

APPENDICES

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APPENDIX A

LIST OF ABBREVIATIONS USED

ABCRC	Asheville-Buncombe Community Relations Council
AB Tech	Asheville-Buncombe Technical Community College
ABCCM	Asheville-Buncombe Community Christian Ministries
ADA	Americans With Disabilities Act
ADDI	American Dream Downpayment Initiative
AHOPE	Day Center operated for the homeless by Homeward Bound
AMI	Area median income
BCHC	Buncombe County Health Center
CAPER	Consolidated Annual Performance and Evaluation Report
CDBG	Community Development Block Grant (program)
CIP	Capital improvements plan
CoC (The Continuum)	Continuum of Care (Plan)
CT	Census Tract
DENR	North Carolina Department of Environment and Natural Resources
DSS	Department of Social Services
EBL	Elevated blood lead level
EFRC	Emma Family Resource Center
ELI	Extremely low-income (30% of area median income and below)
FHAP	Fair Housing Assistance Program (HUD Grant program)
FMR	Fair Market Rent
FTE	Full-time equivalent
GED	General Equivalency Diploma
HAC	Housing Assistance Corporation
HACA	Housing Authority of the City of Asheville
HH	Households
HMDA	Home Mortgage Disclosure Act
HMIS	Homeless Management Information System
HOME	HOME Investment Partnerships Act (program)
HUD	U.S. Department of Housing and Urban Development
IDA	Individual Development Account
LBP	Lead-based paint
LI	Low-income (below 80% of AMI)
LIHTC	Low Income Housing Tax Credit
LPPP	The Lead Poisoning Prevention Program of UNCA
LSWP	Lead-Safe Work Practices
M/F	Multifamily (housing)
MHO	Mountain Housing Opportunities
MMF	Mountain Microenterprise Fund

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MSA	Metropolitan Statistical Area
NCHFA	North Carolina Housing Finance Agency
NHS	Neighborhood Housing Services
NIMBY	“not in my back yard”
PATH	Projects for Assistance in Transition from Homelessness
RBI	Regional Brownfields Initiative
S/F	Single family (housing)
SBA	(U.S.) Small Business Administration
SCORE	Service Corps of Retired Executives
SOP	Strategic Operating Plan (of the City of Asheville)
SRO	Single room occupancy
SSDI	Social Security Disability Income
SSI	Social Security Income
TANF	Temporary Assistance to Needy Families
The City	The City of Asheville
The Consortium	The Asheville Regional Housing Consortium (covering Buncombe, Henderson, Madison and Transylvania Counties)
The Plan (or this Plan)	The Consolidated Strategic Housing & Community Development Plan for 2010 - 2015
UDO	(City of Asheville) Unified Development Ordinance
USDA	U.S. Department of Agriculture
VA	U.S. Veterans Administration
VLI	Very low-income (50% of area median income and below)
WCCA	Western Carolina Community Action
WIC	Women Infants and Children (federal nutrition program)
XRF	X-Ray Fluorescence (lead testing device)

APPENDIX B

REGULATORY CITATIONS

HUD's regulations for the CDBG and HOME programs and the consolidated planning requirements are set out in Title 24 of the Code of Federal Regulations (CFR).

- ? CDBG regulations are in 24 CFR Part 570.
- ? HOME regulations are in 24 CFR Part 92
- ? The regulations governing the Consolidated Planning process are in 24 CFR Part 91.

These regulations are available to the public at the Asheville-Buncombe Main Library at 67 Haywood Street, at the City's Community Development Division office on the fifth floor of City Hall, and on the internet at www.hudclips.org.

APPENDIX C

FORMAL CONSULTATION AND COMMENTS RECEIVED

Public Participation Process

The main vehicle for consultation on the Plan was through the focus groups and public meetings which were convened to establish priorities and strategies for affordable housing activities in each of the four Consortium counties and for non-housing community development activities in the City of Asheville. Meetings were held in November and December of 2009. Focus groups were conducted in each county, with representatives of non-profit housing agencies, for-profit housing developers and managers, and local and county governments. Open public meetings were conducted in each county. Additional focus groups were conducted in Asheville, with representatives of social service and special needs housing providers, and economic development interests. 113 people took part in these public participation opportunities, including representatives of the following organizations.

Public Entities	Non-profit Agencies and Businesses, Other Organizations
Buncombe County/City of Asheville	
Buncombe County Town of Black Mountain UNCA Lead Poisoning Prevention Program Housing Authority of the City of Asheville City of Asheville	Community Action Opportunities OnTrack Eagle/Market Streets Development Corporation Helpmate, Inc. Council on Aging Self-Help Credit Union WNC Green Building Council Asheville Area Habitat for Humanity Mountain Housing Opportunities United Way of Asheville and Buncombe County Pisgah Legal Services Community Foundation of Western North Carolina Green Opportunities, Inc. Eblen Charities Asheville-Buncombe Community Christian Ministries Asheville Buncombe Community Relations Council Greenplan Jane Matthews Architects Asheville-Buncombe Board of Realtors WNC Group Homes Homeward Bound North Carolina Dwellings ABR Affordable Housing Committee Western Acquisition Conference Wolf Mountain Realty

<i>Henderson County</i>	
Western Carolina Community Action (Section 8 Administrator) City of Hendersonville Henderson County Town of Mills River Town of Fletcher	Housing Assistance Corporation On Track Western Carolina Community Action Pisgah Legal Services Children and Family Resource Center NSHC United Way BRCHS RCHS Habitat for Humanity Council On Aging of Henderson County CFRC Henderson County Board of Realtors Henderson County Home Builders Assoc. Tri-County Builders Greg Cloos, Landscape Architecture First Citizens Bank Rod Hubbard, Inc. Interfaith Assistance Ministry Providence Custom Homes Luther Smith Land Planning
<i>Madison County</i>	
Madison County Town of Marshall Town of Hot Springs Town of Mars Hill Madison County Schools	Community Action Opportunities Madison County Habitat for Humanity Pisgah Legal Services Confederation Log Cabins CHC of Madison County French Broad Baptist Church My Sister's Place
<i>Transylvania County</i>	
City of Brevard Town of Rossman Transylvania County Western Carolina Community Action	Transylvania County Habitat for Humanity Western Carolina Community Action United Way of Transylvania County Transylvania County Community Land Trust Sharing House Wesley Community Development Corp McPherson Construction Asheville Savings Bank Eco Concepts Transylvania County Rentals

<i>City of Asheville – Non-Housing Community Development</i>	
Buncombe County Dept. of Social Services Asheville Transit System Land of Sky Regional Council of Governments Housing Authority of the City of Asheville	Eagle Market Streets Development Corporation On Track Community Foundation of WNC Asheville Area Chamber of Commerce United Way of Asheville/Buncombe County Economic Development Coalition Handmade in America Self-Help Credit Union Green Opportunities Mountain Housing Opportunities Housing Authority of the City of Asheville YWCA of Asheville Western Highlands Network Equality United

The public hearings and focus groups on the Annual Action Plan/Five-Year Consolidated Plan process were held on October 22, 2009 in Hendersonville; October 29, 2009 in Brevard; November 12 in Marshall; November 5, 2009 for Buncombe County in Asheville; and December 10, 2009 in Asheville. Notice for the hearings was published in the Asheville Citizen-Times (10/22/09 and 11/22/09), Hendersonville News-Record & Sentinel (10/6/09), Madison County Times-News (10/28/09) and Transylvania Times (10/12/09).

The Consolidated Plan was discussed on the agenda of the Asheville Regional Housing Consortium on December 7, 2009, March 5 and March 26, 2010 and April 16, 2010; and on the agenda of the City’s Housing & Community Development Committee met November 30, 2009, and on January 28, February 18, March 18 and April 15, 2010. These meetings were open to the public.

We published a notice of public hearing for the proposed Consolidated Plan in the Asheville-Citizen Times March 28, 2010, and subsequently in the News-Record & Sentinel, Times-News and Transylvania Times. Public meetings were held in Brevard (April 14, 2010), Marshall (April 15, 2010) and Hendersonville (April 22, 2010). The public hearing took place on April 27 at the regularly scheduled meeting of Asheville City Council, and the Plan was approved by Council on April 27, 2010.

We maintain citizen participation throughout the year with active involvement in projects as they are planned and implemented.

Comments made at the two public hearings and those submitted in writing are summarized below:

Hendersonville Public Meeting - October 22, 2009

Attending: Ken Perkins, Parker Sloan, Bill Burdett; CD Staff: Jeff Staudinger, Roberta Greenspan.

Attendees discussed the need for a home repair program in the county. They hoped that a local non-profit could organize, and take advantage of church groups for volunteer labor. They also expressed interest in replicating the Asheville's Burton Street weatherization project.

Rental housing development should be a priority. Would like to see program where over time, people could come to own the apartment/unit in the building. There was support for density bonuses.

Brevard Public Meeting – October 29, 2009

Attending: Del Bly, Josh Freeman; CD Staff: Jeff Staudinger, Roberta Greenspan.

Attendees discussed the issue of availability of land, and the need for increased job opportunities.

Marshall Public Meeting – November 12, 2009

Attending: Steve Garrison, Lori Massey, Rick Molland, Dr. Ronald Wilcox. Staff: Jeff Staudinger

- ? Affordable housing for Madison County's existing residents is a primary need.
- ? An option that many do choose is to site a mobile home on family land. This housing is often substandard, and even when new, is likely to depreciate over time. Would it be possible to develop a program where the value of that land could leverage financing for the construction of a permanent home?
- ? The only way to make infrastructure and land affordable is to develop subdivisions. However, with no municipal infrastructure, and hard to develop land due to soils and topography, large tracts are necessary.
- ? Habitat for Humanity is having a hard time finding families who qualify for even their zero percent financing, due to lack of jobs.
- ? There is a market for rental housing, but there is an open question about how large that market is. The need is for mixed income rental development.
- ? Housing for persons with disabilities is a great need. Ramps offer immediate safety and meet needs for egress and accessibility.
- ? The single-family housing rehabilitation program run by the Community Housing Coalition helps people stay in their homes, and is greatly appreciated.

Asheville/Buncombe Public Hearing 1, November 5, 2009

Attending: Laurie Knowles Ron Katz, Laura Willis, Scott Young, Tiffany Frye, John Carl Brew, Cynthia Fox-Barcklow, Ellen Szedon, Jon Creighton, Kaleel Brown, Hysion Davis, DeWayne Barton. CD Staff: Jeff Staudinger, Roberta Greenspan.

- ? TBRA funds: Hard to find landlords OK with restrictions and low enough rent. Would love restrictions lifted to make it easier to help clients
- ? Alternative definitions of family for housing, and different types of housing to accommodate those definitions – roomettes, suites, other configurations
- ? Projects must meet national energy code. Best practices are far superior. CDBG and HOME – Energy star minimal

- ? Matching of funds: A diverse project with multiple funding sources is more competitive for HOME grant funds and the money will go further that way
- ? City depends on non-profits to be in touch with those in need and proposals reflect that. We want to hear from people directly too
- ? Fix places before people move in and before problems get worse or it costs more later (housing rehab for landlords funds)
- ? Make rehab money available to landlords of small # of unit rentals and to participants, for repairs. Do landlords know what is available to them? Are there funds for repair and weatherization? This needs to be expanded.
- ? How to protect the elderly, poor, from new higher taxes, or neighborhoods become affordable only to the wealthier and well paid working.
- ? All the green building initiative have actually pushed poor folks out as new expensive buildings are being built
- ? There should be requirements for developers to meet with people who live in the area of proposed development, before they can receive any funding – could that be a condition for funding?
- ? Emergency needs – a homeless shelter for those with disabilities is desperately needed – nothing available – includes people with Alzheimer's etc that may wander out at night
- ? The new threshold may be that it be within walking distance to public transport – how to benefit the most people of low income

Asheville/Buncombe Public Hearing 2, December 10, 2009

Attending: David Way, Stephanie Twitter, Alan Ditmore, Laura Dominkovic, DeWayne Barton, Eddie Stockhausen, R. Abbot, Deborah Hellman, Mark Duffy, John West, Alana Pierce, Jonathon Stansell, Gordon Smith, Sheila Obrien, Mike Butran, Katie Damien, David Wall, Randall Barnett, Cindy Weeks, Staff: Jeff Staudinger, Roberta Greenspan, John Sanchez, Randy Stallings, Angie Cullen

- ? It is hard to make a rental apartment profitable these days. 1% of purchase price is needed for rent, so \$70,000 house should rent for \$700 minimum.
- ? High density areas have a lot of use and must be maintained, management is important for these areas. Tenant selection plays an important part to keep problems to a minimum. The management of a for-profit is more difficult if everyone that needs affordable housing gets in, no matter what their background. Everyone agreed tenant selection plays a big part in successful environment.
- ? Mixed income development – there is not necessarily any minimums or maximums for affordable housing. The City has been seeking to fund projects that create the most units that are kept affordable for the longest time frame.
- ? Some success stories – first time homebuyer said the process really worked for her, and a realtor said she helped ½ dozen clients this year and helped someone looking for two years to finally find the right house.
- ? There is an annual unit need and then there is the increasing need on top of that. This must be taken into consideration. Need 15,000 rentals for 2010 just to keep up with annual demand. People are leaving the area because there is nowhere to live.

- ? Tax Credit \$7-\$8/ for every \$1 local, 10% for those with disabilities
- ? Greatest need is to help renters as some are paying 75% of income
- ? Boarding houses for singles was suggested – are there, anymore? – Can provide companionship, shared maintenance, quality living, safety and would work well for the mentally ill with proper oversight. Are there any models? Group homes may have some similar components.
- ? Should subsidized home buyers be prohibited from selling for big profit so their homes are not affordable? The house was purchased with a 20% loan, and it appreciates in value so there is equity built. If one sells home for a profit, MHO gets 20% of the sell price. Everyone makes money.
- ? The lowest investment per unit will allow the most units to be built, rented etc. and also depends on how many years it will be affordable. The lower the household income, the more subsidy needed.
- ? It is important to target the resources to create measurable impact and any spill over. This is effective use of public funds. Streets, water, sewer fixed, this leverages more improvement.
- ? Energy is a big part of the equation – smaller house is easier to heat
- ? Housing safety and preservation for elderly – an emergency \$3000 repair can save lives, save more costly repairs down the line and save the home. This is well worth it.

Brevard Public Meeting, April 14, 2010

Attending: Doyle Stubblefield, D. Carroll Parker, Mark Burrows; Staff: Jeff Staudinger

The group reviewed both the draft Consolidated Plan priorities and the proposed 2010-2011 Action Plan. Comments reiterated the need for affordable housing throughout Transylvania County. Support was expressed for the HUD 202 development in Rossman. Carroll Parker provided an update on the work of the Transylvania County Community Land Trust.

Marshall Public Meeting, April 15, 2010

Attending: Steve Garrison, Jerry Plemmons, Sonja Plemmons, Rick Molland, Jane Jatinen, Karen Kiehna, Betty Hurst. Staff: Jeff Staudinger.

The group reviewed both the draft Consolidated Plan priorities and the proposed 2010-2011 Action Plan. There was a general consensus that continuing the housing rehabilitation program (a partnership between the County and CHC of Madison County) should be the highest priority. The need for affordable rental housing was discussed. The sense of the group was that while needed, it would take more capacity than is currently available to develop it. The RCDI grant will help build that capacity.

Hendersonville Public Meeting, April 22, 2010

Attending: Ken Perkins, Patrick Kennedy, Sheryl Fortune, Werner Behley, Bill Burdett; CD Staff: Jeff Staudinger.

The group reviewed both the draft Consolidated Plan priorities and the proposed 2010-2011 Action Plan. The priorities of the new Five-Year Plan seemed appropriate. Werner sought to understand better the process of developing tax-credit rental housing, and commented that Habitat was considering activities in addition to building single-family housing.

Final Public Hearing at Asheville City Council Meeting - April 27, 2010

No public comments were made about the Consolidated Plan.

Written Comments

One written comment was received. In summary, The writer indicated that he believed "limited grant funds should be used to build MORE housing units, and this obviously means that the units would be of lower quality, meaning smaller, colder, darker, higher density, with less parking, and most importantly, OLDER, as more of the funds should be used to buy existing, often deteriorated homes and subdivide them into more units. This especially includes homes containing lead paint, which should be left there unless they are for children under 8." He additional thought that "Zoning must not be allowed to interfere with unit density, absence of parking, or the subdivision of larger homes into more units, anywhere."

A complete report of all comments made at the focus groups and public hearings is has been maintained and is available upon request. Written comments were invited during this planning process.

Presentation of the Draft Plan

The draft Consolidated Plan was published on the City of Asheville's internet website and a notice of publication was placed in the Asheville Citizen Times on March 28, 2010. Copies of the plan in printed form and on compact disk were made available on request.

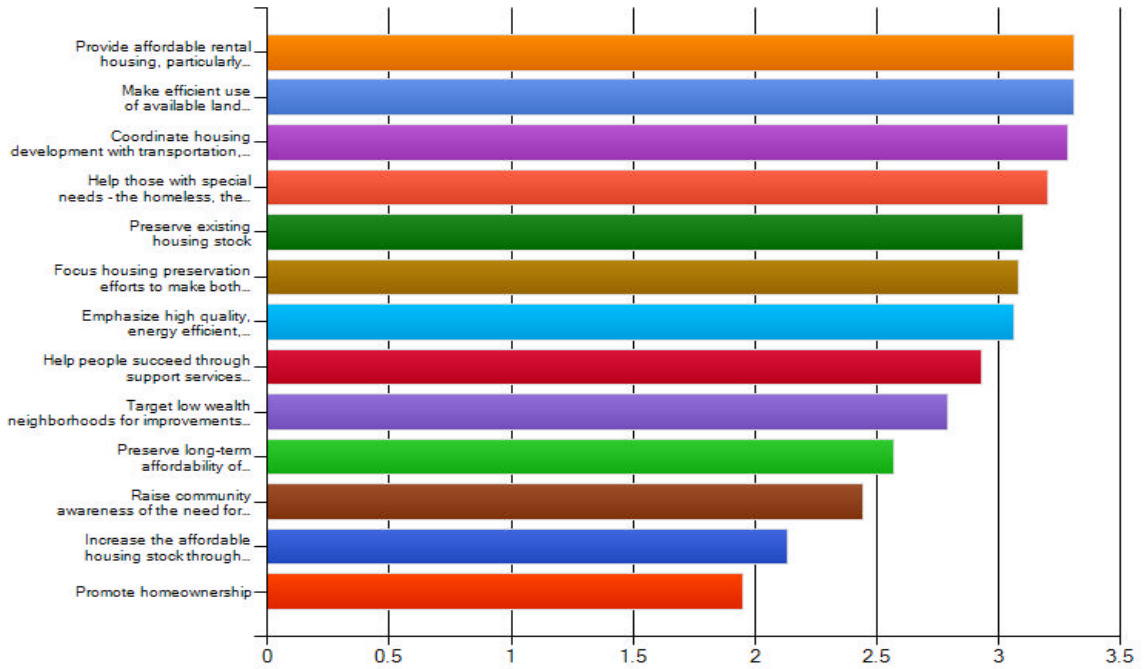
All agencies and individuals participating in the focus groups and public meetings were notified of the publication and invited to comment, as were all who expressed interest in the process, or were on email lists maintained by the city Community Development Division. Additionally, links to the published Plan were sent to each Consortium Member Government with a request to post the links to their web sites.

Internet Poll

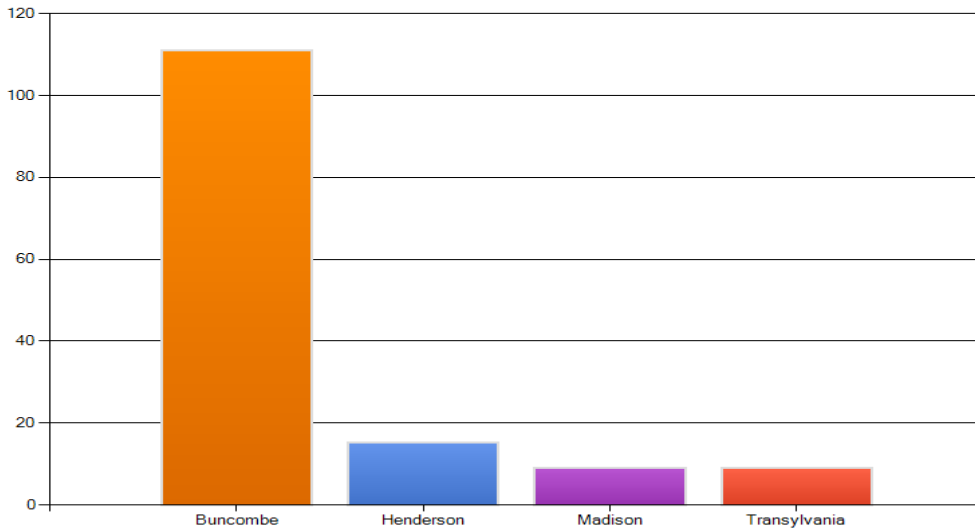
Additional input was sought via two on-line surveys conducted during the month of March, 2010. These surveys sought community input into the housing priorities of the Plan for each county, and into the non-housing community development priorities for the City of Asheville. We received 149 responses to the housing survey, and 79 to the non-housing survey. The Consortium Board used the collected information as a resource in setting the priorities for the Plan.

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Listed below are the draft housing priorities for the Asheville Regional Housing Consortium for 2010-2015. Please rate the importance for your county for each draft priority.

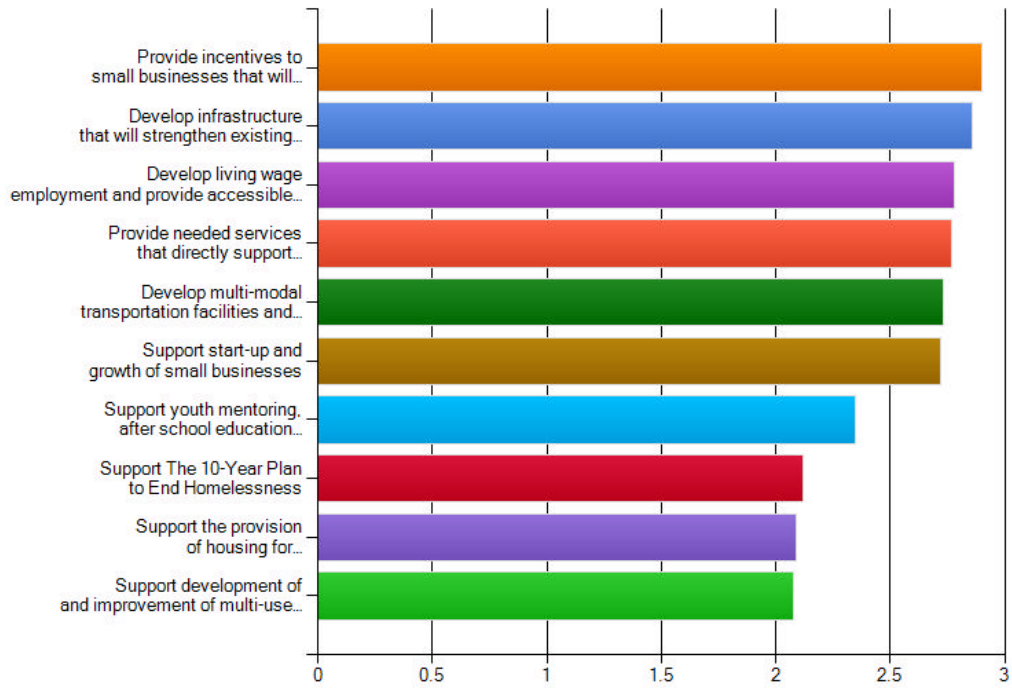


Please indicate which County you are responding from.

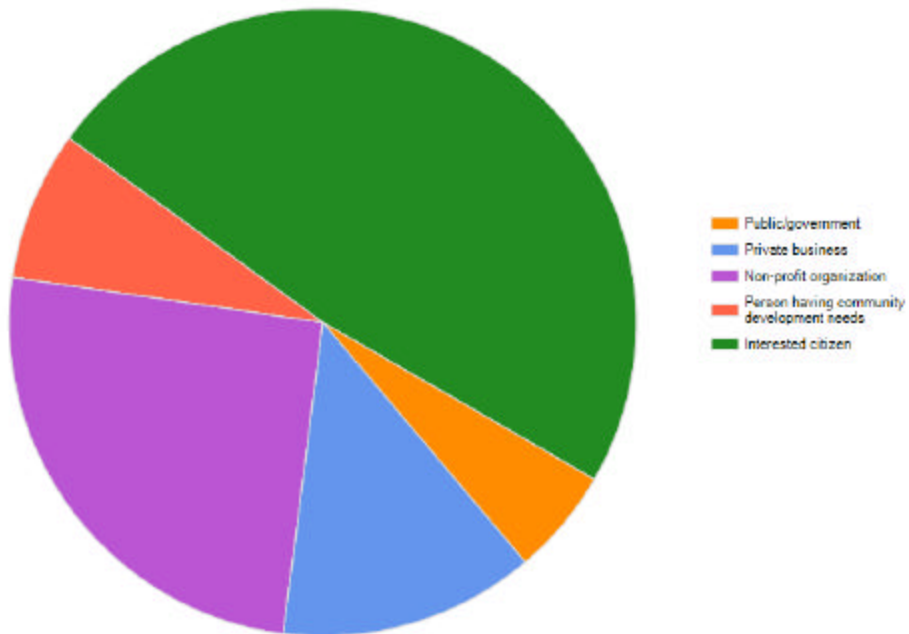


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Listed below are the draft non-housing priorities for the City of Asheville Community Development Program for 2010-2015. Please rate the importance for each draft priority.



From which viewpoint does your primary interest in community development arise?



Comments Received

No additional written comments were received. As the result of the public meetings and Consortium Board process, minor changes in the order of priorities were made for Madison County, and minor changes in wording of strategies were made for Buncombe County. These comments were incorporated into the final version.

Final Public Hearing

The final public hearing on the draft Strategic Plan was held in front of Asheville City Council on April 27, 2010. No comments were made by members of the public.

APPENDIX D

ANTI-POVERTY STRATEGY (ASHEVILLE)

Introduction

HUD’s regulations for the Consolidated Plan require that it describe “the jurisdiction’s goals, programs, and policies for reducing the number of poverty-level families”. This appendix contains a summary of the priorities and strategies that are intended to impact the number of people living in poverty within the City of Asheville. An assumption has been made that “poverty-level” income is roughly equivalent to income below 30% of area median income (AMI).

Priorities and Strategies Impacting the Number of People in Poverty

Reference	Summary
Affordable housing priorities and strategies	<ul style="list-style-type: none"> ? Provide affordable rental housing particularly for very low income households <ul style="list-style-type: none"> o Maximize use of LIHTC funding o Support non-profits developers who can serve very low income people o Build one-bedroom, efficiency and SRO units o Provide homeless prevention and rapid re-housing services for families in crisis ? Help those with special needs – the homeless , the frail elderly, and people with disabilities <ul style="list-style-type: none"> o Leverage S.811 and S.202 funding o Encourage accessibility for disabled occupants and “visitability” for guests o Support group homes that provide housing and support for mentally-ill persons ? Preserve existing housing stock through rehabilitation <ul style="list-style-type: none"> o Support emergency repair programs o Use volunteer efforts to rehabilitate housing ? Help people succeed through support services coordinated with housing development
Homelessness	? All listed strategies and targets

<p>Non-Housing Community Development</p>	<ul style="list-style-type: none"> ? Develop living wage employment and provide accessible job training and placement for such employment <ul style="list-style-type: none"> o Recruit training participants from low-wealth neighborhoods o Focus training on sectors that promise greatest living wage job growth o Monitor Section 3 performance on all funded construction projects o Support youth employment and job training o Provide life-skills training and coaching for low income persons ? Provide services that support affordable housing, public transport, youth services and employment opportunities <ul style="list-style-type: none"> o Increase public transportation hours and frequency o Assist the elderly with accessing needed services o Life skills training for LI persons o Increase accessibility of services for elderly o Transportation and child care for people in job training o Substance abuse treatment o Community policing efforts to empower LI residents to take control of their neighborhoods ? Provide infrastructure to support affordable housing, transportation, and economic development <ul style="list-style-type: none"> o Sidewalks and bicycle paths for neighborhood connection and access to public transport, jobs, and services o Enhance public transportation facilities and services in low-income neighborhoods o Incentives for inclusionary zoning ? Support start-up and growth of small businesses <ul style="list-style-type: none"> o Access to capital for small businesses o Entrepreneurship training and technical assistance
<p>Support 10-Year Plan to End Homelessness</p>	<ul style="list-style-type: none"> ? Fund the coordination of the 10-Year Plan to end homelessness ? Build capacity for permanent supportive housing and support services for homeless persons (as outlined in the 10-year plan) ? Provide transportation for people experiencing homelessness ? Provide employment and employment supports

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	<ul style="list-style-type: none">? Support mental health and substance abuse services? Assist in obtaining eligibility for benefits (such as disability, social security, veterans, etc.)? Provide tenant-based rental assistance and housing stabilization services? Increase the availability of substance abuse treatment? Provide legal assistance to people likely to become or remain homeless because of limited housing options
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APPENDIX E

SELECTION AND MONITORING OF SUBRECIPIENT PROGRAMS

Introduction

Most of the programs funded with CDBG and HOME are not carried out by the City of Asheville or other Consortium member governments, but by non-profit agencies. Many of these agencies have been referred to in the sections of this Plan that describe “Institutional Structure”. Our area is rich in capable and innovative non-profit agencies.

The technical term for these agencies when they use CDBG or HOME funds is “subrecipient”. Some subrecipients qualify to be treated as Community Housing Development Organizations (CHDOs), which gives them greater latitude in their use of HOME funds. Some qualify as Community Based Development Organizations (CBDOs), which gives them greater latitude in the use of CDBG funds. Whichever category they fall into, the City of Asheville has an obligation to ensure that subrecipients use their CDBG or HOME funds to address the priorities in the Consolidated Plan and to do so efficiently, effectively, and in compliance with HUD regulations and with any local conditions placed on their programs.

Allocation of Funding

The allocation of CDBG and HOME funds is a difficult process. Requests for funding always exceed the funds available. The City endeavors to make the allocation process as fair and transparent as possible, and to protect Council Members from the intense lobbying that accompanies this process in some localities.

The application process opens up in late fall each year and all applicants are required to complete an application form by a due date at the end of January. Staff evaluate applications using an evaluation tool which assigns points for the extent to which the proposed project addresses Strategic Plan priorities, its feasibility and effectiveness, and the agency’s capacity to carry it out. The evaluation scores are used for information in the allocations process, but are not the sole determining factor.

Recommendations for CDBG funding are made by the City’s Housing and Community Development Committee. Recommendations for HOME funding are made by the HOME Consortium Board. However, in the case of HOME, all participating governments are assigned a “planning level” funding allocation, and the Board pays special attention to the preferences expressed by local governments as to the use of funds in their locality.

Final approval of the CDBG and HOME allocations making up the annual Action Plan is the responsibility of Asheville City Council.

Grant Agreements

The City executes a formal grant agreement with each subrecipient. The grant agreement includes standard requirements for compliance with HUD regulations, and also sets out a description of the work that the subrecipient will undertake, the performance targets it expects to achieve, and the budget for using CDBG or HOME funds. This grant agreement has the force of a legal contract and is the City's primary tool for ensuring accountability in the use of funds by subrecipients.

MONITORING POLICY

Purpose

1. Ensure that agencies receiving CDBG or HOME funds (including subrecipients, CBDOs and CHDOs) comply with all regulations and requirements governing administrative, financial and programmatic operations of the CDBG and HOME Programs.
2. Determine, in particular, that the agency is maintaining adequate documentation of client eligibility for CDBG or HOME assistance
3. Ensure that agencies perform the Scope of Services detailed in their contract and achieve their project performance target and outcomes within the established schedule and budget.
4. Confirm that agencies are taking appropriate actions when performance problems arise.
5. Utilize monitoring and technical assistance tools to help agencies improve the efficiency and capacity of their organization and operations.

Scope of Monitoring

All agencies will be monitored using one or more of the following methods:

Progress Reports

Progress reports are required of all agencies based on the Scope of Services specified in their funding agreement.

Progress reports are to be submitted either monthly or quarterly. The agency agreement will specify the required reporting periods. Reports will include the following:

- ? Data on the status and accomplishments of their project(s) including the number of units completed and/or persons served;
- ? Program outcomes;
- ? Amount of funds expended or obligated;
- ? CDBG program income receipted and expended;

- ? Project schedule updates and any factors which adversely affect or hinder implementation;
- ? Project changes, opportunities, or new funding sources.

Desk Reviews

These are conducted by CD Staff when more specific or detailed information is needed or when potential problems are identified through progress reports or requisitions. Specific information needed for a desk review will be requested in writing and the agency will be given at least two weeks to provide the information. Desk reviews will include annual rental housing compliance reviews for HOME-assisted multifamily projects.

On-Site Reviews

On-site reviews are conducted by CD Staff for projects or agencies deemed to be high risk. High risk factors are elaborated below under risk assessment. In addition, on-site monitoring reviews will periodically be conducted for agencies with strong past performance in order to ensure long-term accountability and compliance. Three different types of on-site reviews will be conducted by CD Staff:

- 1) construction progress inspections in which the physical status of a project is reviewed,
- 2) targeted compliance reviews in which just one or two high-risk areas are reviewed, e.g. client eligibility, and
- 3) full compliance reviews in which the entire range of potential compliance issues is reviewed.

Risk Assessment

Risk factors are assessed for each subrecipient and project to determine the level and frequency of monitoring. The primary risk factors are:

- ? New agency
- ? Agency expanding operations or implementing new program(s)
- ? Compliance problems in the past
- ? Performance problems (e.g. slow-moving activities)
- ? Agency experiencing turnover in key staff positions
- ? Agency undertaking multiple activities
- ? Activity involves complex compliance issues, e.g. rental housing or economic development projects.

Procedures for Full On-site Monitoring Review

Step #1: Prepare for the Monitoring Visit

- ? Review applicable program rules, written agreements with agency, previous monitoring reports, project expenditures, and project progress reports;

- ? Schedule on-site monitoring visit. Agency will be notified at least two weeks prior to the monitoring visit. Notification will include the date of the visit, scope of the monitoring, information needed for review during the visit, and suggestion for staff that should be present.

Step # 2: Conduct the Monitoring Visit

- ? Hold entrance conference with Executive Director and/or key staff to provide an overview of the monitoring visit and answer any questions;
- ? Inspect physical progress of work (for rehab & new construction projects);
- ? Gather, review, and analyze the requested documentation;
- ? Interview staff persons as needed to collect information and gain further understanding of the project and/or organization;
- ? Hold exit conference with ED and/or key staff to report preliminary results, hear reactions and form conclusions.

Step #3: Monitoring Letter

- ? Provide a follow-up letter to agency within three weeks of the monitoring review;
- ? Explain the results of the review and when applicable set deadlines for a written response and corrective actions;
- ? Specify any technical assistance needs recognized during the review and make recommendations for the agency.

Step #4: Follow-up

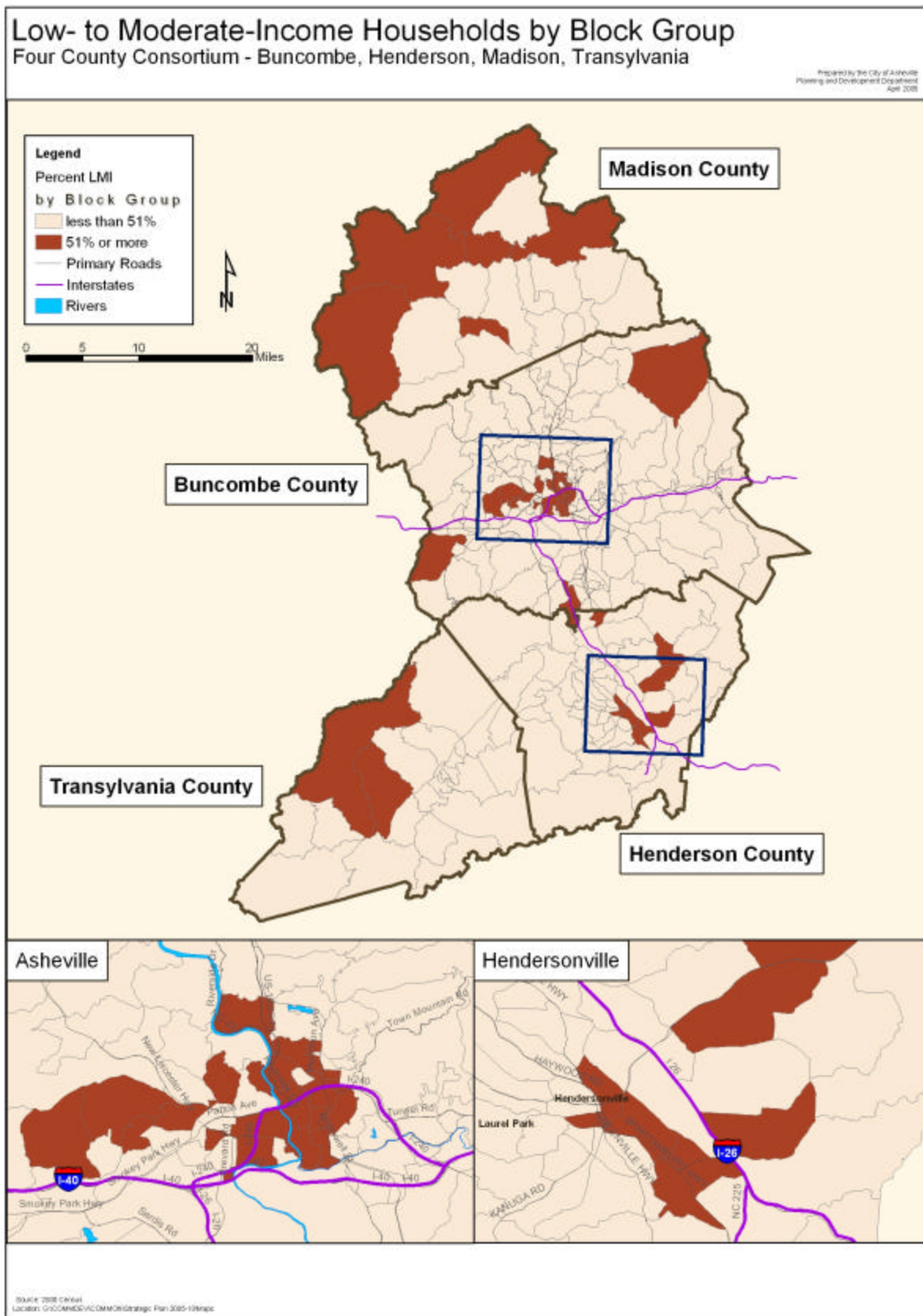
- ? Ensure that agency responds to monitoring letter in a timely manner;
- ? Provide technical assistance as necessary;
- ? If necessary, carry out further targeted monitoring to confirm that corrective actions have been implemented;
- ? In cases of serious non-compliance, delay funding draws until corrective action is complete.

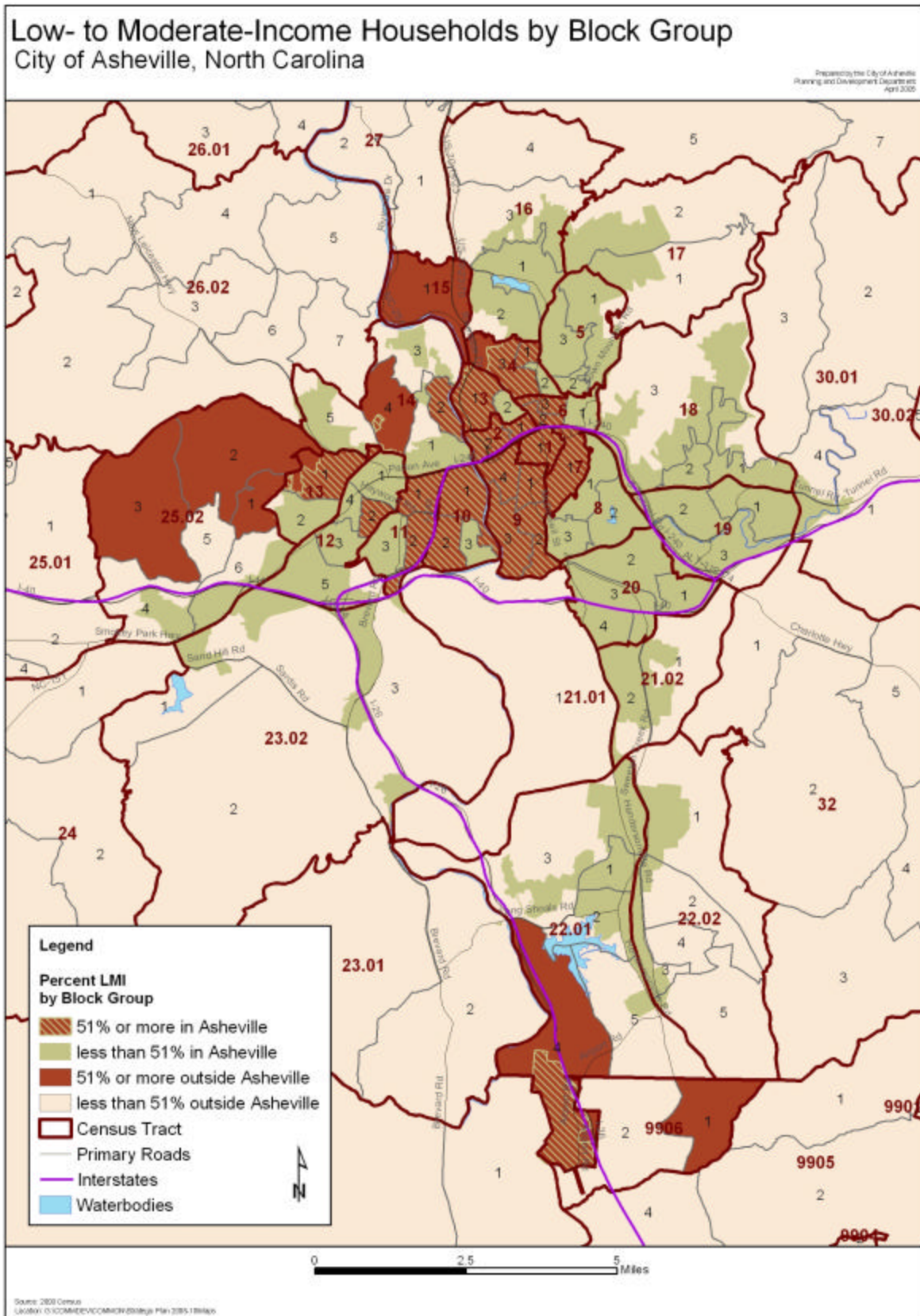
APPENDIX F

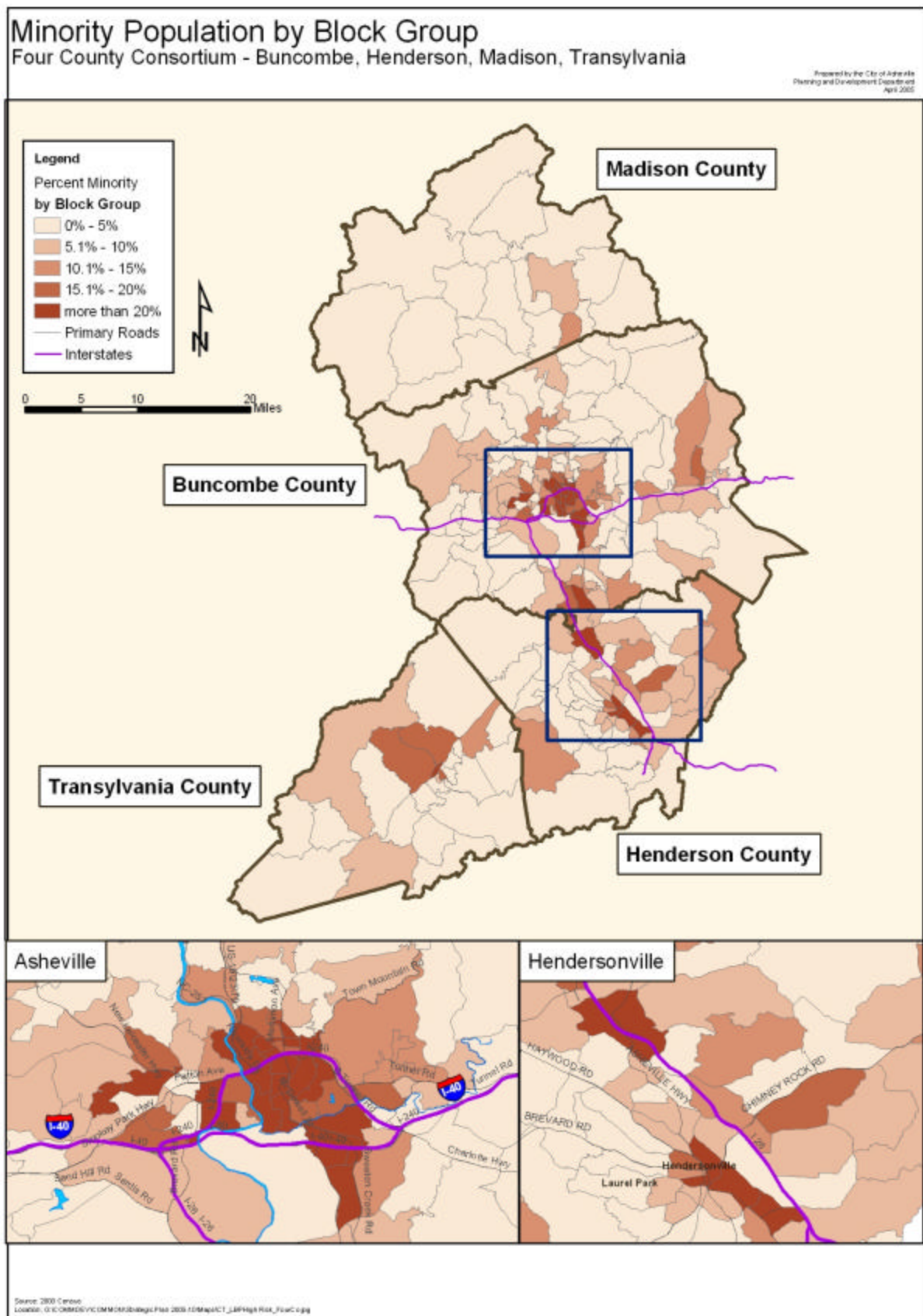
MAPS

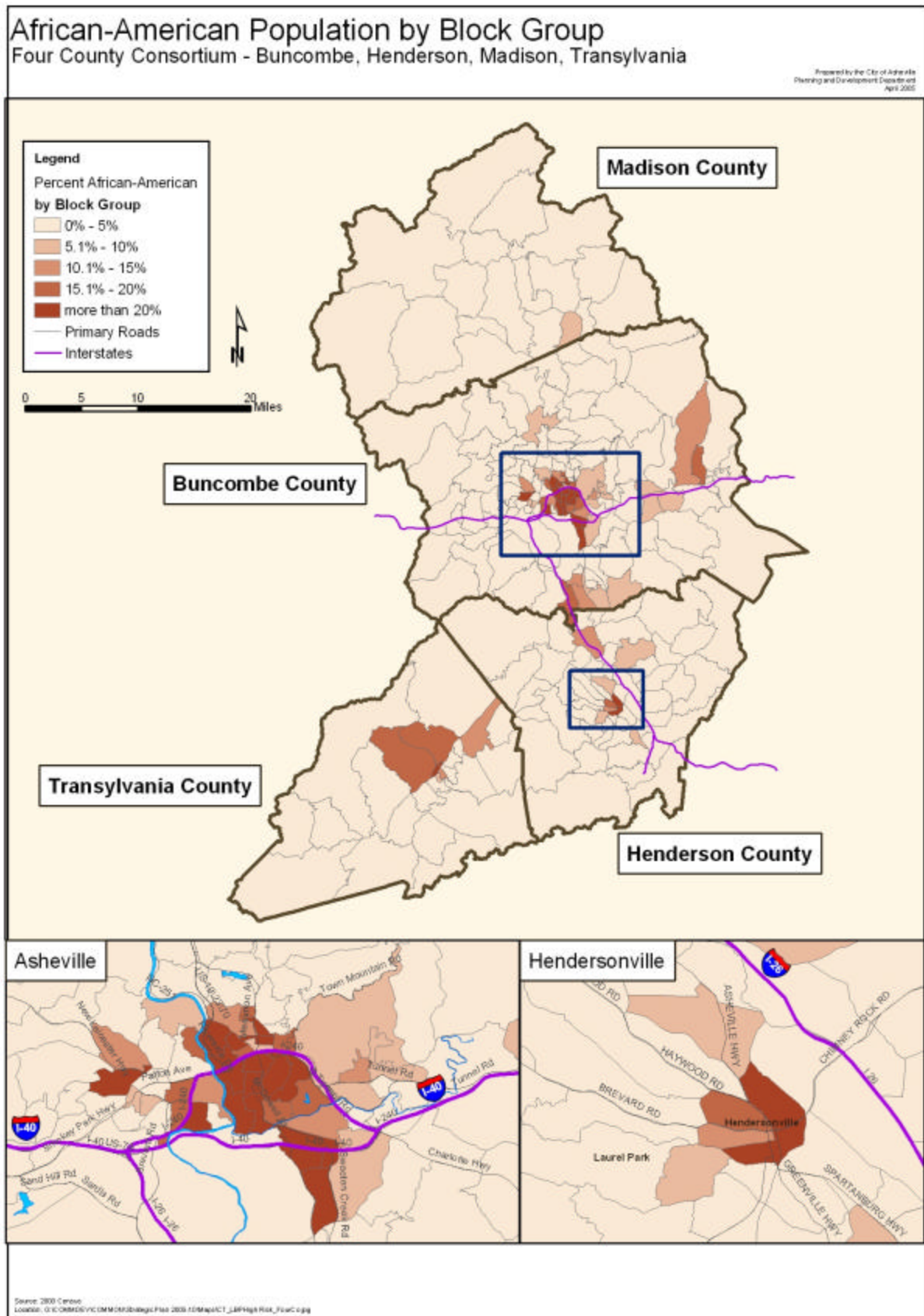
1. Low-Income by Census Block Groups – Consortium Area
2. Low-Income by Census Block Groups – Asheville
3. Minority Population Distribution – Consortium Area
4. African-American Population Distribution – Consortium Area
5. Hispanic Population Distribution – Consortium Area
6. Elderly Population Distribution – Consortium Area
7. Population Change – Consortium Area
8. Homeownership – Consortium Area
9. Homeownership – Asheville
10. Median Value of Owner-Occupied Housing – Consortium Area
11. Housing Density – Consortium Area
12. Children at Risk of Lead-Based Paint – Consortium Area
13. Public Transit Routes – Buncombe & Henderson Counties
14. Employee Density – Asheville
15. Vacant Properties – Buncombe County
16. Vacant Public Properties – Asheville

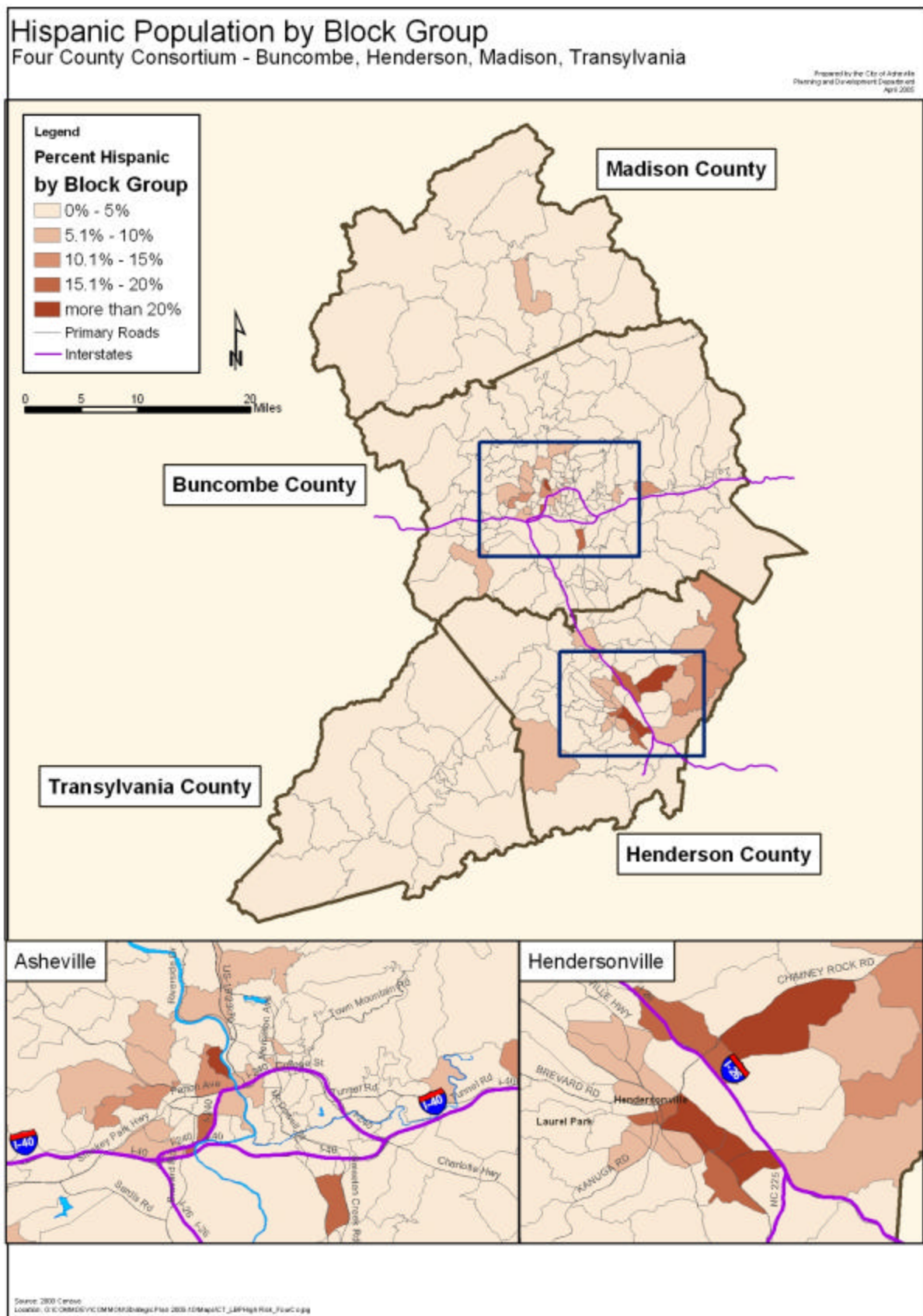
Additional maps detailing the distribution of minority populations can be found in Appendix B to the Housing Needs Assessment.

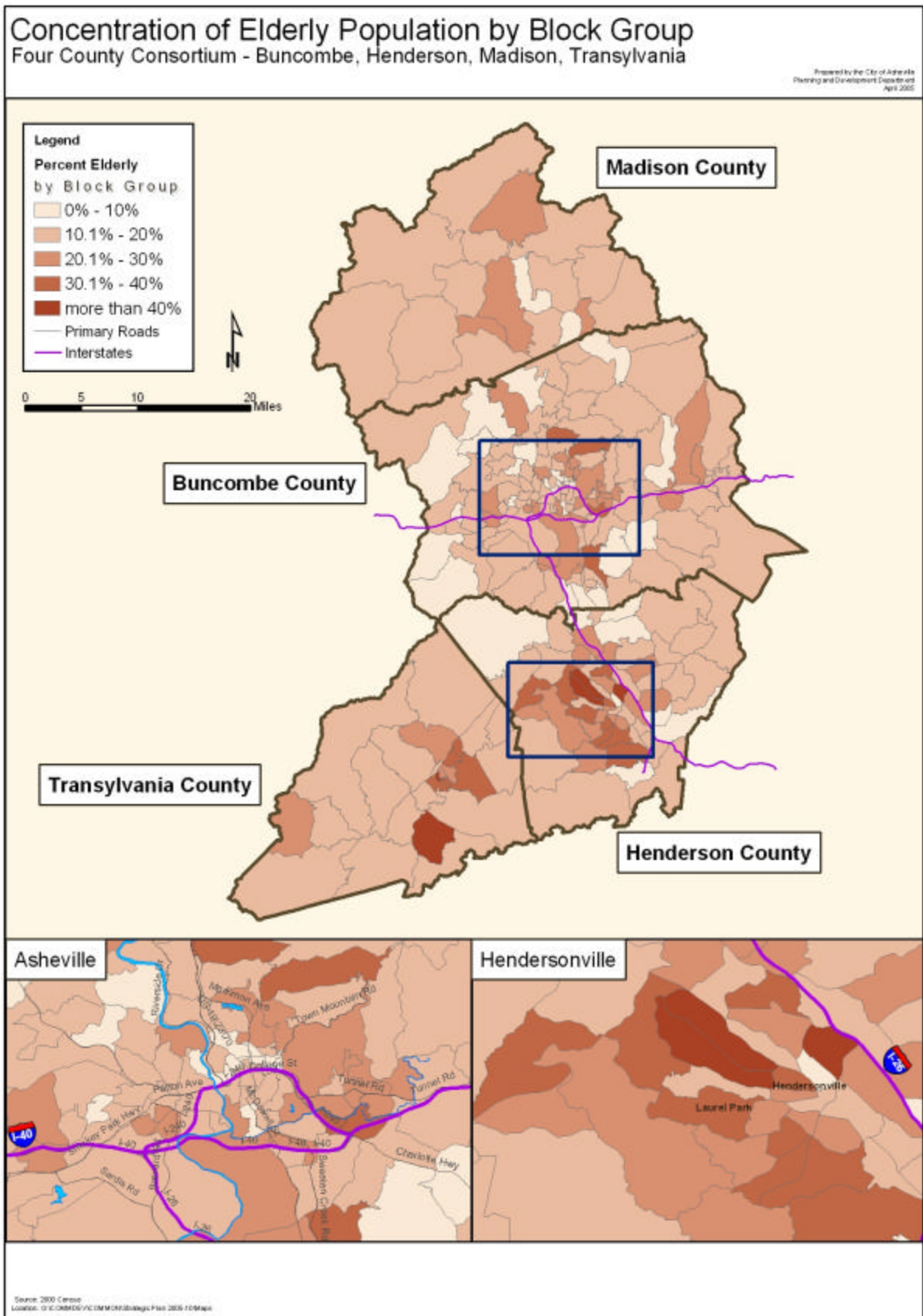


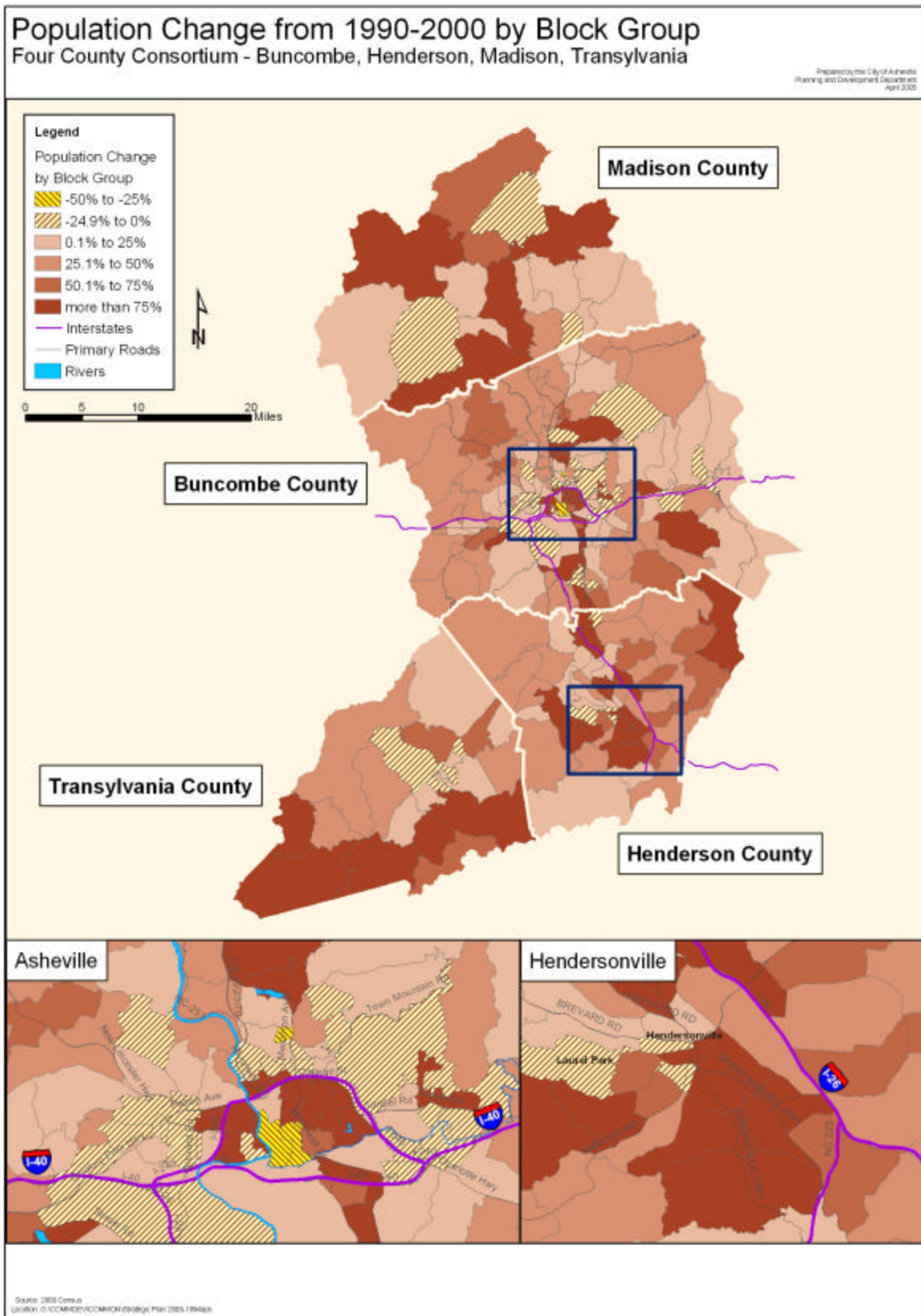


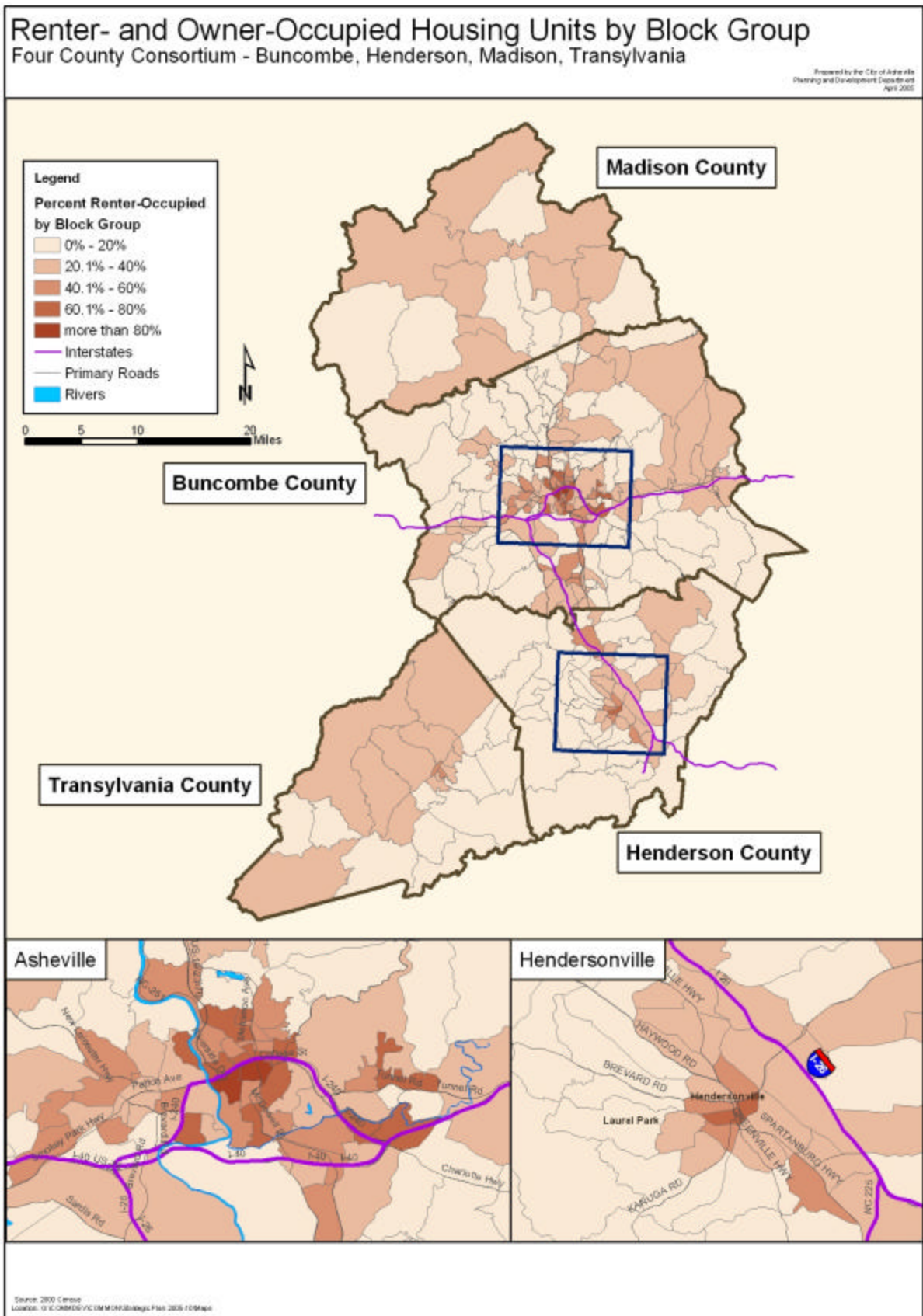


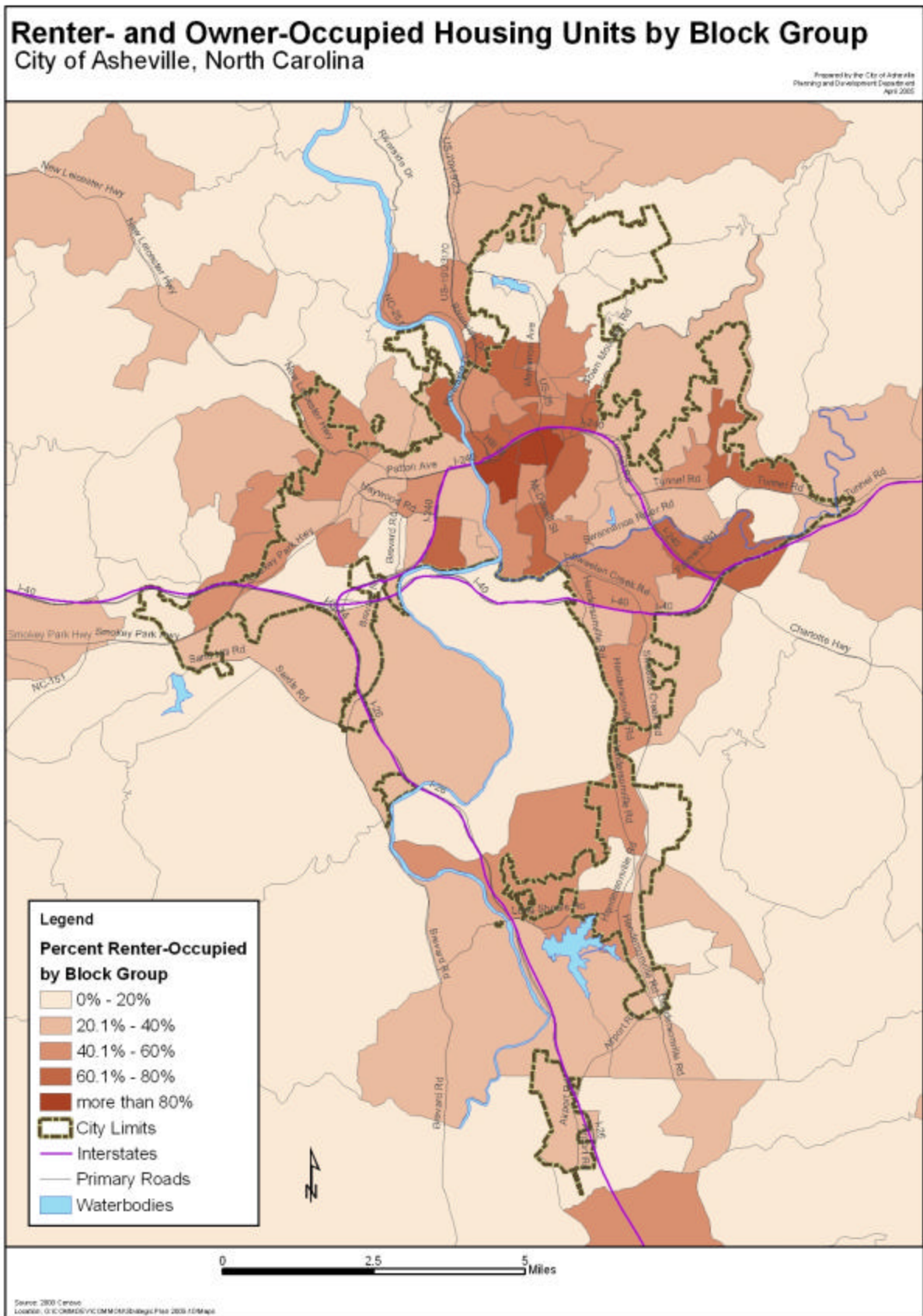


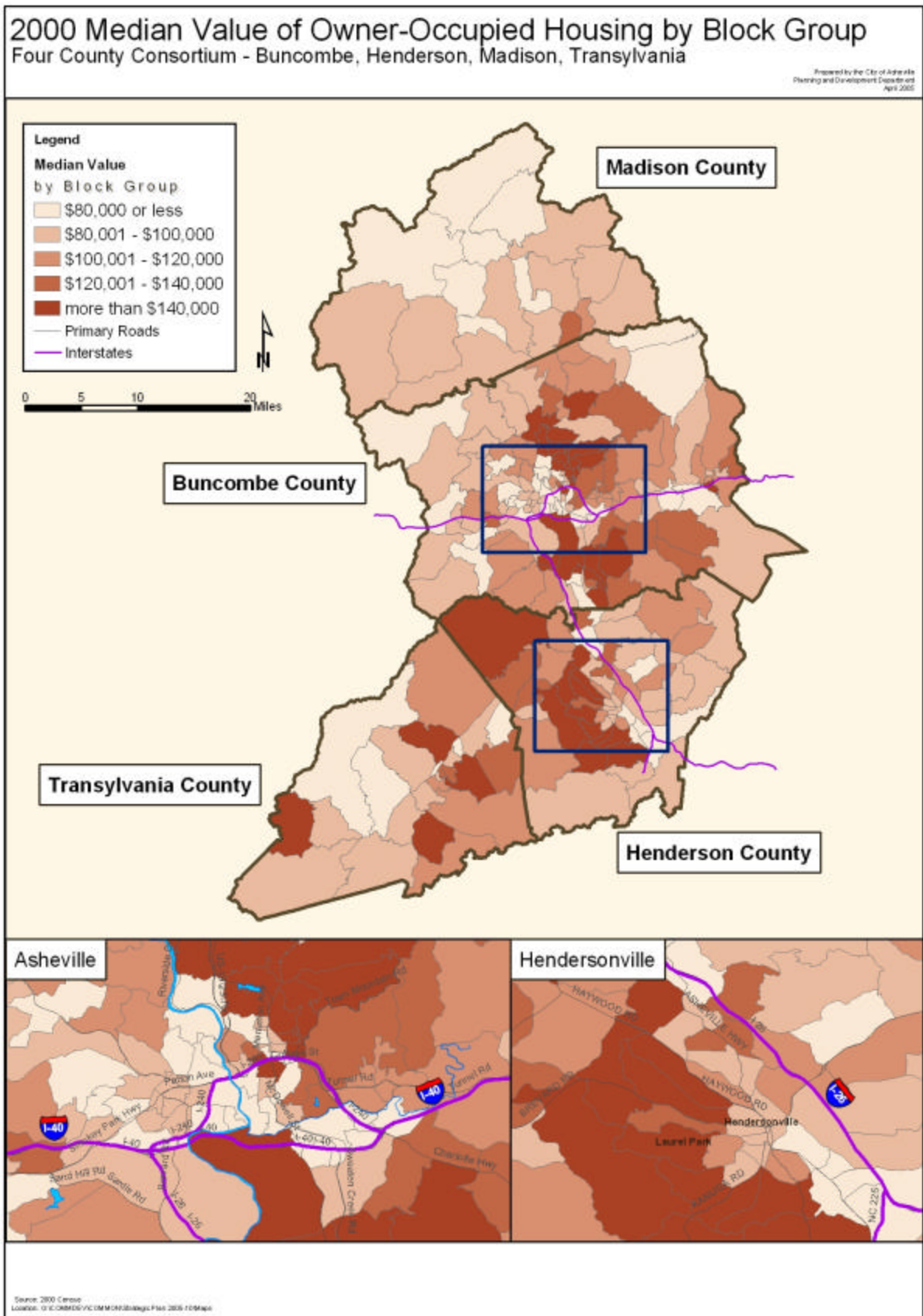


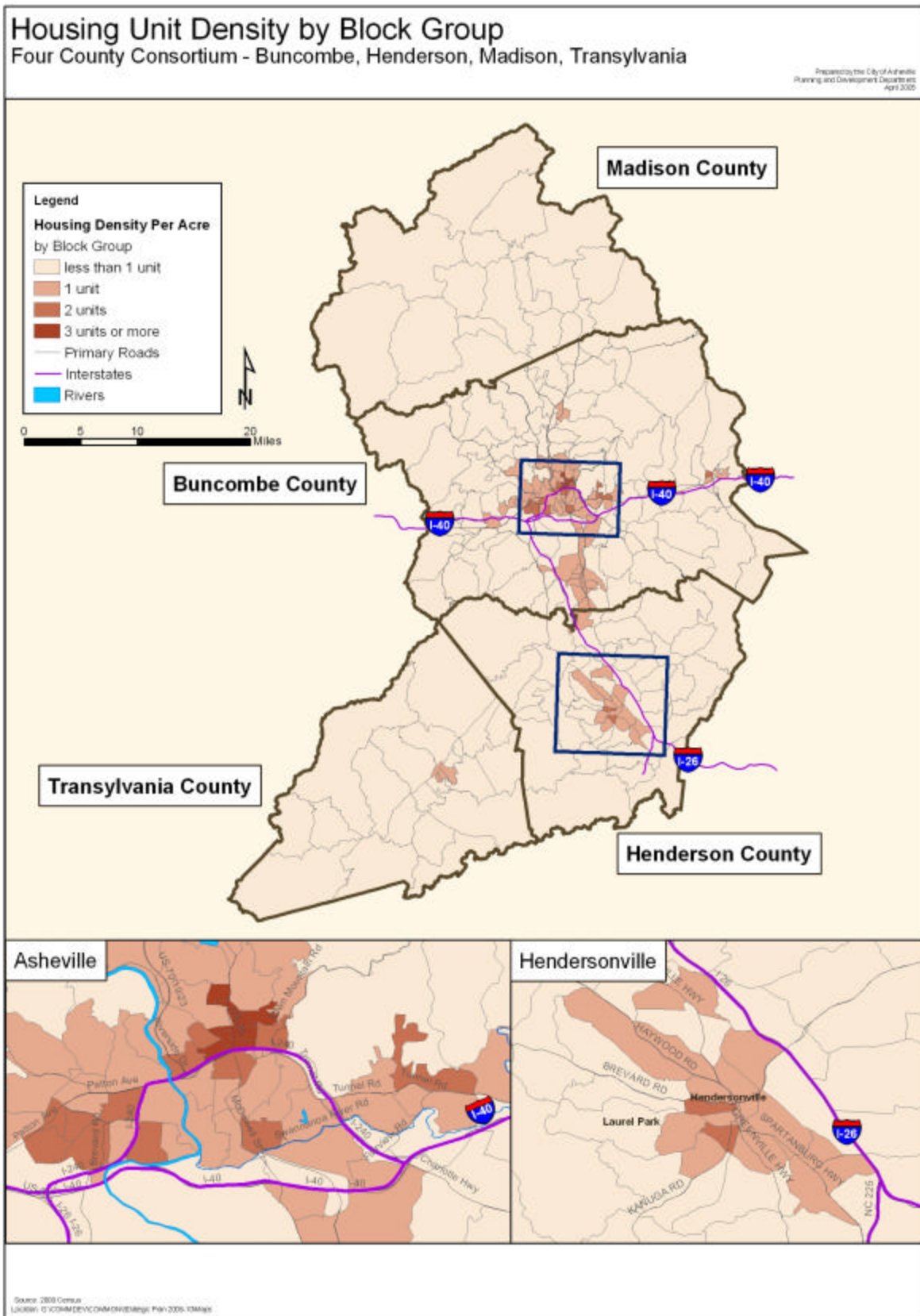


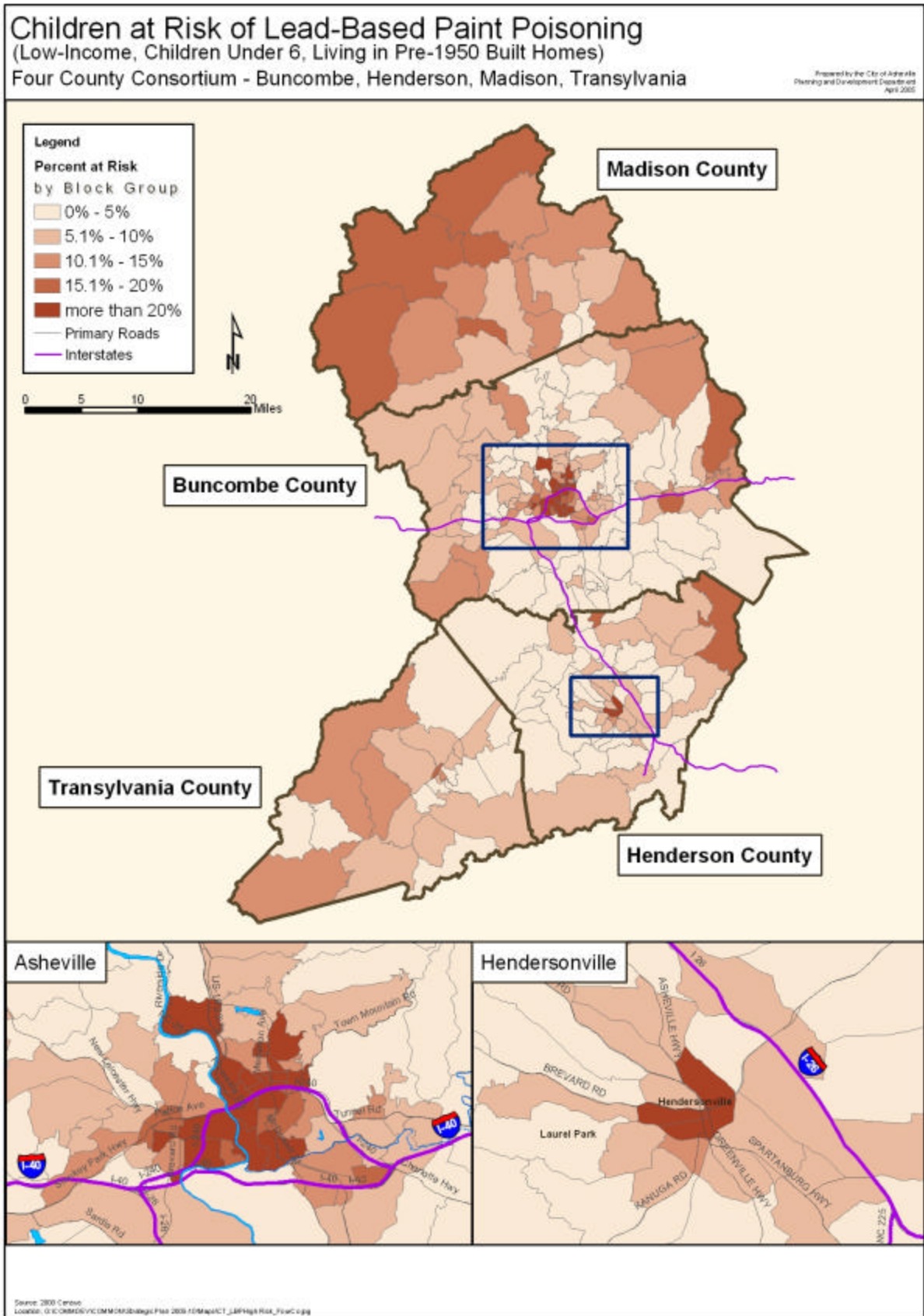


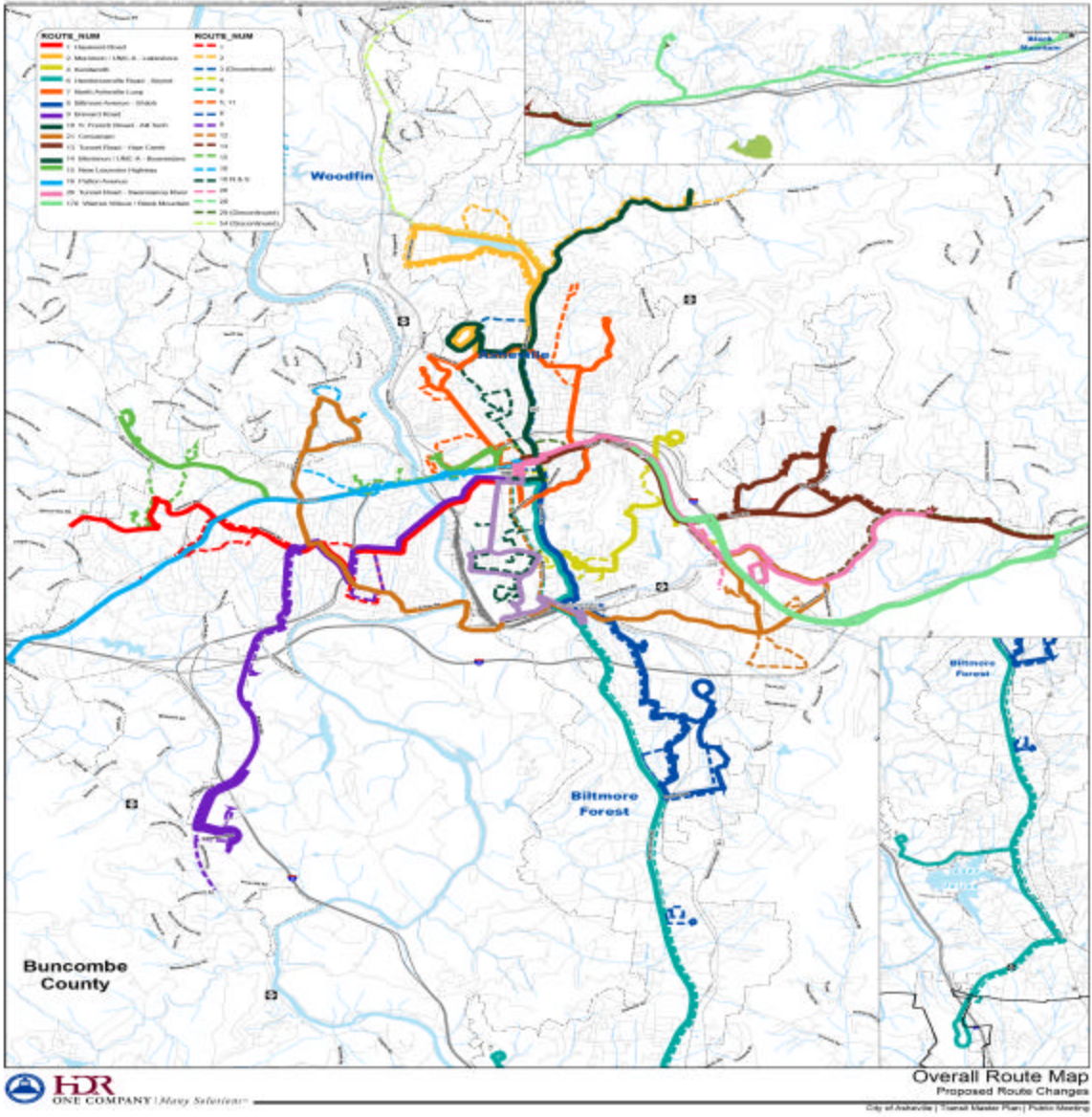


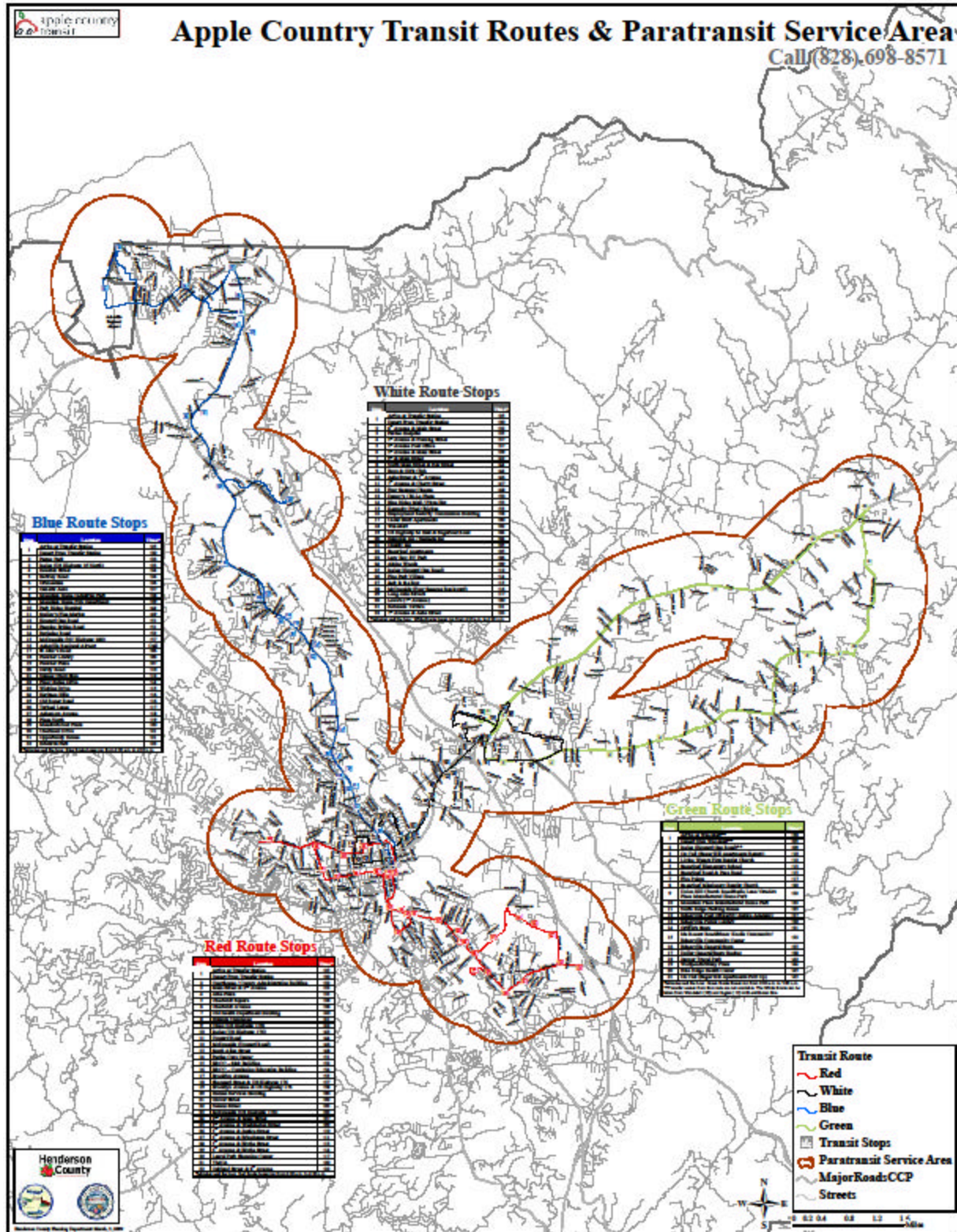


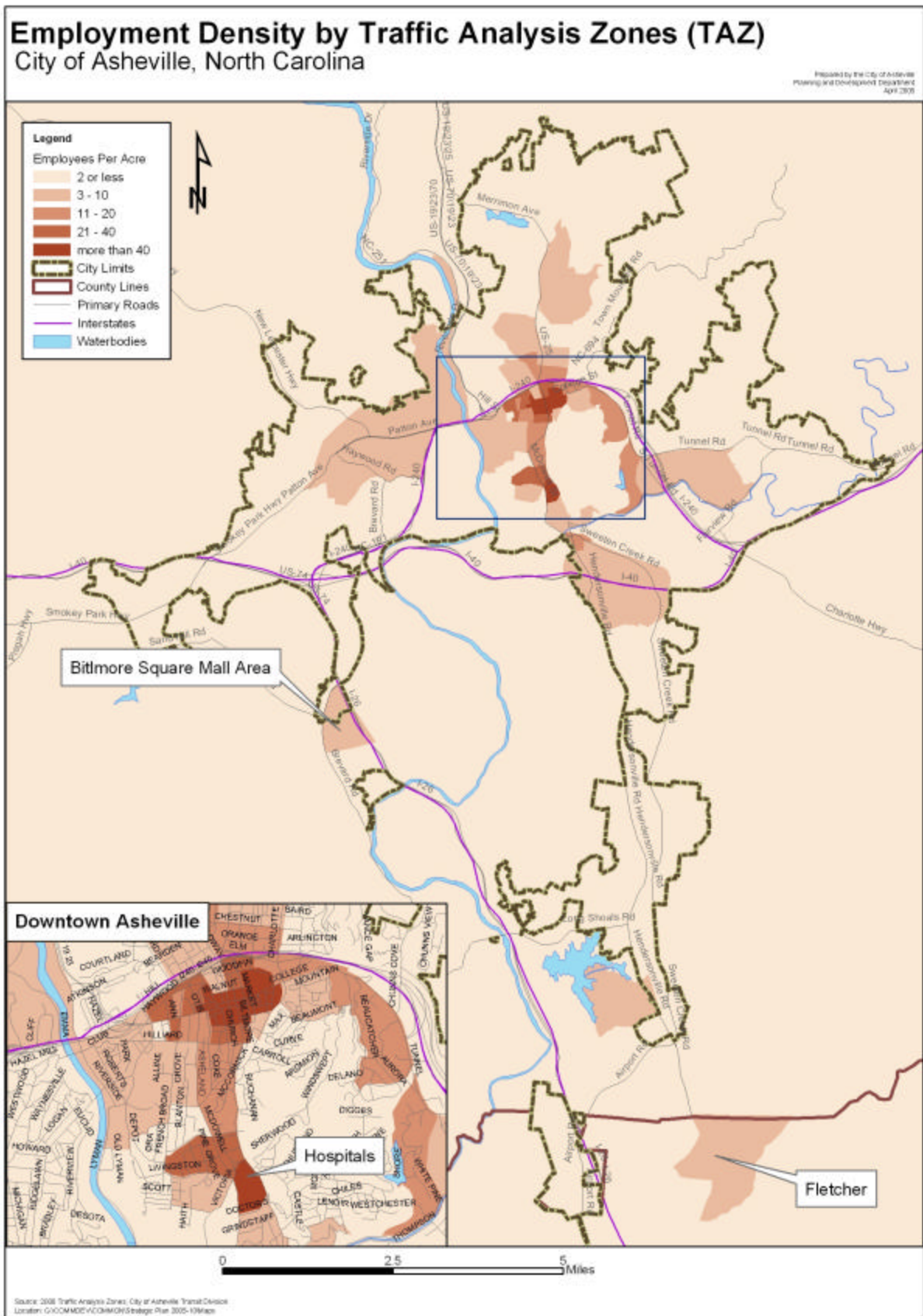


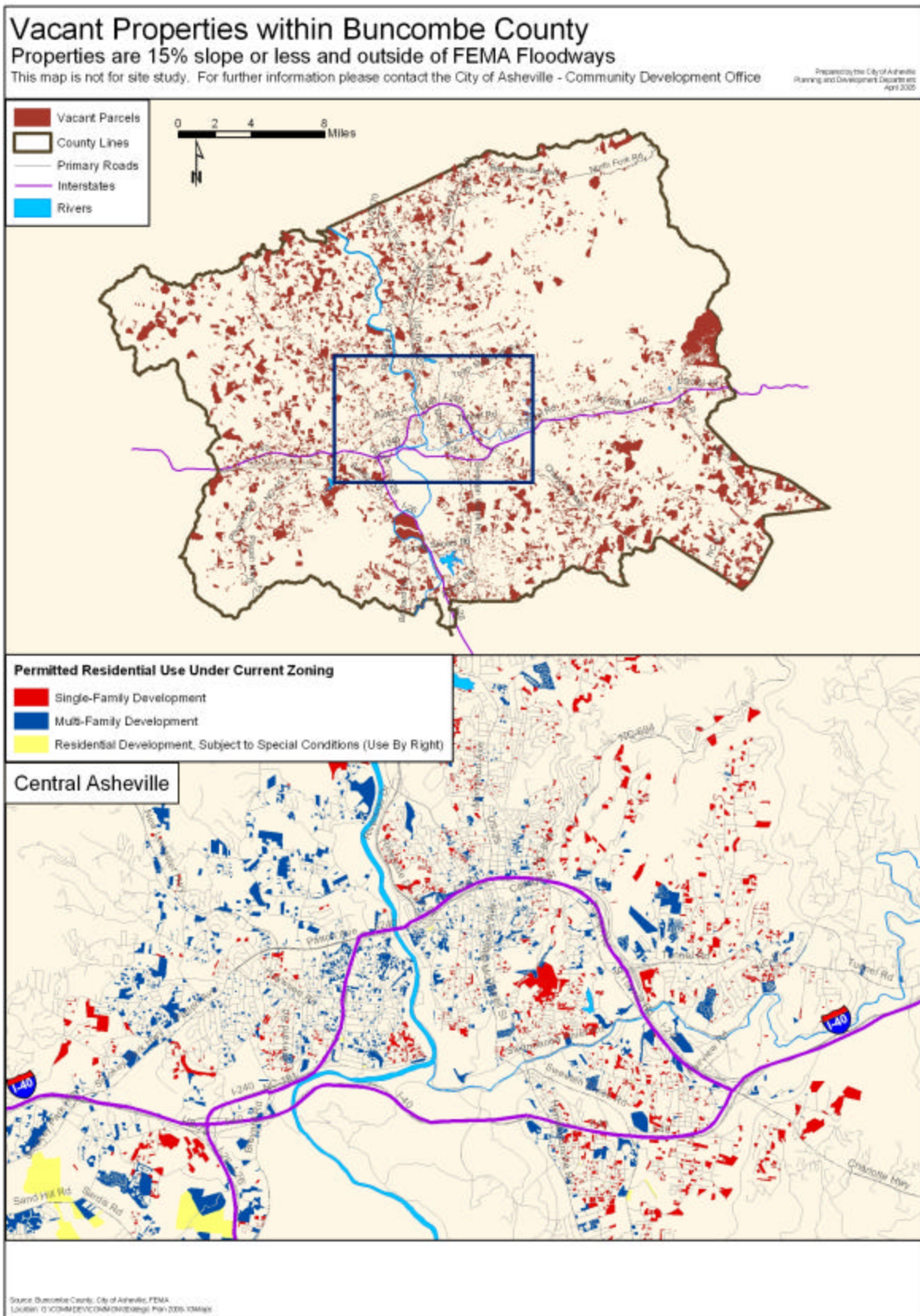












Publicly Owned Vacant Properties in Asheville Area

Includes City of Asheville, Asheville Board of Education, Asheville Housing Authority, Buncombe County and Buncombe County Board of Education - Owned Parcels

