



2024 Annual Action Plan (PY50)

DRAFT

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Annual Action Plan
2024

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Executive Summary

AP-05 Executive Summary - 24 CFR 91.200(c), 91.220(b)

1. Introduction

The City of Stamford (City) is designated a federal entitlement city under the U.S. Department of Housing and Urban Development (HUD) and annually receives grant funds for the Community Development Block Grant (CDBG) and HOME Investment Partnerships Program (HOME). The City works to provide safe, decent and affordable housing, a suitable living environment and economic opportunities especially for low- to moderate-income (LMI) households and special needs communities.

As a HUD entitlement community, every five years the City is required to submit a Consolidated Plan which includes an extensive citizen participation process, a community needs assessment, a housing market analysis and a Strategic Plan which explains how the priority needs of the community identified in this Plan translate to goals and objectives.

Annually, the City submits an Annual Action Plan (AAP) based off the needs and goals identified in the Strategic Plan and demonstrates how the City will use community development resources to address the needs of the Stamford's LMI residents. This plan is the 2024 AAP (Year 50), and covers July 1, 2024, through June 30, 2025, for the use of both CDBG and HOME funds. PY 2024 is the fifth and final year of the Consolidated Plan period, and the next program year will start a new five-year cycle.

2. Summarize the objectives and outcomes identified in the Plan

The City of Stamford has developed its strategic plan based on an analysis of the data presented in this plan and an extensive community participation and consultation process. Through these efforts, the City has identified four priority needs with associated goals to address those needs. The priority needs with associated goals include:

Priority Need: Expand and Improve Public Infrastructure and Facilities

1A Expand and Improve Public Infrastructure

Expand public infrastructure through development activities for LMI persons and households. Activities can include adding ADA compliance for curb ramps and sidewalks, roadway expansion projects, and improve water and sewer systems.

1B Improve Access to Public Facilities

Expand public facilities through development activities for LMI persons and households. Activities can include improved access to neighborhood and community centers and parks and recreation centers.

Priority Need: Preserve & Develop Affordable Housing

2A Increase Homeownership Opportunities

Provide for increased homeownership opportunities for LMI households through direct financial assistance activities for LMI households.

2B Increase Affordable Rental Housing Opportunities

Provide for multi-family housing rental development and rehabilitation. These activities will benefit LMI households.

2C Provide for Owner Occupied Housing Rehabilitation

Provide for owner occupied housing rehabilitation. These activities will benefit LMI households.

Priority Need: Public Services and Quality of Life Improvements

3A Provide Supportive Services for Special Needs

Provide supportive services for special needs populations such as senior services for the elderly, services for persons with a disability, youth services and homeless services for persons experiencing homelessness.

Priority Need: Provide for Economic Opportunities

4A Provide Financial Assistance New Expanding Businesses

Provide economic development support using funds to assist small businesses to create and retain jobs.

The 2024 AAP allocates funds to provide affordable housing and to create a suitable living environment through CDBG and HOME activities.

CDBG funds will address the affordable housing objective with affordable housing opportunities and housing rehab activities. Public service activities will help create a suitable living environment. Activities include health and homeless related services, services for seniors, services to domestic violence victims, and activities for youth. Public improvement activities will revitalize low/mod areas through public facility improvements and improve handicapped accessibility in those areas.

HOME funds will be used to create units of affordable housing by rehabilitating rental units, assisting in construction of new units, and by providing down payment assistance.

3. Evaluation of past performance

The City of Stamford, with other public, private and non-profit community housing providers and non-housing service agencies have made significant contributions to provide safe, decent and affordable housing, a suitable living environment and economic opportunities, especially for low- to moderate-income households and special needs groups in the community. However, improvements to public facilities and infrastructure, vital public services, affordable housing and economic development remain some of the most prolific needs facing the City of Stamford, as documented by the current Consolidated Plan, and the PY 2022 Consolidated Annual Performance and Evaluation Report (CAPER), which is the most recent CAPER report. As reported in the PY 2022 CAPER,

the following activities were completed by the City.

Public Services: The City assisted 3,483 LMI persons with vital public services throughout the program year. The majority of these services were to assist the elderly at River House Adult Day Care (404 persons), Person to Person-Critical Needs program (2,942 persons) and with the Silversource Elderly Medical Program (97 persons). Housing information was also provided for 40 LMI persons at the Woman's Housing Life Coach program. Public service programs provide for basic needs and services that help to offset costs and promote housing stability. For the overall five-year SP goal, the goal outcomes have already been met.

Public Facilities and Infrastructure: The City assisted 841 LMI persons with improvements to public facilities. Activities included improvements to facilities for persons with a disability and youth centers. Unfortunately, the City did not meet its goals for PY 2022, however this was mainly a result of activity accomplishment set-ups. The City anticipated to have activities that had a low/mod area benefit, however benefits were recorded by intake. The City will make adjustments in the future to capture accomplishments accordingly.

Affordable Housing: There were no affordable housing activities completed in PY 2022 for CDBG or HOME. The City is however working on two modernization rehab activities with the New Neighborhood Friendship House heating upgrades at their housing facility, and improvements to the cold storage walk-in unit at SHA's Scofield Manor housing facility. The City is also working with 16 LMI households on new homebuyer opportunities through the down payment assistance program. These activities will be reported in the next CAPER when they are completed. Overall, the City has met its goals for rental development and rehab, and is still on track to meet housing opportunities for LMI homebuyers.

CARES Act Accomplishments

The City completed one CV-Public Service activity in PY 2022. This program was the SilverSource Elderly Medical Program which helped to provide medicine and PPE equipment for 97 seniors in Stamford. The City will continue to work on the established goals for the CDBG-CV program and will continue reporting these accomplishments in future CAPER reports.

4. Summary of Citizen Participation Process and consultation process

The Citizen Participation Process and consultation of local community stakeholders occurred as outlined in the City Citizen Participation Plan. The document is included with each application packet and defines the publication schedule, goals and public hearing dates and procedures. Legal notices were published in The Advocate and information was distributed by email and made available online. A public comment period was held as well as a public hearing to allow members of the public to review and give feedback on the plan. Documents were made available online on the City website, and also made available at

the Government Center in the Community Development Office. The following are details of the outreach efforts:

30-DAY PUBLIC COMMENT PERIOD: The proposed 2024 AAP will be available for review and comment from **May 29, 2024 to June 28, 2024** via the City's Community Development website, <https://www.stamfordct.gov/community-development-office>, and from 9:00 am to 4:00 pm, Monday-Friday, at the Stamford Community Development Office (when open to the public), 888 Washington Blvd. 9th Floor, Stamford, CT. Written comments on these proposed AAP should be submitted via email to communitydevelopment@stamfordct.gov or to the Stamford Community Development Office at the above address.

PUBLIC HEARING: On **Tuesday, June 25, 2024, at 6:30 pm**, during the Housing, Community Development and Social Services (HCD/SS) Committee of the Board of Representatives will hold a public hearing to accept verbal or written comments from citizens regarding the proposed AAP. More Information: <http://www.boardofreps.org/calendar.aspx> For a summary of details of citizen participation outreach activities, see AP-12 Participation.

5. Summary of public comments

The City of Stamford adheres closely to its HUD approved Citizen Participation Plan and encourages all citizens, and especially low- to moderate-income households and persons with special needs, to participate in the Planning process. In accordance with the Citizen Participation Plan, the City has developed a formal process for soliciting citizens' input in developing the Annual Action Plan. A public hearing and public comment review period allowed the public an opportunity to review the Annual Action Plan.

A summary of comments will be provided at the conclusion of the public comment period and after the public hearing. For more details see the PR-12 Participation section.

A citizen participation attachment showing the City's outreach efforts will be attached to this AAP when the plan is submitted to HUD.

6. Summary of comments or views not accepted and the reasons for not accepting them

All comments will be accepted and welcome. No comments or views will be rejected or not accepted.

A summary of comments will be provided at the conclusion of the public comment period and after the public hearing. For more details see the PR-12 Participation section.

A citizen participation attachment showing the City's outreach efforts will be attached to this AAP when the plan is submitted to HUD.

7. Summary

The PY 2024 AAP is the fifth and final year of the 2020-2024 Consolidated Plan. The activities funded address the needs of the community and further builds on the accomplishments of the goals established in the 5-Year Strategic Plan.

Analysis of Impediments to Fair Housing Choice

The City of Stamford completed an Analysis of Impediments to Fair Housing Choice (AI), which was originally developed in March of 2007 and has since been followed by subsequent 5-Year Housing Affordability Plans (HAP). The most recent HAP was approved in May of 2022. Together the AI and HAP identify the housing issues the City faces and provides recommendations as well as a strategy to overcome these issues.

The lack of quality affordable housing and a lack of access to housing caused by a growing population were impediments identified in the AI. The AI also identified actions to take to overcome the effects of these impediments, which were:

- Increase home-ownership opportunities for LMI households.
- Improve the quality and number of affordable rental units to provide choice for LMI renters.
- Improve access to housing opportunities for LMI households.

The HAP expands on the housing issues identified in the AI and redefines the three identified needs as rental affordability, housing supply, and homeownership access. This activities in this plan continue to work towards addressing the identified impediments in the AI and HAP.

PR-05 Lead & Responsible Agencies – 91.200(b)

1. Agency/entity responsible for preparing/administering the Consolidated Plan

Describe the agency/entity responsible for preparing the Consolidated Plan and those responsible for administration of each grant program and funding source.

Agency Role	Name	Department/Agency
CDBG Administrator	STAMFORD	Community Development Office
HOME Administrator	STAMFORD	Community Development Office

Table 1 – Responsible Agencies

Narrative (optional)

The Community Development Office is the lead office for the development and administration of the City of Stamford's Consolidation Plan and Annual Action Plan.

Consolidated Plan Public Contact Information

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AP-10 Consultation – 91.100, 91.200(b), 91.215(I)

1. Introduction

The 5-Year Consolidated Plan and the Annual Action Plan is informed by ongoing collaboration between City departments and local and regional nonprofit agencies. The Community Development Office and the Board of Representatives HCD/SS Committee regularly consults agencies serving the needs of Stamford's LMI residents. This section describes the agencies and organizations that were consulted during the development of the plan.

Provide a concise summary of the jurisdiction's activities to enhance coordination between public and assisted housing providers and private and governmental health, mental health and service agencies (91.215(I))

The City continues to work closely with The Community Action Agency of Western Connecticut - the State funded CAP agency serving Stamford and provides the agency with office and program space in a City owned building. The City also consults with regional nonprofits such as the United Way of Western Connecticut and Fairfield County's Community Foundation to ensure awareness and coordination of efforts to meet the needs of housing providers, health, mental health and service agencies.

The City works with the Opening Doors Fairfield County (ODFC) to ensure its efforts align with regional work to address the challenge of homelessness. Other homeless service provider agencies the City works closely with are Inspirica, Laurel House and Pacific House.

In the arena of public and assisted housing the City consults with and regularly funds numerous not-for-profit affordable housing developers such as New Neighborhoods, Inc., Mutual Housing Association of Southwestern Connecticut and the Housing Authority of the City of Stamford (dba Charter Oak Communities).

As the internet has become an essential part of our lives on how we connect and communicate, efforts have also been made to consult with agencies and broadband providers that help to bridge the digital divide for LMI residents. The City identified and consulted with three (3) internet providers with service in the City and the Ferguson Library. These entities provided input and coordination with how the City could narrow the digital divide for LMI households in Stamford.

Additionally, the City seeks consultation from agencies, organizations and other governmental departments on hazard mitigation and emergency preparedness of natural or man-made disasters for the benefit of LMI residents.

Describe coordination with the Continuum of Care and efforts to address the needs of homeless persons (particularly chronically homeless individuals and families, families with children, veterans, and unaccompanied youth) and persons at risk of homelessness.

Stamford regularly participates and supports the efforts of the Fairfield County Continuum of Care (CoC) known as Opening Doors Fairfield County (ODFC). The City remains abreast of regional efforts to address the needs of homeless persons and persons at risk of homelessness. The City supports ODFC's application and provides assistance with the Environmental Review process. The City allocates CDBG funds to support programs and services that address the root causes of homelessness and provides support to address the needs of those who are homeless. The towns surrounding Stamford do not provide emergency, transitional or supportive housing shelters, Stamford's shelters must also serve the needs of the surrounding communities.

The CoC administers the Coordinated Access Network (CAN) for the region. The CAN system ensures that anyone, including chronically homeless, families and children, veteran and unaccompanied youth experiencing a housing crisis can easily access services through a defined point of entry: United Way 2-1-1. All households calling 2-1-1 speak with a housing specialist who provides appropriate referrals to prevent people from entering the homeless system. If no alternatives can be identified, 2-1-1 Call Specialists direct households to locally designated CAN sites, where specially trained staff assess each unique housing crisis and exhaust all opportunities for resolution.

The City also directly supports homeless services providers such as Pacific House, Inc. (f/k/a Shelter for the Homeless, Inc.), Inspirica, Inc., and Laurel House, Inc. One example of the efforts to address the needs of homeless persons is the work done by Laurel House which seeks to quickly connect individuals experiencing homelessness and living with serious mental illness to permanent housing and supplemental services. These agencies participate in the CoC with ODFC to streamline CAN. Pacific House, Inspirica, and Laurel House use HMIS to collect demographic and service information which provides data on homelessness in the region.

Laurel House has a Support Plus program which provides Permanent Supportive Housing (PSH) with enhanced support and supervision to chronically homeless individuals living with serious mental illness and other disabilities which further compromise their health. Support Plus is a hybrid program that was developed by Laurel House and endorsed by the then Stamford-Greenwich CoC, in response to an identified gap in appropriate services for seriously disabled individuals who need additional supports and a degree of supervision in order to succeed in PSH and to age in place where possible, without needing greater levels of specialized care.

Laurel House and Mutual Housing Association of CT work together to provide permanent supportive housing services to individuals living with mental illness, whom are chronically homeless and have history of chronic substance abuse. Participants are assigned a Residential Services Counselor who works to implement the individual's Recovery Plan using services, as appropriate, provided at the Laurel House

Resource Center. The Laurel House service model is an outbound model that provides Supported Housing residents services in their homes or at school, at work or in the community.

Describe consultation with the Continuum(s) of Care that serves the jurisdiction's area in determining how to allocate ESG funds, develop performance standards for and evaluate outcomes of projects and activities assisted by ESG funds, and develop funding, policies and procedures for the operation and administration of HMIS

The City does not receive ESG funds, however the City will continue to support and participate in the ODFC CoC. ODFC receives funds for the Homeless Management Information System (HMIS) system through the annual NOFA. Homeless service providers are trained in HMIS use, and ODFC seeks to "Ensure that there is a single, functioning HMIS and uniform manner to collect data for the CoC area. There is also an annual Point in Time count of homeless persons conducted by the ODFC and its members in the CoC region." ODFC has created a Standards and Evaluations Committee. The Committee duties include:

1. *Establish performance targets appropriate for population and program type.*
2. *Establish remedial action protocol for low performing grantees.*
3. *Establish written standards for providing assistance, as outlined in HUD Interim Rule § 575.7(a)(9). Ensure compliance with HUD standards.*
4. *Monitor Homeless Management Information System (HMIS) participation and compliance.*
5. *Monitor grantee performance, evaluate outcomes and take action against poor performers, as appropriate.*
6. *Monitor ESG funded programs and provide performance targets and feedback to appropriate funding entities.*

2. Describe Agencies, groups, organizations and others who participated in the process and describe the jurisdiction's consultations with housing, social service agencies and other entities

Table 2 – Agencies, groups, organizations who participated

1	Agency/Group/Organization	City of Stamford
	Agency/Group/Organization Type	Services - Housing Other government - Local
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homelessness Strategy Non-Homeless Special Needs Market Analysis Economic Development Anti-poverty Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	The City Community Development Office is the lead agency of the Consolidated Plan.
2	Agency/Group/Organization	Charter Oak Communities
	Agency/Group/Organization Type	PHA Services - Housing
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Public Housing Needs Homelessness Strategy Non-Homeless Special Needs
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	The City CD office continues to be engaged with Charter Oak Communities, the local PHA to identify housing and community development needs.
3	Agency/Group/Organization	Opening Doors Fairfield County ODFC
	Agency/Group/Organization Type	Services-homeless Continuum of Care
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homelessness Strategy Non-Homeless Special Needs

	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	The City CD office continues to be engaged with ODFC, the regional Continuum of Care and lead agency to address homeless needs in the area. The CoC helps to identify homeless, housing and community development needs.
4	Agency/Group/Organization	Inspirica, Inc.
	Agency/Group/Organization Type	Housing Services-Persons with Disabilities Services-Persons with HIV/AIDS Services-Victims of Domestic Violence
	What section of the Plan was addressed by Consultation?	Homeless Needs - Families with children Homelessness Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	The City consulted Inspirica through public hearings, reports, site visits, verbal and written correspondence. Feedback from the agency was incorporated into the Annual Action Plan. The agency was an applicant and receives CDBG funding.
5	Agency/Group/Organization	Pacific House, Inc.
	Agency/Group/Organization Type	Services-homeless
	What section of the Plan was addressed by Consultation?	Homeless Needs - Chronically homeless Homelessness Needs - Veterans Homelessness Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	The City consulted Pacific House through public hearings, reports, site visits, verbal and written correspondence. Feedback from the agency was incorporated into the Annual Action Plan.
6	Agency/Group/Organization	Laurel House
	Agency/Group/Organization Type	Services-homeless
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homelessness Strategy Non-Homeless Special Needs

	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	The City consulted Laurel House through public hearings, reports, site visits, verbal and written correspondence. Feedback from the agency was incorporated into the Annual Action Plan.
7	Agency/Group/Organization	Womens Mentoring Network
	Agency/Group/Organization Type	Services-Victims of Domestic Violence
	What section of the Plan was addressed by Consultation?	Non-Homeless Special Needs
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	The City continues to be engaged with the Womens Mentoring Network. Feedback from the agency was incorporated into the Annual Action Plan. The agency was an applicant and receives CDBG funding.
8	Agency/Group/Organization	Liberation Programs
	Agency/Group/Organization Type	Services- Substance Abuse
	What section of the Plan was addressed by Consultation?	Non-Homeless Special Needs
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	The City continues to be engaged with Liberation Programs. Feedback from the agency was incorporated into the Annual Action Plan. The agency was an applicant and receives CDBG funding.
9	Agency/Group/Organization	Children’s Learning Center
	Agency/Group/Organization Type	Services-Children
	What section of the Plan was addressed by Consultation?	Community Development Needs
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	The City continues to be engaged with the Children’s Learning Center. Feedback from the agency was incorporated into the Annual Action Plan. The agency was an applicant and receives CDBG funding.

10	Agency/Group/Organization	Person to Person
	Agency/Group/Organization Type	Housing Services - Housing Services-homeless Services-Health
	What section of the Plan was addressed by Consultation?	Homeless Needs - Families with children Homelessness Strategy Non-Homeless Special Needs
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	The City continues to be engaged with Person to Person. Feedback from the agency was incorporated into the Annual Action Plan. The agency was an applicant and receives CDBG funding.
11	Agency/Group/Organization	Abilis, Inc.
	Agency/Group/Organization Type	Services-Children
	What section of the Plan was addressed by Consultation?	Non-Homeless Special Needs
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	The City continues to be engaged with Abilis, Inc. Feedback from the agency was incorporated into the Annual Action Plan. The agency was an applicant and receives CDBG funding.
12	Agency/Group/Organization	Saint Joseph Parenting Center
	Agency/Group/Organization Type	Services-Children
	What section of the Plan was addressed by Consultation?	Non-Homeless Special Needs
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	The City continues to be engaged with the Saint Joseph Parenting Center. Feedback from the agency was incorporated into the Annual Action Plan. The agency was an applicant and receives CDBG funding.
13	Agency/Group/Organization	ARI, INC.
	Agency/Group/Organization Type	Services-Persons with Disabilities Health Agency
	What section of the Plan was addressed by Consultation?	Non-Homeless Special Needs

	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	The City continues to be engaged with ARI, INC. Feedback from the agency was incorporated into the Annual Action Plan. The agency was an applicant and receives CDBG funding.
14	Agency/Group/Organization	Kids in Crisis
	Agency/Group/Organization Type	Services-Children
	What section of the Plan was addressed by Consultation?	Non-Homeless Special Needs
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	The City continues to be engaged with Kids in Crisis. Feedback from the agency was incorporated into the Annual Action Plan. The agency was an applicant and receives CDBG funding.
15	Agency/Group/Organization	River House Adult Daycare
	Agency/Group/Organization Type	Services-Persons with Disabilities Services-Elderly
	What section of the Plan was addressed by Consultation?	Non-Homeless Special Needs
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	The City continues to be engaged with River House Adult Daycare .Feedback from the agency was incorporated into the Annual Action Plan. The agency was an applicant and receives CDBG funding.
16	Agency/Group/Organization	YMCA
	Agency/Group/Organization Type	Services-Children
	What section of the Plan was addressed by Consultation?	Non-Homeless Special Needs
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	The City continues to be engaged with the YMCA Feedback from the agency was incorporated into the Annual Action Plan. The agency was an applicant and receives CDBG funding.
17	Agency/Group/Organization	SilverSource
	Agency/Group/Organization Type	Services-Elderly Services-Health

	What section of the Plan was addressed by Consultation?	Non-Homeless Special Needs
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	The City continues to be engaged with SilverSource. Feedback from the agency was incorporated into the Annual Action Plan. The agency was an applicant and receives CDBG funding.
18	Agency/Group/Organization	Community Health Center
	Agency/Group/Organization Type	Services-Health Services-Elderly Health Agency Publicly Funded Institution/System of Care
	What section of the Plan was addressed by Consultation?	Non-Homeless Special Needs Community Development
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	The City continues to be engaged with the Community Health Center. Feedback from the agency was incorporated into the Annual Action Plan. The agency was an applicant and receives CDBG funding.
19	Agency/Group/Organization	Domus Kids
	Agency/Group/Organization Type	Services-Children
	What section of the Plan was addressed by Consultation?	Non-Homeless Special Needs Community Development
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	The City continues to be engaged with Domus Kids. Feedback from the agency was incorporated into the Annual Action Plan. The agency was an applicant and receives CDBG funding.
20	Agency/Group/Organization	The Rowan Center
	Agency/Group/Organization Type	Services-Victims
	What section of the Plan was addressed by Consultation?	Non-Homeless Special Needs

	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	The City continues to be engaged with the Rowan Center. Feedback from the agency was incorporated into the Annual Action Plan. The agency was an applicant and receives CDBG funding.
21	Agency/Group/Organization	New Covenant Center
	Agency/Group/Organization Type	Services-Children Services-Elderly Hunger Prevention
	What section of the Plan was addressed by Consultation?	Non-Homeless Special Needs Anti-Poverty Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	The City continues to be engaged with New Covenant Center. Feedback from the agency was incorporated into the Annual Action Plan. The agency was an applicant and receives CDBG funding.
22	Agency/Group/Organization	United Way of Western CT
	Agency/Group/Organization Type	Services-Children Nonprofit
	What section of the Plan was addressed by Consultation?	Non-Homeless Special Needs Anti-Poverty Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	The City continues to be engaged with the United Way of Western CT. Feedback from the agency was incorporated into the Annual Action Plan. The agency was an applicant and receives CDBG funding.
23	Agency/Group/Organization	Domestic Violence Crisis Center
	Agency/Group/Organization Type	Services-Housing Services-Homeless Services-Victims of Domestic Violence
	What section of the Plan was addressed by Consultation?	Homelessness Needs - Chronically homeless Homelessness Needs - Families with children Homelessness Strategy

	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	The City continues to be engaged with the DVCC. Feedback from the agency was incorporated into the Annual Action Plan. The agency was an applicant and receives CDBG funding.
24	Agency/Group/Organization	New Neighborhoods
	Agency/Group/Organization Type	Housing Services-Housing
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Non-Homeless Special Needs Market Analysis
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	The City continues to be engaged with New Neighborhoods. Feedback from the agency was incorporated into the Annual Action Plan. The agency was an applicant and receives CDBG funding.
25	Agency/Group/Organization	BroadbandNow
	Agency/Group/Organization Type	Services - Broadband Internet Service Providers Services - Narrowing the Digital Divide
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Market Analysis Non-Housing Community Development
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	BroadbandNow is a research organization which publishes data on the digital divide and impact of highspeed internet in society. It believes broadband internet should be available to all Americans and its mission is to help find and compare internet options with a goal to bring attention to underserved areas. The City consulted with the BroadbandNow website for broadband access and identified high speed internet providers in the City. There are five broadband internet providers offering residential services, and 100% of the City has broadband coverage.
26	Agency/Group/Organization	T Mobile Home Internet
	Agency/Group/Organization Type	Services - Broadband Internet Service Providers Services - Narrowing the Digital Divide

	What section of the Plan was addressed by Consultation?	Housing Need Assessment Market Analysis Non-Housing Community Development
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	The City continues to reach out to this service provider to discuss services for LMI households. This service provider offers discounts to LMI households. T Mobile Home Internet offers the Affordable Connectivity Program (ACP) to provide discounts for broadband services to LMI households.
27	Agency/Group/Organization	Frontier Communications
	Agency/Group/Organization Type	Services - Broadband Internet Service Providers Services - Narrowing the Digital Divide
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Market Analysis Non-Housing Community Development
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	The City continues to reach out to this service provider to discuss services for LMI households. This service provider offers discounts to LMI households. Frontier Communications offers the Affordable Connectivity Program (ACP) to provide discounts for broadband services to LMI households.
28	Agency/Group/Organization	Optimum
	Agency/Group/Organization Type	Services - Broadband Internet Service Providers Services - Narrowing the Digital Divide
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Market Analysis Non-Housing Community Development
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	The City continues to reach out to this service provider to discuss services for LMI households. This service provider offers discounts to LMI households. Optimum offers the Affordable Connectivity Program (ACP) to provide discounts for broadband services to LMI households.
29	Agency/Group/Organization	Ferguson Library

Agency/Group/Organization Type	Services - Broadband Internet Service Providers Services - Narrowing the Digital Divide
What section of the Plan was addressed by Consultation?	Housing Need Assessment Market Analysis Non-Housing Community Development
Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	The City continues to refer LMI residents to the library for high speed internet needs. The library has received funding from the federal Emergency Connectivity Fund (ECF) to provide hotspots, laptops and chromebooks to patrons who do not have access to the equipment or services sufficient to access the internet.

Identify any Agency Types not consulted and provide rationale for not consulting

All comments are welcome. There will be no agency types intentionally not consulted in the consultation and citizen participation process.

Other local/regional/state/federal planning efforts considered when preparing the Plan

Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
Continuum of Care	Opening Doors Fairfield County	Plans provide support for emergency shelters, supportive services, transitional housing
City of Stamford Master Plan	City of Stamford	Emphasis on providing housing choice for all income groups
Charter Oak Communities Major Agency 5 YR Plan	Housing Authority of the City of Stamford	Preservation and creation of LMI units
Proposed 2020 CDBG Action Plan	Town of Greenwich	Plans provide support for emergency shelters, supportive services, transitional housing
Stamford Lead Team	Stamford Environmental Health & Inspection Services	Plans support the Stamford Health Department in addressing housing units in which children have been identified as lead poisoned.

Table 3 – Other local / regional / federal planning efforts

AP-12 Participation – 91.105, 91.200(c)

1. Summary of citizen participation process/Efforts made to broaden citizen participation Summarize citizen participation process and how it impacted goal setting

The City of Stamford adheres closely to its HUD approved Citizen Participation Plan and encourages all citizens, and especially low- to moderate-income households and persons with special needs to participate in the planning process. In accordance with the Citizen Participation Plan, the City has developed a formal process for soliciting citizens' input in developing the Annual Action Plan. A public hearing and public comment review period allowed the public an opportunity to review the plan.

Below is a summary of details of the citizen participation outreach efforts made by the City. Citizen participation outreach efforts have been attached to this plan and uploaded in the citizen participation attachments link in the AD-26.

Citizen Participation Outreach

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL
1	Public Hearing	Non-targeted/broad community	On Tuesday, June 25, 2024, at 6:30 pm , during the Housing, Community Development and Social Services (HCD/SS) Committee of the Board of Representatives will hold a public hearing to accept verbal or written comments from citizens regarding the proposed AAP. More Information: http://www.boardofreps.org/calendar.aspx	A summary of comments will be included after the public hearing.	All comments are accepted	
2	Public Comment Period	Non-targeted/broad community	The proposed 2024 AAP will be available for review and comment from May 29, 2024 to June 28, 2024 via the City's Community Development website, https://www.stamfordct.gov/community-development-office , and from 9:00 am to 4:00 pm, Monday-Friday, at the Stamford Community Development Office (when open to the public), 888 Washington Blvd. 9 th Floor, Stamford, CT. Written comments on these proposed AAP should be submitted through the online form available at https://www.stamfordct.gov/community-development-office or to the Stamford Community Development Office at the above address.	A summary of comments will be provided after the conclusion of the public comment period.	All comments are accepted	

Table 4 – Citizen Participation Outreach

Expected Resources

AP-15 Expected Resources – 91.220(c)(1,2)

Introduction

In PY 2024, the City of Stamford anticipates it will receive HUD entitlement funds of \$956,320 in CDBG and \$462,019 in HOME funds. These funds are shown in the table below. The PY 2024 AAP is the fifth and final year of the Consolidated Plan, and there are no additional funds expected for the remainder of the Consolidated Plan period. The upcoming year will start a new five-year planning cycle.

Anticipated Resources

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
CDBG	public - federal	Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services	956,320	0	0	956,320	0	The PY 2024 AAP is the fifth and final year of the Consolidated Plan, and there are no more funds expected for the remainder of the Consolidated Plan period. The upcoming year will start a new five-year planning cycle.
HOME	public - federal	Acquisition Homebuyer assistance Homeowner rehab Multifamily rental new construction Multifamily rental rehab New construction for ownership TBRA	462,019	0	0	462,019	0	The PY 2024 AAP is the fifth and final year of the Consolidated Plan, and there are no more funds expected for the remainder of the Consolidated Plan period. The upcoming year will start a new five-year planning cycle.

Table 5 - Expected Resources – Priority Table

Explain how federal funds will leverage those additional resources (private, state and local funds), including a description of how matching requirements will be satisfied

The City of Stamford awards CDBG funds to local organizations through a competitive process and recommends applicants provide matching funds for their programs. CDBG funds are therefore only a portion of the overall funding that subrecipients receive, and they are encouraged to use CDBG funds to leverage other local and private resources.

The only matching funds required for the HUD funds requested are for the HOME Investment Partnerships Program. The City has exceeded the annual required match for these funds. Any additional match required under this Plan will be provided through City capital budget funds.

The City frequently works with developers to use HOME, HDF, IHZ and Linkage funds as necessary to complete major projects. Developers use HOME to fill gaps in a major project financing, for example, new unit construction with Low-Income housing Tax Credits. The advantage of designating units to remain affordable with HOME financing and rents provides developers some flexibility. The HOME program match requirement is satisfied with the use of Capital (HDF) funds. (Note: The City currently has a match well in excess of its required amount, and excess match is carried over to next Federal fiscal year.)

The City will attempt to leverage funds with its CDBG and HOME investments. HOME has been revised such that more projects may be entirely HOME funded. This is because regulations now require all other project funds to be in place at the time of HOME commitment. This timing is difficult to assure with larger projects progressing through state funding rounds for LIHTC and CHAMP monies.

If appropriate, describe publicly owned land or property located within the jurisdiction that may be used to address the needs identified in the plan

Previously, the City donated a parcel of land to 72 Franklin LLC (a wholly owned not-for-profit subsidiary of Inspirica, Inc.) to help facilitate the construction of 52 units of deeply affordable rental housing. Garden Homes is working with the City and Inspirica to develop deeply affordable housing on the eastern half of Stanley Court. Garden Homes and Inspirica have indicated they do not intend to seek HUD funds for the project.

Annual Goals and Objectives

AP-20 Annual Goals and Objectives

Goals Summary Information

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	1A Expand & Improve Public Infrastructure	2020	2024	Non-Housing Community Development	Qualifying LMI Census Tracts	Expand Improve Public Infrastructure & Facilities	CDBG: \$203,218	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 5000 Persons Assisted
2	1B Improve Access to Public Facilities	2020	2024	Non-Housing Community Development	Qualifying LMI Census Tracts	Expand Improve Public Infrastructure & Facilities	CDBG: \$203,218	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 5000 Persons Assisted
3	2A Increase Homeownership Opportunities	2020	2024	Affordable Housing	Qualifying LMI Census Tracts	Preserve & Develop Affordable Housing	HOME: \$154,006	Direct Financial Assistance to Homebuyers: 5 Households Assisted
4	2B Increase Affordable Rental Housing Opportunities	2020	2024	Affordable Housing	Qualifying LMI Census Tracts	Preserve & Develop Affordable Housing	CDBG: \$184,092 HOME: \$154,006	Rental units rehabilitated: 22 Household Housing Unit
5	2C Provide for Owner Occupied Housing Rehab	2020	2024	Affordable Housing	Qualifying LMI Census Tracts	Preserve & Develop Affordable Housing	CDBG: \$184,092 HOME: \$154,006	Homeowner Housing Rehabilitated: 10 Household Housing Unit

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
6	3A Provide Supportive Services for Special Needs	2020	2024	Non-Homeless Special Needs Non-Housing Community Development	Qualifying LMI Census Tracts	Public Services & Quality of Life Improvements	CDBG: \$181,701	Public service activities other than Low/Moderate Income Housing Benefit: 6000 Persons Assisted Homelessness Prevention: 40 Persons Assisted

Table 6 – Goals Summary

Goal Descriptions

1	Goal Name	1A Expand & Improve Public Infrastructure
	Goal Description	Expand public infrastructure through development activities for LMI persons and households. Activities can include adding ADA compliance for curb ramps and sidewalks, roadway expansion projects, and improve water and sewer systems.
2	Goal Name	1B Improve Access to Public Facilities
	Goal Description	Expand public facilities through development activities for LMI persons and households. Activities can include improved access to neighborhood and community centers and parks and recreation centers.
3	Goal Name	2A Increase Homeownership Opportunities
	Goal Description	Provide for increased homeownership opportunities for LMI households through direct financial assistance activities for LMI households.
4	Goal Name	2B Increase Affordable Rental Housing Opportunities
	Goal Description	Provide for multi-family housing rental development and rehabilitation. These activities will benefit LMI households.

5	Goal Name	2C Provide for Owner Occupied Housing Rehab
	Goal Description	Provide for owner occupied housing rehabilitation. These activities will benefit LMI households.
6	Goal Name	3A Provide Supportive Services for Special Needs
	Goal Description	The City will provide supportive services for special needs populations such as senior services for the elderly, services for persons with a disability, youth services and homeless services for persons experiencing homelessness.

Projects

AP-35 Projects – 91.220(d)

Introduction

The PY 2024 projects selected for funding are consistent with the Consolidated Plan and were presented by the community as critical. They have been approved by the City's Board of Representatives.

Projects

#	Project Name
1	CDBG: Administration
2	CDBG: Public Facilities & Infrastructure
3	CDBG: Housing Programs
4	CDBG: Public Services
5	HOME: Administration (10%)
6	HOME: CHDO Reserves (15%)
7	HOME: Non-CHDO Development Activities (75%)

Table 7 - Project Information

Describe the reasons for allocation priorities and any obstacles to addressing underserved needs

The City's Board of Representatives emphasizes funding programs/projects that benefit the most vulnerable: homeless and those at risk of homelessness. Neighborhood organizations are funded to provide programs and services to improve the quality of life for low-moderate income residents.

For CDBG, administration has a grant cap of 20% and public services is capped at 15%. The remaining funds are divided among the three other priorities of public facilities and infrastructure improvements, affordable housing programs and economic development opportunities. For HOME, administration has a grant cap of 10% and there is a CHDO set-aside of 15%. The remaining funds are allocated to non-CHDO development activities such as homeownership opportunities and rental development.

AP-38 Project Summary

Project Summary Information

1	Project Name	CDBG: Administration
	Target Area	Qualifying LMI Census Tracts
	Goals Supported	1A Expand and Improve Public Infrastructure 1B Improve Access to Public Facilities 2B Increase Affordable Rental Housing Opportunities 2C Provide for Owner Occupied Housing Rehab 3A Provide Supportive Services for Special Needs
	Needs Addressed	Expand and Improve Public Infrastructure and Facilities Preserve and Develop Affordable Housing Public Services and Quality of Life Improvements
	Funding	CDBG: \$191,264
	Description	Administration of the PY 2024 CDBG program.
	Target Date	6/30/2025
	Estimate the number and type of families that will benefit from the proposed activities	N/A
	Location Description	Citywide
	Planned Activities	Administration of the CDBG program (21A).
2	Project Name	CDBG: Public Facilities & Infrastructure
	Target Area	Qualifying LMI Census Tracts
	Goals Supported	1A Expand and Improve Public Infrastructure 1B Improve Access to Public Facilities
	Needs Addressed	Expand Improve Public Infrastructure and Facilities
	Funding	CDBG: \$329,930
	Description	Public facility activities will address site improvements to homeless shelters, childcare centers, mental health facilities, facilities for seniors and persons with disabilities, youth centers and other community centers.
	Target Date	6/30/2025

	Estimate the number and type of families that will benefit from the proposed activities	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 10,000 Persons Assisted
	Location Description	Citywide low/mod areas
	Planned Activities	Planned activities include neighborhood facilities (03E), parks (03F), streets (03K) and sidewalks (03L).
3	Project Name	CDBG: Housing Programs
	Target Area	Qualifying LMI Census Tracts
	Goals Supported	2B Increase Affordable Rental Housing Opportunities 2C Provide for Owner Occupied Housing Rehab
	Needs Addressed	Preserve and Develop Affordable Housing
	Funding	CDBG: \$291,678
	Description	CDBG funded housing activities will include multi-housing rehab and rehab of LMI owner-occupied housing.
	Target Date	6/30/2025
	Estimate the number and type of families that will benefit from the proposed activities	Rental units rehabilitated: 10 Household Housing Unit Homeowner Housing Rehabilitated: 10 LMI Household Housing Unit
	Location Description	Citywide
	Planned Activities	Planned activities include: Single-family housing rehab (14A) Multi-family unit rehab (14B)
4	Project Name	CDBG: Public Services
	Target Area	Qualifying LMI Census Tracts
	Goals Supported	3A Provide Supportive Services for Special Needs
	Needs Addressed	Public Services and Quality of Life Improvements
	Funding	CDBG: \$143,448

	Description	The projects selected for funding are consistent with the Consolidated Plan and serve low- to moderate-income individuals and households and special needs groups in the City. All activities listed below in the planned activities were presented by the community as critical. They have been approved by the City's Board of Representatives.
	Target Date	6/30/2025
	Estimate the number and type of families that will benefit from the proposed activities	Public service activities other than Low/Moderate Income Housing Benefit: 6000 Persons Assisted Homelessness Prevention: 40 Persons Assisted
	Location Description	Citywide
	Planned Activities	Planned public service activities include services for the elderly (05A), persons with a disability (05B), youth (05D) and homeless (03T).
5	Project Name	HOME: Administration (10%)
	Target Area	Qualifying LMI Census Tracts
	Goals Supported	2A Increase Homeownership Opportunities 2B Increase Affordable Rental Housing Opportunities
	Needs Addressed	Preserve and Develop Affordable Housing
	Funding	HOME: \$46,201
	Description	Staff and operating costs related to HOME funding.
	Target Date	6/30/2025
	Estimate the number and type of families that will benefit from the proposed activities	N/A
	Location Description	Citywide
	Planned Activities	Administration of the HOME program.
6	Project Name	HOME: CHDO Reserves (15%)
	Target Area	Qualifying LMI Census Tracts
	Goals Supported	2B Increase Affordable Rental Housing Opportunities
	Needs Addressed	Preserve and Develop Affordable Housing
	Funding	HOME: \$69,303

	Description	Funds reserved for CHDO housing development per regulation.
	Target Date	6/30/2025
	Estimate the number and type of families that will benefit from the proposed activities	Rental units rehabilitated: 2 Household Housing Unit
	Location Description	Citywide
	Planned Activities	Rental units rehabilitated: 2 LMI Household Housing Unit
7	Project Name	HOME: Non-CHDO Development Activities (75%)
	Target Area	Qualifying LMI Census Tracts
	Goals Supported	2A Increase Homeownership Opportunities 2B Increase Affordable Rental Housing Opportunities
	Needs Addressed	Preserve and Develop Affordable Housing
	Funding	HOME: \$346,515
	Description	Funds will be used for rental development/rehabilitation and down payment assistance.
	Target Date	6/30/2024
	Estimate the number and type of families that will benefit from the proposed activities	Rental units rehabilitated: 10 Household Housing Unit Direct Financial Assistance to Homebuyers: 5 Households Assisted
	Location Description	Citywide
	Planned Activities	Planned activities include: Rental units rehabilitated Direct Financial Assistance to LMI Homebuyers

AP-50 Geographic Distribution – 91.220(f)

Description of the geographic areas of the entitlement (including areas of low-income and minority concentration) where assistance will be directed

As per the Community Development Block Grant program requirements, priority for funding of activities goes to those that directly serve our low-moderate income, and/or benefit the census tracts in which they are concentrated (at least 51%). As CDBG funds continue to dwindle, these block group tracts will remain as target areas to maximize the impact of continued investments:

201.001, 201.002, 201.003, 209002, 210.001, 211.001, 213.001, 214.001, 214.002, 214.003, 214.004, 215.001, 215.002, 215.003, 215.004, 216.001, 216.002, 217.001, 217.002, 217.004, 218.011, 218.022, 218.023, 219.001, 219.002, 219.004, 220.001, 220.002, 221.001, 221.002, 221.003, 222.001, 222.002, 223.001, and 223.003.

The exact location of CDBG funded activities are determined through the CDBG budget development process, in which providers of services/housing/community development activities bring their projects to the City requesting funding.

A description of areas of low-income and minority concentration is located in the “discussion” at the end of this section.

Geographic Distribution

Target Area	Percentage of Funds
Qualifying LMI Census Tracts	100

Table 8 - Geographic Distribution

Rationale for the priorities for allocating investments geographically

The City has historically adopted this approach and believes that it maximizes the benefit to the CDBG eligible population.

The City will determine low/mod block group tracts through the CDBG Low/Mod Income Summary Data provided at the HUD Exchange site. As CDBG awards dwindle, funds will continue to be directed to areas that had previously benefited from CDBG funds. Future allocations will build upon previous impact/benefits of CDBG activity.

The identified census block group tracts within the jurisdiction that are considered low-moderate income can be found on the HUD Exchange website at: <https://www.hudexchange.info/programs/acs-low-mod-summary-data/>

Discussion

Race/Ethnic Minority Concentration

A “racial or ethnic concentration” is any census tract where a racial or ethnic minority group makes up 10 percent or more of that group’s citywide percentage as a whole. Data was taken from the 2018-2022 ACS 5-Year estimates, and this section was informed by the MA-50 of the Consolidated Plan. Due to the small sample size, only racial or ethnic groups that make up at least 1.0% of the City’s population were analyzed.

Black or African American: Black, non-Hispanic persons make up 18.5% of the Citywide population, and a census tract is considered a concentration if 28.5% of the population is part of this racial group. In Stamford, there is a clear racial concentration in the southwest portion of the City north of I-95.

Other Race: In Stamford, approximately 22.4% of the population identifies as a race other than the ones presented by the U.S. Census. A census tract is considered a concentration if 32.4% of the population is part of this racial group. There are two areas, near the downtown area that report a concentration of this group. One concentration is just west of the downtown area along I-95 and the other concentration is just southeast downtown along I-95.

Asian: In Stamford, approximately 8.3% of the population identifies as Asian. A census tract is considered a concentration if 18.3% of the population is part of this racial group. There is one census tract just north of the downtown area with a concentration (09001021602).

Hispanic: Hispanic persons make up 25.8% of the Citywide population, and a census tract is considered a concentration if 35.8% of the population is part of this racial group. In Stamford, there is a concentration of Hispanic households throughout the southern part of the City. There is a strong overlap between all three racial or ethnic minority groups with a concentration.

Native American/Alaskan Natives, Native Hawaiian/Pacific Islanders and multiracial groups did not present any areas of concentration in Stamford.

Low-Income Households Concentration

A “low-income concentration” is any census tract where the median household income for the tract is 80% or less than the median household income for the City of Stamford. According to the 2018-2022 ACS 5-Year Estimates, the Median Household Income in Stamford is \$89,797. A tract is considered to have a low-income concentration if the MHI is \$71,838 or less. The areas in Stamford with a concentration of low-income households are primarily the same tracts with a concentration of minority residents. These tracts run from just east of the downtown area to the western border of the City along I-95.

Affordable Housing

AP-55 Affordable Housing – 91.220(g)

Introduction

Below is a breakdown of estimated households to be assisted with affordable housing activities:

Direct Financial Assistance to Homebuyers: 5 Households Assisted

Rental units rehabilitated: 20 Household Housing Unit (10 CDBG / 10 HOME)

Rental units rehabilitated (CHDO): 2 Household Housing Unit

Homeowner Housing Rehabilitated: 10 Household Housing Unit

One Year Goals for the Number of Households to be Supported	
Homeless	0
Non-Homeless	37
Special-Needs	0
Total	37

Table 9 - One Year Goals for Affordable Housing by Support Requirement

One Year Goals for the Number of Households Supported Through	
Rental Assistance	0
The Production of New Units	5
Rehab of Existing Units	32
Acquisition of Existing Units	0
Total	37

Table 10 - One Year Goals for Affordable Housing by Support Type

Discussion

N/A

AP-60 Public Housing – 91.220(h)

Introduction

The Housing Authority of the City of Stamford, dba Charter Oak Communities (PHA), successfully rebranded itself and is a model agency for redevelopment and community creation. It is a progressive housing authority that is redefining assisted public housing through unique and comprehensive partnerships, creative funding models, and astute business practices coupled with a far-reaching vision. Its exemplary team of skilled professionals, alongside its many diverse partners, works hard to enhance life for its residents and community, setting the bar high and making Charter Oaks Communities one of the nation's leading innovators in residential services and housing.

Actions planned during the next year to address the needs to public housing

Charter Oak Communities' core functions include expanding affordable housing opportunities and promoting residents' socioeconomic progress and growth. It has an ambitious plan to undertake initiatives in areas such as public housing revitalization, communal urban agriculture, early childhood education, job/small business development, infrastructure improvements, community building and improved access to health care in partnership with Family Centers, the Boys & Girls Club, Stamford Hospital, the West Side Neighborhood Revitalization Zone, Fairgate Farm, the City of Stamford, Optimus and Community Health Centers. Many of these programs target the Vita Health and Wellness District and the greater West Side neighborhood (Census Tracts 214 and 215).

To meet the unique needs of public housing residents, Charter Oak Communities staff continue to be trained on their role in Section 504, Limited English Proficiency, and fair housing guidelines. The PHA will seek to enhance rent billing and collection activities to ensure they are accomplished in the most effective and cost-efficient way.

In PY 2024, The Stamford CDBG funds will be used to continue the ongoing efforts to rehabilitate public housing properties that are in critical need of upgrades. These upgrades will include essential improvements such as modernizing replacing appliances, enhancing safety measures, and ensuring compliance with current building codes.

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

Charter Oak Communities will continue to address the need for tenants to increase income through education, counseling and job training. The PHA will continue its efforts to assure that tenants participate in its family self-sufficiency program and to focus on household based economic development. In the family self-sufficiency program, families work with a program coordinator over a five-year period to establish and work toward goals aimed at achieving economic independence and family self-sufficiency. The PHA will deposit money into an interest-bearing savings account for program participants who have

an increase in income. The savings will be provided to the participants upon successful completion of the FSS Program.

Beginning with its 2000 HOPE VI grant, Charter Oak Communities has provided avenues for tenants to transition to home ownership. This has continued through redevelopment of the Fairfield Court units to Fairgate. Charter Oak Communities established building councils for each of its developments. These councils review proposed funding of projects that impact their buildings. They were vital in several building renovation projects which involved temporary and permanent relocation of tenants. Now these councils are used as sounding boards for the development of requests for uses of PHA capital funds and refinancing.

Charter Oak Communities will seek to develop a plan to create an endowment for supportive service programs administered within the various affordable housing programs. Resident-led initiatives including public housing resident-to-resident community service programs have and will continue to engage residents in activities which improve the quality of life for all residents. Residents become "stakeholders" and participate in public housing revitalization, from planning through operations which strengthens the growth and development of the community.

If the PHA is designated as troubled, describe the manner in which financial assistance will be provided or other assistance

N/A. The PHA is not designated as troubled.

Discussion

The City has undertaken a number of studies in the past years which focus on the Vita Health and Wellness area - specifically a West Side Traffic Study and a Stillwater Corridor Master Plan - looking at roadways, complete streets, walking paths, bike pathways, intersections, traffic calming, safety, lighting, beautification and how to improve connections to downtown and the intermodal transit facility and local recreational facilities. In the coming years, as the recommendations of the various plans are implemented, the foundation laid by Charter Oak Communities will position the properties in its portfolio as a model for redevelopment.

AP-65 Homeless and Other Special Needs Activities – 91.220(i)

Introduction

The City of Stamford has long participated in the area Continuum of Care (CoC) by having City staff serve on its committees and Executive Board. With the merger of neighboring CoCs and the creation of the Fairfield County CoC, also known as Opening Doors Fairfield County (ODFC), the City remains involved and maintains a seat on the ODFC Coordinating Committee. ODFC strives to integrate resources serving a homeless/sheltered community that moves up and down the I-95 corridor. The City has actively supported homeless and special needs populations housing with CDBG and HOME funds. HOME funds have helped create new transitional housing units, and CDBG supports day service programs to homeless, life coaching for women and families that are homeless, and improvements to shelter facilities.

Describe the jurisdictions one-year goals and actions for reducing and ending homelessness including:

Reaching out to homeless persons (especially unsheltered persons) and assessing their individual needs

The City supports the specialists in homelessness, (Inspirica, Inc., Pacific House, Inc., ODFC) in their efforts to conduct annual homeless counts such as the Point-in-Time (PIT) Count, and especially to establish a "one point" universal intake for homeless, which assesses needs and begins the shelter and counselor/resource referral process. CDBG public service funds have been provided to the City's Veteran Resource Center and Inspirica, two organizations that provide outreach to homeless persons and assess their needs to provide necessary services and make appropriate referrals.

Addressing the emergency shelter and transitional housing needs of homeless persons

The City works closely with Stamford's shelters to assure their building facilities are maintained and improved to meet the needs of the sheltered, and that transitional housing opportunities are available. Previous HOME awards assisted construction of new transitional units (Fairfield Commons, 38 Ann St., 23 Spruce St.).

CDBG funds have been used to make improvements to the Domestic Violence Crisis Center (DVCC) Safe House. DVCC offers domestic violence victims and their children safe, temporary housing and on-site access to all victim services. Residents in the safe houses are provided with meals, clothing, safety planning and transportation. Whether for a few days or a few weeks, DVCC's safe houses offer a safe place where healing and recovery can take place.

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

The City has assisted in creation and renovation of the transitional housing units critical to offering stable housing opportunities to those who are homeless while providing counseling for development of skills necessary to obtain permanent housing. The City, through HOME and its zoning policies has created Below Market Rate housing which provides options for an individuals and families seeking permanent housing in a high cost housing market. The City has supported applications by ODFC for rapid rehousing funds. The City with CDBG funds public service counseling programs which work with those in danger of homelessness and persons experiencing homelessness in finding suitable housing alternatives. The Kids in Crisis Safe Haven for Kids program addresses the mental health of homeless youth and provides support services and a crisis hotline.

Other programs that ODFC offers to help homeless individuals and families transition from homelessness to stable housing are listed below.

Community Care Teams (CCT) partner in improving the quality and access to care for the most vulnerable citizens. Providers identify gaps in services and identify solutions and resources for clients. Participants meet weekly, and include direct service providers from: shelters, community health clinics, housing authorities, substance abuse treatment facilities, behavioral health services, acute-care hospitals, and staff from municipal, state, and federal governmental agencies.

The ODFC Rapid Rehousing (RRH) program provides necessary financial assistance and services to help individuals and families avoid returning to homelessness. The three components of RRH include assistance to finding housing and housing placement, rental assistance, and case management. The CT Department of Housing funds the CT RRH Program for the Fairfield County CAN region. RRH rental assistance is also funded through HUD Continuum of Care and ESG programming. Veterans are also assisted with RRH programming through the U.S. Department of Veteran Affairs Supportive Services for Veteran Families Program (SSVF).

The ODFC Housing First Collaborative (HFC) program immediately moves homeless individuals from the streets or shelters into their own housing units and provides time-limited case management support. This evidence-based national best practice is founded on the principle that one's first and primary need is to obtain stable housing. HFC utilizes an adapted Critical Time Intervention (CTI) model for providing time-limited case management support.

The ODFC Permanent Supportive Housing (PSH) provides affordable housing and comprehensive case

management services to clients who are at-risk of chronic homelessness. Clients live in affordable housing and receive case management services to ensure long-term housing stability.

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

The City continues to prioritize assistance for LMI individuals and families to prevent homelessness, especially those who are being discharged from systems of care and are most at-risk of returning to homelessness. The City has played a crucial role in creating and rehabilitating transitional housing units, which are essential for providing stable housing opportunities to homeless individuals. These units also offer counseling services to help residents develop the skills needed to secure and maintain permanent housing. Additionally, the City has supported and endorsed funding applications for Continuum of Care members.

Through the HOME program and Zoning Regulation Section 7.4, the City has created the Below Market Rate Program, which is an inclusionary zoning program that provides options for an individual or family seeking permanent housing in a high-cost housing market. Funds provided as a fee-in-lieu of the on-site affordable housing requirements (typically at the 50% AMI level) have typically been used to develop deeply affordable housing to serve families seeking stable housing. To date the program has created over 1,000 units of deed restricted affordable housing.

The CDBG program funds public services, such as counseling programs, to help those at risk of homelessness and those who are homeless find suitable housing alternatives. The Inspirica Women's Housing Program provides emergency support services to help clients avoid homelessness. Kids in Crisis, addresses the mental health of at-risk youth. Person to Person offers a critical needs assistance program that provides food, clothing, diapers, infant layettes, housewares, and emergency financial assistance. CDBG also funds programs that provide access to food banks and medical prescription and dental services, freeing up funds for rent.

Discussion

The City of Stamford is committed to funding services and projects that meet the needs of the most vulnerable - the homeless, children needing mental health services and protection, families and children that need housing, and agencies that work with these vulnerable populations. The City is also committed to continuing its work with ODFC and maintain its membership in the CoC.

AP-75 Barriers to affordable housing – 91.220(j)

Introduction:

The City's latest update to its Impediments to Fair Housing Analysis and Plan indicated the following actions should be taken to overcome impediments:

- Increase home ownership opportunities for low-moderate income buyers;
- Improve quality and number of affordable rental units to provide choice for low-moderate income renters;
- Improve access to housing opportunities for low-moderate income people.

The barriers mentioned above include the financial resources required to create and subsidize deeply affordable rental housing, and the income/rent limits imposed by federal programs in high-cost housing areas. Additionally, there is a need to address access to credit for families and individuals disproportionately affected by housing problems.

Actions it planned to remove or ameliorate the negative effects of public policies that serve as barriers to affordable housing such as land use controls, tax policies affecting land, zoning ordinances, building codes, fees and charges, growth limitations, and policies affecting the return on residential investment

The City is dedicated to affirmatively furthering fair housing, which includes referring applicants to counseling agencies to help them successfully obtain conventional loans. The City collaborates with realtors and banks to ensure fair and equal access to conventional financing. Additionally, the City supports LIHTC projects, which provide housing for very low-income individuals.

The City has an inclusionary housing zoning regulation to encourage the creation of housing accessible to individuals and families at lower income levels. Stamford's inclusionary zoning program requires a minimum share of new multifamily units to include permanently affordable rental units, mostly targeted at households earning 50% of AMI.

In 2021, Stamford developed a Housing Affordability Plan to evaluate conditions in Stamford currently and prioritize strategies for the future. The Housing Affordability Plan builds on existing practices to help the City evaluate how to plan for housing to meet a broader range of needs. The plan recommends strategies that the City should focus on to address existing barriers in the housing market and meet housing needs.

The City will use the HOME purchase assistance program to provide financing to low-income tenants to become homeowners. The program allows a low-moderate income borrower to purchase a unit they can afford anywhere within Stamford. In the Stamford housing market, any unit held for a period of time has historically gained value. A family assisted with a down-payment loan is often on the way to building

wealth through equity that will enable even greater housing choice with their next purchase. HOME funds will also be used to keep units affordable and safe through rehabilitation and new construction.

Discussion:

The City continues to develop its own source of subsidy for affordable units, primarily through the Zoning regulation and the Commercial Linkage programs. However, as written, rents for units developed or assisted cannot be considered "deeply affordable." The regulation undergoes periodic updates. The need for a review and opportunity to incentivize the creation of "deeply affordable" units can be considered at that time. During the past year the Board of Representatives HCD/SS committee has held a series of meetings with members of the Land Use Bureau and Zoning Board Members to better understand the modifications that could be made to the Zoning regulation.

AP-85 Other Actions – 91.220(k)

Introduction:

The Community Development Office of the City of Stamford continues to be responsible for all CDBG and HOME funded activities. The City, operating within the guidelines for the CDBG and HOME program set by its Board of Representatives, addresses the needs of the elderly and low-income persons who face severe housing problems. The City maintains relationships with its non-profit housing providers and service agencies to help tenants be successful at keeping their homes.

Actions planned to address obstacles to meeting underserved needs

The main obstacle to meeting underserved needs is the continued lack of available funds, and the needs in the community continue to remain great. Community Development provides information about funding opportunities to local community agencies to help them secure other public and private sources of funds. Funded programs include services for persons with a disability, the elderly, the homeless and victims of domestic violence.

The City has typically provided housing rehab for LMI households in need of housing repairs. The City has had an "open, rolling" application for this type of assistance. The maximum available per unit is \$20,000, however, repairs in these units often exceed the amount of HOME funds available, or more commonly the value of the property exceeds the maximum HOME property value.

Actions planned to foster and maintain affordable housing

The City will continue to work with Charter Oak Communities, the local public housing authority, as it rehabilitates and renews its oldest developments. City Capital and Linkage funds are often provided to further these efforts. Applications for CDBG assistance with capital improvements at affordable elderly housing sites are considered favorably. CDBG and HOME funds are also provided to maintain and preserve the stock of affordable housing. These housing development activities are administered through Community Development's Housing Development Loan program.

The City meets regularly with Charter Oak Communities, New Neighborhoods, Inc., Mutual Housing Association, Neighborhood Housing Services, Pacific House and Inspirica to assess the needs to maintain affordable housing among the various need groups. The Housing, Community Development and Social Services Committee of the Board of Representatives will continue to review the City's Inclusionary Housing Zoning Regulation to identify text changes that could encourage the development of a wider range of affordable housing options.

Actions planned to reduce lead-based paint hazards

City programs are enhanced by the services available through its own municipal departments and via its

linkages with various community agencies and programs. Using a coordinated system reciprocal referrals and information sharing with Building, Fire, Social Services and Zoning/Land-use, Stamford has built a community network able to address housing related needs.

The City of Stamford Health Department services include prenatal and well childcare, school and public health nursing, and the Women, Infant, and Children (WIC) nutrition program. As part of the child case management the Environmental Inspections Division confers with pediatricians, clinics and human service agencies to track the progress of each child with lead poisoning. The Health Department has knowledgeable staff that can assist with any questions regarding lead. The Health Department Laboratory Division provides finger screening on Mondays and Wednesdays. The Health Department is also responsible for investigating cases of lead poisoned children six years of age and younger with lead levels 10ug/dl or greater. The investigation entails an interview with the family, visual inspection of the premises, and paint chip, soil, and/or dust samples obtained for analysis. If the results indicate lead is present in the home, the owner will be responsible for abating the lead using a certified lead abatement contractor to remove the lead to assure proper removal and clean-up. The local health department sends a reminder test letter to parents/guardians for capillary results 5-9 µg/ dl. The level of concern has now been lowered from 10 µg/dl to 5 µg/dl.

Any CDBG and HOME funded projects (residential) in pre-1978 structures are tested for lead-based paint hazards. If lead is present the sub-recipient must ensure that lead is abated in accordance with the regulations of the Environmental Protection Agency and in compliance with the Residential Lead Based Paint Hazard Reduction Act of 1992 (Title X) and subsequent changes.

Actions planned to reduce the number of poverty-level families

The activities identified in this PY 2024 AAP will work directly to reduce the number of poverty level families in Stamford. CDBG funds are directed towards public services that help to improve the quality of life for residents, public improvements help to revitalize low/mod areas and affordable housing programs help assist LMI households maintain and preserve their housing that might otherwise lead to situations where they become at-risk of homelessness. Liberation Programs provides treatment and prevention services for substance use and mental health disorders with a goal of helping individuals and families overcome addiction in order to restore their lives and ultimately strengthen the community. New Covenant Center is focused on hunger prevention and social services for a better life. The facility in Stamford provides expanded basic need services to our guests. By creating a safe, warm and compassionate environment, it takes the first steps toward empowering men, women and children to reach their full potential and regain their dignity and self-respect. Continued counseling and training of those with low income who reside in Charter Oak Communities associated developments will assist these

families in increasing their income.

Actions planned to develop institutional structure

The City partners with non-profit and other public agencies to implement the proposed community development plan. The City evaluates each activity, and the agencies and organizations, to assess the strengths and gaps in the delivery system. ODFC is working to create a more efficient way of dealing with the requirements that have grown up around the McKinney programs that fund the homeless shelter associated organizations. The City works with ODFC, Pacific House and Inspirica to achieve a single point of entry into the homeless referral system. The Community Development Office has a good working relationship with the Social Services Department and Health Department. The HCD/SS Committee will continue to request presentations from Land Use and Zoning as we seek to modify local Zoning to encourage the development of "deeply affordable" housing.

Actions planned to enhance coordination between public and private housing and social service agencies

Each year the City funds community services providers that meet the highest needs identified in the City of Stamford. The City's Community Development Office is engaged with funded sub-recipients and not only monitors progress of the program but also provides technical assistance when needed.

As the emphasis on housing the homeless has increased, there has been a natural growth of cooperation between public and private operators of affordable housing to create workable support/counseling for those obtaining transitional and permanent housing. The City supports these efforts and urges those with newly funded HOME projects to consider establishing relationships with agencies such as Laurel House to assist tenants to become successful in their new housing. Charter Oak Communities has a vibrant partnership with Family Centers, Inc. to connect residents with social services. The City will continue to work with Charter Oak Communities on the Vita Health and Wellness district.

Program Specific Requirements

AP-90 Program Specific Requirements – 91.220(I)(1,2,4)

Introduction:

This section describes the program specific requirements for the CDBG and HOME program.

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

Projects planned with all CDBG funds expected to be available during the year are identified in the Projects Table. The following identifies program income that is available for use that is included in projects to be carried out.

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

Other CDBG Requirements

1. The amount of urgent need activities	0
2. The estimated percentage of CDBG funds that will be used for activities that benefit persons of low and moderate income. Overall Benefit - A consecutive period of one, two or three years may be used to determine that a minimum overall benefit of 70% of CDBG funds is used to benefit persons of low and moderate income. Specify the years covered that include this Annual Action Plan.	100.00%

**HOME Investment Partnership Program (HOME)
Reference 24 CFR 91.220(l)(2)**

1. A description of other forms of investment being used beyond those identified in Section 92.205 is as follows:

The City will not be using other forms of investment described in 92.205, for example, loan guarantee, refinance or interest subsidies. All assistance to homebuyers or developers are in the form of secured mortgage loans, with deferred payment. No Tenant Based Rental Assistance will occur.

2. A description of the guidelines that will be used for resale or recapture of HOME funds when used for homebuyer activities as required in 92.254, is as follows:

Recapture/Resale Issues.

The HOME Down-payment Assistance Program provides up to a \$20,000 deferred payment loan at zero percent which is payable upon resale or in 30 years, whichever occurs first. The down payment loan is always a direct subsidy enabling the homebuyer to purchase the property, and the loan is subject to “recapture”, that is repayment in the event of sale or if the buyer does not use the unit as his/her principal residence for the duration of the affordability period. When recaptured, the entire loan must be repaid.

The City of Stamford requires that participants in the HOME down payment program execute mortgage deeds that reflect the above: they require HOME units to be the owner’s principal residence for the life of the loan. In addition, the HOME Loan Note and Mortgage require that should they sell the unit, the HOME funds are recaptured via repayment of the loan.

If a down payment loan recipient sells his/her home

- For less than what is owed to all lenders, then the balance of the down payment loan that cannot be met with any sale proceeds is forgiven.
- For more than what is owed to all lenders, then the down payment loan must be paid in full from net proceeds.

Since the HOME loans must be repaid, there is no requirement for resale restrictions. The HUD maximum allowable purchase/home value for existing units now in effect is affecting this program. Historically, the selection of units is poor. In 2010-2011, the City instituted underwriting standards that require HOME down-payment loan recipients to meet a minimum requirement for their housing cost to income ratio. HOME projects, existing and new, will be monitored for compliance

regarding income, rents, and condition as described in the City's Strategic Plan.

The City will not use forms of investment other than those described in 92.205.

For information regarding affirmative marketing and minority outreach, see this Action Plan, Barriers to Affordable Housing section.

HOME projects, existing and new, will be monitored for compliance regarding income, rents, and condition as described in the City's Strategic Plan.

3. A description of the guidelines for resale or recapture that ensures the affordability of units acquired with HOME funds? See 24 CFR 92.254(a)(4) are as follows:

The Stamford Community Development Office received HUD approval of its form of note and mortgage for a HOME Down-payment Loan Program. These documents contain the required recapture provision in event of sale of the unit, or in event of several instances of default (for example, moving from the unit and renting it out). In recapture, the entire loan must be repaid. The Adopt-A-House Program worked with the City to draft the proposed documents which were approved by HUD in 1997. In the event of sale by foreclosure, the owner is required to repay HOME funds only to the extent that net proceeds permit. (Net proceeds are defined in HOME regulations as "the sales price minus superior loan repayment (other than HOME funds) and any closing costs." (92.254(a)(5)(ii)(A)) If voluntary short sale is proposed by the owner of a HOME assisted unit, the City may approve the short sale or may exercise its right of first refusal and arrange a purchase by a HOME qualified buyer at a market price. This will assure that the unit will remain affordable. Otherwise, with recapture of funds, money is used to make additional HOME qualifying "down-payments".

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

N/A. This will not be done.

5. If applicable to a planned HOME TBRA activity, a description of the preference for persons with special needs or disabilities. (See 24 CFR 92.209(c)(2)(i) and CFR 91.220(l)(2)(vii)).

Not applicable. The City does not plan to fund TBRA activities with FY 2024 HOME program funds.

6. If applicable to a planned HOME TBRA activity, a description of how the preference for a specific category of individuals with disabilities (e.g. persons with HIV/AIDS or chronic mental illness) will narrow the gap in benefits and the preference is needed to narrow the gap in benefits and services

received by such persons. (See 24 CFR 92.209(c)(2)(ii) and 91.220(l)(2)(vii)).

Not applicable. The City does not plan to fund TBRA activities with FY 2024 HOME program funds.

- 7. If applicable, a description of any preference or limitation for rental housing projects. (See 24 CFR 92.253(d)(3) and CFR 91.220(l)(2)(vii)). Note: Preferences cannot be administered in a manner that limits the opportunities of persons on any basis prohibited by the laws listed under 24 CFR 5.105(a).**

In accordance with 24 CFR 92.253(d)(3), an owner of a rental housing project assisted with HOME funds must comply with the affirmative marketing requirements established by the City of Stamford pursuant to 24 CFR 92.351(a). The owner of the rental housing project must adopt and follow written tenant selection policies and criteria, which include that it may give a preference to a particular segment of the population if permitted in its written agreement with the City such as persons with a disability or other special needs. However; at this time there is no limit to eligibility or preference given to any particular segment of the population with rental housing projects funded by the City's HOME program funds such as persons with a disability or those with other special needs. HOME funds must however target low- to moderate-income households. The City of Stamford does not discriminate and provides equal access to all eligible households.