



Public Review Draft

City of Biloxi CDBG Entitlement Program 2020 Consolidated Annual Performance Evaluation Report (CAPER)

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and

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City of Biloxi 2020
PUBLIC REVIEW DRAFT
CONSOLIDATED ANNUAL PERFORMANCE EVALUATION REPORT (CAPER)

CR-05 - Goals and Outcomes

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

In spite of labor and construction material shortages and other challenges caused by the COVID-19 pandemic, the City of Biloxi successfully completed construction of a CDBG-funded, major infrastructure project on schedule in Program Year 2020. Phase I of the East-West Neighborhood Access Road, constructed north of the CSX Railroad tracks between Dorries and Crawford Streets, provides two-lane vehicular access throughout the East Biloxi project area. Improved transportation connectivity helps maintain the cultural heritage identity of the neighborhood while enhancing emergency response times and improving the health and safety of the 4,285 people living in the project area, of whom 2,685 (62.66%) qualify as low- to moderate-income.

Comparison of the proposed versus actual outcomes for each outcome measure submitted with the consolidated plan and explain, if applicable, why progress was not made toward meeting goals and objectives. 91.520(g)

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

The City achieved its goal to complete constructing of Phase I of the East-West Neighborhood Access Road Project, benefitting the 4,285 residents who live in this low- to moderate-income area. Phase II of the project was initiated during PY2020, with the engineering contract awarded in April 2021 and the environmental review underway with completion anticipated by the end of the 2021 calendar year.

A total of \$65,276.43 was disbursed to support public service activities provided by five nonprofit agencies, benefitting 280 residents. The sixth agency selected for a CDBG public service subgrant did not expend any CDBG funds and did not submit any reports to the City. Discounting the 100 projected beneficiaries anticipated to be served by the sixth nonprofit agency reduces the City's program year goal of 406 combined total beneficiaries to 306. Based on this, the City considers the performance of the five other nonprofits successful as they served a combined total of 280 residents successful, 26 people fewer than estimated.

Had it not been for social distancing mandates, temporary and permanent business closures, temporary school closures and other COVID-19

impacts, the City is confident its beneficiary projection would be fully achieved and all budgeted funds expended as intended. However, the Mississippi Center for Justice periodically discontinued face-to-face consultations and the two early childhood daycare programs and the youth educational program periodically closed due to the coronavirus. Of the \$80,000 budgeted for public service activities in PY2020, \$14,724 was unexpended at year end and will be reallocated to CDBG projects in PY2021.

Goal	Category	Source / Amount	Indicator	Unit of Measure	Expected Strategic Plan	Actual – Strategic Plan	Percent Complete	Expected – Program Year	Actual – Program Year	Percent Complete
Expand Economic Opportunities	Expand Economic Opportunities	CDBG: \$	Jobs created/retained	Jobs	10	0	0.00%	0	0	0
Infrastructure Improvements	Non-Housing Community Development	CDBG: \$	Public Facility or Infrastructure Activities other than Low/Mod Income Housing Benefit	Persons Assisted	25	0	0.00%	0	0	0
Nonprofit Agency Facility Improvements	Non-Housing Community Development	CDBG: \$	Other	Other	5	0	0.00%	0	0	0
Public Safety Improvements	Non-Housing Community Development	CDBG: \$	Public Facility or Infrastructure Activities other than Low/Mod Income Housing Benefit	Persons Assisted	25	0	0.00%	0	0	0
Public Services-Housing Services	Affordable Housing Homeless	CDBG: \$	Public service activities for Low/Mod Income Housing Benefit	Households Assisted	15	0	0.00%	0	0	0

Public Services- Natural Disasters & Emergencies	Affordable Housing Homeless Non-Housing Community Development	CDBG: \$	Public service activities other than Low/Mod Income Housing Benefit	Persons Assisted	20	0	0.00%	0	0	0
Public Services- Non-Housing Community Development	Non-Housing Community Development	CDBG: \$	Public service activities other than Low/Mod Income Housing Benefit	Persons Assisted	50	0	0.00%	406	280	68.96%
Transportation Improvements – Phases I & II	Non-Housing Community Development	CDBG: \$	Public Facility or Infrastructure Activities other than Low/Mod Income Housing Benefit	Persons Assisted	6735	4285	63.62%	6735	4285	63.62%

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

Assess how the jurisdiction’s use of funds, particularly CDBG, addresses the priorities and specific objectives identified in the plan, giving special attention to the highest priority activities identified.

While no progress was made on five of the high priority goals identified in Biloxi’s Five-Year Consolidated Plan during Year One of the plan due to insufficient resources, PY2020 CDBG Entitlement funds administered by the U.S. Department of Housing and Urban Development (HUD) allowed the City to achieve success toward the Transportation improvements goal and in expanding access to several key public service needs of low- to moderate-income residents.

The City invested its PY2020 CDBG resources to address high priority needs that included completing construction of Phase I of a neighborhood road to improve access and emergency response times and high priority public services that included affordable early childhood education and daycare programs; affordable recreational programs; affordable legal services to assist residents with filing fair housing violations and addressing other CDBG-eligible issues; and providing housing and expanded supportive services to meet the needs of homeless persons, especially those needing healthcare and mental health services.

CR-10 - Racial and Ethnic composition of families assisted

Describe the families assisted (including the racial and ethnic status of families assisted). 91.520(a)

	CDBG
White	86
Black or African American	189
Asian	2
American Indian or American Native	3
Native Hawaiian or Other Pacific Islander	0
Total	280
Hispanic	0
Not Hispanic	280

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

Narrative

During PY2020, most of the families assisted with CDBG-funded activities were Black and none of those served were identified as Hispanic. There was a total of 120 households headed by females; of the 25 households assisted through the CDBG-CV rent program, 19 were headed by females. Assisted those assisted, 139 were extremely low income, 89 were low income and 49 were moderate income. Three of the residents served by the Mississippi center for Justice were above moderate income.

In addition to public service activities assisted with CDBG funding during PY2020, the City budgeted 100% of its Round 1 allocation of CARES Act funds to a rent assistance program administered by the Open Doors Homeless Coalition to prevent an increase in homelessness caused by the coronavirus. The employment of many Biloxi residents was impacted by the pandemic, especially those employed in the tourism industry, because of social distancing mandates and periodic school, daycare and business closures. Once HUD guidance addressed rent payment in arrears, Open Doors provided up to six consecutive months of rent and utility assistance on behalf of qualified Biloxi residents.

During PY2020, 25 households, comprised of 65 total people, benefited from this public service activity, which will continue into PY2021. Of the people served, 21 were White and 44 were Black. Seven people identified themselves as Hispanic and there were 19 Female Heads of Households.

CR-15 - Resources and Investments 91.520(a)

Identify the resources made available

Source of Funds	Source	Resources Made Available	Amount Expended During Program Year
CDBG	public - federal	\$638,095	\$724,428.61

Table 3 - Resources Made Available

Identify the geographic distribution and location of investments

Target Area	Planned Percentage of Allocation	Actual Percentage of Allocation	Narrative Description
Not applicable			

Table 4 – Identify the geographic distribution and location of investments

Narrative

The Resources table above includes only the PY2020 CDBG allocation and program income; it does not include unexpended CDBG funds available at the end of the program year totaling \$671,982.61 for total available of \$1,310,036.75 as identified in PR-26 – CDBG Financial Summary Report.

Explain how federal funds leveraged additional resources (private, state and local funds), including a description of how matching requirements were satisfied, as well as how any publicly owned land or property located within the jurisdiction that were used to address the needs identified in the plan.

The City's investment of CDBG funds did not leverage additional private, state or local funds. The CDBG Entitlement Program does not require matching funds, but City-owned rights-of-way were incorporated into the East-West Neighborhood Access Road Project Phase I, as needed.

CR-20 - Affordable Housing 91.520(b)

Evaluation of the jurisdiction's progress in providing affordable housing, including the number and types of families served, the number of extremely low-income, low-income, moderate-income, and middle-income persons served.

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

Table 5 – Number of Households

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

Table 6 – Number of Households Supported

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

There is no difference between goals and outcomes.

The City of Biloxi does not receive a HOME, ESG or HOPWA allocation. Because its CDBG allocation is invested to address high priority unmet community needs to benefit the largest number of its low- to moderate-income residents possible, the City does not budgeted CDBG resources to produce, rehabilitate or acquire housing.

The City has not budgeted any of its PY2020 CDBG resources to support homeless, nonhomeless or special needs households in Biloxi. However, it budgeted its entire CARES Act allocation of \$272,001 to prevent and address increased homelessness in Biloxi caused by COVID-19.

The City executed a subrecipient agreement with Open Doors to administer this PY2019 public services activity that may provide up to six consecutive months of rent and utility assistance to eligible Biloxi individuals and households that have become homeless or that are at risk of becoming homeless because of COVID-19. The City anticipates that this public service activity will address and prevent homelessness into the 2022 calendar year until all funds have been expended. The activity served 65 people (25 households) rather than the 70 people projected as beneficiaries for PY2020. Implementation of the program was delayed pending HUD guidance regarding payment of rent in arrears, which may have impacted the City's ability to fully achieve its beneficiary goal.

Discuss how these outcomes will impact future annual action plans.

The City does not anticipate that these outcomes will impact future annual action plans.

Include the number of extremely low-income, low-income, and moderate-income persons served by each activity where information on income by family size is required to determine the eligibility of the activity.

Number of Households Served	CDBG Actual	HOME Actual
Extremely Low-income	0	Not applicable
Low-income	0	Not applicable
Moderate-income	0	Not applicable
Total	0	Not applicable

Table 7 – Number of Households Served

Narrative Information

The City does not receive HOME funds. The households identified in Table 13 benefited from public service activities supported with PY2020 CDBG resources.

The CDBG-CV rent assistance program funded through a Round 1 CARES Act allocation of \$272,001 served 65 people (25 households) of whom 45 were extremely low-income, 17 were low-income and 3 were moderate-income during PY2020.

CR-25 - Homeless and Other Special Needs 91.220(d, e); 91.320(d, e); 91.520(c)

Evaluate the jurisdiction's progress in meeting its specific objectives for reducing and ending homelessness through:

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

The City of Biloxi continued to work with the Open Doors Homeless Coalition Continuum of Care and its member agencies during PY2020 to achieve the goal of reducing and ending homelessness in all categories within the City. Open Doors shared information from homeless population assessments with the City to maintain awareness of current affordable housing and related needs of each homeless individual and family in Biloxi.

In collaboration with Open Doors, the City of Biloxi also continued working with the Biloxi Housing Authority, Back Bay Mission, Gulf Coast Center for Nonviolence, the Biloxi Diocese and other agencies and stakeholders to share information about Biloxi's homeless and at-risk of homelessness populations and continued efforts working with these partners to generate private donations to meet incidental needs of homeless populations. The City also continued to support funding applications pursued by local nonprofit agencies to reduce the number of homeless and unsheltered persons in Biloxi.

The City worked with Open Doors and neighboring local units of government to address and prevent increased homelessness as a result of COVID-19 through CDBG-CV funding made available through the CARES Act in PY2020.

Addressing the emergency shelter and transitional housing needs of homeless persons

The City continued to participate as an active member of the Open Doors Homeless Coalition Continuum of Care and supported efforts of Open Doors and its other member organizations to expand emergency shelter and transitional housing inventories in Biloxi.

Helping low-income individuals and families avoid becoming homeless, especially extremely low-income individuals and families and those who are: likely to become homeless after being discharged from publicly funded institutions and systems of care (such as health care facilities, mental health facilities, foster care and other youth facilities, and corrections programs and institutions);

and, receiving assistance from public or private agencies that address housing, health, social services, employment, education, or youth needs

During PY2020, the City continued to collaborate with Open Doors to encourage local housing services agencies and religious institutions to expand services to help low-income individuals and families avoid becoming homeless, especially extremely low-income individuals and families and those who are being discharged from publicly funded institutions and systems of care such as health care facilities, mental health facilities, foster care and other youth facilities, and corrections programs and institutions. Services and assistance, including rent, utility and security deposit grants, expanded access to affordable housing for low-income households as well as for those being discharged from publicly funded institutions and systems of care.

The City of Biloxi continued to support the public and private agencies that address housing, health, public services, employment, education and youth needs by endorsing their applications for funding assistance and providing technical assistance as feasible with the City's limited staff and resources. The City also continued to support the Biloxi Housing Authority's ongoing Community and Supportive Services activities and programs.

Helping homeless persons (especially chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth) make the transition to permanent housing and independent living, including shortening the period of time that individuals and families experience homelessness, facilitating access for homeless individuals and families to affordable housing units, and preventing individuals and families who were recently homeless from becoming homeless again

During PY2020, the City continued to work with Open Doors Homeless Coalition to provide services that expanded access of homeless persons, especially chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth, to existing affordable housing units through rent, utility and security deposit assistance. 100% of the City's Round 1 allocation from the CARES Act was budgeted for a rent assistance program administered by Open Doors to prevent increased homelessness as a result of COVID-19 by providing rent and utility assistance to qualified Biloxi residents.

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

Actions taken to address the needs of public housing

During the October 1, 2020 – September 30, 2021 program year, the Biloxi Housing Authority continued to maintain its housing developments and encourage residents to participate in homeownership programs.

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

The Biloxi Housing Authority continued to support its Resident Councils and the FSS Program to encourage public housing residents to become more involved in management and participate in home ownership.

Actions taken to provide assistance to troubled PHAs

Not applicable; neither the Biloxi Housing Authority nor the Mississippi Regional Housing Authority No. VIII are identified as troubled.

CR-35 - Other Actions 91.220(j)-(k); 91.320(i)-(j)

Actions taken to remove or ameliorate the negative effects of public policies that serve as barriers to affordable housing such as land use controls, tax policies affecting land, zoning ordinances, building codes, fees and charges, growth limitations, and policies affecting the return on residential investment. 91.220 (j); 91.320 (i)

Biloxi's official zoning district map allows for a mixture of single- and multi-family residential units on varying lot sizes throughout the City as well as group homes in a variety of areas. Other land use regulations support sustainability measures and provide for density bonuses when combined with natural resource preservation and/or other public benefits. Mixed use zoning is permitted in the central business area.

The City has adopted the latest version of the International Building Code, which requires compliance with Americans With Disabilities Act and Fair Housing Act provisions. There are no specific growth limitations or other public policies in place that would affect return on residential investment. Unlike construction costs and insurance premiums, property taxes in Biloxi have not increased during the past 22 years.

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

The City of Biloxi continued to work with other local units of government, religious institutions and area nonprofits to share information about the needs of underserved members of the community in an effort to encourage increased private support to address underserved needs.

City worked during PY2020 with local nonprofits such as Moore Community House to assist in locating facilities to support expansion of affordable daycare services and other high priority community needs. It also continued to work with Open Doors and the Catholic Diocese to expand affordable housing options for Biloxi's homeless and unsheltered populations.

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

The City of Biloxi continued to share information with residents, housing developers and others about lead-based paint hazards; free information brochures are available at City Hall and in the Building Division. All of the Biloxi Housing Authority's housing units have been assessed and, where required, abated of LBP hazards.

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

In spite of the pandemic, the City of Biloxi continued to work during PY2020 to reduce the number of poverty-level families by redeveloping and diversifying the local economy to provide expanded employment opportunities. While no official goals, programs or policies have been adopted, the City actively recruits new businesses and facilitates expansion of existing businesses through an expedited development review process and the provision of technical assistance by staff throughout the development process.

The City also continued to support participation of the Biloxi Housing Authority in the HUD/HCV/Family Self Sufficiency Program to help reduce the number of poverty-level families.

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

By continuing to participate as an active member of the Open Doors Homeless Coalition, the City stayed informed about activities and services that area nonprofits provide. Staff maintains ongoing communications with the Biloxi Housing Authority and others as it encourages development and implementation of rental housing assistance programs to make existing rental housing stock more accessible to low- to moderate-income households as well as the homeless.

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

Participation in the Open Doors Homeless Coalition Continuum of Care activities and meetings has enhanced coordination between the City and public and private housing and social service agencies. The annual Point in Time homeless population count and other programs continue to be supported by numerous agencies, including the City of Biloxi. Food, clothing and toy drives are well coordinated by community agencies to maximize their impact on underserved residents.

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

The City collaborated with the Mississippi Center for Justice and Biloxi Housing Authority to conduct the annual Fair Housing Workshop in January 2020. The workshop was well attended and included representatives from several local nonprofit agencies as well as realtors. Fair housing education information is shared periodically in the City's monthly Bmail that is mailed to each household in Biloxi and free brochures are available at City Hall, Community Development and Engineering to share Fair Housing Act information and how to file complaints for Fair Housing Act violations.

CR-40 - Monitoring 91.220 and 91.230

Describe the standards and procedures used to monitor activities carried out in furtherance of the plan and used to ensure long-term compliance with requirements of the programs involved, including minority business outreach and the comprehensive planning requirements

The City of Biloxi regularly monitors its performance in spending CDBG funds and meeting program goals through timely expenditure of these funds. The City more formally assesses its performance at least once annually and conducts an annual public hearing to inform the public of its progress in implementing and completing CDBG-funded activities each program year.

Expenditures are monitored on an on-going basis throughout implementation of each activity to ensure timeliness of expenditures and compliance with project budgets as well as eliminate opportunity for mismanagement, fraud or waste.

The City utilizes existing policies and procedures to monitor program administration and regulatory compliance. To ensure compliance, the staff monitors specific areas as follows: program performance review; financial management practices; record keeping and reporting practices;

general management practices; compliance with EEO, Fair Housing, ADA, anti-discrimination and others.

To document compliance with applicable regulations, policies and procedures, the City monitors its subrecipients on an on-going basis analyzing actual performance against subrecipient requirements and conditions. Provided to each subrecipient at the start of each CDBG program year, Biloxi's CDBG Standard Operating Procedures identify how each subrecipient will set up and implement a CDBG activity and provides the forms necessary to document projected versus actual outcomes; beneficiary eligibility; and compliance with procurement and other regulations. Throughout each program year, the City reviews subrecipients' monthly and quarterly reports, as well as other required forms, and conducts on-site monitoring of each subrecipient to monitor compliance and timely implementation of each activity. The City takes corrective action as soon as an issue becomes apparent to minimize compliance issues and opportunities for misuse of funds.

To ensure compliance with CDBG program requirements, including minority business outreach, timeliness of expenditures and comprehensive planning requirements, City staff attends HUD-sponsored workshops and training on an on-going basis, participates in applicable webinars and incorporates HUD guidance into its programs and operating procedures. The staff also regularly communicates with HUD Field Office staff and reviews the HUD website for program compliance updates.

City compliance is specifically discussed at each CDBG public hearing, including comprehensive planning and timeliness of expenditures. Compliance with minority business outreach requirements is ensured through ongoing implementation of the City's procedure requiring all HUD-funded Requests for Proposals and Requests for Qualifications be provided in a timely manner to the Mississippi Contract Procurement Center and mailed, return receipt requested, to known minority and female-owned firms.

The City's outreach to minorities and women includes posting information in English, Spanish and Vietnamese on the City's website and in public buildings located throughout the City, including the Biloxi Housing Authority. Written flyers are distributed in English, Spanish and Vietnamese to known local nonprofits that serve and/or represent minorities, low-income residents, and non-English-speaking residents.

**Citizen Participation Plan 91.105(d); 91.115(d)
Describe the efforts to provide citizens with reasonable notice and an opportunity to comment on performance reports.**

The City complies with the intent and literal requirements of its Citizen Participation Plan by making every effort to encourage broad public input into development of activities and programs assisted with CDBG Entitlement Program resources.

In an effort to provide citizens with reasonable notice and opportunity to comment on performance reports and other HUD-required plans and reports, the City of Biloxi not only publishes and posts notices, but delivers flyers in English, Spanish and Vietnamese to known nonprofits that primarily serve non-English-speaking residents, low-income residents, minorities and persons with disabilities. The flyers and notices invite and encourage the participation of all residents into the CDBG process through submission of oral and written comments.

The City of Biloxi makes its Consolidated Annual Performance Evaluation Report (CAPER) available to the public for examination and comment for a period of at least 15 days and publishes two notices to advertise the report's availability for review. In addition to posting each annual performance report on the City's website for public review, hard copies are distributed for public review to the four branches of the Biloxi Public Library, the Biloxi Housing Authority, the Mayor's Office, City Hall, the Community Development Department and the Public Works/Engineering Building. The published notices indicate where the public review copies are located.

A public hearing for the PY2020 CAPER was held on December 7, 2021, after being advertised in the City's Bmail publication that is mailed by the first of each month to every household in Biloxi and posted as described above. All notices included information about the availability of the Public Review Draft of the 2020 CAPER and encouraged attendance at the public hearing. Compliance with the Biloxi Citizen Participation Plan for the 2020 CAPER is documented in an attachment at screen CR-00 Administration, oral and _____ written comments were formally submitted to the City for consideration during the citizen participation process.

CR-45 - CDBG 91.520(c)

Specify the nature of, and reasons for, any changes in the jurisdiction's program objectives and indications of how the jurisdiction would change its programs as a result of its experiences.

At this time, the City has not identified any CDBG program changes as a result of its experiences.

Does this Jurisdiction have any open Brownfields Economic Development Initiative (BEDI) grants? No

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