

CR-05 - Goals and Outcomes

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

This could be an overview that includes major initiatives and highlights that were proposed and executed throughout the program year.

The Department of Community Services (DCS) administers housing and community development programs in New Castle County (NCC). During the County's 2018 program year \$5,111,837.35 was expended on housing and community development programs. Community Development Block Grant (CDBG) funds were used for a variety of County in-house and sub-recipient projects for Housing Rehabilitation, First Time Homebuyer Downpayment and Settlement Loans, Rental Housing Rehabilitation, Community Policing, Homelessness Prevention, Domestic Violence Prevention, Architectural Accessibility Improvements, Neighborhood Cleanups and Employment and Training programs.

In addition, the DCS operates the New Castle County Housing Authority (NCCHA) which administers the rental subsidy Housing Choice Voucher (HCV) program.

HOME Investments Partnerships Program (HOME) funds were used by sub-recipients for rental housing rehabilitation, group home renovations, shelter operations and affordable homeownership.

Loan paybacks from non-federal supplemented CDBG used for County-wide Downpayment and Settlement Assistance Loans. State funding is available to supplement federal housing rehabilitation loans. Emergency Solutions Grant (ESG) funding was used to support homeless agencies and administer Rapid Re-Housing Programs.

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
Create Expanded Economic Opportunities	Non-Housing Community Development	CDBG: \$	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	2249	5725	254.56%	1004	1060	105.58%
Create Expanded Economic Opportunities	Non-Housing Community Development	CDBG: \$	Public service activities for Low/Moderate Income Housing Benefit	Households Assisted	0	0				
Provide Decent Affordable Housing for Owners	Affordable Housing Decent Housing	CDBG: \$ / HOME: \$	Rental units rehabilitated	Household Housing Unit	0	0		0	0	
Provide Decent Affordable Housing for Owners	Affordable Housing Decent Housing	CDBG: \$ / HOME: \$	Homeowner Housing Added	Household Housing Unit	10	3	30.00%	8	6	75.00%
Provide Decent Affordable Housing for Owners	Affordable Housing Decent Housing	CDBG: \$ / HOME: \$	Homeowner Housing Rehabilitated	Household Housing Unit	140	193	137.86%	125	51	40.80%

Provide Decent Affordable Housing for Owners	Affordable Housing Decent Housing	CDBG: \$ / HOME: \$	Direct Financial Assistance to Homebuyers	Households Assisted	68	216	317.65%	65	61	93.85%
Provide Decent Affordable Rental Housing	Affordable Housing Supportive Housing	HOME: \$ / ESG: \$	Rental units constructed	Household Housing Unit	12	0	0.00%			
Provide Decent Affordable Rental Housing	Affordable Housing Supportive Housing	HOME: \$ / ESG: \$	Rental units rehabilitated	Household Housing Unit	23	134	582.61%	30	29	96.67%
Provide Decent Affordable Rental Housing	Affordable Housing Supportive Housing	HOME: \$ / ESG: \$	Homeowner Housing Rehabilitated	Household Housing Unit	0	6				
Provide Decent Affordable Rental Housing	Affordable Housing Supportive Housing	HOME: \$ / ESG: \$	Housing for Homeless added	Household Housing Unit	0	0				
Provide Decent Affordable Rental Housing	Affordable Housing Supportive Housing	HOME: \$ / ESG: \$	Housing for People with HIV/AIDS added	Household Housing Unit	0	0				

Provide Decent Housing via Homelessness Assistance	Homeless	CDBG: \$ / ESG: \$	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	57	74	129.82%	14	7	50.00%
Provide Decent Housing via Homelessness Assistance	Homeless	CDBG: \$ / ESG: \$	Tenant-based rental assistance / Rapid Rehousing	Households Assisted	43	49	113.95%			
Provide Decent Housing via Homelessness Assistance	Homeless	CDBG: \$ / ESG: \$	Homeless Person Overnight Shelter	Persons Assisted	8	98	1,225.00%			
Provide Decent Housing via Homelessness Assistance	Homeless	CDBG: \$ / ESG: \$	Overnight/Emergency Shelter/Transitional Housing Beds added	Beds	0	0				
Provide Decent Housing via Homelessness Assistance	Homeless	CDBG: \$ / ESG: \$	Homelessness Prevention	Persons Assisted	124	175	141.13%	69	292	423.19%
Provide Decent Housing via Homelessness Assistance	Homeless	CDBG: \$ / ESG: \$	Other	Other	0	0				

Provide Suitable Living Environments	Non-Homeless Special Needs Non-Housing Community Development	CDBG: \$	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	Persons Assisted	1955	6325	323.53%			
Provide Suitable Living Environments	Non-Homeless Special Needs Non-Housing Community Development	CDBG: \$	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	926	24437	2,638.98%	235	6717	2,858.30%
Provide Suitable Living Environments	Non-Homeless Special Needs Non-Housing Community Development	CDBG: \$	Public service activities for Low/Moderate Income Housing Benefit	Households Assisted		0				
Provide Suitable Living Environments	Non-Homeless Special Needs Non-Housing Community Development	CDBG: \$	Homeless Person Overnight Shelter	Persons Assisted		3				
Provide Suitable Living Environments	Non-Homeless Special Needs Non-Housing Community Development	CDBG: \$	Homelessness Prevention	Persons Assisted		30				

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 County exceeded majority of the Annual Goals outlined in the 2015-2020 Consolidated Plan through various public service housing and public facility activities. To provide Decent Affordable Housing for owners, the County met 94% of its goal and provided direct financial assistance to homebuyers through the Downpayment and Settlement Loans Program. During the program year, the County and City of Newark assisted 112 households using housing related CDBG funding. Sixty-one households in New Castle County received downpayment settlement assistance and a total of 41 households received housing rehabilitation and related services. Those programs include: Two Homebuyer Incentive Program (HIP) Loans, two Housing Rehabilitation Direct Program Loans, 21 Emergency Repair Loans, 11 Senior Minor Home Repair Grants, and five Architectural Accessibility Improvements. In addition, The City of Newark completed four Home Improvement projects and six Senior Repair projects for residents located within the City of Newark limits.

There were several HOME projects nearing completion when the CAPER was being drafted this year. A total of 35 HOME units were completed in Program Year 2018 which consisted of 29 rental units and 6 Homebuyer units.

According to the IDIS PR 51-Selected CDBG Accomplishment Report for the Program Year between 7/1/2018 – 6/30/2019, NCC assisted 112 households with housing related services, 34,799 people were recipients of Public Services and 1,955 people benefitted from Public Improvements. Overall, a total of 36,866 people were beneficiaries of NCC’s CDBG programs for program year 2018. These were projects that provided direct homeownership assistance, residential rehabilitation, curb cuts for Americans with Disabilities Act (ADA) compliance, direct client services and ones that were based on Low/Mod Geographic Area Benefit Census Data, and include activities such as general public services, senior services, handicapped services, crime awareness projects, fair housing activities, subsistence payments, employment & training programs, and youth services, to name a few.

ESG Strategic Plan goals were achieved through collaborative initiatives between NCC and non-profit homeless service providers that operate and maintain Emergency Shelters, Rapid Re-Housing programs and Homeless Data Collection Systems. ESG accomplishment data is downloaded from the SAGE (Homeless Management Information System) HMIS Reporting Repository. A total of 709 unduplicated clients, representing 372 households, were served during this program year.

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)

	CDBG	HOME	ESG
White	600	25	0
Black or African American	1,016	10	0
Asian	41	0	0
American Indian or American Native	6	0	0
Native Hawaiian or Other Pacific Islander	83	0	0
Total	1,746	35	0
Hispanic	188	5	0
Not Hispanic	1,608	30	0

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

Narrative

NCC assisted many persons through a variety of housing and public service projects utilizing CDBG, HOME and ESG program funds. The table above reflects the beneficiary data for families assisted during the program year July 1, 2018– June 30, 2019 where race and ethnicity information was required. NCC documents the race and ethnicity of families served in their jurisdiction where race, ethnicity and income must be collected. According to NCC’s internal records, a total of 1,831 people were assisted. The internal spreadsheet maintained by NCC is included as an attachment. Race and ethnicity data of persons served with ESG funding is included SAGE HMIS Reporting Repository reports. NCC compiled the SAGE HMIS Race and Ethnicity data derived from Q12a & Q12b of each sub-recipient agency’s report and has included it as an attachment.

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	3,583,041.60	3,465,203.62
HOME	public - federal	2,821,591	1,473,019
ESG	public - federal	187,215	173,615

Table 3 - Resources Made Available

Narrative

The data in this chart derived from the IDIS PR 26 CBDG Financial Summary Reports (see attachment) and the PR 91 ESG Expenditure Report. The CBDG resources made available include the HUD Entitlement Grant, unexpended CBDG funds at the end of the previous program year, and Program Income. We utilized our internal Expenditure Financial Analysis Inquiry system to obtain HOME available resources data and expenditures incurred by NCC.

Identify the geographic distribution and location of investments

Target Area	Planned Percentage of Allocation	Actual Percentage of Allocation	Narrative Description
BLUEPRINT COMMUNITY / EDGEMOOR			
CENSUS TRACTS 154, 155, 156			
City of Newark Cooperating Community- City of Newark Limits	12		Cooperating Community
County-Wide	88		
Dunleith-Census Tract 156			
HIP CENSUS TRACTS (36 OF 99 COUNTY CTS)			
Low and Moderate Income Areas (LMA)- Census Tracts FY 2014 LMISD- 2006-2010 ACS			Local Target Area

Table 4 – Identify the geographic distribution and location of investments

Narrative

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.

Fiscal Year Summary – HOME Match	
1. Excess match from prior Federal fiscal year	101,082,877
2. Match contributed during current Federal fiscal year	16,261,157
3. Total match available for current Federal fiscal year (Line 1 plus Line 2)	117,344,034
4. Match liability for current Federal fiscal year	213,957
5. Excess match carried over to next Federal fiscal year (Line 3 minus Line 4)	117,130,077

Table 5 – Fiscal Year Summary - HOME Match Report

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Match Contribution for the Federal Fiscal Year								
Project No. or Other ID	Date of Contribution	Cash (non-Federal sources)	Foregone Taxes, Fees, Charges	Appraised Land/Real Property	Required Infrastructure	Site Preparation, Construction Materials, Donated labor	Bond Financing	Total Match
Arc of Delaware #2320	07/01/2018	37,000	0	0	0	0	0	37,000
Connections Community Support #2321	07/01/2018	950,000	0	0	0	0	0	950,000
Habitat for Humanity-Elizabeth Street #2060	07/01/2018	374,687	0	0	0	0	0	374,687
Interfaith Community Housing of Delaware #2324	07/01/2018	785,620	0	0	0	0	0	785,620
Our Lady of Grace #2322	07/01/2018	14,113,850	0	0	0	0	0	14,113,850

Table 6 – Match Contribution for the Federal Fiscal Year

HOME MBE/WBE report

Program Income – Enter the program amounts for the reporting period				
Balance on hand at begin-ning of reporting period \$	Amount received during reporting period \$	Total amount expended during reporting period \$	Amount expended for TBRA \$	Balance on hand at end of reporting period \$
0	0	0	0	0

Table 7 – Program Income

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Minority Business Enterprises and Women Business Enterprises – Indicate the number and dollar value of contracts for HOME projects completed during the reporting period						
	Total	Minority Business Enterprises				White Non-Hispanic
		Alaskan Native or American Indian	Asian or Pacific Islander	Black Non-Hispanic	Hispanic	
Contracts						
Dollar Amount	0	0	0	0	0	0
Number	0	0	0	0	0	0
Sub-Contracts						
Number	0	0	0	0	0	0
Dollar Amount	0	0	0	0	0	0
	Total	Women Business Enterprises	Male			
Contracts						
Dollar Amount	0	0	0			
Number	0	0	0			
Sub-Contracts						
Number	0	0	0			
Dollar Amount	0	0	0			

Table 8 - Minority Business and Women Business Enterprises

Minority Owners of Rental Property – Indicate the number of HOME assisted rental property owners and the total amount of HOME funds in these rental properties assisted						
	Total	Minority Property Owners				White Non-Hispanic
		Alaskan Native or American Indian	Asian or Pacific Islander	Black Non-Hispanic	Hispanic	
Number	0	0	0	0	0	0
Dollar Amount	0	0	0	0	0	0

Table 9 – Minority Owners of Rental Property

Relocation and Real Property Acquisition – Indicate the number of persons displaced, the cost of relocation payments, the number of parcels acquired, and the cost of acquisition						
Parcels Acquired		0		0		
Businesses Displaced		0		0		
Nonprofit Organizations Displaced		0		0		
Households Temporarily Relocated, not Displaced		0		0		
Households Displaced	Total	Minority Property Enterprises				White Non-Hispanic
		Alaskan Native or American Indian	Asian or Pacific Islander	Black Non-Hispanic	Hispanic	
Number	0	0	0	0	0	0
Cost	0	0	0	0	0	0

Table 10 – Relocation and Real Property Acquisition

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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	8	6
Number of Special-Needs households to be provided affordable housing units	30	29
Total	38	35

Table 11 – Number of Households

	One-Year Goal	Actual
Number of households supported through Rental Assistance	69	292
Number of households supported through The Production of New Units	8	6
Number of households supported through Rehab of Existing Units	125	51
Number of households supported through Acquisition of Existing Units	2	0
Total	204	349

Table 12 – Number of Households Supported

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

The one-year-goals outlined in the CP and Annual Plan (AP) relied on the proposed beneficiary data provided by our partnering sub-recipients. In previous years, the numbers proposed by the agencies were based upon them receiving the full funding request. NCC realized this and reviewed the grant application to include proposed beneficiary data based on whole or partial funding. As a result, this year, the proposed beneficiary data and the actual beneficiaries served were more in line. NCC was able to meet or exceed the total amount of people served.

The number of households supported through rental assistance included CDBG funded projects geared toward homelessness prevention by providing subsistence payments. For the third year in a row NCC was pleased to see the actual number of persons supported through rental assistance projects surpass the one-year-goal. HOME project beneficiary data is reported once the actual project is completed in the IDIS system. There were 29 rentals and 6 first time homebuyers who were beneficiaries of HOME funds.

Discuss how these outcomes will impact future annual action plans.

NCC has seven housing priorities: Expanding the Supply of Housing for Affordable Homeownership; Expanding the Supply of Housing for Affordable Homeownership; Housing Rehabilitation for LMI Homeowners and Seniors; Increasing Homeownership Opportunities; Expanding the Supply of Rental Housing for LMI Households; Support Housing for Persons with Disabilities; Assisting Those at Risk of Becoming Homeless, and Assist Homeless Populations. NCC recognizes the need to continue supporting programs that help us address these priorities. For Program Year 2019 a little over \$4.2 million in CDBG, ESG and HOME funds combined have been allocated to programs that will continue serving the housing needs of the people in our jurisdiction. NCC strives to exceed our goals of providing safe, affordable, decent housing for our most vulnerable populations.

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	774	29
Low-income	672	5
Moderate-income	295	1
Total	1,741	35

Table 13 – Number of Households Served

Narrative Information

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

NCC partners with the Housing Alliance Delaware (HAD) and funds the NCC Delaware Community Management Information System (CMIS). All NCC ESG sub-recipients must use CMIS to report client data. The data is then compiled and analyzed by the HAD and is used as an evaluation tool to track service provider outcomes and help us develop strategies to combat homelessness in our jurisdiction.

New Castle County participates in the state-wide Continuum of Care (CoC) planning through representation on the CoC Board, where Carrie Casey is chair and the HAD Board and DICH where Nicole Waters serve as a designated voting member. NCC staff also participates in the CoC Rating and Ranking Committee for CoC funding competitions. The Committee is charged with making strategic funding recommendations to the CoC Board for final consideration and approval of approximately \$7 million dollars for services to benefit the homeless in Delaware. NCC staff participate in the annual Point-in-Time Count conducted by HAD. Point-in-Time studies provide a snapshot of homelessness on one night. The counts are done on a specific night and a national formula is used to project the number of homeless people in Delaware throughout the year. Local, State and Federal agencies and funders use the data collected through the Point-in-Time studies to complete needs assessments and determine the need for additional services focused on the homeless.

All communities receiving funding through the U.S. Department of Housing and Urban Development's (HUD) (CoC) and Emergency Solutions Grant (ESG) homeless assistance programs are required to have in place a coordinated process by which households experiencing homelessness are assessed and prioritized for homeless assistance. In Delaware, Centralized Intake was launched on January 6, 2014.

Centralized Intake is the process by which Delaware coordinated entry into the homeless response system, including access to emergency shelter as well as available resources to assist households stabilize in housing of their own. The purpose of Centralized Intake is to ensure that people have fair, equal and efficient access to homeless assistance, people with greatest needs receive priority for homeless assistance, and communities are working together to identify and resolve gaps in available services.

Centralized Intake also prioritizes households for available housing resources in the homeless assistance system. The CoC uses the Vulnerability Index Service Prioritization Decision Assessment Tool (VI-SPDAT) to help prioritize households for housing services and identify those in the most need.

Households are referred to Rapid Re-Housing (RRH-short term rental intervention) and Permanent

Supportive Housing (PSH-permanent housing for chronically homeless households that offer the option of supportive services). HAD currently employs five Centralized Intake staff members who are responsible for guiding those experiencing a housing crisis through the Centralized Intake process.

Addressing the emergency shelter and transitional housing needs of homeless persons

As a part of their contract obligation, NCC's network of emergency shelters are required to participate in the State CMIS System. The State's CoC also launched a Centralized Intake System in 2014, and has made ongoing plans to continue improvement to this system to optimize efficiency, outcomes and quality of care for consumers. All agencies that receive ESG funds are required to participate in CMIS and the Centralized Intake System.

In an effort to address the housing needs of people currently in emergency shelters or transitional housing facilities, the County uses funding from its ESG and CDBG HUD allocation. A combined total of \$206,500 was awarded to agencies who work to address the housing needs of persons in emergency shelters or transitional housing facilities. During the program year NCC allocated \$60,000 in ESG funding to emergency shelters, \$90,000 to Rapid Re-Housing activities and \$24,000 for ESG Data Collection. An additional \$32,500 in CDBG funding was awarded to transitional housing projects and for the operation of the Centralized Intake System.

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

NCC uses CDBG funding for homeless prevention projects. During the program year a total of \$105,000 was awarded to agencies that address our Housing Priority of assisting those at risk of becoming homeless.

Delaware's ESG jurisdictions have worked together and with the HPC of Delaware to identify common goals to: 1) reduce the length of time that persons are homeless; 2) reduce the return to homelessness after being permanently housed, and 3) decrease the number of persons homeless.

NCC will continue to fund agencies that provide homeless prevention and diversion services to the most vulnerable populations, listed above, which consists of extremely low-income individuals and families. In addition, New Castle County staff will continue to play an active role in ensuring all people

who experience homelessness will have access to resources and services, making the housing crisis brief and non-recurring.

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

During the program year NCC awarded \$90,000 or 48% percent of our total ESG allocation, to Rapid Re-Housing projects. As a contract requirement, agencies awarded Rapid Re-Housing funds must provide housing stability case management and meet with the client monthly to achieve self-sufficiency and reduce the risk of recidivism. NCC will continue to fund agencies that provide homeless prevention and diversion services to the most vulnerable populations. NCC staff will continue to play an active role in combatting homelessness in our state by participating in the Mayor's Challenge, CoC Board, HAD Board and any other forums related to homelessness in Delaware.

To assist those populations at risk of becoming homeless, which may include families who were recently homeless, New Castle County uses CDBG funding for homeless prevention projects. During the program year a total of \$105,000 was awarded to agencies that address our Housing Priority of assisting those at risk of becoming homeless.

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

Actions taken to address the needs of public housing

Using Small Area Fair Market Rents in Housing in the Housing Choice Voucher Program

The Small Area Fair Market Rent final rule establishes a more effective means for HCV tenants to move into areas of higher opportunity and lower poverty by providing the tenants with a subsidy adequate to make such areas accessible and, consequently, help reduce the number of voucher families that reside in areas of high poverty concentration.

This rule provides that in lieu of determining rents based on an entire metropolitan area, rents will be determined on the basis of ZIP codes for those metropolitan areas with both significant voucher concentration challenges and market conditions where establishing FMRs by ZIP code areas has the potential to significantly increase opportunities for voucher families. ZIP codes are small enough to reflect neighborhood differences and provide an easier method of comparing rents within one ZIP code to another ZIP code area within a metropolitan area. Based on early evidence from PHAs using Small Area FMRs that are in place in certain metropolitan areas in the U.S., HUD believes that Small Area FMRs are more effective in helping families move to areas of higher opportunity and lower poverty. NCCHA implemented these measures April 1, 2018 to de-concentrate poverty by expanding the supply of housing types to encourage a mixed income market of housing options in all areas of the County so that people who work in the County are able to live in the County, and recommend HCV clients to non-profit agencies i.e. Latin American Community Center, West End Neighborhood House, etc. for appropriate housing and undertake affirmative measures to ensure accessible housing to persons with all varieties of disabilities regardless of unit size required.

NCCHA has also partnered with Stand by Me Financial Empowerment Partnership to offer financial management to our current waiting list applicants. A customized referral form was mailed to all 265 remaining waiting list applicants. NCCHA's goal in partnering with Stand by Me is to offer financial management services to include debt remediation, savings and budget, counseling. NCCHA's objective is to have the applicant's become more-informed consumers which will remove some barriers to being a renter once issued a voucher. The response from the applicants has been great but unfortunately, NCCHA had no graduates this year.

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

The New Castle County Housing Authority (NCCHA) convenes a Resident Advisory Board meeting at least once each year to discuss the development of the HUD Public Housing Plan and the Consolidated Plan. The purpose of this meeting is also to discuss any issues which are of concern to current voucher holders. A copy of the annual plan is submitted to members of the Resident Advisory Board prior to a

meeting of the RAB. Once the RAB meeting is held, a separate meeting, which is open to the public, is held prior to the final approval of the plans. NCCHA also operates the Family Self-Sufficiency (FSS) Program. This program is a way for families receiving Section 8 rental assistance, achieve unmet dreams, such as higher education, full-time employment, and/or homeownership.

NCCHA does not have a duly recognized resident council. However; a resident group exists that is independent of NCCHA. This group handles all community picnics, dinners, yard sales, and other similar events. The Housing Authority assists by providing the accommodations for these community events. Furthermore, the Authority offers a Housing Choice Voucher homeownership program. In 2016, NCCHA began hosting Homeownership Briefings for qualified clients interested in becoming homeowners. The briefings offer an opportunity for the client to learn the entire home buying process. Representatives from homeownership counseling agencies, local realtors and bankers are available to explain their roles in the homebuyer process. To date, NCCHA has invited 360 clients to the briefings. A total of 280 clients have taken advantage of the opportunity and 6 clients settled on homes in FY 2019. Since 2003, at the program's inception, a total of 51 clients are proud new homeowners.

Actions taken to provide assistance to troubled PHAs

Not applicable

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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)

NCC created a Housing Trust Fund in 2007 to address the housing needs of the very low, low and moderate households in our jurisdiction. The County added an Accessory Dwelling Unit (ADU) to its zoning code in 2008 and adopted inclusionary Workforce Housing zoning as an important tool to expand the supply of affordable housing in the County. The workforce housing provisions established a voluntary mechanism by which developers could opt to set aside 20% of a project's dwelling units for housing priced for low-income and moderate-income households in exchange for density bonuses and some relief from *New Castle County Code*. This initiative uses no funding from the Federal, State or County. Workforce Housing Program was eliminated from New Castle County Code, but not before creating 534 Workforce Housing Units. In 2014, New Castle County Council approved the Traditional Neighborhood Housing Program, the first mandatory inclusionary housing program in New Castle County. The Program will create additional homeownership and rental units for low- to moderate-income residents of New Castle County by requiring rezoning in New Castle County to include a percentage of affordable units or Moderately Priced Development Units (MPDUs) in their rezoning plans.

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

An obstacle is the lack of sufficient resources to meet all underserved needs. To overcome these obstacles, NCC continuously seeks public and private resources to leverage its entitlement funds for housing programs and community development activities. Additionally, NCC's home repair and homebuyer programs are loans with anticipated program income revolving to serve a larger number of individuals and families. NCC continues to look at ways to reduce costs, streamline administrative functions, encourage partnerships and prioritize use of funds to projects that are "shovel ready" and have the greatest impact.

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

Housing rehabilitation activities conducted by New Castle County are subject to the HUD's Lead Safe Housing Rule (LSHR) requirements for assessment of lead-based paint hazards. Approximately 15 homeowner units receiving housing repair or rehabilitation assistance will be made at least temporarily lead-safe each year through interim controls or abatement. In a typical year, the County housing inspectors complete training in visual assessment and lead safe work practices. County inspectors continue to educate rehabilitation contractors and Section 8 landlords on lead paint assessment and safety.

In addition, NCC provides ESG sub-recipients with lead information from the Office of Healthy Homes and Lead Hazard Control to distribute to applicable clients and staff. The ESG Rapid Re-Housing and Shelter packets provided to the sub-recipient agencies include Lead Disclosure forms that must be signed by applicable clients. The Lead Disclosure form includes the applicable CFR, disclosure requirements, and the HUD website where additional lead information and pamphlets can be obtained. The lead form and Office of Healthy Homes and Lead Hazard Control flyer is also posted on our website.

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

Poverty is a function of income and access. Factors that affect income include education, job training, and employment. New Castle County, through the development of their AFFH, will work to abolish the factors that cause poverty. Such factors include unemployment, substance abuse issues, and lack of transportation options to get to and from work, to name a few. It is nearly impossible to estimate the potential reduction in the number of poverty level families in the County over the next five years.

In addition, the County can elect to support organizations that provide quality services to low income residents to help them improve their incomes and work to remove barriers and impediments that cause poverty.

Ultimately, federal and state policies on welfare, health care, and the minimum wage are crucial factors in the fight to address and reduce poverty. The County, through its various departments and sub-recipients, will continue to advocate for matching savings programs, education on the earned income tax credit, improved transportation alternatives, to support organizations that provide job training and placement services, to support homeless prevention activities, and to preserve and improve affordable housing options, as part of its strategy to prevent and alleviate poverty in New Castle County.

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

NCC's DCS is responsible for the administration of CDBG, HOME and ESG Programs. All sub-recipient agreements are monitored on an ongoing basis. NCC will participate with other groups in planning for the homeless with the HPC of Delaware and the other jurisdictions to address fair housing.

The Workforce Housing initiative was instituted in 2007 to address the need for adequate and affordable housing for low- and moderate-income individuals and families in NCC. The initiative is a voluntary partnership with the local construction industry. The initiative does not use Federal, State or county funding to accomplish the goal of providing Workforce Housing. However, NCC did provide in-kind funding by fee waivers and relief from NCC Code through adoption of Substitute No. 1 to Ordinance

07-150 as amended by Floor Amendment No. 1 in February 2008. NCC entered into 11 agreements with developers of Workforce Housing subdivisions. It is currently anticipated that 534 Workforce Housing units will be produced as a result. In NCC FY2019, there were 173 applications for Workforce Housing units, 91 to rent and 82 to purchase. One hundred and twenty-four (124) homeowners and 125 tenants were living in Workforce Housing units by the end of the program year. On February 3, 2015, NCC Council passed an Ordinance eliminating the workforce housing provisions contained in Chapter 40 of the NCC Code after new legislation was adopted on December 9, 2014. The existing Workforce Housing agreements that have been recorded will not be affected.

The Traditional Neighborhood Housing Program was adopted by County Council on December 9, 2014. This program is the first inclusionary housing program in New Castle County and provides a mandatory and voluntary component. All residential rezoning or variance applications for density increases proposing over 25 dwelling units will produce moderately priced dwelling units (“MPDUs”), excluding mixed use developments. Like Workforce Housing, there is no Federal, State or county funding provided. Since adoption, five (5) plans have been submitted requiring MPDUs, three (3) of which are currently inactive. The remaining plans are making their way through the Land Use process and have not advanced to the point where total units required or proposed is known. However, these MPDUs will target households below 90% and 75% Area Median Income (AMI).

ADUs are independent housing units created within single-family homes or on their lots. An ADU can provide supplementary housing that can be integrated into existing single-family neighborhoods to provide a typically lower priced housing alternative with little or negative impact on the character of the neighborhood. Furthermore, ADUs can provide homeowners with a means of obtaining, through tenants, in the ADU or the principal unit, rental income, companionship, security and services. In 2007 New Castle County implemented ADUs in all residential districts. A total of 273 ADU permits were issued to date and 15 were issued in the program year.

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

There are several organizations that will play a role in implementing the County’s Five-Year Consolidated Plan, including area non-profit housing developers, social service providers, human and homeless service providers, and Cooperating Community City of Newark. The DCS operates in-house programs, supports programs operated by other County departments, and awards funds to various housing and community development agencies. Sub-grantee agencies, primarily non-profits, provide housing and social services for specific populations, including homeless persons, senior citizens, extremely low income renters, first time homebuyers, persons with disabilities, children and youth, etc. In addition, sub-grantees also engage in housing construction and rehabilitation. Sub-grantees are chosen during each competitive, yearly funding cycle.

Area municipalities also play a role in implementing various parts of the CP. NCC maintains cooperation agreements with 12 of the 13 incorporated county villages, towns, and cities, so that programs may occur within municipal limits. The City of Wilmington is its own HUD entitlement community. When the County invests in Wilmington, it must demonstrate benefit to County residents who reside outside of Wilmington city limits. Additionally, the County's cooperation agreement with the City of Newark specifies that they receive a HUD-specified portion of funds each year and operate a program independent of County decision making. The County serves as the program administrator for the City of Newark and folds the City of Newark's programs into the County's CP. Approximately 12% of County HUD funding passes through to the City of Newark.

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

New Castle County in collaboration with the Delaware State Housing Authority (DSHA), the City of Dover and the City of Wilmington finalized a comprehensive statewide Analysis of Impediments (AI) to fair housing choice in accordance with HUD established guidelines. The AI is available at: www.destatehousing.com/formsandinformation/pubs.php. For the action items recommended for the jurisdictions that participated in the study, a working group of representatives from the Delaware State Housing Authority (DSHA), NCC, the City of Wilmington and the City of Dover are working collaboratively statewide to review multi-jurisdictional impediments. The working group continues to work on initiatives such as expanding the supply of accessible housing for persons with mobility and sensory impairments, to review the feasibility of instituting inter-jurisdictional mobility of the Section 8 Housing Choice Voucher Program and reviewing the adoption of a statewide definition of areas of concentration as defined in New Castle County 2010-2015 Consolidated Plan by all HUD entitlement jurisdictions. The working group worked in partnership with the Delaware Human Relations Commission throughout the Study's creation and is working with the Commission to schedule statewide training for key stakeholders in housing and public policy.

The working group continues to work on initiatives such as expanding the supply of accessible housing for persons with mobility and sensory impairments, to review the feasibility of instituting inter-jurisdictional mobility of the Section 8 Housing Choice Voucher Program and reviewing the adoption of a statewide definition of areas of concentration as defined in New Castle County 2010-2015 Consolidated Plan by all HUD entitlement jurisdictions. Eleven impediments were identified in the AI and were outlined in the New Castle County Action Plan.

We collaborate with our housing partners and other entitlement jurisdictions to review and aggressively implement recommendations of the Analysis of Impediments (AI) to Fair Housing Choice Study. The Delaware State Housing Authority (DSHA), NCC, City of Wilmington, City of Dover, Wilmington Housing Authority, Dover Housing Authority, Newark Housing Authority and the City of Newark have formed a Fair Housing Consortium and are working collectively to create a new regional Assessment of Fair Housing and develop a coordinated regional response to affirmatively furthering fair housing in each in jurisdiction across the region. The Fair Housing Consortium has contracted with The Lawyers'

Committee for Civil Rights Under Law, and Poverty and Race Research Action Council (PRRAC) as consultants for the development new AI. The jurisdictions are looking forward to the robust community, stakeholder and participant engagement meetings that will help develop a thoughtful and meaningful AI for the State of Delaware. The Draft AI is now available for public comment and can be found on the following site: <https://destatewideai.wordpress.com/>. Due to limited character space within the reporting system, a brief summary of key fair housing activities completed by New Castle County and our sub grantees are included as an attachment. Also included is a copy of the new Draft AI's Executive Summary.

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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

A risk analysis is conducted to conclude if the sub-recipient is a “low risk” or “high risk” and what form of monitoring will be performed at program end. The risk analysis is located at the top of the monitoring checklist.

“Low- risk” sub-recipients include agencies with satisfactory past performance, no previous compliance issues, and agencies that administer “low-risk activities” (those awarded less than \$25,000 in annual funding). “Low-risk” sub-recipients will receive desk monitoring only.

“High-risk” sub-recipients will require a desk monitoring and an on-site monitoring at program end. “High-risk” sub-recipients that may require on-site monitoring might include new sub-recipients, agencies with staff or program changes, programs with compliance or performance issues, those awarded \$25,000 or more in funding or those taking on multiple CDBG and ESG activities.

Due to limited character space within the reporting portal, NCC is unable to include the entire Monitoring Procedure that is outlined in the department's *Standard Operating Procedure-309 Monitoring & the Monitoring Risk Analysis Report*. These documents are readily available and have been shared with our local HUD office representative during HUD monitoring visits.

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.

NCC’s DCS’s Citizen Participation Plan outlines the methods used to inform citizen of plans, reports, notices of funding, and amendments. The Program Year 2018 “DRAFT” CAPER notice of availability was published in the News Journal, the online version of El Tiempo Hispano, sent to those on our stakeholder list and posted on the department website.

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.

New Castle County, Department of Community Services did not have changes in any program objectives.

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

No

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

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CR-50 - HOME 91.520(d)

Include the results of on-site inspections of affordable rental housing assisted under the program to determine compliance with housing codes and other applicable regulations

Please list those projects that should have been inspected on-site this program year based upon the schedule in §92.504(d). Indicate which of these were inspected and a summary of issues that were detected during the inspection. For those that were not inspected, please indicate the reason and how you will remedy the situation.

HOME projects will be inspected by NCC's Department of Land Use Inspector and/or DCS's HOME Program Inspector, when applicable. NCC's Department of Land Use regulates construction to the following building codes: the International Building Code- 2015 Edition; Property Maintenance Code- 2003 Edition and Accessible; and Usable Building and Facilities-American National Standards Edition 2009. The DCS's HOME Program Inspector also ensures that HOME projects meet Section 504 Rehabilitation Act of 1973-Subpart D.

- **ARC of Delaware, Interfaith CHDO, Challenge Program, Habitat for Humanity of New Castle County and Family Help** - the HOME program renovation project was inspected by the Department of Land Use and Community Services' HOME Program inspectors throughout the renovation process.

HOME projects were monitored and inspected by the HOME Program Administrator to ensure that the household met the eligible low-income families' requirement, the affordability requirement, rent limitations and that the project's rents were comparable to fair market rents. The HOME Administrator ensures that the rents do not exceed 30% of the families' adjusted income for the HOME program.

- **Carleton Preservation Associates, Connection CSP, Family Help, Inc, and Sacred Heart Housing, Inc.** -the HOME projects met the above-mentioned requirements.

Provide an assessment of the jurisdiction's affirmative marketing actions for HOME units. 92.351(b)

All HOME recipients are required, at time of application, to submit their agency's Affirmative Marketing Plan which is reviewed to ensure compliance with HUD 24 CFR 92.351(B) and the New Castle County adopted plan prior to the HOME award. Strategies include special notices and announcements in local and minority newspapers circulated throughout New Castle County, as well as, notices to those individuals with special needs. Owners are also required to maintain nondiscriminatory hiring policies, adopt Fair Housing Policies and display a Fair Housing poster in their rental and sales offices. The HOME program renovation projects are inspected throughout the renovation process to ensure effective

affirmative marketing policies meet or exceed the requirements.

Refer to IDIS reports to describe the amount and use of program income for projects, including the number of projects and owner and tenant characteristics

Accomplishments for Program Year 2018 which encompasses July 1, 2018 to June 30, 2019, a total of 35 units were completed. Of that total, twenty-nine were rentals and six were first time homebuyers.

All of the twenty-nine had income less than 30% AMI. A total of 23 were White and 6 were Black or African-American. One reported being of Latino or Hispanic ethnicity. The characteristics of the six homeowners and homebuyers are as follows: five had income less than 50% AMI and one had income less than 80% AMI. A total of two were White and four were Black or African-American. Two reported being of Latino or Hispanic ethnicity.

Zero Program Income was receipted into IDIS for the period July 1, 2018 – June 30, 2019.

Describe other actions taken to foster and maintain affordable housing. 91.220(k) (STATES ONLY: Including the coordination of LIHTC with the development of affordable housing). 91.320(j)

Not applicable

CR-60 - ESG 91.520(g) (ESG Recipients only)

ESG Supplement to the CAPER in *e-snaps*

For Paperwork Reduction Act

1. Recipient Information—All Recipients Complete

Basic Grant Information

Recipient Name	NEW CASTLE COUNTY
Organizational DUNS Number	077095057
EIN/TIN Number	516000160
Identify the Field Office	PHILADELPHIA
Identify CoC(s) in which the recipient or subrecipient(s) will provide ESG assistance	

ESG Contact Name

Prefix	Mrs
First Name	Nicole
Middle Name	0
Last Name	Waters
Suffix	0
Title	Manager

ESG Contact Address

Street Address 1	77 Reads Way
Street Address 2	Gilliam Building
City	New Castle
State	DE
ZIP Code	-
Phone Number	3023955644
Extension	0
Fax Number	3023955591
Email Address	nicole.waters@newcastlede.gov

ESG Secondary Contact

Prefix	
First Name	
Last Name	
Suffix	
Title	
Phone Number	
Extension	
Email Address	

2. Reporting Period—All Recipients Complete

Program Year Start Date 07/01/2018
Program Year End Date 06/30/2019

3a. Subrecipient Form – Complete one form for each subrecipient

Subrecipient or Contractor Name: THE SALVATION ARMY
City: Wilmington
State: DE
Zip Code: 19801, 2221
DUNS Number: 062517941
Is subrecipient a victim services provider: N
Subrecipient Organization Type: Other Non-Profit Organization
ESG Subgrant or Contract Award Amount: 10000

Subrecipient or Contractor Name: YWCA OF DELAWARE, INC
City: Wilmington
State: DE
Zip Code: 19801, 6612
DUNS Number: 364131870
Is subrecipient a victim services provider: Y
Subrecipient Organization Type: Other Non-Profit Organization
ESG Subgrant or Contract Award Amount: 20000

Subrecipient or Contractor Name: Family Promise of Northern New Castle County
City: Wilmington
State: DE
Zip Code: 19808, 5225
DUNS Number: 831572933
Is subrecipient a victim services provider: N
Subrecipient Organization Type: Other Non-Profit Organization
ESG Subgrant or Contract Award Amount: 110000

Subrecipient or Contractor Name: MINISTRY OF CARING - HOPE HOUSE I

City: Wilmington

State: DE

Zip Code: 19806, 4605

DUNS Number: 094346681

Is subrecipient a victim services provider: N

Subrecipient Organization Type: Other Non-Profit Organization

ESG Subgrant or Contract Award Amount: 10000

Subrecipient or Contractor Name: Housing Alliance Delaware

City: Wilmington

State: DE

Zip Code: 19801, 6604

DUNS Number: 137232653

Is subrecipient a victim services provider: N

Subrecipient Organization Type: Other Non-Profit Organization

ESG Subgrant or Contract Award Amount: 24000

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CR-65 - Persons Assisted

4. Persons Served

4a. Complete for Homelessness Prevention Activities

Number of Persons in Households	Total
Adults	0
Children	0
Don't Know/Refused/Other	0
Missing Information	0
Total	0

Table 16 – Household Information for Homeless Prevention Activities

4b. Complete for Rapid Re-Housing Activities

Number of Persons in Households	Total
Adults	0
Children	0
Don't Know/Refused/Other	0
Missing Information	0
Total	0

Table 17 – Household Information for Rapid Re-Housing Activities

4c. Complete for Shelter

Number of Persons in Households	Total
Adults	0
Children	0
Don't Know/Refused/Other	0
Missing Information	0
Total	0

Table 18 – Shelter Information

4d. Street Outreach

Number of Persons in Households	Total
Adults	0
Children	0
Don't Know/Refused/Other	0
Missing Information	0
Total	0

Table 19 – Household Information for Street Outreach

4e. Totals for all Persons Served with ESG

Number of Persons in Households	Total
Adults	0
Children	0
Don't Know/Refused/Other	0
Missing Information	0
Total	0

Table 20 – Household Information for Persons Served with ESG

5. Gender—Complete for All Activities

	Total
Male	0
Female	0
Transgender	0
Don't Know/Refused/Other	0
Missing Information	0
Total	0

Table 21 – Gender Information

6. Age—Complete for All Activities

	Total
Under 18	0
18-24	0
25 and over	0
Don't Know/Refused/Other	0
Missing Information	0
Total	0

Table 22 – Age Information

7. Special Populations Served—Complete for All Activities

Number of Persons in Households

Subpopulation	Total	Total Persons Served – Prevention	Total Persons Served – RRH	Total Persons Served in Emergency Shelters
Veterans	0	0	0	0
Victims of Domestic Violence	0	0	0	0
Elderly	0	0	0	0
HIV/AIDS	0	0	0	0
Chronically Homeless	0	0	0	0
Persons with Disabilities:				
Severely Mentally Ill	0	0	0	0
Chronic Substance Abuse	0	0	0	0
Other Disability	0	0	0	0
Total (Unduplicated if possible)	0	0	0	0

Table 23 – Special Population Served

CR-70 – ESG 91.520(g) - Assistance Provided and Outcomes

10. Shelter Utilization

Number of New Units - Rehabbed	0
Number of New Units - Conversion	0
Total Number of bed-nights available	52,925
Total Number of bed-nights provided	30,722
Capacity Utilization	58.05%

Table 24 – Shelter Capacity

11. Project Outcomes Data measured under the performance standards developed in consultation with the CoC(s)

Performance Standards for evaluating ESG have been developed with the statewide CoC recipients, local jurisdictions and the Housing Alliance of Delaware. These standard community wide project performance measures will be utilized to quantify significant outcomes that will increase permanent housing, stability, and self-sufficiency in the homeless population.

CR-75 – Expenditures

11. Expenditures

11a. ESG Expenditures for Homelessness Prevention

	Dollar Amount of Expenditures in Program Year		
	2016	2017	2018
Expenditures for Rental Assistance	0	0	0
Expenditures for Housing Relocation and Stabilization Services - Financial Assistance	0	0	0
Expenditures for Housing Relocation & Stabilization Services - Services	0	0	0
Expenditures for Homeless Prevention under Emergency Shelter Grants Program	0	0	0
Subtotal Homelessness Prevention	0	0	0

Table 25 – ESG Expenditures for Homelessness Prevention

11b. ESG Expenditures for Rapid Re-Housing

	Dollar Amount of Expenditures in Program Year		
	2016	2017	2018
Expenditures for Rental Assistance	45,470	58,651	62,274
Expenditures for Housing Relocation and Stabilization Services - Financial Assistance	18,031	22,562	22,418
Expenditures for Housing Relocation & Stabilization Services - Services	17,236	8,787	5,308
Expenditures for Homeless Assistance under Emergency Shelter Grants Program	0	0	0
Subtotal Rapid Re-Housing	80,737	90,000	90,000

Table 26 – ESG Expenditures for Rapid Re-Housing

11c. ESG Expenditures for Emergency Shelter

	Dollar Amount of Expenditures in Program Year		
	2016	2017	2018
Essential Services	18,750	15,000	20,000
Operations	56,250	45,000	40,000
Renovation	0	0	0

Major Rehab	0	0	0
Conversion	0	0	0
Subtotal	75,000	60,000	60,000

Table 27 – ESG Expenditures for Emergency Shelter

11d. Other Grant Expenditures

	Dollar Amount of Expenditures in Program Year		
	2016	2017	2018
Street Outreach	0	0	0
HMIS	20,000	24,579	24,000
Administration	14,675	13,300	12,797

Table 28 - Other Grant Expenditures

11e. Total ESG Grant Funds

Total ESG Funds Expended	2016	2017	2018
565,000	190,412	187,879	186,797

Table 29 - Total ESG Funds Expended

11f. Match Source

	2016	2017	2018
Other Non-ESG HUD Funds	0	161,000	0
Other Federal Funds	0	149,696	116,900
State Government	135,243	726,001	634,125
Local Government	0	68,500	55,000
Private Funds	115,000	537,371	424,016
Other	0	75,000	221,512
Fees	0	0	0
Program Income	0	12,600	0
Total Match Amount	250,243	1,730,168	1,451,553

Table 30 - Other Funds Expended on Eligible ESG Activities

11g. Total

Total Amount of Funds Expended on ESG Activities	2016	2017	2018
	440,655	1,918,047	1,638,350

Table 31 - Total Amount of Funds Expended on ESG Activities

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