



## **CITY OF BILOXI PUBLIC REVIEW DRAFT**

### **2024 CONSOLIDATED ANNUAL PERFORMANCE AND EVALUATION REPORT (CAPER)**

To be considered for incorporation into this document, public comments regarding the 2024 CAPER Public Review Draft must be received by the City by 4:00 p.m., Monday, December 1, 2025. Written comments may be delivered to the Federal Programs Office at 214-A Delauney Street, Biloxi, MS; mailed to the Federal Programs Office at P.O. Box 429 Biloxi, MS 39533; or emailed to [psnyder@biloxi.ms.us](mailto:psnyder@biloxi.ms.us).

#### **CR-05 - Goals and Outcomes**

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

Funded as the City's primary Community Development Block Grant (CDBG) Entitlement Program project for the last several years, Phase II of the East Biloxi East-West Neighborhood Access Road was substantially completed during PY2024, with engineering design services, acquisition of two parcels between Querens and Graham and the initiation of construction.

This multi-year infrastructure project is improving transportation connectivity in several East Biloxi historic neighborhoods and enhancing public health and safety by improving emergency response times. Phase I involved construction of a two-lane vehicular access road from Dorries to Crawford Streets north of the CSX Railroad tracks, directly serving 4,285 residents, of which 2,685 or 62.66% qualify as low- to moderate-income.

Upon completion of Phases II and III of access road construction, an additional 2,450 residents will be directly served by a second section of the two-lane vehicular access road, located between Hopkins Boulevard and Porter Avenue, also north of the CSX Railroad tracks. Of the 2,450 total served, 1,325 or 54.08% qualify as low- to moderate-income residents. A combined total of 6,735 residents will be served by the multi-year project, 4,010 or 59.5% of whom are low- to moderate income residents.

**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)**

| Goal                                   | Category                          | Source/<br>Amount | Indicator                                                                   | Unit of<br>Measure  | Expected<br>Strategic<br>Plan | Actual<br>Strategic<br>Plan | Percent<br>Complete | Expected<br>Program<br>Year | Actual<br>Program<br>Year | Percent<br>Complete |
|----------------------------------------|-----------------------------------|-------------------|-----------------------------------------------------------------------------|---------------------|-------------------------------|-----------------------------|---------------------|-----------------------------|---------------------------|---------------------|
| Expand Economic Opportunities          | Expand Economic Opportunities     | CDBG:<br>\$       | Jobs created/retained                                                       | Jobs                | 10                            | 0                           | 0.00%               | 0                           | 0                         | 0                   |
| Infrastructure Improvements            | Non-Housing Community Development | CDBG:<br>\$       | Public Facility or Infrastructure Activities other than LMI Housing Benefit | Persons Assisted    | 25                            | 1590                        | 6,360%              | 0                           | 0                         | 0                   |
| Nonprofit Agency Facility Improvements | Non-Housing Community Development | CDBG:<br>\$       | Other                                                                       | Other               | 5                             | 0                           | 0.00%               | 0                           | 0                         | 0                   |
| Public Safety Improvements             | Non-Housing Community Development | CDBG:<br>\$       | Public Facility or Infrastructure Activities other than LMI Housing Benefit | Persons Assisted    | 25                            | 7315                        | 35,620%             | 0                           | 0                         | 0                   |
| Public Services-Housing Services       | Affordable Housing Homeless       | CDBG:<br>\$       | Public service activities for LMI Housing Benefit                           | Households Assisted | 15                            | 0                           | 0.00%               | 0                           | 0                         | 0                   |

|                                                             |                                                                              |             |                                                                                      |                     |                                         |      |         |     |     |         |
|-------------------------------------------------------------|------------------------------------------------------------------------------|-------------|--------------------------------------------------------------------------------------|---------------------|-----------------------------------------|------|---------|-----|-----|---------|
| Public Services-<br>Natural Disasters<br>& Emergencies      | Affordable<br>Housing<br>Homeless<br>Non-Housing<br>Community<br>Development | CDBG:<br>\$ | Public service<br>activities other than<br>LMI Housing Benefit                       | Persons<br>Assisted | 70                                      | 65   | 92.86%  | 0   | 0   | 0       |
| Public Services-<br>Non-Housing<br>Community<br>Development | Non-Housing<br>Community<br>Development                                      | CDBG:<br>\$ | Public service<br>activities other than<br>LMI Housing Benefit                       | Persons<br>Assisted | 265                                     | 1012 | 381.89% | 172 | 258 | 150.00% |
| Public Services-<br>Non-Housing<br>Community<br>Development | Non-Housing<br>Community<br>Development                                      | CDBG:<br>\$ | Homeless Person<br>Overnight Shelter                                                 | Persons<br>Assisted | 0                                       | 0    | 0.00%   | 0   | 0   | 0       |
| Transportation<br>Improvements                              | Non-Housing<br>Community<br>Development                                      | CDBG:<br>\$ | Public Facility or<br>Infrastructure<br>Activities other than<br>LMI Housing Benefit | Persons<br>Assisted | 4285<br>(Phase I)<br>2450<br>(Phase II) | 6735 | 100.00% | 0   | 0   | 0       |

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

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

The City of Biloxi’s Program Year 2024 CDBG resources were budgeted to address high priority projects and achieve specific objectives to enhance public safety and transportation, especially in low- to moderate-income neighborhoods. By funding Phase II of the multi-year East Biloxi East-West Access Road Project, the City accomplished its primary program year goals and directly benefited a total of 6,735 residents, 4,010 of whom qualify as low- to moderate-income. The new two-lane roads provide vehicular access through neighborhoods to improve emergency response times and maintain connectivity among neighbors.

Three high priority public service activities provided by local non-profit agencies were supported by CDBG subgrant awards from the City in PY2024. High priority activities included: expanding access to affordable, education-oriented early childcare services;

continuing a therapeutic education program for children who experienced domestic violence; and mental healthcare assessments and treatment services primarily for homeless residents of Biloxi. In response to the CDBG PY2024 investment of funds, a total of 258 low-income residents benefited from the three public services activities; 209 of these residents were extremely low-income and 49 were low-income. Of those benefiting, 136 lived in female-headed households.

No CDBG-CV funds were budgeted or expended by the City in PY2024 for “Public Services-Natural Disasters & Emergencies” or for “Nonprofit Agency Facility Improvements” Projects. Since PY2021, the local rate of COVID has not justified the City’s use of CDBG-CV funds to prevent or respond to the coronavirus. During PY2024, the HUD Field Office reversed its prior year recommendation to the City regarding implementation of Biloxi’s proposed project to invest the balance of its CDBG-CV funds to redevelop an existing facility into a non-congregate homeless shelter to be operated by the Open Doors Homeless Coalition. At that time, HUD advised it was unlikely the City would be able to meet the CDBG-CV expenditure deadline for use of its CDBG-CV balance.

Subsequently, HUD’s deadline for expenditure of CDBG-CV funds was extended to June 2026 and, during PY2024, the HUD Field Office urged the City to implement a public facilities project using its CDBG-CV balance to prepare for future federally-declared emergencies by improving the Gruich Community Center’s HVAC system to improve air quality. During PY2024, the City completed the project environmental assessment, designed the project in-house, advertised for and accepted bids for project implementation and awarded a contract to DNP, Inc. on July 29, 2025.

The proposed project will enhance the Gruich Community Center’s ability to serve its dual role as a public community center and a local disaster response facility. Improvements include replacing existing heat pumps with new units and replacing the ductwork system with a new system that will reduce air borne contaminants to improve air quality, circulation and ventilation. The contract provides a 120-day project period to ensure CDBG-CV funds are expended by the contractor and reimbursement is made by HUD to the City prior to the June 2026 expenditure deadline.

A total of 7,135 low- to moderate-income residents live in the project service area and are anticipated to benefit from this CDBG-CV-funded project.

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

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

| Race and Ethnicity                        | Beneficiaries |
|-------------------------------------------|---------------|
| White                                     | 79            |
| Black or African American                 | 136           |
| American Indian or American Native        | 2             |
| Black/African Am & White                  | 21            |
| Native Hawaiian or Other Pacific Islander | 1             |
| Other multi-racial                        | 19            |
| <b>Total</b>                              | <b>258</b>    |
| Hispanic                                  | 32            |
| Not Hispanic                              | 226           |

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

### Narrative

In PY2024, the City invested 9.09% of the 15% allowed by HUD regulations for public service activities that supported nonprofit agencies' programs to: expand access to an affordable, education-oriented early childhood program for children six weeks to three years old; provide a therapeutic educational program for children under the age of eight who experienced domestic violence; and to conduct mental health assessment and treatment services primarily for homeless people in Biloxi.

The three public service activities were projected to benefit a combined total of 258 people and the City met its goal in that regard. The racial and ethnic status of those assisted is identified in Table 2, above. Of the 258 total beneficiaries, 209 qualified as extremely low-income and 49 qualified as low-income; 136 beneficiaries resided in female-headed households.

The City did not continue its CDBG-CV funded rental assistance public service activity during PY2024 as COVID-19 rates remained low in both the City of Biloxi and Harrison County and no CDBG-CV funds were expended for other projects or activities.

### CR-15 - Resources and Investments 91.520(a)

**Identify the resources made available In PY2024**

| Source of Funds | Source           | Resources Made Available<br>\$ | Amount Expended<br>\$ |
|-----------------|------------------|--------------------------------|-----------------------|
| CDBG            | public - federal | 867,501.97                     | 388,508.76            |

**Table 3 - Resources Made Available**

#### Narrative

The majority of PY2024 CDBG funds was budgeted to one project: Phase II of the East Biloxi East-West Neighborhood Access Road Project. This transportation improvement project will maintain and improve connectivity in several low- to moderate-income neighborhoods located north of the CSX Railroad tracks, to improve public health and safety through improved emergency response times for residents.

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

| Target Area    | Planned Percentage<br>of Allocation | Actual Percentage of<br>Allocation | Narrative<br>Description |
|----------------|-------------------------------------|------------------------------------|--------------------------|
| Not applicable | Not applicable                      | Not applicable                     | Not Applicable           |

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

#### Narrative

The City of Biloxi does not geographically distribute or assign use of its limited CDBG funds to targeted areas to meet high priority

needs of its CDBG-eligible residents. Instead, it funds CDBG-eligible projects to help address high priority community needs identified in its Consolidated Plan. The City also considers the number of eligible residents who will benefit from implementation of each project, with the intent of providing suitable living environments for the highest number of low- to moderate-income households possible.

**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 CDBG Entitlement Program does not require funds be matched, but City-owned rights-of-way were incorporated into the East Biloxi East-West Neighborhood Access Road Project as needed.

## **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  | 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**

|                                                          | One-Year Goal | Actual |
|----------------------------------------------------------|---------------|--------|
| Number of households supported through Rental Assistance | 0             | 0      |

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

**Table 6 – Number of Households Supported**

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

Due to the high cost of housing construction and increasing costs for property insurance south of Interstate 10, the City typically does not invest its limited CDBG resources to build, rehabilitate or acquire housing. On-going changes to the National Flood Insurance Program (NFIP) have resulted in annual premium increases for residential property insurance, which most homeowners with mortgages are required to carry. According to NFIP, residential insurance premiums for housing units located south of Interstate-10 are anticipated to increase annually for the next several years, making many reconsider homeownership in Biloxi.

The City budgeted 100% of its first allocation of CDBG-CV funds to provide rental assistance on behalf of low- to moderate-income residents negatively impacted by the pandemic but it was prevented from achieving the goal of expending 100% of those funds for much-needed subsistence payments, based on directions from the HUD Jackson Field Office, which questioned the use of CDBG-CV funds for rent assistance as an eligible activity.

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

Unless the costs of housing construction and rehabilitation, construction material, and federal flood insurance premiums decrease significantly, the City does not anticipate funding housing activities with its limited CDBG resources during the remainder of the period covered by its 2020-2024 Consolidated Plan.

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

| <b>Number of Households Served</b> | <b>CDBG Actual</b> | <b>HOME Actual*</b>   |
|------------------------------------|--------------------|-----------------------|
| Extremely Low-income               | 0                  | Not applicable        |
| Low-income                         | 0                  | Not applicable        |
| Moderate-income                    | 0                  | Not applicable        |
| <b>Total</b>                       | <b>0</b>           | <b>Not applicable</b> |

**Table 7 – Number of Households Served**

\*The City is not an entitlement under HUD’s HOME Program.

### **Narrative Information**

Without a substantial increase in its annual allocation from HUD, the City of Biloxi determined that the most effective use of its limited CDBG resources is to benefit the largest number of eligible residents possible rather than providing housing assistance to benefit three or four households. Through goals identified in its 2020-2024 Consolidated Plan, the City of Biloxi plans to continue budgeting CDBG funds for one or two high priority community benefit projects and supporting high priority public services provided by experienced nonprofit agencies to help meet community needs.

Because of the aforementioned increasing costs of living, homeownership in Biloxi is no longer considered affordable for many, if not most, low- to moderate-income households. While individual household needs and community-wide needs have substantially increased since the COVID pandemic, CDBG allocation amounts awarded to the City have decreased. Recent CDBG allocations received by the City of Biloxi are as follows: PY2020 \$462,382; PY2021 \$452,491; PY2022 \$415,164; PY2023 \$404,451 and PY2024 \$403,868.

### **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**

During PY2024, the City of Biloxi continued to work with the MS-503 Continuum of Care, with Open Doors Homeless Coalition as Lead, and the CoC’s member agencies to reduce and end homelessness in all categories within the City. Open Doors shared

information with the City from its homeless population assessments to maintain awareness of the lack of available affordable housing and related needs of homeless individuals and families in Biloxi.

In collaboration with the CoC and Open Doors, the City of Biloxi continued working with the Biloxi Housing Authority, Gulf Coast Center for Nonviolence, Coastal Family Health Center, Back Bay Mission, the Biloxi Catholic Diocese and other agencies and stakeholders during PY2024 to share information about Biloxi's homeless and at-risk of homelessness populations and continued working with these partners to generate private donations to meet housing-related needs of homeless populations.

The City supported efforts of the Biloxi Diocese to operate a camp for homeless populations on the former site of Mercy Cross Parochial School. Back Bay Mission, The Salvation Army-Biloxi, Gulf Coast Rescue Mission, Gulf Coast Center for Nonviolence and Community Care Network offered limited emergency shelter and/or transitional housing and a range of supportive services to assist those experiencing homelessness.

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

Ongoing community effort to provide emergency shelter and transitional housing for the unsheltered in Biloxi continued during PY2024 on a case-by-case basis, led by the MS-503 CoC and its Lead agency, the Open Doors Homeless Coalition. Non-housing supportive service needs of homeless populations were met as funding and other resources allowed. Community efforts to educate the public about unmet needs of local homeless populations and to identify and secure resources for development of a homeless shelter and additional transitional housing units in Biloxi continued.

Through General Fund contributions, the City also continued to support efforts of the Gulf Coast Center for Nonviolence (GCCFN), Back Bay Mission, The Salvation Army-Biloxi and the other organizations that provided housing and supportive services during PY2024.

GCCFN reported that its Biloxi therapeutic children's program served a total of 142 children during PY2024. In terms of emergency shelter services, GCCFN served 373 adults and 161 children during 2024, significantly more than the 166 adults and 106 children served in 2023. In terms of total Nights of Service, 14,410 people in Biloxi were served in 2024, compared with the approximate total of 8,623 Nights of Service provided in 2023. A total of 205 nonresidential clients were served with financial assistance, counseling and/or court/legal advocacy in Biloxi during 2024, a decrease from the 587 nonresidential clients assisted during 2023.

#### **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**

During PY2024, the City continued efforts to encourage local housing services agencies and religious institutions to expand services to provide assistance to help low-income individuals and families avoid becoming homeless, especially extremely low-income individuals and families and those who were 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.

In PY2024, the City of Biloxi also continued to support public and private agencies that addressed housing, health, public services, employment, education and youth needs by endorsing their applications for funding assistance and providing technical assistance, as feasible, with the City's limited staff and resources. The City also continued to support Biloxi Housing Authority's ongoing Community and Supportive Services activities and programs.

**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 PY2024, the City encouraged local faith-based organizations and MS-503 CoC member agencies to provide services to expand access of homeless persons, especially chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth, to existing affordable housing through rent, utility and security deposit assistance.

During the COVID pandemic, the City budgeted 100% of its first allocation of CDBG-CV funds for a rent assistance program administered by its subrecipient, the Open Doors Homeless Coalition, with the goal of addressing existing homelessness and preventing increased homelessness as a result of COVID-19. The program offered up to six consecutive months of rent assistance on behalf of qualified Biloxi residents. In PY2023 and PY2024, the City also supported efforts of MS-503 CoC and its member agencies to prevent repeat homelessness through ongoing case management assessments and services that included providing access to workforce training, educational advancement and life skills development.

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

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

The City of Biloxi continued working with the Biloxi Housing Authority during PY204 to maintain on-going communication regarding local efforts to meet residents' affordable housing needs, based on available resources. Examples of collaborative actions include conducting the annual fair housing education workshop hosted by the City, BHA and the Mississippi Center for Justice and development of the City of Biloxi - Biloxi Housing Authority 2019 Analysis of Impediments to Fair Housing Choice.

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

The Biloxi Housing Authority continued to support its Resident Councils and the Family Self Sufficiency (FSS) Program to encourage public housing residents to become more involved in management and participate in home ownership. In PY2024, the City and BHA continued to work collaboratively to encourage public housing residents to attend CDBG-related public hearings as well as the annual fair housing education workshop.

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

Not applicable to the Biloxi Housing Authority.

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

**Actions taken to remove or ameliorate the negative effects of public policies that serve as barriers to affordable housing such as land use controls, tax policies affecting land, zoning ordinances, building codes, fees and charges, growth limitations, and policies affecting the return on residential investment. 91.220 (j); 91.320 (i)**

Biloxi's official zoning district map allows for a mixture of single- and multi-family residential units on varying lot sizes throughout the City as well as group homes in a variety of areas. Land use regulations support sustainability measures and provide for density bonuses when combined with natural resource preservation and/or other public benefits. Mixed use zoning is permitted in the central business area.

The City has adopted the latest version of the International Building Code, which requires compliance with Americans with Disabilities Act and Fair Housing Act provisions. There are no specific growth limitations or other public policies in place that would affect return on residential investment. Unlike construction costs and insurance premiums, property taxes in Biloxi have not increased during the last 25 years.

The City was successful in its effort to have three areas in East Biloxi federally-designated as Opportunity Zones, providing the private sector with financial incentives to invest in these primarily low- to moderate-income areas.

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

In PY2024, the City continued working with other local units of government, faith-based institutions and area nonprofits to share information regarding the needs of underserved populations as part of its overall effort to encourage increased private support to address those needs. The City continued to work with local nonprofit agencies to meet high priority needs, such as assisting Moore Community House identify and secure suitable facilities to support expansion of affordable daycare services. The City also continued to work with the Catholic Diocese of Biloxi, Back Bay Mission, the Salvation Army and other nonprofit agencies to identify a site or sites for development or redevelopment to support an emergency homeless shelter and homeless assessment center facility.

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

During PY2024, the City of Biloxi shared information with residents, developers and others about lead-based paint poisoning (LBP) hazards through free information brochures available at City Hall and in the Building Division of the Community Development Department. The City continued to support the educational outreach efforts of the Mississippi State Department of Health and Harrison County Health Department, which administer the Healthy Homes Program and re-enforce awareness of the serious health hazard LBP poses, particularly to children under the age of six and pregnant women. All of the Biloxi Housing Authority's housing units have been assessed and, where required, LBP hazards have been abated.

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

The City of Biloxi continued on-going efforts to recruit new and expanding businesses to help it achieve the community goal identified in its 2020-2024 Consolidated Plan to expand employment opportunities and reduce the number of poverty-level families.

While no official programs or policies have been adopted, the current administration has an informal “open door” policy that encourages potential developers and existing business and industry leaders to meet individually and as groups with the Mayor, CAO and employees responsible for various steps of the local development process. The City also enlists the assistance of the two Chambers of Commerce and the Gulf Coast Business Council to identify growth opportunities to improve residents’ quality of life by enhancing their living environments and expanding the tax base rather than raising taxes.

During PY2024, the City continued to encourage residents, especially poverty-level families, to explore resources and services available through many local organizations, including The Salvation Army-Biloxi, Back Bay Mission, Loaves and Fishes, programs funded by the United Way of South Mississippi, and the Gulf Coast Community Action Agency (GCCAA).

The GCCAA offers income-eligible residents assistance paying rent, utility and deposit fees and provides opportunities for improving workforce skills and finding employment. The GCCAA also helps low-income residents, including senior citizens and those with disabilities, apply for other non-profit resources and assistance programs to address specific needs.

As in previous years, the City continued in PY2024 to support participation of the Biloxi Housing Authority in the HUD/HCV/FSS Program to help reduce the number of poverty-level families in Biloxi.

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

Through its participation as an active member of the MS-503 Continuum of Care, the City was informed about programs and services provided by area nonprofit agencies and organizations in PY2024. The City maintained ongoing communication with the Biloxi Housing Authority, public housing residents, the Biloxi Catholic Diocese, local nonprofit agencies and other local units of government as part of the City’s ongoing effort to encourage development and implementation of rental housing assistance programs to improve access of low- to moderate-income households to Biloxi’s existing housing stock and to address homelessness.

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

In PY2024, the City continued to lead by example to enhance coordination between local and regional public and private housing and social service agencies. As an active supporter of the Open Doors Homeless Coalition, lead for the MS-503 CoC, the City of Biloxi participated in the annual January Point-In-Time (PIT) Count. It also continued working with the Biloxi Catholic Diocese to operate its property at the former Mercy Cross School site as a homeless shelter for the unsheltered in Biloxi.

In addition to using General Funds for a Downtown Redevelopment Incentive Program that provides one-time direct grants of \$25,000 per housing unit to reuse/redevelop commercial properties or vacant lots into additional downtown housing, the City also financially supported Back Bay Mission's housing rehabilitation program for low-income residents and the Gulf Coast Center for Nonviolence's emergency shelter, housing supportive services and transitional housing assistance programs to prevent those escaping domestic violence from becoming homeless. In PY2024, the City also supported scholarships for children in low- to moderate-income households with a General Fund contribution, allowing them to participate in programs and recreational activities at the Salvation Army-Biloxi's Kroc Community Center.

City staff also maintains ongoing communications with the Biloxi Housing Authority, Habitat for Humanity of the Gulf Coast and other public and private housing agencies to support development and redevelopment of affordable housing, for purchase and/or rent that is not located in flood-prone areas and is adapted to support special needs populations.

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

The City's efforts to address the need for ongoing fair housing education, identified as an impediment in its 2019 A.I., includes cosponsoring an annual Fair Housing Workshop with the Mississippi Center for Justice (MCJ) and Biloxi Housing Authority that generally is well attended by residents, realtors and lending institution employees. The 2024 workshop was marketed through a notice in the City's monthly newsletter, mailed to the approximately 25,000 households and businesses with a City water account, mailed to public and private housing and social services agencies and through fliers posted in several public locations throughout the City.

In addition to posting Fair Housing Posters available through various federal sources, the City of Biloxi continued to provide no-cost Fair Housing brochures at City Hall, the permit desk in the Building Division and in the Engineering Department as a concise, affordable tool for improving awareness of the rights of those identified in the Fair Housing Act as "protected classes" and providing information about how to file a fair housing complaint.

**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**

Throughout PY2024, the City complied with existing policies and procedures that support self-monitoring of CDBG program administration and regulatory compliance and maintained on-going communication with the HUD Jackson Field Office and its CPD representative. To ensure comprehensive CDBG Entitlement Program compliance, the staff monitored 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. Expenditures were monitored throughout implementation of each project/activity on an on-going effort to comply with HUD's timeliness of expenditures requirements and with project budgets, as well as to eliminate opportunity for mismanagement, fraud and waste.

Staff performed ongoing desk reviews supported by monthly reports, emails and telephone conversations, in compliance with Biloxi's SOPs for CDBG subrecipients. While no corrective actions were required in PY2024, the City complies on an on-going basis with its SOP to take corrective action as soon as an issue becomes apparent to minimize compliance issues and opportunities for misuse of funds.

City staff participated in on-going HUD-sponsored webinars and incorporated HUD guidance into its programs and operating procedures throughout PY2024. The staff also regularly reviewed the HUD Exchange website for new resources, guidance and program compliance updates.

As part of its formal annual performance assessment, the City conducted a public hearing to inform the public of progress made toward implementing and completing CDBG-funded projects and activities in Program Year 2024. City compliance with applicable federal regulations and policies also was discussed at each CDBG public hearing, including comprehensive planning and timeliness of expenditures. Through 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 worked to comply with minority business outreach requirements.

The City's outreach to minorities and women also continued to include posting information in English, Spanish and Vietnamese on the City's website and in public buildings located throughout the City and also at Biloxi Housing Authority housing sites.

**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 complied with its Citizen Participation Plan requirements by making every effort to encourage broad public input into development of activities and programs assisted with CDBG Entitlement Program resources. The City of Biloxi published, posted and delivered notices in English, Spanish and Vietnamese to the Biloxi Housing Authority and all four branches of the Harrison County Library System located in Biloxi. All CDBG-related flyers and notices invited and encouraged the participation of all residents into the CDBG process through submission of oral and written comments.

The City of Biloxi also made its Consolidated Annual Performance and Evaluation Report (CAPER) draft available to the public for review and comment for more than the minimum required 15-day period and notified the public about the report's availability for review on its website, in a notice published both in the local newspaper and in the monthly B-mail newsletter, which is mailed by the first of each month to an estimated 25,000 households and businesses in Biloxi, in addition to posting notices in public buildings. Hard copies of the CAPER were distributed to the four branches of the Public Library, the Biloxi Housing Authority, the Mayor's Office, City Hall, the Community Development Department and the Public Works/Engineering Building. The CAPER notices identified where the public review copies were located.

On November 12, 2025, the City of Biloxi conducted its PY2024 CAPER public hearing, after having advertised it in the local newspaper and the City's monthly B-mail publication, and posted notices as described above. All notices included information about the availability of the Public Review Draft of the 2024 CAPER, identified the dates of the 15-day comment period and encouraged attendance at the public hearing. Published and posted notices also identified specific information about how to submit written comments by delivering, emailing or mailing them to the Biloxi Federal Programs Office.

No residents or other interested parties attended the November 12, 2025 hearing and \_\_\_\_ written comments were submitted to the City for consideration during the designated written comment period (number to be inserted following the December 1, 2025 deadline for submittal of written comments). Compliance with the Biloxi Citizen Participation Plan is documented in the attachment at screen CR-00 Administration (in IDIS).

## 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.**

The City has not identified any CDBG program changes as a result of its experiences during PY2024. As a result of successful implementation of past activities and projects, the City plans to continue developing its Annual Action Plan with considerable input from residents and funding projects and activities that address high-priority, unmet needs identified in its Five-Year Consolidated Plan.

**Does this Jurisdiction have any open Brownfields Economic Development Initiative (BEDI) grants?  
[BEDI grantees] Describe accomplishments and program outcomes during the last year.**

No  
Not Applicable

## CR-58 – Section 3

**Identify the number of individuals assisted and the types of assistance provided**

| <b>Total Labor Hours</b>              | <b>CDBG</b> | <b>HOME</b> | <b>ESG</b> | <b>HOPWA</b> | <b>HTF</b> |
|---------------------------------------|-------------|-------------|------------|--------------|------------|
| Total Number of Activities            | 0           | 0           | 0          | 0            | 0          |
| Total Labor Hours                     | 0           |             |            |              |            |
| Total Section 3 Worker Hours          | 0           |             |            |              |            |
| Total Targeted Section 3 Worker Hours | 0           |             |            |              |            |

**Table 5 – Total Labor Hours**

| <b>Qualitative Efforts - Number of Activities by Program</b>                        | <b>CDBG</b> | <b>HOME</b> | <b>ESG</b> | <b>HOPWA</b> | <b>HTF</b> |
|-------------------------------------------------------------------------------------|-------------|-------------|------------|--------------|------------|
| Outreach efforts to generate job applicants who are Public Housing Targeted Workers |             |             |            |              |            |
| Outreach efforts to generate job applicants who are Other Funding Targeted Workers. |             |             |            |              |            |
| Direct, on-the job training (including apprenticeships).                            |             |             |            |              |            |

|                                                                                                                                                                                                         |  |  |  |  |  |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--|--|--|--|--|
| Indirect training such as arranging for, contracting for, or paying tuition for, off-site training.                                                                                                     |  |  |  |  |  |
| Technical assistance to help Section 3 workers compete for jobs (e.g., resume assistance, coaching).                                                                                                    |  |  |  |  |  |
| Outreach efforts to identify and secure bids from Section 3 business concerns.                                                                                                                          |  |  |  |  |  |
| Technical assistance to help Section 3 business concerns understand and bid on contracts.                                                                                                               |  |  |  |  |  |
| Division of contracts into smaller jobs to facilitate participation by Section 3 business concerns.                                                                                                     |  |  |  |  |  |
| Provided or connected residents with assistance in seeking employment including: drafting resumes, preparing for interviews, finding job opportunities, connecting residents to job placement services. |  |  |  |  |  |
| Held one or more job fairs.                                                                                                                                                                             |  |  |  |  |  |
| Provided or connected residents with supportive services that can provide direct services or referrals.                                                                                                 |  |  |  |  |  |
| Provided or connected residents with supportive services that provide one or more of the following: work readiness health screenings, interview clothing, uniforms, test fees, transportation.          |  |  |  |  |  |
| Assisted residents with finding child care.                                                                                                                                                             |  |  |  |  |  |
| Assisted residents to apply for, or attend community college or a four year educational institution.                                                                                                    |  |  |  |  |  |
| Assisted residents to apply for, or attend vocational/technical training.                                                                                                                               |  |  |  |  |  |
| Assisted residents to obtain financial literacy training and/or coaching.                                                                                                                               |  |  |  |  |  |
| Bonding assistance, guaranties, or other efforts to support viable bids from Section 3 business concerns.                                                                                               |  |  |  |  |  |
| Provided or connected residents with training on computer use or online technologies.                                                                                                                   |  |  |  |  |  |
| Promoting the use of a business registry designed to create opportunities for disadvantaged and small businesses.                                                                                       |  |  |  |  |  |
| Outreach, engagement, or referrals with the state one-stop system, as designed in Section 121(e)(2) of the Workforce Innovation and Opportunity Act.                                                    |  |  |  |  |  |
| Other.                                                                                                                                                                                                  |  |  |  |  |  |

**Table 8 – Qualitative Efforts - Number of Activities by Program**

## Narrative

In PY2024, no construction took place for any CDBG-funded projects subject to Section 3 compliance.

The construction contract for Phase III of the East Biloxi East-West Neighborhood Access Road Project is anticipated to be bid in the first quarter of PY2025 and will include information about Section 3 requirements in the bid specifications.

**Final document to be submitted to HUD will include the following attachments:**

**Citizen Outreach and Participation**

**IDIS Reports**