Proposed 2024 Annual Action Plan (updates will be posted throughout the comment period)

Executive Summary

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

1. Introduction

The City of Spokane's mission is to deliver efficient and effective services that facilitate economic opportunity and enhance the quality of life for its citizens. The Spokane Five-Year Consolidated Plan and individual Annual Plans provide a roadmap for allocating resources to achieve those objectives. The 2020-2024 Consolidated Plan established local goals and priorities consistent with national objectives established by HUD (US Department of Housing and Urban Development) to utilize funds allocated by the Community Development Block Grant (CDBG), the Emergency Solutions Grant (ESG), and the HOME Investment Partnership Program.

2. Summarize the objectives and outcomes identified in the Plan

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

The 2024 Annual Action Plan provides an overview of the activities that the City of Spokane will fund to achieve the goals and outcomes as outlined in the 2020-2024 Consolidated plan, and to meet the priority needs of the Spokane community.

Please refer to AP-35, AP-38 for additional information related to priority projects funded during program year 2024 (7/1/24 - 6/30/25).

3. Evaluation of past performance

This is an evaluation of past performance that helped lead the grantee to choose its goals or projects. In 2023, the City of Spokane served 718 individuals from 716 households with ESG funds through the Catholic Charities, House of Charity shelter project. Additionally, Catholic Charities served 89 clients from 31 households with ESG funds through their Rapid Rehousing program.

The HOME Program ran a successful RFP and identified two new construction projects to fund with several years of accumulated HOME funds in 2023. CHHS staff is engaged in the underwriting process for these projects and anticipates development of the new construction projects in late 2024.

CDBG results for 2023 are pending and will be added to the final draft.

4. Summary of Citizen Participation Process and consultation process

Summary from citizen participation section of plan.

Citizens are encouraged to offer public comments at any time. To do so, citizens may contact CHHS Department directly by emailing spokanechhs@spokanecity.org or calling (509)625-6325. Citizens may also request a meeting directly with staff through the same email and telephone number.

Citizens are encouraged to attend CHHS Board meetings held on the first Wednesday of every month from 4 to 6 PM (Spokane City Hall: City Council Briefing Center). The Board allows for public comment on items relevant to the CHHS Board during the first ten (10) minutes of each meeting.

CHHS hosts regular Public Hearings to initiate a formal public comment process. Public Hearings will be held prior to the approval of each Consolidated Plan, Assessment of Fair Housing, Annual Action Plan, and Consolidated Annual Performance and Evaluation Report (CAPER).

Public Hearings may be held at Spokane City Hall or in other community facilities throughout the City of Spokane. Generally, CHHS will host one public hearing prior to the submission of each Consolidated Plan, Annual Action Plan, and Assessment of Fair Housing (AFH). The second public hearing will occur prior to the submission of the Consolidated Annual Performance and Evaluation Report (CAPER). CHHS will publish a notice prior to each public hearing according to the adopted Citizen Participation Plan. Notice may appear in the Spokesman Review, CHHS website, through neighborhood councils, email distribution, and City of Spokane social media.

Citizens will have 30 calendar days (15 calendar days for the CAPER) to submit public comment to CHHS for review and consideration. All public comments will be reviewed and considered prior to publishing the final plan.

5. Summary of public comments

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

To be completed following close of public comment period.

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

To be completed following close of public comment period.

7. Summary

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To be completed following close of public comment period.

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

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

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

Agency Role		Name		Department/Agency	
Lead Agency		SPOKANE			
CDBG Administrator	SPOKA	NE	Community,	Housing and Human Services Department	
HOPWA Administrator			NA		
HOME Administrator	SPOKA	NE	Community,	Housing and Human Services Department	
ESG Administrator	SPOKA	NE	Community,	Housing and Human Services Department	
HOPWA-C Administrator					

Table 1 – Responsible Agencies

Narrative (optional)

The City of Spokane's Community, Housing and Human Services Department (CHHS) is responsible for administering the CDBG, HOME, and ESG programs in the City of Spokane's jurisdiction. CHHS is responsible for the development, implementation and administration of the consolidated plan and annual action plans.

All documents are available for public review on the City of Spokane's Website. Administration of CDBG and HOME Programs will continue regardless of the grant status and agreement with HUD for 2024 PY, to comply with federal regulations and requirements. The start date for PY 2024 will be July 1, 2024, for program administration of CDBG, HOME and ESG.

Consolidated Plan Public Contact Information

Please submit comments to the Community, Housing and Human Services Department via phone, email, or in-person.

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Physical Location:

808 W. Spokane Falls Blvd

Spokane, WA 99201

Phone: (509) 625-6325

Email: spokanechhs@spokanecity.org

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

1. Introduction

CHHS partners with local service provider agencies, non-profit organizations, developers, emergency services entities, Spokane Housing Authority, healthcare organizations, local businesses, educational institutions, other local government entities, and with the Homeless Intervention Team to achieve the goals outlined in the consolidated plan. Community engagement and consultation are provided through conversations and meetings with stakeholders and members of the CHHS Board and Spokane Regional CoC.

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

Spokane City/County offers numerous emergency hotlines for people seeking resources. Washington 211 is a free and confidential service via an easy access phone number which individuals can call or text to receive information about health and human services from a trained Referral Specialist. Washington 211 can provide information about food subsidy applications, homeless housing pre-screenings, health and wellness support, utility/energy assistance, veteran services, legal resources, disaster and crisis support, transportation, free tax preparation, and veterinarian services. If an individual has a specific issue for which they need assistance, there are specialized hotlines for that assistance.

The YWCA offers a 24-hour domestic violence helpline where an advocate located at their safe shelter is prepared to help to discuss options, safety plans, and other community resources. Lutheran Community Services offers a 24-hour crisis line for survivors of sexual assault to seek out information about their options for medical care, healing, and legal services. Frontier Behavioral Health (FBH) offers a mental health or substance use condition disorder hotline called the 24-Hour Regional Crisis Line, which gives assessments to those in crisis whose health and/or safety are in crisis.

Frontier Behavioral Health has created a Behavioral Response Unit that responds exclusively to mental health calls. The Co-responders program pairs mental health professionals with first responders (Spokane Police Department, Spokane Fire Department, and the Spokane County Sheriff's Office) to provide immediate intervention and stabilization services to individuals with mental health and substance use disorders. Once it has been established that there is a behavioral health case, the mental health counselor and first responder approach the individual to determine the circumstances and discuss the best way that each co-responder can support the individual.

For more information, please review the Spokane Regional CoC 5-Year Strategic Plan to Prevent and End Homelessness. https://static.spokanecity.org/documents/ending-homelessness/about/2020-2025-strategic-plan-to-prevent-and-end-homelessness.pdf

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

The current CoC governance structure was implemented in 2017 and was designed to connect a variety of sectors that intersect with homelessness with the intent of leveraging available resources and establishing common regional goals to decrease homelessness in the CoC's geographic region. The Governance Charter was updated in September 2022 to further broaden the experiences and resources brought to the CoC Board, and to clarify the role and responsibilities of Board members.

The CoC Board is comprised of more than 26 representatives, including people with lived homeless experience, homeless service providers, public housing, behavioral health and chemical dependency, workforce, healthcare, law and justice, advocates, veteran service providers, education, funders, landlords, child welfare, local business, and regional government. These representatives are system leaders who can make decisions that quickly change the way we address key challenges and be responsive to changing needs. There are also four standing committees (Executive, Planning and Implementation, CMIS and Evaluation, Funding and RFP), four workgroups (Communications, Data and Performance, Community Outreach, and Racial Equity), and seven population- and intervention-specific sub-committees: Youth Lived Experience, Youth Advisory Board, Veterans Lived Experience, Families Lived Experience, Single Adults Lived Experience, Equity and Diversion. These committees, workgroups, and sub-committees consist of board members, front-line staff, people with lived homeless experience, and experts that advise the CoC Board and help to guide the homeless crisis response system. While ESG program staff are not voting members of the Board, they attend the CoC Board meetings and actively participate in standing committee and subcommittee meetings.

Through the five-year strategic planning process for the CoC, the CoC Board and ESG program staff identified the funding priority for ESG funding in the Spokane Regional CoC. The ESG funding directly addresses the needs of homeless persons through the work of the Catholic Charities House of Charities project which receives no more than 40% of the ESG award granted to the City of Spokane. This project provides night-by-night housing and essential services for individuals experiencing homelessness. The project collaborates with the CoC's coordinated entry programs to identify long-term solutions for individuals engaged with the House of Charity. The second project funded through the ESG award is Catholic Charities Rapid Re-Housing Program for families. This program works with the CoC's coordinated entry program to rapidly re-house families who are experiencing homelessness or are at immediate risk of homelessness. Both projects address the needs of homeless individuals and families, or individuals and families at risk of homelessness.

For more information, please review the Spokane Regional CoC 5-Year Strategic Plan to Prevent and End Homelessness. https://static.spokanecity.org/documents/ending-homelessness/about/2020-2025-strategic-plan-to-prevent-and-end-homelessness.pdf

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

The City of Spokane is the Collaborative Applicant (CA) and the CMIS Lead for the Spokane Regional Continuum of Care. The CA/ESG program staff are the same staff and regularly work with the CoC on the plan to allocate ESG funds, and to report/evaluate ESG project performance. CMIS staff within the City of Spokane provide CoC/ESG staff with relevant data related to program performance and community need. The data provided by the CMIS Lead helps the CoC and ESG programs identify priority needs, make funding recommendations, and develop Consolidated Plan goals that guide investment of ESG funds. Through this process, ESG activities remain consistent with CoC homeless planning and the Consolidated Plan.

The CoC collaborates with the CoC Data and Analysis Committee to set performance measures and evaluate ESG outcomes to ensure compliance and identify poor performers. CoC and ESG funded projects are awarded and renewed using objective scoring criteria that includes project performance and outcomes (e.g. % exits to/retention of permanent housing, income growth, % returns to homelessness), utilization, spenddown rates, average vulnerability of households served, subpopulation served (i.e., veterans, chronic, family, youth) and projects' ability to provide specialized services for these subpopulations, using a housing first/low-barrier approach, and cost-effectiveness. Scoring criteria also includes consideration of results from ongoing monitoring of CoC and ESG projects, including a review of quarterly and annual performance, and compliance with applicable regulations, grant guidelines, and contractual requirements. Scores are based on CoC approved system and project level performance measures that include benchmarks which are specific to both project type and subpopulation.

Due to the close relationship between ESG and CA/CoC program staff, the ESG program is represented in CoC decision-making regarding the funding, policies and procedures and administration of the HMIS system in the Spokane Regional CoC. ESG/CA/CoC program staff meet regularly with the CMIS Lead and contribute to the yearly and long-term priorities of the CMIS Team.

For more information, please review the Spokane Regional CoC 5-Year Strategic Plan to Prevent and End Homelessness. https://static.spokanecity.org/documents/ending-homelessness/about/2020-2025-strategic-plan-to-prevent-and-end-homelessness.pdf

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

Table 2 – Agencies, groups, organizations who participated

	le 2 – Agencies, groups, organizations who participate	
1	Agency/Group/Organization	Community, Housing, and Human Services Board
	Agency/Group/Organization Type	Other government - Local
	What section of the Plan was addressed by	Housing Need Assessment
	Consultation?	Homelessness Strategy
		Non-Homeless Special Needs
		Market Analysis
		Economic Development
		Anti-poverty Strategy
	Briefly describe how the	The CHHS Board approves funding priorities and provides funding recommendations to
	Agency/Group/Organization was consulted.	the Spokane City Council. CHHS staff work closely with the Board to discuss community
	What are the anticipated outcomes of the	needs for low- and moderate-income individuals.
	consultation or areas for improved	
	coordination?	
2	Agency/Group/Organization	SPOKANE HOUSING AUTHORITY
	Agency/Group/Organization Type	PHA
	What section of the Plan was addressed by	Housing Need Assessment
	Consultation?	Public Housing Needs
		Homelessness Strategy
	Briefly describe how the	SHA assisted with the public housing sections of the Consolidated Plan and the 2024
	Agency/Group/Organization was consulted.	Annual Action Plan. SHA works with the City to provide Tenant Based Rental Assistance
	What are the anticipated outcomes of the	and builds housing for previously homeless individuals.
	consultation or areas for improved	
	coordination?	
3	Agency/Group/Organization	WA 502 Spokane Regional Continuum of Care Board
	Agency/Group/Organization Type	Regional organization

	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	The Consolidated Plan's strategy for addressing homelessness was co-developed with the CoC Staff as the CoC developed the 5-Year Strategic Plan to Prevent and End Homelessness. CDBG funding is awarded to projects in support of the priorities identified in the Consolidated plan that was developed in consultation with the CoC. For more information, please review the Spokane Regional CoC 5-Year Strategic Plan to Prevent and End Homelessness. https://static.spokanecity.org/documents/ending-homelessness/about/2020-2025-strategic-plan-to-prevent-and-end-homelessness.pdf
4	Agency/Group/Organization	Spokane County Housing and Community Development Department
	Agency/Group/Organization Type	Other government - County
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homelessness Strategy Non-Homeless Special Needs Anti-poverty Strategy Lead-based Paint Strategy

Briefly describe how the
Agency/Group/Organization was consulted.
What are the anticipated outcomes of the
consultation or areas for improved
coordination?

A member of Spokane County HCD Department serves as a voting member of the Spokane Regional CoC Board with the CHHS staff. Spokane County also participates in the City of Spokane CHHS Board. The CHHS Board is consulted regularly regarding the Consolidated Plan and the Annual Action Plan. The City of Spokane is part of the Spokane County Broadband Action Team and will be completing an ILA with the County to be on the board of BROADLINC, the County-wide PDA focused on broadband.

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

CHHS consults with numerous community stakeholders to ensure resources are provided to citizens in need of public assistance. The list of organization listed above are representative of government agencies, service providers, educators, veteran services, schools, and public health. CHHS provides an inclusive opportunity for citizen engagement in all planning processes.

No major agencies involved in housing or community development were intentionally excluded from consultation. Every effort was made to ensure advance publication of meetings and opportunities to contribute.

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

Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
Continuum of Care	City of Spokane Community, Housing and Human Services	The Consolidated Plan's strategy for addressing homelessness was co-developed with the CoC Staff as the CoC developed the 5-Year Strategic Plan to Prevent and End Homelessness. CDBG funding is awarded to projects in support of the priorities identified in the Consolidated plan that was developed in consultation with the CoC. For more information, please review the Spokane Regional CoC 5-Year Strategic Plan to Prevent and End Homelessness. https://static.spokanecity.org/documents/ending-homelessness/about/2020-2025-strategic-plan-to-prevent-and-end-homelessness.pdf

Table 3 – Other local / regional / federal planning efforts

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Narrative (optional)

AP-12 Participation – 91.105, 91.200(c)

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

The City of Spokane is designated as an entitlement community by the Department of Housing and Urban Development (HUD). As such, the Community, Housing and Human Services (CHHS) Department is responsible for conducting administrative responsibilities related to the Community Development Block Grant Program (CDBG), Home Investment Partnership Program (HOME) and the Emergency Solutions Grant (ESG). Federal regulations mandate that each entitlement community must develop and adhere to a Citizen Participation Plan (24 CFR 91.105). The following document represents the process by which the CHHS Department will facilitate public involvement and communication relating to entitlement programs (CDBG, HOME and ESG).

OBJECTIVES

- 1. Provide guidance to the Spokane community that will promote and expand citizen participation in the Consolidated Planning Process
- 2. Provide citizens with an avenue for making public comment
- 3. Support transparent communication between CHHS and the Spokane community

CONTACT INFORMATION:

Citizens are encouraged to offer public comments at any time. To do so, please contact CHHS Department directly by emailing spokanecity.org or calling (509)625-6325. If requesting a staff meeting, please allow two working days advance notice.

Citizens are encouraged to attend CHHS Board meetings held on the first Wednesday of every month from 4 to 6 PM (Spokane City Hall: City Council Briefing Center). The Board allows for public comment on items relevant to the CHHS Board during the first ten (10) minutes of each meeting.

CHHS will host regular Public Hearings to initiate a formal public comment process. Public Hearings will be held prior to the approval of each Consolidated Plan, Assessment of Fair Housing, Annual Action Plan, and Consolidated Annual Performance and Evaluation Report (CAPER).

Public Hearings may be held at Spokane City Hall or in other community facilities throughout the City of Spokane. Generally, CHHS will host one public hearing prior to the submission of each Consolidated Plan, Annual Action Plan, and Assessment of Fair Housing (AFH). The second public Annual Action Plan

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hearing will occur prior to the submission of the Consolidated Annual Performance and Evaluation Report (CAPER). CHHS will publish a notice prior to each public hearing according to the adopted Citizen Participation Plan. Notice may appear in the Spokesman Review, CHHS website, through neighborhood councils, email distribution, and City of Spokane social media.

Citizens will have 30 calendar days (15 calendar days for the CAPER) to submit public comment to CHHS for review and consideration. All public comments will be reviewed and considered prior to publishing the final plan.

Citizen Participation Outreach

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted	URL (If applicable)
		Non			and reasons	
		Non-				
1	Public Hearing	targeted/broad				
		community				
		Non-				
2	Newspaper Ad	targeted/broad				
		community				
		Non-				
3	Internet Outreach	targeted/broad				
		community				

Table 4 – Citizen Participation Outreach

Expected Resources

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

Introduction

Anticipated Resources

Program	Source	Uses of Funds	Expe	cted Amour	nt Available Ye	ear 1	Expected	Narrative Description
	of Funds		Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$	Amount Available Remainder of ConPlan \$	
CDBG	public -	Acquisition					•	These are estimates at the time of
	federal	Admin and						public comment. Actual annual
		Planning						allocation and Program Income is
		Economic						unknown at this time.
		Development						
		Housing						
		Public						
		Improvements						
		Public Services	3,126,340	413,440	0	3,539,780	0	

Source	Uses of Funds	Expected Amount Available Year 1				Expected	Narrative Description
of Funds		Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$	Amount Available Remainder of ConPlan \$	
public - federal	Acquisition Homebuyer assistance Homeowner rehab Multifamily rental new construction Multifamily rental rehab New construction for ownership TBRA	1,409,280	185,000	0	1,594,280	0	These are estimates at the time of public comment. Actual annual allocation and Program Income is unknown at this time.
public - federal	Conversion and rehab for transitional housing Financial Assistance Overnight shelter Rapid re-housing (rental assistance) Rental Assistance Services Transitional	277.000	0	0	377.000	0	These are estimates at the time of public comment. Actual annual allocation and Program Income is unknown at this time. ESG has separate public notice procedures.
	public - federal	public - Acquisition federal Homebuyer assistance Homeowner rehab Multifamily rental new construction Multifamily rental rehab New construction for ownership TBRA public - Conversion and federal rehab for transitional housing Financial Assistance Overnight shelter Rapid re-housing (rental assistance) Rental Assistance Services	public - federal	public - federal Homebuyer assistance Homeowner rehab Multifamily rental new construction for ownership TBRA 1,409,280 185,000 public - Conversion and federal housing Financial Assistance Overnight shelter Rapid re-housing (rental assistance) Rental Assistance Services Transitional	Annual Allocation: \$ Program Income: \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$	Annual Allocation: \$ Prior Year Resources: \$ public - federal Homebuyer assistance Homeowner rehab Multifamily rental new construction Multifamily rental rehab New construction for ownership TBRA 1,409,280 185,000 0 1,594,280 public - federal Conversion and rehab for transitional housing Financial Assistance Overnight shelter Rapid re-housing (rental assistance) Rental Assistance Services Transitional	Annual Allocation: \$ Program Income: \$ S Prior Year Resources: \$ Amount Available Remainder Resources: \$ S Prior Year Reso

Table 5 - Expected Resources – Priority Table

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

The HOME Program will meet basic match requirements at a program level for tenant-based rental assistance, and development of affordable rental units. Match is generated when affordable rental unit development is financed with permanent investments of non-federal, non-owner funds. Additionally, the City of Spokane will utilize local revenue from the Sales and Use Tax for Affordable Housing and Supportive Services to meet the federally required HOME match requirements.

The City of Spokane partners with the Washington State Department of Commerce for funding to address homelessness. Washington State Department of Commerce funding sources are used to leverage goals outlined in the WA 502 CoC 5-Year Strategic Plan to Prevent and End Homelessness.

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

The City of Spokane supports multiple partner agencies operating in publicly owned facilities. Support for these facilities will remain throughout the duration of this Annual Action Plan. The City of Spokane will continue to seek out partnerships with new and experienced affordable housing developers, and provide technical assistance, so that developers may acquire or rehabilitate properties that expand affordable housing within our community.

The CHHS Department owns several parcels which are currently being scrutinized for sale or programming into affordable housing projects.

Discussion

All funding allocations will meet basic eligibility requirements as noted in the Code of Federal Regulations. Funds will support activities that serve the needs of low- and moderate-income individuals and families. For more information regarding the eligible use of these funds, please contact the Community, Housing and Human Services Department at spokanechhs@spokanecity.org.

Annual Goals and Objectives

AP-20 Annual Goals and Objectives

Goals Summary Information

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	Housing	2020	2024	Affordable		Improve affordable	CDBG:	Homeowner Housing
	Stability			Housing		housing access &	\$1,424,021	Rehabilitated: 230 Household
						availability		Housing Unit
2	Community	2020	2024	Homeless		Community based	CDBG:	Public Facility or Infrastructure
	Based Social			Non-Homeless		social service	\$1,758,512	Activities other than
	Services			Special Needs		programming		Low/Moderate Income Housing
				Non-Housing				Benefit: 5 Persons Assisted
				Community				Businesses assisted: 180
				Development				Businesses Assisted

Table 6 – Goals Summary

Goal Descriptions

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1	Goal Name	Housing Stability
	Goal Description	This goal will fund the following Housing Stability activities: Single Family Rehabilitation: \$1,624,021 (Allocation: \$924,021, Revolving Loan Fund: \$700,000) Minor Home Repair: \$500,000 Grand total for this goal: \$2,124,021
		Gianu total for this goal. \$2,124,021

2	Goal Name	Community Based Social Services
2	Goal Name Goal Description	This goal will fund the following Public Service activities: CHAS - Dental Voucher Clinic: \$75,000 West Central Community Center - Youth Development: \$35,000 YWCA - Behavioral Health Services: \$58,935 Northeast Youth Center - Youth Program: \$55,541 Women & Children Free Restaurant - Food Bank: \$65,000 Partners with Families and Children: \$86,574 Our Place - Food Bank: \$70,402 Lutheran Community Services Northwest - Social Services: \$84,515 Sub total: \$530,967 This goal will fund the following Public Facility Improvements: Northeast Community Center - Walkway Cover: \$120,000 The Salvation Army Food Bank - Facility Expansion: \$456,000 Family Promise - Facility Improvements: \$51,921 Catholic Charities - St. Margaret's Shelter Improvements: \$102,943 Excelsior - Roof Replacement: \$253,500 Sub total: \$984,364 This goal will fund the following Economic Development projects: Hispanic Business & Professionals Association/Nuestras Raices Centro Community - Sin Miedo al Exito! (Success with Confidence) \$66,181
		Spokane Neighborhood Action Partners – Financial Access: \$150,000 Sub total: \$216,181
		Grand total for this goal: \$1,731,512

Projects

AP-35 Projects – 91.220(d)

Introduction

Projects

#	Project Name
1	Public Services for 2024 Program Year
2	Public Facility Improvements 2024 PY
3	Homeowner Housing Affordability Programs
4	Economic Development - Micro Enterprise

Table 7 - Project Information

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

AP-38 Project Summary

Project Summary Information

1	Project Name	Public Services for 2024 Program Year
	Target Area	
	Goals Supported	Community Based Social Services
	Needs Addressed	Community based social service programming
	Funding	CDBG: \$530,967
	Description	Public Service Activities to include:
		CHAS - Dental Voucher Clinic West Central Community Center - Youth Development YWCA - Behavioral Health Services Northeast Youth Center - Youth Program Women & Children Free Restaurant - Food Bank Partners with Families and Children Our Place - Food Bank Lutheran Community Services Northwest - Social Services Names and addresses below.
	Target Date	6/30/2025
	Estimate the number and	Approximately 13,802 low- and moderate-income persons will
	type of families that will	benefit from Public Service Activities that provide for: health
	benefit from the	services, youth services, victim services, childcare services, and food
	proposed activities	banks.

Location Description

Organization Addresses are provided below (services may not be at the same address if they are mobile):

CHAS Dental Health 611 N Iron Bridge Way Spokane, WA 99202

West Central Community Center Youth Development & Recreation Program 1603 N Belt St Spokane, WA 99201

YWCA 930 N Monroe St Spokane, WA 99201

Northeast Youth Center 3004 E Queen Ave Spokane, WA 99217

Women & Children Free Restaurant 1408 N Washington St Spokane, WA 99201

Partners with Families and Children 106 W Mission Ave Spokane, WA 99201

Our Place Food Bank 1509 E College Ave Spokane, WA 99201

Lutheran Community Services Northwest 210 W Sprague Ave Spokane, WA 99201

	Planned Activities	Serving low- and moderate-income people and households with the following services:
		Food security: Our Place, Women & Children Free Restaurant Victim Services: Lutheran Community Services Northwest, YWCS, Partners with Families & Children Community Center programs: West Central Community Center, Northeast Youth Center Dental vouchers: CHAS
Project Name Public Facility In		Public Facility Improvements 2024 PY
	Target Area	
	Goals Supported	Community Based Social Services
	Needs Addressed	Community based social service programming
Funding CDBG: \$984,364		CDBG: \$984,364
	Description	Public Facility improvements to include: Northeast Community Center – Walkway Cover The Salvation Army Food Bank – Facility Expansion Family Promise – Facility Improvements Catholic Charities – St. Margaret's Shelter Improvements Excelsior – Roof Replacement Names and addresses below.
	Target Date	6/30/2025
	Estimate the number and type of families that will benefit from the proposed activities	No applicable to Public Facility Projects. Area-wide benefit is used rather than beneficiary counts to gain eligibility.

	I	
	Location Description	Location of Public Facility Improvements::
		Northeast Community Center
		4001 N Cook St
		Spokane, WA 99207
		The Salvation Army Food Bank
		222 E Indiana Ave
		Spokane, WA 99207
		Family Promise
		2002 E Mission Ave
		Spokane, WA 99202
		Catholic Charities – St. Margaret's Shelter
		12 E 5 th Ave
		Spokane, WA 99202
		Excelsior Wellness
		3754 W Indian Trail Rd
		Spokane, WA 99208
	Planned Activities	Improvements to these Public Facilities varies. Included are ADA
		improvements, Food Bank expansion, HVAC improvements, and roof
		replacement.
3	Project Name	Homeowner Housing Affordability Programs
	Target Area	
	Goals Supported	Housing Stability
	Needs Addressed	Improve affordable housing access & availability
	Funding	CDBG: \$1,424,021
	Description	Homeowners will gain housing stability through grants for Minor
		Home Repairs or low-interest loans for Single Family Rehabilitation
		projects.
	Target Date	6/30/2025
	Estimate the number and	Approximately 200 low- and moderate- income households will gain
	type of families that will	Minor Home Repair grants and 30 low- and moderate-income
	benefit from the	households will gain Single Family Rehab loans.
	proposed activities	
		•

	Location Description	Various locations throughout the City of Spokane.
		Program Management Spokane Neighborhood Action Partners (SNAP) 3102 W Whistalks Way Spokane, WA 99224
	Planned Activities	Minor Home repair grants will be provided to qualified households. Single Family Rehab loans will be provided to qualified households who are able to enter into a loan agreement.
4	Project Name	Economic Development - Micro Enterprise
	Target Area	
	Goals Supported	Community Based Social Services
	Needs Addressed	Community based social service programming
	Funding	CDBG: \$216,181
	Description	Micro Enterprise assists low- and moderate-income entrepreneurs to do a business plan and may provide loans for start-up or expansion.
	Target Date	6/30/2025
	Estimate the number and type of families that will benefit from the proposed activities	Approximately 180 low- and moderate-income people will gain access to services
	Location Description	Hispanic Business & Professionals Association/Nuestras Raices Centro Community 1214 E Sprague Ave Spokane, WA 99202 Spokane Neighborhood Action Partners – Financial Access 500 S Stone St Spokane, WA 99202
	Planned Activities	

AP-50 Geographic Distribution – 91.220(f)

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

The City of Spokane has identified six separate target investment areas. These areas are: Downtown, Sprague Union, Kendall Yards/North Bank, West Plains/Airport, The YARD, and University District. While the City of Spokane is not specifically targeting any of these areas for entitlement funding, residents in all of these target investment areas may see benefits resulting from projects funded in this Action Plan.

Interested individuals may learn more about the City of Spokane Target Investment Areas by following this link: https://my.spokanecity.org/economicdevelopment/target-areas/

The City of Spokane offers multiple incentive programs that promote economic vitality and the development of housing for all levels of income. To learn more about these incentives, please visit: https://my.spokanecity.org/economicdevelopment/incentives/

Geographic Distribution

Target Area	Percentage of Funds

Table 8 - Geographic Distribution

Rationale for the priorities for allocating investments geographically

NA

Discussion

Affordable Housing

AP-55 Affordable Housing - 91.220(g)

Introduction

The HOME Program supports affordable housing development. HOME projects that provide new units is preferred, however rehab of existing rental units is eligible, as is acquisition of existing rental units. Projects may include set aside units for homeless, seniors, and special needs populations. Tenant based rental assistance will be provided by HOME ARP funds to one or more organizations to assist low- and moderate-income renters who qualify. CDBG also contributes to rehab of existing units through the Single-Family Rehab Program. Estimated numbers of households will be updated prior to submission of the 2024 Annual Action Plan to HUD.

One Year Goals for the Number of Households to	be Supported
Homeless	0
Non-Homeless	0
Special-Needs	0
Total	0

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

One Year Goals for the Number of Households Sup	ported Through
Rental Assistance	0
The Production of New Units	10
Rehab of Existing Units	0
Acquisition of Existing Units	0
Total	0

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

Discussion

Applicants for CDBG and HOME will provide details on their development applications to inform CHHS, and then CHHS will set goals for households to be supported.

AP-60 Public Housing – 91.220(h)

Introduction

Spokane Housing Authority (SHA), which began in 1972 as the Housing Authority of the City of Spokane, is now a multi-jurisdictional agency serving many cities and six counties in Eastern Washington. The partnership between SHA and the City of Spokane continues to provide affordable housing for thousands of households. SHA is governed by a seven-member Board of Commissioners to include one "directly assisted Commissioner" and six commissioners appointed by the following: Two (2) individuals appointed by the mayor of the city of Spokane, two (2) individuals appointed by the City Council of the City of Spokane Valley, and two (2) individuals appointed by the Spokane County Commissioners. Each member serves a five-year term of office, with terms rotating in such a manner that one appointment is made each year. The Board has full authority in the establishment of SHA policies, long-term direction, and oversight of programs that accomplish the Agency's mission.

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

Spokane Housing Authority has always had an extremely small public housing program. Initially, just 125 total public housing units were in SHA's inventory. In 2015, SHA was given permission to move forward with a Rental Assistance Demonstration (RAD) Program portfolio project to divest its public housing inventory.

As of November 1, 2019, the Spokane Housing Authority (SHA) no longer owns or operates Public Housing units. SHA has utilized HUD's Rental Demonstration Program (RAD) to convert all Public Housing units to project-based housing vouchers under the Housing Choice Voucher program. This process began in 2016 with the conversion of 50 public housing units at the Parsons Apartments and was completed in November of 2019 with the conversion of 74 scattered site properties that represented the remaining public housing units operated by the Housing Authority.

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

Spokane Housing Authority has no remaining public housing units.

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

Not applicable. The Spokane Housing Authority is designated as a high performer.

Discussion

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

The Spokane City/County Continuum of Care, in support of the 2020-2025 Strategic Plan to End Homelessness, will focus on action steps aimed at obtaining the following objectives: quickly identifying and engaging people experiencing homelessness; prioritization of homeless housing for people with the highest needs; effective and efficient homeless crisis response housing and services that swiftly move people into stable permanent housing; a projection of the impact of the fully implemented local plan on the number of households housed and the number of households left unsheltered, assuming existing resources and state policies; and address racial disparities among people experiencing homelessness.

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

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

In an effort to reach out to the unsheltered population, the community has implemented a number of street outreach initiatives. The City of Spokane's CHHS Department works with other City entities such as Code Enforcement and Police to support the Homeless Street Outreach Team, a collaboration between homeless housing providers, coordinated assessment, and mental health providers to identify and provide outreach to individuals occupying homeless encampments. This interagency collaboration includes both city-funded street outreach teams and a PATH-funded outreach team for homeless individuals with mental illness and provides a pipeline for housing and support services to the chronically homeless unsheltered population in our community.

The City of Spokane has identified the need for additional investment in street outreach in the next year and has targeted these funds to both expand the capacity of existing efforts and to facilitate better alignment of services between City-, PATH-, SSVF-, RHY-, and STR Opioid Crisis-funded Street outreach teams. This new street outreach collaborative meets on a bi-weekly basis to case conference common clients and coordinate outreach services to ensure 100% geographic coverage of the jurisdiction and that clients are matched to the appropriate service provider. **Addressing the emergency shelter and transitional housing needs of homeless persons**

The CoC identified the need to provide emergency response to families and individuals who are homeless, and recognized the continued need for shelter beds to be available when a person is unsheltered. Although the CoC is moving towards providing permanent, rather than temporary, housing options, there are some subpopulations, such as youth, pregnant/parenting young adults, households fleeing domestic violence, clients exiting institutions, and families with children involved with the child

welfare system, who continue to benefit from a supportive transitional housing program.

The jurisdiction's goal is to operate a comprehensive shelter system that meet the needs of all households regardless of composition and quickly transition households from homelessness back into permanent housing. Currently the shelter system includes programs to serve the specific needs of homeless adult men, adult women, unaccompanied youth, and households with children.

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 jurisdiction's coordinated entry process includes access to diversion programs to prevent individuals and families with children from entering the crisis response system. Prevention of homelessness is achieved through diversion interventions by assisting households with gaining access to personal and community resources, and when applicable, providing small grants to households to cover expenses that when unpaid would lead to homelessness.

ESG is funding rapid re-housing for families and emergency shelter operations for individuals. Households who present as chronically homeless with very high barriers are placed directly into available PSH units or available bridge housing currently available for families. The Way-Out Center was opened in 2021 to include emergency shelter and transitional/bridge housing for chronic single adults.

The Supportive Services for Veteran Families (SSVF) program provides an essential resource for Veterans and their families who are homeless or at risk of homelessness. SSVF provides intensive outreach, housing search and placement, and continued case management for this population. For Veterans who need more intensive housing services, Spokane Housing Authority (SHA) has a successful partnership with the Veterans Administration to provide VASH vouchers to homeless veterans. All referrals are made through the VA, who also provides complete wrap-around supportive services. Veterans that are not eligible for these programs are prioritized for placement in PSH dedicated to chronically homeless veterans.

The Youth Homelessness Demonstration Project (YHDP) from provided the jurisdiction with an essential new resource for the provision of rent assistance, transitional housing, street outreach, and case management for young adults ages 18 through 24. YHDP provides young adults with housing search assistance, temporary rental assistance, and case management as well as access to transitional or interim housing during the housing search process for youth with the highest barriers. The Youth Subcommittee of the CoC and the Youth Advisory Board evaluated the effectiveness of the joint TH-RRH project under YHDP and determined that both components need to be operated by the same agency.

These efforts shorten the time families and singles are homeless and increase their stability for permanent housing.

HOME Tenant-Based Rental Assistance, granted to Spokane Housing Authority, continues to be a critical tool in achieving permanent housing for families and individuals experiencing homelessness.

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

The jurisdiction works with the following housing and health care partners on the implementation of an integrated care program: Empire Health Foundation, Providence Health Care, Community Health Association of Spokane, and Volunteers of America. The program strives to ensure eligible homeless clients are not discharged from in-patient hospital care or emergency room visits onto the streets. The Spokane County Regional Behavioral Health Division (SCRBH) is responsible for all community-based mental health services for inpatient and outpatient care services. Eastern State Hospital works in conjunction with Frontier Behavioral Health Outreach Team, Spokane County Supportive Living Program, and Behavioral Health Options. These programs work with the clients and the outpatient mental health provider to create a plan for housing and continued services.

The CoC has ensured that its members have written procedures to address discharge planning of youth exiting foster care. The Department of Children, Youth, and Families procedures provide for Independent Living Services and require an Independent Living Plan to assist the youth toward a successful transition to adulthood. Local DCYF Social Workers and other community stakeholders work with youth as they near 18 to establish an Independent Living Program (ILP) to guide the services and housing assistance until they are 21.

Airway Heights Corrections facility and the local jail works with Pioneer Human Services who operates a 55-bed work release facility for women and an 80-bed work release facility for men. A formalized discharge plan, in which housing is a requirement, is created for each client as they discharge from these facilities.

Discussion

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

Introduction:

The City of Spokane is facing growing housing challenges that include low vacancy and increasing prices. Housing affordability is critical for all residents to thrive and is the foundation of a vibrant and resilient community. The City of Spokane is working to address barriers to affordable housing by implementing a plan to address all aspects of housing choice. The City partners with the Washington State Department of Commerce, Spokane County, to increase access to housing within the region.

Actions it planned to remove or ameliorate the negative effects of public policies that serve as barriers to affordable housing such as land use controls, tax policies affecting land, zoning ordinances, building codes, fees and charges, growth limitations, and policies affecting the return on residential investment

In 2019, the Washington Legislature passed E2SHB 1923 to increase residential capacity in cities across Washington. The bill emphasizes the need to increase housing supply for all income levels, and encourages cities to prioritize the creation of affordable, inclusive neighborhoods. The City of Spokane received a grant from the Washington Department of Commerce to develop a local housing action plan focused on infill housing and housing choice, safe and quality housing, affordable housing construction, and re-housing for those experiencing homelessness.

In July 2021, the City adopted its Housing Action Plan (HAP) to help increase housing options that are affordable and accessible for people and families of all incomes. The HAP provides a strategic approach to address current and future housing needs of the Spokane community and builds upon previous initiatives around infill development, housing quality, and affordable housing funding.

Priorities of Spokane's Housing Action Plan:

- Increase housing supply, options, and affordability for all incomes. This includes strategies to support the availability of housing options and encourage the construction of both affordable and market-rate housing.
- Preserve housing affordability and quality to help people thrive where they live. This priority highlights the connections between housing affordability and quality to preserve and enhance existing housing throughout Spokane and support residents in every neighborhood.
- Enhance equitable access to housing and homeownership. This priority seeks to understand and consider the historic context that has contributed to patterns of inequity and encourages the City to break down barriers to accessible housing.
- Leverage and grow partnerships to support housing initiatives across the region. This priority encourages local and regional partnerships to address the many housing challenges faced by the

community and across the greater region.

Following its adoption in 2021, the Spokane City Council identified potential steps in the HAP and developed a commitment for action. The summary of strategies below outlines Council's intentions to move forward with an understanding of the critical shortage of residential housing.

Summary of Strategies:

- Land use changes to support increased density using infrastructure priorities
- Support for rapid development of accessory dwelling units using infrastructure priorities
- Financial incentives for rapid development of attainable housing using infrastructure priorities
- Administrative reform and resources for rapid development of housing
- Additional support of rental housing market
- Housing equity strategies

For more information regarding the Housing Action Plan and other planning efforts related to housing, please visit:https://my.spokanecity.org/housing/spokane-housing-action-plan/

Discussion:

Citizens are encouraged to participate in the planning efforts as the City of Spokane responds to the growing housing needs within our community. For more information about how citizens can participate in this discussion, please visit: https://my.spokanecity.org/housing/spokane-housing-action-plan/

AP-85 Other Actions – 91.220(k)

Introduction:

The following actions are intended to align with the needs and goals identified in the 2020 – 2024 Consolidated Plan. The Community, Housing and Human Services Department will remain adaptive and ready to serve as needs arise and the response system must be tailored to meet community needs.

Actions planned to address obstacles to meeting underserved needs

The City of Spokane will continue to engage with partner and local agencies to ensure unmet and changing needs within our community are addressed. Citizens are encouraged to engage in public processes to support the needs and goals identified in this Annual Action Plan.

- 1. Improve affordable housing access & availability.
- 2. Community based social service programming.

Actions planned to foster and maintain affordable housing

Given the high demand for affordable housing, the City of Spokane recognizes the importance of fostering affordable housing development and maintaining existing affordable housing stock. The City of Spokane also provides Tenant Based Rental Assistance, when possible, to extremely low-income/homeless families to create affordable housing options at market rate rental housing located across the City of Spokane. The City of Spokane fosters relationships with both for-profit and nonprofit housing developers when soliciting HOME Multifamily Housing Program funding proposals. The City of Spokane offers developers the opportunity to leverage limited City of Spokane HOME funding with Low-Income Housing Tax Credits, housing bonds, Washington State Housing Trust Fund dollars, and Federal Home Loan Bank grants. Typically, City of Spokane HOME funds account for only a fraction of the total cost but deliver large projects providing many long-term affordable rental housing units.

The City of Spokane maintains its HOME investment in affordable housing by monitoring rental housing occupancy and physical condition over HUD's minimum compliance periods required by 24 CFR 92.254. The City of Spokane reserves the right to impose an additional 10-year local compliance period to retain these rental units as affordable housing available to low-income households. The City of Spokane grants and loans CDBG funds to repair low-income owner-occupied homes enabling existing homeowners to enjoy a safe and healthy home that they can afford to operate and maintain. The City of Spokane plans to address foreclosed, abandoned, and derelict properties by acquisition and/or renovation to create affordable homeownership opportunities.

The CHHS Department has set a goal to utilize the Community Housing Development Organization (CHDO) set asides from 2018 through 2023 to encourage the development of a CHDO agreement and funding of affordable housing using CHDO reserves as soon as possible. Those projects will provide an

additional opportunity to comment, outside of the annual action plan and will become substantial amendments, to be annuanced in the following year.

Actions planned to reduce lead-based paint hazards

Spokane's Single-Family Rehabilitation and Multifamily Housing programs are active in identifying and repairing lead-based paint hazards in eligible owner and renter housing. HUD Title X and EPA Renovator (RRP) requirements are integrated into CDBG and HOME funded programs that rehabilitate housing units constructed prior to 1978. Typical lead hazard control begins with an XRF lead inspection to guide the scope of work. Certified workers complete lead hazard control work in compliance with HUD's Title X and EPA RRP regulations. These projects typically include wet scraping, painting, eliminating friction/impact surfaces, mulching bare soil, and cleaning to Clearance. Each rehabilitated housing unit will achieve clearance as part of project completion, as proscribed by HUD's Title X regulation.

Actions planned to reduce the number of poverty-level families

The City's anti-poverty strategies are implemented through the following established goals of the Consolidated Plan. The CDBG and HOME program are the principal funding sources targeted at reducing the number of poverty-level families, but the ESG program also seeks to stabilize families and individuals at-risk of becoming homeless or experiencing homelessness. Importantly, the resource management responsibilities of these programs provide staff of the Department of Community, Housing and Human Services an opportunity to facilitate coordination among a range of social and housing programs, operated by other City of Spokane departments, governmental agencies, and the nonprofit community, that together enhance the opportunities to reduce poverty for families.

CDBG program resources are targeted to meet the community development, infrastructure and economic opportunities needs in the community. Public services activities include programs for stabilizing families, while the housing rehabilitation program reduces and stabilizes low- and moderate-income homeowner's housing expenses. CDBG public services activities, such as the housing counseling program and the rental assistance case management program, assist low- and moderate-income families on the edge of poverty to help them to economic security.

HOME program resources are allocated to address the needs for safe, affordable housing. Program activities that are designed to reduce housing expenses and offer the opportunity to help move families out of poverty are tenant-based-rental assistance and the multifamily development program, which maintains and expands affordable housing. These rental support programs help provide economic stability to the households assisted and are key to the goal of reducing the number of families facing poverty.

Actions planned to develop institutional structure

New leadership at the City of Spokane is focused on developing the institutional structure to administer

Annual Action Plan

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CDBG and HOME Programs. Consistent applicant workshops and consistent timelines are being produced to provide predictability and encourage public participation on all plans and funding recommendations. The Department of Equity and Inclusion has developed a tool for departments to use to ensure there is no implicit bias within plans or funding recommendations. Compliance with regulations is high priority, along with timeline expenditures and reporting.

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

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

Examples include:

- Multi-family Housing: the City of Spokane works closely with Spokane County, the WA State
 Department of Commerce, and the WA State Housing Finance Commission to coordinate the
 funding, development and monitoring of multi-family housing units funded through the HOME
 program.
- Tenant-Based Rental Assistance: the City is seeking partners to administer TBRA with the HOME ARP Program.

The City of Spokane is the lead agency and the Collaborative Applicant for the Spokane/Regional Continuum of Care. The City of Spokane coordinates a number of homelessness reduction system-wide strategies involving both public and private agencies such as Coordinated Assessment, Housing First, Permanent Supportive Housing, Transitional Housing, and Rapid Re-housing through the Continuum of Care.

Discussion:

The City of Spokane affirmatively furthers fair housing in all funded projects and activities. CHHS is trained in fair housing to assist with understanding, identifying, and reporting fair housing concerns to Northwest Fair Housing Alliance, The Washington State Human Rights Commission and HUD Fair Housing and Equal Opportunity Department. The City of Spokane has a Human Rights Commission that provides oversight to any concerns brought to them, assisting with referrals to agencies who can assist people concerned about equal rights and fair housing in City programs. Northwest Fair Housing Alliance is updating the City's Fair Housing Plan and it will be adopted prior to the beginning of the 2024 Program Year.

Program Specific Requirements

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

Introduction:

See narratives below for additional information about the Community Development Block Grant Program (CDBG), HOME Program, and Emergency Solutions Grant Program (ESG).

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

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

 The total amount of program income that will have been received before the start of the ne 	xt
program year and that has not yet been reprogrammed	0
2. The amount of proceeds from section 108 loan guarantees that will be used during the year	to
address the priority needs and specific objectives identified in the grantee's strategic plan.	0
3. The amount of surplus funds from urban renewal settlements	0
4. The amount of any grant funds returned to the line of credit for which the planned use has r	not
been included in a prior statement or plan	0
5. The amount of income from float-funded activities	0
Total Program Income:	0
Other CDBG Requirements	
1. The amount of urgent need activities	0
2. The estimated percentage of CDBG funds that will be used for activities that	
2. The estimated percentage of CDBG funds that will be used for activities that benefit persons of low and moderate income. Overall Benefit - A consecutive period	
benefit persons of low and moderate income. Overall Benefit - A consecutive period	

HOME Investment Partnership Program (HOME) Reference 24 CFR 91.220(I)(2)

1. A description of other forms of investment being used beyond those identified in Section 92.205 is

as follows:

Spokane does not plan to directly use other forms of investment beyond those listed in 92.205.

2. A description of the guidelines that will be used for resale or recapture of HOME funds when used for homebuyer activities as required in 92.254, is as follows:

HOME regulation 92.254 describes qualifications of homeownership activities as affordable housing. City of Spokane has not budgeted HOME funds for homeownership activities. The City of Spokane retains written agreements used in a previous homeownership program. These agreements include a recapture provision triggered if a borrower sells, transfers, refinances, or changes the use of the property during the HOME period of affordability. This loan provision limits recaptured funds to net proceeds available from the sale rather than the entire HOME investment. The City's Single Family Rehabilitation program uses this same loan recapture provision which limits recaptured funds to net proceeds of a sale. Consequently, the City is not required to repay HUD should any sale, short sale, foreclosure, involuntary sale, etc. of a program-assisted home provide insufficient funds to fully repay the amount of loaned HUD funding.

3. A description of the guidelines for resale or recapture that ensures the affordability of units acquired with HOME funds? See 24 CFR 92.254(a)(4) are as follows:

HOME regulation 92.254(a)(4) describes the minimum HOME period of affordability based upon the amount of HOME homeownership assistance. The City of Spokane has not budgeted HOME funds for homeownership activities. The City previously established maximum HOME assistance for each homebuyer transaction and that HOME assistance required a 10-year period of affordability. Earlier homeownership assistance loan documents provided some debt forgiveness over the 10-year HOME affordability period. All City homeownership assistance written agreements included a recapture provision that triggered repayment if a borrower sells, transfers, refinances, or changes the use of the property during the HOME period of affordability. This recapture provision limits recaptured funds to any net proceeds available from the sale rather than the entire HOME investment.

Similarly, HOME-funded affordable rental housing projects include acquisition, new construction, and/or renovation trigger minimum periods of affordability per 24 CFR 92.252(e). New construction projects are always subject to the regulation's 20-year affordability period but acquisition and/or rehab projects commonly trigger a 5, 10, or 15-year HOME affordability period. The City of Spokane reserves the right to impose additional years of affordability that will run concurrently with the HOME affordability period. These City-imposed affordability periods are described further in the HOME Multifamily Housing Program Description and agreements.

4. Plans for using HOME funds to refinance existing debt secured by multifamily housing that is

Annual Action Plan 2024 rehabilitated with HOME funds along with a description of the refinancing guidelines required that will be used under 24 CFR 92.206(b), are as follows:

HOME funds will not be used to refinance existing debt secured by housing that is being rehabilitated with HOME funds under 24 CFR 92.206(b). However, HOME funds may be used to pay off principal and interest of a construction loan, bridge financing loan, or guaranteed loan as provided under 24 CFR 92.206(g).

5. If applicable to a planned HOME TBRA activity, a description of the preference for persons with special needs or disabilities. (See 24 CFR 92.209(c)(2)(i) and CFR 91.220(l)(2)(vii)).

A portion of HOME ARP funds will be used to provide TBRA and will be available to all qualified populations as required by HOME ARP regulations.

6. If applicable to a planned HOME TBRA activity, a description of how the preference for a specific category of individuals with disabilities (e.g. persons with HIV/AIDS or chronic mental illness) will narrow the gap in benefits and the preference is needed to narrow the gap in benefits and services received by such persons. (See 24 CFR 92.209(c)(2)(ii) and 91.220(l)(2)(vii)).

HOME ARP does not allow preference for the use of TBRA.

7. If applicable, a description of any preference or limitation for rental housing projects. (See 24 CFR 92.253(d)(3) and CFR 91.220(l)(2)(vii)). Note: Preferences cannot be administered in a manner that limits the opportunities of persons on any basis prohibited by the laws listed under 24 CFR 5.105(a).

Emergency Solutions Grant (ESG) Reference 91.220(I)(4)

1. Include written standards for providing ESG assistance (may include as attachment)

The Emergency Solutions Grant funds, in conjunction with additional funding sources, are currently funding Coordinated Assessment Initiatives through rapid re-housing, and shelter activities. The attached program standards have been developed with community feedback, based on the feedback from CoC programs administering these funded activities. The standards continue to consider the smaller resources and even greater targeting needed for ESG. These standards are included in program specific guidelines for all ESG funded programs.

2. If the Continuum of Care has established centralized or coordinated assessment system that

meets HUD requirements, describe that centralized or coordinated assessment system.

Households seeking homeless assistance can access services through the Spokane Continuum of Care's Coordinated Assessment (CA) system. The local CA system operates two portals to better meet the disparate needs of different household types. Households with minor children are served through Homeless Families Coordinated Assessment (HFCA) system, which coordinates all family homeless service programs to provide prevention and rapid re-housing assistance in addition to placement in interim, transitional, and permanent supportive housing, if applicable. The program utilizes the Service Prioritization Decision Assistance Tool (VI SPDAT) to assess families for appropriate housing and service interventions based on vulnerability rather than a first come first serve model. The VI SPDAT provide a consistent way of assessing households across the Continuum of Care and assists HFCA in connecting families with an appropriate housing intervention based on their level of need.

Households without children can access services through the Singles Homeless Coordinated Assessment (SHCA) System. SHCA operates as a decentralized assessment system with a lead agency to facilitate the training and coordination of assessment sites. SHCA also uses the SPDAT tool to provide common outcome data and measurable results. Once the appropriate assessment is completed in HMIS, a housing referral can be made to the appropriate housing track based on the household's vulnerability and desired housing intervention.

Households may access the program through one of two entry points:

- 1. By walking into either the HFCA or SHCA program offices for an assessment; or
- 2. Through targeted outreach and screening with a partnering service provider such as an emergency shelter or street outreach program.

Providers primarily serving victims of domestic violence, dating violence, sexual assault, and stalking are required to comply with the VAWA final rule and the locally adopted VAWA Written Standards, including Emergency Transfer Plan.

The CA system has been developed in accordance with the HUD Continuum of Care Regulations. Participation in this system is mandatory for ESG and CoC grantees.

3. Identify the process for making sub-awards and describe how the ESG allocation available to private nonprofit organizations (including community and faith-based organizations).

As the CoC Collaborative Applicant, the City of Spokane works with the Continuum of Care Governance Board and Community Housing and Human Services Board (CHHS), to determine priorities for homeless funding. The Request for Proposals (RFP) for ESG funding is published on the City of Spokane's website, in the local newspaper, is sent to an email distribution list of private non-profit organizations, homeless provider groups and to faith-based groups, and to the Homeless

Coalition. During the application process for homeless funding, the RFP and Evaluation Committee of CoC reviews applications and makes funding recommendations to CoC Governance Board. The CoC Governance Board then makes funding recommendations to the Spokane City Council. Once the City Council reviews and approves the recommendations, CHHS begins the contracting process with subrecipients. Following the execution of contracts, CHHS continues to monitor and support the subrecipients through the end of the contract term.

Applicants eligible to apply for ESG funds include:

- City or County governments
- Public and private nonprofit organizations (501(c)(3)
- Private for-profit organizations or individuals may implement certain economic development, lowincome housing rehabilitation and microenterprise activities
- Faith based organizations
- 4. If the jurisdiction is unable to meet the homeless participation requirement in 24 CFR 576.405(a), the jurisdiction must specify its plan for reaching out to and consulting with homeless or formerly homeless individuals in considering policies and funding decisions regarding facilities and services funded under ESG.

The City of Spokane currently meets the homeless participation requirement detailed in 24 CFR 576.405(1) through formerly homeless individuals' membership on the Community, Housing and Human Services Board subcommittees, Continuum of Care Governance Board, and the CoC RFP and Evaluation Committee. These committees are responsible for recommending policies and making funding decisions.

5. Describe performance standards for evaluating ESG.

All programs funded through ESG are evaluated for performance quarterly. Data for these evaluations is pulled from the Community Management Information System. In addition, all ESG funded programs are required to ensure CMIS data quality by the 5th of each month. Programs funded for rapid re-housing are measured by the percentage of households exiting to permanent housing, the percentage of households with increased income at exit, and the average length of time from identified eligibility to being housed. Programs funded for emergency shelter operations are required to enter universal data into the CMIS system and record entry and exit dates. In addition, these programs are measured by the percentage of households who exit from the emergency shelter into permanent housing, the average length of time individuals are homeless in emergency shelter, average length of time between enrollment and clients' date of engagement.

Citizens with additional questions regarding the CDBG, HOME and ESG Programs are encouraged to contact the Community, Housing and Human Services Department (CHHS) for additional information.

CHHS Contact Information:

- Email to CHHS at spokanechhs@spokanecity.org
- Phone CHHS at 625-6325
- Attend a Public Hearing and make comment directly to the CHHS Board
- Visit CHHS at Spokane City Hall at 808 W. Spokane Falls Blvd, Spokane, WA 99201