

City of St. Louis  
Community Development Administration



Substantial Amendment  
2015 – 2019 Consolidated Plan  
2017 Annual Action Plan

July, 2018

**DRAFT**

## Introduction

In accordance with Title 24 Section 91.505 of the Code of Federal Regulations, the City of St. Louis is submitting this Substantial Amendment to its 2015 - 2019 Consolidated Plan. This document describes program and funding amendments as proposed by the Community Development Administration (CDA). Specifically, CDA proposes the reprogramming of Community Development Block Grant (CDBG) funding allocated and unspent in previous funding years in the amount of **\$829,109.03**. These unused funds and their proposed reallocation are outlined below.

## Regulatory Basis

24 CFR 91.505 requires that the City of St. Louis amend its approved Consolidated Plan whenever it plans to:

1. make a change in its allocation priorities or a change in the method of distribution of funds;
2. carry out an activity, using funds from any program covered by the Consolidated Plan, not previously described in the Annual Action Plan; or
3. change the purpose, scope, location or beneficiaries of an activity.

The regulation further requires that the City identify in its Citizen Participation Plan the criteria used for determining what constitutes a substantial amendment. The City's approved Plan notes that a substantial amendment will be considered to exist when there is:

1. a transfer of funds from an existing line item to a new activity or to a new subrecipient or subgrantee which has not been funded in the current grant year; or
2. a change in excess of 10% for a funded subrecipient or subgrant activity (excludes activities administered by City Departments); or
3. a change in allocation priorities or a change in the method of distribution of funds;
4. an activity type not described in the Annual Action Plan is funded; or
5. a change to the purpose, scope, location, or beneficiaries of an activity; or
6. a change in priorities contained in the ConPlan.

The proposed changes meet at least one of these criteria, and so require a substantial amendment.

## Substantial Amendments

### Identification of Funding Designated for Reprogramming

CDA reviewed present and past expenditures through the City's accounting system and through the use of standard reporting tools on the Department of Housing and Urban Development's Integrated Disbursement and Information System (IDIS). IDIS is a real-time, web-based computer application that provides financial disbursement, tracking, and reporting activities for certain HUD grant programs,

including CDBG. Through this process, CDA has identified previously funded programs/activities with unspent funding. These projects/activities are listed in the table below:

<b>Contract No.</b>	<b>Operating Agency / Organization</b>	<b>Program / Activity Name</b>	<b>Unexpended Balance</b>
17-11-08	22nd Judicial Circuit, Family Court - Juvenile Division	Innovative Concept	1,276.66
17-36-24	Beyond Housing	St. Louis City Down Payment Assistance Program	100,000.00
17-12-84	Carondelet Community Betterment Federation	CCBF Food and Nutritional Services	1,952.15
17-10-63	City Counselor's Office	Problem Property Team Program	8,781.56
17-90-03	City Counselor's Office	Legal Services Support Program	1.43
17-14-20	Covenant House Missouri	Emergency Shelter Program	8,990.82
16-11-85	Department of Parks, Recreation and Forestry	Expanded Recreation Program	1,081.85
17-11-85	Department of Parks, Recreation and Forestry	Expanded Recreation Program	17,044.84
17-10-35	Department of Parks, Recreation and Forestry	Operation Brightside	1,174.57
17-13-10	Family Care Health Centers	Adult Pediatric Medical Service Program	8.18
17-11-32	Flance Early Learning Center	Flance Early Learning Center	2,270.86
16-10-83	Gateway EITX Tax Serv Program	Free Tax Preparation	30,000.00
16-10-38	Gateway Greening	Building Gardens & Better Neighborhoods	0.12
17-10-83	Gateway EITC Community Coalition	Free Tax Preparation	15,000.00

16-11-96	Grace Hill Neighborhood College	Neighborhood Leadership Program	13,198.29
17-11-35	Guardian Angel Settlement	Childcare	3,565.76
17-12-85	Guardian Angel Settlement	Food Pantry	1,825.88
16-36-23	Harambee Youth Training Corp.	Tuckpointing Program / Youth Job Training Program	1,800.00
16-36-30	Haven of Grace Residential Program	Haven of Grace Residential Program	50,000.00
17-11-31	Herbert Hoover Boys and Girls Club of Metropolitan St. Louis	Out of School Youth Development Services	364.24
17-10-55	Hi-Pointe Center, Inc	Supplemental Nutrition & Social Service Referral Program	28,837.80
17-14-21	Humanitri	Next Steps Home Offender Reentry Program	4,306.75
17-50-22	International Institute of Metropolitan St. Louis	Microenterprise Development	26,190.50
17-11-33	Kingdom House	Early Childhood Center	20,000.00
17-11-65	MERS Missouri Goodwill Industries	St. Louis Youth Jobs	1,423.33
17-11-62	Mission: St. Louis	Beyond Jobs:JTL	0.12
17-13-12	Myrtle Hilliard Davis Comprehensive Health Centers, Inc	Healthcare for Persons Experiencing Homelessness	20,833.36
15-36-21	Senior Home Security	Minor Home Repair Program	0.09
16-36-21	Senior Home Security	Minor Home Repair Program	0.28
16-10-60	St. Louis Public Schools	Family Support Centers	5,057.03

16-14-12	St. Francis Community Services	St. Francis Community Services	60,000.00
17-11-67	St. Louis Artworks	St. Louis Artworks 2017CDBG	2,504.85
18-11-73	St. Louis Community College	Emergency Medical Technician Academy	30,000.00
17-11-87	St. Louis Science Center	Youth Exploring Science at the Saint Louis	20,000.00
17-12-40	St. Louis Area Agency on Aging	Elderly Services	8.22
17-70-35	St. Louis Development Corp.	LRA Property Board-Up and Maintenance	73.07
17-90-90	St. Louis Development Corp.	SLDC Administration	11,545.65
17-50-25	St. Louis Development Corp.	Microenterprise Assistance for Minority Contractors	65,000.00
16-90-91	St. Louis Development Corp.	Capacity Building for Minority Contractors	3,977.50
10-50-03	St. Louis Development Corp.	Neighborhood Commercial District Program	8,747.19
13-50-03	St. Louis Development Corp.	Neighborhood Commercial District Program	116,141.02
14-50-03	St. Louis Development Corp.	Neighborhood Commercial District Program	10,684.88
15-50-03	St. Louis Development Corp.	Neighborhood Commercial District Program	21,289.68
17-11-36	The Board for Inner-City Missions of the United Church of Christ	Summer Youth Enrichment Camp	12,319.25
15-40-24	Tower Grove Neighborhood CDC	Shaw Blvd Lighting Improv	39,258.75
16-21-90	Tower Grove Neighborhood CDC	South Grand Lighting	23,462.50

17-11-69	Wyman Center, Inc.	Youth Thrive Supporting Strong Relationships with Police, Youth and Communities	19,110.00
18-11-68	Wyman Center, Inc.	Empowering Youth to Succeed	20,000.00
		<b>Total</b>	<b>829,109.03</b>

Funding Reprogramming Destination

The City of St. Louis continues to be committed to the priorities set forth in its 2015 – 2019 Consolidated Plan. As such, the City proposes to use the unspent funds from prior years on the following:

- CDA proposes through a Substantial Amendment to fund the following activities with unspent CDBG funds from prior years:
  - CDA proposes to use \$500,000 to assist the St. Louis Housing Authority with CDBG-eligible housing and/or public improvements projects at the Clinton-Peabody Housing Complex.
  - CDA proposes to use \$329,109.03 to fund the demolition of abandoned and severely deteriorated structures owned by the Land Reutilization Authority and located within the approved NRSAs.

The 2017 Annual Action Plan will be revised to reflect the reprogrammed funds.

**Citizen Participation – Review of Draft Substantial Amendment and Public Hearing Notice (June 2018)**

In accordance with 24 CFR Part 91.105(c)(3) for local governments, the substantial amendment public notice was released for citizen review and comments on June 15, 2018. During the 30-day public comment period, from June 15, 2018 – July 16, 2018, the Draft Substantial Amendment will be made available during regular business hours between 8:00 a.m. and 5:00 p.m., Monday – Friday at CDA, which is located at 1520 Market St. (63103). In addition:

- The availability of the Draft Substantial Amendment was advertised in the St. Louis American and St. Louis Post Dispatch on June 7 and June 8, 2018, respectively.
- The Draft Substantial Amendment is available at the Central Branch of the St. Louis Public Library, which is located at 1301 Olive Street (63103).
- The Draft Substantial Amendment is available on the CDA website: <http://www.stlouis-mo.gov/cda>.
- The availability of the Draft Substantial Amendment is posted on the CDA Facebook page.
- CDA emailed the public notice to its CDBG mailing list, which includes approximately 300 organizations, elected officials, and other community stakeholders.

- CDA forwarded the public hearing notice to Mind’s Eye Radio to notify individuals with vision impairments.
- CDA translated the public notice to Spanish, Bosnian, Chinese, Filipino, French, and Vietnamese and forwarded it to the International Institute to notify persons with Limited English Proficiency.

CDA will hold three public hearings to review the Draft Substantial Amendment and provide an opportunity for public comments:

**Wednesday, June 27, 2018**

O’Fallon Recreation Center  
4343 West Florissant (63115)  
6:00pm – 8:00pm

**Thursday, June 28, 2018**

Prosperity Connection  
2828 Gravois (63118)  
6:00pm – 8:00pm

**Friday, June 29, 2018**

CDA Boardroom  
1520 Market Street – Suite 2000 (63103)  
2:00pm – 4:00pm