

City of Warwick
Community Development Block Grant Program

Draft
2015-2016 CAPER Report
September 14, 2016

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.

The City of City of Warwick completed the first year of its FY 2015-2019 HUD Consolidated Plan. The City's CDBG funds were used for activities that meet the following CDBG program national objective: benefiting low- and moderate-income (LMI) persons.

The City allocated all of its CDBG public services funds to Eleven (11) subrecipients who provided support services to 2,067 low-income persons in need from July 1, 2015 through June 30, 2014.

The City also allocated CDBG funds to Westbay Community Action for their Home Improvement Program which provide ten (56) income-eligible homeowners with housing rehabilitation grants to minor/emergency to their homes.

The City's Home Improvement Loan Program provided ten (10) income-eligible homeowners with housing rehabilitation loans to rehabilitate and repair their homes.

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
Basic services	Homeless Non-Homeless Special Needs	CDBG: \$	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	1965	558	28.40%	622	558	89.71%
Basic services	Homeless Non-Homeless Special Needs	CDBG: \$	Homeless Person Overnight Shelter	Persons Assisted	0	0		0	0	
CDBG-DR March 2010 Flood	Affordable Housing Non-Housing Community Development Economic Development	CDBG-DR: \$	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	Persons Assisted	6700	0	0.00%	200	0	0.00%
CDBG-DR March 2010 Flood	Affordable Housing Non-Housing Community Development Economic Development	CDBG-DR: \$	Facade treatment/business building rehabilitation	Business	2	0	0.00%			

CDBG-DR March 2010 Flood	Affordable Housing Non-Housing Community Development Economic Development	CDBG- DR: \$	Rental units rehabilitated	Household Housing Unit	5	0	0.00%	1	0	0.00%
CDBG-DR March 2010 Flood	Affordable Housing Non-Housing Community Development Economic Development	CDBG- DR: \$	Homeowner Housing Added	Household Housing Unit	1	0	0.00%			
CDBG-DR March 2010 Flood	Affordable Housing Non-Housing Community Development Economic Development	CDBG- DR: \$	Homeowner Housing Rehabilitated	Household Housing Unit	5	0	0.00%	1	0	0.00%
Commercial Rehabilitation	Non-Housing Community Development	CDBG: \$	Facade treatment/business building rehabilitation	Business	4	0	0.00%	1	0	0.00%
Health Services	Homeless Non-Homeless Special Needs	CDBG: \$	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	275	61	22.18%	50	61	122.00%

Public facility improvements	Non-Housing Community Development	CDBG: \$	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	Persons Assisted	2864	0	0.00%	437	0	0.00%
Public facility improvements	Non-Housing Community Development	CDBG: \$	Rental units rehabilitated	Household Housing Unit	0	0		0	0	
Public facility improvements	Non-Housing Community Development	CDBG: \$	Homeowner Housing Rehabilitated	Household Housing Unit	0	0		0	0	
Public infrastructure improvements	Non-Housing Community Development	CDBG: \$	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	Persons Assisted	7826	0	0.00%	1188	0	0.00%
Residential Rehabilitation	Affordable Housing	CDBG: \$	Rental units constructed	Household Housing Unit	1	0	0.00%			
Residential Rehabilitation	Affordable Housing	CDBG: \$	Rental units rehabilitated	Household Housing Unit	6	8	133.33%	2	8	400.00%
Residential Rehabilitation	Affordable Housing	CDBG: \$	Homeowner Housing Added	Household Housing Unit	2	0	0.00%	1	0	0.00%
Residential Rehabilitation	Affordable Housing	CDBG: \$	Homeowner Housing Rehabilitated	Household Housing Unit	220	68	30.91%	60	68	113.33%

Residential Rehabilitation	Affordable Housing	CDBG: \$	Housing for Homeless added	Household Housing Unit	0	0		0	0	
Residential Rehabilitation	Affordable Housing	CDBG: \$	Housing for People with HIV/AIDS added	Household Housing Unit	0	0		0	0	
Services for Special Needs Populations	Non-Homeless Special Needs	CDBG: \$	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	1195	365	30.54%	311	365	117.36%

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.

CDBG funds were effectively used to complete owner occupied housing rehabilitations, create and maintain affordable rental housing, support the local homeless coalition, and revitalize neighborhood districts through public services, and infrastructure projects.

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
White	3,579
Black or African American	167
Asian	37
American Indian or American Native	20
Native Hawaiian or Other Pacific Islander	1
Total	3,804
Hispanic	172
Not Hispanic	3,632

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

Narrative

The priorities of projects funded by the CDBG are intended to benefit low and moderate income persons. Race and ethnicity information is gathered from census data if the projects are to satisfy area wide Low Moderate Income (LMI), or from the customer intake documentation if the projects are to satisfy limited clientele, housing and public service projects.

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		4,430,000	528,489
Other	N/A	0	
Other	NA	0	

Table 3 – Resources Made Available

Narrative

Identify the geographic distribution and location of investments

Target Area	Planned Percentage of Allocation	Actual Percentage of Allocation	Narrative Description
Apponaug Village	1	1	
Citywide			
East Natick Village		9	
East Natick Village	9	9	
Oakland Beach			
Pontiac Village			
Pontiac Village	9		

Table 4 – Identify the geographic distribution and location of investments

Narrative

There are four target areas identified for CDBG investment, which are the neighborhoods of Apponaug Village, East Natick Village, Oakland Beach, and Pontiac Village. CDBG funds are made specifically in these targeted neighborhoods for infrastructure improvement and public facilities enhancements. In Program Year 2015, \$100,000 was allocated East Natick Village to undertake gateway improvements into the neighborhood.

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.

CDBG funds were used to leverage an additional \$21,926,338 in additional federal, state, local, and private funding. These funds provided additional resources for these projects to reach to greater number of low to moderate income residents.

Public facilities

\$240,000 for Child Inc for Playground Improvements.

\$800,000 for EBC Center Affordable Housing Project

Home Repair

\$10,965,603 for Westbay Community Action Home Repair Program

Public Services Activities

\$9,917,735 for Public Service Activities

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	17	0
Total	17	0

Table 5- Number of Households

	One-Year Goal	Actual
Number of households supported through rental assistance		
Number of households supported through the production of new units		
Number of households supported through the rehab of existing units		
Number of households supported through the acquisition of existing units		
Total		

Table 6 - Number of Households Supported

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

The Office worked with 2 non-profit developers of affordable housing to create new affordable rental units. One of the projects that consisted of ten (10) of the seventeen (17) units proposed began later than anticipated due to a higher than expected cost associated with the construction of those units. The project has stalled due to potential funding sources have not opened their respective applications. As the housing market in Warwick continues to improve and available housing stock becomes more limited the price is driven up, which continues to slow the creation of more units of affordable housing. The Office continues to outreach to local non-profit developers of affordable housing for the creation of affordable home-ownership & rental units. The Office also, works with local social service agencies for referrals to its Home improvement Loan Program and with RI Housing in partnership with their Lead Safe & Healthy Homes Program.

Discuss how these outcomes will impact future annual action plans.

It is anticipated that the seventeen (17) units proposed will be achieved during the next Program Year. As the housing market becomes increasingly more stable and prices rise and available housing stock is

more scarce, the Office's ability to create new units of Affordable Housing units becomes increasingly challenging. Outreach to a more diverse group of partners will assist the Office in developing the necessary links to resources to continue to create new housing units.

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 Persons Served	CDBG Actual	HOME Actual
Extremely Low-income	10	0
Low-income	20	0
Moderate-income	37	0
Total	67	0

Table 7 – Number of Persons Served

Narrative Information

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

The City of Warwick is not a direct recipient of HOPWA and ESG funds. Although the City does not have explicit goals to end homelessness, the City does partner with local non-profits that provide outreach & assessment services. The Elizabeth Buffum Chace Center, through its 24-hour hotline for victims of domestic violence and sexual abuse provides initial contact and assessment services. United Way's 2-1-1 call center conducts initial assessments and referrals. In addition, Homeless Housing providers provided services in conducting Vulnerability Index and Service Prioritization Decision Assistance to those individuals once housed.

Addressing the emergency shelter and transitional housing needs of homeless persons

The City of Warwick provides funding to numerous social service agencies that provide direct assistance to the homeless. These agencies provide housing assistance through emergency and non-emergency shelter & transitional housing. In addition, the agencies provide supportive services to those in their housing program including mental health services, chemical dependency intervention, and financial literacy. Many of the non-profits work cooperatively to provide cross agency supportive services to clients that would normally not be able to receive services if not for the cooperation and partnership activities.

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

Those non-profits serving the homeless population through housing and social service programs worked to provide 706 clients with critical services, services included; child care so family members can work, support for victims of domestic violence and sexual assault, mental health & chemical dependency supportive services, & providing access and avenues to other supportive services for special needs. Of the 706 individuals served; over 90% had either extremely low (430 individuals) or low (206 individuals) incomes. Local non-profit service providers provided clients with supportive services that enabled them to remain in stable, safe housing.

IDIS Activity ID	Project Title	Annual Goal (individuals)	Actual Accomplishment (Individuals)	Individual Income Levels			
				Extremely Low	Low	Moderate	Non- Moderate
754	HOH CDC Social Service Program	85	84	78	6	0	0
755	EBC, Inc. - Victim Safety & Self Sufficiency	175	253	138	115	0	0
753	Kent Center, Inc. - Victims of Trauma	20	27	22	3	2	0
752	Crossroads RI - Case Management	200	173	157	16	0	0
751	Westbay Community Action, Inc. - Children's Center Case Manager	60	123	19	40	27	37
750	Westbay Community Action, Inc. - Warwick Case Management	45	34	16	17	1	0
756	DayOne - Advocacy	10	12	0	9	3	0
Total (Individuals)		595	706	430	206	33	37

2015 CAPER - CR-25

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 Warwick continues to provide area non-profits with CDBG funds so they may continue their efforts in providing critical assistance to families that are at risk of becoming homeless as a result of trauma, addiction, loss of income, or thru the inability to manage ones finances. through partnerships like the "Warwick 13" and the Continuum of Care (CoC) the providers of supportive services communicate across agency borders and work to provide the reasources those most a risk need. A drastic reduction in State funding has caused many of the providers to tiage those indiviuals in crisis, this has lead to a less than effective mechanism in combating and reducing homelessness.

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

Actions taken to address the needs of public housing

The City of Warwick, through the Office of Housing & Community Development, initiated a program to attract landlords to the WHA's Housing Choice Voucher (HCV) program in program year 2015. This program will include financing incentives for rehabilitation of housing units and building systems. This incentive was ten thousand dollar decrease deferred loan over a period of five years, as long as there is a HCV tenant in in the unit. One unit was renovated and occupied by a low to moderate household through the program year.

In 2015, the WHA also received \$528,800 to make capital improvements in developments owned by the WHA. These improvements included roofing, flooring replacement and miscellaneous repairs at family housing locations.

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

The WHA has a Resident Advisory Board (RAB) that meets annually and as needed, should issues arise. The WHA staff reports to the RAB on policy issues and scheduled improvements. The staff also responds to tenant issues as part of the meetings. The WHA Board of Directors also includes a tenant representative who provides an ongoing link to the residents, continuously reporting policy changes and capital improvement issues to fellow residents. That tenant representative also brings tenant issues to the Board and staff for resolution. Tenants are aware of these meetings and encouraged to attend.

The Family Self-Sufficiency Program at the WHA can help families increase earned income and reduce dependency on welfare assistance and rental subsidies, eventually leading to homeownership

Actions taken to provide assistance to troubled PHAs

Warwick Housing Authority is not considered a trouble housing authority.

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

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

The City of Warwick Office of Housing and Community Development (The Office) continues to be cognizant of ensuring the affordability for housing activities receiving support from the Office and other sources. The Office works with its housing partners to create additional affordable housing opportunities in the City of Warwick.

- The Office, along with non-profit developers, will continue to assess the feasibility of the conversion of REO/foreclosed residential structures to affordable housing units throughout the jurisdictional boundaries of the City.
- The Office will continue to offer an affordable financing incentive to property owners to make repairs to their properties and add new units of Section-8 housing units to the Warwick market.

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

Limited funding is the primary barrier to addressing underserved needs in the City of Warwick. In Warwick, there are 13,035 lower income households and 6,238 individuals living below the poverty level. Housing and community development funds are targeted to programs and services that directly reach this population, but the growing need combined with shrinking state, federal and local resources presents a significant challenge.

The City of Warwick will continue to utilize local and federal funds, including CDBG funds to support programs for the homeless, near homeless and non-homeless with special needs. In 2015, the City remains committed to allocate the maximum allowable percentage of CDBG funds to public services. In order to address transportation needs of lower income residents, Transwick, the City's free transportation service for seniors and persons with disabilities, will remain in operation and the City will continue to advocate for the enhancement of public transportation on the local level.

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

The City works to address lead based paint (LBP) hazards and increase access to housing free of LBP hazards in four ways. First, the City collaborates with non-profit developers to produce affordable housing in Warwick. Whether new or rehabilitated, this newly developed housing is made lead

safe from LBP hazards.

Second, the City, through the Office of Housing & Community Development (OHCD), administers a Housing Rehabilitation program which offers below-market rate loans to homeowners for completion of critical renovations to the house. The Housing Rehabilitation Program is funded through an allocation of CDBG funds. Homeowners use these funds to complete renovations that result in lead-safe environments.

Third, OHCD has an effective relationship for housing rehabilitation with the LBP program at RI Housing, called LeadSafe Homes. This program offers forgivable loans for qualified participants to make homes lead safe. RI Housing will leave the homeowner with a lead safe certificate. Often, OHCD makes an immediate referral to LeadSafe Homes program when LBP is discovered in a home.

Fourth, OHCD, RI Housing and the RI Department of Health (Healthy Homes and Childhood Lead Poisoning Prevention) work collectively to educate the public about LPB hazards. This education is effective in several ways. The individual household is educated, when a housing rehabilitation job is considered. The staff of any non-profit working on housing issues in Warwick is well aware of LBP hazards and passes the information on to their clients, whether they are clients receiving housing services or not. For instance, Westbay Community Action, Inc., with over 7,000 households served each year, regularly distributes information on LBP hazards. Further, Westbay targets this information to certain clients, such as those receiving benefits through the Woman, Infants and Children program. Finally, educational efforts for the general public range from small City gatherings or pervasive media campaigns.

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

4The City's Housing Rehabilitation Program, funded with CDBG funds, will continue to assist lower income homeowners with safety, energy efficiency and accessibility improvements that enable them to live in their homes affordably. In 2015, CDBG funds will support Westbay Community Action, Inc.'s (Westbay) Home Repair Program; assisting approximately 35 lower-income households. In the coming year, OHCD will partner with The House of Hope CDC in the organization's capacity as a Community Housing Development Organization, to create rental and homeowner housing for lower-income households. House of Hope CDC's multi-faceted role as a homeless provider and housing developer enables the organization to help formerly homeless families and individuals transition out of poverty.

A total of 15 percent of Warwick's 2015 CDBG allocation supports public services, including childcare, transportation, senior care and other services that help move families and individuals out of poverty. OHCD partners with Westbay, the region's anti-poverty agency, to fund basic services. Westbay's service model addresses client emergency needs before connecting them to educational, childcare and training opportunities which enable them to achieve economic self-sufficiency. CDBG funds also support similar

services for homeless and victims of domestic violence provided by House of Hope CDC and the Elizabeth Buffum Chace Center.

Transwick, the City's free transportation service for low-income seniors and persons with disabilities connects these populations with services, job training and employment. The City also supports the provisions of Section 3 by encouraging contractors working on large contracts to train, hire and subcontract with low- and moderate-income residents in Warwick.

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

For the past 15 years, the Office of Housing & Community Development (OHCD), a division of the Warwick Planning Department, has administered the Community Development Block Grant (CDBG) program. The City's longstanding experience in this role means that the institutional structure is well established. The strength of the CDBG program is due in large part to the well-developed partnerships OHCD has with local, state and federal entities. The "Warwick 13", a collaborative effort of local social service providers working to address the housing and service needs of Warwick residents, has also been instrumental in effective program delivery. The Warwick Human Services Department will meet regularly with the "Warwick 13" in 2015 to increase the exchange of information between local providers and the City.

Additionally, a number of local advisory committees and associations participate in the community development program, by offering guidance to staff and local officials on community issues. These groups include: the Community Development Advisory Board, Pontiac Village Association, East Natick Village Association, Apponaug Village Association, and the Oakland Beach Association. The City will continue to work closely with these groups in the coming year.

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

For over 10 years, the City of Warwick has supported the efforts of many of its community partners in the creation of the "Warwick 13." The "Warwick 13" is a unique collaboration of public and private housing and social service providers that work collectively to address the needs of Warwick residents. These needs include: housing, substance abuse, mental and physical health, youth and early childhood development and other social services. The Warwick Human Services Department will meet with the "Warwick 13" in 2015 to increase the exchange of information between local providers and the City.

The Office of Housing & Community Development (OHCD) and the City consult on a regular basis with the Warwick Housing Authority to discuss topics including long range planning and specific development issues. The City of Warwick Planning Department regularly interacts with public and private entities to provide guidance and regulatory review on developments involving housing development, job creation

or general land use issues. This interaction extends to *RhodeMap RI*, a regional effort which will generate a statewide housing plan to address the housing needs of Rhode Island's lower income population.

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

A state-wide regional Analysis of Impediments was completed in August 2015. This state-wide effort ensures a comprehensive approach to reducing and/or eliminating barriers to affordable housing.

The City of Warwick Office of Housing and Community (The Office) continues to cognizant of ensuring geographic diversity in the city by:

- The Office, along with non-profit developers, will continue to assess the feasibility of the conversion of REO/foreclosed residential structures to affordable housing units throughout the jurisdictional boundaries of the city.
- The Office will continue to offer affordable financing incentive to property owners to make repairs to their properties and add new units of Section-8 housing units to the Warwick market.

Fair Housing Information and Enforcement

The Office continues to work on making information on the Office's programs easily accessible and works to accommodate all interested parties and are able to access its programs. The Office continues to support its many non-profits in their efforts to eliminate housing discrimination and support those in the development of new housing opportunities.

- The Office plans to work closely with the statewide Fair Housing Advisory Committee, to better Leverage and assess Fair Housing related issues.
- The Office will continue to provide information on its Programs to area non-profits and to the City's Senior & Social Service Programs.
- Information will continue to be available on the City's website.
- The Office will continue to offer interpreter services for those that have limited English proficiency and the deaf and hard of hearing. In Addition, those with limited mobility can request consultation in their homes if required
- The office will continue to provide funds to area nonprofits for the acquisition and the rehabilitation of properties into affordable housing units for both home-owners and renters.

Access to healthy Housing

The Office continues to offer financing to property owners interested in making their property lead safe.

- The Office will continue to provide affordable financing options to owners of pre-1978 residential properties to make their property lead safe
- The Office will continue to partner with Rhode Island Housing's Lead Safe & Healthy Home Program to further supplement the lead hazard reduction work and to ensure a more comprehensive approach to healthy homes.

Housing needs of people with disabilities

The Office works with non-profits on a referral basis to assist them with their clients that are elderly, have mobility issues or are handicap receiving services

- The Office will continue to provide affordable financing options to income eligible property owners that are elderly or are handicap or mobility issues to make improvements to their property and remain in their home.

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 City's Office of Housing & Community Development (OHCD) ensures compliance with federal CDBG regulations through a comprehensive monitoring process. The OHCD monitors sub-recipients and monitors completed CDBG funded projects for compliance with related federal requirements and beneficiary eligibility.

"Pre-Award Conferences" are required for all sub-recipients. The OHCD reviews program and record keeping requirements with the entity receiving federal funding. A written agreement that outlines the scope of the activities, performance criteria and length of funding period is required. Payment requests must be submitted with supporting documentation which may include time sheets, certified payroll records, affordable housing restrictions, income documentation, and corresponding bills and/or cash receipts.

The OHCD conducts on-site monitoring as needed during the program year. These visits are prioritized by determining if any organizations are considered high-risk. High-risk sub-recipients include: new (first-year) sub-recipients; those with high staff turnover; sub-recipients with previous compliance or performance problems; sub-recipients executing complex activities for the first time. Sub-recipients' files are reviewed for compliance with all regulations governing its administrative, financial, procurement and programmatic operations. Sub-recipients are also monitor in respect to their performance objectives.

Any construction work has periodic and final inspections. Proper documentation of expenditures, appropriate wages and satisfactory completion of work must be submitted prior to the expenditure of CDBG funds for public facility improvements. The City's agreements for construction include all necessary information for Davis Bacon including: HUD Form 4010 – Federal Labor Standards Provisions, U.S. Department of Labor Payroll forms, the appropriate wage determination, reference to the "Notice to All Employees" poster, to be posted at job site, reference to the "Contractor's Guide to Prevailing Wage Requirements for Federally-Assisted Construction Projects." The City also ensures compliance with the Americans with Disabilities Act, particularly for multi-family housing.

Recipients of HUD funds in excess of \$200,000 and individual contracts or subcontracts in excess of \$100,000 are subject to Section 3. Any contract in excess of \$100,000 will require a Section 3 plan from the contractor; OHCD will monitor that plan to ensure that businesses employed and individuals hired are used to the greatest extent possible as delineated in that plan. OHCD also will give a preference to bidders which are Small Business Enterprises (SBE's), Minority Based Enterprises (MBE's) and Women-Owned Enterprises (WBE's). In terms of long term planning, the OHCD works closely with the Warwick

Planning Department on the implementation of the *City of Warwick's Comprehensive Plan 2033* with an emphasis on housing and neighborhood improvements.

Warwick has also adopted a Conflict of Interest Policy for the Community Development Block Grant Program that is in compliance with the U.S. Code of Federal Regulations Title 24, Part 570.11.

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.

A DRAFT version of the CAPER was made available to the public on September 13, 2016. The DRAFT was posted on the City's website, and hard copies were delivered to the main branch of the Warwick Public Library, as well as made available at the Community Development Offices.

The availability of the DRAFT was announced on the City's website, as well as through a Legal Notice in the Warwick Beacon. Residents were offered 15 days to provide feedback through written comments, email or by phone.

No Comments were received. A final version of the CAPER will be made available on the City's website, as well as at the City's main planning office.

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.

There were no significant changes in program objectives 2015-2016 program year.

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

No

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