



# **PY 2022 Consolidated Annual Performance and Evaluation Report (PY 48 CAPER)**

**DRAFT**

City of Meriden  
Economic Development Department  
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## **CR-05 - Goals and Outcomes**

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

This could be an overview that includes major initiatives and highlights that were proposed and executed throughout the program year.

The City of Meriden is an entitlement jurisdiction, receiving an annual allocation of Community Development Block Grant (CDBG) program funds through the US Department of Housing and Urban Development (HUD). These funds help the City address the housing, community and economic development objectives outlined by HUD, which include, but are not limited to: the development and preservation of affordable housing, public facility and infrastructure improvements, small business assistance, and vital services for low- to moderate-income (LMI) and special needs populations. Accomplishments for PY 2022 are highlighted below.

**Affordable Housing:** The City's Neighborhood Preservation Program (NPP), continues to identify and help LMI households with housing rehab activities. There was one (1) LMI household assisted with the purchase and installation of a new water heater unit. Rehab activities continue to be in various stages of development, and will be reported as they are completed. Code enforcement activities had a citywide low/mod benefit.

**Public Facility & Infrastructure Improvements:** An estimated 9,365 persons in LMI areas benefitted from improvements to sidewalks that provided for a safer walking environment. These activities included continued improvements at Caitlin St., Griswold St., Sherman St. and Bunker St. The City finally completed the Gallery 53 Meriden Mosaics activity, benefitting an estimated 59,395 persons in citywide low/mod areas.

**Public Services:** The City and its partners provided several public services which helped to improve the quality of lives for the special needs and LMI population in Meriden. A total of 2,330 persons who were counted through LMC were served in PY 2022. Services for special needs groups included victims of domestic violence, and mental health services. Services for LMI persons included youth enrichment and prevention, employment services, housing referral services, subsistence payments and childcare services. The City also had food programs and services which benefitted residents citywide living in low/mod areas (LMA) through the Meriden Soup Kitchen.

**CARES:** Many CDBG-CV activities have already been successfully reported in the prior CAPER, and this PY continues this progress. Mental health services were provided by Franciscan Life Center Network, Inc., which also updated its services technology preparedness activities and this benefitted 124 LMI persons. Literacy Volunteers provided assistance to help hire a Literacy Outreach worker to assist 107 LMI persons with CV outreach and recruiting. The City will continue to monitor LMI households still impacted by the pandemic.

**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.

Goal	Category	Source	Indicator	Unit of Measure	Expected – Strategic Plan	Actual – Strategic Plan	Percent Complete	Expected – Program Year	Actual – Program Year	Percent Complete
1A. Expand Public Infrastructure	Non-Housing Community Development	CDBG	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	Persons Assisted	25000	59395	237.58%	5000	0	0.00%
1B. Improve Public Infrastructure Capacity	Non-Housing Community Development	CDBG	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	Persons Assisted	25000	75330	301.32%	5000	9365	187.30%
1C. Improve Access to Public Facilities	Non-Housing Community Development	CDBG	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	Persons Assisted	25000	118790	475.16%	5000	59395	1187.90%
2A. Preserve Existing Homeowner & Rental Hsg Units	Affordable Housing	CDBG	Homeowner Housing Rehabilitated	Household Housing Unit	25	15	60.00%	10	1	10.00%
2B. Provide Code Enforcement in LMI Neighborhoods	Affordable Housing	CDBG	Housing Code Enforcement/Foreclosed Property Care	Household Housing Unit	25000	178185	712.74%	5000	59395	1187.90%

2C. Provide for Homeownership Assistance	Affordable Housing	CDBG	Homeowner Housing Added	Household Housing Unit	20	0	0.00%			
2C. Provide for Homeownership Assistance	Affordable Housing	CDBG	Direct Financial Assistance to Homebuyers	Households Assisted	40	0	0.00%			
3A. Provide Supportive Services for Special Needs	Non-Homeless Special Needs	CDBG	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	110000	17015	15.47%	22000	1225	5.56%
3B. Provide Vital Services for LMI Households	Non-Housing Community Development	CDBG	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	110000	124656	113.32%	22000	60500	275.00%
4A. Provide for Small Business Assistance	Non-Housing Community Development	CDBG	Businesses assisted	Businesses Assisted	50	39	78.00%			
4B. Planned Repayment of Section 108 Loan	Non-Housing Community Development	CDBG	Other	Other	1	1	100.00%	1	1	100.00%

**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.**

PY 2022 is the third year of the 2020-2024 Consolidated Plan. The plan was developed through a community and housing data analysis and input from citizens, and identified public facilities and infrastructure improvements, affordable housing development and preservation, economic development and public services for low- to moderate-income (LMI) and special needs populations as its priorities. Funds from CDBG were used to address these high priority needs in Meriden, and a number of objectives were completed as a result of these investments. The PR07 Drawdown

Report reported the following fund expenditures for PY 2022 for each priority.

Public Services: \$81,155.78 (7.0%) Note that the City has a waiver to spend up to \$220,000 for public services each year.

Expand/Improve Public Infrastructure & Facilities: \$544,929.39 (46.8%)

Preserve & Expand Affordable Housing: \$337,328.00 (29.0%)

Section 108 Loan Repayment: \$97,282.50 (8.4%)

Administration: \$103,849.45 (8.9%)

Total CDBG Expenditures: \$1,164,545.12

### ***Overview of PY 2022 Goals Accomplished***

1A. Expand Public Infrastructure: The City had a goal for 5,000 to be assisted, and this goal was not completed in PY 2022. The City was focused on public infrastructure improvements and may remove this goal in future plans as to not duplicate goals and efforts.

1B. Improve Public Infrastructure Capacity: The City had a goal for 5,000 to be assisted, and an estimated 9,365 in low/mod areas were serviced. This is intended to be an area-wide low/mod benefit. These were associated with completed activities at Caitlin St., Griswold St., Sherman St and Bunker St.

1C. Improve Access to Public Facilities: The City had a goal for 5,000 to be assisted, and an estimated 59,395 in low/mod areas were serviced. The improvement activity was associated with completion of the Gallery 53 Meriden Mosaics activity.

2A. Preserve Existing Homeowner & Rental Hsg Units: The City had a goal to assist 10 LMI households with the NPP housing rehab loan program, and 1 LMI household was assisted in the program year. There are projects in different stages of development and the City report these in future CAPERs. The City will also continue to identify residents in need of this assistance and work to achieve this annual goal.

2B. Provide Code Enforcement in LMI Neighborhoods: There was a goal to assist 5000 residents in LMI areas with code enforcement activities, and the City exceeded this goal with activities that benefit 59,395 in low/mod areas.

2C. Provide for Homeownership Assistance: This goal is a long-term goal in the 5-Year Consolidated Plan, and there were no goals for this in the

PY 2021 AAP.

3A. Provide Supportive Services for Special Needs: There was a goal to assist 22,000 special needs persons, and the City funded programs that assisted 1,225 special needs persons. The City may revise this goal estimate in the future.

3B. Provide Vital Services for LMI Households: There was a goal to assist 22,000 LMI persons, and the City served 60,500 LMI persons. This was achieved through food programs which benefitted residents citywide and through the various programs such as youth, employment services and health services.

4A. Provide for Small Business Assistance: This goal is a long-term goal in the 5-Year Consolidated Plan. With CDBG-CV funds, the City has now assisted 39 small businesses impacted by COVID-19.

4B. Planned Repayment of Section 108 Loan: The City made a loan repayment of \$97,282.50 in PY 2022. This Section 108 loan repayment to HUD was for the demolition and environmental remediation of the former Insilco Factory H building site.

### **Additional CDBG Program Narratives**

As the previous CDBG administrator left the City, the program did not have a staff administrator for about 9 months of the program year. Due to this, the City had difficulty executing sub-recipient agreements with local public service providers, and this led to not having many completed planned public service activities. Also, as the CDBG administrator position was vacant for most of the program year, admin expenses were low. Now that the position has been filled, there has been training and technical assistance provided and the program is moving forward again. Contact has been made with public service providers and nonprofits, and this will include technical assistance and basic program training.

### **PR23 Differences to CR-05 Reporting**

The City had several activities that were still open from previous program years that were just recently completed/closed in the current reporting year. The PR23 Summary of Accomplishments report captures all these open activities regardless if they have been reported in previous CAPER reports or not. Due to this reason, the estimated persons receiving benefits is reported as much higher on the PR23, than what is reported in the CR-05 goal table above. The City has removed any activity accomplishment that was already reported in previous year CAPERs so as not to duplicate the benefits counted.

## 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	1,369
Black or African American	560
Asian	25
American Indian or American Native	5
Native Hawaiian or Other Pacific Islander	9
<b>Total</b>	<b>1,968</b>
Hispanic	995
Not Hispanic	1,336

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

### Narrative

**DATA NOTE:** The data above was drawn from the beneficiary accomplishments from the PY 2022 PR23 Summary of Accomplishments and the PR03 CDBG Activity Summary Report. The table above does not include a category for people that identify as “other” or “multiple races” nor does it include the beneficiaries of projects determined to have an "area benefit" to the community, such as public improvements to sidewalks and streets in low/mod income areas. Therefore, the data in the above table does not necessarily match the numbers of all people actually served by the CDBG program. Please also note, the accomplishments listed above are lower than what is reported in the PR23 because the City has removed any accomplishments that has already been reported in previous CAPER reports. The table above reports 1,968 persons assisted, however the actual total served was 2,331 persons. There were 363 “other” or “multiracial” persons assisted which was not included in the table above.

According to the most recent 2016-2020 American Community Survey 5-Year Estimates, the total population of Meriden was 60,790 and 67.8% were white, 9.5% were black and 2.6% were Asian. Some other race were 6.9% and Two or more races were 12.6%. All other minority groups combined was less than 1%. Persons who identified ethnically as Hispanic were 35.6% of the citywide population.

Approximately 24.0% of CDBG funding went towards assisting black persons and 1.1% went towards Asians. Other multiracial persons assisted were 14.8% and Two or more races were 0.8%. All other minority races accounted for less than 1%. For persons who identified as Hispanic, 42.7% of CDBG funding went towards assisting this group. With the exception of smaller race groups such as Asians, the percentage of persons assisted with CDBG funds were in line with the City demographics.



## **Housing Needs Assessment**

The Needs Assessment in the City's 2020-2024 Consolidated Plan, assesses if any racial and ethnic group by income category has a disproportionate need in the area with regards to housing problems, severe housing problems and cost burden. Households with housing problems are those that reside in units lacking complete kitchen and plumbing facilities as well as overcrowding (more than one person per room) and cost burden (spending 30% or more of income on housing per month). Households with "severe housing problems" are those that reside in units lacking complete kitchen and plumbing facilities as well as severely overcrowded homes (more than 1.5 person per room) and severe cost burden (spending 50% or more of income on housing per month).

Housing Needs Assessment (NA-1)5): According to the Needs Assessment, for regular housing problems, Asian households experience a disparity in very-low income levels (30-50% AMI).

Severe Housing Needs Assessment (NA-20): For severe housing problems, Asian households again experience a disparity in very-low income levels (30-50% AMI).

Housing Cost Burden (NA-25): For housing cost burden, there were no minority households experiencing a disproportionate need.

In PY 2022 the City only completed one housing rehab activities through the NPP program. The household was an extremely low-income white household. The program currently has several different projects in various stages of development and will be reporting these benefits in future CAPER reports. Due to the small number of households assisted through the program in any given year, the City may not be able identify all minority groups with this need in each year of the program.

## 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	1,347,461	1,164,545

Table 3 - Resources Made Available

### Narrative

In PY 2022 there was \$979,930 in CDBG funds made available to the City through the annual allocation and \$367,531 from Revolving Loan Funds (RL) for a total of \$1,347,461. RL funds the City's Neighborhood Preservation Program (NPP). It is funding that is used solely for NPP, which provides low-interest, forbearance loans for owner occupied rehabilitation projects.

According to the PR07 Drawdown Report the City expended \$1,164,545 in the program year. These funds went towards public improvements to sidewalks, affordable housing activities, vital public services for special needs groups and LMI households, and repayment of a Section 108 loan in association to the Factory H economic development project. A detail of funds spent by priority is listed below:

Public Services: \$81,155.78 (7.0%)

Expand/Improve Public Infrastructure & Facilities: \$544,929.39 (46.8%)

Preserve & Expand Affordable Housing: \$337,328.00 (29.0%)

Section 108 Loan Repayment: \$97,282.50 (8.4%)

Administration: \$103,849.45 (8.9%)

Total CDBG Expenditures: \$1,164,545.12

Note: As mentioned earlier in the CR-05, the City's CDBG administrator position was vacant for most of the program year, and therefore admin expenses were low. Likewise, the City had difficulty executing sub-recipient agreements with local public service providers, and this led to not having many completed planned public service activities and low expenditures for this priority.

### CARES Act Funds:

The City received a total of \$1,045,687 in CDBG-CV grant funds to fund activities that prevent, prepare for and respond (PPR) to the COVID-19 pandemic. In PY 2022, the City expended another \$61,926.58 in CDBG-CV funds towards public services for LMI residents still impacted by the pandemic. This brings total expenditures for the life of the program to \$341,207.56 and leaves a remaining balance of \$704,479.44 or 67%. The PR26 CDBG-CV Financial Summary Report has been uploaded to confirm expenditures for the program.

**Identify the geographic distribution and location of investments**

Target Area	Planned Percentage of Allocation	Actual Percentage of Allocation	Narrative Description
Central Downtown Area	100	100	Investments continue to be focused on the downtown area due to it being the highest concentration of LMI

**Table 4 – Identify the geographic distribution and location of investments**

**Narrative**

CDBG investment in Meriden is targeted towards downtown neighborhoods, which contain low- to moderate-income households, sub-standard housing conditions, and a concentration of vacant or underutilized properties. The City recognizes that the revitalization of its downtown neighborhoods is linked to the revitalization of its economy as a whole. It also continues to be the location of many of the non-profits and other groups that provide vital services to the area's residents.

The percentage of funds shown in the geographic distribution table is an approximation, however the City has several mechanisms to ensure funds are directed towards the Central Downtown Area. Included in the Central Downtown Area funds are the public improvements, housing rehab, and the Section 108 repayment projects. Also included are public service activities that are specifically located in the downtown, or predominantly serve the residents of downtown.

## Leveraging

**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.**

Federal CDBG funds are a primary source of funds that helps to leverage other monies and human capital on an annual basis in the City of Meriden. All City funded organization through the CDBG program have a budget that includes funds that are non-CDBG related but are still used to help provide vital services to City citizens. Program partners include small and large nonprofit agencies; local community organizations; and other local government agencies and departments. CDBG funds received by these various organizations are often used as leverage to help secure other local grants.

Funding of the Rehab Administration Program, Code Enforcement, and the Inner City Sidewalk improvement activities also help to maintain the momentum of the significant Federal and state financial investment that has occurred in the downtown area of Meriden in the past 6+ years. This other assistance has come from the Federal Government in the form of EPA assessment and cleanup grants, from the State of Connecticut in the form of Brownfields Cleanup grants & loans and a rebuilt train station, and numerous municipal monetary outlays.

Additionally, the City received a \$2,000,000 grant and \$2,000,000 loan from the Connecticut Department of Economic and Community Development (DECD), and a \$200,000 EPA Brownfields Grant for the remediation of the vacant Meriden Wallingford Hospital at 1 King Place. This structure is slated to be turned into mixed-use market rate development, with funds for the conceptual site reuse plan coming from a \$100,000 DECD Brownfield Area-wide Revitalization Planning Grant.

### *Publicly Owned Land or Property Used to Address Needs in the Plan*

The City has limited developable land, thus greatly affecting the ability to construct new affordable housing units. However, the City continues to be actively involved in redevelopment efforts in its downtown that will provide new affordable housing as part of mixed-use development centered on an updated transit hub. Brownfield sites and vacant buildings are being or have been assessed for environmental contaminants, remediated, repurposed and transferred to private partner organizations to be developed into usable, mixed-used developments with housing and economic development opportunities. Recent sites include 116 Cook Avenue, 1 King Place, 69 East Main Street, 11 Crown Street, and 121 Colony Street Rear. The City is also assisting in completing site re-use planning projects by working with landowners of vacant or underutilized parcels in the downtown area.

## 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	10	1
Number of Special-Needs households to be provided affordable housing units	0	0
<b>Total</b>	<b>10</b>	<b>1</b>

**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	10	1
Number of households supported through Acquisition of Existing Units	0	0
<b>Total</b>	<b>10</b>	<b>1</b>

**Table 6 – Number of Households Supported**

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

In PY 2022, the City had a goal to assist 10 non-homeless households with housing rehab activities. The City assisted 1 LMI homeowner with housing rehab through the City's Neighborhood Preservation Program (NPP) with the installation of a new water heater. The City has several projects in various stages of development and anticipates it will report these accomplishments in future CAPER reports. These activities will help to meet the established goals of the program.

**Discuss how these outcomes will impact future annual action plans.**

The City is continually working to identify eligible households for the NPP program. There are several projects in various stages of development that will help LMI residents with housing rehab, and the City

will continue to fulfill this need in the community. Housing rehab remains a priority for the City, and the City will continue to fund this activity in 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.**

<b>Number of Households Served</b>	<b>CDBG Actual</b>
Extremely Low-income	1
Low-income	0
Moderate-income	0
<b>Total</b>	<b>1</b>

**Table 7 – Number of Households Served**

### **Narrative Information**

In PY 2022 the City assisted one (1) extremely low-income household in the NPP program. Assistance provided was for the purchase and installation of a new water heater.

#### *Worst Case Needs*

Those with worst case needs are individuals or households at-risk of or experiencing homelessness and/or are extremely low-income. Extremely low-income households are at imminent risk of homelessness as they lack the funds to maintain housing during emergency and times of crises. CHAS data reported in the City’s Needs Assessment from the 2020-2024 Consolidated Plan estimates that there are approximately 680 homeowner and 1,440 renters that are extremely low-income (0-30% AMI) in Meriden that are also severely cost burdened (households paying 50% of income towards housing costs).

There was only 1 extremely low-income household assisted with homeowner rehab, however additional households have been identified for the NPP program and are undergoing eligibility review. When new households are identified for the program, the City will help enroll them for service to maintain the condition of their housing.

The City did not specifically report any persons with a disability in affordable housing programs, however if a household with a disability is identified for assistance in one of the housing programs, the City will make all necessary accommodations within reason to meet the needs of the household.

Finally, to address homelessness in Meriden, the City continues to work with the Coalition on Housing and Homelessness for services at the homeless shelters. These services are designed to help individuals and families find support, social services, medical, job and housing.

#### *Other Affordable Housing Activities*

On June 6, 2022 the City of Meriden adopted an Affordable Housing Plan (AHP), as required by the Connecticut General Statutes, Title 8, Chapter 126a § 8-30j. As a municipality of the state, the City must complete or update an AHP at least once every five years. The AHP provides a detailed analysis of the City's community and housing market, and provides strategies how the City intends to increase the number of affordable housing developments within Meriden. This housing strategies the City will consider over the next five years when addressing housing needs and opportunities include cross-cutting strategies, supply-oriented strategies, homeownership strategies and preservation strategies. The development process also included community input through public meetings, public hearings and a public review period. Details of the four housing strategies the City will adopt are located in the CR-35.

## **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 allocated resources towards the provision of housing and counseling services to individuals who are either homeless or are at risk of becoming homeless. These services include the Women and Families Center's "Project Reach" which directly benefits runaway, homeless and at-risk youth ages 18-24 by seeking out youth where they congregate and providing supportive services to build self-sufficiency and identify stable, long-term housing. The program also provides transitional housing services to young adults, economic training, and independence through job readiness programs and education.

The City is also currently working with the Meriden Warming Center from Coalition on Housing & Homelessness, which provides outreach and warming shelters during extreme weather periods.

Shelter Now, operated by New Opportunities, Inc., is also a long-time partner of the City. Shelter Now provides shelter to homeless persons while also supporting a portion of the full-time case management position. This position provides support and coordinates service assistance for Shelter residents. Services including implementing individual evaluations, working with participants to develop activities to reach their goals, providing necessary intervention and cultivating and maintaining program links with area social service agencies, medical providers and appropriate support programs, helping to get residents into treatment, securing a job and enrolling in school.

The Meriden-Wallingford Chrysalis DV Self-Sufficiency Program provides outreach and support to women and children at risk of homelessness due to domestic violence. The City supported the organization's transitional housing services.

Through the CDBG-CV program, additional outreach and support is offered through the Meriden Soup Kitchen to residents facing food insecurity. The agency provides hot food at no cost, and also offers take-out capacity due to the current pandemic situation.

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

The Shelter NOW program, operated by New Opportunities, Inc., provides assistance to shelter residents via intake, case management and supportive services necessary to make the transition from temporary housing to non-emergency assistance or complete self-sufficiency. Shelter NOW has seen an increased number of residents requiring shelter services due to the scarcity of relevant job opportunities and an increased number of foreclosures/evictions affecting its population. Activities at the shelter include assessing the situation of clients at the time of entry and developing a plan for family intervention,



treatment, job placement, school enrollment and other long/short term goals. New Opportunities is continuing work to expand the facility to increase capacity and services. The program was again supported in PY 2022.

**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**

Case management and life-skills services were offered by Meriden-Wallingford Chrysalis, Shelter NOW, and the Women and Families Center's Project REACH to help low-income individuals and families avoid becoming homeless.

The Salvation Army Comprehensive Emergency Assistance Program and the New Opportunities Rental Assistance/ Security Deposit Program offer immediate housing-related financial aid to households who may be at risk of homelessness or are facing severe housing cost burden. The goal of these programs is to keep families and individuals in their homes and ameliorate the financial constraints that can lead to short and/or long-term homelessness. Eligible families may be assisted with utility bills, rent or free basic needs.

Also funded in PY 2022 was the Meriden Farmers Market Doubling Dollars Program, which provides coupons to eligible participants in an effort to stretch their funds and offset other basic living needs costs such as housing. Finally, other food programs such as Joy Ministries' Bread of Life program which offer door-to-door services and Change the Play Summer Meals program also provide food for LMI residents and children. These programs help to offset costs that can go towards other basic living needs.

The Women and Family Center's Project REACH at Robyn's House and Open DOHR also works with vulnerable youth that are at-risk or already homeless. Project REACH staff provide services that include needs assessment and individualized case management, supportive counseling, referrals and links to services, education, and aftercare services.

Kuhn Employment Opportunities has an employment program that helps persons with a disability with employment which helps them to earn an income. These activities help LMI disabled persons to be economically sustainable.

The Meriden Housing Authority has found that providing rental subsidies to households below 80% of the median income level for the area is the most cost effective and practical means to address pending homelessness. The Meriden Housing Authority is continuing work to secure additional Section 8 Housing Assistance vouchers as they become available so that more individuals can be served.

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

The Shelter NOW Program begins working with individuals and families immediately upon intake to assess goals and develop a plan for transitioning out of temporary/emergency housing as quickly as possible given existing circumstances. This work is undertaken by an onsite case-manager.

The Meriden-Wallingford Chrysalis Self-Sufficiency Program provides help to income-eligible residents who need assistance with a range of issues, including employment, security deposits, job training, homelessness prevention and free furniture for those transitioning into new, independent housing. The program focuses on assisting survivors of domestic violence in navigating challenges faced when building their new lives from violence.

The Women and Family Center's Project REACH at Robyn's House and Open DOHR also works with unsheltered teens to begin the transition into permanent, stable and safe housing. Project REACH staff provide services that help homeless youth overcome their current situation and return to self-sufficiency. Some of the services provided include assessment and individualized case management, supportive counseling, referrals and links to services, education, and aftercare services as youth move from homelessness to safe and stable housing.

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

### **Actions taken to address the needs of public housing**

The Meriden Housing Authority (MHA) manages 221 public housing units and 915 Housing Choice Vouchers in the area. It's mission is to provide safe, decent, healthy and a responsive environment for its tenants while maintaining the fiscal integrity of the Authority.

MHA continues to undertake a multi-year effort to modernize and improve its aging housing stock. Recent developments include Yale Acres Redevelopment Phase I (162 units) and the Phase II expansion with 10 units. These developments have a development schedule of 22 and 18 months are currently in development. The MHA is closing on \$1.6 million for veteran's supportive housing at the Hannover Place Housing development with 10-units reserved for veterans at-risk of homeless. Silver City Apartments, a 41 residential unit development started in the prior program year is in a 20-month development schedule.

Projects various stages of developments are the Yales Acres Common Building and Warming Center, which is the Phase III in the modernization of Yales Acres. Plans include a community meeting room, gymnasium, heated pool, fitness center, child care center, community kitchen and more. Also planned are the 143 West Main Street mixed-income development with 45-units, and the Maple View Apartments located in the Transit Oriented District area in downtown.

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

The MHA has monthly meetings with residents to encourage them to share their concerns with management and provide feedback as to operations. Residents are also invited to review and make comments to PHA plans.

The MHA has a Family Self-Sufficiency (FSS) Program that is designed to assist Section 8 and public housing residents achieve economic independence. FSS is a HUD initiative and supports families by providing services and referrals for educations, career counseling, financial managements, job training and job placement services. A majority of participants receive a savings account that grows as the family's earned income rises, and upon completion they receive the accumulated funds in their account. This money may be used to purchase a home, pay for higher education, start a business or pursue other personal goals. FSS participants make a contract with the program to achieve goals which will help them towards self-sufficiency. These goals include, but are not limited to getting a GED or high school diploma, acquiring a driver's license, becoming debt-free, completing home buyer education, attending or graduating college, purchasing a car, rebuilding credit, saving money and buying a house.

The MHA also operates a comprehensive homeownership program that provides qualified FSS Section 8 participants with the education and support necessary to achieve the dream of owning their own home. Successful graduates can convert their Section 8 Voucher to a Homeownership Voucher. To qualify for this program the participant must have a Section 8 Voucher and live in the City of Meriden.

Finally, the City continued to fund the Neighborhood Housing Services of New Britain Financial & Housing Classes for Housing Authority Tenants. This program provides public housing residents with home buyer education.

### **Actions taken to provide assistance to troubled PHAs**

In the most recent PHA Plan, the MHA reported as a “troubled PHA”. To address this status, a corrective action plan has been implemented which will work to improve the scores for all the SEMAP indicators that resulted in the designation status. The MHA has entered into agreements with experienced agencies for the the management, oversight, and supportive services for its Housing Choice Voucher (HCV) program and for providing the services that are focused on assisting the MHA to reconcile the deficiencies and put in place procedures and practices in order to improve MHA’s current designation. The procedures put into place will ensure compliance going forward and return the MHA to a high-performing PHA.

The City doesn’t provide funds to directly address the MHA’s troubled PHA designation, however the City has worked closely with the MHA recently on developments in the central downtown areas. Working together maximizes the funds being used in these areas. The City also funds Financial & Housing Classes for MHA Tenants. The project will consist of providing first-time homebuyer classes and tenant goals to become more self-sufficient and financially successful at the Meriden Housing Authority.

## **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)**

The City of Meriden has collaborated with the Meriden Housing Authority through HUD's Choice Neighborhoods initiative for several recent projects. This includes the overhaul of the Mills Memorial Housing residences in the City's downtown neighborhood, which added 151 units of housing in place of the Mills dilapidated public housing facility. Other ongoing developments and planned developments by the MHA are summarized in the PHA section CR-30.

The Economic Development Department and Planning Department work closely with developers of multi-family housing to ensure that affordable housing is included in new construction of housing units. The City's Transit Oriented Development (TOD) zoning district that encompasses much of downtown Meriden is designed to promote denser housing and commercial uses surrounding the new train station, which has been serviced by the newly launched CT Rail since June 2018. Furthermore, the Planning Department is currently undertaking a close look at housing, both affordable and market rate, as part of the update of the City's Plan of Conservation and Development. Initial data points show that Meriden in fact has the second highest number of affordable units (4,077) in New Haven County, according to the CT Department of Housing. This number equates to 13.41 % of the City's housing stock.

### *Affordable Housing Plan*

On June 6, 2022 the City of Meriden adopted an Affordable Housing Plan (AHP), as required by the Connecticut General Statutes, Title 8, Chapter 126a § 8-30j. This requires that the City must prepare an AHP at least once every five years, and within the plan, outline how the City intends to increase the number of affordable housing developments within Meriden. The AHP has a development process which involves data analysis and community input through public meetings, public hearings and a public review period. Following the adoption of the AHP, the City must regularly review and maintain the plan.

This AHP provides housing strategies the City of Meriden will consider over the next five years when addressing housing needs and opportunities. The four categories include cross-cutting strategies, supply-oriented strategies, homeownership strategies and preservation strategies. A summary of each strategy is provided below:

- Cross-cutting strategies serve multiple affordable housing needs and often involve multiple action types. This strategy will seek to encourage production of new affordable units, preserve existing affordable units, create affordable ownership opportunities, and expand housing types.
- Supply-based strategies seek to encourage the production of more affordable units whether that means developing new affordable units or working to deed restrict existing units.

- Homeownership strategies aim to assist LMI households in becoming homeowners as well as supporting existing homeowners to maintain their homes.
- Preservation and maintain strategies aim to prevent subsidized and naturally occurring affordable units from being converted into market rate units. It also aims to improve the quality of existing affordable units to serve the needs of residents.

### **Actions taken to address obstacles to meeting underserved needs. 91.220(k); 91.320(j)**

The primary obstacle to underserved needs is funding. The lack of funding continues to have an impact on local municipalities, nonprofits, and other local service providers. The City of Meriden itself has seen its own budget pressures related to maintaining sufficient public services without increasing taxation levels, while in an environment of lowered state and federal assistance and increasing non-discretionary costs that must be paid.

CDBG funding remains consistent, however priorities must be set to continue to meet the needs of the community. In order to best allocate these funds, the Economic and Community Development Office worked closely with the Meriden City Council Human Services Committee and other City departments in an effort to avoid duplication of services and direct funding to the program and geographic areas of greatest need. Funded activities are reviewed annually in terms of timeliness and accomplishments to ensure that the greatest amount of need is being met with each CDBG award. In some cases, City staff have recommended decreased funding levels for activities that either underperform or do not submit required reporting and invoice materials in a timely manner so that funds can be shifted to more impactful activities. The City also continually explores alternative activities and programs that could be funded in order to better serve those in need.

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

Lead-based paint hazards are evaluated on a case-by-case basis in all of Meriden's Neighborhood Preservation Program (NPP) homeowner rehabilitation loans. Funding provided to City staff through the Housing project will in part cover housing inspections, and will address lead paint hazards as needed. Homes issued CDBG-backed loans through the NPP with children younger than six years old residing in them will be tested for lead based paint hazards if any work is to be performed that would pose a potential hazard to occupants. In the event children younger than six years old are exposed to lead poisoning they will be referred to the Connecticut Children's Medical Center "Lead Treatment Program.

The City refers cases to the Connecticut Children's Medical Center "Lead Treatment Program (LTP) to reduce residential lead hazards for low-income children under six years old. The LTP program has access to several federal funding programs that will be used to conduct risk assessments and inspections of housing units within targeted communities, provide lead hazard control education to families and property owners within targeted communities and provide property owners with financial assistance to rehabilitate housing units in targeted communities with identified lead hazards.

Lead-based paint hazards are considered when drafting program guidelines and reviewing potential projects, including improvements to commercial facilities. Activities that involve the rehabilitation of building structures built before 1978 are subject to the requirements set forth at 24 CFR 91.220(k) or 91.320(j).

The City is also a recipient of the Lead Hazard Reduction Grant from the HUD Office of Lead Hazard Control and Healthy Homes Department. The City will receive \$1,000,000 from the grant as well as a \$300,000 Healthy Homes Supplement Grant. With these funds, the City estimates it will abate lead in over 200 housing units over a four year grant period. These funds will also help the City to leverage additional funding that will address low/mod and deteriorating areas in Meriden, which align with the overall housing goals in the plan.

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

Public Service activities are aimed directly at improving the quality of life of residents in Meriden including reducing the number of families in poverty. The City and its partners provided a large number of public service activities which assisted LMI persons citywide in PY 2022. Public services for special needs groups included senior services, persons with disabilities, victims of domestic violence, and persons experiencing substance abuse. Public services for LMI persons included youth enrichment and prevention, health and mental health services, food banks, housing services, employment services and literacy programs.

The NOW Security Deposit Program and Salvation Army's Assistance Program provided immediate financial relief to families facing financial hardship that could lead immediately to housing instability and further financial peril. Eviction from housing is one of the greatest contributors to cycles of poverty, as housing instability impacts employment, childhood education and general well-being of the households affected. These programs help preclude short term financial troubles from turning into long term poverty and homelessness.

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

The Community Development Office's merger with the City's Economic Development Department helped to improve internal and external coordination and collaboration; better target CDBG awards related to housing and economic development; and increase inter-office working knowledge of the CDBG Program.

CDBG administrative funds contribute to the administration of the CDBG Program and help ensure that the City meets the statutory and regulatory objectives outlined as a condition of participation in the program. The Economic & Community Development Department staff continue to take the following actions to ensure that needed services are coordinated between the City, subrecipient organizations carrying out CDBG activities, and the public who benefit from the CDBG-funded activities:

- Post CDBG Program materials and announcements, such as the availability of the Annual Plan, CAPER, and RFP documents in the local newspaper and on the City's website [www.meridenct.gov](http://www.meridenct.gov)

- Distribute copies of all materials to the general public, non-profit organizations, and elected officials when available or requested.
- Hold one-on-one meetings with sub-recipients to discuss quarterly report accomplishments and overall programming, as needed.
- Provide referrals to appropriate City departments and local organizations, such as the Neighborhood Preservation Program and the Meriden Housing Authority.

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

The City of Meriden, the Meriden Housing Authority (MHA), local services providers and private housing developers continue to progress through coordinated efforts to provide housing, services, and economic opportunities in the City’s downtown area. Recent coordination includes the Meriden Commons development, which incorporates over 150 units of affordable housing into the area. This working relationship between the City, MHA, and social service providers continues as all work in unison to explore options that will improve the quality of life for Meriden residents.

MHA will continue to reduce the barriers to affordable housing by providing Section 8 vouchers and to provide first-time homeowner loan assistance aimed at transitioning residents from public housing into the private housing market. The City’s Economic & Community Development Department will work with developers of new rental housing construction in the targeted TOD area to ensure that historic tax credits and other state and federal programs leverage adequate affordable housing opportunities for residents.

Through the City’s Notice of Funding Application (NOFA) process, the City provides CDBG program basics, describes eligible activities and uses of funds, and target populations. The City also provides the priority needs as identified in the Consolidated Plan and program goals and objectives. While this process intended to accepted requests for proposals, each year the application process helps to build the capacity of service providers in the CDBG program.

**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 primary tool communities have for identifying contributing factors for these barriers to fair housing is the Analysis of Impediments to Fair Housing Choice (AI). The overall goal of the AI is to review and assess impediments to fair housing within Meriden. On October 15, 2020, an AI report was completed in conjunction with the 2020-2024 Consolidated Plan. This AI evaluates Meriden’s current fair housing legal status, and its and public and private fair housing programs and activities and provides recommendations for fair housing initiatives critical to ensuring equal housing opportunity within the City. The following impediments to fair housing related were identified:

- Concentration of Sub-Standard Housing
- Shortage of Public Housing Funds



- High Number of Cost Burdened Renter Households
- Lack of Vacant Developable Land
- Older Housing Stock
- Shortage of Affordable Housing
- The City Faces a Growing Aging Population

#### *Actions Taken to Address Impediments*

In PY 2022 the City took several steps to address the impediments identified in the 2020 AI. To address substandard housing the City's low/mod areas the City provided code enforcement activities that benefit these low/mod areas, as well as administer the NPP program which provided low interest loans for housing rehab. The NPP program also assisted 1 LMI households with a replaced water heater in PY 2022.

To address the shortage of public housing funds, the City works closely with the MHA to work on developments in the central downtown areas. Working together maximizes the funds being used in these areas. The City also funds Financial & Housing Classes for MHA Tenants. The project will consist of providing first-time homebuyer classes and tenant goals to become more self-sufficient and financially successful at the Meriden Housing Authority.

The City recognizes that cost burden is one of the largest housing problems in the City. This is particularly true to low-income renters. The City has worked with the Salvation Army and New Opportunities to provide emergency rental/security deposits and utility payments for LMI renters, which also helped these households avoid homelessness. This also addresses the shortage of affordable housing in Meriden.

To address the growing elderly population in Meriden, the City has made it a priority to provide vital public services to help this special needs group. The City provided funds to organizations such as Joy Unlimited, Meriden Soup Kitchen and New Opportunities. The activities include meal services, food banks, health services and elderly employment services.

## **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 Meriden's Economic and Community Development Office is responsible for the overall administration and implementation of the City's CDBG Program. The City maintains records of program accomplishments, funding spent, population served, housing units rehabilitated, and other information in the HUD-provided IDIS reporting system.

Per the requirements of 24 CFR Part 91.230, the City monitors all CDBG subrecipients and City Departments to ensure that all Plan activities are carried out in compliance with program requirements. The City evaluates the performance of each sub-grantee and City Department based on the specific milestones outlined in each project proposal. Progress towards those goals is reported on a quarterly and on an annual basis. Department staff also conducts annual on-site visits to CDBG funded Public Service Agency to ensure compliance with applicable regulations and to review progress toward goals outlined in their application for funding. The intent of these monitoring policies and procedures is to identify potential discrepancies with contract standards and program requirements before they become larger issues.

The City will continue to work with local businesses and economic development organizations to attract and retain businesses, in particular woman-owned and other minority-owned businesses. The City will also follow all Section 3 regulations as appropriate.

Comprehensive planning requirements include the development and consolidated plan process of the 5-Year ConPlan, the AAP, and CAPER. Citizen participation is a vital part of the consolidated plan process and the City will make sure to follow its HUD approved Citizen Participation Plan (CPP) which helps guide the City to gather feedback from citizens which is an essential component in identifying the priority housing and community development needs in Meriden. These priority needs form the basis of the City's Strategic Plan in the ConPlan and annual goals and activities carried out in each subsequent AAP.

The ConPlan is developed every 5 years, with identified priority needs and goals to address these needs. Each year of the 5-Year plan, the City develops an AAP which identifies the projects and activities that will address and further the goals of the plan. This plan is required to be submitted to and approved by HUD each year to receive CDBG funding annually. At the end of each AAP program year, the City will report on the accomplishments and performance of the program through the CAPER. Citizen participation is required in the development of each of these stages as per 24 CFR 91.105.

Department staff work in cooperation with other city staff, Council, and the Mayor to ensure the success of the program. Staff assists, for example, by identifying needs, advising on program guidelines, and overseeing activities funded by the CDBG program.

## **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 of Meriden follows its HUD approved Citizen Participation Plan which guides and encourages input from citizen for its CDBG program. The Economic and Community Development Office is constantly working to ensure that residents of Meriden are aware of the process and able to review and comment on decisions at their discretion.

The draft PY 2022 CAPER was noticed in the *Meriden Record Journal* and a copy of the draft was posted on the City's Economic Development and Community Development website.

**PUBLIC COMMENT PERIOD:** Citizens are invited to review and make comments on the draft CAPER. A copy of the CAPER is available in the Office of Community Development, Room 134, City Hall, 142 East Main Street, Meriden, CT 06450 as well as on the Community Development website at: <https://www.meridenct.gov/government/departments/economic-development/community-development/>. Written comments on the CAPER will be accepted for 15-days beginning **October 10, 2022 through October 24, 2022** until 4:30PM EST.

**PUBLIC HEARING:** A public hearing will be held VIRTUALLY and IN-PERSON on **October 25, 2022 at 5:00 PM EST**. This means citizens will have the ability to meet in person at the Council Chambers, Room 206 at City Hall or online via MSFT Teams meeting in real time through the internet on a computer or other electronic device. For more information on how to participate at the public hearing please call the Community Development and Grants Administrator at (203) 630-4151, or email at [jallam@meridenct.gov](mailto:jallam@meridenct.gov), or on the Community Development website as listed above.

<https://www.meridenct.gov/virtual-meetings/>

Accommodations were made for persons with a disability and non-English speakers upon request. Requests could be made to the Community Development and Grants Administrator, at the Office of Community Development address above or email and telephone listed at least 24 hours prior to the hearing if auxiliary aids were required.

## **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.**

This PY 2022 CAPER reports on the third year of the City of Meriden's 5-Year 2020-2024 Consolidated Plan (Strategic Plan) and there are currently no changes to the overall strategies identified in the Plan. The priority needs and goals continue to serve as the basis of the 5-Year Strategic Plan.

While the needs and goals remain the same, the City may identify new activities to fund that may further the already established goals of the 5-Year Strategic Plan. When those opportunities arise, the City may make adjustments to the goal outcome indicators as necessary to properly adjust for those changes in the number of persons or households assisted during the development of each AAP in the 5-Year planning period.

### *CDBG-CV*

The City also continues to monitor the effects of the COVID-19 pandemic. On the onset of the pandemic, the City received a total of \$1,045,687 in CDBG-CV grant funds to fund activities that prevent, prepare for and respond to the pandemic, and in particular to assist LMI residents during this time.

In PY 2021, the City continued to expend CDBG-CV funds towards public services for LMI residents impacted by the pandemic. These activities include technology preparedness at Franciscan Life Center Network, Inc.; communication and connectedness project at Midstate Arc; health and safety improvements at Ball Headz, Beat the Street Community Center, and Our House; supportive staff funds at Literacy Volunteers; and food programs for LMI and elderly sheltering from the pandemic at the Meriden Soup Kitchen and Middlesex Community College. The City will continue to monitor the situation and the effects the pandemic has on LMI residents and will make necessary changes if there arises a need. At this time, the City doesn't expect any changes to the goals or outcomes for CDBG-CV funds. A summary of activities has been provided in the CR-05, and a summary of expenditures has been provided in the CR-15.

**Does this Jurisdiction have any open Brownfields Economic Development Initiative (BEDI) grants?**

No

### CR-58 - Section 3

Identify the number of individuals assisted and the types of assistance provided

Total Labor Hours	CDBG
Total Number of Activities	0
Total Labor Hours	0
Total Section 3 Worker Hours	0
Total Targeted Section 3 Worker Hours	0

**Table 8 – Total Labor Hours**

Qualitative Efforts - Number of Activities by Program	CDBG
Outreach efforts to generate job applicants who are Public Housing Targeted Workers	0
Outreach efforts to generate job applicants who are Other Funding Targeted Workers.	0
Direct, on-the job training (including apprenticeships).	0
Indirect training such as arranging for, contracting for, or paying tuition for, off-site training.	0
Technical assistance to help Section 3 workers compete for jobs (e.g., resume assistance, coaching).	0
Outreach efforts to identify and secure bids from Section 3 business concerns.	0
Technical assistance to help Section 3 business concerns understand and bid on contracts.	0
Division of contracts into smaller jobs to facilitate participation by Section 3 business concerns.	0
Provided or connected residents with assistance in seeking employment including: drafting resumes, preparing for interviews, finding job opportunities, connecting residents to job placement services.	0
Held one or more job fairs.	0
Provided or connected residents with supportive services that can provide direct services or referrals.	0
Provided or connected residents with supportive services that provide one or more of the following: work readiness health screenings, interview clothing, uniforms, test fees, transportation.	0
Assisted residents with finding child care.	0
Assisted residents to apply for, or attend community college or a four year educational institution.	0
Assisted residents to apply for, or attend vocational/technical training.	0
Assisted residents to obtain financial literacy training and/or coaching.	0
Bonding assistance, guaranties, or other efforts to support viable bids from Section 3 business concerns.	0

Provided or connected residents with training on computer use or online technologies.	0
Promoting the use of a business registry designed to create opportunities for disadvantaged and small businesses.	0
Outreach, engagement, or referrals with the state one-stop system, as designed in Section 121(e)(2) of the Workforce Innovation and Opportunity Act.	0
Other.	0

**Table 9 – Qualitative Efforts - Number of Activities by Program**

## **Narrative**

On October 29, 2020 HUD made effective the Final Rule, which set new benchmarks for Section 3 under 24 CFR 75. Section 3 helps to establish more economically sustainable communities by ensuring that employment and other economic opportunities generated by Federal assistance for development programs are directed towards very low- and low-income persons to the greatest extent possible, and in particular to those who are recipients of the Federal assistance. The Final Rule changes tracking the number of qualified new hires in Section 3 projects, to tracking the total labor hours worked.

As applicable to the City of Meriden, the benchmark for Section 3 workers was set at 25 percent or more of the total number of labor hours worked by all workers on a Section 3 project. The benchmark for Targeted Section 3 workers was set at 5 percent or more of the total number of labor hours worked by all workers on a Section 3 project.

Section 3 Projects cover housing rehab/construction and public improvement construction activities assisted under HUD grant programs that provide housing and community development financial assistance that exceeds a threshold of \$200,000. A \$100,000 project threshold applies to grants under HUD's Lead Hazard Control and Healthy Homes programs. In PY 2022, the City had no activities that met the threshold as defined for a Section 3 project. The Section 3 report has been uploaded to the CR-00 as confirmation.