



## **2022 Annual Action Plan**

The City of Mount Vernon, NY  
Department of Planning & Community Development  
City Hall – Room 211  
1 Roosevelt Square Mount Vernon, NY 10550

Annual Action Plan  
2022

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# Executive Summary

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

### 1. Introduction

As a recipient of Federal entitlement grant funds, the City of Mount Vernon (City) is required to submit a Consolidated Plan to the U.S. Department of Housing & Urban Development (HUD) every five years. The Consolidated Plan describes the City's community development priorities and multi-year goals, which are informed by an assessment of housing and community development needs and an analysis of housing and economic market conditions and available resources. Through a combination of statistical analysis and community input, the City determines the needs in the community and outlines a strategy, including priorities and goals, to address these needs.

The Consolidated Plan is implemented through Annual Action Plans which provide a concise summary of the actions, activities and Federal and non-Federal resources that will be used each year to address the priority needs and goals identified in the Consolidated Plan. This plan is the program year (PY) 2022 Annual Action Plan (AAP) and the third year of the Consolidated Plan.

There are two sources of federal program funds in this Annual Action Plan. The purpose of each grant program is outlined below:

- **Community Development Block Grant (CDBG)** funds are used to develop viable urban communities by providing decent housing, a suitable living environment, and opportunities to expand economic opportunities, principally for low- and moderate-income persons.
- **HOME Investment Partnerships (HOME)** funds are used for a wide range of activities, including acquiring, developing and/or rehabilitating affordable housing for rent or homeownership and providing direct rental assistance to low-income families. It is the largest Federal block grant program for State and local government designed exclusively to create affordable housing for low-income households.

### 2. Summarize the objectives and outcomes identified in the Plan

The following list presents the overriding strategies and goals of the City of Mount Vernon's Five-Year Consolidated Plan for Housing and Community Development, including selected performance criteria associated with each strategy and goal. Furthermore, there may be a need to direct such housing resources by use of project selection criteria, which may be updated annually, based upon year-to-year need and local circumstances.

The Strategy the City will pursue over the next five years are as follows:

1. Expand the supply of quality affordable housing;

2. Elimination of slum and blight;
3. Improve public facilities and infrastructure;
4. Support public services that provide much needed programs and services to the City's youth, seniors, low income individuals and families, and special needs populations;
5. Prevent homelessness and provide housing and services to the homeless;
6. Support revitalization of neighborhoods through code enforcement as a way of maintaining existing housing and preventing or eliminating blighted conditions;
7. Expand economic development opportunities; and
8. Implement the grant programs effectively and efficiently while strengthening institutional structure.

### **Investments in Public Infrastructure**

For PY 2022, the City will allocate CDBG funds to address public infrastructure improvements. Specific activities include addressing critical infrastructure improvements, primarily street repaving, improvement of playgrounds, and improvements at the Stevens House and at the Dole Center. The City will also reallocate prior year funds from PY 2016 and 2018 to address public infrastructure.

### **Code Enforcement**

For PY 2022, the City will allocate CDBG funds for bilingual code enforcement officers to address the clearance of unusable structures. The aging housing stock and lack of investment in some areas has resulted in structures that are unsafe and unusable and the hiring of the two code enforcement officers will address these concerns.

### **HOME TBRA**

The City will fund tenant-based rental assistance in PY 2022. This assistance will be targeted towards low- to moderate-income households in need of this services in Mount Vernon.

## **3. Evaluation of past performance**

The City of Mount Vernon, with other public, private and non-profit community housing providers and non-housing service agencies have made noteworthy contributions to provide safe, decent and affordable housing, a suitable living environment and economic opportunities especially for low- to moderate-income households in the community.

However, affordable housing, public facilities and infrastructure improvements, vital public services for LMI and homeless individuals and households are some of the most prolific needs in the City, as documented by the current Consolidated Plan, and the most recently completed 2019 Consolidated Annual Performance and Evaluation Report (CAPER). The CAPER provides an assessment of progress

towards the five-year goals and the one-year goals of HUD entitlement grants. The following is a report of PY 2019 accomplishments.

In PY 2019, to help increase affordable housing in Mount Vernon, the City was able to assist 158 LMI households with rental construction at the La Porte development. Eleven (11) were funded with HOME and 147 were funded with CDBG. This activity was originally started in 2012 and was reported as completed in PY2019. The City also reporting 8 LMI homeowner households assisted with residential housing rehab. This activity (#2115) was started in 2010 and was reported as completed in PY2019.

A total of 101 persons received assistance through economic development activities, which included 47 LMI youth assisted with afterschool programs that provided career counseling, job training, employment skills development, internship opportunities, and resume and job assistance as well as 54 LMI persons receiving employment training.

Through public facility and infrastructure activities targeting residents citywide, an estimated 65,265 persons benefitted from street improvements, improvements to city parks, and fire safety equipment. There were 12,958 LMI persons receiving vital public services such as legal services, youth services, crime prevention, fair housing outreach, and food distribution programs.

#### Overcoming Legacy Challenges

The City will build upon past experience and new strategies to meet the goals set in the Annual Action Plan. The Department of Planning and Community Development/Mount Vernon Urban Renewal Agency will focus on using data-driven approaches and utilize resident and stakeholder engagement to validate the needs and priorities set in the Consolidated Plan. The City continues to make great strides in addressing the community's needs and the Consolidated Plan priorities through community involvement, evaluating past performance, and responding to past experience with improved efficiency.

#### **4. Summary of Citizen Participation Process and consultation process**

This AAP represents community input from a broad set of stakeholders that included city agencies, county agencies, advocacy groups, social service providers homeless providers, and economic development organizations and residents regarding existing conditions and strategies for addressing current needs. The City recognizes that Mount Vernon residents are the center of, and partners in, the development and execution of these plans.

The City held a public review and comment period to review the goals and activities in the Annual Action Plan. The first 30-day public comment period was held from June 7, 2022 through July 8, 2022 and a second 30-day public comment period was held from July 1, 2022 through August 1, 2022. The City also held a series of public hearings to discuss the housing and community development needs in Mount Vernon as well as the activities identified in this plan to address those needs.

Note: The first 30-day public comment period from June 7, 2022 through July 8, 2022 was not noticed on time, and a second 30-day public comment period was opened from July 1, 2022 to August 1, 2022. The second public comment period was noticed on time and the proof of publishing attachments have been uploaded to the AD-26.

A summary of details for the citizen participation process can be viewed in the AP-12 Participation section.

## **5. Summary of public comments**

All comments were accepted. Public comments received as part of the citizen participation process will be included in the appendices of this final PY 2022 Annual Action Plan. The Appendices include the comments received from the public hearing, and the public comment periods on the draft Annual Action Plan.

A summary of comments from the public can be viewed in the AP-12 Participation section. Written comments and replies were attached to the citizen participation appendix in the AP-26.

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

All comments received to date have been accepted and considered in the development of the AAP. A final summary of public comments will be included in the appendix of this 2022 Annual Action Plan.

## **7. Summary**

The PY 2022 Annual Action Plan is the third year of the 5-Year Consolidated Plan. The AAP identifies funding for projects that address Mount Vernon's most critical needs.

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

### 1. Agency/entity responsible for preparing/administering the Consolidated Plan

Describe the agency/entity responsible for preparing the Consolidated Plan and those responsible for administration of each grant program and funding source.

Agency Role	Name	Department/Agency
CDBG Administrator	MOUNT VERNON	Dept of Planning & Community Dev./Urban Renewal
HOPWA Administrator	MOUNT VERNON	Department of Planning and Community Development
HOME Administrator	MOUNT VERNON	Dept of Planning & Community Dev./Urban Renewal
ESG Administrator	MOUNT VERNON	Dept of Planning & Community Dev./Urban Renewal

**Table 1 – Responsible Agencies**

### Narrative

The City of Mount Vernon’s Department of Planning & Community Development (City), in conjunction with the Urban Renewal Agency (Agency), is responsible for the administration and implementation of projects funded with Community Development Block Grant (CDBG), HOME Investment Partnerships Program (HOME), and Emergency Solutions Grant (ESG) funding from the U.S. Department of Housing and Urban Development (HUD). In PY 2022, the City is not a direct recipient of ESG funds.

The City is also responsible for providing guidance and policy direction for implementing eligible programs that support the City’s overall strategy for community revitalization. The City through the Planning Department and Mount Vernon Urban Renewal Agency established priorities, goals and selected projects that were in alignment with the Consolidated Plan and AAP to meet the needs of the community.

Within City government, the Planning Department is able to draw on the expertise of other departments to deliver programs and see delivery of identified outcomes. The Department of Public Works assists with public infrastructure and park improvements. The Department of Recreation assists with improving playgrounds and providing scholarships to low-and moderate-income families to increase recreational opportunities. The Youth Bureaus assists with providing summer camp, after-school programs and employment and training to low income youth. Further the City works with a variety of community-based organizations to assist with the delivery of programs and services.

### Consolidated Plan Public Contact Information

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## **AP-10 Consultation – 91.100, 91.200(b), 91.215(l)**

### **1. Introduction**

The City of Mount Vernon’s Department of Planning & Community Development/Mount Vernon Urban Renewal Agency has made extensive efforts to consult with other public and private entities that provide assisted housing, health services, and social services in the development of this Plan. The City held a public comment period to review the goals and activities in the Annual Action Plan. As well, the City held a public hearing to discuss the housing and community development needs in Mount Vernon as well as the activities identified in this plan to address those needs.

### **Provide a concise summary of the jurisdiction’s activities to enhance coordination between public and assisted housing providers and private and governmental health, mental health and service agencies (91.215(l))**

The Department of Planning and Community Development/Mount Vernon Urban Renewal Agency will:

- Continue to reach out to and consult with organizations listed in the table titled “Agencies, Groups, Organizations Who Participated” in this section of the Plan.
- Seek new opportunities for collaboration and consultation to find innovative approaches to addressing pressing community needs and fair housing impediments including COVID-19 impacts;
- Lead and advance strategies to end chronic homelessness in Mount Vernon;
- Host meetings with housing advocates, homeless providers, and government agencies to increase collaboration between the public and non-profit sectors.
- Meet with community groups and agencies throughout the year to solicit input regarding MVURA programs and to plan future activities.

### **Describe coordination with the Continuum of Care and efforts to address the needs of homeless persons (particularly chronically homeless individuals and families, families with children, veterans, and unaccompanied youth) and persons at risk of homelessness.**

Homeless services in the Westchester CoC are delivered by a network of local and Federal government, nonprofit agencies, mental-health service organizations, affordable housing developers, public housing authorities, youth homeless providers, school administrators, victim service providers, and veterans service organizations. The City of Mount Vernon holds a voting seat on the Westchester CoC Steering Committee. The City participates in monthly CoC Board meetings. Members of the MVURA staff meet with officials of the Westchester County CoC consortia on a monthly basis to discuss mutual needs, resources and services that maximize and coordinate programs and services to the homeless.

**Describe consultation with the Continuum(s) of Care that serves the jurisdiction's area in determining how to allocate ESG funds, develop performance standards for and evaluate outcomes of projects and activities assisted by ESG funds, and develop funding, policies and procedures for the operation and administration of HMIS**

The City of Mount Vernon is a member of the Westchester Continuum of Care (CoC) governing board. In addition to Mount Vernon, representatives from New Rochelle, Yonkers, and White Plains serve on the Board of the Westchester CoC and collaborate to develop local priorities for homeless services.

The Westchester CoC Board formally adopts and distributes to all local ESG recipients a list of ESG Funding Priorities each year. ESG priorities for the Westchester CoC included funding Homelessness Prevention and Street Outreach activities, as well as targeting Rapid Re-housing to serve homeless residing in Transitional Housing. These recommendations have been followed by Yonkers ESG and Westchester County ESG and resulted in additional ESG funding for the priority activities.

Westchester County, as lead agency for the Continuum of Care, administers the HMIS to track multiple shelter entries over time that accurately identify people who potentially meet HUD's definition of chronically homeless. The Westchester County CoC is responsible for managing HMIS software licenses, training all users, developing, implementing and enforcing security policies and data quality standards, and providing data reports. All CoC funded agencies are users of the Homeless Management Information System (HMIS) system, which is a database used to aggregate homeless population data and provide information on the characteristics and services needed for the homeless in the CoC area.

**2. Describe Agencies, groups, organizations and others who participated in the process and describe the jurisdiction's consultations with housing, social service agencies and other entities**

**Table 2 – Agencies, groups, organizations who participated**

1	<b>Agency/Group/Organization</b>	Community Housing Innovations, Inc
	<b>Agency/Group/Organization Type</b>	Housing Services - Housing Regional organization Neighborhood Organization
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Market Analysis
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	This organization attended a focus group during the Consolidated Plan process which helped to determine the community and housing development needs, and remains engaged with the City.
2	<b>Agency/Group/Organization</b>	UJAMAA COMMUNITY DEVELOPMENT CORPORATION
	<b>Agency/Group/Organization Type</b>	Housing
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	This organization attended a focus group during the Consolidated Plan process which helped to determine the community and housing development needs, and remains engaged with the City.
3	<b>Agency/Group/Organization</b>	Grace Church Community Center, Inc.
	<b>Agency/Group/Organization Type</b>	Housing Services - Housing Services-Children Services-Elderly Persons Services-Persons with HIV/AIDS Services-homeless Regional organization
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Homeless Needs - Chronically homeless Homelessness Needs - Unaccompanied youth Homelessness Strategy Market Analysis

	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	This organization attended a focus group during the Consolidated Plan process which helped to determine the community and housing development needs, and remains engaged with the City.
4	<b>Agency/Group/Organization</b>	ST JOHN PAUL CLEMENT CHURCH
	<b>Agency/Group/Organization Type</b>	Housing Services - Housing Services-Children Services-Elderly Persons Services-Persons with HIV/AIDS Services-homeless Regional organization
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Unaccompanied youth Homelessness Strategy Market Analysis
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	This organization attended a focus group during the Consolidated Plan process which helped to determine the community and housing development needs, and remains engaged with the City.
5	<b>Agency/Group/Organization</b>	MOUNT VERNON HUMAN RIGHTS COMMISSION
	<b>Agency/Group/Organization Type</b>	Housing Service-Fair Housing Services - Mental Health
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Public Housing Needs
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	This organization attended a focus group during the Consolidated Plan process which helped to determine the community and housing development needs, and remains engaged with the City.

6	<b>Agency/Group/Organization</b>	MY SISTERS PLACE
	<b>Agency/Group/Organization Type</b>	Services-Victims of Domestic Violence Services-homeless Services-Health
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Non-Homeless Special Needs
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	This organization attended focus groups and had a stakeholder interview during the Consolidated Plan process which helped to determine the community and housing development needs, and remains engaged with the City.
7	<b>Agency/Group/Organization</b>	MOUNT VERNON UNITED TENANTS INC
	<b>Agency/Group/Organization Type</b>	Services - Housing Services-homeless Service-Fair Housing
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Public Housing Needs Homelessness Strategy Market Analysis
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	This organization attended focus groups and had a stakeholder interview during the Consolidated Plan process which helped to determine the community and housing development needs, and remains engaged with the City.
8	<b>Agency/Group/Organization</b>	The Guidance Center of Westchester
	<b>Agency/Group/Organization Type</b>	Services - Housing Services-Children Services-Elderly Persons Services-Health Services-Education Publicly Funded Institution/System of Care Regional organization

	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Non-Homeless Special Needs
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	This organization participated in a stakeholder interview during the Consolidated Plan process which helped to determine the community and housing development needs, and remains engaged with the City.
9	<b>Agency/Group/Organization</b>	WESTCHESTER DISABLED ON THE MOVE
	<b>Agency/Group/Organization Type</b>	Services-Persons with Disabilities
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Public Housing Needs Non-Homeless Special Needs Market Analysis
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	This organization attended focus groups and had a stakeholder interview during the Consolidated Plan process which helped to determine the community and housing development needs, and remains engaged with the City.
10	<b>Agency/Group/Organization</b>	WESTCHESTER RESIDENTIAL OPPORTUNITIES,IN N
	<b>Agency/Group/Organization Type</b>	Housing Services - Housing Service-Fair Housing
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Non-Homeless Special Needs Market Analysis
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	This organization attended focus groups and had a stakeholder interview during the Consolidated Plan process which helped to determine the community and housing development needs, and remains engaged with the City.
11	<b>Agency/Group/Organization</b>	FEEDING WESTCHESTER
	<b>Agency/Group/Organization Type</b>	Services-homeless Regional organization Neighborhood Organization

	<b>What section of the Plan was addressed by Consultation?</b>	Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	This organization attended focus groups and had a stakeholder interview during the Consolidated Plan process which helped to determine the community and housing development needs, and remains engaged with the City.
12	<b>Agency/Group/Organization</b>	LEGAL SERVICES OF HUDSON VALLEY
	<b>Agency/Group/Organization Type</b>	Services - Housing Services-homeless Regional organization
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy Non-Homeless Special Needs
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	This organization attended focus groups and had a stakeholder interview during the Consolidated Plan process which helped to determine the community and housing development needs, and remains engaged with the City.
13	<b>Agency/Group/Organization</b>	UPON THIS ROCK MINISTRIES CHURCH
	<b>Agency/Group/Organization Type</b>	Services-homeless Services - non-homeless Neighborhood Organization
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy Non-Homeless Special Needs

	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	This organization attended focus groups and had a stakeholder interview during the Consolidated Plan process which helped to determine the community and housing development needs, and remains engaged with the City.
14	<b>Agency/Group/Organization</b>	MENTAL HEALTH OF WESTCHESTER
	<b>Agency/Group/Organization Type</b>	Services-homeless Health Agency Publicly Funded Institution/System of Care Services - Mental Health Neighborhood Organization
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy Non-Homeless Special Needs
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	This organization attended focus groups and had a stakeholder interview during the Consolidated Plan process which helped to determine the community and housing development needs, and remains engaged with the City.
15	<b>Agency/Group/Organization</b>	WESTCHESTER COC
	<b>Agency/Group/Organization Type</b>	Services-homeless Regional organization Services - Mental Health
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	This organization attended focus groups and had a stakeholder interview during the Consolidated Plan process which helped to determine the community and housing development needs, and remains engaged with the City.



16	<b>Agency/Group/Organization</b>	WOMENS ENTERPRISE DEVELOPMENT CENTER
	<b>Agency/Group/Organization Type</b>	Services-Employment Economic Development
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Non-Homeless Special Needs Market Analysis Economic Development
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	This organization attended a focus group during the Consolidated Plan process which helped to determine the community and housing development needs, and remains engaged with the City.
17	<b>Agency/Group/Organization</b>	FAMILY SERVICES OF WESTCHESTER
	<b>Agency/Group/Organization Type</b>	Housing Services - Housing Services-Children Services-Elderly Persons Services-Persons with HIV/AIDS Services-homeless Regional organization
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Public Housing Needs Non-Homeless Special Needs Market Analysis Homeless Special Needs
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	This organization attended a focus group during the Consolidated Plan process which helped to determine the community and housing development needs, and remains engaged with the City.
18	<b>Agency/Group/Organization</b>	BRIDGE FUND OF NEW YORK, INC.
	<b>Agency/Group/Organization Type</b>	Services-homeless Regional organization Services - Mental Health

	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	This organization attended a focus group during the Consolidated Plan process which helped to determine the community and housing development needs, and remains engaged with the City.
19	<b>Agency/Group/Organization</b>	ALLIED COMMUNITY ENTERPRISES
	<b>Agency/Group/Organization Type</b>	Housing
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Market Analysis
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	This organization attended a focus group during the Consolidated Plan process which helped to determine the community and housing development needs, and remains engaged with the City.
20	<b>Agency/Group/Organization</b>	MOUNT VERNON DEPARTMENT OF RECREATION
	<b>Agency/Group/Organization Type</b>	Services-Children Other government - Local
	<b>What section of the Plan was addressed by Consultation?</b>	Non-Homeless Special Needs Community Revitalization, Quality of Life Improvements
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	This organization attended a focus group during the Consolidated Plan process which helped to determine the community and housing development needs, and remains engaged with the City.
21	<b>Agency/Group/Organization</b>	MOUNT VERNON CITIZEN ADVISORY COMMITTEE FOR THE DISABLED
	<b>Agency/Group/Organization Type</b>	Services-Persons with Disabilities

	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Public Housing Needs Non-Homeless Special Needs Market Analysis
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	This organization attended a focus group during the Consolidated Plan process which helped to determine the community and housing development needs, and remains engaged with the City.
22	<b>Agency/Group/Organization</b>	MOUNT VERNON YOUTH BUREAU
	<b>Agency/Group/Organization Type</b>	Services-Children Services-Education
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Non-Homeless Special Needs
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	This organization attended focus groups during the Consolidated Plan process which helped to determine the community and housing development needs, and remains engaged with the City.
23	<b>Agency/Group/Organization</b>	MOUNT VERNON DEPARTMENT OF PLANNING
	<b>Agency/Group/Organization Type</b>	Housing Agency - Managing Flood Prone Areas Agency - Management of Public Land or Water Resources Agency - Emergency Management Other government - Local Economic Development
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Market Analysis Economic Development
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	This organization participated in a stakeholder interview during the Consolidated Plan process which helped to determine the community and housing development needs, and remains engaged with the City.

24	<b>Agency/Group/Organization</b>	BROADBANDNOW
	<b>Agency/Group/Organization Type</b>	Services - Broadband Internet Service Providers Services - Narrowing the Digital Divide
	<b>What section of the Plan was addressed by Consultation?</b>	Market Analysis Community Development
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	BroadbandNow collects and maintains internet coverage for all US internet providers. BroadbandNow is also focused on bringing awareness to the digital divide and bringing awareness to the issue. Its belief is that broadband internet should be available to all Americans. Information and data from the BroadbandNow website helped to inform the market analysis. Currently, there are four providers with internet speeds of at least 25Mbps (1 cable, 1 fiber and 2 satellite). Low income residents have access to discounted services through Spectrum Internet Assist.

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

All comments were welcome. There were no agencies that were intentionally not consulted.

**Other local/regional/state/federal planning efforts considered when preparing the Plan**

<b>Name of Plan</b>	<b>Lead Organization</b>	<b>How do the goals of your Strategic Plan overlap with the goals of each plan?</b>
Continuum of Care	Westchester County	The Consolidated Plan is consistent with the goals and strategic plan of the Continuum of Care and the plan to end homelessness.
Analysis of Impediments to Fair Housing Choice	City of Mount Vernon	The AI identified housing impediments that can be addressed using the activities and priorities identified in the Consolidated Plan.

**Table 3 – Other local / regional / federal planning efforts**

**Narrative**

The City will continue to collaborate with numerous governmental entities in Westchester County and throughout the region to implement the goals and objectives of the City’s community development and housing programs.

## **AP-12 Participation – 91.105, 91.200(c)**

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

The City of Mount Vernon follows its Citizen Participation Plan for all community outreach. The purpose of the citizen participation process is to actively encourage citizens, particularly low- and moderate-income households, to participate in the planning of the Consolidated Plan, the Annual Action Plan (AAP), the development of the Consolidated Annual Performance Evaluation Report (CAPER) and any required submission of substantial amendments to those plans. The City works to ensure community stakeholders and city citizens have adequate opportunities to participate in this planning process.

The City's efforts to allow for participation for the PY 2022 AAP include a public comment period to give city citizens an opportunity to review the goals and activities outlined in this Annual Action Plan and provide feedback. In addition, a series of public hearings were held to allow for comments on the draft AAP.

A summary of the citizen outreach efforts is described in the table below:

### Citizen Participation Outreach

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL
1	Public Comment Period	Non-targeted/broad community	<p>A 30-day public comment period was held from June 7, 2022 through July 8, 2022. The plan could be viewed at the following locations:                      Department of Planning and Community Development, at City Hall, Second Floor, 1 Roosevelt Square, Mount Vernon, NY 10550; at the City Clerk's Office, at City Hall, First Floor, 1 Roosevelt Square, Mount Vernon, NY 10550; or on the city website:  <a href="https://cmvny.com/224/Urban-Renewal-Agency-URA">https://cmvny.com/224/Urban-Renewal-Agency-URA</a>. Written comments could be made to the contact in the PR-05. This 30-day public comment period was not noticed on time, and a second 30-day public comment period was opened from July 1, 2022 to August 1, 2022.</p>	<p>There was one written comment in support of funding for Family Service Society of Yonkers. The need for accessible affordable apartments is a major unmet need in the City of Mt. Vernon.</p>	<p>All comments were accepted.</p>	<p><a href="https://cmvny.com/224/Urban-Renewal-Agency-URA">https://cmvny.com/224/Urban-Renewal-Agency-URA</a></p>

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL
2	Public Hearing	Non-targeted/broad community	A virtual public meeting will be held on June 17, 2022 at 10:00AM for all interested persons to provide comments on the draft plan.	No comments were submitted from the public.	All comments were accepted.	NA
3	Public Hearing	Non-targeted/broad community	A virtual public meeting was held on June 21, 2022 at 6:00PM for all interested persons to provide comments on the draft plan.	Resident of Adams St (young family)- Playground that is in dire need of rehabilitation and noise level of gatherings at the park, gang affiliations of gatherings at the park-Unsafe equipment on the playground-Advocating for prioritizing renovation of the playground-Speed bumps or another way to slow down traffic on the street-Traffic light and/or crosswalks outside of the parking lots outside of Mount Vernon E Train Station-Need for safe place for her child to play - foster child with PTSD diagnosis	All comments were accepted.	<a href="https://www.youtube.com/watch?v=tomkfh3KI_w">https://www.youtube.com/watch?v=tomkfh3KI_w</a>

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL
4	Public Hearing	Non-targeted/broad community	A public hearing was held on June 30, 2022 at 6:30PM for all interested persons to provide comments on the draft plan.	<p>Resident:</p> <ul style="list-style-type: none"> <li>-Kinship caregiving: grandparents who are solely responsible for raising grandchildren; not eligible for benefits, remaining in crowded and bad conditions because that is all they can afford</li> <li>-Calling for obtaining benefits, and need for affordable housing</li> <li>-FSSY is assisting kinship families in Yonkers to assist them in finding affordable housing - priority placement of kinship families for municipal housing and Section 8 vouchers</li> <li>-Adding kinship families to the list for qualifying for municipal housing and Section 8 vouchers</li> </ul> <p>Commissioner of Recreation for City of Mount Vernon</p> <ul style="list-style-type: none"> <li>-Funds used for playgrounds, new playgrounds and also rehabilitation of existing playgrounds.</li> <li>-Also rehab of Doles Center Community center: New furniture for seniors, Rehab the theater to invest in the arts, promote pride in the community</li> <li>-New playground is an ADA compliant playground (water apparatus, fitness equipment, pavilion, access for persons with special needs)</li> </ul> <p>Commissioner of Dept of Public Works</p> <ul style="list-style-type: none"> <li>-Funding going toward street paving-Looking to pave 100+ streets (Previously repairing potholes but need more work)</li> </ul>	All comments were accepted.	<a href="https://www.youtube.com/watch?v=8dQ6MdE5TnA">https://www.youtube.com/watch?v=8dQ6MdE5TnA</a>



Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL
				<p>Add ADA compliant handrails to streets in addition to paving</p> <p>PD of Oasis Annex Women’s Drop-In Shelter  -50 women they serve who deal with mental illness &amp; homelessness  -Need for funding for programs, clothing, food, beds, medical supplies, medication, hiring additional staff to expand programs  Resident  -Advocating for Adams Street playground renovation  -Dept of Recreation has supported the call but not much has been done  -Also, some sort of mitigation of speeding on Adams St  -Crosswalks at the entrance to the Mount Vernon Train station</p> <p>Bailey Initiative  -Non-profit for creating generational wealth for people of color through homeownership, working on becoming a CHDO  -Developing programs on educational side and also developing blighted properties for homeownership, bringing back value to neighborhoods</p>		

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL
				<p>Family Services Society of Yonkers</p> <ul style="list-style-type: none"> <li>-Access to Homes Programs, accessibility issues for people with disabilities; ADA additions for homeowners</li> <li>-Other program for Yonkers residents only HOME Program</li> <li>-Programs to enable seniors and people with disabilities to make ADA accessibility improvements to their homes</li> <li>-Works with contractors</li> </ul> <p>Response to comments, Deputy Commissioner Sylvia Bolivar and Commissioner</p> <ul style="list-style-type: none"> <li>-Support of all comments</li> <li>-Looking for other funding sources for these types of projects</li> <li>-Potential for application for a Kaboom Playground</li> <li>-Applications for Mayors for Guaranteed Income - \$500/month for 1 year in financial support to be used as needed.</li> </ul>		

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL
5	Public Comment Period	Non-targeted/broad community	A new 30-day public comment period was held from July 1, 2022 through August 1, 2022. The plan could be viewed at the following locations: Department of Planning and Community Development, at City Hall, Second Floor, 1 Roosevelt Square, Mount Vernon, NY 10550; at the City Clerk's Office, at City Hall, First Floor, 1 Roosevelt Square, Mount Vernon, NY 10550; or on the city website. Written comments on the plan may be submitted via email at: Sbolivar@cmvny.com	There were no comments.	All comments were accepted.	<a href="https://cmvny.com/250/Community-Development-Block-Grant-Program">https://cmvny.com/250/Community-Development-Block-Grant-Program</a>

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL
6	Public Hearing	Non-targeted/broad community	A public hearing was held on July 26, 2022 at 6:30PM for all interested persons to provide comments on the draft plan. The public hearing was held at City Council Chambers, 1 Roosevelt Square, Mount Vernon, NY 10550. This comment period was noticed on time and the proof of publishing has been uploaded to the AD-26.	There were no comments.	All comments were accepted.	NA

**Table 4 – Citizen Participation Outreach**

## Expected Resources

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

#### Introduction

Currently, the City of Mount Vernon receives CDBG funds for infrastructure and public facilities, housing, public services, and economic development. HOME funds received are for eligible housing development and subsidies. In PY 2022, the City is receiving entitlement funding in the following amounts: \$1,594,770 in CDBG funds and \$599,764 in HOME funds. In PY 2022, The City is not a recipient of ESG funds. ESG funds address homelessness in the City. It is anticipated that HUD entitlement funding levels will be similar over the remainder of the Consolidated Plan.

Additionally, the City will reallocate a total of \$90,605 of prior year CDBG funds from PY 2016 & PY 2018 towards public facilities and infrastructure. The following is a breakdown of reallocated funds to be utilized for public facilities & infrastructure projects:

PY 2016: \$40,605

PY 2018: \$50,000

Total to be reallocated: \$90,605

## Anticipated Resources

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
CDBG	public - federal	Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services	1,594,770	0	90,605	1,685,375	3,189,540	The expected amount available for the remainder of the ConPlan is 2x more years of the annual allocation. The City will reallocate \$90,605 in prior year funds.
HOME	public - federal	Acquisition Homebuyer assistance Homeowner rehab Multifamily rental new construction Multifamily rental rehab New construction for ownership TBRA	599,764	0	0	599,764	1,199,528	The expected amount available for the remainder of the ConPlan is 2x more years of the annual allocation.

Table 5 - Expected Resources – Priority Table

**Explain how federal funds will leverage those additional resources (private, state and local funds), including a description of how matching requirements will be satisfied**

The City of Mount Vernon will substantially leverage HUD funds in conjunction with investments made in designated Opportunity Zones in the City. The federal Tax Cuts and Jobs Act of 2017 created the Opportunity Zone program, which is a tool designed to spur economic development and job creation in distressed communities by providing tax benefits to investors. Localities qualify as Opportunity Zones if they have been nominated for that designation by the state and that nomination has been certified by the Secretary of the US Treasury. Census tract 36119003100 in Mount Vernon has been designated an Opportunity Zone. The City recognizes the importance and promise of having these designations and is prepared to invest in this area to support revitalization by targeting funds for infrastructure and public facilities development. This area is particularly in need of water and sewer upgrades. The City has also leveraged federal funds to receive \$1.6 million from the New York State Department of Environmental Conservation to address sewer repairs.

In addition, New York State programs will be applied to support the following programs: Affordable Home Ownership Development Program, Housing Trust Fund, Housing Development Fund, Low Income Housing Tax Credit Program, Homeless Housing and Assistance Program (HHAP), Homeless Re-Housing Assistance Program (HRAP), Homeless Prevention Program (HPP), SONYMA, and others.

Local resources leveraged by federal funding may include property tax abatement by the Mount Vernon Industrial Development Agency. The City will also seek opportunities for private funding. The City will develop affordable housing on vacant parcels currently owned by the City. HOME funds will be leveraged for the development of affordable housing opportunities.

Further, the City of Mount Vernon combines HUD homeless funding with services provided by many community agencies that include: Montefiore Mount Vernon hospital, Family Service Society of Yonkers, The Guidance Center of Westchester, Lexington Center for Recovery, Mount Vernon Neighborhood Health Center, St. Johns Riverside Hospital, and Westchester County Department of Social Services. In addition, the City received \$1,049,822 in PY 2019 Continuum of Care grant funds to continue to assist homeless residents by providing housing subsidies and supportive services to enable participants to live independently.

Please refer to the map Qualified Opportunity Zone Designation in the SP-10 of the City's 2020-2024 Consolidated Plan.

### **HOME Match**

The City receives a HOME Match well in excess of the 25% match requirement for the HOME program. In each of the past two years the City reported at least \$630,000 as match from the Blue Rio Pilot project, which entered into a payment in lieu of taxes (PILOT) program with the City of Mount Vernon. The City anticipates a similar amount in PY 2022 which it will use as the match. Total excess match carried over to next year will be \$4,303,483.

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

The City is in the early stages of exploring the leveraging of public and private funds for the development of affordable housing on vacant parcels currently owned by the City. Land conveyed by the City will be restricted by a covenant running with the land to ensure enforcement of affordability restrictions. These actions would further the goals of providing affordable housing opportunities and eliminating blight.

### **Discussion**

The City of Mount Vernon is addressing existing abandoned property and at-risk homeowner conditions to develop a best practices housing policy that will preempt the occurrence of problematic vacant properties and the subsequent loss of housing and/or neighborhood blight that ensues. Funding from the New York State Attorney General's Office supporting the New York State Abandoned Property Neighborhood Relief Act combats zombie homes and helps families avoid mortgage or tax foreclosure and effectively leverages community development funding.

Through its participation with the New York State Zombie, Vacant, and Abandoned Properties Initiative and grant program, the City of Mount Vernon was eligible to receive an additional grant award for the second phase of Cities RISE: an initiative focused on organizational capacity building with the goal of improved strategic code enforcement practices. Cities RISE II included education for local officials, development of outreach materials, and a significant public engagement process focused on code enforcement and housing problems.



## Annual Goals and Objectives

### AP-20 Annual Goals and Objectives

#### Goals Summary Information

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	1A. Improve Public Infrastructure & Facilities	2020	2024	Non-Housing Community Development	Jurisdiction Wide Opportunity Zones	Expand Improve Public Infrastructure & Facilities	CDBG: \$1,585,375	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 66265 Persons Assisted
4	2C. Increase Affordable Rental Hsing Opportunities	2020	2024	Affordable Housing	Jurisdiction Wide	Neighborhood Revitalization	HOME: \$599,764	Rental units rehabilitated: 2 Household Housing Unit Tenant-based rental assistance / Rapid Rehousing: 40 Households Assisted
5	2D. Clearance & Code Enforcement	2022	2024	Affordable Housing	Jurisdiction Wide	Neighborhood Revitalization	CDBG: \$100,000	Housing Code Enforcement/Foreclosed Property Care: 100 Household Housing Unit

**Table 6 – Goals Summary**

## Goal Descriptions

1	<b>Goal Name</b>	1A. Improve Public Infrastructure & Facilities
	<b>Goal Description</b>	The City will improve public facilities and infrastructure such as sewers, parks, playgrounds, new sidewalks, street repaving, traffic lights, curb cuts, visibility signs, installation of flashing caution signs, speed bumps, reduced speed signage, broadband improvements, shot-spotters, technology for emergency response, repairs at multiple fire stations, fire protection equipment including fire trucks and fire EMT, and ADA improvements. These needs are particularly great in the Opportunity Zones. Construction and rehabilitation of public facilities to include but not limited to senior centers and community centers.
4	<b>Goal Name</b>	2C. Increase Affordable Rental Housing Opportunities
	<b>Goal Description</b>	There remain opportunities to develop and redevelop sites with desirable rental housing that is safe and accessible for Mount Vernon residents, thereby assisting to resuscitate communities in the City and provide options in areas of the city that offer more opportunities for low to moderate income residents. New construction or rehab of existing units can also help increase availability of units for people with disabilities. Additionally, tenant based rental assistance can expand the number of residents able to access affordable housing in existing units.
5	<b>Goal Name</b>	2D. Clearance & Code Enforcement
	<b>Goal Description</b>	The City's aging housing stock and lack of investment in some areas has resulted in structures that are unsafe and unusable. Further, the City lacks the code enforcement resources to address these concerns. Through this goal, the City will enhance code enforcement efforts and begin addressing the clearance of unusable structures.

# Projects

## AP-35 Projects – 91.220(d)

### Introduction

In accordance with the federal regulations 24 CFR, Part 91, the City of Mount Vernon, New York has prepared the PY 2022 Annual Action Plan for submission for its Community Development Programs. This document is a requirement for direct financial assistance under the US Department of Housing and Urban Development (HUD) funding programs including the Community Development Block Grant (CDBG) and HOME Investment Partnerships Program (HOME). The projects below are proposed for PY 2022.

Additionally, the City will reallocate \$90,605 of prior year CDBG funds to Public Facilities and Infrastructure projects.

### Projects

#	Project Name
1	CDBG: Administration
2	CDBG: Code Enforcement
3	CDBG: Public Facilities & Infrastructure
4	HOME: Administration
5	HOME: CHDO Set-Aside 15%
6	HOME: TBRA

Table 7 - Project Information

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

The priorities set forth in the Annual Action Plan are based on, and consistent with, the strategic goals set out in the 5-year plan. The priorities were further informed by extensive community outreach and also took into consideration capacity of the City as well as its subgrantees.

## AP-38 Project Summary

### Project Summary Information

1	<b>Project Name</b>	CDBG: Administration
	<b>Target Area</b>	Jurisdiction Wide
	<b>Goals Supported</b>	1A. Improve Public Infrastructure & Facilities 2C. Increase Affordable Rental Hsing Opportunities 2D. Clearance & Code Enforcement
	<b>Needs Addressed</b>	Expand Improve Public Infrastructure & Facilities Neighborhood Revitalization Homeless Housing & Supportive Services
	<b>Funding</b>	CDBG: \$318,954
	<b>Description</b>	CDBG Administration in PY 2022.
	<b>Target Date</b>	8/31/2023
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	N/A
	<b>Location Description</b>	Citywide
	<b>Planned Activities</b>	Planning and Administration activities associated with, and in support of the CDBG Program. The allocation for planning and administration will be used to ensure compliance with CDBG requirements. (21A)
2	<b>Project Name</b>	CDBG: Code Enforcement
	<b>Target Area</b>	Jurisdiction Wide
	<b>Goals Supported</b>	2D. Clearance & Code Enforcement
	<b>Needs Addressed</b>	Neighborhood Revitalization
	<b>Funding</b>	CDBG: \$100,000
	<b>Description</b>	The City will enhance code enforcement efforts and begin addressing the clearance of unusable structures. The aging housing stock and lack of investment in some areas has resulted in structures that are unsafe and unusable and these activities will address these concerns.
	<b>Target Date</b>	8/31/2023

	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	Housing Code Enforcement/Foreclosed Property Care: 100 Household Housing Unit
	<b>Location Description</b>	Citywide
	<b>Planned Activities</b>	Housing Code Enforcement (15): \$100,000
<b>3</b>	<b>Project Name</b>	CDBG: Public Facilities & Infrastructure
	<b>Target Area</b>	Jurisdiction Wide
	<b>Goals Supported</b>	1A. Improve Public Infrastructure & Facilities
	<b>Needs Addressed</b>	Expand Improve Public Infrastructure & Facilities
	<b>Funding</b>	CDBG: \$1,266,421
	<b>Description</b>	The City will improve public facilities and infrastructure such as streets and sidewalks, access to neighborhood facilities, parks and playgrounds, traffic lights and signage, broadband improvements and ADA improvements in low/mod areas. These needs are particularly great in the Opportunity Zones.
	<b>Target Date</b>	8/31/2023
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	These activities are intended to serve thousands of people, primarily those living in low-and-moderate income areas or those with disabilities or other special needs.  Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 66,265 Persons Assisted (Area-wide benefit)
	<b>Location Description</b>	Citywide
	<b>Planned Activities</b>	Improvements to public facilities and infrastructure serving populations primarily consisting of low-and moderate-income individuals or populations with special needs (03E, 03F, 03K, 03L).  Stevens House, improvements.  Dole Center, improvements.
<b>4</b>	<b>Project Name</b>	HOME: Administration
	<b>Target Area</b>	Jurisdiction Wide
	<b>Goals Supported</b>	2C. Increase Affordable Rental Hsing Opportunities
	<b>Needs Addressed</b>	Neighborhood Revitalization
	<b>Funding</b>	HOME: \$59,976

	<b>Description</b>	HOME program administration for PY 2022.
	<b>Target Date</b>	8/31/2023
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	N/A
	<b>Location Description</b>	Citywide
	<b>Planned Activities</b>	Planning and Administration activities associated with, and in support of the HOME Program. The allocation for planning and administration will be used to ensure compliance with HOME requirements, and no more than 10% of the allocation will be spent on administration. The City receives a HOME Match well in excess of the 25% match requirement for the HOME program. In each of the past two years the City reported at least \$630,000 as match from the Blue Rio Pilot project, which entered into a payment in lieu of taxes (PILOT) program with the City of Mount Vernon. The City anticipates a similar amount in PY 2022 which it will use as the match. Total excess match carried over to next year will be \$4,303,483.
5	<b>Project Name</b>	HOME: CHDO Set-Aside 15%
	<b>Target Area</b>	Jurisdiction Wide
	<b>Goals Supported</b>	2C. Increase Affordable Rental Hsing Opportunities
	<b>Needs Addressed</b>	Neighborhood Revitalization
	<b>Funding</b>	HOME: \$89,965
	<b>Description</b>	As per HOME grant regulations, the City has set aside 15% for CHDO development activities for eligible LMI households.
	<b>Target Date</b>	8/31/2023
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	Rental units rehabilitated: 2 Household Housing Unit
	<b>Location Description</b>	Citywide
	<b>Planned Activities</b>	CHDO affordable housing development activities.
6	<b>Project Name</b>	HOME: TBRA
	<b>Target Area</b>	Jurisdiction Wide
	<b>Goals Supported</b>	2C. Increase Affordable Rental Hsing Opportunities

<b>Needs Addressed</b>	Neighborhood Revitalization
<b>Funding</b>	HOME: \$449,823
<b>Description</b>	The City will utilize HOME funds for Tenant-based rental assistance for eligible LMI households.
<b>Target Date</b>	8/31/2023
<b>Estimate the number and type of families that will benefit from the proposed activities</b>	Provide tenant based rental assistance for approximately 40 households.
<b>Location Description</b>	Citywide
<b>Planned Activities</b>	Provide tenant based rental assistance

## AP-50 Geographic Distribution – 91.220(f)

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

The City will make funds available jurisdiction-wide and may target funds to Opportunity Zones.

- Opportunity Zones: The federal Tax Cuts and Jobs Act of 2017 created the Opportunity Zone program, which is a tool designed to spur economic development and job creation in distressed communities by providing tax benefits to investors. Localities qualify as Opportunity Zones if they have been nominated for that designation by the state and that nomination has been certified by the Secretary of the US Treasury. Census tract 36119003100 in Mount Vernon has been designated an Opportunity Zone. The City recognizes the importance and promise of having these designations and is prepared to invest in this area to support revitalization by targeting funds for infrastructure and public facilities development.

Program-wide, federal CDBG and HOME funds provide low and moderate income households with decent housing, a suitable living environment, and expanded economic opportunities. Eligible activities include community facilities and improvements, housing preservation and rehabilitation, affordable housing development activities, public services, economic development, planning, and administration.

Funding priorities are based upon the following criteria:

- Meeting statutory requirements of the CDBG and HOME Programs
- Meeting the needs of low and moderate income (LMI) residents
- Focusing on LMI areas or neighborhoods
- Impacted areas of concentrated minorities or LMI persons
- Coordination and leveraging of resources
- Links to ongoing planning activities
- Response to expressed needs
- Ability to demonstrate measurable progress and success

### Geographic Distribution

Target Area	Percentage of Funds
Jurisdiction Wide	100
Opportunity Zones	

Table 8 - Geographic Distribution

### Rationale for the priorities for allocating investments geographically

These areas were identified during the public survey and by stakeholders as most in need of investment.



The Jurisdiction-Wide includes all Census Tracts that have a majority of low-income households. Opportunity Zone has been included as a target area under this Consolidated Plan.

In addition, the annual planning process gathered input from community members regarding housing, neighborhood improvements, including public safety and infrastructure improvements needed in specific neighborhoods. All comments were considered when prioritizing activities and improvements.

# Affordable Housing

## AP-55 Affordable Housing – 91.220(g)

### Introduction

The City of Mount Vernon is planning to utilize HOME funds for tenant based rental assistance (TBRA) to assist LMI households attain affordable housing and to avoid homelessness. As per HOME grant regulations, the City has set aside 15% for CHDO development activities for eligible LMI households.

<b>One Year Goals for the Number of Households to be Supported</b>	
Homeless	0
Non-Homeless	42
Special-Needs	0
Total	42

**Table 9 - One Year Goals for Affordable Housing by Support Requirement**

<b>One Year Goals for the Number of Households Supported Through</b>	
Rental Assistance	40
The Production of New Units	0
Rehab of Existing Units	2
Acquisition of Existing Units	0
Total	42

**Table 10 - One Year Goals for Affordable Housing by Support Type**

### Discussion

HOME:

Tenant-based rental assistance: 40 LMI Households Assisted

Rental units rehabilitated (CHDO): 2 LMI Household Housing Unit

## **AP-60 Public Housing – 91.220(h)**

### **Introduction**

Not applicable. The City of Mount Vernon does not have any public housing or a Public Housing Authority.

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

Not applicable. The City of Mount Vernon Urban Renewal Agency does not have any public housing or a Public Housing Authority.

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

Not applicable. The City of Mount Vernon does not have any public housing or a Public Housing Authority.

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

Not applicable. The City of Mount Vernon Urban Renewal Agency does not have any public housing or a Public Housing Authority.

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

### **Introduction**

The Mount Vernon Urban Renewal Agency strives to find innovative ways to reduce and end homelessness in the City of Mount Vernon. The Mount Vernon Urban Renewal Agency participates in a coordinated effort to house homeless individuals through the Westchester Continuum of Care (COC). The following section describes how this need will be addressed.

### **Describe the jurisdictions one-year goals and actions for reducing and ending homelessness including:**

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

The City participates in a coordinated effort to house homeless individuals, families, and homeless veterans who are living on the street or in homeless shelters, through the homeless outreach efforts of the Westchester CoC. Homeless individuals identified through this outreach can be housed by the linked Mount Vernon CoC Permanent Supportive Housing.

In PY 2022, Mount Vernon and the other members of the Board of the Westchester County CoC recommended that ESG recipients fund additional Street Outreach activities during the next opportunity to distribute ESG funds within the Westchester County Continuum of Care geographic area. Westchester County has recently lost significant capacity for Street Outreach; ESG funding is identified as a significant source of new funding for these activities.

#### **Addressing the emergency shelter and transitional housing needs of homeless persons**

The City of Mount Vernon and the Westchester County CoC Board recommended that ESG recipients and subrecipients administering Rapid Re-housing projects target eligible participants currently homeless and living in Transitional Housing for homeless persons. This population is eligible for Rapid Re-housing funded with ESG but is not currently eligible for Rapid Re-housing funded with Continuum of Care (which may only serve homeless households living on the streets, in emergency shelter, or fleeing domestic violence).

The City supports organizations that provide essential services to homeless individuals and families and outreach to the unsheltered homeless. This includes providing CDBG funds for eviction prevention and mortgage foreclosure prevention. The City may include providing ESG funds for services including education, counseling, employment assistance, food/nutrition and health/medical services, case management, and other similar activities, as well as for street outreach to unsheltered homeless to help address their need for supportive services.

**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 City of Mount Vernon administers CoC Permanent Supportive Housing (PSH) projects, including beds targeted to Veterans and families with children. Participants in these PSH project receive housing plus supportive services including case management and linkages to community services and benefits.

Mount Vernon also provides funding to several community-based organizations, which provide outreach and referral services to the homeless or those at-risk of homelessness including recently released female inmates, pregnant teens, families with housing problems and immigration needs and the elderly.

The City has historically supported individuals and families that are participating in CoC programs that work to prevent substance abuse and or chronic homelessness. They include veterans, families, and individuals who may suffer from these issues.

The City will also work to ensure that all beds are filled and we are currently filling beds as funding becomes available. In recent program years the capacity of these shelter beds have reached their maximum.

The City has previously programmed ESG funds to support homeless households from becoming homeless again through the rapid rehousing program. Rapid rehousing provides rental assistance to house families and begin the transition to permanent or independent living.

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

The City supports organizations that provide essential services to homeless individuals and families and outreach to the unsheltered homeless. This includes providing CDBG funds for eviction prevention and mortgage foreclosure prevention. The City may include providing ESG funds for services including education, counseling, employment assistance, food/nutrition and health/medical services, case management, and other similar activities, as well as for street outreach to unsheltered homeless to help address their need for supportive services.

One of the organizations the City works with is the Mount Vernon United Tenants Association (MVUTA). The MVUTA sends out bi-monthly mailing to their local Mount Vernon member families. Over 200 members receive flyers outlining United Tenants' services. Client intake is performed in MVUTA offices, where staff help clients prepare documents, and conduct case-management services for at-risk tenants. MVUTA also works closely with Legal Services of the Hudson Valley and Westchester Residential Opportunities, including regularly co-sponsoring public forums with both organizations.

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

### **Introduction:**

The City of Mount Vernon will continue to work towards removing barriers to affordable housing. The City will work to implement listed strategies in the upcoming year. This section describes some of the actions that the City will take to alleviate the barriers to affordable housing in Mount Vernon.

### **Actions it planned to remove or ameliorate the negative effects of public policies that serve as barriers to affordable housing such as land use controls, tax policies affecting land, zoning ordinances, building codes, fees and charges, growth limitations, and policies affecting the return on residential investment**

The City will continue to collaborate with local housing and community development organizations to foster and maintain affordable housing. The City will take a comprehensive approach to revitalize neighborhoods utilizing HOME funds. Over the course of the Consolidated Plan period, the City anticipates HOME funds will be used to establish a homebuyer assistance program and a homeowner residential rehabilitation program.

The City will work towards creating more homes and preserving homes especially for persons in various protected classes by carrying out activities that address the following objectives.

- Preserve the supply of existing affordable homes. The goal focuses on expanding efforts to invest in homeownership rehabilitation grants, foreclosure prevention and other efforts to prevent the loss of homeownership.
- Develop new affordable housing opportunities. This goal focuses on expanding efforts to create new affordable homeownership units.
- Increase housing choice for low, moderate, and middle-income households

At this time, in PY 2022 the City is addressing the needs of its LMI residents with TBRA to help them avoid homelessness.

In addition, the City is partnering with Westchester Residential Opportunities to host four housing webinars to help homeowners avoid foreclosure when they have fallen behind on their mortgage payments. The webinars will be livestreamed on Facebook and YouTube. The focus will be on homebuyer assistance and will cover down payment and closing costs grant funding currently available for Westchester Country residents. The webinar will also cover information on how to prevent housing discrimination and how to avoid foreclosure.

## **AP-85 Other Actions – 91.220(k)**

### **Introduction:**

The City will continue supporting and coordinating assistance among advocacy groups providing services to the underserved non-homeless special needs population. Other actions that are discussed in this section that are planned for PY 2022 are plans to reduce lead-based paint hazards in the City, actions to foster and maintain affordable housing, actions to help families in poverty, actions to improve and develop the institutional structure and actions to enhance coordination between public and private organizations.

### **Actions planned to address obstacles to meeting underserved needs**

One of the greatest obstacles to meeting the underserved needs is the amount of funding available. To combat this issue, the Mount Vernon Urban Renewal Agency (URA) partners with many agencies to create larger and more sustainable impacts in the community. The City will continue to strive to overcome the obstacles of the underserved by:

#### *Leveraging its resources*

- The Planning Department/MVURA will continue partnering with housing and service organizations to create permanent supportive housing units for the homeless.
- The Planning Department/MVURA staff will continue to research, apply for, and manage competitive and non-competitive grant opportunities to fund and enhance community development activities in Mount Vernon.
- The Planning Department/MVURA staff will research ways in which funded activities can be paired with other funding sources or programs to lower costs for residents or make services more available.
- The requests for proposals for public services may prioritize projects that leverage other funding sources with entitlement funds.

#### *Assisting households increase their income and assets*

- The Planning Department/MVURA staff will continue to fund public services including job training and other assistance programs to help individuals secure a job to increase their family income.
- The Planning Department/MVURA staff will look for ways to expand economic development opportunities for low and moderate income persons.

### **Actions planned to foster and maintain affordable housing**

The City will continue to collaborate with local housing and community development organizations to



foster and maintain affordable housing. The City will take a comprehensive approach to revitalize neighborhoods utilizing HOME funds. At this time, in PY 2022 the City will fund TBRA activities and target eligible low- to moderate-income households within the City.

### **Actions planned to reduce lead-based paint hazards**

Lead-based paint hazards continues to be an issue in the City of Mount Vernon as almost all of the housing in the City was constructed prior to 1978. The City relies on the County to address abatement of lead-based paint in Mount Vernon's aged housing stock. Buildings and properties identified as potential hazards are referred to the County of Westchester Department of Health or to the Westchester County Department of Planning-administered Lead Safe Westchester program for appropriate action.

### **Actions planned to reduce the number of poverty-level families**

The Planning Department/MVURA provides many services intended to help reduce the number of persons in poverty. The activities identified in this plan also work directly to address poverty in Mount Vernon. Further, the Planning Department/MVURA will carry the following strategies and actions over the next year to help families achieve financial stability.

#### *Increasing income*

- Fund workforce development, job training, and educational programs to increase a person's potential income.
- Work with businesses to increase the number of jobs available, especially higher wage jobs. For low-and-moderate-income persons.

#### *Building Savings*

- Work with banks and non-profit organizations to increase financial awareness, homebuyer counseling, and general financial literacy concerns.

#### *Rental Assistance*

- The City will provide TBRA financial assistance to LMI households. Housing families in stable housing will help them in their goal of self-sufficiency.

### **Actions planned to develop institutional structure**

The City of Mount Vernon Office of Planning and Community Development/Mount Vernon Urban Renewal Agency is responsible for the administration of its HUD CPD program. Effective delivery of the program requires constant communication and coordination with numerous City Departments, non-

profit agencies, potential residential and commercial consumers, and other funding agencies.

Gaps in the institutional structure are the result of staff turnover, change in agency leadership, lack of training, and lack of full-time employees to support the work. Within the Office of Planning and Community Development, duties are conducted by one staff person with consultants providing support as available or needed. The lack of staff makes it challenging to adequately deliver grant programs, monitoring requirements, write program manuals and strengthen the grant program structure. In the PY, the City will continue to strengthen the institutional structure through the use of consultants and continuing work on its established programs.

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

The Department of Planning and Community Development/Mount Vernon Urban Renewal Agency leads the Annual Action Plan development process. Meetings are held on a regular basis with service providers to oversee strategy implementation and to ensure coordination of efforts at the local level. The Planning Department/MVURA will also continue to enhance coordination efforts between housing and social service agencies. Some of these efforts are included in the following:

Westchester Continuum of Care - The CoC brings together local units of government, housing providers, and service providers to strategize and plan for future activities to address homelessness in the Mount Vernon area. As a member of the CoC Steering Committee, and various CoC workgroups, the Planning Department/MVURA will continue the implementation of the integrated care service delivery model for permanent supportive housing units by partnering with federal qualified health centers, mental health providers, and homeless service providers.

The Westchester CoC funds HMIS, the primary data system used to track information related to the region's homeless population. Westchester County Department of Social Services (DSS) serves as the HMIS lead agency for Westchester CoC. Such data informs efforts to address the needs of the chronically homeless in the County.

WestHELP operates a County Department of Social Services (DSS)-funded emergency shelter for households with children within the City of Mount Vernon, with capacity for 46 families. Through the DSS District Office at 100 East First Street in Mount Vernon, families and individuals also have access to other DSS funded shelters, transitional housing, homeless prevention funds, and mainstream benefits such as Medicaid, SNAP, NYS CHIP, WIC, and TANF.

## Program Specific Requirements

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

#### Introduction:

This section describes the program specific requirements for CDBG and HOME. In PY 2022, the City of Mount Vernon is not a recipient of ESG funds.

#### Community Development Block Grant Program (CDBG) Reference 24 CFR 91.220(I)(1)

Projects planned with all CDBG funds expected to be available during the year are identified in the Projects Table. The following identifies program income that is available for use that is included in projects to be carried out.

1. The total amount of program income that will have been received before the start of the next program year and that has not yet been reprogrammed	0
2. The amount of proceeds from section 108 loan guarantees that will be used during the year to address the priority needs and specific objectives identified in the grantee's strategic plan.	0
3. The amount of surplus funds from urban renewal settlements	0
4. The amount of any grant funds returned to the line of credit for which the planned use has not been included in a prior statement or plan	0
5. The amount of income from float-funded activities	0
<b>Total Program Income:</b>	<b>0</b>

#### Other CDBG Requirements

1. The amount of urgent need activities	0
2. The estimated percentage of CDBG funds that will be used for activities that benefit persons of low and moderate income. Overall Benefit - A consecutive period of one, two or three years may be used to determine that a minimum overall benefit of 70% of CDBG funds is used to benefit persons of low and moderate income. Specify the years covered that include this Annual Action Plan.	70.00%

**HOME Investment Partnership Program (HOME)  
Reference 24 CFR 91.220(l)(2)**

1. A description of other forms of investment being used beyond those identified in Section 92.205 is as follows:

Not applicable.

2. A description of the guidelines that will be used for resale or recapture of HOME funds when used for homebuyer activities as required in 92.254, is as follows:

Not applicable.

3. A description of the guidelines for resale or recapture that ensures the affordability of units acquired with HOME funds? See 24 CFR 92.254(a)(4) are as follows:

Not applicable.

4. Plans for using HOME funds to refinance existing debt secured by multifamily housing that is rehabilitated with HOME funds along with a description of the refinancing guidelines required that will be used under 24 CFR 92.206(b), are as follows:

Not applicable.

**Emergency Solutions Grant (ESG)**  
**Reference 91.220(l)(4)**

1. Include written standards for providing ESG assistance (may include as attachment)

The Department of Planning and Community Development/Urban Renewal Agency will require ESG awardees to establish and implement written standards for the ESG program prior to executing contracts that include:

1. Standard policies and procedures for evaluating individuals and families eligibility for assistance under Emergency Solutions Grant (ESG).
  2. Policies and procedures for coordination among emergency shelter providers, essential service providers, homelessness prevention and rapid re-housing assistance providers, other homeless assistance providers, and mainstream service and housing providers
  3. Policies and procedures for determining and prioritizing which eligible families and individuals will receive homelessness prevention assistance and which eligible families and individuals will receive rapid re-housing assistance.
  4. Standards for determining the share of rent and utility costs that each program participant must pay, if any, while receiving homelessness prevention or rapid-rehousing assistance.
  5. Standards for determining how long a particular program participant will be provided with rental assistance and whether and how the amount of that assistance will be adjusted over time.
  6. Standards for determining the type, amount, and duration of housing stabilization and/or relocation services to provide a program participant, including the limits, if any, on the homelessness prevention or rapid rehousing assistance that each program participant may receive, such as the maximum amount of assistance, maximum number of months the program participants may receive assistance.
2. If the Continuum of Care has established centralized or coordinated assessment system that meets HUD requirements, describe that centralized or coordinated assessment system.

The Coordinated Entry system is funded using local funding and a HUD Continuum of Care grant to Westchester County DSS.

Westchester County Coordinated Entry provides universal access to all people who are experiencing homelessness throughout Westchester County. To ensure accessibility to households in need, the Westchester County Coordinated Entry Process provides access to services from multiple, convenient physical locations where a customer can walk in and be linked to a coordinated entry.

Customers in need may initiate a request for services in person through any of these designated access points, including contact with street outreach workers for persons living in places not meant for human habitation. Each access point in the Coordinated Entry program utilizes the same a

standardized assessment, and all Coordinated Entry participants are entered onto and prioritized using a single by-name list.

Access points include Westchester County DSS district offices (DOs) spread countywide. Anyone can access these district offices to apply for emergency housing as well as mainstream benefits. Each district office has Immediate Needs Assessment Teams to prevent evictions or find alternative housing options. Westchester County also has Coordinated Entry access points at Emergency Shelters and other locations where homeless are offered services.

Unsheltered adults and families are entered into the Coordinated Entry System by mobile outreach workers in the County's eight homeless outreach programs. The County has also trained emergency food programs to refer unsheltered homeless to outreach workers.

A standardized assessment is used at all the Coordinated Entry locations to ensure that persons with the greatest needs receive priority for the housing or homeless services appropriate to their circumstances and preferences, including those funded by CoC, ESG, other Federal, New York State, or local funding.

The Westchester CoC requires that ESG-program funded projects located within the Geographic Boundaries of Westchester County CoC use the Coordinated Entry process for referrals and enrollments.

Persons requiring services provided by ESG projects within Westchester County are able to seek assistance through the set of Coordinated Entry access points. Persons seeking assistance will be screened, assessed and then prioritized and referred to appropriate housing projects through the Westchester County Coordinated Entry Process.

Available ESG Homelessness Prevention and Rapid Re-housing resources will be tracked by Westchester Coordinated Entry. ESG projects use the same prioritization order as that used for other projects of the same type, and will draw from the same by-name list of prioritized potential participants. The Westchester County CoC Written Standards created for the prioritization order for Homelessness Prevention and Rapid Re-housing are consistent with HUD regulations for administering ESG grants.

Street Outreach and Emergency Shelter projects funded with ESG do not use Coordinated Entry to locate, enroll, and serve clients. Consistent with HUD guidelines, access to all emergency services located within the CoC (including Street Outreach and Emergency Shelter) is not prioritized based on severity of need or vulnerability allowing for immediate response.

However, all Street Outreach and Emergency Shelter projects funded with ESG are required to act as access points, and refer participants to Coordinated Entry for screening, assessment, prioritization, and referral to appropriate housing.

3. Identify the process for making sub-awards and describe how the ESG allocation available to private nonprofit organizations (including community and faith-based organizations).

Subrecipients received a one year contract for the proposed activities with an option for renewal for successful performers. The City will meet with subrecipients on a quarterly basis to review performance outcomes. If a subrecipients performance is deemed unsatisfactory, unexpended balances will be recaptured and reallocated to other successful performers.

4. If the jurisdiction is unable to meet the homeless participation requirement in 24 CFR 576.405(a), the jurisdiction must specify its plan for reaching out to and consulting with homeless or formerly homeless individuals in considering policies and funding decisions regarding facilities and services funded under ESG.

The City has adopted the Westchester Continuum of Care policies and procedures as its performance standards and requires all subrecipients to abide by these policies. The City will work with subrecipients to create a survey to capture input from formerly homeless individuals to consider policies and funding decisions regarding services funded under ESG.

5. Describe performance standards for evaluating ESG.

The Westchester Continuum of Care has developed performance standards for ESG projects.

ESG projects are evaluated for compliance with HUD requirements for participant eligibility, HMIS participation, Coordinated Entry utilization, habitability standards, reasonable rent, Fair Housing, and financial regulations.

The City is partnering with two homeless service providers on the following ESG program components: Street Outreach, Rapid Rehousing, Youth Homeless Prevention, Domestic Violence Rapid Rehousing, and Domestic Violence Homelessness Prevention.

Subrecipients will report quarterly via the HMIS system, all outcomes that are required by HUD and/or the City of Mount Vernon. The outcomes report provided on a quarterly basis will include specific performance targets related to number of households housed, number of households served and other metrics appropriate to the program.

In addition, the City will analyze outcomes and indicators in the quarterly reports by race and ethnicity to identify programmatic inequities in specific outcome areas. The data review will consider the indicators of engagements, program exits to permanent housing, and lengths of stay in programs by race and ethnicity, as well as all other CAPER indicators that may demonstrate potential programmatic inequities as identified during the data review and analysis process.

ESG Written standards have been uploaded into the AD-26.