual Performance Evaluation Report (CAPER)**

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# Contact Information

**From:**

Ann Karlene Kroll, Director of Federal Programs  
ACCD, Department of Housing and Community  
Development

[AnnKarlene.Kroll@vermont.gov](mailto:AnnKarlene.Kroll@vermont.gov), 802-828-5225

**To receive this information in an alternative format or  
for other accessibility requests, or any other  
questions please contact:**

Cindy Blondin, Grants Management Analyst  
ACCD, Department of Housing and Community  
Development

[Cindy.Blondin@vermont.gov](mailto:Cindy.Blondin@vermont.gov), 802-828-5219



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**Attachments: (Will be included with the final report to HUD)**

ESG SAGE Report

ESG CARES Cumulative Report

VCDP - PR28 IDIS Reports, FY23 & CDBG-CV Awards, FY23 & FY24 & CDBG-CV Allocations, Percentages of National Objectives

CAPER Newspaper Notice Tear Sheet



## CR-05 - Goals and Outcomes

### **Progress the jurisdiction has made in carrying out its strategic plan and its action plan. 91.520(a)**

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

### **Vermont's Action Plan established four goals to address the identified housing and community development priorities and they are:**

1. Increase the supply and quality of affordable housing.
2. Decrease the number of people experiencing homelessness.
3. Create and retain jobs.
4. Strengthen communities and improve the quality of life of Vermonters.

### **Vermont's outcomes achieved over the FY23 program year were:**

#### **Housing**

- 142 (108 CDBG & 27 HOME & 7 HTF) rental units constructed
  - 20 housing units for homelessness added
- 59 (38 CDBG & 12 HOME & 9 HTF) rental units rehabilitated
  - 7 housing units for homelessness added
- 97 owner occupied housing units rehabilitated

There are an additional 29 units of housing rehabbed with other resources, as the result of funding from HOME & HTF to projects.

#### **Homelessness**

- 712 households received tenant-based rental assistance and rapid rehousing assistance
- 3190 persons provided overnight shelter

#### **Jobs**

- 5 jobs being created/retained
- 1 businesses assisted

#### **Community Improvements**

- 5165 persons served by improved public facilities or infrastructure



- 964 households assisted by public services
- 0 acres of brownfields remediated
- 0 blighted building demolished

## **CDBG-CV**

### **Housing**

- 0 rental units rehabilitated

### **Homelessness**

- 0 persons provided with shelter

### **Jobs**

- 30 Businesses Technical Assistance provided

### **Community Improvements**

- 2817 persons served by improved public facilities or infrastructure
- 4 households assisted by public services



**Comparison of the proposed versus actual outcomes for each outcome measure submitted with the consolidated plan and explain, if applicable, why progress was not made toward meeting goals and objectives. 91.520(g)**  
 Categories, priority levels, funding sources and amounts, outcomes/objectives, goal outcome indicators, units of measure, targets, actual outcomes/outputs, and percentage completed for each of the grantee’s program year goals.

Goal	Category	Source / Amount	Indicator	Unit of Measure	Expected – Strategic Plan	Actual – Strategic Plan	Percent Complete	Expected – Program Year	Actual – Program Year	Percent Complete
Create and retain jobs	Non-Housing Community Development	CDBG: \$	Jobs created/retained	Jobs	150	116	77.33%	30	5	16.67%
Create and retain jobs	Non-Housing Community Development	CDBG: \$	Businesses assisted	Businesses Assisted	10	10	100.00%	2	1	50.00%
Decrease number people experiencing homelessness	Homeless	ESG: \$	Tenant-based rental assistance / Rapid Rehousing	Households Assisted	2500	2891	115.64%	250	712	284.80%
Decrease number people experiencing homelessness	Homeless	ESG: \$	Homeless Person Overnight Shelter	Persons Assisted	15000	11159	74.39%	3000	3190	106.33%
Increase supply and quality of affordable housing	Affordable Housing Public Housing Homeless Non-Homeless Special Needs	CDBG: \$ / HOME: \$ / HTF: \$ / CDBG-RHP: \$	Rental units constructed	Household Housing Unit	350	364	104.00%	70	142	202.86%



Goal	Category	Source / Amount	Indicator	Unit of Measure	Expected – Strategic Plan	Actual – Strategic Plan	Percent Complete	Expected – Program Year	Actual – Program Year	Percent Complete
Increase supply and quality of affordable housing	Affordable Housing Public Housing Homeless Non-Homeless Special Needs	CDBG: \$ / HOME: \$ / HTF: \$ / CDBG-RHP: \$	Rental units rehabilitated	Household Housing Unit	350	328	93.71%	70	59	84.29%
Increase supply and quality of affordable housing	Affordable Housing Public Housing Homeless Non-Homeless Special Needs	CDBG: \$ / HOME: \$ / HTF: \$ / CDBG-RHP: \$	Homeowner Housing Added	Household Housing Unit	10	0	0.00%	2	0	0.00%
Increase supply and quality of affordable housing	Affordable Housing Public Housing Homeless Non-Homeless Special Needs	CDBG: \$ / HOME: \$ / HTF: \$ / CDBG-RHP: \$	Homeowner Housing Rehabilitated	Household Housing Unit	500	413	82.60%	100	97	97.00%
Increase supply and quality of affordable housing	Affordable Housing Public Housing Homeless Non-Homeless Special Needs	CDBG: \$ / HOME: \$ / HTF: \$ / CDBG-RHP: \$	Housing for Homeless added	Household Housing Unit	25	491	1,964.00%	25	27	108.00%





Goal	Category	Source / Amount	Indicator	Unit of Measure	Expected – Strategic Plan	Actual – Strategic Plan	Percent Complete	Expected – Program Year	Actual – Program Year	Percent Complete
Strengthen communities and improve quality of life	Non-Housing Community Development	CDBG: \$	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	Persons Assisted	21450	8010	37.34%	4290	4932	114.97%
Strengthen communities and improve quality of life	Non-Housing Community Development	CDBG: \$	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	250	117665	47,066.00%	50	75	150.00%
Strengthen communities and improve quality of life	Non-Housing Community Development	CDBG: \$	Public service activities for Low/Moderate Income Housing Benefit	Households Assisted	1500	3332	222.13%	300	889	296.33%
Strengthen communities and improve quality of life	Non-Housing Community Development	CDBG: \$	Brownfield acres remediated	Acre	2	0	0.00%	1	0	0.00%
Strengthen communities and improve quality of life	Non-Housing Community Development	CDBG: \$	Buildings Demolished	Buildings	2	5	250.00%			

**1. Created and retained jobs:**

Due to a couple of economic development projects that are nearly complete only a few jobs were added to the number of new hires/retaining employees, but the state is still on target to meet the 5-year plan projections. Vermont continues to struggle with the post COVID19 pandemic and flooding economic impacts as there continues to be challenges for our current businesses to hire and create new jobs as well as retaining employment.





**2. Decrease the number experiencing homelessness:**

Due to the continued impact of the COVID-19 pandemic, there was an increased demand on rental assistance as households struggled to obtain and maintain stable housing without assistance. For the second year in a row, OEO significantly increased the amount of financial assistance available to those experiencing homelessness during SFY24 in response to growing need. The number of households reported here includes those who received medium-term rental assistance through Rapid Re-Housing projects, as well as households experiencing homelessness that received client-based financial assistance. Financial assistance was used for a variety of expenses, including short-term rental assistance. In SFY24, OEO exceeded our annual goal for number of persons provided with emergency shelter. The State of Vermont has seen an ongoing increase in the number of people experiencing homelessness since the COVID-19 pandemic and has made it a priority to increase the number of shelter beds available in response. Over the span of the 5—year plan, OEO did not meet the overall target of sheltered 15,000 people, driven primarily by the need to reduce capacity in shelter during the height of the pandemic.

**3. Increase supply and quality of affordable housing:**

Due to many housing projects completing this year, our rental units created doubled the annual projection and the targets for rehabilitation of rental and homeownership units were nearly met. The state anticipates meeting all the housing targets within the strategic plan, except for the target for homeownership units created. This is due to no projects awarded for that activity until this year and those units are not anticipated to be completed until our strategic plan period. The mandate for housing developers to dedicate 15% of the units for the homeless has increased the number of units available for the homeless. We will continue to track that mandate to see if we need to increase our proposed numbers for homeless units.

**4. Strengthening communities and improve quality of life:**

Due to a few public facilities and a public service project completed this year the annual projections were exceeded. A public service project completed in last year's impacted the number of persons served due to a foodbank that services the whole state. We will need to evaluate our projected numbers for Public Service activities in the pipeline and adjust accordingly.

**NOTE:** We do not truly know the ramifications of the July 2023 and July 2024 Vermont floods and how it will affect the state's projected numbers. Many communities in our state were impacted and have had to change their focus to flood relief. With limited businesses, resources for contractors, and supply chain demand we anticipate impacts to the projects in our portfolio.



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

State of Vermont's highest priorities for FY23 was to create housing and provide employment opportunities, with preference for facilitating development and growth in Designated Downtowns and Village Centers. The overarching principal, which drives all of Vermont's efforts, in affordable housing is to continue to achieve perpetual affordability through the use of mechanisms which produce housing resources that remain affordable over time. The activities and actions in the plan are designed to benefit extremely low-, low-, and moderate-income persons as defined by HUD, and persons with disabilities or other special needs.

Vermont Affordable Housing projects generally receive the majority of CDBG funding from year to year. This year was no exception, affordable housing received 84% of Vermont's CDBG funds. Economic Development projects usually receive the second most funding but for fourth year in a row VCDP has not received any economic development project applications. The impacts of businesses having access to other federal funding sources that were distributed to states such as CDBG-CV, SBA loans, PPP loans, CRF, and ARPA due to COVID19 have businesses looking elsewhere for funding as well as new state programs that are focused on economic development. Businesses have adversely impacted by natural disasters such as multiple flooding events where they are turning to FEMA and other disaster recovery funds.

Public Facility projects accounted for 8%, Public Service projects accounted for 4% and Planning projects accounted for 4% of the CDBG funding allocated in the 2023 program year.

This year for housing activity 243 housing units were created/rehabilitated which brings us to 91% of our projected amount for our 5-year consolidated plan goal, with one more year remaining to report on we anticipate meeting our housing unit goals. Three specific examples of CDBG projects which supported housing are:

**Town of Bristol – Firehouse Apartments:** received \$585,000 that was subgranted to Addison County Community Trust who acquired and constructed 20 new units of housing on Firehouse Drive in Bristol, of which 16 units are designated for low- and moderate-income households. Currently all units are occupied by low- and moderate-income households. This is a mixed-income housing development including one 16-unit building and two duplex buildings.

**Town of Colchester - Stuart Avenue Apartments:** received \$650,000 that was subgranted to Champlain Housing Trust, in partnership with Evernorth, who acquired and constructed 36 new affordable rental apartments within Colchester's New Town



Center designation at Severance Corners.

**Town of Rockingham – Bellows Falls Garage:** received \$292,745 that was subgranted to Windham and Windsor Housing Trust to support the demolition of the former Bellows Falls Garage, with the original façade being restored and a new 27 rental unit building with commercial and community meeting space constructed at 115 Rockingham St. in the Bellows Falls Designated Downtown. Twenty of the apartments are designated for affordable to households earning less than 80% AMI. Currently 26 of the units are occupied by low- and moderate-income households.

This year for economic development activity there was not a lot of activity reported for projects.

### **CDBG-CV**

State of Vermont's highest priorities for CDBG-CV funds were to assist Sole Proprietor businesses with technical assistance, low-income homeowners and tenants with subsistence payment, counseling, and residential rehabilitation (only for demonstrated COVID requirements), and communities with public facility and services that were impacted by COVID19 and had unmet needs.

A total of 2847 Vermonters has benefitted from CDBG-CV funds over the past year through CDBG-CV projects serving business technical assistance and public facilities.

During FY23 CDBG-CV funds assisted 30 businesses with technical assistance. The CDBG-CV program is winding down with only a few projects that remain open. Only one CDBG-CV project was enhanced this past year:

**Town of Springfield- Hubert Building Ventilation System:** received an additional \$230,000 enhancement bringing the total to \$755,000 to subgrant to the Springfield Housing Authority to complete HVAC system improvements to the Huber Building as a response to and prevention of the spread of COVID-19. The Huber Building includes the Housing Authority's main offices and meeting space as well as having 60 units of senior housing and housing for disabled adults, of which 46 units are currently occupied.



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

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

	CDBG	HOME	HTF
White	5963	39	14
Black or African American	89	0	3
Asian	29	3	0
American Indian or American Native	21	0	0
Native Hawaiian or Other Pacific Islander	1	0	0
<b>Total</b>	<b>6103</b>	<b>42</b>	<b>14</b>
Hispanic		2	0
Not Hispanic		40	14

Describe the clients assisted (including the racial and/or ethnicity of clients assisted with ESG)

	HESG
American Indian, Alaska Native, or Indigenous	41
Asian or Asian American	31
Black, African American, or African	356
Hispanic/Latina/e/o	83
Middle Eastern or North African	0
Native Hawaiian or Pacific Islander	10
White	2,321
Multiracial	214
Client doesn't know	0
Client prefers not to answer	0
Data not collected	0
<b>Total</b>	<b>3,056</b>

Table 1 – Table of assistance to racial and ethnic populations by source of funds

## Narrative

CDBG had an additional 274 under 5 other ethnicity categories that are tracked in IDIS but are not available in the list above.

CDBG-CV served 2851 individuals:

- White 2831
- Black of African American 11
- Asian 2
- American Indian or Alaska Native 1
- Native American Indian/Alaskan Native & White 1



- Asian White
- Multiple races 5
- Hispanic 60
- Non-Hispanic 2791



# CR-15 - Resources and Investments 91.520(a)

Identify the resources made available.

Source of Funds	Source	Resources Made Available	Amount Expended During Program Year
CDBG	public - federal	\$7,534,647	\$6,897,998.23
HOME	public - federal	\$3,032,373	\$2,793,745
ESG	public - federal	\$697,788	\$636,743
HTF	public - federal	\$3,066,413	\$2,160,946

Table 2 - Resources Made Available

## Narrative

As of June 30, 2024, all \$7,334,647 of the 2023 annual allocation was obligated and committed and represents 100.00% of the CDBG award. CDBG resources made available to consists of FY23 allocation plus \$200,000 of anticipated Program Income.

This year CDBG grant awards totaled \$6,226,468 which consists of the remaining \$4,583,758 of the FY23 allocation as of July 1, 2023, \$314,327 of program income allocated to grants, \$52,915 reallocated prior year funding, and \$1,275,468 of FY24 funds that was forward committed as of June 30, 2024. This year's Program Income funding was once again critical to absorbing the cumulative cuts seen to our annual allocation. Requests from good, eligible projects continue to exceed available funding.

The amount of funds expended for CDBG consists of FY17, FY18, FY19, FY20, FY21, FY22, FY23 and Program Income for awarded projects and state administration.

Additionally, \$230,000 was made available through CDBG-CV to award enhancements and \$997,497 was expended. CDBG-CV resources available for next year are \$858.

HOME and HTF resources made available consist of Vermont's FFY2023 allocation. The expended amounts for HOME and HTF include FFY2023 funds as well as previous annual allocations

ESG resources made available consists of Vermont's FFY2023 allocation, including what was available for state administration. The expended amount for ESG includes the amount of FFY2023 funds expended during the July 1, 2023 – June 2024 program period, including what was expended for state administration.



**Identify the geographic distribution and location of investments**

Target Area	Planned Percentage of Allocation	Actual Percentage of Allocation	Narrative Description

Table 3 – Identify the geographic distribution and location of investments

**Narrative**

In keeping with the State’s long-standing policy, the State does not plan to target assistance to specific geographic regions. CDBG and HOME funds will be allocated on a competitive basis to locally driven projects that address priority needs. ESG funds are awarded as part of the statewide Housing & Opportunity Grant Program (HOP). Awards are made on a competitive basis according to local needs. A single entity acts as the statewide rental assistance administrator for the state. Vouchers were allocated geographically based on need. Subrecipient grants for support services were awarded through a competitive process and cover the whole state.

CDBG during the 2023 Program Year awarded 100% of the funds to projects with LMI as the national objective. This level of benefit far exceeds the current Congressional and HUD requirement that at least 70% of the state’s annual allocation be awarded to activities that primarily benefit low- and moderate-income persons.

CDBG and CDBG-CV projects are listed as added text below and also can be found in Attachment 2 - VCDP PR28 Awards Allocations and National Objectives on CR-00.

During the Program Year VHCB fully committed all of the project funds from Vermont’s 2023 HTF allocation to five affordable housing projects listed below.

**Projects awarded during FY23 CDBG funds (see Attachment 2 for additional information):**

- Town of Shelburne, Bay Ridge, \$700,000
- Town of Windsor, Central and Main, \$500,000  
(later withdrew award due to BABA regulations)
- City of Rutland, East Creek Commons, \$500,000
- Town of Underhill, Harvest Crossing Affordable Housing, \$500,000
- Town of Pittsford, Pittsford Village Farm Adaptive Reuse, \$450,000
- Town of Rockingham, GRAS -Biomass Wood Chip Heating System, \$250,000
- City of Vergennes, All Access Project Vergennes Opera, \$150,000
- Town of Randolph, Playhouse, \$54,000
- Town of Granville, Granville Town Hall Accessibility, \$59,058
- City of Rutland, Merger of HTRC and NWWVT, \$60,000
- Town of St. George, St. George EOC Accessibility Planning, \$42,600





**Projects awarded enhancements during FY23 CDBG funds:**

- Town of Brattleboro, WWHT Homeownership Services, \$440,000
- Town of Lyndon, NEK Home Repair Program, \$400,000
- City of Montpelier, Green Mountain Home Repair Downstreet, \$360,000
- City of St. Albans, CHT Home Repair Loan Program, \$540,000
- Town of West Rutland, Comprehensive HOME/RENTAL Repair 2022, \$500,000
- Town of Bennington, Benn High Redevelopment, \$613,810
- Town of Bridgewater, Bridgewater Community Center, \$47,000
- Town of Milton, Milton Mobile Home Community Water Sewer Project, \$50,000
- Town of Rochester, Rochester High School Repurposing Project, \$10,000

**Projects awarded enhancements during FY23 CDBG-CV funds:**

- Huber Building Ventilation System, Town of Springfield, \$230,000

**Projects awarded FFY'2023 HTF funds:**

- Bay Ridge Apartments, Shelburne, \$131,936  
(total including HTF '22 = \$1,156,152)
- Reid Commons, St. Albans, \$366,264
- Post Apartments, Burlington, \$194,993 (total including HTF '22 \$594,993)
- Marble Village, West Rutland, \$1,034,500
- Melishwood Apartments, Woodstock, \$1,032,078.90

**Projects awarded FFY'2023 HOME funds:**

- Salisbury Square 2, Randolph, \$570,000
- Alice Holway Drive, Putney, \$585,000
- Calendonia Crossing, Peacham & Danville, \$555,000
- Reid Commons, St. Albans, \$540,000 (CHDO project)
- Fox Run, Berlin, \$222,669.69 (total including HOME '22 = \$750,000)
- Marsh House, Waterbury, \$106,466.01

**Two (2) HOME FFY'2023 CHDO Operating grants were provided to the following certified CHDOs:**

- Windham & Windsor Housing Trust, Brattleboro \$78,000
- Cathedral Square Corporation, South Burlington, \$72,000



## Leveraging

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

Leverage of non-Federal resources - The source of these funds included the Vermont Housing and Conservation Board, the Vermont Housing Finance Agency, New Market Tax Credits, commercial lenders, owner equity, and Vermont and local community loan funds.

The State continues to be very successful leveraging other resources. Some of this success is the result of coupling resources and holding concurrent application cycles. Generally, the State will encourage leveraging by awarding more points in the application process. State resources have also been effectively used to match or administratively support other federal and private resources. It is the intent of the State to continue this type of leveraging and encourage more opportunities for leveraging in the future, particularly with private sources.

During the 2023 Program Year, which ended June 30, 2024, CDBG awards projected to leveraged over \$74 million in other resources. The Vermont Community Development Program has some programmatic match requirements. During the staff review process for each project the match contribution documentation is analyzed and evaluated to be certain it satisfies the requirement. CDBG CV funds do not require match funding.

During the 2023 Program Year ending on June 30, 2024, matching funds totaling \$8,295,834.97 were expended on HOME projects, as documented below. These funds were directly invested in the projects from the State of Vermont’s Housing Trust Fund, donations, and other State sources.

Although the HTF program does not require any match, the use of these funds in Vermont leverages hundreds of thousands of dollars of additional resources for affordable housing.

ESG funds leveraged \$618,915.20 in other state resources as match funding to support ESG activities.

Fiscal Year Summary – HOME Match	
1. Excess match from prior Federal fiscal year	86,511,265
2. Match contributed during current Federal fiscal year	8,295,835
3. Total match available for current Federal fiscal year (Line 1 plus Line 2)	94,807,100
4. Match liability for current Federal fiscal year	295,895
5. Excess match carried over to next Federal fiscal year (Line 3 minus Line 4)	94,511,205

• Table 4 – Fiscal Year Summary - HOME Match Report



Match Contribution for the Federal Fiscal Year								
Project No. or Other ID	Date of Contribution	Cash (non-Federal sources)	Foregone Taxes, Fees, Charges	Appraised Land/Real Property	Required Infrastructure	Site Preparation, Construction Materials, Donated labor	Bond Financing	Total Match
Bellows Falls Garage	12/09/2021	2,074,070	0	0	0	0	0	2,074,070
Burkeland Apartments	05/02/2022	1,080,429	0	0	0	0	0	1,080,429
Clark Canal Phelps	05/24/2022	760,413	0	0	0	0	0	760,413
Firehouse Apartments	07/05/2022	1,100,000	0	0	0	0	0	1,100,000
Stuart Ave Apartments	03/17/2022	1,720,000	0	0	0	0	0	1,720,000
Village Center Apartments	07/21/2021	1,560,923	0	0	0	0	0	1,560,923

Table 5 – Match Contribution for the Federal Fiscal Year

**HOME MBE/WBE report**

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

Table 6 – Program Income



<b>Minority Business Enterprises and Women Business Enterprises – Indicate the number and dollar value of contracts for HOME projects completed during the reporting period</b>						
	Total	Minority Business Enterprises				White Non-Hispanic
		Alaskan Native or American Indian	Asian or Pacific Islander	Black Non-Hispanic	Hispanic	
<b>Contracts</b>						
Dollar Amount	32,780,588	0	0	0	0	32,780,588
Number	6	0	0	0	0	6
<b>Sub-Contracts</b>						
Number	112	0	0	1	1	110
Dollar Amount	21,630,529	0	0	413,560	310,613	20,906,355
	Total	Women Business Enterprises	Male			
<b>Contracts</b>						
Dollar Amount	32,780,588	0	32,780,588			
Number	6	0	6			
<b>Sub-Contracts</b>						
Number	112	8	104			
Dollar Amount	21,629,729	20,595,149	1,034,580			

Table 7 - Minority Business and Women Business Enterprises

<b>Minority Owners of Rental Property – Indicate the number of HOME assisted rental property owners and the total amount of HOME funds in these rental properties assisted</b>						
	Total	Minority Property Owners				White Non-Hispanic
		Alaskan Native or American Indian	Asian or Pacific Islander	Black Non-Hispanic	Hispanic	
Number	6	0	0	0	0	6
Dollar Amount	3,315,000	0	0	0	0	3,315,000

Table 8 – Minority Owners of Rental Property

<b>Relocation and Real Property Acquisition – Indicate the number of persons displaced, the cost of relocation payments, the number of parcels acquired, and the cost of acquisition</b>		
Parcels Acquired	10	3,344,203
Businesses Displaced	0	0
Nonprofit Organizations Displaced	0	0
Households Temporarily Relocated, not Displaced	34	195,333



Households Displaced	Total	Minority Property Enterprises				White Non-Hispanic
		Alaskan Native or American Indian	Asian or Pacific Islander	Black Non-Hispanic	Hispanic	
Number	1	0	0	0	0	1
Cost	14,658	0	0	0	0	14,658

Table 9 – Relocation and Real Property Acquisition



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

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

	One-Year Goal	Actual
Number of Homeless households to be provided affordable housing units	430	739
Number of Non-Homeless households to be provided affordable housing units	217	272
Number of Special-Needs households to be provided affordable housing units	0	0
<b>Total</b>	<b>647</b>	<b>1011</b>

Table 10 – Number of Households

	One-Year Goal	Actual
Number of households supported through Rental Assistance	400	712
Number of households supported through The Production of New Units	77	142
Number of households supported through Rehab of Existing Units	170	131
Number of households supported through Acquisition of Existing Units	0	26
<b>Total</b>	<b>647</b>	<b>1011</b>

Table 11 – Number of Households Supported

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

The variance between the Goals and the Actuals for new and rehab units was due to the number of projects completing this year.

Due to the continued impact of the COVID-19 pandemic, there was an increased demand on rental assistance as households struggled to obtain and maintain stable housing without assistance. For the second year in a row, OEO significantly increased the amount of financial assistance available to those experiencing homelessness during SFY24 in response to growing need. The number of households reported here includes those who received medium-term rental assistance through Rapid Re-Housing projects,



as well as households experiencing homelessness that received client-based financial assistance. Financial assistance was used for a variety of expenses, including short-term rental assistance.

It is also important to note that projects that received HOME and HTF funding that were completed this year resulted in the creation of a total of 172 units of housing with affordability covenants from VHCB. However, only the 53 units that were directly assisted with HOME or HTF funding are included in these reporting numbers. Of those 172 units, 29 units are not accounted for in the totals of affordable housing created/rehabbed because they did not receive funding from CDBG, HOME or HTF. Of the 29 units, there were 29 rental units rehabilitated.

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

Due to Vermont's increased poverty rate and growing homeless population, the state continues to require non-profit housing developers to set aside 15% of their units in their housing portfolio for preventing homelessness which will likely increase the numbers of homeless individuals being served. We will continue to analyze these numbers over the next few years to more fully understand the impact of this requirement.

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

Number of Households Served	CDBG Actual	HOME Actual	HTF Actual
Extremely Low-income	86		13
Low-income	73	12	
Moderate-income	67	28	
<b>Total</b>	<b>226</b>		

Table 12 – Number of Households Served

**Narrative Information**

The above data for CDBG is a combination of households served for housing construction, housing acquisition, and housing rehabilitation. There were an additional 17 households served that were non LMI.

Most of the households initially leased up in HOME units completed this year were extremely low or low-income, significantly exceeding the requirements of the program.

The State of Vermont only funds projects to maintain or increase the number of affordable housing units in perpetuity serving the majority of 60% of below Area Median Income levels.





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

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

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

Vermont provided outreach to homeless persons through a network of local agencies, including shelters, service agencies and housing providers. United Way 2-1-1 provides a one-stop resource and referral point for all persons.

The PATH Program provided assistance to several Vermont organizations to conduct outreach efforts to people experiencing a serious mental illness or co-occurring disorder. PATH is funded by the U.S. Dept. of Health & Human Services and administered in Vermont by the AHS Department of Mental Health. In SFY24 the Department for Children and Families (DCF) provided the Department of Mental Health with \$1.5 million in additional state funds to expand the PATH Program. Funding was made available through a one-time appropriation received by DCF in order to respond to the increased needs of unsheltered Vermonters during SFY24.

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

A total of 3,190 persons were sheltered for a total of 186,188 shelter bed nights in VT's publicly funded shelters in SFY2024. The Agency of Human Services continues to focus on how to increase emergency shelter capacity around the state and the Office of Economic Opportunity has been able to use one-time funds to support the standing up of additional projects in SFY24. Sources for ongoing funding to support these projects and continue to develop new shelters is currently being evaluated.

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

Vermont leveraged significant State resources to divert low-income individuals and families from homelessness. Homelessness prevention activities funded under the OEO



Housing Opportunity Grant Program stabilized housing for 1,168 households at risk of homelessness. The following initiatives addressed discharge from publicly funded institutions and systems of care:

- The Reach Up Emergency Rental Assistance Program, administered by the AHS Department for Children & Families, continued to help renters dealing with financial challenges related to the pandemic. For eligible households, the program offered rental assistance to help avoid eviction.
- AHS Department for Children & Families' Housing Stability Services program funded 20 non-profit organizations around the state to identify and support households in applying for Emergency Rental Assistance Program financial assistance, as well as support those already determined eligible. The program supported households through a variety of funded activities: VERAP application assistance, landlord outreach and education, housing navigation services, housing retention services, legal services, and credit repair/money management.
- AHS Department for Children & Families, and its partnerships, ensured persons being discharged from the foster care system are not routinely discharged into homelessness and are accessing mainstream resources, including the Sect. 8 Family Unification Vouchers for youth in transition.
- State-funded Mental Health Subsidy & Care program, modeled on HUD Shelter plus Care, targeted assistance towards homeless persons in hospitals to ensure a successful discharge into housing, not homelessness or McKinney-Vento funded programs.
- The AHS Department of Corrections (DOC) ensured persons being discharged from the corrections system of care are not routinely discharged into homelessness. If suitable permanent housing in the community could not be located for a person exiting Corrections, DOC utilizes a comprehensive statewide system of transitional housing to ensure that persons are not routinely discharged into homelessness.

**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**

VT provided over \$6.4 million in client financial or rental assistance from all Housing Opportunity Grant Program funding sources in SFY24, including for Homelessness Prevention and Rapid Re-Housing activities. Through Homelessness Prevention services, 86% of households had their housing stabilized or were safely re-housed. 55% of those households remained stably housed after 90 days. Through Rapid Re-housing services, 27% of households were safely re-housed and 41% of those households remained stably housed after 90 days.



The Vermont Balance of State Continuum of Care's Coordinated Entry system has developed formal partnerships with affordable housing providers as a way to ensure new rental units are made accessible to households experiencing homelessness. Through MOUs or other agreements, landlords and developers agree to accept referrals through the Coordinated Entry system for their new or turned over units.



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

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

The state's PHA resident associations and service providers have been working together to make the public housing communities safe, clean, decent, and sanitary places to live and raise children. PHA's have also been working collaboratively with other Affordable Housing Providers to coordinate services and share resources to make efficient use of limited funding resources.

In addition, the Commissioner of DHCD reviewed and certified the PHA plans that were submitted were consistent with the State's Consolidated Plan.

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

Vermont has a coalition of PHA's and the lead coordinator is from Montpelier Public Housing Authority, who also meets regularly with Vermont's Housing Council housing related issues. That lead coordinator reports back to the other PHA's. Vermont has nine Public Housing Authorities, one of which is a statewide housing authority, one is in the entitlement community and the other seven are throughout the state. The Vermont State Housing Authority, Burlington Housing Authority and Brattleboro Housing Authority utilize the Family Self Sufficiency Program. Each of the PHA's have or encourage Resident Advisory Boards or Committees, but due to COVID19 many are struggling with in person meetings and attendance. Three of the PHA's utilize the Housing Choice Voucher Homeownership Program, the other PHA's that don't have a program collaborate with the state PHA or a local HOC on-homeownership activities.

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

None of Vermont's PHA's are designated as troubled.



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

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

The permitting process is often cited as a barrier to the development of new affordable housing units.

In 2023, the Department of Housing and Community Development (DHCD) was instrumental in proposing and passing Vermont Act 47 (2023) which makes consequential changes to the Planning & Development Act's permissible types of zoning regulation and required provisions and prohibited effects for municipal bylaws. It effectively removes single-family zoning by establishing a statutory standards that allow for duplexes wherever single-family homes are allowed. Further, it allows up to a four-unit dwelling anywhere that is served by municipal water and sewer service. The law also specifically increases allowable density and height of residential units, with specific allowable bonuses to developments with a certain percentage of affordable housing and mixed-income and mixed-use development. The Act goes further in addressing a variety of barriers to affordable housing including preventing deed restrictions on lot sizes, limiting parking requirements for developments in downtown areas, limiting municipal oversight and resistance to citing emergency shelters, increasing funding to the Municipal and Regional Planning fund, and myriad more reforms and initiatives. Together, these steps will break down significant barriers and empower responsible developers with broader paths to permit acquisition and reduce development costs. This in turn, helps Vermont meet its fair housing goals of providing affordable and accessible housing. DHCD continues to offer technical support and grants to regional planning commissions and municipalities to adapt to the changes made.

Additionally, through a multi-year effort, DHCD successfully sought the reform of the Statewide land use law known as Act 250 (2024). In 2023, DHCD worked with the Vermont Legislature to commission a study for reform of Act 250, Vermont's State-wide land use law. DHCD actively participated in the study committee and advocated for changes that lower barriers to affordable housing. Further, DHCD undertook its own study to reform the State Designation Programs which work to provide incentives and regulatory relief in targeted development areas such as downtowns and Village Centers, which include exemptions from Act 250 and required reform of municipal zoning laws. DHCD worked with several other State of Vermont Agencies and government component parts, along with stakeholder organizations to ultimately pass Act 181 (2024). This landmark legislation amends Vermont's fifty-year-old state-wide land use



law. These amendments create a path toward state-wide mapping and planning that will exempt historic downtowns, village centers, and targeted growth areas from the state-wide land use requirements, as well as ensure adequate environmental protections for surrounding areas. The goal of the reform is to spur development of housing in denser areas, while protecting Vermont's natural resources. The new Act 181 also includes interim exemptions for housing development to ensure immediate needs for regulatory relief were met while the state-wide planning and mapping process is underway. Further, the Act includes an updated incentive structure for municipalities to actively map and plan development.

Finally, the DHCD provides State-funded grants to communities to pursue municipal bylaw (zoning) modernization to ensure the regional planning commissions and municipalities have adequate resources to respond to the changes made and mandates by the Legislature. DHCD also assisted in developing an [Interim Act 250 Exemption Map](#) to assist housing developers to determine where regulatory incentives for development actually apply. Finally, DHCD continues to offer resources through the Vermont Community Development Program, such as the "Equal Treatment of Housing" chart. The chart was created and posted online to provide at-a-glance recommendations for meeting the requirements of [24 V.S.A. Chapter 117 § 4412](#) when adopting bylaws. Communities are required to demonstrate how their Town Plan supports efforts to affirmatively further fair housing, as outlined in the 2017 AI Action Plan Update.

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

The State continues to work with Vermont Housing Finance Agency (VHFA) to refine and disseminate the information contained on the HousingData.org Community Profiles page. This extensive resource is empowering community members and local decision makers in understanding the unique housing and service needs and resources in their communities. It continues to be expanded in both content and functionality and will prove to be an ongoing and increasingly useful resource as data becomes available. DHCD, via a contract with VHFA has just published the latest 2025 [Vermont Housing Needs Assessment](#) to provide a comprehensive view of the State's needs for housing of all varieties.

The State is also supporting Homeownership centers across Vermont to provide financial incentives to small-scale landlords to bring underutilized housing units back to minimum housing standards so that they can be brought back into the rental market. This effort included a significant infusion of Coronavirus Relief Fund (CRF) dollars, and American Rescue Plan Act, State Fiscal Recovery Fund (ARPA-SRF) dollars, and now State General Fund dollars. During this reporting period, the ARPA and State funded program brought hundreds more units online, all of which are being rented at HUD Fair Market Rents and the majority of the completed units provide housing for Vermonters exiting homelessness. This program is ongoing with additional consideration for serving



Vermonters experiencing homelessness as well as families and individuals arriving to the state as refugees and humanitarian parolees as part of federal resettlement programs. Concurrently, state-supported homeownership centers have been encouraged to apply at least 10% of their home renovation funding programs to serve the rehabilitation needs of rental units in underserved areas.

Additionally, the State Department of Housing and Community Development has significantly increased coordination with the Agency of Human Services and the homeless service providers in the state's "Continuum of Care", as well as managers of publicly funded housing to align support services and rental assistance with vacant housing units that can be utilized by those experiencing homelessness. Significant efforts continue to retrofit congregate shelters to allow for physical distancing protocols as well as bring new, service enriched housing units online in the wake of the pandemic.

Finally, the Department of Housing and Community Development has enhanced relations with AALV, USCRI, and ECDC (formerly Ethiopian Community Development Council), organizations that address the needs of New Americans located in Vermont through refugee resettlement and humanitarian parolee programs. These partnerships will allow for greater information dissemination to non-English speakers and allow us to better understand and meet the needs of these communities.

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

As outlined in the annual action plan, activities were undertaken as follows:

1. During FFY2023 the VHCB Lead Hazard Reduction Program controlled lead paint hazards in 19 units of housing serving low-income families.
2. The Burlington Lead Program controlled lead paint hazards in 13 units in Burlington and Winooski during the last year.
3. The Vermont Department of Health continues to operate a Lead Poisoning Prevention and Healthy Homes Program, partially funded by CDC, which completes numerous activities to raise awareness about lead poisoning and other home-based health and safety hazards.
4. Vermont passed legislation in 2018 that authorizes the Vermont Department of Health to work with EPA to accept delegation of responsibility and administration of the RRP rule in Vermont. This action will reduce overlapping and confusing state and federal rules and result in better compliance with RRP and Vermont's lead paint laws. This transition is continuing.
5. The Vermont Department of Health (VDH) continues to implement the provisions of the original law which was updated by the Legislature in 2008. Owners of pre-1978 rental properties and childcare facilities are required to complete certain





Essential Maintenance Practices and to annually submit Compliance Statements attesting to their completion. VDH has developed and implemented an electronic filing system for Compliance Statements.

6. The Vermont Housing & Conservation Board was awarded a \$4 million HUD Lead Hazard Control grant in early-2023 that will serve low-income Vermont residents through mid-2027. The City of Burlington was awarded their most recent Lead Hazard Control grant in 2022 and continues to operate their program in the Cities of Burlington and Winooski.
7. VHCB staff maintains contact with National Center for Healthy Housing (NCHH) staff on a regular basis concerning issues like lead poisoning prevention and healthy homes activities.
8. Staff from VHCB, the Vermont Department of Health and other agencies continue to participate on the New England Lead Coordinating Committee, although its activities have been limited in recent years.
9. The Vermont Housing Finance Agency and the Vermont Housing & Conservation Board continue to examine their policies regarding lead-based paint, health, safety, or toxic and hazardous materials and where necessary amend them to conform with the latest knowledge of these problems.
10. Coordination continues with the Department of Health, the Vermont State Housing Authority and local Public Housing Authorities regarding childhood poisoning in owned and assisted units, as needed.
11. Vermont law requires blood lead testing of all one- and two-year-old children, and these results are required to be reported to VDH, a significant database has been developed.
12. VHCB and Burlington have worked with weatherization programs to incorporate lead safe work practices and to include other healthy homes treatments where feasible. VHCB also piloted a program to do weatherization work in homes with vermiculite which possibly contains asbestos.
13. Outreach and public education efforts continue through VHCB, Burlington, VDH and other community-based organizations throughout the State.
14. VHCB and Burlington participate in the One Touch Vermont program along with a host of other social service agencies and providers, including child services, weatherization, mental health surfaces, hospitals, etc. This program seeks to get various programs out of their silos and working together to more efficiently provide services to the most at-risk clients.
15. The State of Vermont has adopted new regulations which took effect in



November 2022 under which the State now administers the RRP law and has incorporated its existing Essential Maintenance Practices requirements with RRP requirements.

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

The State's strategy to reduce the number of poverty level families was to (a) meet basic subsistence requirements for those in need, (b) strengthen and preserve families, (c) support self-empowerment, and (d) provide housing opportunities.

After administering \$25 million of Coronavirus Relief Funds (CRF) to create the “Rental Housing Stabilization Program”, a then-unprecedented rental assistance program that assisted over 6,000 unique households to maintain their housing during the early days of the COVID-19 pandemic, Vermont aggressively employed the Emergency Rental Assistance Program funding to maintain support for low-income families struggling to maintain housing due to rental cost burden. These efforts have supported over 14,000 households to maintain their residences through direct financial assistance as well as housing supports and navigation, mediation and eviction prevention efforts, and assistance with addressing emergency habitability issues to avoid displacement. Additionally, DHCD continues work with the Vermont Housing Finance Agency to administer a mortgage relief program for homeowner households that experienced hardship due to income loss during COVID-19 response. To-date, the Vermont Housing Finance Agency program has assisted over 7,000 households to prevent foreclosure, tax-sale, or disconnection of utilities. The Program continues to provide funding for legal assistance for homeowners facing foreclosure.

The policies and programs for achieving a reduction in poverty are primarily coordinated through the Department for Children and Families (DCF) of the Agency of Human Services (AHS). DCF administers anti-poverty programs and benefits programs such as the federal Community Services Block Grant, Housing & Opportunity Grant Program (including ESG), Weatherization Assistance Program, TANF, SNAP (3SquaresVt), Medicaid, General Assistance, and Fuel Assistance. Economic Services also administers Vermont's Reach-Up (TANF) Program which provides education, training, and employment opportunities for welfare recipients working toward self-sufficiency. The Agency of Human Services continues to implement its policy that requires adults who are receiving financial assistance under the Temporary Assistance to Needy Families (TANF) or Temporary Assistance to Other Needy Families (TAONF) to participate in work programs. Also, every work mandatory adult who has received assistance for at least 24 months must participate in a work activity. The adult must participate in an activity for each month he or she receives financial assistance after month twenty-four.

Through its programs, DCF's Office of Economic Opportunity works in partnership with the private sector, community-based organizations, agencies of government, and other groups to eliminate the causes and symptoms of poverty.



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

In the last several years, affordable housing providers and representatives of health, mental health, environmental, labor, and service agencies have substantially strengthened their networking and coordination activities. The State, through the DHCD, has actively encouraged and participated in these efforts and will continue to do so. In the last year the following actions were undertaken:

Continued the coordination of resources to support the most needed affordable housing projects from housing funders and health & human services agencies. This includes ongoing discussions with the other major housing funding organizations to better align grant application and decision timelines to reduce administrative cost and burden on developers;

Served on the Board of Directors for the Vermont Coalition to End Homelessness, participated in the Continuum of Care Ranking Committee for program funding, and maintain voting membership on the Vermont Interagency Council on Homelessness (now the Vermont Council on Housing and Homelessness);

Continued coordination efforts with the agencies of Health, Department of Public Safety Division of Fire Prevention, Natural Resources, Office of Economic Opportunity, and Attorney General to address serious health, safety and environmental issues in mobile home parks, including providing direct response and assistance to mobile home park residents affected by the July 2023 and July 2024 flooding events;

Partnered with the Vermont State Housing Authority and the Vermont Housing Finance Agency to transition from COVID-19 response programs to provide a clear path for ramp-down of rental and mortgage assistance to those affected by the pandemic response, and to continue to assist individuals in need with other available programs;

Coordinated with Vermont Legal Aid and the Vermont Housing Finance Agency to provide continued services to individuals facing foreclosure after the cessation of Pandemic-Era mortgage relief programs;

Continued, through the Department's leadership of the Housing and Homelessness Council, formation of state policy and will assist housing providers, state agencies, such as the Vermont Housing and Conservation Board, (VHCB), Vermont State Housing Authority (VSHA) and others to ensure the availability of safe and affordable housing for all Vermonters.



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

Through the Department of Housing and Community Development and the Agency of Human Services, the State of Vermont has strongly encouraged coordinating efforts with the Vermont State Housing Authority, Vermont Housing and Conservation Board, local Public Housing Authorities, private landlords and other housing organizations to ensure that housing services reach Vermont's neediest citizens.

Examples of such collaborations include:

Coordination through the Vermont Council on Homelessness to carry out strategies included in the ten-year plan to end homelessness in Vermont;

Working with housing providers and providers of services to the homeless to track progress towards the goal of ensuring that at 15%-25% of units in publicly supported housing developments are available to and utilized by families and individuals exiting homelessness;

Support in implementing and expanding the application of "landlord liaisons" to encourage better communication between private landlords and homeless service providers seeking permanent housing for their clients as well as improving service provisions to maximize successful housing situations for those in need;

The Vermont Housing and Homelessness Council, which provides a coordinating forum on housing policy and programs with participation from private and non-profit housing developers, State service agencies, affordable housing advocates, and others;

Cross representation on boards of the major housing funding organizations including the Vermont Community Development Board, the Vermont Housing Finance Agency and the Vermont Housing and Conservation Board;

Creation and dissemination of materials to educate landlords managing five or fewer rental units, a critically important market for affordable housing in Vermont;

Coordination with other State agencies and non-profit groups of the range of federal McKinney programs, including ESG and the CoC Supportive Housing Program; and

AHS' active participation in the development and review of the State's Consolidated Plan; and

Partnership with the regional Homeownership centers to administer Coronavirus Relief Funds, ARPA SLFRF funds, and State General Funds, to assist private property owners with necessary health and safety improvements to bring underutilized structures back into the rental stock.



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

Many of the findings, observations, and proposed actions in Vermont's Analysis of Impediments to Fair Housing Choice (AI) remain valid and important for guiding the State's efforts to affirmatively further fair housing. The Department has successfully shepherded legislation to reduce barriers to housing development in areas designated for growth, which is part of an effort to overcome the greatest barrier to affirmatively furthering fair housing: availability of units. The Department regularly conducts Fair Housing Trainings for CDBG grantees and other interested parties in a virtual setting, which expands the potential audience and reduces barriers for attendance. DHCD is also actively working with the Fair Housing Program at the Champlain Valley Office of Economic Opportunity, a recipient of HUD Fair Housing EOI grants, to develop interactive, online trainings in Fair Housing principles and activities to make for more inclusive communities as well as efforts to provide resources for tenants in languages other than English.

The AI identifies seven on-going impediments to fair housing and associated proposed actions to overcome those impediments. They are as follows:

Impediment 1. The State's supply of decent, affordable housing is inadequate. 'Not in My Backyard' (NIMBYism) is a significant factor affecting the development of affordable housing.

- a. Proposed Action: Through the efforts of DHCD, VHFA, and VHCB, the State should continue to strike a balance in investing in both concentrated areas of poverty and areas of opportunity. Investment in housing that is available to families with children is especially important. **Status: on-going**
- b. Proposed Action: DHCD should continue to refuse to grant funding requests for municipalities found to have discriminatory land use provisions. **Status: on-going**
- c. Proposed Action: Anecdotal evidence suggests that difficulties in evicting tenants lead property owners to withdraw housing units from the rental market. DHCD and others should evaluate the extent to which difficulties in the eviction process decrease the availability of rental housing. If it is found that these challenges are affecting the supply of housing, DHCD should recommend and support solutions to that problem, including solutions that will improve housing stability and eviction prevention. **Status: underway**
- d. Proposed Action: DHCD and other agencies should continue to promote fair housing training, education, and outreach services for various stakeholders, including code officials, tenants, municipal officials, landlords, land trusts, CHDOs, various property management companies, and realtors. Training should specifically include Vermont's legal prohibition on discrimination in housing based on receipt of public assistance. **Status: on-going**



- e. Proposed Action: The State, through DHCD, should expand fair housing training opportunities by creating an online training course more easily accessible to municipal officials and grantees of federal funds. **Status: underway**
- f. Proposed Action: The State, through DHCD, should develop a Fair Housing Training Guide for permitting officials and affordable housing developers to ensure everyone involved in the development of affordable housing is aware of their legal rights and obligations under the federal and state Fair Housing Acts. **Status: underway**
- g. Proposed Action: The State should build upon VHFA's Directory of Affordable Rental Housing to create a statewide database of all identified publicly and privately-funded affordable housing units to better serve the identified need, including real-time availability data and detail about accessibility features of available units and any restrictions on residency, e.g. by age of resident. **Status: on-going**
- h. Proposed Action: DHCD and others should continue to encourage municipalities to address the need for affordable housing in Town Plans and modify zoning requirements as needed to facilitate the development of affordable housing. **Status: partially implemented via Act 47 (2023) and Act 181 (2024), and on-going**
- i. Proposed Action: DHCD and others should increase awareness of Vermont's legal prohibition on making zoning decisions based on income or receipt of public assistance. **Status: on-going**
- j. Proposed Action: DHCD should require VCDP applicants to certify their compliance with 24 V.S.A. sec. 4412, which prohibits any zoning bylaws that would have the effect of (a) excluding housing that meets the needs of the population as reflected in the municipal plan, (b) excluding mobile homes, modular housing, or prefabricated housing, (c) excluding mobile home parks from the municipality, (d) excluding multiunit or multifamily dwellings from the municipality; (e) excluding accessory dwelling units from areas zoned for single family dwellings; and (f) excluding residential care homes or group homes from areas zoned for single family dwellings. **Status: implemented**
- k. DHCD should require VCDP applicants to explain how their Town Plan supports efforts to affirmatively further fair housing. **Status: Implemented**

Impediment 2. The State's supply of affordable housing that is accessible to persons with disabilities is inadequate.

- a. Proposed Action: The State should promote the development of training for architects and interior designers regarding compliance with the State's accessibility standards for residential construction (20 VSA sec. 2907) as well as HUD's Fair Housing Design Manual. **Status: Not yet begun**
- b. Proposed Action: The Vermont Human Rights Commission should work with the





New England ADA Center, the Department of Fire Safety, and others to develop an inspection protocol and appropriate training for compliance with the accessibility standards for residential construction. **Status: Not yet begun**

- c. Proposed Action: The State should continue to provide funding to VCIL for its Home Access Program. This will enable VCIL to maintain its efforts to keep persons with disabilities housed in accessible units. **Status: on-going**

Impediment 3. Discrimination based on disability, familial status (e.g. presence of minors), and other protected categories continues to impact fair housing choice in Vermont.

- a. Proposed Action: The Fair Housing Committee of the Vermont Housing Council (now the Vermont Housing and Homelessness Council) should collaborate to develop education and outreach regarding Fair Housing targeted at landlords and condominium associations. **Status: on-going**
- b. Proposed Action: The Fair Housing Committee should work with local television stations to produce and promote Public Service Announcements to educate the public on Reasonable Accommodations and Reasonable Modification, to combat discrimination based on disability. **Status: Not yet begun**
- c. Proposed Action: VHCB should continue to require Fair Housing training for recipients of HOME funds. **Status: Implemented**
- d. Proposed Action: Vermont Legal Aid or others should continue testing for discrimination in rental and other housing, because often people may not realize they are victims of discrimination or may not complain. If possible, testing should include State-protected classes, such as receipt of public benefits, as well as federally protected classes. **Status: on-going**

Impediment 4. There continue to be barriers that make it difficult for minority households and new Americans to become homeowners.

- a. Proposed Action: The State, local units of government, fair housing advocates, certified housing counselors, and financial lenders should continue their work to increase home ownership among minorities, residents of LMI census tracts, and LMI residents through methods including:
  - i. Continuing to expand sustainable home ownership opportunities through financial literacy education, including credit counseling and pre- and post-home purchase education;
  - ii. Providing lending, credit, and banking services in LMI census tracts and minority census tracts; and





iii. Continuing marketing and outreach efforts of affordable mortgage products that are targeted for residents of LMI census tracts, LMI residents, and minorities. **Status: Ongoing**

b. Proposed Action: DHCD should encourage Homeownership Centers to target outreach to minority groups, perhaps making connections with organizations such as NAACP, Refugee Resettlement, and other groups that represent or work with members of protected classes. **Status: Ongoing**

c. Proposed Action: The Fair Housing Committee should work with the Vermont Association of Realtors to encourage the inclusion of an affirmative marketing statement in all real estate marketing. **Status: Not yet begun**

Impediment 5. Members of the protected classes should be more fully represented on State boards and commissions dealing with housing issues.

a. Proposed Action: The State should ensure that its outreach efforts in making gubernatorial appointments to boards and commissions includes a directed effort to solicit applications from members of classes protected by the federal and state Fair Housing Acts. **Status: on-going**

Impediment 6. Lack of public transit service outside higher-density, developed areas limits housing choice, especially for low income Vermonters, including a disproportionate number of those in protected classes.

a. Proposed Action: Identify opportunities for the development of medium density affordable family housing along existing transit routes. Collaborate with VTrans and public transportation providers throughout the State to serve these areas with public transit. **Status: on-going**

Impediment 7. Underemployment and lack of jobs that pay a livable wage limit housing choices.

a. Proposed Action: The Fair Housing Committee should continue to support a variety of anti-poverty and economic development initiatives, including increases to the minimum wage. **Status: Not yet begun**

Vermont is currently undertaking a new and comprehensive Analysis of Impediments with a targeted date of publication in late 2024 or early 2025. This AI will be released to synch with the timing of Vermont's Consolidated Plan. This will allow the two processes to inform one another and to ensure Vermont has the most up-to-date information for future program planning. Public outreach for the 2024 AI is ongoing and includes in-person information gathering and dissemination programming at public libraries throughout the State, digital surveys and outreach, and targeted outreach to partner organizations serving vulnerable and under-served communities and individuals.



## CR-40 - Monitoring 91.220 and 91.230

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

The DHCD continues to follow policies and procedures for meeting grant requirements; uses sound accounting and financial procedures; attends HUD-sponsored training sessions; consults with HUD representatives on technical questions; and utilizes information from public input.

Risk assessment analyses have been enhanced to include award conditions to provide technical assistance and ensure adequate subrecipient monitoring occurs by the grantees.

DHCD takes a risk-based monitoring approach that is based on such factors as size of award; first time receiving an award; complexity of project; staff turnover; past performance; outstanding or delinquent reports; and one or more audit findings/internal control issues regarding program performance or compliance. VCDP Staff will schedule a Post-Award Technical Assistance meeting with each grantee to review specific risk factors as identified in the application review process. Following the Post-Award meeting each Implementation grant will then receive a project specific virtual/on-site monitoring visit with the grantee, subgrantee, and other relevant stakeholders to review the ongoing compliance of the project. AThis project specific monitoring will occur at least once during the life of the grant and sometimes twice depending on the identified risk factors and project complexity

Additionally, all CDBG Projects are monitored throughout the program year through the review of regularly submitted progress reports and detailed auditing of VCDP expenses and invoice as part of our requisition process. Prior to closing out the grant, all grants receive a final desk audit by VCDP program staff before a Certificate of Program Completion is issued.

DHCD staff continue to conduct virtual monitoring during FY23 for cost and time efficiencies. Onsite monitoring will be incorporated on a per project basis for FY24. Below is the current virtual monitoring process:

- An Email is sent to all parties (Grantee, Sub Grantee, Administrator) associated with the Grant to schedule the Virtual Meeting- the Virtual Meeting is set up in Microsoft Teams, but Zoom has also been utilized.
- Once the date of the Virtual Monitoring is set – the Formal Scheduling letter is sent to all parties and the Onsite Monitoring Report (OSMR) is opened in GEARS, our online Grants Management System.



- Once the formal date & letter are sent – a “Pre-Monitoring” meeting may be set up – the purpose of this meeting is to organize and set expectations – who is to provide what supporting documentation is to be provided. The Pre-Meeting is normally performed 3-5 days before the actual meeting and takes up to 30 to 45 minutes depending on the familiarity of the parties and the complexity of the Grant.
- In lieu of being able to see the municipalities employment posters at the office – photos are requested & provided.
- Sub Grantee provides photos or videos of the project, in lieu of an actual walk through of the project.
- The Virtual Meeting is scheduled for 2 hours. During this process the items in the OSMR that pertain to the Municipality are reviewed first to allow the Municipalities to sign off the meeting earlier if necessary.
- Supporting documentation is uploaded into GEARS, for Record keeping. Items too large are kept electronically in GMS files.
- Monitoring also includes review of Progress Reports, Requisitions, Environmental Review, Procurement, Contracts, Labor Standards, Davis-Bacon, Section 3, Financial Management, and including any conditions to be met during or upon completion of the project.
- Each section of the OSMR is reviewed if questions or items are not readily available – the Grantee & Sub-Grantee have 5 days from the day of the scheduled Monitoring to provide the necessary data or materials. A follow up email is sent to all parties to reiterate items – question clarification or missing items.
- A detailed monitoring report is then uploaded into GEARS and shared with the Grantee & Sub-Grantee outlining Satisfactory Performance, Areas of Concern, and any Findings that require follow up. Grantees and Sub-Grantees are then provided no more than 30-days to respond and provided any required follow up.

### **Minority Business Enterprise**

The Vermont Community Development Program requires that each municipality that has received VCDP funding adopt a policy of the Code of Ethics for Administration of the VCDP, in which every effort will be made to actively recruit woman-owned or minority-owned businesses.

The grantee is required to include language in the publication notices for requests for proposals that encourage women-owned and minority-owned businesses to apply. In addition, the Women Business Owners Network is contacted for referrals.

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proposals that encourage women-owned and minority-owned businesses to apply. In addition, the Women Business Owners Network is contacted for referrals.

This information is tracked by the VCDP through the annual Progress Reports that require the grantee to report the ethnicity and gender of the contractors used on a particular job. Of the 112 contracts executed for grants funded during the 2023 Program Year that totaled \$51,990,834 there were:

- 0 women-owned business contracts reported
- 3 Section 3 businesses, totaling \$2,798,653

Likewise, as part of the CDBG-CV Sole Proprietor Program there was special outreach to Women-owned and Minority Businesses to engage them to participate in seeking technical assistance.

The Vermont Housing & Conservation Board (VHCB) administers the HOME and HTF programs in Vermont. This administration includes monitoring of projects and grantees. Properties are inspected regularly according to HUD requirements, and occupancy data is collected according to established guidelines. VHCB provides operational support to the State's non-profit housing development organizations, most of whom have projects utilizing HOME, HTF, and other federal sources. This support includes monitoring of the financial and operational status of the groups, and the provision of direct assistance when required. Through this process VHCB is able to evaluate the risks associated with organizations and individual projects to identify them for more intense monitoring.

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

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

In efforts to provide as many Vermont citizens as possible our report, the following advertisement was placed in the in the following daily newspapers on September 12, 2024, in English, French and Spanish: Bennington Banner, Caledonia Record, Rutland Herald, St. Albans Messenger, Seven Days, and the Times-Argus.

On September 12, 2024, it was emailed out to Vermont's municipal selectboards and municipal officials to share with their local residents including minorities, non-English speaking persons and people with disabilities population as well as public housing authorities to share with their tenants, with a comment period acceptable through September 27, 2024.

The draft was posted to our department's website on September 12, 2024, with a comment period acceptable through September 27, 2024.

#### **Seeking Comment on 2023 Consolidated Annual Performance and Evaluation Report (CAPER) to HUD**



The report is due to the U. S. Department of Housing and Urban Development (HUD) each year by September 30. Department of Housing and Community Development (DHCD) staff have written the 2024 report. The report is in the format required by HUD. The report includes activity from July 1, 2023, to June 30, 2024.

The report includes the following federal programs:

- Community Development Block Grant (CDBG)
- Community Development Block Grant CARES Act (CDBG-CV)
- HOME Investment Partnership Program (HOME)
- Housing Trust Fund (HTF)
- Emergency Solutions Grant Program (ESG); and
- Emergency Solutions Grant Program CARES Act (ESG-CV).

To learn more about the CAPER go to DHCD's website:

<http://accd.vermont.gov/housing/plans-data-rules/hud>. The DRAFT CAPER report will be available on September 12, 2024, on the website.

Send questions or comments to Cindy Blondin at [Cindy.Blondin@vermont.gov](mailto:Cindy.Blondin@vermont.gov). or call 802-828-5219 or toll free at 1-866-933-6249. Written comments are due by September 27, 2024, at 4:30 pm.

Mail to DHCD, 1 National Life Drive, Montpelier, VT 05620-0501, ATTN: Cindy Blondin.

**Comments:**



## CR-45 - CDBG 91.520(c)

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

Due to rising construction costs and supply demands the maximum award amount for public facility grants was increased for FY24 to \$1,000,000 from \$500,000.

Due to rising construction costs and supply demands the maximum award amount for accessibility modification grants was increased for FY23 to \$150,000.

Due to Vermont's increased poverty rate and growing homeless population, the state continues to require non-profit housing developers to set aside 15% of their units in their housing portfolio for preventing homelessness which will likely increase the numbers of homeless individuals being served.

CDBG program intends to continue to hold the option of attending virtually or in person for greater flexibility and ease for board members and grantees.

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

No

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



## CR-50 - HOME 24 CFR 91.520(d)

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

Please list those projects that should have been inspected on-site this program year based upon the schedule in 24 CFR §92.504(d). Indicate which of these were inspected and a summary of issues that were detected during the inspection. For those that were not inspected, please indicate the reason and how you will remedy the situation.

VHCB HOME Program staff or qualified consultants perform inspections of HOME projects during their affordability periods. These are completed on a three-year schedule as outlined in the HOME Program Regulations, although problematic properties are inspected more often. All HOME (and HTF) projects scheduled to be inspected this year were completed. Attached to this report is a list of property inspections conducted during the reporting period along with information about outcomes and follow-up if necessary.

### **Provide an assessment of the jurisdiction's affirmative marketing actions for HOME units. 24 CFR 91.520(e) and 24 CFR 92.351(a)**

The Vermont Housing & Conservation Board (VHCB) has an Affirmative Marketing Policy outlining the procedures and requirements for projects with 5 or more HOME assisted units. Compliance with this policy is a standard condition of all HOME awards, and grantees are required to submit their Affirmative Marketing Plans to VHCB staff for review and approval prior to project closing. Grantees are required to display the Equal Housing Opportunity poster and incorporate the Equal Housing Opportunity logo in its letterhead, press releases, and advertisements. Also, Grantees are required to contact social service agencies before filling vacancies during the affordability period. Income and race information for households occupying HOME units in projects closed out during the report period is included in this report.

As a condition of their awards, grantee staff are required to attend a Fair Housing Training at least every three years. Documentation of attendance at such training is collected from grantees. The Fair Housing Project of the Champlain Valley Office of Economic Opportunity (CVOEO) offers free on-site fair housing training sessions that many grantees take advantage of.

As indicated in CR-20, grantees have successfully marketed HOME units to households in the lowest income category and to special needs populations, priorities identified in the Consolidated Plan. Projects completed include those targeting households with incomes below 30% of median income, service supported housing for seniors, and accessible units for persons with disabilities.



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

No program income

**Describe other actions taken to foster and maintain affordable housing. 24 CFR 91.220(k) (STATES ONLY: Including the coordination of LIHTC with the development of affordable housing). 24 CFR 91.320(j)**

The State makes available incentives for non-profit and for-profit entities to develop affordable housing. Incentives include capacity building grants, low-interest loans, and low-income housing tax credits.

**Coordination of Low-Income Housing Tax Credits (LIHTC) with Affordable Housing Development**

The State of Vermont makes LIHTC allocations in accordance with an approved Qualified Allocation Plan (QAP). By Executive Order, the Vermont Housing Finance Agency (VHFA) is designated the allocating agency for the program.

All LIHTC recipients are required to execute and record a Housing Subsidy Covenant approved by VHFA. Eligible applicants in the LIHTC program include nonprofit and for-profit developers who form partnerships with private investors many of which are banks doing business in Vermont. In many cases, LIHTC projects are also dependent on other federal and state resources which increase the state's ability to ensure affordability to very low and low-income Vermonters beyond the rent and occupancy restrictions imposed by U.S. tax laws that set the parameters of the tax credit program.





## CR-56 - HTF 91.520(h)

**Describe the extent to which the grantee complied with its approved HTF allocation plan and the requirements of 24 CFR part 93.**

The Vermont Housing & Conservation Board (VHCB) administers the HTF program in Vermont. VHCB has fully complied with all provisions of our approved HTF Allocation Plan and all of the requirements of 24 CFR Part 93. Four (4) multi-family rental projects were completed this year utilizing HTF funding. The projects were located in the towns of Brattleboro, Bellows Falls, West Burke, and Rutland, Vermont. All HTF-designated units in these properties are occupied and serve households with incomes below 30% AMI.

Tenure Type	0 – 30% AMI	0% of 30+ to poverty line (when poverty line is higher than 30% AMI)	% of the higher of 30+ AMI or poverty line to 50% AMI	Total Occupied Units	Units Completed, Not Occupied	Total Completed Units
Rental	13	0	0	13	0	13
Homebuyer	0	0	0	0	0	0

**Table 15 - CR-56 HTF Units in HTF activities completed during the period**



# CR-58 – Section 3

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

Total Labor Hours	CDBG	HOME	ESG	HOPWA	HTF
Total Number of Activities	7	6	0	0	4
Total Labor Hours	203,678	232,827			109,197
Total Section 3 Worker Hours	58,721	81,984			49,230
Total Targeted Section 3 Worker Hours	10,560	10,750			11,570

Table 13 – Total Labor Hours

Qualitative Efforts - Number of Activities by Program	CDBG	HOME	ESG	HOPWA	HTF
Outreach efforts to generate job applicants who are Public Housing Targeted Workers	2				
Outreach efforts to generate job applicants who are Other Funding Targeted Workers.	2	3			1
Direct, on-the job training (including apprenticeships).	2	3			2
Indirect training such as arranging for, contracting for, or paying tuition for, off-site training.	1	2			1
Technical assistance to help Section 3 workers compete for jobs (e.g., resume assistance, coaching).					
Outreach efforts to identify and secure bids from Section 3 business concerns.	4	3			
Technical assistance to help Section 3 business concerns understand and bid on contracts.	1	2			
Division of contracts into smaller jobs to facilitate participation by Section 3 business concerns.	1	2			
Provided or connected residents with assistance in seeking employment including: drafting resumes, preparing for interviews, finding job opportunities, connecting residents to job placement services.					
Held one or more job fairs.	2	3			1
Provided or connected residents with supportive services that can provide direct services or referrals.					
Provided or connected residents with supportive services that provide one or more of the following: work readiness health screenings, interview clothing, uniforms, test fees, transportation.					
Assisted residents with finding childcare.					
Assisted residents to apply for or attend community college or a four year educational institution.					
Assisted residents to apply for or attend vocational/technical training.	1	1			
Assisted residents to obtain financial literacy training and/or coaching.					
Bonding assistance, guaranties, or other efforts to support viable bids from Section 3 business concerns.	1	1			
Provided or connected residents with training on computer use or online technologies.	1	1			
Promoting the use of a business registry designed to create opportunities for disadvantaged and small businesses.					
Outreach, engagement, or referrals with the state one-stop system, as designed in Section 121(e)(2) of the Workforce Innovation and Opportunity Act.					
Other.	2	2			1

Table 14 – Qualitative Efforts - Number of Activities by Program



## **Narrative**

This year for CDBG there were seven activities that reported Section 3 hours. The grand total of all the hours worked on projects met each of the benchmarks for Section 3 workers and Targeted workers this year. The two contractors under “Other” summary of efforts indicated the Contractor provided training about Section 3 and the benefits of hiring Section 3 workers to the community.



# CR-60 - ESG 91.520(g) (ESG Recipients only)

## ESG Supplement to the CAPER in *e-snaps*

### For Paperwork Reduction Act

#### 1. Recipient Information—All Recipients Complete

##### Basic Grant Information

Recipient Name	VERMONT
Organizational DUNS Number	809376288
UEI	
EIN/TIN Number	036000264
Identify the Field Office	BOSTON
Identify CoC(s) in which the recipient or subrecipient(s) will provide ESG assistance	Vermont Balance of State CoC

##### ESG Contact Name

Prefix	Ms
First Name	Ari
Middle Name	L
Last Name	Kisler
Suffix	
Title	Community Services Program Manager

##### ESG Contact Address

Street Address 1	280 State Drive, NOB2 North
Street Address 2	
City	Waterbury
State	VT
ZIP Code	05671-1801
Phone Number	8027609872
Extension	
Fax Number	
Email Address	ari.kisler@vermont.gov

##### ESG Secondary Contact

Prefix	Ms
First Name	Candace
Last Name	Elmquist
Suffix	
Title	Financial Director IV



**Phone Number** 8022419056  
**Extension**  
**Email Address** candace.elmquist@vermont.gov

**2. Reporting Period—All Recipients Complete**

**Program Year Start Date** 07/01/2022  
**Program Year End Date** 06/30/2023

**3a. Subrecipient Form – Complete one form for each subrecipient**

**Subrecipient or Contractor Name:** PAVE  
**City:** Bennington  
**State:** VT  
**Zip Code:** ,  
**DUNS Number:**  
**UEI:**  
**Is subrecipient a victim services provider:** Y  
**Subrecipient Organization Type:** Other Non-Profit Organization  
**ESG Subgrant or Contract Award Amount:** 30649

**Subrecipient or Contractor Name:** Vermont Network Against Domestic and Sexual Violence  
**City:** Montpelier  
**State:** VT  
**Zip Code:** ,  
**DUNS Number:**  
**UEI:**  
**Is subrecipient a victim services provider:** Y  
**Subrecipient Organization Type:** Other Non-Profit Organization  
**ESG Subgrant or Contract Award Amount:** 21332

**Subrecipient or Contractor Name:** CVOEO  
**City:** Burlington  
**State:** VT  
**Zip Code:** 05401, 4881  
**DUNS Number:**  
**UEI:**  
**Is subrecipient a victim services provider:** N  
**Subrecipient Organization Type:** Other Non-Profit Organization  
**ESG Subgrant or Contract Award Amount:** 374916



**Subrecipient or Contractor Name:** Institute for Community Alliances  
**City:** Des Moines  
**State:** VT  
**Zip Code:** 50314, 2527  
**DUNS Number:** 149341732  
**UEI:**  
**Is subrecipient a victim services provider:** N  
**Subrecipient Organization Type:** Other Non-Profit Organization  
**ESG Subgrant or Contract Award Amount:** 211165

## CR-65 - Persons Assisted

*\*\*\*The SAGE report will be attached to the final report to HUD\*\*\**

## CR-70 – ESG 91.520(g) - Assistance Provided and Outcomes

*\*\*\* The SAGE report will be attached to the final report to HUD \*\*\**

## CR-75 – Expenditures

*\*\*\* The SAGE report will be attached to the final report to HUD\*\*\**