



**Public Review Draft**  
**City of Biloxi CDBG Entitlement Program**  
**2017 Consolidated Annual Performance Evaluation Report**  
**(CAPER)**

**Review and Comment Period**  
**December 11, 2018 through December 27, 2018**

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and  
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## **CR-05 - Goals and Outcomes (Public Review Draft 12/11/18)**

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

The City of Biloxi's strategic plan identifies six goals that it will focus on addressing during the five-year period of the plan; during PY2017, progress was made toward addressing two of the goals: improving public safety, especially in low- to moderate-income areas, and supporting public service activities that address high-priority, unmet needs of the community.

During PY2017, work continued on the East Biloxi Railroad Crossing Closure and Access Road Construction Project, which will eliminate the public safety threat posed by a railroad crossing and will maintain access to the primarily low- to moderate-income neighborhood through construction of a two-lane road for residents' convenience and to support short emergency vehicle response times. During PY2017, the City also completed Phase 1 of the East Biloxi Police Substation, which was funded with PY2015 CDBG resources. Three public service activities were successfully implemented during PY2017 to support a tenant-based rental assistance program and to expand access to affordable, high quality early childcare programs for eligible families.

The City of Biloxi continues to work with the Mississippi Center for Justice, Biloxi Housing Authority and other area agencies to remove or ameliorate barriers to affordable housing, as identified in its strategic plan and Analysis of Impediments to Fair Housing Choice. During PY2017, the City entered into a contract with the Mississippi Home Corporation, other CDBG entitlement cities and housing authorities to collaborate in developing a statewide Analysis of Impediments. The City also co-hosted its second Fair Housing Education workshop with the Mississippi Center for Justice and Biloxi Housing Authority during PY2017.

### **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
Drainage Improvements	Non-Housing Community Development	CDBG: \$	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	Persons Assisted	1090	1090	100.00%			
Hiller Park Master Plan Implementation	Non-Housing Community Development	CDBG: \$	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	Persons Assisted	0	0				
Howard Avenue Streetscape Improvements	Non-Housing Community Development	CDBG: \$	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	Persons Assisted	0	0				
Public Safety and Welfare	Non-Housing Community Development	CDBG: \$	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	Persons Assisted	674	674	100.00%	0	0	

Public Safety Enhancement	Non-Housing Community Development	CDBG: \$	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	Persons Assisted	1070	0	0.00%			
Public Services	Non-Housing Community Development	CDBG: \$	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	121	251	207.44%	132	130	98.48%
Public Services	Non-Housing Community Development	CDBG: \$	Public service activities for Low/Moderate Income Housing Benefit	Households Assisted	31	48	154.84%	120	17	14.17%
Public Services	Non-Housing Community Development	CDBG: \$	Homeless Person Overnight Shelter	Persons Assisted	0	0		0	0	
Public Services	Non-Housing Community Development	CDBG: \$	Homelessness Prevention	Persons Assisted	0	0		0	0	
Streets, sidewalks and lighting improvements	Non-Housing Community Development	CDBG: \$	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	Persons Assisted	3845	0	0.00%	3845	0	0.00%

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.**

During PY2017, the City of Biloxi budgeted its CDBG resources to address priorities and specific objectives identified in its Five-Year Consolidated Plan and 2017 Action Plan to improve public safety and to support public service activities provided by local nonprofit agencies to help meet high priority, unmet needs. Committed to using its CDBG resources effectively and efficiently to primarily benefit low- to moderate-income residents, the City invested the majority of its PY2017 resources to improving public safety through implementation of the high priority East Biloxi Railroad Crossing Closure and Access Road Construction Project. During PY2017, the environmental review and 30% of the design engineering portion of the contract were completed on schedule. The City's three CDBG public service activities successfully assisted local nonprofit agencies in providing needed services to address/prevent homelessness and to provide affordable, quality early childcare development programs to eligible families.

## 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
White	60
Black or African American	77
Asian	10
American Indian or American Native	0
Native Hawaiian or Other Pacific Islander	0
<b>Total</b>	<b>147</b>
Hispanic	11
Not Hispanic	136

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

### Narrative

As detailed in the chart above, a total of **147** low- to moderate-income families were assisted through activities funded through Biloxi's CDBG Entitlement Program during Program Year 2017. Of these, 60 were White, 77 were Black/African American and 10 were Asian. Included in those assisted are 11 Hispanics.

The Open Doors Homeless Coalition Continuum of Care public service activity provided tenant-based rental assistance to eligible veterans and families with children to prevent or address homelessness during PY2017. Of those assisted, 9 households were White and 8 were Black. All of the households assisted were extremely low-income and 12 of the 17 households were headed by females.

CDBG funds also supported the Moore Community House Affordable Early Childhood Development Program, assisting 66 people during Program Year 2017. Of those assisted, 18 people were White and 48 were Black/African American; the total assisted includes 11 Hispanics.

The City's CDBG resources assisted in funding a third public service activity during PY2017, the Early Childhood Development Program at the Gulf Coast Center for Nonviolence, which benefited a total of 64 extremely-low or low-income people. Of those assisted, 33 people were White; 21 were Black/African American; and 10 were Asian.

During Program Year 2017, 100% of the environmental review portion and 30% of the design engineering portion of the contract were completed for the East Biloxi Railroad Crossing Closure and Access Road Construction Project. Because of the extensive planning required, the project did not provide measurable benefits for Biloxi residents during the subject reporting period. Upon project completion, however, the City estimates that 3,845 residents will benefit from project implementation, of whom 54.88% are low- to moderate income.

Phase 1 of the East Biloxi Police Substation Project, funded with PY2015 CDBG resources, was completed during Program Year 2017. Until Phase 2 Building Exterior and Phase 3 Building Interior are completed, the project will not provide public safety benefits to the estimated 1,070 project area residents, of whom 69.16% are low- to moderate-income.

The design contract for the Saenger Theatre Project also was completed during PY2017, assisted in part with PY2016 CDBG funds. Project beneficiaries will not be generated until comprehensive rehabilitation activities are complete.

## 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	CDBG	615,120	268,953
HOME	HOME	0	0
HOPWA	HOPWA	0	0
ESG	ESG	0	0
Other	Other	0	0

**Table 3 - Resources Made Available**

### Narrative

At the time of 2017 Annual Action Plan submittal to HUD, the City had been notified of its PY2017 CDBG Entitlement Program allocation of \$443,429 and anticipated receiving program income of \$171,691, for total anticipated resources of \$615,120.

Actual CDBG resources available during PY2017 included: program income of \$10,373.65, which was on hand at the beginning of the program year; actual program income received of \$161,226.04; PY2014 carried over funds of \$57,775.25; PY2015 carried over funds of \$106,735.22; and PY2016 carried over funds of \$165,869.12.

During the program year, \$268,953.24 was expended for eligible activities, leaving a PY2017 year-end unexpended balance of \$676,455.04, which included \$1.49 in program income.

The City of Biloxi did not receive HOME, HOPWA, ESG or related HUD funds during PY2017.

In PY2017, the City expended \$49,793 for eligible administrative expenses, which helped fund a portion of staff salaries, legal services and publication of notices required by the Biloxi Citizen Participation Plan.

In PY2017, the environmental review was completed for Phase 1 of the East Biloxi Railroad Crossing Closure and Access Road Construction Project and 30% of the design engineering contract was

completed. PY2016 funds of \$33,500 were expended on this project during PY2017, but no PY2017 funds were expended.

Also in PY2017, the City expended a total of \$54,999.96 for three public service activities, which assisted in addressing high priority, unmet needs of low- to moderate-income residents in Biloxi.

PY2015 funds of \$50,000 were expended during PY2017 on the East Biloxi Police Substation Project for Phase 1 activities. Also in PY2017, \$80,660.28 (the balance of PY2016 funds budgeted for the Saenger Theatre Project design contract) were expended. Exterior and interior rehabilitation of the Saenger Theatre will be funded through a grant from the Mississippi Department of Archives and History and from General Obligation Bonds of the City.

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

<b>Target Area</b>	<b>Planned Percentage of Allocation</b>	<b>Actual Percentage of Allocation</b>	<b>Narrative Description</b>
Central Biloxi Drainage Improvements Project	0	0	Drainage Improvements Project
Central Biloxi Infrastructure Improvements Project (Greater Biloxi Subdivision area)	0	0	Infrastructure Improvements including water, sewer, stormwater, drainage, streets and sidewalks
Central Biloxi/Lee Chinn Fire Station ladder truck acquisition	0	0	Fire Station/Equipment
Central Biloxi/Pass Road	0	0	
Central Biloxi/Pass Road and Hiller Park Area Sidewalk and Street Improvements Project	0	0	Sidewalks and street improvements
East Biloxi Police Substation and Meeting Room	0	0	Public safety
East Biloxi/Division Street	0	0	
East Biloxi/Division Street Neighborhood Facility	0	0	Neighborhood Facilities
East Biloxi/Howard Avenue Streetscape Improvements	0	0	Street improvements, sidewalks, tree planting
Hiller Park Recreational Enhancement Project	0	0	Parks, Recreational Facilities
Petit Bois Drainage Improvements Project	0	0	Drainage Improvements

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



**Narrative**

The City of Biloxi does not geographically distribute its CDBG Entitlement Program resources nor limit expenditure of funds to specific geographical locations, rather CDBG-funded projects are developed based on citizen input to address high-priority, unmet community needs that primarily benefit low- to moderate-income persons.

**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.**

The City of Biloxi's CDBG Entitlement Program does not require leveraging of funds.

**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.**

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

**Table 5 – Number of Households**

	<b>One-Year Goal</b>	<b>Actual</b>
Number of households supported through Rental Assistance	120	17
Number of households supported through The Production of New Units	0	0
Number of households supported through Rehab of Existing Units	0	0

	One-Year Goal	Actual
Number of households supported through Acquisition of Existing Units	0	0
<b>Total</b>	<b>120</b>	<b>17</b>

**Table 6 – Number of Households Supported**

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

The City did not identify goals to provide to provide homeless, non-homeless or special needs households with affordable housing units as it does not receive HOME or ESG funds. However, PY2017 CDBG funds were budgeted in an amount not to exceed \$20,000 for a public service activity to assist the Open Doors Homeless Coalition in addressing and preventing homelessness of eligible veterans and families with children. Because there are many unmet needs in the City of Biloxi, the administration invests most of its limited CDBG resources in public facilities improvement type projects to benefit a larger number of low- to moderate-income residents than resources allow for the construction or purchase of affordable housing for a comparable number of homeless, non-homeless or special needs households.

The PY2017 affordable housing goal for the number of households to be supported through rental assistance was based on data from the City’s PY2016 public service activity to provide tenant-based rental assistance and security/utility deposit assistance to eligible veterans and families with children to prevent and address homelessness in Biloxi. At the time the 2017 Annual Action Plan was developed, only 2<sup>nd</sup> quarter data was available for the PY2016 activity and was reported in terms of persons (not households). Based on the limited data available, the City inaccurately estimated that 30 persons (not households) would benefit during each quarter of PY2017. Actual beneficiaries from this public service activity total 17 households for PY2017.

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

The City of Biloxi budgeted \$20,000 for a public service activity administered by the Open Doors Homeless Coalition to prevent and address homelessness of eligible veterans and families with children through the provision of tenant-based rental and utility/security deposit assistance.

Future annual goals will be more conservative, considering the complexity of activity coordination and fluctuations in the number of households needing assistance who may not wish to participate in the City’s CDBG-funded public service activities. Also, beneficiary data will be reported in compliance with HUD’s standard units of measurement as identified by project type.

During Program Year 2017, the City met on an on-going basis with the Biloxi Housing Authority, the Open Doors Homeless Coalition Continuum of Care, the Gulf Coast Center for Nonviolence, Moore Community House and other nonprofit agencies to discuss CDBG eligible public service activities. Successful implementation of public service activities during PY2016 encouraged the City to

budget PY2017 funds for the same activities, enhancing progress made toward eliminating homelessness in Biloxi and providing improved access to affordable, quality childcare services for eligible households.

**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.**

<b>Number of Households Served</b>	<b>CDBG Actual</b>	<b>HOME Actual</b>
Extremely Low-income	17	0
Low-income	0	0
Moderate-income	0	0
<b>Total</b>	<b>17</b>	<b>0</b>

**Table 7 – Number of Households Served**

**Narrative Information**

In Number of Households Served Chart, above, the 17 extremely low-income households served results from the public service activity to prevent and address homelessness for veterans and families with children through tenant-based rental and utility/security deposit assistance.

**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 Biloxi has decreased unsheltered homelessness by \_\_\_% from January 2017 to January 2018. The City of Biloxi is sustaining a functional end to homelessness among veterans and is making progress in reducing chronic homelessness. An effort has been made to identify youth experiencing homelessness and provide solutions. Partner agencies ensure that any identified unsheltered families with children are housed as quickly as possible, usually within 14 days. Since there are few shelter beds in Biloxi, partner agencies use local hotel stays as shelter when necessary as individuals and families await their move in to housing.

During PY2017, the City continued to work with the Open Doors Homeless Coalition Continuum of Care and other local nonprofit agencies to address homelessness in Biloxi. The City’s direct investment in rental assistance and case management, combined with the cooperative relationship among organizations resulted in assisting \_\_\_ extremely low-income households and \_\_\_ low-income homeless

households in obtaining and successfully maintaining housing. \_\_\_ extremely low-income households remained in housing despite facing eviction.

The City participated in the Open Doors Homeless Coalition's point in time count of homeless individuals as part of the community's effort to reach out to and assess individual needs of homeless persons during 2017. In January 2017 and January 2018, sheltered and unsheltered persons experiencing homelessness were counted in soup kitchens, day centers, shelters, in camps and other places frequented by homeless persons. Each person was assessed using the nationally recognized Vulnerability Index - Service Prioritization Decision Assistance Tool (VI-SPDAT). The VI-SPDATs were entered into a coordinated entry portal in HMIS and used to create a prioritized list of homeless veterans, chronically homeless persons and other persons experiencing homelessness in Biloxi.

Monthly outreach and assessment of homeless veterans, prioritization of persons most in need for housing, and monthly tracking of housing placements resulted in Biloxi meeting its objectives to reduce and end homelessness. \_\_\_% of the households assisted during calendar year 2017 successfully remained in housing and homelessness among veterans was effectively ended.

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

There are no shelter beds in the City of Biloxi other than shelter for persons fleeing domestic violence. In cold weather, shelter options exist in D'Iberville, Ocean Springs and Gulfport. If a veteran or homeless family with children seeks shelter in Biloxi through a Supportive Services for Veterans Families (SSVF) or Emergency Solutions Grant Program (ESG) provider, in limited circumstances hotel rooms may be provided until a permanent housing solution is available.

Located in the City of Biloxi, the Gulf Coast Center for Nonviolence manages six transitional housing units for individuals and families fleeing domestic violence. Rebekah's House provides transitional housing for three families with children.

**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**

In the City of Biloxi, Back Bay Mission, Gulf Coast Center for Nonviolence and Open Doors Homeless Coalition manage homelessness prevention programs under the Emergency Solution Grant Program (ESG through Mississippi Home Corp). Extremely low-income individuals and families who are facing eviction can be linked to financial assistance and supportive services. Individuals and families who are literally homeless can be linked to housing through rapid rehousing assistance.

A program for the prevention of homelessness among veterans and their families is the Supportive Services for Veterans Families (SSVF through the Veterans Administration) managed by Oak Arbor in

Hattiesburg and Soldier On in Jackson. Both programs serve veterans and their families in Biloxi as part of their service area. In addition, Back Bay Mission manages emergency assistance programs for veterans and nonveterans.

The City of Biloxi's new CDBG-funded public service activity supported Open Door's on-going efforts to prevent and address homelessness through rental assistance to 17 households during PY2017. Unfortunately for extremely low-income individuals and families in Biloxi who fall behind in rent, there are not enough prevention funds to meet the need. While \_\_\_ families were stabilized through prevention assistance in PY2017, the need for prevention services is substantially higher. More than \_\_\_ extremely low-income and low-income Biloxi residents requested homelessness prevention services during PY2017 and prevention funds were inadequate to assist them.

When homeless persons are discharged from mental health centers, they are linked to housing and supportive services through Olmstead-driven programs. When homeless persons are discharged from the VA Medical Center, they are linked with VASH vouchers or SSVF services. When someone is released from prison or jail and is homeless, there are few resources available in Biloxi to assist them; re-entry services are a great need. When youth "age out" of foster care, the Harrison County Department of Human Services holds the responsibility for a smooth transition to self-sufficiency. The Gulf Coast Mental Health Association links disabled persons to SSI benefits for which they are eligible through the SOAR program.

While there are gaps in housing and service opportunities for people who entered any of the publicly-funded institutions as homeless transition to a permanent solution in the community, the responsibility for discharge planning lies with the institution. In Biloxi, the Open Doors Homeless Coalition takes the lead, working with the City and other Coalition members, when needed, to address discharges appropriately and to ensure that individuals and families are linked to mainstream resources.

The Open Doors Homeless Coalition Continuum of Care and its members link clients to food stamps, primary health care services from Coastal Family Health, employment through the WIN Job Center, and other benefits, as appropriate.

**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**

Every person experiencing literal homelessness in the City of Biloxi on January \_\_\_, 2017 was sought out to be counted, assessed with the VI-SPDAT and prioritized for housing opportunities. \_\_\_ literally homeless, including \_\_\_ persons who have experienced domestic violence, \_\_ veterans, \_\_\_ chronically homeless persons, and other with disabilities and very-low incomes were counted. There were no unsheltered children counted in the City of Biloxi.

Each month during PY2017, approximately \_\_\_ people became homeless in Biloxi due to evictions, family issues, addictions, untreated mental health issues and/or job loss. Some of the households were able to resolve their homelessness without social service interventions. Some families with children found transitional housing options at Rebekah's House; some found emergency assistance or rapid rehousing options with Back Bay Mission or Open Doors Homeless Coalition. Homeless veterans and their families found assistance through the Biloxi VA, Oak Arbor, Hancock Resource Center or Soldier On. Many individuals and families with children who were fleeing domestic violence found shelter and safe permanent housing through the Gulf Coast Center for Nonviolence. Disabled persons who were homeless for an extended period of time were eligible for assistance through Back Bay Mission, the Mental Health Association of South Mississippi or Seashore Mission.

Using a centralized coordinated entry approach, people who become homeless in Biloxi can contact an agency and be assessed for housing and services. Targeted outreach efforts identified and assessed persons experiencing homelessness in camps who may have been disconnected from other services.

Families with children who may be literally homeless are linked to appropriate programs as quickly as possible in order to reduce the trauma that homelessness poses for children. Frequently, the school system identifies a family as homeless and contacts an agency that makes the linkages to a shelter, transitional program or rapid re-housing.

Biloxi prioritizes housing and services for chronically homeless persons; 72% of the permanent supportive housing units in Biloxi funded through the HUD Continuum of Care are reserved for chronically homeless individuals and families. Efforts are underway to operationalize the by-name list of chronically homeless persons and families in Biloxi, establish full coordination among service providers, target outreach to chronically homeless persons in the day care centers and camps, establish additional funding sources, strengthen relationships with landlords, work to appropriately house chronically homeless persons and fully implement critical time intervention case management strategies.

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

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

The City of Biloxi has a cooperative working relationship with the Biloxi Housing Authority, which currently serves 1,743 families through its allocation of: Rental Assistance Demonstration (RAD); Tenant Based Housing Choice Vouchers (TBV); Project Based Housing Choice Vouchers (PBV); Veteran's Affairs Supportive Housing Vouchers (VASH); Low Income Housing Tax Credit (LIHTC); and Market Rate units.

BHA owns and manages 11 affordable housing complexes in the City, which comprise a combined total of 908 RAD units. According to information provided by the Executive Director, BHA-managed units have a 97% occupancy rate and units generally are filled within five days of availability. Some units are temporarily vacant to allow for repairs, cleaning and installation of improvements in between occupancy of different tenants. In PY2017, BHA managed a waiting list of approximately 3,000 applicants.

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

The residents of BHA properties are all eligible to participate in the Resident Council process; each development has its own Resident Council that meets monthly with BHA personnel to discuss any issues or concerns related to their tenancy.

There also is a Citywide Resident Council that represents all of the properties in Biloxi and all residents are encouraged and invited to comment on development of BHA's 5-Year and Annual Plans. BHA does not have any homeownership units currently available for sale, but any resident wishing to explore homeownership opportunities is referred for homeownership counseling offered by Mercy Housing and other counseling agencies in the area.

All residents also are offered Resident Services through BHA's Management Services staff, which assists residents with accessing numerous programs and referrals that improve their quality of life and offer education and training in numerous occupations.

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

Not applicable - the Biloxi Housing Authority is not designated as troubled.

**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)**

During Program Year 2017, the Biloxi Federal Programs staff actively worked with the Mississippi HOME Corporation to lobby for and assist with planning for development of a statewide plan to affirmatively further fair housing. Staff continued to take advantage of educational opportunities such as webinars and workshops, but also participated with HOME Corp in numerous conference calls and meetings to assist in selection of a qualified firm and structuring a workable contract with a specific timeline for implementation. Mississippi Gulf Coast CDBG Entitlement Program cities and Public Housing Authorities are participating in the statewide plan at a higher level than originally anticipated, partly because of Biloxi staff encouragement and its willingness to help organize and host meetings and public workshops.

Throughout PY2017, the City's Federal Programs staff also continued to discuss with Planning Division staff potential Biloxi Land Development Ordinance amendments to add definitions and text to more specifically promote compliance with Fair Housing and Americans with Disabilities Act requirements and policies.

In prior years, subdivision regulations were updated to allow a variety of lot sizes and residential densities in support of affordable housing construction and group living arrangements throughout the City.

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

Biloxi's subdivision regulations have been updated to allow a variety of lot sizes and residential densities throughout the City in support of affordable housing construction, group home and other living arrangements to meet underserved populations. The City is considering other revisions to its ordinances in addition to actively participating in development of a statewide plan to affirmatively further fair housing to better serve those whose rights are protected through the Fair Housing and Americans with Disabilities Acts.

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

During PY2017, the City continued its efforts to educate the public about lead-based paint hazards, which included providing educational brochures about lead-based paint hazards, testing and abatement, which are available to the public at no charge in various City buildings frequented by the general public.

The City's code enforcement regulations require that housing structures that are being substantially rehabilitated or repaired are upgraded to meet code standards, which will eliminate or reduce the likelihood of lead-based paint exposure. The Biloxi Housing Authority requires abatement of lead-based hazards prior to public housing rehabilitation or renovation.

The Mississippi Region VIII Housing Authority abates any lead-based paint reported in its LRPB units with funds from its Comprehensive Grant Program. During PY2017, the Regional Housing Authority continued to require owners of housing units inspected for Section 8 eligibility to scrape and repaint any surface areas where paint was chipping or peeling; this was enforced through the on-going inspection program. Region VIII also continued its lead-based paint hazard education program, providing informational literature to Section 8 families with children less than six years of age.

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

The City continues to work with public and private agencies, including private housing developers, to identify and access resources to support private development of workforce housing on the Biloxi Peninsula, in close proximity to its major employers, to reduce housing and transportation costs for poverty-level families. High construction and insurance costs in this area, resulting from the area's low elevation and more stringent federal and local building codes, create a significant challenge to expanding workforce housing to move toward ending the cycle of poverty.

The City of Biloxi has an active economic and community development agenda to support existing businesses and attract new businesses to Biloxi. A tax rebate program has been established to incentivize business and employment expansions. The City complies with Section 3 requirements for all applicable federally-funded projects to promote the hiring of locals. The City also supports affordable educational programs offered through a city-county business incubator and the two chambers of



commerce that address of a wide variety of topics to assist start-up and other small businesses in succeeding.

The City of Biloxi also has one of lowest costs of living in South Mississippi, with affordable public transportation services, no property tax rates in many years and one of the lowest water/sewer rates in the region to assist low-income families in stretching their limited resources further.

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

As an active participant in efforts to develop a statewide plan to affirmatively further fair housing, the City of Biloxi continued to work during Program Year 2017 to promote compliance with Fair Housing and Americans with Disabilities Act requirements and policies. As in previous years, Federal programs staff co-hosted a Fair Housing Workshop with the Mississippi Center for Justice and the Biloxi Regional Housing Authority. The 2017 workshop focused on policies of interest or concern to local lending institutions. In addition to bankers and credit union representatives, several local and regional social service agencies attended. Following a presentation by the Mississippi Center for Justice, a lively discussion ensued about fair housing rights and responsibilities. A consensus was reached that this type of workshop improves communication, leading to better coordination of resources and assistance for those whose rights the Fair Housing Act was designed to protect.

During PY2017, Biloxi staff worked on an on-going basis with the Biloxi Housing Authority, the Open Doors Homeless Coalition Continuum of Care, and other service agencies and educational institutions to improve the quality of life of its residents and to address unmet community needs, especially for low-income families and individuals. During PY2017, staff worked with Open Doors, Moore Community House and the Gulf Coast Center for Nonviolence to continue providing three high priority public service activities that are partially funded with CDBG resources. There continues to be a need in Biloxi for quality early childhood education programs that are affordable and for tenant-based rental assistance to help prevent and address homelessness among veterans and families with children.

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

Through the three public service activities it assists in funding with its CDBG resources, the City of Biloxi continued in PY2017 to support coordination between public and private housing and social service agencies. By participating in the regular meetings of the Continuum of Care, engaging in almost weekly communications with the Biloxi Housing Authority and establishing an on-going working relationship with the Mississippi HOME Corp to plan and implement a statewide plan to affirmatively further fair housing, Biloxi Federal Programs staff enhanced collaborative efforts to improve the quality of life for those protected by the Fair Housing and Americans with Disabilities Acts.

The City staff complies with the intent and requirements of its Citizens Participation Plan to improve public outreach and education by publishing, emailing and posting notices of CDBG public hearings. All known local and regional social service agencies are invited and encouraged to attend CDBG hearings and workshops and oral and written input is requested. In addition to posting documents on its

website, hard copies of HUD-required documents are made available for public review at the Biloxi Housing Authority in addition to four libraries and various City buildings.

During PY2017, the City continued to support applications of local social service agencies to access state and federal resources; Federal Programs staff also reached out to Mississippi HOME Corp on behalf of a Coast nonprofit housing agency to clarify and confirm availability of affordable housing funding.

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

During PY2017, the Federal Programs staff continued to work with City Planning staff to encourage development and adoption of a Land Development Ordinance amendment to expand text and definitions relating to the Fair Housing and Americans with Disabilities Acts. Staff again collaborated with the Mississippi Center for Justice and Biloxi Housing Authority to co-host a public education workshop that targeted lending institutions to improve their understanding of their responsibilities under the Fair Housing and Americans with Disabilities Acts.

As part of its community education outreach activities during 2017, the City also became actively involved with efforts to develop a statewide analysis of impediments to fair housing choice and reached out to other Coast municipalities and regional housing authorities to encourage their participation. The Mississippi HOME Corporation advertised for and executed a professional services contract for development of the statewide plan; Biloxi's Federal Programs served on the selection committee.

During the last quarter of PY2017, Federal Programs staff participated in the distribution and collection of public input surveys regarding fair housing in Biloxi; the City also posted the survey on its website; provided multiple copies to social service agencies; and made it available at ward meetings conducted by Council Members. During late PY2017, staff also worked to schedule public input workshops on the Coast, which will be conducted in early PY2018 in the Cities of Biloxi and Moss Point. The workshops will provide residents an opportunity to learn more about the Fair Housing Act and the purpose of the statewide plan in addition to offering citizens an opportunity to provide input orally and/or in writing.

**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**

The City of Biloxi regularly monitors its performance in spending CDBG funds and meeting program goals through timely expenditure of these funds. The City more formally assesses its performance at least once annually and conducts an annual public hearing to inform the public of its progress in implementing and completing CDBG-funded activities each program year.

Expenditures are monitored on an on-going basis throughout implementation of each activity to insure timeliness of expenditures and compliance with project budgets as well as eliminate opportunity for mismanagement, fraud or waste.

The City utilizes existing policies and procedures to monitor program administration and regulatory compliance. To insure compliance, the staff monitors specific areas as follows: program performance review; financial management practices; record keeping and reporting practices; general management practices; compliance with EEO, Fair Housing, ADA, anti-discrimination and others.

To insure compliance with program requirements, including minority business outreach, timeliness of expenditures and comprehensive planning requirements, City staff attends HUD-sponsored workshops and training on an on-going basis, participates in applicable webinars and incorporates HUD guidance into its programs and operating procedures. The staff also regularly communicates with HUD Field Office staff and reviews the HUD website for program compliance updates.

City compliance is specifically discussed at each CDBG public hearing, including comprehensive planning and timeliness of expenditures. Compliance with minority business outreach requirements is insured through ongoing implementation of the City's procedure requiring all HUD-funded Requests for Proposals and Requests for Qualifications be provided in a timely manner to the Mississippi Contract Procurement Center and mailed, return receipt requested, to known minority and female-owned firms.

The City's outreach to minorities and women includes posting information in English, Spanish and Vietnamese on the City's website and in public buildings located throughout the City, including the Biloxi Housing Authority. Written flyers are distributed in English, Spanish and Vietnamese to known local nonprofits that serve and/or represent minorities, low-income residents, and nonEnglish-speaking residents.

#### **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.**

The City complies with the intent and literal requirements of its Citizen Participation Plan by making every effort to encourage broad public input into development of activities and programs assisted with CDBG Entitlement Program resources.

In an effort to provide citizens with reasonable notice and opportunity to comment on performance reports and other HUD-required plans and reports, the City of Biloxi not only publishes and posts notices, but delivers flyers in English, Spanish and Vietnamese to known nonprofits that serve nonEnglish-speaking residents, low-income residents, minorities and persons with disabilities. The flyers and notices invite and encourage participation by all residents into the CDBG process through submission of oral and written comments.

The City of Biloxi makes its annual Comprehensive Performance Review and Evaluation Report (CAPER) available to the public for examination and comment for a period of at least 15 days and publishes two notices to advertise the report's availability for review. In addition to posting each annual performance report on its website for public review, hard copies are distributed to the four branches of the Biloxi Public Library, the Biloxi Housing Authority, the Mayor's Office, City Hall, the Community Development Department and the Public Works/Engineering Building for public review. The published notices indicate where the public review copies are located.

A public hearing for the PY2017 CAPER was held on December 11, 2018, having been advertised twice in a local newspaper and posted as described above. All notices included information about the availability of the 2017 CAPER for public review and encouraged attendance at the public hearing. Compliance with the Biloxi Citizen Participation Plan for the 2017 CAPER is documented in an attachment at screen CR-00 Administration. \_\_\_ oral and \_\_\_ written comments were formally submitted to the City for consideration during the citizen participation process for development of the 2017 CAPER.

### **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.**

At this time, the City does not plan to change its program objectives. As a result of successful implementation of past activities and programs, the City plans to continue developing its Annual One-Year Action Plan with considerable input from citizens and funding activities to address high-priority, unmet needs identified in its Five-Year Consolidated Plan.

The City will continue to seek input from local and regional housing and social service agencies, including the regional Continuum of Care and Biloxi Housing Authority, as well as from the general public, to maximize investment of limited CDBG resources. The City will continue to work to maximize efficient use of limited federal, state and local resources to improve all residents' quality of life.

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

No