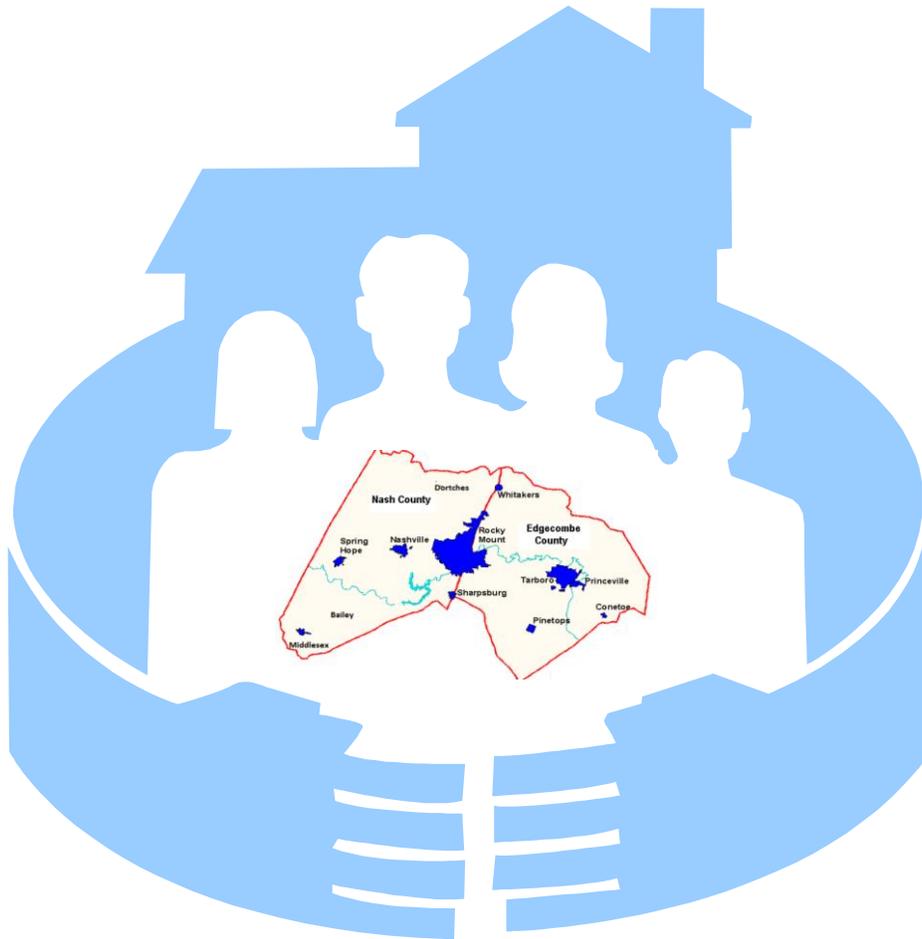


The City of Rocky Mount & The Down East HOME Consortium

FY 2016-2017 Annual Action Plan



Working Together To Build Strong Communities

The City of Rocky Mount and the Down East HOME Consortium:
FY 2016-2017 One-Year Action Plan

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Introduction/Member Jurisdictions

In late 1996, ten local communities in Nash and Edgecombe Counties in eastern North Carolina, formed the Down East HOME Consortium (DEHC). With the City of Rocky Mount, already a Community Development Block Grant (CDBG) Entitlement City, as the Lead Entity, the Consortium began receiving Home Investment Partnership Program funds (HOME) in 1997.

Currently, the following jurisdictions comprise the DEHC:

Edgecombe County	Nash County
Bailey	Princeville
Conetoe	Rocky Mount
Middlesex	Sharpsburg
Nashville	Spring Hope
Pinetops	Tarboro
Dortches	Whitakers

Edgecombe and Nash Counties' membership in the DEHC does not include the governments of the municipalities in both Counties who chose not to join the Consortium.

CDBG assistance will be directed to the qualified low- and moderate income areas in the City of Rocky Mount, while HOME funds will be allocated to the participating members of the Consortium in percentages relative to the population of each within the Consortium.

Rocky Mount, the lead entity in the DEHC, is the largest member jurisdiction of the Consortium with a 2010 Census population of 57,477. Rocky Mount, Sharpsburg, and Whitakers are each situated in two-county jurisdictions, referred to as the "Twin County" area. The Town of Sharpsburg is a *tri-county* jurisdiction, sharing its jurisdiction with Wilson County as well as Edgecombe and Nash counties. Census data indicate that the total population of the DEHC is 152,392.

The Consolidated Plan

The 2012-2016 DEHC Consolidated Plan is the comprehensive planning tool that identifies each member jurisdiction's housing and supportive service needs, individually and collectively, and outlines strategies and programs for addressing those needs over a five-year time frame. For each program year included in the Consolidated Plan, the City and the DEHC must develop and submit an Annual Action Plan to HUD. This document is the DEHC's **2016-2017 Annual Action Plan**. By providing opportunities for citizens and local groups to participate in the planning process, the Consolidated Plan and the Annual Action Plan promote a comprehensive

approach to local programming and facilitates the emergence of *effective* community development strategies.

The Consolidated Plan and each subsequent Annual Action Plan are further intended to place emphasis on broad participation of local citizens, and a variety of “Community Partner” agencies, that are to help create a unified vision of community development needs. The City of Rocky Mount and the Down East HOME Consortium actively seek to make their programs more efficient and effective in addressing the housing and community development problems faced by its low and moderate income residents. During the planning stages and citizen participation phases of the Annual Action Plan, several public meetings were conducted in order to maximize public input and solicit the concerns of citizens and related service agencies. A copy of the Citizen Participation Plan is included as Appendix A. All citizens and agencies who provided input during public comment period had their comments considered for incorporation into the FY 2015-2016 Action Plan. However, with very limited CDBG and HOME resources, relative to total need, it is unfortunate that all of the needs cannot be addressed within any single year’s budget and/or with only the federal resources provided. The DEHC is committed to working collectively to pursue all resources available to address the needs in the five-year plan.

CITIZEN PARTICIPATION (91.220(b))

The Consolidated Plan and each subsequent Annual Action Plan place emphasis on broad participation of local citizens, and a variety of “Community Partner” agencies, that are to help create a unified vision of community development needs. The City of Rocky Mount and the Down East HOME Consortium actively seek to make their programs more efficient and effective in addressing the housing and community development problems faced by its low- and moderate-income population.

The City and Consortium complied with the citizen participation requirements of the regulations by doing the following:

- following a Citizen Participation Plan;
- publishing informational notices about the plan prior to public hearings on the plan using the Rocky Mount Telegram as the primary source; notices and advertisements are also placed on TV 19, the local television station, on the Rocky Mount City Calendar on the City Webpage, and in County public buildings;
- holding public meetings in accessible places at convenient times after providing reasonable notice;
- publishing a summary of the Annual Action Plan, describing its contents and purpose and a listing of locations where the entire plan could be examined;
- making the Consolidated Plan and Annual Action Plan available for public examination and comment on the City Website and at locations in the City for a period of thirty (30) days before submission to HUD;
- providing citizens, public agencies, and other interested parties reasonable access to records regarding any uses of any assistance for affordable and supportive housing that the City may have received during the preceding five years;

- considering the views and comments of citizens, and preparing a summary of those views for consideration with the Consolidated Plan submission; and
- Providing notice in English and in Spanish per the adopted Language Access Plan

The City's complete Citizen Participation Plan is included in Appendix A and the Language Assistance Plan is included in Appendix B.

The first public hearing for interested parties was held on April 13, 2016, following a published public notice. The meeting was held in the Nash County Municipal Building in Nashville, and was open to the public. There were two attendees.

The second public hearing was held on April 18, 2016 at Edgecombe County Municipal Building in Tarboro. There were twelve attendees.

The third public hearing was held on April 22, 2016 in the Council Chambers of the City of Rocky Mount. There were no attendees.

On April 29, 2016, the updated document was made available to the public for review at the Department of Planning and Development office at 331 South Franklin Street. The document was also available on the City Website.

On May 2, 2016, the draft annual Action Plan was emailed to all participating jurisdictions of the DEHC and current CHDOs. No comments were received.

On May 3, 2016, the Final Annual Action Plan and Resolution of Authorization were placed on the City Council meeting agenda for May 9, 2016. This advertised meeting, held in the City Council Chamber as part of a regularly scheduled City Council meeting, reviewed the elements of the plan, and presented the proposed strategies in detail. The floor was opened for comments and questions. All questions were responded to at these meetings. Council authorized the Mayor to execute the necessary certifications and staff to submit the plan to HUD.

The document was approved for submission at this meeting and the Mayor was authorized to sign it. On May 13, 2016, the City of Rocky Mount and the DEHC forwarded the document to the Greensboro Area Office of the Department of Housing and Urban Development.

**FY 2015-2016 Resources
(91.220(c) (1) & (2))**

HOME and CDBG

The primary resources available to address the needs presented in this Annual Action Plan are derived from HOME, Community Development Block Grant (CDBG) funds, North Carolina Housing Finance Agency, and program income. The Entitlement CDBG and program income resources are applicable to Rocky Mount only. The City of Rocky Mount expects to receive \$503,720 in Entitlement CDBG funds and \$429,295 in HOME funds in Fiscal Year 2016-2017.

In addition to federal CDBG allocations, State CDBG funds are disbursed on a competitive basis to non-entitlement communities. Historically, the Towns of Middlesex, Nashville, Spring Hope, Bailey, Sharpsburg, Tarboro and Whitakers, and Nash and Edgecombe Counties have received CDBG Community Revitalization (Concentrated Needs) and Scattered Site Housing funds from the North Carolina Division of Community Assistance to assist with some of their local housing and community development needs. At the time of publication of this document, State CDBG funds were not available for housing rehabilitation, which significantly impacts small municipalities' ability to address critical housing needs.

When the Consortium was established, the member jurisdictions, with Rocky Mount as the lead entity, agreed upon an allocation formula based on the "percent of total Consortium population" for each member. Subsequently, the DEHC agreed to disburse funds on a County basis, excluding Rocky Mount. This agreement was implemented during FY 2006-2007, and will continue with this Action Plan. The DEHC Consortium Agreement was renewed for another three (3) year term in FY 2013-2014.

Currently, the DEHC has a match balance sufficient to meet the match requirement. There is no match requirement for FY 2015-2016. The chart below provides a summary of anticipated HOME resources for the Consortium in FY 2015-2016.

Anticipated HOME Funds: Consortium - 2015-2016

Total Allocation	\$ 429,295
Minus 10% Home Admin	\$ 42,930
Balance	\$ 386,365
Match Base	\$ 386,365
Minus 15% CHDO Activity	\$ 64,394
Home PJ Funds	\$ 321,971
*Required Match	\$ -
HOME Activities	\$ 321,971

Based on the allocation formula the funds for each jurisdiction are as follows:

PJ	% Multiplier	Home Allocation	Match	Total Funds
Edgecombe County	16.33%		\$0.00	\$ 48,756
Nash County	27.04%		\$0.00	\$ 80,773
Bailey	0.47%		\$0.00	\$ 1,403
Conetoe	0.26%		\$0.00	\$ 776

Dortches	0.57%		\$0.00	\$ 1,702
Middlesex	0.59%		\$0.00	\$ 1,762
Nashville	3.02%		\$0.00	\$ 9,017
Pinetops	0.99%		\$0.00	\$ 2,956
Princeville	0.66%		\$0.00	\$ 1,970
Rocky Mount	39.14%		\$0.00	\$116,860
Sharpsburg	1.70%		\$0.00	\$ 5,076
Spring Hope	0.86%		\$0.00	\$ 2,568
Tarboro	7.80%		\$0.00	\$ 23,288
Whitakers	0.57%		\$0.00	\$ 1,922.99
TOTAL	100.00%			\$298,470
Nash County jurisdictions have a total of	34.82%		\$103,962	
Edgecombe County jurisdictions have a total of	26.04%		\$ 77,748	
Rocky Mount	39.14%		\$116,860	
		Total	\$298,570	

Although DEHC agreed initially upon the above allocation formula based on the “percent of total Consortium population” for each member, in Fiscal Year 2006-2007 the Consortium agreed to disburse funds on a County basis, excluding Rocky Mount. This agreement continues with this Action Plan.

Anticipated CDBG Funds: - 2016-2017

Total Allocation	\$ 503,720
Minus 15% Public Service	\$ 75,558
Balance	\$ 428,162
Minus 20% CDBG Admin	\$ 100,744
Balance	\$ 327,418
Minus Section 108 Loan	\$ 109,000
Programmable CDBG Funds	\$ 218,418

Minus Urgent Repairs	\$ 50,000
Minus Training Programs	\$ 40,000
Rehab Delivery	\$ 50,000
Section 3 Outreach	\$ 3,000
Anticipated CDBG Balance	\$ 75,418

Additional Resources

At the time of this publication, the City of Rocky Mount has not been awarded any non-HUD funds for housing or community development activities.

**GEOGRAPHIC DISTRIBUTION
(91.220(D) & (E))**

The City of Rocky Mount will target CDBG funding to neighborhood revitalization activities in order to maximize outcomes and meet performance measures. The majority of funds will be used for urgent repair and blight abatement to support revitalization of historic districts and center-city neighborhoods. These allocations serve the low- and moderate-income areas of the City and provide multiple benefits with respect to maintaining neighborhoods, providing affordable housing, and creating economic opportunity.

Other activities discussed previously continue to be implemented on a scattered site basis, as these projects serve to keep low- and moderate-income families and individuals in their homes, thus addressing issues of affordability and sustainability.

Within the rest of the Consortium, rehab project activities will occur in Edgecombe County on a scattered site basis. This effort keeps low- and moderate-income, often elderly, families and individuals in their homes.

DEHC will continue to support rehabilitation of LMI owner-occupied homes within the DEHC service area, as indicated in the five (5) year consolidated plan.

**ANNUAL OBJECTIVES & ACTIVITY DESCRIPTIONS
(91.220(C)(3),(D),(E),(G))**

The Down East HOME Consortium and the City of Rocky Mount will continue to implement the five-year Consolidated Plan by addressing housing, community development and other related problems, using and leveraging all the available resources. This section presents the priority projects anticipated to be undertaken to address needs related to housing, homelessness, employment training, economic development for the City of Rocky Mount, and housing/HOME-related activities for the rest of the Consortium. The proposed activities are summarized below and reflect the information presented in the CPMP Project Descriptions and Project Summaries.

HOUSING ACTIVITIES: The CDBG and HOME projects to be undertaken in Rocky Mount will consist of housing and non-housing activities. The housing rehabilitation activities will take

place in either concentrated, or “targeted”, neighborhood areas, and on a scattered site basis. Details of activities summarized in the budget table are presented below:

Scattered Site Housing Rehabilitation and Substantial Housing Rehab/Housing

Replacement: In an effort to assist low income homeowners to make the repairs necessary to bring their homes up to minimum housing code and HUD quality standards through a grant to low/moderate income owners in Nash & Edgecombe Counties. Edgecombe County continues to have difficulty finding properties to meet the HOME rehab guidelines due to the age and deterioration of the housing stock. This year Edgecombe County will provide new home construction for rehab applicants whose homes are beyond repair. Homeowners will provide their own relocation as a match to the program. **Estimated 5 units (HOME: \$200,000 carryover)**

Beal Street Redevelopment: The current housing stock in the Happy Hill neighborhood is old and in many cases functionally obsolete. Through property acquisition, demolition and multi-family housing, the City will focus on the redevelopment of this neighborhood which is a gateway into downtown. The City has sold approximately 6 acres to a developer to develop eight (80) affordable rental units as a part of a multi-phased, mixed-use development. Construction began in May 2016. **Estimated 80 units. (HOME \$450,000 carryover)**

Objective Category: Decent Housing

Outcome Category: Availability

Historic Districts Matching Grant Pilot Program: To stabilize existing homes in Rocky Mount’s seven historic districts, the City will make low interest, forgivable loans to home owners and home purchasers at 100% of median income and below to make necessary systems upgrades to homes, including plumbing, heating and air, electrical upgrades and roof replacements. **Approximately 40 units (General Funds \$400,000, HOME \$100,000 carryover)**

Objective Category: Decent Housing

Outcome Category: Sustainability

Development at Genesis Estates: The City will provide HOME funds to Rocky Mount/Edgecombe Community Development Corporation (RMECDC) to construct two affordable homes in the Genesis Estates subdivision. RMECDC will use proceeds from the sale of these homes to further develop additional affordable homes for purchase in the subdivision. Development of Genesis Estates will provide low-moderate income home buyers in the area with a modern, single-family option. **Approximately 5 units (HOME \$264,462.00 carryover with reinvestment of sales income).**

Objective Category: Decent Housing

Outcome Category: Affordability

Holly Street Phase III: The City will provide HOME funds to Rocky Mount/Edgecombe Community Development Corporation (RMECDC) to construct two additional affordable duplexes in Holly Street neighborhood. The Holly Street Duplexes that have been completed

thus far have maintained high- occupancy, have improved the appearance of the neighborhood, and have provided residents with excellent rental units. **4 units (HOME \$322,937 carryover).**

Objective Category: Decent Housing

Outcome Category: Affordability

Urgent Repair: The City will utilize CDBG funds to provide urgently needed repairs for low and very low income owner occupants within the city limits of Rocky Mount. These repairs are those deemed necessary to protect the life and safety of the occupant. **Approximately 6 units (CDBG \$50,000).**

Objective Category Chart

Objective Category	Description	Activity	Source of Funds
Decent Housing	Retaining the affordable housing stock	DEHC HOME Rehabilitation	HOME funds
Suitable Living Environment	Eliminating blighting influences and the deterioration of property and facilities	Urgent Repair & Scattered Site Rehabs	NCHFA Urgent Repair
Decent Housing	Increasing the availability of affordable permanent housing in standard condition to low-income and moderate-income families, particularly to members of disadvantaged minority groups, without discrimination on the basis of race, color, religion, sex, national origin	Beal Street Redevelopment Holly Street Phase III Duplexes Genesis Estates – Single Family Homes	CDBG/ City HOME funds
Economic Opportunities	The provision of jobs to low-income persons living in areas affected by those programs and activities under programs covered by the plan	Business Center Section 3 Outreach Construction Trade Training Program	CDBG/HOME
Economic Opportunities	Establishment, stabilization and expansion of small businesses (including micro-businesses)	Business Center	CDBG

Economic Opportunities	Job creation and retention	Section 3 Outreach Construction Trade Training Program Business Center	CDBG/HOME/NCHFA
Economic Opportunities	Availability of mortgage financing for low income persons at reasonable rates using non-discriminatory lending practices	Housing Counseling	CDBG

NON-HOUSING ACTIVITIES:

Public Services and Economic Development: Annually the City of Rocky Mount provides public services funding to provide funding to non-profits. The City of Rocky Mount has a total of \$75,558.00 available for Public Services funds. The City will award \$75,558.00 in public services funding to qualified nonprofits and community-based organizations who are on a biannual, competitive basis. Grants will be approved and recipients notified by June 30, 2016. For the FY 2016-2017 program year, Public Service activity priorities are:

- Small Business Development
- Housing Counseling
- Foreclosure Mitigation
- Youth Development
- Job Training
- Homelessness Prevention

Construction Training and Section 3 Outreach: The City will continue to support the carpentry component of a highway construction training program jointly sponsored by the North Carolina Department of Transportation and Rocky Mount OIC. Participants will learn construction skills, life skills, and receive supportive services aimed at securing and maintaining employment. Continued funding will be based upon satisfactory reporting, compliance, and achievement of agreed upon outcomes.

The City will support at least two training sessions or information meetings for current and prospective contractors to inform them of Section 3 requirements and opportunities, MWBE contracting goals, and other resources available to small and historically underutilized businesses.

Program Administration: The City will utilize both CDBG and HOME funds to provide staff administrative oversight and compliance activities for the City’s CDBG program (as an Entitlement City) and HOME programs for the City and the Consortium (as the Lead Entity of

the DEHC). **Funds will partially support five (5) staff positions. (CDBG Admin Funds: \$100,744.00 /HOME Admin Funds: \$42,930.00)**

Rehab Delivery Costs: The City will continue to provide file processing, structural assessments, work write-ups, cost estimates, intermediate and final inspections for the City programs as well the HOME program rehabs of the Consortium. The City currently provides rehab delivery services for the Urgent Repair, and HOME Homeowner Rehab programs. **Approximately 22 units (CDBG \$50,000).**

Public Housing and Resident Initiatives (91.220(h))

The Rocky Mount Housing Authority has an affiliated a non-profit called Southeastern North Carolina Community Development Corporation (SENCCDC). The City of Rocky Mount and SENCCDC are partners in the redevelopment of Beal Street. The City has donated property to SENCCDC for the redevelopment of that property in which supportive housing will be built by SENCCDC to serve very low to moderate income persons.

The City will continue to work with the RMHA on initiatives to support homeownership among very low- to moderate-income households.

The Rocky Mount Housing Authority is not considered a “troubled” agency by HUD; indeed, the Rocky Mount Housing Authority is a “high performing agency.”

Homelessness and Special Needs (91.220(i))

The homeless population in the Down East HOME Consortium area has increased in number and become a diverse group of people with very specialized needs. With the recent economic downturn and the rising unemployment, the twin county area has seen an increase in the number of foreclosures and the need for foreclosure counseling to prevent homelessness. Although there are several continuum of care providers for the homeless in the area, the Consortium recognizes the need to expand services in this area and will do so in FY 2016-2017 through creation of affordable housing and provision of counseling services.

Within the resources available, the City attempts to prevent homelessness, address the special needs population, assist the homeless, and eliminate chronic homelessness, through increasing the availability of affordable housing and providing financial support to United Community Ministries (UCM). Given the extent of need and the limited resources available, the City and DEHC allocates resources to meet these homeless and special needs through the following programs:

- Scattered Site Housing Rehabilitation and Substantial Housing Rehab/Housing Replacement
- Ensuring rehabbed and newly constructed properties are brought up to Energy Star standards.

- Beal Street Redevelopment focused on property acquisition and demolition in the targeted Happy Hill community. The dilapidated housing will be replaced with newly constructed single and multifamily housing, approximately 80 units.
- Harambee Square Apartment Renovations, providing modern affordable and handicapped accessible to the senior citizen community in Rocky Mount.

BARRIERS TO AFFORDABLE HOUSING (91.220(j))

The most important impediment revolves around the lack of Federal and State resources for affordable housing initiatives. The lack of programs and resources to reduce excessive rent or mortgage burdens to qualified persons is a key factor.

Other key factors affecting the availability of affordable housing include the following:

- the high cost of newly constructed housing created by rising land, infrastructure, and construction costs,
- the high cost of home repairs and maintenance, especially for persons with low or fixed incomes,
- difficulty in obtaining financing for the development of new housing,
- difficulty in obtaining financing for home mortgages,
- a lack of incentives for developers to include affordable housing in their proposed developments.

The City has been implementing focused community development/revitalization in an effort to provide affordable housing and at the same time maintain good neighborhoods, stop the deterioration of border-line neighborhoods and turnaround deteriorating neighborhoods. These projects include the Beal Street Redevelopment, Genesis Estates, Holly Street Revitalization, and the Clairmont Apartment projects, which will continue in the coming year.

In Edgecombe County, DEHC will continue to utilize HOME funds to replace dilapidated housing units to help prevent homelessness for families who own their homes but cannot afford extensive repairs. This will also help to improve the housing stock in Edgecombe County and maintain households in affordable housing. No new Nash County HOME rehabs are anticipated in FY 2016.

Fair Housing and Impediments

In 2012 the City of Rocky Mount and DEHC completed the required Analysis to Impediments to Fair Housing Choice (Appendix C). As a result of this study, the following impediments were identified:

- 1) Need for increased awareness, outreach and education
- 2) Limited supply of affordable housing
- 3) Improved government policies
- 4) Awareness of potential discrimination

The City of Rocky Mount and DEHC will implement the following activities during FY 2015-2016 to address housing discrimination:

- Continue to conduct or financially support Fair Housing events.
- Continue to see reliable Spanish translation services.
- Provide mailings to tenants in Rocky Mount, and realtors from the North Carolina Legal Aid on renter's rights.
- Place an annual ad in the Rocky Mount Telegram and other regional general circulation newspapers for Fair Housing Month.
- Continue to distribute public service announcements on Channel 19 and with other radio outlets on fair housing issues and education.

Section 3 Outreach and Minority Women-Owned Business Enterprises (MWBE) Outreach

In 2012 the City of Rocky Mount/DEHC was placed under a voluntary compliance agreement (Appendix C) with the U.S Department of Housing and Urban Development for compliance with Section 3. In 2013, the City of Rocky Mount entered into a memorandum of understanding with the Southeastern North Carolina Community Development Corporation in partnership with the on-going efforts of the Section 3 program.

As part of the voluntary compliance agreement, the City of Rocky Mount/DEHC will continue to do the following as it relates to outreach of Section 3 residents and business concerns:

1. Continue to have a designated Section 3 Coordinator within the Community Development Division.
2. Continue to provide outreach to Section 3 contractors through venues such as placing specific ads for Section 3 contractors in the newspaper, and networking with minority firms.
3. Where appropriate and financially feasible, create smaller contracts from larger general contracts to subcontract opportunities to qualified Section 3 firms.
4. Continue to qualify residents and contractors and maintain an active database within the Community Development Division.
5. Continue to aim for the goal of having at least 10% of contracts within the Community Development Division to go to qualified Section 3 firms.

The City of Rocky Mount Community Development Division recognizes MWBE through a self-certification process. The Community Development Division will continue to offer outreach for MWBE contractors.

In FY 2015, the City sponsored a half-day business workshop on avoiding and resolving IRS tax issues. Targeted attendees were current, past, and potential housing contractors, as well as businesses that contract with other City departments.

PROGRAM SPECIFIC REQUIREMENTS CDBG (91.220(1)(1))

1. The City has year-to-date CDBG program income of \$9,683.54
2. In the preceding year, the City had CDBG program income of \$11,758.23.
3. The City has Section 108 loans, which it is the process of repaying.
4. There are no urban renewal settlement funds.
5. There are no grant funds returned to the line of credit.
6. There is no income from float-funded activities.
7. The City has no urgent need activities.
8. The City will use \$933,015 (CDBG and HOME) to fund activities that benefit low- and moderate-income persons.

PROGRAM SPECIFIC REQUIREMENTS

HOME

(91.220(I)(1))

1. Neither the City nor DEHC uses funds for homebuyers.
2. Neither the City nor DEHC uses HOME funds to refinance existing debt secured by multifamily housing.
3. DEHC has developed a complete set of Recapture Provisions, which are found in Appendix L.
4. Neither the City nor DEHC provide tenant-based rental assistance.
5. Neither jurisdiction intends to use any form of investment other than those described in 24 CFR 92.205(b).
6. Neither the City nor DEHC plans to market housing containing more than five HOME-assisted units.
7. Both the City and DEHC strive to ensure the inclusion of minority and woman-owned firms involved in all aspects of real estate, the law, and construction.
8. Neither the City nor DEHC intends to use HOME funds to refinance existing debt secured by multifamily housing that has been rehabilitated with HOME funds.
9. Neither the City nor DEHC will receive American Dream Down Payment Initiative funds.

Monitoring

The City of Rocky Mount and the Department of Planning and Development are responsible for monitoring both CDBG and HOME program activities. The Department has developed procedures to ensure that approved projects will meet the purpose of the Consolidated Plan and that available funds will be distributed in a timely manner. Monitoring will include programs operated directly by the City, Consortium members who are using HOME funds, and those carried out by any sub-recipients. The City's Compliance Administrator and HOME Coordinator will be responsible for carrying out the monitoring provisions for the HOME activities of the Consortium. The Sub-recipient Agreement is the contractual document between the City and the sub-recipient, which specifies the activities that are to be completed and the conditions, which must be met, including compliance with the applicable laws and regulations. This agreement is the basis for monitoring all sub-recipients.

Specific monitoring provisions will include:

- 1) Sub-recipients will be required to submit quarterly reports on their programs and activities. These reports will include relevant information such as the number of units completed and/or persons served; the amount of funds expended or obligated; number of cases processed; factors which adversely affect or hinder performance.
- 2) The City will require written verification on the work accomplished with all requests for funds from sub-recipient or contractors, prior to release of payment.
- 3) The Community Development staff will prepare periodic progress reports for review by the Planning Director, the Redevelopment Commission, the City Manager and the City Council.

The Community Development staff will be responsible for monitoring all HOME and CDBG programs and/or HOME/CDBG-assisted projects, whether they are administered by Consortium members, CHDO's or Sub-recipients. Each will be monitored on-site at least annually.

The monitoring visit will consist of a review of documents necessary to determine:

- Program compliance;
- Compliance with any applicable written agreements;
- Compliance with any related regulations including, but not limited to Davis-Bacon, Fair Housing, Section 3, Minority Business Outreach, and Comprehensive Planning;
- Progress of HOME-assisted projects in relation to time line established in written agreements;
- For CHDO's, records relating to CHDO status;
- For HOME-assisted rental units, compliance with rental and occupancy restrictions; and
- Income eligibility.

The Consortium member, CHDO or Sub-recipient will be given written notice at least two weeks prior to the monitoring visit. This notice will include the date of the visit, as well as its purpose, and a list those items that are to be reviewed. Each monitoring visit will begin with an entrance conference to ensure that there is a clear understanding of the purpose and scope of the visit. Once documents and information have been gathered and reviewed, an analysis will be made and preliminary findings presented in an exit conference. This visit will then be followed by a formal, written notification as to the results of the monitoring review. This review is to indicate both problem areas and successes. The notification will also serve as a written record of the review. Any necessary corrective measures will be prescribed and closely monitored in future visits.

Appendix A. Citizen Participation Plan

Appendix B. Language Access Plan

Appendix C. Public Hearing Notices

Appendix D. Certifications