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### Attachments:

Attachment 1:	Certification of Publication
Attachment 2:	Approving Resolution
Attachment 3:	Reports
	PR-03 – CDBG Activity Summary Report
	PR-06 – Summary of Consolidated Plan Projects
	PR-23 – CDBG Summary of Accomplishments
	PR-26 – CDBG Financial Summary Reportp
	PR-26 – CDBG-CV Financial Summary Reportp



## CR-05 - Goals and Outcomes

### **Progress the jurisdiction has made in carrying out its strategic plan and its action plan. 91.520(a)**

This document constitutes the City of El Centro's Consolidated Annual Performance and Evaluation Report (CAPER) for the use of Community Development Block Grant (CDBG) funds during FY 2019-2020. This report was prepared using the eConPlanning Suite system developed by the U.S. Department of Housing and Urban Development (HUD). The system prescribes the structure and contents of this document, following HUD's Consolidated Planning regulations.

The City of El Centro's 2019-2023 Five-Year Consolidated Plan describes the City's vision and strategies for improving the community using federal grant funds. The Five-Year Consolidated Plan was developed through consultation with the community and City department staff. Through this public outreach process, community priorities and needs were evaluated, goals and objectives were developed, and performance benchmarks for housing and non-housing community needs were identified.

The current Five-Year Consolidated Plan was adopted on April 2, 2019, for the period of FY 2019-20 to FY 2023-24. The Consolidated Plan is implemented through One-Year Action Plans that outline specific objectives and projects to address the priorities and needs identified. The FY 2019-20 One-Year Annual Action Plan was adopted on April 2, 2019. This report summarizes the actions undertaken during FY 2019-20 in the City of El Centro (which is the first year of the five-year Consolidated Plan period) and the progress towards achieving the five-year goals.

During the 2019-2020 Fiscal Year, the City's Economic Development Division utilized CDBG funding to perform substantial improvements to public facilities, make investments to nonprofit organizations and provided for Code Enforcement efforts throughout the CDBG Target Area.

### **Comparison of the proposed versus actual outcomes for each outcome measure submitted with the consolidated plan and explain, if applicable, why progress was not made toward meeting goals and objectives. 91.520(g)**

Categories, priority levels, funding sources and amounts, outcomes/objectives, goal outcome indicators, units of measure, targets, actual outcomes/outputs, and percentage completed for each of the grantee's program year goals.



Goal	Category	Source / Amount	Indicator	Unit of Measure	Expected Strategic Plan	Actual Strategic Plan	Percent Complete	Expected Program Year	Actual Program Year	Percent Complete
Activities for Youth and At-Risk Youth <i>EC Police Athletic League</i>	Non-Homeless Special Needs	CDBG: \$7,500	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	340	157	46.18%	500	157	31.40%
Affordable Rental and Homeownership Opportunities	Affordable Housing	CDBG: \$0.00	Homeowner Housing Added	Household Housing Unit	1	0	0.00%	0	0	0.00%
Asbestos Testing and Removal <i>-Asbestos Testing/Abatement Program</i>	Affordable Housing	CDBG: \$10,000	Homeowner Housing Rehabilitated	Household Housing Unit	3	0	0.00%	1	0	0.00%
Blight and Substandard Housing Elimination <i>-Code Enforcement Program</i>	Affordable Housing Non-Housing Community Development	CDBG: \$82,480	Buildings Demolished	Buildings	1	0	0.00%	0	0	0.00%
			Housing Code Enforcement/Foreclosed Property Care	Household Housing Unit	750	0	12.4%	100	93	93.0%
Chronic Homeless Support Services <i>-Spread the Love Charity</i>	Homeless	CDBG: \$4,991	Homelessness Prevention	Persons Assisted	0	0	0.00%	200	0	0.00%



Code Enforcement <i>-Code Enforcement Program</i>	Non-Housing Community Development	CDBG: \$82,480	Housing Code Enforcement/Foreclosed Property Care	Household Housing Unit	750	93	12.4%	100	93	93.0%
Comply with Fair Housing Planning Requirements <i>-Fair Housing Services</i>	Affordable Housing	CDBG: \$46,417	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	2,500	251	20.0%	500	251	50.0%
Continuum of Care <i>-Spread the Love Charity -House of Hope</i>	Homeless Non-Homeless Special Needs	CDBG: \$13,491	Public service activities other than Low/Moderate Income Housing Benefit Homelessness Prevention	Persons Assisted	400	6	0.15%	205	6	2.92%
Crime and Fire Awareness and Prevention	Non-Homeless Special Needs	CDBG: \$0.00	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	100	0	0.00%	0	0	0.00%
Domestic Violence Support Services	Homeless Non-Homeless Special Needs	CDBG: \$0.00	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	340	0	0.00%	0	0	0.00%
Employment Opportunities <i>-Micro Loan Program</i>	Non-Housing Community Development	CDBG \$200,000	Businesses assisted	Businesses Assisted	1	0	0.00%	19	0	0.00%



Energy Efficiency	Affordable Housing	CDBG: \$0.00	Homeowner Housing Rehabilitated	Household Housing Unit	4	0	0.00%	0	0	0.00%
Expand the Economic Base <i>-Micro Loan Program -Infrared Thermometers</i>	Non-Housing Community Development	CDBG-CV: \$233,700	Businesses assisted	Businesses Assisted	1	114	114.0%	319	114	35.7%
Homeless Women, Children, and Families <i>-House of Hope</i>	Affordable Housing Non-Homeless Special Needs	CDBG: \$8,500	Public service activities other than Low/Moderate Income Housing Benefit  Homeless Person Overnight Shelter	Persons Assisted	180	18	10.0%	18	6	33.3%
Housing Rehabilitation Program <i>-Housing Rehab Program</i>	Affordable Housing	CDBG: \$96,000	Homeowner Housing Rehabilitated	Household Housing Unit	3	0	0.00%	2	0	0.00%
Improved and New Infrastructure <i>-Carlos Aguilar Park</i>	Non-Housing Community Development	CDBG: \$206,464 / State CDBG: \$19,500	Public Facility or Infrastructure Activities for Low/Moderate Income Housing Benefit	Public Facilities	5	1	20.0%	1	1	100.0%
Lead Based Paint Reduction <i>-Lead Based Paint Abatement Program</i>	Affordable Housing	CDBG: \$5,000	Homeowner Housing Rehabilitated	Household Housing Unit	5	0	0.00%	1	0	0.00%



Promote Fair Housing <i>-Fair Housing Services</i>	Affordable Housing Public Housing	CDBG: \$46,417	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	2,500	251	10.04%	500	251	50.20%
Public Services for Homeless <i>-Spread the Love Charity -House of Hope -Personal Protection Equipment for the Homeless</i>	Homeless Non-Homeless Special Needs	CDBG: \$13,491 CDBG-CV: \$33,000	Public service activities other than Low/Moderate Income Housing Benefit  Homelessness Prevention	Persons Assisted	400	206	0.15%	389	206	52.9%
Support Services for Seniors <i>-Senior Nutrition Program</i>	Non-Homeless Special Needs	CDBG: \$7,500 / State CDBG Program Income: \$4,500	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	340	56	16.47%	60	56	93.33%
Support Services for the LGBT Community <i>-IV LGBT Resource Center</i>	Non-Homeless Special Needs	CDBG: \$5,000	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	340	10	2.94%	16	10	62.5%

**Table 1 - Accomplishments – Program Year & Strategic Plan to Date**



**Assess how the jurisdiction’s use of funds, particularly CDBG, addresses the priorities and specific objectives identified in the plan, giving special attention to the highest priority activities identified.**

The City made significant progress in addressing the Priority Needs and Goals outlined in the One-Year Action Plan. During the year, CDBG funds were expended on projects that provided benefit primarily to low and moderate income individuals and households in the city. Projects underway and/or completed during the year included:

- McGee Park Bathroom / Snack Bar Project
- Carlos Aguilar Field 2 Project
- Meal delivery services for homebound and low-income seniors
- Shelter serving limited clientele (women and children) with shelter, case management, and food
- Recreational opportunities for at-risk youth
- Services for LGBTQ individuals
- Code Enforcement Program
- Fair Housing services to El Centro residents



### CR-10 - Racial and Ethnic composition of families assisted

Describe the families assisted (including the racial and ethnic status of families assisted). 91.520(a)

Race and Ethnicity	CDBG
White	634
Black or African American	34
Asian	1
American Indian or American Native	8
Other Multi Racial	9
<b>Total</b>	<b>686</b>
Hispanic	550
Not Hispanic	136

Table 2 – Table of assistance to racial and ethnic populations by source of funds

#### Narrative:

The City of El Centro and its subrecipients identify and priority community needs and offer services and programs to eligible persons/households regardless of race or ethnicity. Table 2 in Section CR-10 is generated by the HUD CAPER template, and the information reported reflects demographic information provided by the persons/households. For detailed demographic data, please view IDIS Reports-PR 23: CDBG Summary of Accomplishments which is included in Attachment 4.



**CR-15 - Resources and Investments 91.520(a)****Identify the resources made available**

Source of Funds	Source	Resources Made Available	Amount Expended During Program Year
CDBG	public - federal	\$929,771	\$363,428
Other	public - state	\$63,257	\$63,257

**Table 3 - Resources Made Available**

The FY 2019-20 allocation for CDBG was \$532,718. Approximately fifteen percent (15%) of the new allocation of CDBG funds was allocated for public service programs that provide benefits to low and moderate income persons and households. Twenty percent (20%) of the funds were allocated for planning and administration costs. The remaining funds were made available for housing, code enforcement and public facilities, which included ADA improvements.

In addition to the 2019-20 allocation, a total of \$63,678 was reprogrammed from unused funds from previous years along with a Program Income amount of \$30,000. The final total of Program Income received during the year was \$63,257. The total amount of the receipted Program Income was included in Table 3 as Resources Made Available.

In April 2020, the City received notification of additional funding in the amount of \$333,375 of CDBG-CV funding, which was provided by the CARES Act. The purpose of this funding was to provide activities that would prevent, prepare for, and respond to the COVID-19 pandemic. Of this funding, twenty percent (20%) was set aside for Program Administration. Other activities funded included the purchase of personal protection equipment, such as face masks and hand sanitizer for the homeless population, the distribution of infrared thermometers to the local business community, and the establishment of a Microenterprise Loan Program.

Due to the limitations of the Integrated and Disbursement Information System (IDIS), the funding calculated in Table 3 as follows:

**CDBG:**

- Annual Allocation \$532,718
- Reprogrammed Entitlement Funds \$63,678
- CDBG-CV \$333,375
  - **Total \$929,771**

**Other:**

- State CDBG Program Income: \$63,257



**Identify the geographic distribution and location of investments**

Target Area	Planned Percentage of Allocation	Actual Percentage of Allocation	Narrative Description
Local CDBG Target Area	32%	49%	Projects in the Local Target Area include the Code Enforcement Program and the Carlos Aguilar Field 2 Improvements

**Table 4 – Identify the geographic distribution and location of investments**

The city has one local CDBG Target Area identified in the 2019-2023 Consolidated Plan. Although it was originally planned for thirty two percent (32%) of the 2019-2020 FY allocation to be distributed to this geographic area, forty nine percent (49%) of the annual allocation was actually programmed for activities within the target area. Projects in the Local Target Area included the Code Enforcement Program and the Carlos Aguilar Field 2 Improvements Project. Additionally, work continued on the McGee Park Restroom and Snack Bar Project which was included in the 2017-18 and 2018-19 Action Plans. The percentage shown on Table 4 does not include the work at the McGee Park as this project was accounted for in calculation of funds distributed to the Target Area in previous CAPER documents.

**Leveraging**

**Explain how federal funds leveraged additional resources (private, state and local funds), including a description of how matching requirements were satisfied, as well as how any publicly owned land or property located within the jurisdiction that were used to address the needs identified in the plan.**

If there is an area where the City has been very effective, it is in the leveraging of funds. Over the years, the City has managed to leverage CDBG funds with other federal, state, and local funding sources as well as private donations. The City also applies for HOME grants for the preservation or construction of new affordable housing projects.

In 2019, the City of El Centro was successful in receiving \$5,100,000 in grant funds from the HOME Program through the State of California Department of Housing and Community Development for the construction of the El Dorado Family Apartments. In partnership with an affordable housing developer, this project will facilitate the construction of a 24-unit affordable family housing project. As part of this project, \$5,000,000 of the HOME grant proceeds and \$134,000 of HOME Program Income will be lent to the developer to assist with the financing for the project.

In a separate partnership, the City will leverage \$500,000 of Tax Allocation Bond funding from the Successor Agency of the El Centro Redevelopment Agency toward the Countryside II Apartments Project. The developer of this project received HOME grant funding in the amount of \$5,000,000 and along with other finance sources will be constructing a 56-unit affordable housing development in the City of El Centro.



City staff will continue to work closely with interested developers to identify sources of funding for the construction of new affordable multi-family housing. The types of funding that will be pursued will include tax-exempt mortgage revenue bonds, State of California Multi-Family Housing Program, and tax credits. The City has effectively partnered and plans to continue partnering with affordable housing developers and lenders to create new affordable housing units in the city. The City will also continue supporting the efforts of the Imperial Valley Housing Authority to obtain state and federal funds for the construction of affordable housing for lower income households.

The majority of the publically owned land or property the City of El Centro owns are occupied by public facilities the City uses to conduct business or to provide recreational opportunities.

There are eleven (11) properties that are owned by the now dissolved redevelopment agency. Of the eleven (11) properties owned by the redevelopment agency, four (4) are for commercial and industrial use, and seven are residential lots which can be used to provide affordable housing to low income households. All properties are listed on the Successor Agency's Long Range Property Management Plan (LRPMP), which has been approved by the State of California Department of Finance. The City's Successor Agency is actively seeking affordable housing opportunities to dispose of the residential sites included in the LRPMP as required by the California Health and Safety Code related to the disposition of formerly owned redevelopment agencies.



### CR-20 - Affordable Housing 91.520(b)

Evaluation of the jurisdiction's progress in providing affordable housing, including the number and types of families served, the number of extremely low-income, low-income, moderate-income, and middle-income persons served.

	One-Year Goal	Actual
Number of Homeless households to be provided affordable housing units	0	0
Number of Non-Homeless households to be provided affordable housing units	1	0
Number of Special-Needs households to be provided affordable housing units	0	0
<b>Total</b>	<b>1</b>	<b>0</b>

Table 5 – Number of Households

	One-Year Goal	Actual
Number of households supported through Rental Assistance	0	0
Number of households supported through The Production of New Units	0	0
Number of households supported through Rehab of Existing Units	2	0
Number of households supported through Acquisition of Existing Units	0	0
<b>Total</b>	<b>2</b>	<b>0</b>

Table 6 – Number of Households Supported

#### Discuss the difference between goals and outcomes and problems encountered in meeting these goals.

In FY 2019-20, the City addressed the “Provide Decent and Affordable Housing” Priority Need with the goal of providing affordable housing and rehabilitating existing affordable housing. The City also participates as a member of the Continuum of Care Council for the homeless to work toward the goal of providing housing to the local homeless population. The City used CDBG funds in FY 2019-20 to address its housing priorities as follows:

- Provision of Fair Housing services to 251 El Centro residents.
- The City's First Time Homebuyer Program, funded by Program Income through HELP.
- Owner-Occupied Housing Rehabilitation Program.

No CDBG funds were expended to address the housing priorities and goals identified in the plan as it relates to the First Time Homebuyer Program and Owner Occupied Housing Rehabilitation Program. In early 2020, program staff had begun evaluating eligibility of interested clients when



a State of Emergency was declared due to the COVID-19 pandemic. This resulted in the temporary closure of city facilities, as well as a moratorium on city staff meeting with clients due to concerns of safety for both the staff and clientele.

A critical factor that has impacted the City's overall achievement in the area of affordable housing is the dissolution of redevelopment in California in 2012. Without the Low/Moderate Income Housing Funds (LMIHF) as a source of leveraging, the City has limited capacity to pursue significant affordable housing projects. However, the now dissolved Redevelopment Agency did own properties that had been identified for the development of affordable housing. Staff has begun searching for qualified developers to partner in the creation of affordable housing on these sites and anticipates to have an agreement with a developer during the 2020-21 program year.

As previously mentioned, the City has partnered with developers for the construction of two separate affordable housing developments that will create 80 affordable housing units within the City.

**Discuss how these outcomes will impact future annual action plans.**

Progress has been slow in the promotion of the Housing Rehabilitation Program. However, with the easing of restrictions caused by COVID-19 toward the end of the Fiscal Year, staff will resume evaluating low-income households that have shown an interest in the program. In the upcoming program year, staff will continue marketing the program in the local English and Spanish news publications, as well as the City's social media to generate interest for participation in the program.

The FTHB Program has been stagnant since approximately 2011. Some of the contributing factors include lower market prices of housing causing less of a need for subsidy assistance, as well as a change in the City's program guidelines from a 30-year deferred loan to a 20-year amortized loan. Staff is evaluating a revision to the guidelines to add flexibilities to the program as well as a marketing plan.

**Include the number of extremely low-income, low-income, and moderate-income persons served by each activity where information on income by family size is required to determine the eligibility of the activity.**

Number of Households Served	CDBG Actual	HOME Actual
Extremely Low-income	0	0
Low-income	0	0
Moderate-income	0	0
<b>Total</b>	<b>0</b>	<b>0</b>

Table 7 – Number of Households Served



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## **CR-25 - Homeless and Other Special Needs 91.220(d, e); 91.320(d, e); 91.520(c)**

**Evaluate the jurisdiction's progress in meeting its specific objectives for reducing and ending homelessness through:**

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

The City of El Centro is part of the Imperial Valley Continuum of Care Council (hereafter referred to as "IVCCC"). The IVCCC meets once a month to discuss service delivery and assistance to be provided to homeless persons. Members of the IVCCC include public agencies, housing authorities, community based organizations, faith based organizations and private citizens representing the interest of the homeless population. The IVCCC, on an annual basis coordinates an event in the Imperial Valley known as "Project Homeless Connect". The sole purpose of the event is to outreach to homeless individuals in the Imperial Valley to connect them to services. Several agencies, including the City of El Centro participate in this annual event in efforts to reduce homelessness. At the event, homeless persons receive food, information about social services and supportive programs, personal grooming such as haircuts and warm showers, and many other case management services.

In addition, the City uses its CDBG funds to complement the IVCCC strategy. For FY 2019-20, the City expended \$8,500 towards Catholic Charities' House of Hope women's shelter. This program serves the homeless population through direct case management temporary living facilities, and referrals to other agencies or other direct assistance.

### **Addressing the emergency shelter and transitional housing needs of homeless persons**

In El Centro, there are have two emergency shelters, which have the capacity to house up to eighty seven (87) persons. The emergency shelters are operated by Catholic Charities (House of Hope) and the Center for Family Solutions (Womanhaven). These programs serve a limited clientele, specifically homeless and battered women and children through direct case management services, temporary living facilities, and referrals to other agencies or other direct assistance.

These agencies make every effort to work with the Imperial Valley Housing Authority and private residential landlords to procure permanent housing for their clients.

For FY 2019-20, the City expended \$8,500 toward the operation of the House of Hope shelter for the above mentioned programs. In total, six persons were served at the House of Hope shelter. For this fiscal year, Womanhaven did not receive funding.

City staff contacted the shelters to identify whether COVID-19 had an effect on their operations. The House of Hope shelter reported that since the beginning of the pandemic, there has been a reduction of clients coming into the facility for services. They believe clients are apprehensive



to come in for services due to fear of COVID-19. The facility has taken steps to enhance the safety of the facility including pre-screening of clients, a room set aside for possible quarantine, and sanitizing measures.

A representative from Womanhaven advised that COVID -19 took the shelter by surprise with no road map to address it. They found themselves in dire need of necessary training and equipment to technologically facilitate staff to serve clients via contactless methods. Clients were in need of supplies such as wipes, hand sanitizers, disinfectant sprays, soap, cleaning supplies, toilet paper etc. Clients were placed in hotels for pre-screening and assisted for hotel lodging, rent, mortgage, utilities, and cell phone to help them establish permanent housing and or maintain a safe home.

Additionally, the agency's mental health counseling services were impacted due to clients not able to come in for face-to-face sessions with a counselor. Clients were not comfortable with phone calls and zoom therefore it impacted client's wellbeing. The shelter's mental health treatment services have been trying to keep up with new ways to reach clients via telehealth and video conferencing. Face-to-face no contact practices have been extremely difficult for clients since domestic violence takes an emotional toll and clients were impacted with change and financial hardship. Many clients have a lack of technology, internet, and resources which also created hardship. There has been an added challenge of children being home from school creating a lack of privacy for clients to talk to the therapist.

**Helping low-income individuals and families avoid becoming homeless, especially extremely low-income individuals and families and those who are: likely to become homeless after 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); and, receiving assistance from public or private agencies that address housing, health, social services, employment, education, or youth needs**

As mentioned previously, the City of El Centro participates in the IVCCC's efforts in ending chronic homelessness. The IVCCC coordinates services and funding to remove people from homelessness to permanent housing. Chronically homeless persons require rehabilitation services, employment training and placement, health services, and case management services to transition from homelessness to transitional housing and then to supportive/permanent housing. Womanhaven has received funding in the past to provide rapid re-housing and in fiscal year 2019-2020, they assisted over 70 households, with a total of 137 persons. The Womanhaven Shelter did not receive funding for the 2019-2020 Fiscal Year.

To avoid homelessness, the City also encourages families who may be experiencing foreclosure to seek assistance from the City's fair housing provider, Inland Fair Housing and Mediation Board, to find ways in which they can remain in their home.

**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**

Through the Continuum of Care set up under the umbrella of the IVCCC, the City intends to prevent individuals and families who were recently homeless from becoming homeless again.

Womanhaven continues to apply for ESG funding for rapid re-housing to victims of domestic violence who find themselves homeless and in addition serves other persons who find themselves homeless for other reasons. Persons served are single individuals and single parents with children. The Imperial Valley Regional Occupational Program (IVROP) also has a program known as "Project ACE" which is directly geared to servicing the needs of youth in foster care and former foster youth, access to housing is one of the areas this program targets. In terms of preventing homelessness among veterans and their families, the IVHA offers a priority for assisted affordable housing to veterans of the Armed Forces. The IVCCC works to develop strategies to identify and serve veterans. They continue to explore funding opportunities, including advocating for rightful VA services in the Imperial County.

Another important resource the IVCCC has created is a resource guide for providers which enables any individual and families to see the services available in the community. The resource guide includes the name of the organization providing the service, location, contact information, and the type of service they provide.

It is also the City's intent to continue supporting the efforts of local nonprofit agencies such as Womanhaven and Catholic Charities to obtain funds to provide rapid re-housing assistance. These agencies provide supportive services to help individuals and families quickly secure housing and provide short-term financial and rental assistance.

One of the activities funded this year was to the Spread the Love Charity (STLC), who is a member of the local Continuum of Care, to aid them in their efforts in addressing homelessness in the City of El Centro. Due to extenuating circumstances, no reimbursement requests were submitted to the City by STLC. However, it should be noted that STLC was successful in securing grant funding in excess of \$700,000 to assist with and expand, four existing programs that address homeless prevention, rapid rehousing, street outreach to find people who have been affected by COVID, and data collection.





## **CR-30 - Public Housing 91.220(h); 91.320(j)**

### **Actions taken to address the needs of public housing**

The City of El Centro does not operate its own public housing authority. Therefore, residents of El Centro seek public housing and housing choice vouchers through the Imperial Valley Housing Authority.

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

The City of El Centro does not operate its own public housing authority.

### **Actions taken to provide assistance to troubled PHAs**

The City of El Centro does not operate its own public housing authority.



## **CR-35 - Other Actions 91.220(j)-(k); 91.320(i)-(j)**

**Actions taken 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. 91.220 (j); 91.320 (i)**

The City of El Centro works to remove barriers to affordable housing and the financial impact of them.\\ efforts to protect public health and safety by taking actions to reduce costs or provide off-setting financial incentives to assist in the production of safe, high quality, and affordable housing.

For FY 2019-20, the City allocated \$165,000 of CDBG funds for housing rehabilitation activities which also included the Lead Based Paint, and Asbestos Abatement Programs along with the Off-Site Improvement Program. Due to the COVID-19 pandemic and the need to limit contact with the public, staff was unable to complete any housing rehabilitations. A portion of this funding was subsequently re-allocated to a public facility improvement project.

Additionally, the City has the FTHB Program available to its residents to assist income-eligible residents in obtaining housing.

**Actions taken to address obstacles to meeting underserved needs. 91.220(k); 91.320(j)**

A major obstacle to addressing the underserved needs is the lack of adequate funding, especially for affordable housing activities. With the dissolution of redevelopment in California, and reduced state and federal funding levels, the City's ability to address the extensive needs in the community is seriously compromised.

During FY 2019-20, the City of El Centro worked with two developers toward leveraging HOME grant funds, HOME Program Income, and Tax Allocation Bond funding toward the development of two affordable housing projects. These developments will provide much needed housing and aid the City in attaining the goals set out in the Regional Housing Needs Assessment (RHNA). Per the SCAG RHNA's allocation for the City of El Centro in the planning period of 2013-21, the City needs to accommodate the creation of 487 housing units for very low income households and 300 for low income households.

**Actions taken to reduce lead-based paint hazards. 91.220(k); 91.320(j)**

As part of the inspection process for the Housing Rehabilitation and FTHB Programs for residences built prior to 1978, the City requires inspections for the potential presence of lead-based paint and the potential hazard such paint may pose to occupants of the residence. If the inspection reveals that a potential hazard exists, the City requires full testing, mitigation, and



removal of the lead-based paint hazard in accordance with HUD regulations. CDBG funds are provided as a grant for the testing and abatement of lead-based paint hazards through the Housing Rehabilitation Program.

### **Actions taken to reduce the number of poverty-level families. 91.220(k); 91.320(j)**

In an effort to reduce the number of households in poverty, El Centro will continue to support the use of existing county job training and social service programs to enhance employment marketability, household income, and housing options. In addition, the City participates in various county-sponsored programs by providing City Hall as a worksite, providing temporary positions with supervision, training, and performance evaluations to indicate their degree of success.

As part of the CDBG-CV funding allocation received, the City established a Microenterprise Loan Program which will provide loans up to \$10,000 to income-qualified micro businesses. In an attempt to keep people employed in light of the COVID-19 pandemic, the loans will be forgivable if the business retains at least one full-time (or equivalent part-time) job for six months.

The City also applied for \$550,000 of CARES Act funding from the Department of Commerce's Economic Development Administration to supplement the City's Revolving Loan Fund Program. The funding will alleviate sudden and severe economic dislocation caused by the coronavirus (COVID-19) pandemic, to provide permanent resources to support economic resiliency, and to further the long-term economic adjustment objectives of the City of El Centro and Imperial County.

### **Actions taken to develop institutional structure. 91.220(k); 91.320(j)**

In FY 2019-20, the City allocated \$84,408 of CDBG funding toward Public Services during Annual Action Plan process, which included services for Fair Housing, homeless, domestic shelter, meals for homebound seniors, and at-risk youth. In addition, the City proactively pursued funding at the local, State and Federal levels to leverage CDBG funds.

Additionally, \$66,700 of CDBG-CV funds were allocated toward Public Services to address COVID-19 by funding activities to provide personal protection equipment to the homeless and provide thermometers to local businesses to aid in re-opening businesses in a safe manner.

### **Actions taken to enhance coordination between public and private housing and social service agencies. 91.220(k); 91.320(j)**

The City maintains a list of interested potential applicants for the CDBG Annual Action Plan Request for Proposals (RFP) process. A letter announcing the availability of funds along with the RFP application is mailed to these interested agencies annually. In addition, notices are published in our local English and Spanish newspapers and on the City's website. Applications for public services and public facilities projects are accepted after notification for a minimum of a



30-day availability period. In addition, staff conducts two public meetings to provide technical assistance to interested citizens and agencies in understanding and applying for El Centro's CDBG funds.

Additionally, during the preparation of the Analysis of Impediments to Fair Housing Choice, information was obtained through residential surveys, and consultation with a Fair Housing Advisory Council which included representatives of various agencies including the Imperial County Transportation Commission, Imperial Valley Housing Authority, Imperial county Association of Realtors, California Rural Legal Assistance, Inland Fair Housing and Mediation Board, an affordable housing developer, and an independent living center.

**Identify actions taken to overcome the effects of any impediments identified in the jurisdictions analysis of impediments to fair housing choice. 91.520(a)**

The City of El Centro's 2019-2024 Analysis of Impediments to Fair Housing Choice and Fair Housing Action Plan (AI) was completed and accepted in June 2019. The 2019-2024 AI presents a comprehensive review of the demographic profile of El Centro and Imperial County, assesses the extent of housing needs among specific income groups and evaluates the range of available housing choices for residents. The AI also analyzes the conditions in the private market and public sector that may limit the range of housing choices or impede a person's access to housing.

Most importantly, the AI identifies impediments that may prevent equal housing access and develops solutions to mitigate or remove them. The AI lists specific impediments, the conclusions of the actions taken by the City to overcome the effects of those impediments, as well as recommended actions.

To aid in addressing the impediments to Fair Housing Choice, the City contracts with the Inland Fair Housing and Mediation Board to provide Fair Housing Services which include:

- Processing of Housing Inquiries
- Complaint Investigation and Referral
- Public Education and Outreach on Fair Housing
- Reporting

During the preparation of the AI the following areas were evaluated to identify public sector fair housing impediments.

- **Policies and practices of the Imperial Valley Housing Authority**  
**AI Conclusion and recommendation:** A detailed review of its policies and practices demonstrate that the IVHA affirmatively furthers fair housing choice.  
**Evaluation for FY 2019-2020:** As recommended, the IVHA continues to actively encourage families to seek housing in neighborhoods with low concentrations of low-income families. To date, the Housing Choice Voucher Program Guide for Landlords &



Owners has not been supplemented with information on property management practices that affirmatively further fair housing as recommended in the AI. The City will continue encourage the IVHA to supplement the information in their program guide.

- **Transit services provide to affordable housing developments and major employers by the Imperial Valley Transit**

**AI Conclusion and recommendation:** Within the current AI, it was determined that the Imperial Valley Transit (IVT) provides regularly scheduled, economical, bus service to all affordable housing development and all major employment centers except for rural Ross Road. As such it was concluded that services provided by IVT are comprehensive and do not create an impediment to fair housing.

**Evaluation for FY 2019-2020:** The City worked with various developers in their attempt to secure Infill Infrastructure Grant funds to assist with affordable housing developments. As part of this application process a thorough review was done to identify, among other items, the availability of local transit and transportation for the proposed developments. The City will continue to work with developers to promote affordable housing developments in close vicinity to public transit services.

- **Dispersal or concentration of group homes housing**

**AI Conclusion and recommendation:** The AI process determined that no overconcentration of group homes exists. The City will continue its practice of annually determining the number and location of licensed group homes. If an overconcentration appears to be emerging, the City will contact the California Department of Social Services, Community Care Licensing Division to implement measures that would avoid over concentration.

**Evaluation for FY 2019-2020:** During the 2019-2020 fiscal year, the City received information on one proposed group home. However, the location of facility did not lead to an overconcentration of group homes.

- **City of El Centro Planning, Zoning, and Building Policies and Practices**

**AI Conclusion:** An analysis was conducted that was organized into five categories including Housing for Disabled People, Housing for Special Needs Populations, Affordable Housing Policies Accessible Housing and Parking, and Other Fair Housing Policies. The completed analysis demonstrates that El Centro's practices are consistent with fair housing laws and affirmatively further fair housing.

**Evaluation of FY 2019-2020:** The City was awarded grant funding from the State of California Sustainable Communities Grant program to update the Land Use and Mobility (Circulation) Elements of the General Plan and prepare an Environmental Justice Element. Staff from the Community Development Department are actively working on the update. This update will be completed consistent with any applicable fair housing laws.

- **Housing Discrimination**

**AI Conclusion and Recommendation:** Based on past trends, 40 housing



discrimination cases may be filed with the IFHMB during the five year period between FY 2019-2020 and FY 2023-2024. During the same period, it is estimated that five housing discrimination cases would be filed with HUD while two to five could be filed with the California Department of Fair Employment and Housing (DFEH). With respect to the fair housing impediment of housing discrimination, the following actions will be taken

- The City will continue to offer to its residents fair housing services, which will include the processing of housing discrimination complaints and landlord/tenant counseling services. Sometimes a landlord/tenant issue has as its basis a housing discrimination concern.
- Efforts will be made to increase community awareness of the IFHMB services through postings on the City's web pages, publication of newspaper display ads, and Community Newsletter articles. A greater community awareness of Inland may result in a higher number of families expressing their right to file a housing discrimination complaint.

**Evaluation of FY 2019-2020:** The City of El Centro continues to provide information on IFHMB's services on City web pages. In reaction to the ongoing pandemic, the City of El Centro has included a COVID-19 Resources link on the home page of the City's website. A link to the IFHMB is provided on the City's COVID-19 resources webpage.

During the fiscal year 2019-2020, Inland Fair Housing and Mediation Board (IFHMB) conducted two fair housing workshops in English and Spanish to the community. A total of nine attendees received fair housing and landlord/tenant education. The fair housing workshops provided information on the Federal and State laws with an emphasis on the reasonable accommodation process, criminal history background requirements, and sex discrimination. Additional topics discussed at the workshop include notices, rent increases, and evictions. Repairs were also covered along with the process of returning security deposits, and information on the tenant protection act AB-1482.

IFHMB also conducted a virtual fair housing training with an emphasis on sex discrimination and domestic violence. The event was promoted via Eventbrite and blitzed to over 2,300 contacts throughout IFHMB's service area.

- **Brokerage Services**

**AI Conclusion and Recommendation:** As no private sector impediment was found to exist, no recommendations are necessary concerning brokerage services. Although no impediments were found concerning brokerage services, the City will request that the Imperial County Association of REALTORS accomplish the following:

- Revise the Resources tab on its website to:
  - Add a Fair Housing Information button (e.g. include information on steering, link to the Inland Fair Housing and Mediation Board, etc.)
  - Add information to the current insurance button such as the value of a C.L.U.E. Report (Comprehensive Loss Underwriting Exchange) when purchasing a home.
- Enlist the services of Inland to offer a 3-hour Fair Housing course. Every four



years, when renewing their license, all brokers and sales persons are required to complete a course on fair housing. Currently, most renewals are accomplished through online courses.

**Evaluation of FY 2019-2020:** To date, the ICAOR has not revised their resources tab to include a Fair Housing link or information on the value of a C.L.U.E. Report. Although the City cannot dictate what information this agency provides on its website, the City will continue to request the changes be made by demonstrating the advantages of providing for a well-informed client base.

The City of El Centro will be working with the IFHMB to offer a Fair Housing course to brokers through the ICAOR.

- **Steering**

**AI Conclusion and Recommendation:** It is not known with certainty if steering is an impediment to fair housing choice in El Centro. However, HUD statistics shows it is not a major issue. However, during the five-year period from FY 2019-2020 through FY 2023-2024, the City's fair housing provider, Inland Fair Housing & Mediation Board, will:

- Offer as part of its home buyer counseling services examples of how to detect "steering" during the home search process and how to detect "loan steering."
- Provide information to renters attending workshops on how to detect steering behavior by resident property managers.
- Continue to include "steering" as category of alleged housing discriminatory acts.

**Evaluation of FY 2019-2020:** The City of El Centro is working with the IFHMB to ensure that dissemination of this type of information is included in their counseling and workshop opportunities.

- **Appraisal Practices**

**AI Conclusion and Recommendation:** Complaints regarding discriminatory appraisal practices are not routinely collected by local, State or Federal agencies. Would-be homebuyers are in the best position to detect potentially discriminatory practices. However, it is unknown if the lack of consumer knowledge of the scope and meaning of appraisal reports is an impediment to fair housing choice in El Centro. The following action will be taken:

- Inland will continue to offer homebuyer counseling services in order to 1) inform borrowers of their right to request the appraisal report and 2) provide information on the contents of the report and how to detect possible discriminatory practices.

**Evaluation of FY 2019-2020:** As per the recommendation, Inland will continue to offer the described homebuyer counseling services.

- **Mortgage Lending Practices**

**AI Conclusion and Recommendation:** The City's goal is to improve the loan approval rates of all racial and ethnic populations that want to buy a home located in El Centro. To improve even further the loan approval rates, borrowers can be helped to understand the loan approval process before they submit a loan application. To address possible





impediments, the Inland Fair Housing and Mediation Board will:

- Continue to offer first-time buyer seminars to explain to borrowers the need to lower debt-to-income ratios to a level acceptable to lenders. Implementation of this recommended action should result in better prepared borrowers and cause an increase in loan approval rates of all loan applicants, regardless of race or ethnicity.
- Work with the lenders to determine why a few census tracts have high loan denial rates in order to gather information that could assist would-be homebuyers to increase the probability of garnering loan approval for homes in neighborhoods of their choice.

Per the requirements of AB 686, the city will prepare an Assessment of Fair Housing (AFH) as part of its Housing Element Update which is due for adoption no later than October 2021. During the preparation of the AFH, the City will conduct a multi-year analysis of loan denial rates to determine with more preciseness the degree to which lending discrimination exists in El Centro.

**Evaluation of FY 2019-2020:** The City of El Centro is working with IFHMB to ensure that these services are covered by their current service contract. If not included, the contract will be amended to incorporate the services.

- **Homeowners Insurance**

**AI Conclusion and Recommendation:** Evidence is unavailable on whether homebuyers in escrow who are seeking homeowner’s insurance are discriminated against because of their race, color, disability or other protected characteristics. However, without adequate knowledge would be homebuyers could pay more that they need for appropriate insurance coverage. The lack of consumer awareness of the nature of homeowners insurance may impede fair housing choice. The following actions will continue to be taken:

- Inland will continue to explain “homeowners insurance” and “C.L.U.E. Reports” during its homebuyer counseling services.

**Evaluation of FY 2019-2020:** As recommended, IFHMB will continue to provide information on homeowner’s insurance and C.L.U.E. Reports.

- **Blockbusting/Panic Selling**

**AI Conclusion and Recommendation:** There is no evidence to indicate that blockbusting/panic selling has occurred in El Centro in recent years. Consequently, there are no actions recommended for future implementation.

**Evaluation of FY 2019-2020:** No actions taken.

- **Property Management Practices**

**AI Conclusion and Recommendation:** The survey results revealed that impediments to fair housing exist in El Centro. Therefore, subject to funding availability, the City will implement the following actions:





- Invite the apartment managers to one or more workshops; the topics could include:
  - Fair housing laws in general
  - Fair housing laws regarding occupancy limits
  - Fair housing laws regarding reasonable accommodations and modifications
  - Sample written policies regarding service and companion animals

**Evaluation of FY 2019-2020:** The City of El Centro is working with IFHMB to ensure that this service is incorporated into their Professional Services Agreement.

- **Discriminatory Advertising**

**AI Conclusion and Recommendation:** Ads containing discriminatory words or phrases are infrequently unpublished. However, ads with discriminatory words or phrases may be published in the future. Additionally, ads stating “no pets” may discourage disabled persons from applying for the apartment housing advertised in print publications. The city will accomplish the following actions:

- Ensure, if funding is available, that Inland accomplishes the following:
  - Annually review ads published in newspapers on-line apartment search sites, and craigslist. Ads with discriminatory words or phrases should be investigated in more detail with follow-up enforcement actions, if necessary.
- Encourage the Imperial Valley Press to publish a concise “no pets” notice that indicates rental housing owners must provide reasonable accommodations for “service animals” and “companion animals” for disabled persons.

**Evaluation of FY 2019-2020:** As funding is available, the IFHMB will review ads for local housing opportunities for discriminatory words or phrases and investigate. Imperial Valley Press will be contacted regarding the “no pets” notice; however, it should be noted that due to the availability of free on-line advertising opportunities for local rental agencies, there are minimal, if any, advertisements in the Imperial Valley Press.

- **Hate Crimes**

**AI Conclusion and Recommendation:** No actions are recommended as no hate crimes have been reported in El Centro in recent years.

**Evaluation of FY 2019-2020:**

The City will continue to work closely with its Police Department to identify hate crimes at residential locations

- **Population Diversity**

**AI Conclusion and Recommendation:** Since 1990 the Dissimilarity Index trend line for the Region has been higher than that of the City of El Centro. No actions are necessary as the City’s Dissimilarity Index is in either the Low or Moderate range.

**Evaluation of FY 2019-2020:** No action taken.



- **Location of Affordable Housing**

**AI Conclusion and Recommendation:** The Imperial Valley Housing Authority will continue to seek Section 8 rental housing opportunities outside census tracts with a high percentage of the populations having incomes below the poverty level. The City has transmitted to the IVHA the most recent data on poverty incomes at the census tract level. For the most part, the location of El Centro's affordable housing stock is well disbursed. While most affordable housing developments are located in low and moderate income neighborhoods, only one has contributed significantly to the low- and moderate-income percentage of the neighborhood in which it is located.

**Evaluation of FY 2019-2020:** As previously mentioned, the City has partnered with a developer for the construction of a new affordable housing development. Although this development is located adjacent to an apartment complex with affordable housing units, it is also located across the street from a new, larger apartment development that is considered to be "luxury" apartments with no affordability restrictions.

It is evident that the provision of Fair Housing Services is critical in addressing the impediments to fair housing choice. During the 2019-2020 year, IFHMB continued to provide invaluable services to the local community. Below is an example of actions taken by IFHMB during the fiscal year 2019-2020.

- Conducted two fair housing workshops in English and Spanish to the community. A total of nine attendees received fair housing and landlord/tenant education. The fair housing workshops provided information on the Federal and State laws with an emphasis on the reasonable accommodation process, criminal history background requirements, and sex discrimination. Additional topics discussed were notices, rent increases, and evictions. Repairs were also covered along with the process of returning security deposits, and information on the tenant protection act AB-1482.
- Conducted a virtual fair housing training with an emphasis on sex discrimination and domestic violence. The event was promoted via Eventbrite and blitzed to over 2,300 contacts throughout IFHMB's service area.
- In April 2020, IFHMB electronically distributed a fair housing newsletter recognizing April as Fair Housing Month. The fair housing newsletter was blitzed to over 2,300 persons.
- Attended the collaborative meetings held by the Imperial Valley Continuum of Care Council (IVCCC) monthly meetings.
- Distributed over 800 pieces of fair housing flyers in English and Spanish throughout the City of El Centro.
- Promoted services via social media and public service announcements. IFHMB has posted updated information with resources on the agency's website related to COVID-19. As part of our ongoing marketing efforts, IFHMB also utilizes an online advertising service developed by Google. The service is called "Google AdWords." This marketing platform is used to drive online users who are seeking assistance to IFHMB's website for additional information on programs and services. IFHMB also uses Eventbrite, MailChimp, Facebook, and Twitter to promote workshops and events.



- Opened seven (7) fair housing complaints. Four (4) fair housing complaints were related to disability discrimination, one (1) race, one (1) source of income, and one (1) arbitrary fair housing complaint. Of the seven (7) fair housing complaints received, one (1) race complaint was referred to HUD, one (1) disability complaint was referred to IFHMB's agency's fair housing initiative program (FHIP) for further investigation. The remaining three (3) fair housing complaints were based on disability, one (1) arbitrary, and one (1) source of income. These fair housing complaints were provided with education and information on fair housing.
- Received 71 landlord/tenant complaints during this time period. Twenty-nine (29) were related to evictions, twenty-one (21) were related to rights and responsibilities, fourteen (14) were related repairs, four (4) were related to rent increase, two (2) were related to security deposit, and one (1) was related to neighbor dispute.
- During the month of April 2020, IFHMB saw a 66% increase in calls related to COVID -19. The calls received were related to evictions, notices and tenant rights. IFHMB provided information related to Executive orders, moratoriums and other tenant rights. No other significant increases have been seen since then.



## **CR-40 - Monitoring 91.220 and 91.230**

### **Describe the standards and procedures used to monitor activities carried out in furtherance of the plan and used to ensure long-term compliance with requirements of the programs involved, including minority business outreach and the comprehensive planning requirements**

All proposed projects and subrecipient applicants are evaluated as part of the pre-award assessment. Technical assistance is provided and on-site monitoring is conducted for all subrecipients or whenever a subrecipient is showing signs of compliance issues. Desk reviews are performed continually as follows: Performance reports are reviewed monthly for progress and performance of activities. Additionally, invoices are reviewed in detail for appropriate documentation of services rendered, allowability of costs, and proof of payment. It is the City's policy that reimbursements are withheld from subrecipients whenever reports are late and until any outstanding compliance issues are resolved.

All housing rehabilitation and FTHB loan recipients are monitored on an annual basis for compliance with owner-occupancy requirements. An annual certification is sent for execution along with a request for supporting occupancy documentation, which is then placed in the borrower's loan file. Due to the COVID-19 pandemic, the annual certification process was postponed as the City offices were closed during the timeframe that this process normally takes place. Although the City does provide a stamped, self-addressed envelope for return of the certification documentation, an overwhelming majority of the program's clients submit the documentation in person. The certification process resumed as the COVID-19 infection rate for the County of Imperial began to decline. Steps were taken to sanitize work space and documentation to promote the safety of both staff and the clientele.

Outreach to minority and women-owned businesses is conducted as part of the City's housing programs. The contractor's list is open to all licensed contractors subject to insurance requirements and verification of their lack of placement on the Federal publication that lists debarred, suspended, and ineligible contractors. This list is updated on an annual basis. The list of participating lenders is also open to all, subject to execution of a contract with the City.

The City is cognizant of the prohibition of administering the CDBG Program in such a way as to limit access on the basis of race, color, and national origin. Additionally, steps were taken to identify under-representation of protected groups. All activities undertaken are required to report on a monthly basis the breakdown of demographic information on their clientele served. Detailed information is provided in IDIS Reports-PR 23: CDBG Summary of Accomplishments which is included in Attachment 4. Collectively, the following represents the under-represented populations served.



<b>Under-served Population</b>	<b>CDBG Actual</b>
Female Head of Household	67
Elderly	88
Disabled	37
Homeless	44

**Table 8: Summary of Under-Served Population**

The City also funded an activity administered by the Imperial County LGBT Resource Center. This agency provides services such as HIV testing, mental health support groups as well as referrals to the local Behavioral Health Department, LGBTQIA engagement, family counseling, domestic violence counseling.

**Citizen Participation Plan 91.105(d); 91.115(d)**

**Describe the efforts to provide citizens with reasonable notice and an opportunity to comment on performance reports.**

A Notice of Public Review and Comment Period was published in the Adelante Spanish paper on October 30, 2020, and the Imperial Valley Press on November 1, 2020, giving notice that the CAPER would be available for a 15-day review and comment period. As part of this notification, the public was advised that accommodations could be made upon request for any member of the public with hearing impairment or physical disability. The 15-day period began on November 18, 2020 and concluded on December 2, 2020. The draft CAPER document was made available to the public at the City Clerk's Office, the Public Library, and the Economic Development Division's office during normal business hours. It was also be also posted on the City's website. This document is generally provided for review at the City's Community Center; however, the facility is still closed to the public due to COVID-19 during the public review period.



## **CR-45 - CDBG 91.520(c)**

**Specify the nature of, and reasons for, any changes in the jurisdiction's program objectives and indications of how the jurisdiction would change its programs as a result of its experiences.**

Staff is evaluating how to increase participation in the Housing Rehabilitation Program and FTHB Program and will continue to pursue an aggressive marketing and awareness campaign to its residents.

Staff will pursue educating project managers and applicants of the importance of readiness and timely expenditures. Technical assistance will continue to be made available upon request as part of the program project outreach.

**Does this Jurisdiction have any open Brownfields Economic Development Initiative (BEDI) grants?**

No

**[BEDI grantees] Describe accomplishments and program outcomes during the last year.**



## **ATTACHMENT 1**

# **Certification of Publication**



## **ATTACHMENT 2**

# **Approving Resolution**





## **ATTACHMENT 3**

# **IDIS Reports**