



City of Gastonia/Gastonia Consortium

**Consolidated Annual  
Performance  
And  
Evaluation Report**

**CAPER**

**2013-2014**

**Prepared by:**

**Housing & Neighborhoods Staff  
150 S. York Street  
Gastonia, NC 28052**

**CITY OF GASTONIA – 2013-2014**  
**CONSOLIDATED ANNUAL PERFORMANCE & EVALUATION REPORT (CAPER)**  
**CHECKLIST AND TABLE OF CONTENTS**

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- A complete CAPER requires that all data for the program year be entered into IDIS. It is Departmental policy that IDIS data be updated at least quarterly. Grantees are not required to submit IDIS reports to HUD but must make information about accomplishments, progress and finances available to the public as part of the citizen participation process.

**AFFIDAVIT OF INSERTION OF ADVERTISEMENT**  
**The Gaston Gazette**

**PUBLIC NOTICE**  
**CONSOLIDATED ANNUAL**  
**PERFORMANCE**  
**AND EVALUATION REPORT (CAPER)**  
**2013 - 2014**  
**COMMENT PERIOD**

The Consolidated Annual Performance and Evaluation Report (CAPER) for the 2013/2014 Program Year of the Community Development Block Grant has been prepared and will be submitted to the Department of Housing and Urban Development on or about September 26, 2014. Beginning August 15, 2014, copies of the report will be available for public inspection and comment at the office of the Housing and Neighborhoods Division of the City of Gastonia, Second Floor - Suite 218, Garland Municipal Business Center, 150 S. York Street, Gastonia, North Carolina between the hours of 8:30 a.m. and 4:30 p.m., Monday through Friday.

The City of Gastonia invites public comment on the CAPER during the public comment period, August 16, 2014 through September 16, 2014. Copies of the report can be inspected at the following locations:

Bradley Community Center

1200 N. Modena Street

Erwin Community Center

913 N. Pryor Street

Phillips Community Center

2031 Echo Lane

Southeast Community Center

2100 Robinwood Road

T. Jeffers Community Center

121 Hartman Street

Gastonia Housing Authority

340 West Long Avenue

Gaston County Public Library - (REFERENCE SECTION)

1555 E. Garrison Blvd.

*Este informacion esta disponible en espanol o en cualquier otro idioma bajo peticion. Por favor, pongase en contacto con Myra T. Nichols al 704-866-6752 o en 150 South York Street, Gastonia, NC de alojamiento para esta solicitud.*

For additional information, please call (704) 866-6752.

Myra T. Nichols

Housing & Neighborhoods Administrator

Housing and Neighborhoods Division

City of Gastonia

1-C August 4, 2014

**Gastonia, N.C.**  
**Gaston County**

**The Gaston Gazette** does certify that the advertisement for:

**PUBLIC NOTICE**  
**CONSOLIDATED ANNUAL PERFROMANCE AND**  
**EVALUATION REPORT (CAPER)**  
**2013-2014 COMMENT PERIOD**

Measuring 14.00 column inches appeared in The Gaston Gazette, a newspaper published in Gaston County, Gastonia, N.C., in issue(s):

August 4, 2014

Name of Account: Danette Dye / City of Gastonia

IO Number: 52522

Customer Number: 16316

Sworn to and subscribed before me this 22nd day of September, 2014.



*Serella M. Greene*

Serella M. Greene, Notary Public  
My Commission Expires October 24, 2016

# **NOTICE OF PUBLIC HEARING CITY OF GASTONIA CONSOLIDATED ANNUAL PERFORMANCE AND EVALUATION REPORT**

The Community Development Division of the City of Gastonia will hold a public hearing on Monday, August 18, 2014 at 6:00 PM, at the Gaston Public Library, Library Auditorium, 1555 E. Garrison Boulevard, Gastonia, NC 28054. The purpose of this public hearing will be to obtain views from the public on the Consolidated Annual Performance and Evaluation Report (CAPER). The Consolidated Annual Performance and Evaluation Report is a document, which is used to measure the actual performance of an agency in meeting the goals and objectives described in the Consolidated Plan and Annual Action Plan.

**INDIVIDUALS REQUIRING SPECIAL ACCOMMODATIONS AT THIS PUBLIC HEARING SHOULD CALL THE ADA COORDINATOR AT (704) 866-6861 OR (704) 866-6843 FOR TDD USERS WITHIN 48 HOURS OF THE PUBLIC HEARING.**

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Myra T. Nichols  
Housing & Neighborhoods Administrator  
Housing and Neighborhoods Division  
City of Gastonia

1 – C August 6, 2014

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Myra T. Nichols  
Housing & Neighborhoods Administrator  
Housing and Neighborhoods Division  
City of Gastonia  
1 - C August 6, 2014

**Gastonia, N.C.**  
**Gaston County**

**The Gaston Gazette does certify that the advertisement for:**

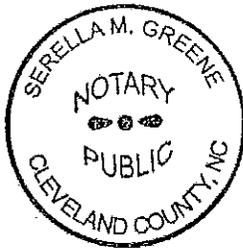
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*Serella M. Greene*  
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Myra T. Nichols  
Housing & Neighborhoods Administrator  
Housing and Neighborhoods Division  
City of Gastonia  
1-C August 4, 2014





# CPMP Non-State Grantee Certifications

Many elements of this document may be completed electronically, however a signature must be manually applied and the document must be submitted in paper form to the Field Office.

- This certification does not apply.  
 This certification is applicable.

## NON-STATE GOVERNMENT CERTIFICATIONS

In accordance with the applicable statutes and the regulations governing the consolidated plan regulations, the jurisdiction certifies that:

**Affirmatively Further Fair Housing** -- The jurisdiction will affirmatively further fair housing, which means it will conduct an analysis of impediments to fair housing choice within the jurisdiction, take appropriate actions to overcome the effects of any impediments identified through that analysis, and maintain records reflecting that analysis and actions in this regard.

**Anti-displacement and Relocation Plan** -- It will comply with the acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended, and implementing regulations at 49 CFR 24; and it has in effect and is following a residential antidisplacement and relocation assistance plan required under section 104(d) of the Housing and Community Development Act of 1974, as amended, in connection with any activity assisted with funding under the CDBG or HOME programs.

**Drug Free Workplace** -- It will or will continue to provide a drug-free workplace by:

1. Publishing a statement notifying employees that the unlawful manufacture, distribution, dispensing, possession, or use of a controlled substance is prohibited in the grantee's workplace and specifying the actions that will be taken against employees for violation of such prohibition;
2. Establishing an ongoing drug-free awareness program to inform employees about --
  - a. The dangers of drug abuse in the workplace;
  - b. The grantee's policy of maintaining a drug-free workplace;
  - c. Any available drug counseling, rehabilitation, and employee assistance programs; and
  - d. The penalties that may be imposed upon employees for drug abuse violations occurring in the workplace;
3. Making it a requirement that each employee to be engaged in the performance of the grant be given a copy of the statement required by paragraph 1;
4. Notifying the employee in the statement required by paragraph 1 that, as a condition of employment under the grant, the employee will --
  - a. Abide by the terms of the statement; and
  - b. Notify the employer in writing of his or her conviction for a violation of a criminal drug statute occurring in the workplace no later than five calendar days after such conviction;
5. Notifying the agency in writing, within ten calendar days after receiving notice under subparagraph 4(b) from an employee or otherwise receiving actual notice of such conviction. Employers of convicted employees must provide notice, including position title, to every grant officer or other designee on whose grant activity the convicted employee was working, unless the Federal agency has designated a central point for the receipt of such notices. Notice shall include the identification number(s) of each affected grant;
6. Taking one of the following actions, within 30 calendar days of receiving notice under subparagraph 4(b), with respect to any employee who is so convicted --
  - a. Taking appropriate personnel action against such an employee, up to and including termination, consistent with the requirements of the Rehabilitation Act of 1973, as amended; or
  - b. Requiring such employee to participate satisfactorily in a drug abuse assistance or rehabilitation program approved for such purposes by a Federal, State, or local health, law enforcement, or other appropriate agency;
7. Making a good faith effort to continue to maintain a drug-free workplace through implementation of paragraphs 1, 2, 3, 4, 5 and 6.

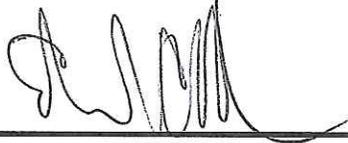
**Anti-Lobbying** -- To the best of the jurisdiction's knowledge and belief:

8. No Federal appropriated funds have been paid or will be paid, by or on behalf of it, to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with the awarding of any Federal contract, the making of any Federal grant, the making of any Federal loan, the entering into of any cooperative agreement, and the extension, continuation, renewal, amendment, or modification of any Federal contract, grant, loan, or cooperative agreement;
9. If any funds other than Federal appropriated funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this Federal contract, grant, loan, or cooperative agreement, it will complete and submit Standard Form-LLL, "Disclosure Form to Report Lobbying," in accordance with its instructions; and
10. It will require that the language of paragraph 1 and 2 of this anti-lobbying certification be included in the award documents for all subawards at all tiers (including subcontracts, subgrants, and contracts under grants, loans, and cooperative agreements) and that all subrecipients shall certify and disclose accordingly.

**Authority of Jurisdiction** -- The consolidated plan is authorized under State and local law (as applicable) and the jurisdiction possesses the legal authority to carry out the programs for which it is seeking funding, in accordance with applicable HUD regulations.

**Consistency with plan** -- The housing activities to be undertaken with CDBG, HOME, ESG, and HOPWA funds are consistent with the strategic plan.

**Section 3** -- It will comply with section 3 of the Housing and Urban Development Act of 1968, and implementing regulations at 24 CFR Part 135.



09/17/2014

Signature/Authorized Official

Date

Edward C. Munn

Name

City Manager, City of Gastonia

Title

181 S. South Street

Address

Gastonia, NC 28052

City/State/Zip

704-866-6756

Telephone Number

- 
- 
- This certification does not apply.  
 This certification is applicable.

### Specific CDBG Certifications

The Entitlement Community certifies that:

**Citizen Participation** -- It is in full compliance and following a detailed citizen participation plan that satisfies the requirements of 24 CFR 91.105.

**Community Development Plan** -- Its consolidated housing and community development plan identifies community development and housing needs and specifies both short-term and long-term community development objectives that provide decent housing, expand economic opportunities primarily for persons of low and moderate income. (See CFR 24 570.2 and CFR 24 part 570)

**Following a Plan** -- It is following a current consolidated plan (or Comprehensive Housing Affordability Strategy) that has been approved by HUD.

**Use of Funds** -- It has complied with the following criteria:

11. Maximum Feasible Priority - With respect to activities expected to be assisted with CDBG funds, it certifies that it has developed its Action Plan so as to give maximum feasible priority to activities which benefit low and moderate income families or aid in the prevention or elimination of slums or blight. The Action Plan may also include activities which the grantee certifies are designed to meet other community development needs having a particular urgency because existing conditions pose a serious and immediate threat to the health or welfare of the community, and other financial resources are not available);
12. Overall Benefit - The aggregate use of CDBG funds including section 108 guaranteed loans during program year(s) 2011, 2012, 2013, (a period specified by the grantee consisting of one, two, or three specific consecutive program years), shall principally benefit persons of low and moderate income in a manner that ensures that at least 70 percent of the amount is expended for activities that benefit such persons during the designated period;
13. Special Assessments - It will not attempt to recover any capital costs of public improvements assisted with CDBG funds including Section 108 loan guaranteed funds by assessing any amount against properties owned and occupied by persons of low and moderate income, including any fee charged or assessment made as a condition of obtaining access to such public improvements.

However, if CDBG funds are used to pay the proportion of a fee or assessment that relates to the capital costs of public improvements (assisted in part with CDBG funds) financed from other revenue sources, an assessment or charge may be made against the property with respect to the public improvements financed by a source other than CDBG funds.

The jurisdiction will not attempt to recover any capital costs of public improvements assisted with CDBG funds, including Section 108, unless CDBG funds are used to pay the proportion of fee or assessment attributable to the capital costs of public improvements financed from other revenue sources. In this case, an assessment or charge may be made against the property with respect to the public improvements financed by a source other than CDBG funds. Also, in the case of properties owned and occupied by moderate-income (not low-income) families, an assessment or charge may be made against the property for public improvements financed by a source other than CDBG funds if the jurisdiction certifies that it lacks CDBG funds to cover the assessment.

**Excessive Force** -- It has adopted and is enforcing:

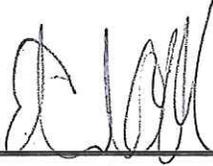
14. A policy prohibiting the use of excessive force by law enforcement agencies within its jurisdiction against any individuals engaged in non-violent civil rights demonstrations; and
15. A policy of enforcing applicable State and local laws against physically barring entrance to or exit from a facility or location which is the subject of such non-violent civil rights demonstrations within its jurisdiction;

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**Compliance With Anti-discrimination laws** -- The grant will be conducted and administered in conformity with title VI of the Civil Rights Act of 1964 (42 USC 2000d), the Fair Housing Act (42 USC 3601-3619), and implementing regulations.

**Lead-Based Paint** -- Its activities concerning lead-based paint will comply with the requirements of part 35, subparts A, B, J, K and R, of title 24;

**Compliance with Laws** -- It will comply with applicable laws.



09/17/2014

Signature/Authorized Official

Date

Edward C. Munn

Name

City Manger, City of Gastonia

Title

181 S. South Street

Address

Gastonia, NC 28053-1748

City/State/Zip

704-866-6756

Telephone Number

- 
- This certification does not apply.  
 This certification is applicable.

**OPTIONAL CERTIFICATION  
CDBG**

Submit the following certification only when one or more of the activities in the action plan are designed to meet other community development needs having a particular urgency as specified in 24 CFR 570.208(c):

The grantee hereby certifies that the Annual Plan includes one or more specifically identified CDBG-assisted activities, which are designed to meet other community development needs having a particular urgency because existing conditions pose a serious and immediate threat to the health or welfare of the community and other financial resources are not available to meet such needs.

---

Signature/Authorized Official

Date

Name

Title

Address

City/State/Zip

Telephone Number

- 
- This certification does not apply.  
 This certification is applicable.

### Specific HOME Certifications

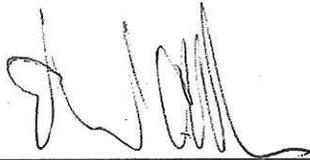
The HOME participating jurisdiction certifies that:

**Tenant Based Rental Assistance** -- If the participating jurisdiction intends to provide tenant-based rental assistance:

The use of HOME funds for tenant-based rental assistance is an essential element of the participating jurisdiction's consolidated plan for expanding the supply, affordability, and availability of decent, safe, sanitary, and affordable housing.

**Eligible Activities and Costs** -- it is using and will use HOME funds for eligible activities and costs, as described in 24 CFR § 92.205 through 92.209 and that it is not using and will not use HOME funds for prohibited activities, as described in § 92.214.

**Appropriate Financial Assistance** -- before committing any funds to a project, it will evaluate the project in accordance with the guidelines that it adopts for this purpose and will not invest any more HOME funds in combination with other Federal assistance than is necessary to provide affordable housing;



09/17/2014

Signature/Authorized Official

Date

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704-866-6756

Telephone Number

- 
- 
- This certification does not apply.**  
 **This certification is applicable.**

### HOPWA Certifications

The HOPWA grantee certifies that:

**Activities** -- Activities funded under the program will meet urgent needs that are not being met by available public and private sources.

**Building** -- Any building or structure assisted under that program shall be operated for the purpose specified in the plan:

1. For at least 10 years in the case of assistance involving new construction, substantial rehabilitation, or acquisition of a facility,
2. For at least 3 years in the case of assistance involving non-substantial rehabilitation or repair of a building or structure.

---

Signature/Authorized Official

Date

Name

Title

Address

City/State/Zip

Telephone Number

- 
- 
- This certification does not apply.**  
 **This certification is applicable.**

### ESG Certifications

I, \_\_\_\_\_, Chief Executive Officer of \_\_\_\_\_, certify that the local government will ensure the provision of the matching supplemental funds required by the regulation at 24 *CFR* 576.51. I have attached to this certification a description of the sources and amounts of such supplemental funds.

I further certify that the local government will comply with:

1. The requirements of 24 *CFR* 576.53 concerning the continued use of buildings for which Emergency Shelter Grants are used for rehabilitation or conversion of buildings for use as emergency shelters for the homeless; or when funds are used solely for operating costs or essential services.
2. The building standards requirement of 24 *CFR* 576.55.
3. The requirements of 24 *CFR* 576.56, concerning assurances on services and other assistance to the homeless.
4. The requirements of 24 *CFR* 576.57, other appropriate provisions of 24 *CFR* Part 576, and other applicable federal laws concerning nondiscrimination and equal opportunity.
5. The requirements of 24 *CFR* 576.59(b) concerning the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970.
6. The requirement of 24 *CFR* 576.59 concerning minimizing the displacement of persons as a result of a project assisted with these funds.
7. The requirements of 24 *CFR* Part 24 concerning the Drug Free Workplace Act of 1988.
8. The requirements of 24 *CFR* 576.56(a) and 576.65(b) that grantees develop and implement procedures to ensure the confidentiality of records pertaining to any individual provided family violence prevention or treatment services under any project assisted with ESG funds and that the address or location of any family violence shelter project will not be made public, except with written authorization of the person or persons responsible for the operation of such shelter.
9. The requirement that recipients involve themselves, to the maximum extent practicable and where appropriate, homeless individuals and families in policymaking, renovating, maintaining, and operating facilities assisted under the ESG program, and in providing services for occupants of these facilities as provided by 24 *CFR* 76.56.
10. The requirements of 24 *CFR* 576.57(e) dealing with the provisions of, and regulations and procedures applicable with respect to the environmental review responsibilities under the National Environmental Policy Act of 1969 and related

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authorities as specified in 24 *CFR* Part 58.

11. The requirements of 24 *CFR* 576.21(a)(4) providing that the funding of homeless prevention activities for families that have received eviction notices or notices of termination of utility services will meet the requirements that: (A) the inability of the family to make the required payments must be the result of a sudden reduction in income; (B) the assistance must be necessary to avoid eviction of the family or termination of the services to the family; (C) there must be a reasonable prospect that the family will be able to resume payments within a reasonable period of time; and (D) the assistance must not supplant funding for preexisting homeless prevention activities from any other source.
12. The new requirement of the McKinney-Vento Act (42 *USC* 11362) to develop and implement, to the maximum extent practicable and where appropriate, policies and protocols for the discharge of persons from publicly funded institutions or systems of care (such as health care facilities, foster care or other youth facilities, or correction programs and institutions) in order to prevent such discharge from immediately resulting in homelessness for such persons. I further understand that state and local governments are primarily responsible for the care of these individuals, and that ESG funds are not to be used to assist such persons in place of state and local resources.
13. HUD's standards for participation in a local Homeless Management Information System (HMIS) and the collection and reporting of client-level information.

I further certify that the submission of a completed and approved Consolidated Plan with its certifications, which act as the application for an Emergency Shelter Grant, is authorized under state and/or local law, and that the local government possesses legal authority to carry out grant activities in accordance with the applicable laws and regulations of the U. S. Department of Housing and Urban Development.

---

Signature/Authorized Official

Date

Name

Title

Address

City/State/Zip

Telephone Number

- This certification does not apply.  
 This certification is applicable.

**APPENDIX TO CERTIFICATIONS**

Instructions Concerning Lobbying and Drug-Free Workplace Requirements

**Lobbying Certification**

This certification is a material representation of fact upon which reliance was placed when this transaction was made or entered into. Submission of this certification is a prerequisite for making or entering into this transaction imposed by section 1352, title 31, U.S. Code. Any person who fails to file the required certification shall be subject to a civil penalty of not less than \$10,000 and not more than \$100,000 for each such failure.

**Drug-Free Workplace Certification**

1. By signing and/or submitting this application or grant agreement, the grantee is providing the certification.
2. The certification is a material representation of fact upon which reliance is placed when the agency awards the grant. If it is later determined that the grantee knowingly rendered a false certification, or otherwise violates the requirements of the Drug-Free Workplace Act, HUD, in addition to any other remedies available to the Federal Government, may take action authorized under the Drug-Free Workplace Act.
3. Workplaces under grants, for grantees other than individuals, need not be identified on the certification. If known, they may be identified in the grant application. If the grantee does not identify the workplaces at the time of application, or upon award, if there is no application, the grantee must keep the identity of the workplace(s) on file in its office and make the information available for Federal inspection. Failure to identify all known workplaces constitutes a violation of the grantee's drug-free workplace requirements.
4. Workplace identifications must include the actual address of buildings (or parts of buildings) or other sites where work under the grant takes place. Categorical descriptions may be used (e.g., all vehicles of a mass transit authority or State highway department while in operation, State employees in each local unemployment office, performers in concert halls or radio stations).
5. If the workplace identified to the agency changes during the performance of the grant, the grantee shall inform the agency of the change(s), if it previously identified the workplaces in question (see paragraph three).
6. The grantee may insert in the space provided below the site(s) for the performance of work done in connection with the specific grant: Place of Performance (Street address, city, county, state, zip code) Check if there are workplaces on file that are not identified here. The certification with regard to the drug-free workplace is required by 24 CFR part 21.

Place Name	Street	City	County	State	Zip
Gastonia City Hall	181 S. South St.	Gastonia	Gaston	NC	28052
Garland Municipal Business Ctr	150 S. York St	Gastonia	Gaston	NC	28052

7. Definitions of terms in the Nonprocurement Suspension and Debarment common rule and Drug-Free Workplace common rule apply to this certification. Grantees' attention is called, in particular, to the following definitions from these rules: "Controlled substance" means a controlled substance in Schedules I through V of the Controlled Substances Act (21 U.S.C. 812) and as further defined by regulation (21 CFR 1308.11 through 1308.15); "Conviction" means a finding of guilt (including a plea of *nolo contendere*) or imposition of sentence, or both, by any judicial body charged with the responsibility to determine violations of the Federal or State criminal drug statutes; "Criminal drug statute" means a Federal or non-Federal criminal statute involving the manufacture, distribution, dispensing, use, or possession of any

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controlled substance; "Employee" means the employee of a grantee directly engaged in the performance of work under a grant, including:

- a. All "direct charge" employees;
- b. all "indirect charge" employees unless their impact or involvement is insignificant to the performance of the grant; and
- c. temporary personnel and consultants who are directly engaged in the performance of work under the grant and who are on the grantee's payroll. This definition does not include workers not on the payroll of the grantee (e.g., volunteers, even if used to meet a matching requirement; consultants or independent contractors not on the grantee's payroll; or employees of subrecipients or subcontractors in covered workplaces).

Note that by signing these certifications, certain documents must be completed, in use, and on file for verification. These documents include:

- 1. Analysis of Impediments to Fair Housing
- 2. Citizen Participation Plan
- 3. Anti-displacement and Relocation Plan



09/17/2014

Signature/Authorized Official

Date

Edward C. Munn

Name

City Manager, City of Gastonia

Title

181 S. South Street

Address

Gastonia, NC 28052

City/State/Zip

704-866-6756

Telephone Number

**CONSOLIDATED ANNUAL PERFORMANCE AND EVALUATION REPORT**  
**2013-2014 Program Year**

GENERAL
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**EXECUTIVE SUMMARY**

The Consolidated Annual Performance and Evaluation Report (CAPER) is an annual performance and evaluation report required by 24 CFR Part 91.520. The CAPER measures the actual performance of the City in meeting the goals and objectives described in the five-year Consolidated Plan (Con Plan).

U. S. Department of Housing and Urban Development Programs (HUD) that fund the City of Gastonia's Community Development Program include:

- the Community Development Block Grant Program (CDBG),
- the HOME Investment Partnership Program (HOME),
- Neighborhood Stabilization Program 1 (NSP-1),
- Neighborhood Stabilization Program 3 (NSP-3), and
- the Section 108 Loan Program.

The City of Gastonia is lead entity for the Gastonia/Gaston County HOME Consortium that includes Belmont, Bessemer City, Cherryville, Cramerton, Dallas, Gastonia, Lowell, McAdenville, Mount Holly, Ranlo, Stanley, unincorporated areas of Gaston County, and Kings Mountain.

The Downpayment Assistance Program for first-time homebuyer's (FTHB) is again our most successful program. During the program year, \$284,160.39 of HOME funds leveraged \$ 4,885,954 in private mortgage financing to assist 59 First Time Home Buyer (FTHB). Also 161 LMI individuals attended Homebuyer Education classes in which they were given information about Lead Based Paint hazards and their rights under the Fair Housing Act.

The Ten Year Plan to End Chronic Homelessness is a priority for the Continuum of Care and the Ten Year Plan was approved by City Council on May 05, 2009. The Continuum of Care Strategy has been very successful in the Tri-County Area (Gaston, Lincoln, and Cleveland). Homeless awareness is at an all time high, with consistent support from the 80+ helping agencies that are part of the network. A Day Center for the homeless continues to provide on-going services to the homeless population. Reinvestment In Communities of Gaston County, Inc (RIC) completed construction of four (4) units of affordable housing.

The downtown area continues to grow as a result of this funding initiative. During the 2013-2014 program year, more than four (4) new businesses located in the downtown area of Gastonia. The City provided grants through its Investment in Downtown Economic Assistance and Livability (IDEAL) Grant Program for upfits and renovation of existing buildings to new businesses through an application process. During 2013-2014 new grants totaled \$17,888.00.

In addition to the four (4) new businesses, a \$4 million dollar renovation of the Lawyer's Building is underway, which will be converted into an upscale hotel with 35 suites. The City is providing economic development grant for the project totaling \$808,000 over a ten-year period.

In 2009 the City of Gastonia was awarded \$2,600,000 as part of the Neighborhoods Stabilization Program – 1 through the Division of Community Assistance. Funds were used to develop sixteen (16) condominiums for homeownership for persons 120% LMMI and to acquire and rehabilitate eight (8) foreclosed units for homeownership for persons 50% of LMI or below families of which many are Individual Development Accounts (IDA) participants. Nine (9) condominiums and eight (8) single family houses have been sold. The City of Gastonia will continue to use Homebuyers Assistance Program downpayment funding for the remaining seven (7) NSP-1 condominiums.

Program Income generated through the sale of NSP-1 rehabilitation projects is currently being used to build new construction units. One project was completed during FY2013-14, and is currently being marketed toward eligible homebuyers.

The City of Gastonia assisted 50 City residents in 2013-2014 with City of Gastonia electric enterprise revenue funds, which are local funds, under the Gastonia Electrical Assistance Resource Program, (G.E.A.R), in the amount of \$12,420 by providing subsidized assistance toward monthly electric utility charges for whose incomes were <50% of AMI for family size.

In 2013-2014 Reinvestment in Communities of Gaston County (RIC) is working in the capacity as sponsor with Gaston Residential Services to develop an 8-unit residential multi-family development on East Second Avenue. CHDO funds in the amount of \$135,974 were used toward the project in addition to \$100,000 in HOME funds. Project completion is anticipated during FY 2014-2015.

In the **Highland East Neighborhood** the City purchased lots in an effort to eliminate slum and blight and to revitalize a deteriorating neighborhood. CDBG and HOME funds were used to purchase and demolish substandard structures and \$400,000 of local bond funds was utilized to improve both roads and water and sewer lines at Grace Street and Beatrice Costner Avenue. Reinvestment in Communities of Gaston County, Inc., completed two (2) duplexes in the community during the 2013-2014 program year. The City is still negotiating with other non-profits and for-profit groups to construct new

homes on these lots to benefit this LMI area. During the 2012-2013 year, the City of Gastonia submitted a letter of interest to the North Carolina Department of Commerce in an effort to secure a portion of Neighborhood Stabilizations Program (NSP-1) de-obligated funds for redevelopment of the shovel ready housing site.

The City of Gastonia has partnered with Hope 4 Gaston for the sixth year to provide minor housing repairs for LMI homeowners living in substandard housing. The City leveraged \$1,624.70 of CDBG funding with volunteers who donating labor services to LMI families residing in Gastonia to assist three (3) households.

During July 2013, the City of Gastonia Electric Department and the Housing and Neighborhoods Division attended an education fair hosted by the Gaston County Department of Social Services (DSS). During the fair, the Housing & Neighborhoods Division (Community Development) provided basic financial literacy education and informational resources to Gaston County foster children.

The City has assisted Atlanta-based Camden Development Group in securing FHA financing from HUD to redevelop the Loray Mill. The \$39 million first phase includes 190 loft apartments, 79,000 SF of commercial space and 34,000 SF of amenities including gym, swimming pool and event space. The property is located in Census Tract 329 which has a median family income of \$49,922 while HUD's family median income limits for the area is \$68,500. Construction for this project began April 2013 and is expected to have some commercial Certificates of Occupancy in December 2013.

The Housing & Neighborhoods Division has brought to the attention of the City of Gastonia Board of Adjustments restrictive setback regulations in the Highland Neighborhood. The Board of Adjustments has subsequently asked staff to look into the matter and suggest changes that may be recommended to City Council. The Division actively worked to address this matter during the 2013-2014 year.

Lead-Based Paint (LBP) is a major concern for a community such as ours, where a large portion of the existing housing stock was constructed prior to 1978. Staff is trained in LBP and is currently making sure our policies and procedures for our affordable housing activities meet the requirements listed in 24 CFR 35, Lead-Based Paint Poison Prevention in Certain Residential Structures. The City entered into a contract with a Lead-Based Paint testing firm, and the firm has addressed two (2) projects during the 2013-2014 program year.

Understanding the current economic environment and the challenges faced by all communities in our country, the City of Gastonia/Gastonia Consortium is progressively working toward our affordable housing, homeless intervention, and economic development goals listed in the 2010-2015 Consolidated Plan.

**CAPER**

***PUBLIC COMMENT PERIOD AND REVIEW***

***August 16, 2014 – September 16, 2014***

***CITY OF GASTONIA***

***Housing & Neighborhoods Division***

***150 S York Street, Garland Municipal Building 2<sup>nd</sup> Floor***

***(704) 866-6752***

**Fourth YEAR PROGRAM CAPER  
2013-2014**

**GENERAL QUESTIONS**

*(See attached IDIS Report PR26)*

**1. Assessment of the one-year goals and objectives:**

- a. Describe the accomplishments in attaining the goals and objectives for the reporting period.
- b. Provide a breakdown of the CPD formula grant funds spent on grant activities for each goal and objective. (See Performance Measures for expenditures)

Response

The City of Gastonia's overall goal of community planning and development programs included in the Consolidated Plan is to improve quality of life for eligible families and individuals and promote economic opportunities within the City by providing safe, decent affordable housing, economic development initiatives, and assistance for eliminating homelessness.

Gastonia's accomplishments over the past year have assisted the City/Consortium in meeting its annual goals and objectives as outlined in the Consolidated Plan.

**The Strategic Goals of the Gastonia Consortium are to:**

1. Promote safe, decent affordable housing;
2. Increase homeownership opportunities;
3. Ensure equal opportunity in housing;
4. Strengthening communities within the consortium;
5. Maintain high standards in accountability, management and ethical work practices;  
and
6. Promote the development and participation of community-based organizations including faith-based initiatives.

**In addressing the Strategic Goals of the Gastonia Consortium, the following policy priorities for the Consolidated Plan are:**

1. Provide increased opportunities for homeownership and rental housing for LMI persons with disabilities, elderly, minorities and families with limited English proficiency;
2. Promote improvement in the Gastonia Consortium Community;
3. Encourage Accessible Design Features and Energy Star participation;

4. Encourage removal of regulatory barriers to affordable housing;
5. Provide full and equal access to grass roots, faith-based and other community-based organizations as well as participation of minority and women-owned entities in the HUD-funded programs and projects; and
6. Promote the elimination of chronic homelessness.

The 2013-2014 Annual Action Plan identified the following Goals/Objectives:

**Housing Goals/Objectives:**

- a) Promote safe, decent affordable housing
- b) Ensure adequate affordable rental housing opportunities for very low income families and individuals (< 50% of AMI)
- c) Ensure adequate assistance for LMI homeowners
- d) Ensure adequate affordable housing opportunities for lower-income first-time homebuyers

**Continuum of Care Goals/Objectives:**

- a) Help low-income families (< 50% of AMI) avoid becoming homeless
- b) Address transitional housing needs of homeless persons
- c) Assist homeless persons in making the transition to permanent housing and independent living

**Non-Housing Goals/Objectives:**

- a) Encourage the delivery of human services to assist families in reaching their fullest potentials
- b) Support public facilities and infrastructure to provide safe, secure and healthy environments for families
- c) Expand economic opportunities for development of a strong diverse economic environment
- d) Revitalize declining neighborhoods in support of well planned neighborhoods for development of families and individuals

***The activities undertaken during the program year to address the goals and objectives identified in the Con Plan and 2013 - 2014 Annual Action Plan were:***

- a) Tenant and project based rental assistance provided through the Gastonia Housing Authority, Reinvestment in Communities, Inc. and City of Gastonia;
- b) Assisted fifty (50) households with incomes <50% of median with utility assistance through the City of Gastonia GEAR Program;
- c) The creation of 267 Section 215 housing opportunities;
- d) Provided health and safety repair assistance to seventeen (17) homeowners;
- e) Faith-based partnership with Hope 4 Gaston – Low Mod Area Benefit sweat-equity health and safety repairs to three (3) homeowners;

- f) Provided Homebuyer Education to 161 individuals;
- g) Provided Downpayment Assistance to 59 first-time homebuyers
- h) Provided tenant based rental assistance for permanent housing of homeless and soon to be homeless individuals and families -- assisted Thirteen (13) households;
- i) Construction of ten (10) units of affordable rental housing for homeless and special needs population in consortium area;
- j) Revitalization of neighborhoods through single family and multifamily rehabilitation and construction;
- k) Fair housing education and activities in partnership with the Gaston County Mediation Center, advertisements, Fair Housing Hotline, homebuyer education classes, and the housing forum;
- l) Continued expansion of the Continuum of Care Strategy and the Ten Year Plan to end Chronic Homelessness; and restructuring following new Hearth Act.
- m) Partnership agreement with RIC (CHDO) to expand housing opportunities and neighborhood revitalization; increase development in Highland East Neighborhood.
- n) As a result of receiving NSP-3 funding two (2) economic development project were completed in partnership with Landmark Development, LLC: (1) Redeveloped Marietta Apartments into a market rate multi-family development consisting of eighteen (18) units; (2) Completed the development of the historic Highland Memorial Hospital converting it into a senior multi-family housing unit consisting of seventy-five (75) one- and two-bedroom apartments.

**Programs developed to address the various activities are:**

- Health and Safety Repair Program – available to remove conditions which constitute an imminent threat to the health and/or safety of the residents of substandard housing structures and to abate existing hazardous living conditions;
- Downpayment Assistance Program – financial, technical and educational assistance available to assist with downpayment and closing cost;
- Tenant Based Rental Assistance – provides assistance to homeless persons in order to secure permanent housing that is safe and adequate;
- Security Deposit Only Program – provide assistance to homeless persons and those in threat of becoming homeless in order to secure permanent housing that is safe and adequate;
- Downtown Loan Program – provide gap financing to encourage revitalization of downtown properties;
- Acquisition/Rehab/Resale Program – acquire and rehabilitate existing substandard structures and resale for homeownership opportunities;
- New construction of affordable homes;
- Neighborhood Revitalization efforts;
- Relocation assistance for displaced families;
- Provide assistance for the homeless and special needs population
- Affirmative marketing of affordable housing;
- Providing assistance to the Gastonia Housing Authority and participation in the Family Self-Sufficiency (FSS) Program;

- Providing building sites, water/sewer taps, site clearance to Habitat for Humanity for low-income first-time homebuyers for development of homes for persons up to 50% of area median income;
- Providing water/sewer taps for very low-income families; and
- Community Economic Development.

**c. If applicable, explain why progress was not made towards meeting the goals and objectives.**

Response

Progress was made towards meeting the great majority of the goals and objectives identified in the Consolidated Plan and the 2013-2014 Annual Action Plan.

Item VI (B) of the CAPER Narrative Statement: There were few feasible opportunities for new housing construction due to the number of foreclosures currently on the market in Gastonia. The City has undertaken one (1) new construction project through the use of Neighborhood Stabilization Program-1 funds. The City shifted funding from new construction to the Homebuyers Assistance program to allow more LMI families to become homeowners.

Item IV (B) of the CAPER Narrative Statement: The City has developed an application and policies for this program and utilized this funding to assist five local non-profits with eligible administrative expenses.

Item VI (G) of the CAPER Narrative Statement: The City has developed a new written agreement with RIC in order to administer this funding; therefore the goals will be brought current in FY 2014.

***2. Describe the manner in which the recipient would change its program as a result of its experiences.***

Response

Due to the current economic crisis the City's focus has turned more toward economic development, homebuyers assistance concentrating on existing housing stock, housing rehabilitation using faith-based partnerships, and updating policies for assisting the our homeless population. Joblessness continues to be high in Gaston County, currently at 6.4% compared to 6.3 % for North Carolina (ranked 31<sup>st</sup>), and 6.3% for the nation. Our Needs Assessment identified families and individuals at or below 50% of the area median in greatest need of assistance. Due to our lack of funding for new construction of affordable housing, we have provided more funds through TBRA, homeowner health and safety repair programs and the homebuyer's assistance program.

### **3. Affirmatively Furthering Fair Housing:**

#### **a. Provide a summary of impediments to fair housing choice.**

Fair housing means the right to choose a place to live without regard to race, color, national origin, gender, religion, or because of a disability or minor children in the household. The federal Fair Housing Act (FHA) prohibits discrimination in the sale or rental of housing.

Under the FHA, state and local units of government that receive certain federal housing funds are not only required to refrain from discrimination; they must also take steps to advance the goals of fair housing and use their policies and programs to help promote open and inclusive patterns of housing. Specifically, all units of government that receive CDBG and/or HOME funds are required by the HUD to undertake an Analysis of Impediments to Fair Housing.

This Analysis to Impediments to Fair Housing (AI) covers the City of Gastonia and the Gaston Consortium area which includes the unincorporated areas of Gaston County and all the cities and will be included in the 2015 Consolidated Plan. This Analysis of Impediments to Fair Housing is an exploration of many housing and housing-related policies and practices in use throughout the Gastonia/Gastonia Consortium area that may inadvertently or deliberately prevent people from living where they choose. The analysis is not a fair housing plan for the jurisdiction; rather, it is a tool to assist in the development of the Annual Action Plan for fair housing activities. The analysis is also intended as an educational tool for housing planners, policymakers, housing providers, and other stakeholders in the community.

The Analysis was completed according to Affirmatively Furthering Fair Housing (AFFH) under Section 808 of the Fair Housing Act, HUD. According to HUD, the AFFH obligation requires each jurisdiction to:

1. Worked with the Centralina Council of Governments to conduct a study regarding impediments to fair housing choice. Known as the "Analysis of Impediments to Fair Housing Choice,"
2. Take appropriate actions to overcome the effects of any impediments identified through the analysis; and
3. Maintain records reflecting the analysis and actions in this regard.

The current Analysis of Impediments to Fair Housing was updated by the City of Gastonia's Housing & Neighborhoods Division from an original analysis conducted by the University of North Carolina at Charlotte, Department of Geography and Earth Science in cooperation with the City of Gastonia's Housing & Neighborhoods Office and an updated version in May 1, 2010. Information from the City of Gastonia, City Vision 2020, Gastonia's Comprehensive

Plan, Gastonia's professional staff, local banking institutions, the Gastonia Public Housing Authority, local realtors, and private organizations were used to prepare this Analysis.

**Identified Impediments:**

The City of Gastonia and the Gastonia Consortium is committed to non-discriminatory and equal opportunity housing within its boundaries. Support is provided through the City's Fair Housing Ordinance, a Fair Housing Officer and the design of programs that work to expand housing options for all people. Impediments to Fair Housing can be grouped into two major categories: (1) discriminatory practices and (2) market factors that have an impact on housing choice for members of protected classes.

Fair Housing and affordable housing have a correlation because the protected class members covered by the Fair Housing Act may include many of the same people that need affordable housing. Therefore, to insure Fair Housing, the expansion of affordable housing is a primary goal of Gastonia and the Gastonia Consortium.

The fair housing complaint and resolution process for the community allows people who feel they have been discriminated against to seek recourse through a local, State and Federal process. Potential impediments and recommendations to improve fair housing and housing choice are identified through data gathered from bankers, housing authorities, local and State Government, Federal resources and the private sector.

**Sale of New & Existing Housing:**

Realtors play an important role in encouraging fair housing choice. Historically, blockbusting and steering were techniques commonly used by realtors nationwide to prevent segregation of neighborhoods. Today, local realtors have increased knowledge of fair housing laws and work to uphold a code of ethics by the realtors association that includes the ban of any discriminatory practice. Realtors who join the local association receive specific training in a professional code of ethics.

There have been no documented cases of fair housing complaints filed against real estate agencies in Gaston County in the 2013 program year. In addition, there have been no reported complaints to the local realtors association. Although impediments in the actual sale process may exist, the greatest disparity is found in the loan process, which shall be addressed separately in this section.

**Aged Housing Stock:**

Aged Housing Stock has been identified as a problem in Gaston County with 46.4% of the housing stock that is pre-1978. Due to textile dominance of the past economy, Gaston County's many older houses, what have been commonly termed "mill houses", textile manufacturing plants, or mills, often provided housing for their workers. When textile manufacturers discontinued the housing options for workers, most of the units were sold. Many are now owned by the elderly population or have become rental housing. With this aged

housing stock, issues such as maintenance and lead-based paint have become primary concerns. These substandard rental units house some of the same people that are protected class members under Fair Housing laws and are scattered among many parts of the county near primary jobs in manufacturing. The City of Gastonia has a number of programs that assist low-income homeowners with rehabilitation or emergency repairs of older housing stock both inside and outside of the city limits. With this older housing stock, lead-based paint becomes an issue, particularly for families with young children; therefore, it is considered an impediment to fair housing because it limits housing choice for these families.

#### **Rental Housing:**

Housing units in Gaston County are 30.2% renter occupied. Historically, rental housing can be an area of deliberate discrimination by owners refusing to rent to a minority, a single mother or a disabled person. Landlords of rental housing may use tenant selection policies that result in discriminatory practices for protected class members through restrictive occupancy standards, refusal to accept government funded rental subsidies, minimum income standards and tenant screening reports. Although no housing discrimination complaints are recorded, housing discrimination may exist by private landlords that go unreported because of failure of protected class members to understand fair housing laws.

#### **Public Housing & Housing Choice Vouchers:**

Public Housing Authorities (PHAs) play an important role in furthering fair housing by developing, implementing, and evaluating policies and procedures that promote greater housing choice. Fair Housing Marketing Plans are important to ensure inclusion of all protected class members.

Public housing for the City of Gastonia is located in the west and northwest areas of the city in predominately African-American/Black neighborhoods thereby limiting housing choice for some renters. No new public housing has been built or acquired since 1971 and no new public housing is being planned by Gastonia. In order to further fair housing choice, the Gastonia Housing Authority (GHA) works to expand Housing Choice Vouchers housing in the county. To do this, GHA actively seeks landlords from all sections of the county. Additionally, GHA holds monthly landlord meetings to provide education on tenant screening, maintenance, free website listing and housing regulations in order to provide landlords the tools needed to be successful Section 8 landlords with successful tenants. The Gastonia Housing Authority (GHA) has for FY 2013 (10/01/2013 – 9/30/2014) 400 units of Public Housing and 1355 units of Housing Choice Vouchers. Currently the GHA is receiving funding for 100 non-elderly Disabled vouchers. Public Housing has 1723 households on the waiting list. Since each Public Housing physical location and the Housing Choice Voucher program keep their own wait list, it is very likely that some of the households will be duplicates due to multiple wait lists.

The housing units for Public Housing are 41+ years old; therefore, the units need some modernization. Most of the upgrades completed in the past 4 years have included much

needed water and sewer lines. As opportunities allow, the GHA will modernize units to include energy efficiency rated doors, windows, appliances and insulation to decrease energy use.

The Rental Assistance Demonstration (RAD) is a voluntary program of the Department of Housing and Urban Development (HUD). RAD seeks to preserve public housing by providing Public Housing Agencies (PHAs) with access to more stable funding to make needed improvements to properties. Currently the Gastonia Housing Authority (GHA) is undertaking RAD efforts at its Mountain View facilities located in Southwest Gastonia. During FY 2012, the GHA completed \$189,073 in Capital Improvements.

The Belmont Housing Authority has 50 units of public housing located in the southeast portion of the city. Currently reviewing its Five-Year Plan, the Belmont Housing Authority is considering additional housing based on need. This housing may be in the form of additional public housing or Housing Choice Vouchers.

In analyzing the information provided by the public housing authorities in Gaston County, there is a lack of marketing offered which ensures that all protected class members have housing choices through the authorities. Additionally, language barriers may exist for persons with Limited English Proficiency (LEP) due to on-site language proficiency or standard procedures that would assist these applicants.

#### **Advertising & Marketing Policies:**

Advertising in a manner that limits the type of tenant a landlord may accept can be a means of indirect discrimination. There were no specific phrases identified in the advertising section of local newspapers that would indicate housing discrimination. None of the ads reviewed indicated whether the unit had accessibility features for persons with disabilities. This can make it a very difficult and frustrating process for persons with disabilities to look for housing. Although no deliberate discrimination may exist within these ads, exclusions may exist which could be considered an impediment to fair housing choice.

Lack of knowledge of available services in a community may hinder protected class members from housing choice. Marketing plans do not always target lower income families or individuals especially minorities; any of which may tend to be the same as protected classes covered by the Fair Housing Act.

#### **Lending:**

CRA reports for a two year period from local lending institutions, BB&T and Bank of the Ozarks, were reviewed for discrimination of lending practices for protected classes applying for home mortgages. The reports did not indicate any discrimination practices based upon race, color, gender, religion or familial status. Loans were approved based upon ability to pay, job longevity, credit, and rental history. Loan rejections did not indicate an unequally high percentage of minorities or single female applicants.

### **Zoning & Land Cost:**

Zoning and land cost have historically been issues that often separate classes of people and often becomes an impediment to protected class members by restricting the location of housing. The west side of Gastonia has been overpopulated with lower income rental units. A Gastonia West Committee was formed that brought the issue of this imbalance in affordable rental housing units to the attention of governmental officials. In response, officials placed zoning restrictions with maximum units and census tracts throughout the city in an attempt to balance affordable rental housing. However, land cost on the east side of the city impedes the affordability of rental construction.

### **General Public Attitudes:**

Attitudes in a community can reject affordable housing and therefore fair housing choice for many of the protected class members. One of the most frequently cited impediments to fair housing choice nationwide is community and neighborhood opposition to affordable housing, frequently referred to as NIMBY – “Not In My BackYard.” This is not a new issue and Gaston County is no exception to NIMBYism. Neighbors frequently express concern about falling property values, increased crime rates and the safety of their children. Although there are many documented cases of affordable housing blending well with established neighborhoods, lack of education, fear and perception often take precedence in a developing community. Because Gaston County experiences the same perception that affordable housing means crime and unsafe streets, NIMBYism has been identified as an impediment to fair housing choice in this community.

### **Transportation:**

Transportation allows a person the means to choose housing in any part of a community. Lack of transportation options limit housing choice for protected class members because they must choose housing that is in close proximity to their jobs, education/training and needed services.

Gastonia has public transportation within its city limits which provides access to the local community college. In cooperation with Gastonia, the Charlotte Area Transit System (CATS) has express buses that make daily roundtrip stops in Belmont and Gastonia. This allows people, with limited transportation, access to higher paying jobs in Charlotte. Although Gastonia has been responsive to the needs of its citizens, it is limited to services within the city limits. No other city within the Gaston County municipalities has public transportation.

According to the 2005-2009 Census, 83.6 % of Gaston County workers 16 years of age and over drive alone to work in a car, truck or van. Another 10.7% of workers carpool and .9% walk to work. Only .4% of workers in Gaston County use public transportation for work. Interestingly, a Community Needs Assessment completed in 1998 by United Way of Gaston County, Inc. identified transportation as the third most critical need in the community. The Assessment states, “bus and taxi services are not available in many areas of Gaston County. Lack of adequate transportation provides hardships on individuals trying to secure and maintain employment, access child care or health services, obtain job skills training and other basic

family functions.” Today, transportation availability continues to be a dominant issue in Gaston County and an impediment to fair housing choice.

**Language Barriers:**

The face of the Gaston County community is changing. Ten years ago, the population of Gaston County had 3,326 residents five years of age and older that spoke English less than very well. According to the 2005-2009 Census, this increased to 8,672 residents. However this still represents 4.6 % of Gaston County’s overall population. The language barriers encountered by non-English speaking people can significantly impact the experience of obtaining housing, whether rental or homeownership. The U. S. Dept. of HUD recently prepared a draft policy guidance reminding state and local units of government that receive HUD funds of their responsibility to review existing procedures for ensuring access to federally-funded housing programs for all persons, including those with Limited English Proficiency (LEP).

In reviewing housing related services in Gaston County there may be a lack of interpreter services as well as printed information in languages other than English. Specific housing and housing related services identified in this search include: public housing, homeownership programs, home repair and rehabilitation, relocation assistance, notices of public meetings pertaining to redevelopment or re-zoning, statements and notices pertaining to property taxes, assessments and utility cut-off notices. The City of Gastonia has implemented a Language Access Plan (LAP) in an effort to assist this segment of the population obtain local program information in their spoken language.

**b. Identify actions taken to overcome effects of impediments identified.**

***Activities utilizing CDBG and HOME funds to “Affirmatively Further Fair Housing”:***

The City of Gastonia and the Gaston Consortium affirmatively supports Fair Housing and is committed to its funding and actions to help persons overcome barriers to their housing choice. The 2010/2015 Consolidated Plan indicates a number of activities that support fair housing and housing choice for low- and moderate-income households.

**Fair Housing Ordinance:**

The City of Gastonia adopted a Fair Housing Ordinance in 1982. The ordinance was updated in 1988, 1991 and 2002. The ordinance makes it illegal to discriminate in any way in relation to housing including the sale, purchase, rental of housing, in real estate transactions, or in the provision of brokerage services. The provisions of the ordinance include procedures for fair housing complaints and subsequent proceedings.

**Fair Housing Officer:**

The City of Gastonia, through CDBG Public Service Funds, provides a staff person to act as the Fair Housing Officer for the City. This program advertises in the local newspapers as well as the local cable government access channel to provide homebuyers, homeowners or renters an opportunity to report fair housing discrimination.

**Fair Housing Hotline:**

A Fair Housing "hotline", funded through CDBG funds, has been set-up for verbal complaints. The Fair Housing hotline registers between 25 & 35 calls per year. Statistics show that only two or three of the calls may be cases of discrimination. Most often the caller does not understand the difference between "unfair" and Fair Housing laws. Not all "unfair" practices by a landlord or someone else involved in a housing-related transaction with a consumer are covered by the Fair Housing Act. For example, a landlord that fails to make repairs may be acting "unfairly" but he/she is not in violation of the Fair Housing Act unless an action (or failure to act) is discriminatory based upon race, color, national origin, gender, religion, disability or familial status.

**Homeownership:**

The City of Gastonia's Homeownership Program, funded through the HOME Investment Trust Fund, has been in operation since 1996. The program assists LMI families and individuals with the purchase of a home by providing down payment and closing cost assistance in order to make homeownership more affordable while providing an opportunity for housing choice. The program has reduced home purchasing expenses through foregone or waived fees, including mortgage protection insurance, of more than \$4 million.

**Tenant-Based Rental Assistance & Security Deposit Only Program:**

Through HOME funds, tenant-based rental assistance has been effective in providing housing to homeless individuals and families with an adult member who is disabled and on limited income. The security deposit program assists homeless and those living in substandard housing to relocate to housing units of their choice in the consortium area that are decent, safe, and affordable.

**Community Development Programs:**

The City of Gastonia's Housing & Neighborhoods Division, through federally funded entitlement programs, actively engages in the practice of non-discrimination for all of its Community Development Programs. Program assistance is based upon need and focuses 100% on households at or below 80% of area median income (AMI).

**Public Services:**

The City of Gastonia and the Gastonia Housing Authority, in collaboration with Socialserve.com, provides a website (www.socialserve.com) with an affordable housing database. Housing Choice Vouchers and other affordable housing landlords may list available rental housing units in Gaston County free of charge. Units must be at or below Fair Market Rents established by the U.S. Dept. of HUD each year. The site also lists those units which are Accessible. The Gastonia Housing Authority, in partnership with the City of Gastonia, provides computer access to the website in their administrative lobby for families or individuals that have Housing Choice vouchers. The website is a positive tool in assisting Housing Choice Voucher holders to find affordable housing quickly. The website provides low income families with more housing choices. The site is provided at no cost by Socialserve.com because the City of Gastonia was one of the original sponsors in the initial development of the site.

**Citizen Participation Plan:**

To maximize citizen participation, outreach efforts include a series of public notices, public hearings, informal meetings, focus groups, solicited surveys, phone calls and personal contacts. All outreach is conducted under the supervision of the City of Gastonia Housing & Neighborhoods Division Staff. Particular effort is made to ensure input by low- and moderate-income residents including minority groups and citizens with special needs during the development of the CAPER as well as the final draft process. Public meetings and hearings are regularly scheduled at convenient times and locations to permit broad participation, particularly low-income persons and those that require handicapped accommodations.

The Housing & Neighborhoods Division provides a translator for non-English speaking residents during the citizen participation and public hearing process. An interpreter is provided for hearing-impaired residents. Such requests must be made to the City Clerk's office no later than 48 hours prior to the public hearing. Contacts are made with agencies that serve target groups in order to ensure participation by each group. The Gastonia Housing Authority assists the City of Gastonia Housing & Neighborhoods Division to include public housing residents in the planning process by disseminating information, providing notification of public hearings and encouraging residents' participation.

**Citizens Comments:**

There were no public comments received during the public hearings or the 30-day comment period.

***4. Describe Other Actions in Strategic Plan or Action Plan taken to address obstacles to meeting underserved needs.***

**Services for the Under Served – Need for Elderly Services:**

According to Gaston County's 2005-2009 census, the population of persons 65 and older is 26,279 or 13% of the population vs. the 1990 census of 21,093. This indicates a 15% increase in the elderly population. A national trend indicates continued growth in older populations due to increases in life spans. Gaston County's housing for persons age 62 and older has seen a moderate increase in availability during the last five years. Actions taken during this report period include the development of 40 units of affordable housing for the elderly. RIC and the CoC have completed ten (10) Section 811 units in 2013.

**Other Fair Housing Activities:**

It is the policy of the City of Gastonia to promote equal housing opportunity and cooperate to the fullest extent possible with HUD in furthering the goals of the Fair Housing laws. The purpose of the City's Fair Housing Ordinance is to provide all individuals with freedom from real estate discrimination because of race, color, religion, national origin, sex, familial status, or handicap. The ordinance also establishes a referral procedure for complaints and a proactive education program. The Fair Housing Officer has the following duties:

1. Maintains a telephone line for registering complaints and answering questions;
2. Conducts programs for the Board of Realtors and Home Buyers Association about Fair Housing;
3. Operates the Fair Housing booth at all available venues;
4. Designs programs for Fair Housing Month (billboards, newspaper and magazine articles, public television programs);
5. Attends seminars, meetings and workshops on Fair Housing;
6. Conducts monthly Fair Housing Education/Awareness Workshop;
7. Provides Fair Housing information in Spanish;
8. Subscribes to the Prentice-Hall Fair Housing/Fair Lending Service;
9. Checks local newspapers for discriminatory ads
10. Consults with newspapers on questionable ads, and;
11. Maintains the established goodwill with media, Home Buyers Association, Home Builders Association and Board of Realtors.

**Geographic Areas:**

African-Americans form the largest segment of the minority population and have the most housing problems. The City of Gastonia's greatest concentration of African-Americans is located in the central northwestern section called Highland, which is considered as an appropriate neighborhood revitalization strategy area by the City. Highland has concentrations of up to 83% minority populations in some census tracts, specifically census tracts 319 & 320. Many minority households experience lower median income levels than the general population. An African-American household with a median household income of \$28,474 could afford a housing purchase of approximately \$110,000; Gaston County's 2009 median housing value is \$124,000. This calculation is assuming a \$110,000 30-year mortgage at 5 % interest rate, including homeowners insurance and property taxes, and a

debt ratio of 30%. The City's Affordable Housing Programs have been very successful in assisting the minority populations with homeownership opportunities and affordable rental housing. The educational programs have been a strong tool against unfair lending practices and predatory lending.

The following table provides the **minority composition** of Gaston County as well as all of the cities and townships within the Gastonia Consortium. Overall Gaston County has a minority population of 24.2%. Traditionally **lower income households reside** in the same areas as the minority composition as indicated by the 2000 U.S. Census of Housing and Minority Rates of each city within Gaston County.

US Bureau of Census – American FactFinder: Demographic & Housing Estimates, 2010

Area	African-American	Asian	Hawaiian/ Pacific Is.	Native Amer.	White	Other Race	Two or More Races	Hispanic Ethnicity
<b>Gaston County (ALL)</b>	<b>15.3</b>	<b>1.2</b>	<b>0.0</b>	<b>0.4</b>	<b>78.2</b>	<b>3.4</b>	<b>1.5</b>	<b>5.9</b>
Belmont	8.9	4.1	0.2	0.3	83.6	1.6	1.4	3.5
Bessemer City	14.4	0.7	-	0.4	79.6	0.5	1.3	5.1
Cherryville	6.9	0.4	-	0.3	89.9	1.8	1.2	3.0
Cramerton	4.2	2.2	-	0.6	91.1	0.5	1.4	1.3
Dallas	15.9	0.6	-	0.4	<b>76.4</b>	5.2	1.6	8.0
Gastonia	27.8	1.3	-	0.4	<b>63.0</b>	5.2	2.2	9.6
Kings Mtn.	22.5	1.6	-	0.2	<b>73.0</b>	1.4	1.4	2.6
Lowell	8.7	1.0	0.1	0.5	85.9	2.9	0.2	5.7
McAdenville	2.2	0.9	0.2	1.5	89.2	5.1	1.1	5.7
Mount Holly	12.7	2.4	0.1	0.4	80.4	2.6	1.4	5.5
Ranlo	15.9	1.8	-	0.8	75.1	4.6	1.8	7.3
Stanley	9.7	0.4	-	0.4	87.6	0.9	1.1	1.6

Per U.S. Census: The six races may add to more than 100% because individuals may report more than one race.

The largest minority populations reside in Dallas with 23.6% (southeastern section of the town), Kings Mountain with 27% (northwestern section of Cleveland County) and Gastonia with 37% (central northwestern section of the city and south/southwestern section of the city).

**Homeless and Other Special Needs Activities – (See Continuum of Care & Homeless)**

**Other Actions – Institutional Structures and Delivery Systems:**

The City of Gastonia Housing & Neighborhoods Division is the lead entity for the City of Gastonia/Gastonia Consortium. To address fair housing concerns within the Consortium

area; the Housing & Neighborhoods Division coordinates its efforts with other public and private agencies within the jurisdiction. The City will continue to:

- Maintain a comprehensive community profile;
- Report on an impediments to Fair Housing
- Maintain strong current partnerships through community meetings
- Maintain partnership with the North Carolina Human Relations Commission as our main referral agency.

Program Specific Requirements – Affirmative Marketing Policy (See Attached)

Description of Actions to be Taken to Ensure the Suitability of Families to Undertake and Maintain Homeownership:

The City of Gastonia has implemented a Money Smart educational program to assist with financial stability of individuals and families that become homeowners. Money Smart focuses on individuals and families building financial assets and becoming financially independent.

The City of Gastonia's Homeownership program provides a Homebuyer's Education program that educates potential homebuyers from beginning of the process to maintaining the home. The class consists of presentations by realtors, mortgage lenders, and attorneys accompanied by written materials. Special emphasis is on pre-homeownership budgeting and credit so applicants will be prepared for homeownership prior to looking for a home.

A post-educational booklet is available for applicants after the closing. Additional post homeownership educational classes for protecting and preserving equity in homes and maintaining proper maintenance are being developed.

**Gastonia Housing Authority (GHA):**

The goal of the Community Services Department is to be the resource whereby residents are provided or linked to services in the community. We offer links to many opportunities and diverse services in the housing community so that residents are able to live in harmony in a community that is free from drugs and violent crime and move them toward economic self-sufficiency.

1. Families that are employed can benefit from an escrow account through FSS. Money is deposited into a participant's account and accumulates each month. This accumulation comes from the portion of the rent increase from earned income that would otherwise be paid by the family to the Gastonia Housing Authority. Once the participant has completed his/her FSS contract, it is the GHA's hope that the family will utilize the funds to become homeowners. Another incentive is a Homebuyer's Assistance Program through the City of Gastonia. They will match the escrow funds up to \$3500

\$5,000 to be used for down payment and/or closing costs. The Gastonia Housing Authority is committed to providing housing and assistance to individuals desiring to become self-sufficient

2. The purpose of the ROSS Elderly and Disabled Program is to provide the delivery and coordination of supportive services and other activities designed to help improve the living conditions of public housing residents who are elderly and disabled. The program will consist of classes that will educate the residents on Home Safety, Health & Nutrition, understanding Medicare and Medicaid, Arts & Crafts, Games, Outings, and more.

#### **5. Affordable Housing:**

##### **A. Housing needs of extremely low, low and moderate income renters and owners.**

The Gastonia Housing Authority is the one agency within our area, which consistently addresses the need of the very low, to low and moderate-income renters. The subsidized assistance through public housing and the Section 8 Program is a great asset to the locality. Due to the guaranteed rents more investors are bringing their properties in compliance with the HQS in order to rent to tenants with certificates or vouchers. The total benefit to very low and low-income families and individuals was 100% for the program year.

In 2012 the City was awarded NSP-3 funds in the amount of \$950,000 to leverage against \$14 Million to redevelop the Highland Memorial Hospital with 75 senior housing units to benefit clients at or below 50% AMI and the Marietta Street Apartments with 18 units at market rate rents to benefit clients at or below 120% AMI. The Highland Memorial Hospital Senior apartment has been funded with \$650,000 of NSP-1 and NSP-3 proceeds and the renovation has created 5 new hire Section 3 jobs for local residents. The NSP-3 Project was completed in July 2013, and the NSP-1 Project continues to progress toward completion.

Reinvestment In Communities continued a TBRA program that assisted 13 homeless or soon to be homeless person with permanent housing opportunities. Each person attends the SOAR education program to enable them a means to gain stability in their lives.

The Housing Rehabilitation Program is used to address the housing needs of existing homeowners. The Rehabilitation Program is structured to meet the needs of the very low, and LMI homeowners.

1. Homeowner Rehabilitation Program: HOME funds available for a major rehab of a qualified LMI homeowner. The structure is required to be repaired to City of Gastonia Minimum Housing Code standards.
2. Health & Safety Program: CDBG funds available to homeowners <50% AMI to remove conditions, which constitute an imminent threat to the health and/or safety

of the residents of substandard housing structures, and to abate existing hazardous living conditions.

3. The Home Energy Savers program assists LMI individuals resolve non-efficient usage of utility resources by repairing or replacing items with more energy efficient products.

The Homeownership Downpayment Assistance Program provides low and moderate income renters the information needed to make a choice between becoming a homeowner or continuing to rent. Through education and counseling services, persons learn about budgeting, credit, identity theft, record keeping, and the advantages and disadvantages of homeownership. The Money Smart education series provides financial literacy to enable renters to make better financial choices on the path toward homeownership. The program provide funds for downpayment when purchasing a home.

*B. Number of Section 215 housing opportunities created:*

Section 215 is defined under 24 CFR Part 92.252 as affordable rental housing and under 24 CFR Part 92.254 as affordable homeownership housing. Two hundred sixty-seven (267) units of Section 215 housing opportunities were created or are under construction for low/mod renters and homeowners. The goal outlined in our Consolidated Plan is to create as many affordable housing units as possible with a minimum of one hundred (100) units per year:

Downpayment Assistance Program: 59 units  
TBRA: 13 units  
Gastonia Housing Authority: (0) New Vouchers  
Habitat for Humanity: 3 units  
NSP-1: 24 units  
NSP-3: 93 units completed  
RIC: 4 units completed  
Continuum of Care: 61 units  
Gaston Residential Services: 8 units under construction  
Total Housing Units: 267

*C. Worst-case housing needs:*

The worst-case housing needs are defined as low-income renter households who pay more than half their income for rent, live in seriously substandard housing or have been involuntarily displaced and the needs of persons with disabilities are not met by beds in nursing homes or other service facilities. The worst-case housing needs were met through referrals to the Gastonia Housing Authority, transitional housing facilities and other providers of permanent housing with supportive services. Persons displaced by CDBG/HOME eligible activities are assisted in accordance with the Uniform Relocation Act.

Persons with disabilities are assisted through our rehabilitation programs or referral to other agencies. We also partner with non-profits such as Gaston Residential Services and Reinvestment in Communities to provide permanent or transitional housing for the disabled.

## **6. Continuum of Care (CoC):**

### **A. Actions taken to assist the homeless:**

The Annual Plan listed the development of a Comprehensive Continuum of Care Plan. The Plan has been developed and implemented through the Care Connection and the Mayor's Task Force on Homelessness. The **Care Connection** (Care through Action, Resolution, and Empowerment), the Continuum of Care's main working group has built upon 14 years of work by community task forces and committees to develop a comprehensive strategy to address homelessness in Gaston County, Lincoln and Cleveland Tri-County Area. Between 40 to 57 non-profit and governmental agencies have been actively involved. A Homeless Survey was administered to persons staying in all homeless shelters to establish a point-in-time count of the homeless persons in the community and to gather information from homeless individuals and families to develop the Continuum of Care Plan.

The City of Gastonia, through the Continuum of Care, has provided indirect assistance to homeless persons through the provision of technical assistance funds in compliance with HUD mandates including

- Point in time count
- Annual Homeless Assessment Report (AHAR) Homeless Management Information System (HMIS) data standards and data quality
- Homeless Data Exchange (HDX) implementation
- Housing Inventory Count and coordination of HMIS with Carolina Homeless Information Network (CHIN)
- CoC meetings/planning
- Technical assistance to coordinate CoC NOFA application process that funds renewals in both Gaston and Cleveland County agencies (members of CoC), who directly assist homeless
- Completion of Homeless Ten-Year Plan Accomplishment Report.

In addition, the City of Gastonia through the Continuum of Care has provided SOAR worker as resource for:

- Assisting homeless, disabled individuals with disability filing and appeals. Successfully completed 25 SSA disability approvals for homeless and disabled persons.
- Provided additional SOAR technical assistance training to 28 community workers.

Additional services for the homeless in the form of Tenant Based Rental Assistance to help citizens move from transitional to permanent housing and independent living was provided

through Reinvestment in Communities which assisted 15 homeless households in 2013/2014.

**B. Actions taken to plan and implement a continuum of care:**

Please see Continuum of Care tab.

**7. Foster Affordable Housing:**

Affordable Housing is promoted through our Affordable Housing Programs, collaboration with other housing service providers and public/private partnerships with local lending institutions. We promote homeownership through our Downpayment, Closing Cost Program and NSP-1 Program. We have assisted 59 families with downpayment assistance for first-time homebuyers. We also partnered with Habitat for Humanity to complete three (3) affordable homeownership single family units. We depend upon the Housing Authority to assist in meeting the needs of the low-income renter through the Section 8 program.

Through the Neighborhood Stabilization Program 1 (NSP1), the City of Gastonia has purchased eight (8) foreclosed properties and has completed rehabilitating these homes for resale to persons who are at or below 50% of AMI. All eight rehabilitated units were sold through the Individual Development Account (IDA) Program and to Homebuyer's Assistance Program participants. *(Note: The IDA program is now closed out and no longer available.)* Under the Neighborhood Stabilization Program, the City of Gastonia is redeveloping the Craig and Wilson Carriage Building, which is 100% complete, into 16 condominiums which will benefit those persons who incomes are up to 120% of the LMMI for the area. As of June 30, 2014, ten (10) units have been sold.

In 2012 the City was awarded NSP-3 funds in the amount of \$950,000 to leverage against \$14 Million to redevelop the Highland Memorial Hospital with 75 senior housing units to benefit clients at or below 50% AMI and the Marietta Street Apartments with 18 units at market rate rents to benefit clients at or below 120% AMI. The Highland Memorial Hospital Senior apartment has been funded with \$650,000 of NSP-1 and NSP-3 proceeds and the renovation has created 5 new hire Section 3 jobs for local residents. The project was completed by June 30, 2013.

Reinvestment in Communities (RIC) has continued to provide new opportunities for affordable housing with the construction of units with funding provided by a Section 811 grant to assist the disabled and administering TBRA.

RIC is provided \$30,000 in CDBG funds to assist the CoC in creating housing opportunities for the homeless and those in danger of becoming homeless to become self sufficient.

**8. Eliminate Barriers to Affordable Housing:**

According to the City of Gastonia's 2010 Analysis of Impediments to Fair Housing, the following issues have been identified as barriers to affordable housing:

- Lack of expedited approval process / building permits for affordable housing;
- Zoning and land cost in desired areas;
- Lack of amenities available;
- Building codes;
- Political pressure by citizens to deny affordable housing projects (NIMBYISM);
- Property tax rates.

Expedited Process:

In most jurisdictions, projects are approved on a first come, first serve basis without consideration that delays will increase cost for affordable housing construction.

Water & Sewer Utility System Expansion Fees:

The system expansion fee is required for new water or sewer service connections or proportional up-sizing of utility lines. The City of Gastonia assists LMI projects by waiving these fees for the following:

1. Fees are waived in the Development Incentive Area shown in the map section of this document containing the same title. The designated area is predominantly an LMI area.
2. Fees are waived for infill lots that have had a water or sewer tap in the past
3. Fees are waived for businesses meeting certain job creation thresholds.

Zoning & Land Cost:

The west side of Gastonia has been overpopulated with lower income rental units. Due to an imbalance in affordable rental housing units government officials placed zoning restrictions with maximum units and census tracts throughout the city in an attempt to balance affordable rental housing. However, land cost on the east side of the city impedes the affordability of rental construction. Duplex apartments are not considered multi-family but are not allowed "as of right" on lots other than corner lots without a zoning variance approval. The minimum lot size for a duplex must 16,000 SF. Zoning does not permit manufactured housing "as of right" within Gastonia city limits, and does not provide a density bonus sufficient to offset the cost of building below market units or allow accessory apartments either as exception or conditional use.

Amenities:

In areas where land cost may be more affordable there is a lack of amenities such as public transportation or the availability of water and sewer.

Building Codes:

Often building codes add additional cost to affordable housing projects. For example, requirement of new sidewalks even if older sidewalks already exist, new curbing, two parking spaces per housing unit even if it is subsidized housing where the majority of tenants will not have enough income to afford a vehicle.

NIMBYISM:

Community and neighborhood opposition to affordable housing, i.e. NIMBYISM– “Not in My Backyard” is extremely prevalent in the City of Gastonia and the Gastonia Consortium. Local neighbors and community leaders place political pressure on elected officials to deny approval of specific projects because of misconceptions that property values will decrease and crime will increase.

Property Tax Rates

Gaston County and the City of Gastonia have some of the highest property tax rates in the region. The 2010 Impediments to Fair Housing recommends that the City of Gastonia jurisdiction should convene or fund a comprehensive study to review the rules, regulations or development standards to assess the impact on the supply of affordable housing.

**9. Gaps in the Local Institutional Structure:**

Actions taken to strengthen identified weaknesses in the institutional structure established to carry out its strategy as proposed in the Consolidated Plan and Annual Plan for the performance period.

There were three areas of weaknesses identified in the Plan:

- a. Public awareness and local government commitment to affordable housing. The staff spoke to numerous groups and organizations about the need for affordable housing in the area and especially the special needs and at risk populations. The local news media has been very instrumental in creating public awareness with news articles and special interest stories on housing needs of the low and very low income and at-risk populations.
- b. Insufficient funds, both public and private. The City Manager has been instrumental in bringing the housing needs of the area to the forefront and with it the possibility of local financial commitment. Local lending institutions are implementing workable loan programs for low/mod applicants.

- c. Leveraging of Funds. The City continues to work with all mortgages lenders in the creation and implementation of the Community Reinvestment Act (CRA) Affordable Housing Programs and applying for grants for construction of special needs housing.

**10. Lead-Based Paint Hazard Reduction:**

The Health Department will continue to provide screening for lead poisoning, and the City will use CDBG and HOME funds as warranted to assist low and moderate-income families with lead-based paint hazard reduction concerns as part of the City affordable housing programs. The City will adhere to 24 CFR 35, Lead-Based Paint Poison Prevention in Certain Residential Structures as it applies to each program. The table on the following page is a summary:

**Summary of Lead Based Paint Requirements by Activity (24 CFR 35)**

	Homeowner & Rental Rehabilitation (Subpart J)			TBRA (Subpart M)	A,L,SS,O (Subpart K)
	≤\$5,000	\$5,000 - \$25,000	>\$25,000		Homebuyer & Special Needs*
<b>Approach to Lead Hazard Evaluation &amp; Reduction</b>	1. Do no Harm	3. Identify and control lead hazards	4. Identify and abate lead hazards	2. Identify and stabilize deteriorated paint	2. Identify and stabilize deteriorated paint
<b>Notification</b>	Yes	Yes	Yes	Yes	Yes
<b>Lead Hazard Evaluation</b>	Paint Testing	Paint Testing and Risk Assessment	Paint Testing and Risk Assessment	Visual Assessment	Visual Assessment
<b>Lead Hazard Reduction</b>	Repair surfaces disturbed during rehabilitation	Interim Controls	Abatement (Interim Controls on exterior surfaces not disturbed by rehabilitation)	Paint Stabilization	Paint Stabilization
	Safe work practices Clearance	Safe work practices Clearance	Safe work practices Clearance	Safe work practices Clearance	Safe work practices Clearance
<b>Ongoing Maintenance</b>	Rental Only	Rental Only	Rental Only	Yes	Yes (if ongoing relationship)
<b>EIBLL</b>	No	No	No	Yes	No

Requirements					
<b>Options</b>	Presume LBP Use safe work practices on all surfaces	Presume LBP and/or hazards Use standard treatments	Presume LBP and/or hazards Abate all applicable surfaces	Test deteriorated paint. Use safe work practices only on LBP surfaces	Test deteriorated paint. Use safe work practices only on LBP surfaces
* Special Needs Housing may be subject to the requirements of Subpart J, M, or K depending on the nature of the activity undertaken. However, since most special needs housing involves acquisition, leasing, support services, and operations, for the purposes of this table, it has been placed in this column.					

Building HOME

U.S. Department

of Housing and Urban Development

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**11. Antipoverty Actions:**

The Gastonia/Gaston County Consortium, through Gastonia Housing Authority, has in place a program structured to prevent low-income families from becoming homeless. GHA reports an increasing number of families requesting assistance. Plant closings and corporate downsizing hamper the ability of these families to survive financially. Case managers encounter more families who have obsolete job skills. Many wage earners are also victims of technology. As technology and antiquated job skills erode the financial well being of these families, many of them face homelessness. Program specialists help with job search and placement, childcare, and human resource development and training. Supportive services and Reality Therapy counseling help rebuild self-esteem and job-training helps refurbish out-of-date job skills. The staff teaches clients financial management skills and encourages them to return to school. The Total Family Assistance Program attempts to:

- a. help families work together in order to achieve self-sufficiency
- b. help families assess their strengths and work together as a team to achieve economic stability to take charge of their lives
- c. work with heads of households to market themselves more effectively to find better jobs, budget their money, and to find a better place to live, and
- d. work with children to help them understand that the road to a better life includes family cooperation.

Through a grant from Electricities, the City of Gastonia assisted fifty (50) households with incomes <50% of median with utility assistance through the City of Gastonia GEAR Program. The GEAR Program assists Gastonia residents with very low incomes to manage and afford electric services and is available to both homeowners and renters.

### **12. Local Monitoring and Compliance:**

The City of Gastonia Housing & Neighborhoods Division will conduct monitoring reviews of all sub-recipients semi-annually to make sure the programs are being carried out as specified in a timely and productive manner. The responsibilities of the Finance/Contract Compliance Officer are to track all project activities for productivity and compliance. The FCCO sets benchmarks for each project and monitors each one accordingly. All housing provider agencies will be contacted on a quarterly basis to assess needs and funds availability. The City will serve as a clearinghouse for other agencies by making sure they are responsive to all NOFA'S and offer technical assistance as needed. See Monitoring Plan Section

The Housing & Neighborhoods Division will meet with the local lending institutions, non-profit, for-profit, private organizations and the Gastonia Housing Authority on a quarterly basis to determine the success and or changes in the various programs as needed.

### **13. Leveraging:**

The City of Gastonia leveraged private dollars this fiscal year to assist with the Downpayment and Closing Cost of our LMI homebuyers. Some existing homeowners matched private funds with the rehab assistance in the rehabilitation of their property. The local lending institutions provided permanent financing for the Homebuyers Program. The City continues to work with mortgage lenders in the creation and implementation of their CRA Affordable Housing Programs. The City of Gastonia leveraged \$284,160.39 in HOME Funds to provide \$4,885,954.00 in private mortgage financing for 59 families. The client investment for the Homebuyer Program was \$71,862.45. Successful leveraging by the City of Gastonia also included the following:

- \$12,420 under the Gastonia Electric Assistance Resource (GEAR) Program provided utility assistance to 50 low income families/individuals.
- \$440,000 2/3 Bond funds and \$60,000 in Water & Sewer funds were leveraged on Grace Street and Beatrice Costner Ave for infrastructure improvements in Highland East.
- \$8,800,000 for economic revitalization for construction of Gastonia Conference Center.
- \$60,000 for construction of pedestrian plaza for downtown area.
- \$40,000 for development of Downtown Park to eradicate slum and blighted structures.
- \$600,000 for improvements to Marietta and Franklin Boulevard.
- \$427,000 leveraging by Reinvestment in Communities for 4 units of special needs housing.
- Optimist Club Park, located near the Loray Mill, is 6 developed acres, and consists of a playground, open space, picnic area, walking trail and butterfly garden. In

November 2013, phase one of Optimist Club Park opened. Phase two will create a connecting trail between the park and the West Gastonia Boys' and Girls' Club property. The park is the result of a major public/private/non-profit partnership between the West Gastonia Optimist Club, the City of Gastonia, and the West Gastonia Boys' and Girls' Club.

**14. Citizens Comments:**

No public comments during the public comment period.

**15. Self-Evaluation:**

The overall goal of Housing & Neighborhoods is to develop viable communities by providing decent housing and a suitable living environment and expanding economic opportunities for LMI persons. The activities and strategies used by Housing & Neighborhoods have made and are continuously making an impact on identified needs. Rehabilitation and infill new construction has increased the tax base as well as assisted in revitalization of neighborhoods. Life skills training, development and education have played a significant role in empowering residents for increased economic opportunity.

The Down payment Assistance Program is a very successful homebuyer program. The housing counseling, both pre-counseling and post counseling has proven beneficial for all concerned. The construction of new housing through our HOME Program with the assistance of the CHDO has added quality affordable housing to the market and increased the tax base for the area.

Financial Fitness education is provided to LMI individuals or families who are at various stages of their life. Some clients are currently housed at the Salvation Army, others in public housing. These courses were designed to give basic information to help them establish some general guidelines on how to get their life back on track. The education course typically is 1-2 hours depending on the amount of clients and their participation. Topics include basic banking practices:

- using debit cards;
- writing a check;
- balancing checkbooks;
- how to apply and use credit properly and safely;
- budgeting when funds are limited;

Some of the barriers we face are:

- funding
- lack of local commitment to affordable housing
- citizen apathy
- local zoning issues
- negative attitude toward government developing housing

Our funding sources are CDBG, HOME, NSP-1, NSP-3 and Section 108 Loan funds. All of our funds are being committed and disbursed in a timely manner.

We have several projects under consideration. We have identified two Homeownership Zones in communities that are showing some signs of deterioration. Our major projects are on target. One area of concern is the pre-1978 existing rental housing and lead-base paint.

Changes that need to be made for a more effective program are:

- new marketing strategies for the rehabilitation programs for LMI homeowners
- economic development activities
- increased leveraging of private funds
- greater citizen participation
- increased fair housing activity
- special emphasis and outreach to the Hispanic community – which is a priority of the Division.

**Questions:**

**Are the activities and strategies making an impact on the identified need?**

- The Downpayment Assistance Program has a tremendous impact on the need for affordable housing for homeownership. The number of participants attests to the successfulness of the program. The City and County are seeing increased tax base and the revitalization of neighborhoods.
- The Education and counseling programs provided by the City and sub recipients has encouraged homeownership activity.
- Homeless awareness is at an all time high within the Tri-County Continuum Area. The Faith-based community provides services, case management and transitional housing for the homeless community. Also the construction of 4 units of permanent supportive housing for chronically homeless was provided.
- Single-family rehab and new construction has added to neighborhood revitalization and increased community pride.
- Neighborhood revitalization efforts and community pride has expanded to other areas of the City.
- The HOME program has provided a resource for the unincorporated areas of the County to receive financial housing assistance.
- The Downtown 108 Loan Program has increased revitalization in the downtown area.
- Development of special needs housing and the TBRA programs have provided housing opportunities to persons that did not have options in the past and addresses a major need in our community.

**What barriers may have a negative impact on fulfilling the strategies and your view?**

- Lack of available funding to meet goals and objectives
- Local regulatory barriers to affordable housing
- Cost of developing housing for homeless and special needs population

**Overall, what is the status of the grant programs?**

- The City has been able to meet the timeliness guidelines and the HOME program spending requirements. The programs are very successful and an asset to our community. Without the HUD program funds, many of our low and very low-income citizens would not experience some degree of change in their quality of life.

**Are any activities or types of activities falling behind schedule?**

- The "Gateway Village" development in Highland has slowed due to the economy. The slum and blight has been reduced and infrastructure improvements have been completed; however housing starts have slowed due to the economy.

**Are grant disbursements timely?**

- The City works on a reimbursement basis and all disbursements are expended within the required time.

**Do actual expenditures differ substantially from letter of credit disbursements?**

- The City only draws funds on what has been expended.

**Are major goals on target?**

- Yes, major goals are on target, such as: the development of 75 LMI senior housing unit at the Highland Memorial Apartments, the redevelopment of 18 market rate historic apartments at Marietta St/Armstrong Apartments that were classified as slum and blight and financing for phase I of the Loray Mill a \$39 million residential and commercial redevelopment of a close 500,000 SF mil.

**What adjustments or improvements to strategies and activities might meet your needs more effectively?**

- The City used the development of the new 5-year Consolidated Plan as an opportunity to build new partnerships to better serve the needs of the low and very low income community.
- Capacity-build the Continuum of Care to improve and develop strategies for the homeless and special needs population

- Housing & Neighborhoods staff is working to collaborate more than ever with local non-profits and faith based organizations to improve leverage and community impacts.
- Continued enhancements of the Performance Measurement System

**COMMUNITY DEVELOPMENT BLOCK GRANT NARRATIVES:**

**A. Relationship of CDBG/HOME/Section 108 Expenditures to Plans and Strategies**

**1. Priority #1 Renters: Single-family small related and Female Heads of Household**

Activities undertaken: Tenant-based rental assistance and Security Deposit Only Program

Reinvestment in Communities

- TBRA: 13 Households
- Security Deposit Only Program: 0 Household
- Total TBRA: 13

Geographic Distribution: HOME funds for the TBRA Program were used throughout the Consortium Area. (See attached map)

Matching Contributions: See Match Report for HOME Funds

Pattern of Investment: The tenant and project based rental assistance programs administered by the Gastonia Housing Authority were carried out as planned. The GHA takes applications for assistance on a limited basis due to the length of its waiting list and the availability of existing vouchers and certificates.

**1. Priority #1 Existing Homeowners: Single-family small and large related, female heads of household and elderly**

Activities undertaken: Moderate/Substantial Rehabilitation

Available Resources: CDBG, CDBG-R, and HOME Funds – The CDBG, CDBG-R, NSP and HOME funds were used for the rehabilitation of properties in the form of a grant or deferred payment loan. Eighteen (18) units including emergency repairs and water/sewer hook-ups were completed during the report period. Program income from NSP-1 and grant funds from NSP-3 were leveraged to create Seventy-Five (75) rental units at or below 50% AMI.

Geographic Distribution: CDBG and CDBG-R funds were used within the city limits of the City of Gastonia and HOME funds were distributed on a City/County wide basis within the consortium boundaries. (See attached map)

Matching Contributions: See Match Report

Pattern of Investment: CDBG and HOME funds were invested as planned.

Total number of units projected in the Annual Plan: 25  
Total number of units under construction during report period: 0  
**Total number of units completed during report period: 91**

0 – 30% planned:		Completed:	
31 – 50% planned:	25	Completed:	91
51 – 80% planned:		Completed:	

### 3. Priority #1 Owners: Homebuyers Assistance

The ConPlan identified the need for affordable housing programs that would assist low/mod income families in purchasing homes.

Activities undertaken: New construction and acquisition of properties; Downpayment and Closing Cost assistance and subordinated mortgages. All applicants were first-time homebuyers.

Total number units projected in the Annual Plan:	50
Down payment and Closing Cost Assistance:	59
Technical Assistance and purchase:	1

Available Resources: HOME

Geographic Distribution: The City of Gastonia CDBG funds for land acquisition is to be used within the city limits of Gastonia and HOME funds may be used in the consortium area for Homebuyers Assistance, Acquisition, and New Construction. The City of Gastonia and the unincorporated areas of the County make up the Consortium Area. There were no targeted areas for use of CDBG and HOME funds.

Matching Contributions: See Match Report

Leveraging of non-federal funds: The CDBG, CDBG-R, NSP-1, NSP-3, 108 Loan, and HOME funds were leveraged with private funds from local lenders and other non-profit organizations. The Gastonia Community Reinvestment Affordable Housing Program is a public/private partnership effort between the City of Gastonia and local lending institutions to provide mortgage financing for first time homebuyers. The program provides an affordable source of financing to those persons whose income is 80% or less of the area median income.

The participating lending institutions developed affordable lending programs as a result of satisfying the Community Reinvestment Act (CRA). Each lending institution has established loan-underwriting criteria, which will allow a significant higher number of applicants to qualify for mortgage financing for homeownership.

All CRA Loans are made directly between the applicant and one of the participating lending institutions. In exchange for the lending institutions providing loans under favorable terms, the City of Gastonia has agreed to several measures that reduce the cost and risks to the lenders providing these loans. These measures include program administration, the pre-qualifying of eligible applicants, conducting inspections and coordinating the draw process.

Pattern of Investment: The funds were invested as planned.

Total number of units projected in the Annual Plan:	50
Total number of units completed during the report period:	59

Objective B: Activity – Acquisition/Rehab/Resale Affordable Housing Program

The purpose of the program is to acquire substandard units that are suitable for rehab and resale to first time homebuyers.

Activities undertaken: Acquisition and rehabilitation

Total number of units projected in the Annual Plan:	2
Total number of units completed:	2

Available Resources: NSP-1

Geographic Distribution: Consortium Area

Leveraging of non-federal funds: Local lending institutions provided permanent financing

Matching Contributions: See Match Report

Pattern of Investment: The funds were invested as planned.

Total number of units projected in Annual Plan:	7
Total number of units completed during report period:	8

**The low and moderate-income benefit was 100% in all project activities**

***B. Changes in Priorities and Objectives***

There were no changes in priorities or objectives for the program year.

***C. Planned Activities***

All resources identified in the plan were pursued. The Continuum of Care and the Mayor's Task Force on Homelessness handle the Super NOFA Process. Agencies submit applications for funding and prioritized by the Task Force. Each participating agency of the Care Connection is provided an opportunity to apply with one application for all available programs. The City of Gastonia has provided Certifications of Consistency for all requesting

agencies in accordance with the Consolidated Plan. None of the identified goals in the Consolidated Plan were hindered through actions of willful inaction.

#### **D. National Objectives**

All eligible activities met national objectives as outlined in the Narrative Statements located under the Performance Measures Tab

#### **E. Displacement**

The Highland Neighborhood Plan and the Highland Plaza Retail Center are activities that involved acquisition and demolition of occupied real property. The properties are located within a planned community economic development project. The City of Gastonia is purchasing houses for rehab and resale and vacant lots for in fill new construction. The acquisition – rehab – resale program will be used to assist families 50% and below the area median income to become homeowners. The Gastonia Housing Authority will supply applicants through the, Housing Choice Voucher and FSS programs.

1. Steps taken to minimize the amount of displacement  
No households or businesses were displaced as a result of CDBG, CDBG-R, NSP-1, 108 Loan, or HOME activities during 2013/2014.
2. Steps taken to identify households, businesses, farms or non-profit organization who occupy the site of a CDBG-assisted project subject to requirements of URA or Section 104(d)
  - Prior to the time of acquisition, the Housing & Neighborhoods staff interviewed all families, individuals, business concerns and non-profit organizations that will be displaced to obtain information upon which to plan for housing and other accommodations, as well as counseling needs. These surveys show composition of the family by individuals, age, sex and the number of bedrooms needed. An updated survey is made to obtain preference as to sale or rental housing, preference as to location, ability to pay standards and special medical problems, which would affect housing needs.
3. A description of steps taken:
  - Interview with site occupants for the purpose of establishing relocation records and determining eligibility for relocation benefits. During the interview following acquisition, the relocation specialist will deliver the **INFORMATIONAL STATEMENT** and secure a receipt for it; collect and update information on relocation records so as to determine each site occupant's re-housing requirements.
  - A checklist is placed in each file to ensure notices are given on time.

## **F. Economic Development**

The City of Gastonia received CDBG-R funds in the amount \$171,503. The City used the funds to assist low-income families with energy improvements and provided supplemental funding for economic redevelopment within the Gastonia downtown area. The City coupled the CDBG-R with 108 Loan funding specifically for the Webb Theater project. By partnering with a private developer, funds under these grants were used to renovate the existing Webb Theater for use as a restaurant. Nick's Steak & Tap House is complete and continues to be a stabilizing entity in downtown. The CDBG-R completed during the 2011-2012 program year.

First Legacy Community Credit Union has opened on the corner of HWY 321 and Rankin to serve as their main branch for Gaston, Lincoln, and Cleveland counties. The project leveraged CDBG and 108 Loan funds with private investment to create 5 new jobs and has continued to be a positive impact in the Highland East Neighborhood.

### **1. Limited Clientele Activities**

RIC assisted more than 50 local non-profits through the CoC supplying much needed grants information about the NOFA and assisting with reporting techniques and requirements.

### **2. Program Income**

CDBG and HOME Program income received was applied to eligible program activities. (See CDBG and HOME financial reports).

## **III. HOME NARRATIVES**

- A. See part II of report
- B. HOME match report (see HOME Reports tab)
- C. Miscellaneous HOME Narratives
  - 1. See attached M/WBE Report
  - 2. Minority Outreach

We have five minority contractors on our approved contractor list. Participation by minority owned businesses has increased by at least 1.5%. Minority and women owned real estate firms have been very active in our affordable housing programs.

The Consortium has set forth the following actions to ensure outreach to minorities and to increase minority participation in HOME supported projects.

- Advertise in local minority newspapers and magazines
- Provide technical assistance to rehabilitation contractors
- Provide names and addresses of all subcontractors with a recommendation to utilize the services of minority subs
- Notify minority owned firms of contract opportunities by special outreach efforts
- Maintain a list of minority owned or operated businesses
- Elimination of performance bond requirements
- On a case by case basis extend construction advance payments to contractors
- On-site inspections of rental properties
- Affirmative Fair Marketing Plan
- Development of a Section 3 Program for eligible contractors.

The City has used HOME funds for construction of multi-family units through RIC, the City's CHDO. In accordance with our policy and our affordable housing programs we do inform the public, potential tenants, homeowners and investors about Federal Fair Housing and Affirmative Marketing.

Affirmative Marketing actions during the program year: Actions listed under Fair Housing Section of Narrative Statements.

- placed special public notices in the local newspapers
- participation with the Ministerial Association
- attending local Chamber meetings
- providing Housing Forum
- Meetings with Veterans groups
- Provider Network group meetings
- Participation in the Downtown Faith Network (DFN)
- provided informational fliers about the HOME program and Fair Housing to applicants
- used billboards to advertise properties for sale
- special outreach made to the racial/ethnic group who would not likely apply for housing without special outreach (beauty and barber shops, churches, library)

Summary of Results of On-Site Inspections of HOME Rental Units – The City of Gastonia inspects all HOME rental units developed and owned by RIC, the City’s CHDO. The following units were inspected during the program year with inspection reports for each project located in the project file. All units inspected were found to be in compliance with local codes and Housing Quality Standards (HQS):

- Redbud: 4 units – In compliance
- Cherokee Street: 12 units – In compliance
- Boyce Street 4 units – In compliance
- Willow Street 11 units – In compliance
- Erin Drive 1 unit – In compliance
- Third Avenue 7 units – In compliance
- Kinross Place 12 units - In compliance
- Highland 4 units – In compliance

**IV. HOPWA Narratives**

In February 2014, Family Service of Gaston County, Inc. awarded funding for Housing Opportunities of Persons with AIDS (HOPWA), however the agency has since closed its doors as of July 2014. The Carolina Care Connection, House of Mercy, Family Promise of Gaston County, Inc. and Community Link – NC are other agencies also receiving HOPWA funds that service Gaston County.

**V. ESG Narratives**

Several agencies in Gaston County receive Emergency Shelter Grant (ESG) Funding and agencies are listed as follows:

**Cleveland County Abuse Prevention**

Emergency Shelter: \$9,000

**Family Promise Of Gaston Co.**

Emergency Shelter: \$4,693

**Lincoln Co. Coalition Against Domestic Violence**

Emergency Shelter: \$9,000

**Shelter of Gaston Co.**

Emergency Shelter: \$6,459

**VI. Rapid Re-housing Grant Funding**

The following agencies that serve Gaston County received funding from the NC N.C. Department of Health and Human Services Housing and Homelessness Unit-Division of Aging and Adult Services for Rapid Re-Housing. The agencies are as follows:

**Cleveland County Abuse Prevention**

Rapid Re-housing: \$32,227

**Family Promise Of Gaston Co.**

Rapid Re-housing: \$32,227

***VII. Citizen Participation Requirements***

Housing & Neighborhoods staff will hold a public hearing on August 18, 2014, at the Gaston County Library. Staff attends various neighborhood meetings and area workshops to provide affordable housing program information as well as obtain input from the public.

Housing & Neighborhoods staff also had a copy of the proposed CAPER placed at various locations, detailed in Tab 3, from August 16, 2014 through September 16, 2014 for review for public comment. There were no comments during this period or at public hearings. H&S staff will work through the upcoming year to enhance citizen participation through more public outreach.

# CAPER

## Narrative Statement Performance Measures 2013-2014 FISCAL YEAR

### I. PROGRAM ADMINISTRATION

- A. General Administration: (CDBG Funds) \$132,301** – Funds allocated for salaries, fringe benefits and general expenses for administration of the Housing & Neighborhoods Community Development Programs (i.e. legal fees, supplies, dues and subscriptions, advertising, etc.); **(HOME Funds) \$55,346** – Funds to supplement salaries and general expenses for the administration of the HOME Program.

*Strategic Goal:* Maintain high standards of accountability, management and ethical work practices  
*Matrix Code:* 21A General Program Administration 570.206  
*Specific Objective:* N/A  
*Proposed Outcome:* Successful administration of CDBG & HOME Programs  
*Performance Measure:* Approval of Consolidated Annual Performance & Evaluation Report and Annual Action Plan by U.S. Dept. of HUD

**B. Project Delivery Costs: (CDBG Funds) \$27,569 -**

Funds allocated for salaries, fringe benefits and general expenses in the execution of the rehabilitation/new construction, affordable housing programs.

*Strategic Goal:* Promote safe, decent affordable housing  
*Matrix Code:* 14H Rehabilitation Administration 570.202  
 13Direct Homeownership Assistance 570.201(n)  
*Specific Objective(s):* Decent Affordable Housing  
*Proposed Outcome:* Affordability  
*Performance Measure:* 90% of units inspected will receive rehabilitation assistance or down payment assistance

**C. Section 108 Loan: (108 PI Funds) \$217,400** – Loan Repayment on Section 108 loan programs.

*Strategic Goal:* Promote safe, decent affordable housing  
*Matrix Code:* 19F Planned Repayment of Section 108 Loans P&I  
*Specific Objective(s):* Decent Affordable Housing  
*Proposed Outcome:* Affordability  
*Performance Measure:* 100% required payment completed

### II. COMMUNITY HOUSING DEVELOPMENT ORGANIZATION (CHDO): (HOME Funds – set-aside) \$83,019

Mandated 15% of HOME allocation reserved for certified CHDO's for the development affordable housing for low/mod income families and individuals.

*Strategic Goal:* Promote safe, decent affordable housing  
*Matrix Code:* 12 Construction of housing 570.201(m)  
*Specific Objective(s):* Increase the supply of decent affordable housing  
*Proposed Outcome:* Affordability

*Performance Measure: Predevelopment and construction of 7 units*

### **III. COMMUNITY HOUSING DEVELOPMENT ORGANIZATION (CHDO): (HOME Funds – capacity building/operating expense) \$20,000**

Eligible funding, not to exceed 5% of HOME funds, available to certified CHDO's for capacity building activities and operating expenses for use with set-aside funding.

*Strategic Goal: Promote the development and participation of community-based organizations*  
*Matrix Code: 21 I HOME CHDO Operating Costs*  
*Specific Objective(s): Improve access to decent affordable housing*  
*Proposed Outcome: Affordability*  
*Performance Measure: Satisfactory monitoring of projects with 95% client file accuracy*

### **IV. PUBLIC SERVICES**

**A. FAIR HOUSING/MBE: (CDBG Funds) \$7,992** – Funds allocated for general expenses for fair housing administration, fair housing activities, fair housing hot line and minority recruitment of contractors.

*Strategic Goal: Ensure equal opportunity in housing*  
*Matrix Code: 05J Fair Housing activities (CDBG) 570.201(e)*  
*Specific Objective(s): Improve access to decent affordable rental housing  
 Improve access to decent affordable owner housing*  
*Proposed Outcome: Availability/Accessibility*  
*Performance Measure: 100% of persons with fair housing inquiries will receive assistance and fair housing issue will be resolved or referred;  
 100 persons will receive fair housing education in conjunction with the homebuyer education and counseling program*

**B. SUBRECIPIENTS: (CDBG Funds) \$5,000** – The City of Gastonia through its Citizens Participation Process has developed a Consolidated Plan that lists local housing and non-housing community development priority needs. The Non-profit Reimbursement Program is designed to assist Continuum of Care and other service providers serving low/mod income limited clientele, with supplies and equipment needed for operation.

*Strategic Goal: Strengthen communities within the Consortium*  
*Matrix Code: 05 Public Services (General) 570.201(e)*  
*Specific Objective(s): Suitable Living Environment*  
*Proposed Outcome: Availability*  
*Performance Measure: To be determined by service(s) provided*

### **V. CONTINUUM OF CARE HOMELESS STRATEGY AND CHRONIC HOMELESSNESS TECHNICAL ASSISTANCE**

**A. Homeless Technical Assistance: (CDBG Funds) \$30,000** – Funds allocated to provide technical assistance and build capacity for the homeless strategy; to develop and implement the Ten Year Plan to End Chronic Homelessness.

*Strategic Goal: Promote the development and participation of community-based organizations*  
*Matrix Code: 19C CDBG Non-profit Organization Capacity Building*

<i>Specific Objective(s):</i>	<i>Suitable Living Environment End chronic homelessness Coordinate Super Nofa Applications for CoC</i>
<i>Proposed Outcome:</i>	<i>Availability/Accessibility Four capacity building informational meetings for non-profit staff</i>
<i>Performance Measure:</i>	<i>100% of capacity training meetings held</i>

## VI. HOUSING ACTIVITIES

### A. Rehabilitation Program: (CDBG Funds) \$229,245(HOME Funds) \$91,668

– A program designed to assist low to moderate-income families address health and safety issues, Housing Quality Standards (HQS), energy conservation, handicap accessibility, and water/sewer taps. Funding provided for approximately (25) families.

<i>Strategic Goal:</i>	<i>Promote safe, decent affordable housing</i>
<i>Matrix Code:</i>	<i>14A Rehab; Single-unit Residential 570.202 14F Energy Efficiency Improvements 570.202</i>
<i>Specific Objective(s):</i>	<i>Improve the quality of decent affordable owner housing</i>
<i>Proposed Outcome:</i>	<i>Affordability</i>
<i>Performance Measure:</i>	<i>90% of units inspected will receive rehabilitation assistance; 100% of homeowners will receive literature on lead based paint.</i>

### B. New Construction – Homeownership: (HOME Funds) Not Funded – Construction of affordable housing units. This item is funded for the possibility of obtaining a home to be moved creating a new single family detached affordable unit to be sold. Once the structure is moved it is then classified as New Construction.

<i>Strategic Goal:</i>	<i>Promote safe, decent affordable housing</i>
<i>Matrix Code:</i>	<i>12 Construction of Housing 570.201(m)</i>
<i>Specific Objective(s):</i>	<i>Increase the availability of decent affordable housing</i>
<i>Proposed Outcome:</i>	<i>Affordability</i>
<i>Performance Measure:</i>	<i>100% construction and unit sold as affordable housing</i>

### C. Direct Homeownership Assistance: (HOME Funds) \$268,429

This program provides up to \$5,000 down payment and closing cost assistance to approximately 50 qualified low/mod income homebuyers.

<i>Strategic Goal:</i>	<i>Increase homeownership opportunities</i>
<i>Matrix Code:</i>	<i>13 Direct homeownership assistance 570.201(n)</i>
<i>Specific Objective(s):</i>	<i>Improve access to decent affordable housing</i>
<i>Proposed Outcome:</i>	<i>Affordability</i>
<i>Performance Measure:</i>	<i>95% of homebuyers receive assistance with downpayment and/or closing cost 100% of applicants receive literature on budgeting, credit, lead based paint</i>

### D. Acquisition/Demolition/Clearance: (HOME Funds) Not Funded; (CDBG Funds) Not Funded – Acquisition of property to promote neighborhood revitalization in the Highland East neighborhood strategy area and promote affordable housing development. Demolition and Clearance funds are used to demolish and clear

substandard housing units not feasible for rehabilitation in order to replace with affordable housing units.

*Strategic Goal:* Promote safe, decent affordable housing  
*Matrix Code:* 01 Acquisition of real property 570.201(a)  
*Specific Objective(s):* Increase the availability of affordable owner housing  
*Proposed Outcome:* Removal of substandard/code enforced housing (10 units)  
*Performance Measure:* 90% of properties acquired that have substandard housing will be used for new construction of affordable housing

- E. Tenant-based Rental Assistance (TBRA): (HOME Funds) \$30,000** – A rental subsidy program to help individual households acquire permanent housing. The TBRA Program is part of the strategy to end chronic homelessness by offering assistance for a period not to exceed 24 months and will be administered by Reinvestment in Communities, Inc.

*Strategic Goal:* Promote safe, decent affordable housing  
*Matrix Code;* 05S Rental housing subsidies (HOME) 570.204  
 05T Security Deposit  
*Specific Objective:* Decent Affordable Housing  
*Proposed Outcome:* Affordability  
*Performance Measure:* 100% of persons meeting programs criteria assisted with TBRA

- G. Tenant-based Rental Assistance (TBRA): (HOME Funds) \$5,000** – A rental subsidy program to help individual households acquire permanent housing by providing security and utility deposits.

*Strategic Goal:* Promote safe, decent affordable housing  
*Matrix Code;* 05S Rental housing subsidies (HOME) 570.204  
 05T Security Deposit  
*Specific Objective:* Decent Affordable Housing  
*Proposed Outcome:* Affordability  
*Performance Measure:* 100% of persons meeting programs criteria assisted with TBRA

- H. Property Disposition/Maintenance: (CDBG Funds) \$2,000** – Weed cutting, maintenance and repairs, utilities and gas service for properties owned by Housing & Neighborhoods currently or newly acquired.

*Strategic Goal:* Increase homeownership opportunities  
*Matrix Code:* 02 Disposition 570,201(b)  
*Specific Objective(s):* Decent Affordable Housing  
*Proposed Outcome:* Affordability  
*Performance Measure:* 100% of properties maintained until disposition

- I. HOPE 4 GASTON: (CDBG Funds) \$10,000** – Funds allocated to provide minor home repair to homeowners living in documented Low/Mod Income Areas

*Strategic Goal:* Promote safe, decent affordable housing  
*Matrix Code:* 14A Rehab; Single-unit Residential 570.202  
 14F Energy-Efficiency Improvements  
*Specific Objective(s):* Improve the quality of decent affordable owner housing  
*Proposed Outcome:* Affordability  
*Performance Measure:* 15 homeowners in L/M area assisted with minor repairs

**FEDERAL FUNDING SOURCES**

<b><u>CDBG FUNDS</u></b>	
2013 – 2014 Entitlement	\$ 661,507
Re-program-Prior Yrs.	\$ -0-
Program Income	\$ 4,200
<b>Total</b>	<b>\$ 665,707</b>
<b><u>HOME FUNDS</u></b>	
2013 - 2014 Entitlement	\$ 553,462
Re-program/Prior Yrs.	\$ -0-
Program Income	\$ 20,000
<b>Total</b>	<b>\$ 573,462</b>
<b><u>Total</u></b>	<b>\$1,239,169</b>

**RECONCILIATION OF LINE OF CREDIT (LOC) AND CASH**

**BALANCES TO UNEXPENDED BALANCE OF CDBG FUNDS  
(CASH BASIS)**

**UNEXPENDED CDBG BALANCE 6/30/2014** **\$737,503.42**

**RECONCILIATION:**

<b>LOC BALANCE</b>	<b>\$1,162,894.50</b>
<b>ADD:</b>	
<b>CASH ON HAND:</b>	
<b>Grantee Program Income</b>	<b>\$0.00</b>
<b>Subrecipient Account</b>	<b>\$0.00</b>
<b>Revolving Fund Cash Balance</b>	<b>\$0.00</b>
<b>Section 108 Cash Balance</b>	<b>\$0.00</b>
<b>TOTAL CASH ON HAND</b>	<b>\$0.00</b>

**SUBTRACT:**

<b>Grantee CDBG Program Liabilities</b>	<b>(\$425,391.08)</b>
<b>Subrecipient CDBG Program Liabilities</b>	<b>\$0.00</b>
<b>TOTAL LIABILITIES</b>	<b>(\$425,391.08)</b>

**TOTAL RECONCILING BALANCE** **\$737,503.42**

**ATTACHMENTS FOR CDBG PROGRAM INCOME /  
ADJUSTMENTS AND LOANS & RECEIVABLES**

6/30/2014

**A. Program Income**

1	Total program income to revolving funds	0.00
2	Float-funded activities	0.00
3	Other loan repayments by category:	
	CD Rehab – Homeowner Loans	3,105.15
	CD Rehab – Investor Loan	
4	Income received from sale of property	
	<b>TOTAL Program Income</b>	<b>\$3,105.15</b>

**B. Prior Period Adjustments**

**1. Reimbursement made for disallowed cost:**

- Activity Name
- Activity Number
- Program Year expenditure reported
- Amount returned to program account

**C. Loans and Other Receivables**

1	Float-funded activities outstanding as of end of reporting period	
2	Principle balance owed as of end of reporting period	\$46,748.34
3	Total number of loans outstanding:	7 loans
4	Parcels acquired or improved with CDBG funds that Are available for sale as of the end of reporting period	0
5	Number and amount of loans in default and for which Balance was forgiven or written off during the reporting period	0
6	Lump sum drawdown agreement	0



GASTONIA

Count of CDBG Activities with Disbursements by Activity Group & Matrix Code

Activity Group	Activity Category	Underway Count	Underway Activities Disbursed	Completed Count	Completed Activities Disbursed	Program Year Count	Total Activities Disbursed
Acquisition	Acquisition of Real Property (01)	0	\$0.00	21	\$0.00	21	\$0.00
	Disposition (02)	2	\$1,839.22	0	\$0.00	2	\$1,839.22
Housing	<b>Total Acquisition</b>	<b>2</b>	<b>\$1,839.22</b>	<b>21</b>	<b>\$0.00</b>	<b>23</b>	<b>\$1,839.22</b>
	Rehab; Single-Unit Residential (14A)	9	\$5,407.66	18	\$67,885.00	27	\$73,292.66
	Rehabilitation Administration (14H)	2	\$18,126.88	0	\$0.00	2	\$18,126.88
	Lead-Based/Lead Hazard Test/Abate (14I)	1	\$465.00	0	\$0.00	1	\$465.00
Public Services	<b>Total Housing</b>	<b>12</b>	<b>\$23,999.54</b>	<b>18</b>	<b>\$67,885.00</b>	<b>30</b>	<b>\$91,884.54</b>
	Public Services (General) (05)	1	\$3,958.53	1	\$0.00	2	\$3,958.53
	Fair Housing Activities (if CDGS, then subject to 15% cap) (05J)	2	\$7,218.07	0	\$0.00	2	\$7,218.07
General Administration and Planning	<b>Total Public Services</b>	<b>3</b>	<b>\$11,176.60</b>	<b>1</b>	<b>\$0.00</b>	<b>4</b>	<b>\$11,176.60</b>
	General Program Administration (21A)	2	\$108,514.72	0	\$0.00	2	\$108,514.72
Other	<b>Total General Administration and Planning</b>	<b>2</b>	<b>\$108,514.72</b>	<b>0</b>	<b>\$0.00</b>	<b>2</b>	<b>\$108,514.72</b>
	CDBG Non-profit Organization Capacity Building (19C)	1	\$0.00	1	\$13,161.00	2	\$13,161.00
Repayment of Section 108 Loans	<b>Total Other</b>	<b>1</b>	<b>\$0.00</b>	<b>1</b>	<b>\$13,161.00</b>	<b>2</b>	<b>\$13,161.00</b>
	Planned Repayment of Section 108 Loan Principal (19F)	2	\$198,815.00	0	\$0.00	2	\$198,815.00
	Unplanned Repayment of Section 108 Loan Principal (19G)	1	\$0.00	0	\$0.00	1	\$0.00
Grand Total	<b>Total Repayment of Section 108 Loans</b>	<b>3</b>	<b>\$198,815.00</b>	<b>0</b>	<b>\$0.00</b>	<b>3</b>	<b>\$198,815.00</b>
		<b>23</b>	<b>\$344,345.08</b>	<b>41</b>	<b>\$81,046.00</b>	<b>64</b>	<b>\$425,391.08</b>



GASTONIA

**CDBG Sum of Actual Accomplishments by Activity Group and Accomplishment Type**

Activity Group	Matrix Code	Accomplishment Type	Open Count	Completed Count	Program Year Totals
Acquisition	Acquisition of Real Property (01)	Persons	0	21	21
	Disposition (02)	Housing Units	0	0	0
Housing	<b>Total Acquisition</b>		<b>0</b>	<b>21</b>	<b>21</b>
	Rehab; Single-Unit Residential (14A)	Housing Units	2	18	20
	Rehabilitation Administration (14H)	Housing Units	0	0	0
	Lead-Based/Lead Hazard Test/Abate (14I)	Housing Units	0	0	0
Public Services	<b>Total Housing</b>		<b>2</b>	<b>18</b>	<b>20</b>
	Public Services (General) (05)	Persons	0	64,827	64,827
	Fair Housing Activities (if CDGS, then subject to 15% cap) (05J)	Persons	64,827	0	64,827
Other	<b>Total Public Services</b>		<b>64,827</b>	<b>64,827</b>	<b>129,654</b>
	CDBG Non-profit Organization Capacity Building (19C)	Organizations	0	64,827	64,827
<b>Grand Total</b>	<b>Total Other</b>		<b>0</b>	<b>64,827</b>	<b>64,827</b>
			<b>64,829</b>	<b>129,693</b>	<b>194,522</b>



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**CDBG Beneficiaries by Racial / Ethnic Category**

Housing-Non Housing	Race	Total Persons		Total Hispanic		Total Hispanic Households
		Total Persons	Total Hispanic Persons	Total Households	Total Hispanic Households	
Housing	White	0	0	0	7	0
	Black/African American	0	0	0	13	0
	<b>Total Housing</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>20</b>	<b>0</b>
Grand Total	White	0	0	0	7	0
	Black/African American	0	0	0	13	0
	<b>Total Grand Total</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>20</b>	<b>0</b>



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**CDBG Beneficiaries by Income Category**

Income Levels	Owner Occupied	Renter Occupied	Persons
Housing	5	0	0
Extremely Low (<=30%)	6	0	0
Low (>30% and <=50%)	3	0	0
Mod (>50% and <=80%)	14	0	0
Total Low-Mod	4	0	0
Non Low-Mod (>80%)	18	0	0
Total Beneficiaries			



**PART I: SUMMARY OF CDBG RESOURCES**

01 UNEXPENDED CDBG FUNDS AT END OF PREVIOUS PROGRAM YEAR	493,971.89
02 ENTITLEMENT GRANT	661,507.00
03 SURPLUS URBAN RENEWAL	0.00
04 SECTION 108 GUARANTEED LOAN FUNDS	0.00
05 CURRENT YEAR PROGRAM INCOME	7,415.61
05a CURRENT YEAR SECTION 108 PROGRAM INCOME (FOR SI TYPE)	0.00
06 RETURNS	0.00
07 ADJUSTMENT TO COMPUTE TOTAL AVAILABLE	0.00
08 TOTAL AVAILABLE (SUM, LINES 01-07)	1,162,894.50

**PART II: SUMMARY OF CDBG EXPENDITURES**

09 DISBURSEMENTS OTHER THAN SECTION 108 REPAYMENTS AND PLANNING/ADMINISTRATION	118,061.36
10 ADJUSTMENT TO COMPUTE TOTAL AMOUNT SUBJECT TO LOW/MOD BENEFIT	0.00
11 AMOUNT SUBJECT TO LOW/MOD BENEFIT (LINE 09 + LINE 10)	118,061.36
12 DISBURSED IN IDIS FOR PLANNING/ADMINISTRATION	108,514.72
13 DISBURSED IN IDIS FOR SECTION 108 REPAYMENTS	198,815.00
14 ADJUSTMENT TO COMPUTE TOTAL EXPENDITURES	0.00
15 TOTAL EXPENDITURES (SUM, LINES 11-14)	425,391.08
16 UNEXPENDED BALANCE (LINE 08 - LINE 15)	737,503.42

**PART III: LOWMOD BENEFIT THIS REPORTING PERIOD**

17 EXPENDED FOR LOW/MOD HOUSING IN SPECIAL AREAS	0.00
18 EXPENDED FOR LOW/MOD MULTI-UNIT HOUSING	0.00
19 DISBURSED FOR OTHER LOW/MOD ACTIVITIES	118,061.36
20 ADJUSTMENT TO COMPUTE TOTAL LOW/MOD CREDIT	0.00
21 TOTAL LOW/MOD CREDIT (SUM, LINES 17-20)	118,061.36
22 PERCENT LOW/MOD CREDIT (LINE 21/LINE 11)	100.00%

**LOW/MOD BENEFIT FOR MULTI-YEAR CERTIFICATIONS**

23 PROGRAM YEARS(PY) COVERED IN CERTIFICATION	PY: PY: PY:
24 CUMULATIVE NET EXPENDITURES SUBJECT TO LOW/MOD BENEFIT CALCULATION	0.00
25 CUMULATIVE EXPENDITURES BENEFITING LOW/MOD PERSONS	0.00
26 PERCENT BENEFIT TO LOW/MOD PERSONS (LINE 25/LINE 24)	0.00%

**PART IV: PUBLIC SERVICE (PS) CAP CALCULATIONS**

27 DISBURSED IN IDIS FOR PUBLIC SERVICES	11,176.60
28 PS UNLIQUIDATED OBLIGATIONS AT END OF CURRENT PROGRAM YEAR	0.00
29 PS UNLIQUIDATED OBLIGATIONS AT END OF PREVIOUS PROGRAM YEAR	0.00
30 ADJUSTMENT TO COMPUTE TOTAL PS OBLIGATIONS	0.00
31 TOTAL PS OBLIGATIONS (LINE 27 + LINE 28 - LINE 29 + LINE 30)	11,176.60
32 ENTITLEMENT GRANT	661,507.00
33 PRIOR YEAR PROGRAM INCOME	2,918.01
34 ADJUSTMENT TO COMPUTE TOTAL SUBJECT TO PS CAP	0.00
35 TOTAL SUBJECT TO PS CAP (SUM, LINES 32-34)	664,425.01
36 PERCENT FUNDS OBLIGATED FOR PS ACTIVITIES (LINE 31/LINE 35)	1.68%

**PART V: PLANNING AND ADMINISTRATION (PA) CAP**

37 DISBURSED IN IDIS FOR PLANNING/ADMINISTRATION	108,514.72
38 PA UNLIQUIDATED OBLIGATIONS AT END OF CURRENT PROGRAM YEAR	0.00
39 PA UNLIQUIDATED OBLIGATIONS AT END OF PREVIOUS PROGRAM YEAR	0.00
40 ADJUSTMENT TO COMPUTE TOTAL PA OBLIGATIONS	0.00
41 TOTAL PA OBLIGATIONS (LINE 37 + LINE 38 - LINE 39 +LINE 40)	108,514.72
42 ENTITLEMENT GRANT	661,507.00
43 CURRENT YEAR PROGRAM INCOME	7,415.61
44 ADJUSTMENT TO COMPUTE TOTAL SUBJECT TO PA CAP	0.00
45 TOTAL SUBJECT TO PA CAP (SUM, LINES 42-44)	668,922.61
46 PERCENT FUNDS OBLIGATED FOR PA ACTIVITIES (LINE 41/LINE 45)	16.22%



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**LINE 17 DETAIL: ACTIVITIES TO CONSIDER IN DETERMINING THE AMOUNT TO ENTER ON LINE 17**

Report returned no data.

**LINE 18 DETAIL: ACTIVITIES TO CONSIDER IN DETERMINING THE AMOUNT TO ENTER ON LINE 18**

Report returned no data.

**LINE 19 DETAIL: ACTIVITIES INCLUDED IN THE COMPUTATION OF LINE 19**

Plan Year	IDIS Project	IDIS Activity	Voucher Number	Activity Name	Matrix Code	National Objective	Drawn Amount
2012	2	1919	5660008	PROJECT DELIVERY	14H	LMA	\$1,620.19
2012	6	1920	5660008	FAIRHOUSING	05J	LMA	\$761.18
2012	8	1926	5672583	COC RIC	19C	LMA	\$13,161.00
2012	9	1968	5688096	LBP/ASBESTOS TESTING	14I	LMH	\$465.00
2012	9	2011	5660077	HS Linden Cr	14A	LMH	\$3,325.00
2012	9	2013	5660063	H&S Morris St	14A	LMH	\$2,975.00
2012	13	1921	5660008	PROPERTY DISPOSITION	02	LMH	\$254.14
2013	2	2030	5680321	2013 PROJECT DELIVERY	14H	LMH	\$3,061.33
2013	2	2030	5687635	2013 PROJECT DELIVERY	14H	LMH	\$4,324.11
2013	2	2030	5687952	2013 PROJECT DELIVERY	14H	LMH	\$4,487.44
2013	2	2030	5702182	2013 PROJECT DELIVERY	14H	LMH	\$2,700.94
2013	2	2030	5724617	2013 PROJECT DELIVERY	14H	LMH	\$1,932.87
2013	3	2018	5680321	2013 FAIRHOUSING	05J	LMA	\$1,078.66
2013	3	2018	5687635	2013 FAIRHOUSING	05J	LMA	\$1,329.09
2013	3	2018	5687952	2013 FAIRHOUSING	05J	LMA	\$2,040.08
2013	3	2018	5702182	2013 FAIRHOUSING	05J	LMA	\$1,238.89
2013	3	2018	5724617	2013 FAIRHOUSING	05J	LMA	\$770.17
2013	4	2019	5680321	2013 PROPERTY DISPOSITION	02	LMH	\$248.65
2013	4	2019	5687635	2013 PROPERTY DISPOSITION	02	LMH	\$285.10
2013	4	2019	5687952	2013 PROPERTY DISPOSITION	02	LMH	\$569.65
2013	4	2019	5702182	2013 PROPERTY DISPOSITION	02	LMH	\$248.56
2013	4	2019	5724617	2013 PROPERTY DISPOSITION	02	LMH	\$233.12
2013	5	2021	5720444	2013 NON PROFIT COC	05	LMC	\$3,958.53
2013	14	2028	5660258	H&S - RANSOM STREET	14A	LMH	\$4,400.00
2013	14	2032	5660258	H&S Crawford Avenue	14A	LMH	\$1,610.00
2013	14	2033	5660258	H&S Eastwynn Circle	14A	LMH	\$3,950.00
2013	14	2041	5660258	H&S Mountainbrook Drive	14A	LMH	\$3,525.00
2013	14	2044	5660258	H&S N Weldon Street	14A	LMH	\$3,850.00
2013	14	2045	5660258	H&S Northwynn Road	14A	LMH	\$3,075.00
2013	14	2050	5660258	H&S Hilltop Circle	14A	LMH	\$3,250.00
2013	14	2050	5661261	H&S Hilltop Circle	14A	LMH	\$1,500.00
2013	14	2052	5660258	H&S Hartford Drive	14A	LMH	\$2,865.00
2013	14	2053	5660258	H&S Smyre Drive	14A	LMH	\$5,000.00
2013	14	2062	5660258	H&S Salem Drive	14A	LMH	\$2,865.00
2013	14	2070	5682662	H&S Spencer Ave	14A	LMH	\$4,990.00
2013	14	2074	5682662	H&S E 12th Ave	14A	LMH	\$4,025.00
2013	14	2076	5700360	H&S Spencer Ave	14A	LMH	\$4,736.00
2013	14	2077	5700360	H&S Bond Ave	14A	LMH	\$2,535.00
2013	14	2078	5682662	H&S Hooper Ave	14A	LMH	\$4,784.00
2013	14	2088	5700360	H&S Crawford Ave	14A	LMH	\$4,625.00
2013	14	2102	5720444	H&S Mountainbrook Drive	14A	LMH	\$3,467.56
2013	14	2119	5720444	H&S, 618 Dundeen Drive	14A	LMH	\$418.13
2013	15	2093	5720444	Hope 4 Gaston	14A	LMH	\$1,521.97
<b>Total</b>							<b>\$118,061.36</b>

**LINE 27 DETAIL: ACTIVITIES INCLUDED IN THE COMPUTATION OF LINE 27**



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Plan Year	IDIS Project	IDIS Activity	Voucher Number	Activity Name	Matrix Code	National Objective	Drawn Amount
2012	6	1920	5660008	FAIRHOUSING	05J	LMA	\$761.18
2013	3	2018	5680321	2013 FAIRHOUSING	05J	LMA	\$1,078.66
2013	3	2018	5687635	2013 FAIRHOUSING	05J	LMA	\$1,329.09
2013	3	2018	5687952	2013 FAIRHOUSING	05J	LMA	\$2,040.08
2013	3	2018	5702182	2013 FAIRHOUSING	05J	LMA	\$1,238.89
2013	3	2018	5724617	2013 FAIRHOUSING	05J	LMA	\$770.17
2013	5	2021	5720444	2013 NON PROFIT COC	05	LMC	\$3,958.53
<b>Total</b>							<b>\$11,176.60</b>

**LINE 37 DETAIL: ACTIVITIES INCLUDED IN THE COMPUTATION OF LINE 37**

Plan Year	IDIS Project	IDIS Activity	Voucher Number	Activity Name	Matrix Code	National Objective	Drawn Amount
2012	1	1917	5660008	GENERAL ADMIN 2012	21A		\$24,921.81
2013	1	2029	5680321	2013 GENERAL ADMINISTRATION	21A		\$16,256.84
2013	1	2029	5687635	2013 GENERAL ADMINISTRATION	21A		\$19,040.61
2013	1	2029	5687952	2013 GENERAL ADMINISTRATION	21A		\$23,213.38
2013	1	2029	5702182	2013 GENERAL ADMINISTRATION	21A		\$13,562.94
2013	1	2029	5724617	2013 GENERAL ADMINISTRATION	21A		\$11,519.14
<b>Total</b>							<b>\$108,514.72</b>

# Annual Performance Report HOME Program

U.S. Department of Housing  
and Urban Development  
Office of Community Planning  
and Development

OMB Approval No. 2506-0171  
(exp. 8/31/2009)

Public reporting burden for this collection of information is estimated to average 2.5 hours per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. This agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless that collection displays a valid OMB control number.

The HOME statute imposes a significant number of data collection and reporting requirements. This includes information on assisted properties, on the owners or tenants of the properties, and on other programmatic areas. The information will be used: 1) to assist HOME participants in managing their programs; 2) to track performance of participants in meeting fund commitment and expenditure deadlines; 3) to permit HUD to determine whether each participant meets the HOME statutory income targeting and affordability requirements; and 4) to permit HUD to determine compliance with other statutory and regulatory program requirements. This data collection is authorized under Title II of the Cranston-González National Affordable Housing Act or related authorities. Access to Federal grant funds is contingent on the reporting of certain project-specific data elements. Records of information collected will be maintained by the recipients of the assistance. Information on activities and expenditures of grant funds is public information and is generally available for disclosure. Recipients are responsible for ensuring confidentiality when public disclosure is not required.

This form is intended to collect numeric data to be aggregated nationally as a complement to data collected through the Cash and Management Information (C/MI) System. Participants should enter the reporting period in the first block. The reporting period is October 1 to September 30. Instructions are included for each section if further explanation is needed.

Submit this form on or before December 31.	This report is for period (mm/dd/yyyy)		Date Submitted (mm/dd/yyyy)
Send one copy to the appropriate HUD Field Office and one copy to: HOME Program, Rm 7176, 451 7th Street, S.W., Washington D.C. 20410	Starting 07/01/2013	Ending 06/30/2014	09/23/2014

### Part I Participant Identification

1. Participant Number MC-13-DC-370202	2. Participant Name GASTONIA - GASTON CONSORTIUM		
3. Name of Person completing this report MYRA T. NICHOLS		4. Phone Number (Include Area Code) 704-866-6756	
5. Address PO BOX 1748 (150 SOUTH YORK STREET)	6. City GASTONIA	7. State NC	8. Zip Code 28053

### Part II Program Income

Enter the following program income amounts for the reporting period: in block 1, enter the balance on hand at the beginning; in block 2, enter the amount generated; in block 3, enter the amount expended; and in block 4, enter the amount for Tenant-Based rental Assistance.

1. Balance on hand at Beginning of Reporting Period	2. Amount received during Reporting Period	3. Total amount expended during Reporting Period	4. Amount expended for Tenant-Based Rental Assistance	5. Balance on hand at end of Reporting Period (1 + 2 - 3) = 5
0	28,850.90	28,850.90	27,804.00	0

### Part III Minority Business Enterprises (MBE) and Women Business Enterprises (WBE)

In the table below, indicate the number and dollar value of contracts for HOME projects completed during the reporting period.

	a. Total	Minority Business Enterprises (MBE)			f. White Non-Hispanic
		b. Alaskan Native or American Indian	c. Asian or Pacific Islander	d. Black Non-Hispanic	
A. Contracts					
1. Number					
2. Dollar Amount					
B. Sub-Contracts					
1. Number					
2. Dollar Amount					
	a. Total	b. Women Business Enterprises (WBE)	c. Male		
C. Contracts					
1. Number					
2. Dollar Amount					
D. Sub-Contracts					
1. Number					
2. Dollar Amounts					

**Part IV Minority Owners of Rental Property**

In the table below, indicate the number of HOME assisted rental property owners and the total dollar amount of HOME funds in these rental properties assisted during the reporting period.

	a. Total	Minority Property Owners			f. White Non-Hispanic
		b. Alaskan Native or American Indian	c. Asian or Pacific Islander	d. Black Non-Hispanic	
1. Number	6				6
2. Dollar Amount	35,782				

**Part V Relocation and Real Property Acquisition**

Indicate the number of persons displaced, the cost of relocation payments, the number of parcels acquired, and the cost of acquisition. The data provided should reflect only displacements and acquisitions occurring during the reporting period.

	a. Number	b. Cost	Minority Business Enterprises (MBE)			f. White Non-Hispanic
			b. Alaskan Native or American Indian	c. Asian or Pacific Islander	d. Black Non-Hispanic	e. Hispanic
1. Parcels Acquired						
2. Businesses Displaced						
3. Nonprofit Organizations Displaced						
4. Households Temporarily Relocated, not Displaced						
Households Displaced	a. Total					
5. Households Displaced - Number						
6. Households Displaced - Cost						



GASTONIA CONSORTIUM

Home Disbursements and Unit Completions

Activity Type	Disbursed Amount	Units Completed	Units Occupied
Rentals	\$364,224.87	4	4
TBRA Families	\$27,804.00	13	13
First Time Homebuyers	\$269,905.53	55	55
Total, Rentals and TBRA	\$392,028.87	17	17
Total, Homebuyers and Homeowners	\$269,905.53	55	55
<b>Grand Total</b>	<b>\$661,934.40</b>	<b>72</b>	<b>72</b>

Home Unit Completions by Percent of Area Median Income

Activity Type	Home Unit Completions by Percent of Area Median Income				Units Completed	
	0% - 30%	31% - 50%	51% - 60%	61% - 80%	Total 0% - 60%	Total 0% - 80%
Rentals	4	0	0	0	4	4
TBRA Families	13	0	0	0	13	13
First Time Homebuyers	1	10	6	38	17	55
Total, Rentals and TBRA	17	0	0	0	17	17
Total, Homebuyers and Homeowners	1	10	6	38	17	55
<b>Grand Total</b>	<b>18</b>	<b>10</b>	<b>6</b>	<b>38</b>	<b>34</b>	<b>72</b>

Home Unit Reported As Vacant

Activity Type	Reported as Vacant
Rentals	0
TBRA Families	0
First Time Homebuyers	0
Total, Rentals and TBRA	0
Total, Homebuyers and Homeowners	0
<b>Grand Total</b>	<b>0</b>



GASTONIA CONSORTIUM

Home Unit Completions by Racial / Ethnic Category

	Rentals		TBRA Families		First Time Homebuyers	
	Units Completed - Hispanics	Units Completed	Units Completed - Hispanics	Units Completed	Units Completed - Hispanics	Units Completed
White	1	0	7	0	39	0
Black/African American	3	0	5	0	12	0
Asian & White	0	0	1	0	0	0
Other multi-racial	0	0	0	0	4	4
<b>Total</b>	<b>4</b>	<b>0</b>	<b>13</b>	<b>0</b>	<b>55</b>	<b>4</b>

Total, Rentals and TBRA Homebuyers and Homeowners

	Total, Rentals and TBRA		Total, Homebuyers and Homeowners		Grand Total	
	Units Completed - Hispanics	Units Completed	Units Completed - Hispanics	Units Completed	Units Completed - Hispanics	Units Completed
White	8	0	39	0	47	0
Black/African American	8	0	12	0	20	0
Asian & White	1	0	0	0	1	0
Other multi-racial	0	0	4	4	4	4
<b>Total</b>	<b>17</b>	<b>0</b>	<b>55</b>	<b>4</b>	<b>72</b>	<b>4</b>

# HOME Match Report

U.S. Department of Housing and Urban Development  
Office of Community Planning and Development

OMB Approval No. 2506-0171  
(exp. 12/31/2012)

<b>Part I Participant Identification</b>		Match Contributions for <b>Federal Fiscal Year (yyyy)</b> 2013	
1. Participant No. (assigned by HUD) MC-04-DC-370202	2. Name of the Participating Jurisdiction Gastonia Consortium	3. Name of Contact (person completing this report) Myra Nichols	
5. Street Address of the Participating Jurisdiction 150 S. York Street	7. State NC	4. Contact's Phone Number (include area code) 704-865-6756	
6. City Gastonia	8. Zip Code 28052		

## Part II Fiscal Year Summary

1. Excess match from prior Federal fiscal year	\$	4,320,882.65						
2. Match contributed during current Federal fiscal year (see Part III.9.)	\$	88,946.00						
3. Total match available for current Federal fiscal year (line 1 + line 2)	\$							4,409,828.65
4. Match liability for current Federal fiscal year	\$							56,217.04
5. Excess match carried over to next Federal fiscal year (line 3 minus line 4)	\$							4,353,611.61

## Part III Match Contribution for the Federal Fiscal Year

1. Project No. or Other ID	2. Date of Contribution (mm/dd/yyyy)	3. Cash (non-Federal sources)	4. Foregone Taxes, Fees, Charges	5. Appraised Land / Real Property	6. Required Infrastructure	7. Site Preparation, Construction Materials, Donated labor	8. Bond Financing	9. Total Match
HG2030	08/02/2013		\$48,015.00					
HG2003	08/23/2013		\$151.24					
HG2055	11/08/2013		\$25.25					
HG2046	12/11/2013		\$214.50					
HG2064	12/20/2013		\$75.00					
HG2069	01/13/2014		\$932.78					
HG2067	01/17/2014		\$75.00					
HG2081	02/14/2014		\$72.00					
HG2079	03/10/2014		\$72.00					
HG2109	06/13/2014		\$35,503.88					
HG2115	06/17/2014		\$1,531.03					



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Fiscal Year	Match Percent	Total Disbursements	Disbursements Requiring Match	Match Liability Amount
1998	25.0%	\$255,960.64	\$141,260.64	\$35,315.16
1999	25.0%	\$700,471.50	\$633,928.18	\$158,482.04
2000	25.0%	\$374,697.83	\$297,147.83	\$74,286.95
2001	25.0%	\$578,044.49	\$495,337.81	\$123,834.45
2002	25.0%	\$146,484.40	\$85,861.63	\$21,465.40
2003	25.0%	\$549,799.34	\$469,293.60	\$117,323.40
2004	25.0%	\$239,110.55	\$157,060.53	\$39,265.13
2005	25.0%	\$891,303.16	\$695,638.46	\$173,909.61
2006	25.0%	\$1,144,003.22	\$1,027,129.58	\$256,782.39
2007	25.0%	\$1,246,904.63	\$1,120,454.53	\$280,113.63
2008	25.0%	\$1,351,165.99	\$1,189,067.40	\$297,266.85
2009	25.0%	\$186,518.87	\$148,429.50	\$37,107.37
2010	25.0%	\$928,803.41	\$830,736.84	\$207,684.21
2011	25.0%	\$660,196.99	\$406,137.64	\$101,534.41
2012	25.0%	\$326,665.99	\$204,512.19	\$51,128.04
2013	25.0%	\$285,648.81	\$224,868.17	\$56,217.04

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REPORT FOR CPD PROGRAM CDBG, HOME  
 PGM YR 2013

Plan Year	IDIS Project	Project	IDIS Activity ID	Activity Name	Activity Status	Program	Funded Amount	Draw Amount	Balance
2013	1	(2013) CDBG GENERAL ADMINISTRATION	2029	2013 GENERAL ADMINISTRATION	Open	CDBG	\$132,301.00	\$83,592.91	\$48,708.09
		Project Total					\$132,301.00	\$83,592.91	\$48,708.09
	2	(2013) CDBG PROJECT DELIVERY	2030	2013 PROJECT DELIVERY	Open	CDBG	\$27,569.00	\$16,506.69	\$11,062.31
		Project Total					\$27,569.00	\$16,506.69	\$11,062.31
	3	(2013) CDBG FAIR HOUSING	2018	2013 FAIRHOUSING	Open	CDBG	\$7,992.00	\$6,456.89	\$1,535.11
		Project Total					\$7,992.00	\$6,456.89	\$1,535.11
	4	(2013) CDBG PROPERTY DISPOSITION	2019	2013 PROPERTY DISPOSITION	Open	CDBG	\$2,000.00	\$1,585.08	\$414.92
		Project Total					\$2,000.00	\$1,585.08	\$414.92
	5	(2013) CDBG SUBRECIPIENT/NONPROFIT COC	2021	2013 NON PROFIT COC	Open	CDBG	\$5,000.00	\$3,958.53	\$1,041.47
		Project Total					\$5,000.00	\$3,958.53	\$1,041.47
	6	(2013) CDBG COC TECH ASST.- (RIC)	2023	2013 CONTINUUM OF CARE (RIC)	Open	CDBG	\$30,000.00	\$16,249.15	\$13,750.85
		Project Total					\$30,000.00	\$16,249.15	\$13,750.85
	7	(2013) SECTION 108 LOAN	2026	2013 108 LOAN	Open	CDBG	\$217,400.00	\$173,859.05	\$43,540.95
		Project Total					\$217,400.00	\$173,859.05	\$43,540.95
	8	(2013) HOME General Administration	2022	2013 HOME ADMINISTRATION	Open	HOME	\$55,346.00	\$31,389.28	\$23,956.72
		Project Total					\$55,346.00	\$31,389.28	\$23,956.72
	9	(2013) HOME CHDO Capacity Bldg./Operating Expense (RIC)	2020	2013 CHDO OPERATING (RIC)	Open	HOME	\$20,000.00	\$17,835.20	\$2,164.80
		Project Total					\$20,000.00	\$17,835.20	\$2,164.80
	10	(2013) HOME CHDO Set-Aside	2068	HOME CHDO Set-Aside, 909 E 2nd Ave	Open	HOME	\$135,674.00	\$69,060.47	\$66,613.53
		Project Total					\$135,674.00	\$69,060.47	\$66,613.53
	11	(2013) HOME Security Deposit(RIC) 2013-14	2025	2013 SECURITY DEPOSIT (RIC)	Open	HOME	\$0.00	\$0.00	\$0.00
		Project Total					\$0.00	\$0.00	\$0.00
	12	(2013) HOME TBRA (RIC) 2013-14	2024	2013 TBRA (RIC)	Open	HOME	\$0.00	\$0.00	\$0.00
		Project Total					\$0.00	\$0.00	\$0.00
	13	(2013) HOME Direct Homeownership Asst.	2016	DPA Turner Drive	Completed	HOME	\$5,800.00	\$5,800.00	\$0.00
			2017	DPA Country Meadows Drive	Completed	HOME	\$5,800.00	\$5,800.00	\$0.00
			2027	2013 DPA SOFT - INTERNAL USE ONLY	Open	HOME	\$0.00	\$0.00	\$0.00
			2031	DPA Ferncliff Rd	Completed	HOME	\$5,800.00	\$5,800.00	\$0.00
			2034	DPA Blue Topaz Drive	Completed	HOME	\$5,800.00	\$5,800.00	\$0.00
			2035	DPA Parkdale Avenue	Completed	HOME	\$5,800.00	\$5,800.00	\$0.00
			2036	DPA W. 4th Avenue	Completed	HOME	\$5,080.70	\$5,080.70	\$0.00
			2037	DPA St Michaels Lane	Completed	HOME	\$3,238.63	\$3,238.63	\$0.00
			2038	DPA Efirid Street	Completed	HOME	\$5,800.00	\$5,800.00	\$0.00
					Completed	HOME	\$5,597.76	\$5,597.76	\$0.00

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Plan Year	IDIS Project	Project	IDIS Activity ID	Activity Name	Activity Status	Program	Funded Amount	Draw Amount	Balance
2013	13	(2013) HOME Direct Homeownership Asst.	2039	DPA Pikes Peak Drive	Completed	HOME	\$5,800.00	\$5,800.00	\$0.00
			2040	DPA Caldon Drive	Completed	HOME	\$5,800.00	\$5,800.00	\$0.00
			2042	DPA Smith Road	Completed	HOME	\$5,800.00	\$5,800.00	\$0.00
			2043	DPA Ashton Circle	Completed	HOME	\$5,355.28	\$5,355.28	\$0.00
			2046	DPA N Eleventh Street	Completed	HOME	\$2,975.00	\$2,975.00	\$0.00
			2047	DPA Pleasant Street	Completed	HOME	\$5,800.00	\$5,800.00	\$0.00
			2048	DPA Table Rock Drive	Completed	HOME	\$5,025.00	\$5,025.00	\$0.00
			2049	DPA Alvaro Lane	Completed	HOME	\$5,800.00	\$5,800.00	\$0.00
			2051	DPA Park Place Drive	Completed	HOME	\$4,551.80	\$4,551.80	\$0.00
			2054	DPA 1005 Tanglewood Drive	Completed	HOME	\$5,800.00	\$5,800.00	\$0.00
			2055	DPA Bethany Road	Completed	HOME	\$5,049.66	\$5,049.66	\$0.00
			2056	DPA Stroupe Road Unit F	Completed	HOME	\$5,458.71	\$5,458.71	\$0.00
			2057	DPA Oak Hollow Road	Completed	HOME	\$4,537.42	\$4,537.42	\$0.00
			2058	DPA Woodstream Drive	Completed	HOME	\$5,255.47	\$5,255.47	\$0.00
			2059	DPA Crescent Hill Road	Completed	HOME	\$5,800.00	\$5,800.00	\$0.00
			2060	DPA Huntsmoor Drive	Completed	HOME	\$5,800.00	\$5,800.00	\$0.00
			2061	DPA Summers Place	Completed	HOME	\$5,557.61	\$5,557.61	\$0.00
			2063	DPA Laurel Woods Drive	Completed	HOME	\$5,745.01	\$5,745.01	\$0.00
			2064	DPA Loch Stone Drive	Completed	HOME	\$5,371.53	\$5,371.53	\$0.00
			2065	DPA Burlington Ave	Completed	HOME	\$3,640.52	\$3,640.52	\$0.00
			2066	DPA Betty Jean Drive	Completed	HOME	\$3,465.77	\$3,465.77	\$0.00
			2067	DPA Mountainbrook Drive	Completed	HOME	\$5,800.00	\$5,800.00	\$0.00
			2069	DPA Woodlawn Ave	Completed	HOME	\$5,603.06	\$5,603.06	\$0.00
			2071	DPA Olde Oak Lane	Open	HOME	\$0.00	\$0.00	\$5,000.00
			2072	DPA Skyland Drive	Completed	HOME	\$5,480.48	\$5,480.48	\$0.00
			2073	DPA Nixon Road Unit #19	Open	HOME	\$0.00	\$0.00	\$5,000.00
			2075	DPA Blake Drive	Completed	HOME	\$5,300.00	\$5,300.00	\$0.00
			2079	DPA Rocky Creek Lane	Completed	HOME	\$2,689.36	\$2,689.36	\$0.00
			2081	DPA Kingstree Circle	Completed	HOME	\$5,800.00	\$5,800.00	\$0.00
			2082	DPA Oakland Ave	Completed	HOME	\$3,509.87	\$3,509.87	\$0.00
			2083	DPA Limerick Drive	Open	HOME	\$0.00	\$0.00	\$5,000.00
			2084	DPA Ronda Drive	Completed	HOME	\$3,193.83	\$3,193.83	\$0.00
			2085	DPA Hemlock Avenue	Completed	HOME	\$5,200.00	\$5,200.00	\$0.00
			2086	DPA Larkspur Lane	Completed	HOME	\$4,552.78	\$4,552.78	\$0.00
			2087	DPA Robins Nest Ct.	Completed	HOME	\$3,175.67	\$3,175.67	\$0.00
			2089	DPA Belmar Drive	Completed	HOME	\$4,017.26	\$4,017.26	\$0.00
			2090	DPA White Lane	Completed	HOME	\$5,191.78	\$5,191.78	\$0.00
			2091	DPA Caswell Ave	Open	HOME	\$0.00	\$0.00	\$5,000.00
			2092	DPA Floyd Lane	Completed	HOME	\$3,718.94	\$3,718.94	\$0.00

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Plan Year	IDIS Project	Project	IDIS Activity ID	Activity Name	Activity Status	Program	Funded Amount	Draw Amount	Balance
2013	13	(2013) HOME Direct Homeownership Asst.	2094	DPA Alvaro Lane	Completed	HOME	\$3,728.77	\$3,728.77	\$0.00
			2095	DPA Newport Landing Way	Open	HOME	\$5,000.00	\$0.00	\$5,000.00
			2096	DPA Sunnyside Shady Rest Rd	Open	HOME	\$5,000.00	\$3,958.72	\$1,041.28
			2097	DPA Pikes Peak Drive	Completed	HOME	\$4,475.00	\$4,475.00	\$0.00
			2101	DPA Sherman Street	Completed	HOME	\$5,654.66	\$5,654.66	\$0.00
			2103	DPA College Blvd	Completed	HOME	\$5,487.27	\$5,487.27	\$0.00
			2105	DPA 3893 Graywood Drive	Completed	HOME	\$3,809.16	\$3,809.16	\$0.00
			2106	DPA Brooklyn Avenue	Open	HOME	\$5,000.00	\$3,055.86	\$1,944.14
			2107	DPA S Belvedere Avenue	Completed	HOME	\$5,640.62	\$5,640.62	\$0.00
			2108	DPA Seelje Court	Completed	HOME	\$5,474.80	\$5,474.80	\$0.00
			2109	DPA Argus Drive	Completed	HOME	\$5,000.00	\$5,000.00	\$0.00
			2110	DPA Crowders Creek Road	Open	HOME	\$5,000.00	\$3,264.49	\$1,735.51
			2111	DPA Courtney Cove Court	Open	HOME	\$5,000.00	\$4,085.26	\$914.74
2112	DPA Sherman Street	Open	HOME	\$5,000.00	\$4,905.28	\$94.72			
2113	DPA Burns Mitchell Drive	Open	HOME	\$5,000.00	\$5,000.00	\$0.00			
2115	DPA Union Road	Open	HOME	\$5,000.00	\$5,000.00	\$0.00			
2116	DPA Kiser Road	Open	HOME	\$5,000.00	\$5,000.00	\$0.00			
2117	DPA Park Place Drive	Open	HOME	\$5,000.00	\$4,510.00	\$490.00			
2118	DPA Stone Mountain Drive	Open	HOME	\$5,000.00	\$3,325.23	\$1,674.77			
2120	DPA S. Main St.	Open	HOME	\$5,000.00	\$0.00	\$5,000.00			
2123	HOME GRS, inc. - 909 East Second Ave.	Open	HOME	\$5,000.00	\$0.00	\$5,000.00			
<b>Project Total</b>							\$100,000.00	\$0.00	\$100,000.00
							\$433,809.18	\$290,914.02	\$142,895.16
2014	14	(2013) CDBG HOUSING REHABILITATION	2028	H&S - RANSOM STREET	Completed	CDBG	\$4,400.00	\$4,400.00	\$0.00
			2032	H&S Crawford Avenue	Completed	CDBG	\$1,610.00	\$1,610.00	\$0.00
			2033	H&S Eastwynn Circle	Completed	CDBG	\$3,950.00	\$3,950.00	\$0.00
			2041	H&S Mountainbrook Drive	Completed	CDBG	\$3,525.00	\$3,525.00	\$0.00
			2044	H&S N Weldon Street	Completed	CDBG	\$3,850.00	\$3,850.00	\$0.00
			2045	H&S Northwynn Road	Completed	CDBG	\$3,075.00	\$3,075.00	\$0.00
			2050	H&S Hilltop Circle	Completed	CDBG	\$4,750.00	\$4,750.00	\$0.00
			2052	H&S Hartford Drive	Completed	CDBG	\$2,865.00	\$2,865.00	\$0.00
			2053	H&S Smyre Drive	Completed	CDBG	\$5,000.00	\$5,000.00	\$0.00
			2062	H&S Salem Drive	Completed	CDBG	\$2,865.00	\$2,865.00	\$0.00
			2070	H&S Spencer Ave	Completed	CDBG	\$4,990.00	\$4,990.00	\$0.00
			2074	H&S E 12th Ave	Completed	CDBG	\$4,025.00	\$4,025.00	\$0.00
			2076	H&S Spencer Ave	Completed	CDBG	\$4,736.00	\$4,736.00	\$0.00
			2077	H&S Bond Ave	Completed	CDBG	\$2,535.00	\$2,535.00	\$0.00
			2078	H&S Hooper Ave	Completed	CDBG	\$4,784.00	\$4,784.00	\$0.00
2080	H&S Hillgate Ave	Open	CDBG	\$4,986.00	\$4,817.25	\$168.75			
2088	H&S Crawford Ave	Completed	CDBG	\$4,625.00	\$4,625.00	\$0.00			

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2013	14	(2013) CDBG HOUSING REHABILITATION	2098	H&S Salem Drive	Open	CDBG	\$4,957.00	\$4,679.00	\$278.00
			2099	H&S Nat Barber Ave	Open	CDBG	\$5,000.00	\$0.00	\$5,000.00
			2100	H&S Martin Ave	Open	CDBG	\$4,900.00	\$4,775.80	\$124.40
			2102	H&S Mountainbrook Drive	Open	CDBG	\$3,467.56	\$3,467.56	\$0.00
			2104	H&S Pinehurst Street	Open	CDBG	\$3,900.00	\$0.00	\$3,900.00
			2114	H&S Doffin Lane	Open	CDBG	\$3,150.00	\$0.00	\$3,150.00
			2119	H&S, 618 Dundeen Drive	Open	CDBG	\$418.13	\$418.13	\$0.00
			2121	H&S, 418 S. Willow St.	Open	CDBG	\$2,975.00	\$0.00	\$2,975.00
			2122	H&S, Meadow Lark lane	Open	CDBG	\$1,950.00	\$0.00	\$1,950.00
		Project Total					\$97,288.69	\$79,742.54	\$17,546.15
	15	(2013) Hope 4 Gaston 2014	2093	Hope 4 Gaston	Open	CDBG	\$10,000.00	\$1,521.97	\$8,478.03
		Project Total					\$10,000.00	\$1,521.97	\$8,478.03
		Program Total					\$529,550.69	\$383,472.81	\$146,077.88
		2013 Total					\$644,829.18	\$409,198.97	\$235,630.21
		Program Grand Total					\$1,174,379.87	\$792,671.78	\$381,708.09
		Grand Total					\$529,550.69	\$383,472.81	\$146,077.88
							\$644,829.18	\$409,198.97	\$235,630.21
							\$1,174,379.87	\$792,671.78	\$381,708.09

OFFICE OF COMMUNITY PLANNING AND DEVELOPMENT

PR06 - Summary of Consolidated Plan Projects for Report Year

Plan IDIS Year Project	Project Title and Description	Program	Project Estimate	Amount Drawn Thru Report Year	Amount Available to Draw	Amount Drawn in Report Year
2013 1	(2013) CDBG GENERAL ADMINISTRATION	CDBG	\$132,301.00	\$83,592.91	\$48,708.09	\$83,592.91
	Funding allocated for salaries, fringe benefits and general expenses to carry out administration activities of the Housing & Neighborhoods Division Community Development Programs. This project is 20% of the CDBG Entitlement Funds.					
2	(2013) CDBG PROJECT DELIVERY	CDBG	\$27,569.00	\$16,506.69	\$11,062.31	\$16,506.69
	Funds allocated for salaries, fringe benefits, and general expenses to carryout activities of rehabilitation/new construction for affordable housing programs.					
3	(2013) CDBG FAIR HOUSING	CDBG	\$7,992.00	\$6,456.89	\$1,535.11	\$6,456.89
	Funds allocated for general expenses to carryout fair housing activities.					
4	(2013) CDBG PROPERTY DISPOSITION	CDBG	\$2,000.00	\$1,585.08	\$414.92	\$1,585.08
	Funds for weed cutting, maintenance and repairs, utilities for properties owned by the Housing and Neighborhoods Division for current and newly acquired properties.					
5	(2013) CDBG SUBRECIPIENT/NONPROFIT COC	CDBG	\$5,000.00	\$3,958.53	\$1,041.47	\$3,958.53
	Funds to assist Continuum of Care service providers and other service providers serving low- to moderate-income clientele with supplies and equipment needed for operation and to support the conduct of business.					
6	(2013) CDBG COC TECH ASST.- (RIC)	CDBG	\$30,000.00	\$0.00	\$30,000.00	\$0.00
	Provide technical assistance build capacity for the homeless strategy; also to develop and implement the 10-Year Plan to End Chronic Homelessness.					
7	(2013) SECTION 108 LOAN	CDBG	\$217,400.00	\$173,859.05	\$43,540.95	\$173,859.05
8	(2013) HOME General Administration	HOME	\$55,346.00	\$27,780.24	\$27,565.76	\$27,780.24
	Funds allocated for salaries, fringe benefits, and general expenses for administration of the Housing & Neighborhoods Division Community Development programs. 15% of HOME funds as allowed.					
9	(2013) HOME CHDO Capacity Bldg./Operating Expense (RIC)	HOME	\$20,000.00	\$0.00	\$20,000.00	\$0.00
	Funds available to the certified CHDO's for capacity building activities and operating expenses for use with set-aside funding. (Funding available up to a maximum of 5% of the Home allocation.)					
10	(2013) HOME CHDO Set-Aside	HOME	\$83,019.00	\$0.00	\$0.00	\$0.00
	Funds reserved for certified CHDO to develop affordable housing for low- to moderate-income individuals and families.					
11	(2013) HOME Security Deposit(RIC) 2013-14	HOME	\$5,000.00	\$0.00	\$0.00	\$0.00
	Rental subsidy program designed to help individuals and families with security and utility deposits needed to acquire permanent housing.					

OFFICE OF COMMUNITY PLANNING AND DEVELOPMENT

PR06 - Summary of Consolidated Plan Projects for Report

Year

Plan IDIS Year Project	Project Title and Description	Program	Project Estimate	Committed Amount	Amount Drawn Thru Report Year	Amount Available to Draw	Amount Drawn in Report Year
2013 12	(2013) HOME TBRA (RIC) 2013-14 Rental subsidy program, which is part of the strategy to end chronic homelessness. Designed to help individuals and families by offering assistance up to a period not to exceed 24 months to acquire permanent housing. Program administered by Reinvestment In Communities, Inc.	HOME	\$30,000.00	\$0.00	\$0.00	\$0.00	\$0.00
13	(2013) HOME Direct Homeownership Asst. Homeowner Assistance Program provides up to a maximum of \$5,000.00 in down payment and closing cost assistance to assist low/mod income buyers.	HOME	\$335,961.00	\$433,809.18	\$253,809.18	\$180,000.00	\$253,809.18
14	(2013) CDBG HOUSING REHABILITATION Program designed to assist low to moderate income families address health and safety issues, HQS, energy conservation, handicap accessibility, and water/sewer taps.	CDBG	\$229,245.00	\$97,288.89	\$65,470.69	\$31,818.00	\$65,470.69
15	(2013) Hope 4 Gaston 2014 to provide compassionate, loving support through minor home repairs through a cooperative effort of churches, local government, and community citizens. The City of Gastonia, in partnership with Hope 4 Gaston, provides funding for repair materials costs only. Eligible Applicants: MHI 50% or below the Area Median Income for program year qualifies for grant assistance and loan is available. defined in 24CFR Part 5	CDBG	\$10,000.00	\$10,000.00	\$1,521.97	\$8,478.03	\$1,521.97

OFFICE OF COMMUNITY PLANNING AND DEVELOPMENT

PR01 - HUD Grants and Program Income

Program	Fund Type	Grantee Name	Grant Number	Authorized Amount	Suballocated Amount	Amount Committed to Activities	Net Drawn Amount	YTD Net Draw Amount	Available to Commit	Available to Draw	Receipture Amount
CDBG	EN	GASTONIA	B89MC370006	\$604,000.00	\$0.00	\$604,000.00	\$604,000.00	\$0.00	\$0.00	\$0.00	\$0.00
			B90MC370006	\$579,000.00	\$0.00	\$579,000.00	\$579,000.00	\$0.00	\$0.00	\$0.00	\$0.00
			B91MC370006	\$653,000.00	\$0.00	\$653,000.00	\$653,000.00	\$0.00	\$0.00	\$0.00	\$0.00
			B92MC370006	\$886,000.00	\$0.00	\$886,000.00	\$886,000.00	\$0.00	\$0.00	\$0.00	\$0.00
			B93MC370006	\$768,000.00	\$0.00	\$768,000.00	\$768,000.00	\$0.00	\$0.00	\$0.00	\$0.00
			B94MC370006	\$836,000.00	\$0.00	\$836,000.00	\$836,000.00	\$0.00	\$0.00	\$0.00	\$0.00
			B95MC370006	\$758,000.00	\$0.00	\$758,000.00	\$758,000.00	\$0.00	\$0.00	\$0.00	\$0.00
			B96MC370006	\$739,000.00	\$0.00	\$739,000.00	\$739,000.00	\$0.00	\$0.00	\$0.00	\$0.00
			B97MC370006	\$727,000.00	\$0.00	\$727,000.00	\$727,000.00	\$0.00	\$0.00	\$0.00	\$0.00
			B98MC370006	\$693,000.00	\$0.00	\$693,000.00	\$693,000.00	\$0.00	\$0.00	\$0.00	\$0.00
			B99MC370006	\$697,000.00	\$0.00	\$697,000.00	\$697,000.00	\$0.00	\$0.00	\$0.00	\$0.00
			B00MC370006	\$694,000.00	\$0.00	\$694,000.00	\$694,000.00	\$0.00	\$0.00	\$0.00	\$0.00
			B01MC370006	\$739,000.00	\$0.00	\$739,000.00	\$739,000.00	\$0.00	\$0.00	\$0.00	\$0.00
			B02MC370006	\$732,000.00	\$0.00	\$732,000.00	\$732,000.00	\$0.00	\$0.00	\$0.00	\$0.00
			B03MC370006	\$792,000.00	\$0.00	\$792,000.00	\$792,000.00	\$0.00	\$0.00	\$0.00	\$0.00
			B04MC370006	\$772,000.00	\$0.00	\$772,000.00	\$772,000.00	\$0.00	\$0.00	\$0.00	\$0.00
			B05MC370006	\$729,606.00	\$0.00	\$729,606.00	\$729,606.00	\$0.00	\$0.00	\$0.00	\$0.00
			B06MC370006	\$655,738.00	\$0.00	\$655,738.00	\$655,738.00	\$0.00	\$0.00	\$0.00	\$0.00
			B07MC370006	\$654,276.00	\$0.00	\$654,276.00	\$654,276.00	\$0.00	\$0.00	\$0.00	\$0.00
			B08MC370006	\$631,500.00	\$0.00	\$631,500.00	\$631,500.00	\$0.00	\$0.00	\$0.00	\$0.00
			B09MC370006	\$640,231.00	\$0.00	\$640,231.00	\$640,231.00	\$0.00	\$0.00	\$0.00	\$0.00
			B10MC370006	\$694,538.00	\$0.00	\$694,538.00	\$694,538.00	\$0.00	\$0.00	\$0.00	\$0.00
			B11MC370006	\$579,155.00	\$0.00	\$579,155.00	\$579,155.00	\$0.00	\$0.00	\$0.00	\$0.00
			B12MC370006	\$579,945.00	\$0.00	\$579,945.00	\$579,945.00	\$447,461.42	\$0.00	\$46,510.47	\$0.00
			B13MC370006	\$661,507.00	\$0.00	\$661,507.00	\$661,507.00	\$0.00	\$499,191.87	\$661,507.00	\$0.00
			B14MC370006	\$706,401.00	\$0.00	\$706,401.00	\$706,401.00	\$0.00	\$706,401.00	\$706,401.00	\$0.00
			<b>GASTONIA Subtotal:</b>	<b>\$18,001,897.00</b>	<b>\$0.00</b>	<b>\$16,796,304.13</b>	<b>\$16,587,478.53</b>	<b>\$447,461.42</b>	<b>\$1,205,592.87</b>	<b>\$1,414,418.47</b>	<b>\$0.00</b>
			<b>EN Subtotal:</b>	<b>\$18,001,897.00</b>	<b>\$0.00</b>	<b>\$16,796,304.13</b>	<b>\$16,587,478.53</b>	<b>\$447,461.42</b>	<b>\$1,205,592.87</b>	<b>\$1,414,418.47</b>	<b>\$0.00</b>
			<b>GASTONIA</b>	<b>\$0.00</b>	<b>\$0.00</b>	<b>\$0.00</b>	<b>\$0.00</b>	<b>\$0.00</b>	<b>\$0.00</b>	<b>\$0.00</b>	<b>\$0.00</b>
			<b>GASTONIA Subtotal:</b>	<b>\$0.00</b>	<b>\$0.00</b>	<b>\$0.00</b>	<b>\$0.00</b>	<b>\$0.00</b>	<b>\$0.00</b>	<b>\$0.00</b>	<b>\$0.00</b>
			<b>SL Subtotal:</b>	<b>\$0.00</b>	<b>\$0.00</b>	<b>\$0.00</b>	<b>\$0.00</b>	<b>\$0.00</b>	<b>\$0.00</b>	<b>\$0.00</b>	<b>\$0.00</b>
			<b>GASTONIA</b>	<b>\$359,071.28</b>	<b>\$0.00</b>	<b>\$359,071.28</b>	<b>\$359,071.28</b>	<b>\$0.00</b>	<b>\$0.00</b>	<b>\$0.00</b>	<b>\$0.00</b>
			B99MC370006	\$174,765.62	\$0.00	\$174,765.62	\$174,765.62	\$0.00	\$0.00	\$0.00	\$0.00
			B00MC370006	\$41,732.06	\$0.00	\$41,732.06	\$41,732.06	\$0.00	\$0.00	\$0.00	\$0.00
			B01MC370006	\$110,957.06	\$0.00	\$110,957.06	\$110,957.06	\$0.00	\$0.00	\$0.00	\$0.00
			B02MC370006	\$60,840.97	\$0.00	\$60,840.97	\$60,840.97	\$0.00	\$0.00	\$0.00	\$0.00
			B03MC370006	\$16,370.14	\$0.00	\$16,370.14	\$16,370.14	\$0.00	\$0.00	\$0.00	\$0.00
			B04MC370006	\$22,141.31	\$0.00	\$22,141.31	\$22,141.31	\$0.00	\$0.00	\$0.00	\$0.00
			B05MC370006	\$18,045.89	\$0.00	\$18,045.89	\$18,045.89	\$0.00	\$0.00	\$0.00	\$0.00
			B06MC370006	\$24,754.50	\$0.00	\$24,754.50	\$24,754.50	\$0.00	\$0.00	\$0.00	\$0.00
			B07MC370006	\$236,305.10	\$0.00	\$236,305.10	\$236,305.10	\$0.00	\$0.00	\$0.00	\$0.00
			B08MC370006	\$7,953.04	\$0.00	\$7,953.04	\$7,953.04	\$0.00	\$0.00	\$0.00	\$0.00
			B09MC370006	\$2,974.24	\$0.00	\$2,974.24	\$2,974.24	\$0.00	\$0.00	\$0.00	\$0.00
			B10MC370006	\$4,061.80	\$0.00	\$4,061.80	\$4,061.80	\$0.00	\$0.00	\$0.00	\$0.00

OFFICE OF COMMUNITY PLANNING AND DEVELOPMENT

PR01 - HUD Grants and Program Income

Program Type	Fund Type	Grantee Name	Grant Number	Authorized Amount	Suballocated Amount	Amount Committed to Activities	Net Drawn Amount	YTD Net Draw Amount	Available to Commit	Available to Draw	Recapture Amount
CDBG	PI	GASTONIA	B11MC370006	\$4,539.85	\$0.00	\$4,539.85	\$4,539.85	\$0.00	\$0.00	\$0.00	\$0.00
			B12MC370006	\$5,010.46	\$0.00	\$5,010.46	\$5,010.46	\$4,310.46	\$0.00	\$0.00	\$0.00
			B13MC370006	\$4,140.20	\$0.00	\$4,140.20	\$4,140.20	\$4,140.20	\$0.00	\$0.00	\$0.00
GASTONIA Subtotal:			\$1,093,683.52	\$0.00	\$1,093,683.52	\$1,093,683.52	\$8,450.66	\$0.00	\$0.00	\$0.00	
HOME	EN	GASTONIA	PI Subtotal:	\$1,093,683.52	\$0.00	\$1,093,683.52	\$1,093,683.52	\$8,450.66	\$0.00	\$0.00	\$0.00
			M93DC370202	\$500,000.00	\$150,000.00	\$350,000.00	\$350,000.00	\$0.00	\$0.00	\$0.00	\$0.00
			M94DC370202	\$480,000.00	\$144,000.00	\$336,000.00	\$336,000.00	\$0.00	\$0.00	\$0.00	\$0.00
			M95DC370202	\$816,000.00	\$180,600.00	\$335,400.00	\$335,400.00	\$0.00	\$0.00	\$0.00	\$0.00
			M96DC370202	\$466,000.00	\$138,800.00	\$326,200.00	\$326,200.00	\$0.00	\$0.00	\$0.00	\$0.00
			M97DC370202	\$454,000.00	\$136,200.00	\$317,800.00	\$317,800.00	\$0.00	\$0.00	\$0.00	\$0.00
			M98DC370202	\$479,000.00	\$143,700.00	\$335,300.00	\$335,300.00	\$0.00	\$0.00	\$0.00	\$0.00
			M99DC370202	\$517,000.00	\$155,100.00	\$361,900.00	\$361,900.00	\$0.00	\$0.00	\$0.00	\$0.00
			M00DC370202	\$516,000.00	\$189,294.57	\$346,705.43	\$346,705.43	\$0.00	\$0.00	\$0.00	\$0.00
			M01DC370202	\$572,000.00	\$204,699.02	\$367,300.98	\$367,300.98	\$0.00	\$0.00	\$0.00	\$0.00
			M02DC370202	\$731,000.00	\$223,875.23	\$507,124.77	\$507,124.77	\$0.00	\$0.00	\$0.00	\$0.00
			M03DC370202	\$808,015.20	\$390,619.33	\$417,395.87	\$417,395.87	\$0.00	\$0.00	\$0.00	\$0.00
			M04DC370202	\$908,125.00	\$385,950.85	\$522,174.15	\$522,174.15	\$0.00	\$0.00	\$0.00	\$0.00
M05DC370202	\$803,847.00	\$249,717.22	\$554,129.78	\$554,129.78	\$0.00	\$0.00	\$0.00	\$0.00			
M06DC370202	\$742,658.00	\$221,657.98	\$521,000.02	\$521,000.02	\$0.00	\$0.00	\$0.00	\$0.00			
M07DC370202	\$790,593.00	\$307,230.80	\$483,362.20	\$483,362.20	\$0.00	\$0.00	\$0.00	\$0.00			
M08DC370202	\$828,924.00	\$205,362.70	\$623,561.30	\$623,561.30	\$0.00	\$0.00	\$0.00	\$0.00			
M09DC370202	\$912,715.00	\$273,814.50	\$638,900.50	\$638,900.50	\$0.00	\$0.00	\$0.00	\$0.00			
M10DC370202	\$907,748.00	\$289,056.97	\$638,691.03	\$638,691.03	\$0.00	\$0.00	\$0.00	\$0.00			
M11DC370202	\$797,856.00	\$259,356.80	\$344,223.38	\$344,223.38	\$151,028.22	\$151,028.22	\$194,275.82	\$387,470.98	\$0.00		
M12DC370202	\$379,205.50	\$165,942.25	\$0.00	\$0.00	\$0.00	\$0.00	\$213,263.25	\$213,263.25	\$0.00		
M13DC370202	\$138,365.50	\$138,365.50	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00		
M14DC370202	\$622,969.00	\$155,742.25	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$467,226.75	\$467,226.75	\$0.00	
GASTONIA Subtotal:			\$13,872,021.20	\$4,670,065.97	\$8,327,169.41	\$8,133,974.25	\$316,427.79	\$874,765.82	\$1,067,960.98	\$0.00	
EN Subtotal:			\$13,872,021.20	\$4,670,065.97	\$8,327,169.41	\$8,133,974.25	\$316,427.79	\$874,765.82	\$1,067,960.98	\$0.00	
HOME	EN	GASTONIA	M98DC370202	\$363,952.46	\$0.00	\$363,952.46	\$363,952.46	\$0.00	\$0.00	\$0.00	\$0.00
			M99DC370202	\$715,842.23	\$0.00	\$715,842.23	\$715,842.23	\$0.00	\$0.00	\$0.00	\$0.00
			M00DC370202	\$144,945.76	\$0.00	\$144,945.76	\$144,945.76	\$0.00	\$0.00	\$0.00	\$0.00
			M01DC370202	\$330,990.24	\$0.00	\$330,990.24	\$330,990.24	\$0.00	\$0.00	\$0.00	\$0.00
			M02DC370202	\$45,752.39	\$0.00	\$45,752.39	\$45,752.39	\$0.00	\$0.00	\$0.00	\$0.00
			M03DC370202	\$270,129.32	\$0.00	\$270,129.32	\$270,129.32	\$0.00	\$0.00	\$0.00	\$0.00
			M04DC370202	\$197,865.55	\$0.00	\$197,865.55	\$197,865.55	\$0.00	\$0.00	\$0.00	\$0.00
			M05DC370202	\$182,762.27	\$0.00	\$182,762.27	\$182,762.27	\$0.00	\$0.00	\$0.00	\$0.00
			M06DC370202	\$37,073.82	\$0.00	\$37,073.82	\$37,073.82	\$0.00	\$0.00	\$0.00	\$0.00
			M07DC370202	\$162,073.06	\$0.00	\$162,073.06	\$162,073.06	\$0.00	\$0.00	\$0.00	\$0.00
			M08DC370202	\$47,579.96	\$0.00	\$47,579.96	\$47,579.96	\$0.00	\$0.00	\$0.00	\$0.00
			M09DC370202	\$44,331.70	\$0.00	\$44,331.70	\$44,331.70	\$0.00	\$0.00	\$0.00	\$0.00
			M10DC370202	\$29,928.43	\$0.00	\$29,928.43	\$29,928.43	\$0.00	\$0.00	\$0.00	\$0.00
M11DC370202	\$32,509.81	\$0.00	\$32,509.81	\$32,509.81	\$0.00	\$0.00	\$0.00	\$0.00			
M12DC370202	\$84,883.98	\$0.00	\$84,883.98	\$84,883.98	\$18,660.21	\$18,660.21	\$0.00	\$0.00			
M13DC370202	\$14,394.19	\$0.00	\$14,394.19	\$14,394.19	\$14,394.19	\$14,394.19	\$0.00	\$0.00			

PR01 - HUD Grants and Program Income

Program	Fund Type	Grantee Name	Grant Number	Authorized Amount	Suballocated Amount	Amount Committed to Activities	Net Drawn Amount	YTD Net Draw Amount	Available to Commit	Available to Draw	Recapture Amount
HOME	PI	GASTONIA	GASTONIA Subtotal:	\$2,705,015.17	\$0.00	\$2,705,015.17	\$2,705,015.17	\$33,044.40	\$0.00	\$0.00	\$0.00
		PI Subtotal:		\$2,705,015.17	\$0.00	\$2,705,015.17	\$2,705,015.17	\$33,044.40	\$0.00	\$0.00	\$0.00
GRANTEE				\$35,672,616.89	\$4,670,085.97	\$28,922,172.23	\$28,520,151.47	\$805,384.27	\$2,080,358.69	\$2,482,379.45	\$0.00

U.S. Department of Housing and Urban Development  
 Office of Community Planning and Development  
 Integrated Disbursement and Information System  
 Program Income Details by Fiscal Year and Program  
 GASTONIA,NC

Date: 09-09-14  
 Time: 12:29  
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Report for Program:CDBG, HOME  
 Voucher Dates:07-01-2013 to 06-30-2014

Program Year	Program	Associated Grant Number	Fund Type	Estimated Income for Year	Transaction	Voucher #	Voucher Created	Voucher Type	IDIS Proj. ID	IDIS Actv. ID	Matrix Code	Received/Drawn Amount
2012	CDBG	B12MC370006	PI	5,010.46	RECEIPTS	5131966001	04-21-14		1	1917	21A	4,310.46
					DRAWS	5682662003	04-25-14	PY	14	2074	14A	2,425.61
						5682662004	04-25-14	PY	14	2070	14A	1,884.85
												4,310.46
												4,310.46
												0.00
2012	HOME	M12DC370202	PI	19,566.88	RECEIPTS	5131963001	04-21-14					18,650.21
					DRAWS	5682706001	04-25-14	PY	13	2084		3,193.83
						5682706002	04-25-14	PY	13	2082		3,509.87
						5682706003	04-25-14	PY	13	2081		5,800.00
						5682706004	04-25-14	PY	13	2079		2,689.36
						5682706005	04-25-14	PY	13	2075		3,457.15
						5682706007	04-25-14	PY	13	2072		0.00
												18,650.21

Program Year	Program	Associated Grant Number	Fund Type	Estimated Income for Year	Transaction	Voucher #	Voucher Created	Voucher Type	IDIS Proj. ID	IDIS Actv. ID	Matrix Code	Received/Drawn Amount
2013	CDBG	B13MC370006	PI	7,245.35							PI Draws	18,650.21
											PA Draws	0.00
											Balance	0.00
					RECEIPTS							
					DRAWS							
						5132002001	04-22-14		1	2029	21A	3,105.15
						5682662005	04-25-14	PY	14	2070	14A	3,105.15
											Receipts	3,105.15
											Draws	3,105.15
											Balance	0.00
2013	HOME	M13DC370202	PI	24,594.88								
					RECEIPTS							
					DRAWS							
						5132003001	04-22-14					10,200.69
						5682706006	04-25-14	PY	13	2075		1,842.85
						5682706008	04-25-14	PY	13	2072		5,480.48
						5701453002	06-20-14	PY	13	2089		2,877.36
											Receipts	10,200.69
											PI Draws	10,200.69
											PA Draws	0.00
											Balance	0.00

**FAIR HOUSING ACTION PLAN**  
**City of Gastonia**

WHEREAS, the Congress of the United States in 1866 (the 1866 Civil Rights Act, 42 U.S.C.1982) has declared that all citizens of the United States shall have the same rights to inherit, purchase, lease, sell, hold and convey real and personal property;

WHEREAS, the Congress of the United States has further declared by the Civil Rights Act of 1968, known as the Fair Housing Act (P.L. 90-284) (18 U.S.C. 245) (hereinafter called the "ACT") that it is the policy of the United States to provide, within Constitutional limitations, for fair housing throughout the United States, thereby prohibiting discrimination by reason of race, color, religion, national origin, or sex in the sale or rental of housing; and

WHEREAS, Section 808 and 809 of the ACT provide that the authority and responsibility for administering the ACT shall be vested in the Secretary of Housing and Urban Development (hereinafter called the "Secretary") and the Secretary is required to cooperate with and render technical assistance to private agencies, groups and institutions which are formulating or carrying on programs to prevent or eliminate discriminatory housing practices and to undertake conciliatory activities which will further the purpose of fair housing and to work out programs of voluntary compliance with the cooperation and advice of the housing industry and other interested persons; and

WHEREAS, the City of Gastonia will comply with the requirements of Chapter 41A of the North Carolina General Statutes and the North Carolina Fair Housing Act,

WHEREAS, the City of Gastonia believes that the national policy of fair housing can effectively be promoted through programs of affirmative action in the private housing industry and markets; and

WHEREAS, the City of Gastonia believes it desirable to establish a local fair housing plan for the purpose of effectuating the requirements of all applicable fair housing laws;

NOW, THEREFORE, in order to encourage public and private cooperation in achieving fair housing through affirmative action and other efforts, the City of Gastonia establishes this **FAIR HOUSING ACTION PLAN** ("Plan"):

**STATEMENT OF EQUAL HOUSING OPPORTUNITY POLICY**

The City has a policy of promoting and assuring equal housing opportunity based on aforementioned civil rights legislation. This policy is intended to be consistent with, and to meet the requirements and objectives of the Civil Rights Act of 1968, Title V or the National Housing Act (as amended), and all legislation related to non-discrimination in housing. To implement this policy, the City has adopted this plan, the principal objectives of which are (1) to take steps to encourage full compliance with all the requirements of the fair housing laws by all affected private and public persons, institutions, agencies, or

bodies and (2) where appropriate, promote and encourage affirmative marketing and similar efforts within the City. While the principal persons, institutions, agencies and bodies who potentially will make the greatest contribution to achieving the attainment of the above objectives are realtors, lenders, developers, apartment and other rental unit owners and managers and City and governmental units having responsibility for building and providing housing, the Citizens Advisory Board for the City of Gastonia also believes that it is important to strive for maximum public awareness and participation in the process of achieving these fair housing objectives.

The City of Gastonia Community Development Division exercises personal leadership in carrying out the City's equal housing responsibilities and the City of Gastonia Neighborhood and Community Resources Department shall oversee the implementation of this plan. The Community Development Division shall designate a Fair Housing Officer, who along with the City of Gastonia Citizens Advisory Board, and the Community Development Division shall develop and recommend plans and actions for carrying out the objectives of this equal housing opportunity policy.

Positive action and initiative should be taken if housing is to be open to all. Accordingly, specific educational and other goals will be established and good faith effort by all City of Gastonia department heads in helping to achieve such goals will be required. The City must reach out and draw upon all possible sources so that men and women of all backgrounds are aware of housing opportunities within the City:

**STATEMENT OF GOALS:**

1. To seek full compliance by all citizens with all Fair Housing Laws, including, but not limited to, Title VIII of the Civil Rights Act of 1968, Title V of the National Housing Act (as amended), and the North Carolina Fair Housing Act (Chapter 41A of North Carolina General Statutes).
2. To identify and work with those persons, groups or agencies having resources and ability to significantly impact the achievement of the fair housing objectives set forth above.
3. To identify impediments to fair housing and work toward resolving those issues that hinder the achievement of the fair housing objectives .
4. To promote fair housing in the City of Gastonia by dissemination of relevant information as to fair housing requirements to all persons having a direct involvement and interest in the provision of housing, including realtors, leading institutions, developers, apartment and other rental unit owners and affected City agencies. More specifically it is intended that workshops and other educational sessions be held for the following purpose, among others:
  - a) to review equal opportunity lending programs with local lending institutions;

- b) to review with realtors, developers and multi-unit dwelling owners or managers the requirements of federal and state Fair Housing Laws affecting them, and to offer guidance or assistance to such persons as to affirmative marketing and other techniques;
- c) to hold general public information sessions to review housing requirements and impact;
- d) to assist affected City agencies in the administration of City programs or requirements which impact housing opportunities; and
- e) to encourage generally greater understanding and familiarity with both the objective of equal housing opportunity and the various techniques by which such objective may be furthered.

## **ADMINISTRATION**

1. General responsibility for implementation and day-to-day administration of this Plan will be directed by the City of Gastonia Fair Housing Officer and shall be vested with the City of Gastonia Community Development Division under the direction of the City of Gastonia Neighborhood and Community Resources Department.
2. General responsibility for periodically evaluating the extent to which the objectives of this Plan have been achieved, for identifying problem areas and recommending changes to this Plan and for working with providers and other private groups to develop education and other programs to carry out the objectives of this Plan, shall be vested with the Neighborhood and Community Resources Department and those staff members assigned responsibility thereof.
3. The Community Development Division will work with the North Carolina Human Relations Commission to assist in the performance of these obligations.
4. The Community Development Division will work in accordance with the City of Gastonia Analysis of Impediments to Fair Housing (see Exhibit A) to address and identify those areas of concern which hinder the accessibility of equal housing opportunities for the citizens of the City of Gastonia..

## **IMPLEMENTATION**

### *1. Dissemination*

- a) Copies of this plan shall be distributed to all local governmental departments, agencies, boards and commissions having any official responsibility relating to any aspect of housing opportunities within the City.
- b) Copies of this plan shall be made available to all persons, institutions or agencies, public and private, having a direct involvement and interest in the provisions of housing.

- c) Each provider shall be requested to disseminate to their agents and employees having responsibility for housing-related functions, copies of the Plan in order that such agents and employees may be familiar with such policy.

## *2. Educational Programs*

The City of Gastonia Community Development Division in association with the North Carolina Human Relations Commission shall establish a timetable for working with available private resource personnel to develop and present fair housing training programs and diversity workshops as will best further the objectives of this plan.

The City of Gastonia Community Development Division shall participate in community awareness activities that will educate citizens as to their rights and responsibilities under the Fair Housing Act by maintaining a Fair Housing Hotline at (704) 866-6750

The City of Gastonia Community Development Division will secure and develop brochures and information packets for Spanish-speaking citizens on Fair Housing and related housing providers such as realtors, mortgage and lending institutions and rental agents.

## **REVIEW PROCEDURES**

The Fair Housing Officer for the City of Gastonia shall have the primary responsibility for reviewing the day-to-day effectiveness of the efforts to carry out the objectives of this plan, including:

1. Requesting providers who furnish services to the City to affix their commitment to equal opportunity housing objectives and provide an annual statement indicating their familiarity with the responsibilities imposed upon them under the provisions of the federal and state Fair Housing Laws;
2. Requesting those local banking institutions who are signatories to the program to furnish to the City copies of the reports to the Department of Housing and Urban Development required under that agreement;
3. Obtaining confirmation from affected providers and City agencies of their receipt and, where applicable, their subsequent re-dissemination of this Plan.
4. To the extent consistent with the privacy rights of individual citizens, maintaining information as to the achievement of those providers whom have adopted fair housing or affirmative marketing plans in order to document the usefulness and achievement relating to the goals established under this Plan.

## **DISCRIMINATION & COMPLAINT PROCEDURES**

Any person who feels that he or she has been discriminated against in an attempt to secure housing within the City of Gastonia may file a complaint with the Fair

Housing Officer of the City of Gastonia. The Fair Housing Office is located at 181 South Street Room 206 City Hall Gastonia, NC 28052. and the phone number is 704-866-6750. **Complaints shall be filed no later than sixty (60) days after the act of discrimination occurred.** To facilitate and standardize the complaint filing procedure, forms provided by the Department of Housing and Urban Development (HUD) may be used. Additional forms or background information will be developed as required.

The Fair Housing Officer shall review the complaint and if she determines that the complaint may be in violation of the Fair Housing Act, the complainant shall be referred to Department of Housing and Urban Development and/or the The North Carolina Human Relations Commission. The Fair Housing Officer shall be responsible for keeping track of all referrals, including progress and status reports, and providing whatever assistance is needed by the agencies involved.

**Complaints shall be filed with North Carolina Human Relations Commission or HUD no later than one hundred eighty (180) days after the alleged unfair act of discrimination occurred.**

#### **TECHNICAL ASSISTANCE**

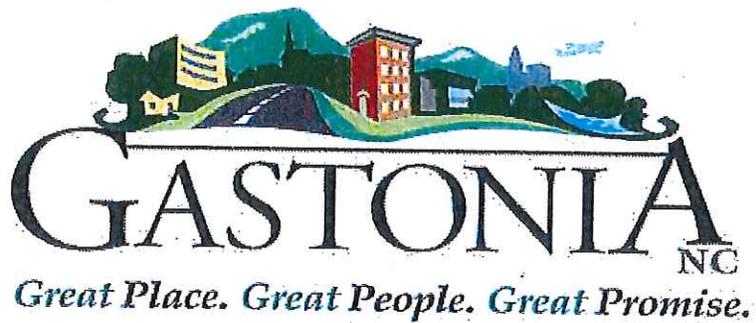
The Fair Housing Officer shall be authorized to request technical assistance from the Department of Housing and Urban Development as contemplated by Title VIII of the Civil Rights Act of 1968, as and to the extent deemed necessary, to aid in the effectuation and implementation of this Plan.

#### **EVALUATION AND PERIODIC REPORTING**

1. The Fair Housing Officer initially shall review the progress achieved under this Plan within six months and twelve months following adoption hereof by the City of Gastonia Citizens Advisory Board and report their evaluations and recommendations in connection therewith to the Community Development Division. Thereafter, such review and evaluation shall be made annually.
2. If otherwise during the term of this Plan, the Fair Housing Officer shall determine that any of the provisions of this Plan require modification or amendment, he/she shall forward his/her recommendations to the Administrator of Community Development Division and the Citizens Advisory Board for approval or disapproval.
3. In carrying out such review and evaluation, the Fair Housing Officer shall use his/her best efforts to involve providers and other persons affected by the Plan for the purpose of obtaining their views as to the achievements or deficiencies or for suggestions for improving the implementation of this Plan.



**AFFIRMATIVE FAIR HOUSING MARKETING  
PLAN AND PROCEDURES**



**City of Gastonia/Gastonia Consortium**

150 S York Street  
Gastonia, NC 28052  
(704) 866-6752

## City of Gastonia/Gastonia Consortium

### AFFIRMATIVE FAIR HOUSING MARKETING PLAN AND PROCEDURES

#### I. STATEMENT

This Affirmative Fair Housing Marketing Plan and Procedures ("Marketing Plan") is developed for use with the HOME Investment Partnership ("HOME") Program and HOME-funded projects in accordance with the HOME Program regulations, including but not limited to 24 CFR 92.351, of the U.S. Division of Housing and Urban Development ("HUD") regulations. The Plan is a commitment of the Gastonia/Gastonia Consortium ("the Consortium"), Consortium staff, and the HOME-funded participant ("Grantee") to affirmatively further Fair Housing. The Grantee shares responsibility with the Consortium in informing the public about the Federal Fair Housing laws, soliciting eligible persons without regard to race, color, national origin, sex, sexual orientation, source of income, religion, familial status, or disability into the affordable housing market and evaluating the effectiveness of these marketing efforts.

Affirmative marketing differs from general marketing activities because it specifically targets potential tenants and home buyers who are least likely to apply for and/or purchase housing. Efforts are made to make these persons aware of the available affordable housing. This Marketing Plan is a guide to assist the Gastonia/Gastonia Consortium and its grantees by summarizing the affirmative marketing procedures required by HUD.

This Plan is documented and maintained in the Housing & Neighborhoods Division of the City of Gastonia's files, and shall be included by reference in all HOME project proposals, made an integral part of all HOME and CHDO funding agreements and HOME case files. The Grantee is held to the terms of the Marketing Plan by the requirements in the applicable HOME or Community Housing Development Organization ("CHDO") agreement.

#### II. PURPOSE

In accordance with the regulations of the HOME Program and in furtherance of the Consortium's commitment to non-discrimination and equal housing opportunity, the Consortium establishes procedures to affirmatively market the distribution of its annual HOME allocation and housing units constructed or rehabilitated under the HOME Program.

It is the Affirmative Marketing Policy of the Consortium to assure that organizations, non-profit and for-profit, and local units of government which might not normally apply for use of the Consortium's HOME funds because they are unaware of the availability of said funds:

- be informed of HOME funding availability
- be encouraged to apply for use of HOME funding
- have an equal opportunity to apply for use of HOME funding

It is the Affirmative Marketing Policy of the Consortium to assure that individuals who normally might not apply for available housing units because they are socially and/or economically disadvantaged:

- be informed of available housing units

- be encouraged to apply for available housing units
- have an equal opportunity to rent/own their own housing units

### III. METHODS TO DISSEMINATE AFFIRMATIVE FAIR HOUSING MARKETING REQUIREMENTS:

The Consortium will use the following methods to inform the public, potential tenants, potential homeowners, potential and existing for-profit developers, and potential and existing non-profit developers, and local units of government about Federal Fair Housing laws and Affirmative Fair Housing Marketing Plan and Procedures.

- Gastonia/Gastonia Consortium staff shall be responsible for implementing the Marketing Plan and evaluating its effectiveness as required by the HOME Program.
- The Consortium shall inform the community about its Affirmative Marketing Policy through periodic updates at public forums, Fair Housing Council meetings as well as training workshops with its HOME and CHDO grantees or other similar forums.
- At the time of HOME funding for rental housing development, the Consortium will provide the Grantee with copies of *Renting Residential Real Estate* and *Questions and Answers on Fair Housing* brochures. The Grantee shall provide initial tenants and rental property owners with copies of these brochures.
- The Consortium will continue to provide general information and telephone reference numbers to persons contacting the Housing & Neighborhoods Division with questions regarding Affirmative Marketing and Federal Fair Housing laws.

### IV. CONSORTIUM AFFIRMATIVE MARKETING REQUIREMENTS

The Consortium will, at least annually, adhere to the following, or similar, Marketing Plan policies regarding announcement of availability of HOME funds:

- Post a notice of HOME funding availability on the City of Gastonia's website.
- Purchase an advertisement for a public notice in a newspaper of general circulation.
- Establish and maintain a database of potentially qualified for-profit and non-profit developers and direct mail invitations to apply for funding (if available).
- Direct mail an invitation to apply for funding to all local units of government participating in the Gastonia/Gastonia Consortium.
- E-mail notices of available funding to the Continuum of Care agencies.

### V. CONSORTIUM REQUIRED AFFIRMATIVE MARKETING RECORD KEEPING

In order to verify that the Consortium is following Marketing Plan requirements the following record keeping procedures will be required:

- The Consortium will maintain records of how HOME funding availability was advertised (copies of advertisements, e-mails, etc.).
- Copies will be maintained of all training materials and meeting agendas where the Consortium's Affirmative Marketing Policy was discussed.

### VI. GRANTEE AFFIRMATIVE FAIR HOUSING MARKETING REQUIREMENTS

Each Grantee using Consortium HOME funds must adhere to the following Marketing Plan policies when HOME-assisted housing units become available for rent or purchase:

- A. Incorporate an Equal Housing Opportunity statement or logo in any correspondence associated with rental or home ownership opportunities developed with the use of Consortium HOME funds.
- B. All marketing of HOME-assisted housing will be jurisdiction-wide and all advertising will be placed in sources of wide circulation. All ads must contain an Equal Housing Opportunity statement or logo.
- C. Media sources should include advertisement to a particular audience (e.g., newspapers or radio stations that serve protected classes).
- D. All advertisements, brochures, and other written materials should be published in at least English and Spanish, in order to reach non-English speaking audiences and displayed.
- E. Contact should be made with organizations whose membership or clientele consists primarily of protected class members.
- F. Notify the Public Housing Authority or Authorities in the county in which units are located when HOME-assisted units are available for rent or purchase.
- G. The project owner must display the Equal Opportunity logo and Fair Housing poster in an area accessible to the public (e.g., rental office).

#### **VII. GRANTEE REQUIRED AFFIRMATIVE MARKETING RECORD KEEPING**

In order to verify that Consortium Grantees are following Marketing Plan, the Consortium requires the following record keeping procedures will be required:

- A. Grantee maintains records of how vacancies were advertised (copies of advertisements, etc.).
- B. Copies of all brochures, leaflets, and letters to community contacts shall be maintained in an easily accessible file.
- C. Grantee shall have a written policy that outlines how all applications will be reviewed and processed. Grantee records should show how all completed and filed applications were processed including whether an applicant was accepted or unaccepted and why an applicant was not accepted.
- D. Maintenance of information on the race, sex, ethnicity, and whether the applicant is disabled for all applicants, home buyers, and tenants. The Consortium will have the Grantee submit this information on at least an annual basis to coincide with the Consortium's submission of its Consolidated Annual Performance and Evaluation Report ("CAPER").
- E. To facilitate collection and reporting of the required data, the Grantee shall fill out and maintain form HUD-935.2 *Affirmative Fair Housing Marketing Plan* (see Attachment A).

This information will be gathered when an application is taken for either a tenant or a home buyer and information will be maintained during the entire affordability period.

## VIII. CONSORTIUM ASSESSMENT OF ITS AFFIRMATIVE MARKETING POLICY

The following actions will be taken by the Consortium to evaluate the success of its Affirmative Fair Housing Marketing Policy and that of its Grantees:

- A. The Consortium will assess the results of its Affirmative Fair Housing Marketing Plan annually with a summary of "good faith efforts" taken by the Consortium as well as its Grantees in the CAPER.
- B. The Consortium will compare the information compiled in the manner described under Section V and Section VII above and evaluate the degree to which statutory and policy objectives were met. If the required steps were taken, the Consortium will determine that good faith efforts have, in fact, been made.
- C. To determine results, the Consortium may examine whether specific groups in the Consortium's service area applied for or became tenants or owners of HOME- or CHDO-funded units that were affirmatively marketed. If the Consortium finds that specific groups are represented, particularly Hispanics, African Americans, Asians, American Indians, persons with disabilities, and women, the Consortium will assume that the Marketing Plan procedures were effective. If one or more groups are not represented within the context of existing neighborhood composition, the Consortium will review its procedures to determine what changes, if any, might be made to make the affirmative marketing efforts more effective.
- D. The Consortium will take corrective action if it is determined that a Grantee has failed to carry out Affirmative Marketing efforts as required. If a Grantee continues to neglect responsibilities made incumbent by the terms of the HOME or CHDO Agreement, the Consortium will consider taking one or both of the following actions:
  1. Declare the Grantee disqualified from any further assistance made available under the HOME Program.
  2. Notify the Grantee of the HOME Program funds that were in violation of the terms of the HOME or CHDO Agreement and the Consortium may exercise its right to require immediate repayment of the HOME funding.
- E. The Consortium will not proceed with corrective action without allowing time and effort by staff to counsel the Grantee in accordance with the terms of the HOME or CHDO Agreement.

**APPENDIX A**  
**HUD FORM 935.2 AND INSTRUCTIONS**  
**AFFIRMATIVE FAIR HOUSING MARKETING PLAN**

**NOTE:** *The attached form is not a requirement of HUD or the City of Gastonia/Gastonia Consortium. It is included to facilitate collection of marketing plan information by Grantees. It does not need to be submitted to HUD or to the City of Gastonia/Gastonia Consortium. The marketing plan information to be collected, with Form 935.2 or by other means, must be accessible to the Consortium or HUD upon request.*

# Affirmative Fair Housing Marketing (AFHM) Plan - Single Family Housing

U.S. Department of Housing and Urban Development  
Office of Fair Housing and Equal Opportunity

OMB Approval No. 2529-0013  
(exp. 12/31/2016)

1a. Applicant's Name, Address (including City, State & Zip code) & Phone Number	1c. Development Number	1d. Number of Units
	1e. Price Range From \$ To \$	1f. Type of Housing <input type="checkbox"/> Development <input type="checkbox"/> Scattered Site
	1g. Approximate Starting Dates (mm/dd/yyyy) Advertising Occupancy	

1b. Development's Name, Location (including City, State and Zip code)	1h. Housing Market Area	1i. Census Tract
	1j. Sales Agent's Name & Address (including City, State and Zip Code)	

<b>2. Type of Affirmative Marketing Area</b> (check all that apply)  <input type="checkbox"/> White (non-minority) Area <input type="checkbox"/> Minority Area <input type="checkbox"/> Mixed Area (with _____ % minority residents)	<b>3. Direction of Marketing Activity</b> (Indicate which group(s) in the housing market area are <b>least</b> likely to apply for the housing because of its location and other factors without special outreach efforts)  <input type="checkbox"/> White <input type="checkbox"/> American Indian or Alaskan Native <input type="checkbox"/> Asian <input type="checkbox"/> Black or African American <input type="checkbox"/> Native Hawaiian or Other Pacific Islander <input type="checkbox"/> Hispanic or Latino <input type="checkbox"/> Persons with Disabilities <input type="checkbox"/> Families with Children <input type="checkbox"/> Other _____ Specify _____ (e.g. specific ethnic group, religion, etc.)
--	---

**4a. Marketing Program: Commercial Media** (Check the type of media to be used to advertise the availability of this housing)

Newspapers/Publications     Radio     TV     Billboards     Other (specify)

Name of Newspaper, Radio or TV Station	Group Identification of Readers/Audience	Size/Duration of Advertising

**4b. Marketing Program: Brochures, Signs, and HUD's Fair Housing Poster**

(1) Will brochures, letters, or handouts be used to advertise?  Yes     No    If "Yes", attach a copy or submit when available.

(2) For development site sign, indicate sign size \_\_\_\_\_ x \_\_\_\_\_; Logo type size \_\_\_\_\_ x \_\_\_\_\_. Attach a photograph of sign or submit when available.

(3) HUD's Fair Housing Poster must be conspicuously displayed wherever sales/rentals and showings take place. Fair Housing Posters will be displayed in the  Sales Office     Real Estate Office     Model Unit     Other (specify)

4c. **Marketing Program: Community Contacts.** To further inform the group(s) least likely to apply about the availability of the housing, the applicant agrees to establish and maintain contact with the groups/organizations listed below which are located in the housing market area. If more space is needed, attach an additional sheet. Notify HUD-Housing of any changes in this list. Attach a copy of correspondence to be mailed to these groups/organizations. (Provide all requested information.)

Name of Group/Organization	Group Identification	Approximate Date (mm/dd/yyyy)	Person Contacted (or to be Contacted)
Address & Phone Number	Method of Contact		Indicate the specific function the Group/Organization will undertake in implementing the marketing program

5. **Reserved**

6. **Experience and Staff Instructions** (See instructions)  
 6a. Staff has affirmative marketing experience.  
 No  Yes  
 6b. On separate sheets, indicate training to be provided to staff on Federal, State and local fair housing laws and regulations, as well as this AFHM Plan. Attach a copy of the instructions to staff regarding fair housing.

7. **Additional Considerations** Attach additional sheets as needed.

8. **Compliance with AFHM Plan Regulations:** By signing this form, the applicant agrees to ensure compliance with HUD's Affirmative Fair Housing Marketing Regulations (24 CFR 200.620).

Signature of person submitting this Plan & Date of Submission (mm/dd/yyyy)

Name (type or print)

Title & Name of Company

For HUD-Office of Housing Use Only	For HUD-Office of Fair Housing and Equal Opportunity Use Only
Approved _____ Disapproved _____ (Check One)	
Signature & Date (mm/dd/yyyy)	Signature & Date (mm/dd/yyyy)
Name (type or print)	Name (type or print)
Title	Title

Public reporting burden for this collection of information is estimated to average 3 hours per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. This agency may not collect this information, and you are not required to complete this form, unless it displays a currently valid Office of Management and Budget (OMB) control number.

**In General:** The Affirmative Fair Housing Marketing (AFHM) Plan is used to ensure that Federal Housing Administration (FHA)-insured single family housing developers are taking necessary steps to eliminate discriminatory practices and to overcome the effects of past discrimination involving Federally insured housing. No application for any housing development insured under the Department of Housing and Urban Development's (HUD) housing programs, shall be funded without a HUD-approved AFHM Plan (See the "Applicability" section in the instructions below.) Single family housing developers complete the AFHM Plan only during the application process and the AFHM Plan is in effect until after initial occupancy. The responses are required to obtain or retain benefits under the Fair Housing Act, Section 808(e)(5) & (6) and 24 CFR Part 200, Subpart M. The form contains no questions of a confidential nature.

**Applicability:** Single family developers should answer the following two questions to determine if they need to complete an AFHM Plan or if they should complete block 11 on Form HUD-92541, Builder's Certification of Plans, Specifications, & Site. (See HUD Mortgagee Letter 1995-18 dated April 28, 1995 and 2001-09 dated April 2, 2001 for further instructions).

Question 1. (Check if applicable)

- a. Did you sell five (5) or more houses in the last twelve (12) months with HUD mortgage insurance?
- b. Do you intend to sell five (5) or more houses within the next twelve (12) months with HUD mortgage insurance?

If you did **not** check 1a or 1b, you do **not** have to complete an AFHM Plan. You should complete block 11 on the HUD-92541.

If you checked 1a and/or 1b, you must go to Question 2.

Question 2. (Check if applicable)

- a. I am a signatory in good standing to a Voluntary Affirmative Marketing Agreement (VAMA).
- b. I have an AFHM Plan that HUD approved.
- c. I have contracted with a company that has an AFHM Plan or who is a signatory to a VAMA to market my houses.
- d. I certify that I will comply with the following: (a) Carry out an affirmative marketing program to attract all minority and majority groups to the housing for initial sale. Such a program shall typically involve publicizing to minority persons the availability of housing opportunities regardless of race, color, religion, sex, disability, familial status or national origin, through the type of media customarily utilized by the applicants; (b) Maintain a nondiscriminatory hiring policy in recruiting from both minority and majority groups; (c) Instruct all employees and agents in writing and orally of the policy of nondiscrimination and fair housing; (d) Conspicuously display the Fair Housing Poster in all Sales Offices, include the Equal Housing Opportunity logo, slogan and statement in all printed material used in connection with sales, and post in a prominent position at the project site a sign that displays the Equal Opportunity logo, slogan or statement, as listed in 24 CFR 200.620 and appendix to subpart M to part 200. I understand that I am obliged to develop and maintain records on these activities, and make them available to HUD upon request.

If you checked "a, b, c, or d" in Question 2, you do **not** have to complete an AFHM Plan. You should complete block 11 on the HUD-92541.

If you did **not** check “a, b, c or d” in Question 2, you must complete an AFHM Plan.

Each applicant is required to carry out an affirmative program to attract prospective buyers of all minority and non-minority groups in the housing market area regardless of their race, color, religion, sex, national origin, disability or familial status (24 CFR 200.620). Racial groups include White, Black or African American, American Indian or Alaska Native, Asian, Native Hawaiian or Other Pacific Islander. Other groups in the housing market area who may be subject to housing discrimination include, but are not limited to, Hispanic or Latino, persons with disabilities, families with children, or persons of different religious affiliations. The applicant shall describe in the AFHM Plan the proposed activities to be carried out during advance marketing, where applicable, and the initial sales period. The affirmative marketing program also should ensure that any group(s) of persons ordinarily **not** likely to apply for this housing without special outreach (See Part 3), know about the housing, feel welcome to apply and have the opportunity to buy.

## INSTRUCTIONS

**Send completed form to:** your local HUD Office  
**Attention:** Director, Office of Housing

### **Part 1-Applicant and Project Identification.**

Blocks 1a thru 1f-Self-Explanatory. Block 1g-the applicant should specify the approximate date for starting the marketing activities and the anticipated date of initial occupancy. Block 1h-the applicant should indicate the housing market area, in which the housing will be located. Block 1i - the applicant may obtain census tract location information from local planning agencies, public libraries and other sources of census data. Block 1j the applicant should complete only if a Sales Agent (the agent can not be the applicant) is implementing the AFHM Plan.

### **Part 2-Type of Affirmative Marketing Area:**

The AFHM Plan should indicate the approximate racial composition of the housing market area in which the housing will be located by checking one of the three choices. Single family scattered site builder should submit an AFHM Plan that reflects the approximate racial composition of each housing market area in which the housing will be located. For example, if a builder plans to construct units in both minority and non-minority housing market areas, a separate AFHM Plan shall be submitted for each housing market area.

**Part 3-Direction of Marketing Activity.** Indicate which group(s) the applicant believes are least likely to apply for this housing without special outreach. Consider factors such as price or rental of

housing, sponsorship of housing, racial/ethnic characteristics of housing market area in which housing will be located, disability, familial status, or religious affiliation of eligible population, public transportation routes, etc.

**Part 4-Marketing Program.** The applicant shall describe the marketing program to be used to attract all segments of the eligible population, especially those groups designated in Part 3 of this AFHM Plan present in the housing marketing area that are least likely to apply. The applicant shall state: the type of media to be used, the names of newspaper/call letters of radio or TV stations; the identity of the circulation or audience of the media identified in the AFHM Plan (e.g., White, Black or African American, American Indian or Alaska Native, Asian, Native Hawaiian or Other Pacific Islander, Hispanic or Latino, persons with disabilities, families with children, and religious affiliation), and the size or duration of newspaper advertising or length and frequency of broadcast advertising. Community contacts include individuals or organizations that are well known in the housing market area or the locality that can influence persons within groups considered least likely to apply. Such contacts may include, but need not be limited to: neighborhood, minority and women’s organizations, grass roots faith-based or other community based organizations, labor unions, employers, public and private agencies, disability advocates, schools and individuals who are connected with these organizations and/or are well-known in the community. Applicants should notify their local HUD-Office of Housing of any changes to the list in Part 4c of this AFHM Plan.

**Part 5-Reserved**

**Part 6-Experience and Staff Instructions.**

- 6a. The applicant should indicate whether he/she has had previous experience in marketing housing to group(s) identified as least likely to apply for the housing.
- 6b. Describe the instructions and training provided or to be provided to sales staff. This guidance to staff must include information regarding Federal, State and local fair housing laws and this AFHM Plan.

Copies of any written materials should be submitted with the AFHM Plan, if such materials are available.

**Part 7-Additional Considerations.** In this section describe other efforts not previously mentioned which are planned to attract persons least likely to apply for the housing.

**Part 8-Compliance with AFHM Plan Regulation.**

By signing, the applicant assumes full responsibility for implementing the AFHM Plan. HUD may monitor the implementation of this AFHM Plan at any time and request modification in its format or content, where deemed necessary.

**Notice of Intent to Begin Marketing.** No later than 90 days prior to the initiation of sales marketing activities, the applicant with an approved AFHM Plan shall submit notice of intent to begin marketing. The notification is required by the Affirmative Fair Housing Marketing Plan Compliance Regulations (24 CFR Part 108.15). It is submitted either orally or in writing to the Office of Housing in the appropriate HUD Office servicing the locality in which the proposed housing will be located.

OMB approval of the Affirmative Fair Housing Plan includes approval of this notification procedure as part of the AFHM Plan. The burden hours for such notification are included in the total designated for this AFHM Plan form.

Note to all applicants/respondents: This form was developed with Nuance, the official HUD software for the creation of HUD forms. HUD has made available instructions for downloading a free installation of a Nuance reader that allows the user to fill-in and save this form in Nuance. Please see <http://portal.hud.gov/portal/documents/huddoc?id=nuancereaderinstall.pdf> for the instructions. Using Nuance software is the only means of completing this form.

**Affirmative Fair Housing Marketing Plan (AFHMP) - Multifamily Housing**

**U.S. Department of Housing and Urban Development  
Office of Fair Housing and Equal Opportunity**

OMB Approval No. 2529-0013  
(exp.12/31/2016)

<b>1a. Project Name &amp; Address (including City, County, State &amp; Zip Code)</b> <div style="border: 1px solid black; height: 150px;"></div>	<b>1b. Project Contract Number</b> <div style="border: 1px solid black; height: 40px;"></div>	<b>1c. No. of Units</b> <div style="border: 1px solid black; height: 40px;"></div>
<b>1d. Census Tract</b> <div style="border: 1px solid black; height: 40px;"></div>		
<b>1e. Housing/Expanded Housing Market Area</b> Housing Market Area: Expanded Housing Market Area:		

**1f. Managing Agent Name, Address (including City, County, State & Zip Code), Telephone Number & Email Address**

**1g. Application/Owner/Developer Name, Address (including City, County, State & Zip Code), Telephone Number & Email Address**

**1h. Entity Responsible for Marketing (check all that apply)**

Owner   
  Agent   
  Other (specify)

Position, Name (if known), Address (including City, County, State & Zip Code), Telephone Number & Email Address

**1i. To whom should approval and other correspondence concerning this AFHMP be sent? Indicate Name, Address (including City, State & Zip Code), Telephone Number & E-Mail Address.**

**2a. Affirmative Fair Housing Marketing Plan**

Plan Type Please Select Plan Type    Date of the First Approved AFHMP:

Reason(s) for current update:

**2b. HUD-Approved Occupancy of the Project (check all that apply)**

Elderly   
  Family   
  Mixed (Elderly/Disabled)   
  Disabled

**2c. Date of Initial Occupancy**

**2d. Advertising Start Date**

Advertising must begin *at least* 90 days prior to initial or renewed occupancy for new construction and substantial rehabilitation projects.

Date advertising began or will begin

**For existing projects, select below the reason advertising will be used:**

To fill existing unit vacancies

To place applicants on a waiting list  (which currently has  individuals)

To reopen a closed waiting list  (which currently has  individuals)

**3a. Demographics of Project and Housing Market Area**  
Complete and submit Worksheet 1.

**3b. Targeted Marketing Activity**

Based on your completed Worksheet 1, indicate which demographic group(s) in the housing market area is/are *least* likely to apply for the housing without special outreach efforts. (check all that apply)

- White       American Indian or Alaska Native       Asian       Black or African American  
 Native Hawaiian or Other Pacific Islander       Hispanic or Latino       Persons with Disabilities  
 Families with Children       Other ethnic group, religion, etc. (specify)

**4a. Residency Preference**

Is the owner requesting a residency preference? If yes, complete questions 1 through 5.  Please Select Yes or No  
If no, proceed to Block 4b.

(1) Type  Please Select Type

(2) Is the residency preference area:  
The same as the AFHMP housing/expanded housing market area as identified in Block 1e?  Please Select Yes or No

The same as the residency preference area of the local PHA in whose jurisdiction the project is located?  Please Select Yes or No

(3) What is the geographic area for the residency preference?

(4) What is the reason for having a residency preference?

(5) How do you plan to periodically evaluate your residency preference to ensure that it is in accordance with the non-discrimination and equal opportunity requirements in 24 CFR 5.105(a)?

Complete and submit Worksheet 2 when requesting a residency preference (see also 24 CFR 5.655(c)(1)) for residency preference requirements. The requirements in 24 CFR 5.655(c)(1) will be used by HUD as guidelines for evaluating residency preferences consistent with the applicable HUD program requirements. See also HUD Occupancy Handbook (4350.3) Chapter 4, Section 4.6 for additional guidance on preferences.

**4b. Proposed Marketing Activities: Community Contacts**

Complete and submit Worksheet 3 to describe your use of community contacts to market the project to those least likely to apply.

**4c. Proposed Marketing Activities: Methods of Advertising**

Complete and submit Worksheet 4 to describe your proposed methods of advertising that will be used to market to those least likely to apply. Attach copies of advertisements, radio and television scripts, Internet advertisements, websites, and brochures, etc.

**5a. Fair Housing Poster**

The Fair Housing Poster must be prominently displayed in all offices in which sale or rental activity takes place (24 CFR 200.620(e)). Check below all locations where the Poster will be displayed.

Rental Office     Real Estate Office     Model Unit     Other (specify)

**5b. Affirmative Fair Housing Marketing Plan**

The AFHMP must be available for public inspection at the sales or rental office (24 CFR 200.625). Check below all locations where the AFHMP will be made available.

Rental Office     Real Estate Office     Model Unit     Other (specify)

**5c. Project Site Sign**

Project Site Signs, if any, must display in a conspicuous position the HUD approved Equal Housing Opportunity logo, slogan, or statement (24 CFR 200.620(f)). Check below all locations where the Project Site Sign will be displayed. Please submit photos of Project signs.

Rental Office     Real Estate Office     Model Unit     Entrance to Project     Other (specify)

The size of the Project Site Sign will be  x

The Equal Housing Opportunity logo or slogan or statement will be  x

**6. Evaluation of Marketing Activities**

Explain the evaluation process you will use to determine whether your marketing activities have been successful in attracting individuals least likely to apply, how often you will make this determination, and how you will make decisions about future marketing based on the evaluation process.

**7a. Marketing Staff**

What staff positions are/will be responsible for affirmative marketing?

---

**7b. Staff Training and Assessment: AFHMP**

- (1) Has staff been trained on the AFHMP?
- (2) Has staff been instructed in writing and orally on non-discrimination and fair housing policies as required by 24 CFR 200.620(c)?
- (3) If yes, who provides instruction on the AFHMP and Fair Housing Act, and how frequently?

- (4) Do you periodically assess staff skills on the use of the AFHMP and the application of the Fair Housing Act?
- (5) If yes, how and how often?

---

**7c. Tenant Selection Training/Staff**

- (1) Has staff been trained on tenant selection in accordance with the project's occupancy policy, including any residency preferences?
- (2) What staff positions are/will be responsible for tenant selection?

---

**7d. Staff Instruction/Training:**

Describe AFHM/Fair Housing Act staff training, already provided or to be provided, to whom it was/will be provided, content of training, and the dates of past and anticipated training. Please include copies of any AFHM/Fair Housing staff training materials.

**8. Additional Considerations** Is there anything else you would like to tell us about your AFHMP to help ensure that your program is marketed to those least likely to apply for housing in your project? Please attach additional sheets, as needed.

**9. Review and Update**

By signing this form, the applicant/respondent agrees to implement its AFHMP, and to review and update its AFHMP in accordance with the instructions to item 9 of this form in order to ensure continued compliance with HUD's Affirmative Fair Housing Marketing Regulations (see 24 CFR Part 200, Subpart M). I hereby certify that all the information stated herein, as well as any information provided in the accompaniment herewith, is true and accurate. Warning: HUD will prosecute false claims and statements. Conviction may result in criminal and/or civil penalties. (See 18 U.S.C. 1001, 1010, 1012; 31 U.S.C. 3729, 3802).

Signature of person submitting this Plan & Date of Submission (mm/dd/yyyy)

Name (type or print)

Title & Name of Company

**For HUD-Office of Housing Use Only**

Reviewing Official:

**For HUD-Office of Fair Housing and Equal Opportunity Use Only**

Approval

Disapproval

Signature & Date (mm/dd/yyyy)

Signature & Date (mm/dd/yyyy)

Name  
(type  
or  
print)

Name  
(type  
or  
print)

Title

Title

Public reporting burden for this collection of information is estimated to average six (6) hours per initial response, and four (4) hours for updated plans, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. This agency may not collect this information, and you are not required to complete this form, unless it displays a currently valid Office of Management and Budget (OMB) control number.

**Purpose of Form:** All applicants for participation in FHA subsidized and unsubsidized multifamily housing programs with five or more units (see 24 CFR 200.615) must complete this Affirmative Fair Housing Marketing Plan (AFHMP) form as specified in 24 CFR 200.625, and in accordance with the requirements in 24 CFR 200.620. The purpose of this AFHMP is to help applicants offer equal housing opportunities regardless of race, color, national origin, religion, sex, familial status, or disability. The AFHMP helps owners/agents (respondents) effectively market the availability of housing opportunities to individuals of both minority and non-minority groups that are least likely to apply for occupancy. Affirmative fair housing marketing and planning should be part of all new construction, substantial rehabilitation, and existing project marketing and advertising activities.

An AFHM program, as specified in this Plan, shall be in effect for each multifamily project throughout the life of the mortgage (24 CFR 200.620(a)). The AFHMP, once approved by HUD, must be made available for public inspection at the sales or rental offices of the respondent (24 CFR 200.625) and may not be revised without HUD approval. This form contains no questions of a confidential nature.

**Applicability:** The form and worksheets must be completed and submitted by all FHA subsidized and unsubsidized multifamily housing program applicants.

#### **INSTRUCTIONS:**

**Send completed form and worksheets to your local HUD Office, Attention: Director, Office of Housing**

#### **Part 1: Applicant/Respondent and Project**

**Identification.** Blocks 1a, 1b, 1c, 1g, 1h, and 1i are self-explanatory.

Block 1d- Respondents may obtain the Census tract number from the U.S. Census Bureau (<http://factfinder2.census.gov/main.html>) when completing Worksheet One.

Block 1e- Respondents should identify both the housing market area and the expanded housing market area for their multifamily housing projects. Use abbreviations if necessary. A **housing market area** is the area from which a multifamily housing project owner/agent may reasonably expect to draw a substantial number of its tenants. This could be a county or Metropolitan Division. The U.S. Census Bureau provides a range of levels to draw from.

An **expanded housing market area** is a larger geographic area, such as a Metropolitan Division or a Metropolitan Statistical Area, which may provide additional demographic diversity in terms of race, color, national origin, religion, sex, familial status, or disability.

Block 1f- The applicant should complete this block only if a Managing Agent (the agent cannot be the applicant) is implementing the AFHMP.

#### **Part 2: Type of AFHMP**

Block 2a- Respondents should indicate the status of the AFHMP, i.e., initial or updated, as well as the date of the first approved AFHMP. Respondents should also provide the reason (s) for the current update, whether the update is based on the five-year review or due to significant changes in project or local demographics (See instructions for Part 9).

Block 2b- Respondents should identify all groups HUD has approved for occupancy in the subject project, in accordance with the contract, grant, etc.

Block 2c- Respondents should specify the date the project was/will be first occupied.

Block 2d- For new construction and substantial rehabilitation projects, advertising must begin at least 90 days prior to initial occupancy. In the case of existing projects, respondents should indicate whether the advertising will be used to fill existing vacancies, to place individuals on the project's waiting list, or to re-open a closed waiting list. Please indicate how many people are on the waiting list when advertising begins.

### **Part 3 Demographics and Marketing Area.**

"Least likely to apply" means that there is an identifiable presence of a specific demographic group in the housing market area, but members of that group are not likely to apply for the housing without targeted outreach, including marketing materials in other languages for limited English proficient individuals, and alternative formats for persons with disabilities. Reasons for not applying may include, but are not limited to, insufficient information about housing opportunities, language barriers, or transportation impediments.

Block 3a - Using Worksheet 1, the respondent should indicate the demographic composition of the project's residents, current project applicant data, census tract, housing market area, and expanded housing market area. The applicable housing market area and expanded housing market area should be indicated in Block 1e. Compare groups within rows/across columns on Worksheet 1 to identify any under-represented group(s) relative to the surrounding housing market area and expanded housing market area, i.e., those group(s) "least likely to apply" for the housing without targeted outreach and marketing. If there is a particular group or subgroup with members of a protected class that has an identifiable presence in the housing market area, but is not included in Worksheet 1, please specify under "Other."

Respondents should use the most current demographic data from the U.S. Census or another official source such as a local government planning office. Please indicate the source of your data in Part 8 of this form.

Block 3b - Using the information from the completed Worksheet 1, respondents should identify the demographic group(s) least likely to apply for the housing without special outreach efforts by checking all that apply.

### **Part 4 - Marketing Program and Residency Preference (if any).**

Block 4a - A residency preference is a preference for admission of persons who reside or work in a specified geographic area (see 24 CFR 5.655(c)(1)(ii)). Respondents should indicate whether a residency preference is being utilized, and if so, respondents should specify if it is new, revised, or continuing. If a respondent wishes to utilize a residency preference, it must state the preference area (and provide a map delineating the precise area) and state the reason for having such a preference. The respondent must ensure that the preference is in accordance with the non-discrimination and equal opportunity requirements in 24 CFR 5.105(a) (see 24 CFR 5.655(c)(1)).

Respondents should use Worksheet 2 to show how the percentage of the eligible population living or working in the residency preference area compares to that of residents of the project, project applicant data, census tract, housing market area, and expanded housing market area. The percentages would be the same as shown on completed Worksheet 1.

Block 4b - Using Worksheet 3, respondents should describe their use of community contacts to help market the project to those least likely to apply. This table should include the name of a contact person, his/her address, telephone number, previous experience working with the target population(s), the approximate date contact was/will be initiated, and the specific role the community contact will play in assisting with affirmative fair housing marketing or outreach.

Block 4c - Using Worksheet 4, respondents should describe their proposed method(s) of advertising to market to those least likely to apply. This table should identify each media option, the reason for choosing this media, and the language of the advertisement. Alternative format(s) that will be used to reach persons with disabilities, and logo(s) that will appear on the various materials (as well as their size) should be described. **Please attach a copy of the advertising or marketing material.**

### **Part 5 - Availability of the Fair Housing Poster, AFHMP, and Project Site Sign.**

Block 5a - The Fair Housing Poster must be prominently displayed in all offices in which sale or rental activity takes place (24 CFR 200.620(e)). Respondents should indicate all locations where the Fair Housing Poster will be displayed.

Block 5b - The AFHMP must be available for public inspection at the sales or rental office (24 CFR 200.625). Check all of the locations where the AFHMP will be available.

Block 5c - The Project Site Sign must display in a conspicuous position the HUD-approved Equal Housing Opportunity logo, slogan, or statement (24 CFR 200.620(f)). Respondents should indicate where the Project Site Sign will be displayed, as well as the size of the Sign and the size of the logo, slogan, or statement. **Please submit photographs of project site signs.**

## **Part 6 - Evaluation of Marketing Activities.**

Respondents should explain the evaluation process to be used to determine if they have been successful in attracting those individuals identified as least likely to apply. Respondents should also explain how they will make decisions about future marketing activities based on the evaluations.

## **Part 7 - Marketing Staff and Training.**

Block 7a - Respondents should identify staff positions that are/will be responsible for affirmative marketing.

Block 7b - Respondents should indicate whether staff has been trained on the AFHMP and Fair Housing Act. Please indicate who provides the training and how frequently. In addition, respondents should specify whether they periodically assess staff members' skills in using the AFHMP and in applying the Fair Housing Act. They should state how often they assess employee skills and how they conduct the assessment.

Block 7c - Respondents should indicate whether staff has been trained on tenant selection in accordance with the project's occupancy policy, including residency preferences (if any). Respondents should also identify those staff positions that are/will be responsible for tenant selection.

Block 7d - Respondents should include copies of any written materials related to staff training, and identify the dates of past and anticipated training.

## **Part 8 - Additional Considerations.**

Respondents should describe their efforts not previously mentioned that were/are planned to attract those individuals least likely to apply for the subject housing.

## **Part 9 - Review and Update.**

By signing the respondent assumes responsibility for implementing the AFHMP. Respondents must review their AFHMP every five years or when the local Community Development jurisdiction's Consolidated Plan is updated, or when there are significant changes in the demographics of the project or the local housing market area. When reviewing the plan, the respondent should consider the current demographics of the housing market area to determine if there have been demographic changes in the population in terms of race, color, national origin, religion, sex, familial status, or disability. The respondent will then determine if the population least likely to apply for the housing is still the population identified in the AFHMP, whether the advertising and publicity cited in the current AFHMP are still appropriate, or whether advertising sources should be modified or expanded. Even if the demographics of the housing market area have not changed, the respondent should determine if the outreach currently being performed is reaching those it is intended to reach as measured by project occupancy and applicant data. If not, the AFHMP should be updated. The revised AFHMP must be submitted to HUD for approval. HUD may review whether the affirmative marketing is actually being performed in accordance with the AFHMP. If based on their review, respondents determine the AFHMP does not need to be revised, they should maintain a file documenting what was reviewed, what was found as a result of the review, and why no changes were required. HUD may review this documentation.

## **Notification of Intent to Begin Marketing.**

No later than 90 days prior to the initiation of rental marketing activities, the respondent must submit notification of intent to begin marketing. The notification is required by the AFHMP Compliance Regulations (24 CFR 108.15). The Notification is submitted to the Office of Housing in the HUD Office servicing the locality in which the proposed housing will be located. Upon receipt of the Notification of Intent to Begin Marketing from the applicant, the monitoring office will review any previously approved plan and may schedule a pre-occupancy conference. Such conference will be held prior to initiation of sales/rental marketing activities. At this conference, the previously approved AFHMP will be reviewed with the applicant to determine if the plan, and/or its proposed implementation, requires modification prior to initiation of marketing in order to achieve the objectives of the AFHM regulation and the plan.

OMB approval of the AFHMP includes approval of this notification procedure as part of the AFHMP. The burden hours for such notification are included in the total designated for this AFHMP form.



# **ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING**

**May 15, 2010**

## ***Equal Housing Opportunity***

*'Equal and free access to residential housing (housing choice) is fundamental to meeting essential needs and pursuing personal, educational, employment, and other goals. Because housing choice is so critical, fair housing is a goal that government, public officials, and private citizens must achieve if equality of opportunity is to become a reality.'*

*-HUD Fair Housing Planning Guide*

*Prepared for the City of Gastonia/Gastonia Consortium  
By MLM Consulting, PO Box 1293, Dallas, NC 28034*

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## INFORMATION RESOURCES

### Public Sector Consultations:

#### City of Gastonia:

Community Development Five-Year Consolidated Plan, May 2010  
Community Development Annual Plan, May 2009  
City Vision 2020 Comprehensive Plan  
Discrimination in Housing Ordinance, 2002  
Analysis of Impediments to Fair Housing, 2002  
Jack L. Kiser, Director of Planning  
Chuck Davis, Billing Division Administrator  
Dawn Martinez, Fair Housing Officer  
Juliann Lehman, Case Management Specialist-Homeownership Program  
Joan Coffey, Financial Manager, TBRA (Reinvestment in Communities)

#### Gastonia Housing Authority:

PHA Annual Plan, 2009  
PHA Tenant Selection Plan  
Gary Foster, Executive Director  
Terri Sanford, Section 8 Program Director  
Shannon Pierce, Community Service Supervisor  
Sam Murphy, Maintenance Director

United States Dept. of Commerce, Bureau of Census, Tables for 2000, 2006 - 2008  
Demographics, Population, Social, Economic and Selected Housing  
Characteristics, 100% data when available and sample data when 100% data  
not available

### Private Sector Consultations:

United Way of Gaston County, Community Needs Survey, 2009

Gaston Association of Realtors, Ann Drum, Executive Officer

BB&T, CRA Charlotte Office, Lanetta Wright

First National Bank, VP/Senior Loan Officer, Holt Robinson

## EXECUTIVE SUMMARY

The City of Gastonia and the Gaston Consortium is committed to non-discriminatory and equal opportunity housing within its boundaries. Support is provided through the City of Gastonia's Fair Housing Ordinance, a Fair Housing Officer and the design of programs that work to expand housing options for all people. Impediments to Fair Housing can be grouped into two major categories: discriminatory practices and market factors that have an impact on housing choice for members of protected classes.

Fair Housing and Affordable Housing have a correlation because the protected class members covered by the Fair Housing Act may include many of the same people that need affordable housing. Therefore, to insure Fair Housing, the expansion of Affordable Housing is a primary goal of Gastonia and the Gaston Consortium.

The fair housing complaint and resolution process for the community allows people who feel they have been discriminated against to seek recourse through a local, state and federal process. Potential impediments and recommendations to improve fair housing and housing choice are identified through data gathered from bankers, housing authorities, local and state government, federal resources and the private sector.

Impediments identified in this Analysis from the resources listed include:

- Aged Housing Stock
- Lack of Affordable Housing
- Public Housing & Housing Choice Voucher Marketing Plan
- Variations in CRA Lending Requirements among loan providers
- Zoning Combined with High Land Cost
- General Public Attitudes toward Affordable Housing
- Lack of Transportation
- Language Barriers

# **Gastonia/Gaston County Consortium**

## **Analysis of Impediments to Fair Housing**

### **I. Introduction**

Fair housing means the right to choose a place to live without regard to race, color, national origin, gender, religion, or because of a disability or minor children in the household. The federal Fair Housing Act (FHA) prohibits discrimination in the sale or rental of housing.

Under the FHA, state and local units of government that receive certain federal housing funds are not only required to refrain from discrimination; they must also take steps to advance the goals of fair housing and use their policies and programs to help promote open and inclusive patterns of housing. Specifically, all units of government that receive Community Development Block Grant (CDBG) and/or Home Investment Partnership Program (HOME) funds are required by the U.S. Department of Housing and Urban Development (HUD) to undertake an Analysis of Impediments to Fair Housing.

This Analysis to Impediments to Fair Housing (AI) covers the City of Gastonia and the Gaston Consortium area which includes the unincorporated areas of Gaston County and all the cities included in the 2005 & 2010 Consolidated Plan. This Analysis of Impediments to Fair Housing is an exploration of many housing and housing-related policies and practices in use throughout the Gastonia/Gastonia Consortium area that may inadvertently or deliberately prevent people from living where they choose. The analysis is not a fair housing plan for the jurisdiction; rather, it is a tool to assist in the development of the Annual Action Plan for fair housing activities. The analysis is also intended as an educational tool for housing planners, policymakers, housing providers, and other stakeholders in the community.

The Analysis was completed according to Affirmatively Furthering Fair Housing (AFFH) under Section 808 of the Fair Housing Act, Department of Housing and Urban Development (HUD). According to HUD, the AFFH obligation requires each jurisdiction to:

1. Conduct an analysis to identify impediments to fair housing choice within the jurisdiction;
2. Take appropriate actions to overcome the effects of any impediments identified through the analysis; and
3. Maintain records reflecting the analysis and actions in this regard.

The Analysis of Impediments to Fair Housing was updated by the City of Gastonia's Community Development Division from an original analysis conducted by the University of North Carolina at Charlotte, Department of Geography and Earth Science in cooperation with the City of Gastonia's Community Development Office and an updated version in September 1, 2002. Information from the City of Gastonia, City Vision 2020, Gastonia's Comprehensive Plan, Gastonia's professional staff, local banking institutions, the Gastonia Public Housing Authority, local realtors, and private organizations was used to prepare this Analysis.

## II. ACTIVITIES UTILIZING CDBG AND HOME FUNDS TO “AFFIRMATIVELY FURTHER FAIR HOUSING”

The City of Gastonia and the Gaston Consortium affirmatively supports Fair Housing and is committed to its funding and actions to help persons overcome barriers to their housing choice. The 2005 Consolidated Plan indicates a number of activities that support fair housing and housing choice for low- and moderate-income households.

### Fair Housing Ordinance

The City of Gastonia adopted a Fair Housing Ordinance in 1982. The ordinance was updated in 1988, 1991 and 2002. The ordinance makes it illegal to discriminate in any way in relation to housing including the sale, purchase, rental of housing, in real estate transactions, or in the provision of brokerage services. The provisions of the ordinance include procedures for fair housing complaints and subsequent proceedings.

### Fair Housing Officer

The City of Gastonia, through CDBG Public Service Funds, provides a staff person to act as the Fair Housing Officer for the City. This program advertises in the local newspapers as well as the local cable government access channel to provide homebuyers, homeowners or renters an opportunity to report fair housing discrimination.

### Fair Housing Hotline

A Fair Housing “hotline”, funded through CDBG funds, has been set-up for verbal complaints. The Fair Housing hotline registers between 25 & 35 calls per year. Statistics show that only two or three of the calls may be cases of discrimination. Most often the caller does not understand the difference between “unfair” and Fair Housing laws. Not all “unfair” practices by a landlord or someone else involved in a housing-related transaction with a consumer are covered by the Fair Housing Act. For example, a landlord that fails to make repairs may be acting “unfairly” but he/she is not in violation of the Fair Housing Act unless his actions (or failure to act) is discriminatory based upon race, color, national origin, gender, religion, disability or familial status.

### Homeownership

The City of Gastonia’s Homeownership Program, funded through the HOME Investment Trust Fund, has been in operation since 1996. The program assists low-and moderate-income families and individuals with the purchase of a home by providing down payment and closing cost assistance in order to make homeownership more affordable while providing an opportunity for housing choice. The program has reduced home purchasing expenses through foregone or waived fees, including mortgage protection insurance, of more than \$3 million.

### Tenant-Based Rental Assistance & Security Deposit Only Program

Through HOME funds, tenant-based rental assistance has been effective in providing housing to homeless individuals and families with an adult member who is disabled and on limited income. The security deposit program assists homeless and those under living in substandard housing to relocate to housing units of their choice that are affordable.

### Community Development Programs

The City of Gastonia, through federally funded entitlement programs, actively engages in the practice of non-discrimination for all of its Community Development Programs.

Program assistance is based upon need and focuses 100% on households at or below 80% of area median income.

### Public Services

The City of Gastonia and the Gastonia Housing Authority, in collaboration with Socialserve.com, provides a website (www.socialserve.com) with an affordable housing database. Housing Choice Vouchers and other affordable housing landlords may list available rental housing units in Gaston County free of charge. Units must be at or below Fair Market Rents established by the U.S. Dept. of HUD each year. The Gastonia Housing Authority, in partnership with the City of Gastonia, provides computer access to the website in their administrative lobby for families or individuals that have Housing Choice vouchers. The website is a positive tool in assisting Housing Choice Voucher holders to find affordable housing quickly. The website provides lower income people with more housing choices. The site is provided at no cost by Socialserve.com because the City of Gastonia was one of the original sponsors in the initial development of the site.

### **III. Fair Housing Complaint Profile and Resolution of Complaints**

Existence of discriminatory practices is documented by the review of complaint-based enforcement activity by government agencies charged with enforcing fair housing laws. Data relating to complaints filed and processed the most recent two-year period (Fiscal Years 2008 - 2009) by the local, state and federal offices charged with investigating fair housing complaints were reviewed for this analysis.

Protected class members from Gaston County have filed complaints alleging housing discrimination. Locally, the Fair Housing Officer receives approximately 25 - 35 calls each year. Of the calls, two or three are referred to the state Human Relations Commission, which is charged with enforcing fair housing laws. Other calls are primarily code enforcement or credit-related issues that are not subject to the fair housing laws.

The Human Relations Commission for the State of North Carolina provides resolution of all fair housing complaints referred to them. In the most recent two-year period, only about 60% of the complaints received were subject to the fair housing laws.

The North Carolina Real Estate Commission, which regulates the real estate industry in the purchase and sell of housing in the state, reports that incidents with housing discrimination are documented only by individual realtor not by County. Based upon their analysis, they cannot document any cases of housing discrimination complaints.

The U. S. Department of Housing and Urban Development (HUD), North Carolina State Office, is the federal agency charged with the enforcement of housing discrimination. According to their records, no calls concerning housing discrimination have resulted in actual fair housing violations during the two-year period of review for this analysis. Currently, the U.S. Dept. of HUD is placing a greater emphasis on fair housing related to projects receiving funding through their governmental departments.

Complaint-based enforcement activity has its limitations and may not be a complete indicator of the extent of discrimination in the housing market. It is possible that many people do not

file complaints due to lack of knowledge of the law, from fear of humiliation or a perceived idea that agencies may not be responsive to the issue.

The information received for the analysis of impediments makes it clear that, while efforts of governmental enforcement agencies are important, added resources such as Fair Housing Testing Activities could increase the effectiveness of addressing any fair housing violations. Fair Housing Testing Activities involves matching testers who appears equal in all respects except for race or gender or other factor being tested. After each tester documents the details of an encounter with a lender, the two experiences are compared for equal treatment and for offer of the same or different products or services.

#### **IV. The Relationship Between Fair Housing and Affordable Housing**

As stated in the Introduction, fair housing choice means access to housing free from discrimination based upon one's race, color, national origin, gender, religion, handicap, or familial status. Persons who are protected from discrimination by fair housing laws are often referred to as "protected class members." Housing discrimination occurs at all income levels, and studies continue to document that even people with high incomes may be discriminated against when trying to rent or purchase a home.

The Analysis of Impediments (AI) explores a range of fair housing issues unrelated to a person's level of income such as discrimination encountered when renting an apartment or buying a home. But to the extent that protected class members tend to have lower incomes than the population as a whole, access to affordable housing (both rental and homeownership) overlaps with fair housing.

There is a significant correlation between fair housing and affordable housing, although they are not identical. The affordability, size and location of available housing impacts significantly on the ability of protected class members to access housing throughout the Gaston County area.

##### **Definition of Fair Housing**

Under the federal Fair Housing Act (FHA), discrimination in the sale or rental of housing, or in the creation and implementation of housing policies and programs, on the basis of race, color, national origin, gender, religion, disability or familial status is illegal. Fair housing means access to housing that is unrestricted by discrimination on these grounds.

A violation of fair housing laws may be a direct discrimination or it may be an indirect discrimination, meaning that the action or policy unfairly burdens or results in the segregation of protected class members.

While fair housing laws require that persons refrain from discriminating, a different duty is placed on governments involved in housing. Under Section 3608 of the FHA, federal, state and local agencies/governments are required not only to refrain from discrimination, but they must also take steps to advance the goals of fair housing. These policies are intended to put a

stop to discrimination and to promote the integration of protected class members throughout the community.

According to HUD's *Fair Housing Planning Guide*, the duty of the jurisdictions to affirmatively further fair housing includes responsibilities to:

- *Analyze and eliminate housing discrimination in the jurisdiction.*
- *Promote fair housing choice for all persons.*
- *Provide opportunities for inclusive patterns of housing occupancy regardless of race, color, religion, sex, familial status, disability or national origin.*
- *Promote housing that is structurally accessible to, and usable by, all persons, particularly persons with disabilities.*
- *Foster compliance with the nondiscrimination provisions of the Fair Housing Act*

Furthermore, the Planning Guide makes clear this duty is not restricted to those public programs that receive federal money through HUD; the obligation “*applies to all housing and housing-related activities in the grantee’s jurisdictional area whether publicly or privately funded.*”

**Definition of Affordable Housing**

“Affordable housing” commonly refers to housing that is affordable to households with lower incomes. According to HUD, housing is affordable when all housing costs (rent, mortgage, utilities, property taxes, and insurance) do not exceed 30% of total household income. This 30% of income standard applies to any person or household regardless of their source or level of income. Households paying more than 30% of their income on housing are said to have a “housing-cost burden”.

HUD uses four different terms to define income levels:

1. Middle income - households earning 80%-120% of Area Median Gross Income (AMGI)
2. Moderate income – households earning 50%-80% of AMGI
3. Low income – households earning 30%-50% of AMGI
4. Very low income – households earning 30% or less of AMGI

For consistent reporting purposes in this AI, 2008 Data from the U. S. Bureau of Census shall be used to assess the region. One hundred percent data has been used when available, sample data when 100% data has not been available. In 2008, the Gaston County Median Household Income was \$44,791. Using this figure, income levels are categorized below according to HUD’s definition. In addition, the percentage of households that fall within these income categories is indicated in order to appropriately identify the percentage of population that may experience a housing-cost burden in Gaston County.

**TABLE 1: Gaston County Area Median Household Income, U.S. Census Bureau, 2008**

<b>INCOME LEVEL BY HUD CATEGORY</b>	<b>Income Minimum / Maximum by Category</b>	<b>Percentage of Households</b>	<b>HUD’s 30% Maximum Housing-Cost Burden</b>
Above Middle Income (120%+)	\$50,000 and above	44.7%	\$1,250 or more
Middle Income (80%-120%)	\$35,000 - \$49,999	15.8%	\$875 - \$1,250
Moderate Income (50%-80%)	\$25,000 – \$34,999	12.1%	\$625 - \$875
Low Income (30%-50%)	\$14,999 - \$24,999	12.9%	\$375 - \$625
Very Low Income (0%-30%)	\$ 0 - \$14,999	6.1%	0 - \$375

While spending 30% of one's income on housing is the desired benchmark set by HUD, hundreds of low- and moderate-income households in Gaston County spend more than this amount. Table 3 provides the market rental rates for 13 comparable rental units (including Section 8) from a Housing Market Study conducted by MLM Consulting in January 2010 for the City of Gastonia. In order to appropriately calculate housing cost included is an additional column to adjust the rates for utilities.

**TABLE 2: Housing Market Study, Jan. – Feb. 2010 MLM Consulting for the City of Gastonia**

Unit Type	Average Rent	Housing Cost (Rent + Utilities)
1 Bedroom / 1 Bath	\$442	\$530
2 Bedroom / 1-2 Bath	\$517	\$620
3 Bedroom / 1-2 Bath	\$610	\$732

Based upon the Rental Housing Cost in Table 3 and statistical data from the U.S. Bureau of Census (American Fact Finders 2006-2008) Gaston County renter households that experience a housing-cost burden are estimated to be 53.4%, up from 28% from the previous AI. Likewise, 48.1% of homeowners experience a housing cost burden. The information indicates that a large number of households are in need of more affordable housing.

### **Interrelationship of Fair Housing and Affordable Housing**

As stated, fair housing and affordable housing are interrelated. While fair housing protections transcend income, it is often protected class members (people of color, people with disabilities, women, large families, new immigrants) that earn less than the population as a whole. They often experience a greater housing-cost burden, fewer housing choices and a greater likelihood of fair housing discrimination. The following tables represent the disparity in income of protected class members as it interrelates to affordable housing.

**TABLE 3: Comparative of Household Income to Median earnings for male vs. female worker, U.S. Census 2008**

Full-time, Year-round worker	2008 Median earnings	Comparison to HHI as %
<b>Median Household Income (HHI)</b>	<b>\$ 44,791</b>	<b>100%</b>
Male Worker	\$ 41,519	69%
Female Worker	\$ 31,715	31%

**TABLE 4: Median Household Income by Race, U.S. Census 2000 (2008 data not available)**

Race	Median Household Income	%
<b>Gaston County Median Household Income</b>	<b>\$39,482</b>	<b>100.0%</b>
White	\$41,130	104.2%
African American or Black	\$28,474	72.1%
American Indian & Alaska Native	\$32,222	81.6%
Asian	\$48,611	123.1%
Hawaiian and Pacific Islander	\$35,714	90.4%
Other Race	\$28,974	73.4%
Two or More Races	\$35,517	90.0%
Hispanic or Latino	\$34,833	88.2%

According to the U.S. Census figures listed in the tables above, a male worker in Gaston County earns 69% of the median household income versus a female worker that earns only 31%. Likewise, white households earn 13% to 31% more than all other races except Asian.

In order for Gastonia and the Gaston Consortium to further the goals of fair housing, affordable housing must be a priority to ensure housing choice for all citizens.

## V. Jurisdictional Profile & Data

In order to provide an analysis of impediments to fair housing, it is important to review the background of the jurisdiction in order to analyze trends that may create impediments in an area or region. For comparison purposes, information is provided on Gaston County and its similarities and differences to a number of surrounding counties in the Metro Region.

### General Information Data

The 2006-2008 Census provides the following information about Gaston County:

- The population of Gaston County is 202,141.
- The racial composition of Gaston County includes:

White	80.0%
Black or African American	14.9%
American Indian or Alaska Native	.7%
Asian	1.2%
Native Hawaiian/Pacific Islanders	.1%
Other race	2.5%
Two or More Races	1.1%
Additional information:	
Persons of Hispanic or Latino Origin	5.4%
- The Median Household Income is \$44,791 (2008 Income).
- Gaston County contains 87,227 housing units of which 76,632 are occupied. Of the units occupied:
  - 70.6% are owner-occupied
  - 29.4% are renter-occupied
- The homeowner vacancy rate is 12.1%.
- The average household size of occupied units is 2.6%. The average family size of renter-occupied units is 3.14%.
- More than 46% of the housing units in Gaston County are pre-1970.
- The Gaston County labor force numbered 158,847 persons with current unemployment at 7.9%. Private wage / salary workers or self-employed people make up 92.1% of the work force. The major industries in Gaston County are Manufacturing at 18.7% and Educational Service, Health Care and Social Assistance at 19.6%.

### Setting

The physical and environmental setting affects the pattern of settlement; where we work, where we live, and where we play. Geographically situated in the heart of the Piedmont, the Charlotte-Gastonia-Concord MSA is the largest urban region between Atlanta and Washington, D.C. Gaston County itself covers 356 square miles according to the U. S. Bureau of Census 2000 Data. The hilly terrain, abundance of streams, and red clay soil physically distinguish the region from the surrounding areas. The Piedmont contains both densely settled urban regions and sparsely settled rural areas.

On a smaller scale, the City of Gastonia is the center of a sub-region consisting of Gaston, Lincoln, Cleveland, and northern York counties. Gastonia acts as an employment and retailing nucleus as well as a transportation hub. However, Charlotte is the dominant city in the area and Gastonia gravitates toward greater integration with the Charlotte region.

**Income**

Income in comparison to race has been discussed in the previous section. However, income for Gaston County households vs. income for other areas in the region is an important factor when determining needs of a community. Listed in Table 6 are the Area Median Household Incomes according to the 2006-2008 U. S. Census. A household includes all the persons who occupy a house, an apartment, a mobile home, a group of rooms, or a single room. The occupants may be a single family, one person living alone, two or more families living together, or any other group of related or unrelated persons who share living arrangements. According to Table 6, Gaston County has maintained its income growth in comparison with the region; however, its income remains lower than other Counties in the region except Catawba and Cleveland Counties. This lower income per household identifies the need for more job skills and higher paying jobs in Gaston County.

**TABLE 5: Median Area Household Income, U. S. Census, 2007**

<b>HOUSEHD INCOME</b>	<b>Cabarrus</b>	<b>Catawba</b>	<b>Cleveland</b>	<b>Gaston</b>	<b>Lincoln</b>	<b>Mecklenburg</b>	<b>Union</b>
<b>2000</b>	\$46,140	\$40,536	\$35,283	<b>\$39,482</b>	\$41,421	\$50,579	\$50,638
<b>2007</b>	\$51,927	\$43,618	\$37,411	<b>\$44,791</b>	\$49,250	\$56,114	\$60,612
<b>Increase %</b>	13%	8%	6%	<b>13%</b>	19%	11%	20%

**Housing**

The suburbanization of metropolitan areas continues as cities spread into the hinterlands. This trend of development at the fringe includes housing, retail, offices, and industry. Interestingly, the increasing acceptance of high quality, high-density residential development in the Charlotte Metro region is a departure from national norms.

Homeownership is a national trend endorsed and encouraged by the federal government and reflects market trends evident in the region. However, Gaston County’s homeownership rate of 70.6% (U. S. Bureau of Census, Housing Characteristics, 2008) is slightly up from the 2000 census of 68.8%. Of the 87,227 housing units in Gaston County, 76,632 are occupied. Homeowner vacancy rate is 4.8% whereas rental vacancy rate is 11.6%.

Affordable housing, that is housing which is within market reach for very low, low – and moderate income households, is often occupied by the same “protected class members” as stated in the Fair Housing Act. Therefore, we will review the demand for affordable housing that may correlate with limited housing choice.

**Housing Demand for Homeownership and Rental Units**

Gastonia and Gaston County’s housing market has been greatly affected by the economic decline and financial market crisis. Homeownership exceeds the current need for additional housing construction.

Review of 13 comparable rental housing complexes from the 2010 Housing Market Survey by MLM Consulting prepared for The City of Gastonia, vacancy rates ran as high as 25%. Rental units with lower vacancy rates had actually lowered their rent from a market study five years previous.

Current review of rental conditions with the local public housing authorities indicates that the need for subsidized housing parallels the economic downturn with waiting lists of two or more years for Housing Choice Vouchers and six months to one year for public housing

Unlike other areas of the nation, median housing values have increased. The economic downturn has not significantly affected housing values For comparative purposes, Table 7 shows the housing values for some counties in the region.

**TABLE 6: Median Value of Owner-Occupied Housing Units, U. S. Census 2008**

VALUE	Cabarrus	Catawba	Cleveland	Gaston	Lincoln	Mecklenburg	Union
2000	\$118,200	\$103,000	\$83,200	<b>\$90,300</b>	\$104,500	\$141,800	\$128,500
2008	\$172,700	\$132,300	\$100,300	<b>\$114,000</b>	\$129,000	\$200,900	\$184,600
Increase %	46%	28%	21%	<b>26%</b>	23%	42%	44%

Gaston County has a median housing value of \$114,000. In the Metro region, Cleveland County is the only county with a lower median housing value. Other than Cleveland County, Gaston County’s housing value has the lowest rate of appreciation in the region. This can be accounted for by the large percentage of aging housing in Gaston versus other counties in the region. Aging housing stock affects property tax values and results in lower revenues for local government. Table 8 below provides information on the percentage of housing units that are Pre-1970.

**TABLE 7: Selected Housing Characteristics-Year Structure Built, U.S. Census, 2008**

HOUSIN G	Cabarrus	Catawba	Cleveland	Gaston	Lincoln	Mecklenburg	Union
Pre-1970	21004	21041	15995	<b>35073</b>	8755	94712	11657
Post-1970	48250	46420	26868	<b>52154</b>	22065	310543	55317

**Population**

Any community is a reflection of the people who live and work in it. The study of population is fundamental to understanding and planning for the future needs of the community. Population changes dictate the location and type of new housing required, whether the community needs more schools, or whether more services for senior citizens are necessary. Other services such as police and fire protection need to grow as population grows. By knowing about population change, officials in Gastonia/Gaston County can tailor their

community development efforts and social services to the areas that need them most. Table 10 shows the population changes in the Metro Region.

**TABLE 8: Population Growth Comparisons, U. S. Census 2000 & 2008**

Population	Cabarrus	Catawba	Cleveland	Gaston	Lincoln	Mecklenburg	Union	Region
2000	131,063	141,685	96,287	<b>190,365</b>	63,780	695,454	123,677	1,442,311
2008	168,740	157,079	99,015	<b>206,679</b>	74,746	890,515	193,255	1,790,029
% increase	29%	11%	3%	<b>9%</b>	17%	28%	56%	24%

As the figure indicates, the Metro region, as well as all of the nearby counties except Cleveland County to the west, is experiencing a more rapid growth rate than Gaston County. One possible explanation lies in the directional growth of Charlotte over the same period. The rapid expansion of Charlotte toward the Northeast, South, and Southeast coupled with relatively little growth toward the West partially clarifies the slower growth in the county.

It is important to know how many people live in an area, but it is equally important to know where those people live. The region has excellent potential for urban development. In fact, one of the distinctive features of the area is countryside replete with numerous towns and small settlements. Thus, the Metro region is both rural and dense. This pattern repeats in the development of the area's larger cities. Clusters of cities characterize the urban portions of the region rather than one large city and a surrounding hinterland. Nationally, a movement of the population away from rural areas to the cities is evident. The Metro region displays a similar trend. Some counties exhibit very large growth from rural to urban. Gaston County shows a modest increase in the number of people living in urban areas. Table 11 shows the population shifts between rural and urban areas from 1980 to 2000. (2008 data unavailable.)

**TABLE 9: Urban and Rural Population Shares, U.S. Census 1980-2000**

Urban & Rural Populations		Cabarrus	Catawba	Cleveland	Gaston	Lincoln	Mecklenburg	Union
1980	Urban	62.7	56.0	28.5	<b>69.3</b>	11.4	87.5	21.7
%	Rural	37.3	44.0	71.5	<b>30.7</b>	88.6	12.5	78.3
1990	Urban	59.5	59.5	26.8	<b>69.7</b>	13.6	90.1	35.7
%	Rural	40.5	40.5	73.2	<b>30.3</b>	86.4	9.9	64.3
2000	Urban	72.4	64.9	44.5	<b>77.5</b>	37.9	96.2	50.1
%	Rural	27.6	35.1	55.5	<b>22.5</b>	62.1	3.8	49.9
% Change Rural to Urban		15.5	15.9	56.1	<b>11.8</b>	232.5	9.9	130.9

The above table indicates that Gaston County has the slowest rate of change from rural to urban other than Mecklenburg, which has been almost exclusively urban for some time. The Census defines an urban population as comprising all persons living in (1) places of 2,500 or more inhabitants incorporated as cities, villages, boroughs, and towns, but excluding those persons living in the rural portions of extended cities (2) census designated places of 2,500 or more inhabitants, and (3) other incorporated or unincorporated territory included in the urbanized areas. An urbanized area comprises one or more places and the adjacent densely settled surrounding territory that together has a minimum population of 50,000 persons.

Race and gender deserve attention in a complete population study. For example, Fair Housing efforts and political redistricting are at least partially based on race. Gender percentages of Gaston County residents do not vary significantly from the other counties in the region as listed in Table 12. Race is also within the same ratios as other counties except for Mecklenburg, which has a significantly larger minority population according to Table 13.

TABLE 10. Population by Sex, U. S. Census, 2006-08 American Fact Finders

Population	Cabarrus	Catawba	Cleveland	Gaston	Lincoln	Mecklenburg	Union
<b>TOTAL</b>	<b>162,223</b>	<b>154,950</b>	<b>98,276</b>	<b>202,141</b>	<b>72,826</b>	<b>862,131</b>	<b>182,966</b>
Male	79,520	76,231	47,143	97,660	36,077	423,582	91,152
Female	82,703	78,719	51,133	104,481	36,749	438,549	91,814

TABLE 11: Population by Race, U. S. Census, 2008

POPULATION	Cabarrus	Catawba	Cleveland	Gaston	Lincoln	Mecklenburg	Union
<b>TOTAL</b>	<b>162,223</b>	<b>154,950</b>	<b>98,276</b>	<b>202,141</b>	<b>72,752</b>	<b>828,509</b>	<b>182,966</b>
White	129,849	126,795	75,060	160,531	63032	520,892	149,440
Black or African-American	23,273	12,416	20,179	28,618	4308	252,281	22,258
American Indian or Alaska Native	273	807	292	815	203	3301	669
Asian	2471	4290	848	2076	227	33654	2386
Native Hawaiian or Other Pacific Islander	422	26	0	133	0	773	0
Some other race alone	3396	8240	1298	7346	3804	3735	6113
Two or more races	2539	2376	599	2622	1178	13873	2100
<b>OF RACES ABOVE, which include Hispanic or Latino</b>				<b>10,837</b>			
Percentage of Minorities	14%	8%	21%	20%	6%	30%	12%

The sizes of households and families have an impact on the location, type, and amount of housing needed in the community. The Census Bureau defines a “family” as any household of two or more people living together and related by birth, marriage, or adoption. Based upon the latest 2008 Census, 69.4% of the households in Gaston County are families; 26.7% are one-person households and 3.9% are non-family households with two or more persons. This mix of families vs. singles and non-related households indicate no pattern of change in the last ten years; therefore, new emerging trends for housing are not indicated.

Of the family households in Gaston County, 28.8% are single parent households with almost three-fourths female head. Single parent head households have increased from ten years ago; up from 22.8%. Most of this increase is in single female heads. However, **females** usually earn less than men; therefore, these families may have lower incomes than their male counterpart and certainly less than the traditional two parent families.

### Education

The educational level of a population can highlight the need for more job training and more adult literacy programs. The residents of Gaston County exhibit the highest percentage of population with no high school diploma or equivalent and rank near the bottom in college level or above in educational attainment. Table 13 gives a comparison of educational attainment levels of the population age 25 or older in the region. In as much as education and income are so highly correlated, future earnings potential for residents of Gaston County are below the Metro region. It is extremely difficult to improve the economic circumstances of an individual or family with minimal education.

TABLE 12: Highest Educational Attainment Level Comparison to % of Population Age 25+, U. S. Census, 2008

COUNTY	No High School Diploma	High School Diploma	Some College or Associate Degree	Bachelor Degree	Master, Professional or Doctorate Degree
Mecklenburg	11.1%	20.7%	27.9%	27.7%	12.7%
Union	15.5%	28.6%	29.1%	19.9%	6.8%
Cabarrus	15.4%	29.4%	32.7%	16.1%	6.4%

<b>Gaston</b>	<b>22.2%</b>	<b>30.6%</b>	<b>29.3%</b>	<b>12.3%</b>	<b>5.6%</b>
<b>Lincoln</b>	<b>24.8%</b>	<b>30.4%</b>	<b>28%</b>	<b>12.2%</b>	<b>4.6%</b>
<b>Catawba</b>	<b>20.4%</b>	<b>32.8%</b>	<b>27.8%</b>	<b>13.2%</b>	<b>5.8%</b>
<b>Cleveland</b>	<b>22.4%</b>	<b>33.7%</b>	<b>29%</b>	<b>10.1%</b>	<b>4.8%</b>

### Employment

The dominant economic characteristic of the Metro region pertains to the pattern of manufacturing and non-manufacturing employment. Charlotte is the center of the region in population, cultural facilities, education, and non-manufacturing employment. The counties surrounding Mecklenburg, particularly Catawba, Cleveland, Gaston, and Lincoln, have the largest concentration of manufacturing. This pattern of employment steered geographers and statisticians to recognize the cohesive nature of the region. Textiles, apparel, and related industries dominate the manufacturing sector of the economy. Gaston County continues to be vulnerable to the textile industry with jobs moving to foreign soil. However, as industrial diversification increases, the health of the area's economy may also increase. Table 15 illustrates the difference between the manufacturing belt and the non-manufacturing core of the region.

TABLE 13: Percent of Industry Comparison by County, U. S. Census, 2000 or 2008

<b>INDUSTRY JOBS BY COUNTY</b>	<b>Cabarrus</b>	<b>Catawba</b>	<b>Cleveland</b>	<b>Gaston</b>	<b>Lincoln</b>	<b>Mecklenburg</b>	<b>Union</b>
<b>Agriculture</b>	.6	.6	1.4	.4	.8	.2	.6
<b>Construction</b>	10.3	6.2	7.1	8.7	8.8	8.3	12.3
<b>Education &amp; Health</b>	19.5	19.4	24.9	19.6	17.1	18.0	16.8
<b>Other</b>	18.1	11.9	12.9	16.1	14.7	24.2	18.8
<b>Manufacturing</b>	10.9	26	22.2	18.7	22.5	7.7	13.0
<b>Professional &amp; Office</b>	9	6.3	4.6	7.3	6.9	12.2	9.1
<b>Services-Retail, Recreation, Food</b>	25.8	24.1	20.8	22.7	22.5	23.6	25.6
<b>Transportation &amp; Utilities</b>	5.7	5.4	6.2	6.4	6.6	5.7	3.7

Charlotte is unique among large cities because it does not have a large manufacturing sector within the city. The manufacturing belt surrounding the city forms an essential part of the regional economic engine. Gastonia's population has increased in white-collar jobs; however, many of these jobs are in Mecklenburg County where the population commutes.

### Local Conditions

Gastonia is at the heart of one of the fastest growing regions in the United States. As jobs, capital, and people move toward the sunbelt, Gastonia has the opportunity to take advantage of the economic opportunities. An integral part of the Charlotte region, the city is a partner in the region's housing and job markets. It is also a competitor within the region, seeking a fair share of good jobs and high quality development. Gastonia has almost every service and amenity in the county, including retail trade, medical facilities, and new county government facilities. Essentially, Gastonia is the economic, governmental, and population center of Gaston County.

Gastonia is not growing in a geographically balanced fashion. The regional job market and rapid growth of amenities in the area fuel the economic boom on the East side of the city. Interestingly, school district assignment also dramatically affects the demand for housing, especially single family housing. Houses of similar size and features have vastly different

market appeal based on the perceived quality of the local school. These factors only magnify the social distance between the two sides of the city. Stagnation characterizes the West side. It has an aging population, few shopping opportunities or other amenities and an increasing number of people in poverty. Furthermore, the West side of the city has more than its fair share of low-income housing. In fact, CD discourages large (more than twenty-five units) low-income housing projects in certain census tracts on the West side. CD prefers scattered site affordable housing. A local zoning ordinance enforces a maximum number of 50 low-income housing units in certain census tracts unless they are for special needs populations.

The older part of Gastonia, including the downtown, the surrounding neighborhoods, and the outlying mill villages all exhibit signs of decline. However, with some investment in the downtown area, new housing and retail business are emerging. Minimal investments in housing, commerce, and services threaten older neighborhoods throughout the city. These neighborhoods present a challenge entirely different from fast-growing suburban areas.

## **VI. Areas for Potential Discriminatory Practices & Identification of Impediments**

### **Sale of New & Existing Housing**

Realtors play an important role in encouraging fair housing choice. Historically, blockbusting and steering were techniques commonly used by realtors nationwide to prevent segregation of neighborhoods. Today, local realtors have increased knowledge of fair housing laws and work to uphold a code of ethics by the realtors association that includes the ban of any discriminatory practice. Realtors who join the local association receive specific training in a professional code of ethics.

As stated in Section III of this report, there have been no documented cases of fair housing complaints filed against real estate agencies in Gaston County in the two-year period of June 2007-2009. In addition, there have been no reported complaints to the local realtors association. Although impediments in the actual sale process may exist, the greatest disparity is found in the loan process, which shall be addressed separately in this section.

### **Aged Housing Stock**

Aged Housing Stock has been identified as a problem in Gaston County with 46.4% of the housing stock that is pre-1970. Being of textile dominance, Gaston County's many older houses are what have been commonly termed "mill houses". Textile manufacturing plants, or mills, often provided housing for their workers. When textile manufacturers discontinued the housing options for workers, most of the units were sold. Many are now owned by the elderly population or have become rental housing. With this aged housing stock, issues such as maintenance and lead-based paint become primary concerns. These lower-end rental units house some of the same people that are protected class members under Fair Housing laws. These lower-end rental units are scattered among many parts of the county near primary jobs in manufacturing. The City of Gastonia has a number of programs that assist low-income homeowners with rehabilitation or emergency repairs of older housing stock both inside and outside of the city limits as well as an investor loan program for landlords of rental housing. With this older housing stock, lead-based paint becomes an issue, particularly for families with young children; therefore it is considered an impediment to fair housing because it limits housing choice for these families.

### **Rental Housing**

Housing units in Gaston County are 29.4% renter occupied. Historically, rental housing can be an area of deliberate discrimination by owners refusing to rent to a minority, a single mother or a disabled person. Landlords of rental housing may use tenant selection policies that result in discriminatory practices for protected class members through restrictive occupancy standards, refusal to accept government funded rental subsidies, minimum income standards and tenant screening reports. Although no housing discrimination complaints are recorded other than those mentioned in Section III of this report, housing discrimination may exist by private landlords that go unreported because of failure of protected class members to understand fair housing laws.

### **Public Housing & Housing Choice Vouchers**

Public Housing Authorities (PHAs) play an important role in furthering fair housing by developing, implementing, and evaluating policies and procedures that promote greater housing choice. Fair Housing Marketing Plans are important to ensure inclusion of all protected class members.

Public housing for the City of Gastonia is located in the west and northwest areas of the city in predominately African-American/Black neighborhoods thereby limiting housing choice for some renters. No new public housing has been built or acquired since 1971 and no new public housing is being planned by Gastonia. In order to further fair housing choice, the Gastonia Housing Authority (GHA) works to expand Housing Choice Vouchers housing in the county. To do this, GHA actively seeks landlords from all sections of the county. Additionally, GHA holds monthly landlord meetings to provide education on tenant screening, maintenance, free website listing and housing regulations in order to provide landlords the tools needed to be successful Section 8 landlords with successful tenants. Despite these efforts, in the last three years Section 8 housing has decreased from 1,174 units to 1,073 units, a loss of 101 units. This is due in part to more strict maintenance standards implemented by the Gastonia Housing Authority in order to eliminate any substandard rental housing.

The Belmont Housing Authority has 50 units of public housing located in the southeast portion of the city. Currently reviewing its Five-Year Plan, the Belmont Housing Authority is considering additional housing based on need. This housing may be in the form of additional public housing or Housing Choice Vouchers.

In analyzing the information provided by the public housing authorities in Gaston County, there is a lack of marketing offered which ensures that all protected class members have housing choices through the authorities. Additionally, language barriers may exist for persons with Limited English Proficiency (LEP) due to on-site language proficiency or standard procedures that would assist these applicants.

### **Advertising & Marketing Policies**

Advertising in a manner that limits the type of tenant a landlord may accept can be a means of indirect discrimination. There were no specific phrases identified in the advertising section of local newspapers that would indicate housing discrimination. None of the ads reviewed indicated whether the unit had accessibility features for persons with disabilities. This can make it a very difficult and frustrating process for persons with disabilities to look for housing. Although no deliberate discrimination may exist within these ads, exclusions may exist which could be considered an impediment to fair housing choice.

Lack of knowledge of available services in a community may hinder protected class members from housing choice. Marketing plans do not always target lower income families or individuals especially minorities; any of which may tend to be the same as protected classes covered by the Fair Housing Act.

### **Lending**

CRA reports for a two year period from a local lending institutions, BB&T and First National, were reviewed for discrimination of lending practices for protected classes applying for home mortgages. The reports did not indicate any discrimination practices based upon race, color, gender, religion or familial status. Loans were approved based upon ability to pay, job longevity, credit and rental history. Loan rejections did not indicate an unequally high percentage of minorities or single female applicants.

### **Zoning & Land Cost**

Zoning and land cost have historically been issues that often separate classes of people and often becomes an impediment to protected class members by restricting the location of housing. The west side of Gastonia has been overpopulated with lower income rental units. A Gastonia West Committee was formed that brought the issue of this imbalance in affordable rental housing units to the attention of governmental officials. In response, officials placed zoning restrictions with maximum units and census tracts throughout the city in an attempt to balance affordable rental housing. However, land cost on the east side of the city impedes the affordability of rental construction.

### **General Public Attitudes**

Attitudes in a community can reject affordable housing and therefore fair housing choice for many of the protected class members. One of the most frequently cited impediments to fair housing choice nationwide is community and neighborhood opposition to affordable housing, frequently referred to as NIMBY – “Not In My BackYard.” This is not a new issue and Gaston County is no exception to NIMBYism. Neighbors frequently express concern about falling property values, increased crime rates and the safety of their children. Although there are many documented cases of affordable housing blending well with established neighborhoods, lack of education, fear and perception often take precedence in a developing community. Because Gaston County experiences the same perception that affordable housing means crime and unsafe streets, NIMBYism has been identified as an impediment to fair housing choice in this community.

### **Transportation**

Transportation allows a person the means to choose housing in any part of a community. Lack of transportation options limit housing choice for protected class members because they must choose housing that is in close proximity to their jobs, education/training and needed services.

Gastonia has public transportation within its city limits as well as to the local community college. In cooperation with Gastonia, the Charlotte Area Transit System (CATS) has express buses that make daily roundtrip stops in Belmont and Gastonia. This allows people, with limited transportation, access to higher paying jobs in Charlotte. Although Gastonia has been responsive to the needs of its citizens, it is limited to services within the city limits. No other city within the Gaston County municipalities has public transportation.

According to the 2008 Census, 83.6 % of Gaston County workers 16 years of age and over drive alone to work in a car, truck or van. Another 10.7% of workers carpool and .8% walk to work.

Only .4% of workers in Gaston County use public transportation for work. Interestingly, a Community Needs Assessment completed in 1998 by United Way of Gaston County, Inc. identified transportation as the third most critical need in the community. The Assessment states, "buses and taxi services are not available in many areas of Gaston County...Lack of adequate transportation provides hardships on individuals trying to secure and maintain employment, access child care or health services, obtain job skills training and other basic family functions." Today, transportation availability continues to be a dominant issue in Gaston County and an impediment to fair housing choice.

### **Language Barriers**

The face of the Gaston County community is changing. Ten years ago, the population of Gaston County had 3,326 residents five years of age and older that spoke English less than very well. In 2008, this increased to 13,143 residents. The language barriers encountered by non-English speaking people can significantly impact the experience of obtaining housing, whether rental or homeownership. The U. S. Dept. of HUD recently prepared a draft policy guidance reminding state and local units of government that receive HUD funds of their responsibility to review existing procedures for ensuring access to federally-funded housing programs for all persons, including those with Limited English Proficiency (LEP).

In reviewing housing related services in Gaston County there may be a lack of interpreter services as well as printed information in languages other than English. Specific housing and housing related services identified in this search include: public housing, homeownership programs, home repair and rehabilitation, relocation assistance, notices of public meetings pertaining to redevelopment or re-zoning, statements and notices pertaining to property taxes, assessments and utility cut-off notices.

## **VII. Impediments Summary and Recommendations**

### **Conclusion**

The City of Gastonia's Community Development Division provide a number of programs that assist citizens to have housing choices, many that are protected-class members. The programs concentrate on households at 80% or less of area median income. Additionally, Community Development has designed an outreach program for citizens who may be the target of violations in fair housing through its Fair Housing Officer, Fair Housing Hotline and advertisement in the local media outlets. The CD Division should continue to maintain these programs, review their impact on an annual basis and modify as needed to have the greatest positive impact on the community.

The City of Gastonia has made significant strides in language barriers since the last AI and should continue to pursue every avenue to remove this barrier so protected class members have access to services that affect fair housing choices.

A number of impediments have been identified in this analysis. The recommendations below will allow the City of Gastonia to develop plans that will assist protected class members in their accommodation of receiving fair housing.

**Recommendations**

The City of Gastonia's Community Development Division, as the main force available to the City should consider developing and implementing of the following:

1. Work with the City of Gastonia departments to develop an expedited process for construction projects that provide housing for protected class members; of which the majority would be those also requiring affordable housing.
2. City consideration of waiving impact fees for affordable housing that would serve protected class members.
3. Use of conditional use permits to waive some building code requirements, such as two parking spaces for each rental unit where the target population (often a protected class member) would not have income sufficient to support the ownership of a vehicle.
4. Gastonia Planning Department work toward neighborhood developments that include amenities within the neighborhoods such as grocery and small retail so those without transportation would have amenities in close proximity to their housing choice.
5. Elected officials become more knowledgeable of the negative perception of affordable housing and understand the effect of lack of affordable housing on a workforce that leads to greater economic job opportunities.
6. Fund a comprehensive study to review the rules, regulations or development standards and to assess the impact on the supply of affordable housing in general.

- Federal Home Loan Bank of Atlanta under the Affordable Housing Program;
  - N.C. Housing Trust Fund and 400 SHPD Initiative;
  - HUD Continuum of Care funding for Shelter Plus Care (S+C) and Housing First Initiatives;
  - Regional Banks;
  - Faith-based community initiatives and investments;
  - Foundations that provide funds for brick and mortar;
  - Private donations.
3. Establish Leadership Committee to secure lead private and corporate gifts for housing development: Leaders in the public and private sector to initiate private and corporate giving opportunities directed toward housing development. The fund could be managed by an existing foundation such as The Community Foundation of Gaston County. The faith community, business and corporate community, foundations and individuals will be educated on the philanthropic opportunity. Philanthropic gifts would be focused on the one-time expense of housing development.
  4. Fast track the process of plan approvals for housing targeted for very low income individuals and those that will serve disabled and homeless individuals/families: City and county officials develop a process whereby engineering and housing plans are fast tracked through the system when the development is targeted for populations to be served through the Continuum of Care.

### **Economic Stability**

1. Develop formal protocols with key public service providers: Key providers will help to ensure full early access by homeless individuals to all publicly funded benefits and service programs. The key providers include the local office of the Social Security Administration, the State Office of Disability Determination, the local and state offices of the Department of Health and Human Services, the N.C. Employment Security Commission and the Welfare to Work programs.
2. Continue to provide access to service providers on the national SOAR initiative training: The SSI/SSDI Outreach, Access and Recovery (SOAR) Initiative is a national best practice that trains case managers and service workers in the process of assisting a disabled person who is homeless to apply and receive Social Security Administration Disability Benefits quickly in order to stabilize them in housing.
3. Conduct an analysis and develop solutions for the public transportation system that prevents homeless individuals from participating in job opportunities and maintaining employment: There are many job opportunities outside of the City limits of Gastonia so it is imperative that municipalities work together to develop

a mass transit system that addresses the transportation barriers of homeless individuals, as well as our citizens in general, which limit employment opportunities or cause hardship in securing and maintaining employment.

### **Health & Safety**

1. Establish new or expanded services to complement existing services: In order to achieve the overarching goal that untreated health conditions, illnesses and injuries will not longer cause or prolong homelessness in the City of Gastonia, new and expanded services are needed:
  - Temporary and transitional housing to engage chronically homeless into systems of care who initially refuse permanent supportive housing;
  - Increased residential substance abuse treatment for indigent and uninsured persons; and
  - Respite care setting(s) for recuperation of persons without homes after hospital discharge.
  
2. Conduct a comprehensive assessment of health care system capacity and need: The current public health care system often forces people to seek medical assistance in the emergency room causing cost to rise dramatically. Develop a working group that will do a comprehensive assessment and provide written recommendations to the County Commission for expansion of the public health system.
  
3. Conduct a comprehensive assessment of the cost, crime rate and causes of arrests of homeless people that are often seriously mentally ill: Overloading the legal system with chronically homeless persons who are mentally ill is a costly process that will continually repeat itself. Develop a working group that will do a comprehensive assessment and provide written recommendations to the Gastonia City Council that will be more cost effective than repeated offenses.

### **Collection of Accurate Data**

In order to assess effectiveness of the Ten Year Plan goals, all homeless service providers will be encouraged to keep accurate data in a Homeless Management Information System, which is the Carolina Homeless Information Network (CHIN), in the State of North Carolina. Funding sources expect to hold service providers to the highest standards of accountability; therefore, timely and accurate data will ensure continued support, allow the community access to statistical information, document services provided and offer accountability as well as document benchmarks.

## Conclusion

According to the U.S. Interagency Council on Homelessness, the key elements in a successful Ten Year Plan is: Disciplined People, Disciplined Thought, and Disciplined Action. Therefore, the following ten elements are necessary to implement the Ten Year Plan:

1. Political and Community Will;
2. Partnerships;
3. Consumer-Centered Solutions;
4. A Business Plan;
5. Budget Implications;
6. Prevention and Intervention;
7. Innovative Ideas;
8. Implementation Team;
9. Broad Based Resources; and
10. Living Documents.

Many in the planning and work groups discovered a coordinated and collaborative system that has already proven, through statistical data, a reduction in chronic homeless individuals in the City of Gastonia. Implementing and enhancing the goals in this Ten Year Plan requires a concerted effort of the community but will reward resolution of current issues and decrease the community's cost of people living on the streets.

**CITY OF GASTONIA**

***Language Access Plan***

**I. PLAN STATEMENT**

The City of Gastonia has adopted this plan to provide meaningful access to its programs and activities by persons with Limited English Proficiency (LEP). In accordance with Federal guidelines, the City of Gastonia will make reasonable efforts to provide or arrange for free language assistance for its LEP clients, including applicants, recipients and/or persons eligible for Community Development Block Grant, HOME Investment Partnership program funds and other Community Development programs – Federal, State or Local.

The purpose of this Policy and Plan is to ensure compliance with Title VI of the Civil Rights Act of 1964, and other applicable federal and state laws and their implementing regulations with respect to persons with limited English proficiency (LEP). Title VI of the Civil Rights Act of 1964 prohibits discrimination based on the ground of races, color or national origin by any entity receiving federal financial assistance. Administrative methods or procedures, which have the effect of subjecting individuals to discrimination or defeating the objectives of these regulations, are prohibited.

This policy and plan is effective August 16, 2011 for four (4) years.

**II. MEANINGFUL ACCESS: FOUR-FACTOR ANALYSIS**

Meaningful access is free language assistance in accordance with Federal guidelines. The Housing & Neighborhoods (H&N) Division will periodically assess and update this plan using following four-factor analysis:

1. The number or proportion of LEP persons eligible to be served or likely to be encountered by the Housing & Neighborhoods Division.
2. The frequency with which LEP persons using a particular language come into contact with the Housing & Neighborhoods Division.
3. The nature and importance of the H&N program, activity or service to the person's life.

4. The Housing & Neighborhoods Division resources and the cost of providing meaningful access. Reasonable steps may cease to be reasonable where the costs imposed substantially exceed the benefits.

### **III. LANGUAGE ASSISTANCE**

1. A person who does not speak English as their primary language and who has a limited ability to read, write, speak or understand English may be a Limited English Proficient person and may be entitled to language assistance with respect to H&N programs and activities.
2. Language assistance includes interpretation, which means oral or spoken transfer of a message from one language into another language and/or translation, which means the written transfer of a message from one language into another language. The H&N Division will determine when interpretation and/or translation are needed and are reasonable.
3. H&N staff will take reasonable steps to provide the opportunity for meaningful access to LEP clients who have difficulty communicating in English. If a client asks for language assistance and the H&N Division determines that the client is an LEP person and that language assistance is necessary to provide meaningful access, the H&N staff will make reasonable efforts to provide free language assistance. If reasonably possible, the H&N Division will provide the language assistance in the LEP client's preferred language.

The H&N staff has the discretion to determine whether language assistance is needed, and if so, the type of language assistance necessary to provide meaningful access.

The H&N Division will periodically assess client needs for language assistance based on requests for interpreters and/or translation, as well as the literacy skills of the clients.

### **IV. TRANSLATION OF DOCUMENTS**

1. The H&N staff will weigh the cost and benefits of translating documents for potential LEP groups, considering the expense of translating the documents, the barriers to meaningful translation or interpretation of technical housing information, the likelihood of frequent changes in documents, the existence of multiple dialects within a single language group, the apparent literacy rate in a LEP group and other relevant factors. The H&N Division will undertake this examination when an eligible

LEP group constitutes five percent of an eligible client group (for example, five percent of households applying for program assistance).

2. If the H&N Division determines that translation is necessary and appropriate, the H&N staff will arrange to translate the program application and selected mailings and documents of vital importance into that language.
3. The H&N Division will consider technological aids such as Internet-based translation services, which may provide helpful, although perhaps not authoritative, translation of written materials

#### **V. FORMAL INTERPRETERS**

1. When necessary to provide meaningful access for LEP clients, the Housing & Neighborhoods (H&N) office will provide qualified interpreters, including City of Gastonia bilingual staff and contract vendors, if available. At important stages that require one-on-one contact, written translation and verbal interpretation services will be provided consistent with the four-factor analysis used earlier.

To be qualified, the bilingual staff and contract vendors will be screened to ensure that the following standards are met before being used for interpreter services:

- a. Can fluently and effectively communicate in both English and the primary language of the LEP individual.
  - b. Can accurately and impartially interpret to and from such languages and English.
  - c. Has a basic knowledge of specialized terms and concepts used frequently in the provision of the agency's services.
  - d. Demonstrates cultural competency.
  - e. Understands the obligation to maintain confidentiality.
  - f. Understands the roles of interpreters and the ethics associated with being an interpreter.
2. The H&N office may require a formal interpreter to certify to the following:
    - a. The interpreter understood the matter communicated and rendered a competent interpretation.
    - b. The interpreter will not disclose non-public data without written authorization from the client.
  3. Formal interpreters shall be used at the following:
-

- a. Formal hearings concerning Housing & Neighborhoods Grievance Procedures. City staff will not be utilized as interpreters in any instance where such use would constitute a conflict of interest.
- b. If Bilingual City employees not can provide assistance to H&N staff and LEP clients as part of their regular job duties, and the H&N Division determines that no other reasonable option is available.

#### **VI. INFORMAL INTERPRETERS**

1. Informal interpreters may include the family members, friends, legal guardians, service representatives or advocates of the LEP client. H&N staff will determine whether it is appropriate to rely on informal interpreters, depending upon the circumstances and subject matter of the communication. However, in many circumstances, informal interpreters, especially children, are not competent to provide quality and accurate interpretations. There may be issues of confidentiality, competency, or conflict of interest.
2. An LEP person may use an informal interpreter of his or her own choosing and at their expense, either in place of or as a supplement to the free language assistance offered by the H&N office. If possible, the H&N office should accommodate an LEP client's request to use an informal interpreter in place of a formal interpreter.
3. If an LEP client prefers an informal interpreter, after the H&N office has offered free interpreter services, the informal interpreter may interpret. H&N Staff should insure that the LEP person's choice is voluntary, that the LEP person is aware of the possible problems if the preferred interpreter is a minor child and that the LEP person knows that the H&N office will provide a competent interpreter at no cost to the LEP person. In these cases, the client and interpreter should sign a waiver of free interpreter services.
4. If an LEP client wants to use his or her own informal interpreter, the H&N office reserves the right to also have a formal interpreter present.

#### **VII. OUTSIDE RESOURCES**

1. Outside resources may include community volunteers and organizations.
-

2. Outside resources may be used for interpreting services at public or informal meetings or events if a timely request has been made. If community volunteers and organizations are utilized, H&N staff will insure that such outside resources are competent in interpreting and knowledgeable about the applicable confidentiality and impartiality rules.

#### **VIII. MONITORING AND REPORTING**

1. The H&N office staff will complete a self-monitoring report on a quarterly basis using a standardized reporting system and will be provided as needed to funding agencies. The H&N office will review this LEP Plan at a minimum of every four years. The review will include:
  - a. Reports from the Hansen System on the number of clients who are LEP, to the extent that the software and staff data entry can provide such information. Such reports may be supplemented by staff observations.
  - b. Reports from the Hansen System and other sources listing the languages used by LEP clients.
  - c. A determination as to whether five percent from the H&N client group speak a specific language which triggers consideration of document translation needs as described above.
  - d. Analysis of staff requests for contract interpreters: number of requests, languages requested costs, etc.
  - e. The Citizens Advisory Board (CAB) will be asked to review the LEP Plan annually as part of updating the Citizen Participation Plan.
2. The H&N office will complete an annual compliance report and provided it to funding agencies as requested and assist with monitoring of the LEP plan by funding agencies.

#### **IX. Applicant/Recipient Complaints of Discriminatory Treatment**

1. Complaints
    - a. The H&N office will provide assistance to LEP individuals who do not speak or write in English if they indicate that they would like to file a complaint. A complaint will be filed in writing, contain the name and address of the person filing it or his/her designee and briefly describe the alleged violation of this policy.
-

- b. The H&N office will maintain records of any complaints filed, the date of filing, actions taken and resolution.
- c. The H&N staff will notify the appropriate agency of complaints filed, the date of filing, actions taken and resolution. This information will be provided within 30 days of resolution.

2. Resolution of Matters

- a. If the matter cannot be resolved by informal means, then the individual will be informed of his or her right to appeal further to the appropriate funding agency. This notice will be provided in the primary language of the individual with Limited English Proficiency.

**IX. LAP PLAN DISTRIBUTION AND TRAINING**

1. The LAP Plan will be:

- a. Distributed to all H&N staff.
- b. Available at the Housing & Neighborhoods Division Administrative Office at 150 S. York Street, Gastonia, North Carolina – Suite 239.
- c. Posted on the Housing & Neighborhood Division website, [www.cityofgastonia.com](http://www.cityofgastonia.com)
- d. Explained in training sessions for supervisors and other staff who need to communicate with LEP clients, which training sessions will be provided at least annually.

Approved by City Council on August 16, 2011.

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Jennifer T. Stultz, Mayor

ATTEST:

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(Deputy) City Clerk



***CITY OF GASTONIA/  
GASTONIA CONSORTIUM  
CITIZEN PARTICIPATION PLAN***

***December 30, 2009***

***Revised for the  
City of Gastonia  
Community Development Division  
By  
MLM Consulting  
1425 Eastway Drive, Dallas, NC 28034***

# **CITIZEN PARTICIPATION PLAN**

## **December 30, 2009**

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## **EXECUTIVE SUMMARY**

The City of Gastonia/Gaston Consortium Community Development Consolidated Plan is a collaborative process through which the community identifies its housing, homeless, and community development needs. In addition this plan establishes the vision, goals and strategies for addressing the identified needs for five years. Annual Action Plans identify how the money received from the U.S. Department of Housing and Urban Development (HUD) will be spent over the upcoming program year, taking into account the regulations governing the programs, to meet locally identified needs. The Citizen Participation Plan describes the framework and process to be used to develop, implement and assess the City of Gastonia's Community Development programs as required by HUD. The Citizen Participation Plan details the policies and procedures for public involvement in the City of Gastonia Community Development Consolidated Plan development and implementation process.

Citizen participation is a critical part of the Consolidated Plan process. It is the City of Gastonia's desire to encourage all residents, especially those living in low- and moderate-income neighborhoods, to participate in its planning, implementation and assessment process. Non-profit organizations, other government agencies, minorities, disabled citizens, non-English speaking citizens and interested parties have an opportunity to participate as well. To encourage the participation of residents of public and supportive housing developments, these documents and meeting notices shall be distributed directly to public and supportive housing agencies, non-profit and community-based organizations that serve low- and median-income residents as well as homeless residents. Informational and public meetings will be conducted in convenient local facilities in the community, at times and locations convenient to the public, particularly actual and potential beneficiaries.

Citizens participation will include a Citizens Advisory Board; its members appointed by Gastonia City Council and Gaston County Commission. The Citizens Advisory Board members shall serve for two years and by re-appointment for additional two year periods.

Notice of availability of the Consolidated Plan and Annual Plans will be made through advertisements in local newspapers, e-mails, facsimile, public counters, and flyers to local agencies and organizations. The public will be encouraged to review the draft plan and provide comments. The Consolidated Plan, Action Plans, and Annual Performance and Evaluation Reports will be made available in print and electronically and translated versions provided for non-English speaking persons when required. A detailed description of the public participation process for each Plan, Plan amendment, and Performance Report will be included in the final version of each document.

Comments on the Plan may be made in writing, by facsimile or e-mail and addressed to: Administrator, The City of Gastonia, Community Development Division, PO Box 1748, Gastonia, NC 28053-1748; FAX: 704- 866-6067; e-mail:anniet@cityofgastonia.com

## **I. WHAT IS A CITIZEN PARTICIPATION PLAN?**

The Plan is a means of communication by which citizens participate in the planning, implementation and assessment of housing and community development activities as it relates to certain federal, state and other local program funds. Participation allows a beneficial exchange of ideas among citizens, their elected officials and community development staff of the City of Gastonia/Gastonia Consortium. The City of Gastonia is the lead entity for the Gastonia Consortium. The Citizen Participation Plan particularly encourages involvement by low and moderate-income people, especially those living in low- and moderate-income neighborhoods. Low- and moderate income is defined as households with annual incomes of 30% or below area median income (AMI) but not more than 80% of area median income. It is also most appropriate to ensure participation of minorities, people who do not speak English, and people with disabilities.

The City of Gastonia has maintained a Citizen Participation Program since 1978. The program is centered on a Citizens Advisory Board, which is set up in the City Code, Section 3-73. This plan has been revised from the December 20, 2004 edition. This Citizen Participation Plan contains the City of Gastonia/Gastonia Consortium's policies and procedures for public involvement in the Consolidated Plan process and the use of Community Development Block Grant (CDBG) and HOME Investment Trust Fund (HOME) federal funds of which the City of Gastonia/Gastonia Consortium is entitled from HUD. The Consolidated Plan is the basis of eligibility for federally funded entitlement and competitive programs. Because the housing and community development needs of low- and moderate-income people are so great and so diverse, priorities must be set in order to decide which needs should get more attention and more resources than other needs. This is the basic reason the Consolidated Plan exists.

For purposes of this Plan the City of Gastonia shall be referred to as "City" and City of Gastonia Council Members shall be referred to as "Council".

## **II. GOALS OF THE CITIZEN PARTICIPATION PLAN**

The Plan's purpose is to involve citizens in local planning that will improve their communities by providing decent housing, a suitable living environment and growing economic opportunities, all principally for low- and moderate-income people. Specifically:

- A. To provide for continuous involvement of citizens in all aspects of the Community Development program, particularly low- and moderate-income persons, residents of targeted neighborhoods, public housing residents, members of minority groups, disabled individuals and non-English speaking citizens.
- B. To provide a method for citizens to become involve in government planning and to enable them to respond to the needs of its citizens through Community Development programs, policies and plans by encouraging citizens to participate in identification of community development needs and the plans to address those needs.

- C. To ensure citizens are given notice and provided the opportunity to comment on proposals and performance regarding the Community Development programs.

The provisions of this Citizen Participation Plan shall apply to activities presently being undertaken as well as to all future activities of the Community Development program. This plan shall remain in effect until all activities in the Community Development program are completed or until this plan is superseded by a new plan. Upon request by the U.S. Department of Housing and Urban Development, this plan shall be submitted to that agency to aid in the handling of complaints and to facilitate the monitoring and evaluation of the City's Community Development Program and all aspects of citizens' participation.

### **III. THE PARTICIPATION PROCESS**

Citizens participation is conducted at two levels – community-wide and in neighborhoods where development activity is proposed or underway. The community-wide process centers around official public hearings before the Consolidated and Annual Action Plan is adopted, and city-wide forums for citizens and City officials to discuss community development and housing issues at various stages in the planning process and the program. The neighborhood process includes citizens of lower income areas through the local housing authority.

The policies and procedures in this Citizen Participation Plan relate to several stages of action mentioned in law or regulation. In general, these stages or events include:

- A. Identification of housing and community development needs. As the initial step in the development of the Consolidated and/or Annual Action Plan, this shall include at least one public hearing prior to the development of the plan and at least one public hearing for comments when the draft is completed, both of which will be advertised at least ten days prior to each hearing.
- B. Preparation of a draft of use of funds for the upcoming year called the "Proposed Annual Action Plan". At times, there may also be the development of a proposed new Five-Year Strategic Plan.
- C. Formal approval by elected officials of a final Consolidated Plan and/or Annual Action Plan and/or Five-Year Strategic Plan.
- D. On occasion during the year, it may be necessary to change the use of the money already budgeted in an Annual Action Plan, or to change the priorities established in the Five-Year Strategic Plan. In that case, a formal Substantial Amendment will be prepared, considered and acted upon.
- E. The program year chosen by the City of Gastonia/Gastonia Consortium is July 1 through June 30.
- F. After a program year is complete, a Consolidate Annual Performance & Evaluation Report shall be drafted for public review and comment and then sent to HUD.

#### **IV. ADVISORY ROLE IN PARTICIPATION PROCESS**

The role of citizens and organizations is advisory to staff and the elected officials. This includes activities such as working with staff to develop neighborhood plans, monitoring and assisting in implementation, evaluating program results and participating in neighborhood meetings. The fundamental policy-setting and decision-making role in community development, as in any other activity, lies with the elected officials. Through the participation process, citizens advise and inform the staff, which in turn takes citizens' views, statements, proposals and opinions, and applies these to its own analysis of problems, issues and needs, and recommends a program of activities and projects. In essence, the staff advises the elected officials on the program that best addresses the community's needs as perceived by citizens and as derived from an examination of data and trends. Ultimately, the participation process is a political process involving citizens with their elected officials.

##### **A. Citizens Advisory Board**

There shall be a Citizens Advisory Board, whose purpose shall be to provide citizens with an adequate opportunity to participate in an advisory role in planning, implementing and assessing the Community Development Program of the City of Gastonia /Gastonia Consortium.

The Citizens Advisory Board shall consist of one (1) member selected by the Council to represent each of the City's six (6) wards or other areas deemed appropriate by the Council. Additionally, there shall be two (2) at-large members appointed by the Gaston County Commission to represent the County's unincorporated areas. (Representation for each city or township in the Gastonia Consortium shall be appointed by the respective city's mayor or town clerk for the HOME Consortium Committee, a subcommittee of the Citizens Advisory Board per A4 below.) There shall be substantial representatives in the membership of the board of low and moderate-income citizens and members of minority groups.

The eight (8) members of the Board, chosen to represent the City's six (6) wards and two (2) to represent the County's unincorporated areas, shall serve two-year staggered terms, but members may continue to serve until their successors are appointed and qualified. Members shall be appointed between the months of May and August, with the representatives of odd numbered wards appointed in odd numbered years and the representatives of even numbered wards appointed in even numbered years. The County's representatives shall be appointed (1) in an even year and (1) in an odd year. Members chosen to represent active neighborhood strategy areas, rehabilitation target areas and other areas designated by the Council shall serve terms that coincide with the period of time in which community development work is going on in the areas represented by such members.

The membership of any member of the Board who is absent from two (2) consecutive meetings and of whose percentage of attendance is less than fifty percent (50%) over a twelve-month period, shall automatically terminate unless such absence is excused by the Board for good and sufficient cause.

Citizens Advisory Board members shall receive no compensation but shall be entitled to reimbursement for expenses incurred in the performance of official duties to the same extent as and according to the policies applicable to City employees.

The City shall encourage, in conjunction with consultation with public housing authorities, the participation of residents of public and assisted housing developments, in the process of developing and implementing the consolidated plan, along with other low-income residents of targeted revitalization areas in which the developments are located. The City shall provide information to the housing agencies about activities related to its developments and surrounding communities so that the housing agencies can make this information available at the annual public hearing required under the Comprehensive Grant program.

#### 1. Meetings

- a. The Board shall hold regularly scheduled meetings at such times and locations as it shall designate, but it shall meet at least four times per year. Special or emergency meetings may be called by the City Manager, Community Development Administrator, the chairman or the vice chairman, provided that notice is given to all members, the press, and other persons in accordance with the Open Meetings Law (Article 33C, Chapter 143 of the North Carolina General Statutes);
- b. A quorum for the Board shall consist of the number of members equal to a majority of the non-vacant seats on the board;
- c. All official actions of the Board shall be taken by majority vote, a quorum being present;
- d. Minutes shall be kept of all Board meetings and a copy thereof shall be furnished to the City's Mayor, each Council Member, the City Manager, and the Chairperson of the County Commission within fifteen working (15) days after the date of the meeting for which the minutes are furnished;

#### 2. Officers

The officers of the Citizens Advisory Board shall be a chairman, a vice-chairman and a secretary. The chairman and vice-chairman shall be selected by the Board annually from among its membership. The Community Development Administrator shall serve as secretary to the Board, but may delegate these duties.

#### 3. Powers and Duties

The Citizens Advisory Board shall:

- a. Serve as the formal liaison between the general public and the Council and seek to promote active citizens participation in and support for all phases of the Community Development Program, including the grant application process;

- b. Articulate community development and housing needs, express preferences about proposed activities, assist in the selection of priorities and otherwise participate in the community development planning and implementation process including participation in policy decisions regarding program implementation;
- c. Hold in conjunction with the Council public hearings and hold neighborhood public meetings to inform the general public of the amount of funds available for projects that may be undertaken, and to solicit active discussion of the needs, preferences and priorities for community development projects, and to solicit public comments regarding program implementation;
- d. Assess the performance of the City of Gastonia/Gastonia Consortium in implementing the Community Development Program;
- e. Operate under the jurisdiction of the Council and report its progress to the Council.

4. HOME Advisory Committee

A HOME Advisory Committee shall operate under the jurisdiction of the Citizens Advisory Board. This committee shall consist of one (1) member representing each participating city or township that is part of the HOME Consortium Agreement. The City's Mayor or Town Clerk shall appoint the member to serve on the Committee. The appointee shall serve a (3) three year term which shall run consecutively with HOME Consortium Agreement. Members may be reappointed or new members appointed at the time of each new HOME Consortium Agreement. Activities for the HOME Advisory Committee shall be confined to one activity as stated in the HOME Consortium Agreement, which is the First Time Homebuyer Program providing down payment and closing cost assistance to participants residing in those cities or townships. The HOME committee shall meet two (2) times annually: (a) Once during the planning process of the Consolidated and/or Annual Plan and (b) Once prior to the submission of the Consolidated Annual Performance and Evaluation Report. Additionally, members will be notified of all public hearings related to the planning process and performance evaluation.

The Board may adopt rules and regulations governing its procedures consistent with the provisions of this article.

B. Neighborhood Community Development Groups

The Council encourages neighborhood groups, either existing organizations or formed Ad Hoc, to examine the Community Development needs of their representative neighborhoods. Due to staff limitations, these groups would not be able to obtain the level of City staff support given the Citizens Advisory Board; however, technical assistance in the articulation of neighborhood needs and development of proposals could be given to these groups by City staff on an as-needed basis, provided that such neighborhood groups have substantial

representation of low and moderate income persons and members of minority groups if such persons reside in the respective neighborhood.

C. Countywide Participation

The Countywide process consists of public hearings and information forums, over and above the other available lines of communication.

1. Public Hearings

Public hearings will be held at two points within each budget preparation cycle:

- a. At the beginning of the Consolidated and/or Annual Action Plan preparation cycle, hearings will be held to review past program performance and to obtain citizens views on community development, housing needs and priorities for funding. The notice for this hearing will include the amount of grant assistance expected (plus program income anticipated), the range of activities that may be undertaken, the estimated amount that will benefit persons of low and moderate income, and program performance review plans.
- b. After staff has drafted the proposed Consolidated and/or Annual Action Plan, a second public hearing will be scheduled for consideration by citizens and elected officials and submission to HUD. The notice for this hearing will include a summary of the contents and purpose of the Plan and the location(s) where the full Plan can be found.

Subsequent to these hearings, citizens will have thirty (30) days in which to submit written comments. All comments received will be considered in the preparation of the Plan and a summary of such comments will be included in the final submission to HUD, including the reasons why some comments were not accepted.

All public hearings will be advertised in local newspapers of general and minority community circulation, at least (10) ten days prior to the scheduled date and on the local Government Access Channel (television).

All public hearings will be held at locations providing accessibility for the mobility handicapped. All requests for appropriate auxiliary aids and services such as an interpreter for the hearing impaired must be made 48 hours prior to the public hearing. If notification is made 48 hours prior to the hearing, a translator will be provided.

2. Agency Consultation Process

Community Development staff will regularly meet with local and statewide housing, social service, homeless and homeless providers, local housing authorities, service groups that provide services to specific populations and educational agencies to determine the supportive housing needs of the specific populations and groups. Staff will also provide technical assistance, where needed, and will serve as a liaison between these agencies and other departments. Periodically, the staff will sponsor educational forums to bring similar agencies together to share information and develop more effective programs.

3. **Public Housing Residents**  
The Community Development staff shall work closely with the local Housing Authorities to define and address the housing needs of its residents. Staff encourages the involvement of public housing residents in the citizen participation process through the provision of technical assistance to tenant associations and by conducting special neighborhood meetings within a public housing development to assure that residents are aware of the Community Development programs planned activities and benefits.
4. **Informal Discussions**  
Community Development staff will be involved in community-wide meetings throughout the year and may hold informal discussion groups to review community development and housing questions. The views expressed at these discussions are considered when plan development occurs.

Although such discussions are valuable, the Department is more interested in planning and sharing ideas at the neighborhood level. We encourage each neighborhood interested in community development to discuss their needs and ideas with us at any time. Also, staff is available to provide technical assistance to neighborhoods upon request.

## **V. SCHEDULE OF CITIZEN PARTICIPATION**

This section sets forth the schedule, which the City of Gastonia/Gastonia Consortium intends to follow each year in the citizen participation process relative to planning, and evaluation of each year's Community Development program. It should be noted that the City regards citizen participation as a continuous process. When the citizen participation process is not involved in program planning and evaluation, more attention should be given to program monitoring.

- A. **Adoption of the Citizen Participation Plan**  
This new plan closely follows the original citizen participation plan adopted in 1978 and its revisions in July 26, 2000 and December 20, 2004. It has been reviewed and revised as of December 30, 2009.
- B. **Anti-displacement and Relocation Assistance Plan**  
This plan sets forth the City's policies and implementation program for relocation activities scheduled due to acquisition under the rules of Title II of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, Section 104d, (Public Law 91.646) and applicable State law.
- C. **Schedule of Public Hearings**  
The City will provide for at least two public hearings per year to obtain citizens' views and to respond to proposals and questions. These public hearings will be held at different times during the program year and will be advertised ten days in advance. A schedule of public hearings for the purpose described in this section shall be held at convenient times and locations, which permit broad participation, particularly by low and

moderate-income persons, and by residents of blighted neighborhoods. Arrangements shall make possible the full participation of handicapped citizens who wish to participate.

D. Notices of Public Hearings

The City shall, ten (10) days prior to each public hearing, publish a notice in easily readable type in the non-legal section of newspapers having general circulation in the City and County. The City shall also provide notice of hearings through press release handouts, church and civic organizations and by posting in public areas. All notices shall contain the following statement: "Individuals requiring special accommodations at this public meeting/hearing should call the ADA Coordinator at 866-6861 or 866-6843 for TDD users within forty eight (48) hours of the meeting hearing."

Notices requiring public hearings:

1. Consolidated Plan
2. Annual Action Plan
3. Consolidated Annual Performance and Evaluation Report

E. Annual Action Plan

The Community Development staff shall prepare an Annual Action Plan including objectives and projected use of funds for each fiscal year. The City of Gastonia/Gastonia Consortium's Community Development program shall amend its Annual Action Plan whenever there is a change in the use of CDBG funds from one eligible activity to another, decides not to carry out an activity described in the Annual Action Plan, to carry out an activity not previously described, or to substantially change the purpose, scope, location or beneficiaries of an activity. "Substantial Change" is defined as 20 percent or more change in Community Development's program purpose, scope, location or beneficiaries. The 20 percent will be calculated in financial terms.

The Annual Action Plan shall consist of the amount of funds expected to be available for proposed community development and housing activities, the range of activities, the estimated amount of funds to be used to benefit low and moderate income and plans to minimize displacement, program income expected, program income from the preceding year not programmed for use and any activity likely to result in displacement and plans for minimizing such displacement. At least one (1) public hearing will be held before the Citizens Advisory Board having been advertised in local newspapers of general circulation stating that the Annual Action Plan and all previous performance reports are available in the Community Development Office for public review and comment.

Copies of the Final Annual Action Plan and a summary of it will be made available to the public for free and within two days of a request. In addition, copies will be available at the Public Housing Authorities and the Community Development office.

F. Displacement Policy

Minimizing displacement is a local public policy. The objective is attained through the community planning and review process through which projected displacement requires justification and incorporation as an element of project feasibility assessment. Some community development activities will require the displacement, or relocation, of a person or household. The displacement can occur on a temporary or permanent basis and as the result of concentrated code enforcement efforts, the need to rehabilitate property, or acquisition and demolition of substandard property for redevelopment projects. Any person or household displaced as a result of Community Development program activity will receive a full range of relocation services, including housing counseling.

1. Concentrated Code Enforcement: Families and individuals may be displaced by concentrated code enforcement if:
  - a. They reside in a dwelling unit found unfit for human habitation and which has been ordered to be removed or vacated and closed due to community development activities; or
  - b. They reside in a dwelling unit found unfit for human habitation in which conditions are so severe as to warrant the initiation by Community Development staff of procedures to assist the resident to relocate to housing fit for human habitation.

G. Program Implementation and Performance

The Citizens Advisory Board shall be actively involved in monitoring and evaluating the Community Development program. The Citizens Advisory Board will review and comment on the Consolidated Plan, Annual Action Plan, Consolidated Annual Performance and Evaluation Report (CAPER), and any amendments, etc. Citizens and citizens organizations are encouraged at all times to assess and submit comments on all aspects of the Community Development program performance, including the performance of the City's grantees and contractors. They are also encouraged to assess projects and activities to determine whether objectives have been achieved. Such views may be submitted in the methods set forth in Section V herein.

The CAPER presented to the public shall contain at least as much detail as was required by HUD for the Grantee Performance Reports. The CAPER will have an accounting for each activity in the Annual Action Plan until an activity is officially closed out with HUD by the jurisdiction.

The City will submit in its annual CAPER:

1. Copies of written comments submitted by citizens regarding the Community Development program and its performance;
2. The City's assessment of such comments; and
3. A summary of any actions taken in response to the comments received.

H. Non-English Speaking Residents

In areas where a significant number of non-English speaking residents will be affected by Community Development programs, a translator shall be provided in order all ensure citizens participation in the planning efforts.

VI. SUBMISSION AND CONSIDERATION OF VIEWS AND PROPOSALS

The City of Gastonia/Gastonia Consortium encourages the submission of views and proposals regarding the Community Development program by citizens and citizens groups, particularly low and moderate-income persons and residents of blighted neighborhoods. This includes the submission of such views:

- A. Directly to the City staff during the planning period prior to public hearing on the application.
- B. To the Citizens Advisory Board at public hearings or any meeting of the board.
- C. At neighborhood public meetings held by the City.

The Community Development Division shall provide timely responses to all proposals submitted pursuant to the process described herein, including written responses to written proposals stating the reasons for the action taken by the city or the Citizens Advisory Board on the proposal.

Written responses to written proposals shall be provided within thirty (30) days of submission. If a written proposal is submitted less than forty (40) days prior to the final public hearing on the application, Community Development shall, whenever practical, provide a written response within five (5) days prior to said hearing.

VII. CONSIDERATION OF OBJECTIONS TO THE APPLICATIONS

Persons wishing to object to the approval of a block grant application may make such objections to:

U.S. Department of Housing and Urban Development  
Greensboro Area Office  
Asheville Building  
1500 Pinecroft Road, Suite 401  
Greensboro, NC 27407-3838

HUD will consider objections made only on the following grounds:

- A. The City's description of needs and objectives is plainly inconsistent with available facts and data; or
- B. The activities to be undertaken are plainly inappropriate to meeting the needs and objectives identified by the City; or
- C. The application does not comply with applicable laws and regulations, or;
- D. The application proposes activities, which are otherwise ineligible under the Community Development Block Grant regulations.

Such objections should include both an identification of the requirements not met and, in the case of objections made on the grounds that the description of needs and objectives is plainly inconsistent with significant, generally available facts and data, the data upon which the objections are relying. Although HUD will consider objections submitted within thirty (30) days of the publication of the notice that the application has been submitted to HUD. In order to ensure that objections submitted will be considered during the review process, HUD will not approve an application until at least forty-five (45) days after the receipt of an application.

**VIII. COMPLAINTS**

All complaints concerning the City of Gastonia/Gastonia Consortium's Community Development program should be addressed to:

Administrator, Community Development Program  
City of Gastonia/Gastonia Consortium  
Community Development Division  
Post Office Box 1748  
Gastonia, North Carolina 28053-1748

Or may be made verbally by calling the Community Development Administrator, City Hall, Community Development Division, 704-866-6752. The City shall make every reasonable effort to provide written responses to written complaints within fifteen (15) working days. A summary of complaints and actions taken will be included in the grantee and evaluation report.

**IX. TECHNICAL ASSISTANCE**

The City of Gastonia Community Development Division will be responsible for providing technical assistance to the Citizens Advisory Board, neighborhood organizations and other citizen participants on matters pertaining to the planning, implementation and assessment of the Community Development program. The Community Development staff and the Citizens Advisory Board will be responsible for assisting groups of residents of blighted neighborhoods which request assistance in developing proposals and statements of views.

**X. INFORMATION DISSEMINATION**

In order for the Citizen Participation Plan to be implemented, it is necessary that information about Community Development and the citizens participation process be provided for full public access to program information and affirmative steps taken to make adequate information available to citizens, especially those of low and moderate income and to those residing in lower income or blighted neighborhoods. The following methods shall be utilized for information dissemination:

- A. Provide information freely to the local news media and invite their attendance to meetings of citizens groups;
- B. Announce public hearing meeting schedules through paid advertisements in the newspapers and radio public service announcements;
- C. Public speaking engagements by the Community Development staff should inform citizens about the citizens participation process;

- D. Public notices should be posted in conspicuous public places to inform citizens about the citizens' participation process. This information should also be disseminated through neighborhood churches and civic and fraternal organizations.

Through the above methods, the City shall make public the following information at the time that the City begins planning for the next program year through preparation of the Annual Action Plan.

- A. The total estimated amount of Community Development Block Grant (CDBG) and HOME Investment Trust (HOME) funds available to the City;
- B. The range of activities that may be undertaken with CDBG and HOME funds and the kind of activities previously funded by the City;
- C. The national objectives of the Community Development Block Grant Program and the HOME Investment Trust Fund;
- D. The process to be followed in drawing up and approving the application and the schedule of meetings and hearings;
- E. The role of citizens in the Citizens Participation Program;
- F. A summary of other important program requirements; and
- G. That the City has a Citizen Participation Plan, which is available for public review.

The City of Gastonia/Gastonia Consortium provides for full and timely disclosure of its program records and information consistent with applicable state and local laws regarding personal privacy and obligation of confidentiality. Documents relevant to the program are available at the Community Development Office during normal working hours for citizens review upon request (either written or oral). Such documents include the following:

- A. Mailings and promotional materials;
- B. Records of public hearing;
- C. All key documents, including all prior applications, letter of approval, grant agreements, Citizen Participation Plan, performance reports, evaluation reports, other reports required by HUD, and the proposed and approved application for the current year;
- D. Copies of the regulations and issuances governing the program; and
- E. Documents regarding other important program requirements, such as contracting procedures, environmental policies, Fair Housing and other equal opportunity requirements, and relocation provisions.

When the City submits its CDBG & HOME application to HUD, the City will publish a notice in *The Gaston Gazette* and the *Charlotte Observer* that the application has been submitted and is available to interested parties upon request and describing the requirements on citizens objections to applications contained in Section VI, herein.

The City shall make copies of the Citizen Participation Plan, the proposed and approved application and the CAPER available at convenient locations for persons affected by the program and accessible to the handicapped.

**XI. CONTINGENCIES AND LOCAL OPTION ACTIVITIES**

The Citizens Advisory Board shall be involved in an advisory role in selection of contingency or local option activities to the extent of making recommendation of expenditures.

**XII. PROGRAM AMENDMENTS**

The Final Annual Action Plan will be amended anytime there is: a change in one of the priorities presented on the HUD-required Priority Table; a change in the use of money to an activity not mentioned in the Final Annual Action Plan; or, a change in the purpose, location, scope, or beneficiaries of an activity. The public will be notified whenever there is an amendment.

**A. Substantial Amendments**

The following will be considered "substantial" amendments:

1. A change in the use or scope of CDBG or HOME money from one activity to another when the dollar amount exceeds 20% of the CDBG or HOME program; or
2. The elimination of an activity originally described in the Annual Action Plan; or
3. The addition of an activity not originally described in the Annual Action Plan; or
4. A change in the purpose or type of an activity or its ultimate objective; for example, a change in the construction project from housing to commercial.
5. A meaningful change in the location of an activity.
6. A change in the type or characteristics of people benefiting from an activity. Among the characteristics are:
  - a. The HUD-recognized income levels of 0%-30% of area median income; between 31% and 50% of AMI; and between 51% and 80% of AMI.
  - b. Race or ethnicity.
  - c. Renter or homeowner.
  - d. Single households, small ones (2-4 persons), large ones (5+ persons)
7. A 20% decrease in the number of low or moderate income people benefiting from an activity.

- B.** The Citizens Advisory Board, in an advisory role, shall be involved in the development of program amendments except for those for disaster activities. The Board's role shall consist of proposing projects, as well as commenting and making recommendations on proposed programs. If the nature of the amendment is such that prior HUD approval is required, the

City will hold a public hearing on the amendment. Should changes be deemed substantial a public hearing will be held before the Citizens Advisory Board to solicit citizen comment.

- C. The City of Gastonia/Gastonia Consortium Community Development program shall amend its Annual Action Plan whenever there is a change in the use of CDBG funds from one eligible activity to another, decides not to carry out an activity described in the Annual Action Plan, to carry out an activity not previously described, or to substantially change the purpose, scope, location, or beneficiaries of an activity. Until further notice, "Substantial Change" is defined as 20 percent or more change in program purpose, scope, location or beneficiaries. The 20 percent will be calculated in financial terms at it relates to the CDBG OR HOME program.

Prior to amending the Community Development Annual Action Plan, the Community Development Office shall provide citizens with the opportunity to comment on such proposed changes in the use of funds before the Citizens Advisory Board. A notice of the proposed change and meeting date will be published no less than ten (10) days prior to the meeting in a local newspaper of general circulation. Community Development will receive comments on substantial amendments for a period of thirty (30) days before the amendment is implemented. The Community Development Administrator shall consider any and all comments and, if deemed appropriate, modify the changes. The Community Development Office shall make public and shall submit to the HUD Greensboro Office a description of any changes adopted which shall be signed by the Community Development Administrator or approved designee.

**XIII. COMPLETED CONSOLIDATED PLANS, ANNUAL PLANS & EVALUATIONS**

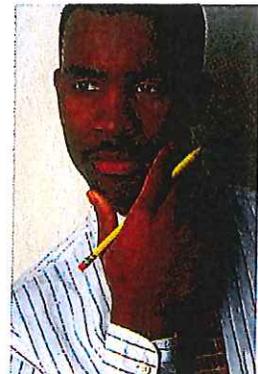
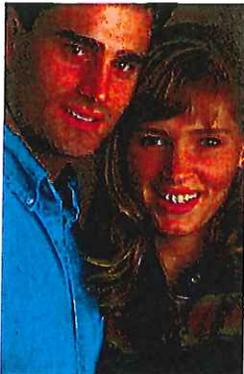
The City of Gastonia/Gastonia Consortium shall make available to citizens, public agencies, and other interested parties copies of Consolidated Plans, Annual Plans and Evaluations (CAPER) for five years after completion of such documents. Citizens, public agencies, and other interested parties shall have reasonable and timely access to the information and records related to the programs covered in the Consolidated Plans, Annual Plans and Annual Evaluations (CAPERS).

**XIV. RESPONSIBILITY AND AUTHORITY OF CITY**

No part of this plan for citizens participation shall be construed to restrict the responsibility and authority of the City of Gastonia/Gastonia Consortium for development of the Community Development application and the execution of the Community Development Program. Accordingly, the Citizen Participation Plan set forth herein does not include concurrence by any person or group involved in citizens participation in making final determination concerning the findings and contents of the application. The sole responsibility and authority to make such final determinations rests exclusively with the City Council.

***Ten Year Plan to End Homelessness***

***Gastonia and Gaston Consortium***



***A Community  
Road To Home***

Adopted May 5, 2009

## *INTRODUCTION*

In 2005, the City of Gastonia embarked on an ambitious plan to break the cycle of homelessness in ten years. As part of a national movement, cities and towns across America formed an alliance with the United States Interagency Council on Homelessness in Washington, DC. Mayor Jennifer Stultz, supported by a number of constituents representing social services agencies, community leaders, non-profits organizations and faith-based leaders, engaged in serious work to create solutions and strategies to end the cycle of homelessness. This leadership and the work of each constituent member has resulted in progress and commitment to do more to advance the idea of ending homelessness, in particular chronic homelessness because of the high cost of people living on the streets. These costs affect our local medical care system and hospital emergency room, the legal system and our local jail, public social service systems and non-profit resources.

During the past two years the Task Force on Homelessness has worked to look at National Best Practices to end homelessness and through community engagement or support began the implementation process of making best practices a part of our local plan. National, regional and local studies of best practices prove that best practices work to the good of communities because engaging homeless individuals in a positive way reap a cost savings of local tax dollars. Locally, a non-profit organization implemented a national best practice to engage chronically homeless people through a "housing first" program. Statistics indicate that placing a chronically homeless person in housing "first" and providing wrap around supportive services has a national success rate of 90% or more. Individual results indicate a direct correlation between reduced costs of local jails, courts, hospitals and health care systems and repeated emergency housing by 40% the first year and 60% the second year.

Homelessness, in particular chronic homelessness, is a multi-faceted challenge facing communities across this country. It arises from multiple causes and its complexity can easily confound government, law enforcement, health care providers, social service agencies, the faith-based community and non-profit entities. Homelessness affects us all because it is human suffering that is before our eyes; although affecting only a few, it touches the many.

Gaston County is recognized for its excellent quality of life, its friendly human spirit and its power to embrace an issue and respond. Now is the time to take up a new challenge: to reduce and end homelessness. Gaston County has not previously ignored the problem of homelessness; however, past programs have not marshaled the commitment, resources, and level of coordination that is required to solve the problem. Although homelessness may always exist, supports can be implemented and coordinated that minimize the tragedy on the few citizens that it touches.

## *The Planning Process*

Without the assistance of many caring citizens, their insights and opinions with thoughtful input and dedication, our community would continue to cycle chronic individuals in and out of homelessness. It is with this dedication that the planning process was given life that developed specific goals and actions for the Gastonia/Gaston Consortium Ten Year Plan to End Chronic Homelessness. The planning process included members of The Mayor's Task Force on Homelessness, the Care Connection members (the main work group of service providers and private citizens), housing focus groups which captured business leaders, government stakeholders, foundations, service providers, private citizens, the faith community and homeless participants. Participants over the two-year period of work groups and focused committees include:

### **Government Sector**

Jennifer Stultz, City of Gastonia Mayor  
Joe Carpenter, Gaston County Commissioner  
Tom Keigher, Gaston County Commissioner  
Edward Munn, Gastonia (Former) City Manager  
Alan Cloninger, Sheriff, Gaston County  
Terry Sult, City of Gastonia Police Chief  
Chuck Lifford, Captain, City of Gastonia Police Department  
Susan Psomadakis, Officer, City of Gastonia Community Police Division  
Kim Johnson, Officer, Gaston County Sheriff's Department  
James Bailey, Captain, Gaston County Sheriff's Department  
Keith Moon, Executive Director Gaston County Dept. of Social Services  
Angela Karchmer, Gaston County Dept. of Social Services  
Gary Foster, Executive Director, Gastonia Housing Authority  
Kathy Dixon, Gaston County Court System  
Jean Waters, Gaston Memorial Hospital/Caromont Health  
Annie Thombs, Community Development Administrator, City of Gastonia  
Ron Phillips, Employment Security Commission  
Brett Keeter, Office of Congressman Patrick McHenry  
Linda Ferster, Office of Congresswoman Sue Myrick  
Peggy Bostic, City of Gastonia

### **Non-Profit & Foundation Sector**

Angela Dreher, Executive Director, As One Ministries, Inc.  
Carolyn Bergman, St. Michael's/St. Vincent de Paul  
Donyel Barber, Gaston County Interfaith Hospitality Network  
Beth Bolin, The Shelter of Gaston County  
Sharron Funderburk, Executive Director, Off the Streets & Formerly Homeless  
Dr. Patricia Krikorian, Executive Director, With Friends, Inc.  
Brenda Henningham, Program Director, With Friends, Inc.

Anissa Lipscomb, Consumer Credit Counseling Services  
Mary McCreight, Executive Director, Reinvestment in Communities of Gaston County  
Joan Coffey, Finance Administrator, Reinvestment in Communities of Gaston County  
Jeff Thompson, Executive Director, Linked Economic Development & Afford. Housing  
Barry Lineberger, Shelter + Care Program Director, Gaston Residential Services, Inc.  
Lynette Demperio, Finance Director, Gaston Residential Services, Inc.  
Karen Andrews, Executive Director, Catherine's House  
Shawn White, Director, A Place To Call Home  
Spurgeon Mackey, Community Foundation of Gaston County  
Patty Busch, Executive Director, AIDS Council of Gaston County  
Sandra Alston, Director, House of Refuge  
James Biddix, Director of Christian Services, The Salvation Army  
Stanley Colbert, Captain/Commanding Officer, The Salvation Army  
Carolyn Moore, Gaston County United Way  
Barbara Dover, ABC Human Services  
Barbara Voorhees, Glenn Foundation  
Jim Barringer, Cornerstone Christian Center  
Michelle Hice, As One Ministries

**Business & Private Sector**

Christine Achre, Achre Consulting  
Anne Shenk, Interior Images  
Glenn Rowland, Private Citizen/Retired from Gaston County Schools  
Rick Smyre, President, Center for Communities of the Future  
Benjy Carpenter, Private Citizens  
Betty Psomadakis, Private Citizen/Retired  
Sammy Smith, Homeless  
Bill Seabrook, Private Citizen  
Phillip Psomadakis, Private Citizen  
Susan Hefner-Heun, Rev., First United Methodist Church  
Herman Huitt, Rev., Private Citizen/Retired  
Frank King, Rev., Private Citizen  
Kevin Mackey, Rev. Holy Communion Lutheran Church  
Dennis Lee, W.D. Lee & Company  
Ted York, Rev. Ranlo Baptist Church  
Kim Cruise, Homeless  
Bruce Hodge, First National Bank  
Linda Slade, Private Citizen  
John Stanley, Private Citizen  
Tammy Moore, Private Citizen & Formerly Homeless  
Cornelius Lynch, Private Citizen & Formerly Homeless

## The Faces of Homelessness

Nationally, there are three patterns of homelessness that have been identified: transitional, episodic, and chronic. **Transitional homelessness** is described as a single episode of homelessness that is relatively short and often occurs in times of economic hardship and/or temporary housing loss. The majority of individuals in this category are families and single adults. **Episodic homelessness** is recurrent periods of homelessness. Typically, individuals who experience this are younger, use the shelter system, and often have substance addictions. Research indicates that 9% of the single adult homeless population fits the pattern of episodic homelessness. **Chronic homelessness** refers to an extended episode of homelessness that generally lasts one or more years. Homeless persons in this category are more likely to have a serious mental illness, sometimes along with a substance addiction, unstable employment history and a history of hospitalization or incarceration.

Chronic homelessness is particularly tragic. This type of homelessness has become more prevalent in recent years due to the downsizing of institutions for people with mental illness and the placing of mentally ill people in the "least restrictive environment" as required by federal law. Without proper monitoring of daily medications or the inability to obtain appropriate medication, mentally ill individuals lose housing. More tragic is when mentally ill individuals are released from institutions directly to an emergency shelter and immediately become homeless with no resources.

The U. S. Department of Housing and Urban Development defines a chronically homeless person as an unaccompanied homeless individual with a disabling condition (which is, mental illness, a developmental or physical condition that is disabling, substance abuse or dually diagnosed) who has either been continuously homeless for a year or more or has had at least four (4) episodes of homelessness in the past three (3) years. To be considered chronically homeless, persons must have been sleeping in a place not meant for human habitation, that is, living on the streets, and/or in an emergency homeless shelter during that time. The United States Interagency Council on Homelessness estimates that chronically homeless persons make up about 10% of all homeless persons, but consume 50 percent of available resources. Gaston County's chronically homeless population, when first tracked was 31% of the individual/single homeless population, far exceeding the national estimate. In the 2008 count of the individual/single homeless population, on one given night, the number has decreased to 14%.

## Gastonia/Gaston Consortium's Homeless Facts

The Continuum of Care Services Committee conducted an annual Point-in-Time Count of homeless individuals and families on January 28, 2009. Listed below is the statistical information gathered:

- On January 28, 2009 volunteers were able to count **493** people in Gaston County without anywhere to live. We know this is not everyone that is without a home on a typical day in our community, but it is every person that sought assistance during the Point-in-Time Count period.
- In one single day, there are **287** men and **78** women who are single unaccompanied individuals without housing **that we can actually count**. Of these single individuals **26 met the U.S. Dept. of HUD definition of chronically homeless**. Chronically homeless means they have a disability and they have not had a place to live for more than a year or they have had four or more episodes of no housing in the last three years. Many single individuals without homes are disabled and receive disability income that is not sufficient to afford a place to live.
- In one single day, there are **42 families with 86 children** that have no place to call home. Many more families are living with friends or doubled up with relatives because of a job loss, an illness or other circumstances often beyond their control.
- Domestic violence and family breakup account for approximately **62% of the families** that are homeless.

In 2007, the Continuum of Care work group were able to count 2,580 unduplicated homeless persons in the Gastonia area; a **decrease** of 118 homeless people the prior year. Because of the work of the continuum and its local service partners, in particular Pathways, as well as funders such as the City of Gastonia's HOME entitlement funds, the Federal Home Loan Bank-Atlanta, U. S. Dept. of HUD and the North Carolina Housing Finance Agency, chronic homelessness has decreased significantly from 154 to 102, a 33.7% decrease from 2007 to 2008. Additionally, from 2008 to 2009, Gaston County realized another decrease in chronically homeless from 102 to 26. However, with the count of more than 70 homeless people incarcerated on the Point-in-Time Count day, probability is that the chronically homeless population may be upwards of 80 to 90 single individuals.

## The Cost of Homelessness

To end chronic homelessness, Gaston County must have a community-wide effort championed by government, business, non-profits, and faith-based partners ...all citizens of this community that work to make sure no one must live on the streets. Not only is homelessness a human issue it is an economic issue. On January 30, 2008 a point-in-time count of homeless persons tells us that Gaston County had 102 chronically homeless people. With chronic homelessness come illnesses, emergency room visits, episodic misdemeanors, vagrancy charges, public intoxication, panhandling, police labor and often court and/or jail time as well as repeated stays in emergency shelters and services repeatedly, which is an annual perpetual cost.

A typical scenario of the cost of one chronically homeless person, listed below, is based upon actual tracking of a sample of randomly chosen homeless individuals over a two-year period.

1. Average of five (5) emergency room visits per year	\$ 6,000.
2. Average of four (4) health department visits per year	360.
3. Three arrests per year with 8 day stay in local jail	1,440.
Police time	375.
Public defender/Court system	1,050.
(and if case goes to jury)	1,200.
4. Emergency shelter stays for a total of 56 days @\$20/day	1,120.
5. Collections received panhandling from local citizens	1,475.
6. Average of two ambulance assists to hospital	1,200.
7. Petty Theft / Check Fraud (without arrests)	2,200.
8. Selling food stamps	200.
Total community cost for one homeless person per year	\$16,620.

Multiply the cost of one by the number of chronically homeless people that were actually counted on a particular day in January, 2008 (102 chronically homeless individuals times \$16,620./annual cost). The cost burden of chronically homeless living on the streets has an annual tab in Gaston County of \$1,695,240, as a conservative estimate.

The alternative to living on the streets or in emergency shelters is permanent supportive housing. The average cost for permanent housing and services according to current local programs is \$15 per day or \$5,475 annually; less than one-third the cost of a person living on the streets. Added to a regular health prevention program covered by Medicaid with the community picking up 10% of the required match or approximately \$200 per year. Therefore, it becomes more economically feasible for a community to address the homeless problem through provision of housing and services than to continue to ignore the year after year cost to the community. "Housing First", a National Best Practice has yielded less than 10% recidivism among chronically homeless.

## National Best Practices

Based upon dramatic reductions in homelessness, particularly chronic homelessness in many major cities across the country, modeling the best practices of these cities should produce the same positive affect in our local community.

### **1. Housing First**

A concept first implemented in New York, housing first is a departure from the traditional continuum of care model of emergency shelter to transitional housing with supportive services to permanent housing with little or no supports. Housing First skips directly to placement in permanent housing with a wrap-around community support system. With a 90% success rate, this model immediately provides supportive services to chronically homeless individuals, reduces court and jail time, hospital and emergency room visits as well as non-profit and social service agency resources.

### **2. Rapid Re-Housing**

A true community outreach program, rapid re-housing involves faith congregations, local government, foundations and business sponsors. Families and elderly that become homeless are surrounded by a team of six to eight people from one congregation that mentor the family or elderly person for six months to one year. Housing is subsidized through a small commitment from each congregation (\$1200 - \$1500). Local government provides a community coordinator that work with non-profit agencies and the faith community. Local foundations and business provide additional financial and employment support based upon individualized needs or the financial support for the program in general. The concept came about when Hurricane Katrina devastated Louisiana and many families were left with no means to survive. Cities all across the country took Katrina victims in and surrounded them with immediate housing, employment and moral support. Rapid re-housing curbs the length of time a family experiences homelessness and lessens the negative impact on the family, especially the children. The program also provides a central screening location so homeless families have an immediate assessment to determine appropriateness for rapid re-housing.

### **3. Discharge Protocols to Prevent Homelessness**

Discharge planning on the state level is necessary. The implementation of agreements between local leaders/continuum of cares and institutional discharge programs, which include foster care, local jails and hospitals, state prison systems and mental health hospitals, that agree persons should not be discharged into homelessness. State administrative code dictates discharge should be to appropriate housing and often a housing backup plan should be in place. Local monitoring of these systems are necessary in order to prevent state overburdened

systems from failing to perform due diligence in assuring no one is discharged into homelessness.

#### **4. Project Connect Events**

Planned events that connect people living on the streets or other places not meant for human habitation with appropriate community services is a first step into introducing the homeless individual to services that will address the cause(s) of their homelessness. Nationwide events may be held from monthly to annually.

#### **5. Building infrastructure**

Housing, housing, housing is the key to reducing and eliminating chronic homelessness. Systems of care are much different than thirty years ago when mental institutions retained people for long periods of time rather than releasing them to the "least restrictive environment". A system of community treatment, linked to housing, must replace the downsizing of state mental hospitals. This new infrastructure must include income supports and services with the housing.

### **Local Identified Needs**

Individuals who are homeless may not fit into one general description but they do share common needs, including affordable housing, adequate income sources, health care and safety with a broad system of services. Given those common needs, the homeless task force planning and work groups determined to focus on three (3) system elements.

- 1. Housing** - Choice of different housing options that (a) will ensure long-term stability and (b) will be affordable for homeless individuals and families is vital. Permanent supportive housing must play a leadership role for homeless individuals with disabilities. Additionally, there needs to be adequate preventative housing supports such as emergency shelters, transitional housing programs and housing first initiatives in order to prevent homeless individuals from falling into the definition of chronically homeless.
- 2. Economic Stability** - Many individuals who become homeless are eligible for assistance from public and private systems of care, including benefits that can assure steady incomes. Often, these systems present obstacles that can impede access. In addition, job training, readiness and placement are necessary for homeless individuals who are able to work.
- 3. Health and Safety** - Most individuals and families who experience homelessness need access to a range of comprehensive services that respond to their complex and unique needs. Homeless individuals may need services such as subsidized housing, employment training or employment opportunity, mental health care, case

management and/or transportation in order to remain in stable housing and to maintain employment. Therefore, it is important that there is a seamless system of coordinated services that are coupled with the affordable housing options in order to encourage homeless individuals and families to succeed. Additionally, safety issues for police, private business and the homeless individual living on the street must be addressed in order to prevent negative impacts as a result of living in places not meant for human habitation.

## **Services in Place - 2008**

### Emergency Shelter:

- The Salvation Army - 42 beds for single men and single women
  - 5 family room for families with children
- Gaston Interfaith - 12 to 14 beds for 3 or 4 families with children
- With Friends, Inc. - 9 beds for unaccompanied youth up to age 17

### Transitional Housing:

- Catherine's House Belmont – 9 beds for single women and
  - 5 family rooms for single women with children
- With Friends/Adams House – 8 beds for young men 18 to 21

### Permanent Supportive Housing (specifically designated for disabled homeless):

- Pathways/Gaston Residential – 32 housing units for single individuals
  - 10 housing units for families (24 beds)
- Reinvestment in Communities – 20 apartment units for single individuals or small families with children; however preference is given to chronically homeless individuals
- As One Ministries-Housing First – 4 apartment units for single individuals who are chronically homeless

### Prevention Efforts:

There are a number of helping agencies within the area that assist with homeless prevention services such as rental/mortgage, utilities, food, clothing, medicines and transportation. In addition, the local shelters and transitional housing facilities who are members of the CoC have adopted and implemented specific protocols that prevent institution discharges into homeless facilities.

### Outreach Services:

Pathways LME have federal grants to do outreach services for homeless people living on the streets and in emergency shelters to engage them and make service referrals

related to behavioral health. Additionally, the Pathways ACT program works with homeless individuals for behavioral health identification and referral.

Supportive Services:

Supportive services are available through Pathways LME using Medicaid or State of NC Indigent funds, Gaston Family Services, a service are of the Health Dept. and the local hospital for emergency and major medical services.

## Plan for Addressing Identified Needs

### Housing:

1. Develop Permanent Supportive Housing (PSH) Opportunities for Homeless Individuals and Families. Permanent Supportive Housing is housing made affordable to homeless individuals that has links to health, mental health, employment and other social services. By providing homeless individuals with a way out of expensive emergency public services and back into their own homes, PSH not only improves the lives of its residents but also generates significant public savings. PSH development includes the following features:

- Successful housing options for the homeless population must include a variety of options to promote choice and appropriateness;
- Adequate development along the housing continuum includes a combination of scattered-site (single units, duplexes, etc.), possibly modular, congregate living and single room occupancy units.
- Development can be accomplished through construction, renovation, or master leasing of existing housing stock;
- Density not to exceed 12 units per development and scattered site is preferred;
- Housing must have access to public transportation, and be located within walking distance of essential services and amenities (food, laundry facilities, bus routes);
- Establishment of community as peer support is linked to long-term housing stability;
- Ongoing assessment and evaluation of adequate housing development for homeless persons will be conducted utilizing annual counts and other monitoring efforts.

2. Identify All Existing Funding Sources & Develop New Funding Initiatives

When considering financing for permanent supportive housing, three distinct costs should include: funds for housing development (rehab and new construction), funds for rental subsidies (ongoing), and funds for support services

(ongoing). Funding Opportunities to explore:

- Local housing trust fund with a recurring, dedicated funding source;
- City of Gastonia Federal Home dollars for specified Community Housing Development Organization;
- HUD Section 811 and 202;
- City of Gastonia Community Development Block Grant (CDBG) and HOME allocations;
- HOPWA, Ryan White, and SAMHSA federal funding;
- N.C. Housing Finance Agency federal low income housing tax credits (LIHTC)
- Bond financing programs;

- Federal Home Loan Bank of Atlanta under the Affordable Housing Program;
  - N.C. Housing Trust Fund and 400 SHPD Initiative;
  - HUD Continuum of Care funding for Shelter Plus Care (S+C) and Housing First Initiatives;
  - Regional Banks;
  - Faith-based community initiatives and investments;
  - Foundations that provide funds for brick and mortar;
  - Private donations.
3. Establish Leadership Committee to secure lead private and corporate gifts for housing development: Leaders in the public and private sector to initiate private and corporate giving opportunities directed toward housing development. The fund could be managed by an existing foundation such as The Community Foundation of Gaston County. The faith community, business and corporate community, foundations and individuals will be educated on the philanthropic opportunity. Philanthropic gifts would be focused on the one-time expense of housing development.
  4. Fast track the process of plan approvals for housing targeted for very low income individuals and those that will serve disabled and homeless individuals/families: City and county officials develop a process whereby engineering and housing plans are fast tracked through the system when the development is targeted for populations to be served through the Continuum of Care.

### **Economic Stability**

1. Develop formal protocols with key public service providers: Key providers will help to ensure full early access by homeless individuals to all publicly funded benefits and service programs. The key providers include the local office of the Social Security Administration, the State Office of Disability Determination, the local and state offices of the Department of Health and Human Services, the N.C. Employment Security Commission and the Welfare to Work programs.
2. Continue to provide access to service providers on the national SOAR initiative training: The SSI/SSDI Outreach, Access and Recovery (SOAR) Initiative is a national best practice that trains case managers and service workers in the process of assisting a disabled person who is homeless to apply and receive Social Security Administration Disability Benefits quickly in order to stabilize them in housing.
3. Conduct an analysis and develop solutions for the public transportation system that prevents homeless individuals from participating in job opportunities and maintaining employment: There are many job opportunities outside of the City limits of Gastonia so it is imperative that municipalities work together to develop

a mass transit system that addresses the transportation barriers of homeless individuals, as well as our citizens in general, which limit employment opportunities or cause hardship in securing and maintaining employment.

### **Health & Safety**

1. Establish new or expanded services to complement existing services: In order to achieve the overarching goal that untreated health conditions, illnesses and injuries will not longer cause or prolong homelessness in the City of Gastonia, new and expanded services are needed:
  - Temporary and transitional housing to engage chronically homeless into systems of care who initially refuse permanent supportive housing;
  - Increased residential substance abuse treatment for indigent and uninsured persons; and
  - Respite care setting(s) for recuperation of persons without homes after hospital discharge.
  
2. Conduct a comprehensive assessment of health care system capacity and need: The current public health care system often forces people to seek medical assistance in the emergency room causing cost to rise dramatically. Develop a working group that will do a comprehensive assessment and provide written recommendations to the County Commission for expansion of the public health system.
  
3. Conduct a comprehensive assessment of the cost, crime rate and causes of arrests of homeless people that are often seriously mentally ill: Overloading the legal system with chronically homeless persons who are mentally ill is a costly process that will continually repeat itself. Develop a working group that will do a comprehensive assessment and provide written recommendations to the Gastonia City Council that will be more cost effective than repeated offenses.

### **Collection of Accurate Data**

In order to assess effectiveness of the Ten Year Plan goals, all homeless service providers will be encouraged to keep accurate data in a Homeless Management Information System, which is the Carolina Homeless Information Network (CHIN), in the State of North Carolina. Funding sources expect to hold service providers to the highest standards of accountability; therefore, timely and accurate data will ensure continued support, allow the community access to statistical information, document services provided and offer accountability as well as document benchmarks.

## Conclusion

According to the U.S. Interagency Council on Homelessness, the key elements in a successful Ten Year Plan is: Disciplined People, Disciplined Thought, and Disciplined Action. Therefore, the following ten elements are necessary to implement the Ten Year Plan:

1. Political and Community Will;
2. Partnerships;
3. Consumer-Centered Solutions;
4. A Business Plan;
5. Budget Implications;
6. Prevention and Intervention;
7. Innovative Ideas;
8. Implementation Team;
9. Broad Based Resources; and
10. Living Documents.

Many in the planning and work groups discovered a coordinated and collaborative system that has already proven, through statistical data, a reduction in chronic homeless individuals in the City of Gastonia. Implementing and enhancing the goals in this Ten Year Plan requires a concerted effort of the community but will reward resolution of current issues and decrease the community's cost of people living on the streets.

# Point-in-Time Summary Homeless Populations Summary for NC-509 - Gastonia/Cleveland, Gaston, Lincoln Counties CoC

Date of PIT Count: 1/29/2014

Population: Sheltered and Unsheltered Count

## Total Households and Persons

	Sheltered			Unsheltered	Total
	Emergency	Transitional	Safe Haven		
Total Number of Households	132	44	0	167	343
Total Number of Persons	183	49	0	191	423
Number of Children (under age 18)	34	5		21	60
Number of Persons (18 to 24)	20	8	0	10	38
Number of Persons (over age 24)	122	36	0	160	318

## Gender

	Sheltered			Unsheltered	Total
	Emergency	Transitional	Safe Haven		
Female	91	32	0	51	174
Male	92	17	0	140	249
Transgender	0	0	0	0	0

## Ethnicity

	Sheltered			Unsheltered	Total
	Emergency	Transitional	Safe Haven		
Non-Hispanic/Non-Latino	166	46	0	182	394
Hispanic/Latino	17	3	0	9	29

## Race

	Sheltered	Unsheltered	Total
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Point In Time Summary for NC-509 - Gastonia/Cleveland, Gaston, Lincoln Counties CoC

	Emergency	Transitional	Safe Haven		
White	92	29	0	98	<b>219</b>
Black or African-American	81	17	0	89	<b>187</b>
Asian	0	0	0	0	<b>0</b>
American Indian or Alaska Native	3	0	0	2	<b>5</b>
Native Hawaiian or Other Pacific Islander	1	0	0	1	<b>2</b>
Multiple Races	6	3	0	1	<b>10</b>

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## Point-in-Time Summary Veterans for NC-509 - Gastonia/Cleveland, Gaston, Lincoln Counties CoC

Date of PIT Count: 1/29/2014

Population: Sheltered and Unsheltered Count

### Total Households and Persons

	Sheltered			Unsheltered	Total
	Emergency	Transitional	Safe Haven		
Total Number of Households	44	7	0	18	69
Total Number of Persons	45	7	0	19	71
Total Number of Veterans	44	7	0	18	69

### Gender

	Sheltered			Unsheltered	Total
	Emergency	Transitional	Safe Haven		
Female	7	6	0	0	13
Male	37	1	0	18	56
Transgender	0	0	0	0	0

### Ethnicity

	Sheltered			Unsheltered	Total
	Emergency	Transitional	Safe Haven		
Non-Hispanic/Non-Latino	44	7	0	18	69
Hispanic/Latino	0	0	0	0	0

### Race

	Sheltered			Unsheltered	Total
	Emergency	Transitional	Safe Haven		
White	30	4	0	9	43

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Point In Time Summary for NC-509 - Gastonia/Cleveland, Gaston, Lincoln Counties CoC

Black or African-American	14	3	0	8	<b>25</b>
Asian	0	0	0	0	<b>0</b>
American Indian or Alaska Native	0	0	0	1	<b>1</b>
Native Hawaiian or Other Pacific Islander	0	0	0	0	<b>0</b>
Multiple Races	0	0	0	0	<b>0</b>

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## Point-in-Time Subpopulations Summary for NC-509 - Gastonia/Cleveland, Gaston, Lincoln Counties CoC

Date of PIT Count: 1/29/2014

Population: Sheltered and Unsheltered Count

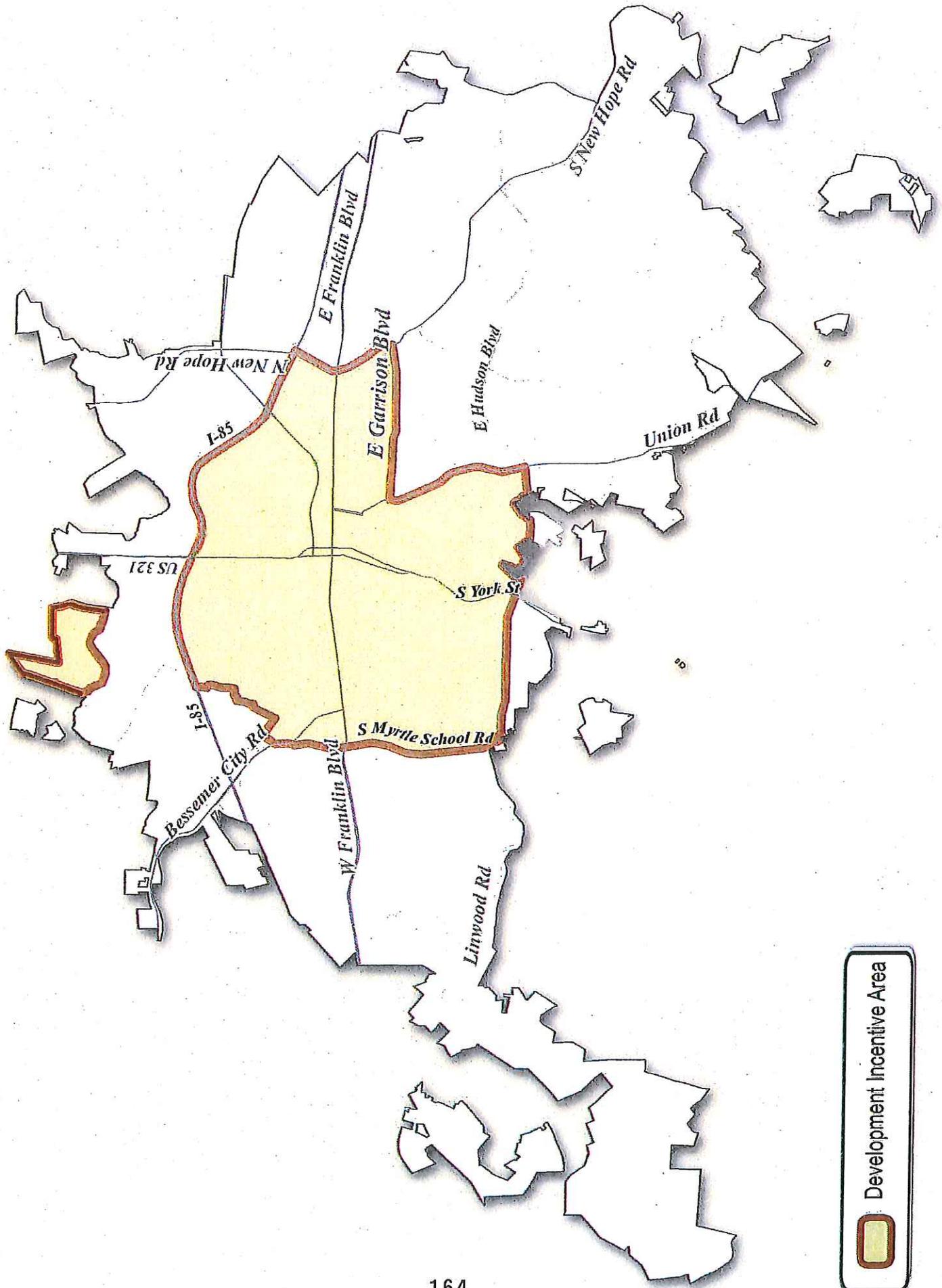
### Chronically Homeless Subpopulations

	Sheltered		Unsheltered	Total
	Emergency Shelters	Safe Havens		
Chronically Homeless Individuals	37	0	53	90
Chronically Homeless Families (Total Number of Families)	2		0	2
Chronically Homeless Families (Total Persons in Household)	4		0	4

### Other Homeless Subpopulations

	Sheltered		Unsheltered	Total
	Persons in emergency shelters, transitional housing and safe havens			
Adults with a Serious Mental Illness		44	51	95
Adults with a Substance Use Disorder		42	40	82
Adults with HIV/AIDS		1	1	2
Victims of Domestic Violence		67	34	101





[Home](#) | [Development Services](#) | [Engineering Services](#) | Water/Sewer Connections (System Expansion Fee)

## Water/Sewer Connections (System Expansion Fee)

 [Printer-friendly version](#)

To apply for Residential Water and Sewer connections, please visit City Hall, Customer Service, at 181 South Street on the first floor. For questions concerning residential water and sewer connections call 704.866.6716.

### **RESIDENTIAL CONNECTION - OUTSIDE INCENTIVE AREA**

Cost for typical residential connection for water only	\$2,189.60
Cost for typical residential connection for sewer only	\$1,437.00
Cost for typical residential connection for both water and sewer	\$3,303.50

### **RESIDENTIAL CONNECTION - INSIDE INCENTIVE AREA**

Cost for typical residential connection for water only	\$833.00
Cost for typical residential connection for sewer only	\$675.00
Cost for typical residential connection for both water and sewer	\$1,508.00

For more information on Water/Sewer Connections (System Expansion Fee) see the Quick Links box to the right.

#### **Contact Information:**

Garland Municipal Business Center  
150 S. York Street, Gastonia, NC 28052  
(PO Box 1748, Gastonia, NC 28053-1748)  
704.866.6022 (office)  
704.854.6654 (fax)

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**GASTONIA  
CONSORTIUM  
MAP**

**Municipalities Included:**

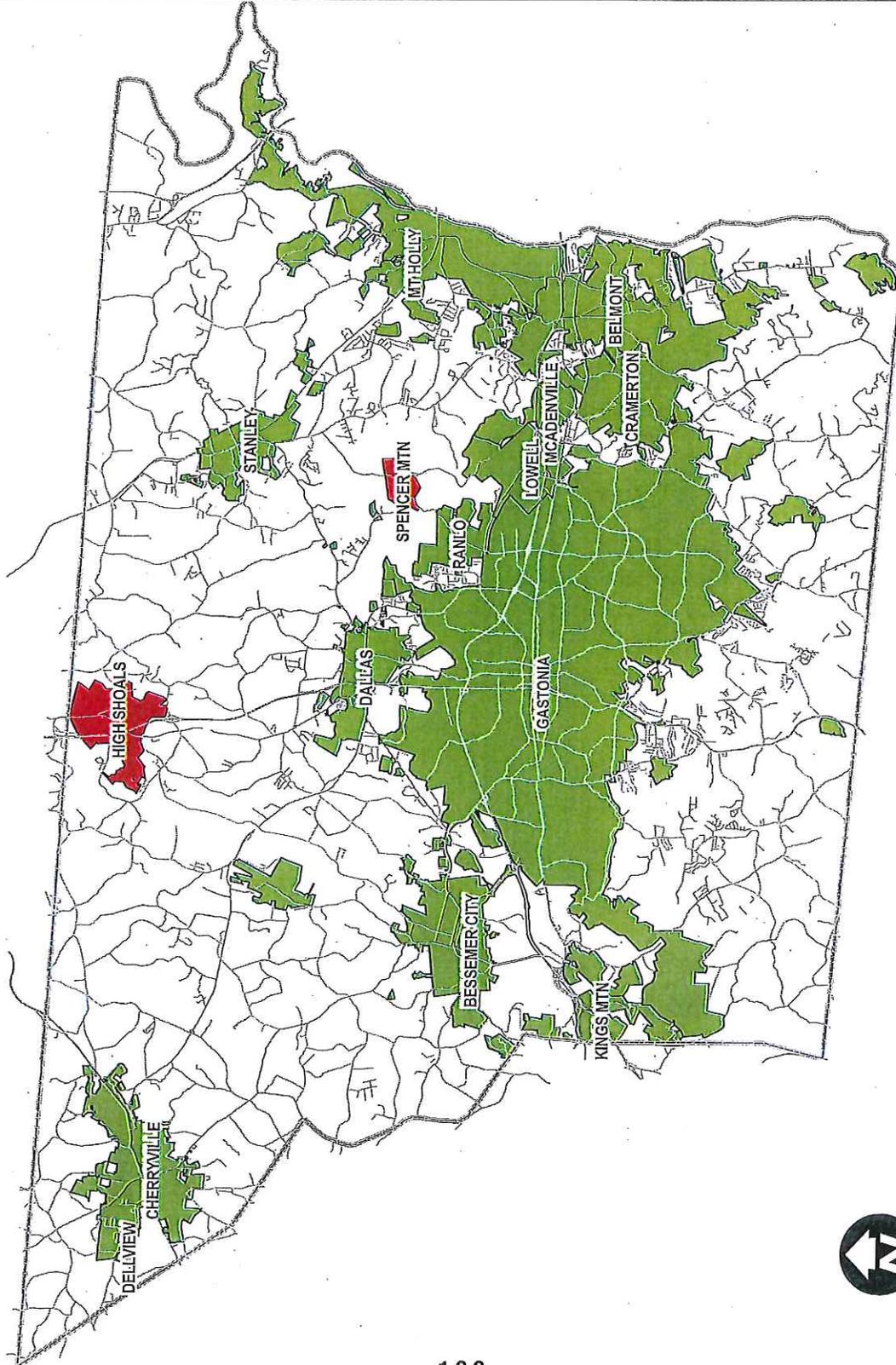


- Belmont
- Bessemer City
- Cherryville
- Cramerton
- Dallas
- Delview
- Kings Mountain
- Lowell
- McAdenville
- Mount Holly
- Ranlo
- Stanley

**Municipalities Not Included:**



- High Shoals
- Spencer Mountain



2.5 Miles



NOT TO SCALE