



**COMPREHENSIVE ANNUAL  
PERFORMANCE AND EVALUATION  
REPORT (CAPER) FOR FY 2015**

DISPLAY PERIOD:

October 28, 2016 to November 14, 2016

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## Executive Summary

The City of Trenton CDBG Program and HOME Investments Partnership Program offered comprehensive assistance to extremely-low, very-low and low-income persons and families with a variety of housing opportunities, social services, recreational opportunities and financial assistance. In addition, the City's Emergency Solutions Grant was utilized to assist the homeless or those in jeopardy of homelessness.

The 2015 U.S. Department of Housing and Urban Development (HUD) federal allocations for the City of Trenton were as follows:

- Community Development Block Grant (CDBG) \$2,371,985
- HOME Investments Partnerships Program \$536,858
- Emergency Solutions Grant (HESG) Program \$219,357

The enclosed IDIS Performance Report (PR 26), Financial Summary Report profiles CDBG, HOME and HESG activities for Program Year 2015. The report provides information on allocations and disbursements of 2015 funds.

## CR-05 - Goals and Outcomes

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

For FY 2015, the City of Trenton identified the following goals and outcomes to carry out its strategic plan and action plan::

- Create and preserve affordable homeownership housing;
- Reduce hazards created by lead-based paint in the City's housing stock;
- Support activities that prevent homelessness;
- Support the ongoing operation and preservation of shelter facilities for homeless;
- Support activities that move persons experiencing homelessness to permanent housing;
- Improve and expand public facilities to serve low income populations;
- Improve and expand infrastructure to serve low income populations; and
- Support public services for children, homeless and special needs populations.

The City has been working extensively to enhance and build staffing capacity to achieve these goals and outcomes.

In-house staff is essential in reporting on-going progress of all community development initiatives to managerial and selected consultants for the completion of said planning and reporting requirements as mandated by HUD. The Director of the Department of Housing and Economic Development, together with key staff in the Division of Housing Production, worked to comply with program and comprehensive planning requirements. During the program year 2 individuals were hired to assist with the CDBG program. A long vacant project coordinator position was filled in January 2015 to work full time on facilitating public service awards. In addition, the City hired a consulting firm to work closely with the City to develop an updated HOME Policies and Procedures manual, provide guidance on updating HUD's project databased (IDIS) with accomplishment data and completion strategies; provided extensive staff training on record keeping and invoicing, in addition to overall grant management.

Enhanced staffing has allowed for better project management and greater system-wide efficiencies. One staff member was promoted to the Chief of the Division of Housing Production. In this role, the staff member reports to the Department Director and continues to dedicate more than half of his time to management of HUD entitlement grants. In January 2015, an individual was hired to fill the vacant Project Coordinator. By filling the Chief of Housing Production position and having a full time Project Coordinator, the City reestablished a staffing structure and resource level that had been neglected for several years.

In the latter half of the 2015 Program Year, the City was not permitted by HUD to draw down funds until it met several Special

Conditions outlined in it's award letter. Therefore, several activities show beneficiaries and were completed (especially public services), yet funds have not been disbursed from the program.

**Comparison of the proposed versus actual outcomes for each outcome measure submitted with the consolidated plan and explain, if applicable, why progress was not made toward meeting goals and objectives. 91.520(g)**

The table below illustrates the City's accomplishments for FY 2015.

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

Goal	Category	Source / Amount	Indicator	Unit of Measure	Expected – Strategic Plan	Actual – Strategic Plan	Percent Complete	Expected – Program Year	Actual – Program Year	Percent Complete
Acquisition	Acquisition	CDBG: \$0/ HOME: \$1,867.15 / ESG: \$0	Rental units rehabilitated	Household Housing Unit	25	8	32.00%	25	8	0.00%
Improve health care	Health Care (IDIS 467,1490, 1706)	CDBG: \$79,182	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	20000	28	0.14%	4000	28	0.70%
Improve public facilities	Non-Housing Community Development (IDIS 1547 and 1575)	CDBG: \$71,030.71	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	Persons Assisted	4837	28,184	582.68%	4837	28,184	582.68%
Improve public infrastructure	Non-Housing Community Development (parks: IDIS 1544 and 1545)	CDBG: \$34,500.86	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	Persons Assisted	5000	02	0.00%	5000	0	0.00%

Increase the number of affordable units	Affordable Housing	CDBG: \$ 143,444.48/ HOME: \$	Homeowner Housing Rehabilitated	Household Housing Unit	165	11	6.66%	29	11	37.93%
Planning and administration	Planning and administration	CDBG: \$ 451,630.10/ HOME: \$ / ESG: \$	Other	Other	5	1	20.00%	3	1	33.00%
Provide homeless housing and services	Homeless	CDBG: \$ / ESG: \$120,000	Tenant-based rental assistance / Rapid Rehousing	Households Assisted	50	0	0.00%	10	0	0.00%
Provide homeless housing and services	Homeless	CDBG: \$ / ESG: \$ 6,707	Homelessness Prevention	Persons Assisted	500	0	0.00%	10	0	0.00%
Provide public services	Non-Housing Community Development	CDBG: \$506,213.69	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	1000	376,493	668.00%	11,047	376,493	3408.10%
Provide public services	Non-Housing Community Development  (note: Lead testing)	CDBG: \$0	Homeowner Housing Rehabilitated	Household Housing Unit	11	0	0	11	0	0
Slum and blight removal	Non-Housing Community Development  (IDIS 1703)	CDBG: \$191,010	Buildings Demolished	Buildings	40	0	0.00%	0	0	0.00%

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

CDBG funds as well as HOME, and ESG funds address high priority needs by supporting programs and activities that address the goals of the Five Year Plan, especially meeting affordable housing needs, ending homelessness and improving the quality of life for City's low- and moderate-income residents through improved services and facilities.

The housing rehabilitation program assisted 11 homeowners with improvements to bring homes up to code.

There were two HOME projects undertaken in the program year – completion of an 8 unit rental and initiation of a 7 unit homebuyer project by Habitat for Humanity.

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

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

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

	<b>CDBG</b>	<b>HOME</b>	<b>ESG</b>
White	7,371	0	0
Black or African American	36,916	8	0
Asian	2,017	0	0
American Indian or American Native	170	0	0
Native Hawaiian or Other Pacific Islander	61	0	0
<b>Total</b>	<b>46,535</b>	<b>8</b>	<b>0</b>
Hispanic	1,126	1	0
Not Hispanic	10,517	7	0



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

### Identify the resources made available

**Table 3 – Resources Made Available**

Source of Funds	Source	Resources Made Available	Amount Expended During Program Year
CDBG		12,616,557	377,968
HOME		2,147,432	101,867
ESG		877,428	126,707

### Narrative

The City of Trenton has received the following grant amounts during the time period of July 1, 2015 through June 30, 2016:

- Community Development Block Grant (CDBG) \$2,371,985
- HOME Investments Partnerships Program \$536,858
- Emergency Solutions Grant (HESG) Program \$219,357

**Total Funds Received - \$3,128,200**

### Identify the geographic distribution and location of investments

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

Target Area	Planned Percentage of Allocation	Actual Percentage of Allocation	Narrative Description
CITY OF TRENTON RESIDENTS	100		

### Narrative

The City did not target funding to specific neighborhoods. The City as a whole is the target area for funding. Activities were planned and carried out in lower income areas of the City.

## Leveraging

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

**Table 5 – Fiscal Year Summary - HOME Match Report**

Fiscal Year Summary – HOME Match	
1. Excess match from prior Federal fiscal year	
2. Match contributed during current Federal fiscal year	
3. Total match available for current Federal fiscal year (Line 1 plus Line 2)	
4. Match liability for current Federal fiscal year	0
5. Excess match carried over to next Federal fiscal year (Line 3 minus Line 4)	

**Table 6 – Match Contribution for the Federal Fiscal Year**

Match Contribution for the Federal Fiscal Year								
Project No. or Other ID	Date of Contribution	Cash (non-Federal sources)	Foregone Taxes, Fees, Charges	Appraised Land/Real Property	Required Infrastructure	Site Preparation, Construction Materials, Donated labor	Bond Financing	Total Match

## HOME MBE/WBE report

**Table 7 – Program Income**

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

**Table 8 – Minority Business and Women Business Enterprises**

<b>Minority Business Enterprises and Women Business Enterprises – Indicate the number and dollar value of contracts for HOME projects completed during the reporting period</b>						
	Total	Minority Business Enterprises				White Non-Hispanic
		Alaskan Native or American Indian	Asian or Pacific Islander	Black Non-Hispanic	Hispanic	
<b>Contracts</b>						
Number	1			1		
Dollar Amount						
<b>Sub-Contracts</b>						
Number						
Dollar Amount						
	Total	Women Business Enterprises	Male			
<b>Contracts</b>						
Number						
Dollar Amount						
<b>Sub-Contracts</b>						
Number						
Dollar Amount						

**Table 9 – Minority Owners of Rental Property**

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

**Table 10 – Relocation and Real Property Acquisition**

<b>Relocation and Real Property Acquisition – Indicate the number of persons displaced, the cost of relocation payments, the number of parcels acquired, and the cost of acquisition</b>						
Parcels Acquired		0				
Businesses Displaced		0				
Nonprofit Organizations Displaced		0				
Households Temporarily Relocated, not Displaced		0				
Households Displaced	Total	Minority Property Enterprises				White Non-Hispanic
		Alaskan Native or American Indian	Asian or Pacific Islander	Black Non-Hispanic	Hispanic	
Number	0					
Cost	0					

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

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

**Table 11 – Number of Households**

	One-Year Goal	Actual
Number of homeless households to be provided affordable housing units		0
Number of non-homeless households to be provided affordable housing units		0
Number of special-needs households to be provided affordable housing units		8
<b>Total</b>		<b>8</b>

**Table 12 – Number of Households Supported**

	One-Year Goal	Actual
Number of households supported through rental assistance	10	0
Number of households supported through the production of new units	0	0
Number of households supported through the rehab of existing units	29	11
Number of households supported through the acquisition of existing units	0	0
<b>Total</b>	<b>39</b>	<b>11</b>

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

The City anticipated serving 29 households with rehab but 11 homes were completed. Commitment of HOME funds was also slow. There is one Habitat project underway to create 7 housing units for low income homebuyers.

The Tenant-Based Rental Assistance (TBRA) program is currently inactive.

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

The City has been working closely with HUD to address deficiencies in the past years. This has greatly impacted the capacity to move forward with new programs and services. Future Action Plans will be impacted by a lack of resources due to the recapture of funds from prior years.

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

**Table 13 – Number of Persons Served**

Number of Persons Served	CDBG Actual	HOME Actual
Extremely Low-income	7	8
Low-income	4	0
Moderate-income	0	0
<b>Total</b>	<b>11</b>	<b>8</b>

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

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

The Mercer Alliance to End Homelessness with its system partners, the City of Trenton, the Mercer County Department of Human Services and the Mercer County Board of Social Services have been pursuing a system change planning and implementation process centered around Mercer County's Ten Year Plan to End Homelessness. The City of Trenton, Department of Health and Human Services is the lead agency for planning and grant applications under the Trenton/Mercer Continuum of Care process. The Continuum is made up of over 40 social service providers; both governmental and non-profit organizations.

The Trenton/Mercer CoC coordinates a broad array of services that includes, but is not limited to:

- Outreach Assessments
- Prevention of Homelessness
- Emergency Shelter/Services
- Rapid Rehousing
- Transitional Housing
- Case management/Support Services
- Permanent Housing
- Education Resources

Progress towards meeting its goal for reducing and ending homelessness can be seen through the opening of the Coordinated Entry & Assessment Services (CEAS) Center in 2015 in a beautiful former family transitional housing building located in the heart of the city of Trenton. The goal of the CEAS Center is to move chronically homeless individuals toward permanent housing and supportive services. The Center helps the chronically homeless navigate housing options and support services at one location. In addition, a mobile outreach initiative was launched to span all four wards of the city to outreach to those "service resistant" individuals and those reluctant or unable to enter emergency shelter. The mobile outreach van is also used to transport the homeless to various appointments. This new initiative added another dimension to the homeless delivery system in Trenton/Mercer by creating a significant system change that focuses on the national Housing First approach to house homeless individuals as quickly as possible.

**Reaching out to homeless persons (especially unsheltered persons) and assessing their individual needs**  
**Addressing the emergency shelter and transitional housing needs of homeless persons**

Under the CoC Program, the Trenton/Mercer Continuum of Care is responsible for conducting a Point-in-Time count of the homeless persons, at least biennially; however, the CoC has elected to conduct the count annually. The Point-in-Time Count provides a one day snapshot of homeless households in our communities. The Count conducts a sheltered and unsheltered report of all homeless individuals and families according to the US Department of Housing and Urban Development (HUD) definitions.

The Trenton/Mercer CoC adopted the Opening Doors Federal Strategic Plan to Prevent and End Homelessness. The goals of the plan are to:

- Finish the job of ending chronic homelessness in 2017
- Prevent and end homelessness among Veterans in 2015
- Prevent and end homelessness for families, youth, and children in 2020
- Set a path to ending all types of homelessness

In April 2015, the Coordinated Entry & Assessment Services (CEAS) Center was opened to help the chronically homeless navigate housing options and support services at one location. In addition, a mobile outreach initiative was launched to span all four wards of the city to outreach to those “hard to reach” individuals and those reluctant or unable to enter emergency shelter.

In November 2015, Mayor Eric Jackson and Mercer County Executive Brian Hughes signed on to the White House Challenge to End Veteran's Homelessness in the Trenton/Mercer area by 2015. Seventy-nine homeless veterans were identified and housed no later than December 31, 2015. In addition, the government officials declared Functional Zero which states that episodes of homelessness among veterans will be brief, rare, and prioritized.

The City of Trenton, Department of Health and Human Services is the lead agency for planning and the grant application for the CoC Program. The CoC is comprised of over 30 social service providers; both governmental and non-profit organizations.

The Trenton/Mercer CoC coordinates a broad array of services that includes, but is not limited to:

- Outreach Assessments
- Prevention of Homelessness
- Emergency Shelter Services
- Rapid Rehousing
- Transitional Housing
- Case management

- Support Services
- Permanent Housing
- Education Resources

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

The Trenton/Mercer CoC worked with the New Jersey Policy academy to develop the State's discharge plan. The vision for this plan is one that plans for greater coordination of services and programs required to address homelessness in New Jersey including the promotion of prevention strategies and services to prevent homelessness and reduce the risk of homelessness for families and individuals.

The New Jersey Department of Human Services Division of Mental Health Services, New Jersey Department of Children and Families, Division of Youth and Family Services, Division of Developmental Disabilities, and the New Jersey Department of Corrections in conjunction with the Department of Health and Senior Services Division of AIDS, prevents discharges from facilities without the immediate provision of shelter. Thus, the States plan guarantees no persons being discharged from and institutional setting into homelessness.

Thus, because Foster Care in New Jersey is a statewide system it is part of this statewide discharge policy. Specially, the case worker works with the youth to identify available Trenton and Mercer County City and County resources and appropriate housing. Under current New Jersey child welfare reform legislation, several new programs have been implemented that allow for a more seamless transition from youth to adulthood. Many of these programs include permanent housing.

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

The City of Trenton and the CoC have a valuable partner in the Mercer Alliance to End Homelessness. In 2009, the Alliance spearheaded efforts to shift the CoC's efforts to combat homelessness in Trenton from a sheltering model to a rehousing model. The Alliance has been successful at working the County Board of Social Services and City Department of Social Services to leverage significant resources.

Families receiving rapid re-housing have been very successful at remaining stably housed. Since the CoC transitioned to a rehousing service model 94% of families that were rehoused did not become homeless again. Pilot projects targeting the singles population, during the same period of time, show similar success with 98.5% of participants not returning to homelessness.



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

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

The Trenton Housing Authority (THA) provides public housing within the City of Trenton. THA will continue to use its Capital Fund grant to make, physical, operational and management improvements at its various housing developments and administrative sites.

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

THA has resident councils in its developments. These resident councils have input/involvement with THA management operations and modernization needs. Resident council officers serve on THA's Resident Advisory Board (RAB).

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

The Housing Authority is not considered to be a troubled PHA.

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

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

As described in the Consolidated Plan, there are two key issues that are currently limiting the ability of would-be purchasers of government-subsidized homes to obtain mortgages. The first is the requirement of many government agencies that there be a second mortgage recorded on properties for the amount of the subsidy that has gone into the home, to help protect the public investment. This frequently raises the loan to value ratio to well beyond both the sales price and the appraised value of the home, creating a situation lenders perceive as high risk, despite the fact that these liens are subordinated to the lender's first mortgage. This practice is being required not only by the state, but also by many county and municipal governments in NJ, and is being applied to homes funded by HOME, the Neighborhood Stabilization Program, Balanced Housing and other programs.

The second issue is that many housing subsidy programs require affordability controls in the form of deed restrictions that do not extinguish in the case of foreclosure. It has become a problem over the last few years because lenders are relying increasingly on FHA to insure their mortgages, rather than private mortgage insurance companies, and FHA rules prohibit them from insuring mortgages that have deed restrictions that survive foreclosure. While this rule has been on the books at FHA for years, it apparently wasn't aggressively enforced until recently.

These issues combine in a way that is severely limiting the availability of home purchase financing for subsidized homes in Trenton.

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

The chief obstacle to meeting underserved needs is a lack of, or inadequate, resources -- both financial and human (staffing). The City of Trenton will continue to collaborate with human and social service agencies and the Continuum of Care to identify potential resources for meeting the service needs of City residents. The City will support the efforts of service agencies to maximize the use of available resources and to obtain additional resources whenever possible.

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

Lead-based paint abatement is an eligible rehabilitation program, and participation in the City's housing rehabilitation programs will reduce the number of homes with lead-based paint hazards. In April 2016, the City successfully applied for a Lead Hazard Reduction Demonstration Grant for approximately \$2 million. CDBG funds will be used as match toward that grant.

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

The resources that the City of Trenton has to reduce the number of persons with incomes below the poverty level are limited. The City will continue to pursue and support various economic development and housing activities in an effort to provide an environment that will attract or retain businesses or facilitate the expansion of existing businesses thereby securing employment and increased incomes for City residents.

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

The City of Trenton relies on a network of public sector, private sector, and non-profit organizations to deliver needed housing and community development services to City residents, particularly the homeless and special needs populations. Many of the organizations in the network operate on a county or regional level.

The demand for services greatly exceeds the available resources. The City of Trenton will continue to collaborate with human and social service agencies and the Trenton/Mercer County Continuum of Care (CoC) to identify potential resources for meeting the service needs of City residents. The City will support the efforts of service agencies to obtain any available or future resources.

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

The Department of Housing and Economic Development (HE&D) is the lead agency responsible for administering the City's CDBG, HOME and ESG programs. HE&D works with the Department of Health and Human Services, the Department of Public Works and the Department of Inspections to coordinate activities undertaken in the Action Plan.

The Trenton/ Mercer CoC is a planning committee that reviews, evaluates , maintains and develops ongoing strategies to address quality of life issues for the residents of Mercer County who may be homeless or in jeopardy of homelessness. The CoC has developed a system-wide approach for implementation of the HEARTH Act which is to consolidate homeless assistance programs, codify the CoC planning process, and establish a goal of ensuring that families who become homeless return to permanent housing with 30 days.

The Mercer Alliance to End Homelessness, the Mercer County CoC, and County of Mercer County have all been partners in the development of this Action Plan.

Each sub-recipient will match its allocation of ESG funds dollar for dollar in one of the following ways as outlined in 24 CFR 576.51(a)(b): cash; the value or fair rental value of any donated material or building; value of any lease on a building; any salary paid to staff to carry out the program activities; and the value of the time and services contributed by volunteers to carry out program activities. The Sub-recipient may use any reasonable method to establish a fair market

value when calculating or determining the value of any donated material or building, or any lease.

In addition, the City of Trenton, Office of Adult and Family Services provides a number of services which address the needs of persons who are not homeless, disabled, mentally & physically ill and who require supportive housing . These services include: (a) rental assistance to families and individuals in order to prevent homelessness (b) intensive and comprehensive case management services (c) referrals to other social services agencies which include substance abuse, mental health counseling, medical and dental services and educational and occupational training (e) referrals for emergency food, clothing and furniture (f) provide information for budget management, cleaning up personal credit, buying a home and preventing foreclosures. The City continues to work with a host of social service providers including:

- Enable, Inc- makes housing accessible to persons with disabilities
- Mercer Arc - provides services for the developmentally disabled
- Family Guidance Center- operates a Consumer Credit Counseling component and representative payee services for recipients of Social Security Income (SSI) and Social Security Disability Income (SSDI)
- Greater Trenton Behavioral Healthcare - provides supportive services focus on mental health issues
- Mercer County Office on Aging - provides supportive services, meals and other services to the elderly
- Trenton Treatment Center - provides substance abuse counseling and treatment to drug and alcohol addicts

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

In 2013, the City completed an Analysis of Impediments to Fair Housing. While this document did not focus exclusively on affordable housing, there were several initiatives identified to address barriers. For a more thorough discussion of this topic, please see refer to that document on the City's website ([www.trentonnj.org](http://www.trentonnj.org)).

The most significant barrier in 2015 to affordable housing in Trenton was, and continues to be, the difficulty with home buyer financing. The City has outlined several new initiatives for 2015 to help address housing needs, including a Homesteading Program and the auctioning of City-owned properties.

In addition, as evidenced in the City's Analysis of Impediments, language barriers contribute to undeserved needs in the community. In addition to hiring an additional CDBG- funded staff person that is bi-lingual, several activities funded by the CDBG program are directly aimed at serving those with language barriers. The most significant is the Latin American Legal Defense and Education Fund (LALDEF).

## **CR-40 - Monitoring 91.220 and 91.230**

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

An annual project completion report is required of all subrecipients.

ESG sub-recipients are required under the HEARTH Act to report client level data in the Homeless Management Information System (HMIS) that will be tracked for data quality and performance standards. To assist in improving the quality of HMIS data, the City utilizes \$25,000 from its ESG allocation to hire a part time data entry clerk trained on HMIS troubleshooting.

The City of Trenton is responsible for monitoring compliance to ensure that HOME funds are used in accordance with all program requirements and for taking appropriate action when performance problems arise. City staff in the Division of Housing Production is responsible for oversight of the different housing development strategies identified in the Consolidated Plan. Within the Department, the Division of Housing Production is responsible for the overall coordination of housing activities, including determining the extent of financial assistance, implementation and monitoring. The Division is required to monitor and inspect HOME-assisted units for compliance with program rules. The major monitoring compliance requirements for the HOME Program are: Project Eligibility, Household Eligibility and Recordkeeping. In addition, rental housing projects also must be subject to on-site inspections to ensure compliance with property standards, rent limits and occupancy requirements. The rules require a review of a "sufficient sample" of units and files to make a reasonable determination of compliance.

The City has revised its rehabilitation standards per the HOME requirements at 24 CFR Part 200.925 or 200.926 to reflect the requirements of the New Jersey Rehabilitation Subcode. The City of Trenton Housing Monitoring Form is used for monitoring. The goals of the inspection process are: to ensure the property remains operationally efficient; is competitive within the marketplace; and is of the highest quality housing for the targeted population, and that maintenance, repair and capital improvements are made when necessary.

The City's monitoring responsibilities with respect to project eligibility are to use HOME Funds to develop and support affordable rental housing and homeownership through:

1. Acquisition of rental and/or homeownership housing (including assistance to home buyers);
2. New construction, reconstruction, or moderate or substantial rehabilitation of non-luxury ownership and/or rental housing with suitable amenities; and
3. For documenting income eligibility of beneficiaries of any HOME or CDBG funding, the

City of Trenton uses the guidelines of the HUD Section 8 Program/Part 5 method to compute a household's annual income.

When a subrecipient accepts HOME/ESG/CDBG funds, it also accepts the responsibility to ensure that those funds are spent for the purpose of the program, and in accordance with all applicable Federal regulations, state and local laws. The subrecipient retains this responsibility even when it relies on other housing partners to carry out all or a portion of its activities. Noncompliance with Program rules by any entity can lead to any number of consequences, including the repayment of funds to the City of Trenton.

While current staffing levels may not allow sufficient resources to be dedicated to monitoring activities, the City does recognize that monitoring is important for evaluating the effectiveness of operating procedures and systems. Monitoring is used to evaluate several functions within a subrecipient's operational system, including Financial and Administrative, Program Operations, and Projects.

Monitoring compliance falls into three general areas:

- Administrative and Financial Monitoring ensures that the subrecipient is administering the program properly, with necessary fiscal controls. It involves the review of the rate of commitment and timely completion of projects, adherence to policies and procedures adopted by the PJ, enforcement of written agreements, compliance with administrative requirements, adequacy of internal controls, eligibility of housing partners, timely and accurate reporting to the City of Trenton.
- Program Monitoring determines whether the subrecipient, has the proper procedures, forms, and files in place to carry out programs in compliance with applicable requirements. It may involve the examination of applications, policies and procedures, program files, financial files, project files structure and maintenance.
- Project Monitoring ensures that each funded project meets all project requirements such as subsidy levels, beneficiaries, and eligibility requirements as specified by the applicable program. The City of Trenton's project monitoring involves the examination of, individual project files, financials and progress reports.

Subrecipients are responsible for appropriate expenditure of all Program funds and monitoring of all entities involved in the expenditure of program funds. In the coming year, the City of Trenton will enhance subrecipient agreements to include a monitoring plan for all projects -- setting monitoring objectives, procedures, staff, and schedule of monitoring visits.

Typically, monitoring involves reviewing an organization's stated policies and procedures to determine if the policies have adequate controls to ensure program compliance, and then reviewing files to determine whether or not the policies and procedures are carried out. On-site visits to subrecipient offices, as well as construction site visits and post-construction site visits provide critical information about the accuracy of program files. In the coming Program Year, at least one site visit will be made for each project. Imposing sanctions may be necessary to ensure compliance with requirements, regulations, and to ensure the program meets its goals and objectives.

Sanctions consist of the following:

- Letter communicating results of findings from the monitoring review to the appropriate staff person with a request for a written response and timeline for correction of identified issues.
- Written warning if matter is not resolved in a timely manner.
- Follow up site visit by Program Monitor to document that problems have not been resolved.

If problems are not resolved, a meeting will be set-up with all parties involved.

Serious lack of compliance shall result in:

- A reduced award and refund of program funds
- Banning of subrecipient from receiving additional City funds for a period of time or until such time as the subrecipient can demonstrate the existence of adequate controls to ensure compliance.

## **Monitoring Affirmative Marketing**

The affirmative marketing plan communicates to the general public that the City of Trenton's housing programs are administered in a nondiscriminatory manner to all persons regardless of race, color, national origin, age, religion, sex, disability or familial status. The purpose of the AFHMP is to make residents aware of the affordable housing opportunities generated by HOME Program activities

All marketing material includes the equal housing opportunity message, or the equal housing opportunity logo or slogan as part of the outreach to the general community. This information is included in all written outreach tools including press releases, newsletters, brochures, advertisements, direct mail solicitations, and related advertising.

Developers are required to identify for each funded development, populations that are least likely to apply without special outreach, and document the ways in which they are tailoring affirmative marketing requirements to attract these populations accordingly.

All marketing of HOME-assisted housing has to be city-wide and all advertising has to be placed in sources of wide circulation. This includes specifying media sources used in advertising to particular audiences such as a newspaper that serves the Hispanic population or the Polish population has to be noted. All advertisements, brochures, and other written materials shall be published in multiple languages, in order to reach non-English-speaking audiences.

## **Monitoring Income Eligibility**

The determination of an applicant's income eligibility and eligibility as a family is done within six months of the time at which the applicant receives assistance or occupies the unit. For rental housing, family income and family size must be determined annually for the compliance period. Additionally, income must be verified at time of application or certification. Verification can be done with third party written documents, written notes of third party conversations, or first-hand documentation provided by the recipient. For rental housing, verification of income is required when a tenant first occupies a unit, and every sixth year thereafter during the compliance period. In interim years, a tenant certification is sufficient.

For the City of Trenton's homeownership program, loan underwriting criteria comes into play. Loan qualification is coordinated with the timing of income certification to ensure that unnecessary certifications do not occur. The lending criteria are established by participating lenders and are reasonably related to the buyer's ability to undertake homeownership responsibilities and repay the loan. The City of Trenton also pays close attention to the conflict of interest provisions at 92.356 and standards set forth in the Local Government Ethics Law at N.J.S.A. 40A :9-22.1, et seq. Specifically, the Code of Ethics for local officers and employees set forth at N. J.S.A. 40A :9-22.5 and N. J.S.A 40:69A - 163.

## **Monitoring Housing Records**

The City's monitoring responsibilities with respect to recordkeeping include maintaining program records for the retention period (§954.400 to §954.402) and other federal requirements (§954.4)



that apply for the duration of the period of affordability, as well retained for three years after the required period of affordability specified in §954.306 or §954. 307, as applicable or three years after closeout of the fund's including refinancing guidelines, and evidence that housing projects meet subsidy layering guidelines. All HOME subrecipients are required to establish a record keeping system that will make it easy to confirm that program regulations are being met including HOME rent levels and utility allowance calculations. If HOME- assisted units are floating, the owner must clearly document how the HOME occupancy targets are being met (i.e. rental logs that show that HOME-assisted units were properly replaced). Files will document that each HOME-assisted unit is occupied by an income-eligible tenant and will include the tenant's application, initial income verification, subsequent annual re-certifications and the tenant's lease. The owner will also be required to develop a tenant selection policy which describes the procedure for reviewing applications for housing, criteria to identify eligible tenants, create waiting lists from which tenants will be selected and provide prompt written notification of rejections.

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

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

Through a collaborative planning process, involving a broad range of public and private agencies, the City has developed a single, consolidated planning and application document for the use of federal entitlement funds available through the CDBG, HOME, and ESG Programs. In agreement with 24 CFR 91.115(e) Trenton has adopted a Citizen Participation Plan describing the citizen participation requirements of its CDBG program. The Citizen Participation Plan is on file at the City Department of Housing & Economic Development and on the Department's web site.

The City supplements the process described in the Citizen Participation Plan with the use of an email list. Subscriptions to the list are available to anyone via the City's website (<http://www.trentonnj.org/Cit-eAccess/MailingList/index.cfm?ID=79&TID=55&TPID=9810>).

There are currently more than 250 organizations and individuals signed up to the mailing list. The email list is used to announce upcoming hearings, distribute slides and handouts from those hearings, and advertise the availability of critical documents, such as this Action Plan.

## **CR-45 - CDBG 91.520(c)**

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

The City will have to adapt future programs to accommodate any reduction in funds that HUD may impose due to unallowed costs and/or timeliness issues. This will result in less funds being available for public services. There will be more emphasis on homeownership and job creation activities to generate systemic change in the community.

## **CR-50 - HOME 91.520(d)**

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

No on-site inspections were conducted this past year. On-site inspections are planned for the next year.

**Provide an assessment of the jurisdiction's affirmative marketing actions for HOME units. 92.351(b)**

Developers must submit an Affirmative Marketing Plan with their HOME application. The steps outlined must be approved by the City to ensure that the developers will reach the targeted audience.

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

The City has received no program income for the HOME Program.

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

The City will continue to support its goals of maintaining and expanding affordable housing by utilizing CDBG and HOME allocations to create new opportunities for affordable rental and homeownership and rehabilitate existing affordable units. The amount of funds allocated for these activities for FY15 was \$371,630 (CDBG) and \$483,172 (HOME).

The City is in the process of creating a homebuyer program to assist low and moderate income homebuyers with downpayment and closing cost assistance to enable them to purchase a home. The housing rehabilitation program has continued to provide assistance to existing homeowners to rehabilitate their homes.

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

ESG Supplement to the CAPER in *e-snaps*

For Paperwork Reduction Act

### 1. Recipient Information—All Recipients Complete

#### Basic Grant Information

Recipient Name	TRENTON
Organizational DUNS Number	136478000
EIN/TIN Number	216001242
Identify the Field Office	NEWARK
Identify CoC(s) in which the recipient or subrecipient(s) will provide ESG assistance	

#### ESG Contact Name

Prefix	Mr
First Name	Marc
Middle Name	E
Last Name	Leckington
Suffix	0
Title	Chief of Housing Production

#### ESG Contact Address

Street Address 1	319 East State Street
Street Address 2	0
City	Trenton
State	NJ
ZIP Code	-
Phone Number	6099893536
Extension	0
Fax Number	6099894243
Email Address	mleckington@trentonnj.org

#### ESG Secondary Contact

Prefix	Mr
First Name	Samuel
Last Name	Zubah
Suffix	0
Title	Accountant
Phone Number	6099893162
Extension	0

Email Address

szubah@trentonnj.org

## 2. Reporting Period—All Recipients Complete

Program Year Start Date 07/01/2015

Program Year End Date 06/30/2016

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

**Subrecipient or Contractor Name:** TRENTON

**City:** Trenton

**State:** NJ

**Zip Code:** 08608, 1809

**DUNS Number:** 136478000

**Is subrecipient a victim services provider:** N

**Subrecipient Organization Type:** Unit of Government

**ESG Subgrant or Contract Award Amount:** 31451.75

**Subrecipient or Contractor Name:** HOMEFRONT - TLC, INC.

**City:** Lawrenceville

**State:** NJ

**Zip Code:** 08648, 4561

**DUNS Number:**

**Is subrecipient a victim services provider:** N

**Subrecipient Organization Type:** Other Non-Profit Organization

**ESG Subgrant or Contract Award Amount:** 10000

**Subrecipient or Contractor Name:** Rescue Mission of Trenton

**City:** Trenton

**State:** NJ

**Zip Code:** 08609, 1008

**DUNS Number:** 079486460

**Is subrecipient a victim services provider:** N

**Subrecipient Organization Type:** Faith-Based Organization

**ESG Subgrant or Contract Award Amount:** 15000

**Subrecipient or Contractor Name: Catholic Charities**  
**City: Trenton**  
**State: NJ**  
**Zip Code: 08618, 5705**  
**DUNS Number: 069057640**  
**Is subrecipient a victim services provider: N**  
**Subrecipient Organization Type: Faith-Based Organization**  
**ESG Subgrant or Contract Award Amount: 135655.25**

**Subrecipient or Contractor Name: Womanspace**  
**City: Lawrenceville**  
**State: NJ**  
**Zip Code: 08648, 4657**  
**DUNS Number: 051974186**  
**Is subrecipient a victim services provider: Y**  
**Subrecipient Organization Type: Other Non-Profit Organization**  
**ESG Subgrant or Contract Award Amount: 22250**

## CR-65 - Persons Assisted

### 4. Persons Served

#### 4a. Complete for Homelessness Prevention Activities

Number of Persons in Households	Total
Adults	
Children	
Don't Know/Refused/Other	
Missing Information	
<b>Total</b>	

Table 14 – Household Information for Homeless Prevention Activities

#### 4b. Complete for Rapid Re-Housing Activities

Number of Persons in Households	Total
Adults	
Children	
Don't Know/Refused/Other	
Missing Information	
<b>Total</b>	

Table 15 – Household Information for Rapid Re-Housing Activities

#### 4c. Complete for Shelter

Number of Persons in Households	Total
Adults	
Children	
Don't Know/Refused/Other	
Missing Information	
<b>Total</b>	

Table 16 – Shelter Information

**4d. Street Outreach**

<b>Number of Persons in Households</b>	<b>Total</b>
Adults	
Children	
Don't Know/Refused/Other	
Missing Information	
<b>Total</b>	

**Table 17 – Household Information for Street Outreach**

**4e. Totals for all Persons Served with ESG**

<b>Number of Persons in Households</b>	<b>Total</b>
Adults	
Children	
Don't Know/Refused/Other	
Missing Information	
<b>Total</b>	

**Table 18 – Household Information for Persons Served with ESG**

**5. Gender—Complete for All Activities**

	<b>Total</b>
Male	
Female	
Transgender	
Don't Know/Refused/Other	
Missing Information	
<b>Total</b>	

**Table 19 – Gender Information**



**6. Age—Complete for All Activities**

	<b>Total</b>
Under 18	
18-24	
25 and over	
Don't Know/Refused/Other	
Missing Information	
<b>Total</b>	

**Table 20 – Age Information**

**7. Special Populations Served—Complete for All Activities**

**Number of Persons in Households**

<b>Subpopulation</b>	<b>Total</b>	<b>Total Persons Served – Prevention</b>	<b>Total Persons Served – RRH</b>	<b>Total Persons Served in Emergency Shelters</b>
Veterans				
Victims of Domestic Violence				
Elderly				
HIV/AIDS				
Chronically Homeless				
<b>Persons with Disabilities:</b>				
Severely Mentally Ill				
Chronic Substance Abuse				
Other Disability				
Total (unduplicated if possible)				

**Table 21 – Special Population Served**

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

### 8. Shelter Utilization

Number of New Units – Rehabbed	0
Number of New Units – Conversion	0
Total Number of bed - nights available	55,845
Total Number of bed - nights provided	53,161
Capacity Utilization	95%

Table 22 – Shelter Capacity

### 9. Project Outcomes Data measured under the performance standards developed in consultation with the CoC(s)

The City continues to have good relationships with many of its state and local partners, including entities such as the Mercer County Alliance to End Homelessness, the Trenton Housing Authority, NJHMFA, State and County entities, supportive service providers, non-and for-profit developers, and various financial institutions. NJHMFA's UNIAP process has streamlined the development process. Additionally, Mercer County Human Services Advisory Council sponsors Homeless Emergency Assistance and Affordable Housing Committee (HEAAH) meetings every month. The objective of the HEAAH committee meetings is to encourage dialogue and learning among the various agencies.

In 2011, the Trenton/Mercer CoC drafted by-laws and created an Executive Committee. The purpose of the Executive Committee is annually to set priorities for homelessness services and housing based on analysis of community data and need, in accordance with HUD and the State of New Jersey; to make funding recommendations to the Collaborative Applicant for the annual allocation from the U.S. Department of HUD; to assure that programs receiving HUD funding are appropriately monitored and meet program performance standards; to identify additional funding sources that contribute to the community's ability to respond to homeless populations; and to monitor the effective functioning of the COC, including review of attendance.

All ESG activities are setup as programs in the CoC's HMIS system. The CoC's System Oversight Committee (which includes the City's CDBG Coordinator) meet monthly to review the accomplishments and challenges to the implementation of all CoC and ESG-funded activities. As necessary, representatives from the sponsors of troubled projects are invited to future meetings to help resolve issues.

## 10. Shelter Utilization

*Table 23 – Shelter Capacity*

Number of New Units – Rehabbed	
Number of New Units – Conversion	
Total Number of bed - nights available	
Total Number of bed - nights provided	
Capacity Utilization	

## 11. Project Outcomes Data measured under the performance standards developed in consultation with the CoC(s)

## CR-75 – Expenditures

### 11. Expenditures

#### 11a. ESG Expenditures for Homelessness Prevention

	Dollar Amount of Expenditures in Program Year		
	2013	2014	2015
Expenditures for Rental Assistance	0	0	0
Expenditures for Housing Relocation and Stabilization Services - Financial Assistance	0	0	0
Expenditures for Housing Relocation & Stabilization Services - Services	0	0	0
Expenditures for Homeless Prevention under Emergency Shelter Grants Program	0	0	0
<b>Subtotal Homelessness Prevention</b>	<b>0</b>	<b>0</b>	<b>0</b>

Table 24 – ESG Expenditures for Homelessness Prevention

#### 11b. ESG Expenditures for Rapid Re-Housing

	Dollar Amount of Expenditures in Program Year		
	2013	2014	2015
Expenditures for Rental Assistance	0	0	0
Expenditures for Housing Relocation and Stabilization Services - Financial Assistance	0	0	0
Expenditures for Housing Relocation & Stabilization Services - Services	0	120,000	0
Expenditures for Homeless Assistance under Emergency Shelter Grants Program	0	0	0
<b>Subtotal Rapid Re-Housing</b>	<b>0</b>	<b>120,000</b>	<b>0</b>

Table 25 – ESG Expenditures for Rapid Re-Housing

#### 11c. ESG Expenditures for Emergency Shelter

	Dollar Amount of Expenditures in Program Year		
	2013	2014	2015
Essential Services	0	0	0
Operations	0	6,707	0
Renovation	0	0	0
Major Rehab	0	0	0

Conversion	0	0	0
<b>Subtotal</b>	<b>0</b>	<b>6,707</b>	<b>0</b>

Table 26 – ESG Expenditures for Emergency Shelter

#### 11d. Other Grant Expenditures

	Dollar Amount of Expenditures in Program Year		
	2013	2014	2015
HMIS	4,147	0	0
Administration	0	0	0
Street Outreach	0	0	0

Table 27 - Other Grant Expenditures

#### 11e. Total ESG Grant Funds

Total ESG Funds Expended	2013	2014	2015
130,854	4,147	126,707	0

Table 28 - Total ESG Funds Expended

#### 11f. Match Source

	2013	2014	2015
Other Non-ESG HUD Funds	0	0	0
Other Federal Funds	0	0	0
State Government	0	0	0
Local Government	0	0	0
Private Funds	0	0	0
Other	0	0	0
Fees	0	0	0
Program Income	0	0	0
<b>Total Match Amount</b>	<b>0</b>	<b>0</b>	<b>0</b>

Table 29 - Other Funds Expended on Eligible ESG Activities

#### 11g. Total

Total Amount of Funds Expended on ESG Activities	2013	2014	2015
130,854	4,147	126,707	0

Table 30 - Total Amount of Funds Expended on ESG Activities

