

**FY 2018 CDBG and HOME Annual Action Plan**  
**City of Columbia**

# Executive Summary

## AP-05 Executive Summary - 24 CFR 91.200(c), 91.220(b)

### 1. Introduction

The U.S. Department of Housing and Urban Development (HUD) defines the City of Columbia as an entitlement community due to its population and demographics. As an entitlement community, the City of Columbia receives an annual allocation of Community Development Block Grant (CDBG) and HOME program funding. The City of Columbia is required to submit an Annual Action Plan identifying community needs and funding priorities, in order to receive annual funding. The City of Columbia also values the importance of strategic planning when implementing the use of public funds. This Annual Action Plan is for program year 2018 and will become effective retroactively to January 1, 2018. CDBG and HOME funding allocations were level at about \$830,000 per year for CDBG and \$435,000 for HOME; however this year's federal budget includes a significant increase for both programs. CDBG realized a %10 increase in funding and HOME received a 43% increase. So far, the House of Representative's budget for FY 2019 includes maintaining all of the CDBG increase and a portion of the HOME funding increase.

### 2. Summarize the objectives and outcomes identified in the Plan

The City of Columbia undertook a significant public input and planning process during the year leading up to the submission of its 2015-2019 Consolidated Plan. Public input was obtained through community focus groups, citizen surveys and public hearings. The objectives and outcomes identified in the plan are a direct result of priority needs identified by the public. Citizens were asked to identify priority needs in five categories including economic development, affordable housing, fair housing, neighborhood needs and community facilities. The City also obtained significant public input through 6 public hearings and community need survey update pertaining to FY 2018 funding priorities. The City obtained responses from 319 individuals through the FY 2018 Community Development Needs Survey, which represents a steady annual increase in public responses.

All objectives and outcomes identified in the plan will meet a national objective identified by HUD through providing decent affordable housing, creating suitable living environments and improving economic opportunity. This plan includes 16 production goals (deliverables) to ensure the most critical needs or highest priority needs are being addressed. The City of Columbia identified the following 16 production goals or objectives as a part of the 2015-2019 Consolidated Plan:

#### 2015-2019 Consolidated Plan Goals

1. Provide vocational training to 70 participants, particularly low-income youth.
2. Provide microloans to 15 small businesses with at least 51% low to moderate income employees.

3. Provide comprehensive rehabilitation to 50 owner-occupied housing units.
4. Provide minor home repairs to 200 owner-occupied housing units.
5. Fund 1/2 FTE of a position to conduct code enforcement.
6. Provide homebuyer assistance in the form of down payment assistance to 65 eligible households.
7. Provide homebuyer education to 450 new homebuyers.
8. Construct 15 new affordable, energy efficient owner-occupied housing units with universal design features.
9. Provide development financing for 2 affordable housing developments funded through the Missouri Housing Development Commission.
10. Complete 5 infrastructure projects to increase neighborhood connectivity to amenities and services.
11. Construct 5 new bus shelters in the CDBG eligible area.
12. Remove 15 dilapidated structures within the NRT area.
13. Provide outreach and education to 150 low-income households regarding fair housing rights.
14. Provide fair housing education to 75 housing professionals.
15. Provide fair housing counseling to 50 low to moderate income renters.
16. Acquire, renovate, or expand 5 community facilities providing services to youth, homelessness, ex-offenders, and mental health.

FY 2018 CDBG Funding Allocations are follows:

<b>Entity</b>	<b>Activity</b>	<b>Funding Amount</b>
City of Columbia	NRT Code Enforcement	\$30,000
City of Columbia	Demolition & Acquisition Program	\$54,055
City of Columbia	Rehab and Repair	\$194,880
City of Columbia	Homebuyer Education	\$9,717
Services for Independent Living	Minor Home Repair and Accessibility	\$119,350
City of Columbia	Garth, Sexton, Oak and Lynn Sidewalks	\$80,000
Job Point	Facility Purchase	\$85,945
CMCA	Worley Head Start	\$85,000
Show-Me Central Habitat for Humanity	Brown Station Road Development	\$85,000
City of Columbia	Fair Housing	\$14,000
City of Columbia	Administration	\$100,000
City of Columbia	Planning	\$66,379
<b>Total FY 2018</b>		<b>\$924,326</b>

<b>CDBG Carry-over Funding Reallocation</b>		
Wilkes Blvd United Methodist	Homeless Day-Center	(\$50,000)
City of Columbia	Garth Sexton Bioretention	(\$95,000)
City of Columbia	Bus Shelters	(\$84,964.11)
Job Point	Facility Purchase	\$164,055
Family Health Center	Facility Renovations	\$15,909
City of Columbia	NRT Demolition	\$34,500
City of Columbia	Rehab and Repair Program	\$12,700
SIL	Minor Home Repair and Accessibility	\$2,800

**Table 1 –**

FY 2018 HOME Funding Allocations are follows:

<b>Entity</b>	<b>Activity</b>	<b>Amount</b>
City of Columbia	Homeownership Assistance	\$170,000
Columbia Housing Authority	Bryant Walkway II	\$100,000
Show-Me Central Habitat for Humanity	Boone Prairie	\$50,000
Job Point	3 <sup>rd</sup> Avenue-2017 CHDO	\$65,314
CHDO set-aside	Community Housing Dev. Org	\$266,187
City of Columbia	Administration	\$65,132
	<b>Total</b>	<b>\$716,633</b>

### **3. Evaluation of past performance**

The City's is maintaining many of the programs it has historically operated and also adjusts its funding priorities to match annual priority needs identified by the public. Estimated costs are also associated with each production goal to ensure that goals are realistic and achievable. This plan focuses on the most critical community needs identified by the public.

### **4. Summary of Citizen Participation Process and consultation process**

The City of Columbia held 6 public hearings and conducted a citizen survey while developing the FY 2018 Annual Action Plan. The Community Development Commission held a public hearing on January 11, 2017 where the City announced the release of its citizen survey and provided a forum for organizations and the public to provide input on community development needs for the FY 2018 Annual Action Plan. The Community Development Commission then held two additional hearings on May 17, 2017 and June 7, 2017 where local organizations applying for FY 2018 CDBG and/or HOME funds were provided the opportunity to present their proposal(s) and how they addressed community development needs identified in 2015-2019 Consolidated Plan. The City Council then held a budget hearing on August 15th

where the Community Development Commission presented its funding recommendations to the City Council, and members of the public were allowed to comment. The CDC held two additional regular meetings on May 16, 2018 and June 6, 2018 to discuss and decide recommendations for the additional CDBG and HOME funds received for FY 2018. City Council is holding an additional hearing on June 18, 2018 to consider the FY 2018 Annual Action Plan and allow organizations and members of the public to comment on funding priorities within the FY 2018 Annual Action Plan.

**5. Summary of public comments**

There were public comments received from three persons at the Community Development Needs Public Hearing held on January 11, 2017. Public comments were received from Scout Merry of Services for Independent Living, Steve Smith of Job Point, Megan Corbin of Central Missouri Community Action, Steve Smith of Job Point, Dan Hanneken of In2Action, Phil Steinhaus of the Columbia Housing Authority and Michael MacMann of the Planning and Zoning Commission. Each of the speakers shared information regarding the efforts of their corresponding organizations and discussed potential applications for funding. The Community Development Commission asked clarifying questions with each presenter.

**6. Summary of comments or views not accepted and the reasons for not accepting them**

None.

**7. Summary**

The FY 2018 Annual Action Plan addresses priority needs identified in the 2015-2019 Consolidated Plan and does not amend any of the goals or objectives originally identified during formation of the Consolidated Plan.

**PR-05 Lead & Responsible Agencies – 91.200(b)**

**1. Agency/entity responsible for preparing/administering the Consolidated Plan**

Describe the agency/entity responsible for preparing the Consolidated Plan and those responsible for administration of each grant program and funding source.

<b>Agency Role</b>	<b>Name</b>	<b>Department/Agency</b>
Lead Agency	COLUMBIA	Community Development Department
CDBG Administrator	COLUMBIA	Community Development Department
HOME Administrator	COLUMBIA	Community Development Department

**Table 2 – Responsible Agencies**

**Narrative (optional)**

The City of Columbia will continue to be responsible for preparing the Consolidated Plan and Administration of the City's CDBG and HOME funding.

**Consolidated Plan Public Contact Information**

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## **AP-10 Consultation – 91.100, 91.200(b), 91.215(I)**

### **1. Introduction**

The City of Columbia consulted with several local services providers, city departments and local organizations while identifying priority needs for the plan. The consultation process primarily consisted of outreach to local organizations and the public through public hearings and a community survey.

#### **Provide a concise summary of the jurisdiction’s activities to enhance coordination between public and assisted housing providers and private and governmental health, mental health and service agencies (91.215(I))**

The City of Columbia Community Development Department (CD Department) is responsible for administering CDBG and HOME funds and formulating the Consolidated Plan. The CD Department included the City of Columbia Division of Human Services in the formulation of the 2015-2019 Consolidated Plan and works with the CD Department to coordinate funding efforts. The Division of Human Services administers local funding to governmental health, mental health and local service agencies. It also serves as the City's main point of contact for addressing homelessness. The CD Department included the Division of Human Services to reduce duplication of services provided and to maximize utilization of each funding source and ensure coordinated efforts to address community needs. The CD Department also included the CEO of the Columbia Public Housing Authority on the technical team for the Consolidated Plan to assist in planning and coordinating efforts to address affordable housing.

#### **Describe coordination with the Continuum of Care and efforts to address the needs of homeless persons (particularly chronically homeless individuals and families, families with children, veterans, and unaccompanied youth) and persons at risk of homelessness.**

The CD Department held a specific focus group on the issue of homelessness with local service providers that serve the homeless during formation of the 2015-2019 Consolidated Plan. Local service providers attending the focus group were also members of the Basic Needs Coalition (BNC). The BNC consists of local service providers that assist the homeless population in Columbia. The BNC conducts point in time counts, coordinates Project Homeless Connect and works to align services that assist homeless populations. The CD Department consults representatives of the BNC to assist in utilizing CDBG and HOME fund to address the needs of persons experiencing homelessness.

#### **Describe consultation with the Continuum(s) of Care that serves the jurisdiction's area in determining how to allocate ESG funds, develop performance standards for and evaluate outcomes of projects and activities assisted by ESG funds, and develop funding, policies and procedures for the operation and administration of HMIS**

The Missouri Housing Development Commission (MHDC) administers all ESG contracts in Columbia. The City retains the first right of refusal; however MHDC currently contracts directly with local organizations for implementing ESG funding. The City of Columbia works closely with all ESG recipient organizations through the BNC for point in time counts and addressing service gaps to homeless populations.

**2. Describe Agencies, groups, organizations and others who participated in the process and describe the jurisdiction’s consultations with housing, social service agencies and other entities**

The following section identifies agencies groups and organizations that participated in the process of forming the 2018 Annual Action Plan and 2015-2019 Consolidated Plan.

**Table 3 – Agencies, groups, organizations who participated**

1	<b>Agency/Group/Organization</b>	HOUSING AUTHORITY OF THE CITY OF COLUMBIA, MISSOURI
	<b>Agency/Group/Organization Type</b>	Housing PHA Services - Housing
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Public Housing Needs Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Market Analysis Anti-poverty Strategy
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	The Columbia Housing Authority was included on the staff technical team that collected and analyzed data, as well as assisted in community outreach during development of the 2015-2019 Consolidated Plan. The outcomes will be accurate data on participants served through the housing authority, and coordinated efforts on future affordable housing projects. CHA staff also assisted in significant outreach activities to low income households served through CHA.
2	<b>Agency/Group/Organization</b>	BOONE COUNTY FAMILY RESOURCES
	<b>Agency/Group/Organization Type</b>	Housing Services - Housing Services-Persons with Disabilities Services-Health Other government - County
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Public Housing Needs

	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Boone County Group Homes through involvement at several community forums during development of the 2015-2019 Consolidated Plan.
3	<b>Agency/Group/Organization</b>	CENTRAL MISSOURI COMMUNITY ACTION
	<b>Agency/Group/Organization Type</b>	Housing Services - Housing Services-Children Services-Elderly Persons Services-homeless Services-Health Services-Education Services-Employment
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Economic Development Anti-poverty Strategy
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	CMCA was consulted through involvement at several community forums during development of the 2015-2019 Consolidated Plan. CMCA is Columbia's local community action agency implementing several federal programs addressing poverty. CMCA also serves Columbia as a Community Housing Development Organization. The anticipated outcomes of the consultation include identifying affordable housing needs and how to most effectively utilize CDBG and HOME CHDO funding. CMCA is also an important partner in identifying ways to address poverty.
4	<b>Agency/Group/Organization</b>	Centro Latino De Salud, Educacion y Cultura
	<b>Agency/Group/Organization Type</b>	Services-Children Services-Health Neighborhood Organization

	<b>What section of the Plan was addressed by Consultation?</b>	Anti-poverty Strategy
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	The organization was consultant by providing outreach to non-English speaking populations during our public input and survey process. Centro Latino has also provided meeting space for neighborhood meetings.
5	<b>Agency/Group/Organization</b>	JOB POINT
	<b>Agency/Group/Organization Type</b>	Housing Services - Housing Services-Employment
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Unaccompanied youth Non-Homeless Special Needs Market Analysis Economic Development
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Job Point was consulted through participation in several community forums while developing the Consolidated Plan. Job Point staff also provided comment at the January 11, 2017 public hearing. The anticipated outcome of Job Point's participation included additional information regarding economic development and working with low income minority populations. Job Point also serves as a local Community Housing Development Organization and provided significant input in how Columbia can utilize low income minority youth in affordable housing projects.

6	<b>Agency/Group/Organization</b>	SERVICES FOR INDEPENDENT LIVING
	<b>Agency/Group/Organization Type</b>	Services - Housing Services-Persons with Disabilities
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Non-Homeless Special Needs Anti-poverty Strategy
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	The agency was consulted through attendance at community forums/focus groups during development of the 2015-2019 Consolidated Plan. SIL staff also provided comment at the January 11, 2017 community development needs hearing. The anticipated outcome of the consultation is greater coordination between service providers serving persons with disabilities and assistance in developing goals targeted towards assisting persons with disabilities.

**Identify any Agency Types not consulted and provide rationale for not consulting**

NA.

**Other local/regional/state/federal planning efforts considered when preparing the Plan**

<b>Name of Plan</b>	<b>Lead Organization</b>	<b>How do the goals of your Strategic Plan overlap with the goals of each plan?</b>
Continuum of Care	Missouri Housing Development Commission	MHDC oversees ESG funding granted to local agencies. The City of Columbia works with each of the ESG grantees through the Basic Needs Coalition to coordinate services for homeless populations.

Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
Comprehensive Plan	Community Development Department	The FY 2018 Annual Action Plan addresses several goals, objectives and action items of the City's Comprehensive Plan including the following:-Encourage universal design and practices for aging in place.-Promote construction of affordable housing.-Promote home ownership and affordable housing options, and encourage integrated residential densification via flexibility and dwelling unit options.

**Table 4 – Other local / regional / federal planning efforts**

**Narrative (optional)**

The City of Columbia reviewed agency consultation and input received during the formation of the 2015-2019 Consolidated Plan and also provided additional opportunities for updates while forming the FY 2018 Annual Action Plan. Opportunities included 6 public hearings:

- January 11, 2017: CDC Community Development Needs Hearing
- May 17, 2017: CDC Public Projects Hearing and Presentation of Proposals
- June 7, 2017: CDC Local Organizations Hearing and Presentation of Proposals
- June 21, 2017: FY 2018 CDBG and HOME Recommendations Hearing
- May 16, 2018: Regular CDC Meeting: CDC Meeting on Additional Funding for FY 2018 Funds
- June 6, 2018: CDC Public Hearing on Allocation of Additional FY 2018 CDBG and HOME Funds

The City also received 319 responses in its FY 2018 Community Development Needs Survey to assist in informing decisions.

## **AP-12 Participation – 91.105, 91.200(c)**

### **1. Summary of citizen participation process/Efforts made to broaden citizen participation Summarize citizen participation process and how it impacted goal-setting**

The citizen participation process served as the basis for identifying priority needs, which directly guided goal-setting in the City's 2015-2019 Consolidated Plan. All goals identified in the 2015-2019 Consolidated Plan were set based upon priority needs identified by the public. The FY 2018 Annual Action Plan addresses goals identified within the 2015-2019 Consolidated Plan. The City of Columbia's citizen participation process and consultation process in drafting the Consolidated Plan included eight 8 community forums/focus groups, seven public hearings and five citizen surveys.

The FY 2018 Annual Action Plan addresses goals identified within the FY 2018 Annual Action Plan. The City updated citizen input by conducting 6 additional public hearings and its annual Community Development Needs Survey. The public input provided while planning the FY 2018 Annual Action Plan ensured goals and objectives identified in the 2015-2019 Consolidated Plan were up to date and guided funding decisions included within the FY 2018 Annual Action Plan.

**Citizen Participation Outreach**

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (if applicable)
1	Public Hearing	Non-targeted/broad community	9 attendees requesting an update to the economic development target group.	CEO of the Columbia Housing Authority regarding update of current projects and Bryant Walkway II, support for removal of dilapidated homes and support for TBRA.		

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
2	Public Hearing	Non-targeted/broad community	15 persons attended the meeting to present to the Community Development Commission.	Presentation of City Department projects including its rehab/repair programs, homeownership assistance program, demolition program, and storm water improvements on Garth, Sexton, Oak and Lynn. Public member John Clark spoke in favor of City planning process for Lynn/Garth Storm water improvements.		
3	Public Hearing	Non-targeted/broad community	Presentations from 8 local organizations on proposed projects with CDBG and/or HOME funding.	Presentation of each proposal and questions from Community Development Commission members.		

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
4	Public Hearing	Non-targeted/broad community	Regular Council meeting. Budget hearing.	Presentation of Community Development Commission CDBG and HOME funding recommendations for FY 2018.		
5	Regular CDC Meeting	Non-targeted/broad community	Regular CDC meeting. Report on additional CDBG and HOME Funds. 17 Attendees.	Comments from community partners regarding the reallocation of additional funds.		
6	Public Hearing	Non-targeted/broad community	Public Hearing on reallocation of FY 2018 Funds. 14 Attendees.	Comments and discussion regarding the need for additional funds on the Bryant Walkway II project.		

**Table 5 – Citizen Participation Outreach**

## Expected Resources

### AP-15 Expected Resources – 91.220(c) (1, 2)

#### Introduction

The City of Columbia's FY 2018 CDBG funding was significantly increased from previous years and estimates. Program income continues to be steady and provides a significant level of funding for additional projects. City staff anticipates a continuation of additional amounts of program income due to the addition of new projects and continued resale of homes maintaining a City lien.

#### Priority Table

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Reminder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
CDBG	public - federal	Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services	921,326	25,000	229,964	1,176,290.	0	Final HUD allocations and estimated Program Income (loan repayment).

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Reminder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
HOME	public - federal	Acquisition Homebuyer assistance Homeowner rehab Multifamily rental new construction Multifamily rental rehab New construction for ownership TBRA	651,319	105,000	65,314	821,633	0	Final HUD allocations and estimated Program Income (loan repayment).

Table 6 - Expected Resources – Priority Table

**Explain how federal funds will leverage those additional resources (private, state and local funds), including a description of how matching requirements will be satisfied**

CDBG and HOME funds will leverage a significant amount of additional resources including federal, state and local funding. The Homeownership Assistance Program experienced approximately \$247,492.28 in expenditures during FY 2017, resulting in approximately \$4 million private mortgages. The city anticipates a similar level of funding leveraged from private mortgages as result of FY 2018 Homeownership Assistance Program expenditures. The City also allocated an additional \$200,000 in general revenue to construct 4 new affordable, near net-zero homes, which also included investment from a local bank for development financing and CDBG and HOME funding. This project was completed in spring of 2018. The City anticipates similar results of funds leveraged on new development of affordable housing through its N. 8<sup>th</sup> Street-Cullimore Cottages development.

The U.S. Department of Housing and Urban Development (HUD) requires that the Participating Jurisdictions (PJs) that receive HOME funds match \$0.25 of every dollar. The matching requirement mobilizes community resources in support of affordable housing. The City of Columbia will receive \$651,319 in HOME funding for FY2018, requiring an annual match requirement of at least \$162,830. HUD allows Cities to rollover excess match from year to year and accumulate excess match. The City of Columbia has over \$1.7 million in excess match from previous years and anticipates meeting all match requirements for FY 2018 and accumulating additional match.

**If appropriate, describe publically owned land or property located within the jurisdiction that may be used to address the needs identified in the plan**

The City of Columbia previously purchased 3 lots located within the central City on N. 8<sup>th</sup> Street. The City will work with the North Central Neighborhood Association, the Community Development Commission and the Columbia Community Land Trust to develop a plan for redevelopment of affordable housing. Once a viable plan is in place, the City will work with local CHDOs and the Columbia Community Land Trust to develop the properties.

**Discussion**

The City will continue to prioritize needs and projects according to most need, as well federal funding continues to decline.

## Annual Goals and Objectives

### AP-20 Annual Goals and Objectives - 91.420, 91.220(c)(3)&(e)

#### Goals Summary Information

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	Repair of existing housing	2015	2019	Affordable Housing	Citywide	Preservation of Existing Housing Energy Efficient and Universally Designed Housing Quality Affordable Housing Units	CDBG: \$194,880	Homeowner Housing Rehabilitated: 27 Housing Units
2	Repair of existing housing	2015	2019	Affordable Housing	Citywide	Preservation of Existing Housing Energy Efficient and Universally Designed Housing Quality Affordable Housing Units	CDBG: 119,350	Homeowner Housing Rehabilitated & Accessibility Improvements: 45 homes
3	Code Enforcement	2015	2019	Affordable Housing	NEIGHBORHOOD RESPONSE TEAM AREA	Preservation of Existing Housing	CDBG: \$30,000	Housing Code Enforcement/Foreclosed Property Care: 65 Household Housing Unit
4	Homebuyer education	2015	2019	Affordable Housing	Citywide	Increased Homeownership	CDBG: \$9,717 HOME: \$0	Public service activities for Low/Moderate Income Housing Benefit: 100 Households Assisted

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
5	Removal of dilapidated structures	2015	2019	Affordable Housing Non-Housing Community Development	NEIGHBORHOOD RESPONSE TEAM AREA	Removal of dilapidated structures	CDBG: \$54,055	Buildings Demolished: 2 Buildings
6	Garth, Sexton, Oak and Lynn Sidewalks	2015	2019	Non-Housing Community Development	CDBG Eligible Area	Affordable Housing, Sidewalks	CDBG: \$80,000	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 2500 Persons Assisted
7	Vocational Training	2015	2019	Non-Housing Community Development	Citywide	Vocational training targeting youth	CDBG: \$0 Local GR: \$250,000	Public service activities other than Low/Moderate Income Public Service Benefit: 15 Persons
8	Community Facility Improvements	2015	2019	Non-Housing Community Development	CDBG Eligible Area	Worley Head Start Renovations	CDBG: \$85,000	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 60 Children Assisted
9	Community Facility Improvements	2015	2019	Non-Housing Community Development	CDBG Eligible Area	Brown Station Road Development-Habitat	CDBG: \$80,000	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 144 Households
10	Community Facility Improvements	2015	2019	Non-Housing Community Development	CDBG Eligible Area	Job Point Facility Purchase	CDBG: \$250,000	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 423 Persons

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
11	Community Facility Improvements	2015	2019	Non-Housing Community Development	CDBG Eligible Area	Family Health Center Renovations	CDBG: \$15,909	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 6,276 Persons Assisted
12	Fair housing education to households	2015	2019	Affordable Housing Public Housing	Citywide	Fair housing outreach and education	CDBG: \$5,000	Public service activities for Low/Moderate Income Housing Benefit: 100 Households Assisted
13	Fair housing education to housing professionals	2015	2019	Affordable Housing Public Housing	Citywide	Fair housing outreach and education to housing pro	CDBG: \$4,000	Other: 70 Other
14	Fair housing counseling	2015	2019	Affordable Housing Public Housing	Citywide	Fair housing counseling	CDBG: \$5,000	Public service activities for Low/Moderate Income Housing Benefit: 10 Households Assisted
15	Homebuyer Assistance	2015	2019	Affordable Housing	Citywide	Increased Homeownership	HOME: \$170,000	Direct Financial Assistance to Homebuyers: 30 Households Assisted
16	New housing construction	2015	2019	Affordable Housing	Central City-3 <sup>rd</sup> Avenue	Increased Homeownership Energy Efficient and Universally Designed Housing Quality Affordable Housing Units	HOME: \$65,314	Homeowner Housing Added: 1 Housing Units

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
17	New housing construction	2015	2019	Affordable Housing	Central City-N 8 <sup>th</sup> Street	Increased Homeownership Energy Efficient and Universally Designed Housing Quality Affordable Housing Units	HOME: \$266,187	Homeowner Housing Added: 4 Housing units.
18	New housing construction	2015	2019	Affordable Housing	CDBG Eligible Area-Brown Station Road	Increased Homeownership Energy Efficient and Universally Designed Housing Quality Affordable Housing Units	HOME: \$50,000	Homeowner Housing Added: 2 Housing units.
19	Rental Production	2015	2019	Affordable Housing	Central City-Bryant Walkway II	Quality Affordable Rental housing units	HOME: \$100,000	Rental Housing Added: 2 units.

Table 7 – Goals Summary

### Goal Descriptions

1	<b>Goal Name</b>	Repair of existing housing
	<b>Goal Description</b>	Funding for City Rehab Minor Home Repair Program and Services for Independent Living Minor Home Repair and Accessibility Program.

2	<b>Goal Name</b>	Repair of existing housing
	<b>Goal Description</b>	Funding for City Rehab Minor Home Repair Program and Services for Independent Living Minor Home Repair and Accessibility Program.
3	<b>Goal Name</b>	Code Enforcement
	<b>Goal Description</b>	Code Enforcement within NRT Area.
4	<b>Goal Name</b>	Homebuyer education
	<b>Goal Description</b>	Homebuyer Education for first-time homebuyers participating in the City's Homeownership Assistance Program. No funding will be allocated to this, due to donations from Providence Bank for course materials and presentations.
5	<b>Goal Name</b>	Removal of dilapidated structures
	<b>Goal Description</b>	Demolition of vacant and dilapidated structures.
6	<b>Goal Name</b>	Owner Occupied Rehabilitation
	<b>Goal Description</b>	Comprehensive rehabilitation of owner-occupied homes.
7	<b>Goal Name</b>	Garth, Sexton Oak and Lynn
	<b>Goal Description</b>	Sidewalks.
8	<b>Goal Name</b>	Brown Station Road Development
	<b>Goal Description</b>	Predevelopment and Infrastructure.
9	<b>Goal Name</b>	Community Facility Improvements
	<b>Goal Description</b>	Renovations to Head Start Worley Site

<b>10</b>	<b>Goal Name</b>	Job Point
	<b>Goal Description</b>	Facility purchase.
<b>11</b>	<b>Goal Name</b>	Family Health Center
	<b>Goal Description</b>	Facility Renovations.
<b>12</b>	<b>Goal Name</b>	Fair housing education to households
	<b>Goal Description</b>	Outreach and education to households through local events.
<b>13</b>	<b>Goal Name</b>	Fair housing education to housing professionals
	<b>Goal Description</b>	Fair housing education to property managers, lenders, Realtors and housing professionals.
<b>14</b>	<b>Goal Name</b>	Fair housing counseling
	<b>Goal Description</b>	Fair housing counseling to low income renters and homebuyers.
<b>15</b>	<b>Goal Name</b>	Homebuyer Assistance
	<b>Goal Description</b>	Direct homebuyer down payment assistance.
<b>16</b>	<b>Goal Name</b>	New housing construction
	<b>Goal Description</b>	Construction of 4 homes through HOME CHDO funding on N 8 <sup>th</sup> Street.
<b>17</b>	<b>Goal Name</b>	New housing construction

	<b>Goal Description</b>	Construction of 1 home through HOME CHDO funding on 3 <sup>rd</sup> Avenue.
<b>18</b>	<b>Goal Name</b>	New housing construction
	<b>Goal Description</b>	Construction of 2 homes through HOME CHDO funding at Boone Prairie.
<b>19</b>	<b>Goal Name</b>	Rental Production
	<b>Goal Description</b>	Renovation and RAD Conversion of public housing authority units for rental housing.

**Table 8 – Goal Descriptions**

**Estimate the number of extremely low-income, low-income, and moderate-income families to whom the jurisdiction will provide affordable housing as defined by HOME 91.215(b):**

The City anticipates impacting the following number of families with affordable housing as defined by HOME 91.215(b):

Extremely low-income: 47 households (SIL-45, CHA-2)

Low-income: 37 households (HOA-15, Rehab-20, New Housing-2)

Moderate income: 27 households (HOA-15, Rehab-7, New Housing-5)

Total: 111 Households.

## **AP-35 Projects – 91.220(d)**

### **Introduction**

All projects identified in the FY 2018 Annual Action Plan were identified through the City's annual CDBG and HOME Request for Proposals (RFP) process, or HOME CHDO funding RFP process.

### **Describe the reasons for allocation priorities and any obstacles to addressing underserved needs**

All allocation priorities are identified as objectives in the 2015-2019 Consolidated Plan.



## **AP-50 Geographic Distribution – 91.220(f)**

### **Description of the geographic areas of the entitlement (including areas of low-income and minority concentration) where assistance will be directed**

A significant level of resources will be directed within the CDBG Eligible Area and the Neighborhood Response Team (NRT) Area. Both of these areas maintain disproportionately higher concentrations of low to moderate income populations and minority populations. The City will direct services to these areas to assist with code enforcement, removal of dilapidated structures and improvements to Garth, Sexton, Oak and Lynn block. The City will continue to make housing programs available citywide in an effort to invest in lower-income neighborhoods, as well as to provide low to moderate income housing options in higher opportunity neighborhoods.

### **Geographic Distribution**

<b>Target Area</b>	<b>Percentage of Funds</b>
CDBG Eligible Area	45
NEIGHBORHOOD RESPONSE TEAM AREA	20
Remainder of City	35

**Table 9 - Geographic Distribution**

### **Rationale for the priorities for allocating investments geographically**

Funding priorities were determined by examining annual proposals submitted, identifying if they meet an annual goal identified in the consolidated plan, examining public input and survey data, and examining the viability of each proposals. The NRT Code Enforcement and NRT Demolition activities will take place within the Neighborhood Response Team (NRT) Area, due to the additional identified need of code enforcement and removal of dilapidated structures. All City housing efforts and fair housing efforts are being done citywide, in order to ensure housing assistance and options are eligible in all neighborhoods.

## Affordable Housing

### AP-55 Affordable Housing – 91.220(g)

#### Introduction

The City will support a variety of affordable projects including rehabilitation (owner and rental), acquisition, and the production of new units. The City will be serving homeless households through funds provided to Turning Point. Special needs populations will be served through projects funded at Services for Independent Living.

<b>One Year Goals for the Number of Households to be Supported</b>	
Homeless	0
Non-Homeless	66
Special-Needs	45
Total	111

**Table 10 - One Year Goals for Affordable Housing by Support Requirement**

<b>One Year Goals for the Number of Households Supported Through</b>	
Rental Assistance	0
The Production of New Units	2
Rehab of Existing Units	72
Acquisition of Existing Units	37
Total	111

**Table 11 - One Year Goals for Affordable Housing by Support Type**

## AP-60 Public Housing – 91.220(h)

### Introduction

The Columbia Housing Authority (CHA) was established in 1956 as a municipal corporation under the 1937 federal housing act and Chapter 99 of the Revised Statutes of the state of Missouri. A federal urban renewal grant provided money to replace dangerous and unsanitary residences in Columbia’s central city with safe and clean dwellings at affordable rents for low-income persons. Columbia’s four public housing developments were constructed between 1958 and 1973.

### Actions planned during the next year to address the needs to public housing

In late 2018 and early 2019, the Columbia Housing Authority will complete substantial renovation of 90 units of public housing under the HUD Rental Assistance Demonstration (RAD) program. Renovations of the following public housing developments have and will be completed utilizing state and federal Low-Income Housing Tax Credits allocated by the Missouri Housing Development Commission (MHDC) for the following five projects:

Housing Development	Number of Public Housing Units	Start Date	Completion Date
Stuart Parker Apartments with Paquin Tower	284	January 2016	September 2017
Bear Creek Apartments	76	May 2016	October 2017
Oak Towers	147	January 2017	July 2018
Bryant Walkway Apartments	54	December 2017	March 2019
Bryant Walkway II Apartments	36	December 2017	December 2018

The CHA has 120 units of public housing left to renovate in future years. The CHA submitted an application for federal low-income housing tax credits in March 2018 to renovate 50 additional public housing units known as the Providence Walkway Apartments. If funded, construction is estimated to begin in the spring of 2019.

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

The Resident Advisory Board (RAB) that is composed of assisted housing residents from all CHA affordable housing properties as well as participants in the CHA's Section 8 Housing Choice Voucher Program.

All meetings of the CHA Board of Commissioners are open to the public and all assisted housing residents are encouraged to attend the meetings. Meeting notices are posted at all CHA affordable housing sites as well as to the CHA's web site. Anyone can request to receive an email notification when CHA agenda packets are posted to the CHA web site. Full agenda packets are also available for review at the CHA's Administration Building at 201 Switzler Street and at the J.W. "Blind" Boone Community Center at 301 North Providence Road.

The CHA sponsors the free Money Smart program that is available to all CHA assisted housing residents. Money Smart is a ten week program that covers all aspects of home ownership and home budgeting. Graduation from the Money Smart program qualifies participants for the City of Columbia's first time homeownership down payment assistance program.

The CHA also offers a Family Self-Sufficiency Program to all assisted housing residents that allows them to set goals for homeownership and escrow funds during the process that can be used for down payment assistance. The CHA also offers the Section 8 Homeownership Program.

### **If the PHA is designated as troubled, describe the manner in which financial assistance will be provided or other assistance**

The Columbia Housing Authority is not a troubled agency. The CHA is designated as a high performing housing authority.

## **AP-65 Homeless and Other Special Needs Activities – 91.220(i)**

### **Introduction**

The City of Columbia FY2018 Annual Action Plan does not provide direct funding for homeless persons, however, funding renovations expended for the Family Health Center will improve a facility that often serves homeless persons. Previous City plans in recent past have provided resources for improvements serving homeless persons through renovations at Welcome Home, Reality House and Turning Point.

The FY 2018 Annual Action Plan does provide significant funding to serve special needs populations including accessibility improvements and home repairs through Services for Independent Living.

### **Describe the jurisdictions one-year goals and actions for reducing and ending homelessness including Reaching out to homeless persons (especially unsheltered persons) and assessing their individual needs**

The Basic Needs Coalition conducts point in time counts and coordinates project homeless connect. The point in time counts allows participant agencies to assess the level of homelessness needs in the community, as well as provide referral services and resources to homeless persons. Project homeless connect provides a multitude of services and referrals for homeless populations in Columbia.

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

The City of Columbia provided a significant amount of funds in FY 2015 for Welcome Home's emergency shelter. The City anticipates that Welcome Home to completed construction in July of 2017 and City staff conducted a close-out monitoring of files in spring of 2018.

### **Helping low-income individuals and families avoid becoming homeless, especially extremely low-income individuals and families and those who are: being discharged from publicly funded institutions and systems of care (such as health care facilities, mental health facilities, foster care and other youth facilities, and corrections programs and institutions); or, receiving assistance from public or private agencies that address housing, health, social services, employment, education, or youth needs.**

The City's strategic plan goals contribute to helping homeless persons make the transition to permanent housing and independent living by providing funds for facilities operated by agencies that serve these populations and by expanding affordable housing options to these populations. The City's Division of Human Services also administers close to \$900,000 in local general revenue to assist social service providers serving these populations.

## **AP-75 Barriers to affordable housing – 91.220(j)**

### **Introduction**

The City of Columbia raised awareness of barriers to affordable housing through the Affordable Housing Symposium event that was held on December 3-4th, 2015. The event featured speakers from Missoula, MT and Boulder, CO, as well as local experts. The event was attended by 132 persons representing Realtors, Lenders, Developers, Builders, City staff, Elected Officials, the University of Missouri-Columbia, Columbia Chamber of Commerce, social service providers, neighborhood organizations, the general public, and other community leaders. The main goal of the event was to educate the public and leaders on affordable housing needs and identify key actions the City should take to address affordable housing. The top five affordable housing actions identified by attendees were:

1. Create a housing trust fund.
2. Intentional affordable housing City Council Policy (incentives for builders/developers.)
3. Creating incentives and removing disincentives.
4. Create a Director of Affordable Housing at the City of Columbia.
5. Formal City Council acknowledgement that affordable housing is a community priority and a basic human right.

The City plans to begin conducting its Analysis of Impediments to Fair Housing Choice in 2018 with its newly formed Fair Housing Task Force. The Task Force will identify funding goals and potential policies that further fair housing within Columbia, MO. The Task Force will also work with City staff to conduct outreach to the public for input into the process.

### **Actions it planned 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**

The City plans to begin conducting its Analysis of Impediments to Fair Housing Choice in 2018 with its newly formed Fair Housing Task Force. The Task Force will identify funding goals and potential policies that further fair housing within Columbia, MO. The Task Force will also work with City staff to conduct outreach to the public for input into the process.

## **AP-85 Other Actions – 91.220(k)**

### **Introduction**

This section identifies additional required actions the City must take as a part of its annual action plan.

### **Actions planned to address obstacles to meeting underserved needs**

The FY 2018 Annual Action Plan allocates funding to make significant improvements to the Family Health Center and Worley Street Head Start to, which will greatly improve services provided low-income populations.

### **Actions planned to foster and maintain affordable housing**

The City has also allocated additional in general revenue funds for the development of new housing on N. 8<sup>th</sup> Street, and plans to work with local CHDOs and the Columbia Community Land Trust to develop long-term affordable housing. The Columbia Community Land Trust, Inc. was incorporated on November 3, 2016. A board was appointed and by-laws adopted in 2017. The CCLT has also adopted financial procedures, began creating a strategic plan, opened a bank account, procured an accounting firm and submitted its 501c3 application to the IRS. Significant progress is expected to be achieved in FY2018.

### **Actions planned to reduce lead-based paint hazards**

The City will continue to reduce the number of units containing lead-based paint hazards, primarily through its housing rehabilitation programs; and through the demolition of dilapidated un-safe structures that contain lead paint. The City requires all houses to be lead-safe on completion of rehabilitation activities. The City will continue to utilize a licensed risk assessor to provide lead hazard evaluation for projects requiring an assessment. The city plans to hold an EPA Certified Renovation and Remodeling class again this year and requires all contractors permanently abating lead services to hold a State lead abatement license. The City is consistently bringing houses in lead safe condition through its Owner Occupied Housing Rehabilitation Program and educating contractors and applicants concerning lead hazards.

### **Actions planned to reduce the number of poverty-level families**

The primary activity that will reduce the number of poverty level families is the funding of Job Point's Vocational Training program. The goal of the training is to obtain employment or increased employment in areas of high demand, resulting in higher household incomes.

### **Actions planned to develop institutional structure**

The City increased its CDBG Administration funding from 16% to 18% in FY2015 in order help fund an additional housing specialist position. The additional position was filled in December 2015 and has helped increase production in the homeownership program and minor home repair programs, while allowing additional staff time for closer monitoring of CDBG sub-recipients and CHDOs. The CDBG and Housing Programs staff has also been relocated to a store front location on 500 E. Walnut. This location allows for greater visibility and accessibility of the City's HUD funded programs. The cost of moving to this location and rent has been covered by City general revenue.

### **Actions planned to enhance coordination between public and private housing and social service agencies**

The Fair Housing Task Force includes members of public, private housing and social service organizations that will be conducting the City's Analysis of Impediments to Fair Housing Choice. This process will bring a variety of stakeholders together to discuss the critical issues that relate to furthering fair housing in Columbia.

## Program Specific Requirements

### AP-90 Program Specific Requirements – 91.220(I)(1,2,4)

#### Introduction

Projects planned with CDBG and HOME funds for FY2018 are identified in the Projects Table. The following identifies program income available to utilize in planned projects. The City of Columbia expends program income before HUD funds on each quarterly draw request. Columbia will be completed a CDBG and HOME draw at the end of FY2017, so there was no carry over program income on hand prior to the start of FY2018.

#### Community Development Block Grant Program (CDBG)

##### Reference 24 CFR 91.220(I)(1)

Projects planned with all CDBG funds expected to be available during the year are identified in the Projects Table. The following identifies program income that is available for use that is included in projects to be carried out.

1. The total amount of program income that will have been received before the start of the next program year and that has not yet been reprogrammed	0
2. The amount of proceeds from section 108 loan guarantees that will be used during the year to address the priority needs and specific objectives identified in the grantee's strategic plan.	0
3. The amount of surplus funds from urban renewal settlements	0
4. The amount of any grant funds returned to the line of credit for which the planned use has not been included in a prior statement or plan	0
5. The amount of income from float-funded activities	0
<b>Total Program Income:</b>	<b>0</b>

#### Other CDBG Requirements

1. The amount of urgent need activities	0
2. The estimated percentage of CDBG funds that will be used for activities that benefit persons of low and moderate income. Overall Benefit - A consecutive period of one, two or three years may be used to determine that a minimum overall benefit of 70% of CDBG funds is used to benefit persons of low and moderate income. Specify the years covered that include this Annual Action Plan.	90.00%

**HOME Investment Partnership Program (HOME)  
Reference 24 CFR 91.220(l)(2)**

- 1. A description of other forms of investment being used beyond those identified in Section 92.205 is as follows:**

The City does not plan any additional investment beyond eligible uses of HOME funds identified in 92.205.

**2. A description of the guidelines that will be used for resale or recapture of HOME funds when used for homebuyer activities as required in 92.254, is as follows:**

The City of Columbia will use recapture provisions as required by 24 CFR 92.254 for homebuyer activities. The recapture provisions are as seen below:

The buyer, as a condition of accepting homeownership assistance funds, agrees to comply with the following provisions:

- A. That homeownership assistance funds will only be used for down payment and closing costs toward purchase of a home within the city limits of Columbia, or for lead hazard reduction procedures as required.
- B. That the property to be purchased shall be an existing single family home or a condominium, the value of which does not exceed 95% of the median purchase price for the area, as described in paragraph (a)(2)(iii) of 24 CFR 92.254. Property shall not be located in the 100-year floodplain.
- C. That ownership shall be in a fee simple title or equivalent form of ownership approved by HUD.
- D. That the buyer qualifies as a “low income family” and meets the current HUD income limits.
- E. That the property to be purchased shall continue to be owned by borrower and shall continuously be the principal residence of buyer for the following ten (10) years from closing subject to the following:
  - a. In the event owner sells or transfers the property or it is transferred by death of owner during the ten (10) year period of affordability, the amount of forgiveness of the loan shall be prorated and owner shall repay that portion to City that remains of the ten (10) year period.
  - b. In the event owner abandons or leases the property or ceases to occupy it as his or her principal residence during the ten (10) year period of affordability, there shall be no prorated credit and the entire amount of the loan shall be due and payable in full.
- F. Closing must occur on or before \_\_\_\_\_, 2018 (60 calendar days from date of this agreement). After that date, this loan commitment is no longer in force and the funds shall be released from this Agreement. Applicant would need to reapply and requalify if he/she chooses to proceed beyond this termination date.
- G. That the buyer will sign a Promissory Note and Deed of Trust for the full amount of CDBG and HOME assistance provided toward the purchase of said property, and the Deed of Trust will be recorded with the Boone County Recorder’s Office, Columbia, Missouri.

**3. A description of the guidelines for resale or recapture that ensures the affordability of units acquired with HOME funds? See 24 CFR 92.254(a)(4) are as follows:**

The City of Columbia will use recapture provisions as required by 24 CFR 92.254 for homebuyer activities. The recapture provisions are as seen below:

The buyer, as a condition of accepting homeownership assistance funds, agrees to comply with the following provisions:

A. That homeownership assistance funds will only be used for down payment and closing costs toward purchase of a home within the city limits of Columbia, or for lead hazard reduction procedures as required.

B. That the property to be purchased shall be an existing single family home or a condominium, the value of which does not exceed 95% of the median purchase price for the area, as described in paragraph (a)(2)(iii) of 24 CFR 92.254. Property shall not be located in the 100-year floodplain.

C. That ownership shall be in a fee simple title or equivalent form of ownership approved by HUD.

D. That the buyer qualifies as a "low income family" and meets the current HUD income limits.

E. That the property to be purchased shall continue to be owned by borrower and shall continuously be the principal residence of buyer for the following ten (10) years from closing subject to the following:

a. In the event owner sells or transfers the property or it is transferred by death of owner during the ten (10) year period of affordability, the amount of forgiveness of the loan shall be prorated and owner shall repay that portion to City that remains of the ten (10) year period.

b. In the event owner abandons or leases the property or ceases to occupy it as his or her principal residence during the ten (10) year period of affordability, there shall be no prorated credit and the entire amount of the loan shall be due and payable in full.

F. Closing must occur on or before \_\_\_\_\_, 2015 (60 calendar days from date of this agreement). After that date, this loan commitment is no longer in force and the funds shall be released from this Agreement. Applicant would need to reapply and requalify if he/she chooses to proceed beyond this termination date.

G. That the buyer will sign a Promissory Note and Deed of Trust for the full amount of CDBG and

HOME assistance provided toward the purchase of said property, and

**4. Plans for using HOME funds to refinance existing debt secured by multifamily housing that is rehabilitated with HOME funds along with a description of the refinancing guidelines required that will be used under 24 CFR 92.206(b), are as follows:**

There are no plans to utilize HOME funds to refinance existing debt secured by multi-family housing rehabilitated with HOME funds. The City will subordinate HOME and CDBG loans as requested by property owners refinancing debt. The City includes subordination requirements in its CDBG and HOME Administrative Guidelines.