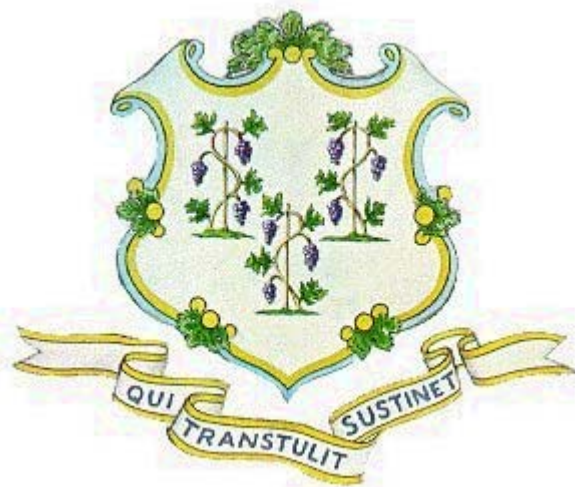


**State of Connecticut**

**2006-2007 Action Plan**  
for  
**Housing and Community Development**



Submitted to the  
**U.S. Department of Housing and Urban Development**  
by the **State of Connecticut**

**STATE OF CONNECTICUT**  
**2006 Action Plan for Housing & Community Development**

**Executive Summary**

**Overview:**

The Annual Action Plan updates the State of Connecticut's 2005-2009 Consolidated Plan for Housing and Community Development (ConPlan), a five year plan addressing Connecticut's housing and community development needs. The state submits the Plan to the U.S. Department of Housing and Urban Development (HUD) in order to be eligible to apply for funds under the Small Cities Community Development Block Grant (CDBG), HOME Investment Partnerships (HOME), Emergency Shelter Grant (ESG), and Housing Opportunities for Persons with Aids (HOPWA) programs. This Annual Action Plan covers the program year from July 1, 2006 to June 30, 2007.

This Action Plan provides a plan for expending FFY 2006 funds in the following programs:

• HOME Investment Partnerships (HOME)	\$ 12,512,547
• Small Cities Community Development Block Grant (CDBG)	\$ 13,645,095
• Emergency Shelter Grants (ESG)	\$ 1,134,627
• Housing Opportunities for Persons with AIDS (HOPWA)	\$ 253,000

**This document provides information on:**

- **Resources:** funding sources available to address the state's needs and objectives;
- **Activities:** method for distributing funds for activities that address needs and objectives;
- **Geographic Distribution:** geographic areas to which the state will direct assistance;
- **Homeless and Special Needs Activities:** plans to address homelessness and assist persons with special needs;
- **Other Actions:** strategies to address underserved populations, foster and maintain affordable housing, remove barriers, and assist families in poverty;
- **Summary of Public Comments:** comments made on the Action Plan and DECD responses;
- **Applications for Assistance:** HUD Form 424 for the CDBG, HOME, ESG, and HOPWA programs; and
- **Certifications:** general and program specific certifications as required by HUD.

**Performance:**

The Consolidated Plan is a five-year strategic plan that describes the housing needs of low and moderate-income residents, examines the housing market, outlines strategies to meet the needs and lists all resources available to implement those strategies, and outlines goals, objectives and measures. The ConPlan sets a unified vision, long-term strategies and short-term action steps to meet priority needs. The Annual Action Plan is the annual implementation plan for the goals, objectives and strategies outlined in the state's ConPlan. The Action Plan describes how the state will use allocated funds for the four federal programs governed by the ConPlan for a given fiscal year. The PER is the annual report to HUD that details the progress the department has made in carrying out the ConPlan and the annual action plan. The PER describes resources made

available, the investment of those resources, the amount and source of leveraged funds, the source and use of program income, geographic distribution and location of investments, the number of families and persons assisted and actions taken to affirmatively further fair housing. The PER is due within 90 days after the end of the state's program year (July 1, 2005 - June 30, 2006). Performance data for the 2005-2006-program year will not be available until the submission of the state's 2005 PER on September 30, 2006. Once submitted to HUD, the 2005 PER will be posted to the DECD Website.

**Summary of PER Data for state fiscal year 2005-2006:**

- HOME Investment Partnerships (HOME) \$ 13,439,519
- Small Cities Community Development Block Grant (CDBG) \$ 15,107,297
- Emergency Shelter Grants (ESG) \$ 1,138,691
- Housing Opportunities for Persons with AIDS (HOPWA) \$ 242,000

**Objectives and Outcomes:**

The 2005-06 Action Plan outlined the department's proposed accomplishments for the 2005-2006 program year based on the performance measurement system presented in the 2005-09 Consolidated Plan. The information is contained in the Goals and Objectives Matrix.

In this document, we have outlined the department's proposed accomplishments for the 2006-07 program year based on the performance measurement system presented in the 2005-09 Consolidated Plan and the new HUD Outcome Performance Measurement System for Community Planning and Development Formula Grant Programs. The actual outcomes for proposed accomplishments appearing in this Action Plan will be reported on in the Performance Evaluation Report (PER) for the year 2006-2007.

**Citizen Participation:**

Connecticut held five (5) public hearings during the months of September and November in order to gather input for the development of the 2006-2007 Action Plan and, subsequently, to receive comments on the draft of that document. Connecticut published the notices for the hearings in seven (7) area newspapers. These public hearings were spread out geographically so that persons from any area of the state could attend to provide their views on either the development of or the written draft of this plan.

There were a total of ten (10) responses to the plan, either through actual presence and testimony at one of the hearings or through provision of written comments. Five (5) individuals attended one hearing including one (1) state representative, two (2) town managers, one (1) community development coordinator and one (1) consultant. The state representative also provided written comments as follow-up. Five (5) persons provided written comment only including one (1) state senator, one (1) town planning director, one (1) director of a statewide coalition of small towns and two (2) managers of specific town agencies involved in housing and community development.

**During the public hearings, three (3) issues were discussed:**

- Online application: request for online availability of Small Cities CDBG application

- 10% match requirement instituted by the state: request to eliminate the matching grant requirement for CDBG (for more information on the match issue, see page A 15-16 of the Action Plan)
- 10% match requirement: request to consider alternative ways of determining who must meet the match, for example, a score of 85 on the adjusted grand list for a particular town as an exception from the match requirement

**Through written public comment, three (3) issues were discussed:**

- Open funding application process: request to continue the open funding application process for CDBG
- 10% match requirement: elimination of the matching grant requirement for CDBG
- Goals: an opinion that the goal to support four (4) single-family moderate rehabilitation projects each year (with up to 100 units each) in CDBG eligible communities is too low

**DECD's response to both the comments from the public hearings and the written comments provided are as follows:**

- **Online application:** the department is presently investigating online application possibilities as part of its charge to create a single development application with CHFA; there is a likelihood that other applications (including CDBG) will follow.
- **Open application process:** The department is continuing this process.
- **10% match requirement:** DECD is asking for a minimum local contribution of 10% and this may include "in-kind" contributions. This match does not apply to housing, economic development or planning projects. It also does not apply to rural communities with populations of 3,000 or less, classified as economically disadvantaged under any state or federal authority. Applicants may request a waiver and the Commissioner of DECD, at his sole discretion, may approve such a waiver. After careful consideration of all comments, a review of Connecticut's current fiscal situation and the policies of other states on administering CDBG, and in consultation with the Office of Policy and Management, DECD has decided to retain the 10% match for the program year 2006-2007.

In addition to the above efforts outlined, the notices and a copy of the draft plan were posted on the DECD website. Copies of past action plans and the 2005-2009 Consolidated Plan for Housing and Community Development are also available on the DECD website.

DECD notified all chief elected officials of every Connecticut municipality and the state's Regional Planning Organizations about the dates, times and locations of all Action Plan public hearings and of the timing of the commentary period. The department directed all parties to the DECD website for a copy of the draft plan and 2005-2009 Consolidated Plan. The department also submitted the draft Action Plan and public hearing/public commentary schedules to members of the state legislature who sit on committees of cognizance over matters related to housing, economic and community development and state finances.

**Governor's Working Group on Affordable Housing:**

Another major effort is underway in Connecticut that will, in effect, broaden the input on the development of both the ConPlan and related action plans. The Governor of

Connecticut called for the formation of a Working Group on Affordable Housing in April of 2005. The Department of Economic and Community Development (DECD) and the Office of Policy and Management (OPM) co-chair this group that includes twelve (12) other state agencies.

In addition, the Working Group has established an Advisory Committee consisting of public and private groups with experience or expertise in housing advocacy, housing authority operations, administration of federal housing programs, community social and health services, housing law and legal aid, municipal government, regional planning, real estate sales, banking and mortgage finance, non-profit and for-profit housing developers, and housing management and housing construction.

The charge to the Working Group, in concert with the Advisory Committee, is to identify barriers to the creation of affordable housing on both the state and local levels. The group will then provide recommendations to the Governor on making the best use of Connecticut's limited resources to create and preserve quality affordable housing and will develop a plan to better integrate affordable housing with economic development, transportation, social services and public facilities. The Working Group has taken the first step in this process by commissioning a survey of hundreds of persons involved in the housing arena to get their feedback on a variety of questions related to creating and preserving affordable housing in Connecticut. For more information on the Governor's Working Group on Affordable Housing, see page 2 of this plan.

**Other Outreach:**

There are other ways in which DECD gathers information and input on what Connecticut needs to consider when developing affordable housing. There are at least 60 state boards and commissions that the Commissioner and various staff (on behalf of the Commissioner) attend. These groups focus on economic development, mental health and other social service issues, transportation, etc. and the department is invited to attend because of the link to housing and community development. The exchange of ideas and feedback on the state's efforts around affordable housing (for example, supportive housing) as well as innovative thinking and programming are often a result of the connections with these groups.

In addition, the DECD Small Cities staff completed significant outreach during the period of July 1, 2005 through June 30, 2006. They did hundreds of site visits to municipalities and presented quarterly workshops for about 50 municipalities per workshop. They also produced two newsletters that were mailed to every Small Cities grantee.

DECD continues to explore new and better ways to involve others, particularly citizens, in the development of both the ConPlan and the annual Action Plan. Areas currently under review are expanded use of the Internet and a possible survey of citizens in communities across Connecticut.

**STATE OF CONNECTICUT**  
**2006 Action Plan for Housing & Community Development**

**I. INTRODUCTION**

The Annual Action Plan updates the State of Connecticut's 2005-2009 Consolidated Plan for Housing and Community Development (ConPlan), a five year plan addressing Connecticut's housing and community development needs. The state submits the Plan to the U.S. Department of Housing and Urban Development (HUD) in order to be eligible to apply for funds under the Small Cities Community Development Block Grant (CDBG), HOME Investment Partnerships (HOME), Emergency Shelter Grant (ESG), and Housing Opportunities for Persons with Aids (HOPWA) programs. This Annual Action Plan covers the program year from July 1, 2006 to June 30, 2007.

References to sections of the ConPlan are made throughout this document. Not all of these sections are duplicated here. Copies of the ConPlan are available from the Connecticut Department of Economic and Community Development (DECD), Compliance Office and Planning/Program Support. A copy of both the 2005-2009 Consolidated Plan and this Action Plan can be viewed or downloaded by visiting DECD's web site at [www.DECD.org](http://www.DECD.org).

The activities, programs and resources discussed in this Plan will be administered by various agencies including the Departments of Economic and Community Development, Social Services, Mental Health and Addiction Services, and the Connecticut Housing Finance Authority.

**The Action Plan includes** the following sections in accordance with federal regulations:

- **Resources:** funding sources available to address the state's needs and objectives;
- **Activities:** method for distributing funds for activities that address needs and objectives;
- **Geographic Distribution:** geographic areas to which the state will direct assistance;
- **Homeless and Special Needs Activities:** plans to address homelessness and assist persons with special needs;
- **Other Actions:** strategies to address underserved populations, foster and maintain affordable housing, remove barriers, and assist families in poverty;
- **Summary of Public Comments:** comments made on the Action Plan and DECD responses;
- **Applications for Assistance:** HUD Form 424 for the CDBG, HOME, ESG, and HOPWA programs; and
- **Certifications:** general and program specific certifications as required by HUD.

**II. CITIZEN PARTICIPATION**

In accordance with Connecticut's 2005-2009 Consolidated Plan for Housing and Community Development, the Department of Economic and Community Development (DECD) solicited public input in developing the 2006-2007 Action Plan. Two public hearings to gather public input and concerns on housing and community development needs throughout the state were conducted by DECD on September 20, 2005 in Rocky Hill and September 22, 2005 in Norwich.

DECD also solicited input on the draft Action Plan through a 30-day public comment period from November 15, 2005 to December 15, 2005. The department invited citizen participation at three public hearings held on November 21, 2005 in Rocky Hill, November 22, 2005 in Hamden and November 23, 2005 in Coventry. The notices and a copy of the draft plan were posted on the DECD website. Copies of DECD's past action plans and the 2005-2009 Consolidated Plan for Housing and Community Development are also available on the DECD website.

DECD notified all chief elected officials of every Connecticut municipality and the state's Regional Planning Organizations about the dates, times and locations of the Action Plan public hearings and of the timing of the commentary period. The department directed all parties to the DECD website for a copy of the draft plan and 2005-2009 Consolidated Plan. The department also submitted the draft Action Plan and public hearing/public commentary schedules to members of the state legislature who sit on committees of cognizance over matters related to housing, economic and community development and state finances.

Comments received during the public hearing and public commentary processes and DECD's response to said comments appear in Attachment A beginning on page A-1.

### **The Governor's Working Group on Affordable Housing:**

As noted in the executive summary to this plan, there is another major effort underway in Connecticut that will, through its work, broaden the input on the development of both the ConPlan and related action plans. In April of 2005, the Governor of Connecticut called for the development of a Working Group on Affordable Housing. The co-chairs of the group are the Department of Economic and Community Development (DECD) and the Office of Policy and Management (OPM). There are twelve (12) other state agency members of the group including the Connecticut Housing Finance Authority (CHFA), the Department of Children and Families (DCF), the Department of Consumer Protection (DCP), the Department of Environmental Protection (DEP), the Department of Mental Health and Addiction Services (DMHAS), the Department of Mental Retardation (DMR), the Department of Corrections (DOC), the Department of Labor (DOL), the Department of Transportation (DOT), the Department of Social Services (DSS), the Office for Workforce Competitiveness (OWC) and the State Historical Preservation Office (SHPO).

In addition and at the Governor's request, the Working Group has established an Advisory Committee consisting of public and private groups with experience or expertise in housing advocacy, housing authority operations, administration of federal housing programs, community social and health services, housing law and legal aid, municipal government, regional planning, real estate sales, banking and mortgage finance, non-profit and for-profit housing developers, and housing management and housing construction.

The charge to the Working Group, in concert with the Advisory Committee, is to identify barriers to the creation of affordable housing on both the state and local levels. The group will then provide recommendations to the Governor on making the best use of Connecticut's limited resources to create and preserve quality affordable housing and

will develop a plan to better integrate affordable housing with economic development, transportation, social services and public facilities.

The Working Group has taken the first step in this process by commissioning a survey of hundreds of persons involved in some aspect of housing to get their feedback on a variety of questions related to creating and preserving affordable housing in Connecticut. In addition to the survey, the Working Group is reviewing current and previous initiatives and studies from other groups including reports from past Blue Ribbon Commissions and individual presentations from community groups including one from the Partnership for Strong Communities. All of this information described above will assist the department in setting future goals around developing affordable housing in Connecticut and in determining what kind of housing is needed in various locations throughout the state. The Working Group will be exploring recommendations for the Governor around administrative/policy changes, legislative changes and inter-agency agreements.

### **Other Outreach:**

There are other ways in which DECD gathers information and input on what Connecticut needs to consider when developing affordable housing. There are at least 60 state boards and commissions that the Commissioner and various staff (on behalf of the Commissioner) attend. These groups focus on economic development, mental health and other social service issues, transportation, etc. and the department is invited to attend because of the link to housing and community development. The exchange of ideas and feedback on the state's efforts around affordable housing (for example, supportive housing) as well as innovative thinking and programming are often a result of the connections with these groups.

In addition, the DECD Small Cities staff completed significant outreach during the period of July 1, 2005 through June 30, 2006. They did 223 site visits to municipalities for project monitoring, outreach visits and to provide technical assistance. Through these visits, staff gathered ideas for future planning around both affordable housing and community development projects. Staff also produced two newsletters that were mailed out to every Small Cities grantee. During this same timeframe, Small Cities staff presented four (4) workshops with an average attendance of fifty (50) or more municipalities. The workshops were held over the course of the year and included the following:

- July 2005: Environmental Review
- October 2005: Small Cities Application Workshop
- February 2006: Economic Development
- June 2006: Financial Training

For some time, the department has been aware of the difficulty in reaching citizens who actually use the various kinds of affordable housing available in Connecticut. We have had limited success in drawing people to the public hearings we sponsor even though they are well advertised in advance and spread out across the state. We understand that transportation and other factors may be the reason for lack of attendance. DECD will be looking at ways to expand the use of the Internet as a method to increase input into the ConPlan and the action plans. We will also be looking at whether or not a survey of residents in Connecticut, particularly in public housing, would be a viable,



reliable way of getting input on what Connecticut can do to create additional, better affordable housing.

### III. FEDERAL REQUIREMENTS

#### A. Resources:

Federal and state resources, which will be used during this Action Plan time frame to address the needs and strategies identified in the ConPlan, are found in the sections on specific programs in this report. This Action Plan provides a plan for expending FFY 2006 funds in the following programs:

HOME Investment Partnerships (HOME)	\$	12,512,547
Small Cities Community Development Block Grant (CDBG)	\$	13,645,095
Emergency Shelter Grants (ESG)	\$	1,134,627
Housing Opportunities for Persons with AIDS (HOPWA)	\$	253,000

\*Please note that the funding represented for each program is subject to congressional action, which could affect an increase, reduction or elimination of the funding amounts noted.

A chart of state and federal resources that details those funds that are available to support housing and community development activities is included later in this document. The state cannot anticipate what other public or private funds may be available to support the programs, activities and strategies discussed here, however, the state will make maximum use of any such resources as they become available. The state is committed to making the most efficient and effective use of all resources. Connecticut's 2005-2009 Consolidated Plan outlines how the state plans to leverage CDBG, HOME, ESG and HOPWA funds against other sources of funding.

A notice of funding availability will be posted on the DECD website upon funding notification from HUD.

#### B. Activities:

The state's methods of distributing funds and carrying out activities funded by HUD and other federal programs are described in the program-specific sections that follow. In recognition of the crucial need for access to funding for housing and community development projects throughout the year, the state makes both HOME and Small Cities CDBG funds available on a year-round basis through its "open " application process. Please refer to the HOME and Small Cities CDBG sections of this document for more detail on these activities.

#### C. Geographic Distribution:

All communities of the state are eligible for funding from both state and federal programs, in accordance with program requirements. Funds under both the HOME and Small Cities CDBG programs will be available to all eligible communities. Communities with greater needs may be given higher priority.

**D. Homeless and Other Special Needs Populations:**

Homeless and other special need populations are described in detail in the Needs Assessment and the Homelessness sections of the ConPlan. Strategies to address these needs are listed in the Strategies section of the ConPlan. A general description of state and federal resources can be found in the Institutional Structure section of the ConPlan.

**E. Other Actions:**

The strategies to address underserved populations, to foster and maintain affordable housing, to remove barriers and to assist families at or below poverty level are discussed in the Strategies section of the ConPlan. A general description of state and federal resources can be found in the Institutional Structure section of the ConPlan.

1. The Connecticut Housing Finance Authority (CHFA) will review the Federal Low Income Housing Tax Credit Allocation Plan to assure consistency with state policies described in this Action Plan.
2. Redevelopment of state assisted housing stock will be considered in the awarding of Housing Tax Credits.
3. The State of Connecticut will continue to address the reduction of lead-based paint hazards in a manner consistent with current activities at the Department of Economic and Community Development (DECD). These include but are not limited to the following:
  - a. The state will continue its efforts to reduce the hazards of lead-based paint through a coordinated outreach effort to provide lead-based paint hazard reduction information to rehabilitation and construction contractors. In addition, CDBG funds used to support homeownership rehabilitation loans will be increased to absorb the costs associated with the lead-based paint hazard reduction methods requirements.
  - b. Further, the state will continue its association with selected contractors to administer a comprehensive rehabilitation effort through a one-stop process for housing rehabilitation activities including but not limited to lead-based paint hazard reduction, code violations and energy conservation improvements. Funding continues to be available from the state-funded Energy Conservation Loan Program and the Removal of Hazardous Materials from Residential Structures Program.

The State of Connecticut intends to abide by HUD's requirements for notification, evaluation and reduction of lead-based paint hazards in federally owned residential property and housing receiving federal assistance (Lead Safe Housing Regulation at 24 CFR Part 35).

#### IV. PROGRAM ACTIVITIES

##### A. HOME Program:

The state will continue its effort to strengthen the abilities of state and local government to expand and preserve its supply of decent, safe, sanitary, and affordable housing with the use of federal fiscal year (FFY) 2006 HOME funds. All HOME assisted rental and home ownership units must meet all program guidelines for income eligibility.

The state will invest in the production of affordable housing through new construction or rehabilitation only when it determines that the units produced will remain affordable for the minimum required time period (15 years) under the HOME Program. DECD, at its' discretion, may extend the affordability period beyond the minimum required by the HOME program. If HOME funds are used for homebuyers, the state will abide by the guidelines for resale and recapture as required in Section 92.254 of the HOME Investment Partnerships Program Consolidated Final Rule.

Pursuant to Sec. 92.218-92.222 of the HOME Final Rule, the state Participating Jurisdiction (PJ) incurs a 25% matching obligation for the HOME funds it expends. The PJ will use its General Fund housing appropriations as its match.

The state is also seeking to expand access to affordable housing through the utilization of partnerships with stakeholders and other funding organizations that leverage non-state resources for development or preservation of affordable housing.

Geographically, HOME funds will be available to all 169 communities. The department will accept applications for all HOME eligible activities with the exception of Tenant Based Rental Assistance (TBRA).

1. **FFY 2006 Resource Allocation Plan for the Home Program:** The federal fiscal year 2006 HUD allocation to the Department of Economic and Community Development for HOME is expected to be \$12,512,547. HOME funds are subject to availability from the federal government. If changes to this distribution become necessary, procedures outlined below will be observed in making those changes.

<b>FFY 2006 Allocation</b>	<b>\$12,512,547</b>
State Administration (10%)	\$ 1,251,255
ADMIN. SUBTOTAL	\$ 1,251,255
CHDO Set-aside (15% of Allocation)	\$ 1,876,882
CHDO SUBTOTAL	\$ 1,876,882
American Dream Downpayment Initiative Federal Fiscal Year 2006 allocation	\$ 311,717

ADDI SUBTOTAL	\$ 311,717
Program Funds Available	\$ 9,072,693
<b>TOTAL</b>	<b>\$ 12,512,547</b>

2. **Reprogramming of Funds:** During the fiscal year, DECD may recapture funds from previous fiscal years from:

- Non-performing grantees;
- Grantee's underutilized funds; and
- Program income generated by grantees.

Funds may be reallocated during the program year based on demand and/or emergency situations. In the event that additional funds are allocated that affect Connecticut's initial allocation and/or are recaptured from other states and reallocated to Connecticut during the program year, these funds will be distributed in accordance with the Action Plan guidelines in effect as of the date of reallocation.

The Department of Economic and Community Development proposes to use ten percent (10%) of its annual HOME allocation for program administration. The remaining funds are proposed to be allocated for HOME eligible activities. A minimum of fifteen percent (15%) of the annual allocation will be set-aside for Community Housing Development Organizations (CHDO) as required by federal law.

3. **American Dream Downpayment Initiative (ADDI) Program:** DECD will make available \$ 311,717 in ADDI funding under the HOME program. The American Dream Downpayment Initiative, part of HUD's expanded effort to promote homeownership, will help underserved households (including residents and tenants of public and manufactured housing and other families assisted by public housing agencies) obtain the resources to meet upfront downpayment and closing costs, the most significant obstacles to homeownership among lower income groups. Homeownership plays a vital role in creating strong communities by giving families a stake in their neighborhoods and helping them to build wealth by undertaking and maintaining homeownership.

The American Dream Downpayment Initiative will be administered under DECD's HOME Investment Partnerships Program. DECD will administer this program in conjunction with all applicable HOME rules and ADDI rules as they are promulgated including the requirements of HUD's Interim Rule for ADDI. American Dream Downpayment Initiative funds must benefit low-income families who are first-time homebuyers with downpayment and closing cost assistance of up to six percent (6%) of the purchase price of a single family housing unit or \$10,000, whichever is greater. Pre and/or post purchase housing counseling for homebuyers is also required.

To meet the goals of this initiative, DECD will encourage applications for homeownership development projects aimed at the ADDI target population

as well as applications from organizations with existing downpayment programs seeking to expand their funding capability. In accordance with the ADDI Interim Rule, DECD will require applicants to submit, as part of the application process, their plan for conducting targeted outreach to residents and tenants of public and manufactured housing and to other families assisted by public housing agencies. ADDI recipients are obligated to fulfill all of the requirements of HUD's Interim Rule for the ADDI, which will be included in the application packages.

The department will not be establishing a new DECD administered consumer-based product associated with this initiative; it therefore will not be accepting requests from individuals interested in downpayment assistance. Individuals interested in downpayment assistance should contact an existing downpayment assistance provider.

4. **Debt Refinancing:** For non-profit developers, the department may also utilize HOME funds to refinance existing debt or to retire bridge financing provided the following conditions are met:
  - a. **Refinancing of Existing Permanent Debt** (applies only to nonprofit developers): DECD may permit the use of HOME funds toward the cost of fully or partially refinancing an existing permanent mortgage loan on rental property provided, in the opinion of the Commissioner, the following conditions are met:
    - The rehabilitation of the housing must be the primary eligible activity. Therefore, the cost of the rehabilitation of the housing must equal or exceed \$25,000 per HOME-assisted unit and the total cost of the refinancing paid for with HOME funds may not exceed 50% of the cost of the eligible HOME rehabilitation activities;
    - A review of the management practices of the applicant must demonstrate that the proposed rehabilitation is not the result of dis-investment in the property by any entity involved in the application for HOME funds;
    - A review of the proposed operating budget for the project must demonstrate that both the cost of the refinancing and the needed rehabilitation of the project can be met and still result in the affordability of the units to HOME-eligible tenants for a period of 15 years or the term of the refinancing, whichever is longer;
    - When compared to the refinancing terms being proposed, the loan being refinanced must have:
      - An interest rate higher than the proposed refinancing; or
      - A repayment term that is longer than the proposed refinancing; or
      - A lump-sum repayment requirement (a balloon payment).
    - Priority may be given to projects located in a neighborhood identified in a neighborhood revitalization strategy under 24 CFR 91.215(e)(2), a federally-designated Empowerment Zone or Enterprise Community, or a state-designated Neighborhood Revitalization Zone; and

- The activity does not involve the refinancing of a multifamily loan made or insured by any state or federal program, including CDBG.
- b. **Grants or Loans to Pay Off a Bridge Loan** (applies only to nonprofit developers): DECD may permit the use of HOME funds for the repayment of all or part of any reasonable bridge loans secured by a nonprofit developer to pay for project costs necessarily incurred prior to the availability of HOME or other financing. Such expenses may include the cost of acquisition of real property, real estate options and feasibility studies which, in the opinion of the Commissioner, were necessary to the development of the project. Any services paid for with such a bridge loan that will be repaid with HOME funds must be for HOME-eligible expenses. The applicant must have secured all services in accordance with a DECD-approved procurement plan.
5. **Resale and Recapture Guidelines** (in compliance with 24 CFR Part 92.254 (a)(5), Qualification as Affordable Housing/Homeownership): The department will require that a deed restriction or restrictive covenant be placed on each property assisted with HOME funds to enforce the affordability requirements. For homeownership projects, the department may utilize HOME and/or ADDI funds to assist homebuyers provided the following resale and recapture requirements are met:

**Affordability Period:** the minimum affordability period is established by HUD based on the amount of HOME financial assistance in each unit; however, the applicant may request or DECD may require a longer affordability period in neighborhoods that are experiencing rapidly appreciating housing costs. A neighborhood with “rapidly appreciating housing cost” is one where, at the time of application, housing costs are increasing at a rate beyond the rate for housing costs contained in the Consumer Price Index.

**Direct Subsidy:** or buyer’s subsidy consists of any financial assistance that reduces the purchase price from fair market to an affordable price, or otherwise subsidizes the purchase (e.g., downpayment or closing cost assistance, subordinate financing).

**Development Subsidy:** or developer’s subsidy is provided to the developer and is the difference between the cost to develop housing and the market price. While the subsidy does not go directly to the homeowner, it helps make development of an affordable home feasible.

**Affordability Enforcement:** for HOME-assisted ownership projects, HOME rules require that a resale and/or subsidy recapture restriction be applied to the units. If the sole HOME financial assistance to a unit is a developer’s subsidy (not combined with a buyer’s subsidy), then the only type of restriction permitted is a resale restriction.

**Resale Restrictions:** a resale restriction requires the resale of the unit to HOME-qualified homebuyers throughout its affordability period. Successful

use of this restriction requires imposition of a deed restriction or a restrictive covenant at the initial sale and diligent oversight and assistance at the time of resale. Because of this obligation, DECD normally will not permit resale restrictions unless the sponsor has a long-standing history in owning and/or managing affordable housing. A "long-standing history" means at least ten (10) years.

**Subsidy Recapture:** a subsidy recapture requires that the resale of the unit during the affordability period trigger a repayment of the HOME subsidy that the buyer received when they originally purchased the unit. Subsidy recapture may be structured so that it is reduced using the following formula:  $\text{Yearly Reduction} = 1/\#$  where # equals the number of years of affordability required. Thus, if the affordability period is 15 years, each year the amount of subsidy subject to recapture decreases by 1/15. However, in no event shall the subsidy recapture calculation result in a repayment greater than that which would result in calculating the net sales proceeds with a pro-rata share to the owner based on the original purchase.

**Choice of Enforcement Method:** if the sponsor is administering a program with buyer subsidies and it has a long-standing history in owning and managing affordable housing; it may select to use one or the other form of enforcement. However, the specific method must be selected prior to the start of the program. If the sponsor does not have the required long-standing experience and its program will utilize buyer subsidies, it must choose the subsidy recapture method of enforcement.

6. **Application Process for HOME Program:** DECD will continue to accept applications for the HOME program under the "open" application process. Applications will be accepted on a continuing basis year-round, for as long as funds continue to be available. The department reserves the right to cease accepting applications at any time that available funds have been committed. Applications will be rejected at that time, and applicants will be warned to proceed at their own risk.

a. **Application Process:**

- All requests for funding must be submitted directly to the department's Office of Housing Finance (OHF);
- Prospective applicants may be invited to complete a pre-application in accordance with the department's administration of the HOME program;
- Staff will review the pre-application and any attached materials to determine if the project/activity meets minimum program eligibility and threshold requirements. Minimum program eligibility and threshold requirements include applicant's experience with the HOME program and/or other public financing and current status of existing contracts with the department. Pre-applications that do not meet basic eligibility and threshold review requirements will be rejected for funding;
- Staff will invite an application if the project/activity is determined to be eligible and the threshold requirements have been addressed;

- All applications, and any attached materials throughout the application process, may be reviewed and evaluated by a project review committee under the direction of the Office of Housing Finance's Community Development Administrator; and
  - Applications will be considered against financial and qualitative issues, including but not limited to:
    - Financial feasibility;
    - Reasonableness;
    - Financial leveraging;
    - Social and economic impact on the neighborhood, community, region and state as defined in the strategies and priorities outlined in the ConPlan;
    - Number of current open contracts;
    - Current projects' expenditure rates; and
    - Prior audit or monitoring performance.
- b. **Program Eligibility and Threshold Requirements:**
- Eligible applicants: as defined by HUD program regulations;
  - Applicant capacity: previous experience with the HOME program and/or other public financing, quality of work product, efficiency and effectiveness in project management;
  - Number of open contracts with the DECD: applicants with 3 or more open contracts (not pending closeout within six months of application), regardless of funding source, will be rejected;
  - Eligible activity: only those activities eligible under the appropriate federal acts will be funded;
  - Statement of compliance with all program requirements: applicants must be in compliance with all existing DECD assistance agreements and cannot be in default under any CHFA or HUD-administered program (Waiver provision available in extraordinary circumstances);
  - Consistency with Consolidated Plan: applicant must identify how the project is consistent with the goals and strategies of the ConPlan; and
  - Fair Housing: applicant must provide a certification/demonstration of compliance with Fair Housing guidelines.
- c. **Application Evaluation and Approval Process:** DECD staff will conduct due diligence and evaluate eligible applications using the evaluation criteria described herein. Depending on the nature of the proposed activity, site inspections may be conducted by DECD staff. An evaluation of the site's feasibility will be completed and considered as part of the final review. Final review will also include, but not be limited to, the following:
- The applicant's expenditure rates on open contracts;
  - Readiness to proceed;
  - Compliance with DECD underwriting guidelines;
  - The extent to which the proposed activity supports the goals of neighborhood, local, regional and state plans for housing and community development; and



- The ability of the applicant to demonstrate that they will be able to secure firm financial commitments from other funding sources.
- d. **Recommendations for Approval:** will be made from the Community Development Administrator to the Commissioner. Final recommendations will be based on the overall quality of the application as well as fund availability. Approved applicants will receive notification from the Commissioner's office. If the application is not approved, the Community Development Administrator will advise the applicant of the rejection in writing and identify the reasons for the rejection.

**B. Small Cities Community Development Block Grant (CDBG) Program:**

The department will accept applications for all Small Cities eligible activities. In the event that additional funds are allocated that affect Connecticut's initial allocation and/or are recaptured from other states and reallocated to Connecticut during the program year, these funds will be distributed in accordance with the Action Plan guidelines in effect as of the date of reallocation.

1. **FFY 2006 Resource Allocation Plan For Small Cities CDBG Program:** the federal fiscal year 2006 HUD allocation to the Department of Economic and Community Development for the Small Cities CDBG Program is expected to be approximately \$13,645,095. CDBG funds are subject to availability from the federal government. If changes to this distribution become necessary, procedures outlined below will be observed in making those changes.

<b>FFY 2006 Allocation</b>	<b>\$13,645,095</b>
State Administration (2%)	\$ 272,902
(Additional State Admin) (\$100,000)	\$ 100,000
Technical Assistance (1%)	\$ 136,451
ADMIN SUBTOTAL	\$ 509,353
Program Funds Available	<u>\$14,154,448</u>
 <b>TOTAL</b>	 <b>\$13,645,095</b>

2. **Reprogramming of Funds:** during the fiscal year, DECD may recapture funds from previous fiscal years from:
- Non-performing grantees;
  - Grantee's underutilized funds; and
  - Program income generated by grantees.

Funds may be reallocated during the program year based on demand and/or emergency situations.

The Department of Economic and Community Development proposes to use one percent (1%) of its annual CDBG allocation for technical assistance activities including staff technical assistance training sessions and handbooks for use by local governments.

3. **Eligible Activities:** communities funded under the Small Cities program can undertake a wide range of activities in the areas of housing, economic development, community facilities, and public services. This section contains a listing of the specific eligible activities as defined by HUD and also contains a review of expressly ineligible activities that Small Cities grantees are in *no* circumstances allowed to carry out. Applicants should also remember that, in addition to being eligible as defined in this section, each activity must meet one of three national objectives.

Eligible activities include:

- Acquisition of real property
- Relocation assistance
- Public facilities and improvements
- Code Enforcement
- Clearance, rehabilitation, reconstruction, and construction of buildings
- Architectural barrier removal (commonly called ADA Improvements)
- Loss of rental income
- Disposition of real property
- Economic development assistance to for-profit business
- Micro-enterprise assistance
- Public services
- Planning and capacity building
- Program administrative costs
- Energy efficiency/conservation
- Technical assistance
- Housing services

In general, any activity *not* specifically authorized in the previous section will be considered to be ineligible for assistance under the Small Cities CDBG Program.

Ineligible activities include:

- New construction of permanent residential structures
- Buildings for the general conduct of government (except ADA improvements)
- Political activities
- Income payments
- Faith-based assistance used for primarily religious activities

4. **The Housing and Community Development Act of 1974 (as amended):** the primary objective is the development of viable urban communities by providing decent housing, a suitable living environment and expanding economic opportunities, principally for families or persons of low and moderate income.

In order to meet these objectives, the federal government has established three national objectives for the Small Cities program. Every activity must meet one of the three national objectives. The three national objectives are:

- To benefit low and moderate-income families;
- To aid in the prevention or elimination of slums or blight;
- To alleviate existing conditions that pose a serious and immediate threat to the health or welfare of the community (Urgent Need).

Meeting a national objective through one of the following:

Low and moderate-income persons:

- Area benefit (e.g., streets and sidewalks)
- Limited clientele (e.g., seniors or handicapped persons)
- Direct benefit (e.g., housing rehab and job creation)

Slum and blight:

- Area basis
- Spot slum and blight

Urgent need:

- Sudden and unexpected
- Threat to the health and welfare of the community
- Occurred within 18 months
- No other funds available

5. **Planning Grants:** planning grants must be utilized to build local administrative capacity and to develop or manage Small Cities Community Development Block Grants. Federal and state policy requires that all “planning only” grants develop plans that, if implemented, would meet the low and moderate-income national objective. To meet this requirement, planning grants must be for a specific CDBG eligible activity.

Requests for funding will be approved on first come, first served basis. Towns are limited to one planning grant request per program year in an amount not to exceed \$50,000. Total awards for planning grants will not exceed 2% of the state’s annual allocation.

6. **Economic Development Applications:** the Small Cities CDBG Program will award grants under the economic development category to eligible local governments or multi-jurisdictional applicants to assist businesses in meeting the national objective for low and moderate-income benefit through job creation or retention.

Grants will be awarded based on the following determinations: (1) whether Small Cities CDBG funding is appropriate and (2) whether the type and level of Small Cities CDBG assistance is reasonable in relation to the achieved public benefit, and does not unduly enrich the business.

7. **Community Revitalization Strategies:** in 1996, HUD established criteria for allowing states to approve a locally determined strategy for revitalizing an area that is among the community’s most distressed. In order to provide

some incentive for grantees to undertake such revitalization, the CDBG regulations provide certain benefits for the use of CDBG funds in such an area. DECD will apply the same criteria to communities eligible for Small Cities CDBG.

- a. A community that is interested in seeking approval of a community revitalization strategy (CRS) must submit a request to DECD prior to and separate from an application for a Small Cities CDBG grant.

**Once a CRS is approved, the community is eligible for the following incentives:**

- **Job Creation/Retention as Low/Moderate Income Area**  
**Benefit:** job creation/retention activities undertaken pursuant to the CRS may be qualified as meeting area benefit requirements, thus eliminating the need for a business to track the income of the persons that take or are considered for such jobs;
  - **Aggregation of Housing Units:** units assisted pursuant to the CRS may be considered to be part of a single structure for purposes of applying the low and moderate-income national objective criteria, thus providing greater flexibility to carry out housing programs that revitalize neighborhoods;
  - **Aggregate Public Benefit Standard Exemption:** Economic development activities carried out under the strategy may be exempt from the aggregate public benefit standards, thus increasing a community's flexibility for program design as well as reducing its record-keeping requirements; and
  - **Public Service Cap Exemption:** Public services carried out pursuant to the CRS by a Community Based Development Organization will be exempt from the public service project-funding cap.
- b. A community's strategy must be designed to provide for the economic empowerment of low and moderate-income residents of a particular area that is among the community's most distressed. It must also provide for other long-term improvements within a reasonable period of time.

**Therefore, the CRS must clearly describe how it meets the following criteria:**

- **Boundaries:** the community must identify the neighborhood's boundaries for which the CRS applies. All areas within the boundaries must be contiguous;
- **Demographic Criteria:** the designated area must be a primarily residential area that contains at least fifty-one percent (51%) low and moderate-income residents. However, a community may not utilize the area benefit presumption authorized by 24 CFR 570.483(e)(5)(i) or the aggregation of housing units authorized by 24CFR 570.483 (e)(5)(ii) unless it meets the additional

demographic criteria outlined in 24 CFR 570.483(b)(1)(v). Communities that intend to utilize the area benefit presumption or the aggregation of housing units must provide DECD with the census data needed to support the LMI percentage and poverty rate in the designated area;

- **Consultation:** The community must describe how the CRS was developed in consultation with the area's stakeholders, including residents, owners/operators of businesses and financial institutions, nonprofits, and community groups that are in or serve the neighborhood;
- **Assessment:** the CRS must include an assessment of the economic conditions of the area and an examination of the opportunities for economic development improvement and the problems likely to be encountered;
- **Economic Empowerment:** there must be a realistic development strategy and implementation plan to promote the area's economic progress focusing on activities to create meaningful jobs for the unemployed low and moderate income residents of the area as well as activities to promote the substantial revitalization of the area; and
- **Performance Measures:** the CRS must identify the results to be achieved, expressing them in terms that are readily measurable, in the form of benchmarks.

In order to avoid an unnecessary burden for the community in describing its CRS, the community may refer to specific portions of other documents that the community must provide to DECD. Additional data may be required if the referenced documents do not contain sufficient data to determine that each of the criteria has been met.

A community with an approved Neighborhood Revitalization Zone pursuant to Public Act 95-340 may use the strategic plan developed for the NRZ as the CRS as long as any additional information required by DECD is also provided.

8. **Section 108 Loans:** The Section 108 Loan Guarantee Program is an extension of the federal Small Cities CDBG program and provides a source of financing for community development projects in accordance with Section 108 of the Housing and Community Development Act of 1974, as amended. The program is designed to finance large-scale projects that address public needs or stimulate economic development.

Guaranteed by the U.S. Department of Housing and Urban Development and backed by the full faith and credit of the United States, Section 108 notes are issued to investors through private underwriters. The Section 108 funds are offered to localities in the form of loans that must be repaid in full. The state pledge of future Small Cities CDBG funds serves as one source of security. All projects will be required to provide additional security and demonstrate that the 108 borrowing can be paid back. All Section 108

projects must fulfill at least one of the federal Small Cities CDBG national objectives.

Applications will be approved on an "open" application basis. The awards will be made for projects qualifying on non-competitive criteria until funding authority is less than pending pre-applications. When and if demand exceeds supply, the statewide Small Cities CDBG evaluation criteria will be employed.

Proposals for Section 108 loans will be accepted by the state throughout the year and will be evaluated on project merits by a review team. Localities will be requested to complete a pre-application, which will enable the state to determine that the proposal meets federal eligibility and feasibility criteria. Proposals will be accepted for housing rehabilitation, housing development site preparation and infrastructure and economic development. The amount of funds committed to a particular project will be based on financial need and public benefit relative to risk.

**Key program elements for the Section 108 Loan Guarantee Program:**

- DECD statewide assistance is limited to \$14 million or no more than \$1,500,000 principal and interest payments annually;
- DECD minimum amount per project is \$500,000;
- DECD maximum loan guarantee per applicant or per project will not exceed \$4 million;
- The maximum loan term will be 20 years;
- Loans will be capped at 75% to 80% Section 108 loan to collateral value pledged;
- Repayment feasibility must be reasonably assured;
- Each project must demonstrate at least 10% equity participation;
- Section 108 loan funds cannot constitute more than 90% of total project costs;
- For economic development projects, the cost per full time equivalent job cannot exceed \$35,000 in Section 108 funds (all permanent jobs);
- For economic development projects, Section 108 assistance is limited to a maximum of \$350 per low and moderate-income resident served;
- The interest rates charged will be pegged to cost of funds, which track treasury rates; and
- For DECD housing rehabilitation projects, maximum assistance will be capped according to HOME program guidelines.

9. **Application Process for Small Cities CDBG Program:** DECD will continue to accept applications for the Small Cities CDBG program under the "open" application process. Applications will be accepted on a continuing basis year-round for as long as funds continue to be available. The department reserves the right to cease accepting applications at any time that available funds have been committed.

- a. **Application Process:**
- Prospective applicants must complete a pre-application in accordance with the department's administration of the program. All pre-applications must be submitted directly to the Office of Municipal Development's Program Representative for the community in which the project/activity will be carried out;
  - Staff will review the pre-application and any attached materials to determine if the project/activity meets minimum program eligibility and threshold requirements. Staff are available to provide technical assistance regarding eligibility requirements and funding opportunities;
  - Staff will invite an application if the project/activity is determined to be eligible and the threshold requirements have been addressed or the prospective applicant will be advised of deficiencies. Projects that do not meet basic eligibility and threshold requirements will be rejected for funding and will receive a letter outlining the reason(s); and
  - The Community Development Administrator will review staff recommendations to submit applications if the project is determined to be eligible. The following criteria will be considered:
    - Social and economic impact on the neighborhood, community, region and state as defined in the strategies and priorities outlined in the ConPlan; and
    - Applicant's outstanding obligations, number of open grants, current project expenditure rates, prior audit or monitoring performance.
- b. **Program Eligibility and Threshold Requirements:**
- Eligible applicants: as defined by HUD program regulations;
  - Eligible activity: only those activities eligible under the appropriate federal acts will be funded;
  - Statement of compliance with all program requirements: applicants must be in compliance with all existing DECD assistance agreements and cannot be in default under any CHFA or HUD-administered program (Waiver provision available in extraordinary circumstances);
  - Consistency with the Consolidated Plan: applicant must identify how the project is consistent with the goals and strategies of the ConPlan;
  - Fair Housing: applicant must provide certification/demonstration of compliance with Fair Housing guidelines;
  - National Objective: each proposed activity must meet at least one national objective and the national objective claim must be fully supported. In some cases, the department should pre-approve the approach for meeting the national objective;
  - Citizen Participation: applicant must provide certification of compliance with citizen participation criteria;
  - Match Requirement: applicant must provide a minimum local contribution of 10% (from a non-state source) of the amount

- requested from DECD. Housing, economic development and “planning only” grants are not subject to the 10% local contribution. Rural communities with populations of 3,000 or less, classified as economically disadvantaged under any state or federal authority, are not subject to the match requirement; and
- Waiver of the 10% local contribution: may be requested at the time of application. The Commissioner, at his sole discretion, may approve or disapprove the appeal.
- c. **Application Evaluation and Approval Process:** DECD staff will conduct due diligence and evaluate eligible applications using the evaluation criteria described herein. Depending on the nature of the proposed activity, site inspections may be conducted by DECD staff. An evaluation of the site’s feasibility will be completed and considered as part of the final review. Staff will make a recommendation for approval to the Commissioner. Staff review will include the following:
- Applicant outstanding obligations (i.e. findings & concerns);
  - The number of current open contracts;
  - The applicant’s expenditure rates on open contracts;
  - Readiness to proceed; and
  - The extent to which the proposed activity supports the goals of neighborhood, local, regional, and state plans for housing and community development.
- d. **Final Recommendations:** based on the overall quality of the application and compliance with the threshold and evaluation requirements. The ability of the applicant to demonstrate that they will be able to secure firm financial commitments from other funding sources will also be a determining factor. Approved applicants will receive notification from the Commissioner's office. If the application is not approved, the Community Development Administrator will advise the applicant of the rejection in writing.

**Evaluation Criteria for HOME and Small Cities CDBG Programs:**

The following are categories of evaluation criteria and descriptions of factors that will be considered within each category.

1. **Need and Marketability:** the project must meet one or more of the priorities as outlined in the ConPlan. This category will consider: the overall housing and community development needs of the site; the neighborhood, the community, the municipality and the region in which the activity is proposed; the documented need for the specific activity proposed; the extent to which low and moderate-income households will be served or will benefit; the extent to which health and safety issues apply; the extent to which the proposal addresses the community’s special needs housing and a market analysis of the proposed activity and waiting lists (if appropriate).
2. **Project Feasibility:** DECD must expend federal funds in a timely manner; therefore, priority shall be given to all projects that have a “ready to go” status. “Ready to go” means that necessary approvals are in place, such as



permits, funding, certifications, etc. This category will consider distinct areas: site, development, and operational feasibility. **Site feasibility** will consider the environmental condition of the proposed activity, site control, current zoning and approvals, infrastructure condition and needs, the presence of hazardous materials, and historic preservation requirements. **Development feasibility** will consider project cost including total development cost, per unit cost and program cost (“soft cost”), proposed development budget, appraisals, funding commitments from other sources, amount of funding leveraged by HOME or Small Cities CDBG funds, the extent to which HOME or Small Cities CDBG is used as gap financing or funding of last resort, relocation, project time line, and project readiness to proceed. **Operational feasibility** will consider proposed operating budget, proposed rents and/or purchase prices, the reasonableness of operating expenses including fees, and cash flow projections for the project.

3. **Applicant/Sponsor Capacity:** all applicants must meet all thresholds and be in full compliance with any and all assistance agreements with DECD and cannot be in default under any DECD, CHFA or HUD-administered program. This category will consider the applicant’s success with previous DECD funded projects, development experience, experience of the development team and staff, management experience, performance in administering previous grants and/or loans from DECD, and performance in promoting fair housing and equal opportunities.
4. **Community Impact:** DECD will consider whether the project is part of a comprehensive planning process for the community, such as a Community Revitalization Strategies Plan, Plan of Development or similar planning effort. The applicant must provide evidence of the planning effort supporting the project. This category will consider: the relationship between the proposed activity and the other housing, economic and community development activities that are planned or underway in the impacted neighborhood; the relationship of the proposed activity to priorities identified in the municipality’s or region’s plan of development; the economic impact of the proposed activity; local government support for the proposed activity; neighborhood support for the proposed activity and if the proposed activity is located in a targeted investment area, such as a Neighborhood Revitalization Zone or Enterprise Zone.
5. **Fair Housing and Equal Opportunity:** DECD will consider the demonstration of a previously approved and active Fair Housing Plan, and the applicant’s performance in achieving the goals of the plan. The applicant’s Fair Housing Plan should reflect the requirements of DECD’s Analysis of Impediments Action Plan. In addition, the department will also consider the demonstration of an active Equal Opportunity Plan and the applicant’s performance against that plan. Applicants must submit a Fair Housing Plan that has been updated within the last two years and milestones/achievements as a result of the plan. This category will consider the extent to which proposals promote racial and economic integration, the extent to which the proposal offers housing choice and opportunities to extremely low/very low/low and moderate-income households and to persons

with special needs, and the extent to which the proposed project reduces racial segregation. The Fair Housing category will only apply to housing proposals, while Equal Opportunity will be applied to all proposals.

**Compliance and Monitoring for HOME and Small Cities CDBG Programs:**

The department will monitor applicants' compliance to program requirements in accordance with 24 CFR 92.508 and 24 CFR 570.492 for the HOME and Small Cities CDBG programs respectively. Applicants will be notified in advance of any project monitoring. Applicants should be aware of the long-term compliance requirements associated with their respective projects in advance of accepting a contract for funding with the department.

**State and Federal Resources for DECD: State fiscal year 2006-2007**

This table lists the anticipated/estimated level of state and federal funding available in state fiscal year 2006-2007. Please note that Connecticut's 2005-2009 Consolidated Plan outlines how the state plans to leverage CDBG and HOME funds against other sources of funding. For more detail concerning how Connecticut leverages federal and state funds against each other and against non-governmental funding sources, please refer to the Connecticut 2005-2009 Consolidated Plan and Connecticut 2005-2009 State Long-Range housing Plan. Both of these documents are available on the DECD website.

<b>ECONOMIC &amp; COMMUNITY DEVELOPMENT (DECD)</b>	<b>STATE FY 06-07</b>	<b>HUD FY 06-07</b>	<b>TOTAL</b>
HOME (includes ADDI \$)	\$-	\$12,512,547*	\$12,512,547*
Small Cities Community Development Block Grant	\$-	\$13,645,095*	\$13,645,095*
Small Town Economic Assistance Program, STEAP Funds	\$ TBD	\$-	\$ TBD
Flexible Housing Funds	\$15,000,000	\$-	\$15,000,000
Assisted Living Funds	\$ 1,445,400	\$-	\$ 1,445,400
Housing Assistance and Counseling	\$ 588,903	\$-	\$ 588,903
Elderly/Congregate Rental Assistance	\$ 1,523,004	\$-	\$ 1,523,004
Congregate Operating Subsidy	\$ 5,995,979	\$-	\$ 5,995,979
Urban Act Funds (Community Development)	\$ TBD	\$	\$ TBD
PILOT	\$ 2,204,000	\$-	\$ 2,204,000
Tax Abatement	\$ 1,704,890	\$	\$ 1,704,890
Housing Trust Fund	\$20,000,000	\$-	\$20,000,000
<b>TOTAL FOR DECD:</b>	<b>\$48,462,176</b>	<b>\$26,157,642</b>	<b>\$74,619,818</b>

Note DECD figures are based on Governor's Recommended Budget

\* Estimated

<b>CONNECTICUT HOUSING FINANCE AUTHORITY (CHFA)</b>	<b>STATE FY 06-07</b>	<b>HUD FY 06-07</b>	<b>TOTAL</b>
Low Income Housing Tax Credit	\$-	\$ TBD	\$ TBD
<b>TOTAL FOR CHFA:</b>	<b>\$-</b>	<b>\$ TBD</b>	<b>\$ TBD</b>

## **Priority Objectives and Performance Goals for HOME and Small Cities CDBG Programs:**

The state intends to make available HOME and Small Cities CDBG funds to eligible recipients based on the priorities set forth in the 2005-2009 Consolidated Plan and this document.

The Performance Outcome Measurement System associated with the 2005-09 Consolidated Plan includes objectives, outcome measures and indicators (outputs). It has three overarching program objectives under which all CDBG, HOME, ESG and HOPWA program activities, outcome indicators and measures will be grouped. They are as follows:

### **I. Encouraging Homeownership**

- Improve the ability of low and moderate-income residents to access homeownership opportunities.

### **II. Expanding the Supply of Quality Affordable Housing**

- Preserve and increase the supply of quality affordable housing available to all low and moderate-income households, and help identify and develop available resources to assist in the development of housing.
- Improve the ability of low and moderate-income residents to access rental housing opportunities.
- Assist in addressing the shelter, housing, and service needs of the homeless poor and others with special needs.

### **III. Revitalizing Communities**

- Provide communities with assistance to undertake economic development initiatives.
- Provide assistance to help communities undertake community infrastructure, facility, and service projects affecting public health, safety and welfare.

These three objectives incorporate the statutory objectives for the CDBG, HOME, ESG and HOPWA programs. Grouping the program activities in this way allows Connecticut to report on its progress toward meeting the overall objectives of the aforementioned programs in a simplified and comprehensive manner. In some cases, activities will fall under more than one program objective, depending upon the purpose/type of the program.

The measures, used in the Consolidated Plan's Performance Outcome Measurement System, are designed to clearly gauge whether or not the activities being funded under the four federal programs, governed by the plan, are meeting the plan's stated goals and objectives.

As stated in Section IX "Strategic Plan" of the Consolidated Plan, there are twelve goals supporting the plan's three overarching goals. Each goal is supported by specific objectives. Each objective has specific measures associated with it.

**Performance Measurement Methodology:**

The ultimate purpose of the Performance Outcome Measurement System of the Consolidated Plan is to clearly demonstrate whether or not Connecticut is achieving the statutory objectives of the CDBG, HOME, ESG and HOPWA programs. The strategic plan section of the Consolidated Plan has been designed to link the statutory goals of these four programs to the specific activities carried out by the state. Please refer to Section IX "Strategic Plan" of the Consolidated Plan for detail on the plan's overarching goals, goals and objectives.

Therefore:

- If the majority of a goal's stated objectives are achieved, then that goal will be considered accomplished.
- If the majority of the goals that support one of the plan's overarching goals are achieved, then that overarching goal will be considered accomplished.
- As the three overarching goals of Connecticut's Consolidated Plan incorporate the statutory objectives for the CDBG, HOME, ESG and HOPWA programs, the statutory objectives for these programs will be considered accomplished if the overarching goals of this plan have been accomplished.

**Performance Measures:**

The metrics (outcome measures and indicators/outputs) used to gauge the success or failure of the Consolidated Plan must be tangible and obtainable. They must be clearly understandable and easily flow through a hierarchical construct, which links actions to the ultimate goals of the federal programs governed by the plan.

Each specific objective has been assigned one or more measures designed to clearly identify whether or not that objective has been met. (See Section XI "Performance Measurements" Goals & Objectives Matrix of the Consolidated Plan for specific measures). As mentioned above, a goal will be considered successfully fulfilled if the majority of its associated specific objectives have been accomplished and, as such, the success or failure in meeting a goal's specific objectives acts as the metric for measuring the state's performance in meeting the plan's goals.

The Consolidated Plan's overarching goals will be considered successfully fulfilled if the majority of their associated goals has been accomplished and, as such, the success or failure in meeting the goals associated with each overarching goal acts as the metric for measuring the state's performance in meeting the plan's overarching goals.

The statutory goals of the four programs will be considered successfully fulfilled if the overarching goals of the Consolidated Plan have been accomplished and, as such, the success or failure in meeting the overarching goals of the plan acts as the metric for measuring the state's performance in meeting the statutory goals of the four programs.

A graphic illustration of the objective and goal linkages, and outcome measures and indicators is located in Section XI “Performance Measurements” Goals & Objectives Matrix of the Consolidated Plan.

**Development of Specific Objectives and Proposed Accomplishments;**

The specific objectives and proposed accomplishments described in Section IX “Strategic Plan” of the Consolidated Plan were derived from a thorough review of the various needs within the state, a review of the resources available to address those needs, an assessment of the capacity of the state, local jurisdictions, housing authorities and private and not-for-profit organizations to meet those needs, and through a review of the state’s historic achievements in meeting those needs in the past and the costs associated with those achievements.

**Prioritization of Funding and Need:**

The Consolidated Plan recognizes that the housing and community development needs of the state are many while the resources to address these issues are limited. As such, this plan attempts to maximize all available state and federal resources by focusing the state’s efforts.

Only those issues deemed to be a high priority to the state have been identified in this plan. All other issues are, by default, deemed to be a lower priority in terms of funding attention.

There are 12 goals outlined in the Consolidated Plan document. These goals are as follows:

- Goal 1:**           **Supportive Housing** - Develop and implement strategies and solutions to address the problem of homelessness through the utilization of supportive housing.
  
- Goal 2:**           **Home Ownership** - Improve the ability of low and moderate-income residents to access home ownership opportunities.
  
- Goal 3:**           **Rental Housing Supply** - Preserve and increase the supply of quality affordable housing available to low and moderate-income households.
  
- Goal 4:**           **Rental Housing Opportunities** - Improve the ability of low and moderate-income residents to access rental housing opportunities.
  
- Goal 5:**           **Affordable Housing Planning** - Help identify and develop available resources to assist in the development of housing.
  
- Goal 6:**           **Fair Housing** - Empower upward mobility for low and moderate-income residents through fair housing.
  
- Goal 7:**           **Homelessness** - Address the shelter, housing and service needs of the homeless poor and others with special needs.

- Goal 8: Special Needs** - Address the housing and service needs of those populations defined as having special needs:
- Elderly and Frail Elderly
  - Persons with Disabilities
  - Persons with HIV/Aids and Their Families
  - Persons with Substance Abuse Issues
  - Persons Recently De-Incarcerated
- Goal 9: Lead Paint and Hazardous Materials** - Support the removal of lead-based paint and other hazardous materials in existing housing.
- Goal 10: Public Housing Residents** - Facilitate homeownership opportunities for public housing residents.
- Goal 11: Non-Housing: Economic Development** - Provide communities with assistance to undertake economic development initiatives.
- Goal 12: Non-Housing: Infrastructure and Public Facilities** - Provide assistance to undertake improvements to the community infrastructure, and construct or rehabilitate public facilities projects affecting public health, safety and welfare of low and moderate-income residents.

**Objectives, Accomplishments and Measures:**

Each goal is followed by specific objectives (objectives are either specific actions to be taken or specific milestones to be achieved). A corresponding proposed accomplishment follows each of these objectives. The accomplishments are designed to serve as the metric that will gauge the performance of the state in meeting the objectives and ultimately the goal to which they relate.

**Basis for Assigning Priority:**

Each objective and accomplishment also has a proposed funding source (or sources), a population and geographic target, and a priority rating. Each objective is supported by a brief discussion of the need/basis for assigning the priority and of obstacles to meeting underserved needs summarized from the Needs Assessment and Housing Market Analysis sections of the Consolidated Plan.

Priority ratings were established after a thorough examination of Connecticut's housing and community development needs and the state's current and historical housing market. (See Needs Assessment and Housing Market Analysis sections of the Consolidated Plan.) Based on the state's review of all relevant and available data, specific issues were selected and run through an internal screening at the Departments of Economic and Community Development and Social Services. Issues chosen to be assigned high priority funding status within this plan were selected based on three overarching factors: (1) the issue's relative demonstrated need (as identified in the needs assessment), (2) the availability of other funds to address the need and (3) the eligibility criteria of each of the four federal programs governed by this plan.

**High Priority Needs and Funding:**

As stated above, only those issues deemed to be a high priority to the state have been identified in the Consolidated Plan. All other issues are, by default, deemed to be a lower priority in terms of federal funding attention.

This does not exclude the state from funding lower priority projects. The high priority designation serves to emphasize to the public, the areas in which the state will concentrate its efforts over the next five years, in terms of housing and community development. Further, it defines where the state will focus its usage of the federal funds accessed through the four state-administered federal programs governed by this plan.

A proposed project that addresses a high priority need is not guaranteed funding based solely on the fact that it will address a high priority need. All projects funded by the state must be financially and logistically feasible as well as meet all of the eligibility criteria of the proposed funding source. When two or more projects are competing for funding dollars (all things being equal), the project addressing the high priority need will be given funding preference.

Note: for the purposes of this plan, "Other Funds" include all available state, federal or private funds other than those allocated to the state under the CDBG, ESG, HOME and HOPWA programs.

The 2005-06 Action Plan outlined the department's proposed accomplishments for 2005-06 based on the performance measurement system presented in the 2005-09 Consolidated Plan. The results for the 2005-2006 program year accomplishments are not available to be contained within this document. The Performance Evaluation Report (PER) for 2005-06 will contain the actual accomplishments.

The "Goals and Objectives Matrix" starting on page A-33 outlines the department's proposed accomplishments for 2006-07, including those actions to be taken during the program year to overcome the effects of impediments identified in the five-year consolidated plan. The proposed accomplishments appearing in this section are based on the performance measurement system presented in the 2005-09 Consolidated Plan as described above. HUD's CPD Outcome Measurement System has also been incorporated as the last three columns of the matrix. Outlined below is further detail on HUD's new Performance Measurement System.

**HUD Outcome Performance Measurement System:**

Below is the key based on the HUD Outcome Performance Measurement System for Community Planning and Development Formula Grant Programs as contained in Federal Register/ Vol. 71, No. 44 dated March 7, 2006.

**Objectives:**

**I. Suitable Living Environment:** in general, this objective relates to activities that are designed to benefit communities, families, or individuals by addressing issues in their living environment.

**II. Decent Housing:** the activities that are typically found under this objective are designed to cover the wide range of housing possible under HOME, CDBG, HOPWA, or ESG. This objective focuses on housing programs where the purpose of the program is to meet individual family or community needs and not programs where housing is an element of a larger effort, since such programs would be more appropriately reported under Suitable Living Environment.

**III. Creating Economic Opportunities:** this objective applies to the types of activities related to economic development, commercial revitalization, or job creation.

**Outcomes:**

- A. **Availability/Accessibility:** this outcome category applies to activities that make services, infrastructure, public services, public facilities, housing, or shelter available or accessible to low and moderate-income people, including persons with disabilities. In this category, accessibility refers not only to physical barriers, but also to making the affordable basics of daily living available and accessible to low and moderate-income people where they live.
- B. **Affordability:** this outcome category applies to activities that provide affordability in a variety of ways in the lives of low and moderate-income people. It can include the creation or maintenance of affordable housing, basic infrastructure hook-ups, or services such as transportation or day care.
- C. **Sustainability/Promoting Livable or Viable Communities:** this outcome applies to projects where the activity or activities are aimed at improving communities or neighborhoods, helping to make them livable or viable by providing benefit to persons of low and moderate-income or by removing or eliminating slums or blighted areas, through multiple activities or services that sustain communities or neighborhoods.

**Output Indicators:**

For each activity, applicants report on:

1. Amount of money leveraged (from other federal, state, local, and private sources) per activity;
2. Number of persons, households, units, or beds assisted, as appropriate;
3. Income levels of persons or households by: 30%, 50%, 60%, or 80% of area median income, per applicable program requirements. However, if a CDBG activity benefits a target area, that activity will show the total number of persons served and the percentage of low and moderate-income persons served. Note that this requirement is not applicable for economic development activities awarding funding on a "made available basis;"
4. Race, ethnicity, and disability (for activities in programs that currently report these data elements)



**Specific Indicators, As Applicable:**

5. Public facility or infrastructure activities
  - a. Number of persons assisted:
    - With new access to a facility or infrastructure benefit
    - With improved access to a facility or infrastructure benefit
    - Where activity was used to meet a quality standard or measurably improved quality, report the number that no longer only have access to a substandard facility or infrastructure
  
6. Public service activities
  - a. Number of persons assisted:
    - With new access to a service
    - With improved access to a service
    - Where activity was used to meet a quality standard or measurably improved quality, report the number that no longer only have access to substandard service
  
7. Activities are part of a geographically targeted revitalization effort (Y/N)  
If Yes (check one)
  - a. Comprehensive
  - b. Commercial
  - c. Housing
  - d. OtherChoose all the indicators that apply, or at least 3 indicators if the effort is (a) Comprehensive.
  - Number of new businesses assisted
  - Number of businesses retained
  - Number of jobs created or retained in target area
  - Amount of money leveraged (from other public or private sources)
  - Number of low or moderate-income (LMI) persons served
  - Slum/blight demolition
  - Number of LMI households assisted
  - Number of acres of remediated brownfields
  - Number of households with new or improved access to public facilities/services
  - Number of commercial facade treatment/business building rehab
  - Optional indicators: numbers on crime rates, property value change, housing code violations, business occupancy rates, employment rates, homeownership rates
  
8. Number of commercial facade treatment/business building rehab (site, not target area based)
  
9. Number of acres of brownfields remediated (site, not target area based)
  
10. New rental units constructed per project or activity
  - a. Total number of units:

Of total:

- Number affordable
- Number section 504 accessible
- Number qualified as Energy Star
  - Of the affordable units:
  - Number occupied by elderly
  - Number subsidized with project-based rental assistance (federal, state, or local program)
  - Number of years of affordability
  - Number of housing units designated for persons with HIV/AIDS, including those units receiving assistance for operations

Of those, number of units for the chronically homeless:

- Number of units of permanent housing designated for homeless persons and families, including those units receiving assistance for operations

Of those:

- Number of units for the chronically homeless

11. Rental units rehabilitated

a. Total number of units:

Of total:

- Number affordable
- Number section 504 accessible
- Number of units created through conversion of nonresidential buildings to residential buildings
- Number brought from substandard to standard condition (HQS or local code)
- Number qualified as Energy Star
- Number brought into compliance with lead safe housing rule (24 CFR part 35)

Of those affordable:

- Number occupied by elderly
- Number subsidized with project-based rental assistance (federal, state or local program)
- Number of years of affordability
- Number of housing units designated for persons with HIV/AIDS, including those units receiving assistance for operations

Of those:

- Number of units for the chronically homeless
- Number of units of permanent housing for homeless persons and families, including those units receiving assistance for operations

Of those:

- Number of units for the chronically homeless

12. Homeownership units constructed, acquired, and/or acquired with rehabilitation (per project or activity)

a. Total number of units:

Of those:

- Number of affordable units
- Number of years of affordability
- Number qualified as Energy Star
- Number section 504 accessible
- Number of households previously living in subsidized housing
- Of those affordable:
  - Number occupied by elderly
  - Number specifically designated for persons with HIV/AIDS
- Of those:
  - Number specifically for chronically homeless
  - Number specifically designated for homeless
- Of those:
  - Number specifically for chronically homeless

13. Owner occupied units rehabilitated or improved

- a. Total number of units
  - Number occupied by elderly
  - Number of units brought from substandard to standard condition (HQS or local code)
  - Number qualified as Energy Star
  - Number of units brought into compliance with lead safe housing rule (24 CFR part 35)
  - Number of units made accessible for persons with disabilities

14. Direct financial assistance to homebuyers

- a. Number of first-time homebuyers
  - Of those:
    - Number receiving housing counseling
    - Number receiving downpayment assistance/closing costs

15. Tenant- based rental assistance (TBRA)

- a. Total number of households:
  - Of those:
    - Number with short-term rental assistance (less than 12 months)
    - Number of homeless households
      - Of those:
        - Number of chronically homeless households

16. Number of homeless persons given overnight shelter

17. Number of beds created in overnight shelter or other emergency housing

18. Homelessness Prevention

- a. Number of households that received emergency financial assistance to prevent homelessness
- b. Number of households that received emergency legal assistance to prevent homelessness

19. Jobs created

- a. Total number of jobs:
    - Employer-sponsored health care (Y/N)
    - Type of jobs created (use existing Economic Development Administration (EDA) classification)
    - Employment status before taking job created:
      - Number of unemployed
20. Jobs retained
- a. Total number of jobs:
    - Employer-sponsored health care benefits
21. Businesses assisted
- a. New businesses assisted
  - b. Existing businesses assisted
    - Of those:
      - Business expansions
      - Business relocations
  - c. DUNS number(s) of businesses assisted (HUD will use the DUNS numbers to track number of new businesses that remain operational for 3 years after assistance)
22. Does assisted business provide a good or service to meet needs of service area/neighborhood/community (to be determined by community)?

### **Examples**

Each outcome category can be connected to each of the overarching objectives, resulting in a total of nine groups of outcome/objective statements under which grantees would report the activity or project data to document the results of their activities or projects. They are activities or projects that provide:

- Accessibility for the purpose of creating suitable living environments
- Accessibility for the purpose of providing decent housing
- Accessibility for the purpose of creating economic opportunities
- Affordability for the purpose of creating suitable living environments
- Affordability for the purpose of providing decent housing
- Affordability for the purpose of creating economic opportunities
- Sustainability for the purpose of creating suitable living environments
- Sustainability for the purpose of providing decent housing
- Sustainability for the purpose of creating economic opportunity

Each output should relate to the intended outcome/objective of the program activities and community objectives. A complete statement has these components: Output (quantified) + Outcome (from categories above) + Activity (description) + Objective. Combining these elements into a single sentence summarizes the community's activities, results, intended outcomes, and purpose in a way that can be related to resource inputs. Sometimes an adjective such as new, improved, or corrective may be appropriate to refine the outcome statement.

- 2000 homeless persons have new access to a shelter for the purpose of creating decent housing
- 7 households have new access to homeownership for the purpose of creating decent housing
- 24 households have sustained decent housing by emergency repair for the purpose of providing decent housing
- 52 households have new access to public sewer for the purpose of creating a suitable living environment
- 50 persons have access to new jobs through extension of a water line to a business for the purpose of creating economic opportunity
- 50 households have housing through a downpayment assistance program for the purpose of creating decent housing
- 75 very low-income persons living with HIV/AIDS were assisted with on-going (monthly) housing subsidies for the purpose of providing decent housing

2006-2007 GOALS & OBJECTIVES MATRIX										
AFFORDABLE HOUSING										
Goal 1 SUPPORTIVE HOUSING - Develop and implement strategies and solutions to address the problem of homelessness through the utilization of supportive housing.										
SERVICE DELIVERY – SUPPORTIVE HOUSING										
Proposed Funding	Objective		Output		Performance Measure		Goal	HUD Objective	HUD Outcomes	HUD Outputs
HOPWA & State \$	1	Evaluate the appropriate method or vehicle to introduce supportive services into existing housing units.	1	Evaluate the appropriate method or vehicle to introduce supportive services into existing housing units over the next 5 years.	1	Evaluation completed - Yes or No.	5 <sup>th</sup> year.	I	C	N/A
Goal 2 HOME OWNERSHIP - Improve the ability of low and moderate-income residents to access home ownership opportunities.										
PRODUCTION OF NEW UNITS - SINGLE FAMILY										
Proposed Funding	Objective		Output		Performance Measure		Goal	HUD Objective	HUD Outcomes	HUD Outputs
HOME/ADDI	1	Under the HOME/ADDI program, support local efforts to develop appropriate homeownership housing to make better use of limited urban land.	1	Support 25 homeownership units of housing in urban areas each year.	1	Number of homeownership units created.	25 units annually.	II	A, B	1,2,3,4,12,14
HOME & Other	2	Promote and support mixed-income developments in areas that currently underserved low and moderate-income households.	1	Give preference to 1 mixed-income infill project creating at least 10 units of housing each year in areas that currently underserved low and moderate-income households.	1	Was preference given to at least 1 mixed-income infill project - Yes or No.	1 project and 10 units annually.	I	B	1,2,3,4,12,14
					2	Number of mixed-income infill units created.	5 <sup>th</sup> year.			

REHABILITATION OF EXISTING UNITS - SINGLE FAMILY										
Proposed Funding	Objective		Output		Performance Measure		Goal	HUD Objective	HUD Outcomes	HUD Outputs
CDBG	1	Support the moderate rehabilitation of existing single-family homes (a single family home is defined as a 1 to 4 unit owner occupied residential structure).	1	Support 4 single-family moderate rehabilitation projects each year (with up to 100 units each) in CDBG eligible communities.	1	Number of single-family moderate rehabilitation projects completed each year.	4 projects annually.	II	A,B	1,2,3,4,12
					2	Number of single-family units rehabbed each year.	5 <sup>th</sup> year.			
					3	Was the goal of 4 single-family moderate rehabilitation projects each year achieved- Yes or No.	5 <sup>th</sup> year.			
<b>Goal 3 RENTAL HOUSING SUPPLY – Preserve and increase the supply of quality affordable housing available to low and moderate-income households.</b>										
<b>PRODUCTION OF NEW UNITS – MULTIFAMILY RENTAL</b>										
Proposed Funding	Objective		Output		Performance Measure		Goal	HUD Objective	HUD Outcomes	HUD Outputs
HOME	1	Promote and support mixed-income developments in areas that currently underserved low and moderate-income households.	1	Produce 30 units of new multifamily housing in suburban towns each year.	1	Number of new multifamily housing units created in suburban towns each year.	30 units annually.	II	A,B	1,2,3,4,10
					2	Did the number of new multifamily housing units created in suburban towns each year fall within the targeted range – Yes or No.	5 <sup>th</sup> year.			

<b>HOME, CDBG &amp; Other</b>	<b>2</b>	Support adaptive re-use of historic structures for use as residential structures.	<b>1</b>	Through the adaptive re-use of historic structures, create and or preserve up to 50 residential units over the next 5 years.	<b>1</b>	Number of residential units created and/or preserved through the adaptive re-use of historic structures.	50 units by 5 <sup>th</sup> year.	<b>II</b>	A,B	1,2,3,4,10
					<b>2</b>	Were 50 residential units created and/or preserved over the 5-year period, through the adaptive re-use of historic structures.	Yes or No.			
<b>REHABILITATION OF EXISTING UNITS – MULTIFAMILY RENTAL</b>										
<b>Proposed Funding</b>	<b>Objective</b>		<b>Output</b>		<b>Performance Measure</b>		<b>Goal</b>	<b>HUD Objective</b>	<b>HUD Outcomes</b>	<b>HUD Outputs</b>
<b>CDBG</b>	<b>1</b>	Invest in the maintenance and preservation of existing publicly assisted rental-housing stock to preserve it as a long-term resource.	<b>1</b>	Preserve 100 rental units statewide each year.	<b>1</b>	Number of existing publicly assisted rental units preserved.	100 units annually.	<b>II</b>	A, B	1,2,3,4,11
					<b>2</b>	Was the target of 100 units per year achieved - Yes or No.	5 <sup>th</sup> year.			
<b>HOME</b>	<b>2</b>	Provide favorable loan terms for multifamily housing and mixed-use properties.	<b>1</b>	Fund up to 5 projects to create 20 units each year.	<b>1</b>	Average term and interest rate for loans for multifamily housing and mixed-use properties projects.	Up to 5 projects and 20 units annually.	<b>I, II</b>	A, B	1,2,3,4,11
					<b>2</b>	Was the average term and interest rate for loans for multifamily housing and mixed-use properties projects below market – Yes or No.	5 <sup>th</sup> year.			



					3	Number of multifamily housing and mixed-use properties projects funded.	5 <sup>th</sup> year.			
					4	Number of multifamily housing and mixed-use properties units created each year.	5 <sup>th</sup> year.			
					5	Were five or more multifamily housing and mixed-use properties projects funded annually and was the goal of 100 units per year achieved – Yes or No.	5 <sup>th</sup> year.			
<b>Goal 5 AFFORDABLE HOUSING PLANNING- Help identify and develop available resources to assist in the development of housing.</b>										
Proposed Funding	Objective		Output		Performance Measure		Goal	HUD Objective	HUD Outcomes	HUD Outputs
CDBG & Other	1	Encourage Regional Planning Organizations and municipalities to: 1) study regional housing cost patterns and zoning practices; 2) establish regional plans to address and promote affordable fair-share housing and inclusionary housing policies that provide choice across income levels, proximity to employment and 3) promote greater opportunity to develop income diverse neighborhoods in urban and suburban areas.	1	Complete 5 regional studies over the next 5 years.	1	Number of regional studies completed.	1 Study annually.			
					2	Were 5 regional studies completed - Yes or No.	5 <sup>th</sup> year.	I	C	N/A

<b>Goal 6 FAIR HOUSING - Empower upward mobility for low and moderate-income residents through fair housing.</b>										
<b>Proposed Funding</b>	<b>Objective</b>		<b>Output</b>		<b>Performance Measure</b>		<b>Goal</b>	<b>HUD Objective</b>	<b>HUD Outcomes</b>	<b>HUD Outputs</b>
<b>HOME &amp; Other</b>	1	Support fair housing education and outreach activities and actions to address illegal discrimination.	1	Increase the collaboration on fair housing issues between the state, housing providers and fair housing advocacy groups.	1	Number of fair housing collaborations between the state, housing providers and fair housing advocacy groups	5 <sup>th</sup> year.	I	C	N/A
<b>HOME, CDBG &amp; Other</b>	2	State will update its Analysis To Impediments To Fair Housing (AI).	1	Complete update of the AI by end of year 2 of the plan.	1	Was AI completed by 2 <sup>nd</sup> year of the plan – Yes or No.	2 <sup>nd</sup> year.	I	C	N/A
<b>Goal 7 HOMELESSNESS – Address the shelter, housing and service needs of the homeless poor and others with special needs.</b>										
<b>COORDINATION AND PLANNING</b>										
<b>Proposed Funding</b>	<b>Objective</b>		<b>Output</b>		<b>Performance Measure</b>		<b>Goal</b>	<b>HUD Objective</b>	<b>HUD Outcomes</b>	<b>HUD Outputs</b>
<b>ESG &amp; Other</b>	1	Expand homeless prevention services, follow-up services and increase transitional services throughout the system.	1	Utilize the Beyond Shelter program, administered by the DSS, to reduce the reoccurrence of homelessness by assisting families who are leaving homeless shelters and transitional living programs to achieve housing stability by providing support services.	1	Number of homelessness reoccurrences among DSS assisted families leaving shelters and transitional living programs.	5 <sup>th</sup> year.	I	A	1,2,3,4,16,17,18
					2	Was the number of reoccurrences reduced – Yes or No.	5 <sup>th</sup> year.			

<b>Goal 8 Special Needs – Address the housing and service needs of those populations defined as having special needs.</b>													
<b>PERSONS WITH HIV/AIDS AND THEIR FAMILIES</b>													
<b>Proposed Funding</b>	<b>Objective</b>			<b>Output</b>		<b>Performance Measure</b>		<b>Goal</b>	<b>HUD Objective</b>	<b>HUD Outcomes</b>	<b>HUD Outputs</b>		
<b>HOPWA &amp; Other</b>	<b>1</b>	Continue to fund existing HIV/AIDS programs.		<b>1</b>	Seek additional federal funding for existing HIV/AIDS programs.		<b>1</b>	Was additional funding sought - Yes or No.	5 <sup>th</sup> year.	I	C	1,2,3,4	
							<b>2</b>	What additional federal funding was sought.	5 <sup>th</sup> year.				
					<b>2</b>	Increase access to supportive housing services for people living with HIV/AIDS and increase number of clients from 170 to 255 over five years.		<b>1</b>	Number of people accessing supportive housing services.	17 people annually.	I	C	1,2,3,4, 6
								<b>2</b>	Year over year change in number of people accessing supportive housing services.	5 <sup>th</sup> year.			
								<b>3</b>	Did the number of people accessing supportive housing services increase - Yes or No.	5 <sup>th</sup> year.			
<b>HOPWA &amp; Other</b>	<b>2</b>	Assess the effectiveness of supportive housing programs for people living with HIV/AIDS periodically through the use of performance measures and on-going mechanisms to track consumer preferences and needs.		<b>1</b>	Continue to evaluate AIDS/HIV supportive housing programs at least once a year.		<b>1</b>	Was the program annually evaluated - Yes or No.	5 <sup>th</sup> year.	I	C	N/A	
<b>HOPWA &amp; Other</b>	<b>3</b>	Develop new mental health and addiction service programs to meet the specific needs of persons with HIV/AIDS.		<b>1</b>	Review availability of new federal and state funding to meet specific needs of client population with a goal of increasing the number of clients provided appropriate services from 170 to 255 over five years.		<b>1</b>	Was the availability of funding reviewed annually - Yes or No.	17 people annually.	I	C	1,2,3,4, 6	

					2	Was additional funding secured - Yes or No.	5 <sup>th</sup> year.			
<b>Goal 9 LEAD PAINT AND HAZARDOUS MATERIALS - Support the removal of lead-based paint and other hazardous materials in existing housing.</b>										
<b>Proposed Funding</b>	<b>Objective</b>		<b>Output</b>		<b>Performance Measure</b>		<b>Goal</b>	<b>HUD Objective</b>	<b>HUD Outcomes</b>	<b>HUD Outputs</b>
<b>CDBG, HOME &amp; Other</b>	1	Support the removal of lead-based paint and other hazardous materials in existing housing through paint testing and risk assessments in accordance with the final lead safe housing rule - Title X of the Lead-based Paint Hazard Reduction Act of 1992 (24 CFR pt 35).	1	Support up to 3 housing rehabilitation projects per year with the goal of making 20 units per year lead safe.	1	Number of housing lead-safe rehab projects per year.	3 projects and 20 units annually.	II	C	1,2,3,4,11,13
					2	Number of housing units made lead-safe per year.	5 <sup>th</sup> year.			
					3	Was the goal of up to 3 housing rehab projects per year and 20 units per year achieved - Yes or No.	5 <sup>th</sup> year.			
<b>CDBG &amp; Other</b>	2	Support the implementation of the Lead Action for Medicaid Primary Prevention (LAMPP) program.	1	Utilize the LAMPP program to eliminate lead-based paint hazards in priority housing. LAMPP will eliminate lead-based paint hazards in 155 units per year and conduct paint inspections/risk assessments in 160 units per year.	1	Number of units made lead-safe under the LAMPP program.	115 units annually.	II	C	1,2,3,4,11,13
					2	Number of paint inspections/risk assessments conducted per year.	160 units annually.			

**NON-HOUSING**

Goal 11 NON-HOUSING: ECONOMIC DEVELOPMENT - Provide communities with assistance to undertake economic development initiatives.										
Proposed Funding	Objective		Output		Performance Measure		Goal	HUD Objective	HUD Outcomes	HUD Outputs
CDBG & Other	1	Offer expanded economic opportunities including job creation and retention through the establishment, stabilization and expansion of small businesses (including Micro-enterprises) and the provision of public services concerned with employment.	1	Support at least one Economic Development Project with the creation of up to 15 jobs per year (8 of which will be for low and moderate income persons).	1	Number of economic development projects funded under the CDBG program annually.	1 project annually.			
					2	Number of jobs created by economic development projects funded under the CDBG program annually.	Annually.	III	C	1,2,3,4,19,21
					3	Percent of jobs created by economic development projects funded under the CDBG program annually benefiting low and moderate-income persons.	Annually.			

<b>Goal 12 NON-HOUSING: INFRASTRUCTURE &amp; PUBLIC FACILITIES - Provide assistance to undertake improvements to the community infrastructure, and construct or rehabilitate public facilities projects affecting public health, safety and welfare of low- and moderate-income residents.</b>								
<b>Proposed Funding</b>	<b>Objective</b>	<b>Output</b>	<b>Performance Measure</b>		<b>Goal</b>	<b>HUD Objective</b>	<b>HUD Outcomes</b>	<b>HUD Outputs</b>
<b>CDBG &amp; Other</b>	<b>1</b> Support the upgrading of existing infrastructure within areas where the majority of residents are of low- and moderate-income.	<b>1</b> Support up to 3 infrastructure projects per year to include reconstruction of streets, sidewalks, water lines, and drainage problems in predominately low and moderate-income areas.	<b>1</b>	Number of infrastructure conducted projects per year.	15 projects annually.	I	C	1,3,5
					<b>2</b> Was the goal of 3 infrastructure projects per year achieved - Yes or No.	5 <sup>th</sup> year.		
<b>CDBG &amp; Other</b>	<b>2</b> Support the construction and/or rehabilitation and/or expansion of existing public facilities that primarily serve low and moderate-income persons, including but not limited to: senior centers, homeless shelters, battered women shelters, daycare centers, and efforts to meet the needs of the physically handicapped population by supporting projects designed to make current facilities accessible or to provide new-handicapped accessible facilities.	<b>1</b> Support up to 10 public facilities projects per year.	<b>1</b>	Number of public facilities projects conducted per year.	10 projects annually.	I	A	1,3,5
					<b>2</b> Was the goal of 10 public facilities projects per year achieved - Yes or No.	5 <sup>th</sup> year.		



### C. **Emergency Shelter Grants (ESG) Program:**

Although DECD is the lead agency for the ConPlan and related action plans, the Department of Social Services (DSS) is the state recipient for ESG funds because it is the lead state agency for emergency homeless shelters and a variety of programs that serve the state's low-income population. DSS is also the lead agency for Section 8 vouchers and the state-funded Rental Assistance Program. The DSS budget also includes other sources of funding for the homeless.

Connecticut anticipates \$1,134,627 in federal Emergency Shelter Grant (ESG) funds for the Action Plan program year beginning July 1, 2006. Federal ESG funds will be pooled with \$2,479,521 in annual funding from Connecticut's general operating budget and \$7,734,073 from the U.S. Department of Health and Human Services TANF and Social Services Block Grants.

DSS administers this money by funding twenty-five (25) organizations that include faith-based organizations and a variety of non-profit agencies. In addition, DSS provides state and other funding to these providers who are experienced, well established in their communities and provide quality services. The funding received from ESG enables the organizations to provide additional beds and case management services. DSS will be working on developing a more formal process for the allocation of all sources of funds to homeless shelters in the future.

The pool of federal and state dollars, allocated to local community and faith-based organizations and municipalities, is for the provision of temporary shelter for homeless individuals and families. The funds provide operational costs, rehabilitation activities, essential services such as counseling, case management, health, education, employment and training as well as help finding permanent housing and homeless prevention activities. Federal ESG funds will primarily be targeted for operational costs (65% of available funds) followed by essential services (30%) and administrative services (5%).

Connecticut currently has twenty-five (25) shelters: seven (7) for single individuals, six (6) that support families and twelve (12) for both families and individuals. These shelters were established over the years due to the documented need to support homeless individuals and families. As needs are identified in local communities, the Department of Social Services examines its current financial capability to determine if there is financial and program support for new shelters. More than 15,000 individuals, including families with children, received emergency shelter services during the program year that began July 1, 2005.

The Department of Social Services consults with the Connecticut Coalition to End Homelessness for the provision of technical assistance, program development, service model recommendations and program evaluation.

**Outcome Measures for Homeless Shelters** - The Department of Social Services has negotiated the following client-based outcomes and measures with directors of emergency shelters. Each shelter will select and negotiate individual numerical outcomes and measures with DSS staff and will submit a monthly statistical and a



quarterly demographics report, as well as an annual performance report. The projected numerical goals represent statewide outcomes that will be evaluated throughout the program year.

**Outcome:** Consumer attains alternate housing and/or accesses social and/or treatment services.

**Measures:**

1. **Singles Housing Programs:** At least 30% of consumers will access another community housing setting such as transitional housing, residential treatment program or permanent housing;
2. **Family Housing Programs:** At least 55% of consumers will access another community housing setting such as transitional housing, residential treatment program or permanent housing;
3. **Singles Housing Programs:** At least 40% of consumers will access additional social services;
4. **Family Housing Programs:** At least 65% of consumers will access additional social services;
5. **Singles Housing Programs:** For consumers with an agreed upon goal of accessing information in order to make informed decisions about their health, education, housing, etc., 95% of consumers will be provided with such information to enable them to make informed decisions; and
6. **Family Housing Programs:** For consumers with an agreed upon goal of accessing information in order to make informed decisions about their health, children's education, housing, etc., 95% of consumers will be provided with such information to enable them to make informed decisions.

**Homeless and Other Special Needs:**

DSS provides funding for transitional living programs to thirty (30) contractors throughout the state for the provision of multi-family or single room residency living arrangements. Transitional living programs serve as a bridge for individuals and/or families after a period of homelessness. A variety of support services are provided to these individuals during their stay in the program. Stays can range from a period of six (6) months to two (2) years. The goal is to have these individuals and/or families gain self-sufficiency and permanent housing.

The state legislature included an additional \$300,000 in the DSS 2006-2007 budget for the provision of case management services for women. These funds will be provided to the homeless shelters in the City of New Haven where there has been an increase in the number of single homeless women. The shelters will hire staff to provide intensive case management and links to supportive services, particularly mental health and substance abuse treatment.

DSS also provides funding for a program known as Beyond Shelter. This prevention program provides coordinated services to newly housed families and their landlords in order to prevent another cycle of homelessness. Families eligible for services are those leaving shelters and transitional living facilities to move into their own housing. Homeless families work with a housing coordinator to identify and resolve problems that could result in the re-occurrence of homelessness.

Services provided may include education on landlord/tenant rights and responsibilities, assistance with food, transportation and parenting as well as support in securing mental health and substance abuse treatment services.

Beyond Shelter programs assist the landlord in matching renters to units and provide tenants with education on landlord/tenant rights and responsibilities including timely payment of rent. Landlords can request other assistance as needed from housing coordinators to resolve problems that threaten housing stability. There are currently six (6) Beyond Shelter programs operating in Connecticut. The state legislature included an extra \$200,000 in the DSS 2006-2007 budget to fund additional programs.

Supportive housing is strongly supported in Connecticut. In January 2002, a Memorandum of Understanding was entered into by several state agencies including the Office of Policy and Management (OPM), the Department of Economic and Community Development (DECD), the Department of Mental Health and Addiction Services (DMHAS), the Department of Social Services (DSS), the Connecticut Housing Finance Authority (CHFA) and the Corporation for Supportive Housing (CSH). This MOU is in support of the statewide PILOTS Supportive Housing Initiative and the purpose is to increase service-supported, affordable housing for people with mental illness or substance abuse problems who face homelessness. DSS has devoted 200 of its 5,400 Section 8 vouchers to project-based programs developed as part of this initiative. Sixteen (16) projects are currently in development throughout the state.

In April 2006, this initiative moved into its next planning phase. The Next Steps Supportive Housing MOU includes OPM, DECD, DMHAS, DSS and CHFA. Through this agreement, DSS will provide up to 250 Rental Assistance Program subsidies for individuals and families who are homeless or at risk of becoming homeless, particularly people experiencing repeated or persistent homelessness. The purpose of the initiative is to enable homeless families and individuals to stabilize their lives and to regain a stake in the community.

#### **Certification on Coordinated State Policy Regarding Discharge:**

The State of Connecticut has been aware of issues related to the lack of coordination around discharge of persons from state institutions and facilities and problems related to resulting homelessness due to the lack of such coordination. State agency staff and community service providers identified this issue through the Consolidated Planning process for 2005-2009. As a result, coordination on discharge is a topic of discussion in the Governor's Working Group on Affordable Housing and through a variety of commissions on which either the Commissioner or DECD staff sit, as well as through other state agency groups that include both public and private service providers, advocates, etc.

Although Connecticut does not yet have a coordinated policy for the discharge of persons from publicly funded institutions in order to prevent discharge resulting in homelessness, the following are examples of current efforts to address this issue:

- DSS and the Department of Corrections (DOC) have entered into a Memorandum of Understanding in which DOC provides funding for two DSS eligibility workers to determine the eligibility of persons being released from Corrections for DSS programs. The DSS programs include Medicaid, Food Stamps, State Administered General Assistance (SAGA), Temporary Family Assistance (TFA) and the State Supplement program. The theory is if the services are in place before the person is released, it will lessen the likelihood of homelessness.
- DOC also has both formal and informal agreements with some of the emergency homeless shelters. The shelters agree to provide beds for persons being released from prisons as well as for the provision of case management services. The case managers work with the clients to help them find employment, permanent housing and any other services they may need in order to become self-sufficient.

**D. Housing Opportunities for Persons with AIDS (HOPWA) Program:**

Connecticut anticipates \$253,000 in Federal Housing Opportunities for Persons with AIDS (HOPWA) funds for the Action Plan program year beginning July 1, 2006. HOPWA funds will be pooled with \$3,092,326 million in annual funding from Connecticut's general operating budget and \$1,078,467 from the U.S. Department of Health and Human Services (HHS). In addition, Connecticut has approximately \$1,088,720 available in bond funds for acquisition, rehabilitation, or new construction of AIDS housing programs. The Connecticut Department of Social Services (DSS) administers these funds.

The majority of HOPWA dollars allocated to Connecticut is funneled through the Eligible Metropolitan Statistical Areas (EMSA) of Bridgeport, Hartford, New Haven and their surrounding areas. DSS receives a small amount of balance of state dollars. Since the EMSA dollars do not cover Eastern Connecticut, DSS currently funds two providers in that area. These providers were selected based on their qualifications, the results of Standards of Care monitoring by the Connecticut AIDS Resource Coalition (CARC) and their experience providing services.

The DSS "balance of state" HOPWA funds will be distributed to these two organizations on a competitive basis. The goal for the two non-profits is to assist between 30-40 households with funds for short-term rent, mortgage and utility assistance and/or tenant-based rental assistance. In addition, these funds, in conjunction with state appropriations, will be used for community residence operational costs, technical assistance, case management and supportive services and housing information and resource identification. The two organizations will comply with HOPWA requirements including a breakdown of funding and a separate line item for HOPWA funds.

The types of housing to be funded include scattered site apartments, community residences with and without 24-hour staffing and respite/hospice care. The housing programs are located in two different Connecticut communities and provide housing with supportive services to approximately 312 individuals at any one time. The supportive services include case management, life management, medical services, legal assistance, substance abuse counseling and recovery

support, pastoral and emotional counseling, cooking and cleaning assistance, transportation, social, recreational, educational and volunteer opportunities.

An estimated sixty (60) individuals living with HIV/AIDS and their families will receive supportive housing assistance. The population to be served is 58% male adult, 30% female adult and 12% children. It is estimated 21% of adults will have a history of substance abuse. Each housing program has specific criteria for admission, which includes verification of HIV/AIDS diagnosis, income verification, review of living situation (homeless or near homeless individuals) and willingness to abide by program regulations such as drug free environments.

The non-profit organizations that provide the described services have established excellent reputations within their communities. Each has developed networks that are informed of the available housing and supportive services provided. Staff work closely with discharge planners from hospitals, homeless shelters and correction facilities, as well as, with case managers and care coordinators from the regional AIDS consortia.

As mentioned previously, CARC and its members, through its quality assurance program, continue to work closely with DSS to establish appropriate and measurable performance measures for the coalition's activities. In addition, CARC mails a semi-annual newsletter to approximately 1,200 social service and housing contacts. DSS consults with CARC for technical assistance in the development of service models and program evaluation. CARC's membership is made up of AIDS housing providers across the state.

**Outcome Measures for AIDS Housing** - The Department of Social Services has negotiated the following outcomes and measures with the AIDS residence service providers. Each organization that receives HOPWA funds will establish numerical goals for the outcomes and measures selected, and also submit semi-annual reports. The numerical goals identified below represent the goal for all individual AIDS residence programs.

**Outcome:** Program will strive to maintain maximum capacity and residents with HIV/AIDS will receive services and support to improve their quality of life.

**Measures:**

7. Programs will maintain an occupancy rate of 80%.
8. For residents with an agreed upon goal of accessing financial and medical entitlement, at least 90% will be assisted in accessing such benefits;
9. For residents with an agreed upon goal of improving daily living skills, at least 90% will demonstrate abilities in one or more functional area(s);
10. For residents with an agreed upon goal of participation in support groups, counseling, therapy or substance abuse treatment, at least 90% will participate 70% of the time;
11. For residents with an agreed upon goal of accessing legal services, at least 90% will access legal services; and
12. For residents with an agreed upon goal of accessing information about medical services, treatment and/or medications in order to make informed

decisions about their health, 100% will access the above identified services to enable them to make informed decisions about their medical treatment.

**State and Federal Resources for DSS: State fiscal year 2006-2007**

This table lists the anticipated/estimated level of state and federal funding available in state fiscal year 2006-2007. Please note that Connecticut’s 2005-2009 Consolidated Plan outlines how the state plans to leverage ESG and HOPWA funds against other sources of funding. For more detail concerning how Connecticut leverages federal and state funds against each other and against none governmental funding sources, please refer to the Connecticut 2005-2009 Consolidated Plan and Connecticut 2005-2009 State Long-Range housing Plan. Both of these documents are available on the DECD website.

<b>SOCIAL SERVICES (DSS)</b>	<b>STATE FY 06-07</b>	<b>HUD FY 06-07</b>	<b>HHS FY 06-07</b>	<b>TOTAL</b>
Emergency Shelters	\$ 2,479,521	\$ 1,134,627	\$7,734,073	\$11,348,221
Domestic Violence Programs	\$ 2,307,203	\$-	\$1,749,538	\$ 4,056,741
Housing Opportunities for Persons With AIDS	\$ 3,092,326	\$ 253,000	\$1,078,467	\$ 4,423,793
Section 8 Rental Assistance	\$-	\$44,093,377	\$-	\$44,093,377
Special Needs Housing Benefits (incl. in TFA, AABD expenditures)	\$ 660,410		\$6,438	\$ 666,848
Time-Limited Rental Assistance	\$ 1,194,922	\$-	\$-	\$ 1,194,922
Rental Assistance Program	\$14,983,329	\$-	\$-	\$14,983,329
Family Home Share Program	\$ 56,405	\$-	\$-	\$ 56,405
Elderly Home Share Program	\$ 98,401	\$-	\$-	\$ 98,401
Security Deposit Program	\$ 525,422	\$-	\$-	\$ 525,422
Eviction Prevention Program	\$ 233,310	\$-	\$ 919,860	\$ 1,153,170
Transitional Living Program	\$ 2,905,016	\$ 28,583	\$ 559,088	\$ 3,492,687
<b>TOTAL FOR DSS</b>	<b>\$28,536,265</b>	<b>\$45,509,587</b>	<b>\$12,047,464</b>	<b>\$86,093,316</b>

**Monitoring for ESG and HOPWA Programs:**

The following describes the standards and procedures that the Department of Social Services (DSS) will use to monitor activities carried out in furtherance of Connecticut’s consolidated plan and will use to ensure long-term compliance with requirements of the ESG and HOPWA programs.

- **ESG Monitoring:** the Department of Social Services grants and contract staff monitor ESG Programs using a tool developed by the staff which, in a comprehensive manner, reviews each program's Administration, Personnel Policies and Procedures, Accounting, Budgeting, Reporting, Program Services, Goals and Objectives, Outcomes and Measures, Contractor's Self-Evaluation Process and Quality Assurance/Licensure Compliance. After all phases of the program have been evaluated, the staff representative will write up any areas of concern with whatever follow-up is needed. DSS staff will provide follow-up if it is deemed necessary.
- **HOPWA Monitoring:** HOPWA contracts are handled somewhat differently than ESG. In addition to the above review, a coordinated effort between

DSS staff representatives and the staff of the Connecticut AIDS Residence Coalition (CARC) perform a “Standards of Care” Review.

The Standards of Care is a comprehensive tool first produced in 1992 and carefully reviewed and updated twice since then. The philosophy behind the development and use of this tool is the belief that all people have a right to safe, affordable, accessible, and permanent housing that enhances their quality of life. The Standards of Care was developed by the Standards Committee of CARC to describe the best practices of operating supportive residential programs for people living with HIV/AIDS. The Standards of Care describes six levels of supportive housing from Level I, a completely independent housing program, to Level VI for those who need skilled nursing care.

The Standards of Care addresses resident eligibility, screening potential residents, staffing, and policies and procedures. These guidelines offer a detailed description of programs in establishing and running a residence. The Standards of Care review assures the quality of programs by setting down guidelines for services, health and safety, and general management. A dual-committee of DSS staff representatives along with CARC staff use this tool to identify programs' strengths and weaknesses, highlight their best practices, and develop a framework, timeline and process for technical assistance to correct deficiencies.

A Standards of Care review includes:

- Program Policies and Procedures: Program and Services, Admissions and Intake Services, and Supervision;
- Life, Health, Safety: Facility and Sanitation Safety, Health Care and Food Service;
- General Admission: Administration, Fiscal Management, Human Resources, Staff Development, Record Keeping and Information Systems;
- Citizen and Community Participation;
- Grievance;
- Structural and Design Considerations;
- Confidentiality; and
- Tuberculosis Screening and Management.

## **2006- 2007 ACTION PLAN – ATTACHMENT A**

### **Citizen Participation:**

#### **Process for Public Hearings and Public Commentary Period**

The department held two public hearings on September 20, 2005 in Rocky Hill and September 22, 2005 in Norwich to elicit input into the development of the state's 2005-06 Action Plan for Housing and Community Development. Notification for these hearings appeared in seven (7) newspapers around the state. See attached copy of the notification. See attached copy of the hearing transcripts.

On November 15, 2005, the department initiated a 30-day public commentary on the draft Action Plan. The public commentary period was concluded on December 15, 2005. The department also held three public hearings; November 21, 2005 in Rocky Hill, November 22, 2005 in Hamden and November 23, 2005 in Coventry. See attached copy of hearing transcripts and public comment letters received. Notification for the public commentary period as well as the three aforementioned public hearings appeared in seven (7) newspapers around the state. See attached copy of the notification.

In addition to the public hearings and commentary period, the department posted the draft Action Plan on the agency's web site and this was noted in the public notices. The department also submitted, via e-mail, a copy of the legal notice for the public commentary period and public hearings as well as a copy of the draft Action Plan to members of the State Legislature's Appropriations Committee, Commerce Committee, Planning and Development Committee and the Chairs of the Housing Sub-Committee.

The Chief Elected Officials of all 169 municipalities in the state received a Department Notice informing them of the public commentary period as well as the public hearings. See attached copy of the notice. The draft Action Plan was also made available at the Regional Planning Agencies during the 30-day commentary period.

#### **September 20, 2005 Public Hearing:**

No one attended this hearing.

#### **September 22, 2005 Public Hearing:**

Comments received during this public hearing are transcribed below.

#### **November 21, 2005 Public Hearing:**

No one attended this hearing.

#### **November 22, 2005 Public Hearing:**

Comments received during this public hearing are transcribed below.

#### **November 23, 2005 Public Hearing:**

Comments received during this public hearing are transcribed below.

#### **November 15, 2005 thru December 15, 2005 Public Comment Period:**

Six people provided written comment

**Comments received at the September 22, 2005 Public Hearing from:**

Bob Zametske, Assistant City Manager, City of Norwich

“My name is Bob Zametske. I am the Assistant City Manager here in the City of Norwich. And my one comment today is, first of all, the City deeply appreciates the DECD’s and the State of Connecticut’s willingness to come solicit public comment and to look for input from communities around the State”.

“My one comment this afternoon really deals with older housing stock. I note that the plan from last go-round has set as a goal, home ownership, and has set as a strategy for achieving that goal the rehabilitation of existing units, single family units, that are in need of rehabilitation. To the extent that the State can really focus on that goal, I think that the interests of the City of Norwich will be well served”.

“As you may know, Norwich is a very old city, and we have a great deal of old housing stock. Much of that housing stock has not been as well maintained as perhaps it could have been. This part of the State has endured a good long period of economic stress. And many of the older housing units that were built at the turn of the last century were not as well maintained through the middle part of the last century as they could have been. There is a great need right now to go in and do a lot of work on many of the older houses here in Norwich and New London, throughout this region”.

“And, again, I’d like to just get the State, to the extent that it’s possible, to really redouble its efforts in trying to focus monies on the rehabilitation of existing units. It’s probably the greatest thing that could be done to improve the quality of life and the quality of the housing stock here in the City of Norwich. Again, we appreciate your coming out today”.

**The Department Of Economic and Community Development Response:**

A staff person from the department’s Office of Housing Finance contacted Mr. Zametske to provide information regarding DECD programs available.

**Comments received at the November 22, 2005 Public Hearing:**

Verbatim proceedings of a hearing before the Department of Economic and Community Development in the matter of State of Connecticut’s Draft Action Plan for 2006 - 2007 for Housing and Community Development held on November 22, 2005 at 2:00 p.m., at the Hamden Government Center, 2750 Dixwell Avenue, Hamden, Connecticut, at which time the parties were represented as hereinbefore set forth. . . .

FACILITATOR DEBRA LANDRY: Today is Thursday, November 22, 2005 (sic). It is 2:00 p.m. I am Debra Landry of the Department of Economic and Community Development. I am here to accept comments on the State of Connecticut’s 2006 - 2007 Draft Action Plan for Housing and Community Development.

As no member of the public is currently present to provide comments, we will recess until such time as someone appears to provide testimony on the Plan.

(Whereupon, a recess was taken.)



MS. SARAH MORRILL: My name is Sarah Morrill and I am a Community Development Coordinator for the Town of East Haven and my comment is to possibly make the entire application process for the Small City's Grant available online.

FACILITATOR LANDRY: Since no member of the public, except for Sarah, has appeared to provide comments on the Draft Action Plan for Housing and Community Development, we will now close this hearing at 3:00 p.m.

(Whereupon, the hearing was adjourned at 3:00 p.m.)

**Comments received at the November 23, 2005 Public Hearing:**

Verbatim proceedings of a hearing before the Department of Economic and Community Development in the matter of State of Connecticut's Draft Action Plan for 2006 - 2007 for Housing and Community Development held on November 23, 2005 at 2:00 p.m., at 1712 Town Hall Street, Annex, Coventry, Connecticut, at which time the parties were represented as hereinbefore set forth.

FACILITATOR DEBRA LANDRY: Today is Wednesday, November 23rd. It is 2:00 p.m. I am Debra Landry of the Department of Economic and Community Development. I am here to accept comments on the State of Connecticut's 2006 - 2007 Draft Action Plan for Housing and Community Development.

There are members of the public here who would like to comment and I would like to ask that they identify themselves before they start speaking. Anybody who is ready to provide comment?

MR. JON ELSESEER: Good afternoon, I'm Jon Elseser. I serve as Coventry's Town Manager. I have been in the position for almost 17 years. I would like to first start out by saying that we are very appreciative of the Small City's Program and feel that it has made a huge difference to our community. We have been participating in the HUD Program since sometime in the early '80's and have successfully rehabbed over 350 houses. And we have done many projects that have helped, from consolidating loan programs for seniors, to handicapped accessibility, to public road and facilities improvements.

I am here today to ask that the State Plan be modified because the State Department of Economic and Community Development arbitrarily added a match requirement for a program that is not required to be matched by the Federal Government. The match is a hardship for smaller communities that are not affluent enough to come up with the match. It also steers projects only to popular projects, not necessarily projects for the people most in need. It is very difficult for communities to come up with cash mid budget year so that it does not go along with the application cycles. You basically have to have the match in place before you can apply and it's a chicken and an egg syndrome in that you are asking for money when you don't have an approved grant.

Setting aside funds for that uncertainty competes with the ongoing operational budgets. In the Town of Coventry it took us five referendums to get a budget passed. We were not able to get a budget passed till the middle of October. I can assure you that there would be no way that we would be able to hold money aside for the possibility that we would get a grant.

We are aware that the State, in its wisdom, has not required grants for housing rehab, so we're talking about all other programs. It is not fair for towns with our economic difficulties - - and I speak for most towns in eastern Connecticut -- it is not fair that we need to be able to come up with match. And, it is not required by the Federal Government. So I recommend since this match requirement is only one year in existence, that it be removed from the State Plan because it is not required, it stifles competition, it is an economic disincentive for smaller communities and less affluent communities to participate.

It steers projects towards politically popular and not need based projects. And finally, if the state chooses not to eliminate the match, or scale it on some type of affordability index so that the more affluent towns may be required the match and the less affluent towns not be required a match, that the State allow towns to use program income from program generated from loan repayments or other types of program income to meet the match.

So, I thank you for your time and consideration and urge the State to take seriously the needs of the less affluent communities with our less affluent population it makes it very difficult to serve the needs. Thank you.

FACILITATOR LANDRY: Thank you very much.

REPRESENTATIVE JOAN LEWIS: Good afternoon, I'm Joan Lewis. I'm the State Representative from the Eighth District and I also chaired the Town Council in Coventry for over 15 years. I am here today to request that the Department of Economic and Community Development eliminate the matching grant requirement of 10 percent outlined in the Draft 2006 - 2007 Action Plan for Housing and Community Development. As the Town Manager said, the 10 percent match requirement is not required by any HUD policy or the regulations or statutes for the State Community Development Block Grant Program.

And, while I understand DECD's reasoning for the match requirement, I do not agree with this policy. I believe a community shows its investment and dedication to the program by committing its resources to the application and approval process. And, like the Town Manager, I would like to say that I believe the CDBG Program is wonderful, it has done many great things in our community and provides much needed assistance to all the municipalities. However, the 10 percent match often restricts some of the communities that are most in need of this assistance from applying.

Small towns, like Coventry, without a large commercial tax base have trouble passing basic budgets to support town services. And this year, as the Manager said, it took five referendums before the budget passed and that is certainly not a problem unique to Coventry.

Another town that I represent, Vernon, also often goes to referendums for its budgets to pass. And certainly out here in Eastern Connecticut you see this all the time. And although your proposal indicates that rural communities with populations of 3,000 or less, which are classified as economically disadvantaged, under any state or federal authority are not subject to the match requirement. This waiver is really not broad enough to cover many of the other small towns and poorer towns that have great difficulty in coming up with this 10 percent match. Although in-kind matches are allowed, again, many of these smaller communities and poorer communities have limited staff and also find it very difficult to use staff for this purpose. As the primary purpose of the CDBG Program is to assist low and

moderate-income persons, and as many of these people live in the poorer communities that find it difficult to meet the match requirement, I respectfully request that DECD remove this requirement from its 2006 - 2000 (sic) Action Plan for Housing and Community Development. Thank you.

FACILITATOR LANDRY: Thank you very much for your comment.

MR. PETER HUCKINS: Hello. My name is Peter Huckins from Community Consulting. I am a consultant that works with towns exclusively in northeastern and eastern Connecticut that are some of the poorer towns in the State of Connecticut and a lot of these towns have found it difficult to obtain these, or reserve these matching funds of 10 percent. I know one community I was going to write a grant for just couldn't come up with the 10 percent so they chose not to be part of the process at all. But, as an alternative to eliminating the 10 percent match, I would like to maybe give another option. I know for the Steep Grants or the Urban Act Grants, originally they had a matching fund and they determined who could, or who needed to provide that match by the wealth of the town. And that was derived by the adjusted, equalized net grand list per capita. And what I suggest, if the 10 percent elimination is not possible, or you're not willing to do it, perhaps we could get a compromise and anyone above say a score of 85 on that list -- adjusted grand list -- perhaps would be granted exemption from the 10 percent.

Also, thank you for giving me an opportunity to speak, but I do have to question a little bit the timing of this particular public hearing, the day before Thanksgiving, where a lot of people are traveling, a lot of people have family obligations, and perhaps if you wanted a real -- a more -- more in attendance, or more people to speak on this Action Plan, perhaps it would have been -- a better date could have been chosen before the day before Thanksgiving. But, I thank you anyway for giving me a chance to tell you what I think. That's it. Thanks.

FACILITATOR LANDRY: Thank you very much for your comment. Are you expecting anyone else?

MR. ELSESER: I think other people couldn't make it today. I got several emails and they said that they would respond in writing to -- I guess it goes to --

MR. HUCKINS: Mike (indiscernible).

FACILITATOR LANDRY: Yes. That's correct.

MR. HUCKINS: And they have until December 15th to respond in writing?

FACILITATOR LANDRY: Yes. That's correct. Yes. I am going to close this for now then.

Since there are no other members of the public here to provide comment on the Draft Action Plan for Housing and Community Development, we will close this hearing at 3:00 p.m.

(Whereupon, the hearing was adjourned at 3:00 p.m.)

**Comments received during the 30-day Public Commentary Period:**

November 15, 2005

W. Michael Regan  
Community Development Assistant Administrator  
Department of Economic & Community Development  
505 Hudson Street  
Hartford, Connecticut 06106-7106

Subject: The Draft 2006-2007 Action Plan for Housing and Community  
Development

Dear Mr. Regan:

I am writing to you in response to the request for public comments concerning the implications of the Draft Action Plan for Small Cities Programs. As a municipal participant in the Community Development Block Grant program, I have seen the implications of a policy requirement that, in my opinion, has not satisfied the intent of its purpose, specifically the 10% local match requirement.

For five years, I was employed with a poor northeastern Connecticut municipality, which was forced to make significant cuts in programs geared towards the low-to-moderate income population, in order to pass a budget. The 10% match required for these grants, while provided by the community, required the community to make a choice of repairing community infrastructure, versus providing needed services, such as bus transportation.

In small, poor towns, elected officials rely on grant money to complete capital improvements, because there are no local funding sources for these improvements. In the end, securing grant funding proved to be the politically popular decision to make, as the low-to-moderate income constituents did not have the political capital needed to retain needed programs. This may be a cynical observation of the process, but from a political perspective, it is not a difficult decision to make, which is the unforeseen consequence of the state's rule.

While I currently work in a community that has not had to make difficult decisions of this magnitude, I feel compelled to forward my suggestion that the state reconsider the 10% local match requirement. Thank you for your time.

Sincerely,

Jason Vincent, AICP  
Director of Planning  
Department of Planning, Town of Stonington  
P. O. Box 352, 152 Elm Street  
Stonington, CT 06378  
(860) 535-5095, Fax (860) 535-1023

**State of Connecticut  
House of Representatives  
State Capitol  
Hartford, Connecticut 06106-1591**

**REPRESENTATIVE JOAN A. LEWIS**

EIGHTH DISTRICT  
48 ANTRIM ROAD  
COVENTRY, CT 06238  
HOME: (860) 742-3231  
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E-mail:Joan.Lewis@cga.ct.gov@cga.ct.gov

**VICE CHAIRMAN**

HIGHER EDUCATION AND EMPLOYMENT  
ADVANCEMENT COMMITTEE

**MEMBER**

APPROPRIATIONS COMMITTEE  
PLANNING & DEVELOPMENT COMMITTEE

November 23, 2005

W. Michael Regan  
Community Development Assistant Administrator  
Compliance Office and Planning/Program Support  
Department of Economic & Community Development  
505 Hudson Street  
Hartford, CT 06106-7106

Dear Mr. Regan:

I am writing to request that DECD eliminate the match requirement of ten percent presented in their draft 2006-2007 Action Plan for Housing and Community Development.

I am attaching a copy of my comments made at the Hearing held in Coventry on November 23<sup>rd</sup>.

Thank you for your consideration.

Very truly yours,

Joan A. Lewis  
State Representative 8<sup>th</sup> District

**State of Connecticut  
House of Representatives  
State Capitol  
Hartford, Connecticut 06106-1591**

**REPRESENTATIVE JOAN A. LEWIS**

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48 ANTRIM ROAD  
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**VICE CHAIRMAN**

HIGHER EDUCATION AND EMPLOYMENT  
ADVANCEMENT COMMITTEE

**MEMBER**

APPROPRIATIONS COMMITTEE  
PLANNING & DEVELOPMENT COMMITTEE

I am here today to request that the Department of Economic and Community Development eliminate the matching grant requirement of ten percent outlined in the draft 2006-2007 Action Plan for Housing and Community Development.

The 10% match requirement is not required by any HUD policy or the regulations or statutes for the State Community Development Block Grant Program; and while I understand DECD's reasoning for the match requirement, I do not agree with this policy. I believe a community shows its investment and dedication to the program by committing its resources to the application and approval process.

The CDBG program is wonderful and provides much needed assistance to communities; however, the 10% match often restricts some of the communities most in need of this assistance from applying.

Small towns like Coventry without a large commercial tax base have trouble passing basic budgets to support town services. This year it took five referendums before the budget passed and this is certainly not a problem unique to Coventry.

Although your proposal indicates that rural communities with populations of 3,000 or less, which are classified, as economically disadvantaged under any state or federal authority are not subject to the match requirement, this special waiver is not broad enough to cover many of the other small towns and poorer towns that have great difficulty in coming up with the 10% match.

Although in-kind matches are allowed, communities with limited staff often find it impossible or very difficult to use staff for this purpose.

As the primary objective of the CDBG Program is to assist low-and-moderate income persons, and as many of these people live in the poorer communities that find it difficult to meet the match requirement, I respectfully request that DECD remove this requirement from its 2006-2007 Action Plan for Housing and Community Development.

**Connecticut Council of Small Towns**  
**Phone: 860-676-0770•Fax:860-676-2662• Email:brussell@ctcost.org**

**Fax Memorandum**

**Rush To:** Commissioner James Abromaitis  
CT Department of Economic & Community Development

**From:** Barton Russell, Executive Director

**Re:** DECD Matching Requirement

**Date:** November 28, 2005

I am writing on behalf of the Connecticut Council of Small Towns (COST) to urge your Department to eliminate the 10% matching grant requirement contained in its draft 2006-07 Action Plan for Housing and Community Development.

COST represents more than 100 smaller municipalities statewide, which, by their very nature, usually have limited financial and staff resources. These jurisdictions, because of such restricted administrative and financial capabilities, often struggle to take advantage of the very few grant programs for which they are eligible – and which they desperately need.

We understand the U.S. Department of Housing and Urban Development does not require the states to establish this match requirement. I represent COST on the Board of Directors of the National Association of Town and Townships, which represents more than 12,000 small towns throughout the United States, and have not heard of other states that require a 10% match of their smaller municipalities.

We certainly understand the theoretical rationale for requiring a match (i.e., some believe it demonstrates more of a local commitment to such projects). However, the vast majority of Connecticut smaller towns and cities eligible to apply for a CDBG grant do not do so half-heartedly, simply because the funding exists. They apply for such assistance because of a real local need, often exacerbated by economic distress and/or a limited or declining commercial tax base.

COST believes that the 10% match requirement contained in your Department's 2006-07 Action Plan for Housing and Community Development will have the ironic, and unfortunate, effect of preventing many poorer communities – those that need the assistance most – from participating. We again urge your assistance and leadership in getting the requirement eliminated. Thank you for your thoughtful consideration.

**State of Connecticut  
Senate  
State Capitol  
Hartford, Connecticut 06106-1591**

**SENATOR TONY GUGLIELMO**  
THIRTY-FIFTH DISTRICT  
100 STAFFIRD STREET  
STAFFORD SPRINGS, CONNECTICUT 06076  
TELEPHONES  
CAPITOL: (860) 240-8800  
TOLL FREE: 1-800-842-1421  
E-mail:Anthony. Guglielmo@cga.ct.gov

**ASSISTANT MINORITY LEADER**  
  
**RANKING MEMBER**  
LABOR AND PUBLIC EMPLOYEES COMMITTEE  
PUBLIC SAFETY AND SECURITY COMMITTEE  
  
**MEMBER**  
FINANCE, REVENUE AND BONDING COMMITTEE

December 8, 2005

Commissioner James F. Abromaitis  
Economic & Community Development  
505 Hudson Street  
Hartford, CT 06106-7106

Dear Jim:

I would like to make written comments on the DECD Draft Action Plan that will be coming before you on December 15<sup>th</sup>. The current 10% match requirement is a huge burden on small towns. Even municipalities, which do not appear to be poor, from the standpoint of their average median incomes, often lack the tax base needed to provide the 10% match. For example, a \$500,000 DECD grant, which is a wonderful grant, requires a \$50,000 match from the town. With the rising cost of fuel, wages and so forth it is almost impossible for most of these small towns to come up with that large a match. Having served on the local Board of Finance many years ago, I can tell you for a fact that not much of the municipal budget is discretionary. So much of it is tied into negotiated salaries, group health insurance, mandated pension plans, and other fixed expenses that there is not much "wiggle room" that would enable a town to come up with the 10% match.

Jim, I share your concern about timely expenditure of these funds, but that has not been a problem in the past. In fact, the 10% match itself has caused delays because it takes time for municipalities to gather up that type of cash or matching services. In the smaller towns this is even more difficult, as the towns often do not have full-time planning and engineering staff so they are not able to come up with in-kind services that they can put toward their matching obligation.

Jim, if you have any question on this please do not hesitate to contact me.



Sincerely,

Tony Guglielmo  
State Senator

TG/clm

cc: Beverly Bellody  
Town of Tolland  
Tolland Town Hall  
21 Tolland Green  
Tolland, CT 06084

cc: The Honorable Allen Bacchiochi  
First Selectman, Town of Stafford  
1 Main Street  
Stafford Springs, CT 06076

cc: Representative Penny Bacchiochi  
LOB, Room 4071

**Stafford Small Cities Program  
Housing Rehabilitation Program  
1 Main Street  
Warren Memorial Town Hall  
Stafford, CT 06076  
(860) 684-5567**

December 8, 2005

W. Michael Regan  
Community Development Assistant Administrator  
Compliance Office and Planning/Program Support  
Department of Economic & Community Development  
505 Hudson Street  
Hartford, CT 06106-7106

Dear Mr. Regan:

I work for Community Opportunities Group, Inc., administering the Small Cities Programs in the Towns of Stafford and Ellington. I would like to take this opportunity to comment on the proposed 2006 Action Plan. I regret that I was unable to attend any of the public hearings on the plan that took place last week due to prior commitments that could not be rearranged on such short notice.

I want to begin by saying that I was pleased that the Department of Economic and Community Development is going to continue the Open Funding process for the Small Cities Grants. This open funding process enables the Towns to apply for funds when a project is ready to proceed and allows for a relatively short period of time between programs in the case of ongoing Housing Rehabilitation Programs.

**10% Match Requirement**

On behalf of both Ellington and Stafford, I would like to express our concern for the 10% match requirement as listed on page 16 of the Action Plan. This match requirement poses a hardship for both of these smaller Towns. Neither Town has adequate staff to meet the match requirement with in-house labor and must put up cash to meet the match. In today's fiscal environment, finding money to meet the match has proven to be difficult.

Neither the federal regulations governing the Small Cities Program, nor other State programs with similar purposes such as the STEAP and Urban Action Grant Programs require a match. In this context, the match seems unduly burdensome.

Furthermore, the match delays the expenditure of Small Cities Funds in two ways. First, it takes time to raise the match, thereby delaying the start of program, and second, it reduces the amount of CDBG funds that are spent on a project.

The smaller towns do not have an adequate tax base to raise the match easily. A \$50,000 match for a \$500,000 grant is a lot of money for a town of 10,000 people. The process of raising the money is cumbersome and takes numerous public meetings. These towns do not have this kind of funding readily accessible in reserve accounts. They need the money for basic services like public safety and schools.

Eliminating this match requirement would help Connecticut assist its most needy communities by removing a barrier to their participation in the Small Cities Program.

## **Goals**

In the 2005-2006 Goals and Objectives Matrix on Page 32 of the Action Plan, it says that DECD will "Support 4 single-family moderate rehabilitation projects each year (with up to 100 units each) in CDBG eligible communities."

There are many more than four CDBG eligible communities in Connecticut that could benefit from having a single-family moderate rehabilitation program and this goal seems unreasonably low.

In the past, DECD has set a cap of \$500,000 per housing rehabilitation grant. If that cap stays in place, and if only four programs are funded, only \$2,000,000, or approximately 13%, of Connecticut's CDBG allocation will go to single-family moderate rehabilitation.

Furthermore, the number of units alluded to is unreasonable. At an average cost of rehabilitation of \$20,000 a unit, a program of 100 units would cost \$2,000,000. This seems both impractical to administer and an inequitable distribution of funds among communities.

The direct impact of the housing rehabilitation program and its multiplier effects are so great that I would encourage you to allocate more resources than this to this worthwhile program.

Thank you for the opportunity to comment on the 2006 Action Plan.

Sincerely yours,

Fran VanTreese  
Program Manager

**WINDHAM REGION COUNCIL OF GOVERNMENTS**

968 Main Street, Willimantic Connecticut 06226

(860) 456-2221/Fax: (860) 456-1235 Email: [wincog@snet.net](mailto:wincog@snet.net)

Ashford Chaplin Columbia Coventry Hampton Lebanon Mansfield Scotland  
Windham

---

December 14, 2005

W. Michael Regan,  
Community Development Assistant Administrator  
Compliance Office and Planning/Program Support  
Department of Economic and Community Development  
505 Hudson St.  
Hartford, CT 06106-7106

SUBJECT: Draft 2006-2007 Action Plan  
For Housing and Community  
Development

Dear Mr. Regan,

Staff of the Windham Region Council of Governments has reviewed DECD's draft 2006-2007 Action Plan for Housing and Community Development. On behalf of the Windham Region Council of Governments, I am writing to support the comments on the plan submitted by the Town of Coventry and by the Council of Small Towns, and to join them in urging DECD to eliminate the 10% local match requirements for non-housing CDGB grants.

Elimination of this local match will improve access to these funds by the communities that are most in need.

Thank you for the opportunity to comment on the draft plan.

Sincerely,

Barbara C. Buddington  
Executive Director

Cc: John Elsesser, Coventry Town Manager

## **Summary Of Public Comments Received:**

**Comments received during the 30-day Public Comment period of 11/15/05-12/15/05**

### **Public Hearings:**

1. Online Application: Online availability of application process for Small Cities CDBG program.
2. 10% Match Requirement: Elimination of the matching grant requirement of 10% for the Small Cities CDBG program as outlined in the Draft 2006-07 Action Plan for Housing & Community Development.
3. 10% Match Requirement: Consider using a score of 85 on the adjusted grand list as an exception from the 10% match requirement for the Small Cities CDBG program.

### **Public Comment Letters:**

1. Open Funding Application Process: Continue the open funding application process for the Small Cities CDBG program
2. 10% Match Requirement: Eliminate the 10% local match requirement for the Small Cities CDBG program
3. Goals: Goal on page 32, "Support 4 single-family moderate rehabilitation projects each year (with up to 100 units each) in CDBG eligible communities " seems unreasonably low. There are more than 4 eligible communities and based on a cap of \$500,000 per project equals \$2,000,000 or only 13% of allocation.

## **DECD Response To Public Comments Received:**

**Comments received during the 30-day Public Comment period of 11/15/05-12/15/05**

### **Public Hearings:**

1. Online Application: The department is presently investigating online application possibilities as part of its charge to create a single development application with CHFA. There is a likelihood that other department application processes such as Small Cities CDBG program would follow.
2. 10% match requirement: See response below (number two).
3. 10% match requirement: See response below (number two).

### **Public Comment letters:**

1. Open Funding Application Process: The department will continue this process.
2. 10% match requirement: The 10% match requirement was the subject of much discussion at last year's legislative CDBG hearing. It was also the subject of the majority of comments received during the development of the 2006-2007 Action Plan.

The 2006-2007 Action Plan requires that applicants for state administered CDBG funds must provide a minimum local contribution of 10% of the amount requested from DECD. The match may include "in kind" contributions. This match does not apply to housing, economic development or planning projects and rural communities with populations of 3,000 or less, classified as economically disadvantaged under any state or federal authority, are not subject to the match requirement. A waiver of the 10% local contribution may be requested at the time of application. The Commissioner, at his sole discretion, may approve or disapprove the appeal.

This match requirement is neither federally nor statutorily mandated. It was implemented by the DECD as a means to stretch limited federal funds to more municipalities and to provide a local incentive to move projects along in a timely fashion. This is critical, especially in light of limited federal funds available to 147 of our municipalities and federal expenditure requirements. In addition, DECD felt that this requirement would put the CDBG program more in line with other DECD programs which all require a match of some kind.

After careful consideration of the comments received during the development of this Action Plan, a review of Connecticut's current fiscal situation and the policies of other states with regard to the administration of the CDBG program, DECD, in consultation with the Office of Policy and Management, has decided to retain the 10% match in the Small Cities CDBG program for program year 2006-2007.

DECD has decided to retain the 10% match as part of its Small Cities CDBG program for the following reasons:

- DECD's research indicates that most states' require a match under their Small Cities programs.
  - DECD believes that a 10% match will allow us to make the most of our limited resources and enable us to fund more projects – which is more important than ever as the federal government has reduced the CDBG program's level of funding.
  - DECD believes that the Small Cities applicants would have a greater commitment to the project if they had a financial stake in it.
  - DECD believes that Small Cities Applicants will present more thoroughly thought out and planned projects and execute their projects in a more timely and efficient manner if they have a financial stake in the project.
  - The 10% match only applies to public facility and public service projects (housing, economic development and planning projects are exempt).
  - "In-Kind" contributions may be used as part of the 10% match.
  - Rural communities with populations of 3,000 or less, classified as economically disadvantaged under any state or federal authority, are not subject to the match requirement.
  - A municipality may submit a request to waive the 10% match – to date the DECD has not received a single request to waive the match.
3. Goals: Goals contained in the Action Plan are minimums not maximums.

## **2006 ACTION PLAN – ATTACHMENT B**

### **Copies of Citizen Participation Documents:**

- Legal Notices for Public Comment Period and Public Hearings.
- Notice to CEO's of Public Comment Period and Public Hearings.

**NOTICE OF PUBLIC COMMENT PERIOD  
THE STATE OF CONNECTICUT  
DEPARTMENT OF ECONOMIC AND COMMUNITY DEVELOPMENT  
IS SEEKING PUBLIC COMMENT ON THE DRAFT  
2006-2007 ACTION PLAN FOR HOUSING AND  
COMMUNITY DEVELOPMENT**

Public Hearings on housing and community development needs in Connecticut's communities will be held to solicit input into the development of the state's 2006-2007 annual Action Plan for Housing and Community Development. The hearings will be held at the following times and locations:

**Rocky Hill**

2:00 p.m.  
September 20, 2005  
CERC  
Meeting Room  
805 Brook Street, Bldg. 4  
Rocky Hill, Connecticut

**Norwich**

2:00 p.m.  
September 22, 2005  
Norwich City Hall  
3<sup>rd</sup> Floor, Room 335  
100 Broadway  
Norwich, Connecticut

All state residents are urged to attend and provide oral or written comments on housing and community development needs in Connecticut's communities. This information will be used in the development of the state's 2006-2007 Action Plan. Copies of last year's Action Plan and the state's 5 year Consolidated Plan are available at the Department of Economic & Community Development's web site, [www.DECD.org](http://www.DECD.org) and at the State Library.

Written comments may be sent to W. Michael Regan, Community Development Assistant Administrator, Compliance Office and Planning/Program Support, Department of Economic & Community Development, 505 Hudson Street, Hartford, CT 06106-7106.

Department of Economic & Community Development programs are administered in a nondiscriminatory manner, consistent with equal employment opportunities, affirmative action, and fair housing requirements. Questions, concerns, complaints or requests for information in alternative formats must be directed to Rick Robbins, ADA (504) Coordinator at 860-566-1755.



**NOTICE OF PUBLIC COMMENT PERIOD  
THE STATE OF CONNECTICUT  
DEPARTMENT OF ECONOMIC AND COMMUNITY DEVELOPMENT  
IS SEEKING PUBLIC COMMENT ON THE DRAFT  
2006-2007 ACTION PLAN FOR HOUSING AND  
COMMUNITY DEVELOPMENT**

A thirty-day public examination and comment period will begin November 15, 2005 and end December 15, 2005. Public Hearings on the draft 2006-2007 annual Action Plan For Housing and Community Development will be held as follows:

**Rocky Hill**

2:00 p.m.  
Nov. 21, 2005  
CERC  
Meeting Room  
805 Brook Street, Bldg. 4  
Rocky Hill, Connecticut

**Coventry**

2:00 p.m.  
Nov. 23, 2005  
Coventry Town Hall Annex  
1712 Main Street (Route 31)  
Coventry, Connecticut

**Hamden**

2:00 p.m.  
Nov. 22, 2005  
Hamden Gov. Center  
3<sup>rd</sup> Floor Conference Room  
2750 Dixwell Avenue  
Hamden, Connecticut

All state residents are urged to attend and provide oral or written comments on housing and community development needs in Connecticut's communities. This information will be used in the development of the state's 2006-2007 Action Plan. Copies of last year's Action Plan and the state's 5 year Consolidated Plan are available at the Department of Economic & Community Development's web site, [www.DECD.org](http://www.DECD.org) and at the State Library.

Written comments may be sent to W. Michael Regan, Community Development Assistant Administrator, Compliance Office and Planning/Program Support, Department of Economic & Community Development, 505 Hudson Street, Hartford, CT 06106-7106.

Department of Economic & Community Development programs are administered in a nondiscriminatory manner, consistent with equal employment opportunities, affirmative action, and fair housing requirements. Questions, concerns, complaints or requests for information in alternative formats must be directed to Rick Robbins, ADA (504) Coordinator at 860-566-1755.

**Chief Elected Officials**

**Notice** COPS 05-21

Distribution Date: November 14, 2005

**Effective: Immediately**

**SUBJECT: PUBLIC COMMENTARY PERIOD/HEARINGS—DRAFT 2006-07  
ANNUAL ACTION PLAN FOR HOUSING AND COMMUNITY  
DEVELOPMENT**

The State of Connecticut is developing its 2006-2007 Annual Action Plan for Housing and Community Development for submission to the U.S. Department of Housing & Urban Development. In accordance with federal requirements, we are conducting a 30-day public commentary period and public hearings to ascertain comments on the draft plan in regard to the proposed expenditure of federal program funds such as HOME Investment Partnerships Program, Small Cities Community Development Block Grant, Emergency Shelter Grant, and Housing Opportunities for Persons with AIDS.

The Department of Economic and Community Development has scheduled public hearings in three locations throughout the state, as indicated in the attached notice. We hope that you will continue to participate in the process to develop the final Action Plan document and attend at least one of the public hearings.

Please feel free to extend this invitation to your local Community Development Director or Economic Development Director.

Attachment

**VII. 2006 ACTION PLAN – ATTACHMENT C**

**Applications for Assistance (HUD form 424) and Certifications**

APPLICATION FOR  
FEDERAL ASSISTANCE

<b>1. TYPE OF SUBMISSION:</b> Application <input type="checkbox"/> Construction <input checked="" type="checkbox"/> Non-Construction		<b>2. DATE SUBMITTED</b>		Applicant Identifier	
Pre-application <input type="checkbox"/> Construction <input type="checkbox"/> Non-Construction		<b>3. DATE RECEIVED BY STATE</b>		State Application Identifier	
		<b>4. DATE RECEIVED BY FEDERAL AGENCY</b>		Federal Identifier	
<b>5. APPLICANT INFORMATION</b>					
Legal Name: CT. State Department of Economic and Community Development			<b>Organizational Unit:</b> Department: Compliance Office and Planning/ Program Support		
Organizational DUNS: 807851043			Division: Planning and Research Unit		
<b>Address:</b> Street: 505 Hudson Street City: Hartford County:			<b>Name and telephone number of person to be contacted on matters involving this application (give area code)</b> Prefix: First Name: W. Michael Middle Name		
State: Connecticut Zip Code 06106-7106			Last Name Regan		
Country: USA			Email: michael.regan@po.state.ct.us		
<b>6. EMPLOYER IDENTIFICATION NUMBER (EIN):</b> 06-1267643			Phone Number (give area code) 860-270-8039		Fax Number (give area code) 860-270-8200
<b>8. TYPE OF APPLICATION:</b> <input checked="" type="checkbox"/> New <input type="checkbox"/> Continuation <input type="checkbox"/> Revision If Revision, enter appropriate letter(s) in box(es) (See back of form for description of letters.) Other (specify)			<b>7. TYPE OF APPLICANT:</b> (See back of form for Application Types) A. State Agency Other (specify)		
<b>10. CATALOG OF FEDERAL DOMESTIC ASSISTANCE NUMBER:</b> TITLE (Name of Program): Small Cities Community Development Block Grant Program			<b>9. NAME OF FEDERAL AGENCY:</b> U.S. Department of Housing and Urban Development		
<b>12. AREAS AFFECTED BY PROJECT (Cities, Counties, States, etc.):</b> statewide, Connecticut			<b>11. DESCRIPTIVE TITLE OF APPLICANT'S PROJECT:</b> Community Development Block Grant Program for Small Cities		
<b>13. PROPOSED PROJECT</b> Start Date: 7/1/06 Ending Date: 6/30/07			<b>14. CONGRESSIONAL DISTRICTS OF:</b> a. Applicant 1st,2nd,3rd,4th,5th b. Project 1st,2nd,3rd,4th,5th		
<b>15. ESTIMATED FUNDING:</b>			<b>16. IS APPLICATION SUBJECT TO REVIEW BY STATE EXECUTIVE ORDER 12372 PROCESS?</b>		
a. Federal	\$	13,645,095 <sup>00</sup>	a. Yes. <input type="checkbox"/> THIS PREAPPLICATION/APPLICATION WAS MADE AVAILABLE TO THE STATE EXECUTIVE ORDER 12372 PROCESS FOR REVIEW ON DATE:		
b. Applicant	\$	<sup>00</sup>	b. No. <input type="checkbox"/> PROGRAM IS NOT COVERED BY E. O. 12372		
c. State	\$	<sup>00</sup>	<input checked="" type="checkbox"/> OR PROGRAM HAS NOT BEEN SELECTED BY STATE FOR REVIEW		
d. Local	\$	<sup>00</sup>	<b>17. IS THE APPLICANT DELINQUENT ON ANY FEDERAL DEBT?</b>		
e. Other	\$	<sup>00</sup>	<input type="checkbox"/> Yes If "Yes" attach an explanation. <input checked="" type="checkbox"/> No		
f. Program Income	\$	<sup>00</sup>			
g. TOTAL	\$	13,645,095 <sup>00</sup>			
<b>18. TO THE BEST OF MY KNOWLEDGE AND BELIEF, ALL DATA IN THIS APPLICATION/PREAPPLICATION ARE TRUE AND CORRECT. THE DOCUMENT HAS BEEN DULY AUTHORIZED BY THE GOVERNING BODY OF THE APPLICANT AND THE APPLICANT WILL COMPLY WITH THE ATTACHED ASSURANCES IF THE ASSISTANCE IS AWARDED.</b>					
<b>a. Authorized Representative</b>					
Prefix	First Name James		Middle Name F.		
Last Name Abromaitis			Suffix		
b. Title Commissioner, CT State Department of Economic and Community Development			c. Telephone Number (give area code) 860-270-8009		
d. Signature of Authorized Representative			e. Date Signed 4-24-06		

Previous Edition Usable  
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Standard Form 424 (Rev.9-2003)  
Prescribed by OMB Circular A-102

**APPLICATION FOR  
FEDERAL ASSISTANCE**

<b>1. TYPE OF SUBMISSION:</b> Application <input type="checkbox"/> Construction <input checked="" type="checkbox"/> Non-Construction		<b>2. DATE SUBMITTED</b>	Applicant Identifier
Pre-application <input type="checkbox"/> Construction <input type="checkbox"/> Non-Construction		<b>3. DATE RECEIVED BY STATE</b>	State Application Identifier
		<b>4. DATE RECEIVED BY FEDERAL AGENCY</b>	Federal Identifier
<b>5. APPLICANT INFORMATION</b>			
Legal Name: CT. State Department of Economic and Community Development		<b>Organizational Unit:</b> Department: Compliance Office and Planning/ Program Support	
Organizational DUNS: 807851043		Division: Planning and Research Unit	
<b>Address:</b> Street: 505 Hudson Street City: Hartford County:		<b>Name and telephone number of person to be contacted on matters involving this application (give area code)</b> Prefix: Middle Name: First Name: W. Michael	
State: Connecticut Zip Code: 06106-7106		Last Name: Regan	
Country: USA		Suffix:	
<b>6. EMPLOYER IDENTIFICATION NUMBER (EIN):</b> 06-1267643		Email: michael.regan@po.state.ct.us	
		Phone Number (give area code): 860-270-8039	
		Fax Number (give area code): 860-270-8200	
<b>8. TYPE OF APPLICATION:</b> <input checked="" type="checkbox"/> New <input type="checkbox"/> Continuation <input type="checkbox"/> Revision If Revision, enter appropriate letter(s) in box(es) (See back of form for description of letters.) Other (specify) <input type="checkbox"/> <input type="checkbox"/>		<b>7. TYPE OF APPLICANT:</b> (See back of form for Application Types) A. State Agency Other (specify)	
<b>10. CATALOG OF FEDERAL DOMESTIC ASSISTANCE NUMBER:</b> TITLE (Name of Program): HOME Investment Partnerships Program 14-239		<b>9. NAME OF FEDERAL AGENCY:</b> U.S. Department of Housing and Urban Development	
<b>12. AREAS AFFECTED BY PROJECT (Cities, Counties, States, etc.):</b> statewide, Connecticut		<b>11. DESCRIPTIVE TITLE OF APPLICANT'S PROJECT:</b> HOME Investment Partnerships Program and the American Dream Downpayment Initiative	
<b>13. PROPOSED PROJECT</b> Start Date: 7/1/06 Ending Date: 6/30/07		<b>14. CONGRESSIONAL DISTRICTS OF:</b> a. Applicant 1st,2nd,3rd,4th,5th b. Project 1st,2nd,3rd,4th,5th	
<b>15. ESTIMATED FUNDING:</b>		<b>16. IS APPLICATION SUBJECT TO REVIEW BY STATE EXECUTIVE ORDER 12372 PROCESS?</b>	
a. Federal	\$ 12,512,547 <sup>00</sup>	a. Yes. <input type="checkbox"/> THIS PREAPPLICATION/APPLICATION WAS MADE AVAILABLE TO THE STATE EXECUTIVE ORDER 12372 PROCESS FOR REVIEW ON DATE:	
b. Applicant	\$ <sup>00</sup>	b. No. <input type="checkbox"/> PROGRAM IS NOT COVERED BY E. O. 12372	
c. State	\$ <sup>00</sup>	<input checked="" type="checkbox"/> OR PROGRAM HAS NOT BEEN SELECTED BY STATE FOR REVIEW	
d. Local	\$ <sup>00</sup>	<b>17. IS THE APPLICANT DELINQUENT ON ANY FEDERAL DEBT?</b>	
e. Other	\$ <sup>00</sup>	<input type="checkbox"/> Yes if "Yes" attach an explanation. <input checked="" type="checkbox"/> No	
f. Program Income	\$ <sup>00</sup>		
g. TOTAL	\$ 12,512,547 <sup>00</sup>		
<b>18. TO THE BEST OF MY KNOWLEDGE AND BELIEF, ALL DATA IN THIS APPLICATION/PREAPPLICATION ARE TRUE AND CORRECT. THE DOCUMENT HAS BEEN DULY AUTHORIZED BY THE GOVERNING BODY OF THE APPLICANT AND THE APPLICANT WILL COMPLY WITH THE ATTACHED ASSURANCES IF THE ASSISTANCE IS AWARDED.</b>			
<b>a. Authorized Representative</b>			
Prefix		Middle Name	
First Name James		F.	
Last Name Abromaitis		Suffix	
b. Title Commissioner, CT State Department of Economic and Community Development		c. Telephone Number (give area code) 860-270-8009	
d. Signature of Authorized Representative		e. Date Signed 7-27-06	



# CPMP State Grantee Certifications

Many elements of this document may be completed electronically, however a signature must be manually applied and the document must be submitted

in paper form to the Field Office.

- This certification does not apply.  
 This certification is applicable. See signature on the last page.

## STATE CERTIFICATIONS

In accordance with the applicable statutes and the regulations governing the consolidated plan regulations, the jurisdiction certifies that:

**Affirmatively Further Fair Housing** -- The State will affirmatively further fair housing, which means it will conduct an analysis of impediments to fair housing choice within the state, take appropriate actions to overcome the effects of any impediments identified through that analysis, and maintain records reflecting that analysis and actions in this regard.

**Anti-displacement and Relocation Plan** -- It will comply with the acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended, and implementing regulations at 49 CFR 24; and it has in effect and is following a residential antidisplacement and relocation assistance plan required under section 104(d) of the Housing and Community Development Act of 1974, as amended, in connection with any activity assisted with funding under the CDBG or HOME programs.

**Drug Free Workplace** -- It will or will continue to provide a drug-free workplace by:

1. Publishing a statement notifying employees that the unlawful manufacture, distribution, dispensing, possession, or use of a controlled substance is prohibited in the grantee's workplace and specifying the actions that will be taken against employees for violation of such prohibition;
2. Establishing an ongoing drug-free awareness program to inform employees about --
  - a. The dangers of drug abuse in the workplace;
  - b. The grantee's policy of maintaining a drug-free workplace;
  - c. Any available drug counseling, rehabilitation, and employee assistance programs; and
  - d. The penalties that may be imposed upon employees for drug abuse violations occurring in the workplace;
3. Making it a requirement that each employee to be engaged in the performance of the grant be given a copy of the statement required by paragraph 1;
4. Notifying the employee in the statement required by paragraph 1 that, as a condition of employment under the grant, the employee will --
  - a. Abide by the terms of the statement; and
  - b. Notify the employer in writing of his or her conviction for a violation of a criminal drug statute occurring in the workplace no later than five calendar days after such conviction;
5. Notifying the agency in writing, within ten calendar days after receiving notice under subparagraph 4(b) from an employee or otherwise receiving actual notice of such conviction. Employers of convicted employees must provide notice, including position title, to every grant officer or other designee on whose grant activity the convicted employee was working, unless the Federal agency has designated a central point for the receipt of such notices. Notice shall include the identification number(s) of each affected grant;
6. Taking one of the following actions, within 30 calendar days of receiving notice under subparagraph 4(b), with respect to any employee who is so convicted --
  - a. Taking appropriate personnel action against such an employee, up to and including termination, consistent with the requirements of the Rehabilitation Act of 1973, as amended; or
  - b. Requiring such employee to participate satisfactorily in a drug abuse assistance or rehabilitation program approved for such purposes by a Federal, State, or local health, law enforcement, or other appropriate agency;
7. Making a good faith effort to continue to maintain a drug-free workplace through implementation of paragraphs 1, 2, 3, 4, 5 and 6.

**Anti-Lobbying** -- To the best of the state's knowledge and belief:

1. No Federal appropriated funds have been paid or will be paid, by or on behalf of it, to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with the awarding of any Federal contract, the making of any Federal grant, the making of any Federal loan, the entering into of any cooperative agreement, and the extension, continuation, renewal, amendment, or modification of any Federal contract, grant, loan, or cooperative agreement;
2. If any funds other than Federal appropriated funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this Federal contract, grant, loan, or cooperative agreement, it will complete and submit Standard Form-LLL, "Disclosure Form to Report Lobbying," in accordance with its instructions; and
3. It will require that the language of paragraph 1 and 2 of this anti-lobbying certification be included in the award documents for all subawards at all tiers (including subcontracts, subgrants, and contracts under grants, loans, and cooperative agreements) and that all subrecipients shall certify and disclose accordingly.

**Authority of State** -- The submission of the consolidated plan is authorized under State law and the State possesses the legal authority to carry out the programs under the consolidated plan for which it is seeking funding, in accordance with applicable HUD regulations.

**Consistency with plan** -- The housing activities to be undertaken with CDBG, HOME, ESG, and HOPWA funds are consistent with the strategic plan.

**Section 3** -- It will comply with section 3 of the Housing and Urban Development Act of 1968, and implementing regulations at 24 CFR Part 135.

  
\_\_\_\_\_  
Signature/Authorized Official

7-24-06  
Date

James F. Abromaitis

Name  
Commissioner, CT. DECD

Title  
505 Hudson Street

Address  
Hartford, CT. 06106-7106

City/State/Zip  
860-270-8009

Telephone Number

- This certification does not apply.  
 This certification is applicable. See signature on the last page.

### Specific CDBG Certifications

The State certifies that:

**Citizen Participation** -- It is in full compliance and following a detailed citizen participation plan that satisfies the requirements of 24 CFR §91.115 and each unit of general local government that receives assistance from the State is or will be following a detailed citizen participation plan that satisfies the requirements of 24 CFR §570.486.

**Consultation with Local Governments** -- It has or will comply with the following:

1. It has consulted with affected units of local government in the nonentitlement area of the State in determining the method of distribution of funding;
2. It engages in or will engage in planning for community development activities;
3. It provides or will provide technical assistance to units of local government in connection with community development programs; and
4. It will not refuse to distribute funds to any unit of general local government on the basis of the particular eligible activity selected by the unit of general local government to meet its community development needs, except that a State is not prevented from establishing priorities in distributing funding on the basis of the activities selected.

**Local Needs Identification** -- It will require each unit of general local government to be funded to identify its community development and housing needs, including the needs of low-income and moderate-income families, and the activities to be undertaken to meet these needs.

**Community Development Plan** -- Its consolidated housing and community development plan identifies community development and housing needs and specifies both short-term and long-term community development objectives that have been developed in accordance with the primary objectives of Title I of the Housing and Community Development Act of 1974, as amended. (See 24 CFR 570.2 and 24 CFR part 570)

**Use of Funds** -- It has complied with the following criteria:

1. Maximum Feasible Priority - With respect to activities expected to be assisted with CDBG funds, it certifies that it has developed its Action Plan so as to give maximum feasible priority to activities which benefit low and moderate income families or aid in the prevention or elimination of slums or blight. The Action Plan may also include activities which the grantee certifies are designed to meet other community development needs having a particular urgency because existing conditions pose a serious and immediate threat to the health or welfare of the community, and other financial resources are not available);
2. Overall Benefit - The aggregate use of CDBG funds including section 108 guaranteed loans during program year(s) 2006, 2007 2008 (a period specified by the grantee consisting of ~~one, two,~~ or three specific consecutive program years), shall principally benefit persons of low and moderate income in a manner that ensures that at least 70 percent of the amount is expended for activities that benefit such persons during the designated period;
3. Special Assessments - The state will require units of general local government that receive CDBG funds to certify to the following:

It will not attempt to recover any capital costs of public improvements assisted with CDBG funds including Section 108 loan guaranteed funds by assessing any amount against properties owned and occupied by persons of low and moderate income, including any fee charged or assessment made as a condition of obtaining access to such public improvements.

However, if CDBG funds are used to pay the proportion of a fee or assessment that relates to the capital



Jurisdiction

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costs of public improvements (assisted in part with CDBG funds) financed from other revenue sources, an assessment or charge may be made against the property with respect to the public improvements financed by a source other than CDBG funds.

It will not attempt to recover any capital costs of public improvements assisted with CDBG funds, including Section 108, unless CDBG funds are used to pay the proportion of fee or assessment attributable to the capital costs of public improvements financed from other revenue sources. In this case, an assessment or charge may be made against the property with respect to the public improvements financed by a source other than CDBG funds. Also, in the case of properties owned and occupied by moderate-income (not low-income) families, an assessment or charge may be made against the property for public improvements financed by a source other than CDBG funds if the jurisdiction certifies that it lacks CDBG funds to cover the assessment.

**Excessive Force** -- It will require units of general local government that receive CDBG funds to certify that they have adopted and are enforcing:

1. A policy prohibiting the use of excessive force by law enforcement agencies within its jurisdiction against any individuals engaged in non-violent civil rights demonstrations; and
2. A policy of enforcing applicable State and local laws against physically barring entrance to or exit from a facility or location which is the subject of such non-violent civil rights demonstrations within its jurisdiction;

**Compliance With Anti-discrimination laws** -- The grant will be conducted and administered in conformity with title VI of the Civil Rights Act of 1964 (42 USC 2000d), the Fair Housing Act (42 USC 3601-3619), and implementing regulations.

**Compliance with Laws** -- It will comply with applicable laws.

*James F. Abromaitis*  
Signature/Authorized Official

7-24-06  
Date

James F. Abromaitis

Name

Commissioner, CT. DECD

Title

505 Hudson Street

Address

Hartford, CT. 06106-7106

City/State/Zip

860-270-8009

Telephone Number

- This certification does not apply.  
 This certification is applicable. See signature on the last page.

### Specific HOME Certifications

The State certifies that:

**Tenant Based Rental Assistance** -- If it intends to provide tenant-based rental assistance:

The use of HOME funds for tenant-based rental assistance is an essential element of the State's consolidated plan.

**Eligible Activities and Costs** -- It is using and will use HOME funds for eligible activities and costs, as described in 24 CFR § 92.205 through §92.209 and that it is not using and will not use HOME funds for prohibited activities, as described in §92.214.

**Appropriate Financial Assistance** -- Before committing any funds to a project, the State or its recipients will evaluate the project in accordance with the guidelines that it adopts for this purpose and will not invest any more HOME funds in combination with other Federal assistance than is necessary to provide affordable housing;

*pr*   
Signature/Authorized Official

7-29-06  
Date

James F. Abromaitis

Name

Commissioner, CT. DECD

Title

505 Hudson Street

Address

Hartford, CT 06106-7106

City/State/Zip

860-270-8009

Telephone Number

This certification does not apply.  
 This certification is applicable. See signature on the last page.

**APPENDIX TO CERTIFICATIONS**

Instructions Concerning Lobbying and Drug-Free Workplace Requirements

**Lobbying Certification**

This certification is a material representation of fact upon which reliance was placed when this transaction was made or entered into. Submission of this certification is a prerequisite for making or entering into this transaction imposed by section 1352, title 31, U.S. Code. Any person who fails to file the required certification shall be subject to a civil penalty of not less than \$10,000 and not more than \$100,000 for each such failure.

**Drug-Free Workplace Certification**

1. By signing and/or submitting this application or grant agreement, the grantee is providing the certification.
2. The certification is a material representation of fact upon which reliance is placed when the agency awards the grant. If it is later determined that the grantee knowingly rendered a false certification, or otherwise violates the requirements of the Drug-Free Workplace Act, HUD, in addition to any other remedies available to the Federal Government, may take action authorized under the Drug-Free Workplace Act.
3. Workplaces under grants, for grantees other than individuals, need not be identified on the certification. If known, they may be identified in the grant application. If the grantee does not identify the workplaces at the time of application, or upon award, if there is no application, the grantee must keep the identity of the workplace(s) on file in its office and make the information available for Federal inspection. Failure to identify all known workplaces constitutes a violation of the grantee's drug-free workplace requirements.
4. Workplace identifications must include the actual address of buildings (or parts of buildings) or other sites where work under the grant takes place. Categorical descriptions may be used (e.g., all vehicles of a mass transit authority or State highway department while in operation, State employees in each local unemployment office, performers in concert halls or radio stations).
5. If the workplace identified to the agency changes during the performance of the grant, the grantee shall inform the agency of the change(s), if it previously identified the workplaces in question (see paragraph three).
6. The grantee may insert in the space provided below the site(s) for the performance of work done in connection with the specific grant: Place of Performance (Street address, city, county, state, zip code) Check if there are workplaces on file that are not identified here. The certification with regard to the drug-free workplace is required by 24 CFR part 21.

Place Name	Street	City	County	State	Zip
State of CT. DECD	505 Hudson ST.	Hartford		CT	06106

7. Definitions of terms in the Nonprocurement Suspension and Debarment common rule and Drug-Free Workplace common rule apply to this certification. Grantees' attention is called, in particular, to the following definitions from these rules: "Controlled substance" means a controlled substance in Schedules I through V of the Controlled Substances Act (21 U.S.C. 812) and as further defined by regulation (21 CFR 1308.11 through 1308.15); "Conviction" means a finding of guilt (including a plea of nolo contendere) or imposition of sentence, or both, by any judicial body charged with the responsibility to determine violations of the Federal or State criminal drug statutes; "Criminal drug statute" means a Federal or non-Federal criminal statute involving the manufacture, distribution, dispensing, use, or possession of any controlled substance; "Employee" means the employee of a grantee directly engaged in the performance of work under a grant,

Jurisdiction

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including:

- i. All "direct charge" employees;
- ii. all "indirect charge" employees unless their impact or involvement is insignificant to the performance of the grant; and
- iii. temporary personnel and consultants who are directly engaged in the performance of work under the grant and who are on the grantee's payroll. This definition does not include workers not on the payroll of the grantee (e.g., volunteers, even if used to meet a matching requirement; consultants or independent contractors not on the grantee's payroll; or employees of subrecipients or subcontractors in covered workplaces).

Note that by signing these certifications, certain documents must be completed, in use, and on file for verification. These documents include:

- 1. Analysis of Impediments to Fair Housing
- 2. Citizen Participation Plan
- 3. Anti-displacement and Relocation Plan

*James F. Abromaitis*  
Signature/Authorized Official

7-24-06  
Date

James F. Abromaitis  
Name  
Commissioner, CT. DECD  
Title  
505 Hudson Street  
Address  
Hartford, CT. 06106-7106  
City/State/Zip  
860-270-8009  
Telephone Number



**APPLICATION FOR FEDERAL ASSISTANCE**

Version 7/03

<b>1. TYPE OF SUBMISSION:</b> Application <input type="checkbox"/> Construction <input checked="" type="checkbox"/> Non-Construction		<b>2. DATE SUBMITTED</b>	Applicant Identifier
Pre-application <input type="checkbox"/> Construction <input type="checkbox"/> Non-Construction		<b>3. DATE RECEIVED BY STATE</b>	State Application Identifier
		<b>4. DATE RECEIVED BY FEDERAL AGENCY</b>	Federal Identifier

**5. APPLICANT INFORMATION**

Legal Name: CT. State Department of Social Services	<b>Organizational Unit:</b> Department: Community and Social Work Services
Organizational DUNS: 807854435	Division: Community Services Unit
<b>Address:</b> Street: 25 Sigourney Street	<b>Name and telephone number of person to be contacted on matters involving this application (give area code)</b> Prefix: Middle Name: First Name: Last Name: Marion K. Wojick
City: Hartford	Suffix:
County:	Email: marion.wojick@po.state.ct.us
State: Connecticut	Zip Code: 06106-2055
Country: USA	Phone Number (give area code): 860-424-5329
	Fax Number (give area code): 860-424-4957

**6. EMPLOYER IDENTIFICATION NUMBER (EIN):**  
06-6000798

**8. TYPE OF APPLICATION:**  
 New  Continuation  Revision  
If Revision, enter appropriate letter(s) in box(es)  
(See back of form for description of letters.)  
Other (specify)

**7. TYPE OF APPLICANT:** (See back of form for Application Types)  
A. State Agency  
Other (specify)

**10. CATALOG OF FEDERAL DOMESTIC ASSISTANCE NUMBER:**  
TITLE (Name of Program):  
Emergency Shelter Grants Program

**9. NAME OF FEDERAL AGENCY:**  
U.S. Department of Housing and Urban Development

**11. DESCRIPTIVE TITLE OF APPLICANT'S PROJECT:**  
Emergency Shelter Services

**12. AREAS AFFECTED BY PROJECT (Cities, Counties, States, etc.):**  
statewide, Connecticut

**13. PROPOSED PROJECT**  
Start Date: 7/1/06 Ending Date: 6/30/07

**14. CONGRESSIONAL DISTRICTS OF:**  
a. Applicant 1st,2nd,3rd,4th,5th  
b. Project 1st,2nd,3rd,4th,5th

<b>15. ESTIMATED FUNDING:</b>		<b>16. IS APPLICATION SUBJECT TO REVIEW BY STATE EXECUTIVE ORDER 12372 PROCESS?</b>	
a. Federal	\$ 1,134,627.00	a. Yes. <input type="checkbox"/>	THIS PREAPPLICATION/APPLICATION WAS MADE AVAILABLE TO THE STATE EXECUTIVE ORDER 12372 PROCESS FOR REVIEW ON DATE:
b. Applicant	\$ .00	b. No. <input type="checkbox"/>	PROGRAM IS NOT COVERED BY E. O. 12372
c. State	\$ .00	<input checked="" type="checkbox"/>	OR PROGRAM HAS NOT BEEN SELECTED BY STATE FOR REVIEW
d. Local	\$ .00	<b>17. IS THE APPLICANT DELINQUENT ON ANY FEDERAL DEBT?</b>	
e. Other	\$ .00	<input type="checkbox"/> Yes If "Yes" attach an explanation. <input checked="" type="checkbox"/> No	
f. Program Income	\$ .00		
g. TOTAL	\$ 1,134,627.00		

**18. TO THE BEST OF MY KNOWLEDGE AND BELIEF, ALL DATA IN THIS APPLICATION/PREAPPLICATION ARE TRUE AND CORRECT. THE DOCUMENT HAS BEEN DULY AUTHORIZED BY THE GOVERNING BODY OF THE APPLICANT AND THE APPLICANT WILL COMPLY WITH THE ATTACHED ASSURANCES IF THE ASSISTANCE IS AWARDED.**

**a. Authorized Representative**

Prefix	First Name Claudette	Middle Name J.
Last Name Beaulieu	Suffix	
b. Title Deputy Commissioner, CT State Department of Social Services	c. Telephone Number (give area code) 860-424-5004	
d. Signature of Authorized Representative	e. Date signed 8/2/06	



# CPMP State Grantee Certifications

Many elements of this document may be completed electronically, however a signature must be manually applied and the document must be submitted

in paper form to the Field Office.

- This certification does not apply.
- This certification is applicable. See signature on the last page.

## STATE CERTIFICATIONS

In accordance with the applicable statutes and the regulations governing the consolidated plan regulations, the jurisdiction certifies that:

**Affirmatively Further Fair Housing** -- The State will affirmatively further fair housing, which means it will conduct an analysis of impediments to fair housing choice within the state, take appropriate actions to overcome the effects of any impediments identified through that analysis, and maintain records reflecting that analysis and actions in this regard.

**Anti-displacement and Relocation Plan** -- It will comply with the acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended, and implementing regulations at 49 CFR 24; and it has in effect and is following a residential antidisplacement and relocation assistance plan required under section 104(d) of the Housing and Community Development Act of 1974, as amended, in connection with any activity assisted with funding under the CDBG or HOME programs.

**Drug Free Workplace** -- It will or will continue to provide a drug-free workplace by:

1. Publishing a statement notifying employees that the unlawful manufacture, distribution, dispensing, possession, or use of a controlled substance is prohibited in the grantee's workplace and specifying the actions that will be taken against employees for violation of such prohibition;
2. Establishing an ongoing drug-free awareness program to inform employees about --
  - a. The dangers of drug abuse in the workplace;
  - b. The grantee's policy of maintaining a drug-free workplace;
  - c. Any available drug counseling, rehabilitation, and employee assistance programs; and
  - d. The penalties that may be imposed upon employees for drug abuse violations occurring in the workplace;
3. Making it a requirement that each employee to be engaged in the performance of the grant be given a copy of the statement required by paragraph 1;
4. Notifying the employee in the statement required by paragraph 1 that, as a condition of employment under the grant, the employee will --
  - a. Abide by the terms of the statement; and
  - b. Notify the employer in writing of his or her conviction for a violation of a criminal drug statute occurring in the workplace no later than five calendar days after such conviction;
5. Notifying the agency in writing, within ten calendar days after receiving notice under subparagraph 4(b) from an employee or otherwise receiving actual notice of such conviction. Employers of convicted employees must provide notice, including position title, to every grant officer or other designee on whose grant activity the convicted employee was working, unless the Federal agency has designated a central point for the receipt of such notices. Notice shall include the identification number(s) of each affected grant;
6. Taking one of the following actions, within 30 calendar days of receiving notice under subparagraph 4(b), with respect to any employee who is so convicted --
  - a. Taking appropriate personnel action against such an employee, up to and including termination, consistent with the requirements of the Rehabilitation Act of 1973, as amended; or
  - b. Requiring such employee to participate satisfactorily in a drug abuse assistance or rehabilitation program approved for such purposes by a Federal, State, or local health, law enforcement, or other appropriate agency;
7. Making a good faith effort to continue to maintain a drug-free workplace through implementation of paragraphs 1, 2, 3, 4, 5 and 6.

**Anti-Lobbying** -- To the best of the state's knowledge and belief:

1. No Federal appropriated funds have been paid or will be paid, by or on behalf of it, to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with the awarding of any Federal contract, the making of any Federal grant, the making of any Federal loan, the entering into of any cooperative agreement, and the extension, continuation, renewal, amendment, or modification of any Federal contract, grant, loan, or cooperative agreement;
2. If any funds other than Federal appropriated funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this Federal contract, grant, loan, or cooperative agreement, it will complete and submit Standard Form-LLL, "Disclosure Form to Report Lobbying," in accordance with its instructions; and
3. It will require that the language of paragraph 1 and 2 of this anti-lobbying certification be included in the award documents for all subawards at all tiers (including subcontracts, subgrants, and contracts under grants, loans, and cooperative agreements) and that all subrecipients shall certify and disclose accordingly.

**Authority of State** -- The submission of the consolidated plan is authorized under State law and the State possesses the legal authority to carry out the programs under the consolidated plan for which it is seeking funding, in accordance with applicable HUD regulations.

**Consistency with plan** -- The housing activities to be undertaken with CDBG, HOME, ESG, and HOPWA funds are consistent with the strategic plan.

**Section 3** -- It will comply with section 3 of the Housing and Urban Development Act of 1968, and implementing regulations at 24 CFR Part 135.

  
\_\_\_\_\_  
Signature/Authorized Official

Date

Name

Title

Address

City/State/Zip

Telephone Number



- This certification does not apply.  
 This certification is applicable. See signature on the last page.

### HOPWA Certifications

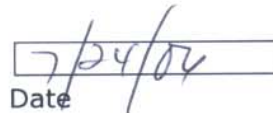
The State HOPWA grantee certifies that:

**Activities** -- Activities funded under the program will meet urgent needs that are not being met by available public and private sources.

**Building** -- Any building or structure assisted under the program shall be operated for the purpose specified in the plan:

1. For at least 10 years in the case of any building or structure purchased, leased, rehabilitated, renovated, or converted with HOPWA assistance,
2. For at least 3 years in the case of assistance involving non-substantial rehabilitation or repair of a building or structure.

  
Signature/Authorized Official

  
Date

Claudette J. Beaulieu

Name

Deputy Commissioner, CT. DSS

Title

25 Sigourney Street

Address

Hartford, CT. 06106-2055

City/State/Zip

860-424-5004

Telephone Number

- |                                     |  |
|-------------------------------------|--|
| <input type="checkbox"/>            | <b>This certification does not apply.</b>                                |
| <input checked="" type="checkbox"/> | <b>This certification is applicable. See signature on the last page.</b> |

### ESG Certifications

The Emergency Shelter Grantee certifies that:

1. The requirements of 24 *CFR* 576.21(a)(4) which provide that the funding of homeless prevention activities for families that have received eviction notices or notices of termination of utility services meet the following standards: (A) that the inability of the family to make the required payments must be the result of a sudden reduction in income; (B) that the assistance must be necessary to avoid eviction of the family or termination of the services to the family; (C) that there must be a reasonable prospect that the family will be able to resume payments within a reasonable period of time; and (D) that the assistance must not supplant funding for preexisting homeless prevention activities from any other source.
2. The requirements of 24 *CFR* 576.25(b)(2) concerning the submission by nonprofit organizations applying for funding of a certification of approval of the proposed project(s) from the unit of local government in which the proposed project is located.
3. The requirements of 24 *CFR* 576.53 concerning the continued use of buildings for which Emergency Shelter Grant funds are used for rehabilitation or conversion of buildings for use as emergency shelters for the homeless; or when funds are used solely for operating costs or essential services, concerning the population to be served.
4. The building standards requirement of 24 *CFR* 576.55.
5. The requirements of 24 *CFR* 576.56, concerning assistance to the homeless.
6. The requirements of 24 *CFR* 576.57, other appropriate provisions of 24 *CFR* Part 576, and other applicable Federal law concerning nondiscrimination and equal opportunity.
7. The requirements of 24 *CFR* 576.59(b) concerning the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970.
8. The requirements of 24 *CFR* 576.59 concerning minimizing the displacement of persons as a result of a project assisted with these funds.
9. (9) The requirements of 24 *CFR* 576.56(a) and 576.65(b) that grantees develop and implement procedures to ensure the confidentiality of records pertaining to any individual provided family violence prevention or treatment services under any project assisted under the Emergency Shelter Grants Program and that the address or location of any family violence shelter project assisted with ESG funds will not be made public, except with written authorization of the person or persons responsible for the operation of the shelter.
10. The requirement of that recipients involve, to the maximum extent practicable, homeless individuals and families in constructing, renovating, maintaining, and operating facilities assisted under the ESG program, and in providing services for occupants of these facilities as provided by 24 *CFR* 576.56(b)(2).
11. The new requirement of the McKinney Act (42 *USC* 11362) to develop and implement, to the maximum extent practicable and where appropriate, policies and protocols for the discharge of persons from publicly funded institutions or systems of care (such as health care facilities, foster care or other youth facilities, or correction programs and institutions) in order to prevent such discharge from immediately resulting in homelessness for such persons. I further understand that State and local governments are primarily responsible for the care of these individuals, and that ESG funds are not to be used to assist such persons in place of State and local resources.

I certify that the State will comply with the requirements of 24 *CFR* Part 24 concerning the Drug Free Workplace Act

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Jurisdiction

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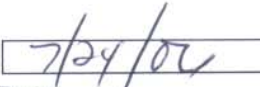
of 1988.

I certify that the State will comply with the provisions of, and regulations and procedures applicable under 24 CFR 576.57(e) with respect to the environmental review responsibilities under the National Environmental Policy Act of 1969 and related authorities as specified in 24 CFR Part 58 as applicable to activities of nonprofit organizations funded directly by the State. The State also agrees to assume the Department's responsibility and authority as set forth in 24 CFR 576.57(e) for acting on the environmental certifications and requests for the release of funds submitted to the State by local government recipients.

I certify that the State will ensure the provision of the matching funds required by 24 CFR 576.51 and 42 USC 11375, including a description of the sources and amounts of such supplemental funds, as provided by the State, units of general local government or nonprofit organizations.

I further certify that the submission of a complete and approved Consolidated Plan with its relevant certifications, which is treated as the application for an Emergency Shelter Grant, is authorized under State law, and that the State possesses legal authority to fund the carrying out of grant activities by units of general local government and nonprofit organizations in accordance with applicable laws and regulations of the Department of Housing and Urban Development.

  
Signature/Authorized Official

  
Date

Claudette J. Beaulieu

Name

Deputy Commissioner, CT. DSS

Title

25 Sigourney Street

Address

Hartford, CT. 06106-2005

City/State/Zip

860-424-5004

Telephone Number

- This certification does not apply.  
 This certification is applicable. See signature on the last page.

**APPENDIX TO CERTIFICATIONS**

Instructions Concerning Lobbying and Drug-Free Workplace Requirements

**Lobbying Certification**

This certification is a material representation of fact upon which reliance was placed when this transaction was made or entered into. Submission of this certification is a prerequisite for making or entering into this transaction imposed by section 1352, title 31, U.S. Code. Any person who fails to file the required certification shall be subject to a civil penalty of not less than \$10,000 and not more than \$100,000 for each such failure.

**Drug-Free Workplace Certification**

1. By signing and/or submitting this application or grant agreement, the grantee is providing the certification.
2. The certification is a material representation of fact upon which reliance is placed when the agency awards the grant. If it is later determined that the grantee knowingly rendered a false certification, or otherwise violates the requirements of the Drug-Free Workplace Act, HUD, in addition to any other remedies available to the Federal Government, may take action authorized under the Drug-Free Workplace Act.
3. Workplaces under grants, for grantees other than individuals, need not be identified on the certification. If known, they may be identified in the grant application. If the grantee does not identify the workplaces at the time of application, or upon award, if there is no application, the grantee must keep the identity of the workplace(s) on file in its office and make the information available for Federal inspection. Failure to identify all known workplaces constitutes a violation of the grantee's drug-free workplace requirements.
4. Workplace identifications must include the actual address of buildings (or parts of buildings) or other sites where work under the grant takes place. Categorical descriptions may be used (e.g., all vehicles of a mass transit authority or State highway department while in operation, State employees in each local unemployment office, performers in concert halls or radio stations).
5. If the workplace identified to the agency changes during the performance of the grant, the grantee shall inform the agency of the change(s), if it previously identified the workplaces in question (see paragraph three).
6. The grantee may insert in the space provided below the site(s) for the performance of work done in connection with the specific grant: Place of Performance (Street address, city, county, state, zip code) Check if there are workplaces on file that are not identified here. The certification with regard to the drug-free workplace is required by 24 CFR part 21.

Place Name	Street	City	County	State	Zip
State of CT. DSS central office and regional offices	25 Siquourney St.	Hartford	central office	CT	06106

7. Definitions of terms in the Nonprocurement Suspension and Debarment common rule and Drug-Free Workplace common rule apply to this certification. Grantees' attention is called, in particular, to the following definitions from these rules: "Controlled substance" means a controlled substance in Schedules I through V of the Controlled Substances Act (21 U.S.C. 812) and as further defined by regulation (21 CFR 1308.11 through 1308.15); "Conviction" means a finding of guilt (including a plea of nolo contendere) or imposition of sentence, or both, by any judicial body charged with the responsibility to determine violations of the Federal or State criminal drug statutes; "Criminal drug statute" means a Federal or non-Federal criminal statute

Jurisdiction

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involving the manufacture, distribution, dispensing, use, or possession of any controlled substance;  
"Employee" means the employee of a grantee directly engaged in the performance of work under a grant,  
including:

- i. All "direct charge" employees;
- ii. all "indirect charge" employees unless their impact or involvement is insignificant to the performance of the grant; and
- iii. temporary personnel and consultants who are directly engaged in the performance of work under the grant and who are on the grantee's payroll. This definition does not include workers not on the payroll of the grantee (e.g., volunteers, even if used to meet a matching requirement; consultants or independent contractors not on the grantee's payroll; or employees of subrecipients or subcontractors in covered workplaces).

Note that by signing these certifications, certain documents must be completed, in use, and on file for verification. These documents include:

- 1. Analysis of Impediments to Fair Housing
- 2. Citizen Participation Plan
- 3. Anti-displacement and Relocation Plan

  
\_\_\_\_\_  
Signature/Authorized Official

  
\_\_\_\_\_  
Date

Claudette J. Beaulieu

Name

Deputy Commissioner, CT. DSS

Title

25 Sigourney Street

Address

Hartford, CT. 06106-2055

City/State/Zip

860-424-5004

Telephone Number