

CITY OF STAUNTON, VIRGINIA

2020 Annual Action Plan

EXECUTIVE SUMMARY

AP-05 EXECUTIVE SUMMARY - 24 CFR 91.200(C), 91.220(B)

1. Introduction

The City of Staunton is a federal entitlement community under the U.S. Department of Housing and Urban Development (HUD). As a HUD entitlement community, the City is required to prepare Annual Action Plans related to the most recent Five-Year Consolidated Plan (CP) in order to implement any federal programs that fund housing, community development and economic development within the community. The Staunton Annual Action Plan covers the period from FY 2020 (October 1, 2020 through September 30, 2021).

This Annual Action Plan outlines the planning and project requirements for the following federal program:

- Community Development Block Grant (CDBG)

Funds are provided under the following program:

- Community Development Block Grant (CDBG): The primary objective of the CDBG Program is to develop viable urban communities by providing decent housing, a suitable living environment, and economic opportunities, principally for persons of low- and moderate-income levels. Funds can be used for a wide array of activities, including: housing rehabilitation, acquisition of existing housing or land, homeownership assistance, lead-based paint detection and removal, construction or rehabilitation of public facilities and infrastructure, removal of architectural barriers, water and efficiency improvements, abatement of hazards such as lead based paint or asbestos, public services, rehabilitation of commercial or industrial buildings, and loans or grants to businesses.

2. Summarize the objectives and outcomes identified in the Plan

The Strategic Plan provides a framework to address the needs of the City for the next four years. The Three overarching objectives guiding the proposed activities are:

- Providing Decent Affordable Housing
- Creating Suitable Living Environments
- Creating Economic Opportunities

Outcomes show how programs and activities benefit low- and moderate- income areas of a community or the people served. The three outcomes that will illustrate the benefits of each activity funded by the CDBG programs are:

- Improve Availability/Accessibility
- Improve Affordability
- Improve Sustainability

All future activities funding in the next four years will support at least one objective and one outcome. The City's framework for realizing the objectives and outcomes include the following goals:

- Provide Decent, Affordable Housing
- Provide a Suitable Living Environment
- Increase Homeownership

3. Evaluation of past performance

The City of Staunton was designated a federal entitlement community in Program Year 2019, which ends on September 30, 2020, therefore there is no evaluation of past performance available at this time.

4. Summary of Citizen Participation Process and consultation process

During April 2020, the City of Staunton updated the Citizen Participation Plan to include information on how the City will collect citizen participation in the event of an emergency. During the development of the Annual Action Plan, the state of Virginia was under stay at home orders and could not hold public hearings. The City of Staunton conducted public hearings virtually, utilizing video conferencing software that had the ability to allow live questions be asked and comments in real time.

Public Hearings—A virtual public hearing was held on June 9, 2020 to solicit feedback on the Annual Action Plan development. This hearing was to solicit input from the public on the needs and priorities for the City. One person was in attendance.

A second public hearing was held virtually on July 23, 2020 during a City Council meeting. This hearing was a presentation to City Council to present the draft Annual Action Plan and make a recommendation the Council adopt it. Both hearings were advertised in the *News Leader* and on the City's website in accordance with the City's Citizen Participation Plan.

5. Summary of public comments

[complete after public comment period]

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

All comments were accepted. A complete summary of comments received is included in the Citizen Participation Appendix.

7. Summary

The City of Staunton continues to use CDBG funding to support at least one objective and one outcome. The City's framework for realizing the objectives and outcomes include the following goals, provide decent, affordable housing, provide a suitable living environment and/or increase homeownership.

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

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

Agency Role	Name	Department/Agency
CDBG Administrator	City of Staunton, VA	Department of Community and Economic Development

Table 1 – Responsible Agencies

Narrative (optional)

The City, a relatively new designated HUD entitlement grantee, is required by HUD to prepare an Annual Action Plan that meets the Consolidated Plan regulations in order to receive grant program funds. The lead agency responsible for overseeing the development of these plans and reports is the City's Community and Economic Development Departments.

Consolidated Plan Public Contact Information

Mr. William L. Vaughn, Director
Community and Economic Development Departments
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Staunton, VA 24401
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1. Introduction

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

As a new Entitlement grantee, the City encouraged a high level of public communication and agency consultation when developing the 2019-2023 Consolidated Plan to demonstrate its commitment to identifying priority needs and engaging the participation of citizens, public agencies, and nonprofit organizations in a positive and collaborative manner. A list of stakeholders was developed for the purpose of developing the Plan, and included affordable housing providers, public agencies and private nonprofit organizations whose missions include the provision of affordable housing and human services to LMI households and persons. In line with the process during the Consolidated Plan, these stakeholders were invited to participate in group interviews held to develop the 2020 Annual Action Plan.

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

The City participates in the Virginia Balance of State Continuum of Care (CoC) and is a member of one of twelve local planning groups. This group encompasses the City of Staunton, Augusta County, the City of Waynesboro, Highland County, the City of Lexington, the City of Buena Vista, and Rockbridge County. Members of the CoC were consulted during the development of the Con Plan to understand how to best address the needs of homeless persons and persons at risk of homelessness. Through its cooperation with the CoC, the City will seek to identify ways to enhance coordination among the assisted housing providers and governmental health, mental health, and service agencies.

The City anticipates continuing its coordination of human service funding with other social service agencies and charitable organizations to better target the limited amount of human service dollars available in the community.

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

City staff will continue to work with the local planning group of the Balance of State CoC to undertake the establishment of performance measurements for homeless programs. Members of the CoC provided

valuable input during public outreach, plan drafting, and project selection process of the Con Plan. The CoC administers the local HMIS.

The City's Citizen Participation Plan allows for citizens, community agencies, and the local CoC to provide input on the use of all funding. Notifications of the public hearings are published in Staunton's newspaper of largest distribution, the *News Leader*. Information is also made available at the City's office of Community Development and is displayed on the City's website.

The City does not receive ESG funds.

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

1	Agency/Group/Organization	Renewing Homes Augusta
	Agency/Group/Organization Type	Services-Low-income Households
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Economic Development
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	This organization was consulted through a stakeholder meeting and brought several community needs to the attention of City staff that have been incorporated into the plan. Please see the Citizen Participation Appendix for summaries of all stakeholder interviews/workshops.
2	Agency/Group/Organization	United Way of Greater Augusta
	Agency/Group/Organization Type	Services-Children Services-Health Services-Education
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Public Housing Needs Homelessness Strategy Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Non-Homeless Special Needs

	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	This organization was consulted through a stakeholder meeting and brought several community needs to the attention of City staff that have been incorporated into the plan. Please see the Citizen Participation Appendix for summaries of all stakeholder interviews/workshops.
3	Agency/Group/Organization	STAUNTON REDEVELOPMENT AND HOUSING AUTHORITY
	Agency/Group/Organization Type	PHA
	What section of the Plan was addressed by Consultation?	Public Housing Needs
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	This organization was consulted through a stakeholder meeting and brought several community needs to the attention of City staff that have been incorporated into the plan. Please see the Citizen Participation Appendix for summaries of all stakeholder interviews/workshops.
4	Agency/Group/Organization	City of Staunton - Parks & Recreation Department
	Agency/Group/Organization Type	Other government - Local
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Economic Development Market Analysis
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	This municipal department was consulted through a stakeholder meeting and brought several community needs to the attention of City staff that have been incorporated into the plan. Please see the Citizen Participation Appendix for summaries of all stakeholder interviews/workshops.
5	Agency/Group/Organization	City of Staunton – Community and Economic Development
	Agency/Group/Organization Type	Other government - Local
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Economic Development Market Analysis
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	This municipal department was consulted through a stakeholder meeting and brought several community needs to the attention of City staff that have been incorporated into the plan. Please see the Citizen Participation Appendix for summaries of all stakeholder interviews/workshops.

6	Agency/Group/Organization	VPAS
	Agency/Group/Organization Type	Services-Elderly Persons
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Non-Homeless Special Needs
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	This organization was consulted through a stakeholder meeting and brought several community needs to the attention of City staff that have been incorporated into the plan. Please see the Citizen Participation Appendix for summaries of all stakeholder interviews/workshops.
7	Agency/Group/Organization	Valley Community Services Board
	Agency/Group/Organization Type	Services-Health
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Non-Homeless Special Needs
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	This organization was consulted through a stakeholder meeting and brought several community needs to the attention of City staff that have been incorporated into the plan. Please see the Citizen Participation Appendix for summaries of all stakeholder interviews/workshops.
8	Agency/Group/Organization	Staunton Augusta Habitat for Humanity
	Agency/Group/Organization Type	Services-Low-income Households
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Economic Development
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	This organization was consulted through a stakeholder meeting and brought several community needs to the attention of City staff that have been incorporated into the plan. Please see the Citizen Participation Appendix for summaries of all stakeholder interviews/workshops.
9	Agency/Group/Organization	Community Foundation of Central Blue Ridge
	Agency/Group/Organization Type	Community Foundation
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Economic Development Market Analysis
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	This organization was consulted through a stakeholder meeting and brought several community needs to the attention of City staff that have been incorporated into the plan. Please see the Citizen Participation Appendix for summaries of all stakeholder interviews/workshops.

10	Agency/Group/Organization	Valley Supportive Housing
	Agency/Group/Organization Type	Homeless
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homelessness Strategy Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Non-Homeless Special Needs
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	This organization was consulted through a stakeholder meeting and brought several community needs to the attention of City staff that have been incorporated into the plan. Please see the Citizen Participation Appendix for summaries of all stakeholder interviews/workshops.
11	Agency/Group/Organization	Blue Ridge CASA
	Agency/Group/Organization Type	Services-Children
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homeless Needs - Families with children Homelessness Needs - Unaccompanied youth Non-Homeless Special Needs
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	This organization was consulted through a stakeholder meeting and brought several community needs to the attention of City staff that have been incorporated into the plan. Please see the Citizen Participation Appendix for summaries of all stakeholder interviews/workshops.

Table 2 – Agencies, groups, organizations who participated

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

All entities were considered for consultation. The City of Staunton attempted to reach out to broadband providers. Data was collected using Federal Communications Commission data. Hazard mitigation information was collected from the Central Shenandoah Planning District Commission's website.

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

Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
ALICE Report United Way	United Way Greater Augusta	The ALICE Report was developed to identify challenges faced by the "working poor," those who are employed and/or have income, are above the federal poverty guidelines, but still have difficulty achieving basic needs. The goals of the Strategic Plan are aligned with the goals of ALICE, to improve access to opportunity for Staunton residents.
Capital Improvement Plan	City of Staunton	The City's Capital Improvement Plan, updated in 2018, informed the Strategic Plan sections aimed at public infrastructure improvements.

Table 3 – Other local / regional / federal planning efforts

1. Summary of citizen participation process/Efforts made to broaden citizen participation

Summarize citizen participation process and how it impacted goal-setting

During April 2020, the City of Staunton updated the Citizen Participation Plan to include information on how the City will collect citizen participation in the event of an emergency. During the development of the Annual Action Plan, the state of Virginia was under stay at home orders and could not hold public hearings. The City of Staunton conducted public hearings virtually, utilizing video conferencing software that had the ability to allow live questions to be asked and comments in real time

Public Hearings—A virtual public hearing was held on June 9, 2020 to solicit feedback on the Annual Action Plan development. This hearing was to solicit input from the public on the needs and priorities for the City. 1 person in attendance and no comments were made.

A second public hearing was held on July 23, 2020 during a City Council meeting. This hearing was a presentation to City Council to present the draft Annual Action Plan and make a recommendation the Council adopt it. Both hearings were advertised in the *News Leader* and on the City's website in accordance with the City's Citizen Participation Plan.

The City underwent extensive citizen participation in the development of the Consolidated Plan in 2019, which included stakeholder meetings, public hearings and an online survey. Results from this process outlined the five-year strategic goals for the City of Staunton. These were used in the creation of the 2020 Annual Action Plan.

Citizen Participation Outreach

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
1	Public Meeting	Non-targeted/broad community	1 participant	No comments	All comments accepted.	
2	Online	Non-targeted/broad community	Annual Action Plan was uploaded on the City's website during the 30-day public comment period.	n/a	n/a	https://www.ci.staunton.va.us/departments/community-development/development-block-grant/notice-of-public-needs-hearing
3	Public Hearing	Non-targeted/broad community	[complete after hearing]			

Table 4 – Citizen Participation Outreach

EXPECTED RESOURCES

AP-15 EXPECTED RESOURCES – 91.220(C)(1,2)

Introduction

The City of Staunton will utilize the CDBG allocation for Program Year 2020 for Acquisition, Admin and Planning, Economic Development, Housing, Public Improvements, and/or Public Services.

Anticipated Resources

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
CDBG	Public-federal	Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services	\$352,891			\$352,891	\$1,058,673	The estimated expected amount available for the remainder of the Con Plan is three times the 2020 annual allocation

Table 5 - Expected Resources – Priority Table

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

Over the next four years, Staunton will attempt to leverage its CDBG allocations with federal and other public resources, as well as private sector funding sources, to address the City's housing and community development needs. The City will continue to partner with other public agencies and non-profit organizations, when feasible, to leverage resources and maximize

outcomes in providing the housing and supportive services needs of the community.

The City annually provides general fund dollars to organizations that provide housing and/or supportive services to area residents, including LMI households. The City will continue this practice to maximize its CDBG investments.

The non-profit organizations funded through the CDBG program have additional financial capacity through foundations, fundraising campaigns, and other grants. The City's allocation of federal funds provides these organizations with the opportunity to expand their services to benefit more low- and moderate-income persons.

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

The Staunton Crossing redevelopment site is publicly owned and could potentially be used to address economic development and infrastructure needs identified in the Plan. Some of the needs identified that are needs of this particular site, but also the City as a whole, that can be addressed by the continued development of the site include infrastructure improvements and workforce development needs/middle-high paying jobs.

ANNUAL GOALS AND OBJECTIVES

AP-20 ANNUAL GOALS AND OBJECTIVES

Goals Summary Information

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	Improve access to and quality of housing	2019	2023	Affordable Housing	Citywide	Affordable Housing	CDBG: \$229,379.15	Units
2	Provide public service	2019	2023	Non-Homeless Special Needs	Citywide	Public Services	CDBG: \$52,933.65	People
3	Improve public facilities and infrastructure	2019	2023	Non-Housing Community Development	Citywide	Public Facilities and Infrastructure		People
4	Economic Development	2019	2023	Non-Housing Community Development	Citywide	Economic Development		Businesses
5	Planning and Administration	2019	2023	Other	Citywide	Economic Development	CDBG: \$70,578.20	Other

Table 6 – Goals Summary

Goal Descriptions

Goal Name	Improve access to and quality of housing
Goal Description	Includes the rehabilitation and preservation of quality affordable housing as well as increasing access to homeownership through City initiatives and partnerships with SR&HA.
Goal Name	Provide public services
Goal Description	Expand and continue non-housing community development supportive services, including services for the homeless, mental health, elderly and other special needs populations.

Goal Name	Improve public facilities and infrastructure
Goal Description	Continue and expand public facility improvements and improve and maintain infrastructure servicing households in low-income areas.
Goal Name	Economic Development
Goal Description	Provide loan and technical assistance to small businesses to promote the creation and retention of jobs in the City of Staunton.
Goal Name	Planning and Administration
Goal Description	Includes administration of the CDBG program, planning activities and activities to affirmatively further fair housing choice.

DRAFT

PROJECTS

AP-35 PROJECTS – 91.220(D)

Introduction

The following project information for the FY2020 provides a comprehensive overview of CDBG activities.

Projects

#	Project Name
1	Public Services
2	CDBG Program Administration
3	Affordable Housing, Public Facilities, Public Infrastructure, Economic Development

Table 7 - Project Information

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

The City of Staunton has directed its FY 2020 CDBG activities to low/moderate income neighborhoods where concentrations of poverty, deteriorated infrastructures and community facilities, and poor housing conditions are most prevalent.

The following are obstacles to meeting underserved needs in the City:

- The reduction of funding at the local, state, and federal levels will significantly limit the resources available to meet the needs of low- and moderate- income residents. With declining resources from various sources, the City and non-profit organizations will be unable to serve all persons who are in need of services.

As the population of Staunton continues to grow, continuing limitations on affordable housing will become a major barrier.

Project Summary Information

1	Project Name	Public Services
	Target Area	Citywide
	Goals Supported	Provide Public Services
	Needs Addressed	Public Services
	Funding	CDBG: \$52,933.65
	Description	Activities will provide public services to low to moderate income households in the City of Staunton. Special needs populations can include seniors, abused children, disabled adults, homeless persons, persons with AIDS, and/or illiterate adults.
	Target Date	9/30/2022
	Estimate the number and type of families that will benefit from the proposed activities	The activities will directly benefit low to moderate income people.
	Location Description	Citywide
	Planned Activities	Public services TBD
2	Project Name	Affordable Housing, Public Infrastructure, Public Facilities and/or Economic Development
	Target Area	Citywide
	Goals Supported	
	Needs Addressed	
	Funding	CDBG: \$229,379.15
	Description	The City of Staunton may utilize CDBG funding for Acquisition, Economic Development, Rehabilitation of Housing and/or Public Improvements
	Target Date	09/30/2022
	Estimate the number and type of families that will benefit from the proposed activities	TBD
	Location Description	City Wide
	Planned Activities	TBD
10	Project Name	Administration
	Target Area	Citywide

Goals Supported	Planning and administration
Needs Addressed	Planning and Administration
Funding	CDBG: \$70,578.20
Description	This funding will be used to support the general administration and planning activities for the Community Development Block Grant Program.
Target Date	9/30/2022
Estimate the number and type of families that will benefit from the proposed activities	Other
Location Description	Citywide
Planned Activities	This funding is used to support the general administration and planning activities for the Community Development Block Grant Program.

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

Geographic Distribution

Target Area	Percentage of Funds
Citywide	100%

Table 8 - Geographic Distribution

Rationale for the priorities for allocating investments geographically

Staunton does not allocate funds by target areas. Rather, the City allocates funds based upon the priorities that have been identified by citizens participating in the public input process and through the regular planning contacts made with elected officials and staff. The City will use CDBG funds throughout the jurisdiction to serve low and moderate-income persons.

AFFORDABLE HOUSING

AP-55 AFFORDABLE HOUSING – 91.220(G)

Introduction

The City will use its federal funds to provide affordable housing by providing funds to rehabilitation existing units.

The special needs population will be served through grants to local service providers. The homeless population will be served through assistance grants to local service providers.

One Year Goals for the Number of Households to be Supported	
Homeless	0
Non-Homeless	
Special-Needs	
Total	

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

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

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

Introduction

As of 2016, Staunton Redevelopment and Housing Authority (SR&HA) converted all of its public housing units into project-based Section 8 units under the Rental Assistance Demonstration Program. SR&HA currently owns and manages a total of 150 residential units including 50 units for elderly and disabled. The units range from one bedroom to five-bedroom townhouses. Rent is based on income and utilities are included.

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

SR&HA converted all of its public housing units into Section 8 units under the Rental Assistance Demonstration Program.

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

Staunton Redevelopment and Housing Authority (SR&HA) has a resident council that participates in meetings and events. The Council was particularly active during the conversion of the units to project-based vouchers under the Rental Assistance Demonstration program in 2016.

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

SR&HA is not designated as troubled.

Introduction

As a participant in the Virginia Balance of State Continuum of Care (CoC), the City is a partner in addressing homelessness and the priority needs of homeless individuals and families, including homeless subpopulations.

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

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

The Balance of State Continuum of Care (BoS CoC) has an established Coordinated Entry System, which offers a central point of entry for households experiencing homelessness or at-risk of homelessness. During an initial phone call, a housing counselor asks questions that will help determine eligibility for services with local agencies. The BoS CoC uses two assessment tools for prioritization of services. Prevention assessment: The BoS created a prevention prioritization tool that includes both homeless vulnerability and housing barriers. Once a household's housing crisis is triaged and it is determined that the household is at imminent risk of homeless (14 days or less), then the coordinated entry staff will conduct the prevention prioritization assessment. Based on eligibility and assessment score prevention providers are guided on service needs of households. The BoS CoC uses the Vulnerability Index - Service Prioritization Decision Assistance Tool (VI-SPDAT) as the common standardized assessment tool for those who are literally homeless. This assessment is conducted no more than 3 to 5 days after the household has been referred to shelter or once an outreach worker is able to establish rapport with an unsheltered or un-engaged household.

Each January, the CoC conducts a Point-in-Time (PIT) count of the City's sheltered and unsheltered homeless to ascertain the number and characteristics of the homeless population and to assess their needs. Staunton's continued participation in the PIT study will give the City the ability to collect information to be used in setting priorities, written standards, and performance measures for the area.

Addressing the emergency shelter and transitional housing needs of homeless persons

During 2020, the City's federal funds will support the Valley Mission and Valley Supportive Housing Program. The former offers emergency shelter and services for homeless individuals and families while the latter provides permanent supportive housing and wraparound services for

the same population.

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

The City will maintain coordination and collaboration with local non-profit agencies serving the homeless population. The City will continue will use its entitlement grant funds to assist non-profit organizations that serve homeless individuals and families in Staunton. During 2019, the City awarded CDBG funds for the creation of permanent supportive housing units, which serve chronically homeless individuals with a mental health disability.

Valley Mission was also awarded CDBG funds for the use of financial and utility assistance for low to moderate income households exiting transitional housing or emergency shelters.

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

The City will maintain coordination and collaboration with local non-profit agencies serving the homeless population. The City will continue will use its entitlement grant funds to assist non-profit organizations that serve homeless individuals and families in Staunton.

The City utilized federal CARES Act funds support the following homeless shelter and prevention programs:

- Valley Mission
- Salvation Army Homeless Prevention
- Community Foundation of Blue Ridge Homeless Prevention

Introduction:

The City of Staunton has prepared an Analysis of Impediments to Fair Housing Choice to satisfy requirements of the Housing and Community Development Act of 1974, as amended, in 2020. This act requires that any community receiving Community Development Block Grant (CDBG) and Home Investment Partnership Program (HOME) funds affirmatively further fair housing.

A summary of the impediments to fair housing choice that emerged from the data analysis, public engagement initiatives, and policy review were identified. They are the results of primary and secondary research that define the underlying conditions, trends, and context for fair housing planning in Staunton. The impediments were assigned three priority levels based on the amount and strength of the supporting evidence that initially identified the factor:

- High – factors that limit or deny fair housing choice or access to opportunity, as well as other factors that are urgent or establish a foundation for future actions
- Medium – moderately urgent or building on prior actions
- Low – limited impact on fair housing issue

Factor	Priority	Responsible Parties	Discussion
Access to community assets and opportunities	High	City	Community assets such as public transit and jobs can improve access to opportunities, especially for lower income households and persons with disabilities. While the City has adequate coverage regarding public transit in R/ECAPs, these areas have poor access to the City's employment centers and higher performing schools. Expanding the public transit system to higher opportunity areas could increase opportunities for low- and moderate-income residents.
Location and type of affordable housing	High	City, SRHA, Private Sector	Providing more housing choices in more areas across the City could increase the accessibility and affordability of housing in Staunton. The majority of Staunton's housing stock is single-family housing (67.1%). Conversely, multi-family units comprised 32.8% of the total housing stock in Staunton. Multi-family housing can be a more affordable housing option that provides members of the protected classes access to other parts of the City that are otherwise unaffordable. Minority households are more likely to have four or more members in the household, requiring larger units. In order to house larger families, a sufficient supply of larger dwelling units consisting of three or more bedrooms is necessary. There has been a decrease in the number of 4-and 5-bedroom units in Staunton since 2010. Homeownership is also lower among non-white residents in Staunton.

Land use and zoning	Medium	City	The City of Staunton's zoning ordinance is at moderate risk relative to discriminatory provisions for housing members of the protected class. One concern with Staunton's zoning ordinance is the lack of a Reasonable Accommodations provision. Reasonable accommodation is a change in rules, policies and practices that enables persons with disabilities an equal opportunity to use and enjoy a dwelling.
Creation of Policy and Procedures related to Fair Housing	High	City	The City of Staunton is a new CDBG entitlement community and should develop several policies and procedures to support initiatives to affirmatively further fair housing.
Fair Housing Education and Outreach	High	City	There are many strategies that local governments can employ to increase fair housing choice for residents in their jurisdictions. Several best practices can help to ensure that residents are educated about their fair housing rights and that municipal officials and staff are aware of their fair housing responsibilities. Municipalities should make consumer information regarding fair housing rights available to their constituents.

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

Impediment	Action	Measurable Benchmarks	Timeframe
Location and type of affordable housing	The City and other local organizations should address the diverse housing needs for the City's various subpopulations, including low-and moderate-income households, persons with disabilities, and large families.	Continue investing in housing in a wide geographic area throughout the City. Number of affordable units created/rehabilitated by location and unit type.	Ongoing

	The City should expand affordable housing in areas of higher opportunities.		Ongoing
Lack of policies and procedures related to fair housing.	The City should create an Anti-Displacement and Relocation Plan in accordance with the Housing and Community Development Act of 1974, as amended; and HUD regulations at 24 CFR 42.325	Adoption of Anti-Displacement and Relocation Plan	2020
Fair housing education, outreach and enforcement	The City should include information about fair housing, including HUD's fair housing logo, and information such as: • What is fair housing? • What is housing discrimination? • Who is protected under fair housing laws (all levels of jurisdiction)? • What are some examples of housing discrimination? • How do I file a complaint? The website should also include the name and contact information of the City's designated Fair Housing liaison. Designate a City department/staff liaison for Fair Housing and provide its contact information on the Fair Housing webpage.	Completion of new, fair housing webpage on City's website. Designation of Fair Housing liaison, with contact info displayed on City's new Fair Housing webpage.	2020-2021 2020-2021

Introduction:

The following information illustrates other actions that Staunton will take to address its priority needs.

Actions planned to address obstacles to meeting underserved needs

The primary impediment to the City's ability to meet underserved needs is the limited amount of funding to address identified priorities. The City will continue to seek public and private resources to leverage its entitlement funds in assisting with implementation of policies and programs.

Actions planned to foster and maintain affordable housing

The City will continue to support its goals of maintaining and expanding affordable housing. In FY 2020 the City will allocate CDBG funds to increase access to and the creation of affordable housing.

Actions planned to reduce lead-based paint hazards

The City will work with other parties to achieve cost effective methods for controlling these hazards through the following:

- As part of its code enforcement efforts, Staunton's building code department will continue to educate City residents about lead paint hazards.
- Properties will be made lead safe during renovation of older residential units.
- The City will continue to monitor Virginia Department of Health reports regarding Staunton children with elevated blood lead levels.

Actions planned to reduce the number of poverty-level families

The City will collaborate with human service, social service, and economic development agencies and organizations to facilitate their efforts and maximize their resources to provide quality services to low-income residents to help them improve their incomes.

Actions planned to develop institutional structure

Although the City feels that the existing institutional structure is sufficient for carrying out activities to address identified community development needs, the City Manager's Office plans to continue to strengthen its working relationships with local social service agencies. Public and non-profit agencies that are critical to the institutional structure must work cooperatively, and

agency staff have the ability and expertise to deliver services efficiently and effectively, often with years of expertise in their respective fields.

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

The City plans to improve coordination among its partners to promote a broadly shared understanding of community needs, collaborative and complementary approaches to addressing needs, and responsiveness to changes in conditions.

The City anticipates coordination of human service funding with other social service agencies and charitable organizations to better target the limited amount of human service dollars available in the community. The City will also continue to coordinate its housing efforts with the Staunton Redevelopment and Housing Authority (SR&HA).

PROGRAM SPECIFIC REQUIREMENTS

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

Introduction:

The City of Staunton has been an Entitlement Community for one year. There is no program income carried over from the previous year and there are no Section 108 loan payments.

Community Development Block Grant Program (CDBG)

Reference 24 CFR 91.220(l)(1)

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

1. The total amount of program income that will have been received before the start of the next program year and that has not yet been reprogrammed	0.00
2. The amount of proceeds from section 108 loan guarantees that will be used during the year to address the priority needs and specific objectives identified in the grantee's strategic plan	0.00
3. The amount of surplus funds from urban renewal settlements	0.00
4. The amount of any grant funds returned to the line of credit for which the planned use has not been included in a prior statement or plan.	0.00
5. The amount of income from float-funded activities	0.00
Total Program Income	0.00

Other CDBG Requirements

1. The amount of urgent need activities	0
2. The estimated percentage of CDBG funds that will be used for activities that benefit persons of low and moderate income.	70%