



Sixth Program Year Action Plan

The CPMP Sixth Annual Action Plan includes the [SF 424](#) and Narrative Responses to Action Plan questions that CDBG, HOME, HOPWA, and ESG grantees must respond to each year in order to be compliant with the Consolidated Planning Regulations. The Executive Summary narratives are optional.

Narrative Responses

GENERAL

Executive Summary

The Executive Summary is required. Include the objectives and outcomes identified in the plan and an evaluation of past performance.

Program Year 6 Action Plan Executive Summary:

Year 6 is the first year in the City's 5-Year Consolidated Plan which is being submitted simultaneously for HUD approval. Though the City's funding is limited, the Year 6 Plan proposes to fund a total of 8 initiatives to address the community's priority needs of affordable housing opportunity, education and counseling, and economic opportunity. These initiatives, along with the goals of each, are outlined in this document.

General Questions

1. Describe the geographic areas of the jurisdiction (including areas of low income families and/or racial/minority concentration) in which assistance will be directed during the next year. Where appropriate, the jurisdiction should estimate the percentage of funds the jurisdiction plans to dedicate to target areas.
2. Describe the basis for allocating investments geographically within the jurisdiction (or within the EMSA for HOPWA) (91.215(a)(1)) during the next year and the rationale for assigning the priorities.
3. Describe actions that will take place during the next year to address obstacles to meeting underserved needs.
4. Identify the federal, state, and local resources expected to be made available to address the needs identified in the plan. Federal resources should include Section 8 funds made available to the jurisdiction, Low-Income Housing Tax Credits, and competitive McKinney-Vento Homeless Assistance Act funds expected to be available to address priority needs and specific objectives identified in the strategic plan.

Program Year 6 Action Plan General Questions response:

This Year 6 Action Plan covers all of the City of Bowling Green, including annex areas. Areas where low income families and/or racial and ethnic minorities reside are included in this plan and are outlined in the 5 Year Consolidated Plan. Special emphasis is given to Census Tracts 101, 102, and 103, which is the previously

designated Neighborhood Revitalization Strategy Area, based on its previous federal Enterprise Community status. The NRSA has the highest concentration of poverty in the City.

The City is a direct entitlement for Community Development Block Grant funding, but does not receive a direct allocation of HOME or McKinney-Vento funding. HOME is available on a competitive basis through Kentucky Housing Corporation. McKinney-Vento funding is distributed by Kentucky Housing Corporation through the Continuum of Care to appropriate agencies; the City does not receive any of this funding. The City administers a Section 8 Housing Choice Voucher tenant-based program; the current allocation is for 606 vouchers.

Managing the Process

1. Identify the lead agency, entity, and agencies responsible for administering programs covered by the consolidated plan.
2. Identify the significant aspects of the process by which the plan was developed, and the agencies, groups, organizations, and others who participated in the process.
3. Describe actions that will take place during the next year to enhance coordination between public and private housing, health, and social service agencies.

Program Year 6 Action Plan Managing the Process response:

The City of Bowling Green, through its Housing and Community Development Department, is the responsible lead agency for administering the Community Development Block Grant program. The City also enters into contracts with subrecipients as needed to administer certain projects each year. Each year, these agencies are directly invited to participate in the planning process, as are new agencies that provide services to low/moderate income populations; advertising is also published in the Daily News and posted on the City's website.

For Year 6, the City established a new agency application process for CDBG funding that was not previously in place. The City issued a Request for Proposals for any agency to apply for CDBG funding to provide services that would meet one of the established priority needs identified in the Consolidated Plan – Affordable Housing Opportunity, Economic Opportunity, and Education and Counseling. The RFP was advertised in the Daily News, posted on the City's website, and directed mailed to area agencies. Nine applications were received, totaling nearly \$1.25 million in funding requests. These applications were evaluated and scored by a five member citizen review committee, appointed by the City Commission. The committee made recommendations for funding for inclusion in this Year 6 Action Plan.

Following the evaluation, scoring, and recommendation of agency applications, the committee was invited to comment on the process and suggest improvements for the next year's application round. In addition, the City will be surveying applicant agencies, and non-applicant agencies who showed interest, to determine what improvements can be made to the application process.

Citizen Participation

1. Provide a summary of the citizen participation process.
2. Provide a summary of citizen comments or views on the plan.

3. Provide a summary of efforts made to broaden public participation in the development of the consolidated plan, including outreach to minorities and non-English speaking persons, as well as persons with disabilities.
4. Provide a written explanation of comments not accepted and the reasons why these comments were not accepted.

*Please note that Citizen Comments and Responses may be included as additional files within the CPMP Tool.

Program Year 6 Action Plan Citizen Participation response:

Year 6 is the first year of a new Consolidated Plan. A public hearing regarding housing and community development needs was held in October 2008 and a public hearing and comment period for the Consolidated Plan was held in January 2009. This Year 6 Annual Action Plan was drafted based on citizen comments and the priority needs that were established through the Consolidated Planning process. The Action Plan was made available for public review and comment from March 27, 2009, through April 27, 2009. A public hearing regarding the draft plan was held on April 7, 2009. The following comments were received:

Institutional Structure

1. Describe actions that will take place during the next year to develop institutional structure.

Program Year 6 Action Plan Institutional Structure response:

As noted in the Consolidated Plan, the City enjoys a close relationship with several local service agencies. This Year 6 Annual Action Plan will recognize on-going relationships or establish new relationships with the following agencies:

Bellewood Presbyterian Homes for Children to provide housing/services to older youth who are aging out of foster care.

Bowling Green Human Rights Commission for a Fair Housing Education and foreclosure intervention program.

Community Action of Southern Kentucky, Inc. for an expanded facility for public transit and the weatherization programs.

Housing Assistance and Development Services (HANDS) for foreclosure intervention/emergency assistance and for homeowner emergency repairs and accessibility accommodations.

Housing Authority of Bowling Green for the small business training and technical assistance program.

Live the Dream Development, Inc., for the rental conversion/home rehab program.

Community Ventures Corporation for a microenterprise development program.

Each of these agencies will receive on-going technical assistance from the City staff to ensure that project goals are met and that CDBG regulations are followed. The City also works closely with the Barren River Area Development District, contracting with the office for various administrative services.

Monitoring

1. Describe actions that will take place during the next year to monitor its housing and community development projects and ensure long-term compliance with program requirements and comprehensive planning requirements.

Program Year 6 Action Plan Monitoring response:

The City is responsible for the administration of the CDBG program and the implementation of the Consolidated Plan and each Annual Action Plan to ensure proper and timely compliance with all CDBG program requirements. HCD staff uses HUD's Integrated Data Information System (IDIS) and the City's New World financial software to manage both the financial aspects of the program and the performance of the program.

All subrecipients must enter into a written agreement prior to release of funds from the City or any project activity by the subrecipient; this agreement must also receive formal approval by the City Commission and by the board of the subrecipient. The agreement sets forth the proposed activities of the program and the responsibilities of both the subrecipient and the City, particularly with respect to CDBG regulations. A sample of the agreement is included in Appendix C.

To receive reimbursement of expenditures from the City, each subrecipient must provide proper documentation, including monthly report of activity, copies of invoices, and a request for payment. HCD staff verifies the invoice and documentation and processes for payment. As part of this verification process, a desk audit of each subrecipient program is performed monthly, including a review of all activities undertaken with CDBG funds and determination of expense eligibility, to ensure that all programming and expenditures are within the parameters set in the written agreement and the regulations of the CDBG program. Immediate action is taken in the event there are discrepancies with the subrecipient's programming or expenditures, including contacting the subrecipient by telephone, electronic or US mail, or through a more comprehensive site visit. If there are unusual situations or problems identified through a desk review, HCD will schedule a technical assistance or field monitoring visit with the subrecipient. The HCD staff conducts at least one on-site technical assistance meeting with the subrecipient in each funding year.

Lead-based Paint

1. Describe the actions that will take place during the next year to evaluate and reduce the number of housing units containing lead-based paint hazards in order to increase the inventory of lead-safe housing available to extremely low-income, low-income, and moderate-income families, and how the plan for the reduction of lead-based hazards is related to the extent of lead poisoning and hazards.

Program Year 6 Action Plan Lead-based Paint response:

During Year 6, the City will hold a subrecipient contract with Live the Dream Development for the Rental Conversion program (for previously allocated Year 5 funding as well as a minimal amount of Year 6 funding). The City also holds a contract for administrative services for the Barren River Area Development District for a Homeowner Rehab program. Both the Rental Conversion program and the Homeowner Rehab program have established practices in place for identifying and remediating lead-based paint hazards in the project homes.

HOUSING

Specific Housing Objectives

*Please also refer to the Housing Needs Table in the Needs.xls workbook.

1. Describe the priorities and specific objectives the jurisdiction hopes to achieve during the next year.
2. Describe how Federal, State, and local public and private sector resources that are reasonably expected to be available will be used to address identified needs for the period covered by this Action Plan.

Program Year 6 Action Plan Specific Objectives response:

Year 6 CDBG funding will be allocated to five programs related to the priority housing needs identified in the Consolidated Plan:

- (1) Emergency Home Repair and Accessibility – HANDS, Inc., will receive \$10,000 to provide emergency home repairs for low/moderate income homeowners and to construct residential accessibility ramps, handrails, and other improvements for the disabled. The funding will be used to purchase materials and volunteers will be the primary labor source. It is estimated that at least 10 households will receive assistance through this program.
- (2) Homeownership Preservation – HANDS, Inc., will receive \$15,000 to provide “rescue funds” to low/moderate income homeowners that are facing foreclosure. HANDS provides one-on-one counseling with the household and works with mortgage companies to work out solutions for the particular mortgage crisis. The CDBG funding will be used as a last resort as one time emergency assistance to keep the family from losing its home. At least 15 households will be assisted through this program.
- (3) Independent Living Program – Bellewood Presbyterian Home for Children, Inc., will use \$150,000 in CDBG to acquire a four unit residential property to provide transitional housing for youths aged 18 to 21 who have aged out of foster care. Bellewood will provide individualized case management and supportive services to assist the youths in successful transition to independent living.
- (4) Fair Housing Education Outreach and Foreclosure Prevention – Bowling Green Human Rights Commission will utilize \$15,000 in CDBG funding to continue its fair housing education efforts through workshops, presentations, information distribution, and receipt of housing complaints. HRC will also undertake foreclosure intervention and prevention counseling.
- (5) Rental Conversion Program – Live the Dream Development, Inc., will receive \$30,000 in CDBG funds to continue the Rental Conversion Program in which LTD acquires single family homes that were previously rental or at-risk, renovate the home with CDBG funding, and re-sell the home for owner occupancy. It is anticipated that one home can be completed with this allocation.

Needs of Public Housing

1. Describe the manner in which the plan of the jurisdiction will help address the needs of public housing and activities it will undertake during the next year to encourage public housing residents to become more involved in management and participate in homeownership.
2. If the public housing agency is designated as "troubled" by HUD or otherwise is performing poorly, the jurisdiction shall describe the manner in which it will provide financial or other assistance in improving its operations to remove such designation during the next year.

Program Year 6 Action Plan Public Housing Strategy response:

The Housing Authority of Bowling Green recently received a special funding allocation of \$1,275,313 through the American Recovery and Reinvestment Act of 2009 which will be used to make capital improvements at existing HABG properties. HABG also received a Section 202 grant for Supportive Housing for the Elderly which will be used to construct a 36 unit residential complex on Double Springs Road; this award included a capital advance of \$3,811,300 and a three year rental subsidy of \$366,300.

As noted in the Housing Section above, HABG, through its affiliate non-profit Live the Dream Development, will receive an allocation of \$30,000 for one unit of homeownership; this is in addition to \$160,000 in Year 5 funding that is to be contracted in April 2009. This City will also be allocating \$50,000 in CDBG funding for HABG to continue its Small Business Training and Technical Assistance program. The City's Section 8 Housing Choice Voucher program also has a long-standing relationship with the Housing Authority, providing homeownership vouchers to the Housing Authority's home buyers when vouchers are available and the household qualifies.

Barriers to Affordable Housing

1. Describe the actions that will take place during the next year to remove barriers to affordable housing.

Program Year 6 Action Plan Barriers to Affordable Housing response:

The City-County Planning Commission is currently developing a new 20 year Comprehensive Plan. This Plan will guide development in Bowling Green and Warren County; after adoption of the Plan by the city and county governments, amendments to the Zoning Ordinance and Subdivision Regulations will be needed to implement the goals and objectives of the Plan. The new Comprehensive Plan and the supplemental Future Land Use Plan will address two barriers that were identified in the Regulatory Reform Task Force's report in 2007: difficulty in getting land zoned for new residential and inadequate land available for large-scale housing development. In addition to the Comprehensive Plan, the HCD Building Division was recently the subject of a Customer Satisfaction Survey in which questions were asked regarding the Division's interaction with builders and developers and ease of obtaining construction permits; the Division rated above average in customer satisfaction, but they are working on implementing several customer suggestions for improvement.

HOME/ American Dream Down payment Initiative (ADDI)

1. Describe other forms of investment not described in § 92.205(b).
2. If the participating jurisdiction (PJ) will use HOME or ADDI funds for homebuyers, it must state the guidelines for resale or recapture, as required in § 92.254 of the HOME rule.
3. If the PJ will use HOME funds to refinance existing debt secured by multifamily housing that is that is being rehabilitated with HOME funds, it must state its refinancing guidelines required under § 92.206(b). The guidelines shall describe the conditions under which the PJ will refinance existing debt. At a minimum these guidelines must:
 - a. Demonstrate that rehabilitation is the primary eligible activity and ensure that this requirement is met by establishing a minimum level of rehabilitation per unit or a required ratio between rehabilitation and refinancing.
 - b. Require a review of management practices to demonstrate that disinvestments in the property has not occurred; that the long-term needs of the project can be met; and that the feasibility of serving the targeted population over an extended affordability period can be demonstrated.
 - c. State whether the new investment is being made to maintain current affordable units, create additional affordable units, or both.
 - d. Specify the required period of affordability, whether it is the minimum 15 years or longer.
 - e. Specify whether the investment of HOME funds may be jurisdiction-wide or limited to a specific geographic area, such as a neighborhood identified in a neighborhood revitalization strategy under 24 CFR 91.215(e)(2) or a Federally designated Empowerment Zone or Enterprise Community.
 - f. State that HOME funds cannot be used to refinance multifamily loans made or insured by any federal program, including CDBG.
4. If the PJ is going to receive American Dream Down payment Initiative (ADDI) funds, please complete the following narratives:
 - a. Describe the planned use of the ADDI funds.
 - b. Describe the PJ's plan for conducting targeted outreach to residents and tenants of public housing and manufactured housing and to other families assisted by public housing agencies, for the purposes of ensuring that the ADDI funds are used to provide down payment assistance for such residents, tenants, and families.
 - c. Describe the actions to be taken to ensure the suitability of families receiving ADDI funds to undertake and maintain homeownership, such as provision of housing counseling to homebuyers.

Program Year 6 Action Plan HOME/ADDI response:

N/A

HOMELESS

Specific Homeless Prevention Elements

*Please also refer to the Homeless Needs Table in the Needs.xls workbook.

1. Sources of Funds—Identify the private and public resources that the jurisdiction expects to receive during the next year to address homeless needs and to prevent homelessness. These include the McKinney-Vento Homeless Assistance Act programs, other special federal, state and local and private funds targeted to homeless individuals and families with children, especially the chronically homeless, the HUD formula programs, and any publicly-owned land or property. Please describe, briefly, the jurisdiction's plan for the investment and use of funds directed toward homelessness.
2. Homelessness—In a narrative, describe how the action plan will address the specific objectives of the Strategic Plan and, ultimately, the priority needs identified. Please also identify potential obstacles to completing these action steps.
3. Chronic homelessness—The jurisdiction must describe the specific planned action steps it will take over the next year aimed at eliminating chronic homelessness by 2012. Again, please identify barriers to achieving this.
4. Homelessness Prevention—The jurisdiction must describe its planned action steps over the next year to address the individual and families with children at imminent risk of becoming homeless.
5. Discharge Coordination Policy—Explain planned activities to implement a cohesive, community-wide Discharge Coordination Policy, and how, in the coming year, the community will move toward such a policy.

Program Year 6 Action Plan Special Needs response:

Kentucky Housing Corporation (KHC) serves as the lead agency for the Balance of State Continuum of Care (CoC). According to KHC's Policy for Funding Consideration, "Kentucky Balance of State CoC is at a Hold Harmless status which means the overall application has reached the maximum pro-rata need for funding as determined by HUD" and any new projects must compete against existing projects that are up for renewal. Locally, three agencies receive funding through the CoC: Barren River Area Safe Space, Inc., Community Action of Southern Kentucky, Inc., and Lifeskills, Inc.

Emergency Shelter Grants (ESG)

(States only) Describe the process for awarding grants to State recipients, and a description of how the allocation will be made available to units of local government.

Program Year 6 Action Plan ESG response:

N/A

COMMUNITY DEVELOPMENT

Community Development

*Please also refer to the Community Development Table in the Needs.xls workbook.

1. Identify the jurisdiction's priority non-housing community development needs eligible for assistance by CDBG eligibility category specified in the Community Development Needs Table (formerly Table 2B), public facilities, public improvements, public services and economic development.
2. Identify specific long-term and short-term community development objectives (including economic development activities that create jobs), developed in accordance with the statutory goals described in section 24 CFR 91.1 and the primary objective of the CDBG program to provide decent housing and a suitable living environment and expand economic opportunities, principally for low- and moderate-income persons.

*Note: Each specific objective developed to address a priority need, must be identified by number and contain proposed accomplishments, the time period (i.e., one, two, three, or more years), and annual program year numeric goals the jurisdiction hopes to achieve in quantitative terms, or in other measurable terms as identified and defined by the jurisdiction.

Program Year 6 Action Plan Community Development response:

In Year 6, the City plans to undertake three community development initiatives with its CDBG allocation. All three meet the priority need of Economic Opportunity as outlined in the 5 year Consolidated Plan:

- (1) Small Business Training and Technical Assistance program – Housing Authority of Bowling Green will receive \$50,000 to continue this partnership with Western Kentucky University's Small Business Development Center. The program proposes to assist 100 new individuals with training and technical assistance, counsel 18 small businesses, and mentor 5 new businesses; in total, the program expects that at least 10 new jobs will be created.
- (2) CVC Bowling Green Microenterprise Development – Community Ventures Corporation, a Community Development Financial Institution, will receive \$25,000 to expand its microenterprise development training and technical assistance program to Bowling Green. CVC will be establishing a new field office that will serve a multi-county area, including Bowling Green and Warren County. At least 15 entrepreneurs/businesses will be served.
- (3) Community Action of Southern Kentucky Annex – Public Transit/Weatherization Departments - \$260,000 will be allocated to Community Action to acquire an existing building for re-use by their public transit and weatherization programs. With the past few years of growth in these programs plus the addition of federal Stimulus funding for both programs, Community Action needs additional facility space. Both programs serve primarily low-to-moderate income individuals and families. It is anticipated that 40 households (at or below 200% of the federal poverty guidelines) will be served by the weatherization program and there will be some 75,000 passenger trips by GO BG transit.

Antipoverty Strategy

1. Describe the actions that will take place during the next year to reduce the number of poverty level families.

Program Year 6 Action Plan Antipoverty Strategy response:

The designated NRSA was based on the federal Enterprise Community designation. Although the Enterprise Community designation expired in December 2008, the City is still targeting initiatives to the three Census tracts that comprise the Enterprise Community. The Year 6 housing initiatives proposed by Live the Dream Development (Rental Conversion) and HANDS (Emergency Repair) are targeted toward properties within the NRSA. Both the Housing Authority's Small Business program and Community Venture's Microenterprise program are economic opportunity tools by which low income individuals and families will receive training and technical assistance in starting a new business. Assisting Community Action in its expansion of the Weatherization and Public Transit programs will also indirectly reduce the number of poverty level families.

NON-HOMELESS SPECIAL NEEDS HOUSING

Non-homeless Special Needs (91.220 (c) and (e))

*Please also refer to the Non-homeless Special Needs Table in the Needs.xls workbook.

1. Describe the priorities and specific objectives the jurisdiction hopes to achieve for the period covered by the Action Plan.
2. Describe how Federal, State, and local public and private sector resources that are reasonably expected to be available will be used to address identified needs for the period covered by this Action Plan.

Program Year 6 Action Plan Specific Objectives response:

As noted in the housing section above, Bellewood Presbyterian Home for Children, Inc., will use \$150,000 in CDBG to acquire a four unit residential property to provide transitional housing for youths aged 18 to 21 who have aged out of foster care.

Bellewood will provide individualized case management and supportive services to assist the youths in successful transition to independent living.

The emergency repairs and accessibility retrofitting initiative by HANDS, Inc., will assist elderly and disabled householders so they can continue to reside in their homes. Expansion of Community Action's Weatherization program will also assist elderly and disabled householders with energy retrofitting to reduce their home heating and cooling costs.

Housing Opportunities for People with AIDS

*Please also refer to the HOPWA Table in the Needs.xls workbook.

1. Provide a Brief description of the organization, the area of service, the name of the program contacts, and a broad overview of the range/ type of housing activities to be done during the next year.
2. Report on the actions taken during the year that addressed the special needs of persons who are not homeless but require supportive housing, and assistance for persons who are homeless.
3. Evaluate the progress in meeting its specific objective of providing affordable housing, including a comparison of actual outputs and outcomes to proposed goals and progress made on the other planned actions indicated in the strategic and action plans. The evaluation can address any related program adjustments or future plans.
4. Report on annual HOPWA output goals for the number of households assisted during the year in: (1) short-term rent, mortgage and utility payments to avoid homelessness; (2) rental assistance programs; and (3) in housing facilities, such as community residences and SRO dwellings, where funds are used to develop and/or operate these facilities. Include any assessment of client outcomes for achieving housing stability, reduced risks of homelessness and improved access to care.
5. Report on the use of committed leveraging from other public and private resources that helped to address needs identified in the plan.
6. Provide an analysis of the extent to which HOPWA funds were distributed among different categories of housing needs consistent with the geographic distribution plans identified in its approved Consolidated Plan.
7. Describe any barriers (including non-regulatory) encountered, actions in response to barriers, and recommendations for program improvement.
8. Please describe the expected trends facing the community in meeting the needs

of persons living with HIV/AIDS and provide additional information regarding the administration of services to people with HIV/AIDS.

9. Please note any evaluations, studies or other assessments that will be conducted on the local HOPWA program during the next year.

Program Year 6 Action Plan HOPWA response:

N/A

Specific HOPWA Objectives

Describe how Federal, State, and local public and private sector resources that are reasonably expected to be available will be used to address identified needs for the period covered by the Action Plan.

Program Year 6 Specific HOPWA Objectives response:

N/A

Other Narrative

Include any Action Plan information that was not covered by a narrative in any other section.