



Consolidated Annual Performance and Evaluation Report

CAPER 2022 - 2023

DRAFT

Community Development Program | City of White Plains, NY



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City of White Plains



Community Development



Executive Summary

The 2022-23 Consolidated Annual Performance and Evaluation Report (CAPER) compares the City's budgeted and actual use of Community Development Block Grant (CDBG) funds throughout the 2022-2023 Program/Fiscal Year ("FY 2022") which covers the time period between July 1, 2022 and June 30, 2023. This assessment has been completed in accordance with 24 CFR 91.520(a) and the 2020-24 Consolidated and Citizen Participation Plans.

A. CAPER: A Report on Housing & Community Development Accomplishments

CD – Community Development Program

The White Plains' Community Development (CD) Program provides grant funding to local public service agencies and qualifying businesses, funds public facility and infrastructure improvements, housing code enforcement activities and the Rehabilitation Program. The CD Program has rehabilitated over 4,500 single and multi-family housing units since the program's inception in 1974.

City of White Plains Affordable Rental Housing and Home Ownership Program

The City of White Plains established the Affordable Rental Housing Program (ARHP) and the Affordable Home Ownership Program (AHOP) to increase the availability of affordable housing stock citywide. These programs provide quality affordable housing and support the City's economic vitality.

B. City of White Plains' Overall Community Development Goals

The City of White Plains' five-year Consolidated Plan for 2020-24 states the following goals:

Goal Name	Goal Descriptions
Planning & Administration	Deliver the CDBG projects and activities and meet program administrative requirements
Housing Rehabilitation	<p>Provide a source of funding for the rehabilitation of housing units for the purpose of eliminating existing or incipient code violations, unsafe housing conditions posing a threat to safety and to make emergency repairs.</p> <p><u>Home Rehabilitation Program:</u> Oversight of rehabilitation projects, preparation of specifications and bids, work site monitoring visits, filing of mortgages and deferred liens.</p> <p><u>Home Safety Initiative:</u> Provide smoke and carbon monoxide detectors to eligible households</p>
Code Enforcement	Increase the number of residences complying with local codes to improve housing conditions and the built environment that positively affect property values and overall neighborhood character. Enforcement activities take place in areas where housing is deteriorated or deteriorating and where there are signs of overcrowding or other illegal occupation. Activities also include night canvassing, inspection of properties on the Rental Housing Registry and emergency response
Public Facilities	Investment is necessary for community and public facilities. Capital is needed for acquisition costs, improvements to streets, sidewalks and public infrastructure, removal of architectural barriers and emergency response
Public Services	Support programs that provide assist with housing retention and stabilization, support vulnerable populations or assist in the development of the community or provide job training or comprehensive community services

C. Measuring and Reporting Performance

Reporting Requirement

The City of White Plains is required to prepare action plans and program evaluation reports annually in order to receive Community Development Block Grant (CDBG) funds. This report provides a complete summary of all CDBG funded activities, actions taken to meet goals and objectives stated in the 2020-24 Consolidated Plan and 2022-23 Annual Action Plan, and compares the budgeted amounts with the actual expenditures in FY 2022.

The organization of this document corresponds to HUD's reporting requirements as outlined in 24 CFR Part 91. This report also provides updates on actions taken to further fair housing choice, as outlined in the current Analysis of Impediments (AI).

Citizen Participation

All CDBG related plans and reports are prepared in accordance with the City's current Citizen Participation Plan. CD staff work closely with the Community Development Citizens Advisory Committee (CDCAC) on the development and evaluation of plans, reports, programs and activities. The CDCAC consists of eleven, Mayor appointed, City of White Plains residents. The CDCAC serves three main purposes:

1. To assist the City in assessing the needs of its resident and neighborhoods
2. To hold public hearings on the development and past performance of the Consolidated Plan and annual Action Plans, including funding recommendations for how CDBG funds should be allocated
3. To reflect on the past performance of CDBG projects and programs and make recommendations for improvement

The Mayor's CDCAC appointments provide for representation of low- and moderate-income persons, members of minority groups, non-English speaking persons, persons with disabilities and other persons directly affected by the program.

CR-05 - Goals and Outcomes

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

FY 2022 Accomplishments

In FY 2022, the City of White Plains and its sub-recipients engaged in a number of housing and community development activities. This CAPER summarizes activities taken to implement the City of White Plains' 2020-24 Consolidated Plan and 2022-23 Annual Action Plan.

Summary of the City's FY 2022 accomplishments:

- ✓ Completion of the third program year of the 2020-2024 Consolidated Plan
- ✓ Maintained the program's audience by continuing to post on the [@CD_whiteplains](#) Instagram account. The account has been instrumental in advertising the program's available resources to a wider audience.
- ✓ Recipient of three CD-related grant awards:
 - [Love Your Block](#): Funded through a grant from Bloomberg Center for Public Innovation, mini-grants were awarded to residents and community partners to fund small improvements in neighborhoods to encourage residents to initiate change in their neighborhoods. 19 mini-grant were awarded, all within CDBG target areas.
 - Safe Streets for All Action Planning Grant supports a study in the downtown area, including the CDBG target areas of Downtown South, Eastview, Battle Hill, and Ferris Church. The study will identify opportunities to strengthen safety and better connect residents to the downtown area.
 - Funding was secured to create a pollinator meadow with benches and walking paths in the CDBG target area of Battle Hill. The pollinator meadow responds to environmental justice concerns and creates a serene, healthy space for passive recreation.
- ✓ CDBG staff were invited to present at the National Fair Housing Conference in Washington DC in July 2022. The presentation featured information about the Fair Street USA educational public art exhibit. This exhibit was displayed in the White Plains Public Library Gallery, within a target area and Opportunity Zone, for all of July 2022 and then moved to Court Street as part of a Serious Fun public arts festival in October 2022.
- ✓ The City co-sponsored a regional conference, "Affordable Housing IS Fair Housing", with Westchester Residential Opportunities.
- ✓ The City co-sponsored and hosted the International Drug Overdose Awareness Day that connected individuals and families with support and resources.
- ✓ Ten households in eight structures were rehabilitated this year and fifteen more projects are in the pipeline for the upcoming program year.
 - Forty-two homeowners received home improvement assessments and recommendations from the Neighborhood Housing Rehabilitation Program, although ineligible to participate, homeowners were grateful for the service received.

- ✓ The Community Development Program provided funds to improve sidewalks in the Ferris Church target area ensuring safer routes to school in a low/moderate income community.
- ✓ CDBG funds supported HVAC improvements at a community center located in Downtown South. The new HVAC will facilitate cleaner indoor air quality preventing and responding to the COVID 19 pandemic.
- ✓ Continued funding of Housing Code Enforcement Officers who operate in 2020-30 Code Enforcement Target Areas. Code Enforcement Officers prioritize life safety violations and violations in the built environment.
 - To build on these efforts, grant funds also supported a Neighborhood Conditions Coordinator to connect homeowners facing challenging situations with necessary resources.
- ✓ CD funds supported 26 critical public service programs made available to White Plains residents; these programs addressed general community needs as well as needs related to the COVID-19 pandemic.
- ✓ The One White Plains Comprehensive Planning process continues to highlight the needs of low/moderate income communities including access to affordable housing, job training, public transportation and recreational activities. Affirmative efforts have been made by Community Development staff to engage historically disadvantaged communities in the Comprehensive Plan process.

Comparison of the proposed versus actual outcomes for each outcome measure submitted with the consolidated plan and explain, if applicable, why progress was not made toward meeting goals and objectives. 91.520(g)

Categories, goal outcome indicators, units of measure, Strategic Plan and Annual Action Plan goals, outcomes and percentage completed for each of the grantee’s programs.

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

Goal	Category	Indicator	Unit of Measure	Expected – Strategic Plan (Con Plan)	Actual – Strategic Plan 2020-2022	Percent Complete	Expected – Program Year 2022-2023	Actual – Program Year 2022-2023	Percent Complete
Planning & Administration	Planning & Administration	Other	Other	7	5	71%	2	2	100%
Housing Rehabilitation	Affordable Housing	Homeowner Housing Rehabilitated	Household Housing Units	50	36	72%	8	10	125%
Code Enforcement	Affordable Housing	Housing Code Enforcement/ Foreclosed Property Care	Household Housing Unit	625	395	63%	125	117	94%
Public Facilities	Non-Housing Community Development	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	Persons Assisted	8,000	7,110	89%	1,800	2,395	133%
Public Services	Homeless & Non-Homeless Special Needs	Public Service Activities other than Low/Moderate Income Housing Benefit	Persons Assisted	25,000	18,157	73%	2,000	5,298	265%

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

Providing quality and affordable housing, public facility and infrastructure improvements, housing retention and stabilization efforts, community building and support of vulnerable populations were identified as high priority needs in the 2022-23 Annual Action Plan. The CD Program met all but one goal in FY 2022. The goal for Housing Code Enforcement was not fully met, but all projects are on track to meet their 5-year Strategic Plan goals.

CR-10 - Racial and Ethnic composition of families assisted

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

Table 2 – Table of assistance to racial and ethnic populations, FY 2022-2023 and to Date				
Race	FY 2020-2022	FY 2022-2023	Total Served to Date	Percent
White	7,717	2776	10,493	57.79%
Black or African American	4,175	2393	6568	36.17%
Asian	956	86	1,042	5.74%
American Indian or American Native	7	6	13	0.07%
Native Hawaiian or Other Pacific Islander	4	37	41	0.23%
Total	12,859	5,298	18,157	100%
Ethnicity	FY 2020-2022	FY 2022-2023	Total Served to Date	Percent
Hispanic	3,802	3008	6,810	37.51%
Not Hispanic	9,057	2290	11,347	62.49%
Total	12,859	5,298	18,157	100%

CR-15 - Resources and Investments 91.520(a)*Identify the resources made available***Table 3 – Resources Made Available**

Program & Source of Funds		Resources Made Available: FY 22	Amount Expended: FY 22
CDBG - Federal	HUD Grant Awards & Revolving Fund	\$1,663,472	\$1,718,045
Other - Local	Affordable Housing Program - Other	\$140,000	\$140,000
Other - Local	City of White Plains Local Contribution	\$1,550,000	\$1,550,000

Narrative

The City of White Plains made available \$963,472 in new and reprogrammed CDBG funds in FY 2022.

\$750,704 of new funds and \$50,000 of reprogrammed funds were spent in FY 2022 to support program and rehabilitation administration, housing code enforcement activities, public facility and park improvements, and funds the City's Public Service Grant Program.

The CD program also spent \$609,857 in revolving loan funds in FY 2022; this fund provides low-interest, deferred loans and grants to income eligible homeowners, historic preservation projects, and community facilities as part of the Rehabilitation Program

\$307,484 in CDBG-CV funds (FY2020) were expended by the City of White Plains in FY 2022.

The City contributes \$140,000 of City dollars for the administration of the City's Affordable Rental Housing Program (ARHP)

The City contributes \$1,550,000 of City dollars toward community development activities such as affordable housing, code enforcement, parks, facilities and infrastructure improvements.

Identify the geographic distribution and location of investments.

Table 4 – Identify the geographic distribution and location of investments

Target Area	Planned Percentage of Allocation	Actual Percentage of Allocation
2020-24 Barker	11%	7%
2020-24 Battle Hill	11%	7%
2020-24 Carhart South	11%	7%
2020-24 Downtown South	13%	12%
2020-24 Eastview	12%	7%
2020-24 Ferris-Church	10%	19%
2020-24 Fisher Hill	11%	8%
2020-24 Highlands	11%	11%
2020-24 Kensico-Lake	10%	7%
2020-24 City-wide - low/mod	70%	30%
2020-30 Code Enforcement Areas	10%	7%

Leveraging

Explain how federal funds leveraged additional resources (private, state and local funds), including a description of how matching requirements were satisfied, as well as how any publicly owned land or property located within the jurisdiction that were used to address the needs identified in the plan.

CDBG leverages state, county, local and private funds in a variety of ways. In order to be considered for funding through the CDBG funded Public Service Grant Program applicants must identify other funding sources used to support the project. City run programs such as after school programs, summer camp scholarships and programs with persons for differing abilities are in part supported with local funds. El Centro Hispano and the Thomas H. Slater Center also receive funding through Westchester County. Code enforcement is supported by CDBG, local and New York State funds. The Rehabilitation Program uses additional funds from NYS Affordable Housing Corporation to assist households in the Rehabilitation Program.

CR-20 - Affordable Housing 91.520(b)

Evaluation of the jurisdiction's progress in providing affordable housing, including the number and types of families served, the number of extremely low-income, low-income, moderate-income, and middle-income persons served.

Table 5 - Number of Households		
	One-Year Goal	Actual
Number of homeless households to be provided affordable housing units	211	226
Number of non-homeless households to be provided affordable housing units	4,904	4,740
Number of special-needs households to be provided affordable housing units	402	433
Total	5,517	5,339

Table 6 - Number of Households Supported		
	One-Year Goal	Actual
Number of households supported through rental assistance	5,211	5,015
Number of households supported through the production of new units	298	374
Number of households supported through the rehab of existing units	8	10
Number of households supported through the acquisition of existing units	0	0
Total	5,517	5,399

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

There were 5,339 households supported in FY 2022 representing 97% of the projected goal. The greatest increase in affordable units were produced through set-asides required through the City's Affordable Rental Housing Program.

The enduring impact of the COVID-19 pandemic continues to cause housing prices to surge throughout the NY Metro region. Despite the Program's success in creating new affordable units, the need for affordable housing, specifically for the lowest income residents remains high.

Discuss how these outcomes will impact future annual action plans.

As previously stated, the COVID-19 pandemic dramatically increased housing prices and created unprecedented housing instability disproportionately impacting the City's most vulnerable residents.

The City continues to research the most effective way to utilize designated affordable housing assistance funds to increase affordable housing opportunities.

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

Table 7 - Number of Persons Served

CDBG Income Categories	FY 2020-2022	FY2022-2023	Total Served to Date (2020-2023)	Percent
Extremely Low-Income	5,491	2,923	8,414	50%
Low-Income	4,204	1,672	5,876	35%
Moderate-Income	2,011	585	2,596	15%
Total	11,706	5,180	16,886	100%

CR-25 - Homeless and Other Special Needs 91.220(d, e); 91.320(d, e); 91.520(c)

Evaluate the jurisdiction's progress in meeting its specific objectives for reducing and ending homelessness through:

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

The City of White Plains has a strong partnership with Lifting Up Westchester (LUW), a major provider of services to homeless adults in White Plains. The LUW Homeless Outreach team works successfully with:

- Chronically homeless men and women who have refused, or are unable, to participate in treatment programs or complete the documentation that would make them eligible for housing and other services provided by the Department of Social Services; and
- Individuals who are temporarily homeless, perhaps as a result of the pandemic, who have not entered into the DSS system for a variety of reasons.

Many of the clients targeted suffer from substance abuse, mental illness, HIV/AIDS, or have co-occurring disorders while others have been recently released from incarceration and are now on parole. Between July 1 2022 and June 30 2023, 382 individuals received services from the Outreach team.

The Westchester County Continuum of Care completed the Point in Time (PIT) Count in January of 2023. There were 16 unsheltered people in 2023 as compared to 22 people in 2022 and 25 people in 2021; averaging 16 unsheltered persons per year over the past 6 years. It is likely that the increases in 2021 and 2022 were related to the aftermath of the COVID-19 pandemic, and we are hopeful that as the pandemic abates that the numbers will also stabilize to their pre-2020 rates.

Addressing the emergency shelter and transitional housing needs of homeless persons

The City of White Plains is on the board of the Westchester County Continuum of Care (CoC) a planning group for allocating funding for transitional and supportive housing, including White Plains facilities. The core planning participants in the CoC are the cities of Yonkers, Mt. Vernon, White Plains, and New Rochelle, and the County of Westchester. Westchester County and not-for-profit shelter operators have been successful in eliminating the homeless population staying in hotels and motels. The City has regularly increased the number of emergency shelter beds from November to April to address those who are homeless seeking shelter during the cold months.

As of the January 2023 PIT Count there were 336 homeless individuals housed in emergency shelters in White Plains. 259 of these individuals were housed at the Coachman family shelter and the remainder (77 single individuals) at LUW's Samaritan House and Open Arms shelters.

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

Public Service agencies such as Lifting Up Westchester, Westchester Residential Opportunities, Ecumenical Emergency Food Pantry of White Plains, White Plains CAP/WestCOP, Trinity United Methodist - Food Distribution, the White Plains Youth Bureau, and the Bridge Fund of Westchester are at least partially funded by CDBG funds to stabilizing local housing and help vulnerable populations avoid becoming homeless.

The White Plains Youth Bureau provides many services for White Plains youth, especially those facing socio-economic challenges. The Youth Bureau's services are tailored to meet the individual's specific needs; children served often face issues with poverty and hunger. The Youth Bureau also operates a community garden program to stock the Food Pantry, which is given to families in need. Food unsold at the White Plains' Farmers Market is also donated and distributed through the Youth Bureau. Food is distributed to children in public housing and low-income environments who would otherwise have very little food to eat when they are home on weekends.

Helping homeless persons (especially chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth) make the transition to permanent housing and independent living, including shortening the period of time that individuals and families experience homelessness, facilitating access for homeless individuals and families to affordable housing units, and preventing individuals and families who were recently homeless from becoming homeless again.

According to 2022 data from the homeless housing providers, there are seventeen units of Permanent Supportive Housing (PSH) and 2 units of Rapid Rehousing (RRH) for single adults in White Plains. These units are managed by Lifting Up Westchester, Human Development Services of Westchester, Mental Health Association of Westchester, Lexington Center, Guidance Center, and Westhab through subcontracts with the Westchester County Department of Community Mental Health and the Department of Social Services and the Mount Vernon Urban Renewal Agency under HUD CoC grants. In addition, there are seven permanent units for homeless families managed by the Housing Action Council. These permanent housing units, coupled with the City's inventory of 100 transitional housing units represent a significant stock of housing with accompanying support services for those exiting shelter in White Plains.

Approximately 20% of those in shelter in Westchester County last year successfully exited to permanent housing and 99% of those in permanent supportive housing retained that housing. While there is a continuing need for more supportive housing (and affordable housing in general) for those emerging from shelter, the City continues to make progress in permanently exiting the homeless from shelters into the community.

CR-30 - Public Housing 91.220(h); 91.320(j)*Actions taken to address the needs of public housing*

The White Plains Housing Authority (WPHA) is an independent Public Housing Agency that serves the public and affordable housing needs for the City of White Plains. The goal of WPHA which is supported by the Federal Quality Housing and Work Responsibility Act of 1998 is to allow for more economic integration and de-concentration in public housing; encourage and reward work; provide protection of those in need; and expand the number of units accessible to low income families in cooperation with new housing choice vouchers.

The Authority is designated as a “Standard Performer” by the Department of Housing and Urban Development (HUD).

The Authority is considered a “medium sized” agency currently providing oversight, asset management and/or property management for an 865 unit affordable housing portfolio. WPHA controls 360 units of conventional HUD-subsidized low-rent public housing units and 805 “Section 8” Housing Choice Voucher Units. These units are located throughout the City in three separate developments - Brookfield Commons/Winbrook, Lakeview Apartments and the Schuyler-DeKalb Apartments.

The WPHA continues to convert public housing to Section 8 supported Rental Assistance Demonstration (RAD) program. Additionally, WPHA continues redeveloping the Winbrook property as Brookfield Commons, a mixed-income housing development. Phase II of Brookfield Commons, located at 135 South Lexington Avenue, was completed in FY 2021 and the Phase III development was approved by the City in August 2023. Construction is expected to begin soon. Following completion of all phases, the Winbrook property will be removed from the HUD public housing inventory.

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

WPHA staff encourages residents to participate in homeownership programs offered through partnering agencies. Participants in these programs receive assistance with credit repair and money management to help prepare them for the next steps in homeownership. In addition the City worked with the WPHA as part of the Love Your Block program on a resident directed initiative that included advocacy for better traffic safety and a commemorative plaque installation and ceremony.

Actions taken to provide assistance to troubled PHAs

The White Plains Housing Authority has not been designated as troubled.

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

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

1. In June 2021, the City launched the "One White Plains" Comprehensive Plan planning process. Spearheaded by the Comprehensive Plan Committee, the planning process involved a robust public participation effort, garnering thousands of comments from public workshops, on-line surveys and listening tours. The plan covers six planning elements entitled connectWP, greenWP, liveWP, playWP, strengthenWP and workWP. Each element contains topics such as transportation and mobility, sustainability and resilience, housing and land use, recreation and historic resources, city services, and economic development. Following the completion and approval of the plan (2024), the City will begin to implement the myriad initiatives pertaining to each element and in accordance with the Plan's community-driven vision. In particular, liveWP recommends providing "missing middle" housing opportunities as well as accessory dwelling units to provide a more affordable range of housing options in White Plains.
2. The City amended its Affordable Rental Housing Programs Rules and Procedures in May 2019. The following changes were effective September 1, 2019:
 - All multi-family buildings with 10 or more units are required to designate a certain percentage of affordable units as affordable;
 - The minimum number of units required to be set aside as affordable was increased from 6% to 8% of the total number of units in the project;
 - The minimum eligible income decreased to 50% AMI from 60% AMI;
 - The priority system was eliminated from the program;
 - A household asset limit was established; and
 - A buy-out option was established - allowing developers to buy-out of up to 25 units of their affordable housing obligation through a payment to the Affordable Housing Assistance Fund
 - The Planning Department continues to explore ways to use the Affordable Housing Assistance Fund to further housing affordability citywide, such as down-payment assistance and loans/grants for development of affordable housing
3. The CD Program continues to follow updated internal guidelines for the Rehabilitation Program, the updated guidelines provide for owner-occupied multi-family units such as condominium and cooperative units to be eligible for rehabilitation assistance through the program - more households will now be eligible for the program.
4. The City continues to participate in Senior Citizen Rent Increase Exemption (SCRIE) program to provide rent increase exemptions to our senior population.
5. The City continues to participate in Disability Rent Increase Exemption (DRIE) program to provide rent increase exemptions to our disabled population.

6. The City continues to follow an established inter-department protocol for identifying properties in need of maintenance and repairs, and connects eligible property owners or landlords with assistance.
7. In partnership with Westchester Residential Opportunities (WRO), the City continues to maintain a list of apartment listings and senior housing resources, connecting residents with safe and affordable housing options.
8. In 2020, the City added the Neighborhood Conditions Coordinator position, to connect residents struggling with housing issues with available resources.
9. The City maintains a Rental Housing Registry for multi-family buildings to reduce instances of overcrowding and other illegal housing practices.
10. Throughout the COVID-19 pandemic, City staff advocated on behalf of residents struggling with pandemic-related concerns.
11. In 2023 the City established a Climate Smart Communities coordinator and successfully completed high impact actions to become a NYS Bronze Certified Clean Energy Community. Many of the high impact actions had an equity component such as investing in publicly accessible EV chargers in low/moderate income communities.
12. The City was one of three municipalities in the County that housed asylum seekers in Spring 2023.
13. The White Plains Mayor vocally supported the Governor's state-wide proposal to increase the supply of affordable housing state-wide.

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

Limited and decreased formula grant funding have continued to be the greatest obstacle to meeting underserved needs. Results from the community engagement process and data analysis show that housing, supportive services and community development needs remain unmet. Community Development staff seek out additional funding sources to provide services ineligible for CDBG support. COVID relief funds were instrumental in the program's ability to provide a wider variety of services to the community.

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

A New York State law enacted in 1993 requires that all children from six months to six years be tested for lead-based paint poisoning as part of their physical examinations. Further, the Westchester County Department of Health requires that all children between one and two years of age be tested for lead-based paint poisoning as part of their physical examinations. Through a cooperative program established in 1993 between the Westchester County Department of Health and the City's Community Development Program, the City is notified when a child is found to have elevated levels of lead in the blood. Remediation in the home is then pursued.

The Community Development Program works to educate property owners of lead-based paint hazards by providing HUD's lead notification sheet, available in both English and Spanish. The CD Program also provides low-interest or deferred loans to eligible households for lead-based paint abatement through the Rehabilitation Program. Rehabilitation projects are assessed and, if necessary, tested for lead-based paint. If lead-based paint is present, remediation

becomes the project's priority. Ineligible households are referred to the Westchester County Department of Health.

Property owners utilizing the Program's low-interest or deferred loans must work with a contractor certified in lead-based paint removal and have a copy of their certification on file. The Westchester County Department of Health also provides guidelines for safe removal and provides residents with information on nearby testing labs and public health care facilities.

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

The City's anti-poverty strategies are supported through the CD program's Public Service Grant Program. The City provides grant funding to more than 10 public service agencies each program year. The City partners with agencies that work directly with low-income families to provide necessary services to reduce the effects of poverty. For example, food pantries and youth programs are funded to reduce the risk of poverty for individuals and families and to engage and empower White Plains youth. Job training programs assist low income individuals in developing skills to launch more lucrative careers paths. These services address the needs identified in the 2022-23 Annual Action Plan and 2020-24 Consolidated Plan, as amended.

According to the 2017-2021 American Community Survey 5-year estimates, 5.2% of families and 8.4% of White Plains residents earned income that fell below the national poverty level. These data show a very slight increase in poverty for families (0.3%) but an overall decrease in poverty for residents as a whole (-14.2%) from the 2016-20 ACS rates.

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

The CD Program strengthened the City's institutional delivery structure through the development of the 2020-24 Consolidated Plan and its subsequent substantial amendment.

The program continues to work collaboratively with a wide network of City departments, community organizations, community and governmental committees and task forces, and other levels of government in an effort to provide the greatest opportunity to achieve mutually held housing and community development goals. These partnerships were instrumental in understanding the needs of vulnerable residents throughout the pandemic.

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

The City's Planning Department leads the collaborative effort between public and private housing and social service agencies. CD Program staff in particular have developed relations with Westchester's Continuum of Care and the White Plains Housing Authority, as well as other local government entities and agencies providing local homeless care. Additionally, Planning Department staff administers the City's Affordable Housing Program and the SCRIE/DRIE rent subsidy program. These relationships are integral to strategic planning and coordination of services citywide.

CD staff participate in a bi-weekly meeting convened by the White Plains Housing Authority to strengthen services to their residents. As part of this meeting, the City shares available resources and connects residents with these resources. CD staff also participate in a monthly Continuum of Care meeting and sub-committee meeting as possible.

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

The following actions were taken in 2022-23 to address impediments to fair and affordable housing:

- Completed a project funded through HUD's Fair Housing Initiatives Program that educated the community about fair housing challenges and how to seek assistance. Presented at a national conference about the project.
- Continued funding for Westchester Residential Opportunities and the Bridge Fund of Westchester to provide eviction prevention services by paying rental or mortgage arrears and over due utilities for qualifying households
- Continued funding for El Centro Hispano to address issues of overcrowded housing, employment, and general quality of life, and to provide information about the availability of community services to White Plains Hispanic population
- The City maintains a Rental Housing Registry for multi-family buildings to reduce instances of overcrowding and other illegal housing practices. In FY 2019, CD and City staff began inspecting these properties for adequate safety conditions - these efforts continue.
 - The City continues to follow an established inter-department protocol for identifying properties in need of maintenance and repairs, and connects eligible property owners or landlords with assistance
- Continue to operate the City of White Plains Affordable Home Ownership Program
 - The City is in the process of developing new Affordable Home Ownership Program Rules and Procedures. At this time the rules and procedures have not been finalized but will increase affordable housing options throughout the City
- The White Plains Common Council amended the Affordable Rental Housing Program guidelines in May 2019, the amendment was necessary to:
 - require a set aside in all developments 10 units and over, City-wide
 - amend the eligible income range from 60% - 100% AMI to 50% - 80% AMI
 - establish a "buy-out" option for up to 25 of the required units – the funds are placed in the Affordable Housing Assistance Fund to be used for the development of affordable housing as well as down-payment assistance
 - eliminate the applicant "priority system"
- Worked with County Planning Department to help site an LGBTQ+ friendly senior housing development within downtown White Plains.
- Regularly disseminates information regarding resources for affordable home ownership newly made available through Westchester County resources
- Regularly disseminates affordable apartment listings and senior housing resources for White Plains
- The City continues to participate in Senior Citizen Rent Increase Exemption (SCRIE) and Disability Rent Increase Exemption (DRIE) programs to provide rent increase exemptions to our senior and disabled population

- Co-sponsorship of a county-wide conference entitled “Affordable Housing IS Fair Housing”
- City of White Plains website updates to improve access and information regarding fair and affordable housing including:
 - improved website design and user function
 - interactive affordable unit locator map
 - online fillable and submit-able Affordable Rental Housing Program application & recertification forms
 - additional resources for: local senior housing, homeowner assistance programs, local and county Section 8 offices, county-wide housing counseling agencies

CR-40 - Monitoring 91.220 and 91.230

Describe the standards and procedures used to monitor activities carried out in furtherance of the plan and used to ensure long-term compliance with requirements of the programs involved, including minority business outreach and the comprehensive planning requirements

The City of White Plains monitors sub-recipients twice annually, once for observation of services or programs subsidized by CDBG and again to perform an administrative monitoring to review the sub-recipients' annual financial audit reports. Monitoring site visits are coordinated with sub-recipients, members of the Community Development Citizens Advisory Committee (CDCAC) and the City's grant administrator.

Monitoring ensures that the sub-recipient understands the regulations, procedures and responsibilities associated with implementation of approved CDBG activities. Sub-recipients are made aware of the monitoring plan and process upon contract execution. Sub-recipients typically receive a formal notification from the City regarding an upcoming monitoring visit and the sub-recipients are required to cooperate with the grant administrator in completing the monitoring in compliance with HUD regulations.

The monitor observes the following:

1. Are CD funds being distributed appropriately?
2. Are grantees carrying out activities and certifications in accordance with HUD requirements and the grant agreement?
3. Are grantees carrying out activities and certifications in a timely manner?
4. Are there issues with the grant, reporting, and/or are there other problems to be addressed?
5. Is the grantee complying with administrative and financial record keeping as required?
6. Does the grantee have the administrative capacity to administer the grant award?

Citizen Participation Plan 91.105(d); 91.115(d)

Describe the efforts to provide citizens with reasonable notice and an opportunity to comment on performance reports.

Community Development Citizens Advisory Committee

Throughout the 2022-23 FY, the committee provided assistance with the review, development and implementation of program activities. The Committee consulted on the 2020-24 Consolidated Plan, Annual Action Plan and CAPER. The CDCAC works to assess community needs, hosts public hearings and represents the voice of White Plains residents throughout planning and implementation of the City's Community Development Program.

The Committee was comprised of the following White Plains residents in FY 2021: Kenneth J. Creary, Chair; Millie Castro; Sidia Cortes; William Brady; Mary Perri; Soknan Han Jung; Marie Houston; Stephen Walfish; Nicole Johnson; Jonna Robins and Charlene Raynor.

The CDCAC hosted the following opportunities for citizen participation:

White Plains Community Development Citizens Advisory Committee 2022-23 Meeting Schedule			
Date	Time	Location	Description
December 7, 2022	1:00 PM	70 Church St.	CD Public Service Program Application Workshop (Optional for CDCAC Members)
December 7, 2022	6:00 PM	70 Church St.	Public Service Program - Virtual Member Orientation
December 9, 2022	11:00 AM	70 Church St.	CD Public Service Program Application Workshop (Optional for CDCAC Members)
January 26, 2023	6:30 PM	255 Main St.	Public Hearing: Public Service program applicant presentations, review of past year's program performance, public input on Annual Action Plan
February 8, 2023	6:00 PM	70 Church St.	CDCAC Committee Meeting: Funding Recommendation Decision Night
April 4, 2023	6:30 PM	255 Main St.	Public Hearing: Public comment on Draft Annual Action Plan, Projects and Activities
September 5–20, 2023	--	--	Public comment period for CAPER (15 days)
September 11, 2023	6:30 PM	255 Main St.	Public Hearing: Public hearing on 2022-23 CAPER

CR-45 - CDBG 91.520(c)

Specify the nature of, and reasons for, any changes in the jurisdiction's program objectives and indications of how the jurisdiction would change its programs as a result of its experiences.

The work done to prepare the 2020-24 Consolidated Plan and subsequent amendment ensured planned activities for FY 2022 aligned with the resources available. FY 2022 marks the completion of the third year of the 2020-24 Consolidated Plan; all but one goal was met or surpassed this year. Note, the Home Code Enforcement goal is on track to meet their 5-year Strategic Plan target.

Does this Jurisdiction have any open Brownfields Economic Development Initiative (BEDI) grants?

No

DRAFT