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2022–2023

CONSOLIDATED ANNUAL PERFORMANCE AND EVALUATION REPORT (CAPER)

OCTOBER 2023

CR-05 - GOALS AND OUTCOMES

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

The City of Columbus, Georgia has prepared its Program Year 2022 (PY2022) Consolidated Annual Performance Evaluation Report (CAPER) under the federal regulations found in 24 CFR 570. The United States Department of Housing and Urban Development (HUD) provided the following grants to the city to address the needs of low-to moderate income persons in the community. This report informs the public of progress that the City made using Community Development Block Grant (CDBG), HOME Investment Partnerships (HOME), Community Development Block Grants - Coronavirus (CDBG-CV), and Community Development Block Grants – Coronavirus Round 3 (CDBG-CV3) funding.

The PY2022 CAPER covers the period from July 1, 2022 – June 30, 2023. It also provides a detailed description of the City’s use of HUD funding and gives an account of the City’s progress in reaching its strategic goals outlined in the Program Year 2021-2025 (PY2021-2025) Consolidated Plan and its Program Year 2022 (PY2022) Action Plan.

The City of Columbus collaborated with non-profit organizations and other entities to ensure that the city could target their most vulnerable populations. These activities included a wide range of services and programs such as affordable housing, facility and infrastructure improvements, operational support for non-profits, emergency housing, and supportive services for the homeless.

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
Blight Removal	Affordable Housing	CDBG: \$13,218	Buildings Demolished	Buildings	40	1	2.5%	0	1	N/A
COVID-19 Response	COVID-19 Response	CDBG-CV: \$108,000	Businesses Assisted	Businesses Assisted	N/A	27	N/A	N/A	27	N/A
COVID-19 Response	COVID-19 Response	CDBG-CV: \$896,155	Public Service Activities Other than Low/Moderate Income Housing Benefit	Persons Assisted	N/A	27,535	N/A	N/A	27,535	N/A
COVID-19 Response	COVID-19 Response	CDBG-CV: \$78,924	Program Administration	Other	0	0	N/A	0	0	N/A
Expansion of Affordable Housing Supply	Affordable Housing	HOME: \$238,653	Rental Units Constructed	Household Housing Unit	5	0	0%	1	0	0.0%
Expansion of Affordable Housing Supply	Affordable Housing	HOME: \$5,395	Downpayment Assistance	Household Housing Unit	N/A	1	N/A	N/A	1	N/A
Expansion of Affordable Housing Supply	Affordable Housing	CDBG: \$2,583	Other (Property Disposition)	Other	1	7	N/A	1	7	700%
Expansion of Affordable Housing Supply	Affordable Housing	HOME: \$78,463	Tenant-Based Rental Assistance	Households Assisted	0	17	N/A	0	17	N/A

Fair Housing	Fair Housing	CDBG: \$0	Public Service Activities other than Low/Moderate Income Housing Benefit	Persons Assisted	260	0	0.0%	0	0	N/A
Housing Rehabilitation	Affordable Housing	CDBG: \$152,842	Homeowner Housing Rehabilitated	Household Housing Unit	120	10	8.3%	0	4	N/A
Infrastructure and Public Facility Improvements	Non-Housing Community Development	CDBG: \$0	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	Persons Assisted	9590	5730	59.75%	6329	5730	90.54%
Program Administration	Program Administration	CDBG: \$284,932 HOME: \$160,555	Other	Other	0	0	N/A	0	0	N/A
Public Services	Homeless Non-Homeless Special Needs Non-Housing Community Development	CDBG: \$294,203	Public Service Activities Other than Low/Moderate Income Housing Benefit	Persons Assisted	13580	0	0.0%	2,716	28,735	1058.0%
Public Services	Homeless Non-Homeless Special Needs Non-Housing Community Development	CDBG: \$0	Businesses assisted	Businesses Assisted	5	0	0.0%	1	0	0.0%

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

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

Federal CDBG funds are intended to provide low-to-moderate income households with viable communities, including decent housing, a suitable living environment, and expanded economic opportunities. Eligible activities include community facilities and improvements, housing rehabilitation and preservation, affordable housing development activities, public services, economic development, planning, and administration.

The activities undertaken by the City of Columbus are consistent with the documented priorities established in the Consolidated Plan. The priorities, goals, and objectives identified are designed to assist lower income residents needing housing, jobs, and services.

CR-10 - Racial and Ethnic composition of families assisted

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

	CDBG	HOME
White	17,110	2
Black or African American	26,210	5
Asian	97	0
American Indian or American Native	86	0
Native Hawaiian or Other Pacific Islander	83	0
Other	3,942	0
Total	47,528	7
Hispanic	3,904	0
Not Hispanic	43,624	0

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

Narrative

The chart above shows the total beneficiaries by race and ethnicity directly assisted with HUD funding over the 2022-2023 program year. Please also note that race and ethnicity numbers are dependent upon self-reported data; therefore, race and ethnicity may not align equally. Figures in the HOME column refer to households, not individuals; the race is the race self-reported by the householder.

As required by HUD, the City of Columbus and its subrecipients follow the Affirmative Marketing Rules. As such, all recipients of HOME funds are required to follow the affirmative marketing requirements. All printed materials are designed to inform the public, owners, or potential tenants interested in participating in the HOME Program. This includes a statement regarding the Columbus Consolidated

Government's Affirmative Marketing Plan as well as the applicable fair housing laws. This information is included in all media released and/or reports informing the public about the HOME Program. All newspaper and other media announcements, as well as any printed materials, include the Equal Housing Opportunity logo, slogan, or statement. Fair Housing Posters are displayed in the offices of all of the City's subrecipients.

To market and publicize various housing programs that are available to the public, all of the programs are advertised via the City's website at: <http://www.columbusga.org/CommunityReinvestment/> and on the City's social media accounts.

Additionally, publicity for City-funded housing programs is available on the websites of some of the City's subrecipients, including:

- NeighborWorks at <http://www.nwcolumbus.org>,
- Wynnton Neighborhood Housing at <http://www.wyntonnhousing.org>
- Open Door Community Housing at <http://www.opendoorcommunityhouse.org>

Federal funds were used to help residents at or below 80% of the area median income. Efforts continue to include the dissemination of information to various minority publications/media to increase awareness among minority populations. Housing events continue to be held throughout the community, which provide outreach to the minority population. The Community Reinvestment Department continues its membership on the Hispanic Outreach Committee, which consists of various community organizations that put activities together that provide information about programs and services to the Hispanic Community.

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	\$1,633,453	\$1,134,561.84
HOME	public - federal	\$1,072,086	\$954,745.33

Table 3 - Resources Made Available

Narrative

In the 2022 program year, the City of Columbus received new CDBG and HOME funds in the amounts indicated in the table above and dispersed a total of \$ \$2,089,307.17 between the two programs. Both the CDBG and HOME programs include balances of grant funds remaining from prior years and those older funds are expended first, before the new grant funding awarded to the City for PY 2022.

Identify the geographic distribution and location of investments

Target Area	Planned Percentage of Allocation	Actual Percentage of Allocation	Narrative Description
Citywide	80%	100%	The Citywide target area encompasses the entirety of the City of Columbus, allowing the City to direct CDBG and HOME funds to eligible activities throughout the city.
South Columbus NRSA	20%	0%	The City is working to identify a Community Based Development Organization (CBDO) and grow its internal technical capacity in order to promote revitalization within the new South Columbus NRSA.

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

The City of Columbus allocated 100% in available resources for citywide projects. Priority CDBG funding areas include areas where the percentage of low-to-moderate income persons is 51% or higher. The Consolidated Plan defines “area of minority concentration” and “area of low-income concentration” as those census tracts that have concentrations of minority populations or low-income populations, respectively, statistically and significantly larger than the minority or low-income population for the City as a whole.

The South Columbus NRSA is a smaller area within the city limits, which is home to approximately 10.8% of the city’s total population. An estimated 72% of the residents in the South Columbus NRSA have low or moderate incomes. Currently, the City is looking for Community Based Development Organizations (CBDOs) to grow their internal technical capacity. Having CBDOs engaged in work within a NRSA opens further funding flexibilities and will help maximize the revitalization efforts concentrated in South Columbus.

The City utilizes HOME and CDBG funds throughout the jurisdiction to serve low-to-moderate income persons. A portion of HOME and CDBG funds is used for the rehabilitation and renovation of single-family homes to improve the housing conditions within those neighborhoods. This method of allocation will enable the City to serve the most disadvantaged residents given the limited funding available.

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.

The nonprofit organizations receiving CDBG and/or HOME funds from the City typically have additional financial capacity through foundations and fundraising campaigns. In addition, the City encourages applicants and subrecipients to seek other public and private resources that address the needs and goals identified in the Consolidated Plan. Federal funds provide these organizations with the opportunity to expand their services to benefit low-to- moderate income persons. The City's HOME funds are typically used as gap financing, which allows for the leveraging of other funds from a variety of financing sources to make significant affordable housing investments. For CDBG funds, no match is required, but CDBG funds are often used in tandem with other funding sources, allowing other sources to be leveraged through our participation.

Jurisdictions participating in the HOME program must contribute no less than 25 cents for each dollar of HOME funds spent on affordable housing. This contribution is called the HOME match requirement and the City meets it by requiring its HOME subrecipients to log outside, non-federal funding invested alongside HOME funds in eligible projects, as well as through an accumulation of excess match carried over from prior years. Subrecipient match contributions are verified through a report submitted to the City on an annual basis. In this regard, the City's partnership with nonprofit developers is enhanced and the non-federal matching contributions add to the resources available for HOME-assisted or HOME-eligible projects, extending the effectiveness of HOME investments.

As the City expends HOME funds, it incurs a match liability of 25% of the amount drawn; the amount of this match liability must be satisfied by match contributions by the end of each federal fiscal year.

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

Table 5 – Fiscal Year Summary - HOME Match Report

Match Contribution for the Federal Fiscal Year - TBD								
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

Table 6 – Match Contribution for the Federal Fiscal Year

HOME MBE/WBE report

Program Income – Enter the program amounts for the reporting period				
Balance on hand at 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 7 – Program Income

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

Table 8 - Minority Business and Women Business Enterprises

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						
	Total	Minority Property Owners				White Non-Hispanic
		Alaskan Native or American Indian	Asian or Pacific Islander	Black Non-Hispanic	Hispanic	
Number	0	0	0	0	0	0
Dollar Amount	0	0	0	0	0	0

Table 9 – Minority Owners of Rental Property

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						
Parcels Acquired		0		0		
Businesses Displaced		0		0		
Nonprofit Organizations Displaced		0		0		
Households Temporarily Relocated, not Displaced		0		0		
Households Displaced	Total	Minority Property Enterprises				White Non-Hispanic
		Alaskan Native or American Indian	Asian or Pacific Islander	Black Non-Hispanic	Hispanic	
Number	0	0	0	0	0	0
Cost	0	0	0	0	0	0

Table 10 – Relocation and Real Property Acquisition

CR-20 - Affordable Housing 91.520(b)

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

	One-Year Goal	Actual
Number of Homeless households to be provided affordable housing units	0	4
Number of Non-Homeless households to be provided affordable housing units	6	22
Number of Special-Needs households to be provided affordable housing units	0	0
Total	6	26

Table 11 – Number of Households

	One-Year Goal	Actual
Number of households supported through Rental Assistance	0	4
Number of households supported through The Production of New Units	6	3
Number of households supported through Rehab of Existing Units	0	19
Number of households supported through Acquisition of Existing Units	0	0
Total	6	26

Table 12 – Number of Households Supported

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

The City supported 4 new households through tenant-based rental assistance but had not set a goal for the program in the 2022 Action Plan. Three new homes were constructed and sold to income-qualifying homebuyers, which falls short of the City's goal for this program. The shortfall is due to limited CHDO funding availability and rising construction costs. Although the City did not set a numeric goal for housing rehabilitation in the 2022 Action Plan, there were 19 households assisted through CDBG-funded programs offered by Habitat for Humanity and Access 2 Independence.

Discuss how these outcomes will impact future annual action plans.

Due to lengthy construction timelines, the number of homeowner housing units added are usually products of prior year resources. As such, the one-year goals will likely be realized in future CAPER

reports and a comparison of production to the 5-year Consolidated Plan goal may provide a better comparison. Based on the projects completed to date and currently funded programs the City is on track to meet or exceed the 5-year goals set in the Consolidated Plan for the provision of affordable housing units. Although the City currently works with many community-based organizations, the primary impediment to the City's ability to meet underserved needs is the limited amount of entitlement funding and the fact that most nonprofit organizations operate on shoestring budgets. The City continues to face a reduction of funding at the local, state, and federal levels which will significantly limit the resources available to address the shortfall of affordable housing units.

The City of Columbus will provide additional information on program changes that are currently in development as the City continues to determine the needs of residents in future Action Plans. Subrecipients will be advised to consider market conditions and the availability of rental and permanent affordable housing when proposing annual project beneficiary goals.

Lastly, the Community Reinvestment Department will attempt to share its funding more broadly in the future, by making additional contacts with non-profit and private affordable housing developers during its open application cycle. Further analysis of mitigating barriers to affordable rental housing will occur during the PY 2023 Housing Needs Assessment, conducted every year before developing the annual action plan.

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	CDBG-CV Actual	HOME Actual
Extremely Low-income	6,336	6,450	4
Low-income	3,034	2,085	0
Moderate-income	172	312	3
Total	9,542	8,847	7

Table 13 – Number of Households Served

Narrative Information

The City's housing market presents significant obstructions to development of an adequate supply of affordable housing for low to moderate Income individuals and families. Recent loss of major manufacturing employment opportunities, such as (Snyder's-Lance) coupled with rising construction costs has created a significant barrier to affordable housing. Additionally, as of the 2020 Decennial Census, the City of Columbus has moved into the position as the second largest city in the State of Georgia. There are significant geographic and socioeconomic disparities in access to essential community assets. Household income in Columbus differs widely across races and ethnicities, with minority residents likely to earn less.

The City has taken steps to reduce these obstacles and affirmatively further fair housing choice. Some of those steps include allocating CDBG funding for housing rehabilitation activities to preserve existing affordable housing and providing HOME funds for both new construction and housing rehabilitation. The City of Columbus has also provided funding for down-payment assistance, homebuyer education, and fair housing education and outreach. These activities are represented in this CAPER and have continued in the implementation of our most recent Consolidated Plan.

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

As a participant in the local CoC, led by Home for Good, the City is a partner to address homelessness and the priority needs of homeless individuals, families, and homeless subpopulations. Through the CoC, there are three core Street Outreach Providers: the Projects for Assistance in Transition from Homelessness (PATH) team, Columbus Police Department (CPD), and the Homeless Prevention Team.

Street outreach is conducted weekly by CPD, biweekly by PATH, and at random by The Homeless Prevention Team. Each group has a representative that serves on the Mainstream and Outreach Committee (M&O Committee), which meets quarterly to coordinate and get updates on progress being made in key areas. Each group has specific service areas, such as crisis intervention and survival aid but all have the same common goal to refer them to the Coordinated Entry System (211) for intake and individualized services.

Individuals/families can access support services either by self-presenting at most of the shelter facilities or through referrals. Regional emergency shelters refer participants to agencies that will assist them in obtaining mainstream resources. Transitional housing programs generally refer participants and provide the necessary assistance to obtain resources to successfully aid in the transition.

Addressing the emergency shelter and transitional housing needs of homeless persons

Each year, the CoC conducts a Point-in-Time count of the persons residing in emergency shelters and transitional housing facilities, as well as those living unsheltered within the Columbus region. This information is used to understand the emergency and transitional needs of homeless persons so that they can be addressed adequately and efficiently. The CoC has implemented a plan to help emergency shelters better understand the benefits of participating in the count, such as the value of statistical data gathered from the Point-in-Time and Housing Inventory Count processes. This data includes information about homeless clients tracked through the Homeless Management Information System (HMIS) as a result of receiving services from HMIS participating agencies. This system provides information on services to eligible clients by local non-profit organizations in the city. The city annually provides funding that in part helps support the HMIS database to track the effectiveness of service providers.

Using HOME-ARP funding, the City is funding the development of a new non-congregate shelter by the Salvation Army. The City has approved the award of funding and written agreements are in place between the City and Salvation Army. Another \$50,000 of the City's HOME-ARP funding is being used to address homelessness among domestic violence victims.

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

Increasing the amount of permanent and affordable housing with supportive services is key in helping homeless persons make the transition to permanent housing and independent living. The majority of chronically homeless persons have severe mental illness and/or substance abuse issues. As such, they require long-term, affordable housing options that have supplementary supportive services to make a successful transition into residential stability. To continue to increase the rate of placement and retention, the CoC recently completed a Housing Stability Plan that will follow clients in securing permanent housing and Home for Good is hiring a “poverty czar” to lead implementation of the plan. The Chattahoochee Valley Poverty Reduction Coalition has been instrumental in coordinating work across a continuum of agencies and organizations to support poverty-reduction programs, including the poverty czar position. Funding for the position’s first five years has been secured using \$500,000 in HOME-ARP resources and a candidate interview and hiring process is presently underway.

A key component of the CoC’s strategy for ending chronic homelessness is to strategically address issues that most often cause these problems:

- The high prevalence of substance abuse among chronically homeless individuals
- Inadequate education and/or job skills among many homeless persons
- The shortage of affordable housing in the City of Columbus

By placing emphasis on the above issues along with efficient coordination and collaboration with local non-profit agencies the City of Columbus can strategically pivot itself in addressing chronic homelessness. To capitalize on this, the CoC implemented a comprehensive Homeless Prevention Strategy to effectively identify, assess, prevent individuals and families from becoming homeless, and to divert them in a housing crisis from homelessness. The City supports this work by funding the CoC’s Coordinated Entry initiative through a grant of \$80,000 in CDBG public services funding.

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

The City of Columbus recognizes the need for neighborhood-based homelessness prevention programs,

such as a crisis response and stabilization team, a street outreach program, housing search placement specialists, increased employment opportunities that provide temporary rental assistance and other services. The CoC has implemented a cohesive comprehensive system to increase access to employment and mainstream benefits. Through its Coordinated Entry System, client's needs are assessed through its intake process and subsequently connected to the appropriate services and programs. CoC funded programs/projects are required to attend Soar Training, quarterly resource fairs, and job fairs. Additionally, projects are assigned case managers and/or life skills managers that coordinate assistance.

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

Actions taken to address the needs of public housing

The Housing Authority of Columbus, Georgia (HACG) provides publicly supported housing for residents of Columbus. HACG has a Moving To Work (MTW) designation, which allows the housing authority greater flexibility in its use of operating and capital funds and its implementation of policies not typically permitted under HUD regulations. In addition to public housing, the HACG offers rental assistance through the Section-8 Voucher Program.

The HACG's current public housing stock is generally in fair physical condition and well-maintained, however, continued maintenance of these units is cost prohibitive as units begin to age. Through the Rental Assistance Demonstration (RAD) program, public housing agencies are able to leverage public and private debt and equity to reinvest in public housing. Units move to a Section-8 platform with a long-term contract that, by law, must be renewed. This ensures that the units remain permanently affordable to low-to-moderate income households.

The HACG has two large public housing developments that it plans to convert to project based vouchers within 1-3 years. These developments include Warren Williams Homes (182 units) and Elizabeth Canty Homes (249 units). In 2020, the HACG demolished 108 public housing units at Chase Homes under SAC Section 18 demolition approval. All 108 households were relocated through tenant protection vouchers. The site of Chase Homes has been developed into The Banks at Mill Village, a 102-unit mixed income housing development. The public housing units have been replaced with 76 HCV PBV units available to residents earning 50% AMI, 15 LIHTC units for residents at 60% AMI, and 11 market-rate units. Approximately 50 HCV PBV units will also become available at the Warm Springs Senior Village, a new 72-unit mixed income housing development for seniors 62 years of age or older. The HACG is also in the design phase of a new project that was awarded 9% LIHTC called BTW South. This project will consist of 90 units of mixed income housing for seniors 62 years of age and older. This development will have approximately 52 HCV PBV units. At the completion of these RAD conversions, the HACG will consist entirely of project-based and tenant-based vouchers.

HACG's program of RAD conversions is ongoing, pending the allocation of 4% Low Income Housing Tax Credit (LIHTC) bonds by the Georgia Department of Community Affairs. Additionally, the HACG is in an ongoing planning and implementation process regarding modernization and aesthetic improvements to public housing properties. The City of Columbus has allocated HOME-ARP funding to HACG that will be used to support preservation of a limited number of public housing units as "triage units" to temporarily house people from the CoC's coordinated entry list. Through these efforts and others, the City continues to work with HACG to develop and maintain affordable housing.

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

At each of its public housing sites, the HACG has resident councils, security task forces, educational

opportunities, and youth programming. Each of these programs provide resources to improve their economic conditions and quality of living. Additionally, the HACG reserves one spot on its board for a public housing resident and actively encourages residents to participate in planning meetings.

HACG programs include Moving to Work (MTW) created in 2013, that allows for more flexibility in how it uses federal funds. The Family Self-Sufficiency (FSS) program is a voluntary self-sufficiency program that provides participating families the opportunity to identify needs, improve skill sets, work towards life goals, economic independence, and housing self-sufficiency. The FSS program has a program coordinator to assist residents in finding beneficial resources.

Actions taken to provide assistance to troubled PHAs

Not applicable. As a Moving To Work agency, the HACG is not scored through the Public Housing Assessment System (PHAS).

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)

Over the course of the past year, the city and its partners continued to reduce barriers to affordable housing by allocating CDBG funding for housing rehabilitation that will preserve existing affordable housing. Through the Continuing Hope and Home Accessibility programs, elderly households and households that have members with disabilities are provided with essential repairs and modifications. Also, the City provided HOME funds for both new construction and housing rehabilitation. The City continues to budget for fair housing education and outreach on an annual basis.

In order to continue to address and eliminate any potential barriers to affordable housing, the City has identified the following actions:

- 1.) Develop partnerships to build and increase the number of affordable units,
- 2.) Support and coordinate with developers for housing tax credit project applications proposed within the city,
- 3.) Provide homebuyer education, and
- 4.) Make efforts to coordinate the Land Bank Authority of Columbus Georgia for the development of affordable housing units.

In the 2023-2024 program year, the City will begin a review of the housing authority's policies related to the Violence Against Women Act (VAWA) in order to flag any potential barriers to affordable housing and fair housing choice. The City's limited CDBG and HOME funds are the primary impediment to meeting underserved needs. As such, additional public and private resources are fundamental in assisting with implementation of policies and programs.

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

Although the City currently works with many community-based organizations, the primary obstacle to the City's ability to meet underserved needs is the limited amount of entitlement funding and the fact that most nonprofit organizations operate on limited budgets. The City has faced a reduction of funding at the local, state, and federal levels which significantly limits the resources available to address the shortfall of affordable housing units and community needs. Because of this shortfall, the City has shifted its strategy to encourage and promote multifamily affordable housing developments which will leverage and expand affordable housing options for income eligible renter households. Additionally, the City will continue its efforts for affordable housing acquisition and/or rehabilitation. These funds will provide

additional leverage for the acquisition, rehabilitation, and/or resale of homes to income eligible residents, many of whom will be first time homebuyers.

With its 2021-2025 Consolidated Plan, the City established a new Neighborhood Revitalization Strategy Area (NRSA) in South Columbus. Creation of a NRSA allows greater flexibility in the use of Community Development Block Grant funds and bridges together government, civic, private businesses, and non-profit organizations to revitalize distressed communities. The South Columbus NRSA allows CDBG funds to be used in a more flexible manner to help with neighborhood revitalization in neighborhoods where at least 70% of the residents are of low-to-moderate incomes. Through this NRSA designation, some of the most distressed residential neighborhoods in South Columbus with high concentrations of low to moderate income individuals will benefit from revitalization efforts. Currently, the City is looking for Community Based Development Organizations (CBDOs) to grow their internal technical capacity. Having CBDOs engaged in work within a NRSA opens further funding flexibilities and will help maximize the revitalization efforts concentrated in South Columbus. NRSA accomplishments will be reported on in subsequent Annual Action Plans and CAPERs.

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

The City continues to make every effort to protect persons and the environment through compliance of HUD regulations of controlling lead-based paint hazards with housing receiving federal assistance. The City has established partnerships with Habitat for Humanity, Access 2 Independence, and NeighborWorks of Columbus in administering minor home repair and accessibility modifications for income-eligible elderly and disabled individuals with much needed repair, maintenance, weatherization, safety, and beautification of homes.

These programs are required to implement all aspects of HUD's lead-based paint regulations with particular emphasis on properties built prior to 1978. These organizations continue their efforts to reduce lead-based paint hazards on all their rehabilitation projects by providing outreach on the dangers, identification, and reduction of lead-based paint hazards to all program participants.

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

The City of Columbus plays an active role in reducing poverty and expanding economic opportunity for job creation and development. The poverty rate is based on whether a household's income can adequately provide for basic needs, which indicates a strong correlation between the labor market and the poverty rate. Ensuring there are opportunities for those who earn the least is key to reducing the number of families in poverty. Economic development through direct technical and business assistance is the catalyst for the retention and creation of new jobs, subsequently providing opportunities for economic mobility.

For PY 2022, the city promoted economic development through the following means:

- The City has worked to develop a business incubator project in partnership with Columbus Makes It and the Greater Columbus Chamber of Commerce called SartUp Columbus. StartUp Columbus provides individuals of all income levels the opportunity to explore business ideas and accelerate their programs.
- The City continues its partnership with Home for Good, which is the lead agency for the CoC. The CoC has implemented a cohesive comprehensive system to increase access to employment and mainstream benefits. Through its Coordinated Entry System, individuals are assessed through its intake process and subsequently connected to the appropriate services and programs.
- The City's participation in the Chattahoochee Valley Poverty Reduction Coalition adds support to the Coalition's initiatives for driving system-wide change that improves the well-being of local families. Among the Coalition's initiatives is the Jobs for Life program that aims to provide job skills that will help candidates find and keep fulfilling work.
- As discussed previously, the city has established a Neighborhood Revitalization Strategy Area (NRSA) in South Columbus which is helping to provide the City a way to target its CDBG funding resources in economically disadvantaged neighborhoods. Within an NRSA, the City of Columbus can designate comprehensive strategies to address economic development and housing needs in the targeted area. Job creation and retention activities are part of the NRSA designation and strategy.

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

Over the 2022 program year, the City's Community Reinvestment Department made significant investments in training for its staff (many of whom are relatively new in their positions) and in improving policies and procedures as a means to strengthen the functioning of the department and the programs it funds and operates. Since last year, staff have instituted policies and procedures to ensure all programs and operations are guided by written guidelines. These guidelines will help ensure the City's grant-funded programs operate sustainably and in compliance with federal regulations.

Additionally, the City's Community Reinvestment Department has continued to develop Columbus's social service infrastructure by cultivating strong partnerships with local social service agencies and offering informational workshops on topics of interest. It is critical that public and local agencies work cooperatively in executing tasks. The City continues to coordinate amongst its partner agencies to promote a broadly shared understanding of community needs, collaborative and complementary approaches to addressing needs, and responsiveness to changes in conditions.

The City has a Community Development Advisory Council (CDAC) that consists of board members appointed by the mayor and council members to act as the voice of residents per the Citizen Participation Plan. This committee meets throughout the year to provide recommendations on the City's consolidated planning process.

The City continues to work closely with partner agencies and community stakeholders to develop social

response programs based on community need. For example, the Community Reinvestment Department and other City representatives are active members in the CoC board and subcommittees, the 211 response line through the United Way of the Chattahoochee Valley, the Columbus 2025 Initiative for Economic, Community and Workforce Development, and Neighborhood CDBG Programs. CRD has formed a relationship with the City's Planning Department, particularly focused on community engagement. Staff from the Community Reinvestment Department's staff may attend community meetings hosted by the Planning Department to answer community questions and receive community input, even when not directly related to CRD's specific programs. The Department has also been building connections with other City departments (e.g., Engineering, Parks and Recreation, Public Works), helping them understand CDBG and what the grant resources and Community Reinvestment Department can do to support their respective missions. By deepening a culture of proactively engaging these other departments, the City as a whole is better able to provide quality-of-life improvements to its residents in a coordinated way.

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

The City has established several cooperative partnerships and collaborations with public and supportive housing providers, local government, and mental health and social service agencies to address its priority needs and will continue to do so. Examples Include:

Single- and multifamily housing: the City partners with NeighborWorks to coordinate the funding, development, and monitoring of single - family and multifamily housing units funded through the HOME and CDBG programs.

Tenant Based Rental Assistance: the City partners with a local non-profit, Open Door Community House, to manage the HOME tenant-based rental assistance program. This program is prioritized for homeless individuals and households. Support services are offered to all Tenant Based Rental Assistance (TBRA) households through CoC Programs.

Single-family Housing Rehabilitation: the City partners with the Columbus Area Habitat for Humanity and Access 2 Independence to provide minor home repair and accessibility modifications for income eligible elderly and disabled individuals.

Community services: the City is proud of its work with the Chattahoochee Valley Poverty Reduction Coalition. By attending and presenting at the Coalition's meetings and fostering relationships with the Coalition's other members, the City lends its support to the initiative and its programs.

Fair Housing: the City hosts fair housing activities in April to honor Fair Housing Month. Although the pandemic has minimized the amount of celebration that normally occurs, the City took the occasion of Fair Housing Month to rebrand its down payment assistance program as "Sweet Home Columbus" and to announce an increase in the maximum funding provided from \$10,000 to 14,975.

The City provides CDBG funding annually and partners with Home for Good (a local nonprofit homeless provider) who serves as the collaborative applicant for the CoC. Home for Good coordinates several homelessness reduction system-wide strategies involving both public and private agencies such as Coordinated Assessment, Housing First, and Rapid Rehousing through the Continuum of Care.

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

During FY 2022, the City of Columbus stepped up its commitment to community education on fair housing. For example, the City and its partners jointly hosted a highly successful fair housing training and awareness event attended by approximately 70 staff of the Housing Authority of Columbus Georgia. Additionally, the City has placed particular emphasis in the following:

- Continuing outreach within targeted communities at locations such as recreation centers, community/neighborhood centers, and churches,
- Educating elected officials and City department staff responsible for CDBG/HOME funds in their legal obligation to affirmatively further fair housing.
- Targeting education and outreach to landlords who rent a small number of units, as they are likely to be unaware of fair housing laws and their legal responsibilities.
- Ensuring all CRD staff are trained and able to make referrals of housing discrimination complaints to HUD as appropriate.

The City continues its outreach to individuals with limited English proficiency within targeted communities. For example, the Community Reinvestment Department is active on the Hispanic Outreach Committee. The City is currently developing an adequate formal policy for ensuring that persons with limited English proficiency can access its housing and community development services and programs.

To streamline programs such as CDBG and HOME, the City plans to continue hosting an annual HUD Grant Workshop for these programs. This will provide an overview of CDBG and HOME Programs to interested non-profit organizations and affordable housing developers. The workshop will streamline the annual application process and prepare non-profit organizations and affordable housing developers for the City's annual funding application process.

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

Strengthening the City's capacity and planning for subrecipient monitoring was a significant accomplishment in PY 2022. Monitoring policies and procedures have been completely updated and overhauled to ensure compliance with all HUD regulations and guidance and the City's staff has been trained on the new policies. Staff training included training on implementing and conducting a risk analysis. As this is now a new and ongoing process, each year, a risk analysis will be completed on all open activities to evaluate financial capacity, management, planning, and national objectives. Risk analysis scores are averaged to determine which activities require on-site monitoring or a desk audit for federal and local compliance. By the end of PY 2022, City staff had begun conducting on-site monitoring visits as dictated by the risk analysis results. During these monitoring visits, program staff inspect key project components to ensure compliance with grant regulations.

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.

On <<DATE>>, the 2022 CAPER was advertised for public comment in the Columbus Ledger Enquirer. The Community Reinvestment Department distributed the Public Notice to organizations that serve low-to-moderate income persons, minorities, or protected classes throughout the city. The City received public comments over a 15-day period from Monday, September 11, 2023 through Tuesday, September 26, 2023, and held a public hearing on Monday, September 25, 2023. At the time of the initial publication, there were no citizen comments to report. Any future comments will be included in the final report submission to HUD.

CR-45 - CDBG 91.520(c)

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

This CAPER evaluates outcomes from the second year of the City's 2021-2025 Consolidated Plan. As this plan year immediately followed the development of the current Consolidated Plan and evaluation of the data and public input collected as part of that process, the 2022 program year has not varied in any significant way from the City's program objectives at the outset.

During the development of the 2021-2025 Consolidated Plan, a set of priority needs were identified. These priorities include the expansion of affordable housing supply, housing rehabilitation, blight removal, infrastructure and public facility improvements, public services, fair housing, COVID-19 response, and program administration. The Consolidated Plan also contains goals, measurable objectives, and implementation actions for each of the plan's elements. The 2022 program year has not resulted in any significant departures from the program objectives identified in the 2021-2025 Consolidated Plan or the 2022 Annual Action Plan.

Funding for PY 2022 projects was awarded based on the priorities listed above. For the remainder of the City's consolidated plan period, the City of Columbus Community Reinvestment Department staff will continue conducting annual needs assessments to determine if strategic priorities need to be modified.

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

No

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

Not applicable.

CR-50 - HOME 91.520(d)

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

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

While the HOME regulations state that on-site inspections must only be conducted every three years following the initial 12-month post completion inspection, the City of Columbus has chosen to expand on this by requiring our developers and owners to conduct additional in-house inspections. This policy has been adopted into all our written agreements as a means of mitigating potential increased repair and maintenance costs due to negligence or ignorance of issues with rental properties.

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

Complying with 24 CFR Part 92.351, the City of Columbus and its subrecipients follow the Affirmative Marketing Rules. All recipients of HOME funds are required to follow the affirmative marketing requirements. All printed materials designed to inform the public, owners, or potential tenants wishing to participate in the HOME Program include a statement regarding the Columbus Consolidated Government's Affirmative Marketing Plan as well as fair housing laws. This information is included in all media released and/or reports informing the public about the HOME Program. All newspaper and other media announcements, as well as any printed materials, include the Equal Housing Opportunity logo, slogan, or statement. Fair Housing Posters are displayed in the offices of all the City's subrecipients.

To market and publicize various housing programs that are available to the public, all of the programs are advertised via the City's website at <http://www.columbusga.org/CommunityReinvestment/> and social media accounts. The Community Reinvestment Department utilizes Facebook as a social media tool to reach a greater and diverse audience when publicizing its events. The use of social media has resulted in an increase of individuals showing up to public meetings and forums.

The City of Columbus periodically assesses the Affirmative Marketing Policy to determine the efficacy and make any necessary corrective actions. The assessment of the Affirmative Marketing Policy occurs annually when the City evaluates housing programs in its Annual Action Plan.

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

The City did not use any HOME program income for projects in PY 2022.

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

The City of Columbus has continued to identify and build on its partnerships with nonprofit housing organizations and private agencies with the goal of increasing the supply of affordable housing. These have included LIHTC and other developers considering housing projects in the City. The City has also continued to increase housing affordability in Columbus through the homebuyer down payment assistance program, tenant-based rental assistance, Continuing Hope Program (critical repairs and/or installations, including heating and air conditioning systems, roofs, flooring, plumbing, electrical updates and repairs, windows and exterior doors), and the Home Access Program (Americans with Disabilities Act modifications for improved accessibility).

The City will continue to evaluate current HOME Program activities and will be proactive in funding projects which address the affordable housing needs in the City of Columbus.

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	0	0	0	0	0
Total Labor Hours	0	0	0	0	0
Total Section 3 Worker Hours	0	0	0	0	0
Total Targeted Section 3 Worker Hours	0	0	0	0	0

Table 14 – 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	0	0	0	0	0
Outreach efforts to generate job applicants who are Other Funding Targeted Workers.	0	0	0	0	0
Direct, on-the job training (including apprenticeships).	0	0	0	0	0
Indirect training such as arranging for, contracting for, or paying tuition for, off-site training.	0	0	0	0	0
Technical assistance to help Section 3 workers compete for jobs (e.g., resume assistance, coaching).	0	0	0	0	0
Outreach efforts to identify and secure bids from Section 3 business concerns.	0	0	0	0	0
Technical assistance to help Section 3 business concerns understand and bid on contracts.	0	0	0	0	0
Division of contracts into smaller jobs to facilitate participation by Section 3 business concerns.	0	0	0	0	0
Provided or connected residents with assistance in seeking employment including: drafting resumes, preparing for interviews, finding job opportunities, connecting residents to job placement services.	0	0	0	0	0
Held one or more job fairs.	0	0	0	0	0
Provided or connected residents with supportive services that can provide direct services or referrals.	0	0	0	0	0
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.	0	0	0	0	0
Assisted residents with finding childcare.	0	0	0	0	0
Assisted residents to apply for, or attend community college or a four year educational institution.	0	0	0	0	0
Assisted residents to apply for, or attend vocational/technical training.	0	0	0	0	0
Assisted residents to obtain financial literacy training and/or coaching.	0	0	0	0	0

Bonding assistance, guaranties, or other efforts to support viable bids from Section 3 business concerns.	0	0	0	0	0
Provided or connected residents with training on computer use or online technologies.	0	0	0	0	0
Promoting the use of a business registry designed to create opportunities for disadvantaged and small businesses.	0	0	0	0	0
Outreach, engagement, or referrals with the state one-stop system, as designed in Section 121(e)(2) of the Workforce Innovation and Opportunity Act.	0	0	0	0	0
Other	0	0	0	0	0

Table 15 – Qualitative Efforts - Number of Activities by Program

Narrative

N/A