

Town of Summerville, SC
Community Development Block Grant Program

Consolidated Annual Performance and Evaluation Report
(CAPER)



Program Year 2016
July 1, 2016—June 30, 2017



Town of Summerville
Consolidated Annual Performance and Evaluation Report (CAPER)

Prepared for:

United States Department of Housing and Urban Development
Residents of the Town of Summerville

Prepared by:

Town of Summerville
200 South Main Street
Summerville, SC 29482-6000

The Town of Summerville does not discriminate on the basis of age, race, color, religion, sex, national origin, disability or familial status in the admission or access to, or treatment or employment in its federally assisted programs or activities.

CDBG Grant Administration Contact Information

Grantee Name	Town of Summerville, SC
Contact Person	Kayla Halberg
Title	Grants Writer
Address	200 South Main Street Summerville, SC 29483
Phone	(843) 851-4234
Fax	(843) 695-6029
E-Mail	khalberg@summervillesc.gov

Authorized Official	Colin Martin
Title	Town Administrator
Address	200 South Main Street Summerville, SC 29483
Phone	(843) 851-4201
Fax	(843) 695-0634
E-Mail	cmartin@summervillesc.gov

Grantee Website	http://www.summervillesc.gov/
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Note: The pages herein outline and summarize the programmatic accomplishments and financial expenditures that occurred during the Town of Summerville's 2016 CDBG Program Year. The Town's progress towards achieving the goals identified in its Five-Year Consolidated Plan is also evaluated within this document.

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CR-05 - Goals and Outcomes

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

This could be an overview that includes major initiatives and highlights that were proposed and executed throughout the program year.

Program year 2016 is the Town of Summerville's seventh year of participation in the CDBG program as an entitlement jurisdiction, and the second program year of its 2015-2020 Consolidated Plan. HUD awards grants annually on a formula basis to entitlement community grantees to carry out a wide range of community development activities that principally serve low-and-moderate-income persons. During program year 2016, the Town was awarded \$237,173 for approved projects and activities. Each HUD-funded activity must meet one of three national objectives: benefit low- and moderate-income persons, aid in the prevention or elimination of slums or blight, or meet an urgent community need. HUD also uses program outcomes including creating a suitable living environment, providing decent affordable housing, or creating economic opportunities to further define and measure the achievements of CDBG-funded projects. HUD uses the following to measure program outcomes: Availability/Accessibility, Affordability, and Sustainability.

The Town of Summerville allocated the majority of its 2016 entitlement grant to the construction of sidewalks on West 2nd North Street, which meets the Low-Moderate Area National Objective and focuses on the Suitable Living Environment objective and Availability/Accessibility outcome. Once complete, this project will provide pedestrian access to community services and facilities for the residents of this low-and-moderate income census tract. At the close of the 2016 program year, the production of construction drawings is nearly complete, and the construction of the sidewalks is scheduled to begin during the fall of 2017.

The Town of Summerville allocated 2016 CDBG funds toward program administration to include activities such as staff training, newspaper advertisements, postage, and other direct administrative costs. During program year 2016, the Town also performed Analysis of Impediments to Fair Housing Study using funds allocated for program administration. The Berkeley-Charleston-Dorchester Council of Governments conducted the study, which includes a housing market analysis and needs assessment, as well as potential impediments to fair housing that exist within the Town. The report culminated in a set of recommendations for overcoming

those potential impediments and actionable steps for affirmatively furthering fair housing.

The Town also completed Phase I of the Hutchinson Square Revitalization Project during program year 2016. The Hutchinson Square Revitalization Project is a multi-phase project that, once completed, will create an accessible, livable, and safe community space serving Summerville’s low-and-moderate-income residents. The Square, located at the center of the Town’s historic and business district, hosts a variety of free community events throughout the year including musical performances, monthly “Third Thursday” events hosted by the local Main Street organization, an annual tree lighting, holiday parades, and “Scarecrows in the Square” in the Fall. As the heart of the historic and business district, the revitalization of the Square also has the potential to boost economic development and promote community revitalization throughout the historic district.

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, priority levels, funding sources and amounts, outcomes/objectives, goal outcome indicators, units of measure, targets, actual outcomes/outputs, and percentage completed for each of the grantee’s program year goals.

Goal	Category	Source / Amount	Indicator	Unit of Measure	Expected – Strategic Plan	Actual – Strategic Plan	Percent Complete	Expected – Program Year	Actual – Program Year	Percent Complete
Homeless Assistance	Homeless	CDBG: \$	Homeless Person Overnight Shelter	Persons Assisted	200	0				
Homeless Assistance	Homeless	CDBG: \$	Overnight/Emergency Shelter/Transitional Housing Beds added	Beds	0	0	0.00%	0	0	0

Homeless Assistance	Homeless	CDBG: \$	Homelessness Prevention	Persons Assisted	0	0	0.00%	0	0	0
Provide Decent, Affordable Housing	Affordable Housing		Homeowner Housing Added	Household Housing Unit	2	1	50.00%	0	0	0
Provide Street Infrastructure Improvements	Non-Housing Community Development	CDBG: \$212,173	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	Persons Assisted	5572	5572	100.00%	5572	0	0.00%

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

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.

Each project funded in the 2016 Annual Action Plan met priority needs and key goals that were identified during the development of the Town's 2015-2020 Consolidated Plan. Citizen participation is important to the development of the Town's Annual Action Plan. In prior years, citizens expressed a desire to have funding allocated to projects that would benefit the largest number of low-and-moderate-income residents. During the development of the Consolidated Plan, citizens mentioned the need for infrastructure improvements, including additional sidewalks in the neighborhoods within Census Tract 107. Based on the information gathered through the citizen participation process, the Town determined that the West 2nd North Street Sidewalk project was a priority need and an appropriate use of CDBG funds. The project will meet the Consolidated Plan goal to Provide Street Infrastructure Improvements.

During program year 2016, the Town of Summerville also expended CDBG funds from previous year entitlement grants allocated toward the Hutchinson Square Revitalization project. Hutchinson Square is located in the center of the Town, directly adjacent to Town Hall facilities, and is the heart of the town's historic business district, making it an ideal area for revitalization and economic development. The Square is also located in Census Tract 107, which includes 5,428 residents, 49.77% of whom are low-to-moderate-income individuals (ACS 2011-2015 estimates). The revitalization of Hutchinson Square will meet several listed goals of the Consolidated Plan including: LMI Community infrastructure improvements, LMI Streetscape and Lighting Improvements, and LMI Recreational and Community Facilities.

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)**

	CDBG
White	3078
Black or African American	2187
Asian	0
American Indian or American Native	58
Native Hawaiian or Other Pacific Islander	0
Total	5,428
Hispanic	76
Not Hispanic	3056

Table 2 – Table of assistance to racial and ethnic populations by source of funds

Narrative

During program year 2016, eighty-nine percent (89%) of CDBG funding was allocated for Census Tract 107. Based on American Community Survey data for 2011-2015, Census Tract 107 includes approximately 5,428 residents, with an estimated 49.77% of whom are low-and-moderate income persons (LMI data provided by HUD LMISD, 2014: <http://hud.maps.arcgis.com/apps/Viewer/index.html?appid=9642c475e56f49efb6e62f2d8a846a78>).

The racial/ethnic profile of Census Tract 107 is as follows:

White= 56.7%

Black or African American= 40.3%

American Indian and Alaska Native= 1.1%

Asian= 0%

Native Hawaiian and Other Pacific Islander= 0%

Two or More Races= 1.9%

Hispanic or Latino origin (of any race)= 1.4%

CR-15 - Resources and Investments 91.520(a)

Identify the resources made available

Source of Funds	Source	Resources Made Available	Amount Expended During Program Year
CDBG	CDBG	237,173	234,538.78

Table 3 - Resources Made Available

Narrative

The Town received \$237,173 in CDBG funding to undertake projects planned for program year 2016. This amount represented 100% of the total federal resources available to the Town to undertake projects outlined in the 2016 Annual Action Plan, and approximately 20% of the total resources made available for the 2015-2019 Consolidated Plan. The Town committed to covering any project overages with other revenue sources available to the Town including general operating funds and/or other grant revenue sources. The Town also had \$256,359.77 in unexpended funds remaining following Program Year 2015, making \$493,532.77 available to the Town during program year 2016 to complete projects funded in years 2014-2016.

During program year 2016, the Town expended a total of \$234,538.78 in CDBG funds that were associated with several projects encompassing grant years 2014-2016. Expenditures were allocated as follows:

\$3,475.25 of the 2014 CDBG allocation was spent during program year 2016 as follows:

- \$3,475.25 on Architectural/Engineering/Design costs associated with the Hutchinson Square Revitalization Project

\$201,399.42 of the 2015 CDBG allocation was spent during program year 2016 as follows:

- \$199,405.87 for Phase I-Utilities construction services for Hutchinson Square Park.
- \$1,993.55 for CDBG program administration costs.

\$29,664.11 of the 2016 CDBG allocation was spent during program year 2016 as follows:

- \$17,549.40 for engineering/design costs for the West 2nd North Street Sidewalk Project.

- \$9,688.15 for the consultation fees for the production of the Analysis of Impediments to Fair Housing
- \$2,426.56 for CDBG program administration costs.

See Attachment 1, IDIS PR 03, for a complete CDBG Activity Summary Report for program year 2016. This report provides a detailed breakdown and description of all expenditures associated with CDBG funded projects that were open and active during program year 2016. See Attachment 2, PR26 CDBG Financial Summary Report, for detailed information regarding program year 2016 expenditures.

Identify the geographic distribution and location of investments

Target Area	Planned Percentage of Allocation	Actual Percentage of Allocation	Narrative Description
Brownsville Neighborhood			
Census Tract 107	89	89	Area Improvements

Table 4 – Identify the geographic distribution and location of investments

Narrative

Eighty-nine percent (89%) of Program Year 2016 CDBG funds were directed toward the construction of sidewalks along West 2nd North Street. West 2nd North Street is located within Block Group 2 of Census Tract 107, which includes approximately 1,647 persons, 56% of whom are LMI. Census Tract 107, Block Group 2 has a racial make-up of approximately 59% white and 41% Black or African American.

Census Tract 107 was identified as a geographic priority area in the 2015-2020 Consolidated plan. Overall, the Census Tract is approximately 49.77% LMI, meeting Summerville’s exception grantee percentage threshold of 44.66% to qualify as a low-and-moderate income area. The West 2nd North Street project is located near the heart of downtown Summerville and is within walking distance to several community facilities, public services, public transportation stops, grocery stores, and job centers. The construction of pedestrian infrastructure along West 2nd North Street will provide residents living in the community with safe, reliable, and ADA compliant access to these community facilities.

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.

During program year 2016, CDBG funds were used to leverage additional resources through several sources including the Town's general operating budget, private foundation grants, and other federal grant programs. In 2014 and 2015, the Town received a grant from a local private foundation, the Saul Alexander Foundation of the Coastal Community Foundation, to help support the costs of the Hutchinson Square Revitalization Project. Hutchinson Square Park is publically owned land that is maintained by the Town of Summerville for the benefit of citizens and for use at community events, such as the Town Christmas tree lighting, holiday parades and monthly third Thursday events. The revitalization of the square will allow the Town to leverage the use of this property for such programs that help build bring the community together.

The Town also received an Urban and Community Forestry grant of \$12,000 from the South Carolina Forestry Commission to assist in the development of a Green Infrastructure Plan that will provide increased access to bike paths, sidewalks, and nature paths, and will promote open space, sustainable development, and water quality for residents. Implementation of these initiatives will provide low-and-moderate-income residents with increased opportunity and access to recreational and wellness areas, economic opportunities, and transportation. This grant required a 50% match that will be provided through a \$300 cash match from the Town's general fund, and \$11,786 in in-kind match (employee and volunteer time and services).

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.

	One-Year Goal	Actual
Number of Homeless households to be provided affordable housing units	0	0
Number of Non-Homeless households to be provided affordable housing units	0	0
Number of Special-Needs households to be provided affordable housing units	0	0
Total	0	0

Table 5 – Number of Households

	One-Year Goal	Actual
Number of households supported through Rental Assistance	0	0
Number of households supported through The Production of New Units	0	0
Number of households supported through Rehab of Existing Units	0	0
Number of households supported through Acquisition of Existing Units	0	0
Total	0	0

Table 6 – Number of Households Supported

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

The Town of Summerville did not allocate 2016 CDBG funds toward the provision of affordable housing; therefore, goals and actual measurements for this section are not applicable.

Discuss how these outcomes will impact future annual action plans.

The Town of Summerville did not allocate 2016 CDBG funds toward the provision of affordable housing. The 2015-2020 Consolidated Plan includes the goal to provide homeless assistance to 200 persons over five years and to provide Decent, Affordable Housing to approximately 2

households. These goals will be addressed through homeless assistance and affordable housing projects in future program years.

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.

Number of Households Served	CDBG Actual	HOME Actual
Extremely Low-income	0	0
Low-income	0	0
Moderate-income	0	0
Total	0	0

Table 7 – Number of Households Served

Narrative Information

During program year 2016, the Town of Summerville did not allocate CDBG funds directly toward the provision of affordable housing. The Town did, however, complete an updated Analysis of Impediments to Fair Housing Study. The study included a needs assessment and market analysis that will help the Town prioritize the use of its CDBG funds for affordable housing initiatives. Additionally, the AI provided recommendations for overcoming existing and potential impediments to fair housing.

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

During program year 2016, the Town did not specifically allocate funding toward reducing homelessness. While no CDBG funds were allocated for homeless assistance during 2016, the Town established a goal to provide assistance to homeless persons through partnership with the local homeless shelter in its 2015-2020 Consolidated Plan. During program year 2016, the Town provided direction to the local homeless shelter on the steps necessary to build the administrative capacity required in order to properly carry out and manage CDBG-funded programs. Because of this outreach effort, the Dorchester County Community Outreach has taken the steps necessary to become a subrecipient for future program years. The Town of Summerville has also been involved in the efforts to eliminate homelessness in the greater Charleston-Metro region through participation in the Mayors' Commission on Homelessness and Affordable Housing, which is promoting HUD sponsored initiatives including the Housing First Model.

Addressing the emergency shelter and transitional housing needs of homeless persons

The Town did not use CDBG funds to address the emergency shelter and transitional housing needs of homeless persons during program year 2016.

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

During program year 2016, the Town did not allocate CDBG funds toward homelessness prevention. As a member of the Mayors' Commission on Homelessness and Affordable Housing, the Town of Summerville's Grants Writer has become more familiar with the various social services, mental health and traditional health care facilities, and housing providers throughout the area, and is well equipped to respond to questions from the community on where to go for more information when needs arise.

Helping homeless persons (especially chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth) make the transition to permanent housing and independent living, including shortening the period of

time that individuals and families experience homelessness, facilitating access for homeless individuals and families to affordable housing units, and preventing individuals and families who were recently homeless from becoming homeless again

The Town did not use CDBG funds for Homeless Assistance during program year 2016.

CR-30 - Public Housing 91.220(h); 91.320(j)

Actions taken to address the needs of public housing

Public Housing needs were not addressed in the 2016 Annual Action Plan. The Town of Summerville does not have a municipal housing authority or a formal partnership agreement with any other local public housing agency. Housing authorities in the Charleston Metropolitan Area include Charleston County, the City of North Charleston and the City of Charleston. The operational authority of these agencies does not extend to the Town of Summerville. South Carolina Regional Housing Authority #3 administers and serves Dorchester and Berkeley Counties and the Town with Tennant Based Assistance through the Section 8 Voucher Program.

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

N/A- The Town of Summerville does not have a municipal housing authority or a formal partnership agreement with any other local public housing agency.

Actions taken to provide assistance to troubled PHAs

N/A- The Town of Summerville does not have a municipal housing authority or a formal partnership agreement with any other local public housing agency.

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)

The Town is currently in the process of completing a comprehensive redevelopment of its zoning ordinances. This new Unified Zoning Ordinance will help ensure that building ordinances are not overly restrictive on minority residential and business development. In addition, during program year 2016, Summerville continued the enforcement of the International Building Code. The International Building Code standardizes buildings and structures on a national basis to ensure standard craftsmanship during the construction of homes. Enforcement of this code continues to help protect the health and safety of community citizens, including those of low-and-moderate income. In program year 2016, the Town also completed the Green Infrastructure Plan that will provide increased access to bike paths, sidewalks, and nature paths, and will promote open space, sustainable development, and water quality for residents. Implementation of these initiatives will provide low-and-moderate-income residents with increased opportunity and access to recreational and wellness areas, economic opportunities, and transportation.

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

During program year 2016, the Town of Summerville completed an Analysis of Impediments to Fair Housing, which provided insight into the needs of underserved populations and recommendation for overcoming potential impediments to fair housing. Through this study and participation in the Mayors' Commission on Homelessness and Affordable Housing, the Town's Staff has become more familiar with the agencies that provide services to underserved populations and is better equipped to provide information and resources to individuals when needs arise.

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

The Town did not undertake any housing activities with CDBG funds during program year 2015 that would require the mitigation of lead-based paint.

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

During program year 2016, the Town did not use CDBG funds to directly assist individual families. The investment in infrastructure including the revitalization of Hutchinson Square and construction of sidewalks on West 2nd North Street, however, have the potential to provide

poverty-level families living in Census Tract 107 with access to economic opportunities, public and social services, and public transportation.

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

Since its initial year as an entitlement grantee, the Town has developed in-house capacity to fully manage its CDBG program. Key CDBG staff including the Director of Economic Development and Administration, Director of Planning, Director of Public Works, Director of Park and Recreation, Grants Writer, and Assistant Director of Finance meet on a regular basis to ensure that grant funded activities stay on track for completion, identify obstacles to success, and discuss potential future projects. Throughout the 2016 program year, the Grants Writer, who is primarily responsible for managing the Town's CDBG program, attended training and participated in webinars related to the administration and management of the CDBG program. Additionally, administrative staff began working on a formalized institutional grant policy and procedures manual for all Town grants, including CDBG.

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

The Town of Summerville is a member of the Mayors' Commission on Homelessness and Affordable Housing, which is a multi-jurisdictional body that was formed to provide strategy and direction for eliminating homelessness in the Charleston Metro region. As a member of the Mayors' Commission, the Town has also become familiar with the various housing and social service agencies that serve Summerville and the greater Charleston Metro Region. Through this enormous coordination effort, the Town has become better equipped to develop its Annual Action Plans in a way that maximize the impact of its CDBG program through coordination with local nonprofit organizations. The Town is also now better able to refer the community to the appropriate social services agencies when needs arise.

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

HUD requires CDBG entitlement jurisdictions to conduct an Analysis of Impediments to Fair Housing as a means to identify barriers that may exist and actions that may be taken to address and mitigate barriers associated with fair and equitable housing. During 2016, the Town utilized the services of Berkeley-Charleston-Dorchester Council of Governments to complete an Analysis of Impediments to Fair Housing Study. The study analyzed the Town's laws, regulations, administrative policies, procedures and practices to assess how each affects the location, availability and accessibility of housing, as well as how external conditions and the housing and economic market effect fair housing choice.

The Analysis of Impediments to Fair Housing revealed several impediments to fair housing in the Summerville community:

- Lack of Local Housing Agencies and Resources
- General Public Awareness of Fair Housing Issues and Laws
- Enforcement of Existing Fair Housing Laws
- Transportation
- Financial
- NIMBY-ism

Based on the recommendations of the Analysis of Impediments, the Town of Summerville amended its Consolidated Plan to include Fair Housing Promotion as a goal, and in doing so, allowed CDBG funds to be allocated toward specific activities targeted to build awareness of fair housing issues and provide counseling for those who may experience housing discrimination. During Program Year 2017, the Town will allocate funding toward Fair Housing Education and Outreach, as well as Fair Housing Counseling. These projects will be carried out by the Charleston Trident Urban League, a local HUD-certified fair housing counseling agency.

In an effort to begin mitigating potential impediments to fair housing through increased awareness, the Town published information regarding Fair Housing Laws and the Affirmatively Further Fair Housing regulation on the new CDBG page of its website. The Town worked closely with the Charleston Trident Urban League throughout program year 2016 to learn more about fair housing issues in the region and will continue this partnership into program year 2017 when the CTUL bring CDBG-funded education, outreach, and counseling to Summerville residents. The Town is also in the process of developing its Unified Development Ordinance to ensure that applicable codes and ordinances relating to zoning and development are consistent and would not restrict minority housing or business development. Consistent and unified ordinances should create additional opportunities for more affordable and workforce housing in the Summerville community for individuals of varying income levels.

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 Town's Grants Writer and the Assistant Finance Director monitor CDBG expenditures and IDIS cash disbursements on a regular basis to ensure that all project expenses are correctly coded to the appropriate account codes in the Town's general ledger and recorded revenues match cash disbursements in HUD's IDIS reporting system. Timely tracking and reviewing project expenditure information also helps the Town discern when additional funding may be available for transfer to other approved projects or alert administrative staff to circumstances where a formal budget amendment through HUD may be necessary.

In order to be compliant with CDBG program timeliness requirements, the Town is required to have no more than 1.5 times its annual allocation amount remaining in its line-of-credit 60 days prior to the end of its program year (June 30th). On the program year 2016 measurement date, the Town had 1.2 times its annual allocation amount in its line-of-credit, and, therefore, met required CDBG program timeliness requirements for approved project expenditures.

For all CDBG-funded projects, the Town provides grant-related conditions, regulations, and bidder-certification forms in bid packages and works with contractors to ensure compliance with Davis-Bacon and Related Acts, Section 3, and minority business outreach. In addition to requiring bidder certification to comply with regulations, the Town reviews weekly certified payrolls and interviewed employees to ensure proper payment and classification of employees.

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.

The Town of Summerville is required to develop and submit a CAPER to HUD on an annual basis in order to meet statutory requirements for receiving funding allocations for its CDBG program. Per HUD requirements, the Town's draft CAPER was made available and accessible to the public for review and comment for a period of at least 15 calendar days. Copies of the draft

CAPER were made available for review Monday-Friday between the hours of 8:30 a.m. and 5:00 p.m. at Summerville Town Hall Annex building in the office of the Grants Writer and on the Town's website, www.summervillesc.gov/CAPER.

The public comment period for the Program Year 2016 CAPER commenced on September 8, 2017 and concluded at 5:00 p.m. on September 22, 2017. Per the Town's Citizen Participation Plan, notice of availability of the draft CAPER was advertised through several sources including the *Post and Courier* newspaper, the Town's website, and postings in Town Hall facilities. All advertisements clearly stated that the Town practices a policy of non-discrimination. Advertisements also stated that the Town encouraged public review and comment on its draft CAPER and would consider, respond to, and incorporate all comments received into its final CAPER prior to its submission to HUD (see Attachment 3, "Proof of Advertisement").

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.

Following the completion of the 2016 Analysis of Impediments to Fair Housing study, the Town submitted a substantial amendment of its 2015-2020 Consolidated Plan to incorporate the goal to “Promote Fair Housing” in order to implement the recommendations of the report. By incorporating this as objective as a formal Consolidated Plan Goal, the Town set measurable goals for affirmatively furthering fair housing and is prepared to allocate financial resources toward eliminating existing and potential impediments to fair housing.

The substantial amendment to the 2015-2020 Consolidated Plan also included the following changes:

- Changed the start and end years for each ConPlan goal to include all five years in order to assist with reporting accomplishments and to allow the Town flexibility to determine what the greatest needs for the community are from year to year.
- Added nonprofit organizations that will help carry out activities to the institutional delivery structure
- Updated the 2015 Annual Action Plan to reflect reallocation of funds
- Updated the Goal Outcome Indicator for Homeless Assistance after consultation with the local homeless shelter

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

No, the Town of Summerville does not have any open BEDI grants.

[BEDI grantees] Describe accomplishments and program outcomes during the last year.

N/a

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