



CITY OF LEBANON

FY 2023 ANNUAL ACTION PLAN

**FOR SUBMISSION TO HUD FOR THE
COMMUNITY DEVELOPMENT BLOCK GRANT**

SHERRY L. CAPELLO, MAYOR

SUBMITTED BY:

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APRIL 2023

Executive Summary

AP-05 Executive Summary - 24 CFR 91.200(c), 91.220(b)

1. Introduction

The City's Community Development Office was the lead agency in developing the 2020-2024 Consolidated Plan (Plan). The Plan was prepared in accordance with HUD's Office of Community and Planning Development (CPD) eCon Planning Suite (launched in May 2012), including the Consolidated Plan template in IDIS (Integrated Disbursement and Information System). The research process involved the analysis of the following key components: demographic, economic, and housing data; affordable housing market; special needs populations (homeless and non-homeless); and consultation with public and private agencies, as well as citizen participation.

This Action Plan is the fourth-year of the 2020-2024 Consolidated Plan which is the annual plan the City prepares pursuant to the goals outlined in the Plan. The Action Plan details the activities the City will undertake to address the housing and community development needs and local objectives using CDBG funds received during program year 2023.

2. Summarize the objectives and outcomes identified in the Plan

This could be a restatement of items or a table listed elsewhere in the plan or a reference to another location. It may also contain any essential items from the housing and homeless needs assessment, the housing market analysis or the strategic plan.

The City has organized its priority needs according to the structure presented in HUD regulations (24 CFR 91.215): affordable housing, homelessness, and non-housing community development. Priority is assigned based on the level of need that is demonstrated by the data that has been collected during the preparation of the Plan, specifically in the Needs Assessment and Market Analysis; the information gathered during the consultation and citizen participation process; and the availability of resources to address these needs. Based on all of these components, housing needs are considered a high priority followed by homelessness and non-housing community development needs.

- Reducing housing blight and deterioration among owner households;
- Increase access to homeownership opportunities for City residents;
- Providing safe and accessible housing; and
- Providing funding for public facilities and improvements.

During the five-year Plan period, the City expects to receive approximately \$600,000 annually in CDBG funding, for a five-year total of \$3 million. CDBG Funds are used by the City for public services, housing activities, infrastructure improvements and administrative costs. The primary objective of the CDBG program is to develop viable urban community by providing decent housing, a suitable living environment, and economic opportunities, principally for persons of low- and moderate- income. Funds can be used for a wide array of activities, including; housing rehabilitation; homeownership assistance; lead-based paint detection and removal; construction or rehabilitation of public facilities and infrastructure; removal or architectural barriers; public services, rehabilitation of commercial or industrial buildings; blight removal and loans or grants to businesses.

3. Evaluation of past performance

This is an evaluation of past performance that helped lead the grantee to choose its goals or projects.

In the past, the City has made significant progress in meeting its housing and community development goals and priorities. A number of activities stand out as having a positive impact on improving the quality of life for the City's low- and moderate-income residents and the city at large. The success of these activities was considered in developing the current Consolidated Plan. Due to the lingering effects from the COVID-19 Pandemic, the City continues to work through many obstacles. While we have not always hit all of our goals in the past three-years of the Consolidated Plan as anticipated when the when it was created in 2019-2020, we have been able to created additional goals to address needs in the community due to the pandemic. Many goals that were anticipated to be completed in FY2022 will be completed in FY2023. Additionally, the City has rebudgeted funding from slow moving projects from past years that will be completed in FY 2023. Those projects include street improvements and emergency rehab projects. Since those projects will technically be completed in 2023, the City looked at additional projects that are needed in our community to address the goals identified in the 2020-2024 Consolidated Plan which included Affordable Housing, Blight Elimination and Non-housing Community Development. The City will continue working hard to meet its housing and community needs and will work hard to meet the goals set for in this plan as well as the past three Annual Action Plans.

4. Summary of Citizen Participation Process and consultation process

Summary from citizen participation section of plan.

Two public hearings were held to solicit input for the plan. The first public hearing that was held on December 15, 2022, was designed to receive comments on housing and community development needs and requests for funding from non-profit agencies. The second public hearing will be held May 18, 2023.

Notices of both public hearings were advertised in the Lebanon Daily News, on the City's website and live streamed to YouTube.

5. Summary of public comments

This could be a brief narrative summary or reference an attached document from the Citizen Participation section of the Con Plan.

This could be a brief narrative summary or reference an attached document from the Citizen Participation section of the Con Plan.

There were no public comments for the first public hearing on December 15, 2022. Public comments are to-be determined following the May 18, 2023 public hearing.

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

N/A

7. Summary

A copy of the Consolidated Plan and Annual Action Plan are available on the City's website, and copies were placed at the following locations in the City of Lebanon for public review: City Clerk's Office, Office of Community & Economic Development and Lebanon Community Library.

PR-05 Lead & Responsible Agencies – 91.200(b)

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
Lead Agency	LEBANON	
CDBG Administrator		Community Development
HOME Administrator		

Table 1 – Responsible Agencies

Narrative (optional)

The City of Lebanon Community & Economic Development office is responsible for the planning, implementation and reporting of the community development programs in accordance with all federal requirements. The Community & Economic Development Administrator prepares the Consolidated Plan, Annual Action Plan and CAPER documents in consultation with both public and private entities including the Lebanon County offices, nonprofits, service organizations and other local municipalities. The Community and Economic Development Administrator oversee the implementation of federally funded community development programs and projects with the City of Lebanon annually. The City has delegated the responsibility of administering its housing programs to the Lebanon County Redevelopment Authority (Redevelopment Authority).

Consolidated Plan Public Contact Information

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AP-10 Consultation – 91.100, 91.200(b), 91.215(I)

1. Introduction

In addition to community meetings, the City of Lebanon has invited other governmental agencies and nonprofits to provide insight and input into the goals and actions that should be considered in the consolidated planning process. Agencies and nonprofit organizations that serve the City of Lebanon have been contacted to identify specific needs and subsequent actions to address needs.

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(I))

In preparing the Plan, the City consulted with various organizations located in Lebanon County that provide services to the residents of the City. In many instances, these consultations are part of on-going interactions between the City and the agency or group described.

City of Lebanon

1. City Council – approve a resolution for the submission of the Plan and Annual Action Plan to HUD
2. City of Lebanon Community & Economic Development Office reviews CDBG funded projects and are responsible for drafting the City’s Consolidated Plan and Annual 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.

Planning for assistance for the homeless in the City of Lebanon and Lebanon County is coordinated through the State. The PA Steering Committee on Homelessness (SC) is the lead entity for the COC. In keeping with the COC philosophy, the SC formed four separate regional Continuums of Care. The City of Lebanon is in the Altoona region. Each region formed a Regional Advisory Board (RHAB) comprised of representatives of local entities involved in housing and homeless services.

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

The ESG program is administered through the Pennsylvania Department of Community and Economic Development. The City of Lebanon is not a recipient of 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

Table 2 – Agencies, groups, organizations who participated

1	Agency/Group/Organization	LEBANON COUNTY REDEVELOPMENT AUTHORITY
	Agency/Group/Organization Type	Housing PHA Services - Housing Service-Fair Housing
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Public Housing Needs Lead-based Paint Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	

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

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?
Continuum of Care		

Table 3 – Other local / regional / federal planning efforts

Narrative (optional)

AP-12 Participation – 91.105, 91.200(c)

1. Summary of citizen participation process/Efforts made to broaden citizen participation Summarize citizen participation process and how it impacted goal-setting

In order to ensure maximum participation in the planning process among all populations and special needs groups and to ensure that their issues and concerns are adequately addressed, the City followed its Citizen Participation Plan updated in 2020. The Citizen Participation Plan describes the actions to be taken to encourage citizen participation in the development of the Consolidated Plan, any Substantial Amendments, the Annual Action Plan, and CAPER.

Access to Meetings, Information Records – to ensure that citizens, public agencies, and other interested parties have the opportunity to review and comment, the CPP ensures that the public will be provided with reasonable and timely access to meetings, information and records relating to proposed housing and community development activities, the proposed use of housing and community development funds, and the City's use of CDBG funds.

Technical Assistance – The City provides technical assistance to any persons or groups interested in developing CDBG funding proposals.

Public Notices – Notices of: (1) public hearings/public meetings related to the consolidated planning process, (2) funding availability and application meetings, (3) publication of the draft Consolidated Plan (including the Annual Action Plan), (4) proposed Substantial Amendments to the Consolidated Plan, and (5) publication of the draft CAPER, are published in the LDN and posted on the City's website.

Publication of Draft Documents – Notice of availability of the draft Consolidated Plan, Substantial Amendments, Annual Action Plan, and CAPER are published in the LDN.

Public Hearings/Public Meetings – The City holds public hearings/meetings annually, during different stages of the community development planning process to obtain citizen's views and to respond to proposals and questions. Prior to the draft Consolidated Plan and/or Annual Action Plan being published for its 30-day public comment period, one of the two hearings/meetings will be held. Public hearings and meetings are scheduled at times and location convenient to potential or actual beneficiaries. In all cases, meeting locations are wheelchair accessible. Special accommodation for persons with disabilities can be made upon request. In cases where significant number of non-English speaking residents

are expected to attend a public hearing/meeting, the City will supply an interpreter. The City has been able to reach more residents since offering the virtual option to view recordings of the meetings.

Public Comments – The views of citizens, public agencies and other interested parties are considered before the City submits the Annual Action Plan, and Substantial Amendments to the Consolidated Plan and the CAPER to HUD. Public Comments may be presented orally at public hearings and meetings, or may be submitted in writing to the City. Following publication of the draft Consolidated Plan and/or Action Plan and any Substantial Amendment to the Consolidated Plan and/or Action Plan, citizens are given at least 30 days in which to submit written comments. Following publication of the draft CAPER, citizens are given 15 days to submit written comments. A summary of all oral comments and full copies of all written comments are attached to the final document.

Availability of Final Documents – The adopted Consolidated Plan, approved Substantial Amendments, the Annual Plan and the CAPER are available to the public. Final documents are posted on the City’s website and are available upon request.

Response to Complaints – The City provides a timely, substantive written answer to every written citizen complaint relating to the Consolidated Plan, substantial amendments to the Plan and the performance report, where practicable, within 15 working days.

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	Newspaper Ad	Non-targeted/broad community	The ad was posted in the Lebanon Daily News - Legal Section for both public hearings.	No comments were received.	No comments were not accepted.	

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)
2	Public Hearing	Non-targeted/broad community	For this Annual Action Plan, the City conducted two public hearings to solicit input into the preparation of the Action Plan. The meetings were advertised in the LDN. The first public hearing was held on December 15, 2022 and the second public hearing was held on March 15, 2023. Both meetings were streamed to YouTube. Minutes of the meetings, public hearing notices, and citizen comments are included in the appendix of this document.	No Comments were received.	No comments were not accepted.	

Table 4 – Citizen Participation Outreach

Expected Resources

AP-15 Expected Resources – 91.220(c)(1,2)

Introduction

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	694,547	20,000	0	714,547	0	

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

The City of Lebanon will be receiving \$694,547.00 as its FY2023 CDBG entitlement amount. In addition, the City will receive approximately

\$20,000 in program income. This sum is expected from loans that are being repaid to the City. Additionally, the City anticipates using \$463,780 in prior year CDBG funding to complete additional projects outlined in prior year plans.

The City of Lebanon received \$250,000 in HOME funds through the Commonwealth of Pennsylvania since the City is not a HOME entitlement community. The City is not an entitlement Community for Emergency Shelter Grant funds nor HOPWA funding. The City also received CDBG-CV funds to help prevent and prepare for the spread of COVID-19. The funds are being leveraged to help economic development following the major impacts COVID-19 has had on our businesses as well as to address the homelessness needs. The City of Lebanon also received Fiscal Recovery Funds that are being used for a

large variety of improvement projects and service programs in City.

The Lebanon County Housing Authority will receive federal funds during FY 2023. The Lebanon County Housing Authority received an annual Capital Fund Program entitlement and receives Section 8 Rental Assistance funds.

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

CDBG funding will be used to improve existing City public facilities to benefit low and moderate income persons. These public facilities include street and watermain improvements.

Discussion

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	Public Facilities and Infrastructure	2020	2024	Non-Housing Community Development	City of Lebanon, PA	Public Facilities	CDBG: \$260,547	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 12110 Persons Assisted
2	Housing Rehabilitation	2020	2024	Affordable Housing	City of Lebanon, PA	Affordable Housing Blight Elimination	CDBG: \$80,000	Homeowner Housing Rehabilitated: 80000 Household Housing Unit
3	Code Enforcement	2020	2024	Blight Elimination	City of Lebanon, PA	Blight Elimination	CDBG: \$130,000	Housing Code Enforcement/Foreclosed Property Care: 20000 Household Housing Unit
4	Public Services	2020	2024	Non-Housing Community Development	City of Lebanon, PA	Public Services	CDBG: \$104,000	Public service activities other than Low/Moderate Income Housing Benefit: 8000 Persons Assisted
5	Administration	2020	2024	Administration	City of Lebanon, PA		CDBG: \$120,000	

Table 6 – Goals Summary

Goal Descriptions

1	Goal Name	Public Facilities and Infrastructure
	Goal Description	Public Facility or Infrastructure Activities for Low/Moderate Income Housing Benefit: 12110 Households Assisted
2	Goal Name	Housing Rehabilitation
	Goal Description	Homeowner Housing Rehabilitated: 4 Household Housing Unit
3	Goal Name	Code Enforcement
	Goal Description	Housing Code Enforcement/Foreclosed Property Care: 2000 Household Housing Unit
4	Goal Name	Public Services
	Goal Description	Public service activities other than Low/Moderate Income Housing Benefit: 8000 Persons Assisted
5	Goal Name	Administration
	Goal Description	Administration of the CDBG Program

Projects

AP-35 Projects – 91.220(d)

Introduction

Activities are direct responses to the needs assessment and market analysis in the 5-Year CP and ongoing consultations and citizen participation. Priority areas include affordable housing, improving facilities and infrastructure, blight elimination and public service. The following chart provides descriptions and the budget for 2023 CDBG activities.

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

All activities will service a low/moderate income area as defined by the Census. Projects serving low-income areas include: street improvements, crime prevention and code enforcement. Homeowner Housing Rehabilitation Program is City-wide but require the individual/family to qualify by income.

AP-50 Geographic Distribution – 91.220(f)

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

The City is divided into Census Tracts. Statistics, including income, homeownership status, family size, and race are determined for each tract based on responses to census questionnaires. The information determines Lebanon’s eligibility for CDBG funds.

Low –income census tracts are those where 51 percent or more of the population have income below 80 percent of the median income.

The City is 81.25% low-income. Therefore, the entire City qualifies as a low-income area. Most of the activities to be funded, other than crime prevention and street and water main improvements, are city-wide activities.

Geographic Distribution

Target Area	Percentage of Funds
City of Lebanon, PA	100

Table 7 - Geographic Distribution

Rationale for the priorities for allocating investments geographically

The entire City qualifies as a low-income area. Projects are taking place within certain areas of the City based on need.

Discussion

Affordable Housing

AP-55 Affordable Housing – 91.220(g)

Introduction

The City’s annual goals for affordable housing include the following:

1. Increasing home ownership opportunities for City residents

The City of Lebanon will increase the percentage of first-time homebuyers in the community by providing down-payment assistance. By continuing to pursue increased home ownership among low income households as a goals, the City of Lebanon is supporting increased home ownership by minority households in agreement with national goals.

2. Reduce Housing Blight and Deterioration among Owner Households

Older housing units that require significant maintenance occupied by households with limited incomes results in deferred maintenance leading to disinvestment, declining property values, and possibly abandonment. Supporting programs and activities to assist homeowners in the City of Lebanon to make improvements to housing will protect the existing housing stock in the community. Assisting households with maintaining their housing is also important to sub-populations, such as the elderly and disabled who have fixed and limited incomes, to continue to own their home and avoid being institutionalized or possibly becoming homeless.

One Year Goals for the Number of Households to be Supported	
Homeless	0
Non-Homeless	4
Special-Needs	0
Total	4

Table 8 - 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	0
Rehab of Existing Units	4
Acquisition of Existing Units	0
Total	4

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

Discussion

AP-60 Public Housing – 91.220(h)

Introduction

The Lebanon County Housing Authority administers public housing in the City of Lebanon. The Housing Authority has not made any significant changes in the Capital Fund Grant Plan. The agency is listed by HUD as a High performer. The Housing Authority's Five Year Plan for 2020 -2024 is attached as Appendix 5.

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

Please see the Lebanon County Housing Authority's Five Year Plan for Fiscal Years 2020-2024, Draft Annual Plan Update 2023.

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

Please see the Lebanon County Housing Authority's Five Year Plan for Fiscal Years 2020-2024, Draft Annual Plan Update 2023.

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

Please see the Lebanon County Housing Authority's Five Year Plan for Fiscal Years 2020-2024, Draft Annual Plan Update 2023.

Discussion

AP-65 Homeless and Other Special Needs Activities – 91.220(i)

Introduction

Strategy, goals and action steps for ending chronic homelessness in the PA Northeast Continuum of Care are formulated on the State level. Each region has formed a Regional Homeless Advisory Board comprised on representatives of local entities involved in housing and homeless services. The City of Lebanon is in the Central-Harrisburg region.

The City's priority homeless objectives are to:

1. Support emergency shelter and transitional housing services through local nonprofit organizations and social service agencies; and
2. Support services to assist homeless persons and families make the transition to permanent housing and independent living.

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 population of homeless people in the City of Lebanon does not meet HUD's definition of chronically homeless. The City is combating chronic homelessness by supporting the emergency shelters, transitional housing facilities, and permanent housing facilities. Wrap-around social services provided by these and other organizations help to break the cycle of chronic homelessness.

Addressing the emergency shelter and transitional housing needs of homeless persons

The Community Action Partnership (CAP) is a County agency that provides an array of services to Lebanon County residents through a variety of programs. A few of the services include rental assistance, shelter assistance, bridge housing and permanent affordable housing, shelter housing, and barrier remediation. Lebanon County Christian Ministries to be able to provide services such as emergency shelters and the Fresh Start Program. Lebanon Rescue Mission provides temporary housing to individuals and families while connecting them to needed services and help to get them a job.

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

Not applicable.

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.

Not applicable.

Discussion

AP-75 Barriers to affordable housing – 91.220(j)

Introduction:

Barriers to affordable housing are varied. There are developmental barriers that include land acquisition costs, construction costs and permit fees. Often time developers face timing obstacles that can delay projects due to public funding and financing requirements. Land use barriers such as minimum lot sizes and other dimensional requirements effect density and can create a situation that makes affordable housing development uneconomical. The City of Lebanon requires Zoning Hearing Board approval for variances, conditional uses and special exceptions, which can result in timing delays and additional engineering and design costs.

Currently, purchasing affordable housing has become very difficult. Houses are selling above asking price and are getting many offers which make it very difficult for anyone purchasing a home through a program like the First Time Home Buyer.

The City of Lebanon, Community Health Council of Lebanon County and our Lebanon County Planning Department has partnered together to complete a Housing Analysis looking at our barriers and housing stock and tangible goals to address the needs in our community. That plan is estimated to be completed by August 2023.

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

The City of Lebanon adopted a new Zoning Ordinance in 2020 which helped to remove barriers and create new opportunities for affordable housing.

The Lebanon City Land Bank was also created in 2019 to purchase blighted properties and properties that are sold at the Judicial Tax Sale to rehab and create affordable housing. Most the of properties will be sold to first-time homebuyers.

Additionally, the City has allocated an amount of its annual CDBG entitlement grant to support homeowner rehabilitation program and a first-time homebuyer program. The City also received funds from PA Department of Community and Economic Development HOME Program.

Discussion:

AP-85 Other Actions – 91.220(k)

Introduction:

The City will continue to seek additional funding sources to address underserved needs.

The City continues to pursue and support various activities in an effort to provide an environment that will attract businesses to remain, expand or relocate to the City of Lebanon. An objective of the strategies is to continue to pursue economic development through revitalization and to explore the possibilities stated in the Economic Development Strategic Plan for the City.

Actions planned to address obstacles to meeting underserved needs

The City will continue to cooperate with various social service agencies, low-income housing advocates and affordable housing providers to address the underserved needs of area residents. In order to affirmatively further fair housing, the City in partnership with community organizations hired a consultant to complete a Housing Analysis which is estimated to be completed in August 2023. Additionally, Fair Housing information is on display in public areas of City Hall.

The City has also recently awarded \$1 million in Fiscal Recovery Funds to non-profit service organizations to be able to expand their services to low-income residents of Lebanon City.

Actions planned to foster and maintain affordable housing

CDBG Funds are used to support the City's housing programs, including the Emergency Homeowner Rehabilitation Program and the First-Time Homebuyer Program. The City also has a \$250,000 HOME grant to complete full rehabs to owner occupied houses.

The City of Lebanon created a Land Bank in 2019 to purchase blighted properties and rehab to create affordable housing.

The City has also awarded over \$150,000 in Fiscal Recovery Funds to non-profits like Habitat for Humanity who will use those funds to create affordable housing from blighted properties in the City of Lebanon.

Actions planned to reduce lead-based paint hazards

The guidelines for the City's Housing Rehabilitation program comply with the lead-based paint hazards at 24 CFR 35.

Actions planned to reduce the number of poverty-level families

The resources the City of Lebanon has to reduce the number of persons with incomes below the

poverty level are limited. The City assists low to moderate income residents through its housing programs.

Since poverty is based upon income, its effect on housing opportunity and choice is apparent. Conversely, without adequate, stable housing and employment opportunities, alleviating poverty becomes difficult.

The lower income and higher rate of poverty among the minority households is attributable to lower skills level due to lower levels of education. The low education level indicates lack of skills required to find steady, well-paying employment that offers opportunities for advancement.

To help furth education opportunities to low income residents, the City awarded over \$200,000 in Fiscal Recovery Funds to non-profit organizations who are providing education and training certifications.

Actions planned to develop institutional structure

The Community Development Office oversees Lebanon’s housing and community development programs and is responsible for all performance measurement activities. The monitoring requirements and procedures under the 2023 Action Plan will utilize existing monitoring systems and experience in administering federal and state programs and funds.

The Community Development Office monitors all proposed activities to ensure long-term compliance with program requirements. The objectives of this monitoring are to make sure that activities:

- 1) comply with all regulations governing their administrative, financial, and programmatic operations including compliance with the Consolidated Plan; and
- 2) achieve their performance objectives within schedule and budget.

The Community Development Office utilizes project checklists to ensure and document program compliance. The Director of the Community Development Office is also responsible for the timely implementation of activities. Quarterly, the Director review the expenditures against the ratio used by HUD (1.5 times the allocation on hand at the end of the program year) to ensure that the goal will be met.

All subrecipients of CDBG funds are subject to monitoring. The Community Development Office maintains a written policy for the monitoring of subrecipients. Fiscal monitoring will include review and approval of budgets, compliance and executed grant agreements, beneficiary reports, review of fiscal reports, and a review of audits on an annual basis.

Annually, in the preparation of the Consolidated Annual Performance Evaluation Report (CAPER), the Community Development Office with review whether the specific objectives outlined in this

strategic plan are being met. Further, this review will be an opportunity to assess if the strategic plan goals continue to address community priorities and if adequate resources are available to meet the objectives. Community input will be sought in this analysis.

Internal controls have been designed to ensure adequate segregation of duties. The Community Development Office prepares agreements for non-housing activities supported by CDBG. Invoices are monitored for compliance with the approved spending plan and federal regulations.

The Community Development Office administers Lebanon's Integrated Disbursement and Information System (IDIS). The Community Development Office is also primarily responsible for setting up and administering activities.

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

Lebanon's Community Development Office is responsible for enhancing the coordination among housing providers, service agencies, and public entities. During the 2023 program year, the City intends to continue to cooperate with various agencies in the region to meet the housing and supportive needs of residents.

Discussion:

The City of Lebanon continues to interact with the various public and non-profit institutions that provide housing and supportive services to low-income residents.

The City of Lebanon has been blessed with Fiscal Recovery Funds that have been able to greatly help community needs that were existing before the pandemic as well as needs that arose because of the pandemic.

Program Specific Requirements

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

Introduction:

Community Development Block Grant Program (CDBG)

Reference 24 CFR 91.220(I)(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	20,000
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
3. The amount of surplus funds from urban renewal settlements	0
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
5. The amount of income from float-funded activities	0
Total Program Income:	20,000

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. Overall Benefit - A consecutive period of one, two or three years may be used to determine that a minimum overall benefit of 70% of CDBG funds is used to benefit persons of low and moderate income. Specify the years covered that include this Annual Action Plan.	0.00%

In Fiscal Year 2023, the City anticipates receiving approximately \$20,000.00 in program income, all of which will be receipted in IDIS and committed to activities. The City does not have any section 108 guarantees, urban renewal settlements, funds returned to the line of credit and float-funded activities.