

Piecing it all
together
in your
community



PLAYING THE HOUSING GAME

**Learning to Use HUD's
Consolidated Plan
to Expand Housing
Opportunities for People
with Disabilities**



PREPARED BY the
Technical Assistance Collaborative, Inc.
Boston, MA

DECEMBER 1999

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INTRODUCTION

Did you know that there is money available to increase the amount of affordable housing in your community? And did you know that the disability community has both the right and the opportunity to be involved in deciding how this money is used? People with disabilities, their families, and advocates can get involved and influence these decisions through a process called the Consolidated Plan (ConPlan). This guidebook provides answers to key questions about this federally mandated housing plan, including: What is the ConPlan? How does it influence housing policies and federally funded housing activities in communities? And, most importantly, how can the disability community use the ConPlan process to expand housing opportunities for people with disabilities?



The ConPlan is a long-term housing plan that controls access to US Department of Housing and Urban Development (HUD) resources used to expand affordable housing opportunities. The ConPlan is intended to be a five-year comprehensive housing strategy that includes several pieces of key information. The ConPlan contains a housing needs assessment, which documents the need for affordable housing within in a state or community, and both a five-year comprehensive plan and a one-year action plan, which describe the activities that will be undertaken each year to address these needs.

HUD requires all states and localities that have already developed a ConPlan, to create a new plan during the year 2000 that covers the next five-year period. In order to ensure people with disabilities receive their "fair share" of federal housing resources, it is crucial the disability community be actively involved in the creation of their community or state ConPlan. Fortunately, the process used to develop these plans requires everyone to have the opportunity to participate and provide input, including people with disabilities and disability advocates. The information and approaches detailed in this guidebook will help the disability community participate in the ConPlan process, with the goal of expanding federally funded housing approaches for people with disabilities.

DEFINITIONS

While reading this guidebook you will note some technical terms will be used with which you may not be familiar. In order to facilitate the reader's understanding, these terms are defined below.

ConPlan Resources or ConPlan Funds

These terms are used interchangeably to refer to the HUD programs (i.e., Community Development Block Grant, Emergency Shelter Grant, HOME, and Housing Opportunities for People with AIDS), and the funds supporting these programs, that are directly controlled by the Consolidated Plan.



Localities

This term refers to a geographic area, such as a city, urban county, town, or community, and is used to differentiate this area from the state as a whole. Each HUD program controlled by the Consolidated Plan utilizes its own terminology to define the geographic area where the funds may be spent. For example, the HOME program uses the term "participating jurisdictions" to refer to cities with populations greater than 50,000 and urban counties with populations greater than 250,000 that receive federal HOME funding directly from HUD. The Community Development Block Grant (CDBG) program, uses "entitlement communities" to mean those communities or counties that, due to size and other HUD criteria, are eligible to receive CDBG funding directly from HUD.

For matters of convenience, this guidebook will use the general terms "state" or "locality" to define all those federally defined geographic areas that are required to submit a ConPlan in order to obtain any federal housing resources.

CITATIONS



Whenever possible, the laws or HUD documents that govern the ConPlan or related documents have been referenced in the main text, endnotes, or citations section of this guidebook. Many of the HUD regulations are found at Part 24 of the US Code of Federal Regulations (CFR) and are cited in the text as "24 CFR."

To obtain free copies of the Code of Federal Regulations including the HUD regulations, visit the HUD web site (<http://www.hud.gov>) or call HUD's Community Connections at (800) 998-9999 or your local HUD field office. You may also find copies of the regulations in the Federal Register at your local library.

CHAPTER 1: WHAT IS THE CONSOLIDATED PLAN?

The ConPlan could be considered the “master plan” for affordable housing in local communities and states. It is a community-based strategic planning document mandated by federal law and administered through the US Department of Housing and Urban Development (HUD). It is the community’s application to HUD for specific housing funds and is intended by law to be a **long-range planning document** that describes housing needs, market conditions, and housing strategies, including an action plan for the investment of federal housing funds.¹



The ConPlan is prepared by all states and certain local government jurisdictions—and approved by HUD—before these states and local governments can receive specific federal housing and community development funds from the HOME, Community Development Block Grant, Housing Opportunities for People with AIDS, and Emergency Shelter Grant programs.

In order to ensure that people with disabilities get their “fair share” of these federal housing resources, it is critically important that the disability community understands how the ConPlan process works in their community or state, and finds the most effective way to become involved. New federal housing resources targeted toward people with disabilities have declined significantly since 1995, including the Section 811 Supportive Housing Program for Persons with Disabilities. Thus it is important to pursue **all** federal housing programs, including those controlled by the ConPlan, to expand and enhance housing opportunities for people with disabilities.

Built into the ConPlan process are requirements for a substantial level of community input and public participation (these requirements are discussed further in Chapter 2). The law requires that a new ConPlan be prepared at least once every five years (although states and localities are permitted to revise their five-year ConPlan at anytime if housing needs, market conditions, or priorities change). Right now is the ideal time to get involved because most states and many communities across the nation will be **required** to develop a new ConPlan during the year 2000.

WHY SHOULD I CARE ABOUT THE CONPLAN?

The ConPlan is important to the disability community for three main reasons: 1) it controls how federal housing funds will be used to expand affordable housing; 2) it determines who will benefit from these affordable housing activities; and 3) the federal government is making it a key document by linking other HUD housing programs and strategies to it.

The ConPlan is your **best** chance to go on record about the housing crisis facing people with disabilities in your community or state. Most of the resources controlled by the ConPlan are specifically targeted to low-income households, including people with disabilities. People with disabilities are among the lowest income households in the country. The national average income of an individual with a disability receiving Supplemental Security Income (SSI) benefits is only 24 percent of the typical one-person income in the country.² People receiving SSI are too

poor to obtain decent and affordable housing unless they have the type of housing assistance controlled by the ConPlan and other federal housing programs.

Recent legislation and HUD policies have linked other HUD programs to the ConPlan, thus emphasizing its role as the "master" plan. Specifically, HUD has mandated that the ConPlan be linked to two other planning documents—the McKinney Continuum of Care and the new Public Housing Agency Plan. Due to the linkage between these housing plans it is extremely critical that the disability community understand all three plans, the relationships among them, and how they can get involved in their preparation. Chapter 3 provides more details on the other HUD housing plans.

WHO MUST SUBMIT A CONPLAN?

A unit of local government³ that receives any of the following program funding **directly**⁴ from HUD must submit a ConPlan:

- Community Development Block Grant Program (CDBG);
- HOME Investment Partnerships Program (HOME);
- Emergency Shelter Grant (ESG); and/or
- Housing Opportunity for Persons with AIDS (HOPWA).



Every state must also submit a ConPlan. The state ConPlan covers all communities within the state that do not qualify to receive these funds directly from HUD.

At the local level, the planning or community development department is usually responsible for coordinating the preparation of the ConPlan. At the state level, the state's housing agency (it may be called the Department of Community Affairs or Community Development, the state Housing Finance Agency, or the Department of Economic Development) develops the ConPlan.⁵

Not every state or locality that submits a ConPlan receives funding for all four programs listed above. In most cases, however, if a state or locality receives both CDBG and HOME program funds, the same department in the city or state government typically administers them.

WHAT KIND OF RESOURCES ARE CONTROLLED BY THE CONPLAN AND HOW CAN THEY BE USED?



As stated above, the four HUD programs controlled by the ConPlan include the:

1. HOME Program;
2. CDBG;
3. ESG; and
4. HOPWA.⁶

The amount of money that a state or locality receives for each program is determined by a formula based on the amount of funding appropriated by Congress each year. Appendix 1 provides the fiscal year 1999 allocations for each of these four HUD programs.

Decisions about how these four federal housing programs will be used are made during the ConPlan process. At the state and local level, a portion of CDBG funding, and all of the HOME and HOPWA funding, must be spent on affordable housing-related activities, including:

- housing rehabilitation;
- grants and loans for affordable housing development;
- down payments and other assistance to increase homeownership opportunities;
- tenant-based rental assistance (HOME and HOPWA); and
- emergency shelter or services programs for people who are homeless (ESG only).

All of these housing activities can benefit people with disabilities. For example, a portion of HOME program funding can be targeted for a rental assistance program for homeless people with disabilities or for homeownership activities that would benefit people with disabilities. People with disabilities can also benefit from CDBG grants and loans used to develop affordable housing by ensuring that some of the units are affordable and accessible to people receiving SSI benefits.

1. HOME Program

The federal government created the HOME Investment Partnerships Program in 1990.⁷ The HOME program is a formula grant of federal housing funds given to states and localities. During 1999, Congress appropriated \$1.6 billion that was distributed by formula to approximately 500 communities and states.

HOME funds can be used for the following housing activities:

- rental housing production and rehabilitation loans and grants;
- first-time homebuyer assistance;
- rehabilitation loans for homeowners; and
- tenant-based rental assistance (2 year renewable subsidies).

All housing developed with HOME funds must serve low- and very low-income individuals and families. For rental housing, at least 90 percent of HOME funds must benefit families whose incomes are at or below 60 percent of area median income; the remaining 10 percent must benefit families with incomes at or below 80 percent of area median income. (Your state or participating jurisdiction may have even lower income targeting for their HOME funds). 15 percent of a state or locality's HOME funds must be set-aside for use by community based non-profit organizations (called "CHDOs").

2. Community Development Block Grant (CDBG)

The Community Development Block Grant program⁸ is a federal grant provided to "entitlement communities" (typically municipalities with populations over 50,000 and urban counties with populations over 200,000) and to all states. States may use CDBG funds only in "non-entitlement communities," including rural areas.

During 1999, Congress appropriated \$4.75 billion for the CDBG program. At least 70 percent of CDBG funds must be used to benefit low- and moderate-income people by providing decent housing and a suitable living environment, and by expanding economic opportunities. CDBG can be spent on any of the following activities:

- housing rehabilitation (loans and grants to homeowners, landlords, non-profit organizations, developers);
- new housing construction (only if completed by non-profit groups);
- purchasing land and buildings;
- construction of public facilities, such as shelters for the homeless;
- construction of neighborhood service centers or community buildings;
- code enforcement, demolition, and relocation funds for people displaced because of CDBG projects;
- making buildings accessible to the elderly and handicapped; and
- public services (capped at 15 percent of a jurisdiction's CDBG funds) such as vocational services, healthcare, and childcare.

3. Emergency Shelter Grant (ESG)

Created with the authorization of the Stewart B. McKinney Homeless Assistance Act in 1987, the ESG program provides federal grants to states and localities based on the formula used for the CDBG program.⁹ Program funds are awarded to grantees in proportion to their previous year's CDBG allocation (see above). If a locality's allocation does not meet minimum grant standards, its funds are added to their state's allocation. Each year since 1996 HUD has allocated \$115 million in Emergency Shelter Grants. Eligible activities for use of ESG include:

- renovation, major rehabilitation, or conversion of buildings for use as emergency shelter;
- up to 30 percent on essential services for the homeless;
- up to 30 percent on homeless prevention efforts; and
- shelter operating costs, such as maintenance, insurance, utilities, rent, and furnishings (no more than 10 percent for operating staff costs).

4. Housing Opportunities for People with AIDS Program (HOPWA)

HOPWA is a HUD program that funds housing and services for people with AIDS¹⁰. HOPWA is available as a block grant to states and larger metropolitan areas based on the incidences of AIDS in these areas.¹¹ Approximately \$225 million was appropriated for HOPWA in Fiscal Year 1999. Eligible activities under the program include:

- housing information and coordination services;
- acquisition, rehabilitation, and leasing of property;
- project-based or tenant-based rental assistance;
- homeless prevention activities;
- supportive services;
- housing operating costs;
- technical assistance; and/or
- administrative expenses.

WHEN DO CONPLANS NEED TO BE COMPLETED?

Each ConPlan has a "program year" during which the state or locality implements the ConPlan annual one-year action plans. In an effort to better coordinate local planning, HUD allows each state and locality to decide when its program year begins. To find out what the program year and planning schedule is for the ConPlan process in your community, contact your local or state housing or community development officials. Most communities should begin the ConPlan process at least six months prior to the beginning of the new "program year." Given that most localities and states will have new ConPlans approved by HUD during the year 2000, it is particularly important for the disability community to get involved **NOW!**



WHAT IS HUD'S ROLE IN THE CONPLAN PROCESS?

The law that created the ConPlan gives states and localities the flexibility to develop plans that meet local needs. The current thinking of federal officials is that state and local officials—with good input from citizens and stakeholders—know how to best address the low income housing needs of their communities. The role of the federal government under this approach is to provide funding; mandate an inclusive planning process; review and approve/disapprove the planning documents; and then get out of the way.

Given this approach, it is not always clear who is responsible for monitoring the ConPlan process. Advocates for people with disabilities feel HUD should review the plans more critically. HUD officials have stated that it should be the disability community's role to monitor what is going on in their community and to notify HUD when there is a problem.

This confusion often leads to no one holding state and local governments accountable for the strategies and decisions reflected in the ConPlan. For example, the needs assessment of one state's ConPlan may indicate a large need for rental housing for people with disabilities, yet none of the strategies for using the ConPlan resources are targeted to address this need.

This confusion around monitoring, combined with the latitude given to the states and jurisdictions, has also resulted in many ConPlan processes being far from inclusive or open to the public. Some communities have been very open about the process and have made a real effort to seek public input and participation. Others have regarded the ConPlan as one more bureaucratic requirement from HUD, rather than a legitimate effort to identify and address priority housing needs. In these communities, disability advocates will have to work much harder to find out what is going on and may have more difficulty influencing the outcome.

CHAPTER 2: WHAT IS INCLUDED IN THE CONSOLIDATED PLAN?

Once the disability community understands the importance of the ConPlan, the next step is to learn as much as possible about the document itself and the process used to create it. In particular, it is important to understand what rights citizens, especially people with disabilities, have in influencing what the ConPlan actually says.

WHAT DO I NEED TO KNOW TO GET INVOLVED?

In order to have the biggest impact, the disability community should have a clear understanding of what the ConPlan must include (as required by HUD) versus what decisions are left up to the state or localities. The more you know about what information the ConPlan must include, the more successful you will be in influencing the decisions generated from it.¹² There are six required components to the ConPlan which are described below.



1. Description of the Planning Process—Citizen Participation and Consultation Requirements

The ConPlan process is based on the idea that state and local governments and citizens, rather than the federal government, should be empowered to make affordable housing and community development decisions for their community. In order to ensure that there is real community participation in the ConPlan process, the federal government sets out minimum requirements regarding citizen participation and consultation with public and private service providers.

The description of the planning process provides an overview of how the state or locality prepares the ConPlan, and in particular, how they have met the citizen participation and consultation requirements described below. All efforts made by the state or locality to broaden public participation in the ConPlan process should be described in this section. The disability community should review this section of the ConPlan, as well as the Citizen Participation Plan itself, carefully, and make sure people with disabilities and their advocates are able to meaningfully participate in the ConPlan process.

The Citizen Participation Plan

The Citizen Participation Plan is the “road map” for the ConPlan process. HUD requires that each state or locality spell out the process for citizens to participate in the preparation of the ConPlan. The Citizen Participation Plan must “provide for and encourage citizens to participate in the development of the Consolidated Plan and substantial amendments to the Consolidated Plan and performance reports.”¹³ The Citizen Participation Plan should include specific steps that will be taken to encourage the participation of all citizens, **including people with disabilities**. A state or locality should be judged on whether its Citizen Participation Plan is really inclusive and if it is followed. Appendix 2 includes a sample Citizen Participation Plan that describes an accessible and fair ConPlan process.

Consultation with public and private service providers

In addition to the Citizen Participation Plan, HUD requires that the local or state officials “consult with other public and private agencies that provide assisted housing, health services, and social services, including those focusing on...persons with disabilities”¹⁴ when preparing the ConPlan.

Unfortunately, the rules do not state at what point or even how this consultation is to be done. This lack of specificity can be a serious problem, especially if the officials preparing the ConPlan are unfamiliar with how health and social services systems are organized. For example, these officials may invite agencies representing only one disability group to a meeting, and then claim to have satisfied this ConPlan requirement.

Given that many HUD programs are designed to serve all people with disabilities rather than targeting one disability group, the disability community should work together to organize a clear strategy and message about the housing needs and housing preferences of all people with disabilities. With this approach, the disability community can take maximum advantage of this consultation requirement. By organizing in this way, the disability community becomes a more powerful force in the housing debate during the preparation of the ConPlan. Without this united approach, local or state officials can ignore organizations representing the interests of people with disabilities because they may not appear to represent a numerically significant or broad-based constituency.

2. Housing and Homeless Needs Assessment

The housing and homeless needs assessment describes the affordable housing needs within the state or locality. These estimates of need must be provided for several population groups including elderly people, single persons, large families, and people with disabilities. The housing needs information is provided for both renters and homeowners. The presentation is organized by income group in the following categories:

- extremely low income (between 0 and 30 percent of area median income);
- low income (between 30 percent and 50 percent of area median income);
- moderate income (between 50 percent and 80 percent of area median income); and
- middle income (between 80 percent and 95 percent of area median income).

There is also a separate section devoted to homeless persons, and a section that discusses the need for supportive housing for non-homeless people, including: the elderly; frail elderly; people with disabilities (mental, physical, and developmental); persons with alcohol or other drug addictions; persons with HIV/AIDS; public housing residents; and any other categories the state or locality may specify.

The needs assessment is a critically important part of the ConPlan because it should determine which population groups would be given a high priority for housing assistance. The disability community should not wait to be asked by housing officials to provide housing needs data for the ConPlan. Rather, it should be proactive in collecting and providing this information to state or local officials, and should ensure that these data are included in the final plan sent to HUD. To have the greatest impact, data on the housing needs of people with disabilities should be offered to staff preparing the ConPlan **as early as possible** in the process so it is factored into decisions about the ConPlan’s priorities and housing strategies.

Homeless and supportive housing needs

The housing needs assessment in the ConPlan is divided into several categories, including separate sections for homeless people and people in need of “supportive” housing. Many ConPlans limit their discussion of the housing needs of people with disabilities to these two categories, and make the erroneous assumption that all people with disabilities are either homeless or are in need of housing defined as “supportive” by HUD. City and state staff preparing the ConPlan need to be informed that there are many people with disabilities who simply need a decent and affordable place to live or who need affordable housing that is more accessible. These “mainstream” housing needs of people with disabilities are often overlooked by housing officials in the ConPlan narrative.

3. Housing Market Analysis

The housing market analysis is a discussion of the significant characteristics of the housing market, including the supply, demand, condition, and cost of housing. It also contains an inventory of affordable housing, including transitional facilities for homeless and supportive housing. The discussion of the housing market should also describe the barriers to developing, maintaining, or improving affordable and accessible housing, including current tax policies, zoning ordinances, **and any expected loss of affordable housing from the current inventory.**

The disability community should pay particular attention to whether or not the ConPlan provides a discussion of the affordable housing units lost to people with disabilities due to the implementation of “elderly only” policies in federal housing developments in the community. Often, the loss of access to these units by people with disabilities has not been documented and is overlooked in the housing market analysis.

In many communities across the nation, housing contracts between HUD and private housing developments are ending. The owners of these developments are not required to renew these contracts. By “opting out” of the HUD contract, the owner is no longer required to provide affordable housing and may ask for higher rents, rents comparable to the general market. In many communities, these opt outs are resulting in a dramatic loss of affordable housing that was once available to people with disabilities. It is important that this loss of affordable housing also be documented in the housing market analysis of the ConPlan.

Other important factors that should be part of the analysis of the housing market include:

- the cost of housing as compared to the extremely low incomes of people with disabilities;¹⁵
- restrictive zoning that makes the development of affordable rental housing difficult;
- the comparability of HUD’s Fair Market Rent level¹⁶ in the community as compared to the income level of people with disabilities;
- the substandard conditions of much of the housing that is considered affordable; and/or
- the location of affordable housing in unsafe or isolated neighborhoods.

4. Development of a Five-Year Strategic Plan

The five-year strategic plan outlines the strategies that a state or locality will use to meet the priority needs for affordable housing and community development identified in the ConPlan. The categories of activities that must be included in the strategic plan are: (1)

affordable housing; (2) homelessness; (3) other special needs (non-homeless), including people with disabilities; and (4) community development activities other than housing.

Officials preparing the ConPlan must “indicate the priorities for allocating investment”¹⁷ and “describe the basis for assigning the priority”¹⁸ to each category of need. Despite these instructions from the federal government, this part of the ConPlan process frequently does not work for the disability community. Even with clear evidence of the affordable housing needs of people with disabilities (i.e., their extremely low incomes, documentation of the significant loss of affordable housing due to “elderly only” tenant selection policies, and so on), many communities do not give high priority to housing strategies that will benefit these constituents.

In other words, the ConPlan fails to require an adequate and enforceable link between the needs identified in the ConPlan and the proposed investment of housing dollars. Unfortunately, despite the efforts of affordable housing advocates, the current policy at HUD is to give maximum deference to states and localities in determining their own needs and responding to these needs as they see fit. An important question for the disability community to resolve with the locality, and perhaps HUD, is the point at which local flexibility becomes discrimination. While it is clear that the current level of HUD funding is not sufficient to meet all of the affordable housing needs in any community, it is also clear that people with disabilities should benefit from federal housing funding in proportion to their priority housing needs as identified in the ConPlan. **The disability community should approach local and state officials and HUD if the affordable housing needs of people with disabilities are consistently overlooked when allocating the resources controlled by the ConPlan.**

Despite the shortcomings of the ConPlan, there are still many opportunities for the disability community to work to ensure that the ConPlan does include housing strategies that are responsive to the housing needs and housing preferences of people with disabilities. Consistent pressure from the disability community will, in the long run, be a more effective strategy than expecting HUD’s involvement to make a difference. These strategies will be discussed further in Chapters 4 and 5.

5. Development of a One-Year Action Plan

The one-year Action Plan is a detailed description of how the federal funds available during the next 12 months (i.e., the program year) will be spent consistent with the strategies outlined in the five-year plan. The Action Plan includes a specific breakdown of the number and type of families that will benefit, the specific local housing activities that will be undertaken, and the geographic areas in which the community will direct federal housing assistance.

The ConPlan Action Plan is a blueprint the disability community can use to evaluate whether or not any federal housing money controlled by the ConPlan is being spent on housing activities that will benefit people with disabilities. In order to get a true picture of an area’s efforts over time, the disability community should look at the annual Action Plans for the past several years in addition to the most recent 12-month period. The disability community can then determine whether the amount allocated to housing activities benefiting people with disabilities appears to be a reasonable or a “fair share” of the funding available over time.

6. Analysis of Impediments to Fair Housing Choice

The ConPlan requires states and localities to sign legally binding certifications to HUD every year, including one stating that the community will “affirmatively further fair housing goals...and maintain records pertaining to carrying out this certification.”¹⁹ This means the state or locality must identify impediments to fair housing choice, and take appropriate action to overcome the effects of these impediments. This is a component of the ConPlan that may be particularly helpful to people with disabilities. Specifically, the impediments analysis must include:

- An in-depth examination of a state or locality’s laws, regulations, policies and procedures;
- An evaluation of how these laws, etc. impact the availability and accessibility of housing;
- A review of all conditions that affect housing choices; and
- An assessment of the availability of affordable housing units in a variety of sizes and locations.²⁰

Two of the fundamental impediments to fair housing choice for people with disabilities are their extremely low incomes and housing discrimination. A comprehensive impediments analysis should identify these facts as barriers that people with disabilities face when trying to locate and access affordable housing.

States and localities must also certify in the ConPlan that all federal housing program activity is in compliance with the Fair Housing Act and Section 504 of the Rehabilitation Act of 1973. These laws both require the community to provide “reasonable accommodation” to people with disabilities during the ConPlan process if requested. Such accommodations might include providing written notice of public hearings to organizations representing people with disabilities, or perhaps providing a training session on the ConPlan process or federal housing programs. The disability community should not hesitate to request these or other accommodations if it will help to make the ConPlan process more accessible to people with disabilities.

REPORTING ON PERFORMANCE

In addition to the ConPlan itself, HUD requires a state or locality to report annually on the progress it has made in carrying out its strategic plan and its action plan. These performance reports are submitted to HUD within 90 days after the close of the program year. The performance report can help the disability community determine who is actually benefiting from the federal housing funding available to the community. The performance report should indicate the number and types of families served by income level.



The disability community should pay close attention to these statistics, particularly the information regarding extremely low-income households. These are the households whose incomes are below 30 percent of median income, which includes virtually all individuals with disabilities who receive SSI benefits. These statistics can help determine whether federally funded housing activities are creating affordable housing opportunities for people with disabilities.

SUBSTANTIAL AMENDMENTS

The law that governs the ConPlan process requires that **any** major changes, or “substantial amendments,” made to any part of the ConPlan must be managed via the Citizen Participation process. Each state and locality must clearly state in its Citizen Participation Plan what types of modifications will be considered “substantial amendments.” This includes any changes made to the one-year action plan, the comprehensive five-year strategic plan, or the Citizen Participation Plan. In accordance with the public participation requirements, changes to these documents can only be made after the public has been given the opportunity to review and comment on the proposed modifications.



Neither the law nor HUD guidance clearly defines what a “substantial amendment” is. HUD gives states and localities the authority to decide what changes would qualify as amendments. However, HUD regulations do specifically identify the following amendments:

- A change in the priorities for spending [ConPlan] money;
- A change in the purpose, scope, location, or beneficiaries of an activity;
- A decision to carry out an activity not previously described in the Annual Action Plan; and
- A change in the way [ConPlan] funds are distributed to various parts of the state or county.²¹


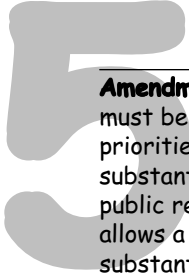
It is important to note the above amendments may not qualify as “substantial” in some states and localities, and therefore it is only required that the public be notified **after** the change has been made.

The importance of this requirement should not be underestimated. Substantial amendments provide a valuable opportunity for the disability community to influence the content of the ConPlan or planning process, even after it has been submitted and approved by HUD. Given this, it is critical that the disability community proactively engage the officials in a dialogue around developing a clear definition of changes that constitute “substantial amendments.” The sample Citizen Participation Plan in Appendix 2 provides some examples of these types of changes.


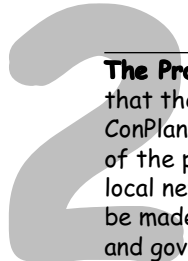
THE FIVE STEPS OF THE CONPLAN CALENDAR




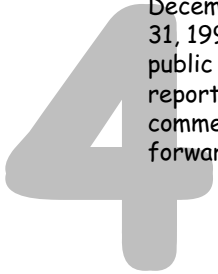
Identifying Need — The law requires public hearings on housing and community development needs and requires that these hearings take place before the proposed ConPlan is published for public comment. This is the time to provide public testimony on the housing needs of people with disabilities and the time for the disability community to actively engage local housing officials on the housing strategies that would benefit people with disabilities. Consultation with public and private services providers could also occur during the needs assessment process.




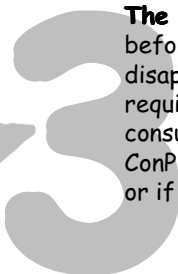
Amendments to the ConPlan — The ConPlan must be amended if there are any changes in priorities or uses of money. If there is a substantial amendment, some process for public review and comment is required. HUD allows a jurisdiction to decide what is a substantial change. The disability community should be prepared to request an amendment to the ConPlan if it is determined that the strategies and the action plan do not benefit people with disabilities at all. It is important to remind the local officials that HUD permits ConPlan amendments at any time, provided the correct process is followed.



The Proposed ConPlan — HUD requires that the jurisdiction publish the proposed ConPlan for citizen's comment. A summary of the proposed plan must be published in local newspapers, and completed copies must be made available to the public at libraries and government offices. In addition, the jurisdiction must provide a reasonable number of free copies of the plan to citizens and groups that request it. The public must have at least 30 days to review and provide written or oral comments on the proposed ConPlan. A summary of any comments or views offered, but not accepted, and the reasons for their rejection, must be included in the final ConPlan sent to HUD.



Annual Performance Report — These reports must be submitted to HUD within 90 days after the close of the "program year." (For example, if a jurisdiction's program year is January 1, 1997 through December 31, 1997 the report for that time period is due by March 31, 1998.) Annual Performance Reports must be available to the public for review and comment on at least 15 days before the report is sent to HUD. The jurisdiction must consider people's comments and attach a summary of them to the report when it is forwarded to HUD officials.



The Final ConPlan — The final ConPlan is due at HUD 45 days before the start of the jurisdiction's "program year." HUD can disapprove the final ConPlan if the citizen participation requirements were not followed, if social service agencies were not consulted, if any of the certifications were not accurate, if the ConPlan does not meet the "purposes" of the CDBG or HOME laws, or if the plan fails to satisfy all of HUD's requirements.

CHAPTER 3: WHAT ABOUT ALL THOSE OTHER HUD HOUSING PLANS?

The housing needs and strategies adopted in the ConPlan are also intended to influence the development of two other HUD mandated strategic plans—specifically the Continuum of Care Plan which guides the use of HUD McKinney Homeless Assistance Programs and the new Public Housing Agency Plan prepared by Public Housing Agencies.

MCKINNEY CONTINUUM OF CARE HOMELESS ASSISTANCE

Since the mid 1990s, funding for HUD's homeless programs has been made available through the Continuum of Care approach—that is a local or statewide network or system designed to coordinate efforts to address homelessness. The Continuum of Care approach is intended to help communities develop the capacity to envision, organize, and plan comprehensive and long-term solutions to address the problem of homelessness in their community. Like the ConPlan, this comprehensive approach encourages communities to prioritize gaps in the housing and services available for homeless people and develop long-term strategies and action plans to address these gaps using HUD McKinney funds. There are three HUD McKinney programs (Supportive Housing Program, Shelter Plus Care, and Section 8 Mod Rehab SRO) available through the McKinney Homeless Assistance national competition announced each year in HUD's Notice of Funding Availability (known as the HUD SuperNOFA).



Supportive Housing Program (SHP)

The Supportive Housing Program provides supportive housing and/or services to homeless people. SHP funding can be used to create transitional housing (temporary housing and services for up to 24 months), create permanent supportive housing for people with disabilities, or provide supportive services not in conjunction with SHP-funded housing.²²

Shelter Plus Care (S+C)

The Shelter Plus Care program provides rental assistance funding for homeless people with disabilities. This program serves primarily those people with mental illness, chronic problems with alcohol and/or drugs, and AIDS or related diseases. The rental assistance funds are matched by supportive services funding provided by the grantee.²³

Section 8 Moderate Rehabilitation Program for Single Room Occupancy (SRO) Dwellings for Homeless Individuals

The Section 8 SRO program provides rental assistance in the development of Single Room Occupancy Dwellings (SROs) for homeless individuals. SRO projects are awarded Section 8 project-based rent subsidies for up to 10 years—a long-term commitment that helps the project sponsor obtain other financing necessary to develop the project.²⁴

The McKinney Continuum of Care Homeless Assistance approach is directly linked to the ConPlan. In fact, according to the HUD 1999 McKinney Continuum of Care application kit, each project funded by HUD through the McKinney Continuum of Care planning process is required to submit certification that it is consistent with the ConPlan for that area. It is possible that future HUD policies and regulations will strengthen this linkage between the ConPlan and the HUD Continuum of Care approach.

PUBLIC HOUSING REFORM AND THE PUBLIC HOUSING AGENCY PLAN

Public Housing Reform

For many years the federal government has debated what to do about public housing—and the Public Housing Agencies (also referred to as Public Housing Authorities) that run it. This question has been answered, at least for now, by new public housing reform legislation enacted in 1998. Continuing the federal policy that local and state officials—not HUD—know best how to use federal housing funds in the communities, the goal of public housing reform is to give Public Housing Agencies (PHAs) more flexibility and control over how federal public housing and Section 8 funds are used. For example, local officials can decide to direct more Section 8 funding to households with higher incomes who are saving to purchase a home or they can create a preference for very low-income people with disabilities, or both.



Public Housing Agency Plan

Along with this flexibility and control came new requirements, including the creation of a new five-year comprehensive document known as the Public Housing Agency Plan (PHA Plan).²⁵ In the year 2000, each PHA will be required to complete a PHA Plan that describes the agency's overall mission for serving low-income and very low-income individuals and families, and the activities that will be undertaken to meet the housing needs of these households.

In the past, the resources controlled by the PHA Plan, specifically federal public housing and the Section 8 rental assistance programs, were highly regulated by HUD. These programs were initially intended to provide affordable housing to the lowest income households, including many people with disabilities. They are HUD's major programs for assisting these households to rent decent, safe, and sanitary housing in the community. Section 8 and public housing allow people with limited incomes to obtain housing without spending the majority of their income on rent. The new PHA Plan will be used by PHAs to describe their strategies for using these resources to address the needs of low-income and very low-income people, including people with disabilities. For example, a PHA will be required to state in its PHA Plan if it will designate any of its public housing units as "elderly only" or if it will apply for any Section 8 Mainstream funding targeted to people with disabilities.

In consultation with a newly-created Resident Advisory Board, each PHA will be developing their first PHA Plan during 2000, including a statement on the housing needs of low- and very low-income people in the community and how the PHA will meet those needs. When federal officials created the PHA Plan they also linked it to the ConPlan. According to HUD's PHA Plan Interim Rule, "the PHA must ensure that its Annual Plan is consistent with the Consolidated Plan for the jurisdiction in which the PHA is located."²⁶ Specifically, the needs, goals, and activities detailed in the PHA Plan must reflect the needs and priorities documented in the ConPlan. In fact, PHAs can use the data provided in the ConPlan to develop the PHA Plan, rather than conducting their own needs assessment for the community.

What does this all mean for people with disabilities and their housing advocates? Disability advocates are very concerned that the link between the ConPlan and the PHA Plan will mean that people with disabilities will have less—not more—access to affordable housing in local communities. There are valid reasons for concern because most ConPlans do not accurately describe the acute housing crisis experienced by people with disabilities. Unfortunately, many state and local ConPlans contain inaccurate or incomplete data, particularly with regard to the housing needs of people with disabilities. Housing strategies in the ConPlan often do not address the housing needs of people with disabilities. With future funding for housing at stake, it is critically important that the housing crisis confronting people with disabilities be accurately described in both the ConPlan and the PHA Plan. Given the linkage between the PHA Plan and the ConPlan it is possible that if the needs of people with disabilities are not reflected in the ConPlan they will also be overlooked in the PHA Plan.

CHAPTER 4: HOW CAN THE DISABILITY COMMUNITY GET INVOLVED?

The ConPlan process is meant to be comprehensive and tailored to meet housing needs at the local level. It is an invaluable mechanism for both documenting the housing crisis facing people with disabilities and accessing federal housing resources. In order to be an active participant in the process, the disability community needs to:

- ☞ **Get organized** and have a clear and singular message about the different types of housing needed by people with disabilities as well as their housing preferences;
- ☞ **Learn the basics** of the ConPlan process including how HUD housing dollars (i.e., CDBG, HOME, ESG, and HOPWA funds) can be used, and how to get involved before decisions on housing strategies are actually made;
- ☞ **Actively participate** in the ConPlan process and react to all critical documents;
- ☞ **Document the need** for affordable housing among people with disabilities;
- ☞ **Analyze the housing market** by gathering accurate data regarding the current housing market. This includes an inventory of available housing resources;
- ☞ **Identify all barriers** to accessing affordable housing people with disabilities face; and
- ☞ **Develop strategies** that work and specific proposals for how ConPlan resources can be used alone, or in partnership with other federal programs, to successfully expand housing opportunities for people with disabilities (discussed in Chapter 5).

GET ORGANIZED

Because most HUD programs are targeted to **all** people with disabilities, it is important that providers and advocates serving people with all types of disabilities come together to develop an overall strategy for engaging local or state housing officials in the entire ConPlan process. These efforts should include the identification of specific and realistic strategies for the use of federal housing funds to benefit **all** people with disabilities.

Organizing the disability community to get involved in the ConPlan takes time and effort. Communities undertaking this should allow themselves the time to lay the right groundwork in terms of community process, data collection, and analysis. This will earn community buy-in and translate into material improvements in the disability system and the lives of people with disabilities.

The disability community could form a *Core Working Group* with an overall focus on expanding affordable housing opportunities, specifically through involvement in the development of the ConPlan. The group should develop a mission statement and identify goals, objectives, and action steps—such as reviewing the past ConPlans for the community or providing comments on the ConPlan draft at the public hearing—to accomplish these goals.



The working group should be as inclusive as possible, ensuring that essential consumers, providers, and other powerful stakeholders (e.g. business leaders, public officials, service provider networks, housing agencies) are engaged in the process from the beginning to maximize the level of involvement and legitimacy. Much of the success of the efforts will rest on the cooperation of policy makers and funders. If these stakeholders are not directly involved, they should be kept aware of the planning process and progress.

These organizing efforts should be conducted in the context of other related community planning activities, in particular the Continuum of Care and the development of the new PHA Plan. This is to ensure that priority activities and strategies in other housing plans are consistent with the Core Working Group's objectives.

LEARN THE BASICS

After developing a clear and singular message, the next step to getting involved in the ConPlan process is to have a picture of how the process works for your community or area. First, the disability community should find out if your local government receives federal housing funding directly from HUD and is required to have a ConPlan. It is important to find out who has the lead role in preparing the ConPlan and developing the schedule for the process. This can be done by calling the Chief Executive of the community or the planning/community development department of the local government. If the community does not have a ConPlan then contact the state's housing and/or community development department in order to get involved.



The disability community should also make sure to get a copy of the most recent ConPlan from these state or local officials. They should become familiar with both the content and the format of the ConPlan. The critical pieces of information to find out are:

- the ConPlan "program year;"
- when the next plan will be prepared;
- the schedule for public hearings; and
- the consultation requirements.

The public is entitled to access **all** information relevant to the ConPlan. It is important to make sure that you receive a **complete** copy of the ConPlan since often housing officials only distribute select sections, such as a list of projects that were funded in the past using ConPlan resources. HUD requires that a copy of the complete ConPlan be made available to the public, free of charge, within two working days of a request.

Access all Relevant Information

Through the ConPlan process, HUD requires that housing officials not only listen to the needs of the community, but also respond to those needs, and be accountable for their actions. This accountability is the foundation for many of the HUD requirements around public participation, including the public's access to information.

According to the law that created the ConPlan, the public must be given “reasonable” and “timely” access to all key information and records. This could include information such as data regarding how the ConPlan resources have been spent in the past or how it will be spent in the future. For past activities, the law limits the public’s access to these records to the past five years.

Unfortunately, HUD allows states and localities to decide how these documents will be made available to the public, and therefore the needs of people with disabilities may be overlooked. However, HUD does state that all key information and records must be made available “in a form accessible to persons with disabilities, upon request.”²⁷ The disability community should use this HUD regulation to ensure that people with disabilities are truly able to access ConPlan information. For example, copies of the ConPlan and the Citizen Participation Plan should be made available in facilities that are accessible by people with physical impairments.

Review the documents

The law that mandates the creation of the ConPlan also requires that officials developing the plan “notify” the public that information is available and allow citizens to “examine” the document so they may provide informed feedback. This requirement applies to almost all documents related to the ConPlan including:

- the five-year comprehensive document;
- the one-year Action Plan;
- the annual performance reports;
- the Citizen Participation Plan; and
- any substantial amendments made to the ConPlan.

Unfortunately, although the law requires that the public be notified about the ConPlan and be allowed to review it, housing officials developing the plan are given latitude to determine how the public will be notified, when, and how they will distribute copies of the documents to the public.

Get a copy of the Citizen Participation Plan

According to HUD regulations, a critical part of the ConPlan process is active input and feedback from the community, including people with disabilities. In the winter of 1999, HUD re-emphasized the importance of the involvement of the disability community in the ConPlan process through a memo from the HUD Secretary to all HUD Field Offices²⁸ that stated:

It is critical that persons with disabilities and their housing needs be fully considered in every jurisdiction we serve. To do so, we must reach out to persons with disabilities and their chosen advocates and hear their perspectives. I want to remind you that each jurisdiction is required to (1) include persons with disabilities in the Consolidated Plan development process and (2) include data regarding housing needs of persons with disabilities.

One of the first steps the disability community should take is to carefully analyze the Citizen Participation Plan since it describes the overall process for developing the ConPlan and is a key element for determining when, where, and how the disability community can be involved. First, contact officials in the housing or community development departments in

your community and request a copy of the Citizen Participation Plan. This document should be readily available and a limited number of copies should be free of charge. Make sure that the copy of the Citizen Participation Plan is complete and does not just provide excerpts. Appendix 2 provides a sample Citizen Participation Plan.

Second, the Citizen Participation Plan should be reviewed to ensure that the ConPlan process is **truly** accessible to people with disabilities and is in accordance with the required timeline. For example, are public hearings broadly advertised? Are they held in wheelchair-accessible facilities and are interpreters available when needed? Is there an easy process for requesting a draft copy of the Consolidated Plan made available in different formats, such as in large print, if needed? If the Citizen Participation Plan does not describe a planning process that is truly accessible to people with disabilities, but rather one that barely meets HUD requirements, arrange a meeting with local officials to discuss your concerns. At the meeting suggest specific reasonable accommodations that could be made to ensure more participation by the disability community. For example, the disability community could require that written notice of all ConPlan activities be mailed to non-profit disability organizations and service providers.

Obtain and review ConPlan performance reports

As mentioned earlier, in addition to developing the actual ConPlan, HUD requires each jurisdiction to report annually on the progress it has made in carrying out the activities laid out in its strategic plan. These performance reports can help the disability community determine who is actually benefiting from the federal housing funding provided by HUD. The report should indicate the number and types of families served by income level, including extremely low-income, very low-income, low-income, moderate-income, and middle-income households.

People with disabilities, their advocates, and families should get a copy of recent ConPlan Performance Reports and ask for assistance, if necessary, in understanding the housing activities that have been paid for with federal housing funds. Pay close attention to the statistics included in the performance reports, particularly the information regarding extremely low-income households, which represents virtually all people with disabilities receiving SSI benefits. These statistics can help determine whether the jurisdiction's federally funded housing activities are creating affordable housing opportunities for people with disabilities with very low incomes.

PARTICIPATE AND REACT

Before the ConPlan can be finalized, the law requires that the community have a chance to review the draft plan and comment on it. A limited number of free copies of the draft must be made available in public settings, such as libraries and government offices. Also, the law requires that the draft plan be made available in locations and formats that are easily accessible by people with disabilities. Some examples of ways to ensure that the draft ConPlan is accessible to people with disabilities include distributing copies in wheelchair-accessible buildings or making alternate versions of the draft Plan available, such as in Braille.



After the public reviews the ConPlan draft, they are given the opportunity to make public comments both in writing and at a public hearing. HUD requires each state and locality that completes a ConPlan to describe in the Citizen Participation Plan the policies for receiving and processing written and oral comments from the public regarding: the content of the ConPlan, the overall ConPlan process, or the Annual Performance Report.

Submit Written Comments

HUD requirements say, that at a minimum, every written complaint must be answered with a "timely" and meaningful written response, and that all comments must be "considered" by officials. A summary of all comments must be included as a part of the final submission to HUD. If the state or locality receives CDBG funds, then "timely" is defined as 15 working days.

HUD leaves a lot of discretion to the officials developing the ConPlan to define what a "meaningful" response is and how to deal with oral complaints. The disability community should not be discouraged by this fact since HUD procedures emphasize the importance of **all** comments and complaints. In fact, HUD requires its Field Office staff to review a summary of all comments and complaints before determining whether the ConPlan is complete.

Attend Public Hearings and Give Feedback

In order to solicit feedback from the community regarding the content of the ConPlan, the planning process requires that the housing officials developing the plan hold public hearings. It is at these hearings that citizens from the community are given the opportunity to comment on the various parts of the ConPlan including its content or the planning process itself. These public hearings provide a critical opportunity for the disability community to make an impact on public officials present since comments made during the public hearings are recorded and required to be submitted to HUD as part of the final plan.

The law regarding ConPlan public hearings states that they must be held throughout the ConPlan process. Specifically, the public must be able to provide information and comment on:

- the housing and community development needs in the community;
- the proposed activities to be funded with the ConPlan resources; and
- the performance of the state or locality using the ConPlan funds.

The regulations also allow the states and localities to limit the public hearings to only one (for states) or two (for localities) throughout the process.

Even though the regulations allow states and participating jurisdictions to limit the number of public hearings, the disability community should maximize this opportunity to give feedback and testimony regarding the housing crisis facing people with disabilities and the role of the state and local housing officials in addressing their needs. Unfortunately, in practice, many officials lump together a public hearing on last year's performance with next year's activities. By doing this, the officials spend only a limited time on each topic and create so much confusion that the public is discouraged from participating. Thus, the disability community needs to try hard to convince the housing officials to provide additional public hearings at different stages in the planning process and to encourage a clear focus and agenda for each hearing.

Regardless of how many public hearings there are, the disability community should prepare for the hearings and plan to have a number of individuals speak. Specifically, the disability community should make sure to:

- state the housing needs of people with disabilities clearly;
- comment on the past performance of the state or locality in funding activities that address these needs; and
- make specific recommendations for how to use ConPlan funds to expand housing for people with disabilities.

Utilize the “Substantial Amendments” Requirement

As described in Chapter 2, substantial amendments are those changes made to the ConPlan that are large enough in scope that they require public feedback before implementing. These amendments provide an invaluable opportunity for the disability community to influence the content of the ConPlan even **after** it has been submitted and approved by HUD. Also discussed earlier was the latitude given to states and localities in defining which changes constitute “substantial” modifications, thus enabling them to limit the input from the public when making certain types of changes.

There are two ways the disability community can utilize the “substantial amendments” requirement of the Consolidated Plan. First, disability advocates should encourage housing officials to use a broad definition when defining which changes to the ConPlan would be considered “substantial” enough to require community input. Some examples of substantial amendments that would help the disability community influence the ConPlan include:

- a change in the type of people benefiting from an activity including changes in income levels, race or ethnicity, or size of household;
- a decrease in the number of people with disabilities benefiting from ConPlan activities; or
- a decrease in the number of extremely low- or low-income people benefiting from ConPlan activities.

Second, the disability community should request a substantial amendment to the ConPlan if it does not meet all the HUD requirements. For example, if a ConPlan does not provide any information on the housing needs of homeless people, misrepresents the housing needs of people with disabilities, or otherwise discriminates against people with disabilities, **and** the ConPlan has already been finalized and approved by HUD, the disability community should seek a substantial amendment to the ConPlan. To do this, the disability community should meet with the officials who developed the ConPlan, present with them with the complaints in writing, and provide ways the ConPlan could be modified. The disability community may need to seek HUD’s assistance if these officials are uncooperative and unwilling to make the necessary changes.

File Complaints with HUD

Over the years, low income housing advocates and advocates for people with disabilities have been concerned that the ConPlan does not require local housing officials to address the most urgent housing needs in local communities and have expressed these concerns to HUD

and to Congress. However, despite the urging of these advocates and people with disabilities, HUD rarely disapproves a ConPlan submitted for its approval even if there have been complaints or negative comments submitted.

Unfortunately, HUD officials are likely to use their power to disapprove a ConPlan only when strong evidence is produced as to why disapproval is necessary. It is important that the disability community carefully review the testimony given at the public hearings, the consultation process with public and private service agencies, and the responses of housing officials to citizens' comments that were **not** taken into consideration during the process. It is also important to review and document the jurisdiction's "track record" on housing for people with disabilities over several years, rather than for a one- or even two-year period.

If local housing officials consistently refuse to consider the housing needs of people with disabilities year after year, then there may be sufficient evidence to attract HUD's attention. Currently there is no formal process for filing a complaint regarding the ConPlan (or related documents) with HUD. The disability community should feel free to submit a complaint nonetheless. Do not be afraid to raise these issues with HUD. Write to the HUD Secretary's Representative and express your concerns. Make sure to send a copy of the complaint to the HUD Office of Fair Housing and the Senior Community Builder in the local HUD Field Office. Without the disability community's willingness to document and call attention to the problem, HUD will never know a problem exists. It is surprising how many communities decide to cooperate once HUD is involved.

DOCUMENT THE NEED

The housing and homeless needs assessment section of the ConPlan describes the affordable housing needs within the jurisdiction. For the ConPlan, these estimates of need must be provided for several population groups, and be organized by income group. The needs assessment is a critically important part of the ConPlan because it **should** determine which population groups (among the many eligible for HUD programs) will be given a high priority for housing assistance.



As stated earlier, the disability community should pay close attention to the data included in the ConPlan needs assessment, particularly the information regarding extremely low-income households which includes virtually all individuals with disabilities who receive SSI benefits. As discussed in Chapter 2, the disability community also needs to ensure that officials preparing the ConPlan do not assume that people with disabilities are either homeless or in need of supportive housing. It is important that the disability community check to make sure that these "mainstream" housing needs of people with disabilities (i.e., Section 8 and public housing) are not overlooked in the ConPlan narrative.

Write an Effective Needs Statement

Disability advocates should approach housing officials with a clear picture of the housing needs of people with disabilities. The disability community should take the lead in collecting and providing housing needs information to the appropriate officials, and should ensure that

these data are included in the final ConPlan sent to HUD. To have the greatest impact, data on the housing needs of people with disabilities should be offered to staff preparing the ConPlan **as early as possible** in the process so that this information is factored into decisions about the ConPlan's priorities and housing strategies.

There is no one correct way to assess need. Sources and methods that different communities employ vary depending on the size of the community, complexity of the populations, capacity of providers, and whether there are established mechanisms for collecting needs data, such as activities associated with a community's Continuum of Care application.

Regardless of the methodology used to gather the data, good estimates of need are sufficient for documenting the problem. It is important that the needs statement describe the housing needs of all people with disabilities. Given that ConPlan regulations require there to be a special section on the needs of people with disabilities who are homeless or in need of supportive housing, no one should be overlooked. The needs statement should also describe the needs of people with disabilities in residential settings, such as group homes, who may desire more independent housing options.

Whenever possible, the disability community should use existing sources to provide data regarding the housing needs of people with disabilities to the officials developing the ConPlan and the PHA Plan. For example, *Priced Out in 1998*, a publication by TAC and the Consortium for Citizens with Disabilities Housing Task Force,²⁹ provides documentation of the extreme housing crisis that people with disabilities receiving SSI confront in communities across the nation. Other policy and research reports, including reports published by the Social Security Administration and national advocacy organizations, contain data regarding the need for affordable housing for people with disabilities. The disability community should consult the local library and advocacy agencies, and use the Internet to find other available sources.

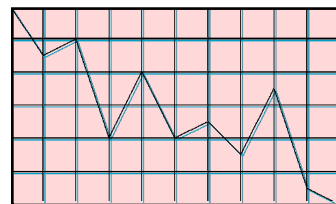
The disability community can also utilize data from management information systems of service providers to document the need for housing among the people they serve. Useful information includes the number of people on the waiting list for residential services or PHA housing assistance (including public housing and Section 8); the number of people who are living at home with aging parents, homeless, rent burdened, "doubled up" or living in sub-standard housing. Service providers should be asking these questions in order to develop comprehensive housing needs data.

Finally, disability providers can hold focus groups with people with disabilities to solicit information about their housing needs. This method of gathering information may be more labor-intensive and time-consuming, but the qualitative information received from people with disabilities combined with the quantitative data from management information systems or other sources provides a compelling picture of the housing crisis facing people with disabilities.

Appendix 4 provides a sample assessment of the housing needs of people with psychiatric and developmental disabilities in an urban county in the Midwestern US. This assessment can be used by the disability community as a model for developing a needs statement.

Analyze the Housing Market

The disability community should be sure that this section of the ConPlan points out the current factors that contribute to the housing crisis facing people with disabilities. The loss of federal housing available for people with disabilities due to the implementation of “elderly only” housing policies is of significant importance. Recent federal data show that over 50 percent of privately owned HUD assisted housing projects have adopted some preference for elderly people.³⁰ Due to these “elderly only” housing policies, TAC and the Consortium for Citizens with Disabilities Housing Task Force have estimated that approximately



273,000 apartments in federally subsidized elderly/disabled housing buildings will no longer be available to people with disabilities under age 62 by the year 2000.³¹

Document the Loss of Affordable Housing Due to “Elderly Only” Housing Designation

The disability community should **insist** that local officials preparing the ConPlan include a discussion of the designation of “elderly only” housing in the housing market analysis. HUD’s ConPlan guidelines state that the community must include an assessment of whether any federally assisted units are “expected to be lost from the assisted housing inventory **for any reason**”³² [emphasis added].

In responding to this requirement, housing officials preparing the ConPlan will focus attention on the physical loss of housing units, such as the demolition of public housing buildings, or on the loss of affordability, such as the expiration of project-based Section 8 contracts in some assisted housing developments. Without the disability community’s advocacy and involvement, staff preparing the ConPlan are unlikely to recognize that “elderly only” tenant selection policies in federal public and assisted housing constitute a real “loss” of units for people with disabilities.

To quantify the loss of federally funded public housing, people with disabilities or their advocates should contact the local PHA or HUD to see if the PHA has a HUD-approved PHA Allocation Plan to designate “elderly only” housing, or if it has any plans to do. The upcoming PHA Plan must include a discussion of plans to designate any housing and will be a good source of information for the disability community in the future. If there is an approved Allocation Plan, the number of units that are now available exclusively to elderly households represents the loss of housing for people with disabilities. [NOTE: HUD has approved over 120 Allocation Plans thus far, with a loss of over 46,000 units nationally. You can review HUD data regarding these Allocation Plans at www.hud.gov/pih/sac/sachome.html].

Documenting the loss of privately owned HUD assisted housing is more difficult because HUD does not require owners of this housing to report this information. However, if there are any HUD-assisted housing developments that no longer accept applications from people with disabilities, or limit the number of units available, the disability community should document this fact during the ConPlan process. If possible, the disability community should

organize a survey of all privately owned HUD-assisted housing in the area to determine which properties are no longer available to people with disabilities and provide this information to the staff preparing the draft ConPlan. A list of HUD assisted properties should be available through the local HUD Field Office.

Inventory Existing Resources

The approach used during the ConPlan process to inventory existing resources will vary depending on the size and complexity of the housing system in the community, but the disability community should ensure that the inventory is comprehensive and accurate. The inventory of capacity and resources should include a look at resources that lie outside of the traditional housing system, such as those resources typically accessed by people with disabilities, including group homes and other residential settings.

It should also include "mainstream" affordable housing resources, such as conventional public housing, Section 8, other rental subsidy programs, and other affordable housing and community development resources available in the community. Data available at HUD's web site³³ can provide a picture of how many people with disabilities are currently utilizing Section 8 subsidies or are residing in public housing in a particular community. The disability community should ensure that the information contained in the ConPlan inventory includes this type of data.

IDENTIFY BARRIERS

As stated earlier, there are two fundamental impediments to fair housing choice for people with disabilities: their extremely low incomes, and the discrimination they face in accessing affordable housing. The disability community should make sure that a state or locality's impediment analysis clearly documents these facts as significant barriers to people with disabilities to access housing in the community.

The disability community should make sure that the ConPlan clearly identifies the many ways people with disabilities are discriminated against in their attempts to access housing in the community. This discrimination may include:

- individual landlords refusing to rent to people with disabilities because of their disability;
- neighborhood opposition to the development of affordable housing for people with disabilities;
- a lack of physically accessible housing; and
- the unwillingness of housing providers to make reasonable accommodations for people with disabilities.

If the state or locality has not identified these impediments and/or has not formulated a plan to overcome them, the disability community can challenge the community's approach, and request that HUD instruct them to undertake a more comprehensive analysis of the impediments to fair housing choice.



CHAPTER 5: STRATEGIES THAT WORK

In order to have the maximum impact on the ConPlan process, the disability community should identify concrete housing strategies and recommendations. They should also be prepared to present these recommendations to officials developing the ConPlan. It is important that the disability community think “outside the box” when developing these recommendations—using both “mainstream” ConPlan programs (e.g. HOME, CDBG, ESG, and HOPWA programs) as well as other resources which can be targeted to people with a disabilities who are in need of affordable housing. Disability housing advocates should also keep in mind that most HUD housing programs are targeted to **all** people with disabilities. For this reason, partnerships and joint advocacy efforts with organizations that serve other disability populations are often helpful when trying to engage the housing officials that control the ConPlan process.



When developing strategies to obtain resources controlled by the ConPlan, it is necessary to have a good understanding of exactly how HOME, CDBG, ESG and HOPWA funds can best be used to expand housing—in other words, to not only know how they can be utilized, but also how they cannot. For example, HOME funds can be used for tenant-based rent subsidies, but cannot be used for project-based rent subsidies or for project operating subsidies. After reviewing this guidebook, if disability housing advocates have questions about how HUD resources can be used, they can request technical assistance from the staff preparing the ConPlan or contact HUD Community Builder staff through the local HUD Field Office.

It is also important to develop strategies that are **feasible** and that can work in the current housing environment. For example, HOME funded tenant-based rental assistance resources will not be effective if there is very little rental housing in the area. Similarly, targeting HOME funds for the acquisition and rehabilitation of rental housing will be problematic unless there is an organization with the expertise and experience to “make the project happen.” Remember, there are other organizations competing for these funds. You must be able to demonstrate the capacity to successfully carry out a feasible project.

Below are some examples of creative strategies addressing the housing needs of people with disabilities. These examples are designed to illustrate how resources controlled by the ConPlan can be used—frequently in combination with other HUD housing programs—to respond to the housing crisis experienced by all people with disabilities who have extremely low incomes.

STRATEGIES FOR ENGAGING HOUSING OFFICIALS RESPONSIBLE FOR PREPARING THE CONPLAN

Many state and local housing officials have had little experience with the disability community concerning the actual development of housing strategies. However, as more and more people with disabilities confront an affordable housing crisis, it is important for the disability community to begin to assertively engage housing officials at all levels of

government. Unfortunately, some housing officials regard federal housing funds controlled by the ConPlan as “their” money—and are reluctant to change how they spend it. In these communities, disability advocates will have to work much harder to establish working partnerships with these officials. Examples of ways to engage state and local housing and community officials are described below.



Requesting Assistance from HUD

Three years ago, the disability community in a large city established a Housing Task Force and developed a list of funding strategies and priorities for people with disabilities using ConPlan resources. After considering all of the options, the Task Force recommended that HOME funds be used to establish a rental assistance program for people with disabilities. Since the Task Force was created, members have provided oral testimony and submitted written comments each year during the ConPlan process, requesting that HOME funds be set-aside for this purpose. Two years ago, the Task Force expanded to include other disability organizations not previously involved, including people with physical disabilities and people with HIV/AIDS.

Working together, these organizations have repeatedly requested that the community's HOME funds be used to provide rental assistance. They have encouraged people with disabilities and their families to attend and speak out at ConPlan public hearings, and have met frequently with housing officials, including a meeting one year ago with the Director of the city's Housing Department.

After several years of frustration and no action from the city, the Housing Task Force decided that it was time to get HUD involved. Carrying written proof of the city's history of ignoring the needs of people with disabilities when developing the ConPlan, the group met with HUD Community Builder staff and requested their assistance. Task force members were able to document to HUD that the city's ConPlan described the priority housing needs of people with disabilities, but made no investment in ConPlan resources to address these needs. HUD staff were impressed by the efforts of the Housing Task Force, and agreed to engage city officials in a dialogue.

City officials soon learned about the HUD meeting, and became concerned that their relationships with HUD officials might be affected. They invited the Housing Task Force to a meeting, and, after much discussion, agreed that a rental assistance strategy using HOME funds would greatly assist people with disabilities with their housing problems. It was also agreed that the PHA would be the appropriate agency to administer the program. During the preparation of the next ConPlan Annual Action Plan, city officials included a substantial amendment to the ConPlan, which created a HOME funded tenant-based rental assistance program. The program now provides 25 people with disabilities with a two-year renewable rent subsidy.



Using the ConPlan Process to Influence the PHA Plan

A county Department of Public Health that provides services for people with developmental disabilities has spent the past few years providing testimony at its local ConPlan hearings and advocating for its “fair share” of resources for people with disabilities. It has succeeded in getting accurate

needs data put into the ConPlan, but has not been successful at getting housing resources targeted to people with developmental disabilities. While attending a state housing conference, the staff from a non-profit service provider learned about a new HUD planning process called the PHA Plan. In particular, they learned that the new PHA Plan would determine which low-income households would be given preference for assistance in the PHA's Section 8 program. The non-profit staff immediately informed the Housing Specialist of the Department of Public Health of this new housing policy that might impact all people with disabilities, including people with developmental disabilities.

Using the housing needs data developed for the ConPlan process, the Housing Specialist met with the Director of the PHA and, after much discussion, convinced her to conduct a review of the PHA's Section 8 and public housing programs to determine the number of people with disabilities being assisted in these programs. This review indicated that people with disabilities were probably being "steered" away from the PHAs public housing waiting lists by PHA staff. The PHA Director also was surprised to learn that 25 percent of the households on the Section 8 waiting list were people with disabilities. The Housing Specialist of the Department of Public Health then made two written recommendations regarding the PHA Plan to the PHA Director. They were: (1) to establish a preference in its Section 8 program for people with disabilities; and (2) to apply to HUD for the Section 8 Mainstream Program for People with Disabilities.

When the draft PHA Plan was published for public comment several months later, it included a strong housing needs assessment of people with developmental disabilities and other disabilities which was taken primarily from the ConPlan information supplied by the county Department of Public Health. The PHA Plan as drafted did not include a proposal to create a preference on the Section 8 program for people with disabilities. However, the PHA Plan did specifically state the PHA's commitment to apply to HUD for the maximum amount of Section 8 vouchers allowable under the Mainstream Program, and to engage in additional discussions regarding the increasing use of HOME tenant-based rental assistance funds. All parties involved agreed that this was a good first step in creating a partnership between the disability community and the PHA.

3

Building Non-Profit Capacity Using ConPlan Resources

The largest non-profit agency in the city serving people with psychiatric disabilities has recently decided to expand its mission statement to include the goal of expanding housing opportunities for their consumers. This change was a result of a recent needs assessment conducted by the agency that documented that the top concern among people with psychiatric disabilities was finding decent and affordable housing. A key factor in the non-profit agency's decision to take on housing activities was also the lack of capacity of the community's PHA, which was considered a "troubled" PHA by HUD.

It was recognized that this non-profit had very limited prior housing experience although they had a good track record administering HUD funds. For example, several years ago the agency had received CDBG funding to help renovate a mental health clubhouse program. They also administered a three year McKinney SHP grant to provide supportive services to

homeless people with mental illnesses through HUD's Continuum of Care process. Recognizing their need to develop capacity to undertake housing activities, the non-profit approached the city's community development agency that controls the ConPlan resources to ask for guidance and technical assistance. The community development officials were surprised that a disability service provider was considering developing housing, but they were very cooperative and invited the agency to be an active participant in the development of the next ConPlan.

City staff also informed the non-profit staff that additional technical assistance might be available from HUD technical assistance providers. Jointly they approached HUD regarding this need, and learned that a "Housing 101" workshop was planned as part of HUD's technical assistance activities in that region. After attending the workshop, both the city and the non-profit agency agreed that a separate non-profit organization dedicated to housing—specifically a Community Housing Development Organization (CHDO)—should be created. Continuing to work together, they identified HOME funds in the ConPlan that could be used as a capacity grant for a new CHDO. They also identified a local philanthropic organization that was interested in expanding capacity in the non-profit housing sector. Using funds from the philanthropic organization, a CHDO was created and incorporated. City officials then issued a Request For Proposals for CHDO capacity development grants, and the new CHDO was successful in obtaining these funds. Currently, the CHDO is working on its first supportive housing project, which will include 10 units of housing for people with psychiatric disabilities, as well as 10 units of affordable housing for families living in the community.

PROTECTING AND EXPANDING HOUSING OPPORTUNITIES USING THE CONPLAN

As stated earlier, in many communities across the nation it is impossible for people with disabilities to locate decent and safe housing without utilizing the resources controlled by the ConPlan, and its PHA counterpart, the PHA Plan. Specifically, people with disabilities receiving SSI benefits, on average, nationally, have to spend 69 percent of their income in order to rent a one-bedroom apartment. Without some sort of rental assistance, people with disabilities are too poor to obtain decent and affordable housing. The examples below outline ways to use ConPlan resources to expand rental assistance opportunities for people with disabilities.



4

The Link Between the PHA Plan, the ConPlan and "Elderly Only" Housing

Since 1996, the non-profit agencies serving people with disabilities in a suburban community had been meeting monthly. In 1998, these meetings—which usually focused on information exchange—began to focus on the housing problems facing people with disabilities. In particular, it was noted that there were some large HUD subsidized housing developments in the community that recently implemented "elderly only" eligibility policies. It appeared that younger people with disabilities were no longer able to access these housing units, although staff at the housing

complexes were not very forthcoming about the reasons why, except to say it was because of “a new HUD rule.”

After calling HUD and several housing advocacy organizations, the group was able to piece together that, in fact, there was a new federal housing policy that could restrict housing previously available to people with disabilities to now house only elderly households. At least 200 units in the community had been converted to “elderly only” housing. They also learned that the local PHA was intending to create “elderly only” housing and “disabled only” housing, which was also permitted by the new HUD rule. Not surprisingly, the “disabled only” housing was to be located in the worst public housing project located in a run-down neighborhood with a high crime rate.

Armed with the data regarding the need for affordable housing among people with disabilities and the loss of available affordable housing units, the group requested a meeting with the Director of the PHA and the city’s ConPlan staff. At this meeting, the group reviewed two critical policies. First, they learned the PHA could not designate “elderly only” or “disabled only” housing unless that designation was consistent with the HUD-approved ConPlan. Second, they found the most recent ConPlan had no discussion of creating “disabled only” housing, but rather emphasized housing programs for people with disabilities that were developed through a scattered site approach—specifically through the Section 8 and Shelter Plus Care tenant-based rental assistance programs. Faced with this information, and the strong opposition from the disability community, the PHA agreed to modify its plans. While they still intend to move forward with the designation of “elderly only” public housing, they withdrew their proposal to create any “disabled only” housing. Instead they decided to seek HUD HOPE VI funds to re-develop the deteriorated public housing project, and seek Section 8 vouchers to offset the loss of housing for people with disabilities that occurred from the implementation of “elderly only” housing policies.

5

Accessing New Housing Developed with HOME Funds

A woman with a psychiatric disability lived at home with her mother for many years. After talking about it for sometime, the mother and daughter decided that it was time for the daughter to live independently in the community. The daughter had a social worker whom she met with regularly who also felt the daughter was more than ready to live in her own apartment. The major barrier to this move seemed to be her lack of income to afford a modest apartment. The daughter only received \$500 each month in SSI benefits and the mother was in no position to assist her daughter financially. In fact, the loss of the daughter’s income to the household would be a hardship for her mother, because the daughter regularly paid the heat and electric bills.

As the mother, daughter, and social worker began to look for appropriate and affordable housing, the housing crisis facing people with disabilities became a reality for this family.

Many landlords in the private market were asking \$400 a month (or 76 percent of the daughter's income) for a small studio apartment!

After weeks of searching without success, the mother decided to call the city's housing department. After many phone calls and conversations, the mother learned that housing developed using certain types of federal funding controlled by the ConPlan process—particularly HOME funds—must have a percentage of affordable units. After calling the officials at the local housing department multiple times, the mother was finally able to get a list of some of those properties in the community developed with HOME funds. They contacted these properties and were surprised to learn that studio units were renting for \$200 per month and that—because of their small size—there were very few people on the waiting list for these units. Within 6 months the daughter had moved into her own studio apartment.

During her many conversations with city housing staff, the mother learned about the availability of HUD funds for emergency assistance for low-income people to pay heating bills during the winter months. This fact helped the mother develop a plan to apply for these funds for the following winter.

CONCLUSION

Across the nation, people with disabilities are facing a housing crisis. The combination of limited incomes, community discrimination, and the reduction in affordable housing units has made it virtually impossible for people with disabilities to locate and obtain safe and decent housing. In this day and age, the resources controlled by the ConPlan have become invaluable in expanding housing opportunities for people with disabilities.

Since the creation of the ConPlan in the early 1990s, housing and disability advocates have struggled to decipher the planning process so they can effectively access the housing and community development funds. This guidebook should provide the disability community with the information and tools necessary to engage state and local housing officials in a meaningful discussion about addressing the affordable housing needs of people with disabilities.

With the development of the new five-year ConPlans, and the PHA Plans, during the year 2000, it is important that the disability community use these tools to start influencing their area's planning process right now! The best approach is to get involved early and often in the process. Join with other disability advocates, get informed, and develop an overall strategy for influencing the process. Provide the housing officials with accurate and comprehensive needs data and information about the current housing market in that state or locality. Develop specific strategies for using the ConPlan resources to expand housing opportunities for people with disabilities. Most importantly, let local officials know that the disability community takes the ConPlan process seriously, that you will monitor their actions and responses carefully, and that you intend to take action if your recommendations are totally ignored. Don't stand on the sidelines and miss out!

CITATIONS

The authors of this guidebook wish to thank Ed Gramlich of the Center for Community Change and the US Department of Housing and Urban Development for allowing us to use materials from their publications HUD's Consolidated Plan and Guide to Continuum of Care Planning and Implementation, respectively.

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1. Further information regarding the Consolidated Plan is available at HUD's web site at www.hud.gov/progdesc/conplan.html
2. Priced Out in 1998: The Housing Crisis for People with Disabilities. Edgar, Elizabeth; et al. Technical Assistance Collaborative and Consortium for Citizens with Disabilities Housing Task Force. Boston: 1999.
3. Referred to in this guidebook as a "locality."
4. Generally, cities with populations greater than 50,000 and urban counties with populations greater than 250,000 receive federal housing and/or community development funding directly from HUD.
5. Summaries of selected ConPlans are available on the HUD web site at www.hud.gov/states.html
6. HUD's Community Planning and Development (CPD) Office administer all of the resources controlled by the ConPlan. Visit the CPD web site at www.hud.gov/cpd/cpdhome.html
7. The HOME program was authorized by Title II of the Cranston-Gonzalez National Affordable Housing Act and is governed by HUD regulations 24 CFR Section 92. Further information regarding the HOME program is available on line at www.hud.gov/progdesc/home1a.html
8. HUD regulations governing the CDBG program are available on line at www.hud.gov/cpd/cdbg/cdbgreg.html
9. The HUD regulations that govern the Emergency Shelter Grant program are located at 24 CFR Section 576.
10. The HUD regulations governing the HOPWA program are included in 24 CFR Section 574.
11. The HUD web site provides executive summaries of ways HOPWA grantees have used this funding. These summaries can be found on the internet at www.hud.gov/cpd/hopwa/statesum.html
12. A copy of the complete HUD regulations governing the Consolidated Plan are available at 24 CFR Section 91.
13. 24 CFR Section 91.110.
14. 24 CFR Section 91.105(a)(2)(i).
15. People with disabilities living on SSI benefits often cannot afford even modestly priced rental housing unless they spend more than 50 percent of their income for rent and utilities-considered a "severe" rent burden by HUD.

CITATIONS

16. Annually, HUD establishes the Fair Market Rent for every market area by reviewing the price of rents for efficiencies (i.e., studios), one bedrooms, two bedrooms, etc. in that county or metropolitan area. An apartment at the Fair Market Rent is meant to be modest, not luxurious, costing less than the typical apartment of that bedroom size in that city or county.
17. 24 CFR Section 91.215(a)(1).
18. 24 CFR Section 91.215(a)(2).
19. 24 CFR Section 91.325(1).
20. Fair Housing Planning Guide. US Department of Housing and Urban Development. Vol. 2.
21. Fair Housing Planning Guide. US Department of Housing and Urban Development. Vol. 2.
22. The HUD regulations that govern the McKinney Supportive Housing Program are located at 24 CFR Section 583.
23. The HUD regulations that govern the McKinney Shelter Plus Care Program are located at 24 CFR Section 582.
24. The HUD regulations that govern the McKinney Section 8 SRO program are located at 24 CFR Section 882.
25. For more information see the PHA Plan Interim Rule published on page 8169 of the Federal Register on February 18, 1999.
26. PHA Plan Interim Rule. Federal Register: 18 February 1999. p. 8178.
27. 24 CFR Section 91.105(g).
28. A complete copy of the HUD Secretary's memo is included as Appendix 3.
29. Available on line at www.c-c-d.org/priced_out_in_1998.htm
30. Assisted Housing: Occupancy Restrictions on Persons with Disabilities. United States General Accounting Office. 1998.
31. Opening Doors: Recommendations for a Federal Policy to Address the Housing Needs of People with Disabilities. TAC and CCD. Boston: 1999.
32. 24 CFR Section 91.210(b)(2).
33. Available at www.hud.gov/pih/systems/mtcs/pihmtcs.html
34. Excerpted from HUD's Consolidated Plan: An Action Guide for Involving Low Income Communities. Gramlich, Ed. Center for Community Change. Washington DC: 1998.

APPENDICES

Appendix 1 Fiscal Year 1999 ConPlan Allocations
Appendix 2 Sample Citizen Participation Plan
Appendix 3 Secretary Cuomo's Letter to HUD Field Offices
Appendix 4 Sample Needs Statement

APPENDIX 1: FISCAL YEAR 2001 CONPLAN ALLOCATIONS

Locality	CDBG	HOME	ESG	HOPWA
Alabama				
Anniston	814,000	0	0	0
Auburn	853,000	0	0	0
Bessemer	972,000	0	0	0
Birmingham	8,594,000	2,549,000	291,000	429,000
Decatur	568,000	0	0	0
Dothan	792,000	0	0	0
Florence	514,000	0	0	0
Gadsden	1,393,000	0	0	0
Hoover	276,000	0	0	0
Huntsville	1,834,000	800,000	0	0
Mobile	3,499,000	1,699,000	119,000	0
Montgomery	2,944,000	1,299,000	101,000	0
Opelika	393,000	0	0	0
Tuscaloosa	1,449,000	788,000	0	0
Jefferson Co.	2,809,000	1,048,000	96,000	0
Alabama State	34,207,000	17,111,000	1,492,000	964,000
Alaska				
Anchorage	2,344,000	1,069,000	80,000	0
Alaska State	3,328,000	3,000,000	112,000	0
Arizona				
Chandler	1,332,000	0	0	0
Flagstaff	757,000	0	0	0
Gilbert	480,000	0	0	0
Glendale	2,104,000	0	0	0
Mesa	3,590,000	0	122,000	0
Peoria City	641,000	0	0	0
Phoenix	15,875,000	5,708,000	541,000	1,193,000
Scottsdale	1,175,000	0	0	0
Tempe	1,971,000	0	0	0
Tucson	7,826,000	4,109,000	266,000	0
Yuma	1,020,000	0	0	0
Maricopa Co.	3,598,000	4,789,000	121,000	0
Pima Co.	3,111,000	0	106,000	0
Arizona State	11,250,000	6,819,000	698,000	453,000
Arkansas				
Conway	376,000	0	0	0
Fayetteville	665,000	0	0	0
Fort Smith	943,000	462,000	0	0
Jacksonville	334,000	0	0	0
Jonesboro	629,000	0	0	0
Little Rock	2,302,000	1,094,000	78,000	0
North Little Rock	932,000	430,000	0	0
Pine Bluff	1,191,000	531,000	0	0
Rogers	283,000	0	0	0
Springdale	340,000	0	0	0

Locality	CDBG	HOME	ESG	HOPWA
Texarkana	435,000	0	0	0
West Memphis	540,000	0	0	0
Arkansas State	24,818,000	12,667,000	1,066,000	640,000
California				
Alameda	1,427,000	0	0	0
Alhambra	1,948,000	801,000	0	0
Anaheim	4,832,000	1,723,000	164,000	0
Antioch	748,000	0	0	0
Apple Valley	596,000	0	0	0
Bakersfield	3,115,000	1,412,000	98,000	0
Baldwin Park	1,881,000	474,000	0	0
Bellflower	1,073,000	504,000	0	0
Berkeley	3,932,000	1,167,000	134,000	0
Buena Park	1,068,000	0	0	0
Burbank	1,385,000	744,000	0	0
Camarillo	468,000	0	0	0
Carlsbad	649,000	0	0	0
Carson	1,439,000	0	0	0
Cerritos	565,000	0	0	0
Chico	955,000	603,000	0	0
Chino	726,000	0	0	0
Chula Vista	2,114,000	936,000	0	0
Citrus Heights	833,000	0	0	0
Compton	2,976,000	975,000	101,000	0
Concord	1,142,000	0	0	0
Corona	1,196,000	0	0	0
Costa Mesa	1,427,000	670,000	0	0
Daly	1,653,000	0	0	0
Davis	956,000	647,000	0	0
Downey	1,361,000	527,000	0	0
El Cajon	1,397,000	771,000	0	0
El Monte	3,543,000	1,149,000	121,000	0
Encinitas	611,000	0	0	0
Escondido	1,724,000	745,000	0	0
Fairfield	857,000	0	0	0
Fontana	1,502,000	478,000	0	0
Fountain Valley	449,000	0	0	0
Fremont	1,757,000	0	0	0
Fresno	8,540,000	3,898,000	291,000	0
Fullerton	1,757,000	654,000	0	0
Gardena	1,017,000	0	0	0
Garden Grove	2,697,000	874,000	91,000	0
Gilroy City	570,000	0	0	0
Glendale	4,128,000	1,928,000	141,000	0
Glendora City	441,000	0	0	0
Hawthorne	1,656,000	737,000	0	0

(c) Indicates that this is a consortia.

APPENDIX 1: FISCAL YEAR 2001 CONPLAN ALLOCATIONS

Locality	CDBG	HOME	ESG	HOPWA
Hayward	1,820,000	0	0	0
Hemet	644,000	0	0	0
Hesperia	765,000	0	0	0
Huntington Beach	1,748,000	756,000	0	0
Huntington Park	2,227,000	820,000	76,000	0
Inglewood	2,843,000	1,131,000	97,000	0
Irvine	1,154,000	0	0	0
Laguna Niguel	322,000	0	0	0
La Habra	741,000	0	0	0
Lake Forest	368,000	0	0	0
Lakewood	746,000	0	0	0
La Mesa	609,000	0	0	0
Lancaster	1,254,000	0	0	0
Livermore	521,000	0	0	0
Lompoc	650,000	0	0	0
Long Beach	9,655,000	4,656,000	329,000	0
Los Angeles	92,946,000	39,823,000	3,166,000	9,691,000
Lynwood	2,063,000	700,000	0	0
Madera	837,000	0	0	0
Merced	1,471,000	680,000	0	0
Milpitas City	708,000	0	0	0
Mission Viejo	541,000	0	0	0
Modesto	2,579,000	1,167,000	87,000	0
Montebello	1,368,000	557,000	0	0
Monterey	294,000	0	0	0
Monterey Park	1,520,000	517,000	0	0
Moreno Valley	1,548,000	458,000	0	0
Mountain View	891,000	476,000	0	0
Napa City	700,000	0	0	0
National City	1,460,000	702,000	0	0
Newport Beach	518,000	0	0	0
Norwalk	1,794,000	461,000	0	0
Oakland	10,668,000	4,924,000	362,000	1,849,000
Oceanside	1,957,000	778,000	0	0
Ontario	2,572,000	855,000	88,000	0
Orange	1,465,000	526,000	0	0
Oxnard	3,133,000	971,000	107,000	0
Palmdale	1,072,000	0	0	0
Palm Springs	645,000	0	0	0
Palo Alto	771,000	0	0	0
Paradise	288,000	0	0	0
Paramount City	1,377,000	464,000	0	0
Pasadena	2,592,000	1,278,000	88,000	0
Petaluma	348,000	0	0	0
Pico Rivera	1,272,000	0	0	0
Pittsburg	741,000	0	0	0
Pleasanton City	327,000	0	0	0
Pomona	3,313,000	1,052,000	113,000	0
Porterville	758,000	0	0	0

Locality	CDBG	HOME	ESG	HOPWA
Rancho Cucamonga	1,001,000	0	0	0
Redding	958,000	612,000	0	0
Redlands	704,000	0	0	0
Redondo Beach	572,000	0	0	0
Redwood City	979,000	442,000	0	0
Rialto	1,175,000	0	0	0
Richmond	1,607,000	826,000	0	0
Riverside	3,659,000	1,483,000	125,000	1,581,000
Rosemead	1,567,000	558,000	0	0
Roseville	507,000	0	0	0
Sacramento	6,774,000	3,478,000	231,000	728,000
Salinas	2,564,000	997,000	87,000	0
San Bernardino	4,014,000	1,966,000	137,000	0
San Diego	18,911,000	8,654,000	644,000	2,427,000
San Francisco	25,819,000	7,875,000	879,000	9,557,000
San Jose	12,996,000	4,306,000	443,000	723,000
San Leandro	733,000	0	0	0
San Mateo	1,000,000	528,000	0	0
Santa Ana	8,479,000	2,183,000	289,000	1,267,000
Santa Barbara	1,471,000	824,000	0	0
Santa Clara	1,202,000	531,000	0	0
Santa Clarita	975,000	0	0	0
Santa Cruz	777,000	442,000	0	0
Santa Maria	1,344,000	0	0	0
Santa Monica	1,585,000	821,000	0	0
Santa Rosa	1,307,000	755,000	0	0
Santee	477,000	0	0	0
Seaside	574,000	0	0	0
Simi Valley	849,000	0	0	0
South Gate	2,717,000	959,000	93,000	0
South San Francisco	764,000	0	0	0
Stockton	5,140,000	2,214,000	175,000	0
Sunnyvale	1,389,000	617,000	0	0
Thousand Oaks	837,000	0	0	0
Torrance	1,380,000	639,000	0	0
Tulare	747,000	0	0	0
Turlock	720,000	969,000	0	0
Tustin	736,000	0	0	0
Union City	798,000	0	0	0
Upland	732,000	0	0	0
Vacaville	668,000	0	0	0
Vallejo	1,439,000	632,000	0	0
San Buenaventura	1,010,000	0	0	0
Victorville	800,000	0	0	0
Visalia	1,394,000	609,000	0	0
Vista	1,184,000	0	0	0
Walnut Creek	406,000	0	0	0
Watsonville	808,000	0	0	0
West Covina	1,393,000	0	0	0

(c) Indicates that this is a consortia.

APPENDIX 1: FISCAL YEAR 2001 CONPLAN ALLOCATIONS

Locality	CDBG	HOME	ESG	HOPWA
Westminster	1,392,000	451,000	0	0
Whittier	1,045,000	472,000	0	0
Woodland	577,000	0	0	0
Yorba Linda	333,000	0	0	0
Yuba	540,000	0	0	0
Alameda Co.	2,164,000	3,808,000	0	0
Contra Costa Co.	4,053,000	2,932,000	138,000	0
Fresno Co.	5,734,000	2,010,000	196,000	0
Kern Co.	6,481,000	2,284,000	228,000	0
Los Angeles Co.	38,788,000	13,269,000	1,321,000	0
Marin Co.	1,828,000	1,132,000	0	0
Orange Co.	5,056,000	1,771,000	171,000	0
Riverside Co.	10,435,000	3,079,000	354,000	0
Sacramento Co.	7,221,000	3,686,000	249,000	0
San Bernardino Co.	8,264,000	4,228,000	281,000	0
San Diego Co.	6,742,000	3,967,000	230,000	0
San Joaquin Co.	3,972,000	1,569,000	135,000	0
San Luis Obispo Co.	2,800,000	1,286,000	95,000	0
San Mateo Co.	3,766,000	2,256,000	129,000	0
Santa Clara Co.	2,669,000	1,039,000	91,000	0
Sonoma Co.	2,498,000	1,118,000	87,000	0
Ventura Co.	2,515,000	1,376,000	86,000	0
(C) Santa Barbara Co	0	1,642,000	0	0
California State	46,070,000	51,709,000	5,754,000	2,750,000
Colorado				
Arvada	704,000	0	0	0
Aurora	2,117,000	939,000	0	0
Boulder	1,206,000	682,000	0	0
Colorado Springs	3,260,000	1,538,000	111,000	0
Denver	12,005,000	4,109,000	409,000	1,281,000
Fort Collins	1,227,000	683,000	0	0
Grand Junction	504,000	0	0	0
Greeley	974,000	473,000	0	0
Lakewood	1,112,000	519,000	0	0
Longmont	516,000	0	0	0
Loveland	356,000	0	0	0
Pueblo	2,039,000	1,101,000	0	0
Westminster	692,000	0	0	0
Adams Co.	2,099,000	764,000	0	0
Arapahoe Co.	1,516,000	612,000	0	0
Jefferson Co.	1,326,000	496,000	0	0
Colorado State	11,625,000	7,766,000	943,000	0
Connecticut				
Bridgeport	4,371,000	1,832,000	149,000	0
Bristol	692,000	0	0	0
Danbury	684,000	0	0	0
East Hartford	698,000	0	0	0
Fairfield	681,000	0	0	0
Greenwich	1,199,000	0	0	0

Locality	CDBG	HOME	ESG	HOPWA
Hamden Town	562,000	0	0	0
Hartford	5,144,000	2,492,000	173,000	936,000
Manchester	725,000	0	0	0
Meriden	1,133,000	0	0	0
Middletown	528,000	0	0	0
Milford Town	665,000	0	0	0
New Britain	2,338,000	748,000	79,000	0
New Haven	5,035,000	1,892,000	171,000	734,000
New London	1,170,000	0	0	0
Norwalk	1,209,000	0	0	0
Norwich	1,282,000	0	0	0
Stamford	1,291,000	504,000	0	0
Stratford	778,000	0	0	0
Waterbury	2,869,000	1,007,000	97,000	0
West Hartford	1,322,000	0	0	0
West Haven	862,000	0	0	0
Connecticut State	14,811,000	11,096,000	1,029,000	1,060,000
Deleware				
Dover	311,000	0	0	0
Wilmington	3,100,000	714,000	106,000	638,000
New Castle Co.	2,716,000	1,044,000	92,000	0
Delaware State	2,020,000	3,000,000	79,000	134,000
District Of Columbia				
Washington	24,333,000	7,654,000	830,000	8,721,000
Florida				
Boca Raton	492,000	0	0	0
Boynton Beach	577,000	0	0	0
Bradenton	571,000	0	0	0
Cape Coral	613,000	0	0	0
Clearwater	1,029,000	513,000	0	0
Cocoa	333,000	0	0	0
Coral Springs	753,000	0	0	0
Davie	583,000	0	0	0
Daytona Beach	1,108,000	654,000	0	0
Deerfield Beach	555,000	0	0	0
Delray Beach	651,000	0	0	0
Deltona	466,000	0	0	0
Ft Lauderdale	2,769,000	1,119,000	94,000	6,429,000
Ft Myers	883,000	0	0	0
Fort Pierce	930,000	0	0	0
Fort Walton Beach	223,000	0	0	0
Gainesville	1,644,000	772,000	0	0
Hialeah	5,594,000	1,814,000	191,000	0
Hollywood	1,672,000	654,000	0	0
Lakeland	923,000	471,000	0	0
Largo	542,000	0	0	0
Lauderhill	693,000	0	0	0
Margate	426,000	0	0	0
Melbourne	741,000	0	0	0

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Locality	CDBG	HOME	ESG	HOPWA
Miami	13,148,000	5,408,000	448,000	10,269,000
Miami Beach	2,867,000	1,626,000	98,000	0
Miramar	553,000	0	0	0
Naples	149,000	0	0	0
North Miami	1,105,000	0	0	0
Ocala	746,000	0	0	0
Orlando	2,506,000	1,240,000	86,000	1,923,000
Palm Bay	652,000	0	0	0
Panama City	567,000	0	0	0
Pembroke Pines	688,000	0	0	0
Pensacola	1,179,000	0	0	0
Plantation	493,000	0	0	0
Pompano Beach	1,272,000	437,000	0	0
Port St Lucie	498,000	0	0	0
Punta Gorda	104,000	0	0	0
St Petersburg	3,050,000	1,526,000	104,000	0
Sarasota	667,000	885,000	0	0
Sunrise	628,000	0	0	0
Tallahassee	2,183,000	973,000	0	0
Tamarac	366,000	0	0	0
Tampa	4,995,000	2,318,000	171,000	2,092,000
Titusville	436,000	0	0	0
West Palm Beach	1,186,000	563,000	0	3,376,000
Winterhaven	332,000	0	0	0
Brevard Co.	1,929,000	1,521,000	0	0
Broward Co.	5,035,000	1,645,000	173,000	0
Collier Co.	1,938,000	0	0	0
Jacksonville-Duval	8,734,000	3,377,000	299,000	1,362,000
Escambia Co.	2,853,000	1,887,000	97,000	0
Hillsborough Co.	6,564,000	2,057,000	223,000	0
Lake Co.	969,000	0	0	0
Lee Co.	2,166,000	622,000	0	0
Miami-Dade Co.	23,023,000	6,427,000	784,000	0
Orange Co.	6,005,000	2,038,000	201,000	0
Palm Beach Co.	7,169,000	2,300,000	237,000	0
Pasco Co.	3,033,000	959,000	107,000	0
Pinellas Co.	3,743,000	1,705,000	128,000	0
Polk Co.	4,142,000	1,306,000	141,000	0
Sarasota Co.	1,668,000	0	0	0
Seminole Co.	2,759,000	0	94,000	0
Volusia Co.	2,782,000	2,057,000	94,000	0
Florida State	32,532,000	23,768,000	2,418,000	3,758,000
Georgia				
Albany	1,741,000	811,000	0	0
Athens-Clarke	1,662,000	762,000	0	0
Atlanta	12,508,000	4,362,000	426,000	4,389,000
Augusta	2,903,000	1,453,000	99,000	0
Columbus-Muscogee	2,819,000	1,464,000	96,000	0
Macon	2,055,000	1,134,000	0	0

APPENDIX 1: FISCAL YEAR 2001 CONPLAN ALLOCATIONS

Locality	CDBG	HOME	ESG	HOPWA
Marietta	588,000	0	0	0
Roswell	304,000	0	0	0
Savannah	3,546,000	1,488,000	119,000	0
Warner Robins	540,000	0	0	0
Clayton Co.	1,837,000	764,000	0	0
Cobb Co.	3,119,000	1,519,000	105,000	0
De Kalb Co.	5,333,000	2,256,000	182,000	0
Fulton Co.	2,728,000	1,208,000	93,000	0
Gwinnett Co.	2,935,000	852,000	98,000	0
Georgia State	45,667,000	20,692,000	1,834,000	1,544,000
Hawaii				
Honolulu	13,432,000	4,711,000	459,000	409,000
Hawaii State	5,152,000	3,000,000	174,000	152,000
Idaho				
Boise	1,376,000	695,000	0	0
Nampa	523,000	0	0	0
Pocatello	630,000	0	0	0
Idaho State	9,855,000	5,000,000	418,000	0
Illinois				
Arlington Hts	384,000	0	0	0
Aurora	1,404,000	0	0	0
Belleville	917,000	0	0	0
Berwyn	1,804,000	0	0	0
Bloomington	836,000	0	0	0
Bolingbrook	304,000	0	0	0
Champaign	980,000	0	0	0
Chicago	111,054,000	37,299,000	3,791,000	4,851,000
Chicago Heights	779,000	0	0	0
Cicero	2,045,000	0	0	0
Decatur	1,930,000	737,000	0	0
Dekalb	552,000	0	0	0
Des Plaines	326,000	0	0	0
Downers Grove	291,000	0	0	0
East St Louis	2,455,000	710,000	84,000	0
Elgin	1,024,000	0	0	0
Evanston	2,439,000	503,000	83,000	0
Joliet	1,188,000	516,000	0	0
Kankakee	798,000	0	0	0
Moline	1,045,000	0	0	0
Mount Prospect	368,000	0	0	0
Naperville	484,000	0	0	0
Normal	536,000	0	0	0
North Chicago	395,000	0	0	0
Oak Lawn	335,000	0	0	0
Oak Park	2,283,000	0	78,000	0
Palatine Village	269,000	0	0	0
Pekin	539,000	0	0	0
Peoria	2,546,000	1,166,000	86,000	0
Rantoul	422,000	0	0	0

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APPENDIX 1: FISCAL YEAR 2001 CONPLAN ALLOCATIONS

Locality	CDBG	HOME	ESG	HOPWA
Rockford	2,760,000	1,119,000	93,000	0
Rock Island	1,643,000	0	0	0
Schaumburg Village	397,000	0	0	0
Skokie	664,000	0	0	0
Springfield	1,631,000	766,000	0	0
Urbana	553,000	1,036,000	0	0
Waukegan	938,000	0	0	0
Wheaton City	350,000	0	0	0
Cook Co.	12,583,000	6,279,000	431,000	0
Du Page Co.	3,733,000	2,272,000	127,000	0
Kane Co.	1,162,000	0	0	0
Lake Co.	2,952,000	1,502,000	90,000	0
Mchenry Co.	1,289,000	411,000	0	0
Madison Co.	3,890,000	1,465,000	132,000	0
St Clair Co.	2,211,000	1,198,000	76,000	0
Will Co.	1,715,000	467,000	0	0
Illinois State	39,361,000	26,023,000	2,368,000	628,000
Indiana				
Anderson	1,228,000	576,000	0	0
Bloomington	1,105,000	692,000	0	0
East Chicago	1,856,000	499,000	0	0
Elkhart	989,000	0	0	0
Evansville	3,779,000	997,000	128,000	0
Fort Wayne	3,167,000	1,037,000	115,000	0
Gary	4,760,000	1,453,000	165,000	0
Goshen	339,000	0	0	0
Hammond	2,977,000	715,000	101,000	0
Indianapolis	12,321,000	5,026,000	415,000	654,000
Kokomo	1,261,000	0	0	0
Lafayette	878,000	734,000	0	0
Mishawaka	611,000	0	0	0
Muncie	1,859,000	679,000	0	0
New Albany	847,000	0	0	0
South Bend	3,724,000	1,123,000	127,000	0
Terre Haute	2,514,000	516,000	85,000	0
West Lafayette	530,000	0	0	0
Lake Co.	1,721,000	669,000	0	0
Indiana State	38,130,000	16,121,000	1,743,000	686,000
Iowa				
Cedar Falls	402,000	0	0	0
Cedar Rapids	1,602,000	627,000	0	0
Council Bluffs	1,299,000	0	0	0
Davenport	2,191,000	809,000	75,000	0
Des Moines	5,313,000	1,423,000	180,000	0
Dubuque	1,489,000	0	0	0
Iowa City	970,000	714,000	0	0
Sioux City	2,456,000	705,000	84,000	0
Waterloo	1,867,000	815,000	0	0
Iowa State	31,306,000	11,330,000	1,319,000	0

Locality	CDBG	HOME	ESG	HOPWA
Kansas				
Kansas City	3,418,000	1,157,000	115,000	0
Lawrence	1,125,000	611,000	0	0
Leavenworth	466,000	0	0	0
Overland Park	680,000	0	0	0
Topeka	2,441,000	740,000	87,000	0
Wichita	3,902,000	2,062,000	133,000	0
Johnson Co.	1,634,000	865,000	0	0
Kansas State	21,227,000	8,299,000	850,000	0
Kentucky				
Ashland	876,000	0	0	0
Covington	2,247,000	617,000	77,000	0
Henderson	358,000	0	0	0
Hopkinsville	506,000	0	0	0
Lexington-Fayette	2,748,000	1,499,000	94,000	0
Louisville	12,273,000	3,241,000	419,000	372,000
Owensboro	790,000	450,000	0	0
Jefferson Co.	3,280,000	1,289,000	112,000	0
Kentucky State	35,566,000	18,674,000	1,288,000	349,000
Louisiana				
Alexandria	1,063,000	484,000	0	0
Baton Rouge	5,975,000	2,419,000	204,000	739,000
Bossier City	758,000	0	0	0
Houma-Terrebonne	2,038,000	604,000	0	0
Kenner	1,023,000	0	0	0
Lafayette	2,529,000	936,000	87,000	0
Lake Charles	1,320,000	583,000	0	0
Monroe	1,493,000	611,000	0	0
New Orleans	20,523,000	7,940,000	698,000	2,538,000
Shreveport	3,930,000	1,655,000	134,000	0
Slidell	245,000	0	0	0
Thibodaux	340,000	0	0	0
Jefferson Parish	5,134,000	2,585,000	176,000	0
Louisiana State	38,571,000	16,491,000	1,585,000	854,000
Maine				
Auburn	787,000	0	0	0
Bangor	1,264,000	0	0	0
Lewiston	1,322,000	0	0	0
Portland	2,591,000	678,000	88,000	0
Maine State	17,062,000	6,650,000	693,000	0
Maryland				
Annapolis	428,000	0	0	0
Baltimore	30,905,000	9,054,000	1,048,000	5,525,000
Cumberland	1,291,000	0	0	0
Frederick	445,000	0	0	0
Hagerstown	1,151,000	0	0	0
Anne Arundel Co.	2,560,000	858,000	87,000	0
Baltimore Co.	4,965,000	2,347,000	170,000	0
Harford Co.	1,356,000	538,000	0	0

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Locality	CDBG	HOME	ESG	HOPWA
Howard Co.	1,229,000	0	0	0
Montgomery Co.	6,052,000	2,232,000	205,000	0
Prince Georges Co.	7,170,000	2,752,000	245,000	0
Maryland State	9,309,000	7,563,000	516,000	0
Massachusetts				
Arlington	1,518,000	0	0	0
Attleboro	585,000	0	0	0
Barnstable	416,000	0	0	0
Boston	25,638,000	7,538,000	875,000	3,107,000
Brockton	1,826,000	935,000	0	0
Brookline	1,939,000	0	0	0
Cambridge	4,030,000	883,000	137,000	0
Chicopee	1,532,000	0	0	0
Fall River	3,663,000	1,202,000	125,000	0
Fitchburg	1,402,000	633,000	0	0
Framingham	647,000	0	0	0
Gloucester	905,000	0	0	0
Haverhill	1,321,000	0	0	0
Holyoke	1,734,000	1,421,000	0	0
Lawrence	2,369,000	1,378,000	81,000	0
Leominster	553,000	0	0	0
Lowell	2,934,000	1,252,000	100,000	0
Lynn	3,373,000	1,021,000	115,000	0
Malden	1,852,000	2,394,000	0	0
Medford	2,185,000	0	0	0
New Bedford	3,782,000	1,381,000	128,000	0
Newton	2,725,000	1,167,000	93,000	0
Northampton	918,000	0	0	0
Pittsfield	1,884,000	0	0	0
Plymouth	458,000	0	0	0
Quincy	2,530,000	768,000	86,000	0
Salem	1,436,000	0	0	0
Somerville	3,717,000	839,000	127,000	0
Springfield	5,274,000	2,086,000	179,000	836,000
Taunton	1,037,000	0	0	0
Waltham	1,250,000	0	0	0
Westfield	525,000	0	0	0
Weymouth	875,000	0	0	0
Worcester	5,922,000	1,772,000	202,000	0
Yarmouth	210,000	0	0	0
(C) Peabody	0	2,199,000	0	0
(C) Barnstable Co.	0	781,000	0	0
Massachusetts State	38,972,000	15,016,000	2,235,000	981,000
Michigan				
Ann Arbor	1,421,000	783,000	0	0
Battle Creek	1,730,000	523,000	0	0
Bay City	1,926,000	441,000	0	0
Benton Harbor	689,000	0	0	0
Canton Twp	458,000	0	0	0

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Locality	CDBG	HOME	ESG	HOPWA
Clinton Twp	668,000	0	0	0
Dearborn	2,632,000	532,000	87,000	0
Dearborn Heights	1,293,000	0	0	0
Detroit	52,767,000	18,465,000	1,806,000	1,732,000
East Lansing	890,000	0	0	0
Farmington Hills	425,000	0	0	0
Flint	5,756,000	2,148,000	197,000	0
Grand Rapids	5,013,000	1,854,000	170,000	0
Holland	436,000	0	0	0
Jackson	1,911,000	532,000	0	0
Kalamazoo	2,410,000	1,015,000	82,000	0
Lansing	2,554,000	1,349,000	86,000	0
Lincoln Park	960,000	0	0	0
Livonia	516,000	0	0	0
Midland	344,000	0	0	0
Muskegon	1,383,000	571,000	0	0
Muskegon Hts	586,000	0	0	0
Norton Shores	177,000	0	0	0
Pontiac	2,163,000	943,000	0	0
Portage	267,000	0	0	0
Port Huron	1,160,000	488,000	0	0
Redford	1,057,000	0	0	0
Rochester Hills	332,000	0	0	0
Roseville	583,000	0	0	0
Royal Oak	1,586,000	0	0	0
Saginaw	3,409,000	1,230,000	116,000	0
St Clair Shores	1,058,000	0	0	0
Southfield	598,000	0	0	0
Sterling Heights	737,000	0	0	0
Taylor	813,000	0	0	0
Troy City	416,000	0	0	0
Warren	1,172,000	487,000	0	0
Waterford Township	505,000	0	0	0
Westland	1,223,000	455,000	0	0
Wyoming	565,000	0	0	0
Genesee Co.	2,834,000	1,255,000	97,000	0
Kent Co.	1,747,000	0	0	0
Macomb Co.	1,973,000	685,000	0	0
Oakland Co.	4,176,000	1,486,000	142,000	0
Wayne Co.	6,449,000	2,971,000	130,000	0
(C) Washtenaw Co.	0	540,000	0	0
Michigan State	44,903,000	27,466,000	2,716,000	786,000
Minnesota				
Bloomington	522,000	0	0	0
Duluth	3,668,000	824,000	125,000	0
Minneapolis	17,465,000	4,088,000	598,000	759,000
Moorhead	466,000	0	0	0
Plymouth	322,000	0	0	0
Rochester	633,000	0	0	0

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Locality	CDBG	HOME	ESG	HOPWA
St Cloud	716,000	0	0	0
St Paul	10,353,000	2,583,000	353,000	0
Anoka Co.	1,931,000	0	0	0
Dakota Co.	2,110,000	2,342,000	0	0
Hennepin Co.	3,583,000	1,916,000	122,000	0
Ramsey Co.	1,472,000	0	0	0
St Louis Co.	3,197,000	768,000	109,000	0
Washington Co.	1,041,000	0	0	0
Minnesota State	25,244,000	10,222,000	1,162,000	99,000
Mississippi				
Biloxi	773,000	0	0	0
Gulfport	1,037,000	909,000	0	0
Hattiesburg	1,073,000	504,000	0	0
Jackson	3,689,000	1,584,000	127,000	0
Moss Point	341,000	0	0	0
Pascagoula	443,000	0	0	0
Mississippi State	39,251,000	15,203,000	1,450,000	955,000
Missouri				
Columbia	1,078,000	595,000	0	0
Florissant	290,000	0	0	0
Independence	1,081,000	546,000	0	0
Joplin	972,000	0	0	0
Kansas City	11,862,000	3,157,000	401,000	907,000
Lees Summit	375,000	0	0	0
St Charles	427,000	0	0	0
St Joseph	2,438,000	580,000	83,000	0
St Louis	28,348,000	5,612,000	969,000	1,062,000
St. Peters City	255,000	0	0	0
Springfield	1,917,000	1,097,000	0	0
St Louis Co.	6,585,000	2,793,000	226,000	0
Missouri State	30,077,000	16,433,000	1,233,000	448,000
Montana				
Billings	923,000	502,000	0	0
Great Falls	1,107,000	467,000	0	0
Missoula	725,000	0	0	0
Montana State	8,105,000	4,520,000	368,000	0
Nebraska				
Lincoln	2,239,000	1,172,000	76,000	0
Omaha	6,264,000	2,750,000	222,000	0
Nebraska State	15,457,000	5,214,000	524,000	0
Nevada				
Henderson	963,000	0	0	0
Las Vegas	4,228,000	0	143,000	803,000
North Las Vegas	1,310,000	0	0	0
Reno	1,995,000	1,386,000	0	0
Sparks	585,000	0	0	0
Clark Co.	4,842,000	4,122,000	163,000	0
(C) Lyon Co.	0	523,000	0	0
Nevada State	3,026,000	3,000,000	265,000	211,000

Locality	CDBG	HOME	ESG	HOPWA
New Hampshire				
Dover	450,000	0	0	0
Manchester	2,255,000	702,000	77,000	0
Nashua	878,000	0	0	0
Portsmouth	716,000	0	0	0
Rochester	380,000	0	0	0
New Hampshire State	10,399,000	4,422,000	434,000	0
New Jersey				
Asbury Park	530,000	0	0	0
Atlantic City	1,991,000	561,000	0	0
Bayonne	2,313,000	0	78,000	0
Bloomfield	1,554,000	0	0	0
Brick Township	426,000	0	0	0
Bridgeton	644,000	0	0	0
Camden	3,855,000	1,583,000	131,000	0
Cherry Hill	478,000	0	0	0
Clifton	1,820,000	0	0	0
Dover Township	531,000	0	0	655,000
East Orange	2,119,000	1,016,000	0	0
Edison	642,000	0	0	0
Elizabeth	2,930,000	1,442,000	100,000	0
Gloucester Twp	337,000	0	0	0
Hamilton	665,000	0	0	0
Irvington	1,445,000	631,000	0	0
Jersey City	8,896,000	3,177,000	302,000	2,155,000
Long Branch	702,000	0	0	0
Middletown	368,000	0	0	0
Millville	395,000	0	0	0
Newark	11,907,000	4,402,000	404,000	6,532,000
New Brunswick	1,001,000	455,000	0	0
North Bergen	1,085,000	0	0	0
Old Bridge Township	368,000	0	0	0
Parsippany-Troyhills	287,000	0	0	0
Passaic	1,421,000	901,000	0	0
Paterson	3,477,000	1,822,000	118,000	1,252,000
Perth Amboy	962,000	499,000	0	0
Sayreville	205,000	0	0	0
Trenton	3,948,000	975,000	135,000	0
Union City	1,705,000	0	0	0
Union	859,000	0	0	0
Vineland	670,000	811,000	0	0
Wayne Township	247,000	0	0	0
Woodbridge	739,000	0	0	734,000
Atlantic Co.	1,312,000	616,000	0	0
Bergen Co.	12,945,000	2,888,000	437,000	0
Burlington Co.	2,115,000	814,000	0	0
Camden Co.	2,962,000	1,253,000	101,000	0
Essex Co.	7,634,000	1,299,000	262,000	0
Gloucester Co.	1,885,000	783,000	0	0

(c) Indicates that this is a consortia.

Locality	CDBG	HOME	ESG	HOPWA
Hudson Co.	5,163,000	3,446,000	176,000	0
Middlesex Co.	2,073,000	1,547,000	0	0
Monmouth Co.	3,822,000	1,834,000	130,000	0
Morris Co.	2,678,000	960,000	91,000	0
Ocean Co.	2,458,000	1,299,000	83,000	0
Somerset Co.	1,607,000	548,000	0	0
Union Co.	6,473,000	1,416,000	219,000	0
(C) Mercer Co.	0	613,000	0	0
New Jersey State	10,086,000	7,403,000	1,467,000	1,858,000
New Mexico				
Albuquerque	5,486,000	2,393,000	187,000	0
Las Cruces	1,237,000	522,000	0	0
Rio Rancho	298,000	0	0	0
Santa Fe	763,000	0	0	0
New Mexico State	16,000,000	6,914,000	619,000	459,000
New York				
Albany	4,821,000	1,094,000	165,000	388,000
Amherst Town	703,000	1,088,000	0	0
Auburn	1,303,000	0	0	0
Babylon Town	1,580,000	661,000	0	0
Binghamton	3,048,000	678,000	104,000	0
Buffalo	21,874,000	6,197,000	745,000	412,000
Cheektowaga Town	981,000	0	0	0
Clay Town	355,000	0	0	0
Colonie Town	471,000	0	0	0
Dunkirk	717,000	0	0	0
Elmira	1,748,000	527,000	0	0
Glens Falls	670,000	0	0	0
Greece	518,000	0	0	0
Hamburg Town	551,000	0	0	0
Huntington Town	1,150,000	0	0	0
Irondequoit	1,109,000	0	0	0
Islip Town	2,393,000	805,000	81,000	1,535,000
Jamestown	1,721,000	484,000	0	0
Middletown	696,000	0	0	0
Mount Vernon	2,294,000	756,000	78,000	0
Newburgh	1,094,000	0	0	0
New Rochelle	2,041,000	512,000	0	0
New York City	228,747,000	115,949,000	7,792,000	52,589,000
Niagara Falls	3,412,000	858,000	116,000	0
Poughkeepsie	1,355,000	0	0	0
Rochester	12,116,000	3,913,000	413,000	536,000
Rome	1,424,000	0	0	0
Saratoga Springs	463,000	0	0	0
Schenectady	3,304,000	1,555,000	112,000	0
Syracuse	7,859,000	2,275,000	267,000	0
Tonawanda Town	2,128,000	0	0	0
Troy	2,574,000	0	88,000	0
Union Town	1,726,000	0	0	0

APPENDIX 1: FISCAL YEAR 2001 CONPLAN ALLOCATIONS

Locality	CDBG	HOME	ESG	HOPWA
Utica	4,047,000	1,066,000	138,000	0
West Seneca	311,000	0	0	0
White Plains	1,244,000	0	0	0
Yonkers	4,555,000	1,926,000	156,000	0
Dutchess Co.	1,853,000	965,000	0	0
Erie Co.	3,067,000	1,201,000	103,000	0
Monroe Co.	2,128,000	1,237,000	0	0
Nassau Co.	18,140,000	3,299,000	619,000	0
Onondaga Co.	2,400,000	808,000	80,000	0
Orange Co.	2,037,000	1,297,000	0	0
Rockland Co.	2,296,000	922,000	78,000	0
Suffolk Co.	4,309,000	1,771,000	147,000	0
Westchester Co.	6,831,000	1,653,000	234,000	0
(C) Jefferson Co.	0	1,414,000	0	0
New York State	57,218,000	35,484,000	3,029,000	2,100,000
North Carolina				
Asheville	1,563,000	1,266,000	0	0
Burlington	422,000	0	0	0
Chapel Hill	441,000	0	0	0
Charlotte	4,914,000	2,445,000	166,000	477,000
Concord	409,000	843,000	0	0
Durham	1,906,000	1,054,000	0	0
Fayetteville	1,565,000	827,000	0	0
Gastonia	739,000	571,000	0	0
Goldsboro	623,000	377,000	0	0
Greensboro	2,025,000	1,946,000	0	377,000
Greenville	870,000	835,000	0	0
Hickory	316,000	0	0	0
High Point	824,000	0	0	0
Jacksonville	544,000	0	0	0
Kannapolis	549,000	0	0	0
Lenoir	207,000	973,000	0	0
Morganton	144,000	0	0	0
Raleigh	2,446,000	1,188,000	83,000	449,000
Rocky Mount	803,000	887,000	0	0
Salisbury	366,000	0	0	0
Wilmington	945,000	622,000	0	0
Winston Salem	1,937,000	1,277,000	0	0
Cumberland Co.	1,896,000	740,000	0	0
Wake Co.	1,826,000	501,000	0	0
(C) Surry Co.	0	588,000	0	0
(C) Orange Co.	0	483,000	0	0
North Carolina Sta	47,402,000	17,887,000	2,312,000	1,063,000
North Dakota				
Bismarck	469,000	0	0	0
Fargo	883,000	0	0	0
Grand Forks	562,000	0	0	0
North Dakota State	6,463,000	3,995,000	284,000	0

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APPENDIX 1: FISCAL YEAR 2001 CONPLAN ALLOCATIONS

Locality	CDBG	HOME	ESG	HOPWA
Ohio				
Akron	8,762,000	2,491,000	297,000	0
Alliance	879,000	0	0	0
Barberton	965,000	0	0	0
Bowling Green	430,000	0	0	0
Canton	3,798,000	987,000	129,000	0
Cincinnati	17,343,000	5,340,000	589,000	434,000
Cleveland	30,794,000	8,908,000	1,060,000	765,000
Cleveland Heights	1,991,000	0	0	0
Columbus	8,864,000	5,584,000	303,000	508,000
Dayton	8,496,000	2,593,000	292,000	0
East Cleveland	1,381,000	627,000	0	0
Elyria	768,000	0	0	0
Euclid	1,297,000	0	0	0
Fairborn	454,000	0	0	0
Hamilton City	1,905,000	657,000	0	0
Kent	443,000	0	0	0
Kettering	547,000	0	0	0
Lakewood	2,669,000	0	90,000	0
Lancaster	675,000	0	0	0
Lima	1,527,000	494,000	0	0
Lorain	1,639,000	736,000	0	0
Mansfield	1,128,000	528,000	0	0
Marietta	546,000	0	0	0
Massillon	956,000	0	0	0
Mentor	254,000	0	0	0
Middletown	759,000	0	0	0
Newark	999,000	0	0	0
Parma	1,107,000	0	0	0
Springfield	2,627,000	831,000	89,000	0
Steubenville	1,000,000	0	0	0
Toledo	10,087,000	3,427,000	340,000	0
Warren	1,662,000	1,096,000	0	0
Youngstown	5,713,000	1,370,000	195,000	0
Butler Co.	1,498,000	939,000	0	0
Cuyahoga Co.	3,716,000	2,784,000	118,000	0
Franklin Co.	2,239,000	869,000	76,000	0
Hamilton Co.	3,572,000	1,614,000	122,000	0
Lake Co.	1,598,000	555,000	0	0
Montgomery Co.	2,579,000	1,175,000	88,000	0
Stark Co.	1,723,000	1,234,000	0	0
Summit Co.	1,742,000	677,000	0	0
Ohio State	57,266,000	32,630,000	2,956,000	939,000
Oklahoma				
Broken Arrow	513,000	0	0	0
Edmond	472,000	0	0	0
Enid	770,000	0	0	0
Lawton	1,154,000	568,000	0	0
Midwest City	613,000	0	0	0

Locality	CDBG	HOME	ESG	HOPWA
Norman	1,035,000	494,000	0	0
Oklahoma City	6,507,000	2,893,000	222,000	375,000
Shawnee	543,000	0	0	0
Tulsa	4,863,000	2,304,000	166,000	0
(C) Tulsa Co.	0	1,311,000	0	0
Oklahoma State	21,738,000	12,120,000	909,000	445,000
Oregon				
Ashland	230,000	0	0	0
Beaverton	490,000	0	0	0
Corvallis	697,000	556,000	0	0
Eugene	1,603,000	1,612,000	0	0
Gresham	698,000	0	0	0
Hillsboro	493,000	0	0	0
Medford	659,000	0	0	0
Portland	12,232,000	4,746,000	415,000	880,000
Salem	1,462,000	944,000	0	0
Springfield	702,000	0	0	0
Clackamas Co.	2,545,000	964,000	87,000	0
Multnomah Co.	323,000	0	0	0
Washington Co.	1,987,000	1,212,000	0	0
Oregon State	15,837,000	10,331,000	852,000	0
Pennsylvania				
Abington	993,000	0	0	0
Allentown	3,381,000	877,000	115,000	0
Altoona	2,620,000	556,000	90,000	0
Bensalem Township	433,000	0	0	0
Bethlehem	2,031,000	572,000	0	0
Bristol Township	728,000	0	0	0
Carlisle	479,000	0	0	0
Chester	1,956,000	512,000	0	0
Easton	1,203,000	0	0	0
Erie	4,622,000	1,327,000	157,000	0
Harrisburg	2,911,000	801,000	99,000	0
Haverford	1,170,000	0	0	0
Hazleton	1,184,000	0	0	0
Johnstown	2,162,000	429,000	0	0
Lancaster	2,360,000	737,000	80,000	0
Lebanon	1,054,000	0	0	0
Lower Merion	1,465,000	0	0	0
Mckeesport	1,653,000	0	0	0
Millcreek Township	316,000	0	0	0
Norristown	1,222,000	0	0	0
Penn Hills	798,000	0	0	0
Philadelphia	71,675,000	16,281,000	2,436,000	6,224,000
Pittsburgh	21,934,000	4,394,000	749,000	539,000
Reading	4,080,000	928,000	139,000	0
Scranton	4,301,000	777,000	146,000	0
Sharon	842,000	0	0	0
State College	991,000	433,000	0	0

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Locality	CDBG	HOME	ESG	HOPWA
Upper Darby	2,523,000	0	86,000	0
Wilkes-Barre	2,456,000	441,000	84,000	0
Williamsport	1,708,000	474,000	0	0
York	2,140,000	574,000	0	0
Allegheny Co.	19,779,000	4,849,000	670,000	0
Beaver Co.	4,902,000	1,269,000	166,000	0
Berks Co.	3,237,000	581,000	110,000	0
Bucks Co.	2,730,000	1,178,000	93,000	0
Chester Co.	3,316,000	1,017,000	113,000	0
Delaware Co.	4,923,000	1,244,000	166,000	0
Lancaster Co.	3,943,000	1,177,000	134,000	0
Luzerne Co.	6,367,000	1,143,000	215,000	0
Montgomery Co.	4,239,000	1,288,000	144,000	0
Washington Co.	5,542,000	1,221,000	188,000	0
Westmoreland Co.	5,270,000	1,959,000	178,000	0
York Co.	2,983,000	736,000	102,000	0
Pennsylvania State	60,357,000	28,884,000	2,877,000	1,335,000
Rhode Island				
Cranston	1,324,000	0	0	0
East Providence	926,000	0	0	0
Pawtucket	2,618,000	642,000	89,000	0
Providence	7,600,000	2,328,000	259,000	481,000
Warwick	997,000	0	0	0
Woonsocket	1,604,000	550,000	55,000	0
Rhode Island State	5,880,000	4,451,000	309,000	0
South Carolina				
Aiken	276,000	0	0	0
Anderson	949,000	0	0	0
Charleston	1,381,000	770,000	0	0
Columbia	1,531,000	828,000	0	1,003,000
Florence	526,000	0	0	0
Greenville	1,412,000	438,000	0	0
Myrtle Beach	272,000	0	0	0
Rock Hill	629,000	0	0	0
Spartanburg	976,000	460,000	0	0
Sumter	644,000	0	0	0
Charleston Co.	3,005,000	1,148,000	102,000	0
Greenville Co.	2,676,000	978,000	91,000	0
Lexington Co.	1,144,000	0	0	0
Spartanburg Co.	1,531,000	0	0	0
(C) Sumter Co.	0	1,143,000	0	0
South Carolina State	29,887,000	12,732,000	1,393,000	1,614,000
South Dakota				
Rapid City	680,000	0	0	0
Sioux Falls	1,012,000	560,000	0	0
South Dakota State	8,462,000	3,716,000	344,000	0
Tennessee				
Bristol	256,000	0	0	0
Chattanooga	2,682,000	1,345,000	90,000	0

APPENDIX 1: FISCAL YEAR 2001 CONPLAN ALLOCATIONS

Locality	CDBG	HOME	ESG	HOPWA
Clarksville	965,000	433,000	0	0
Jackson	785,000	417,000	0	0
Johnson City	656,000	0	0	0
Kingsport	534,000	0	0	0
Knoxville	2,576,000	1,514,000	88,000	0
Memphis	11,479,000	5,618,000	391,000	913,000
Murfreesboro	619,000	0	0	0
Nashville-Davidson	6,004,000	3,082,000	205,000	587,000
Oak Ridge	299,000	0	0	0
Knox Co.	1,421,000	464,000	0	0
Shelby Co.	1,615,000	511,000	0	0
Tennessee State	31,505,000	16,339,000	1,305,000	628,000
Texas				
Abilene	1,481,000	594,000	0	0
Amarillo	2,480,000	1,025,000	85,000	0
Arlington	2,982,000	1,124,000	101,000	0
Austin	8,508,000	3,499,000	285,000	1,202,000
Baytown City	1,126,000	0	0	0
Beaumont	2,431,000	926,000	83,000	0
Brownsville	4,436,000	1,317,000	144,000	0
Bryan	1,085,000	444,000	0	0
Carrollton	777,000	0	0	0
College Station	1,227,000	596,000	0	0
Conroe	557,000	0	0	0
Corpus Christi	5,082,000	1,987,000	173,000	0
Dallas	19,778,000	7,740,000	675,000	2,808,000
Denison	482,000	0	0	0
Denton	1,113,000	574,000	0	0
Edinburg	977,000	0	0	0
El Paso	12,795,000	4,715,000	437,000	0
Fort Worth	7,960,000	3,054,000	271,000	740,000
Galveston	1,886,000	676,000	0	0
Garland	2,062,000	661,000	0	0
Grand Prairie	1,397,000	459,000	0	0
Harlingen	1,379,000	446,000	0	0
Houston	36,420,000	13,155,000	1,234,000	4,393,000
Irving	2,304,000	885,000	79,000	0
Killeen	1,075,000	439,000	0	0
Laredo	4,485,000	1,504,000	152,000	0
Lewisville	535,000	0	0	0
Longview	1,065,000	459,000	0	0
Lubbock	3,260,000	1,292,000	111,000	0
Mc Allen	2,668,000	764,000	91,000	0
Marshall	546,000	0	0	0
Mesquite	1,076,000	0	0	0
Midland	1,353,000	0	0	0
Mission	1,054,000	0	0	0
Missouri City	347,000	0	0	0
New Braunfels	463,000	0	0	0

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APPENDIX 1: FISCAL YEAR 2001 CONPLAN ALLOCATIONS

Locality	CDBG	HOME	ESG	HOPWA
North Richland Hills	382,000	0	0	0
Odessa	1,673,000	495,000	0	0
Orange	540,000	0	0	0
Pasadena	2,109,000	684,000	0	0
Pharr	1,375,000	0	0	0
Plano	1,162,000	0	0	0
Port Arthur	1,915,000	563,000	0	0
Richardson	578,000	0	0	0
Round Rock	466,000	0	0	0
San Angelo	1,425,000	533,000	0	0
San Antonio	21,009,000	7,888,000	710,000	908,000
San Benito	704,000	0	0	0
San Marcos	741,000	0	0	0
Sherman	435,000	0	0	0
Sugar Land	322,000	0	0	0
Temple	780,000	0	0	0
Texarkana	595,000	0	0	0
Texas City	652,000	0	0	0
Tyler	1,317,000	624,000	0	0
Victoria	1,006,000	0	0	0
Waco	2,268,000	1,072,000	77,000	0
Wichita Falls	1,895,000	625,000	0	0
Bexar Co.	2,138,000	581,000	78,000	0
Brazoria Co.	2,281,000	622,000	77,000	0
Dallas Co.	2,324,000	659,000	77,000	0
Fort Bend Co.	1,970,000	473,000	77,000	0
Harris Co.	11,532,000	3,174,000	398,000	0
Hidalgo Co.	9,038,000	2,100,000	306,000	0
Montgomery Co.	1,904,000	0	0	0
Tarrant Co.	3,723,000	1,217,000	126,000	0
(C) Wharton Co.	0	989,000	0	0
Texas State	88,604,000	41,515,000	4,526,000	2,529,000
Utah				
Clearfield	356,000	0	0	0
Layton	445,000	0	0	0
Ogden	1,616,000	538,000	0	0
Orem	782,000	0	0	0
Provo	2,104,000	1,702,000	0	0
Salt Lake City	5,031,000	1,350,000	169,000	380,000
Sandy City	595,000	0	0	0
Taylorsville	469,000	0	0	0
West Jordan	495,000	0	0	0
West Valley	1,185,000	0	0	0
Salt Lake Co.	3,245,000	1,898,000	111,000	0
Utah State	8,020,000	3,358,000	544,000	59,000
Vermont				
Burlington	1,099,000	0	0	0
Vermont State	8,910,000	3,990,000	338,000	0

Locality	CDBG	HOME	ESG	HOPWA
Virginia				
Alexandria	1,243,000	670,000	0	0
Bristol	380,000	0	0	0
Charlottesville	708,000	834,000	0	0
Chesapeake	1,602,000	620,000	0	0
Colonial Heights	109,000	0	0	0
Danville	1,289,000	531,000	0	0
Fredericksburg	255,000	0	0	0
Hampton	1,412,000	762,000	0	0
Hopewell	291,000	0	0	0
Lynchburg	1,089,000	464,000	0	0
Newport News	2,212,000	1,286,000	75,000	0
Norfolk	6,827,000	2,305,000	242,000	0
Petersburg	861,000	0	0	0
Portsmouth	2,325,000	1,030,000	79,000	0
Richmond	6,331,000	2,028,000	212,000	587,000
Roanoke	2,239,000	751,000	76,000	0
Suffolk	792,000	594,000	0	0
Virginia Beach	3,135,000	1,297,000	107,000	905,000
Arlington Co.	2,428,000	1,098,000	80,000	0
Chesterfield Co.	1,438,000	448,000	0	0
Fairfax Co.	6,370,000	2,076,000	216,000	0
Henrico Co.	1,586,000	721,000	0	0
Prince William Co.	1,771,000	604,000	0	0
Virginia State	24,550,000	13,289,000	1,328,000	555,000
Washington				
Auburn	412,000	0	0	0
Bellevue	754,000	0	0	0
Bellingham	921,000	463,000	0	0
Bremerton	592,000	0	0	0
Everett	963,000	0	0	0
Federal Way	608,000	0	0	0
Kennewick	598,000	0	0	0
Lakewood	943,000	0	0	0
Olympia	425,000	0	0	0
Pasco	656,000	0	0	0
Richland	296,000	717,000	0	0
Seattle	15,282,000	4,347,000	520,000	1,522,000
Shoreline	392,000	0	0	0
Spokane	4,750,000	1,801,000	162,000	0
Tacoma	3,519,000	2,281,000	119,000	0
Vancouver	1,185,000	0	0	0
Yakima	1,199,000	686,000	0	0
Clark Co.	1,563,000	1,213,000	0	0
King Co.	6,303,000	3,634,000	213,000	0
Kitsap Co.	1,475,000	1,068,000	0	0
Pierce Co.	3,610,000	1,341,000	147,000	0
Snohomish Co.	3,525,000	1,822,000	121,000	0
Spokane Co.	1,972,000	773,000	0	0

(c) Indicates that this is a consortia.

APPENDIX 1: FISCAL YEAR 2001 CONPLAN ALLOCATIONS

Locality	CDBG	HOME	ESG	HOPWA
(C) Longview	0	521,000	0	0
Washington State	16,248,000	10,647,000	1,032,000	556,000
West Virginia				
Charleston	2,495,000	1,246,000	85,000	0
Huntington	2,773,000	1,120,000	95,000	0
Parkersburg	1,365,000	476,000	0	0
Weirton	615,000	0	0	0
Wheeling	1,955,000	669,000	0	0
West Virginia State	21,692,000	9,539,000	869,000	0
Wisconsin				
Appleton	745,000	0	0	0
Beloit	851,000	0	0	0
Eau Claire	936,000	534,000	0	0
Green Bay	1,274,000	790,000	0	0
Janesville	696,000	0	0	0
Kenosha	1,374,000	660,000	0	0
La Crosse	1,356,000	501,000	0	0
Madison	2,611,000	1,660,000	89,000	0
Milwaukee	23,062,000	9,410,000	783,000	442,000
Neenah	263,000	0	0	0
Oshkosh	1,059,000	0	0	0
Racine	2,667,000	998,000	91,000	0
Sheboygan	1,267,000	0	0	0
Superior	1,138,000	0	0	0
Waukesha	508,000	0	0	0
Wausau	879,000	0	0	0
Wauwatosa	1,397,000	0	0	0
West Allis	1,648,000	0	0	0
Dane Co.	1,153,000	0	0	0
Milwaukee Co.	1,799,000	1,177,000	0	0
Waukesha Co.	1,209,000	1,367,000	0	0
Wisconsin State	34,288,000	15,718,000	1,827,000	359,000
Wyoming				
Casper	563,000	0	0	0
Cheyenne	631,000	0	0	0
Wyoming State	3,534,000	3,500,000	160,000	0

(c) Indicates that this is a consortia.

APPENDIX 2

SAMPLE CITIZEN PARTICIPATION PLAN

This sample is based on the current CDBG and CHAS laws and regulations for formula jurisdictions. It is also enriched by the experiences of low-income people over the last 23 years from cities large and small across the country.

Text in regular type face is rooted in the laws or regulations. Underlined text consists of suggestions that go beyond what is minimally required by law or regulation, but which can be very helpful in preventing problems and in fostering genuine public participation and accountability.

INTRODUCTION

The City of _____ is required by law to have a detailed Citizen Participation Plan which contains the City's policies and procedures for public involvement in the Consolidated Plan process and the use of CDBG, HOME, ESG and HOPWA money. This Citizen Participation Plan must be available to the public.

Encouraging Public Participation

The law requires that our Citizen Participation Plan both provide for and encourage public participation, emphasizing involvement by low and moderate income people—especially those living in low and moderate income neighborhoods. Also, the U.S. Department of Housing and Urban Development (HUD) expects _____ (City) _____ to take whatever actions are appropriate to encourage participation of minorities, people who do not speak English, and people with disabilities.

Copies of this Citizen Participation Plan, as well as summaries of basic information about CDBG, HOME, ESG, HOPWA, and the Consolidated Planning process are available in the languages of residents who comprise a significant portion of the low and moderate income population. Currently, _____ (City) _____ has materials in Spanish, Mandarin, and Vietnamese. Residents needing materials in other languages are encouraged to contact City staff.

The Role of Low Income People

The law declares that the primary purpose of the programs covered by this Citizen Participation Plan is to improve communities by providing: decent housing, a suitable living environment, and growing economic opportunities—all principally for low and moderate income people.

Because the amount of federal CDBG, HOME, ESG, and HOPWA money _____ (City) _____ gets each year is mostly based upon the severity of both poverty and substandard housing conditions in _____ (City) _____, it is necessary that public participation genuinely involve low income residents who experience these conditions.

Genuine involvement by low income people must take place at all stages of the process, including:

- Identifying needs.
- Setting priorities among these needs, deciding how much money should be allocated to each high-priority need, and suggesting the types of programs to meet high-priority needs.
- Overseeing the way in which programs are carried out.

The Various Stages of the Consolidated Plan Process

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:

1. Identification of housing and community development **needs**.
2. Preparation of a draft use of funds for the upcoming year, called the **proposed Annual Action Plan**. Sometimes there might also be the development of a proposed new Five-Year Strategic Plan.
3. Formal approval by elected officials of a final Annual Action Plan or Five-Year Strategic Plan.

4. On occasion during the year, it might 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 proposed, considered, and acted upon.
5. After a "program year" is complete, an **Annual Performance Report** must be drafted for public review and comment and then sent to HUD.

The Program Year

The "program year" chosen by ____ (City) ____ is Month x through Month y.

PUBLIC NOTICE

Items Covered by the Public Notice Requirement

There shall be advanced public notice once a federally required document is available, such as the Proposed Annual Action Plan or Five-Year Consolidated Plan, any proposed Substantial Amendment to the Action Plan or Consolidated Plan, and the Annual Performance Report.

In addition, there shall be advanced public notice of all public hearings and all public meetings such as Community Advisory Committee meetings or City Council Subcommittee meetings relating to the funds or planning process covered by this Citizen Participation Plan.

"Adequate" Public Notice

Adequate advance notice is "timely"; it is given with enough lead time for the public to take informed action. The amount of lead time can vary, depending on the event. Specific amounts of time are given for different events later in this Citizen Participation Plan. The content of notices will give residents a clear understanding of the event being announced.

Forms of Public Notice

1. a. Public notices will be published in the "Major Newspaper(s) of the City" as display advertisements in a non-legal section of the newspaper(s). [Editorial Note: Some jurisdictions might be required by local law to also place a formal notice in the legal section of the newspaper.] [Editorial Note: Technically, the regulations only require non-legal section notice for public hearings, but the spirit of "adequate notice" and "encouraging" public participation in the regulations suggests that "small print notices" buried in the legal pages of the newspaper would not be "adequate" for notices related to other (nonpublic hearing) parts of the Consolidated Plan process.]
 - b. In addition, press releases will be sent to the newspaper(s).
2. Display ads and press releases will also be placed in: "Neighborhood Newspaper X," "Neighborhood Newspaper Y," "The African-American Herald," "El Tiempo," and "The Asian Argus."
3. Public Service Announcements and press releases will be distributed to local radio and television stations.
4. Notice will also be given through letters to neighborhood organizations, public housing resident groups, religious organizations in lower income neighborhoods, and agencies providing services to lower income people.
5. Notice will be sent to any person or organization requesting to be on a mailing list.

PUBLIC ACCESS TO INFORMATION

As required by law, ____ (City) ____ will provide the public with reasonable and timely access to information and records relating to the data or content of the Consolidated Plan, as well as the proposed, actual, and past use of funds covered by this Citizen Participation Plan. Regarding the past use of funds, the law requires reasonable public access to records about any uses of these funds during the previous five years.

Also, as required by law, ____ (City) ____ will provide the public with reasonable and timely access to local meetings relating to the proposed or actual use of funds (such as Community Advisory Committee meetings, Planning Commission meetings, City Council subcommittee meetings, etc.).

Standard Documents

Standard documents include:

- The proposed and final Annual Action Plans.
- The proposed and final Five-Year Strategic Plan (the "Consolidated Plan").
- Proposed and final Substantial Amendments to either an Annual Action Plan or the Five-Year Strategic Plan.
- Annual Performance Reports.
- The Citizen Participation Plan.

Availability of Standard Documents

In the spirit of encouraging public participation, copies of standard documents will be provided to the public at no cost and within two working days of a request.

These materials will be available in a form accessible to persons with disabilities, when requested.

Places Where Standard Documents Are Available

Standard documents will be available at: the Central Library and the Library Branches in ___(names of low income neighborhoods) the offices of Neighborhood Organization x, Neighborhood Organization y, and Neighborhood Organization z; as well as the offices of the City Department that administers CDBG.

PUBLIC HEARINGS

Public hearings are required by law in order to obtain the public's views and to provide the public with the City's responses to public questions and proposals. The law requires public hearings at all stages of the process, including at least a hearing about community needs, a public hearing to review proposed uses of funds, and a public hearing to assess how funds were spent during the previous program year. (More about these specific hearings is in the sections of this Citizen Participation Plan relating to each of the "stages.")

Access to Public Hearings

Public hearings will be held only after there has been **adequate notice** as described in the Public Notice part of this Citizen Participation Plan, including a display advertisement in the non-legal section of the newspaper 14 days prior to the public hearing.

Public hearings will be held at x:00, a **time** convenient to most people who might benefit from the use of funds. [Editorial Note. Generally this time should be an evening hour that gives people who work typical jobs a chance to get off of work, perhaps deal with child care, and then get to the location of the hearing. For some, an occasional weekend time is often welcome. Hearings at times such as 9:00 a.m. or 3:00 p.m. are not good; it is difficult for many members of the public to make daytime meetings.]

Public hearings will be held at **places** accessible by bus and otherwise convenient and not **intimidating** to most people who might benefit from the use of funds. Public hearings will be held at Community Center x, School y, and Library z. The public hearing to approve the final Annual Action Plan or final Five-Year Strategy will be conducted at City Hall.

Public Hearings and Populations with Unique Needs

All public hearings will be held at locations accessible to people with disabilities, and provisions will be made for people with disabilities when requests are made at least five working days prior to a hearing. Translators will be provided for people who do not speak English when requests are made at least five working days prior to a hearing.

The Conduct of Public Hearings

To ensure that public hearings are meaningful to residents, each public hearing will be conducted in the presence of the Mayor and City Council. Also, each resident choosing to speak will be allowed a minimum of five? seven? ten? minutes to make a verbal presentation. [Editorial Note. In some cases it might be ok if public hearings about "needs" are not held with elected officials present; you decide what is needed in your community.]

THE STAGES IN THE PROCESS

A. Identifying Needs

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.

The laws and regulations require a public hearing each year to obtain residents' opinions about needs, and what priority those needs have. In order to encourage public involvement, 3? 5? n? public hearings will be held in different neighborhoods [accessible by bus?] to determine the specific needs and priorities identified by low and moderate income people. [Editorial Note. As indicated above, it might be ok if these "needs" hearings are conducted with city staff, not elected officials. Perhaps one "needs" hearing should be held in front of at least a subcommittee of the City Council if not the full City Council.]

Public hearings about needs will be completed 30 days? 45 days? 60 days? before a draft Annual Action Plan is published for comment, so that the needs identified can be considered by the City and addressed in the draft Annual Action Plan.

B. The "Proposed" Annual Action Plan (and/or Five-Year Strategy)

The law providing the funds covered by this Citizen Participation Plan calls for improved accountability of jurisdictions to the public. In that spirit and in compliance with the terms of the law, ____(City)_____ will use the following procedures.

General Information

At the beginning of this stage, ____(City)_____ will provide the public with an estimate of the amount of CDBG, HOME, ESG, and HOPWA funds it expects to receive in the upcoming year, along with a description of the range of types of activities that can be funded with these resources. Also, the public will be given an estimate of the amount of these funds which will be used in ways that will benefit low and moderate income people.

The plans of ____(City)_____ to minimize the extent to which low and moderate income people will have to leave their homes as a result of the use of these federal dollars (called "displacement") will also be available at this time. This "anti-displacement plan" will also describe how ____ (City)_____ will compensate people who are actually displaced as a result of the use of these funds, specifying the type and amount of compensation.

Technical Assistance

City staff will work with organizations and individuals representative of low and moderate income people who are interested in submitting a proposal to obtain funding for an activity. All potential applicants for funding are encouraged to contact City staff for technical assistance before completing a proposal form.

Availability of a Proposed Annual Action Plan

Thirty days? forty-five days? sixty days? after the last public hearing about housing and community development needs, ____ (City)_____ will notify the public that a Proposed Annual Action Plan is available. The means of "notice" described earlier in the section on "Public Notice" will be used.

Also, the date the Proposed Annual Action Plan is available to the public will be at least 60 days? 75 days? 90 days? prior to the date a Final Annual Action Plan is approved by the Mayor and City Council so that low and moderate income people will have a reasonable opportunity to examine it and to submit comments. [Editorial Note: The regulations only require a 30-day period.]

Copies of the Proposed Annual Action Plan will be made available to the public for free and without delay. In addition, copies will be available at the locations specified above in the section, "Public Access to Information." A summary of the Proposed Annual Action Plan will also be written and provided free of charge to those requesting it.

So that low and moderate income people can determine the degree to which they might be affected, they will be provided complete copies of the Proposed Annual Action Plan, containing: all HUD-required sections, the HUD-required Priorities Table, and a written description of all proposed uses of CDBG, HOME, ESG, and HOPWA. At a minimum, this description shall include the type of activity, its location, and the amount of federal money to be allocated to it.

Public Hearing and Further Action

A public hearing [Editorial Note: Should there be more than one?] about the Proposed Annual Action Plan will be conducted by the Mayor and City Council 30 days? 45 days? 60 days? after it is available to the public. In addition, this public hearing will be held so that there are another 30 days? 15 days? before a Final Annual Action Plan is approved by the Mayor and City Council so that the elected officials can consider the public's comments from the public hearing.

In preparing a Final Annual Action Plan, careful consideration will be given to all comments and views expressed by the public, whether given as verbal testimony at the public hearing or submitted in writing during the review and comment period. The Final Annual Action Plan will have a section that presents all comments and explains why any comments were not accepted.

C. The "Final" Annual Action Plan (and/or Five-Year Strategy)

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 locations specified above in the section, "Public Access to Information."

D. "Amendments" to the Annual Action Plan (and/or Five-Year Strategy)

The Final Annual Action Plan will be amended any time 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 (described more fully later). The public will be notified whenever there is an amendment.

"Substantial" Amendments

The following will be considered "substantial" amendments:

1. A change in the use of CDBG money from one activity to another.
2. A change in the use of HOME, ESG, or HOPWA money from one activity to another.
3. The elimination of an activity originally described in the Annual Action Plan.
4. The addition of an activity not originally described in the Annual Action Plan.
5. A change in the purpose of an activity, such as a change in the type of activity or its ultimate objective— for example, a change in a construction project from housing to commercial.
6. A meaningful change in the location of an activity.
7. 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 percent of area median income; between 31 percent and 50 percent of AMI, and between 51 percent and 80 percent of AMI.
 - b. Race or ethnicity.
 - c. Renter or homeowner
 - d. Single households, small ones (two to four persons), large ones (five or more persons).
8. A 10 percent? 15 percent? 20 percent? decrease in the number of low or moderate income people benefiting from an activity.
9. A change in the scope of an activity, such that there is a 10 percent? 15 percent? 20 percent? increase or decrease in the amount of money allocated to the activity.

Public Notice and Public Hearing for Substantial Amendments

There must be reasonable notice of a proposed Substantial Amendment so that residents will have an opportunity to review it and comment on it. Notice will be made according to the procedures described earlier in this Citizen Participation Plan, with the addition of the following procedures specifically for Substantial Amendments:

1. There will be 30 days advance notice of and availability of a proposed Substantial Amendment before there is a public hearing about it.

2. A detailed written description of the proposed Substantial Amendment will be made available to the public at no cost within two working days of a request. Also, copies will be available at the locations indicated earlier in this Citizen Participation Plan under "Public Access to Information."
3. There will be a public hearing regarding the proposed Substantial Amendment conducted by the Mayor and City Council. This public hearing will not take place until the public has had 30 days to review the proposed Substantial Amendment.
4. The public hearing will be held no sooner than two weeks prior to submission to HUD.
5. In preparing a Final Substantial Amendment, careful consideration will be given to all comments and views expressed by the public, whether given as verbal testimony at the public hearing or submitted in writing during the review and comment period. The Final Substantial Amendment will have a section that presents **all** comments and explains why any comments were not accepted.

E. The Annual Performance Report

Every year, _____(City)_____ must send into HUD an Annual Performance Report within 90 days of the close of the program year. In general, the Annual Performance Report must describe how funds were actually used and the extent to which these funds were used for activities that benefited low and moderate income people.

Public Notice and Public Hearing for Annual Performance Report

There must be reasonable notice that an Annual Performance Report is available so that residents will have an opportunity to review it and comment on it. Notice will be made according to the procedures described earlier in this Citizen Participation Plan, with the addition of the following procedures specifically for Annual Performance Reports:

1. There will be 30 days? 45 days? 60 days? advance notice of and availability of an Annual Performance Report before there is a public hearing about it.
2. A complete copy of the Annual Performance Report will be made available to the public at no cost within two working days of a request. Copies will be available at the locations indicated earlier in this Citizen Participation Plan under "Public Access to Information."
3. There will be a public hearing regarding the Annual Performance Report. [Editorial Note: Although the law clearly calls for a public hearing at this stage, HUD's regs do not explicitly require one at this point. However, in the spirit of "enhanced public accountability" (also in the law), a public hearing at this stage is very important.]
4. This public hearing will be conducted by the Mayor and City Council, in the interest of public accountability. It will not take place until the public has had 30 days? 45 days? 60 days? to review the Annual Performance Report.
5. In preparing an Annual Performance Report for submission to HUD, careful consideration will be given to all comments and views expressed by the public, whether given as verbal testimony at the public hearing or submitted in writing. The Annual Performance Report sent to HUD will have a section that presents **all** comments and explains why any comments were not accepted.

Contents of the Annual Performance Report

The Annual Performance Report presented to the public will contain at least as much detail as was required by HUD for CDBG Grantee Performance Reports. The Annual Performance Report will have an accounting for each activity in any Action Plan, until an activity is officially "closed-out" with HUD by the jurisdiction. For **each activity** the details presented will include, but not be limited to:

1. Activity Number from the Action Plan.
2. Name of the Activity plus its HUD "Activity Title" with regulation reference.
3. A description of the activity that is in enough detail for the public to have a clear understanding of the nature of the activity.

4. The name of the entity carrying out the activity.
5. The location of the activity.
 - a. Generally, this will be a street address or some other information showing specifically where the activity was (or is) being carried out.
 - b. For public facility activities such as street reconstruction not located at a specific street address, the beginning and ending points of the activity will be indicated.
 - c. For activities claiming to meet the "areawide benefit test," the location will also include the census tracts and/or block groups making up the service area of the activity. Also, the percentage of low/mod income persons in the service area will be indicated.
 - d. For multi-family housing activities, the address of each building and the number of units in the building both before and after assistance will be given.
6. The description of economic development activities will include the amount of the loan, the interest rate, and the length of the loan. It will also indicate the number of permanent, full-time jobs to be created or retained, with the number of such jobs to be held by or available to low/mod income people indicated in parentheses. The same information will be provided for part-time jobs, stating the number of hours per week the part-time jobs offer.
7. "Float Loan Funded" activities and "Section 108 Loan Guaranteed" activities should be clearly identified as such.
8. The date the activity was initially funded.
9. The "national objective" the activity claims to meet.
10. The status of an activity, such as whether it is completed, underway, or canceled.
11. The amount of CPD dollars "budgeted" and the amount "spent." The amount "spent" shall be given for the year, and separately for the life of the activity to date.
12. For public service activities, the amount of money which meets HUD's definition of "unliquidated obligation" will be reported.
13. If "program income" dollars and/or "revolving loan fund" dollars are being used for an activity, this will be indicated.
14. The accomplishments for the activity will be a description of what was actually done, including numerical measures when appropriate, such as number of units of housing rehabbed and number of individuals or households served. For economic development activities, the report will show the total number of jobs created or retained, plus the number of these held by or available to low/mod income people. For part-time jobs, the report will include the number of hours worked per week, and separately indicate the total number of "full-time-equivalent" jobs.
15. For activities that provide a direct benefit to individuals or households, the report will show: the number of individuals or households served, the number which were "moderate" income; the number which were "low" income; and, the number which were White, Black, Latino, or Asian.

COMPLAINT PROCEDURES

Written complaints from the public will receive a meaningful, written reply within 15 working days.

CHANGING THE CITIZEN PARTICIPATION PLAN

This Citizen Participation Plan can be changed only after the public has been notified of an intent to modify it, and only after the public has had a reasonable chance to review and comment on proposed substantial changes to it.

THE COMMUNITY ADVISORY COMMITTEE

_____ (City) _____ has created a Community Advisory Committee (CAC) in the spirit of the law, which calls for increased accountability to the public, as well as the encouragement of active participation by low and moderate income people.

The CAC is a 25? 15?-member body that contributes to public participation by helping to: identify housing and community development needs; establish priorities relating to those needs; propose activities and projects to address high-priority needs; and, suggest the amount of federal, state, and local monies to be allocated to those activities.

At any given time, no less than 70 percent of the CAC membership shall be comprised of individuals representing low income people and/or organizations which serve low income people. At least 50 percent of these members shall actually be low-income people.

All CAC meetings are open to the public and are advertised as described above in the "Public Notice" section of this Citizen Participation Plan.

All CAC meetings will be held at neighborhood sites, such as the Smith Community Center, the meeting hall at Kennedy Towers Seniors Residence, the Fish School, or the West Side Branch library. All facilities are accessible to people with disabilities.

All CAC meetings will be held at times convenient for lower income people, so that as many people can participate as possible. In general, meetings will be held after 6:00 p.m.

The Chair and/or Vice-Chair will establish the agenda of CAC meetings, in cooperation with City staff. Only the Chair or Vice-Chair can cancel or reschedule a CAC meeting.

The CAC will receive monthly performance updates that shall also be available to the public. Performance updates will be provided to the CAC seven days prior to a monthly meeting.

The CAC will recommend to the Mayor and City Council how to allocate all CDBG, HOME, ESG, and HOPWA funds, including "program income" associated with these, monies left unspent and unobligated from the previous program year, and any additional (not previously anticipated) federal fund allotments. In no event shall CDBG, HOME, ESG, or HOPWA funds be allocated without review by the CAC.

APPENDIX 3 LETTER TO HUD'S FIELD OFFICES

U.S. Department of Housing and Urban Development
Washington, D.C. 20410

February 23, 1999

MEMORANDUM TO SEC REPS AND FIELD STAFF

FROM: Andrew Cuomo, Secretary

SUBJECT: Consolidated Plan and the Involvement of Persons with Disabilities and Advocates

Department regulations for citizen participation in development of the Consolidated Plan calls for jurisdictions to include data regarding the housing needs of people with disabilities. While the regulations clearly define persons with disabilities as those with physical, mental, and emotional impairments and require their participation, it comes to our attention that persons with all types of disabilities and their housing needs are not always included.

Many jurisdictions have already made efforts to reach out to persons with disabilities and to advisory boards, task forces, and advocacy organizations. Those efforts have resulted in a fuller understanding of not only the needs, but the contributions of persons with disabilities to our communities.

It is critical that persons with disabilities and their housing needs be fully considered in every jurisdiction we serve. To do so, we must reach out to persons with disabilities and their chosen advocates and hear their perspectives. I want to remind you that each jurisdiction is required to (1) include persons with disabilities in the Consolidated Plan development process and (2) include data regarding housing needs of persons with disabilities.

We are committed to addressing the housing needs of communities through a holistic approach, which includes persons with disabilities: physical, mental and emotional. Thank you in advance for ensuring that the needs of this population are given full consideration and attention in the Consolidated Plans of the communities you serve.

APPENDIX 4

A SAMPLE HOUSING NEEDS STATEMENT FOR PEOPLE WITH PSYCHIATRIC AND DEVELOPMENTAL DISABILITIES

People with psychiatric and developmental disabilities share a common need for safe and affordable permanent housing. The challenge for many of these individuals is that their disability limits or precludes competitive employment, leaving them on fixed or very limited incomes—usually supplemental security (SSI) or social security disability (SSDI) benefits. This means that in addition to living with a disability, people with disabilities often struggle with the stresses of acute poverty, including the inability to afford decent and safe housing of their own choosing in the community.

Income data collected indicates that approximately 60 percent of people with a psychiatric disability receiving services from the county are on SSI, SSDI, or other forms of public assistance, receiving around \$500/month. 75 percent of these individuals have incomes below \$10,000/year. The crisis facing people with developmental disabilities is equally as severe with close to 90 percent of consumers living on some form of public assistance, and 80 percent of these adults living on incomes of less than \$10,000 a year. In a community with a median household income of \$43,407, these individuals are extremely low income (between 13% and 20% of median area income) and have little or no buying power in the housing market. Median rents in the lower cost areas are between \$450-500 a month—a rental expense that would consume the majority, if not all, of the monthly income of an individual with a disability living alone. Consequently, permanent, affordable housing alternatives in the community are close to non-existent.

In addition, waiting lists for long-term residential alternatives are long. Currently, there are approximately 800 adults with developmental disabilities waiting for housing and residential services, and this number continues to grow. As a consequence, many adults with developmental disabilities are unable to move out of quasi-institutional settings, or continue to live at home with family when they are unable to get the supports they would need to live in a more independent setting.

The majority of people with psychiatric or developmental disabilities experience housing problems or housing need in some form: rent burden; overcrowding; substandard housing; inability to move out of an institutional or residential treatment setting beyond the period of need; and homelessness. The costs to both individuals and the service system are great. It is now known that housing stability and housing satisfaction correlate with lower service utilization, particularly inpatient hospitalization days, and rehabilitation. Furthermore, the availability of affordable housing alternatives for people with disabilities reduces reliance on expensive institutional and congregate alternatives beyond the period of individual need.

Homeless

There are currently about 150 homeless individuals with a major mental illness or developmental disability residing within the community. These individuals are living in emergency shelters, in abandoned buildings, or in places not suitable for human habitation. Based on data from outreach programs, approximately 80 percent of these individuals are homeless for the first time, and the remaining 20 percent are chronically homeless, recycling through overcrowded/doubled up housing situations, in-patient facilities, jails, and other temporary accommodations. These homeless people with disabilities have lost all meaningful ties with family, and approximately 70 percent have no previous history with the mental health or developmental disability system. Approximately 40 percent have a secondary diagnosis of episodic or chronic substance abuse. All of these individuals are very low income, relying on entitlements such as SSI or SSDI or are without any stable source of income.

Group Homes, Adult Foster Care, or Board and Care Homes

There are currently 500 people with psychiatric or developmental disabilities residing in large government-funded group homes, adult foster care or board and care homes. Though a formal assessment has not been conducted, it is likely that many of these adults would choose to, and certainly could, live in housing alternatives if

affordable housing and consumer-centered support alternatives were available to them. For some, a lack of safe and affordable housing forces consumers to remain in expensive institutional settings beyond the period of need or preference.

Living Dependently with Family and/or Friends

There are 1,500 adults with psychiatric or developmental disabilities receiving services through the county mental health and mental retardation systems who are living dependently with family or friends. The majority is living as adult dependents with parents, siblings, or other relatives, though many would choose to live independently if other housing options were affordable. As pointed out earlier, because the majority of these adults have incomes of \$10,000 or less, finding safe, affordable housing options in the community is elusive if not impossible. In addition, there is the growing problem of adults with developmental disabilities whose parents are aging and may not be able to care for their children in the future.

Adults Living Alone or Independently

There are approximately 2,000 adults with psychiatric or developmental disabilities who are living alone or independently with family or friends. Though hard numbers are not available, anecdotal evidence suggests that many of these adults experience housing problems. The most common housing problems experienced by consumers are excessive rent burden, with many consumers paying over 50 percent of their income in rent, and/or living in substandard housing, especially unlicensed boarding homes.

Conclusion

These sobering statistics document the severity of the housing crisis facing people with disabilities in the community. Simply put, people with disabilities are too poor to obtain decent and affordable housing unless they have some type of housing assistance. Without affordable housing, people with disabilities continue to live at home with aging parents, in crowded homeless shelters, in "transitional" residential settings such as group homes or board and care homes, in institutions, or are forced to choose between seriously substandard housing or paying most of their monthly income towards rent.



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