FIRST YEAR ACTION PLAN

INTRODUCTION (AP15)

The following priority tables list the expected entitlement grant funds, prior year funding and program income that have been allocated to programs and activities in the 2015 Action Plan.

EXPECTED RESOURCES

Estimate of resources available through the remainder of the Plan based on 2015 allocation.

Table 1: Expected Resources Priority Table

	Source		Ехр	ected Amount	Available Ye	ar 1	Amount	
Program	of Funds	Uses of Funds	Annual Allocation	Program Income	Prior Year Resources	Total	Available Remainder of Plan	
CDBG	Federal	Acquisition; Admin and planning; Housing; Public improvements Public services; Economic development	\$2,997,960	\$1,000,000	\$968,457	\$4,966,417		
HOME	Federal	Admin and planning; Homebuyer assistance; New construction for homeownership; Homeowner rehab; Multifamily rental rehab; TBRA	\$888,961	\$100,000	\$0	\$988,961		
ESG	Federal	Overnight shelter; Rapid rehousing (rental assistance)	\$268,994	\$0	\$0	\$268,994		

Leveraging Funds and Matching Requirements (AP15)

The City of Spokane will accrue match related to the CHG, HOME, and ESG programs. The City will use Consolidated Homeless Grant funds through the Washington State Department of Commerce and City of Spokane Homeless Housing Assistance Act grant funds to match the ESG 2015 allocation. HOME match is calculated at the program level and is required for most HOME activities, including tenant-based rental assistance, homeownership, and the development (acquisition, rehabilitation, or construction) of affordable rental units. Match is generated when affordable rental unit development leverages other non-federal, non-owner funds. Some sources of leverage and match have declined recently, such as below-market-rate bank loans, State housing trust fund allocations, and grants. Local real estate tax reductions are available to some affordable housing projects, which add to eligible match. Fortunately, unused HOME match contributions from prior years will be carried over and local developers may obtain funds that count toward match contributions. The City currently has over \$11 million in carryover match which easily fulfills the estimated 2015-2016- HOME match obligation of \$200,000, which is 25% of the estimated 2015 allocation of \$889,000 (less 10% for administration).

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 owns several residential properties and vacant parcels which were purchased using program income earned from loans made under previous United States Department of Housing and Urban Development (HUD) grants. The City is currently finalizing a property disposition policy and procedures for these properties to ensure they achieve the purpose of benefiting low and moderate income households or neighborhoods through transfer to another entity or sale with sale proceeds being returned to the City's CDBG line of credit with HUD for re-allocation to activities in future years' action plans.

ANNUAL GOALS AND OBJECTIVES

Table 2: Goals Summary

Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
Expand safe,	2015	2016	Affordable	N/A	Safe affordable	CDBG:	Rental units
affordable			housing;	,	housing choice	\$2,558,920	rehabilitated 80
housing			Public housing		_	HOME:	household housing
choices						\$900,065	units; Homeowner
							housing rehabilitated
							367 household housing
							units; Rental units
							constructed 23
							household housing
							units; Tenant-based
							rental assistance/rapid
							rehousing 20
							households assisted
Prevent and	2015	2016	Homeless;	N/A	Basic and	CDBG:	Public facility or
reduce			non-homeless		special needs	\$387,829	infrastructure activities
homelessness			special needs		and reduce	ESG:	for low/moderate-
					homelessness	\$249,000	income housing benefit
							168 persons assisted;
							Public service activities
							other than low/
							moderate-income
							housing benefit 376
							persons assisted;
							Tenant-based rental
							assistance/Rapid
							rehousing 60
							households assisted;
							Homeless person
							overnight shelter 630
							persons assisted
Provide	2015	2016	Homeless	N/A	Basic and	CDBG:	Public facility or
opportunities			Non-homeless		special needs	\$133,698	infrastructure activities
to improve			special needs		and reduce		other than
quality of life					homelessness		low/moderate-income
							housing benefit 45,334
							persons assisted; Public

							service activities other than low/moderate income housing benefit 110,903 persons assisted
Support vibrant neighborhoods	2015	2016	Non-housing community development	N/A	Community development and economic opportunities	CDBG: \$1,075,414	Public facility or infrastructure activities other than low/moderate-income housing benefit 148,488 persons assisted; Public service activities other than low/moderate income housing benefit 25,720 persons assisted
Expand economic opportunities	2015	2016	Economic development	N/A	Community development and economic opportunities	CDBG: \$210,964	Public service activities other than low/moderate income housing benefit 58 persons assisted; Businesses assisted 75 businesses assisted

PROJECTS

Introduction (AP35)

The following table lists the 2015 projects and activities that have been recommended for funding in the 2015 Annual Action Plan. The City of Spokane intends to spend approximately 46% of formula program allocations on activities that support safe and affordable housing choices, 24% on activities that support the need for community development, infrastructure and economic opportunities and 16% on activities that support the need to reduce homelessness and provide for basic needs. The remaining 14% will be spent on activities relating to program administration.

Table 3: Project Information

Project #	Project Name			
1	Access Small Business Development			
2	Adult Treatment Services - STEPPS			
3	Ash Street Training Station and Greenhouse			
4	Business Round Table and Pathways to Employment Grant			
5	Capital Improvements in TH and PSH			
6	Collaborative Solutions to Homelessness			
7	Community Center Support			
8	Courtview Acquisition and Rehab			
9	Erie Street Paving - 1st Ave to MLK Jr Way			
10	Essential Home Repair Program with TIP focus area			
11	Fair Housing Activities			

12	Housing Counseling Program
13	Kitchen Improvments at 2nd Harvest
14	Lutheran Community Services Security
15	Multifamily Housing Program (including CHDO)
16	Open Center Saturday
17	Peaceful Valley Community Center Programs
18	Various Neighborhood Park Projects
19	Pioneer Pathway House Building Improvements
20	CDBG Admin
21	ESG Projects
22	HOME Admin
23	Rental Assistance Case Management
24	Various Neighborhood Street and Sidewalk Projects
25	Tennant Based Rental Assistance (TBRA)
26	Transitions Miryam's House Capital CHED
27	Transitions New Leaf Bakery Cafe and Women's Hearth
28	Transitions TLC
29	Triplexes: Green Gables
30	Various Community Center Capital Improvements
31	West Central Community Center Operations
32	West Central Community Center Youth Development and Recreation
33	Transitions Women's Hearth Building Improvements
34	Youth Entrepreneurship Program (YEP)
35	Single Family Rehab

AP-38 Projects Summary: Project Summary Information

1	Project Name	Access Small Business Development
	Goals Supported	Expand economic opportunities
	Needs Addressed	Community Development, Infrastructure and Economic Opportunities
	Location Description	500 S. Stone St.
	Funding	CDBG: \$166,964.00
	Indicator/Outcome	Businesses assisted; 35 businesses assisted
	Project Name	Adult Treatment Services - STEPPS
	Goals Supported	Provide opportunities to improve quality of life
	Needs Addressed	Provide for Basic/Special Needs and Reduce Homelessness
2	Location Description	22 S. Thor St.
	Funding	CDBG: \$10,000.00
	Indicator/Outcome	Public service activities other than Low/Moderate Income Housing Benefit; 350 persons assisted
	Project Name	Ash Street Training Station and Greenhouse
	Goals Supported	Provide opportunities to improve quality of life
	Needs Addressed	Provide for Basic/Special Needs and Reduce Homelessness
3	Location Description	1925 N. Ash St.
	Funding	CDBG: \$20,000.03
	Indicator/Outcome	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit; 75 persons assisted
	Project Name	Business Round Table and Pathways to Employment Grant
	Goals Supported	Expand economic opportunities
	Needs Addressed	Community Development, Infrastructure and Economic Opportunities
4	Location Description	211 W. Augusta Ave.
	Funding	CDBG: \$20,000.00
	Indicator/Outcome	Public service activities other than Low/Moderate Income Housing Benefit; 58 Persons Assisted
	Project Name	Capital Improvements in TH and PSH
	Goals Supported	Prevent and Reduce Homelessness
	Needs Addressed	Provide for Basic/Special Needs and Reduce Homelessness
5	Location Description	820 N. Summit Blvd., 101 E. Hartson Ave.
	Funding	CDBG: \$243,278.00
	Indicator/Outcome	Public Facility or Infrastructure Activities for Low/Moderate Income Housing Benefit; 45 Households Assisted

	Project Name	Collaborative Solutions to Homelessness
6	Goals Supported	Prevent and Reduce Homelessness
	Needs Addressed	Provide for Basic/Special Needs and Reduce Homelessness
	Location Description	12 E. 5th Ave.
	Funding	CDBG: \$50,000.00
	Indicator/Outcome	Public service activities other than Low/Moderate Income Housing
	Project Name	Benefit; 126 persons assisted Community Center Support
	Goals Supported	Support vibrant neighborhoods
	Needs Addressed	Community Development, Infrastructure and Economic Opportunities
7	Location Description	500 S. Stone St.
	Funding	CDBG: \$140,000.00
	Indicator/Outcome	Public service activities other than Low/Moderate Income Housing
	,	Benefit; 17,095 persons assisted
	Project Name	Courtview Acquisition and Rehab
	Goals Supported	Preserve and expand quality, safe, affordable housing choices
8	Needs Addressed	Safe, Affordable Housing Choice
8	Location Description	1217 N. Monroe St.
	Funding	CDBG: \$250,000.00
	Indicator/Outcome	Rental units rehabilitated; 14 Household / Housing Units
	Project Name	Erie Street Paving - 1st Ave to MLK Jr. Way
	Goals Supported	Support vibrant neighborhoods
	Needs Addressed	Community Development, Infrastructure and Economic Opportunities
9	Location Description	Erie Street: 1st Ave. to MLK Jr. Way
	Funding	CDBG: \$147,875.72
	Indicator/Outcome	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit; 18,375 persons assisted
	Project Name	Essential Home Repair Program with TIP focus area
	Goals Supported	Preserve and expand quality, safe, affordable housing choices
10	Needs Addressed	Safe, Affordable Housing Choice
10	Location Description	Citywide (multiple)
	Funding	CDBG: \$468,418.00
	Indicator/Outcome	Homeowner Housing Rehabilitated; 332 Household / Housing Units
	Project Name	Fair Housing Activities
	Goals Supported	Provide opportunities to improve quality of life
	Needs Addressed	Provide for Basic/Special Needs and Reduce Homelessness
11	Location Description	Citywide (multiple)
	Funding	CDBG: \$5,000.00
	Indicator/Outcome	Public service activities other than Low/Moderate Income Housing Benefit; 109,950 Persons Assisted

	Project Name	Housing Counseling Program	
12	Goals Supported	Provide opportunities to improve quality of life	
	Needs Addressed	Provide for Basic/Special Needs and Reduce Homelessness	
	Location Description	500 S. Stone St.	
	Funding	CDBG: \$32,665.00	
	Indicator/Outcome	Public service activities other than Low/Moderate Income Housing	
		Benefit; 325 Persons Assisted	
	Project Name	Kitchen Improvements at 2nd Harvest	
	Goals Supported	Provide opportunities to improve quality of life	
	Needs Addressed	Provide for Basic/Special Needs and Reduce Homelessness	
13	Location Description	1234 E. Front Ave.	
	Funding	CDBG: \$12,398.00	
	Indicator/Outcome	Public Facility or Infrastructure Activities other than Low/Moderate	
		Income Housing Benefit; 44,000 persons assisted	
	Project Name	Lutheran Community Services Security	
	Goals Supported	Support vibrant neighborhoods	
	Needs Addressed	Community Development, Infrastructure and Economic Opportunities	
14	Location Description	210 W. Sprague Ave.	
	Funding	CDBG: \$7,000.00	
	Indicator/Outcome	Public Facility or Infrastructure Activities other than Low/Moderate	
		Income Housing Benefit; 3,428 persons assisted	
	Project Name	Multifamily Housing Program (including CHDO)	
	Goals Supported	Preserve and expand quality, safe, affordable housing choices	
15	Needs Addressed	Safe, Affordable Housing Choice	
	Location Description	Citywide	
	Funding	HOME: \$800,065.00	
	Indicator/Outcome	12 Household / Housing Units	
	Project Name	Open Center Saturday	
	Goals Supported	Provide opportunities to improve quality of life	
	Needs Addressed	Provide for Basic/Special Needs and Reduce Homelessness	
16	Location Description	3004 E. Queen Ave.	
	Funding	CDBG: \$10,000.00	
	Indicator/Outcome	Public service activities other than Low/Moderate Income Housing	
		Benefit; 100 persons assisted	
	Project Name	Peaceful Valley Community Center Programs	
	Goals Supported	Support vibrant neighborhoods	
	Needs Addressed	Community Development, Infrastructure and Economic Opportunities	
17	Location Description	214 N. Cedar St.	
	Funding	CDBG: \$20,000.00	
	Indicator/Outcome	Public service activities other than Low/Moderate Income Housing	
		Benefit; 90 persons assisted	

	Project Name	Various Neighborhood Park Projects
18	Goals Supported	Support vibrant neighborhoods
	Needs Addressed	Community Development, Infrastructure and Economic Opportunities
	Location Description	Citywide (multiple)
	Funding	CDBG: \$49,710.08
	Indicator/Outcome	Public Facility or Infrastructure Activities other than Low/Moderate
		Income Housing Benefit; 30,155 persons assisted
	Project Name	Pioneer Pathway House Building Improvements
	Goals Supported	Preserve and expand quality, safe, affordable housing choices
19	Needs Addressed	Safe, Affordable Housing Choice
19	Location Description	222 S. Howard St.
	Funding	CDBG: \$109,150.00
	Indicator/Outcome	Rental units rehabilitated; 39 Households / Housing Units
	Project Name	CDBG Admin
	Goals Supported	
20	Needs Addressed	
20	Location Description	
	Funding	CDBG: \$599,592.00
	Indicator/Outcome	
	Project Name	ESG Projects
	Goals Supported	Prevent and Reduce Homelessness
21	Needs Addressed	Provide for Basic/Special Needs and Reduce Homelessness
21	Location Description	Citywide (multiple)
	Funding	ESG: \$268,994.00
	Indicator/Outcome	890 persons assisted
	Project Name	HOME Admin
	Goals Supported	
22	Needs Addressed	
	Location Description	
	Funding	HOME: \$88,896.00
	Indicator/Outcome	
	Project Name	Rental Assistance Case Management
	Goals Supported	Provide opportunities to improve quality of life
	Needs Addressed	Provide for Basic/Special Needs and Reduce Homelessness
23	Location Description	845 S Sherman St.
	Funding	CDBG: \$25,000.00
	Indicator/Outcome	Public service activities other than Low/Moderate Income Housing Benefit; 58 Persons Assisted

	Project Name	Various Neighborhood Street and Sidewalk Projects
24	Goals Supported	Support vibrant neighborhoods
	Needs Addressed	Community Development, Infrastructure and Economic Opportunities
	Location Description	Citywide (multiple)
	Funding	CDBG: \$511,275.50
	Indicator/Outcome	Public Facility or Infrastructure Activities other than Low/Moderate
		Income Housing Benefit; 66,765 persons assisted
	Project Name	Tennant Based Rental Assistance
	Goals Supported	Preserve and expand quality, safe, affordable housing choices
25	Needs Addressed	Safe, Affordable Housing Choice
23	Location Description	Citywide
	Funding	HOME: \$100,000.00
	Indicator/Outcome	20 households assisted
	Project Name	Transitions Miryam's House Capital CHED
	Goals Supported	Prevent and Reduce Homelessness
	Needs Addressed	Provide for Basic/Special Needs and Reduce Homelessness
26	Location Description	1805 W. 9th Ave.
	Funding	CDBG: \$23,135.00
	Indicator/Outcome	Public Facility or Infrastructure Activities for Low/Moderate Income
		Housing Benefit; 23 households assisted
	Project Name	Transitions New Leaf Bakery Cafe and Women's Hearth
	Goals Supported	Prevent and Reduce Homelessness
	Needs Addressed	Provide for Basic/Special Needs and Reduce Homelessness
27	Location Description	920 W 2nd Ave., 3128 N. Hemlock St.
	Funding	CDBG: \$45,000.00
	Indicator/Outcome	Public service activities other than Low/Moderate Income Housing Benefit; 50 persons assisted
	Project Name	Transitions TLC
	Goals Supported	Prevent and Reduce Homelessness
	Needs Addressed	Provide for Basic/Special Needs and Reduce Homelessness
28	Location Description	3128 N. Hemlock St.
	Funding	CDBG: \$26,416.00
	Indicator/Outcome	Public Facility or Infrastructure Activities for Low/Moderate Income
		Housing Benefit; 100 households assisted
	Project Name	Triplexes: Green Gables
	Goals Supported	Preserve and expand quality, safe, affordable housing choices
20	Needs Addressed	Safe, Affordable Housing Choice
29	Location Description	E 1700 block of Boone and Desmet Ave.
	Funding	CDBG: \$250,000.00
	Indicator/Outcome	Rental units rehabilitated; 27 Households / Housing Units

	Project Name	Various Community Center Capital Improvements
30	Goals Supported	Support vibrant neighborhoods
	Needs Addressed	Community Development, Infrastructure and Economic Opportunities
	Location Description	Citywide (multiple)
	Funding	CDBG: \$109,552.35
	Indicator/Outcome	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit; 29,765 persons assisted
	Project Name	West Central Community Center Operations
	Goals Supported	Support vibrant neighborhoods
	Needs Addressed	Community Development, Infrastructure and Economic Opportunities
31	Location Description	1603 N. Belt St.
	Funding	CDBG: \$90,000.00
	Indicator/Outcome	Public service activities other than Low/Moderate Income Housing Benefit; 8,535 persons assisted
	Project Name	West Central Community Center Youth Development and Recreation
	Goals Supported	Provide opportunities to improve quality of life
	Needs Addressed	Provide for Basic/Special Needs and Reduce Homelessness
32	Location Description	1603 N. Belt St.
	Funding	CDBG: \$10,000.00
	Indicator/Outcome	Public service activities other than Low/Moderate Income Housing Benefit; 120 persons assisted
	Project Name	Transitions Women's Hearth Building Improvements
	Goals Supported	Provide opportunities to improve quality of life
	Needs Addressed	Provide for Basic/Special Needs and Reduce Homelessness
33	Location Description	920 W. 2nd Ave.
	Funding	CDBG: \$8,634.97
	Indicator/Outcome	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit; 1,259 persons assisted
	Project Name	Youth Entrepreneurship Program (YEP)
	Goals Supported	Expand economic opportunities
34	Needs Addressed	Community Development, Infrastructure and Economic Opportunities
34	Location Description	500 S. Stone St.
	Funding	CDBG: \$24,000.00
	Indicator/Outcome	Businesses assisted; 40 Businesses assisted
	Project Name	Single Family Rehab
	Goals Supported	Preserve and expand quality, safe, affordable housing choices
35	Needs Addressed	Safe, Affordable Housing Choice
	Location Description	Citywide (multiple)
	Funding	CDBG: \$1,481,352.00
	Indicator/Outcome	Homeowner Housing Rehabilitated; 35 Households / Housing Units

Allocation Priorities and Barriers (AP35)

The Community, Housing and Human Services (CHHS) Board adopts annual funding priorities in conjunction with Spokane City Council to target community needs. In 2015, the Board adopted 3 primary needs to focus funding priorities. The 3 needs are: Safe affordable housing choice; Need to reduce homelessness and provide basic needs; and Need for community development, infrastructure and economic opportunities.

The primary obstacles in addressing underserved needs include limitations on funding. The CHHS Board is prioritizing projects that can demonstrate ability to: Preserve and expand quality, safe, and affordable housing choices; Prevent and reduce homelessness; Provide opportunities to improve quality of life; Support vibrant neighborhoods; and Expand economic opportunities.

GEOGRAPHIC DISTRIBUTION (AP50)

The City of Spokane allocates approximately 30% of the Community Development Block Grant award to neighborhood programs each year. The neighborhood program consists of 27 individual neighborhood councils throughout the city. CHHS staff works with a citizen advisory committee to develop an allocation methodology that targets areas where the number of low and moderate income individuals exceeds 51%. 2015 is the first year that all 27 neighborhoods have access to CDBG funds for community development activities. Neighborhood councils have targeted projects that primarily benefit low and moderate income populations as defined by HUD's most recent Low and Moderate Income Summary Data (2006-2010 American Community Survey).

The City of Spokane recognizes the benefit of investing in strategic geographic areas. In 2014, the Spokane City Council identified a geographic area along East Sprague Avenue. The area selected for targeted investment consists of a high percentage (77%) of individuals meeting HUD's low and moderate income threshold (individuals earning less than 80% area median income). For purposes of this Action Plan, the City has not designated HUD-approved geographic target areas. In the future, the City anticipates undertaking activities in areas with multiple needs being addressed. In addition, the City will continue to focus improvements on areas that qualify because of concentrations of lower-income households.

AFFORDABLE HOUSING

Introduction (AP55)

The City of Spokane's strategy to address safe, affordable housing choices is based on the goal of preserving and expanding quality, safe, affordable housing choices. The following populations will be targeted to achieve this goal:

- Income: extremely low, very low, low, and moderate
- Family types: large families, families with children, and the elderly

- Homeless: chronic homelessness, individuals, families with children, mentally ill, veterans, victims of domestic violence and unaccompanied youth
- Non-homeless special needs: persons with mental disabilities, persons with physical disabilities, persons with developmental disabilities and victims of domestic violence

During the 2015 program year, the following goals for affordable housing production have been identified. The City will continue its efforts to efficiently allocate its available resources while, at the same time, pursue additional funding sources and jurisdictional collaborations.

Table 4: One Year Goals for Affordable Housing by Support Requirements

One-Year Goals for the Number of Households to be Supported			
Homeless	110		
Non-homeless	190		
Special needs	0		
Total	300		

Table 5: One Year Goals for Affordable Housing by Support Type

One-Year Goals for the Number of Households to be Supporte				
Rental assistance	60			
Production of new units	20			
Rehab of existing units	170			
Acquisition of existing units	0			
Total	250			

Discussion (AP55)

The City anticipates primarily assisting homeless households with Continuum of Care, Emergency Solutions Grant and HOME's TBRA funds with leverage from HOME affordable rental housing units. Nonhomeless households will receive assistance from the HOME-funded Multifamily Housing Program rental housing and CDBG-funded Single Family Rehabilitation program.

PUBLIC HOUSING

Introduction

Spokane Housing Authority (SHA) began in 1972 as the Housing Authority of the City of Spokane is now a multi-jurisdictional agency serving many cities and five 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 six-member Board of Commissioners to include a resident commissioner appointed by the Mayors of the cities of Spokane and Spokane Valley, and the Chairperson of 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 to Support Public Housing Needs (AP60)

The Department of Housing and Urban Development (HUD) Capital Fund Program has been underfunded for many years; therefore the revitalization needs for both the Parsons and Scattered site units is seen as significant. No detailed Capital Needs Assessment (CNA) has yet been completed for the 75 scattered site units; however, an inspection score of 62c reflects significant capital needs. A CNA for the Parsons was completed in 2014 and it identified approximately \$850,000 in needed rehabilitation. SHA has submitted and received preliminary approval to participate in the HUD Rental Assistance Demonstration (RAD) Program. SHA's RAD application includes:

- The redevelopment and recapitalization of the Parsons using 4% tax credits and bonds, which will address the deferred capital needs of the building and preserve the 50 affordable units using private equity and project-based housing choice vouchers.
- The disposition (sale) of all 75 scattered site units. Proceeds received from the sale of the scattered site units will be used as gap financing in the acquisition and rehabilitation or new construction of additional affordable housing units using tax credit and/or bond financing structures. It is anticipated that this could create as many as 300 affordable housing units over a period years. The 75 Project-Based Section 8 Housing Choice Vouchers received as a part of this transaction will be attached to units to be determined at a later date.

Actions to Encourage Residents (AP60)

To encourage the residents to become more involved with management, the PHA Annual Plan is available for review at the Public Housing leasing office during its public review time period. SHA does not currently have a program for public housing residents to participate in homeownership; however, it will be considering options in 2015 for how public housing participants might be able to access the Housing Choice Voucher Homeownership Program.

HOMELESS AND OTHER SPECIAL NEEDS ACTIVITIES (AP65)

Spokane's Regional Continuum of Care in its revised Strategic Plan to End Homelessness will focus on action steps aimed at obtaining the following Objectives: Increase Leadership, collaboration and civic engagement; Increase Access to Stable and Affordable Housing; Support effective pathways toward self-sufficiency and reduced financial vulnerability; Transform homeless services to crisis response systems leading to improved health and safety and Advance health and housing stability for youth experiencing homelessness, including unaccompanied homeless youth and youth aging out of systems such as foster care.

Assessing Individual Needs (AP65)

The Spokane Regional CoC has established system-wide performance goals and actions. Its revised Strategic Plan to End Homelessness focuses on objectives to reduce the length of time an individual is homeless; reduce the number of individuals returning to the homeless system; increase the percentage

of adults who gain or increase income; reduce the number of homeless for the first time; increase the number of housing placements directly from the streets; and increase retention in permanent housing.

In an effort to reach out to the unsheltered population, the communities' coordinated assessment system was created to focus on street outreach. The coordinated assessment system utilizes a tool that assesses a client's vulnerability and prioritizes those with the highest needs for PSH units. In order to meet the housing needs of the unsheltered population, the implementation of Housing First strategies throughout the system is currently being addressed. The efforts are part of the goal to transform homeless services into a crisis response system. In addition to the coordinated assessment system, the CoC funds a local initiative which provides outreach activities at hospitals to identify homeless high utilizers of emergency rooms and connect them with housing and health care.

The City of Spokane's CHHS Department and Code Enforcement Department work in conjunction with the Interagency Outreach committee to provide outreach to individuals occupying homeless encampments. This provides the opportunity for housing and support services to this chronically homeless unsheltered population.

Addressing Emergency Shelter and Transitional Housing Needs (AP65)

The CoC identifies the need to provide emergency response to families and individuals who are homeless and recognizes the continued need for shelter beds that are available when a person is unsheltered. Although the CoC is moving towards providing permanent housing options rather than temporary options, there are some special populations, such as youth, domestic violence victims, clients exiting institutions, and families with children involved with the child welfare system, who continue to benefit from a supportive transitional housing program.

The CoC continues to look at the housing needs of families and individuals as they enter the homeless system and consider these needs when recommending programmatic changes. The Homeless Families Coordinated Assessment System, which has been in place since October 2012, continues to show a lower need for long term temporary housing programs and an increased need for short-term temporary housing. With the increase in families who only need a short intervention to get back into housing through rapid re-housing, a short term emergency stay is needed as the family connects with the rapid re-housing program staff and housing is identified. As a result of this identified need, programs serving families with children have adapted their program models to serve any family who needs housing, no matter what their needs are. This interim housing model has allowed for maximum use of homeless housing inventory and reduction in the time families are homeless.

The efforts connect directly to the goals of transforming homeless services to a crisis response system and the system goal of reducing the length of time an individual or family is homeless.

Transitions to Permanent Housing and Homeless Prevention (AP65)

In 2013, ESG is funding rapid re-housing and emergency shelter operations. An intention shift to focus on permanent housing exits when an individual or household enters the homeless system has been transforming the City's homeless system over the past few years. Over 80% of families presenting as homeless at coordinated assessment only need a short term intervention to end their homelessness. As a result, much of the CoC efforts to serve homeless families are focused on rapid re-housing. Families who present as chronically homeless with very high barrier are placed directly into available PSH units. These efforts shorten the time families are homeless and increase stability.

The infusion of the Supportive Services for Veteran Families program into the community has provided an essential resource for Veterans and their families who are homeless or at risk. This program provides intensive outreach, housing search and placement and continued case management for this population. For Veterans who need more intensive housing services The 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.

Assistance with Discharge Housing and services (AP65)

The Health Homeless Housing Program (H3) is working with the following housing and health care partners on the implementation of the H3 program: City of Spokane Community, Housing and Human Services Department, 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 visit into homelessness. The Roads to Community Living Program coordinates with group homes, assisted living program and private landlords to ensure that long term Medicare eligible clients discharging from hospitals, nursing homes and mental health facilities are not being discharged into homelessness.

The Eastern Washington Regional Support Network (RSN) 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 Division of Children 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 DSFS Social Workers and other community stakeholders work with youth as they near 18 to establish an ILP to guide the services and housing assistance until they are 21.

Spokane County has taken the lead in housing individuals as they exit from correctional institutions. In the past year, through their partnership with SNAP, they have assessed 1,300 individuals and provided

permanent housing through a short term rental assistance program to persons exiting corrections. Airway Heights Corrections facility and the local jail works with Pioneer Human Services who operates a 55 bed work release facility for women and a 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. In addition Spokane County funds and operates the RE-Entry Initiative (REI) Program, a community re-entry program dedicated to transitioning people who were homeless and in institutional settings into productive citizens, working and living in homes with limited to no subsidy.

BARRIERS TO AFFORDABLE HOUSING (AP75)

The City of Spokane will identify and, where appropriate, remove or mitigate barriers to affordable housing resulting from zoning, subdivision, land use requirements, licensing, permits and utility extensions.

The City is working 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.

Efforts to be undertaken during the 2015 program year will include:

- Continue to develop Development Services Center (DSC) policies and public information resources
 through coordinated departmental action. The Permit Center allows the consolidation of all permit
 functions in one location to better coordinate the permit activities of Planning, Building, Fire and
 Engineering. These efforts expedite permitting processing and reduce permitting times providing
 cost savings for affordable housing development.
- Continue to use a pre-application process to provide project applications with an opportunity to discuss and understand the various codes and regulations that apply. The ability to review projects early expedites project design, thereby shortening the permitting process.
- Continue with the work that began in 2013 to review and update the City's Comprehensive Plan, including the Land Use and Housing Chapters. This may include reviewing population growth forecasts, land supply information and affordable housing needs, resources, goals and policies.
- Continue to improve the City's zoning rules and development standards through the code maintenance process. This may assist in reducing barriers to affordable housing.
- Continue to implement the Centers and Corridors land use strategy as proposed in the
 Comprehensive Plan. The Comprehensive Plan proposes establishing a number of centers and
 corridors throughout the community as part of an overall strategy to accommodate growth through
 infill development. Ultimately, these centers and corridors will accommodate mixed uses with
 residential development at higher densities, including affordable housing developments.

Discussion:

The City will continue to fund fair housing educational, and other, activities that support fair housing in a positive, solution-oriented manner. Potential activities may include sponsoring a regional Fair Housing

Conference, assisting the Spokane Association of Realtors (and the real estate industry in general, including the mortgage lending industry) with training related to fair housing. If the City becomes aware of clear violations of the Fair Housing Act, it will work with its community partners to identify potential resolutions. In addition, the CHHS Board is currently in the process of updating the City's 2008 Analysis of Impediments with release expected in early 2015.

OTHER ACTIONS

Introduction (AP85)

The following narratives speak to actions the City of Spokane will undertake during the 2015 program year to address obstacles toward achieving safe affordable housing choice, need to reduce homelessness and provide for basic needs, need for community development, infrastructure and economic opportunities.

Actions to Meet Underserved Needs (AP85)

The City of Spokane is working with local partner agencies and neighborhood councils to strategically target projects that will preserve and expand quality, safe and affordable housing choices; prevent and reduce homelessness; provide opportunities to improve quality of life; support vibrant neighborhoods and expand economic opportunities.

Actions toward Affordable Housing (AP85)

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

The City 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 imposes an additional 10-year local compliance period to retain these rental units as affordable housing available to low-income households. The City also 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.

Actions to Reduce Lead-Based Paint Hazards (AP85)

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. These programs coordinate with the Washington State Lead-Based Paint program for contractor certification, lead-safe renovation, and regulation technical assistance. Typical lead hazard control begins with a lead inspection to guide the scope of work. Contractors certified as Abatement Supervisor and EPA Renovators can complete projects in compliance with HUD's Title X regulation. These projects typically include wet scraping, painting, eliminating friction/impact surfaces, mulching bare soil, and cleaning to Clearance. This program year, most eligible pre-978 renovated housing units will receive an XRF Lead Inspection except where limited repairs are exempt or lead paint presumption is more cost effective. Each rehabilitated housing unit will achieve Clearance as part of project completion, as proscribed by HUD's Title X regulation.

Actions to Reduce Number of Poverty-Level Families (AP85)

The City's anti-poverty strategies include funding direct services as well as facilitating coordination among social programs, especially those that provide outcome driven, client centered services that lead to improved housing stability and economic security for low income families.

Annually, the City funds close to \$900,000 in human services programs through its general fund grant program, many of which provide direct services to low-income families. One of the key funding principles the board considered when evaluating the most recent round of proposals was how well each proposal articulated how their services incorporate efforts to move clients toward improved economic self-sufficiency and security.

Additionally, the City is currently leading a couple of targeted initiatives focused on low income families with multiple barriers to family stability and economic security. Specific examples include the Strong Families Initiative; which is a partnership between the City, the Housing Authority, the Child Welfare System and non-profit service providers. The program serves high-risk, homeless families whose children have been, or are at-risk of, being placed in out-of-home care through the child welfare system. Community-linked services are provided to selected families through the implementation of supportive housing services. In the first 10 months of this project 34 families have been served. As the project continues we expect to see a reduction in child welfare system contacts, reduction in child maltreatment and child removals, and reduced foster care placements. The partnership works closely with community housing providers and other critical service providers to bring a holistic approach to affordable housing and services to support independence and family cohesion.

In addition to the Strong Families Initiative, the City is leading the regional Coordinated Intake and Assessment Program for families. This coordinated system is designed to serve families with children who are experiencing homelessness or residential instability and are at high risk of homelessness. The system provides a more effective way for households to navigate the complex range of services and allows each household to be assessed and placed in appropriate services, rather than being placed in a program based solely on availability. The goal of this system is to reduce the number of families in Spokane who may become homeless by offering diversion services and lessen the length of time a

household is homeless by placing them with appropriate services at first contact. The program is funded by the City's Homeless Housing Assistance Act funds.

The Community, Housing and Human Services Board has expressed explicit interest in looking at best practice, innovative strategies to increase efforts to support job-growth, economic development and other anti-poverty strategies. The board is currently undertaking a needs analysis to determine what the community needs are, what the opportunities are, as well as what other communities have implemented that have had positive results. It's anticipated that the outcome of this analysis will be provided to the City Council for consideration as they adopt the funding priorities for the City's 2015 human services grant program.

Actions to Develop Institutional Structure (AP85)

The Community, Housing and Human Services Board consists of local citizen volunteers who fill an advisory role to the City of Spokane. Members of the Board represent private industry, nonprofit organizations, community and faith-based organizations, K-6 and higher education, local government and local neighborhood councils. The purpose of the Board is to act in an advisory role to City administration and City Council in regards to community development, housing and human services programs. Per City Ordinance, the Board is responsible for providing policy guidance in preparing the City's Consolidated Community Development and Housing Plan and Annual Action Plan, the Citizen Participation Plan, and the 10 Year Homeless Plan.

During 2014 and 2015, the Community, Housing and Human Services Board updated its Consolidated Plan by incorporating strategies and investments; so that investments are leveraged with other local, state and federal funds that lead to stronger projects with improved outcomes.

Actions to Enhance Coordination (AP85)

The City has established a number of 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 works closely with Spokane County and the WA State Department of Commerce to coordinate the funding and development of multi-family housing units funded through the HOME program.
- Tenant Based Rental Assistance: the City partners with the local housing authority to manage the HOME tenant based rental assistance program. The TBRA program has been prioritized for high needs households and individuals. Referrals to the TBRA program via the community Coordinated Assessment program. Support Services are provided for all TBRA households through CoC Program and local Homeless Housing Assistance Act funded programs.
- Fair Housing: the City partners with the local HUD office, Spokane County and the NW Fair Housing Alliance to fund, plan and host an annual Fair Housing Conference.

- Homeless/Housing/Health, i.e. H3: a City-lead partnership between the City, the two largest local
 hospital emergency departments, local funders and non-profit housing and services providers to
 improve the health and housing stability of the most vulnerable homeless individuals touching these
 systems on a frequent basis.
- Strong Families Initiative: a City-led partnership between the City, the Spokane Housing Authority, Child Protective Services and non-profit housing and services providers to improve the lives and housing stability of families engaged with child welfare.
- The City is the convener and the Collaborative Applicant for the City/County Continuum of Care. The
 City coordinates a number of homelessness reduction system-wide strategies involving both public
 and private agencies such as Coordinated Assessment, Housing First and Rapid Re-housing through
 the Continuum of Care.

PROGRAM SPECIFIC REQUIREMENTS

Introduction (AP90)

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.

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

1.	The total amount of program income that will have been received before the	\$0
	start of the next program year and that has not yet been reprogrammed	
2.	The amount of proceeds from Section 108 loan guarantees that will be used	\$0
	during the year to address the priority needs and specific objectives identified in	
	the grantee's strategic plan	
3.	The amount of surplus funds from urban renewal settlements	\$0
4.	The amount of any grant funds returned to the line of credit for which the	\$0
	planned use has not been included in a prior statement or plan	
5.	The amount of income from float-funded activities	\$0
Tot	tal 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	100%
	benefit persons of low and moderate income	100%

HOME Investment Partnership Program (HOME) Reference 24 CFR 91.220(I)(2) Other Investments (AP90)

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

Guidelines for Resale/Recapture of HOME Funds (AP90)

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 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. Other City home repair programs (e.g., Single Family Rehabilitation and Lead Safe Spokane) use this same loan recapture provision which limits any 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.

Guidelines Ensuring Affordability (AP90)

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 15-year HOME affordability period. The City chooses to independently extend the periods of affordability beyond the minimum required by HUD regulation. These City-imposed extended periods of affordability follow expiration of HUD-required minimum affordability periods for a 10 year period. These City-imposed affordability periods are described further in the HOME Multifamily Housing Program Description and agreements.

Refinancing Plans (AP90)

Plans for using HOME funds to refinance existing debt secured by multifamily housing that is rehabilitated with HOME funds along with a description of the refinancing guidelines required that will be used under 24 CFR 92.206(b), are as follows: 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).

Emergency Solutions Grant (ESG) Reference 24 CFR 91.220(I)(4)

Written Standards for Providing ESG assistance (AP90)

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 following program standards have been developed with community feedback, based on the feedback from CoC programs administering these funded activities. The standards continue to take into account the smaller resources and even greater targeting needed for ESG. These standards are included in program specific guidelines for all ESG funded programs.

a. Standard policies and procedures for evaluating individuals' and families' eligibility for assistance under Emergency Solutions Grant.

The City's local Homeless Families Coordinated Assessment Program, which began in October 2012, coordinates all family homeless service programs to provide prevention and rapid re-housing assistance in addition to placement in interim and permanent supportive housing, if applicable.

The program utilizes the Family Service Prioritization Decision Assistance Tool (F-SPDAT) and Family Vulnerability Index Service Prioritization Decision Assistance Tool (VI-FSPDAT) to assess families for appropriate housing and service interventions based on vulnerability rather than a first come first serve model. HFCA adopted the tool in December 2014 and adjusted its service delivery model to prioritize housing resources for the highest need families. The VI-FSPDAT and FSPDAT 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.

Given that the resources provided under ESG are a fraction of that available under HPRP, the system targets resources for households at shelter door, focusing on rapid re-housing and shelter diversion, and coordination with existing homeless provider resources.

Through the HFCA program, a network of service providers in coordination with the lead agency provide rapid re-housing and targeted prevention / diversion services in a coordinated manner, using standard, shared policies for evaluating eligibility.

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

- 1. By walking into the HFCA program for an assessment
- 2. Through targeted outreach and screening with a partnering service provider

At whichever point a household with children contacts the program and preliminary eligibility is determined, an HFCA assessment and VI-FSPDAT is completed to see what type of housing intervention the family scores for. The VI-FSPDAT is a quick assessment that determines the presence of barriers contributing the vulnerability of the family and gives HFCA an idea of which housing track would be most appropriate based on the family's vulnerability.

Households without children can access services through the Singles Homeless Coordinated Assessment (SHCA) System. SHCA began in October of 2014 as a decentralized assessment system with a lead agency to facilitate the training and coordination of assessment sites. SHCA also uses the VI-SDPAT and SPDAT tools to provide common outcome data and measurable results. An individual can access services by walking into the SHCA lead agency or a partnering service provider. Once a VI-SPDAT is completed in HMIS, a housing referral can be made to the appropriate housing track based on the individual's vulnerability and desired housing intervention.

b. Policies and procedures for coordination among providers.

Providers receiving ESG funds coordinate at several levels:

All programs funded to provide Rapid Re-Housing services with ESG funds will coordinate through the Implementation of a Learning Community convened by the lead agency. This learning community will meet at least quarterly to review the program progress and review any modifications to the policies and procedures. Case managers will participate in the learning communities which will be a forum to discuss information on case management and housing stabilization challenges and strategies.

HFCA and SHCA staff coordinate with participating shelters, transitional housing and permanent supportive housing providers, on a daily basis as they determine housing availability and placement of households into the appropriate housing intervention based on the family or individual's assessed vulnerability. HFCA and SHCA staff also have strong coordination and referral relationships to other service providers that offer support services including employment training and placement, food pantry, health care and other services.

All participating homeless providers in Spokane County are connected through the HMIS system, which allows providers to see the service connections clients have, and to follow up on referrals.

Both the monthly HFCA and SHCA learning communities, as well as the Spokane Homeless Coalition meeting, provides opportunities for all homeless service providers to coordinate services.

c. Policies and procedures for which families will receive prevention and which will receive rapid rehousing

Eligible households that are literally homeless at the time of contacting the program and are living in shelter or in a place not meant for human habitation will receive rapid re-housing services. Eligibility for

Rapid Re-housing is based both on the VI-SPDAT score and housing status and services are prioritized by highest VI-SDPAT score, not first come first served.

Families that contact HFCA seeking shelter entry will qualify for prevention assistance if they meet the definition of "at risk of homelessness" and if their prior experience indicates they are most likely to lead to a shelter entry –prior stay in shelter or transitional housing program and/or experienced homelessness in the past 18 months. Prevention assistance is not funded through ESG at this time.

HFCA may provide diversion support to households may to maintain their current housing if that situation is safe and sustainable. Support for these households comes in the form of landlord mediation, case management and connection to resources. SHCA does not currently have funds for diversion services, though staff does provide support to households at risk of losing their housing when they are able.

d. Standards for determining share of rent and utilities each program participant will be provided and how that assistance will be adjusted over time.

The philosophy adopted by programs providing ESG funding is based in providing "the least amount of assistance for the least amount of time" while proving enough support to be reasonably sure that the housing will stick. To accomplish this providers administering rapid re-housing are using a progressive engagement model of financial assistance and services.

Any household moving to new housing will receive up to 100% of deposit and one month's rent based on the households need. Households can pay up to 30% of gross income towards their deposit and rent. Households will be assessed monthly for continuing financial and support need. Households will continue to qualify for assistance, based on an identified need, for up to 90 days. Extensions can be permitted with prior approval when a household is identified with higher barriers. Households that score in the range for PSH using the SPDAT tool can access rapid re-housing while a PSH unit is obtained. Utility assistance will be referred to other programs, such as the LIHEAP program and other local utility assistance programs.

e. Standards for determining how long a program participant is assisted and whether and how the amount of that assistance will be adjusted over time.

The philosophy adopted by programs providing ESG funds is designed on a "progressive engagement" model, intended to provide as little support as needed to divert or re-house households quickly and reserve resources as much as possible for other households, while leaving the door open for increased assistance if needed.

As described above, households will be assessed monthly for continuing financial and support need. Households will continue to qualify for assistance, based on an identified need, for up to 90 days. Extensions can be permitted with prior approval. Monthly assessments allow for household's to receive

services based on their need or to be moved to another housing program if higher need warrant more intensive supports.

f. Standards for the type, amount and duration of stabilization services.

The "progressive engagement" model is intended to provide as little service as needed to divert or rehouse households quickly and reserve resources as much as possible for other households, while leaving the door open for increased assistance if needed. All households will receive an initial assessment and referrals to appropriate community- based services through the HFCA and SHCA programs. Money management/budgeting training will be provided for any household receiving assistance. ESG funded program staff is expected to work with households to obtain benefits, including income and health coverage, or make referrals to agencies that can assist with this. Households in need of housing search assistance will receive help identifying units and making referrals to landlords and assist with applications, as needed.

Through the Learning Community process the type and duration of stabilization services is consistently addressed. Eligible households will receive housing and income-focused support services, focused on ensuring that the household has the support needed to make progress on the housing stabilization plan and that the landlord is satisfied that the household is receiving support for housing related needs. When households are determined over income, rent assistance can be extended for up to an additional 3 months and case management can continue for up to an additional 6 months to support households transition to self-sufficiency.

Coordinated Assessment System (AP90)

In 2012, the CoC developed and funded a Coordinated Assessment Program for homeless and at-risk families. All CoC funded family homeless programs including emergency shelter, transitional housing and permanent supportive housing are required to participate with the Homeless Families Coordinated Assessment (HFCA) program and accept all housing placements through the system. Families can access the HFCA program via phone, walk in, or through targeted outreach by a partnering services provider. All families are screened and assessed with a tool that determines client eligibility and prioritizes client's needs for services. The HFCA program also screens for rapid re-housing, prevention. The assessment identifies and prioritizes families for these interventions.

In 2014 a system specific to single homeless individuals was implemented. The Singles Homeless Coordinated Assessment (SHCA) is a decentralized assessment system where individuals can be assessed for housing at five different locations and through homeless outreach teams throughout Spokane County in. NAP serves as the lead agency, completing a majority of the assessments and overseeing training of SHCA assessors. Individuals are initially assessed using the Vulnerability Index Service Prioritization Decision Assistance Tool (VI-SPDAT) and prioritized for a specific housing intervention based on his or her VI-SPDAT score.

Process for Making Sub-awards and ESG Allocations (AP90)

Locally, the City of Spokane and Spokane County receive and administer ESG funds. As the CoC lead the City of Spokane works, through the Continuum of Care Advisory Committee and Community Housing and Human Services Board (CHHS), to determine priorities for homeless funding. Spokane County staff sits on both the Continuum of Care Advisory Committee and CHHS Board and is an integral part in determining how all homeless funds, including ESG funds, are allocated in the community. During the application process for homeless funding a subcommittee of the CHHS reviews applications and makes funding recommendation. A representative from both ESG jurisdictions participates in this process. 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, low-income housing rehabilitation and microenterprise activities.
- Faith based organizations

Homeless Participation Requirements (AP90)

The City 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 Advisory Committee, and the CHHS Evaluation and RFP Committee. These committees are responsible for recommending policies and funding decisions.

Performance Standards for Evaluating ESG (AP90)

All programs funded through ESG are evaluated for performance quarterly. Data for these evaluations is pulled from the Homeless Management Information System. In addition, all ESG funded programs are required to ensure HMIS data quality by the 5th of each month.

Programs funded for rapid re-housing are measured by the number of households exiting to permanent housing, the average term of homelessness, the number of households with increased income at exit, and the number of households connected with mainstream services at exit.

Programs funded for emergency shelter operations are required to enter universal data into the HMIS system and record entry and exit dates. In addition, these programs are measured by the number of households who exit from the emergency shelter into permanent housing, the average length of stay in the program, the number of households exiting with increased income and connection to mainstream resources.

Discussion:

The City adopted Grant Management and Financial Assistance Policies and Procedures that became effective 4/1/14. These procedures were developed to address federal, State and City statutory and

regulatory requirements, in addition to providing City staff with a system of ensuring project compliance and accomplishment.

The City will report annually on the progress it has made in carrying out the strategic plan and action plan. This performance report will comply with HUD's requirements and format and will be submitted by the date specified by HUD.

The City has four monitoring tools to ensure compliance with statutory and regulatory requirements. These are (a) policies and procedures, (b) contract requirements, (c) desk-top monitoring, and (d) on-site monitoring. The City's Community, Housing and Human Services Board establishes policies that guide the application and allocation process for entitlement funded programs and activities.

All applications are evaluated to determine if they are (1) program eligible (2) consistent with local, state and federal regulations and (3) viable as submitted.

Projects funded through CDBG, HOME or ESG will be managed directly, through another City Department, by a vendor selected by an RFP process (e.g. Single Family Housing Rehabilitation Program) or by a subrecipient under contract with the City. In addition to the scope of work, duration and projected accomplishments, each contract contains federal, state and local program requirements, deliverables and/or performance measurements.

Construction projects that require compliance with federal labor standards have an additional layer of review that frequently includes a pre-construction conference with the Contract Compliance Officer, project manager, subrecipient and the project's architect or general contractor. Additional requirements may include MWBE and Section 3 outreach.

Site visits are typically scheduled with new subrecipients prior to contracting to provide technical assistance and to review the organization's financial and administrative systems. During the 2015 program year, the City may conduct workshops for subrecipients on administrative systems as well as application assistance.

During the program year, the City schedules monitoring visits with subrecipients in accordance with an approved monitoring plan and risk assessment.

The City has standardized procedures to ensure that all fiscal information is correct and complete before it is submitted to HUD for reimbursement with CDBG, HOME and ESG funds. Once the City's letter of credit is approved and the funds become available, separate project account numbers are established in the City's Financial Management System.

HUD-approved projects are linked to accounts via the City's Financial Management System. A continuing balance for each project is maintained electronically and can be accessed on a daily basis. Departmental records are balanced to the City's records monthly. Also, City records are balanced to HUD's cash and management information system (IDIS).

When subrecipients request reimbursement, they are required to submit a voucher reimbursement request with backup documentation. Project managers and accounting staff review both. Reimbursement requests are reviewed for eligibility and appropriateness under contracted provisions. If an inappropriate or ineligible cost is incurred, or if performance falls below projections, the City will not reimburse the subrecipient and will work towards rectifying the deficiency.

APPENDIX A: SPOKANE CHAS TABLES

The IDIS CHAS tables are included in the appendix, along with analysis leading to conclusions about housing condition and need, particularly disproportionate needs in Spokane. Conclusions about need have been brought into appropriate sections in the body of the Consolidated Plan.

Table A-1a: Number of Households (CHAS Table 6 - NA 10)

Household Type	0-30% HAMFI	>30-50% HAMFI	>50-80% HAMFI	>80-100% HAMFI	>100% HAMFI
Total Households	13,640	11,710	17,045	9,745	35,735
Small family households	3,690	3,420	6,045	4,200	17,855
Large family households	590	770	1,010	580	2,405
Household contains at least one person 62-					
74 years of age	1,640	1,785	2,390	1,590	6,350
Household contains at least one person age					
75 or older	1,720	2,020	2,495	1,005	2,865
Households with one or more children 6					
years old or younger	2,130	2,085	2,750	1,660	3,820

Source: 2007-2011 CHAS

2007-2011 ACS estimated a total of 87,875 households (total column not shown above). Combined, 41% of households in Spokane had incomes below HUD Adjusted Area Median Family Income (HAMFI).

- 29% of households had incomes at or below 50% of HAMFI
- 16% of households had incomes at or below 30% of HAMFI

Table A-1b: Household Type as Percent of Total Households by Income Range

Household Type	0-30% HAMFI	>30-50% HAMFI	>50-80% HAMFI	>80-100% HAMFI	>100% HAMFI	Total
Total Households	13,640	11,710	17,045	9,745	35,735	87,875
Small Family Households	27%	29%	35%	43%	50%	40%
Large Family Households	4%	7%	6%	6%	7%	6%
Household contains at least one person 62-74 years of age	12%	15%	14%	16%	18%	16%
Household contains at least one person age 75 or older	13%	17%	15%	10%	8%	11%
Households with one or more children 6 years old or younger	16%	18%	16%	17%	11%	14%

Source: 2007-2011 CHAS Table 6 (IDIS NA-10)

For most household types there is little variation in percent of the total households within the income range (Table A-1b) when compared to total households. However, there is some variation in the percent of small family households. Half (50%) of households with incomes at or above HAMFI are small family households. The share of small family households decreased with household income.

Housing Needs Summary Tables for Several Types of Housing Problems (NA 10)

Table A-2 shows housing problems in order of severity, beginning with lack of complete kitchen or plumbing facilities. Households in the first row were excluded from subsequent rows meaning households may have had multiple problems – just the most severe is reflected in Table A-2.

Table A-2: Households with one of Listed Needs (1) (CHAS Table 7 – NA 10)

			Renter					Owner		
Housing Problem	0-30% AMI	>30- 50% AMI	>50- 80% AMI	>80- 100% AMI	Total	0-30% AMI	>30- 50% AMI	>50- 80% AMI	>80- 100% AMI	Total
Substandard Housing: Lack										
complete plumbing or										
kitchen facilities	360	160	230	30	780	30	30	40	0	100
Severely Overcrowded:										
>1.51 people p/room (with										
complete kitchen/plumbing)	125	155	80	0	360	25	0	0	0	25
Overcrowded: 1.01-1.5										
people p/room (and none of										
the above problems)	165	75	250	75	565	0	65	180	10	255
Housing cost burden >50% of										
income (and none of the										
above problems)	6,870	1,640	345	40	8,895	1,995	1,375	1,300	205	4,875
Housing cost burden >30% of										
income (and none of the										
above problems)	1,550	3,960	2,770	380	8,660	445	1,305	2,835	1,850	6,435
Zero/negative Income (and										
none of the above problems)	305	0	0	0	305	350	0	0	0	350

Data Source: 2007-2011 CHAS

In order of severity of need or condition:

- 780 renter households and 100 owners were living in substandard housing, defined as lacking complete plumbing or kitchen facilities.
- Another 360 renters and 25 owners were living in severely overcrowded conditions, defined as more than 1.5 persons per room.
- The most prevalent housing need (or condition) for both renters and owner households was cost in relation to income. The 2007-2011 CHAS estimates showed that at least 8,895 renter households and 4,875 owner households were paying more than 50% of income for housing costs. At least an additional 8,660 renter households and 6,435 owner households were paying between 30% and 50% of income for housing.
- Housing needs fell disproportionately to the poorest households, particularly renter households.

Table A-3 shows housing conditions by tenure for all Spokane households (at all levels of income). Nearly half (49%) of all renter households in Spokane had at least one housing problem, according to the CHAS data, as did 28% of all owner households. Note that selected conditions include cost-burden and overcrowding, so "condition" is not primarily a matter of housing quality. As shown in Table A-2 housing problems were more frequently a matter of housing costs in relation to income.

Table A-3: Conditions (CHAS Table 37 - MA 20)

Condition of Units*	Owner-O	cupied	Renter-Occupied		
Condition of Onits	Number	%	Number	%	
With one selected condition	14,181	28%	18,573	49%	
With two selected conditions	215	<1%	1,141	3%	
With three selected conditions	16	<1%	106	<1%	
With four selected conditions	0	0%	0	0%	
No selected conditions	35,798	71%	17,839	47%	
Total	50,210	100%	37,659	100%	

^{*}Note that "condition" includes housing problems, the majority of which are

cost-burden and to a lesser extent over-crowding.

Source: 2007-2011 CHAS

Table A-4 (CHAS Table 8) summarizes severe housing problems – that is, lack of complete plumbing and/or kitchen facilities, severe cost burden (paying more than 50% of income for housing) and severe overcrowding (more than 1.5 persons per room). As was demonstrated in previous tables, by far the most prevalent severe problem was housing cost in relation to income – households paying over 50% of income for housing costs.

Table A-4: Households with One or more Severe Housing Problems*(2) (CHAS Table 8 - NA 10)

			Renter			Owner				
Housing Problem	0-30% AMI	>30- 50% AMI	>50- 80% AMI	>80- 100% AMI	Total	0-30% AMI	>30- 50% AMI	>50- 80% AMI	>80- 100% AMI	Total
Having 1 or more of four										
housing problems	7,520	2,030	905	145	10,600	2,050	1,470	1,520	215	5,255
Having none of four										
housing problems	2,690	5,500	7,785	3,450	19,425	725	2,710	6,835	5,935	16,205
Household has negative										
income, but none of the										
other housing problems	305	0	0	0	305	350	0	0	0	350

*Lacks kitchen or complete plumbing, severe overcrowding, severe cost burden

Data Source: 2007-2011 CHAS

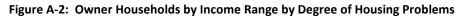
The following figures combine data from Tables A-3 and A-4 (CHAS tables 7 and 8) and show problems (problems and severe problems) for renters and owners by income range to 100% of AMI. Each column is the total of the estimated number of renters or owners in each income range for Spokane.

According to CHAS data, there were 30,330 renters and 21,810 owner households with incomes below AMI in Spokane. It is clear from the figures that:

- There were many more renter households than owners with incomes at or below 30% of AMI and with incomes between 30% and 50% of AMI.
- The majority of both renter and owner households with incomes at or below 30% of AMI had one or more severe housing problems 72% of renters and 66% of owners. By far the greatest need or condition was cost in relation to income.
- The majority of both renter and owner households with incomes between 30% and 50% of AMI had housing problems, although fewer severe problems 27% of renters and 35% of owners

with incomes between 30% and 50% of AMI had severe housing problems. Again, the most prevalent contributing factor was cost in relation to income.

Figure A-1: Renter Households by Income Range by Degree of Housing Problems



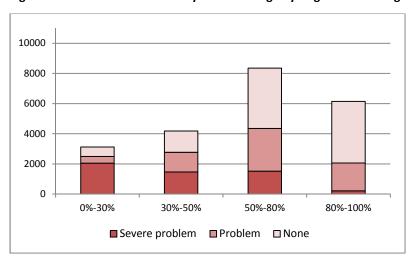


Table A-5: Cost Burden >30% (3) (CHAS Table 9 - NA 10)

Household		Rente	er	Owner				
Type	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
Small related	2,715	2,015	1,250	5,980	690	900	2,035	3,625
Large related	440	440	205	1,085	100	180	330	610
Elderly	1,440	1,035	665	3,140	1,075	1,025	800	2,900
Other	4,340	2,410	1,200	7,950	630	650	1,025	2,305
Total need	8,935	5,900	3,320	18,155	2,495	2,755	4,190	9,440

Data Source: 2007-2011 CHAS

Table A-6: Cost Burden >50% (4) (CHAS Table 10 - NA 10)

Hamabald		Rente	r	Owner				
Household Type	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
Small related	2,250	540	80	2,870	645	400	520	1,565
Large related	370	140	35	545	75	65	135	275
Elderly	835	415	230	1,480	740	510	265	1,515
Other	3,745	670	80	4,495	565	410	395	1,370
Total need	7,200	1,765	425	9,390	2,025	1,385	1,315	4,725

Data Source: 2007-2011 CHAS

CHAS tables 9 and 10 reflect cost-burdens for low-mod households (incomes below 80% of AMI).

- Overall, 18,155 renters and 9,440 owners in the low-mod income range (below 80% of AMI) were burdened by costs in excess of 30% of household income and about half of them (9,390 renters and 4,725 owners) were burdened by costs in excess of half (50%) of household income.
- Other than observation of numbers of households with burdens, it is difficult to draw
 conclusions by type of households because of lack of CHAS totals by household type and tenure
 to use as a reference.
- There were twice as many low-mod cost-burdened renter households than owner-households, at both the 30% cost-burden level and 50% (severe burden). This is consistent with the greater number of lower-income renter households in Spokane.
- About an equal number of elderly low-mod renter and owner households were burdened by costs 3,140 renters and 2,900 owners had costs greater than 30% of income; 1,480 renter households and 1,515 owner households had costs greater than 50% of income.

Table A-7: Crowding* (5) (CHAS Table 11 – NA 10)

			Renter		Owner					
Household Type	0-30% AMI	>30- 50% AMI	>50- 80% AMI	>80- 100% AMI	Total	0-30% AMI	>30- 50% AMI	>50- 80% AMI	>80- 100% AMI	Total
Single family										
households	210	70	295	25	600	25	45	135	10	215
Multiple, unrelated										
family households	65	150	15	50	280	0	35	45	4	84
Other, non-family										
households	15	15	45	0	75	0	0	0	0	0
Total need	290	235	355	75	955	25	80	180	14	299

*More than one person per room Data Source: 2007-2011 CHAS

A total of 1,254 lower-income (to 100% of AMI) households were living in overcrowded conditions, both renters and owners – the largest portion was single family households, rather than multiple family or non-related households.

Disproportionately Greater Need: Housing Problems (NA-15)

Table A-9: Disproportionately Greater Need 0%-30% of AMI (CHAS Table 13 - NA 15)

Race/Ethnicity	One or more of four housing problems*	None of four housing problems	No/negative income, but none of housing problems
Jurisdiction as a whole	10,950	1,460	670
White	9,240	1,160	570
Black / African American	300	35	15
Asian	235	75	45
American Indian, Alaska Native	280	50	15
Pacific Islander	0	25	0
Hispanic	485	40	0

^{*}The four housing problems are: 1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than one person per room, 4.Cost Burden greater than 30%

Data Source: 2007-2011 CHAS

Disproportionate needs are defined as a need greater than 10% of that found for the jurisdiction as a whole. For the jurisdiction as a whole, 84% of households with incomes between 0% and 30% of AMI experienced housing needs. There were no racial or ethnic households with disproportionate needs in this income range.

Table A-10: Disproportionately Greater Need 30%-50% of AMI (CHAS Table 14 – NA 15)

Race/Ethnicity	One or more of four housing problems*	None of four housing problems	No/negative income, but none of housing problems	
Jurisdiction as a whole	8,005	3,390	0	
White	6,805	3,070	0	
Black / African American	370	50	0	
Asian	25	85	0	
American Indian, Alaska Native	125	40	0	
Pacific Islander	100	4	0	
Hispanic	315	70	0	

^{*}The four housing problems are: 1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than one person per room, 4.Cost Burden greater than 30%

Data Source: 2007-2011 CHAS

For the jurisdiction as a whole, 70% of households with incomes between 30% and 50% of AMI experienced housing needs. While the numbers of households was very small and the margin of error so great as to bring question to this finding, a disproportionate share of the following households in this income range experience one or more needs:

- 88% of Black/African American-headed households
- 96% of Pacific Islander-headed households
- 81% of Hispanic-headed households

Looking at Table A-11, for the jurisdiction as a whole, 44% of households with incomes between 50% and 80% of AMI experienced housing needs. While the numbers of households was very small and the

margin of error so great as to bring question to this finding, a disproportionate share of the following households in this income range experience one or more needs:

- 74% of Black/African American-headed households
- 60% of Asian-headed households
- 69% of American Indian/Alaska Native-headed households
- 71% of Pacific Islander-headed households

Table A-11: Disproportionately Greater Need 50%-80% of AMI (CHAS Table 15 - NA 15)

Race/Ethnicity	One or more of four housing problems*	None of four housing problems	No/negative income, but none of housing problems	
Jurisdiction as a whole	7,540	9,620	0	
White	6,525	8,785	0	
Black / African American	255	90	0	
Asian	220	145	0	
American Indian, Alaska Native	185	85	0	
Pacific Islander	25	10	0	
Hispanic	150	365	0	

^{*}The four housing problems are: 1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than one person per room, 4.Cost Burden greater than 30%

Data Source: 2007-2011 CHAS

Table A-12: Disproportionately Greater Need 80%-100% AMI (CHAS Table 16 - NA 15)

Race/Ethnicity	One or more of four housing problems*	None of four housing problems	No/negative income, but none of housing problems	
Jurisdiction as a whole	2,590	7,690	0	
White	2,340	6,885	0	
Black / African American	40	125	0	
Asian	79	80	0	
American Indian, Alaska Native	15	85	0	
Pacific Islander	4	0	0	
Hispanic	85	245	0	

^{*}The four housing problems are: 1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than one person per room, 4.Cost Burden greater than 30%

Data Source: 2007-2011 CHAS

For the jurisdiction as a whole, 25% of households with incomes between 80% and 100% of AMI (see Table A-12) experienced housing needs. While the numbers of households was very small and the margin of error so great as to bring question to this finding, a disproportionate share of the following households in this income range experience one or more needs:

• 50% of Asian-headed households

Disproportionately Greater Need: Severe Housing Problems (NA-20)

For the jurisdiction as a whole, 69% of households with incomes between 0% and 30% of AMI (see Table A-13) experienced severe housing needs. While the numbers of households was very small and the

margin of error so great as to bring question to this finding, a disproportionate share of the following households in this income range experience one or more needs:

- 83% of Black/African American-headed households
- 84% of Hispanic-headed households

Table A-13: Severe Housing Problems 0%-30% AMI (CHAS Table 17 – NA 20)

Race/Ethnicity	One or more of four housing problems*	None of four housing problems	No/negative income, but none of housing problems	
Jurisdiction as a whole	9,010	3,400	670	
White	7,475	2,930	570	
Black / African American	290	45	15	
Asian	180	130	45	
American Indian, Alaska Native	240	90	15	
Pacific Islander	0	25	0	
Hispanic	440	85	0	

^{*}The four severe housing problems are: 1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than 1.5 persons per room, 4.Cost Burden greater than 50%

Data Source: 2007-2011 CHAS

Table A-14: Severe Housing Problems 30%-50% AMI (CHAS Table 18 - NA 20)

Race/Ethnicity	One or more of four housing problems*	None of four housing problems	No/negative income, but none of housing problems	
Jurisdiction as a whole	3,420	7,975	0	
White	2,890	6,980	0	
Black / African American	105	315	0	
Asian	4	105	0	
American Indian, Alaska Native	50	110	0	
Pacific Islander	95	4	0	
Hispanic	190	200	0	

^{*}The four severe housing problems are: 1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than 1.5 persons per room, 4.Cost Burden greater than 50%

Data Source: 2007-2011 CHAS

For the jurisdiction as a whole, 30% of households with incomes between 30% and 50% of AMI experienced severe housing needs. While the numbers of households was very small and the margin of error so great as to bring question to this finding, a disproportionate share of the following households in this income range experience one or more needs:

- 96% of Pacific Islander-headed households
- 49% of Hispanic-headed households

For the jurisdiction as a whole, 12% of households with incomes between 50% and 80% of AMI experienced severe housing needs. While the numbers of households was very small and the margin of error so great as to bring question to this finding, a disproportionate share of the following households in this income range experience one or more needs:

44% of Asian-headed households

Table A-15: Severe Housing Problems 50%-80% AMI (CHAS Table 19 - NA 20)

Race/Ethnicity	One or more of four housing problems*	None of four housing problems	No/negative income, but none of housing problems	
Jurisdiction as a whole	2,020	15,145	0	
White	1,710	13,610	0	
Black / African American	50	295	0	
Asian	160	205	0	
American Indian, Alaska Native	40	225	0	
Pacific Islander	4	25	0	
Hispanic	55	450	0	

^{*}The four severe housing problems are: 1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than 1.5 persons per room, 4.Cost Burden greater than 50%

Data Source: 2007-2011 CHAS

Table A-16: Severe Housing Problems 80%-100% AMI (CHAS Table 20 – NA 20)

Race/Ethnicity	One or more of four housing problems*	None of four housing problems	No/negative income, but none of housing problems	
Jurisdiction as a whole	445	9,835	0	
White	390	8,840	0	
Black / African American	0	165	0	
Asian	30	130	0	
American Indian, Alaska Native	0	100	0	
Pacific Islander	4	0	0	
Hispanic	20	310	0	

^{*}The four severe housing problems are: 1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than 1.5 persons per room, 4.Cost Burden greater than 50%

Data Source: 2007-2011 CHAS

For the jurisdiction as a whole, 4% of households with incomes between 80% and 100% of AMI experienced severe housing needs. There were no racial or ethnic households with disproportionate needs in this income range.

Disproportionately Greater Need: Housing Cost Burdens

Table A-17: Housing Cost Burdens (CHAS Table 21 - NA 25)

<=30%	30%-50%	>50%	No / negative income (not computed)
53,670	17,245	13,660	775
49,120	15,160	11,480	665
660	550	420	15
905	205	325	45
425	315	280	15
65	65	54	0
1,615	460	670	10
	53,670 49,120 660 905 425 65	53,670 17,245 49,120 15,160 660 550 905 205 425 315 65 65	53,670 17,245 13,660 49,120 15,160 11,480 660 550 420 905 205 325 425 315 280 65 65 54

Data Source: 2007-2011 CHAS

Table A-17 (CHAS table 21) summarizes cost burden by race and ethnicity of the householder. For the jurisdiction as a whole, 37% of households experienced cost burdens. As noted previously the minority householders (by race or ethnicity) is too small to draw valid conclusions given the large margins or

error. However, compared to the jurisdiction as a whole, a disproportionate percentage of the following households experienced cost burdens:

- 60% of Black/African American-headed households experienced cost burden
- 58% of American Indian/Alaska Native-headed households experienced cost burden
- 65% of Pacific Islander-headed households experienced cost burdens

APPENDIX B: SPOKANE LOW/MOD AND MINORITY BLOCK GROUPS*

Tract	Block Group	Percent Low-Mod	Population 2010	Percent Minority	Tract	Block Group	Percent Low-Mod	Population 2010	Percent Minority
200	1	62%	792		2500	4	90%	3,266	
200	2	75%	725		2500	5	93%	1,099	
200	3	75%	761		2500	6	61%	1,131	
200	4	69%	911		2600	1	58%	1,342	
200	5	57%	1,465		2600	2	70%	1,280	
300	2	60%	1,349		2600	3	86%	1,103	31%
300	3	69%	1,539		2600	4	70%	1,511	
300	4	55%	1,164		2900	1	53%	1,017	
400	1	63%	1,425		3000	1	81%	1,265	28%
400	2	65%	1,442		3000	2	67%	1,494	32%
400	3	70%	1,243		3100	1	92%	1,364	37%
600	1	59%	934		3100	2	52%	1,142	
700	1	60%	1,196		3100	3	59%	1,011	
900	1	70%	724		3200	1	80%	668	
1100	3	58%	1,001		3200	2	86%	742	
1200	1	69%	806		3200	4	69%	527	
1300	2	54%	1,424		3500	1	76%	1,255	
1300	3	60%	978		3500	2	91%	1,349	
1400	1	77%	1,569		3600	1	68%	1,512	
1400	2	59%	1,623		3600	2	70%	713	
1400	3	66%	1,337		3600	3	58%	1,055	
1400	4	65%	1,715		4000	1	53%	1,105	
1500	1	56%	1,324		4000	2	53%	938	
1500	5	75%	1,461		4000	4	64%	1,150	
1600	1	80%	1,392		4000	5	94%	1,081	
1600	2	83%	1,024	28%	4601	3	62%	1,310	
1600	3	76%	1,322		4700	1	54%	1,590	
1800	1	69%	1,364		4700	4	52%	2,037	
1800	2	66%	1,398		10800	1	62%	7	
1900	2	64%	1,526		11000	2	52%	13	77%
2000	2	60%	736		11101	1	80%	1,443	
2000	3	86%	888		11101	2	72%	1,316	
2000	4	77%	894	31%	11101	4	72%	1,361	
2000	5	70%	888		11102	2	78%	1,470	
2100	2	51%	1,551		11201	3	61%	2,128	
2300	1	75%	1,074		11201	4	75%	1,373	
2300	2	74%	1,141		11300	2	71%	0	
2300	3	80%	1,543		12200	1	64%	518	
2300	4	69%	1,315		14400	1	90%	768	
2400	1	80%	1,474	28%	14500	1	98%	590	29%
2400	2	83%	1,010		14500	2	72%	968	
2500	2	58%	1,527		14500	3	64%	546	
2500	3	94%	841						

^{*}Low-mod block groups are those in which 51% of more of the population live in households with incomes at or below 80% of Area Median Income (AMI). Disproportionate minority population defined as 10% greater than for the jurisdiction as a whole. Disproportionate in Spokane is 27% or more minority population (Hispanic and/or a race other than white alone). Sources: Low-mod, HUD 2014 tabulation of 2006-2010 ACS; minority, 2010 US Census