



Fourth Program Year Action Plan

The CPMP fourth 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

Program Year 4 Action Plan Executive Summary:

A. Purpose of Annual Plan

The Municipality of Norristown has prepared the Year 4 Action Plan as required under 24 CFR 91.220. The Action Plan for PY2013 identifies the activities to be funded with the Municipality's Community Development Block Grant (CDBG) (\$758,731.00) that it will receive during the program year.

B. Citizen Participation

The Municipality of Norristown engaged in a comprehensive consultation process with local public agencies and non-profit organizations in an effort to develop a community-driven Comprehensive Plan (CP). On September 1, 2012, the Municipality planning department staff conducted a public needs hearing to identify current issues and trends impacting the agencies and organizations as well as their organizational priorities in today's recession.

To encourage public input, Norristown conducted another Public Hearing on September 7, 2012 at 6:30 p.m. in the Council Chambers of the Norristown Municipal Hall. The hearing was scheduled in accordance with the Municipality's approved Citizen Participation Plan. A public notice for the hearing was published in the Norristown *Times Herald*. Notices were also posted on the Municipality's website.

Another Public Hearing was advertised on October 12, 2012 with a summary of proposed projects for funding, and a hearing to be held on Monday October 29, 2012 at 6:00 p.m. for public input to the proposed 2013 Action Plan.

A summary of the proposed Action Plan was also posted on the Municipality's website, www.norristown.org. The Action Plan was made available at the following locations from December 8, 2012 through January 9, 2013:

- Norristown Municipal Hall
235 East Airy Street
Norristown, PA 19401

- Montgomery County-Norristown Public Library
1001 Powell Street
Norristown, PA 19401

As part of these public hearings, the Municipality also held hearings as part of the Municipal Council meeting, with a draft plan being presented to Council for discussion on November 20, 2012, and the proposed Action Plan Budget presented to Council for review on Tuesday December 4, 2012, and voted upon on Tuesday December 18, 2012.

The Municipality received no comments on the draft Five-Year Consolidated Plan and One Year 2012 Action Plan at the September 7th Public Needs Hearing or following the date of the October 29th Public Hearing.

C. Priorities

The Municipality of Norristown expects to focus its CDBG entitlement funds towards improving the quality of life in Municipality's neighborhoods for extremely low, very low, and low income households, and to preserve and increase the stock of affordable owner and renter housing units. CDBG activities have been separated into broad categories addressing priority needs identified in the Municipality's FY2010-2014 Consolidated Plan, and 2013 One Year Action Plan.

Priority One: Improve the economic base of the community so that Norristown will become economically self-sufficient to an extent that will allow the local government to provide an adequate level of services to all its residents.

Priority Two: Upgrade the housing stock for residents of all income levels in order that every resident will occupy safe, healthy, and decent living quarters.

Priority Three: Enhance neighborhood values by keeping them physically sound and visually attractive, and by providing recreational facilities and other amenities that will have a positive effect on the quality of life. And also eliminate conditions detrimental to the public's health safety and welfare.

A more thorough analysis of needs for individual components is provided below:

Priority Housing Needs

- *Increasing homeownership.* This is Norristown's most significant current need, as homeownership rates have declined in recent years. From 1990 to 2000, Census figures indicate that the percentage of owner-occupied housing units declined from 55.1% to 48.1%. Recent estimates show the percentage of owner-occupied housing in Norristown rising to 50.1% by 2008, although these calculations may not consider the full impact of the housing crisis, and the associated high rates of foreclosure. Projections indicate that homeownership rates will fall back under 50% (49.7%) by 2013.
- *Rehabilitating housing owned by low-income households.* An estimated 50% of the substandard units suitable for rehabilitation are occupied by extremely

low income, very low income or low income households. Norristown is fully developed, with little or no land available for new affordable residential construction. In order to preserve Norristown's affordable housing stock, the Municipality will continue to rehabilitate and avoid demolition of standard and substandard units suitable for rehabilitation. Norristown will also increase its affordable housing stock by rehabilitating vacant units suitable for rehabilitation and selling to low to moderate income families.

- *Rehabilitation of rental housing.* Norristown is committed to stepping up code enforcement efforts on rental properties. At the same time, the Municipality will continue to support deconcentration of protected classes by encouraging other agencies, such as Montgomery County Housing Services, to continue efforts to fund the rehabilitation of existing rental properties outside of Norristown.

Homeless Needs and Strategies

The priorities for ending homelessness are based on the recognition that homelessness results from more than simply a lack of affordable housing, although providing housing is the ultimate objective. The Municipality participates in the Montgomery County Continuum of Care – which includes Montgomery County, Lower Merion, Norristown, and Abington – and its efforts to implement a Ten-Year Plan to End Chronic Homelessness. This plan reflects the best practice models from other cities that have successfully implemented housing first strategies for reducing chronic homelessness. The plan envisions a system in which public and private agencies work together as a consortium to procure and manage housing, provide central intake services, and deliver support services to clients through a coordinated case management system.

Priority Homeless Needs

The Montgomery County Continuum of Care has identified the following strategies for addressing homeless needs throughout its service area and in Norristown:

- *Increase the percentage of homeless persons moving from transitional to permanent housing to at least 63.5%* - concurrent with progress towards this goal, the Municipality supports the deconcentration of homeless resources from Norristown
- *Increase percentage of homeless persons staying in permanent housing over 6 months to at least 71.5%*
- *Increase the percentage of homeless persons employed at exit to at least 19%* - this goal currently is not a high need for the Municipality
- *Decrease the number of homeless households with children*
- *Create new permanent housing beds for chronically homeless persons* – following its efforts toward deconcentration, the Municipality supports development of these facilities outside of Norristown.

Outcome Performance Measures

HUD has developed an outcomes performance measurement system to collect information on outcomes of activities and to aggregate that information at the local and national level. Below is a list of the Municipality of Norristown’s proposed 2013 projects as matched with their HUD approved performance measures.

PERFORMANCE MEASURES FY 2012

RECEIPIENT	PROJECT	OUTCOME MEASURE	OBJECTIVE	OUTPUT
HOUSING				
Owner Occupied	Housing Rehab(CDBG)	Sustainability/Accessibility	Create suitable living environment	4 housing units
Owners/Renters	Code Enforcement	Sustainability/Accessibility	Create suitable living environment	5000 People
Owners	First Time Buyers	Availability	Create suitable living environment	6 housing units
MUNICIPAL PROJECTS				
Main Street	Economic Development Initiative	Availability	Create economic opportunity	2 Jobs
Neighborhood	Simmons Park	Availability/Accessibility	Create a suitable living environment	2637 People
Norristown Fire Department	Fire Engine Truck	Availability/Accessibility	Create a suitable living environment	1200 households
PLANNING & ADMINISTRATION				
Widener University	Small Business Assistance Center	Availability	Creating Economic Opportunities	1 Job
Norristown Planning Department	Administration	N/A		N/A
Housing Consultant	Rehab Tech Support	N/A		N/A

Community Development Needs and Strategies

The Municipality’s economic base has been eroded and much of the Municipality’s infrastructure was constructed prior to 1950, most of which is antiquated and continues to deteriorate. Norristown is in constant competition with its surrounding more affluent, newer suburban neighbors. The Municipality’s demographic landscape has also changed substantially, including a rapid growth in Hispanic residents. The Municipality will continue its efforts to develop the community by augmenting small business activity and working to avert major population decline.

E. Evaluation of Past Performance

The Municipality of Norristown’s past performance in the administration and implementation of the CDBG and HOME programs has fulfilled the spirit and intent of the federal legislation creating these programs. The Municipality has provided affordability for decent housing, availability and accessibility to a suitable living environment, sustainability of a suitable living environment, and accessibility to economic opportunities. The following is a summary of the Municipality’s past performance as reported to HUD in the PY2011 Consolidated Annual Performance and Evaluation Report (CAPER), the most recent report filed.

During PY 2011, Norristown received \$911,379 in CDBG funds and during the same program year, spent a total of \$969,367 in CDBG funds. The Municipality has consistently met the timeliness goals set by HUD of not having more than 1.5 times the amount of its allocation in its line of credit. This goal is also expected to be met in 2012, and by the writing of this Action Plan, the Municipality has a ratio of 1.3. Funds were spent on a variety of activities including the following:

DESCRIPTION		OUTCOME	OBJECTIVE	FUNDING AMOUNT
Owner Occupied Housing Rehab		Sustainability	Decent Housing	\$149,998.47
Housing Rehab Technical Support		Sustainability	Decent Housing	\$23,643
DESCRIPTION		OUTCOME	OBJECTIVE	FUNDING AMOUNT
Sidewalk Replacement Project		Accessibility/Availability	Create suitable living environment	\$3,759.25
Poley Park		Accessibility/Availability	Create suitable living environment	\$89,180.18
Riverfront Park		Accessibility/Availability	Create suitable living environment	\$20,863.37
Simmons Park		Accessibility/Availability	Create suitable living environment	\$208,825.57
Dekalb St. Avenue of the Arts		Sustainability	Create suitable living environment	\$6,983.25
Code Enforcement		Sustainability	Create suitable living environment	\$196,503.79
Fair Housing		Availability/Accessibility	Decent Housing	\$17,853.43
Montgomery County Cultural Center		Sustainability	Economic opportunity	\$4,480
Opportunities Industrialization		Sustainability	Create economic	\$33,143.80

Center			Opportunities	
Small Business Dev. & Outreach Center		Sustainability	Create economic opportunities	\$35,093.65
Administration		N/A	N/A	\$183,519.24

In 2009, the Municipality also received a HOME program grant of \$500,000 through the Pennsylvania Department of Community and Economic Development. These funds were for the purpose of owner occupied housing rehabilitation. Funds were expended during PY 2012. In addition, there was a HOME CHDO allocation in 2008 in the amount of \$550,000 for acquisition, rehabilitation and resale to first time homebuyers in Norristown.

- Through the Owner-Occupied Housing Rehabilitation Program, the Municipality expended \$ 92,385.01 in 2012 in which 4 properties benefited from the funding.
- CHDO HOME funds were expended in 2012 and to date \$214,752.62 has been expended with two (2) properties being renovated.

The Municipality of Norristown was also the recipient of \$62,233 in 2010 and \$46,183 in 2011, and \$37,691 in 2012 through Justice Assistance Grants awarded by the Department of Justice. Additionally in 2009 the Municipality received \$312,257 through Recovery JAG funds. These funds were utilized for purchasing police equipment and hiring part-time officers to support existing anti-crime initiatives. This equipment was utilized in Bee-Sting Operations throughout Norristown, which focused on reducing all types of crime in the Municipality.

In 2011, all CDBG funds expended for activities met one of the national objectives as defined under the CDBG regulations. CDBG-funded activity expenditures totaled \$961,483.49, with 79% benefiting low- and moderate-income persons.

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 4 Action Plan General Questions response:

1. Description of the Geographic Area

Priority CDBG funding areas in Norristown include areas where there is a majority of low and moderate income (LMI) persons. The following narrative describes the characteristics of these areas.

According to U.S. Census data, the population of Norristown has remained relatively steady since 1990, with the Municipality gaining only several hundred individuals over the last two decades. The population in Norristown in 2008 was estimated at 30,988 individuals. Population estimates for 2013, however, indicate that the population will decrease slightly to 30,226 residents. According to population estimates for 2008 and projections for 2013, Norristown and Montgomery County are in the midst of a demographic shift that is characteristic of overall trends in Pennsylvania and the United States. The proportion of minorities in both jurisdictions has increased since 2000. The Municipality will see a gradual decline in the White population as it begins to be replaced by a higher minority presence. The proportion of minorities in 1990 represented 29.3% of the population in Norristown. By 2013, it will consist of more than half the population, 51.5%. Similar trends are evident at the county and state levels, although not to the same extent.

Between 1990 and 2000, the racial minority share of Norristown's population rose from 29.3% to 45.7%, an increase of 5,235, or 16.4%. Most of the increase was in the Black and Hispanic population. After 2000, changes in the population aren't as pronounced; however, the Hispanic and Asian/Pacific Islander groups continued growing by consistent amounts. Between 2000 and 2008, the percentage of minorities in Norristown increased 2.9%. Between 2008 and 2013, projections indicate that the Municipality's racial and ethnic trends will continue, particularly the declining White population and increasing Hispanic population. Details appear in the table below.

Persons of Hispanic origin may give their race as White, Black or other minority. Between 1990 and 2000, the Hispanics population increased 7.8% from 830, representing 2.7% of the total population, to 3,282, representing 10.5% of the total population. By 2008, the Hispanic population increased to 5,526, representing 17.8% of the total population. Projections indicate that Norristown will have 6,731 Hispanics, representing 22.3% of the total population, by 2013.

The Municipality of Norristown

Population by Race and Hispanic Origin, 1990 - 2008

	Total Population	White		Minority							Hispanic Origin	
		Total	% of Population	Total Minority	Black	% of Blacks	Am. Ind. Eskimo	Asian, Pacific Islander	Other	Two or More Races	Total	% of Hispanics
1990												
Norristown	30,939	21,886	70.7%	9,054	8,207	26.5%	50	511	286	*	830	2.7%
Montgomery Co.	678,109	620,087	91.4%	57,989	39,121	5.8%	746	15,973	2,149	*	8,352	1.2%
Pennsylvania	11,881,633	10,520,211	88.5%	1,361,266	1,089,778	9.2%	14,716	137,311	119,461	*	232,264	2.0%
2000												
Norristown	31,274	16,985	54.3%	14,289	10,884	34.8%	63	938	1,443	961	3,282	10.5%
Montgomery Co.	750,097	648,510	86.5%	101,587	55,969	7.5%	848	30,446	5,598	8,726	15,300	2.0%
Pennsylvania	12,281,054	10,484,203	85.4%	1,796,851	1,224,612	10.0%	18,348	223,230	188,437	142,224	394,088	3.2%
2008												
Norristown	30,988	15,918	51.4%	15,070	11,157	36.0%	121	1,305	1,490	997	5,526	17.8%
Montgomery Co.	776,119	640,378	82.5%	135,741	71,019	9.2%	1,987	44,560	6,759	11,416	26,435	3.4%
Pennsylvania	12,417,218	10,362,720	83.5%	2,054,498	1,288,088	10.4%	15,488	310,004	228,409	212,509	608,760	4.9%
2013												
Norristown	30,226	14,660	48.5%	15,567	11,254	37.2%	132	1,379	1,780	1,022	6,731	22.3%
Montgomery Co.	775,265	616,748	79.6%	158,517	88,917	11.5%	2,490	50,475	7,234	9,401	32,731	4.2%
Pennsylvania	12,378,770	10,254,568	82.8%	2,124,202	1,285,563	10.4%	12,479	335,008	264,144	227,008	744,790	6.0%

Source: DemographicsNow

* Not reported in 1990

Concentrations of Minority and Hispanic Persons

The following table presents population by race and Hispanic origin. The data is presented by census tract for 31,284 residents in Norristown in 2000. HUD defines areas of racial or ethnic concentration as geographical areas where the percentage of minorities or ethnic persons is at least 10 percentage points higher than in the Municipality overall.

In Norristown, minority persons comprised 45.7% of the population. Therefore, an area of racial concentration includes census tracts where the percentage of minority residents is 55.7% or higher. There were 3 census tracts in Norristown that met the criteria for areas of racial concentration. These areas include:

- Census tract 2036.01 – 62.7%
- Census tract 2039.01 – 60.0%
- Census tract 2039.02 – 40.7%

In addition, persons of Hispanic origin represented 10.5% of the population in Norristown. Therefore, an area of ethnic concentration includes the census tracts where the percentage of Hispanics is 20.5% or higher. Only one of the Municipality's census tracts met this definition. This area was:

- Census tract 2039.01 – 23%

Population by Race and Hispanic Origin, 2000

Census Tract	Total	White	Minority							Hispanic Origin	
			Black	% of Blacks	Am. Ind. Eskimo	Asian	% of Asians	Other	Two or More	Total	% of Total
All Tracts	31,284	16,992	10,887	34.8%	63	928	3.0%	1,443	961	3,282	10.5%
2035.00	5,971	3,427	2,006	33.6%	12	249	4.2%	149	128	365	6.1%
2036.01	2,767	735	1,736	62.7%	4	44	1.6%	156	90	323	11.7%
2036.02	3,792	2,537	984	25.9%	3	62	1.6%	80	125	169	4.5%
2037.00	1,532	1,098	372	24.3%	2	20	1.3%	15	25	67	4.4%
2038.01	3,409	2,523	551	16.2%	2	103	3.0%	93	137	301	8.8%
2038.03	4,977	2,987	1,309	26.3%	7	196	3.9%	312	164	614	12.3%
2038.04	2,950	1,734	935	31.7%	15	58	2.0%	116	88	316	10.7%
2039.01	3,101	731	1,861	60.0%	14	41	1.3%	346	108	712	23.0%
2039.02	2,785	1,220	1,133	40.7%	4	155	5.6%	176	96	415	14.9%

Note: Shading indicates a tract that meets the definition of a racial or ethnic concentration.

Source: U.S. Census Bureau, Census 2000, Summary File 1 (P3, P4)

Low & Moderate Income Areas

The following table presents information regarding low and moderate income (LMI) individuals in Norristown. LMI persons, as determined by HUD, have incomes at or below 80% of the median family income (MFI). In its 2007 estimates, HUD determined that there were 17,453 LMI persons in the Municipality, equivalent to 57.6% of the population. Although data was not available for Norristown, HUD reported that the FY2007 MFI in Montgomery County was \$71,600.

HUD defines an LMI census tract as one in which 51% or more of the population have incomes of 80% or less of MFI. According to these criteria, five of the Municipality's nine census tracts qualify as LMI areas. Details on the LMI status of each tract appear in the following table.

Low & Moderate Income Persons by Census Tract, 2007

Census Tract	Low & Moderate Income Persons	
	Persons	Percent
All Tracts	17,453	57.6%
2035.00	2,763	47.3%
2036.01	1,819	66.1%
2036.02	1,802	49.1%
2037.00	451	49.9%
2038.01	1,743	26.1%
2038.03	2,873	57.9%
2038.04	1,805	62.2%
2039.01	2,241	73.6%
2039.02	1,956	69.5%

Note: Shading indicates low-income census tracts.

Source: U.S. Housing and Urban Development

Concentrations of LMI Persons, Minority Persons and Hispanics

Of the five tracts identified as LMI areas, three were noted also to be areas of racial and/or ethnic concentrations. These areas are noted in the following table.

LMI Areas of Racial and/or Ethnic Concentration

Census Tract	Neighborhood	% LMI	% Black	% Hispanic
2036.01		66.1%	62.7%	11.7%
2039.01		73.6%	60.0%	23.0%
2039.02		69.5%	40.7%	14.9%

Source: U.S. Census Bureau, HUD

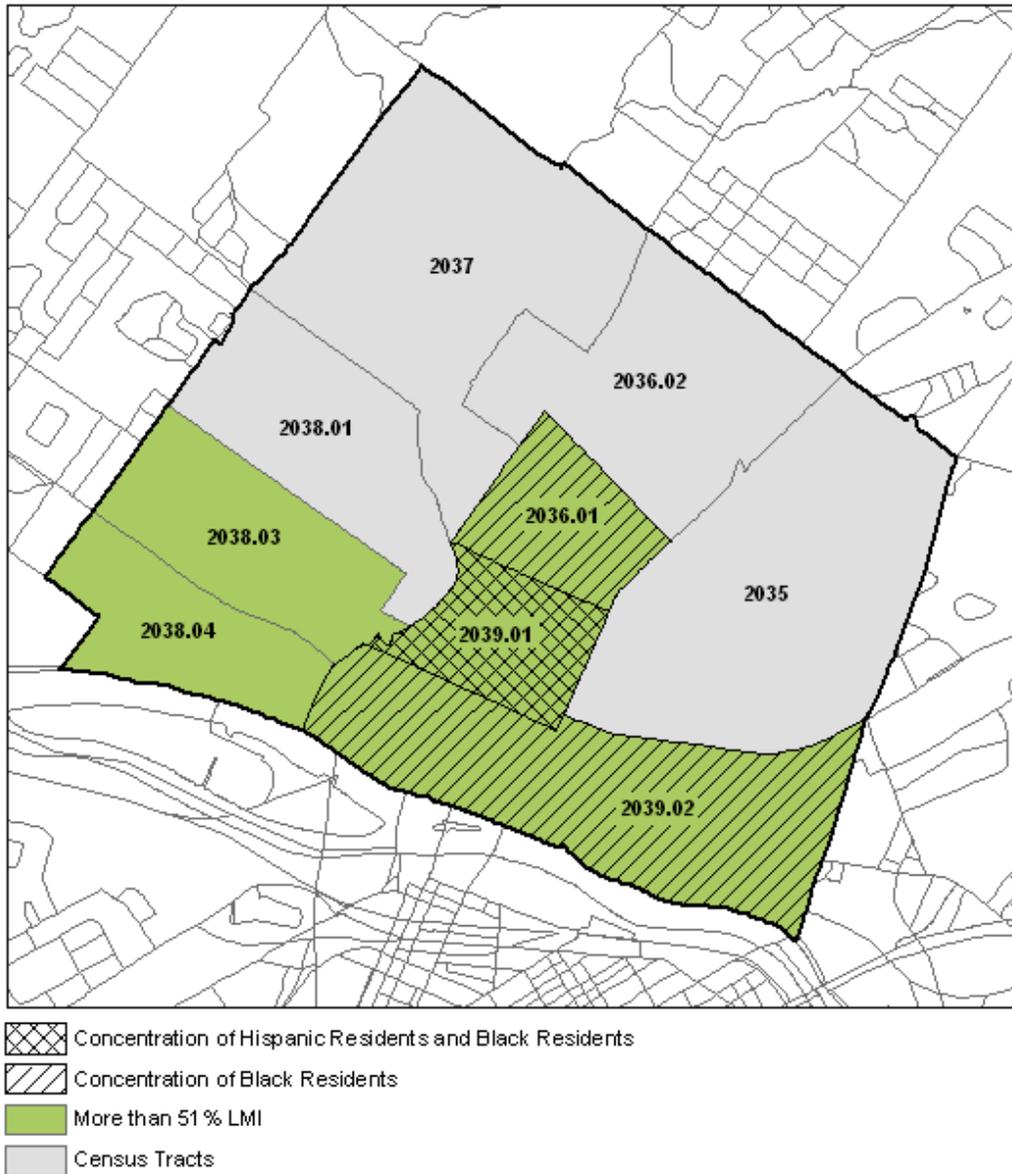
Federal CDBG funds are intended to provide low and moderate income households with viable communities, including decent housing, a suitable living environment and expanded economic opportunities. Eligible activities include community facilities and improvements, housing rehabilitation and preservation, affordable housing development activities, public services, economic development, planning, and administration.

The system for establishing the priority for the selection of these projects is predicated upon the following criteria:

- Meeting the statutory requirements of the CDBG program
- Meeting the needs of LMI residents
- Focusing on low and moderate income areas or neighborhoods
- Coordination and leveraging of resources
- Response to expressed needs
- Sustainability and/or long-term impact, and
- The ability to demonstrate measurable progress and success.

Much of the Municipality’s funds are invested in one of the LMI areas in Norristown. These census tracts are 2036.01, 2038.03, 2038.04, 2039.01, and 2039.02. These LMI tracts, as well as census tracts of racial or ethnic concentration, are shown on the map.

Racial, Ethnic and LMI Concentration by Census Tract, 2000



3. Obstacles to Meeting Underserved Needs

The primary obstacle to meeting underserved needs is the limited resources available to address identified priorities. The Municipality of Norristown partners with other public agencies and non-profit organizations, when feasible, to leverage resources and maximize outcomes in housing and community development.

4. Funds Expected to be Available

Currently, the Municipality of Norristown receives CDBG funds from HUD. These funding sources will be available to help support new and existing community development projects and Housing preservation through the owner-occupied housing

rehabilitation program. The Municipality's annual allocation from the entitlement grant is as follows:

CDBG \$758,731

The Municipality does not anticipate any CDBG program income during the program year. However, the Municipality expects to receive \$500,000 in state-allocated HOME funds during the program year from the Pennsylvania Department of Community and Economic Development to leverage our housing rehabilitation program.

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 4 Action Plan Managing the Process response:

1. Lead Agency

The lead agency for the Consolidated Plan is the Municipality of Norristown's Department of Planning and Municipal Development, which also administers the CDBG and HOME programs. In addition, the Montgomery County Housing Authority (MCHA) will play a larger role in providing and managing housing programs not covered by this plan. The Montgomery County Redevelopment Authority will be an important stakeholder in community development projects and improvements. Coordination with various non-profit organizations, such as Community Action Development Commission (CADCOM), Opportunities Industrialization Center (OIC), and the Montgomery County Housing Coalition the lead entity for the Montgomery County Continuum of Care process, will also be important.

2. Significant Aspects of the Process

In July 2009, the Municipality engaged the services of Mullin & Lonergan Associates, Inc. to serve as consultant to the Developing of the Five Year Consolidated Action Plan for 2010 to 2014.

The Municipality made the decision to encourage a high level of agency consultation in an effort to demonstrate its commitment to identifying priority needs and engaging the participation of public agencies and non-profit organizations in a positive and collaborative manner. A list of stakeholders and affordable housing providers was developed and included public agencies and private non-profit organizations whose missions included the provision of affordable housing and human services to LMI households and persons. These stakeholders were invited to

participate in completing specific provider-type surveys held for the purpose of developing the CP.

The CP was developed using reliable data from sources such as the U.S. Census Bureau, HUD's State of the Cities Data System (CHAS data tables), the National Low Income Housing Coalition, the local real estate multi-list service database, municipal departments and several planning documents produced by or on behalf of Norristown. These include the original Norristown Economic Revitalization Strategy first adopted in 2000 and updated in 2009, the 2005-2009 Consolidated Plan, recent CAPER reports and the recently updated 2009 Comprehensive Plan, among other plans.

Additionally, public and private agencies which were identified as stakeholders in the process were asked to complete written questionnaires to provide data on special needs populations such as the elderly, youth, persons with HIV/AIDS, public housing residents, persons with disabilities, and the homeless. Copies of the written questionnaires sent to the various entities were included in the Five Year Consolidated Plan submission.

Based on the public hearings and stakeholder questionnaires, a set of priorities was established by the Municipality for the next five years. The Municipality just completed the second year of the five year plan and this submittal represents the 3rd Year of the Five Year Consolidated Plan Process.

While following the Citizens Participation Plan, an informal session was held on September 1, 2012 followed by the required Public Needs Hearing which was held on September 7, 2012 and October 29, 2012 including subsequent Council meetings in Council Chambers, Norristown Municipal Hall, 235 East Airy Street, Norristown, PA. No comments have been received. Minutes of the hearing are kept on file in the Department of Planning and Municipal Development and the Municipal Administration office.

A draft of the Consolidated Plan for 2010-2014 and the Annual Plan for FY2011 was placed on public display for 30 days beginning December 8, 2012 and ending January 9, 2013.

3. Actions to Enhance Coordination

The Municipality of Norristown engaged in public processes all year long through town Meetings in the different Council districts, working with local housing providers and non-profit organizations in an effort to develop a community-driven Plan. These organizations include, but are not limited to:

➤ **Public Agencies**

- Montgomery County Redevelopment Authority
- Montgomery County Housing Authority
- Montgomery County Economic and workforce Development
- Montgomery County Housing Coalition
- Montgomery County Continuum of Care
- Montgomery County Housing and Community Development

➤ **Non-profit Organizations**

- Genesis Housing

- Habitat for Humanity
- Coordinated Homeless Outreach Center
- Fair housing Rights
- Opportunities Industrialization Center
- Montgomery County Cultural Center
- CADCOM
- Hedwig House
- Salvation Army
- ACLAMO

Collaboration and coordination with these entities will continue throughout the year in order to capitalize on potential future funding that may be received by the Municipality in 2013. Coordinated actions include programmatic linkages between agencies as well as budget allocation process coordination. In this way, the Municipality will be positioned to take advantage of potential partnership opportunities that would result in increased investment to benefit low and moderate income households and persons.

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 4 Action Plan Citizen Participation response:

1. Summary of Citizen Participation Process

The Municipality of Norristown has followed the same procedures in advertising the amount of assistance expected to be received and the range of activities to be undertaken during the fiscal year in question, including the estimated benefits for low and moderate income populations.

The Municipality will make copies of the Proposed Action Plan available for public review and comment for 30 days. The 2013 Proposed Action Plan will also be posted on the Municipality's website, www.norristown.org. The Proposed Action Plan will be available at the following locations, in accordance with Norristown's Citizen Participation Plan:

- Norristown Municipal Hall:
235 East Airy Street
Norristown, PA 19401

- Montgomery County-Norristown Public Library
1001 Powell Street
Norristown, PA 19401

The Municipal citizen review process for the final annual action plan allows for two public hearings each year, in addition to two regularly scheduled Municipal Council meetings, which are open to the public and televised on a local public television network. Once the proposed CDBG budgets have been finalized and presented to the Municipal Council for a final vote, an ordinance is passed that also represents a cementing of the local citizen participation process. Any public comments – verbal, written or e-mailed to the Municipality – are incorporated into the plan’s final edition.

The required Public Needs Hearing was held on September 7, 2012 from 6:30 to 7:30 pm at Council Chambers, Norristown Municipal Hall, 235 East Airy Street, Norristown, PA. The hearing was scheduled in accordance with the Municipality’s Citizen Participation Plan. A public notice for the hearing was published in *The Times Herald*, a copy of which is included in Additional Information – Appendix A. Notices also were posted in the Montgomery County-Norristown Public Library, as well as on the Municipality’s website, www.norristown.org.

2. Summary of Citizen Comments

The Municipality received no public comments at the September 7, 2012 Public Needs Hearing. Another public hearing was to be held on Monday, October 29, 2012 at 6:00 p.m. (canceled due to Hurricane Sandy) with proposed projects and activities for funding, in accordance with the Citizen Participation Plan. No public comments were received at the time.

3. Summary of Efforts Made to Broaden Public Participation

The Municipality has an open-ended policy of allowing for citizen input all year round. This input process also includes meetings with local community groups, particularly those which represent minority and non-English speaking persons, such as Accion Communal Latino Americana De Montgomery (ACLAMO). The Municipality also works with Montgomery County Housing Authority, the Montgomery County Housing Coalition as well as private housing advocacy groups, to encourage the participation of all the low to moderate income residents. The Department of Planning and Municipal Development has an application package that is available to applicants for Community Development Block Grant funding.

4. Explanation of Comments Not Accepted

No public comments have been received to date on the Action Plan.

Institutional Structure

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

Program Year 4 Action Plan Institutional Structure response:

1. Institutional Structure

Norristown's Department of Planning and Municipal Development will continue to oversee the Municipality's housing rehabilitation, reconstruction, and down payment assistance programs. The Municipality will work towards improved coordination with the Montgomery County Housing Authority on housing issues, particularly as they pertain to deconcentration of facilities and services into the surrounding areas of the County. The department will also continue to provide overall administration of the CDBG and state-funded HOME programs. Additionally, Municipal officials have partnered with other officials in the County that have similar concerns for their Townships, in an effort to come up with a unified approach to the shared housing issues and concerns especially as it relates to deconcentration.

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 4 Action Plan Monitoring response:

1. Monitoring of Activities

The Municipality of Norristown conducts monitoring reviews to determine whether its programs are being carried out in accordance with its Consolidated Plan in the following manner. The reviews are completed by the Department of Planning and Municipal Development, as this department is responsible for the administration of grant funds. The housing activities are carried out by an in-house consultant, making it easy to monitor progress and long-term compliance with program requirements.

Monitoring of Housing Programs

- The Department will continue to require and conduct a review of monthly reports submitted by the Housing Program consultant. The department will review and approve bills before payment on an ongoing basis.
- The Department will review and approve bills before payment on an ongoing basis.
- The Department will meet and discuss figures and goals of the program with the consultant on an ongoing basis.
- The Department will conduct an annual assessment of the program's progress.

Monitoring of Community Development Programs

- The Department will review and approve bills before payment on an ongoing basis.
- The Department will meet and discuss figures and goals of the programs with other Department Heads and Administration.
- The Department will conduct an annual assessment of the programs' progress.

The Department will also conduct annual reviews of the following programs

administered by other agencies: Montgomery County MH/MR and Aging and Adult Services, Montgomery County Community Action Development Commission (CADCOM), and Montgomery County Housing Authority Section 8 Certificate, Housing Choice Voucher, and Public Housing programs. Norristown will also continue to monitor the work of the Montgomery County Housing Authority.

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 4 Action Plan Lead-based Paint response:

1. Actions to Evaluate and Reduce Lead-Based Paint Hazards

Lead abatement activities in Norristown are managed by the Montgomery Department of Health Services, which performs blood lead-level tests on children and other at-risk persons. Lead poisoning is a common childhood condition, but it is also totally preventable by reducing and eliminating the lead source within a child's environment. Lead testing is available at the Norristown Health Center for Montgomery County children up until their 7th birthday. Case management services are provided to all Montgomery County residents who have a child that has been identified as having an elevated blood lead level. Case management services involve education and home visits by an environmental health specialist and a public health nurse. They work together to assist parents and homeowners in reducing and/or eliminating the source of lead exposure to the child. In 2011, there were 56 reported cases of children with elevated lead levels (lead levels of 10 mcg/dL or greater), in Norristown.

Norristown will continue to monitor the Department's lead abatement activities. Additionally, the Municipality will also continue to comply with the lead abatement requirements of its housing programs, including the first-time homebuyer program and the acquisition/rehabilitation resale program. In compliance with CDBG regulations, the Municipality performs a risk assessment on all housing rehabilitation projects to identify any lead paint hazards. Measures are in place address these hazards during rehabilitation. A Lead-Certified Inspector performs a clearance test prior to the closeout of the project for the Housing Rehabilitation Program. Additionally, Municipality staff members are trained in visual assessment certifications and perform visual tests for the First Time Homebuyers Program. In 2011, 100% of the properties that received CDBG funding had lead hazards.

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 4 Action Plan Specific Objectives response:

1. Specific Priorities and Objectives

The Municipality of Norristown expects to focus its CDBG entitlement funds towards improving the quality of life in Municipality neighborhoods for extremely low, very low, and low income households, and to preserve and increase the stock of affordable owner occupied units while ensuring concentrated code enforcement for the and renter housing units. With this in mind, the following objectives have been established:

- **Rehabilitation of Housing Owned by Low Income Households:** An estimated 50% of the substandard units suitable for rehabilitation are occupied by extremely low income, very low income or low income households. Norristown is fully developed, with little or no land available for new affordable residential construction. In order to preserve Norristown's affordable housing stock, Norristown will also increase its affordable housing stock by rehabilitating vacant units suitable for rehabilitation and selling to low to moderate income families.

Objective: Continue the municipal-wide Owner Occupied Housing Rehabilitation Program, which provides interest-free loans. The loans average \$30,000 and are forgiven after 10 years. Assist four homes.

Objective: Increase the Municipality's affordable housing stock by rehabilitating vacant units suitable for rehabilitation and selling to low to moderate income families. Assist with the rehabilitation of four owner-occupied homes through the CDBG Acquisition / Rehabilitation / Resale Program.

Objective: Aid in the prevention of slum and blight areas by increasing code enforcement and inspecting 5,000 unoccupied and occupied housing units for compliance with building codes within the Municipality's CDBG area.

- **Rehabilitation of Rental Housing:** Norristown is committed to stepping up code enforcement efforts on rental properties. At the same time, the Municipality will continue to encourage other agencies, such as Montgomery County Housing Services, to continue their efforts to fund the rehabilitation of existing rental properties, particularly in the surrounding areas of the County.

- **Increased Homeownership Opportunities:** Expand homeownership opportunities to very low and low income individuals and households. Norristown's most significant current need, as homeownership rates have declined in recent years. Projections indicate that homeownership rates will fall back under 50% (49.7%) by 2013.
- **Fair Housing Educational Activities:** Support efforts of the Fair Housing Council in its awareness campaigns

Objective: Target realtors and homeowners with warnings about prohibitions against block busting, workshops on fair housing, and advocacy for victims of housing discrimination. Serve 200 persons.

2. Resources Expected to be Available

Norristown anticipates receiving \$911,379 in CDBG funds in PY2012. The Municipality has also applied for additional HOME funds from the PA-DCED. These funding sources will be available to help support public improvements, the delivery of social services, affordable housing projects, housing rehabilitation programs, and homeless outreach and prevention activities.

(See HUD Activity Sheets in Additional Information – Appendix A.)

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 4 Action Plan Public Housing Strategy response:

1. Public Housing Activities

Housing Choice Voucher Program (formerly Section 8)

Montgomery County Housing Authority (MCHA) currently owns only one public housing unit located within Norristown. This unit was recently rehabilitated by the MCHA and is for sale to a low income family. A total of 36 units of public housing within Norristown have been rehabilitated and sold to low income homeowners as part of a municipal/housing authority partnership over the last several years.

The primary source of assistance to make rental housing affordable in Norristown is the federal Housing Choice Voucher Program (formerly Section 8), which is administered by MCHA. This program permits those receiving a voucher to rent a housing unit and pay a maximum of 30% of their income on the rent. The Housing Choice Voucher Program pays the remaining portion.

Beyond ensuring that residents have access to affordable housing through the Housing Choice Voucher program, Norristown is dedicated to increasing homeownership among low and moderate income households. In furtherance of this goal, the Municipality annually allocates \$150,000 of the CDBG funds to the Owner-Occupied Housing Rehabilitation Program. The Municipality has also allocated \$300,000 in HOME funds through the PA Department of Community and Economic Development, which will also fund this program.

2. The Montgomery County Housing Authority is not designated as a troubled agency by HUD.

Barriers to Affordable Housing

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

Program Year 4 Action Plan Barriers to Affordable Housing response:

1. Proposed Actions to Remove Barriers to Affordable Housing

There are relatively few barriers to affordable housing in Norristown. The Municipality has a large stock of affordable housing which has increased due to the recent economic downturn. Norristown has experienced a large influx of Housing Choice Voucher (formerly Section 8) residents, indicating that rents are affordable. These factors demonstrate that housing market conditions have not impeded the availability of affordable rental stock.

The primary impediment to the development of new affordable housing properties in Norristown is the built-out status of the Municipality, which translates to a lack of available land on which to build new units, especially multi-family structures. An increase in foreclosures and population decline have increased the number of vacant structures, and many older homes owned by low or moderate income families have fallen into substandard condition. These impacts are largely due to factors outside of the control of local government, though the Municipality has addressed them during the consolidated planning process and through increased concentrated code enforcement. The Municipality plans on addressing this impediment through its Acquisition/Rehabilitation/Resale Program.

Previous reports by and on the behalf of the Municipality have noted trends of panic selling and blockbusting in Norristown, which have limited housing choice by increasing the degree of neighborhood residential racial/ethnic segregation. While this has the potential effect of lowering the market price of property, thereby increasing its affordability, it severely limits the extent to which the Municipality can offer a fair housing environment. The Municipality's fair housing strategy is to be further detailed in its 2012 Analysis of Impediments to Fair Housing currently underway.

Other impediments to fair housing exist within the Municipality. Some Norristown owners carry high-cost loans as a result of predatory lending practices in the community. Unnecessarily expensive loans increase the burden of housing cost on owners, making it more likely that homes will fall into disrepair or foreclosure. ADA accessibility is an issue due to the age of Norristown's housing stock, particularly

among older homes and multi-unit developments. Additionally, Norristown's growing Hispanic population faces several problems, including exorbitant rents for substandard housing, improper lease termination, and increasing rents for expenses such as water and sewer. Fear of deportation keeps many of these families and individuals from reporting violations to the Municipality.

To preserve the availability of affordable housing, the Municipality has focused on rehabilitating the housing stock available to low and moderate income households. The Owner-Occupied Housing Rehabilitation Program has been the most substantial of these efforts. The program has been the focus of several PA-DCED HOME grants (in the amount of \$500,000 or more) and a substantial amount of CDBG funds. The Municipality has also undertaken the Vacant Residential Acquisition Program, buying vacant properties and rehabilitating them itself or donating them to non-profits. Funds are directed towards this effort since rehabilitation on the private market would result in prohibitively expensive housing. In the past 26 years, the program has successfully rehabilitated between 400 and 450 properties, spending more than \$10,000,000 on acquisition, rehabilitation, resale, and construction. Depending on funding availability, between four and twenty-seven properties are rehabilitated per year.

In addition, Norristown has promoted homeownership through its First-Time Homebuyer Program, which is funded through CDBG and HOME funds allocated by the PA-DCED. The Municipality has partnered with several regional non-profits, including Genesis Housing Corporation, Habitat for Humanity, and Community Action Development Commission (CADCOM) to rehabilitate vacant and deteriorated housing, and provide services and funds for families and individuals seeking homeownership. In the past two decades, this program has enabled over 100 people to successfully become homeowners in Norristown, by receiving up to \$5,000 per person towards closing costs and down payment assistance.

The Municipality is an active and supportive partner to area non-profit housing developers and other organizations involved in the development of affordable housing. In addition to Norristown's willingness to work with area developers and non-profits, the Municipality has several multi-year programs and initiatives in place to address existing barriers to affordable housing that can be funded through the use of CDBG funds. The following is a list of these programs:

- **The Owner-Occupied Rehabilitation Program** – This program provides interest-free loans averaging \$30,000, forgivable after 10 years, to existing homeowners making no more than 80% of area median income to rehabilitate their homes. This program helps to restore the existing affordable housing stock and improve the quality of life conditions in Municipality neighborhoods.
- **Code Enforcement Efforts** – This program provides funds for the Municipality to inspect properties in target areas to bring them to building code and prevent the decline of deteriorated areas.
- **Participation in Fair Housing Council** – The Municipality is involved in an awareness campaign targeting realtors and homeowners with warnings about prohibitions against block busting, workshops on fair housing rights, and advocacy for victims of housing discrimination.

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 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 4 Action Plan HOME/ADDI response:

1. Other Forms of Investment

In PY2013, the Municipality does not anticipate receiving additional federal funds as a result of the American Recovery and Reinvestment Act of 2009 (known as ARRA).

However, the Municipality was allocated additional grant funds from the following agencies:

- **\$97,230** (to the Montgomery County COC Housing Coalition) from HUD in Homelessness Prevention and Rapid Re-Housing Program (HPRP) funds (out of a total of \$2,140,521 allocated to the Montgomery County COC); and anticipates
- **\$500,000** in state-allocated HOME funds through the PA Department of Community and Economic Development

Together, these grant funds have enabled the Municipality to invest nearly \$600,000 in addition to their CDBG grant awards in FY2011. These funds will, by their nature, assist LMI individuals in the Municipality of Norristown.

2. Recapture/Resale Provisions

For owner occupied rehabilitation activities, the Municipality applies a non-amortizing 10 year mortgage that is recaptured 100% if the owner sales the property before the 10 year time period. Funds recaptured are reprogrammed for use for rehabilitation of other low moderate income owner occupied properties in need of rehab. Additionally assistance to first time homebuyers involves a five year lien on the property which is recaptured fully if the owner sales the property prior to the lien expiration period.

3. Use of HOME Funds to Refinance Existing Debt (Multi-family Housing)

NOT APPLICABLE.

4. Use of ADDI Funds

NOT APPLICABLE. The Municipality of Norristown does not anticipate receiving an allocation of ADDI funds for PY2013.

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 4 Action Plan Special Needs response:

1. Source of Funds

In light of the limited amount of CDBG funds available to the Municipality of Norristown, homeless needs and homeless prevention are addressed through other revenue sources. Norristown will support efforts of human service agencies, social service providers, and other organizations that provide services and assistance to individuals and families who are at imminent risk of becoming homeless, in as far permanent housing is concerned, and in any efforts concerning deconcentration of these services from Norristown, to through-out the County. The Municipality of Norristown does not receive Emergency Shelter Grant (ESG) funds to assist with homeless needs.

However, there are several non-profit homeless service providers in Norristown that receive funds through the U.S. Department of Health and Human Services, McKinney-Vento Homeless Assistance Act funds and other sources. These funds are used to operate other emergency shelters, transitional housing facilities, and permanent supportive housing facilities throughout the Municipality of Norristown and Montgomery County. These funds are also used to provide supportive services such as case management services, counseling, job training, and life skills classes.

The list below summarizes the services offered and available funding in Norristown, for some of these services:

- Salvation Army – The Salvation Army of Greater Philadelphia is an organization that offers spiritual ministry, as well as various social services. Their 2009 Annual Report indicated that their total revenue was

\$28,610,314, with 49% coming from government funding, 16.5% from adult rehabilitation sales, and 16% from contributions and foundation grants.

- Laurel House – This organization is dedicated to the vision of ending domestic violence in each life, home, and community. Their mission is to provide safe haven for abused women and their children, to raise public awareness about domestic violence, and to advocate for social change against domestic violence. Their FY2008 total revenue stream was \$1,890,316, with 39.3% coming from government funding and another 24.9% coming from donations.

2. Homeless Needs

Specifically, the Strategic Plan focuses on outreach, data, housing, health care, finance, and supportive services. Some of the Municipality's objectives are summarized below, and are consistent with goals and objectives outlined in the 2009 Continuum of Care Plan.

- **Increase the percentage of homeless persons moving from transitional to permanent housing to at least 63.5%** - the Municipality's rehabilitation programs and services, as well as the Acquisition/Rehabilitation/Resale Program, should produce more affordable housing units for LMI households and individuals. The Municipality also continues to allocate funds towards First Time Homebuyers that go towards down payment or closing cost assistance. The Municipality also encourages deconcentration of homeless facilities and services so that these individuals have greater choices in housing type and location other than being concentrated in Norristown.
- **Increase the percentage of homeless persons employed at exit to at least 19%** - although this is not a specific focus of the Municipality, the opportunities developed by the Municipality's economic initiatives, such as the Studio Centre and Tax Increment Financing projects, should increase the number of accessible jobs available to individuals in Norristown.
- **Decreasing the number of homeless households with children** – by allocating money to organizations such as the Opportunities Industrialization Center, the Municipality's CDBG funds will support literacy, education, and job training services for households. These programs should assist families in procuring employment and affording rental housing units.

The main obstacle to completing the priorities listed above is a lack of funding from private and non-federal government sources. The recent economic downturn has reduced contributions to homeless service providers from the public. In addition, the economic downturn, and the accompanying decrease in taxes collected, has reduced the amount of municipal funds available for such activities.

3. Chronic Homelessness

HUD defines the term "chronically homeless" as unaccompanied individuals with disabilities who have been continually homeless for 12 months or more or who have had four episodes of homelessness in a three-year period. In Montgomery County, 160 people were identified as chronically homeless in 2004 and 74 were identified as

such in 2008. Of those 74, 62 were receiving shelter within the Montgomery County system and 12 were currently unsheltered.

During 2005, the Coordinated Homeless Outreach Center opened in Norristown, Montgomery County. Forty-one percent of those seen at the Center were considered chronically homeless according to the HUD definition. Sixty-three percent reported having a mental illness, 42% reported alcohol abuse, and 52% reported the use of other substances. In addition, 10% presented with severe medical or physical disabilities.

The January 2008 Point in Time Survey categorized the people interviewed into subpopulations as follows:

2008 Continuum of Care Point in Time Homeless Subpopulations

	<u>Sheltered</u>	<u>Unsheltered</u>	<u>Total</u>	<u>% Pop.</u>
Chronically Homeless	62	12	74	27%
Severely Mentally Ill	63	15	78	28%
Chronic Substance Abuse	50	7	57	21%
Veterans	10	1	11	4%
Persons with HIV/AIDS	0	0	0	0%
Victims of Domestic Violence	46	0	46	20%
Unaccompanied Youth Under 18 years of age	0	0	0	0%
Total	231	35	266	100.00%

As the chart illustrates, the chronically homeless accounted for over one quarter of those interviewed.

4. Homelessness Prevention and Outreach

Norristown will support efforts of human service agencies, social service providers, and other organizations that provide services and assistance to individuals and families who are at imminent risk of becoming homeless in as far as permanent housing is concerned and any efforts geared towards deconcentration of resources.

Norristown is a participant in the development of the Montgomery County’s Ten Year Plan to End Homelessness. It will support all actions to implement this strategy, specifically actions related to establishing permanent housing for the homeless and deconcentration of services from Norristown. This CoC Ten Year Plan lists the following 2008 Local Action Steps to attain HUD’s National Objective of ending chronic homelessness and moving families and individuals into permanent housing:

Increase the percentage of homeless persons moving from transitional to permanent housing to at least 63.5%

- Action Step 1: Work with the Montgomery County Housing Authority to establish preference in public housing and Housing Choice Voucher Program for homeless households leaving transitional housing
- Action Step 2: Establish County policies to prioritize use of County dollars for permanent housing affordable to families and individuals moving from transitional housing

Action Step 3: Identify reasons for non-participation by private landlords in rental assistance programs and explore and implement new landlord initiatives that will increase housing available to homeless families and individuals

Increase percentage of homeless persons staying in Public Housing over 6 months to at least 71.5%:

Action Step 1: Develop a Housing Tool Kit for use by case managers and other service providers to assist homeless to obtain and maintain housing;

Action Step 2: Develop and conduct training on tenant/landlord rights and responsibilities

Action Step 3: Develop a Peer Housing Support Program

Increase the percentage of homeless persons employed at exit to at least 19%:

Action Step 1: Work with the County Department of Economic Development and Workforce Investment Board to target homeless persons and to address specific impediments to their participation in employment programs

Action Step 2: Advocate with public welfare staff to maximize mainstream benefits for the homeless, including increasing awareness of how to assist food stamp recipients to utilize federal match for employment and training

Action Step 3: Continue to increase access to education through the Power Program, a program for people with serious mental illness and co-occurring disorders

Decreasing the number of homeless households with children:

Action Step 1: Develop pilot project with centralized intake for families and take other steps to move Montgomery County agencies addressing homeless families to the Rapid Re-housing Model

Action Step 2: Since close to 70% of homeless families are in transitional housing, work with the Montgomery County Public Housing Authority to establish preference in public housing and Housing Choice Voucher Program for homeless households leaving transitional housing

Action Step 3: Examine and strengthen policies to better utilize and coordinate state Housing Assistance Program (HAP) resources with McKinney and other programs serving homeless families

Create new Public Housing beds for chronically homeless persons:

Action Step 1: Target 20 slots in new county mental health housing plan funded with Health Choices Reinvestment dollars for the chronically homeless

Action Step 2: Adopt a policy to give priority to the chronically homeless in the County-funded Tenant Based Rental Assistance Voucher program

Action Step 3: Designate Horizon House's 2007 3-bedroom Shelter Plus Care program for chronically homeless individuals

5. Discharge Coordination Policy

Foster Care Discharge Policy

As described in the 2008 Continuum of Care Discharge Planning Protocols Narrative for the Lower Merion/Norristown/Abington region of Montgomery County, work is continuing for discharge protocol for youth exiting the foster care system. In the meantime, the Office of Children and Youth (OCY) works with youth to ensure that appropriate housing is in place prior to their exit from the system. Independent living services are provided to those aged 16 to 21 who reside in out-of-home placement facilities. Aftercare services are also provided to promote self-sufficiency through support in employment, education, life skills, preventive services, and housing. Seventeen-year-old youths are now eligible for the county's Emergency Tenant Based Rental Program. OCY also supports the Valley Youth House TBRA program for young adults aging out of foster care developed through collaboration with the county agencies and the housing authority. In addition, the Commonwealth of Pennsylvania is working to develop a protocol for foster discharge. If passed, it would provide for the disposition of dependent children. This includes the development of a written plan that identifies appropriate services and supports for the child's transition from the child welfare system and requires a description of the child's suitable housing plan.

Health Care Discharge

As described in the 2008 Continuum of Care Discharge Planning Protocols Narrative for the Lower Merion/Norristown/Abington region of Montgomery County, hospitals in Pennsylvania must have written discharge policies for appropriate referral and transfer plans that comply with requirements of the Federal Conditions for Participation in Medicare and Medicaid Services and the Pennsylvania Code (028 Section 105.21 to 105.25). Ensuring compliance with these regulations is the responsibility of the PA Department of Health, Division of Acute and Ambulatory Care.

Mental Health Discharge

As described in the 2008 Continuum of Care Discharge Planning Protocols Narrative for the Lower Merion/Norristown/Abington region of Montgomery County, the Commonwealth of PA has a formal policy that no discharge from a state hospital can occur unless all housing, treatment, case management, and rehabilitation services are in place at the County level. In Montgomery County, there is a letter of Agreement between Norristown State Hospital (NSH) and the County Office of Mental Health/Mental Retardation/Drug and Alcohol/Behavioral Health related to the continuity of care for individuals who leave the hospital. OMH has developed a Continuity of Care Manual that serves as a guide to the roles of NSH team members responsible for discharge planning. OMH has a dedicated staff person on the grounds of the state hospital. Hospital staff sends the County staff an Active Discharge Candidate Notice informing him of all pending discharges so that he can assist in the assessment and planning, especially for those who may be difficult to place or require extra supports. In addition, to ensure that the person being discharged has adequate housing, the staff coordinator makes sure that he/she is linked to the County mental health system before discharge so that there is no hiatus in medication or mental health services.

Correctional Institution Discharge

As described in the 2008 Continuum of Care Discharge Planning Protocols Narrative for the Lower Merion/Norristown/Abington region of Montgomery County, the Commonwealth of PA has two ways of ensuring that individuals released from State Correctional Institutions do not become homeless. First, the PA Department of Corrections issued a policy statement on Inmate Re-entry and Transition on January 5, 2006. It requires that the Continuity of Care planners in each institution make every effort to assure a viable home plan and follow-up services for all who will be released at the maximum term of their sentence. This policy includes providing each inmate with written information on housing, ID, and other personal documents. Of particular relevance are sections I-VIII, A 1-2(d), H1-5 and 3A 1-5. Second, the PA Board of Probation and Parole has a formal policy that no individual may be released on parole without an approved Home Plan. Reference to this policy is found in Chapter 623 of the PA Code, Conditions Governing Parole. Section 63.4(2) specifically relates to housing.

On the County level, the Montgomery County Correctional Facility (MCCF) will not discharge an individual on parole without a verified address. The County Office of Mental Health has developed protocols for linkage, ongoing treatment services, and the identification of a housing plan for persons who have been identified as having a serious mental illness who are leaving state prisons, those being discharged from MCCF, and residents of the county being discharged from other County prisons in the region.

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 4 Action Plan ESG response:

NOT APPLICABLE

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 4 Action Plan Community Development response:

1. Priority Non-Housing Community Development Needs

The Municipality has identified the need for public infrastructure improvements, public facility improvements, and public service activities throughout Norristown. Most of these projects involve roadway and streetscape improvement projects.

2. Specific Short-Term and Long-Term Objectives

The Municipality of Norristown has determined the following non-housing priorities for the next five years:

Infrastructure

Public infrastructure in many CDBG-eligible areas of Norristown is inadequate for current demands. Where and when appropriate, the Municipality will augment its capital expenditures with resources from the Consolidated Plan when those resources support new construction projects or rehabilitation projects of existing units. In addition, these activities must benefit LMI persons. Priority projects in the infrastructure category include the reconstruction of streets and sidewalks that are heavily traveled and in need of repair. These projects will contribute to the safety and quality of life of neighborhoods throughout the Municipality of Norristown and will benefit LMI persons.

- **Long-Term Goals:** Provide financial assistance in the construction and replacement of infrastructure elements necessary to preserve existing affordable residential areas. Activities funded through the CDBG program should also improve the economic viability of existing and potential businesses in Norristown.

- **Short-Term Goals:**

- Sidewalk Improvements along the 100 block of West Marshall Street that involve new sidewalks and urban friendly trees. It is expected to benefit 1696 persons, approximately 78% of whom are LMI.

Public Facilities Improvements (including Parks and Recreation)

In August 2005, the Municipality of Norristown drafted an Open Space Plan in conjunction with the Montgomery County Green Fields/Green Towns Program. The plan identified a number of municipal-wide locations for park improvements, as well as the implementation of Municipality-wide green infrastructure. A majority of these projects are located within CDBG eligible areas. As such, the Municipality of Norristown plans to provide resources to these projects when available to help improve the Municipality's various parks and playgrounds. Improvements will include safety upgrades and equipment upgrades to ensure that all facilities meet industry standards for safety and ADA compliance.

- **Long-Term Goals:** Provide financial assistance in making rehabilitation, repairs, and other improvements to public facilities, such as parks and playgrounds, to enhance the quality of public facilities and increase access to public facilities for LMI persons. These projects advance the Municipality's goal of improving quality of life for LMI households.
- **Short-Term Goals:** Public facilities improvements are undertaken for the purpose of improving living conditions:
 - Continuation of the Poley Park Improvement Project involving physical construction of amenities based on recommendations developed through a public master planning process. It is expected to benefit 1,520 persons, approximately 72% of whom are LMI.
 - Continuation of the Simmons Park Improvement Project inclusive of site furnishings, landscaping, and hardscapes. Funds are leveraged with funding from DCED and County Open Space funds. It is expected to benefit 2,637 persons, approximately 70% of whom are LMI.

Economic Development

Norristown's 2000 Economic Revitalization Strategy was updated in June 2009 for the Municipality of Norristown. The study area for the master plan encompasses the entire Municipality, although many of the recommendations relate to the downtown area. The goals of the revitalization plan are to develop means of maximizing the tax base, improve the quality of life for residents of Norristown, and promote retail, office, and entertainment uses in the downtown. Future Annual Plans may include appropriations for economic development projects when those requested resources could be shown to benefit low and moderate income residents of Norristown. When funds are available, the Municipality will support job training and mentoring services provided through the Opportunities Industrialization Center (OIC) in an attempt to improve the economic opportunities available to low income persons.

- **Long-Term Goals:** Improve the economic opportunities available to low income persons and enhance skills of the labor force to make Norristown a more attractive business climate for existing and potential businesses.
- **Short-Term Goals:**

- Main Street Economic Development Initiative for the downtown business district to help in job creation and retention. It is expected to create two moderate income jobs.
- Small Business Assistance Center to help small businesses to locate in and stay in Norristown, to prepare business plans, start-up assistance, source library and development of resource material. Businesses served have to meet the micro-business criteria of five or fewer employees, one or more of whom owns the business. It is expected to create or retain two low moderate income jobs.

Public Services

To assist in providing services to area residents and in building better neighborhoods, the Municipality of Norristown may support activities related to improving the quality of life and the competitiveness of the labor force. In addition, the Municipality will provide funding, through a combination of federal and non-federal sources, for code enforcement and demolition activities aimed to improve and sustain the suitable living environment across Norristown's various neighborhoods. The Municipality will support miscellaneous youth educational programs when funding is available, including programs provided by Opportunities Industrialization Center, which benefits children from low income families.

- **Long-Term Goals:** Collaborate with local nonprofit organizations and other social service agencies to provide for the human service needs of LMI residents (including homeless and those at risk of becoming homeless). Improve the competitiveness of the Municipality's labor force by supporting literacy and job training services to LMI individuals.
- **Short-Term Goals:** Assist with the various youth educational and mentoring programs such as the OIC literacy and GED programs, and also be a part of the Continuum of Care process in Montgomery County as far as permanent housing is concerned and de-concentration of resources.
 - Ongoing support of Fair Housing Rights Center in their awareness campaign targeting realtors, landlords and homeowners with warnings against block busting, foreclosure rescue scams, workshops on fair housing rights, and advocacy for victims of housing discrimination. Expected number of people to benefit is 600.
 - Continuum of Care process in the county with participation limited to provision of Permanent Housing and encouraging of de-concentration of resources to ensure that services are not just concentrated in the Municipality of Norristown.

Antipoverty Strategy

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

Program Year 4 Action Plan Antipoverty Strategy response:

1. Actions to Reduce the Number of Poverty Level Families

The key to Norristown's anti-poverty strategy lies in the resurgence of its economy through business development and job training. The Municipality's government has already committed funds to improve critical public spaces downtown and throughout Norristown. Norristown has also actively sought and encouraged private renovations and new business start-ups. A revitalized Norristown will mean capturing business and reviving the economy, thereby increasing employment opportunities for households living in poverty. The Municipality will also actively pursue channels for job training and other workforce development.

However, providing better income opportunities is only half the battle. Norristown will also continue to ensure the availability of affordable housing by continuing its owner-occupied housing, first-time homebuyer, and acquisition/rehabilitation/resale programs. By increasing the skills of the workforce and reducing the cost of housing, the Municipality will reduce the number of individuals and families living in poverty.

The multiple aspects of the Municipality's anti-poverty strategy programs run by the Municipality or its subrecipients, when working in concert, have the ability to reduce the number of households with incomes below the poverty level. Specific components of the Municipality's anti-poverty strategy as are follows:

Housing

A lack of affordable housing places housing cost burdens on low to moderate income persons, limiting their ability to pay for other goods and services, such as quality education or needed prescriptions. The Municipality's housing efforts are aimed at improving and maintaining a high standard of housing quality while also creating or maintaining affordability.

Over the five-year period of the Consolidated Plan, and one year Action Plan period, the Municipality will also work with agencies that provide expanded housing options to current and potential Norristown residents. These agencies include Montgomery County Housing Authority, Genesis Housing, Habitat for Humanity, and Hedwig House, all of which assist many lower-income renters, including those with disabilities.

Social Services

Several social service programs are offered by subrecipients of CDBG funds in Norristown to provide assistance to persons with incomes below the poverty level. The Municipality provides assistance to the Opportunities Industrialization Center and the Carver Community Center, as well as being the financial conduit for funds for the Norristown Weed and Seed program.

Economic Development

- On March 18, 2008, the Municipality, in conjunction with the Norristown Area School District and Montgomery County, authorized its first Tax-Increment Financing project at the Bell Telephone Building at 401-4-3 DeKalb Street. The

project entails the utilization of 12,140 square feet for office space and a potential restaurant. The project is expected to significantly enhance the real estate value of the surrounding properties and boost revitalization efforts.

- The State has committed to \$10 million in Redevelopment Assistance Capital Program funds for rehabilitation of Studio Centre at Logan Square. This project originally proposed to build five studios amounting to 74,000 square feet of studio space. Other uses are proposed for the site, including a restaurant, a 50,000 square foot supermarket, and 20,000 square feet of retail space. With the economic downturn, this project has morphed leading to the elimination of the studios and instead expanding and creating the headquarters of USM, an outsourcing company, and the creation of more than 500 jobs that will benefit Low to moderate income residents of the community. As part of this allocation, Studio Centre has also applied for both County and Norristown Section 108 loan funds. To date, they have been awarded \$10million from the County Section 108 loan funds. The \$5 million section 108 loan application from Norristown's HUD allocation for this project is still pending. This project will boost revitalization efforts and create much-needed jobs in the area.
- The State also committed \$500,000 in Redevelopment Assistance Capital Program funds for the rehabilitation of a former 18 unit apartment building on Dekalb Street, into 12 Condominium style Townhouses. In addition to those funds, there was also a commitment of \$450,000 from the County Affordable Housing Trust Fund, \$500,000 from Norristown's allocation of HOME DCED funds and \$30,000 in First Time Home Buyer Assistance grants. This would ensure a fully funded project that would not only revitalize and stabilize this neighborhood but also create jobs and new housing units for low to moderate income residents.
- The Municipality's community development and public infrastructure are designed to improve the attractiveness of downtown Norristown to existing and potential businesses. Roadway infrastructure projects will improve connectivity to the surrounding highway system, as well as circulation within Norristown for both pedestrians and automobiles. Park improvements will improve the quality of life for residents and workers, while making the area more attractive aesthetically.

2. Estimated Reduction in the Number of Poverty-Level Families

Poverty is a function of income. Factors that affect income are education, job training, health, housing quality, cost of living, and employment. As a single unit of government, the Municipality of Norristown has only limited influence on the overall factors that cause poverty. However, the Municipality has chosen to maximize its resources to provide quality services to low income residents to help them improve their incomes.

The percentage of Norristown households living in poverty increased between 1990 and 2000, according to Census data. In 1990 there were 2,838 individuals living below the poverty line in Norristown, which was 9.5% of the population for which poverty status had been determined. By 2000, that group had increased to 5,238 persons, which represented 17.2% of the population. Notably, the increase in persons living in poverty occurred with a decrease in overall population.

Through the methods described above, the Municipality can positively influence the likelihood of poverty-stricken residents of moving up and out of poverty. Norristown can reduce the number of residents living in poverty by minimizing threats to individual and family financial stability and by extending services that will provide adequately for those in need. Ultimately, federal and state policies on welfare, health care, and the minimum wage are also crucial factors in the fight to address and reduce poverty. The Municipality will continue to support organizations that provide supportive services, to encourage local economic development, and to preserve and improve affordable housing options as part of its strategy to prevent and alleviate poverty.

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 4 Action Plan Specific Objectives response:

1. Priorities and Objectives

The priorities and objectives identified below are not presented in order of preference. They are grouped by type of activity and are based on information obtained from housing and social service providers.

Priorities for the Elderly/Frail Elderly Populations

- Support activities that provide affordable housing for elderly and frail elderly residents at or below 50% of area median income.
- Support activities that provide the elderly and frail elderly with benefits counseling, care coordination, transportation, and other services.
- Explore the possibility of creating new affordable housing options for the elderly population. There is a need for additional housing units that provide supportive services.

The Municipality will support the efforts of organizations that seek to provide affordable housing for the elderly and frail elderly, as well as those organizations that provide services to the elderly and frail elderly. Due to the limited funding amounts the Municipality receives, it cannot allocate CDBG funds to elderly and frail elderly related projects. However, the Municipality will support such efforts by issuing certificates of consistency for any elderly affordable housing or service-related projects submitted to the Municipality for approval by other entities in Norristown.

Priorities for Persons with Mental Illness

- Offer support and assistance to local agencies in Norristown that provide supportive services and outreach programs to individuals with mental illness.

Norristown will aid the efforts of area organizations that provide supportive services and transitional and supportive permanent housing options to persons with mental illness. The Municipality will issue certificates of consistency for any projects undertaken by other entities that include the provision of housing and other supportive services for persons suffering from mental illness, especially as they pertain to de-concentration.

Priorities for Persons with Disabilities

- Support tenant-based rental assistance subsidies, should they become available, to serve more individuals and families who have disabilities, and are in danger of becoming homeless especially if they are not concentrated in Norristown.
- Increase the supply of affordable, accessible housing for homeownership.
- Support activities that provide persons with disabilities with the resources necessary to make improvements to their homes.

The Municipality will support efforts to increase the supply of affordable, accessible Permanent housing within Norristown.

Priorities for Persons with Alcohol and Drug Addiction

- Offer support to local agencies that provide outreach programs to individuals with drug and alcohol problems which are located outside of Norristown.
- Maintain the supply of transitional and permanent supportive housing for individuals with drug and alcohol addiction, while encouraging deconcentration of these facilities.

The Municipality is willing to grant certificates of consistency for projects submitted for approval by area organizations. Such projects should support individuals with drug and alcohol addiction through the creation of transitional and supportive housing and the provision of supportive services outside of Norristown.

Priorities for Persons with HIV/AIDS

- Support efforts that provide affordable housing to people living with HIV/AIDS.
- Support organizations that provide supportive services to people living with HIV/AIDS.

The Municipality will support area organizations that provide supportive services and affordable housing options for people living with HIV/AIDS. The Municipality will issue certificates of consistency for any projects meeting the aforementioned criteria that are submitted for review.

All non-homeless special needs categories have been labeled either Medium or Low priority activities. Even though these activities are not viewed as a High priority, they are still important and are not meant to be understood as being unnecessary in the Municipality of Norristown. Rather, it is perceived that those needs are already overly concentrated in Norristown versus Countywide, and may also have other, more appropriate funding sources. The Municipality of Norristown has identified a limited number of priorities to provide a focus for activities that will be funded in the next year. If a high priority proposal is not received during the local CDBG application process, a medium priority project may be funded.

2. Resources Expected to be Available

The Municipality anticipates receiving \$758,731 in CDBG funds in PY2013. These funding sources will be available to help support public improvements, the delivery of services, affordable housing projects, housing rehabilitation programs, and homeless outreach and prevention activities.

It is increasingly difficult for the Municipality of Norristown to fund non-homeless special needs projects due to the limited amount of funding the Municipality receives annually to support housing and community development initiatives, as well as the increasing amount of basic community needs resulting from current economic conditions. However, other resources are available on the federal, state, and local levels that area organizations can solicit to help provide affordable housing opportunities and supportive services to Norristown's non-homeless special needs populations.

There are several resources available to support non-homeless special needs housing initiatives, including HUD Section 202 housing funds (elderly projects), HUD Section 811 housing funds (housing for people with disabilities), Housing Choice Voucher (formerly Section 8) tenant- and project-based rental assistance, Low Income Housing Tax Credits (LIHTC), Federal Home Loan Bank funds, funds from private foundations and other private entities, public housing funds, HOPWA funds, and other state and federal resources.

The Municipality will continue to support the efforts of local and regional organizations that provide housing and supportive services to non-homeless special needs individuals in Norristown, to the best extent possible while encouraging de-concentration of these resources to other parts of the County.

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 4 Action Plan HOPWA response:

NOT APPLICABLE.

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 4 Specific HOPWA Objectives response:

NOT APPLICABLE.

Other Narrative

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

NOT APPLICABLE.