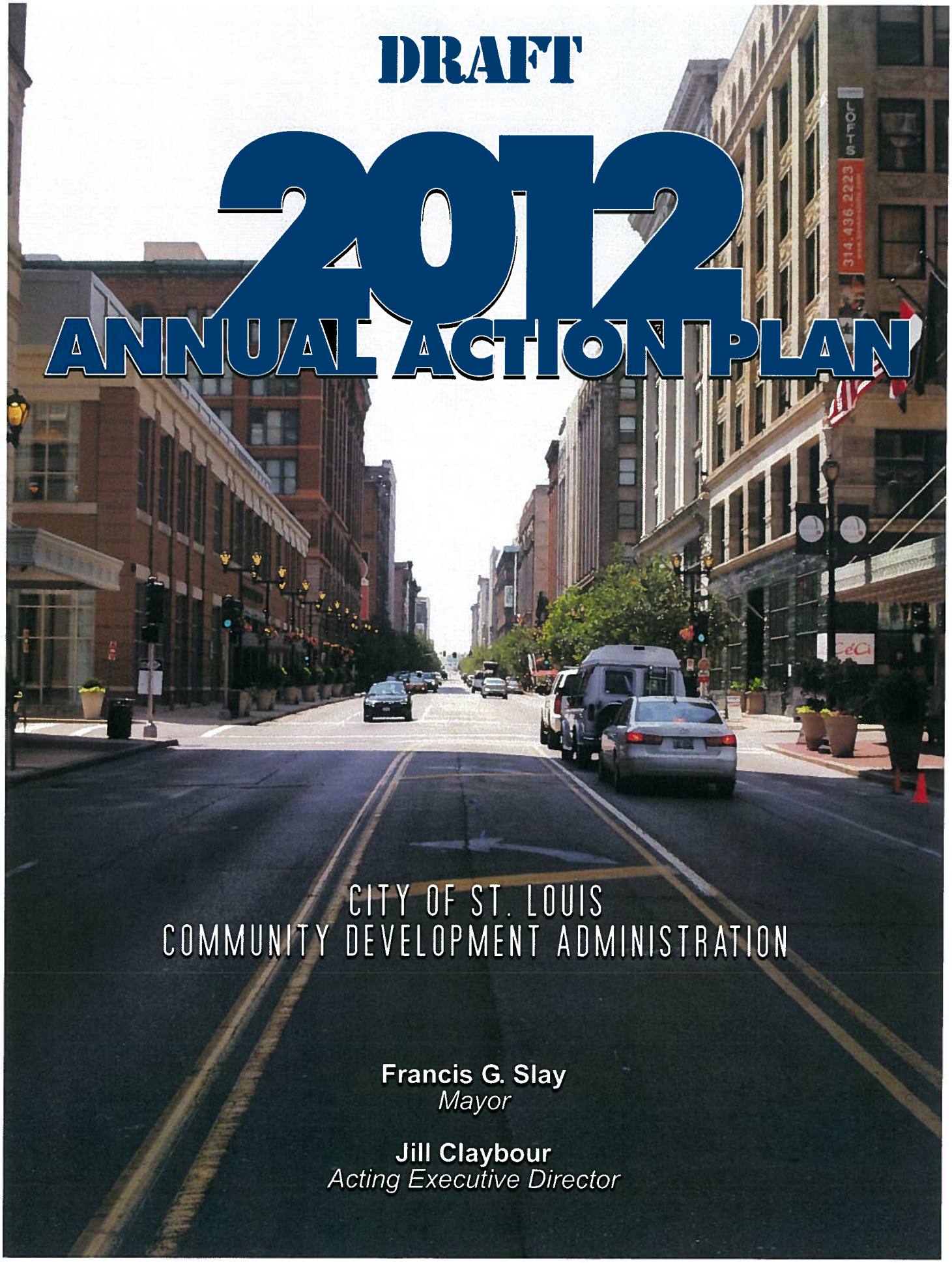

DRAFT

2012 ANNUAL ACTION PLAN

CITY OF ST. LOUIS
COMMUNITY DEVELOPMENT ADMINISTRATION

Francis G. Slay
Mayor

Jill Claybour
Acting Executive Director

City of St. Louis
COMMUNITY DEVELOPMENT ADMINISTRATION

Francis G. Slay
Mayor

Jill Claybour
Acting Executive Director

November 15, 2011

Dear Citizens of St. Louis:

Each year, the City of St. Louis is required to prepare a report highlighting the projects to be undertaken in the coming year through four federal programs that are funded by the U.S. Department of Housing and Urban Development (HUD):

- CDBG - Community Development Block Grant
- HOME - HOME Investment Partnership Funds
- HOPWA - Housing Opportunities for People with AIDS
- ESG - Emergency Shelter Grant

The Annual Action Plan documents the many activities, initiatives and services that will be made possible by these four federal programs. This report also serves as a detailed description indicating which specific components of the City's Five Year Consolidated Plan will be undertaken in 2012.

Those citizens with questions or comments concerning this report are encouraged to contact me at 622-3400 extension 223. You may also forward any questions or comments by e-mail to claybourj@stlouiscity.com.

Sincerely,

Jill Claybour
Acting Executive Director

1015 Locust Suite 1200 St. Louis, Mo. 63101 (314) 622-3400 FAX (314) 622-3413 TDD 259-3435

2012

ANNUAL ACTION PLAN

Francis G. Slay
Mayor

Jill Claybour
Acting Executive Director
Community Development
Administration

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Consolidated Plan
Management Process

CPMP Version 2.0

Grantee Information Worksheet

City of St. Louis			UOG MO294626 ST LOUIS
1015 Locust			DUNS #138251 082 ?
Suite 1200			City of St. Louis
St. Louis			Community Development Administration
Missouri	63101	U.S.A	Executive and Administration
N/A			1/8

Employer Identification Number (EIN):	43-6003231	
Applicant Type:	Local Government: City	Specify Other Type

Person to be contacted regarding this application:		
Jill	R.	Claybour
Acting Executive Director	Phone: 314-622-3400 ext. 223	Fax: 314-259-3461
e-mail: claybourj@stlouiscity.com	www.stlouis.missouri.org	Other Contact

"To the best of my knowledge and belief, all data in this application are true and correct, the document has been duly authorized by the governing body of the applicant, and the applicant will comply with the attached assurances if the assistance is awarded." Please update the date with each new Action Plan and CAPER submission.

Name:	Francis G. Slay	Date: (MM/DD/YY)	11/14/11
Title:	Mayor, City of St. Louis		

CPMP Main Worksheet

SF 424

The SF 424 is part of the CPMP Annual Action Plan. SF 424 form fields are included in this document. Grantee information is linked from the 1CPMP.xls document of the CPMP tool.

SF 424

Complete the fillable fields (blue cells) in the table below. The other items are pre-filled with values from the Grantee Information Worksheet.

Date Submitted 11/15/11	Applicant Identifier	**Type of Submission**	
Date Received by state	State Identifier	**Application**	**Pre-application**
Date Received by HUD	Federal Identifier	☒ Construction	☐ Construction
		☒ Non Construction	☐ Non Construction
Applicant Information			
City of St. Louis		MO294626 ST LOUIS	
1015 Locust		DUNS #138251 082	
Suite 1100		City of St. Louis	
City of St. Louis	Missouri	Community Development Administration	
63101	Country U.S.A.	Administration and Budget Division	
Employer Identification Number (EIN):		County N/A	
43-6003231		01/11	
Applicant Type:		**Specify Other Type if necessary:**	
Local Government: City		Specify Other Type	
Program Funding		**U.S. Department of Housing and Urban Development**	
Catalogue of Federal Domestic Assistance Numbers; Descriptive Title of Applicant Project(s); Areas Affected by Project(s) (cities, Counties, localities etc.); Estimated Funding			
Community Development Block Grant		14.218 Entitlement Grant	
CDBG Project Titles 2012 CDBG Projects		Description of Areas Affected by CDBG Project(s) City of St. Louis, Missouri	
CDBG Grant Amount $17,829,160	Additional HUD Grant(s) Leveraged $5,000,000	Describe Lead Based Paint Hazard Reduction, HUD 202, 811, HOPE VI, NSP, CDBG-Disaster, CDBG-R	
$Additional Federal Funds Leveraged $10,000,000		$Additional State Funds Leveraged $5,000,000	
$Locally Leveraged Funds $10,000,000		$Grantee Funds Leveraged $3,000,000	
$Anticipated Program Income $700,000		Other (Describe)	
Total Funds Leveraged for CDBG-based Project(s) $116,417,000			
Home Investment Partnerships Program		14.239 HOME	
HOME Project Titles 2012 HOME Projects		Description of Areas Affected by HOME Project(s) City of St. Louis, Missouri	
$HOME Grant Amount $4,027,930	$0 Additional HUD Grant(s) Leveraged Included in CDBG	Describe See CDBG	

$0 Additional Federal Funds Leveraged Included in CDBG	$0 Additional State Funds Leveraged Included in CDBG
$0 Locally Leveraged Funds Included in CDBG	$0 Grantee Funds Leveraged Included in CDBG
$Anticipated Program Income $10,000	Other (Describe)
Total Funds Leveraged for HOME-based Project(s) Included in CDBG plus $10,000	

Housing Opportunities for People with AIDS	14.241 HOPWA	
HOPWA Project Titles 2012 HOPWA Projects	Description of Areas Affected by HOPWA Project(s) City of St. Louis, Missouri	
$HOPWA Grant Amount $1,375,810	$Additional HUD Grant(s) Leveraged	Describe
$Additional Federal Funds Leveraged	$0 Additional State Funds Leveraged	
$0 Locally Leveraged Funds	$0 Grantee Funds Leveraged	
$0 Anticipated Program Income	Other (Describe)	
Total Funds Leveraged for HOPWA-based Project(s) $549,000		

Emergency Shelter Grants Program	14.231 ESG	
ESG Project Titles 2012 ESG Projects	Description of Areas Affected by ESG Project(s) City of St. Louis, Missouri	
$ESG Grant Amount $865,483	$9,965,500 Additional HUD Grant(s) Leveraged	Describe Supportive Housing Program
$0 Additional Federal Funds Leveraged	$355,000 Additional State Funds Leveraged	
$4,274,900 Locally Leveraged Funds	$1,440,500 Grantee Funds Leveraged	
$0 Anticipated Program Income	Other (Describe)	
Total Funds Leveraged for ESG-based Project(s) $16,035,900		

Congressional Districts of:		Is application subject to review by state Executive Order 12372 Process?	
Applicant Districts 1st and 3rd	Project Districts 1st and 3rd		
Is the applicant delinquent on any federal debt? If "Yes" please include an additional document explaining the situation.		☐ Yes	This application was made available to the state EO 12372 process for review on DATE
		☒ No	Program is not covered by EO 12372
☐ Yes	☒ No	☐ N/A	Program has not been selected by the state for review

Person to be contacted regarding this application

Jill	T	Claybour
Acting Executive Director	Phone (314) 622-3400 ext. 223	Fax (314) 259-3461
eMail: claybourj@stlouiscity.com	www.stlouis.missouri.org	Other Contact
Signature of Authorized Representative Mayor, City of St. Louis		Date Signed 11/14/11

GENERAL

GENERAL

INTRODUCTION

Beginning in 1974 the federal government has provided annual entitlement support to cities of more than 50,000 people for community development purposes. The amount of funding awarded is based on formulas that measure the level of distress in each community and take into account such factors as population, poverty, housing overcrowding/age, and growth lag. Funding is to be used in the implementation of an annual application and an overall multi-year community development strategy known collectively as the Consolidated Plan.

The City of St. Louis receives annual funding from four programs administered at the federal level by the U.S. Department of Housing and Urban Development. They are:

- Community Development Block Grant (CDBG)
- Home Investment Partnership (HOME)
- Emergency Shelter Grant (ESG)
- Housing Opportunities For Persons With Aids (HOPWA)

While the City's Community Development Administration retains primary local responsibility for all of these programs, programmatic responsibility for the Emergency Shelter Grant rests with the City's Department of Human Services, whereas responsibility for the HOPWA program rests with the Health Department.

AVAILABLE FUNDS

The project and accomplishment goals outlined in this document are based on the projected Program Year 2012 available funding as outlined below.

PROGRAM YEAR 2012	
FEDERAL ENTITLEMENT PROGRAM	**PROJECTED AWARD AMOUNT**
Community Development Block Grant (CDBG)	$17,829,160
Program Income (CDBG)	$700,000
HOME Investment Partnership (HOME)	$4,017,930
Program Income (HOME)	$10,000
Emergency Shelter Grant (ESG)	$865,500
Housing Opportunities for Persons with AIDS (HOPWA)	$1,375,800
TOTAL	**$24,798,390**

EXECUTIVE SUMMARY

The Executive Summary is required. Include the objectives and outcomes identified in the plan and an evaluation of past performance.

The City of St. Louis Consolidated Plan (Program Years 2010-2014) identifies eight high priority areas for directing the course of the City's development activities: Rental and Owner-Occupied Housing, Neighborhood Improvement, Infrastructure, Public Facilities, Public Services, Economic Development, Homeless Needs and Non-Homeless Special Needs. Of these eight areas, only six areas will be completed using CPD formula grant funds: Rental and Owner-Occupied Housing, Neighborhood Improvement, Public Services, Economic Development, Homeless Needs and Non-Homeless Special Needs. The City of St. Louis Consolidated Plan may be viewed in its entirety on the City's website at http://stlouis-mo.gov/government/departments/community-development/documents/2010-14-consolidated-plan.cfm. In addition, the City of St. Louis established a Strategic Land Use Plan to coordinate future development in the City. A complete copy of the Land Use Plan can be viewed on the City's website at http://stlcin.missouri.org/landuse/index.cfm.

The 2012 program year begins January 1, 2012, and marks the third year of the Five Year Consolidated Plan Strategy. CDBG funds constitute the majority of HUD funds received through the Consolidated Planning process (74% in 2011). Funding decreases over the last decade have placed added stress upon programs typically funded through the CDBG program. Reductions since 2001 amount to over $10,500,000 and constitute a funding decrease of over 37% in CDBG funds over ten years, a massive reduction. Funding at the anticipated 2012 level will fall short of needs for stabilizing public services and is totally inadequate to address increased costs due simply to inflation.

Although housing will remain the primary focus of both the CDBG and HOME programs, with funding provided for acquisition financing, development cost write-downs and buyer affordability there will be increased emphasis on home repair. In some parts of the City, CDA funds budgeted for home repair are being administered in whole or in part at the neighborhood level. In other parts of the City, home repair application intake is being handled at the neighborhood level, while construction management continues to take place through a centralized program. In still other neighborhoods, CDA is handling application intake while construction management is centralized.

Economic development will also remain a major initiative in the 2012 program year. CDBG funds will be used to attract and retain businesses and create or retain jobs for low and moderate income people through loans and grants. Another program will offer grants for facade and public improvements within commercial districts serving low and moderate income residents of nearby residential areas.

In addition to using the limited amounts of HUD funds available for these purposes, the City will make use of other federal, local and state economic development incentives, including tax increment financing and a variety of state and federal tax credits, for economic and residential development purposes. The City will also use dedicated City funds made available

through the City's Affordable Housing Commission to assist in residential development, the development of permanent supportive housing, foreclosure prevention, residential repairs and accessibility modifications, homeless services, and a variety of other residential activities that provide assistance to individuals and families with incomes at or below 80% of the SMSA median.

SUMMARY OF OBJECTIVES AND OUTCOMES

Consolidated funds for the 2012 program year will be allocated among the following objectives and outcomes established by HUD through the CPD Outcome Performance Measurement System:

	Availability/ Accessibility	Affordability	Sustainability
Create a Suitable Living Environment	14%	<1%	18%
Provide Decent Housing	21%	13%	19%
Create Economic Opportunities	5%	0%	9%

Creating Suitable Living Environments: Availability/Accessibility

Thirteen projects will be supported with 2012 funds to improve access to public services that improve the living environment for low- and moderate-income persons.

The following activities provide opportunities for enrichment for low- and moderate-income youth, including at-risk youth. Many of these activities encourage leadership skills and provide after-school educational, recreational and mentoring opportunities to help youth participants develop the skills needed to achieve personal, educational, and future employment success.

- St. Louis Board of Education – Community Education Centers (CDBG)
- City of St. Louis Department of Parks, Recreation & Forestry – Expanded Recreation (CDBG)
- Better Family Life, Inc. – Better Family Life Urban Rhythms (CDBG)
- Youth & Family Center – Youth & Family Center Services (CDBG)

The following activities provide opportunities to maintain and enhance the quality of life for the City's senior and special needs populations by providing Meals on Wheels, transportation services, recreational services, outreach, health screenings and nutrition education.

- Bevo Area Community Improvement Corp. – Bevo Senior Services (CDBG)
- St. Louis Area Agency on Aging – Elderly Services (CDBG)
- Union Sarah Senior Citizen Center, Inc. – Union Sarah Senior Center Services (CDBG)

The following activities provide food, shelter, and other emergency needs for low-income and homeless residents.

- Hi-Pointe Center, Inc. – Hi-Pointe Center (CDBG)
- Catholic Charities – Housing Resource Center (CDBG, ESG)
- City of St. Louis, Department of Human Services – Essential Services (ESG)
- City of St. Louis, Department of Human Services – Operations (ESG)

The following activities provide access to health services, mental health counseling, nutrition services, public health nursing and quality health education that will support informed decisions in risk reduction behaviors for low- and moderate-income residents.

- Family Care Health Centers – Adult Medicine (CDBG)
- Community Health-In-Partnership, Inc. – Community Health-In-Partnership Services (CDBG)

Providing Decent Affordable Housing: Availability/Accessibility

Six projects funded in the 2012 program year will provide accessibility for the purpose of providing decent, safe and sanitary housing.

Four activities related to one of the projects will improve the quality of and accessibility to decent, safe and sanitary housing for low and moderate income individuals and families and quality of life in low and moderate income neighborhoods through inspection services, emergency and other home repair including code-related repair, code rehabilitation, lead hazard reduction, home improvement forgivable and deferred payment loans and loan servicing activities.

- Home Repair Program Administration – Construction Rehab (CDBG, HOME)
- Home Repair Program Loan Pod - Owner-Occupied Rehabilitation and Repair (CDBG, HOME)
- City of St. Louis Building Division – Healthy Home Repair Program – Inspection Services (CDBG)
- Carondelet Community Betterment Federation – Carondelet Housing Program (CDBG, HOME)

One project will provide minor home repair services, safety and security modifications, energy/weatherization services, and accessibility modifications for elderly and disabled homeowners as well as homeowners and renters with disabilities.

- Home Services, Inc. – Senior Home Security (CDBG)

Two projects will provide housing information and supportive services to help low- and moderate-income households that include persons with HIV/AIDS access decent housing.

- City of St. Louis, Department of Health – Housing Information Services (HOPWA)
- City of St. Louis, Department of Health – Supportive Services (Case Management) (HOPWA)

Creating Economic Opportunities: Availability/Accessibility:

Two projects supported by 2012 funds will provide availability and accessibility for the purpose of creating and retaining jobs and economic opportunities for low and moderate income residents.

One activity will provide funds to encourage commercial and industrial development through direct financial assistance to private for-profit businesses, micro-enterprise assistance and development and the acquisition of commercial and other property. The goal of this program is to retain and/or create jobs for low-moderate income persons by providing attractive project financing and suitable sites and business facilities. Most loans require a firm commitment of private financing to leverage the program funds, acceptable job creation or retention goals, and an agreement to accept entry-level job referrals from the St. Louis Agency on Training and Employment (SLATE).

- Local Development Company - Business Development Support Program (CDBG)

The other project will assist individuals with improved access to economic opportunities and job-related services.

- Carondelet Community Betterment Federation, Inc. - Carondelet Family Literacy Program (CDBG)

Creating Suitable Living Environments: Affordability

Funds from the 2012 Program Year will support a project that will assist individuals by improving affordability for the purpose of creating a suitable living environment. The activity will provide quality affordable child care services to children ages six weeks to ten years old to allow parents in public housing to retain employment, attend school or enroll in job training programs.

- Vaughn Tenant Association - Elmer Hammond Day Care (CDBG)

Providing Decent Affordable Housing: Affordability

Nine projects will be funded in 2012 to help improve the affordability of decent housing through direct housing related services and/or the creation and rehabilitation of housing units. Four of these activities will result in the creation or rehabilitation of affordable owner-occupied and rental housing units for low-and moderate-income households.

- City of St. Louis Community Development Administration - Owner-Occupied - Affordable Rehab (CDBG, HOME)
- City of St. Louis Community Development Administration - Owner-Occupied - Affordable New Construction (CDBG, HOME)
- City of St. Louis Community Development Administration - Rental Housing - Affordable Rehab (CDBG, HOME)
- City of St. Louis Community Development Administration - Rental Housing - Affordable New Construction (CDBG, HOME)

One activity will help improve the affordability of decent housing by providing for education, counseling, investigation and enforcement of fair housing laws.

- Metropolitan St. Louis Equal Housing Opportunity Council - Equal Housing Opportunity Program (CDBG)

Two activities will provide services such as rent, mortgage and utility assistance to assist in preventing individuals from becoming homeless in the City of St. Louis.

- City of St. Louis, Department of Human Services – Prevention Services (ESG)
- City of St. Louis, Department of Health – Short Term Rent, Mortgage, Utility Payments (HOPWA)

Two activities will provide facility-based housing and tenant-based rental assistance to help low- and moderate-income households with special needs afford to move into decent housing.

- City of St. Louis, Department of Health – Tenant Based Rental Assistance (HOPWA)
- City of St. Louis, Department of Health – Facility-Based Housing Assistance (HOPWA)

Creating Economic Opportunities: Affordability

In addition to direct financial assistance to businesses and other employers in St. Louis to provide economic opportunities for low- and moderate-income persons, the following economic development activity will focus primarily on making capital affordable for businesses that improve the economic health of the community. Grants or low-interest loan assistance will be

made available to micro enterprises or small businesses that would otherwise not be able to afford the capital to start or expand their operations.

- Local Development Company - Business Development Support - Micro enterprises (CDBG)

Creating Suitable Living Environments: Sustainability

Twenty-three projects carried out through 24 activities will be supported in Program Year 2012 to sustain the physical environment in St. Louis's low- and moderate-income neighborhoods.

- Carondelet Community Betterment Federation, Inc. – Carondelet CBDO Program (CDBG, HOME)
- Central West End – Midtown CDC – Central Corridor CBDO Program (CDBG)
- DeSales Community Housing Corp. – DeSales CBDO (CDBG)
- DeSales Community Housing Corp. - Management Assistance Program (CDBG)
- Dutchtown South Community Corporation – Dutchtown South CBDO Program (CDBG)
- Grand Oak Hill Community Corp. – Grand Oak Hill CBDO Program (CDBG)
- Hamilton Heights Neighborhood Organization, Inc. – Hamilton Heights CBDO Program (CDBG)
- St. Louis Development Corp. - Land Reutilization Authority Maintenance/Board Up (CDBG)
- UJAMAA and the Black Family Land Trust -- UJAMAA CDBO Program (CDBG)
- The Acts Partnership – The Acts Partnership CBDO Program (CDBG)
- Old North St. Louis Restoration Group – Old North St. Louis CBDO Program (CDBG)
- Department of Parks, Recreation and Forestry – Operation Brightside Clean-Up/Graffiti Eradication (CDBG)
- City of St. Louis City Counselor's Office – Problem Property Team Program (CDBG)
- City of St. Louis Department of Public Safety – Problem Property Team Program (CDBG)
- St. Louis City Courts – Problem Property Team Program (CDBG)
- Riverview-West Florissant Housing Corp. – Targeted Management Assistance Program (CDBG)
- Shaw Neighborhood Housing Corp. – Shaw Neighborhood Revitalization and Development Program (CDBG)

- Skinker-DeBaliviere Community Council – Skinker-DeBaliviere CBDO Program (CDBG)
- Southwest Neighborhood Improvement Association – Southwest CBDO Program (CDBG)
- To be determined – Third Ward Revitalization (CDBG)
- Vashon/Jeff-Vander-Lou Initiative – Vashon/JVL Renaissance CBDO Program (CDBG)
- Greater Ville Preservation Commission - Greater Ville CBDO Program (CDBG)
- To be determined - 26th Ward Revitalization (CDBG)
- To be determined - Targeted Management Assistance Program

Providing Decent Housing: Housing: Sustainability

2012 Program Year funds will assist four projects that will provide for the rehabilitation of vacant and deteriorated rental and owner-occupied properties. HUD funds are expected to assist with acquisition financing, interim financing and "gap" financing through repayable, forgivable and deferred payment loans that write down development costs to produce owner-occupied and rental homes in blighted areas of the City. In areas where significant numbers of vacant lots exist, it is also anticipated that newly constructed rental and owner-occupied homes will be developed by Community Based Development Organizations. These newly constructed and substantially rehabilitated homes are expected to provide decent, safe and sanitary living environments for existing City residents and to attract new residents to the City. Repopulating dense urban environments that are both "walkable" and have ready access to public transportation is an inherently sustainable activity, as is rehabilitating existing homes where feasible rather than constructing new. It is also anticipated that some infrastructure improvements associated with these homes will incorporate features to enhance environmental sustainability.

- City of St. Louis Community Development Administration - Owner-Occupied - Market Rate Rehab (CDBG)
- City of St. Louis Community Development Administration - Owner-Occupied - Market Rate New Construction (CDBG)
- City of St. Louis Community Development Administration - Rental Housing - Market Rate Rehab (CDBG)
- City of St. Louis Community Development Administration - Rental Housing - Market Rate New Construction (CDBG)

Creating Economic Opportunities: Sustainability

Three projects using 2012 CPD funds will provide public service and economic development activities to sustain economic opportunities.

Two of these projects will contribute to the stabilization and redevelopment of obsolete neighborhood commercial districts by providing for façade enhancements, accessibility enhancements and/or public infrastructure improvements in commercial areas throughout the City. Accessibility improvements will include construction and/or alterations to provide accessible entry-ways and accessible restrooms.

- City of St. Louis Office of the Disabled -- Accessible Businesses Lead Everywhere (CDBG)

- St. Louis Development Corporation -- Neighborhood Commercial District Incentives Program (CDBG)

Another project provides quality adult day care for seniors and people with disabilities in a community setting, enabling family care givers to remain employed.

- St. Elizabeth Adult Day Care Center -- St. Elizabeth Adult Day Care Center (CDBG)

EVALUATION OF PAST PERFORMANCE

The City of St. Louis's Consolidated Plan (Program Years 2010-2014) identifies eight high priority areas for directing the course of the City's development activities: Rental and Owner-Occupied Housing, Neighborhood Improvement, Infrastructure, Public Facilities, Public Services, Economic Development, Homeless Needs and Non Homeless Special Needs.

Rental and Owner-Occupied Housing:

The primary goals associated with Rental and Owner-Occupied Housing include increasing the supply and quality of for-sale and rental housing for low income residents, preserving and increasing homeownership, eliminating unsafe buildings and blighted areas, making substantial progress toward achieving the goal of eradicating lead poisoning in St. Louis and supporting the development of targeted neighborhoods with CDBG and HOME funds. Key objectives and accomplishments related to Rental and Owner-Occupied Housing projects for 2010 are as follows:

- *Encourage/Incent New Construction/Rehabilitation of Affordable Rental/Owner-Occupied Housing Units:*

In 2010 the City provided assistance to developers that allowed for the completion of 31 affordable housing units, of which only four were directly subsidized. All were newly constructed. The continued stagnation in the housing market, tight credit and lending standards, and persistent unemployment nationwide have had a very significant impact on affordable for-sale production. As for rental production, fluctuation is inherent in the practice of reporting the completion of all units in large rental complexes at once and may not necessarily indicate any significant increase in activity and investment. On the other hand, confusion and delay in awarding of low-income housing tax credits during 2009 did result in a 2010 production drop.

The effects of continuing increases in labor and materials costs, combined with declining household incomes and the shortage of available federal subsidy dollars, are also evident.

- *Encourage/Incent New Construction/Rehabilitation of Market Rate Rental/Owner Occupied Housing Units:*

In 2010 the City provided assistance to developers that allowed for the completion of 14 market rate housing units, 11 of which were for sale and three of which were rental. New construction sponsored or directly developed by Community Based Development Organizations accounted for eight of the units. The remaining six units were substantially rehabilitated, with many also taking advantage of state historic and neighborhood preservation tax credits.

- *Maintain/Improve Existing Housing Quality Through Home Repair Activities*

In 2010 a total of 249 households were assisted through City-funded home repair programs, of which 58 were through Rebuilding Together. The 249 homeowners fell short of the City's one year goal (270 units), largely due to the slow start up time by new agencies administering a decentralized version of the program, as well as the limited availability of CDBG funds.

Minor home repairs were undertaken by Home Services, Inc., Carondelet Community Betterment Federation and Riverview West Florissant Corporation. Collectively, the agencies completed 749 minor home repair projects, which exceeded the 2010 goal of 700 projects completed. In addition, the agencies completed over 3,400 minor home repairs in the 749 projects.

- *Make Substantial Progress in Implementing the Mayor's Comprehensive Action Plan to Eradicate Lead Poisoning by 2010*

During 2010 a total of 746 lead hazard evaluations were conducted by the Building Division's Lead Inspection Department. Of those inspections, 35% occurred because of an elevated blood-lead level investigation, meaning that a child with lead poisoning had been associated with the unit. This shows that the majority of the referrals fell into the category of primary prevention, which is a positive development in that the occupants of these units have not been lead poisoned. These inspections provided an opportunity to prevent lead poisoning by remediating the units now in order to protect current and future occupants. In addition, the Building Division under the Healthy Home Repair Program conducted 95 risk assessments. Nearly all of these were under the category of primary prevention.

Through various City-funded initiatives, 717 housing units were remediated and cleared of lead hazards in 2010. Several funding sources were used to accomplish the remediation of these units, including federal funds and the Building Division's Lead Remediation Fund. Four HUD Lead Grants allowed for the remediation of 412 housing units. Another 57 units were made lead-safe through the Healthy Home Repair Program, most of which fell into the primary prevention category. Another six units were completed and cleared of lead hazards through CDA's Residential Development Section. The owners completed the repairs in another 242

units, and the Building Division conducted clearance testing to determine that the units were lead-safe.

Neighborhood Improvement:

The primary goals associated with Neighborhood Improvement include supporting development, expanding and implementing effective Management Assistance support and reducing the number of problem and nuisance properties in targeted neighborhoods with CDBG funds. Key objectives and accomplishments related to Neighborhood Improvement projects for 2010 are as follows:

- *Continue to support Community Based Development Organizations (CBDO's)*

Nineteen local community development corporations (CDC's) carried out activities designed to improve housing or public facilities within their service areas. These non-profit corporations are community based, with a defined geographic service area.

Infrastructure and Public Facilities:

The primary goal associated with infrastructure and public facilities is to build or enhance public capital improvements to serve the diverse needs and constituencies of the City of St. Louis.

Public Services:

The primary strategies associated with Public Services are aimed at achieving family self-sufficiency by assisting organizations in providing public supportive services for youth, seniors and low and moderate income individuals including recreational activities, community education, elderly meals-on-wheels, after-school programs, adult and child day care services, youth employment training and health care through the use of CDBG funds. Key objectives and accomplishments of Public Services projects for 2010 are as follows:

- *Promote family self-sufficiency by aiding public supportive service activities*

In 2010 2,563 seniors were assisted; 10,639 youths participated in various CDBG funded activities including recreational opportunities, after-school programs and employment training; 177 children were provided day care services; 1,124 individuals received fair housing information, 23,149 uninsured or underinsured patients were provided health care; and, 219,684 low and moderate income individuals benefited from various general public service programs. These totals reflect some duplication of services, as numerous individuals may have participated in multiple programs.

Economic Development:

The primary goal associated with Economic Development initiatives includes providing assistance/incentives for accessibility and to retain and attract for-profit, retail businesses and

micro-enterprises to the City and encouraging historic preservation and rehabilitation of business properties through CDBG funds. Key objectives and accomplishments related to Economic Development projects for 2010 are as follows:

- *Provide assistance/incentives to retain/attract businesses to the City*

A total of 198 businesses were provided with economic development assistance in 2010, either through direct loans or through facade or public improvements in commercial districts.

Homeless Needs:

The City utilized CDBG and ESG funds for a number of special needs housing centers and shelters in the area. CDBG and ESG funds were used to provide operating assistance for homeless shelters, assistance to prevent homelessness and supportive services for homeless persons.

- *Make Substantial Progress Toward Eliminating Chronic Homelessness*

In efforts to end chronic homelessness in the City of St. Louis, program providers delivered 18,973 services to homeless people or persons at risk of becoming homeless. This number reflects some duplicated people and greatly exceeds the 2010 goal of providing services to 14,500 people.

Non-Homeless Special Needs:

HOPWA funds were used to provide tenant-based housing assistance, short-term rent, mortgage and utility assistance, facility-based operating assistance and supportive services for transitional housing facilities for persons with HIV/AIDS.

- *Maintain/Improve Services for HIV/AIDS Persons*

Housing assistance remains one of the greatest areas of need for individuals living with HIV and AIDS. The City will coordinate HOPWA grant funds with Ryan White Part A funding to provide a continuum of housing opportunities and supportive services for low-income individuals and families living with HIV/AIDS. HIV/AIDS service agencies providing housing services will receive funding to continue existing programs and to provide new services that address gaps and barriers identified in needs assessment and focus group discussions. Obviously, the City does not have the resources necessary to address all these needs. For the most part, the City will utilize HUD grants, Ryan White grants and other funding sources to carry out activities addressing the needs of non-homeless populations to the extent possible.

Goal	Methodology	2010 Goal	2010 Results	5 Year Goal	Percent of 5 Year Goals Completed	Amount/ Formula Grant Expended[1]
Encourage/Incent New Construction/ Rehabilitation of Affordable Rental/Owner Occupied Housing Units	Provide loan funds for acquisition financing and development cost write-downs	320	4 (31)[2]	1,650	0% (2%)	$2,661,151 HOME
Encourage/Incent New Construction/ Rehabilitation of Market Rate Rental/Owner Occupied Housing Units	Provide loan funds for acquisition financing and development cost write-downs	10	14	150	9%	$1,032,543 CDBG
Increase Home Ownership	Provide funding for down payment and closing costs	0	1	0	N/A	$17,630 ADDI
Maintain/Improve Existing Housing Quality	Provide funding for repair of owner occupied single family housing	270	249	2,000	72%	$1,272,220 CDBG $1,092,727 HOME
	Provide funding for minor home repairs	695	749	N/A	N/A	$674,913 CDBG
Support CBDO's	Provide capacity building assistance to neighborhood organizations in targeted areas	23	19	23	83%	$3,407,971 CDBG
Build or enhance public infrastructure/facilities	Provide funding for building or enhancing public facilities and infrastructure	N/A	4	N/A		$511,974 CDBG
Aid Public Service Activities	Assist organizations providing senior, youth, child care, health care and other public supportive services	261,821[3]	295,478[3]	420,840	70%	$4,045,375 CDBG

Goal	Methodology	2010 Goal	2010 Results	5 Year Goal	Percent of 5 Year Goals Completed	Amount/ Formula Grant Expended[1]
Provide assistance/incentives to retain/attract businesses to the City	Provide loans/ grants to businesses and provide funding for facade/public improvements in commercial districts	300	198	1,500	13%	$2,123,294 CDBG
Make Substantial Progress Toward Eliminating Chronic Homelessness	Provide full range of services to minimize homeless/at-risk homeless persons	10,400[4]	23,553[4]	52,500	45%	$_____ ESG $628,370 CDBG
Maintain/Improve Services for HIV/AIDS Persons	Provide full range of services for HIV/AIDS persons/families	1,937	2,143	2,965	222.5%	$1,110,046 HOPWA

[1]The amount of grant funds expended reflects current entitlement and prior year funds spent in 2010.
[2]This number reflects total affordable units in projects assisted by CDA.
[3]This number reflects duplicated people and two projects benefiting low/moderate income persons on area basis.
[4]This number reflects duplicated people.

GENERAL QUESTIONS

1. *Describe the geographic areas of the jurisdiction (including areas of low income families and/or racial/minority concentration) in which assistance will be directed during the next year. Where appropriate, the jurisdiction should estimate the percentage of funds the jurisdiction plans to dedicate to target areas.*

2. *Describe the basis for allocating investments geographically within the jurisdiction (or within the EMSA for HOPWA) (91.215(a)(1)) during the next year and the rationale for assigning the priorities.*

3. *Describe actions that will take place during the next year to address obstacles to meeting underserved needs.*

4. *Identify the federal, state, and local resources expected to be made available to address the needs identified in the plan. Federal resources should include Section 8 funds made available to the jurisdiction, Low-Income Housing Tax Credits, and competitive McKinney-Vento Homeless Assistance Act funds expected to be available to address priority needs and specific objectives identified in the strategic plan.*

GEOGRAPHIC AREAS OF THE JURSIDICTION

The boundaries of the City of St. Louis encompass some 61.4 square miles and were fixed at their current limits by a vote of residents in 1876. The City of St. Louis is an independent city and is one of only a handful of cities in the country that function as both cities and counties -- thus, it has not been possible for the City of St. Louis to add to its land area and tax base by annexing adjacent unincorporated land area. From 1950 to 2010, the City lost more than 500,000 people -- over 62% of its population -- as the number of people living in the City dropped from 850,000 at the 1950 census to less than 320,000 in 2010. Nearly two-thirds of the City's population have incomes that meet the definition of low and moderate income.

GEOGRAPHIC BASIS FOR ALLOCATION OF INVESTMENTS

In the 2012 program year services provided through the CDBG program will be concentrated primarily in low/moderate income neighborhoods, although a limited amount of service may be provided to other areas exhibiting signs of slums or blight. Most areas of the City are low and moderate income areas per HUD definitions. (The Low/Moderate Income Percentages map on page 24 shows these low-moderate income areas of the City based on 2000 census figures.) Still other programs operate on a citywide basis but serve only low and moderate income clients or are funded with a combination of CPD and non-CPD funds. HOME funds must of course be utilized for housing activities benefiting very low-income and low-income families and are targeted accordingly.

Activities and projects carried out with the CDBG and HOME 2012 funding fall within eight general categories: Public Services, Section 108 Loan Repayments, Community Based Development Organizations, Home Repair, Housing, Historic Preservation, Economic Development, and Planning/Administration. Collectively, these activities encompass the total CDBG and HOME programs anticipated to be undertaken in the program year. Descriptions of

these activities, along with Emergency Shelter Grant and Housing Opportunities For Persons With AIDS activities, are provided in the Project Worksheet section.

The following pages utilize maps to show proposed CDBG, HOME, ESG and HOPWA funded projects and locations for 2012 as follows:

- City of St. Louis Map of Low/Moderate Income Areas
- CDBG-Funded Public Services
- CDBG-Funded Community Based Development Organizations
- CDBG-Funded Community Education Centers
- CDBG-Funded Expanded Recreation Centers
- ESG-Funded Emergency, Transitional & Permanent Housing Facilities
- HOPWA-Funded Facilities

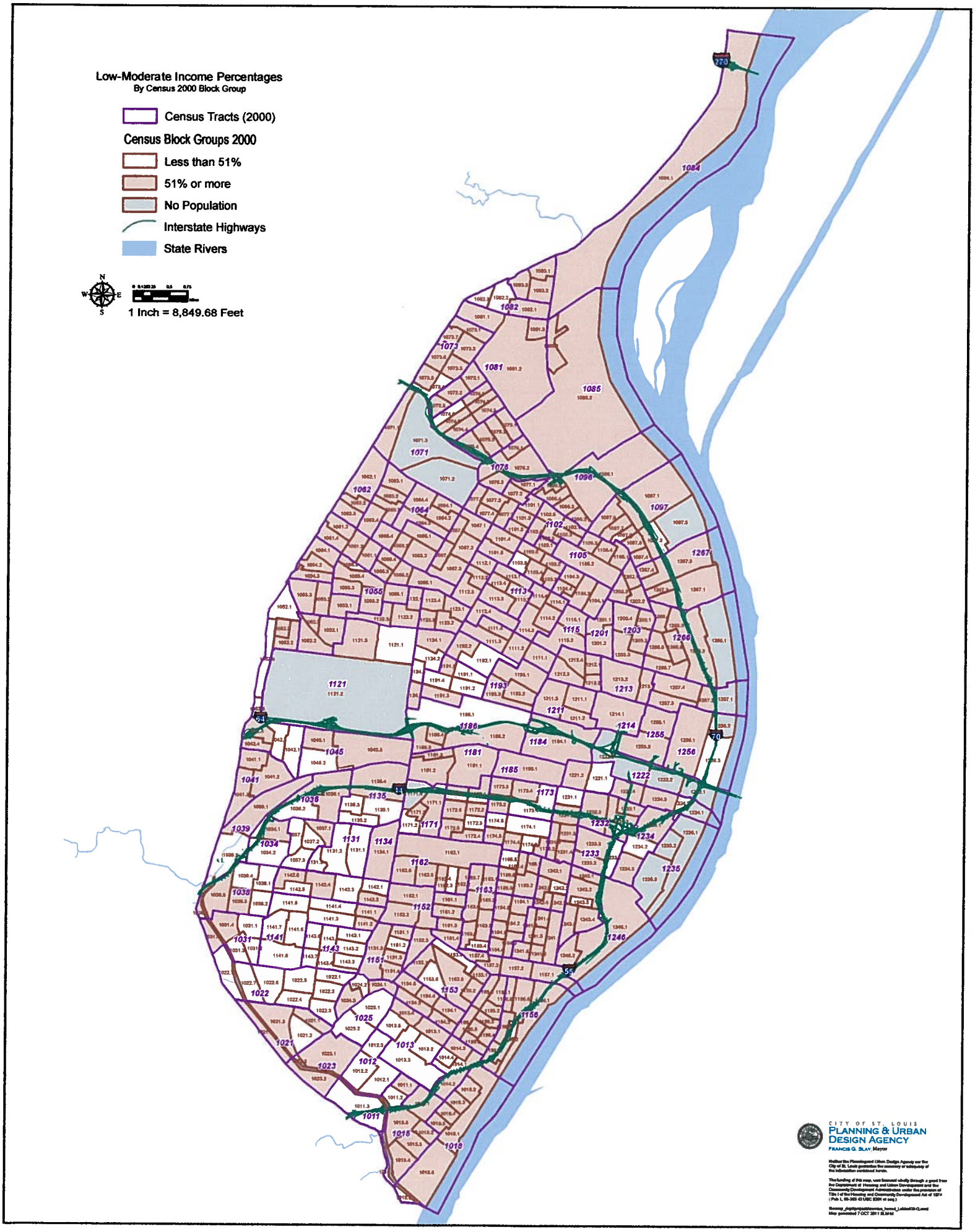
MEETING UNDERSERVED NEEDS

The City is at a serious disadvantage in removing or eliminating obstacles to meeting underserved needs due to the reduced amount of CDBG funds available to the City and the City's high percentage of people in poverty and low- and moderate-income people. With the serious decline in CDBG funding, it has become more and more difficult to fund those programs that have provided much needed services over the years. Sufficient funding is not available to fund new activities addressing underserved needs. The City continues to urge its non-profit organizations to secure other sources of funds and can provide assistance to these agencies in grant writing and fund raising efforts.

FEDERAL, STATE, AND LOCAL RESOURCES AVAILABLE

An estimated total of $67,570,000 in other federal, state, and local resources will help address the needs identified in the plan. The table below illustrates the distribution of funds among the City of St. Louis's four entitlement grants. The project worksheets contained within this plan include the allocation of these additional resources among the specific projects and activities.

RESOURCES AVAILABLE	PROGRAM YEAR 2012 CDBG/HOME	ESG	HOPWA	TOTAL
Other HUD Funds	$49,700,000	$12,000,000	$0	$30,000,000
Additional Federal Funds	$7,000,000		$0	$70,000
State of Missouri Funds	$6,000,000		$0	$2,500,000
City of St. Louis Funds	$4,550,000		$0	$3,000,000
Local and Private Funds	$10,400,000		$0	$2,000,000
Other Unspecified	$29,390,164		$0	$30,000,000
TOTAL	**$107,040,164**	**$12,000,000**	**$0**	**$67,570,000**

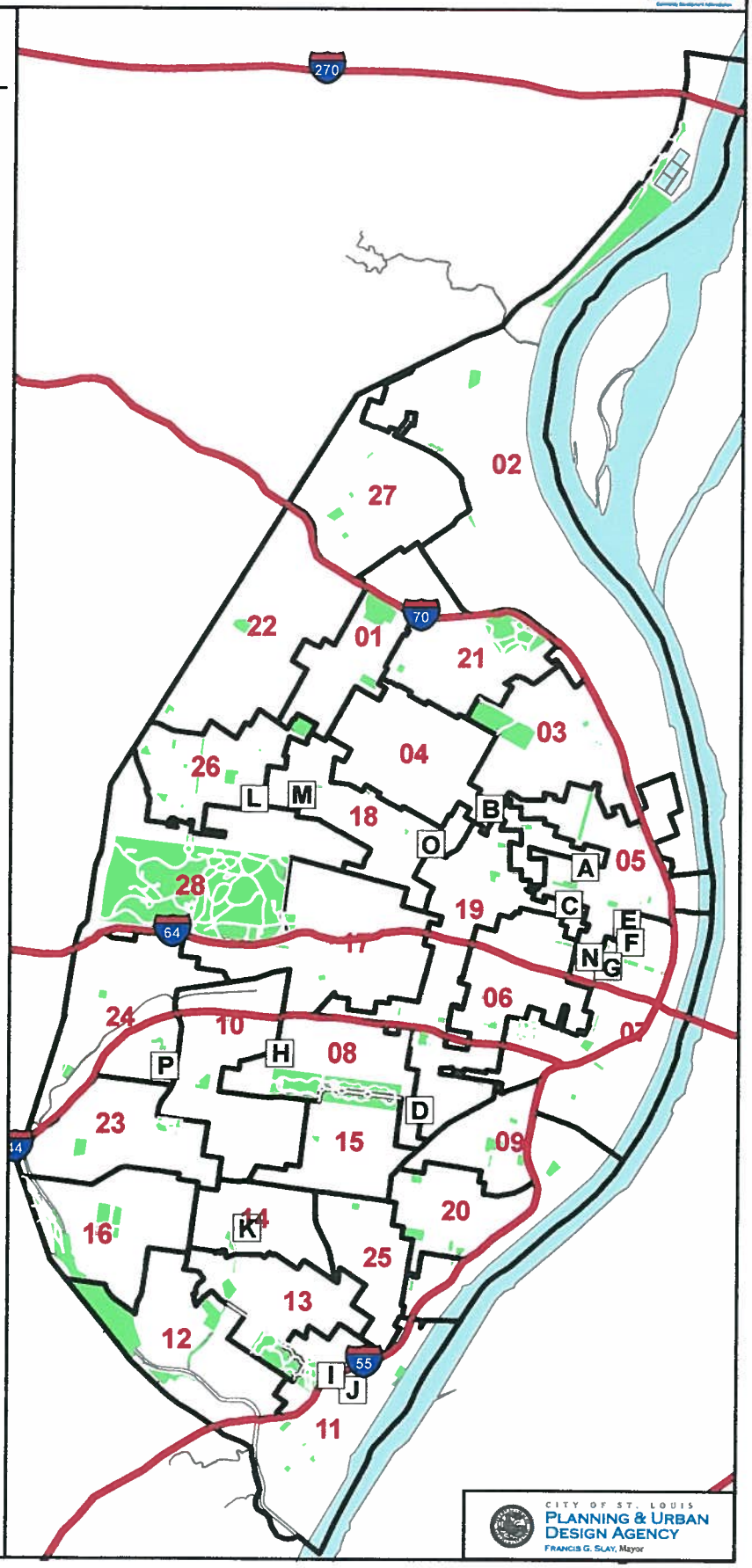

Low-Moderate Income Percentages
By Census 2000 Block Group
Census Tracts (2000)
Census Block Groups 2000
Less than 51%
51% or more
No Population
Interstate Highways
State Rivers
1 Inch = 8,849.68 Feet
CITY OF ST. LOUIS
PLANNING & URBAN DESIGN AGENCY
FRANCIS G. SLAY, Mayor

2012 City of St. Louis
CDBG Public Service Projects

Legend
Public Service Programs

Ward		Organizations
05	A	Elmer Hammond Day Care Center 1920 Cass
05	B	Community Health-in-Partnership Services 2431 N Grand
06	C	Youth & Family Services 2012 Dr. Martin Luther King
05	D	St. Elizabeth Adult Day Care Program 3401 Arsenal
06	E	Housing Resource Center* 800 N. Tucker
07	F	SLDC Maintenance Program* 1015 Locust
07	G	Problem Properties Team* 1200 Market
07	H	Operation Brightside - Clean-Up* 4646 Shenandoah
08	I	FCHC - Adult Medicine 401 Holly Hills
11	J	Carondelet Family Literacy Program 6407 Michigan
11	K	Bevo Senior Services 4705 Ridgewood
18	L	Better Family Life Urban Rhythms 724 N. Union
18	M	Union Sarah Senior Center 848 N. Kingshighway
18	N	Elderly Services* 1520 Market
19	O	Metro St. Louis Equal Housing Opportunity Council 1027 S. Vandeventer
24	P	Hi-Pointe Center 6020 Southwest

* *Organization provides service citywide*



Locations reflect main offices. Service areas may include multiple wards or operate city-wide.

N W E S

0 5,500 11,000 16,500
Feet

2012 City of St. Louis
CDBG - Community Based Development Organization

Legend

Organization

A 26th Ward Revitalization
To Be Determined

B Carondelet Community Betterment Federation, Inc
6408 Michigan

C Central West End - Midtown Community Development Corp
4512 Manchester

D DeSales Community Housing Corporation
2759 Russell

E Dutchtown South Community Corporation
4204 Virginia

F Grand Oak Hill Community Corporation
4168 Juniata

G Hamiliton Heights Neighborhood Organization, Inc
5500 Natural Bridge

H Greater Ville Preservation Commission
4140 Dr. Martin Luther King Drive

I The Acts Partnership
4202 Natural Bridge

J Old North St. Louis Restoration Group
2700 14th St.

K Riverview-West Florissant Housing Corporation
6085 West Florissant

L Skinker DeBalivere Community Council
6008 Kingsbury

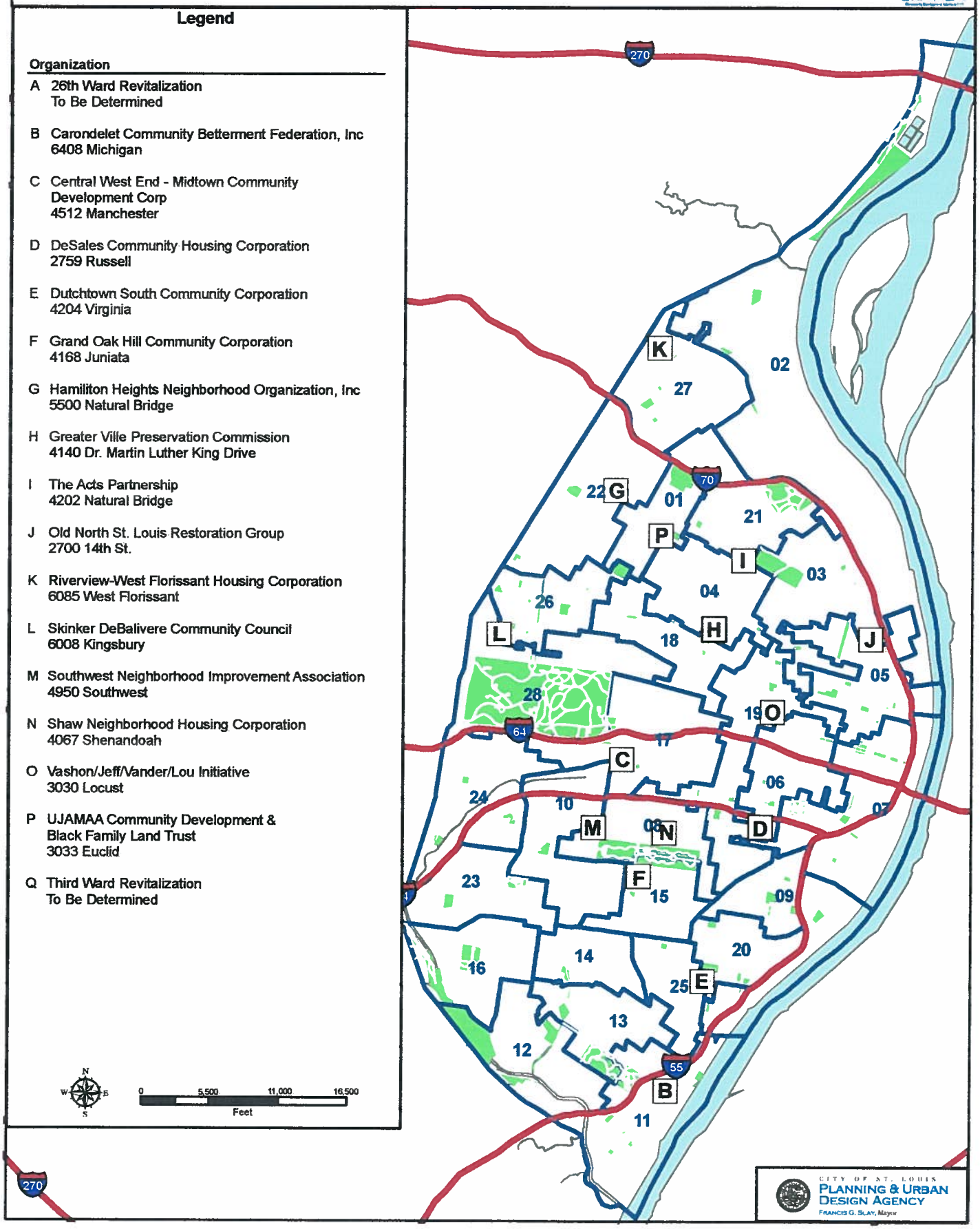
M Southwest Neighborhood Improvement Association
4950 Southwest

N Shaw Neighborhood Housing Corporation
4067 Shenandoah

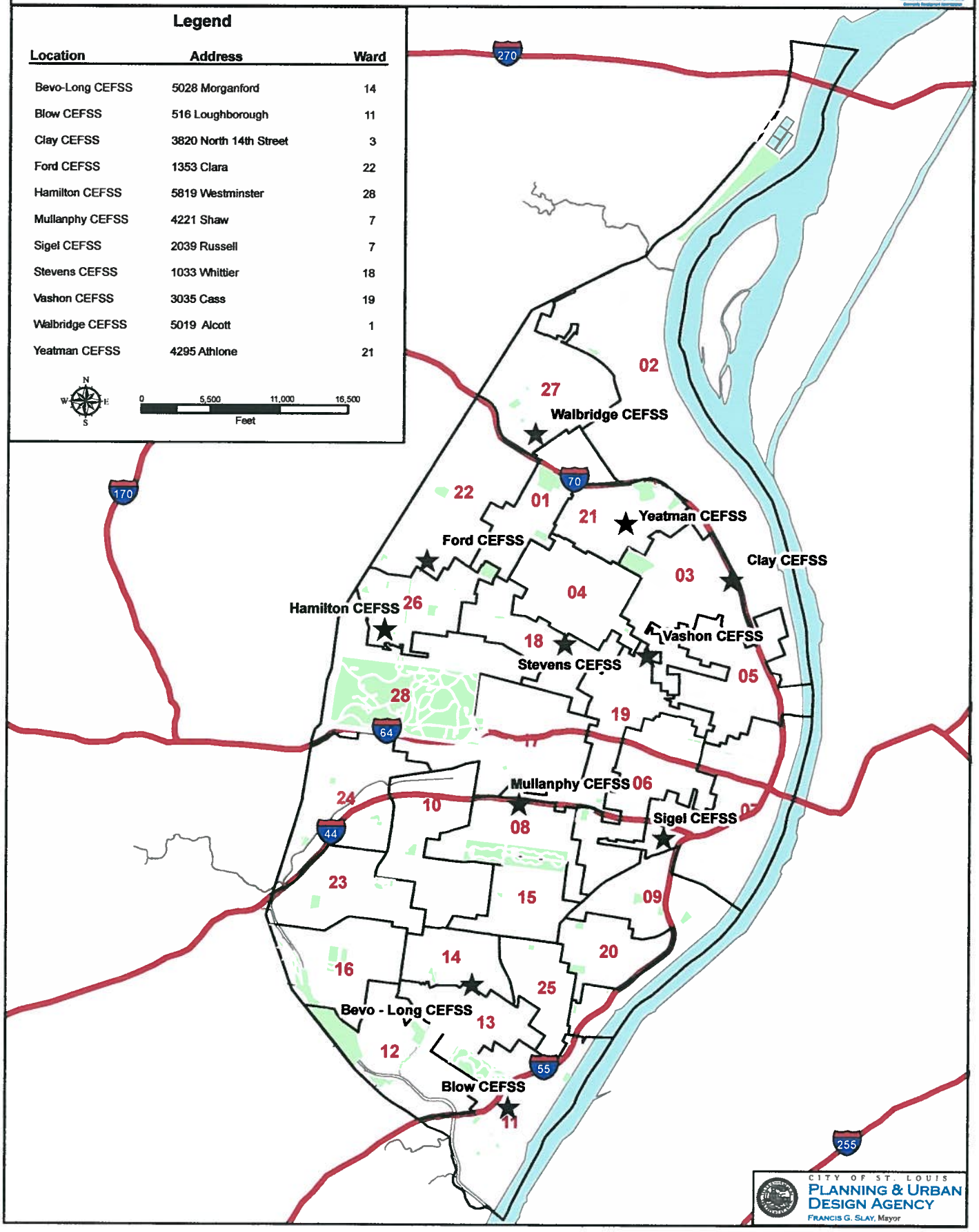
O Vashon/Jeff/Vander/Lou Initiative
3030 Locust

P UJAMAA Community Development & Black Family Land Trust
3033 Euclid

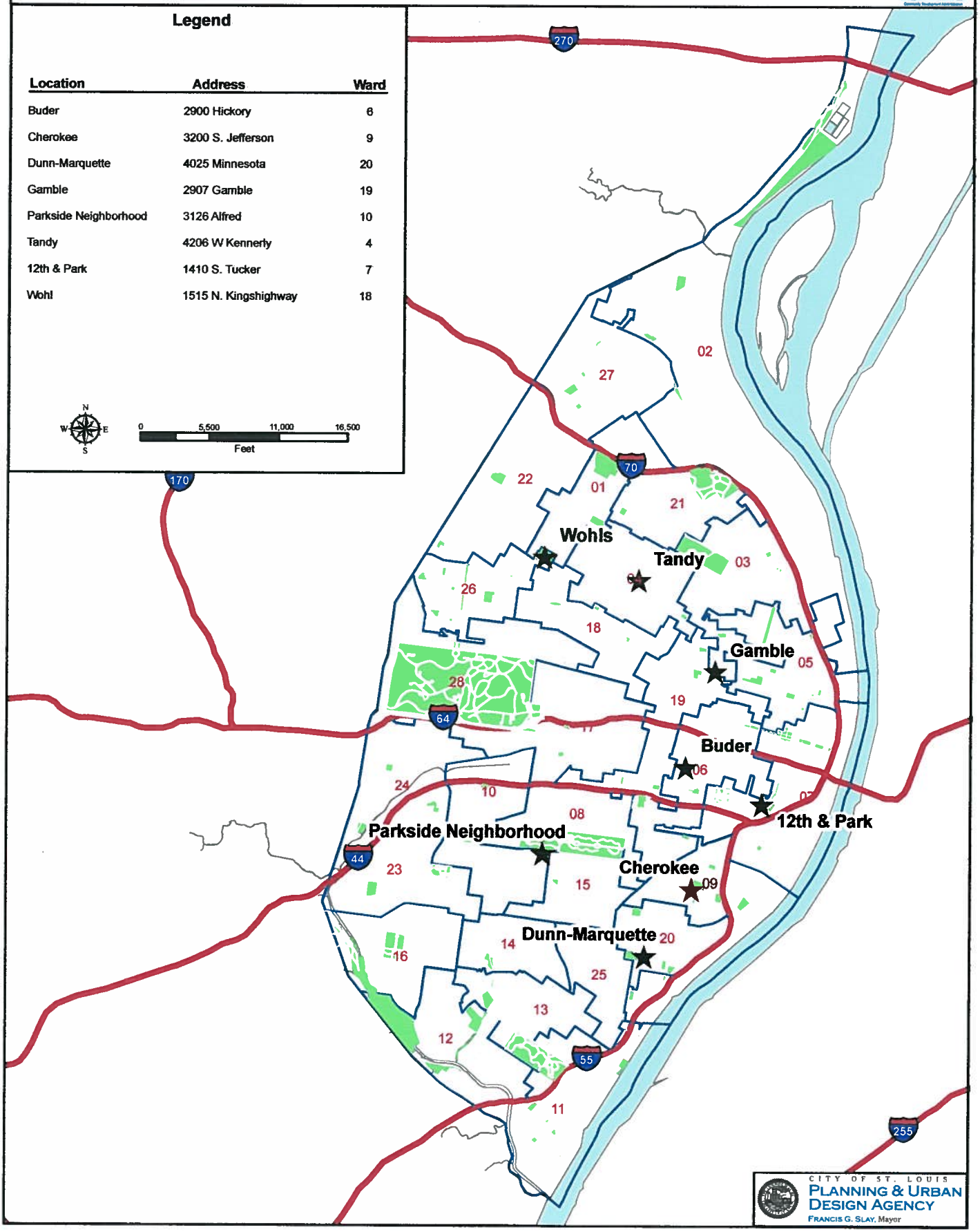
Q Third Ward Revitalization
To Be Determined



2012 City of St. Louis
CDBG - Community Education Full Service Schools (CEFSS)



2012 City of St. Louis
CDBG - Expanded Recreation Centers



2012 City of St. Louis
ESG Projects

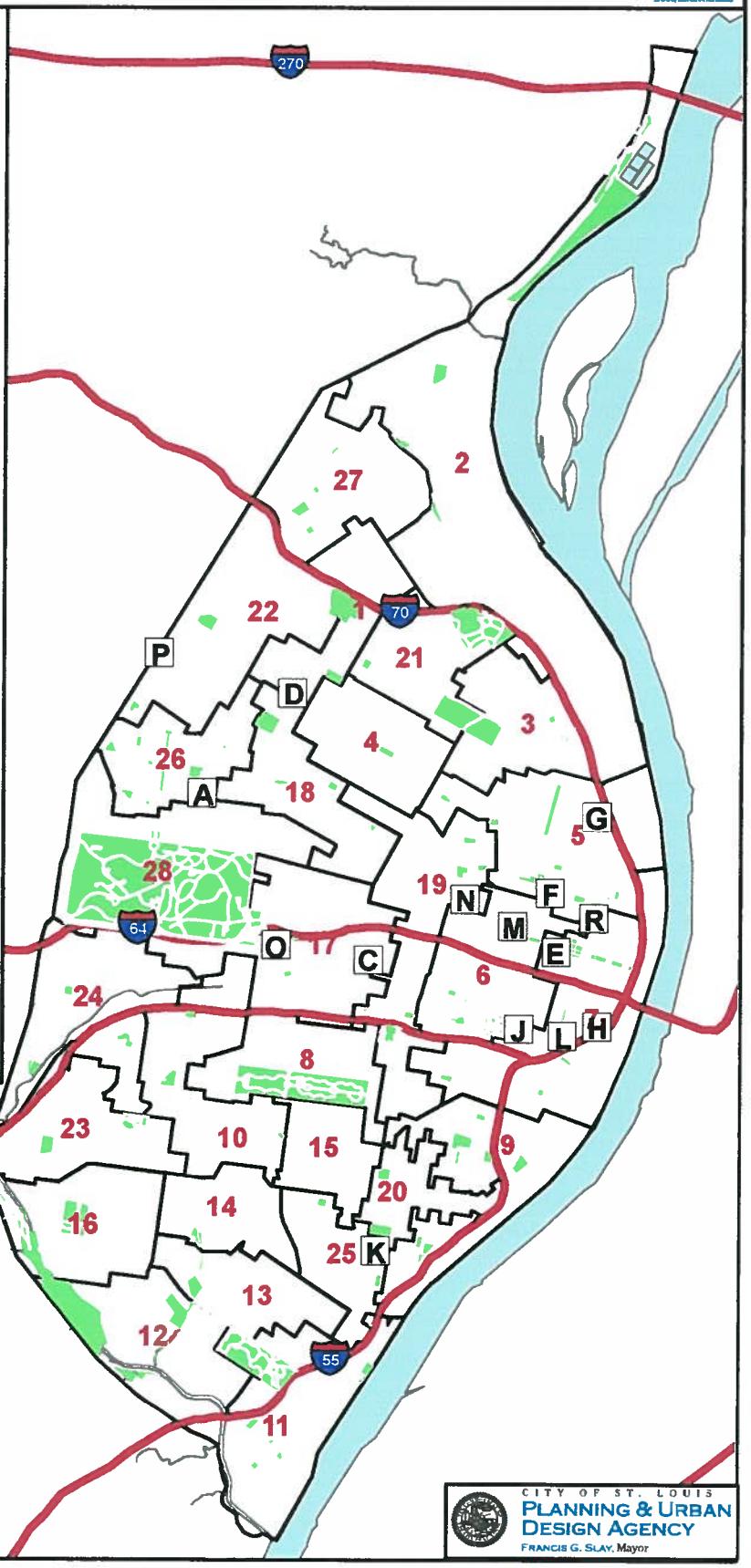
Legend

Agency	Address
A Bridgeway Counseling Services	5351 Delmar
B Catholic Charities Housing Resource Center	800 North Tucker
C Community Alternatives	3738 Chouteau
D Covenant House	2727 North Kingshighway
E Department of Human Services Admin	1520 Market
F Gateway Homeless Services	1000 North 19th Street
G Haven of Grace	1225 Warren
H Humanitri	1120 South 6th Street
I Lydia's House*	See note below
J Municipal Information Systems, Inc.	1445 South 18th Street
K Our Lady's Inn	4223 South Compton
L Peter & Paul Community Services	1025 Park
M Redevelopment Opportunities for Women	2229 Pine
N Salvation Army Harbor Light	3010 Washington
O Shalom House	1040 South Taylor
P St. Louis Transitional Hope House	1611 Hodiamont
Q St. Martha's Hall*	See note below
R St. Patrick Center	800 North Tucker
S. The Women's Safe House*	See note below

**St. Martha's Hall and the Women's Safe House are transitional housing for battered women, and locations are confidential*

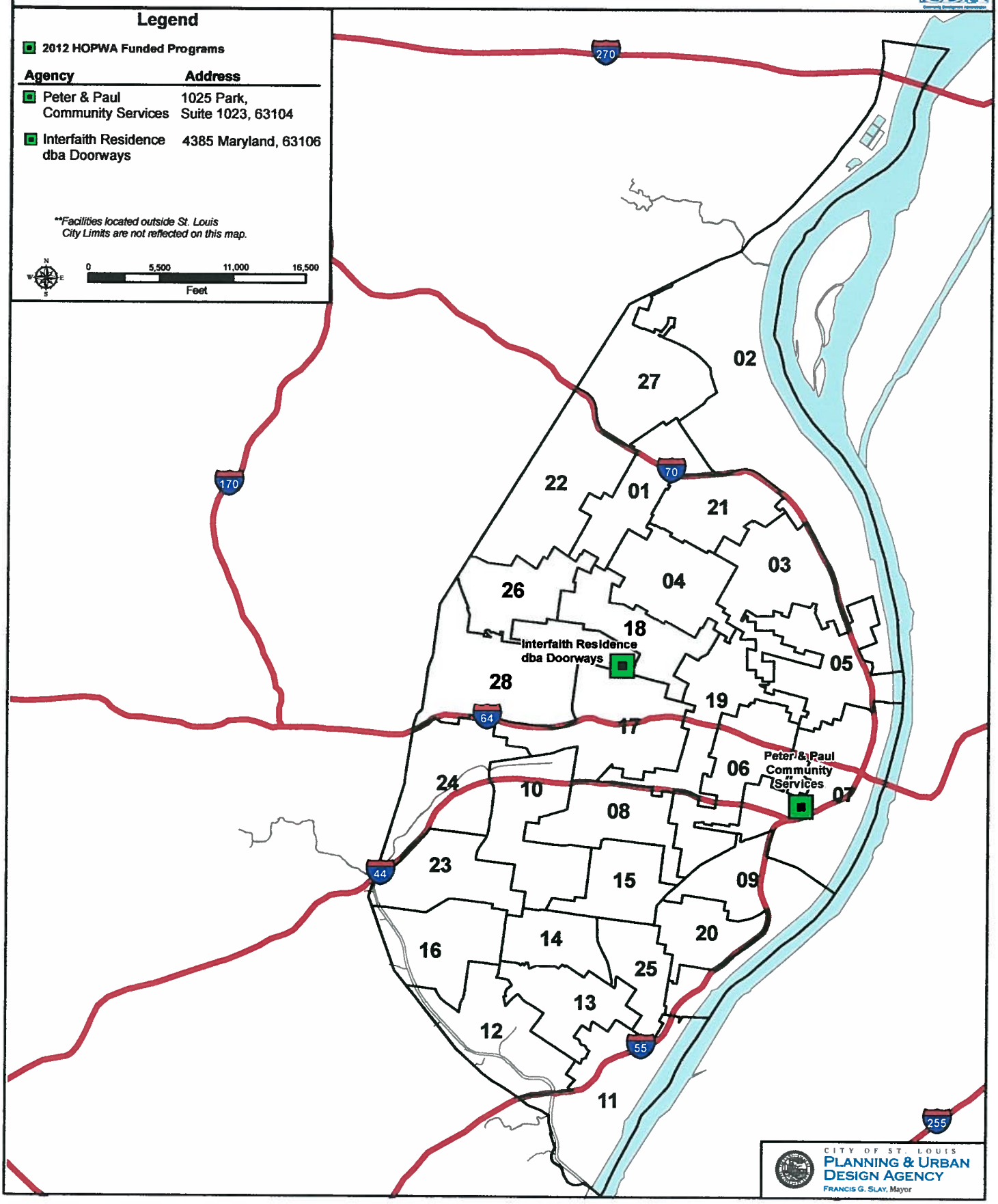
N W E S

0 5,500 11,000 16,500
Feet



CITY OF ST. LOUIS
PLANNING & URBAN DESIGN AGENCY
FRANCIS G. SLAY, Mayor

2012 City of St. Louis
HOPWA - Funded Facilities



MANAGING THE PROCESS

1. *Identify the lead agency, entity, and agencies responsible for administering programs covered by the consolidated plan.*

2. *Identify the significant aspects of the process by which the plan was developed, and the agencies, groups, organizations, and others who participated in the process.*

3. *Describe actions that will take place during the next year to enhance coordination between public and private housing, health, and social service agencies.*

AGENCIES ADMINISTERING PROGRAMS

The Community Development Administration (CDA) is the lead agency responsible for managing the consolidated planning effort. CDA is responsible for making sure that the City's Five Year Plan is completed as required, that the Annual Action Plan is submitted each year by November 15, and that the Consolidated Annual Performance and Evaluation Report is submitted to HUD within 90 days following completion of each program year. While the City's Planning and Urban Design Agency works with CDA to develop the Five Year Plan, CDA compiles the Annual Action Plan and the CAPER report. There are approximately 60 agencies charged with the responsibility of implementing the projects identified in the current Action Plan. Other agencies and organizations will administer activities under this plan and are specified in the Consolidated Plan Project Worksheets. They include but are not limited to:

CITY OF ST. LOUIS

Board of Public Service
City Counselor's Office
Community Development Administration
Comptroller's Office
Department of Human Services
Department of Health
Department of Parks, Recreation and Forestry
Department of Public Safety – Building Division
Office of the Disabled
Planning and Urban Design Agency
St. Louis Area Agency on Aging
St. Louis City Court

OTHER PUBLIC ORGANIZATIONS

Human Development Corporation
Local Development Company
St. Louis Board of Education
St. Louis Development Corporation

PRIVATE ORGANIZATIONS AND AGENCIES

Almost Home
Better Family Life, Inc.
Bethany Place
Bevo Area Community Improvement Corp.
Bridgeway Counseling
Carondelet Community Betterment Federation, Inc.
Catholic Charities Housing Resource Center
Central West End - Midtown CDC
Community Health-In-Partnership, Inc.
Community Alternatives
Covenant House of Missouri
DeSales Community Housing Corp.
Dutchtown South Community Corp.
Family Care Health Centers
Gateway 180
Grace and Peace Fellowship
Grand Oak Hill Community Corp.
Greater Ville Preservation Commission
Hamilton Heights Neigh. Organization, Inc.
Haven of Grace
Hi-Pointe Center, Inc.
Home Services, Inc.
Humanitri
Interfaith Residence dba Doorways
Lydia's House
Metropolitan St. Louis Equal Housing Opportunity Council
Municipal Information Systems, Inc.
Our Lady's Inn
Old North St. Louis Restoration Group
Peter and Paul Community Services
Redevelopment Opportunities for Women
Riverview-West Florissant Housing Corp.
Salvation Army Harbor Light
Shalom House
Shaw Neighborhood Housing Corp.
Skinker-DeBaliviere Community Council
Southwest Neighborhood Improvement Assoc.
St. Elizabeth Adult Day Care Center
St. Louis Transitional Hope House
St. Martha's Hall
St. Patrick Center
The Acts Partnership
The Youth & Family Center
UJAMMA Community Development Corporation and the Black Family Land Trust
Union Sarah Senior Citizen Center, Inc.
Vashon-Jeff Vander Lou Initiative
Vaughn Tenant Association
Women's Safe House

PLAN DEVELOPMENT PROCESS

The Planning and Urban Design Agency (PDA) is the entity responsible for the formulation and production of the 2010-2014 Five Year Consolidated Plan Strategy. In developing the Consolidated Plan, PDA met with a variety of City officials, service providers, and advocacy groups. Detailed information regarding this process is set forth in Appendix B of the Five Year Plan.

2012 represents the third year of activities described in the Consolidated Plan. Each year's activity will be described as an Action Plan that provides a listing of projects and programs recommended for funding under that year's funding allocation. Local citizens participating in the planning process identified needs in the following areas that are widespread and serious:

- Neighborhoods that are safe, stable and enjoyable
- Housing that is affordable and in good condition
- Jobs that pay decently, are accessible, and for which training is available
- Constructive activities for young people and seniors
- Access to information about current programs and activities
- Opportunities to define and shape a better life for self, family and neighborhood

To address these goals, the City of St. Louis proposes over 60 projects mostly concentrated in lower income areas within neighborhoods that have important physical and social resources to draw upon.

The Consolidated Plan is intended to:

- promote citizen participation and develop local priority needs and objectives by providing comprehensive information on the needs of the community; and
- promote the development of an Action Plan that provides a basis for assessing performance; and
- encourage consultation with public and private agencies to identify shared needs and solutions to community issues and problems.

AGENCY COORDINATION ENHANCEMENT

The City of St. Louis's proposed Year 2012 Action Plan describes recommended funding levels to address housing, social service, economic development, homeless, and planning and administration needs for these four CDP formula grant programs. The Community Development Administration serves as the lead agency in formulating the Action Plan and applying to the Department of Housing and Urban Development for funding. CDA also administers the CDBG and HOME programs, carrying out some activities directly but in most cases contracting with other entities for the provision of services. Administration of the Emergency Shelter Grant program is carried out by the City's Department of Human Services, while the Housing Opportunities for Persons with AIDS Program is administered by another City Agency, the Department of Health and Hospitals. The Action Plan was drafted in conjunction with the aforementioned City departments, other agencies carrying out 2011 activities, and elected officials. Efforts will continue in the upcoming year to coordinate efforts among the participating partners.

CITIZEN PARTICIPATION

1. *Provide a summary of the citizen participation process.*

2. *Provide a summary of citizen comments or views on the plan.*

3. *Provide a summary of efforts made to broaden public participation in the development of the consolidated plan, including outreach to minorities and non-English speaking persons, as well as persons with disabilities.*

4. *Provide a written explanation of comments not accepted and the reasons why these comments were not accepted.*

CITIZEN PARTICIPATION PLAN PROCESS

The application process starts with Citizen Participation. Citizens and local service providers are asked to discuss their views on how the various grant program funds are to address the three common goals that are set by statutes governing the CDBG program.

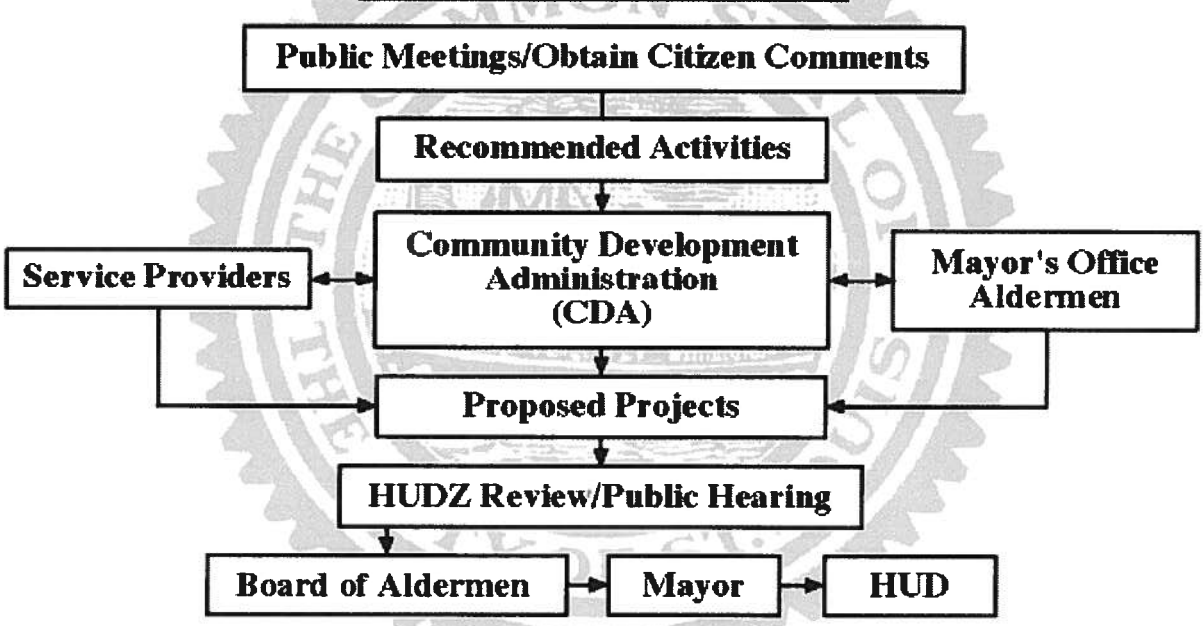
- Provide Decent Housing
- Provide a Suitable Living Environment
- Expand Economic Opportunities

These goals are met through a collaborative process. Three public meetings are held to obtain citizen views, and interviews with various service providers are conducted to obtain information and guidance on the utilization of existing and possible future programs.

Citizen comments and suggestions are incorporated into a proposed funding allocation. These proposed projects are forwarded to the Board of Aldermen for consideration. Through the Housing, Urban Development and Zoning Committee (HUDZ) hearing, citizens have a further opportunity to express their ideas as to which programs should be funded and in what amounts. Recommendations from the HUDZ committee are then presented to the full Board of Aldermen for approval by ordinance and at a third public meeting.

It is not until that process is completed that the Action Plan is forwarded to the Department of Housing and Urban Development for funding. The following flow chart is a simple representation of this process.

CITIZEN PROCESS



SUMMARY OF CITIZEN COMMENTS

The Citizen Participation process with respect to the 2012 Annual Action Plan was initiated on August 24, 2011, with the first of three public hearings. Notice of the hearing was posted on the City's website at http://stlouis.missouri.org and published in the St. Louis Post Dispatch and St. Louis American newspapers. In addition, notification of the hearings was sent to those agencies currently funded through the CDBG program. Four citizens were in attendance at the hearing. One attendee spoke at some length about the need to revisit the City's 10-Year Plan to end homelessness. Another discussed the St. Louis Public School's Community Education programs. A third expressed appreciation for CDA's ongoing support. All asked questions about prospects for additional budgets. One expressed support for re-evaluating which activities are supported.

A second hearing was conducted on October 4, 2011 with six citizens in attendance. Most attendees spoke on behalf of continuing funding for Community Education, specifically the Walbridge Community Education Center.

A third and final hearing took place on October 20, 2011, with _____ citizens present.

Copies of the minutes of the public hearings are available for review at the Community Development Administration office.

PUBLIC PARTICIPATION BROADENING EFFORTS

Efforts to broaden citizen participation among minorities, non-English speaking persons, and persons with disabilities are indicated in the draft Citizen Participation Plan currently being reviewed. In addition to having a representative from the Office on the Disabled on call to assist any persons with hearing disabilities attending the hearings for the 2012 Action Plan, the City also has available translators for over 30 different languages for those citizens who do not speak English or can converse more readily in their native language. The City works with Mind's Eye Information Services to see that notices are broadcast over their radio station, which serves persons who are blind or vision impaired. The proposed 2012 Annual Action Plan was also posted on the City's website for comments and questions. Operating agencies funded by CDA in 2011 and anyone who called for information received notice by e-mail. Operating agencies were urged to encourage attendance by residents in their service areas.

COMMENTS NOT ACCEPTED

There were no instances in the hearings where comments were not accepted. Every person wishing to speak at the public hearings was allowed to do so. Further, no written comments were submitted to the Community Development Administration.

INSTITUTIONAL STRUCTURE

1. Describe actions that will take place during the next year to develop institutional structure.

INSTITUTIONAL STRUCTURE DEVELOPMENT

The City's primary development agencies - the Community Development Administration (CDA), the Planning and Urban Design Agency, and the St. Louis Development Corporation (SLDC) - work together to plan and implement housing and economic development activities within the City of St. Louis. The Community Development Administration is responsible for the administration of federal funds for housing, community and economic development programs that strengthen the City of St. Louis and its neighborhoods. The Planning and Urban Design Agency was created in the summer of 1999 upon passage of Ordinance 64687 to focus on planning for the future of the City of St. Louis. The Agency provides staff support for the Planning Commission and is comprised of four divisions: Planning and Urban Design, Cultural Resources, Research, and Graphics/Computer Mapping. The St. Louis Development Corporation is an umbrella, not-for-profit corporation organized under Chapter 355 of the Missouri State Code with the mission of fostering economic development and growth in the City by increasing job and business opportunities and expansion of the City's tax base. Together, these agencies will continue to work together, along with other key City Departments, in the upcoming program year to effectively plan and carry out housing, economic development, and other community development activities essential to the continued development of the City.

MONITORING

1. *Describe actions that will take place during the next year to monitor its housing and community development projects and ensure long-term compliance with program requirements and comprehensive planning requirements.*

RECIPIENT MONITORING

The City of St. Louis strives to ensure that each Department meets the financial and managerial expectations of its citizens through the implementation of regular Internal Audit Reviews. As a City Department, the St. Louis Community Development Administration (CDA) has participated in several Business Review and Contract Process audit reviews over the past five years. In addition to these efforts, each year the City undergoes a rigorous review of its policies and procedures by outside auditors as part of the A-133 audit process. This process helps to ensure that the City complies in all material aspects with laws, regulations, contracts, and grants applicable to federal programs.

SUBRECIPIENT MONITORING

CDBG and HOME Programmatic/Contract Monitoring Policies and Procedures:

The St. Louis Community Development Administration primarily utilizes its monitoring staff to review programs and activities for compliance with CDBG rules and regulations. Under the 2012 Action Plan, there are approximately 40 operating agencies that will have agreements to carry out specific activities outlined in the Action Plan. During each program year CDA's monitoring section conducts at least one major programmatic visit to each of the contracting agencies. These reviews are conducted specifically to determine if agencies are meeting the objectives and criteria as set forth in their contracts and work programs. The programmatic reviews also target the organization's compliance with federal regulations as well as state and local law.

In order to assure consistency and fairness in monitoring, monitors conduct their reviews utilizing a standardized checklist. Monitors maintain an ongoing relationship with their organizations throughout the year. This relationship involves routine interaction, as well as more "hands on" communication and monitoring, depending on the experience and ability of each particular organization.

Residential Development staff persons are responsible for monitoring functions associated with HOME-funded activities. Staff persons conduct on-site inspections of HOME assisted rental housing units to determine compliance with the property standards of 92.251, as well as verifying the information submitted by owners in accordance with the requirements of 92.252.

The afore-described monitoring efforts should ensure long-term compliance with program requirements and comprehensive planning requirements.

CDBG and HOME Fiscal Monitoring Policies:

CDA also contracts with the City of St. Louis Comptroller's Office to conduct fiscal reviews of each funded organization. These reviews are carried out by the Internal Audit Section and are intended to ensure that recipients of CDBG and HOME funds are using funds efficiently and in compliance with applicable regulations. Fiscal monitoring addresses the following types of compliance requirements: internal controls related to activities allowed or unallowed; allowable costs/cost principles; eligibility; and matching, level of effort, earmarking and reporting. The Internal Audit Section also reviews OMB Circular A-133 reports from CDA subrecipients required to have an independent audit completed, to ensure that the reports meet all A-133 compliance requirements. Subrecipients not required to have an independent A-133 audit must provide a written statement to the Internal Audit Section that they did not meet or exceed the threshold of federal expenditures in the prior year that would require them to have an independent A-133 audit. In addition, the Federal Grants Section of the Comptroller's Office provides fiscal support for grant funded activities focusing primarily on financial operations and expenditure eligibility.

CDBG and HOME Labor Standards Monitoring:

Labor standards monitoring of most housing and commercial development projects funded by CDA or its subrecipients that trigger compliance with the Davis Bacon Act is performed by a Community Development Administration Program Monitor. Labor standards monitoring for the St. Louis Development Corporation's Neighborhood Commercial District Improvement and Incentives program is handled by SLDC's own monitor. Labor standards monitoring for those housing projects where the St. Louis Housing Authority is a participant is handled by the St. Louis Housing Authority. The City's Board of Public Service handles the necessary labor standards monitoring for projects carried out under the contract with them. Wage determinations, bid specifications, contracts, certified payrolls and all other required documents are kept on file in CDA's office or by another agency's monitor to verify that the projects are being monitored for compliance.

CDBG and HOME Section 3 Monitoring:

CDA certifies businesses and residents that meet Section 3 classification requirements. A list of these businesses and residents is provided to all developers and general contractors prior to the start of construction of any project required to comply with Section 3 regulations. Developers and contractors are also required to submit a Section 3 Plan to the CDA Section 3 monitor for review and approval prior to the start of construction. Developers and contractors submit quarterly reports indicating number of Section 3 business and resident hires.

HOPWA Fiscal Monitoring

The Department of Health retains the services of the Internal Audit Section of the City of St. Louis Comptroller's Office to perform fiscal monitoring of subcontracts issued by the Department of Health. During the monitoring process, auditors (using OMB Circular A-133 as a guide) test up to three months of fiscal reporting, and examine fiscal records, time logs, payroll records, acquisition and purchasing, accounting practices, and allowable costs. Fiscal monitoring visits occur once during each contract year for each subcontractor. Irregularities are reported in writing, along with recommendations for correction to the Department of Health. Corrective recommendations from the audit team are always adopted by the Department of Health and meetings with the subcontractor take place to develop plans for correcting the irregularities. In extreme cases, this could result in a subcontractor required to return funds to the Department of Health or the termination of a contract.

The Department of Health requires annual A-133 Audits or its equivalent from all subcontractors receiving over $500,000 in federal funds. The Grants Administrator retains copies of A-133 Audit summary reports. The Internal Audit Section of the City of St. Louis Comptroller's Office and the Department of Health review the audits. The most recent audits from all subcontractors must be reviewed by the Department of Health's fiscal section before any agency receives a Department of Health contract. All contractors (100%) comply with audit requirements in OMB Circular A-133.

HOPWA Program Monitoring

In addition to fiscal audits performed by the City Comptroller's Office, the Contract Compliance Officer conducts monitoring site visits for each subcontractor during the contract year to review program deliverables, instruct providers on reporting requirements, assess training and technical assistance needs, and make recommendations for programmatic improvement. A Contract Compliance Policy is included as an attachment in each contract. When an issue is identified, the Grants Administrator negotiates a corrective action plan with the contractor. A written action plan may be required. Unresolved issues are addressed by the Grants Administrator, Bureau Chief and ultimately the Commissioner of Health, as needed. Subcontractors are notified that failure to correct compliance issues will result in a funding reduction of one percent from the administrative line item for each unresolved occurrence. Recurring compliance issues may result in a termination of the subcontract.

The Contract Compliance Officer also performs desk audits on the monthly provider invoices to monitor deliverables set within the contract and scope of work.

The Department of Health utilizes a programmatic monitoring tool for each service category and provider. The tool describes the purpose of the monitoring visits and data elements to be monitored and includes a checklist of relevant contract responsibilities and deliverables. Key areas of the site visit tool include: program-wide elements, individual category specific elements (i.e., TBRA, STRMU, Facility Based Housing, Supportive Services, Housing Information, etc), financial systems and controls, audits, procurement, property and equipment, personnel policies and procedures, client chart review, program highlights and challenges, progress towards

contract deliverables, and suggestions for program improvement. The monitoring tool identifies section strengths, findings and/or concerns. Site visit results are reported to the provider in writing. Providers are required to respond to findings within 30 days and submit a time-phased corrective action plan.

LEAD-BASED PAINT

1. *Describe the actions that will take place during the next year to evaluate and reduce the number of housing units containing lead-based paint hazards in order to increase the inventory of lead-safe housing available to extremely low-income, low-income, and moderate-income families, and how the plan for the reduction of lead-based hazards is related to the extent of lead poisoning and hazards.*

LEAD-BASED PAINT HAZARD ABATEMENT

The City received a competitive Lead Hazard Reduction Demonstration grant from the HUD Office of Healthy Homes and Lead Hazard Control in September of 2011, with a projected start date at the beginning of 2012. Funding from this grant will allow the City to continue implementation of Mayor Slay's *Comprehensive Action Plan to Eradicate Lead Poisoning.*

Under this grant, the City will remediate lead in a minimum of 333 housing units. Twenty-five persons will betrained and licensed as lead workers, and 100 individuals will receive lead safe work practices training. The Community Development Administration will monitor and oversee grant activities, conduct intakes and process applications. The Health Department will screen 1,080 children and reach 3,600 persons through 240 outreach and education sessions in an effort to further decrease rates of lead poisoning. The Building Division will conduct a total of 650 risk assessments and lead inspections in order to determine the presence of lead hazards in residential housing units. In addition, they will perform project design and scope of work development, temporary relocation, job site monitoring, clearance testing, and enforcement. They will also provide remediation services through their in-house detox crews.

The plan focuses on preventing lead exposure through proactive detection, environmental hazard control, enforcement and education. The owners of any housing units in which hazards are detected are offered compliance assistance from the various HUD grants as well as from the Building Division's Lead Remediation Fund. In the event that property owners do not address the lead hazards independent of the City's resources, or if they do not accept the offer of compliance assistance, then the property owners are sent to housing court for enforcement.

In addition, the various CDA-funded home repair programs served as an effective primary prevention tool in that each property that is repaired under the comprehensive program receives a lead hazard risk assessment which will result in the reduction of the hazards regardless of whether or not children currently reside in the property. The City's initiatives also focus on repairing rental properties. Therefore, a substantial portion of the grant funds is allocated to remediate lead hazards in housing units occupied by low/moderate income tenants. Those rental units that are deemed to be "lead-safe" are placed on the City's Lead-Safe Housing Registry.