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

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

PRIVATE ORGANIZATIONS AND AGENCIES

Almost Home
Arch City Defenders
Better Family Life, Inc.
Bevo Area Community Improvement Corp.
Carondelet Community Betterment Federation, Inc.
Catholic Charities Housing Resource Center
Community Health-In-Partnership, Inc.
Community Renewal and Development Corp.
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.
North Newstead Association
Our Lady's Inn
Old North St. Louis Restoration Group
Park East Development Corp.
Peter and Paul Community Services
Places for People
Redevelopment Opportunities for Women
Riverview-West Florissant Development 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. Martha's Hall
St. Patrick Center
The Acts Partnership
The Youth & Family Center
Third Ward Housing Corp.
UJAMMA Community Development Corporation and the Black Family Land Trust
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.

2013 represents the fourth 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 62 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 2013 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 2012 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.

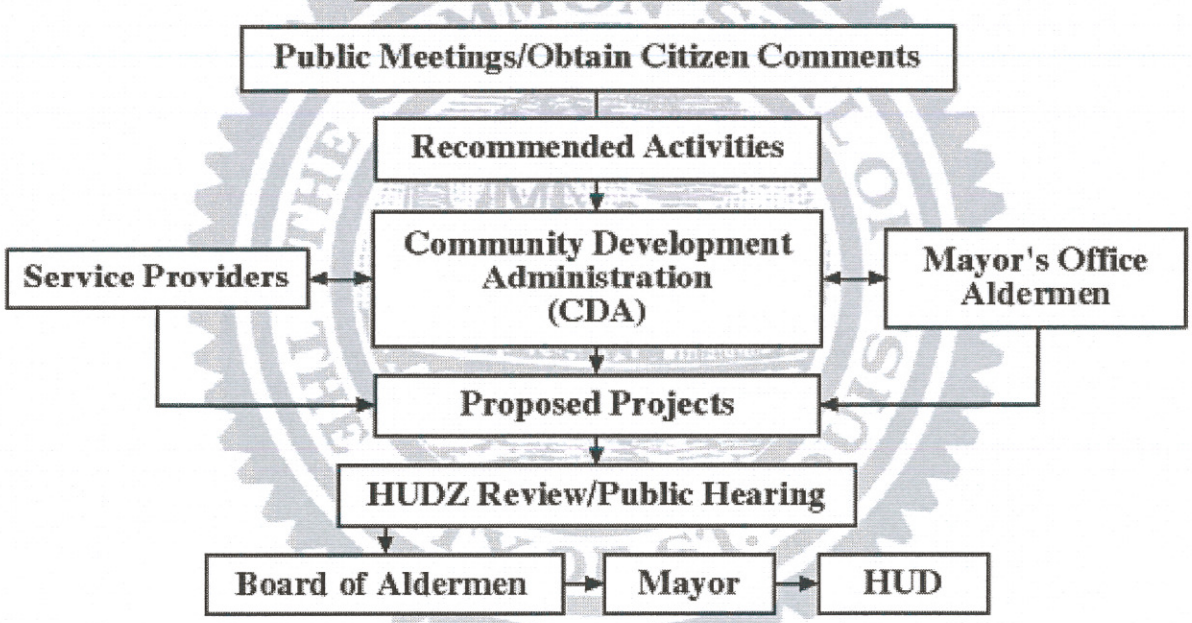
- Provide Decent Housing
- Provide a Suitable Living Environment
- Expand Economic Opportunities

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 2013 Annual Action Plan was initiated on August 30, 2012, with the first of two 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. Fourteen citizens were in attendance at the hearing. Several participants asked questions about the prospects for continued federal funding. All other questions pertained either to the mechanics of the application process or to CDA's fiscal operating procedures.

A second and final hearing was conducted on October 18, 2012, with ____ citizens in attendance.

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 2013 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. CDA also notified the International Institute and asked for their assistance in publicizing the Action Plan process and the hearing. 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 2013 Annual Action Plan was also posted on the City's website for comments and questions. Operating agencies funded by CDA in 2012 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 2013 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 processing payments.

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 Community Development Administration Program Monitors or Housing Analysts. 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 contracts 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 which began March 5, 2012 when HUD released the funds and allowed activities to commence. 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 be trained 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.

In an effort to augment the City's Lead Remediation Fund (LRF), which is funded primarily by building permit fees, the City recently expanded its Housing Conservation District to include most of the City and increased the fee for obtaining an occupancy permit. Sixty percent of the additional revenue generated will be allocated to the LRF. This will assist the City

in sustaining its lead abatement activities in the event that HUD lead remediation funding is decreased or eliminated. Funding will pay for inspections and risk assessments as well as for remediation projects carried out by lead abatement contractors.