

**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.

This document serves as the City of Orange's 2019, Year 1, Comprehensive Annual Performance and Evaluation Report (CAPER) for the Community Development Block Grant (CDBG) program. This report is submitted in response to the performance requirements described in the Consolidated Plan regulation at 24 CFR 91.520.

CDBG funds assisted 404 people through Public Services. Code Enforcement helped reduce crime and reduced blighting in the City's local CDBG strategy area, creating a better living environment for 12,805 individuals or over 3,000 households.

The City of Orange routinely spends 100% of its CDBG funds on activities benefiting low income individuals and families, activities which include not only those listed, but also Fair Housing activities and technical assistance and training.

The City of Orange has been the recipient of Disaster relief funds from Housing and Urban Development for the Covid 19 Pandemic.

Due to other natural disasters such as Hurricane Harvey and Hurricane Imelda, the city is now in the process of rebuilding with grants for hazard mitigation and emergency management to assist the city as well as its residents.

**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.

**Table**

**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.**

The City continues to make a significant portion of the federal grants available to programs and activities that directly benefit low income residents with health and human services. This will help people achieve self-sufficiency and thereby break the poverty cycle. These services include nutrition, education, after school tutoring, GED preparation, tax services, entrepreneurship training, career guidance, financial management, literacy tutors, English as a second language, speech therapy, physical therapy, occupational therapy, hippotherapy, therapeutic riding, senior services, meals on wheels, mental health counseling, health services and palliative care for indigent individuals who have fallen through the cracks. By leveraging CDBG funding with other funding sources, the City gets a good return on human investment. Additionally, Code Enforcement assisted in the reduction of crime and in the demolition of substandard housing. These steps will enhance low income neighborhoods.

The service Community works well together to serve the low-income population of our city. Other organizations and entities not funded with CDBG, partner with the City's Community Development Block Grant Program to assist in serving the residents of Orange and achieving the goals of the Consolidated Plan. The Housing Authority City of Orange (PHA), Putnam House (Section 811 housing), Spindletop MHMR (Section 811 Housing), Heritage Center (Section 202 Housing) and Optimist Village (Section 202 Housing) along with our nonprofit organizations such as Neighborhood Development Corps., Homeless to Homes project funded through the Continuum of Care are the major contributors.

## **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)**

	<b>CDBG</b>
White	620
Black or African American	229
Asian	7
American Indian or American Native	0
Native Hawaiian or Other Pacific Islander	2
<b>Total</b>	<b>858</b>
Hispanic	87
Not Hispanic	771

**Table 1 – Table of assistance to racial and ethnic populations by source of funds**

## **Narrative**

Public Services also known as health and human services assisted 692 people. Of the 692 people served with CDBG funds, 14 people were Hispanic, and 678 people were non-Hispanic. 400 people were extremely low income, 152 people low income, 140 people were of moderate income. Code Enforcement served the local CDBG strategy area which is made up of 3,202 households with a low/mod ratio of 52.13 percent.

The City of Orange utilizes a Police Officer as a Code Compliance Officer. This assists in code compliance and the police presence assists in reducing crime in the area. This officer serves the local CDBG strategy area serving 12,805 residents or 3,202 households.

The local CDBG strategy area consists of Census Tract 202 and 203, all block groups and block groups 2, 3 and 4 in Census Tract 207 and block groups 1, 2, 3 and 4 in Census Tract 209.

### **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	631,961	326,436

**Table 2 - Resources Made Available**

#### **Narrative**

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

Target Area	Planned Percentage of Allocation	Actual Percentage of Allocation	Narrative Description
CDBG Strategy Area	67	97	67 % of funds were allocated to the local CDBG strategy area, however, 97% of the people served.

**Table 3 – Identify the geographic distribution and location of investments**

#### **Narrative**

The local CDBG strategy area consists of all block groups in census tracts 202 and 203 and block groups 2, 3 and 4 in census tract 207 and block groups 1, 2, 3 and 4 in census tract 209, Orange County, Texas. This area, according to the U S Department of Housing & Urban Development's Independent Disbursement & Information System is 52.13 percent low/mod and provides a large area for revitalization.

The City of Orange utilizes all information available to assist in creating a strategic plan that targets low- and moderate-income residents. Utilizing all resources available, CDBG partners with other agencies to provide a variety of services and housing opportunities and to create a safe and better living

environment for its low-income residents.

### **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.**

The City uses all available funds and partners with local nonprofit agencies, private for-profit developers and contractors and other state and local funds to meet the needs of the Orange community and its citizens.

The City does use City resources as well as seeking partnerships and funding opportunities to stretch federal grant dollars to achieve maximum benefit for its low- and moderate-income residents. At this time, there are no projects planned which would benefit from the use of publicly owned land or property.

### **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.**

	<b>One-Year Goal</b>	<b>Actual</b>
Number of Homeless households to be provided affordable housing units	240	0
Number of Non-Homeless households to be provided affordable housing units	464	0
Number of Special-Needs households to be provided affordable housing units	114	0
<b>Total</b>	<b>818</b>	<b>0</b>

Table 4 – Number of Households

	One-Year Goal	Actual
Number of households supported through Rental Assistance	1,086	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
<b>Total</b>	<b>1,086</b>	<b>0</b>

**Table 5 – Number of Households Supported**

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

The City does not have any housing activities in its Annual Action Plan for Community Development Block Grant, but does, however, partner with the Housing Authority City of Orange (PHA) who administers Public Housing and the Section 8 Voucher Program. The Housing Authority City of Orange is not administered by the City. The Housing Authority City of Orange's goal for number of households supported through rehab of existing units was 84 and Housing Authority reported 0. In the past the city reported PHA numbers in the table above, PHA officials have not yet reported those figures at the time of this report. They receive their own funding and maintain their own properties that are owned solely by the Housing Authority City of Orange. The Neighborhood Development Corp., (NDC) administers the Homeless to Homes program, has 10 units for permanent supportive housing. NDC is funded through the South East Texas Regional Planning Commission and the Balance of State and is part of the Continuum of Care. Putnum House, a Section 811 housing facility, has 19 separate independent living units for those who are mentally ill. Spindletop MHMR (MHMR) a Section 811 housing facility has 12 units for independent living, the bedrooms are individual, and the living area is shared. MHMR's units are designated for those with a diagnosis of mental health, mental issues, but may carry a secondary diagnosis such as substance abuse. Heritage Center a Section 202 housing facility has 54 units to serve low income elderly and 6 units to serve disabled/special needs. Optimist Village is a Section 202 housing facility and has 80 units to serve low income elderly and 10 units to serve disabled/special needs.

The City receives no Emergency Shelter Grant funds. Through its Public Services, the City has allocated \$8,000.00 to Orange Christian Services for emergency rental, mortgage and utility assistance to assist low income citizens and to help avoid foreclosure and eviction. Through partnering with Neighborhood Development Corp., the Housing Authority City of Orange and The Sharing Station, Pinehurst, the City works diligently to house the homeless. To feed the homeless and those needing assistance with food, the local Churches have worked together to provide a hot meal for lunch, seven (7) days a week, 365 days a year. This year, the city was hit with another setback, Covid-19. Funds were made available through CARES ACT FUNDING. Funds were given to Orange Christian Services to help those affected by Covid-19. Funds were also given to Orange Community Action Association to assist seniors in getting food and to ensure that their building was safe from Covid-19. A new non-profit, James Hope Center for Children was established, and funds were allotted to them to help the homeless in our city. They provided PPE and gave CDC guidelines to prevent the spread of Covid-19 among the homeless.

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

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

With Covid-19 still being new and unknown how it will impact our city long term, our future annual action plans will reflect this pandemic and its affects on the city. Also, due to recent Hurricanes, Laura and Delta, it is not known yet how our population will be affected. It could decrease with people leaving the area, or it could increase with people from other cities moving to our city.

Working with our local public service organizations, we will get a better picture of how these events will impact our city and will adjust our plans for the future accordingly.

**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	4	0
Low-income	168	0
Moderate-income	116	0
<b>Total</b>	<b>288</b>	<b>0</b>

**Table 6 – Number of Households Served**

## **Narrative Information**

CDBG does not have any housing activities in its Annual Plan. However, the numbers listed under CDBG are for individuals served by Julie Rogers Gift of Life Program, and by Stable Spirit, both Public Service agencies. These activities are not housing activities, not presumed benefit under regulations found at 24 CFR 570.208. Neither of these serving low income individuals that are inclusive of a Low/Mod area. Stable Spirit and Julie Rogers Gift of Life Program qualify their CDBG sponsored clients under HUD income limit guidelines to determine their eligibility. Income verification is kept on file by the nonprofits.

The HOME numbers reflect assisted units that are in their “affordability” period. The City of Orange served as the Responsible Entity for the Orange Regional HOME Consortium from 2004 through 2011. The HOME units are considered floating units and income verification is kept on file by the property managers. The City of Orange uses Risk Management and Monitoring documentation that has been approved by HUD and adopted by the Orange City Council for both CDBG activities and HOME units. All HOME multifamily complexes utilized HOME funds from Orange Regional HOME consortium, Low Income Housing Tax Credits and State HOME funds.

**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**

Our city supports and works the existing Neighborhood Development Corp. They are a non-profit providing permanent housing and supportive services to homeless individuals with disabilities. A new non-profit has established itself in Orange. James Hope Center for Children, formally in Port Arthur, is not housed in Orange and assisting homeless individuals. They have been driving through the city handing out backpacks with essentials and personal hygiene items, along with non-perishable food. They are working on equipping their building with beds and showers to assist homeless individuals and work on permanent housing plans. They are also handing out CDC guidelines on how to prevent the spread of Covid-19.

We work with the Homeless Coalition of South East Texas who coordinates the Point in Time homeless count.

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

The City of Orange does not have an emergency shelter for the homeless. The Salvation Army will open its doors on a limited basis as a warming station in extreme cold weather.

The James Hope Center for Children is hoping to have a place for the homeless to stay in extreme weather conditions, however they are not equipped for this at this time.

The Neighborhood Development Corp. is the only true homeless to homes program that we have at this time. Orange Christian Services will offer emergency rental assistance to those being threatened with becoming homeless due to lack of funds.

James Hope Center for Children is a new non-profit and is dealing specifically with the homeless in our city. They are offering food, hygiene products, and information from the CDC to prevent the spread of Covid-19.

**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**

The City is working with Neighborhood Development Corp., Spindletop MHMR, North Early Learning Center and Texas Workforce to disseminate information on services and supportive services provided to

those being discharged from publicly funded institutions and systems of care. James Hope Center for Children is offering clothing, food and will eventually have shelter for those homeless individuals being discharged from the above-named facilities.

The city will continue to support those organizations that continue to assist low income families in order to prevent them from becoming homeless. City staff often provides information to nonprofits concerning coordination efforts that might assist in the provision of services. City staff also informs area non-profits of any training opportunities that become available to assist low income families and those on the verge of becoming homeless.

Organizations such as Red Cross and Salvation Army assist those in an emergency homeless situation such as house fires, or floods, but do not operate a shelter in Orange. The Women and Children's Shelter of Southeast Texas funded through Family Services of Southeast Texas will assist those with domestic abuse who want to leave their abusing spouses, but they must be willing to relocate to Beaumont or Jasper for services. Friends helping Friends, Jackson Community Center and Greater Orange Area Literacy services along with Samaritan Counseling all provide supportive services to those who provide housing opportunities to the homeless or those who are at risk of becoming homeless.

**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 City does not receive Emergency Solutions Grant Funds and has only one agency working directly with the homeless; however, the City funds nonprofits supplying supportive services that help achieve self-sufficiency. Along with the agencies that provide permanent supportive housing, several nonprofit agencies provide services that assist in becoming self-sufficient. Agencies such as Greater Orange Area Literacy service provide tutoring, English as a second language and GED preparation. Jackson Community Center provides services for emancipated youth along with financial management education. The Housing Authority City of Orange has a self-sufficiency program for its residents. Texas Workforce Solutions has programs such as Project Rio to assist individuals coming out of incarceration. There are not any programs in our area specifically targeting veterans; however, Lamar State College Orange markets federal assistance for veterans covering all chapters of the GI bill and the Hazelwood exception. Stable Spirit provides a program of counseling through experiential learning and therapeutic riding to help veterans experiencing PTSD and with transition issues from soldier to citizen. The client served with CDBG funds, providing for Therapeutic Riding is a veteran. The churches in Orange have coordinated their efforts to provide homeless and low-income residents at least one hot meal a day, 7 days a week, 365 days a year. These "soup" kitchens have about 35 - 70 attendees daily. The Red Cross of Orange, City of Orange, Neighborhood Development Corps., and other nonprofit agencies put on the Texas Stand Down to provide information and services to homeless veterans.

Orange Christian Services receives a limited amount of CDBG funding to provide emergency funds for utility payments and rental assistance to prevent eviction and homelessness or the threat of homelessness. They can also use this limited funding for mortgage assistance to prevent foreclosure and the threat of homelessness.

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

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

The Housing Authority City of Orange (OHA) continues to work on goals set forth in the Annual Action plan. OHA shall continue to maximize the number of affordable units available to the Housing Authority within its current resources by continuing to maintain or increase section 8 lease-up rates and by establishing payment standards that will enable families to rent throughout the jurisdiction. OHA will continue to undertake measures to ensure access to affordable housing among families assisted by OHA regardless of unit size required. OHA will continue to maintain or increase section 8 lease-up rates by effectively screening Section 8 applicants to increase owner acceptance of program. OHA will continue to participate in the Consolidated Plan development process to ensure coordination with broader community strategies.

The Housing Authority will continue to target available assistance to families at or below 30% AMI by exceeding HUD federal targeting requirements for families at or below 30% AMI in public housing, by exceeding HUD federal targeting requirements for families at or below 30% AMI in tenant-based section assistance and by adopting rent policies to support and encourage work.

The Housing Authority will continue to target available assistance to families at or below 50 percent AMI by adopting rent policies to support and encourage work.

The Housing Authority will continue to target available assistance to the elderly by seeking designation of public housing for the elderly.

The Housing Authority shall continue to target available assistance to Families with Disabilities by affirmatively marketing to local nonprofit agencies that assist families with disabilities.

The Housing Authority will continue to increase awareness of PHA resources among families of races and ethnicities with disproportionate needs by affirmatively marketing to races/ethnicities shown to have disproportionate housing needs.

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

The Housing Authority City of Orange has discontinued its Section 8 homeownership program. The new

housing units are operating like small communities, with each implementing their own self-sufficiency programs and training programs. Many of these programs will utilize and involve nonprofit organizations, such as Jackson Community Center and Greater Orange Area Literacy Program.

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

The Housing Authority City of Orange is considered a troubled agency. The following notes its progress at meeting its Mission and Goals:

Ongoing training has been provided to housing management. Ongoing training has been provided to voucher management.

The Agency now has a web page that provides online application, available housing list, income limits, payment standards, utility allowance and waiting list status. OHA's Facebook page includes updates and/or upcoming events.

Capital Funds have been and are being utilized to upgrade and maintain public housing.

The City of Orange assists the Orange Housing Authority with appointing its board, certifying its environmental reviews and after review, certifying their activities as consistent with the City's Consolidated Plan. The Housing Authority City of Orange owns its own properties, manages its own properties, receives its own separate allocation of funds and conducts its own banking.

The Housing Authority City of Orange works with the City of Orange in the planning of the Consolidated Plan and with addressing housing needs and fair housing issues within the City.

### **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 Orange has been proactive in providing affordable housing to its residents. The City of Orange has supported agencies such as Habitat for Humanity with infrastructure on their properties to support affordable housing and Habitat for Humanity is provided free permits for building. When Habitat for Humanity originally purchases the land for building a subdivision, the City, in the past, used CDBG funding to assist with infrastructure. The City supports, encourages and partners with agencies that provide permanent housing and supportive services to the homeless. The General Land Office has also provided housing for those affected by Hurricane Harvey. The city has worked with the GLO on permits and building codes for the houses and made sure they were elevated so as not to flood again.

The City does not have any policies, statutes or regulations which unduly impede the development or maintenance of affordable housing. The City's zoning ordinances, building codes and code enforcement are designed to promote safe and decent housing in safe and stable neighborhoods throughout the City.

A new Analysis of Impediments was performed in 2019 and used to generate the City's new 5 year consolidated plan. The Planning Department reviews the ordinances regularly. The City continues not only to work with the Citizens Advisory Committee, but also with Delta Sigma Theta to assist the City in identifying Fair Housing Actions to address and to conduct outreach to educate citizens and organizations on Fair Housing rights. City Staff continues to sit on the Board of the Fair Housing Coalition of Southeast Texas and participate in the planning and coordination of the annual South East Texas Fair Housing Conference. City staff also participates in the planning and coordination of the Texas Stand Down annually and is an active member of the Homeless Coalition of South East Texas.

The City utilizes a Police Officer as a Code Compliance Officer, who works in the CDBG strategy area. This provides a police presence to reduce crime and the officer works well with the citizens to keep their properties clean. She is proactive in working with the citizens to keep their properties off of the demolition list. She also works with those who have experienced problems in getting their properties rehabilitated after the floods and/or for financial reasons cannot meet deadlines set by the court. She will work to find a competitive demo price for the owner so they can avoid a lien on their property. The Code Compliance Officer also provides technical assistance to property owners who need assistance in what their options are so they can make the best decisions concerning their properties.

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

Domestic violence issues are served by the Women's and Children's Shelter in Beaumont, a program carried out through Family Services of Southeast Texas. In order for needs to be met, individuals must be willing to shelter in Beaumont or Jasper.

Court Appointed Special Advocate, or CASA, is a nonprofit organization, provides a powerful voice and a meaningful connection for children who have experienced abuse, neglect and abandonment. Volunteers meet with children and then become their voice in the court systems to advocate for the child. The City supports them in meeting this need.

The Gulf Coast Clinic provides medical services, dental services and mental counseling to indigent persons in Orange. Triangle Area Network (TAN) provides medical services, pharmacy services, mental health services and patient navigation on a sliding scale. TAN has offices in Beaumont and Orange and provides transportation to those who need assistance with getting to the Dr. Julie Rogers Gift of Life program provided mammograms to medically underserved women through free mammograms at Baptist Hospital of Orange. Julie Rogers Gift of Life Program also provided free prostate screenings along with other health screenings to medically underserved and indigent men.

Orange Christian Services serves the no to low income with food staples, clothing, utility assistance, emergency payments for rent and/or mortgage and other monetary needs, provided as funds are available. Orange Christian Services works on donations and a very small amount of CDBG funding.

Lone Star Legal Aid provides free legal assistance with civil issues. They do not litigate criminal cases but do provide assistance with most civil actions to low income individuals. Services include probate of property and assisting with possible eviction cases. Services are provided in Orange through an

outreach project partnering with the City.

Stable Spirit provides equine assisted psychotherapy, hippotherapy, therapeutic riding, speech therapy, physical therapy, occupational therapy and experiential learning. Focus is in providing services to youth and veterans transitioning from soldier to citizens and veterans who experience PTSD.

James Hope Center for Children offers food, clothing, and hygiene items to those that are homeless. They also provide information from the CDC on how to prevent the spread of the Corona Virus. They are currently working on making their building a shelter for homeless individuals.

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

An important initiative emanating from HUD in the last decade is the reduction of lead-based paint hazards and many jurisdictions around the country have focused a concerted effort to reach this goal. The federal residential Lead-Based Paint Hazard Reduction Act of 1992 (Title X of the Housing and Community Development Act of 1992) amends the Lead-Based Paint Poisoning Prevention Act of 1971, which is the law covering lead-based in federally funded housing. These laws and subsequent regulations issued by the U. S. Department of Housing and Urban development (24 CFR Part 35) protect young children from lead-based paint hazards in housing that is financially assisted or being sold by the federal government. For all State or Federally funded residential renovation and rehabilitation projects where construction occurred prior to 1978, testing is done to assess whether lead-based paint is present. If lead-based paint is present, then the guidelines set forth in the Residential Lead-Based Paint Hazard Reduction Act of 1992 (Title 24, Part 35 of the Code of Federal Regulations) are followed. City staff contacts the County Health Nurse twice a year to see if any documented cases of elevated lead in young children occur. This past year, no documented cases of elevated lead in young children was present according to the Orange County Health Nurse.

The City will continue to consult with local health providers to see that lead-based paint does not become a health issue. The City will continue to meet HUD lead-based paint abatement standards in any planned housing rehabilitation activities planned or undertaken. The City will continue to expand the stock of lead safe housing units to the fullest extent possible.

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

The City of Orange partners with nonprofit organizations that provide supportive services to poverty-level families.

Neighborhood Development Corp. provides permanent supportive housing and supportive services to homeless with a disability. It is strongly encouraged that those living in the units try to continually better themselves through work, education and other supportive services such as financial management to break through the poverty cycle.

Greater Orange Area Literacy Services provides literacy services to those reading at or below a sixth-grade level, math tutoring, GED instruction and preparation and English as a second language.

Jackson Community Center provides life skill training, career building, after school tutoring, financial management and entrepreneurship training. They began their nonprofit to assist emancipated youth to break the poverty cycle through education and have expanded their services to assist others. Jackson also offers free tax preparation to elderly and low income in their service area through VITA.

Senior Community Service Employment Program (SCSEP) is an organization that helps seniors find employment and gives them job training while paying their salaries. They have several seniors employed at various non-profits in our city. This allows seniors to supplement their social security.

The Housing Authority City of Orange assists no to low income persons with affordable housing through public housing and the section 8 voucher program. The Housing Authority carries out a self-sufficiency program for its residents.

North Early Learning Center provides preschool education to children of poverty level families. North Early Learning Center is Orange County's Headstart Program. Families are qualified by income and must meet strict poverty guidelines in order to receive services. Slightly over 85% of the children attending North Early Learning Center are from the City of Orange. Education is one of the greatest tools to break the cycle of poverty.

The City strongly recommends the hiring of section 3 individuals and utilization of Section 3 businesses with any CDBG contract, regardless of the dollar amount. At each pre-Bid meeting, Section 3 is explained, and material provided. At each Pre-Construction meeting Section 3 is again explained and information is provided along with contact numbers to the Section 3 Coordinator with the Housing Authority City of Orange and the Texas Workforce Commission. Section 3 self-certification forms are given to each contractor and they are required to report on section 3, regardless of the dollar amount of the contract.

James Hope Center for Children is a new non-profit to our city. They are focusing on aiding the homeless in our city. They provide food, clothing, and personal hygiene products for the homeless. They are working on having a shelter for individuals until permanent housing can be obtained.

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

The City partners and works with nonprofit organizations, both funded with Community Development Block Grant dollars and those not funded through CDBG.

The City offers its Neighborhood Meeting Room to nonprofits free of charge for meetings and training. The Neighborhood Meeting Room has its own WiFi, projector, screen and cable. Tables and chairs are provided. The room has a sink, cabinets and hot & cold running water. Additionally, the room is temperature controlled with its own thermostat in the room. The room is available evenings and weekends.

The City also partners with Entergy Texas to provide a meeting for the nonprofits to network, thus getting to know who is doing what to take care of who in our area. This encourages partnerships for services to low income individuals and families as well as promotes knowledge of services offered. The

meetings take place quarterly. City staff also attends the low-income summit. Services such as weatherization and free energy use assessment for low income individuals and families are offered in our area.

The City utilizes a Citizens Advisory Council (CAC) to make funding recommendations to City Council for Public Services. CAC members are appointed by City Council. They receive a copy of the funding applications for Public Services. Members visit nonprofit organizations, interview nonprofits that seek funding and make recommendations for funding which are forwarded to City Council in the form of a motion. CAC members also visit nonprofit agencies that are not funded with CDBG to see if they would be a good funding effort, often leaving that organization an application. This keeps CAC members abreast of nonprofits operating in the area as well as services that are available. This also helps with avoiding a duplication of services in the funding process.

Citizens Advisory members also review the Analysis of Impediments to recommend fair housing practices or alert City staff to any concerns. The CAC and Delta Sigma Theta are wonderful participants to assist the City with the “citizens” concerns for Fair Housing.

The City serves on the Board of the Fair Housing Coalition of Southeast Texas and partners with Delta Sigma Theta, the Housing Authority City of Orange and the Citizens Advisory Committee to work on Fair Housing goals, outreach and education. The City is also proactive in seeking out training that would enhance the Fair Housing efforts throughout the jurisdiction. The City has Fair Housing Brochures providing a brief explanation of what Fair Housing is and who is covered along with the contact information for HUDs Discrimination Hotline and the City’s Fair Housing official. The City participates in the Fair Housing Conference held during April each year. Delta Sigma Theta and the City work with the Black Ministerial Alliance and the NAACP in distributing the information to members and placing posters and brochures around the City. The City of Orange publishes a Fair Housing notice in the Orange Leader during the month of April in advance of the Fair Housing Conference.

The City will continue to offer interpretive services when requested at City Council meetings, public hearings, and any time that citizens request City services. City staff will continue to produce fliers in Vietnamese and Spanish and post where English as a second language classes are held in order to reach out to those with limited English proficiency.

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

The City continues to pursue all funding opportunities that provide assistance to public and private agencies and other public service providers. The City continues to provide technical assistance, assist in securing other funding sources (federal and non-federal) and break down barriers in an effort to streamline the processes and increase local coordination efforts.

City Staff works with Neighborhood Development Corp and with the Housing agencies and other local agencies in the coordination of the Point in Time Homeless count.

The City of Orange is a close community, working together, combining the efforts of public housing, nonprofits, for profits, education facilities and churches to serve the needs of our area.

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

The Analysis of Impediments to Fair Housing was adopted by the Orange City Council in January 2015 and has been reviewed each year since. It is reviewed for any strengths or weakness or issues needing addressed and not covered. Another analysis was conducted in 2019 and was considered in our new consolidated plan.

The City is a founding member of the Fair Housing Coalition of Southeast Texas. The City partners with Delta Sigma Theta to conduct Fair Housing outreach and education in the City of Orange. Delta Sigma Theta and the City work with the Black Ministerial Alliance and the NAACP in distributing the information to members and placing posters and brochures around the City. The City endeavors to meet the needs of those with limited English proficiency. Orange does have a Hispanic community that is rapidly growing along with an Asian presence. The city will continue to encourage and assist in diversifying minority concentration by assisting the Housing Authority City of Orange in locating Public Housing complexes in non-low-income areas.

**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 Orange uses a varied approach to assure compliance of its contractors and subrecipients. All Public Service applications are checked by City Staff to assure eligibility and completeness. A copy of all applications is given to the Citizen Advisory Committee (CAC) members. The applicants have the opportunity to address the CAC in a separate second meeting. During that meeting, the CAC can also question the applicants. In another separate or third meeting, the CAC discusses the applications and recommends funding to City Council.

Once approved by City Council, all nonprofits must file a disclosure statement of interested parties with the State of Texas Ethics Commission, the approved budget is published, and Public Hearings are scheduled for citizen comments. At this time, the Annual Action Plan is prepared, and a draft form is available for copy and public hearings. The Annual Action Plan is then taken to City Council for formal adoption. Before a contract can be executed, staff checks the State Comptroller's Office Debarment list, the federal System Award Management (SAM) to assure they are active and have no exclusions and the LDPS list for entities limited in participation in government contracts. For Contractors, the invitation to bid is published twice, a pre-bid meeting is held to inform Contractors of regulatory requirements, including but not limited to Davis Bacon and related acts and Section 3. After Bid opening the Contract is prepared, required forms are gathered, and debarment is checked the same way that debarment is checked with Public Services and the Contract is taken to City Council for approval. Before the

Resolution is issued, the Contractor must file and Interested Party Statement with the State of Texas Ethics Commission. Once all the forms are in and the Resolution provided, a Pre-Construction meeting is held to provide signage, posters, locked in wage decision, Section 3 reporting forms and reporting requirements.

Each draw is desk monitored against the contract. Any inconsistencies are addressed and corrected before payment is made. For Public Services, all contracts are on a reimbursement basis. For Contractors, all certified payrolls must be current and the Division Manager overseeing the project must sign that the payment may be released.

All Public Services agencies are monitored annually utilizing the approved Risk Management Monitoring forms. The HOME projects in the “affordability” period are also monitored annually.

#### **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.**

Public Hearings are routinely held during regularly scheduled meetings of City Council, at the Enrichment Center, Orange Senior Center and the Neighborhood Facility Meeting Room, all located in the local CDBG Strategy Area. City Council meetings are also available for citizens to view on their computers by going to the City webpage at [www.orangetexas.net](http://www.orangetexas.net). They are recorded on You Tube and streamed for the citizens viewing pleasure.

Public Hearings are held for the development of the Annual Action Plan and to receive comments on the draft Annual Action Plan before submitting to the U. S. Department of Housing and Urban Development (HUD) for approval. Public Hearings are held for Citizens to review HUD's findings after review of the CAPER or the Annual Community Assessment sometimes called the Year End Report. Additionally, the Annual Assessment or Year End report is sent as an “Interested Party” communication to the Mayor and City Council, Nonprofits, CAC, and others identified as Interested Parties. The receipt of this report or assessment is published in the Orange Leader and is available to the public for viewing or copying at the Orange Public Library and the Department of Planning and Community Development.

The City's Social Media Coordinator is responsible for the City's media presence. Social media is one avenue Citizen Participation is promoted as well as services to low income citizens and to notify citizens of meetings. Social media was also utilized for Covid-19, Hurricane Laura and other emergency events to update the citizens on emergency management efforts. Currently City of Orange, Texas-Government, the City's Facebook Page, has 9,718 followers at the time of this report.

Public Hearings are conducted for environmental reviews on projects located in the floodplain, and for Site Specific environmental clearance of residential structures identified as substandard and proposed for demolition located in the floodplain. During that same public hearing, addresses of properties over 45 years of age are read to the public that might be considered historical in nature and have been identified as substandard and proposed for demolition located in the floodplain. These public hearings are scheduled during regular City Council meetings. The local Historical Preservation Board also meets

and any structure that is 45 years or older is brought before the board to assure that any historical significance is not overlooked. The owners are notified of Historic Preservation meetings and encouraged to attend. Every effort is made to assure public participation, but sadly, not many citizens avail themselves of this opportunity. All written comments as well as oral comments, if address and name can be obtained, are answered in writing. Any follow-up is also forwarded to the individual providing the comment. All written comments are included in the submission that it corresponds to i.e., Annual Action Plan, CAPER, etc. A copy of the Five-Year Consolidated Plan, Annual Action Plan, CAPER and Community Assessment or Year End Report by HUD can be found in the Orange Public Library for viewing. Additionally, copies are placed in the Foyer of the office of Planning & Community Development during report periods. Copies of items listed above along with the Environmental Review Records are available for viewing and copying in the Department of Planning and Community Development.

### **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.**

The City of Orange did not experience any National Objective failures in or with any project or activity.

The City was directly impacted by five hurricanes and Covid-19 pandemic in the past decade and has taken advantage of disaster relief funds to recuperate from those storms and the pandemic to revitalize areas most affected.

The CDBG funds have been used to find housing for those that lost their homes due to hurricanes. The General Land Office also used funds to rebuild homes at a higher elevation for those homeowners who qualified.

Cares Act Funding provided relief to agencies by allotting funds for rental assistance, utility assistance, PPE supplies, and air filtration systems to ensure public safety.

**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

