

FY2025-2029 5-Year Consolidated Plan Analysis of Impediments to Fair Housing Choice and FY 2025 Annual Action Plan

August 20th and 21st, 2024 September 3rd, 2024

Consolidated Planning Process

• **Every 5 years** the City must complete a Consolidated Plan to set priorities for the use of CDBG and HOME funds; The City is currently preparing its new plan for FY 2025-2029.

• **Every year** the City will prepare an Action Plan to describe to the public (and HUD) how it intends to spend its annual allocation. The Five Year Plan will also include the first year plan of the five-year cycle.

What is an AI/CP/AAP?

- Analysis of Impediments to Fair Housing Choice (AI): identifies barriers that restrict housing choice for members of protected classes and recommendations to resolve the barriers
- Consolidated Plan (CP): describe community development priorities and goals over the next five years based on assessment of affordable housing and community development needs, market conditions and available resources
- Annual Action Plan (AAP): describes how the City will use its federal funds to address identified needs in 2025.

COMMUNITY DEVELOPMENT BLOCK GRANT (CDBG) PROGRAM BASICS

CDBG 101

- ✓ Administered by the US Department of Housing and Urban Development (HUD).
- ✓ Cities, states and some counties are eligible to receive CDBG funds annually from HUD.

CDBG OVERARCHING GOALS

- ✓ Provide decent, safe and sanitary housing.
- ✓ Provide a suitable living environment.
- ✓ Expand economic opportunities.

ACTIVITIES MUST MEET A CDBG NATIONAL OBJECTIVE...

- 1. Provide benefits to low- and moderate-income persons
- 2. Prevent or eliminate slum and blight
- 3. Meet an urgent need that threatens the health and welfare of residents

CDBG PROGRAM ELIGIBILITY vs INELIGIBILITY... WHO IS ELIGIBLE FOR FUNDING?

- 1. Private non-profits that are corporations, associations, agencies or with non-profit status under the Internal Revenue Code 501 c3
- 2. City Departments

WHAT ARE SOME ELIGIBLE ACTIVITIES?

- Housing Rehabilitation
- Public Facilities/Improvements
- Public Services
- Demolition
- Acquisition
- Program Administration

WHAT ARE SOME **INELIGIBLE** COSTS?

- Fundraising.
- Political Activities.
- Expenses required to carry out regular responsibilities or functions of local government.
- Income Payments.
- Building or portion thereof, used for general conduct of government.
- Purchase of equipment, fixtures, motors, vehicles, furnishings or other personal property.

^{*} These are some examples; this is not representative of all ineligible costs.

QUALIFYING AN ELIGIBLE ACTIVITY

- Serve low- to moderate-income households and individuals (at least 70% of funds)
- 2. Address slum and blight (no more than 30% of funds)

Low-Moderate Income is qualified in three ways:

- ✓ Area benefit: Service area for a public improvement or facility.
- ✓ Income intake: Programs that serve primarily low-and moderate-income individuals and families will be eligible for funding. The definition of a moderate-income family is no more than 80% percent of the area median income, adjusted for household size.
- ✓ Presumed benefit: Some groups are assumed to be low – moderate income. These include – abused children, battered spouses, elderly persons, disabled persons, homeless persons, illiterate adults, migrant farm workers, and persons living with AIDS.

HOME INVESTMENT PARTNERSHIPS PROGRAM (HOME) PROGRAM BASICS

HOME INVESTMENT PARTNERSHI P PROGRAM

HOME Investment Partnership Program funding is to help provide safe and decent housing for LMI households.

Eligible Activities include:

- Rental Housing
- Owner-Occupied Housing
- Homebuyer Assistance
- Rehabilitation
- New Construction
- Tenant Based Rental Assistance (TBRA)

HOME Program for Community Housing Development Organizations

A minimum of 15% of each year's HOME allocation must be used for a Community Housing Development Organization Project.

A Certified CHDO is:

- Community-based, non-profit organization
- Focused on increasing affordable housing
- Board composed with community residents

ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING (AI) BASICS

Analysis Of Impediments To Fair Housing (AI) Basics

- HUD recommends communities update Al every five years
- Identifies barriers that restrict housing choice for members of protected classes
- Use demographic and housing data to determine impediments that are limiting fair housing choice in a jurisdiction.
- Also use input from stakeholder participation to identify potential impediments for fair housing.
- Development of a Fair Housing Action Plan that proposes specific actions to address identified impediments to fair housing

The Federal Fair Housing Act

The federal Fair Housing Act protects people from discrimination when they are renting or buying a home, getting a mortgage, seeking housing assistance, or engaging in other housing-related activities.

Who is protected?

- Race
- Color
- National Origin
- Religion
- Sex (including gender identity and sexual orientation)
- Familial Status
- Disability

CP, AAP, and AI Tentative Schedule

DATE	ACTIVITY
August 20 – Sept 3, 2024	Stakeholder Consultation and Public Meetings
November 15, 2024	Draft CP/AI Plan Completed for Review
March 15, 2025	Draft AAP Completed
April 1 – May 1, 2025	Public Comment Period
April 2025	Public Hearing #2
Early May 2025	Council Approval/Resolution of CP/AI/AAP
On or about May 9, 2025	HUD submission
Program Year Start	July 1, 2025

Dates for plans submission to HUD are subject to change based on future guidance from HUD and final federal 2025 Budget/Program Allocations. All public meetings and Council approval dates for the plans will be duly advertised.

- 1. What barriers do you or others in your community face when trying to access affordable housing?
- 2. How do current city policies and programs impact your ability to find safe and affordable housing?
- 3. In your experience, are there neighborhoods or areas in the city where affordable housing is more difficult to find? If so, what factors contribute to this issue?
- 4. What types of housing assistance or programs could help to ensure fair access to affordable housing?
- 5. Are there any specific groups in the community who face greater challenges in finding affordable housing or experiencing more housing discrimination? What can the city do to address these challenges?

QUESTIONS TO CONSIDER

SURVEY

Share our online survey with colleagues, clients, neighbors and friends!

surveymonkey.com/r/Bloomington2024

The survey is also available in Spanish at this link.

QUESTIONS?

Email needs or questions to:

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Or mail to:

City of Bloomington

HAND Department

ATTN: CDBG

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