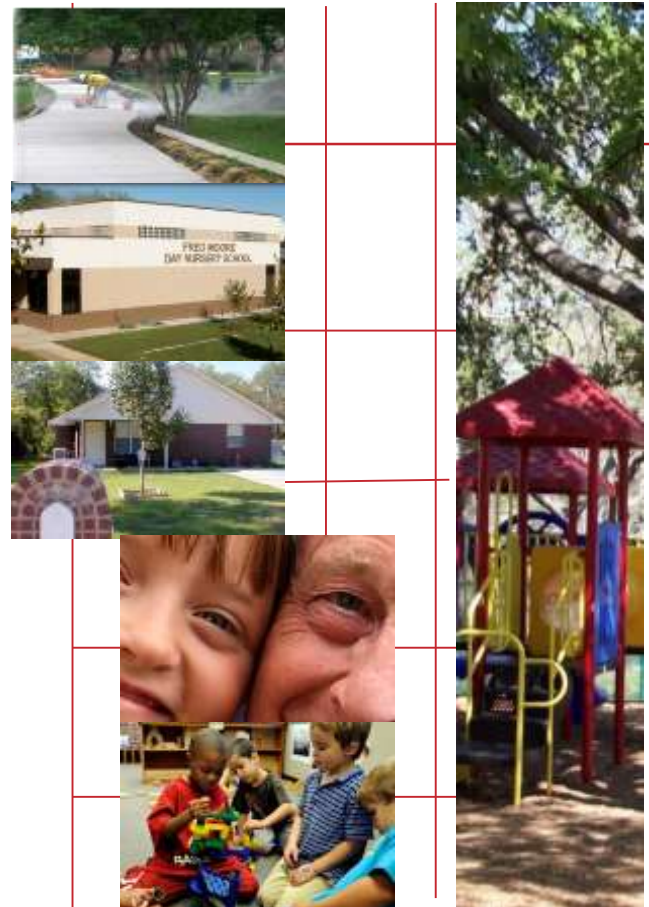


DRAFT

City of Denton
Community Development Division



**2018/19 Action Plan
4th year of the 2015/19 Consolidated Plan
(August 1, 2018 through July 31, 2019)**



... for housing and community development

CITY COUNCIL APPROVAL:

Funding Presentation on May 22, 2018

Proposed Approval on June 5, 2018

Executive Summary

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

1. Introduction

This document serves as the City of Denton's 2018 Action Plan for the Community Development Block Grant (CDBG) and HOME Investment Partnerships Program (HOME). In accordance with 24 CFR Part 91.220 of Title I of the Housing and Community Development Act of 1974, as amended, the City of Denton is required to submit a One-Year Action Plan to the U.S. Department of Housing and Urban Development. The plan outlines the specific projects and services that will be funded during the 2018 program year to address Denton's strategies stated in the 2015-2019 Consolidated Plan for Housing and Community Development.

The City of Denton is currently an entitlement city for the Community Development Block Grant (CDBG) and a participating jurisdiction for the HOME Investment Partnership (HOME) Programs. SF-424 applications for CDBG and HOME are available as in the appendix section. The City of Denton's estimated total federal and program income funding for 2018 is \$1,480,238 (includes \$146,950 of Reprogrammed Funds).

A total of 84.9% of all CDBG and HOME funds has been allocated to low and moderate income activities. This is due to funds allocated to administration.

2. Summarize the objectives and outcomes identified in the Plan

Below are the objectives and outcomes identified in the City of Denton's 2015-2019 Consolidated Plan for Housing and Community Development:

1. Decent Housing

- Encourage homeownership by providing down payment and closing assistance to 30 low and moderate income households.
- Maintain 235 existing affordable housing units for low and moderate income households including reconstruction, substantial rehabilitation and minor repairs for single-family housing units.
- Encourage and maintain 55 affordable rental units including rehabilitation of substandard units and rehabilitation of multi-family units.

2. Suitable Living Environment

- Provision of public facility and infrastructure improvements to benefit 10,000 people.

- Provision of public services such as health and mental care, affordable day care, after school programs, senior services, transitional housing, programs for victims of domestic violence, disabled services, and advocacy services to benefit 2800 people.
- Provision of homeless assistance activities for 6500 homeless persons especially extremely low income or those with no income, persons with physical and mental disabilities including temporary shelter, food and clothing to chronically homeless and those that have recently become homeless.

3. Evaluation of past performance

This is an evaluation of past performance that helped lead the grantee to choose its goals or projects.

The City's activities to meet the goals in the 2015-2019 Consolidated Plan are reported annually in the Consolidated Annual Performance and Evaluation Report (CAPER). Below is information on the number of households or persons served through the CDBG and HOME grants from the 2016-17 CAPER. The public services assistance numbers reflect the total number of persons served by the agencies receiving CDBG and General Fund support.

The 2016 program year was the 2nd year of Denton 2015-19 Consolidated Plan. Staff focused on housing, public services activities with an emphasis on homeless assistance and public facility improvements. Below is a discussion of program year accomplishments related to the goals in the 2016 Action Plan:

Affordable Rental Units: Completed the 2015 Fair Oaks Senior Housing Project that included the construction of sidewalks ramps and assisted 42 senior residents. The city is on track to meet its 5-year goal with a completion rate of 76% at the end of Year 2.

Homeless Assistance and Prevention: 2016 funding was provided to the Denton County Friends of the Family and Salvation Army. The agencies provided assistance to 4965 people during the program year. The city is on track to meet its 5-year goal with a completion rate of 81.05% at the end of Year 2.

Homeownership Assistance/Education: 2016 and residual CDBG/HOME funds were available during the 2016 PY to assist 4 households with homeownership assistance and minor repairs. While the city fell short of its Year 2 goal, it is on track to meet the 5-year goal 2 with a completion rate of 40% at the end of Year 2. A review of the HAP program determined that the lack of affordable housing for sale in good condition and a seller's market affected the number of households assisted in the program year.

Housing Rehabilitation: During the 2016 PY the city assisted 35 homeowners with rehabilitation assistance. The goal for Home Improvement Program was 7 households, but only 6 households were assisted. The city fell short of its Year 2 goal. A review of the program determined that one project was delayed at the request of the homeowner due to health issues. This project began during the 2017

PY. The 2016 PY goal for Minor Repair Program was 40 households and 29 households were assisted. The city fell short of its Year 2 goal. A review of the Minor Repair Program determined that 8 applications were denied due to income above 65% of AMI or bids above \$5,000. The city is not on track to meet its 5-year goal in housing rehabilitation with a completion rate of 30% after Year 2.

Public Facilities and Infrastructure Improvements: 2016 CDBG Funding was available to meet this goal of 9,685. The Fred Moore Park Project and the Londonderry Playground Replacement Projects were completed except for the reimbursement of funding to the Parks and Recreation Department. These two projects will be completed during the 2017 program year. The table shows that the city did not meet its Year 2 goal with a completion rate of 2.8% at the end of Year 2. Two projects, the Fred Moore Park Project and the Londonderry Playground Replacement Project, were completed except for the final drawdown of funds which occurred after the end of the reporting period. The accomplishments of benefitting 5000 people with those activities will be in next year's CAPER thus increasing the completion rate for this goal. The City of Denton is also working on completing the Carl Young Park and Quakertown Restrooms in the next year to meet the 5-year goal with an additional 6910 people benefitting.

Public Services: Denton City Council Day School, Summer Camp and SPAN, Inc. provided assistance to 520 people. While the city fell short of its Year 2 goal, it is on track to meet the 5-year goals with a completion rate of 43% at the end of Year 2.

4. Summary of Citizen Participation Process and consultation process

Summary from citizen participation section of plan.

To ensure citizen participation in the 2018/19 Action Plan process including the substantial amendment to the 2016 and 2017 Action Plans, the city followed its Citizen Participation Plan at all stages of the plan and amendments.

Public hearings were held November 13, 2017 and November 16, 2017. Spanish translations were provided at the public hearings. The public hearings updated citizens on the status of current programs and activities and asked the citizens how they felt the 2018 funds should be spent. The public hearings were held within low and moderate-income neighborhoods. Information on the public hearings was included in the Community Development Quarterly Newsletter. The Community Development Quarterly Newsletter was mailed or e-mailed to neighborhood associations; recreation centers and libraries; service agencies and beneficiaries; city council, Human Services Advisory Committee (HSAC) and Community Development Advisory Committee (CDAC) members; churches; applicants; contractors; participating lenders and realtors; employees; citizens who attended previous public hearings; and interested citizens. The newsletter which is in Spanish and English is available for pickup or viewing at all recreation centers, libraries, and the City of Denton's website. A notice was also placed in the Denton Record-Chronicle.

After the Action Plan was drafted, advertisements were placed in the Denton Record-Chronicle summarizing the plan and announcing to the public where the Action Plan would be available for review, and the process for submitting comments to the City of Denton. The draft Action Plan was available at the Community Development Department and on the City of Denton's web page. The advertisements also included information on the upcoming public hearing. All comments received from the public were addressed before submitting the plan to the U.S. Department of Housing and Urban Development.

To ensure citizen participation at all stages of the 2018 Action Plan process, a public hearing was scheduled on May 22, 2018 during a City Council Meeting to give citizens the opportunity to comment on the 2018/19 proposed projects and activities.

5. Summary of public comments

Below is a list of comments received at the public hearings on November 14, 2017 and November 16, 2017:

1. Denia Recreation Center 11/14/2017

Two residents, William Jenkins and Claudette Fette were present. Jane Piper-Lunt, a member of the Community Development Advisory Committee was also present. Those present discussed the need for affordable and accessible housing. It was noted that there are not enough affordable units to house those in the Section 8 program. Staff and those present discussed the Denton Housing Authority's partnerships with developers on proposed Housing Tax Credit projects. The Veranda, currently under construction, was noted as a tax credit project that would provide affordable housing for Section 8 households.

Ms. Fette stated that services in the Denton community need to be expanded. She stated the City needed to continue support for the Community Health Clinic and possibly fund some other services such as a student run clinic and peer to peer counseling. It was noted that having a variety of services in one place would be very helpful for those in need. Ms. Fette also provided additional information regarding the stated needs. Mr. Jenkins added his support for services including mental health services. Ms. Piper-Lunt stated that there is a need for tent communities for the homeless. She noted that these could be emergency and/or transitional housing as these individuals and families work towards acquiring permanent housing.

2. MLK Jr. Recreation Center 11/16/2017

The following individuals were in attendance: Tom Newell, Tyheshia Scott, Margaret Dawson, Jerry Dawson, William Jenkins, Atlaly Rangel, and Amilar Rangel. Barbara Ross and Luisa Garcia, CD staff introduced themselves.

Tom Newell explained the need for a larger Community Food Distribution Center and the possibility of using a part of the new Serve Denton facility. He added that there may be a request for funding to install a garage door, new shelving and other improvements for the facility.

Those present stated that affordable housing was a need in the community. Rent assistance should be available to assist low and moderate-income households. It was noted that rental assistance would support homeless prevention.

Staff reviewed the housing programs currently carried out by Community Development staff – Housing rehabilitation and reconstruction, Homeownership Assistance, Minor Repair. Ms. Rangel stated that the HOPWA (Housing Opportunity for Persons with AIDS) should be funded to assist those in need.

Below is a list of comments received during the 30-day comment period for the 2018 Action Plan:

- This section will be updated at the end of the comment period.

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

Public comments were reviewed with the Community Development Advisory Committee and considered in the development of the 2018 Action Plan. Public comments were also forwarded to City departments.

7. Summary

The Action Plan was developed by requesting public input regarding the use of federal funds. Funding applications were available in November and December 2017. Application training was provided by Community Development Staff on both community development and human services applications. The Community Development Advisory Committee and the Human Services Advisory Committee reviewed applications and held funding hearings in February and March 2018. Each committee developed a set of funding recommendations. The 2018 Action Plan was developed based on the CDAC and HSAC recommendations.

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

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

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

Agency Role	Name	Department/Agency
CDBG Administrator	DENTON	Community Development Division
HOME Administrator	DENTON	Community Development Division

Table 1 – Responsible Agencies

Narrative (optional)

The Community Development Division is the lead agency responsible for overseeing the development of the Consolidated Plan for the City of Denton. The Community Development Division also administers the Community Development Block Grant (CDBG) and the HOME Investment Partnerships (HOME) Grant.

Consolidated Plan Public Contact Information

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

1. Introduction

The City of Denton utilizes a variety of methods to encourage on-going participation from residents, social service providers, and community development organizations. The participation process for the Consolidated Plan included public hearings, public comment period; a community survey for citizens and non-profit agencies, participating in coalitions and committees, consultation with various city departments; and consultation with housing providers.

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

The City of Denton's Community Development Division coordinates the citizen consultation process for the five-year Consolidated Plan and each annual Action Plan. The Citizen Participation Plan (CPP), as approved by City Council, sets forth the City's policies and procedures for citizen input and participation in the grant process. After approval, copies of the Consolidated Plan and the Action Plan are published and made available at three to four city locations and the City's website. At least two of these locations are located in low to moderate-income neighborhoods. The CPP also describes the process affording citizens and organizations the opportunity to provide the City with information on housing and community development needs, as part of the preparation of the Consolidated Plan and Action Plans. Additionally, the City conducts at least two public hearings during the development process before the Consolidated Plan and the Action Plan are published. An additional public hearing takes place during the 30-day comment period in order to obtain citizen's views and to respond to comments and questions. This final public hearing is held in conjunction with a scheduled City Council meeting. The City also sends notifications to various State agencies, local neighborhood groups, city departments, and service organizations as part of the consultation process.

The City of Denton has a very strong network of service providers including those providing housing, education, health care and other needed services. Over the past four years, the United Way of Denton County, the City of Denton, the Denton Independent School District and other organizations have joined together to review and discuss the provision of services in the Denton area in an attempt to maximize the benefits derived from available resources.

Below is a list of the committees that have been developed to assist in improving the coordination of services:

- Denton County Homeless Coalition
- Homeless Leadership Team, collective impact project
- Behavioral Health Leadership Team, a collective impact project

- Community Health Council
- Denton Hunger Coalition
- Early Childhood Coalition serving the North Texas Region
- United Way's Community Needs Assessment Committee

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

The City of Denton in Denton County is a part of the Texas Balance State Continuum of Care (CoC) operated by the Texas Homeless Network (THN). In collaboration with our local homeless coalition, the Denton County Homeless Coalition (DCHC), the CoC sets priorities for housing and supportive services to address the needs of homeless persons (particularly chronically homeless individuals and families, families with children, veterans, and unaccompanied youth) and persons at risk of homelessness.

As an active participant in the DCHC and CoC, the City of Denton is working in collaboration and in support of these priorities. City of Denton Staff now serves on the board of Texas Balance of State Continuum of Care (CoC).

Coordination with the CoC offers expanded access to funding, quality collaborative tools, and greater knowledge resources. Collaboration includes improved data collection and better management of available resources by improving the Homeless Management Information System (HMIS) collections and increasing the number of contributors to HMIS locally. CoC collaboration improves the relevance of data collected through the annual Point-in-Time (PIT) homeless count. Lastly, CoC collaboration has led to the implementation of a Coordinated Entry System (CE) as a part of a larger, developing community housing crisis response system.

In addition to local federal CoC funds, Emergency Solutions Grant (ESG) are used locally to provide persons experiencing homelessness with housing and supportive services for housing stability. The City of Denton, as lead agency in the Denton County ESG partnership collaborative, works to ensure funds for supportive housing programs are in alignment with CoC priorities and that the programs address the needs so persons experiencing homelessness can transition out of homelessness into housing and those at-risk of homelessness are prevented from becoming homeless.

CoC and local data are vital to the effort to identify and address those housing needs. Based on our community data from HMIS analysis, CE, and the annual PIT Count, those experiencing homelessness in Denton County include sheltered and unsheltered homeless; chronically homeless both in shelter and those living in places not fit for human habitation who are in need of housing services; families and individuals who are fleeing domestic violence or at risk of homelessness due to imminent danger; and low-income, at-risk Individuals and families at imminent risk of eviction who otherwise would be

homeless without assistance. Our prioritized populations are veterans, chronically homeless, victims of domestic violence, and persons experiencing mental health crisis who are homeless.

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

This section is not applicable since Denton does not receive ESG funds from HUD as an annual entitlement.

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

Table 2 – Agencies, groups, organizations who participated

1	Agency/Group/Organization	Behavioral Health Leadership
	Agency/Group/Organization Type	Collective Impact Initiative
	What section of the Plan was addressed by Consultation?	Health Needs
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	The Denton County Behavioral Health Leadership Team is a Collective Impact Initiative envisioning Comprehensive behavioral health for every person in Denton County. The initiative facilitates the data-driven development and delivery of a coordinated continuum of behavioral health services with the help of more than 30 influential leaders of local organizations affecting the treatment of behavioral health in Denton County.
2	Agency/Group/Organization	Community Health Council
	Agency/Group/Organization Type	Local Health Council
	What section of the Plan was addressed by Consultation?	Health Needs
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	The Community Health Council is a coalition of community committed to improving the health and well-being of the people who live and work in the community. Projects include a community health needs assessment in order to better understand the health status and needs of the community and use the knowledge gained to implement programs that will benefit the community.
3	Agency/Group/Organization	Denton Hunger Coalition
	Agency/Group/Organization Type	Local Coalition
	What section of the Plan was addressed by Consultation?	Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth

	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	To coordinate hunger relief efforts in Denton County and surrounding area by facilitating programs that address the issue of hunger.
4	Agency/Group/Organization	Early Childhood Coalition serving the North Texas Region
	Agency/Group/Organization Type	Local Coalition
	What section of the Plan was addressed by Consultation?	Public Services Needs
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Coalition of stakeholders formed to engage and empower parents, families, professionals, and communities to provide enriched environments for all children birth to 8 years through: Advocacy; Resources; and Comprehensive Services
5	Agency/Group/Organization	Community Needs Assessment Committee
	Agency/Group/Organization Type	Local Committee
	What section of the Plan was addressed by Consultation?	Public Services Needs
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	The 2017 Community Needs Assessment will serve a critical role in helping many local nonprofits, school districts, government entities, and others bring resources to Denton County and serve our neighbors who are most in need.
6	Agency/Group/Organization	Denton County Homeless Coalition
	Agency/Group/Organization Type	Local Homeless Coalition
	What section of the Plan was addressed by Consultation?	Homelessness Strategy

	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Public private partnership between the City of Denton and the United Way of Denton County to fund a coordinator position to oversee a collective impact project that will develop and implement community-wide coordinated strategies toward the shared goal of ending homelessness.
7	Agency/Group/Organization	Homeless Leadership Team
	Agency/Group/Organization Type	Collective Impact Initiative
	What section of the Plan was addressed by Consultation?	Homelessness Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	The Denton County Homeless Leadership Team is a Collective Impact Initiative envisioning strategies to end homelessness in Denton County. The initiative will facilitate the data-driven development and delivery of a coordinated continuum of homelessness and prevention of homelessness services with the help of influential leaders of local organizations affecting the delivery of homeless and housing services in Denton County.

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

The City made every effort to consult all Agency types.

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

Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
Continuum of Care	Denton County Homeless Coalition	Ensuring greater coordination of supportive wrap-around services and resources with local housing programs to expand the community's capacity to prevent and end episodes of homelessness.
2030 DentonPlan	City of Denton Development Services Department	Tracking support and compliance with the 2030 Denton Plan will also support CD progress on housing and services goals included in the 2015-2019 Consolidated Plan.

Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
2017 United Way Community Assets/Needs Assessment	United Way of Denton County	Greatest needs as stated in the UW assessment mirror many of those in the ConPlan. Support from the large number of participants that developed the UW assessment will assist in meeting the stated goals.

Table 3 – Other local / regional / federal planning efforts

AP-12 Participation – 91.105, 91.200(c)

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

The City of Denton utilizes a variety of methods to encourage on-going participation from residents, social service providers, and community development organizations. The participation process for the Consolidated Plan included public hearings, public comment period; a community survey for citizens and non-profit agencies, participating in coalitions and committees, consultation with various city departments; and consultation with housing providers. In order to broaden the citizen participation process, residents were able to access a brief survey regarding the use of CDBG, HOME and other funding targeted to assist low and moderate-income individuals and households on the City's website 45 surveys were completed by citizens. A summary of survey results are located in the appendix. The opportunity for residents to provide comments and ideas without attending a public hearing, gave staff additional information on existing programs and what can be done to improve services. This input will be used, if necessary, to improve existing programs and, if funding is available, develop new programs to meet needs described in the surveys and other citizen participation activities.

Citizen Participation Outreach

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
1	Public Meetings	<p>Minorities</p> <p>Non-English Speaking - Specify other language: Spanish</p> <p>Persons with disabilities</p> <p>Residents of the City of Denton including low and moderate income</p>	10 attended meeting	<p>Need for affordable housing, rent assistance, larger Community Food Distribution Center</p> <p>Support for Community Health Clinic, mental health services, tent communities for homeless, and HOPWA funding.</p>	All comments were considered.	<p>Public Hearing Date - November 13, 2017 and November 16, 2017</p>

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
2	Newspaper Ad	<p>Minorities</p> <p>Non-English Speaking - Specify other language: Spanish</p> <p>Persons with disabilities</p> <p>Residents of the City of Denton including low and moderate income</p>	N/A	No comments received	N/A	Advertised in the Denton Record Chronicle for all three public hearings: 11/13/17, 11/16/17 and 5/22/18
3	Public Hearing Survey	Survey link was e-mailed to newsletter database	45 surveys completed on-line	See appendix for summary of survey results	All comments were considered.	N/A

Table 4 – Citizen Participation Outreach

Expected Resources

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

Introduction

The City of Denton is an Entitlement City for the CDBG grant and a Participating Jurisdiction for the HOME grant from the U.S. Department of Housing and Urban Development. The following table shows the amount of federal funds expected to be available to the City of Denton in year four of the 2015-2019 Consolidated Plan and the expected amounts for the subsequent year.

Anticipated Resources

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
CDBG	public - federal	Admin and Planning Housing Public Improvements Public Services	899,772	8,000	0	907,772	880,779	Denton expects a 3 percent reduction over the remaining year.
HOME	public - federal	Homeowner rehab Multifamily rental rehab	349,516	76,000	146,950	572,466	415,030	Denton expects a 3 percent reduction over the remaining year.

Table 5 - Expected Resources – Priority Table

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

The CDBG and HOME activities leverage other funding sources to carry out various activities. For the 2018/19 program year, CDBG and HOME projects will leverage an additional \$11,938,997 in federal, state, local and private fund and include the following:

Proposed General Funds for human services activities \$322,500
Proposed General Funds for administration \$348,360
Federal Funds for human services activities \$1,555,858
State Funds for human services activities \$1,859,267
Local Funds for human services activities \$2,697,602
Local Funds for public improvement activities \$226,388
Private Funds for human services activities \$4,928,122
Private Funds for housing programs \$900
Amount Leveraged \$11,938,997

The above list includes proposed General Funds from the City of Denton. General fund recommendations will be considered during the normal budgeting cycle and considered for approval in September 2018.

The HOME program requires a participating jurisdiction to provide a 25% match of the federal HOME funds. The City of Denton's local match for the HOME program is \$78,641.10 for the 2018/19 program year. The match of federal HOME grant excludes administrative allowances of 10% and program income. The City of Denton will provide the match from a variety of sources including the following: Residual balance of Match from 2017/18 program year; FHLB funds provided to Denton Affordable Housing Corporation for eligible HOME projects; Denton County Housing Finance Corporation and Texas Department of Housing and Community Affairs funds provided to Denton Affordable Housing Corporation for eligible HOME projects.

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

Not applicable.

Discussion

Not applicable.

Annual Goals and Objectives

AP-20 Annual Goals and Objectives

Goals Summary Information

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	Public Services	2015	2019	Non-Homeless Special Needs Non-Housing Community Development		Provision of Public Services	CDBG: \$82,500 HOME: \$0	Public service activities other than Low/Moderate Income Housing Benefit: 596 Persons Assisted
2	Housing Rehabilitation	2015	2019	Affordable Housing		Affordable Housing	CDBG: \$75,000 HOME: \$355,082	Homeowner Housing Rehabilitated: 18 Household Housing Units
3	Affordable Rental Units	2015	2019	Affordable Housing		Affordable Housing	HOME: \$174,833	Rental units rehabilitated: 46 Household Housing Units
4	Homeless Assistance & Prevention	2015	2019	Homeless		End Homeless Prevention	CDBG: \$50,000	Homeless Person Overnight Shelter: 2537 Persons Assisted
5	Public Facilities and Infrastructure Improvements	2015	2019	Non-Housing Community Development		Public Facilities and Infrastructure Improvements	CDBG: \$516,253	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 13,404 Persons Assisted

Table 6 – Goals Summary

Goal Descriptions

1	Goal Name	Public Services
	Goal Description	Provision of public services to benefits low and moderate income persons. CDBG and General funds will be used to support the provision of services by local non-profit agencies. Services will include, but not limited to health and mental health care, affordable day care, after school programs, senior services, disabled services, and advocacy services.
2	Goal Name	Housing Rehabilitation
	Goal Description	Maintain existing affordable housing units in Denton for low and moderate income households. Funding will be used for reconstruction, substantial rehabilitation and minor repairs for single-family housing units including compliance with the lead-based paint regulations.
3	Goal Name	Affordable Rental Units
	Goal Description	Encourage and maintain standard affordable rental units that are offered to extremely low, low and moderate income renter households. Funding will be used rehabilitate affordable rental units and make public improvements
4	Goal Name	Homeless Assistance & Prevention
	Goal Description	Provision of services to meet the needs of homeless persons, especially extremely low income or those with no income, persons with physical and mental disabilities. Funding will be used for temporary shelter, provision of food and clothing to chronically homeless and those that have recently become homeless. Funding will also be used for health services and job counseling to support the homeless in obtaining housing and having sufficient income to maintain housing.
5	Goal Name	Public Facilities and Infrastructure Improvements
	Goal Description	Provides funding for public facility and infrastructure improvements. Public facility projects benefits low and moderate income persons at public services facilities. Infrastructure improvement projects benefits low and moderate income neighborhoods including: street improvements; installation of new sidewalk, water and sewer lines, and drainage improvements; improving and expanding park and recreational facilities.

Projects

AP-35 Projects – 91.220(d)

Introduction

The City of Denton is currently a Community Development Block Grant (CDBG) entitlement and a participating jurisdiction for the HOME Investment Partnership (HOME) Programs. SF-424 applications for CDBG and HOME are available in the appendix section. The City of Denton's estimated total federal funds and program income funding for 2018/19 is \$1,480,238 and includes \$146,950 in reprogrammed funds from prior year funds. Besides the federal funds, the City of Denton is also leveraging an additional \$11,938,997 in local funds from the City of Denton General Funds. Please note that the table below shows the federal funding available from the U.S. Department of HUD for the 2018/19 program year. Below is the list of projects that are recommended to be funded with General Funds for the 2018/19 fiscal year:

Child Care Services

- Denton Christian Preschool - \$26,000 to provide quality early childhood education for at-risk children in the community.
- Fred Moore Day Nursery, Inc. - \$40,000 to provide nurturing and developmentally appropriate early learning environment for low-income families between the ages of 6 weeks and 5 years old.

Emergency Assistance for Homeless or At Risk Housing Assistance

- Giving HOPE, Inc. - \$26,500 for financial rental assistance to families who are homeless and seeking to secure permanent housing.
- Interfaith Ministries - \$7,000 for short term rental assistance to prevent eviction and prevent homelessness.
- Monsignor King Homeless Center - \$32,000 for the provision of emergency shelter during inclement weather for people experience homelessness.
- Our Daily Bread - \$15,000 for the Senior Program Coordinator to manage all programs related to social services, referrals provided to client and maintain the Homeless Information Management System database.

Family Resources

- Communities in Schools of North Texas, Inc. - \$22,000 for personnel and supplies for dropout prevention programs in Denton ISD campuses located within city limits of Denton.

- CASA of Denton County, Inc. - \$20,000 to provide advocacy services in the judicial system for abused children who have been removed from their home. The agency helps to ensure the child is placed in a safe, permanent home.
- Youth and Family Counseling - \$10,000 for counseling services for adolescents referred by area police, courts and schools.

Food Security Services

- Special Programs for Aging Needs (SPAN), Inc. - \$4,500 for home delivered and congregate meals for senior adults in Denton. An additional \$20,500 was recommended with CDBG funds.

Health Care and Mental Health Services

- Denton Community Health Clinic - \$32,000 for health care and case management for patients with complex needs in coordination of care and specialized eye exams for persons with diabetes.
- Denton County MHMR - \$15,000 for LOSS Team coordinator for suicide prevention program.
- Health Services of North Texas - \$45,000 for indigent primary care providing immunizations, treatment for acute & chronic physical and behavioral health conditions, well visits, care management and access to specialty care.
- PediPlace - \$5,000 for medical salaries, and medical care service delivery costs to residents of Denton

Other Types of Public Services

- RSVP Serving Denton County RSVP (VISTA) - \$13,000 for providing paid full-time volunteer support to organizations that help eradicate poverty.
- RSVP Serving Denton County (Volunteers) - \$5,000 for coordination of volunteer activities for senior citizens in Denton who provide volunteer services to local nonprofits.

General fund recommendations will be considered during the normal budgeting cycle and consider for approval in September 2018.

A total of 83.63% of all CDBG and HOME funds have been allocated to low and moderate income activities not including administration.

Projects

#	Project Name
1	Community Development Administration
2	DAHC Rental Rehab Program
3	Denton City County Day Care Facility Improvements
4	Denton City County Day School
5	Denton Co. Friends of the Family
6	Fairoaks Senior Housing Project
7	Home Improvement Program
8	Kids Summer Camp
9	McKinney Sidewalk Project
10	Minor Repair Program
11	MLK Playground Replacement Project
12	Salvation Army of Denton
13	Special Programs for Aging Needs
14	Thomas St., Water & Sewer Project
15	Wayne St. Water & Sewer Project
16	Unprogrammed Funds

Table 7 - Project Information

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

The City of Denton's CDBG and HOME allocations have not been sufficient to allow for the funding of extensive housing, economic development or public works projects. Geographic standards do not apply to city-wide programs such as Minor Repair, Home Improvement Program, and public services programs. The amount of funds available, and continued reductions for the past years has limited the use of funds. Public facility and public improvement projects have been completed in residential areas meeting HUD's low to moderate-income standards.

Minor Repair and Home Improvement are based on a first-come, first-served basis and there are no specific geographic areas. However, the Home Improvement program does have specific guidelines regarding the age of the housing. Regardless of the area income, housing units that were built 20 years ago or less, are not eligible for housing rehabilitation and units that were built 15 years ago or less are not eligible for the minor repairs. These requirements support the use of funds in older neighborhoods.

All investments in public facilities and/or public improvements are based on requests received from residents of the low to moderate-income block groups and other areas of the city. After a request has been made, City staff will assess the need for the improvement and the project cost. The City staff evaluation will determine which requests are in a "high" needs category, are

an appropriate use of CDBG funds, and are projects with costs that can be covered under the CDBG allocation.

Denton Affordable Housing Corporation (DAHC), the only certified Community Housing Development Organization (CHDO) currently serving Denton, generally purchases rental units and homebuyer units in low to moderate income areas due to the cost of units in higher income areas. However, in some instances, housing units that have been foreclosed upon in higher income areas may also be purchased. DAHC units are renovated and sold or rented to eligible households.

The primary obstacle to addressing underserved needs remains a lack of adequate federal funding. The following are actions planned to address obstacles to meeting underserved needs:

- Seek out additional funding sources to support housing and public services activities;
- Assist local non-profit organizations in obtaining grants or other funding to support their efforts;
- If necessary, act as a “pass through” organization to continue use of State and other funding to support homeless prevention and services for the homeless;
- Continue to support existing public (social) services programs through the allocation and administration of City of Denton general fund dollars.
- Work with the City’s Development Services Department to implement recommendations included in the Denton Plan 2030.

AP-38 Project Summary
Project Summary Information

1	Project Name	Community Development Administration
	Target Area	Not applicable
	Goals Supported	Not applicable
	Needs Addressed	601 E. Hickory, Suite B, Denton Texas
	Funding	CDBG: \$181,554
		HOME: \$42,551
	Description	Program administration for the CDBG and HOME grants and includes program management, coordination, and monitoring associated with carrying out eligible activities.
	Target Date	7/31/2019
	Estimate the number and type of families that will benefit from the proposed activities	Not applicable
	Location Description	Not applicable
2	Planned Activities	Funds will be used to cover the cost of planning, administering, operating and monitoring the CDBG and HOME programs.
	Project Name	DAHC Rental Rehab Program
	Target Area	Not applicable
	Goals Supported	Affordable Rental Units
	Needs Addressed	Affordable Housing
	Funding	HOME: \$66,833
	Description	Rehabilitation of rental units owned by the Denton Affordable Housing Corp, a certified CHDO. DAHC's rental units are rented to low and moderate income renters.
	Target Date	7/31/2019
	Estimate the number and type of families that will benefit from the proposed activities	5 units
	Location Description	Units located in the City limits of Denton
3	Planned Activities	Rehabilitate 5 rental units that are rented to low and moderate income households.
	Project Name	Denton City County Day Care Facility Improvements
	Target Area	Not applicable
	Goals Supported	Public Facilities and Infrastructure Improvements
	Needs Addressed	Public Facilities and Infrastructure Needs
	Funding	CDBG: \$56,960
	Description	The project will include upgrades to the Day School playground and painting exterior of the Day School building and the exterior/interior of the gym building. The daycare serves low to moderate-income families.
	Target Date	9/30/2019

	Estimate the number and type of families that will benefit from the proposed activities	150 low and moderate income persons
	Location Description	Denton City County Day School; 1603 Paisley St; Denton TX 76209
	Planned Activities	Funds will be used on renovation costs.
4	Project Name	Denton City County Day School
	Target Area	Not applicable
	Goals Supported	Public Services
	Needs Addressed	Provision of Public Services
	Funding	CDBG: \$37,000
	Description	Denton City County Day School is a nonprofit preschool program serving children ages 2 to 5 years on a sliding scale tuition. DCCDS provides full day preschool education for kindergarten readiness. Students receive 2 meals and afternoon snack. Curriculum theme based subjects include math/science, art/music, circle time/fine arts, early literacy and physical education.
	Target Date	9/30/2019
	Estimate the number and type of families that will benefit from the proposed activities	150 low and moderate income persons
5	Location Description	Denton City County Day School; 1603 Paisley St; Denton TX 76209
	Planned Activities	Funds will be used for Salaries for two preschool teachers.
	Project Name	Denton Co. Friends of the Family
	Target Area	Not Applicable
	Goals Supported	Homeless Assistance & Prevention
	Needs Addressed	End Homeless Prevention
	Funding	CDBG: \$30,000
	Description	Residential Emergency Shelter Services is a temporary living facility that is designed to insure the client's safety. The services primarily address immediate and short-term needs of battered women and their children. Non-Residential Services are provided to individuals who are not in need of emergency shelter, but are still in need of individual and/or group counseling, legal advocacy, legal representation, or other services in order to address the trauma of domestic violence and/or sexual assault.
	Target Date	9/30/2019

	Estimate the number and type of families that will benefit from the proposed activities	335 low and moderate income persons
	Location Description	Address is suppressed.
	Planned Activities	Funds will be used for a portion of the Shelter director and/or assistant shelter director salaries.
6	Project Name	Fairoaks Senior Housing Project
	Target Area	Not Applicable
	Goals Supported	Affordable Rental Units
	Needs Addressed	Affordable Housing
	Funding	HOME: \$108,000
	Description	Project consists of purchasing and installing 20 HVAC units at Fairoaks of Denton. Fairoaks serves residents age 62 and older, whose income is at or below 50 percent of the AMI and provides affordable senior housing.
	Target Date	7/31/2019
	Estimate the number and type of families that will benefit from the proposed activities	41 low and moderate income households
	Location Description	1950 Lattimore Denton, Texas 76209
7	Planned Activities	Funds will be used for the public improvements of Fairoaks Senior Complex and include purchasing and installing 20 HVAC units.
	Project Name	Home Improvement Program
	Target Area	Not Applicable
	Goals Supported	Housing Rehabilitation
	Needs Addressed	Affordable Housing
	Funding	HOME: \$355,082
	Description	The Home Improvement Program provides assistance with rehabilitation of owner-occupied structures in targeted neighborhoods for low and moderate-income families. Funds are available in low interest loan and grant combinations. Homes that are not suitable for rehabilitation are demolished and reconstructed. HOME funds includes \$146,950 of 2016 and 2017 reallocated funds.
	Target Date	7/31/2019
	Estimate the number and type of families that will benefit from the proposed activities	3 low and moderate income households
	Location Description	This is a city-wide program. Application are taken at the Community Development Division at 601 E. Hickory, Suite B, Denton Texas 76205.

	Planned Activities	Funds will be utilized on rehabilitation or reconstruction costs and program administration costs.
8	Project Name	Parks and Recreation - Kids Summer Camp
	Target Area	Not applicable
	Goals Supported	Public Services
	Needs Addressed	Provision of Public Services
	Funding	CDBG: \$25,000
	Description	Denton Summer Camp programs provide various cooperative games for indoor and outdoor activities, arts & crafts, field trips, and swimming. These activities are designed to: Integrate recreation with tutorial mentoring efforts and teach important values and life skills such as leaderships, respect for others and self.
	Target Date	9/30/2019
	Estimate the number and type of families that will benefit from the proposed activities	56 low and moderate income persons
	Location Description	Civic Center, Denia Recreation Center, McMath Middle School, and MLK Recreation Center
	Planned Activities	Funds will be used for Staff salaries and camp program costs.
9	Project Name	McKinney Sidewalk Project
	Target Area	Not Applicable
	Goals Supported	Public Facilities and Infrastructure Improvements
	Needs Addressed	Public Facilities and Infrastructure Improvements
	Funding	CDBG: \$80,870
	Description	Project consists of constructing a sidewalk on the north side of McKinney Street from Bell Place to Frame Street.
	Target Date	7/31/2019
	Estimate the number and type of families that will benefit from the proposed activities	4140 people / 73.79% low and moderate income persons.
	Location Description	McKinney Street from Bell Place to Frame Street on the north side of the street / Census Tract 20602 Block Group 2; Census Tract 20602 Block Group 3; and Census Tract 21202 Block Group
	Planned Activities	Funds will be used for construction costs for the sidewalk.
10	Project Name	Minor Repair Program
	Target Area	Not Applicable
	Goals Supported	Housing Rehabilitation
	Needs Addressed	Affordable Housing
	Funding	CDBG: \$75,000

	Description	Program serves low-income homeowners by providing a grant of up to \$10,000 for repairs. Repair cannot be covered by homeowner's insurance.
	Target Date	7/31/2019
	Estimate the number and type of families that will benefit from the proposed activities	15 low and moderate income households
	Location Description	This is a city-wide program. Application are taken at the Community Development Division at 601 E. Hickory, Suite B, Denton Texas 76205.
	Planned Activities	Funds will be used for rehabilitation costs for minor repairs.
11	Project Name	MLK Playground Replacement Project
	Target Area	Not Applicable
	Goals Supported	Public Facilities and Infrastructure Improvements
	Needs Addressed	Public Facilities and Infrastructure Improvements
	Funding	CDBG: \$160,500
	Description	Project consists of replacement two existing playground structures; one for age's two to five, and the other for age's five to twelve. The project will serve low to moderate families in the South East Denton area.
	Target Date	7/31/2019
	Estimate the number and type of families that will benefit from the proposed activities	4934 people / 89.85% low and moderate income persons.
	Location Description	MLK Recreation Center at 1300 Wilson Street in Southeast Denton - Census Tract 21202 Block Group 1
12	Planned Activities	Funds will be used to replace existing playground structures.
	Project Name	Salvation Army of Denton
	Target Area	Not Applicable
	Goals Supported	Homeless Assistance & Prevention
	Needs Addressed	End Homeless Prevention
	Funding	CDBG: \$20,000
	Description	Shelter K.A.R.E. Kitchen: Serves breakfast and dinner daily to shelter clients and community members. Breakfast is served from 6:00am to 7:00am and Dinner from 6:00pm to 7:00pm. Food Pantry: Gives groceries monthly to individuals and families in the community who express a need and is open on Wednesdays and Fridays from 1:00pm to 4:00pm.
	Target Date	9/30/2019

	Estimate the number and type of families that will benefit from the proposed activities	2202 persons
	Location Description	1508 East McKinney Street, Denton TX 76209
	Planned Activities	Funds will be used for purchase of food products.
13	Project Name	Special Programs for Aging Needs (SPAN)
	Target Area	Not Applicable
	Goals Supported	Public Services
	Needs Addressed	Provision of Public Services
	Funding	CDBG: \$20,500
	Description	Our senior nutrition program provides hot, nutritionally regulated noon-time meals to seniors 60+ and disabled every Monday - Friday. Congregate meals are provided at 4 Denton locations. Meals for home-bound seniors are delivered by caring volunteers that provide a daily check-in as well.
	Target Date	9/30/2019
	Estimate the number and type of families that will benefit from the proposed activities	390 persons
	Location Description	Denton Senior Center, American Legion Senior Center, Primrose Apartments, Heritage Oaks Apartments
	Planned Activities	Funds will be used for cost of food for meals.
14	Project Name	Thomas Street Water & Sewer Project
	Target Area	Not Applicable
	Goals Supported	Public Facilities and Infrastructure Improvements
	Needs Addressed	Public Facilities and Infrastructure Improvements
	Funding	CDBG: \$138,740
	Description	Project consist of replacing both the water and sewer lines on Thomas Street between Scripture Street and Oak Street.
	Target Date	7/31/2019
	Estimate the number and type of families that will benefit from the proposed activities	1765 people / 79.6% low and moderate income persons.
	Location Description	Thomas Street from Scripture and Oak - CT 20700 BG 1
	Planned Activities	Funds will be used for construction costs to replace water and sewer lines.
15	Project Name	Wayne Street Water & Sewer Project
	Target Area	Not Applicable
	Goals Supported	Public Facilities and Infrastructure Improvements
	Needs Addressed	Public Facilities and Infrastructure Improvements
	Funding	CDBG: \$79,183

	Description	Project consist of replacing both the water and sewer lines on Wayne Street between Boyd to Mozingo Streets.
	Target Date	7/31/2019
	Estimate the number and type of families that will benefit from the proposed activities	2415 people / 60.04% low and moderate income persons.
	Location Description	Wayne Street from Boyd to Mozingo Streets - CT 20602 BG 2
	Planned Activities	Funds will be used for construction costs to replace water and sewer lines.
16	Project Name	Unprogrammed Funds
	Target Area	Not Applicable
	Goals Supported	Not Applicable
	Needs Addressed	Not Applicable
	Funding	CDBG: \$2,465
	Description	Unprogrammed Funds. Action Plan was prepared using preliminary HUD allocations and will be revised when the final allocations amounts are provided and all funds will be allocated to projects or activities.
	Target Date	Not Applicable
	Estimate the number and type of families that will benefit from the proposed activities	Not Applicable
	Location Description	Not Applicable
	Planned Activities	Not Applicable

AP-50 Geographic Distribution – 91.220(f)

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

The City of Denton's CDBG and HOME allocations have not been sufficient to allow for the funding of large or extensive housing, economic development or public works projects. Geographic standards do not apply to city-wide programs such as Minor Repair, Homebuyer Assistance and public services programs. The small amount of funds available, and continued reductions for the past several years has limited the use of funds. Public facility and public improvement projects have been completed in residential areas meeting HUD's low to moderate-income standards, generally near the city's core.

Geographic Distribution

Target Area	Percentage of Funds

Table 8 - Geographic Distribution

Rationale for the priorities for allocating investments geographically

The City of Denton does not currently direct its investments in specific geographic areas.

Discussion

Housing assistance investments, including the Minor Repair, Home Improvement, Infill New Construction Program, and Homebuyers Assistance programs are based on a first-come, first-served basis and there are no specific geographic areas. However, the Home Improvement program does set forth some specific guidelines regarding the age of the housing. Regardless of the area income, housing units that were built 20 years ago or less, are not eligible for Home Improvement Program assistance and units that were built 15 years ago or less are not eligible for the Minor Repair Program. These requirements support the use of funds in older neighborhoods.

All investments in public facilities and/or public improvements are based on requests received from residents of the low to moderate-income block groups and other areas of the city. After a request has been made, City staff will assess the need for the improvement and the project cost. The City staff evaluation will determine which requests are in a "high" needs category, are an appropriate use of CDBG funds, and are projects with costs that can be covered under the CDBG allocation.

Affordable Housing

AP-55 Affordable Housing – 91.220(g)

Introduction

The City's housing priorities are encouraging homeownership opportunities, maintaining existing affordable housing units and encouraging and maintaining standard affordable rental units for low and moderate income persons. For the 2018-19 program year, these priorities will be addressed through the following activities: rehabilitation of rental properties by the Denton Affordable Housing Corporation, rehabilitation or reconstruction of housing units through the Home Improvement Program, minor rehabilitation of housing through the Minor Repair Program, rehabilitation of rental units for Fair Oaks Senior Complex.

One Year Goals for the Number of Households to be Supported	
Homeless	5
Non-Homeless	18
Special-Needs	41
Total	64

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

One Year Goals for the Number of Households Supported Through	
Rental Assistance	0
The Production of New Units	0
Rehab of Existing Units	64
Acquisition of Existing Units	0
Total	64

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

Discussion

Not applicable.

AP-60 Public Housing – 91.220(h)

Introduction

Not applicable. The City of Denton has no public housing units.

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

Not applicable. The City of Denton has no public housing units.

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

Not applicable. The City of Denton has no public housing units.

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

Not applicable. The City of Denton has no public housing units.

Discussion

Not applicable. The City of Denton has no public housing units.

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

Introduction

This section describes the activities planned during the 2018/19 program year to address the needs of persons who are homeless and other non-homeless needs.

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

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

One year goals:

- Promote positive housing focused strategies by focusing on permanent housing solutions
- Improve Coordinated Entry Housing Priority List to track and prioritize people who have the greatest service needs identified through Coordinated Entry

Understanding that the community must identify and continually engage all sheltered and unsheltered persons who are currently experiencing homelessness including those who are in jeopardy of experiencing chronic homelessness, City of Denton funding partners participate in coordinated efforts to outreach to persons experiencing homelessness and a focus on our expanding Coordinated Entry (CE) system which will be supported by City general funds. This effort has led to the creation of a community Housing Priority List (HPL) that allows the community to track and prioritize people who have the greatest service needs identified through Coordinated Entry. Efforts will be targeted to improve the HPL and support Case Conferencing to ensure every person experiencing homelessness has a pathway to a permanent housing solution.

Annually, the City participates in the Point-In-time (PIT) Count in order to reach out and assess the needs of persons experiencing homelessness. City staff led the 2018 Point-in-Time Count and will continue to support the annual count by participating in the coordination and implementation of the PIT Count.

In addition, the City supports street outreach and coordinated Entry programs through grants and staff human resources. To directly reach out to sheltered and unsheltered homeless persons partners complete street outreach in collaboration with Giving Hope, Inc. (GH), the Denton Police Department, Denton County Veterans Coalition, Denton County MHMR, volunteers and other service providers. The street outreach team provides case management delivered directly to the unsheltered homeless on the street. All street outreach clients are assessed for needs and intakes are entered into HMIS using our Coordinated Entry (CE) system. Denton County Friends of the Family (DCFOF) and The Salvation Army (TSA) Case Managers are reaching out to clients receiving emergency services like food and with crisis hotlines. DCFOF's Crisis Line staff and Community Educators reach out daily to persons experiencing

homelessness and those at-risk who are victims of domestic violence. DCFOF Community Educators and TSA Coordinators lead outreach efforts at community events to educate the community about available services. Housing assistance provider, Giving Hope, Inc.'s (GH) Case Manager completes scheduled visits to both shelters as outreach. The system is aligned with other HUD programs such as GH's PSH and Denton County MHMR's PSH programs that are also pulling people off of the HPL as housing units and funding for housing assistance is available.

Addressing the emergency shelter and transitional housing needs of homeless persons

The City of Denton addresses the emergency shelter (ES) and transitional housing (TH) needs of persons experiencing homelessness through the City's general fund; Community Development Block Grant (CDBG) funds; acting as lead agency for a collaborative using Emergency Solutions Grant (ESG) Funds awarded through the Texas Department of Housing and Community Affairs (TDHCA) and dedicated human resources. Specifically, general funds have been allocated to Monsignor King Outreach Center and CDBG funds for Denton County Friends of the Family for ES. General funds are allocated to Giving Hope for its housing program. The community has picked up on support of transitional housing programs and Denton County Friends of the Family has been awarded other federal funding for transitional housing so the City is better able to leverage community resources with the City's. These are examples of how the City coordinates local resources and leverages local tax revenues, state of Texas distributed HUD funds, and federal CDBG funds ensure the emergency shelter and transitional housing needs of homeless persons are assessed.

The community completes data analysis of HMIS and Coordinated Entry (CE) system reporting for all homeless programs including emergency shelter and supportive housing programs. The City provides general funds to support HMIS and CE. We are able to assess the ES and TH needs through: performance reporting by service providers; the annual PIT Count; CE's shared assessment tool, the VI-SPDAT; and the Housing Priority List (HPL). For example, under GH's street outreach clients are assessed for housing needs and Intake Coordinators at DCFOF and Case Managers TSA are assessing needs of the shelter clients during intake, CE assessments, and through on-going case management. The CE assessment tool and HPL provide immediate assessment of needs and referral to housing. These provide key data for the community to complete a comprehensive analysis of the homeless system to identify needs, gaps in housing needed and to use data to inform housing, programming and funding decisions.

Investment in supportive housing programs aims shorten the length of time people experience homelessness and increase the number of people experiencing homelessness who are transitioned to transitional and permanent housing. The strategy will focus ES and TH programs as stop-gap measures available until a permanent housing is available. These provide much needed stability where a permanent housing solution is not available offering housing stability case management that ensures a more stable transition to independent living.

Helping homeless persons (especially chronically homeless individuals and families, families

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

Evidenced based practice supports providing housing assistance programs that combine the financial housing assistance, case management, and supportive services to help persons experiencing homelessness transition to permanent housing and independent living. As described in previous sections, the City of Denton and funding partners are a part of a larger developing community housing crisis response system coordinating these efforts.

The primary goal is to maximize the implementation of Coordinated Entry (CE) system through which persons experiencing homelessness are assessed for their housing needs and referred to the most appropriate housing intervention available. The CE assessment tool provides key data for the community to complete a comprehensive analysis of the homeless system to identify important system performance measures like the length of homelessness and gaps and returns to homelessness. This data will inform housing, programming and funding decisions this year and those to come. This year, City of Denton general funds, Community Development Block Grant (CDBG), and ESG funding, will support partner agencies to participate in Coordinated Entry (CE) and HMIS reporting (or HMIS comparable database).

Shortening the length time that individuals and families experience homelessness. The CE system is specifically designed to reduce the time that it takes for a person who is homeless to have housing needs identified and referred to the right housing option. CE means that all agencies are using the same assessment identifying housing need and then placing people on the single shared Housing Priority List (HPL). Street outreach is referring to one of the local shelters, DCFOF, MKOC , and TSA which directly connects to CE and the HPL with referral to a housing assistance program like GH TH program and RRH, GH and Denton County MHMR's PSH; and the Denton Housing Authority for housing choice voucher assistance. When the next unit is available these providers, pull people off the HPL based on most critical prioritized need first. This is combined with housing stability for a swift transition to independent living. In addition to general funds that support ES through MKOC and CDBG funds for DCFOF and general funds that support CE and GH's TH program, the City supports these CoC-grant funded PSH programs administered by GH and MHMR, by providing certification of consistency with the Con Plan each year.

Facilitating Access. To reach more vulnerable populations experiencing homelessness, having sufficient housing options will be a key to ensure every person in need has a choice for housing regardless of their current circumstance. As a compliment to the housing crisis response system, we will be hosting a

housing summit as a part of a broader community Landlord Engagement Initiative to increase the awareness of landlords about homeless prevention programs and increase the number of landlords willing to lower barriers to housing and accept homeless households. The City has implemented a deposit waiver program for persons experiencing homelessness that helps to lower a barrier to housing.

Preventing individuals and families who were recently homeless from becoming homeless again. Because we do not want clients in supportive housing programs to exit to homelessness or return to homelessness, clients with programs like Giving Hope, Inc.'s TH and PSH through MHMR and GH receive housing stability case management: education/employment assistance, life skills, transportation, financial empowerment, and applying for government benefits and support. Generally, housing assistance is three to six-months but RRH can provide extended support for clients who were assessed to need longer support necessary to ensure housing stability.

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

The most effective tool for assisting low-income individuals and families to avoid becoming homeless is to ensure there are housing assistance resources to prevent individuals and families at risk from becoming homeless in the first place. Through coordinated strategies we are able increase funding and use existing funding more efficiently for homelessness prevention programs including housing stabilization resources; case management; and supportive services needed to help maintain housing.

Christian Community Action (CCA) and Giving Hope, Inc. (GH) have case managers working with individuals and families identified at-risk in homeless prevention programs because of imminent eviction. City General funds have been allocated to Giving Hope, Inc. and Interfaith Ministries to provide Homeless Prevention assistance to help low-income individuals and families avoid becoming homeless. The programs provide direct housing and utility assistance and housing stability case management like budget planning, financial management, employment counseling, etc. Interfaith is also awarded funds from the City that assist families with utilities thus reducing housing instability.

Shelters work to avoid discharging clients back into homelessness. Denton County Friends of the Family (DCFOF) and The Salvation Army Denton in collaboration with housing providers like GH will expand extended shelter stays for shelter residents referred for housing assistance to allow more time to secure housing, employment, education, and other needs that help to overcome barriers to housing. Often sheltered individuals must wait extra time when requesting rapid rehousing funds or pending property

readiness for housing.

For those who are likely to become homeless after being discharged from a publicly funded institution or system of care, the City allocates general funds for Coordinated Entry (CE). In alignment with the BoS CoC recommendations for CE, part of that strategy is a communication plan for educating the public on how to referral into the CE system which include building working relationships with institutions and systems of care such as health-care facilities, mental health facilities, foster care or other youth facilities, corrections programs and institutions and receiving assistance from public or private agencies that address housing, health, social services, employment, education or youth needs to ensure timely referrals to avoid a person becoming homeless upon discharge. There is ongoing outreach to these facilities and community partners to help reduce people being discharged to homelessness.

Discussion

In addition to the efforts discussed in previous sections, the City continues to support activities that ensure there are resources to prevent those who are not homeless, but have other special needs, from becoming homeless. Here are a few examples:

- CDBG funds support SPAN's congregate and meal delivery programs that help the elderly and frail with food security and self-sufficiency that contribute to housing stability.
- CDBG funds to the Salvation Army Denton for Daily meals and a Food pantry that helps the homeless and those at-risk with food security and self-sufficiency that contribute to housing stability.
- City's general fund support of CASA that ensure children aging out of the foster care system have resources and will not exit to homelessness.
- ESG funds for street outreach programs for Giving Hope, Inc. provide outreach to the chronically homeless on the street. This program includes HIV testing to help identify those who are at risk and prioritize them for other permanent housing assistance programs.
- City's general funds support of Retired Senior Volunteer Program helps provide support to seniors.
- City's general funds support of three sliding scale early childhood education programs that help low-income families with safe, affordable child care and provide children with developmentally appropriate care that helps prepare them to be school ready.
- City's general fund support of Our Daily Bread for a coordinator to manage all programs related to social services, referrals provided to client and maintain the Homeless Information Management System database including serving as the primary workaround for Denton County Friends for the Family clients to be included in the HPL for access to available housing solutions.

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

Introduction:

This section describes the City's plan to address barriers in affordable housing identified in the 2015 Analysis of Impediments to Fair Housing Choice (AI).

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

The City of Denton's Analysis of Impediment to Fair Housing does not indicate that the current public policies create barriers to affordable housing. The following is an explanation of Denton's policies:

1. In February 2002, the City of Denton adopted the Denton Development Code, a document that unifies elements of zoning, subdivision regulation, environmental protection, site design standards, and other development regulation. Development Services staff is currently working to update the Development Code. The update of the Code, will be completed in August 2018. Community Development will review the Code after completion
2. The zoning regulations contain 10 districts that allow single-family dwellings. Mixed-use structures are encouraged in some districts allowing the development of retail or office on lower floors with multi-family residential above. Denton's comprehensive plan, Denton Plan 2030, and formerly The Denton Plan, will continue to guide the regulatory framework to encourage a diversity of population and income levels, accessibility to employment, recreation, school and community uses, and connection to public transit.
3. Construction codes allow for the renovation of existing, usually older and more affordable units. Under these codes, units would not have to bear the increased costs of new construction codes unless a health or safety issue is present.
4. Lots of record which may not meet current area requirements are "grandfathered" in some circumstances.
5. The City of Denton building code requirements are reviewed by the Health and Building Standards Commission. This commission is a council-appointed citizen committee. Members are generally from the development community and are careful to ensure that adopted codes do not discourage development activities.
6. The number of affordable housing units in the City of Denton as compared to other communities in Denton County indicates that current development policies do not hinder the development of a variety of housing units, including affordable units.

Discussion:

The City of Denton Community Development staff is currently participating in a DFW Regional Assessment of Fair Housing. Denton and several other communities, including Dallas, Plano, McKinney, Garland, Frisco, and others are working to determine areas of need and activities that can assist communities in promoting fair housing throughout the DFW metroplex.

AP-85 Other Actions – 91.220(k)**Introduction:**

This section reports additional effects the City will undertake during the 2017-18 program year to address residents' housing and community development needs.

Actions planned to address obstacles to meeting underserved needs

- Seek out additional funding sources to support housing and public services activities;
- Assist local non-profit organizations in obtaining grants or other funding to support their efforts;
- If necessary, act as a “pass through” organization to continue use of State and other funding to support homeless prevention and services for the homeless;
- Continue to support existing public (social) services programs through the allocation and administration of City of Denton general fund dollars.
- Work with the City's Development Services Department to implement recommendations included in the Denton Plan 2030.

Actions planned to foster and maintain affordable housing

- Continue to provide down payment, closing cost, and principal reduction assistance to low and moderate-income homebuyers through the Homebuyer Assistance Program;
- Fund new affordable housing development through Habitat for Humanity of Denton County;
- Continue to fund the City's Home Improvement and Minor Repair programs to assist low and moderate income homeowners with repairs to their homes to meet their needs for safe and decent housing;
- Continue to support the Denton Affordable Housing Corporation's (DAHC) efforts to increase the number of affordable housing units including their Affordable Housing Opportunity and Rental Rehabilitation programs;
- Work with the Denton Housing Authority to support the development of additional affordable housing and obtain additional housing vouchers if available;
- Work with the City's Development Services Department to implement recommendations

included in the Denton Plan 2030.

Actions planned to reduce lead-based paint hazards

During the 2018-19 program year, Denton plans to reduce lead-based hazards in Denton by ensuring that all lead-based regulations are met throughout any housing rehabilitation construction activity performed on homes built prior to 1978 including the Minor Repair Program, Home Improvement Program, Homebuyer Assistance Program, and DAHC's Rental Rehabilitation. Denton will also seek opportunities to educate the public, housing services customers, and contractors regarding the hazards of lead-based paint.

Actions planned to reduce the number of poverty-level families

The City of Denton will continue to work with local non-profit organizations to administer programs designed to support lower income individuals and families. These programs will assist households in improving their financial status. Programs include: 1) free and/or low cost health care; 2) affordable child care; 3) mental health care services; 4) support for elderly households and others; develop housing initiatives to support veterans.

The following are Denton's current efforts supporting the Consolidated Plan goal of low and moderate income persons having the opportunity to earn higher wages.

- The City of Denton Economic Development staff participates with regional municipalities and the local Texas Workforce Commission Board in the North Central Texas Regional Economic Development Steering Committee for the purpose of addressing existing and future workforce skills needs of our respective and regional employers. The Committee is a participant in Texas Workforce Commission's High Demand Job Training Program that identifies and develops the skill sets of individuals for jobs in high-demand occupations in our respective region and cities.
- Denton's Economic Development Partnership Board adopted a Strategic Plan that provides a means to address Denton's key workforce needs.
- Denton ISD's Career and Technology Advisory Board industry partners provide curriculum expertise and internship opportunities to students enrolled in the district's 31 career skills and certification training programs covering 11 career fields. Dual high-school/college credit classes are offered to high school juniors and seniors.
- North Central Texas College (NCTC) has developed certifications and associate degree programs for specific industry partners, such as the Petroleum Technology Certification and Associate Degree options. NCTC is a partner to businesses utilizing Skills Training grant funds.

Actions planned to develop institutional structure

The two institutional gaps stated in the 2015-2019 Consolidated Plan included the provision of

homebuyer education classes for low and moderate-income new homebuyers and supportive housing. To meet the provision homebuyer education during the 2018-19 program year, Denton is investigating partnerships with HUD-approved Housing Counseling Agencies and Denton Affordable Housing Corporation to develop a more comprehensive educational program. Currently HUD-approved Housing Counseling Agencies are in the process of complying with the new Housing Counseling Certification Requirements. Agencies will have 36 months from the new rule to comply with the new regulations.

As discussed in SP-40 the City will support a community organized collective Impact initiative with its funding partner the United Way of Denton County. In addition, the City will support collaborative efforts of the Denton County Homeless Coalition (DCHC) and other service sector programs to ensure the community is organized to advocate; coordinate service delivery; improve effective use of available resources and provide leadership for long-term planning efforts among various homeless providers, homeless advocates and across multiple sectors.

Strategies to move the homeless to housing and to shorten the length of time a person or family experiences homeless involve:

- Supporting a coordinated access network to significantly reduce the time it takes for a person who is homeless to identify and access the right services needed.
- Improving community capacity by seeking to increase local resources for housing programs including housing location and stabilization resources; case management; and supportive services.
- Facilitating coordination of case management and supportive services to help the homeless have access to the services necessary to secure housing and maintain housing stability.
- Increasing supportive housing options for those with prioritized special needs.

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

The City of Denton has a very strong network of service providers including those providing housing, education, health care and other needed services. Over the past four years, the United Way of Denton County, the City of Denton, the Denton Independent School District and other organizations have joined together to review and discuss the provision of services in the Denton area in an attempt to maximize the benefits derived from available resources.

Below is a list of the committees that have been developed to assist in improving the coordination of

services:

- Denton County Homeless Coalition
- Homeless Leadership Tea, collective impact project
- Behavioral Health Leadership Team, a collective impact project
- Community Health Council
- Denton Hunger Coalition
- Early Childhood Coalition serving the North Texas Region
- United Way's Community Needs Assessment Committee

City of Denton Community Development (CD) staff members will continue to participate in the above committees during the 2018/19 program year. The City is part of a strong team of service providers who are working to improve services for the low income community.

In addition, the Mayor of Denton convened a Task Force in 2015 supported by Community Development (CD) staff to look at the issue of homelessness. Three priorities were identified by the task force.

1. Funding – Increase in Available Resources
2. Housing – Coordinated, Accessible, and Affordable
3. System Design – to establish a network of Community Collaboration

Nested in the ideas for program and housing interventions for the homeless was stronger community collaboration around shared community goals to end homelessness; better data collection and sharing; involvement of a wider audience of stakeholders; and more intentional effort to help educate and inform the community about solutions to homelessness and community impact efforts. Ultimately, the priorities that the task force recommended to City Council for their support and consideration were to seek funding to seed new collaborative projects.

The task force recommends have resulted in a public private partnership between the City of Denton and the United Way of Denton County to fund a coordinator position to oversee a collective impact project that will develop and implement community-wide coordinated strategies toward the shared goal of ending homelessness.

Discussion:

Not Applicable

Program Specific Requirements

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

Introduction:

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

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

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

Other CDBG Requirements

1. The amount of urgent need activities	0
2. The estimated percentage of CDBG funds that will be used for activities that benefit persons of low and moderate income. Overall Benefit - A consecutive period of one, two or three years may be used to determine that a minimum overall benefit of 70% of CDBG funds is used to benefit persons of low and moderate income. Specify the years covered that include this Annual Action Plan.	80%

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

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

The City of Denton does not utilize other forms of investment beyond those identified in 92.205(b). The City will not permit other forms of investment without the prior approval of HUD.

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

Recapture Policy

Denton uses recapture as required by the HOME regulations. Recapture occurs when the homebuyer during the affordability period, sells the property, leases the property, property is not primary residence, the property is foreclosed on by any lender, or when the recipient violates the covenants contained in the Written Agreement between the homebuyer and the City of Denton or Denton Affordable Housing Corp. The terms are contained in the Written Agreement.

If the home is sold during the affordability period, a portion of the net sales proceeds, if any, are returned to be used for other HOME-eligible activities. The portion of the net sales proceeds that is returned is equal to the amount of HOME funds invested in the property less the amount for each full month that the residence was occupied by the homebuyer or property owner as his/her/their principal residence. Any funds remaining after the distribution of the net sales proceeds to all lien holders, including the City of Denton, will be returned to the homeowner. In the event of a sale, short sale or foreclosure, the amount recaptured will be limited to the amount of 'net sales proceeds' available at the time of such occurrence. If there are insufficient funds remaining from the sale of the property and the City recaptures less than or none of the recapture amount due, and maintain data in each individual file that provides the amount of the sale and the distribution of the funds. This will document that there were no net sales proceeds; or the amount of the net sales proceeds was insufficient to cover the full amount due; and that no proceeds were distributed to the homeowner.

Resale Policy:

Under most circumstances, the recapture provisions outlined above will be used in HOME homebuyer activities. However, resale restrictions may be used when HOME Program funds are used only as a development subsidy for the construction and no homebuyer assistance is provided. Resale restrictions will ensure that housing assisted with HOME funds is made available for resale only to HOME program eligible low-income households that will use the property as their principal residence.

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

Recapture Policy

The affordability period stated in the note and deed of trust is the minimum period for the project.

The affordability period is determined by the amount of HOME assistance.

The Recapture mechanisms used to secure the affordability of the HOME assisted unit are recorded in accordance with state law with a promissory note, deed of trust and written agreement with the City of Denton. The amount subject to recapture is reduced based on a pro rata reduction during the affordability period. In all cases, the amount to be repaid is the subsidy provided directly to or on behalf of the homebuyer for closing costs and is limited to the net proceeds of the sale, which is defined as the sales price minus the first lien and seller paid closing costs and includes only the following items to the extent actually incurred: brokers commission, reasonable attorney fees, and any transfer tax or recording fee payable by the seller.

Resale Policy:

The affordability period is determined by the total investment of HOME funds in the unit. The Resale mechanisms used to secure the affordability of the HOME assisted unit are recorded in accordance with state law with a promissory note, deed of trust and written agreement with the subrecipient and the City of Denton as beneficiary.

If the assisted property is sold while under the resale restrictions, the home must be sold to a HOME eligible buyer approved by either the City or subrecipient. The price at resale must provide the original HOME-assisted homebuyer a fair return on the investment and be affordable to a reasonable range of low-income buyers. Therefore, sales price during affordability can occur at market value with the following limitations.

Fair return on investment is defined as the purchase price, plus 25% of the increase in value at the time of resale based on the valuation performed by an appraiser. The appraisal will be used at the time of the original purchase and at resale. Any capital improvements will be determined by the appraisal at the time of resale. The price shall not exceed a price that results in net proceeds (after first lien and sales costs) to the seller that exceeds: the reimbursement of the original owner's investment including down payment and closing costs made at the time of initial purchase, if any; the value of capital improvements to the property as determined by an appraisal, if any; the principal amortized on the first lien during the period of ownership.

Affordable to a range of low-income buyers: a) housing must be affordable to subsequent purchaser's at no more than 30% of monthly income for payment of principal, interest, taxes and insurance; b) homebuyer must be a qualified low-income family with less than 80% of area median income; c) If the property is no longer affordable to qualified homebuyers at the time of resale, the City or subrecipient may take reduce the sale price by layering HOME subsidy in the form of down payment assistance and extending the affordability period. This may result in sales price being different to the seller than to the subsequent homebuyer. Upon the resale of the home, the property must pass local building codes for existing housing. The City shall determine who is

responsible for the necessary repair costs to bring the property up to standards.

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

The City of Denton does not currently use of HOME funds to refinance existing debt secured by multi-family housing that is being rehabilitated with HOME funds.

Discussion:

Under the HOME program, eligible applicants must have household income at or below 80% of the AMI and meet program guidelines to be eligible. Funding is available on a first-come first-serve basis. Applications for assistance are available at the Community Development Office. Under the Home Improvement Program, applicants complete a waiting list application and as funds are available, CD Staff will submit a letter requesting that if still interested an appointment can be made to assist with the application. Under the Homebuyer Assistance Program, interested applicants apply for a mortgage company and if eligible for a mortgage loan, the mortgage company submits application to the Community Development Division. Staff schedules appointments with applicant to review application and guidelines. Information on the programs is available on the City of Denton's website.

The budget process for Denton's community development programs begins almost one year in advance of the fiscal year. HUD notifies the City as to the level of funding expected, the public participating process begins, applications are solicited locally and received by the Community Development Staff, the Community Development Advisory (CDAC). Recommendations are then formulated and presented to the Mayor and the City Council. The final step is the submittal of the City's formal applications, Action Plan, to HUD for the funds allocated to Denton. The City of Denton's fiscal year runs from August 1 to July 31.

Any nonprofit or for-profit groups, especially those serving the community development needs of low and moderate income people, the disabled, minorities or the elderly are encouraged to participate in the implementation of Denton's Community Development programs. Interested groups are encouraged to attend public hearings.

(vi) The participating jurisdiction may limit the beneficiaries or give preferences to a particular segment of the low-income population only if described in the action plan.