



COMMUNITY DEVELOPMENT DIVISION

Community Development Board Meeting Minutes

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Regular Meeting of the Community Development Board

March 1, 2016

Board Members Present: Patt Leikam, Michele Zahn, Fred Button, Becky Bey, James Corson, Laura Gittings-Carlson, Bret Rutherford

Staff Present: Candi Millar, Brenda Beckett, Dina Harmon, Sandra Lopez

Board Members Excused: Kathleen Candelaria, Katrina Kruger

Guests: City Council representative Larry Brewster, Matt Lundgren, Volunteers in Service to America (VISTA) members: Ari Denson, Emily Aerts, Maddie Alpert

Welcome / Introductions / Announcements: The Community Development Board met at its regular monthly meeting located in the 6th Floor Conference Room, Miller Building, 2825 3rd Avenue North, Billings, Montana. Chair, Patt Leikam, called the meeting to order at 3:04pm. The Board was introduced to its newest member, Laura Gittings-Carlson.

Public Comment: VISTA member Emily Aerts presented her project with the Home Center, a renter workshop, and invited any interested members to become involved via donations or presentations. Maddie Alpert presented her Literacy project, Wild Words, done with the Housing Authority of Billings, and invited the Board to become involved with the project.

Meeting Minutes: Vice Chair Fred Button moved to approve the minutes from February's meeting. Jim Corson seconded and the Board approved the minutes.

Staff Reports:

- **First Time Home Buyer Program:** Staff reported that renters and lenders have been informed that funding for the First Time Home Buyer's program has been expended until the following fiscal year. Marketing for the Chamberlain property continues.
- **Foreclosure Acquisition / Housing Rehab Program:** Staff reported that the Custer property is nearly finished. Seven homeowners are still going through home repairs and no additional application have been received.
- **VISTA:** The VISTA leader reiterated VISTA information that was sent with the January Monthly Report. He also updated the Board that the newest VISTA class has just completed their first month in service and projects will be coming forward soon. In addition, a legacy project from the onset of the VISTA program to its current state is in progress to display the efforts and accomplishments thus far.

Consolidated Plan – Action Plan Review: Staff gave a presentation on what is required by HUD in order to create priority needs and develop programs. See attached. A draft of the review is due on March 27th.

CDBG/ HOME Applications: Staff reported on the CDBG and HOME applications process and steps to implementation. See attached.

Task Force Presentations: CD Board members reported on the responses they received at the neighborhood task force meetings the previous month.

Public Comment:

Guest Matt Lundgren arrived and introduced himself as Chairman of the Southside Task Force. He expressed concern that the Southside Task Force often did not get a voice on where CDBG money is directed, or a chance to vote on what their priorities are on the rankings sheet. Lundgren admitted not being able to complete an application that would express the needs of the Southside Task Force, and that he had urged his members to write in their priority needs on the rankings sheet—a bathroom on the South Side of town—instead of choosing from the available options. Millar asked CD Staff if applications would have been presented to the Task Forces, including the Southside Task Force, as an option in the rankings had an application been submitted, to which CD Staff responded that they would be. Millar then encouraged Lundgren to submit an application, as that would ensure that the potential program would appear on the rankings sheet and have the option to be voted on. Lundgren questioned why the Task Forces were not part of the ranking process if they were established to help determine where funding would be dispersed, to which Millar reminded him that they are part of the process and do contribute to that decision. Leikam reminded the Board that the Task Forces rank program applications submitted and asked Lundgren if he meant he wanted to be part of the priority. Lundgren stated that those Task Force officers that made an attempt at submitting an application were met with many barriers, such as the long, technical application, substantial paperwork, and collaborating with other city departments. They believed a bathroom would be a priority for the Southside and a good use of funds, not much different than allocating funds directly to non-profits around town, which Lundgren claims other communities have done.

Council Representative Brewster suggested Lundgren consider bringing his plan for the Southside bathroom forward during the Capital Improvement Plan (CIP) process, to which Lundgren responded that three to four council members had made the suggestion before. Lundgren then questioned if the council decision to terminate the allocation of grants to non-profits was public record, to which several board members replied that it was and would have been in April 2012. Brewster said he was present during that decision and reiterated that the more appropriate channel for this kind of request would be through the CIP, funded through the parks district. Lundgren then stated that he was aware of that option, however that in other communities (none specified), money was allocated directly, which is how the Task Force was attempting to make their bathroom a priority. Brewster suggested that instead of trying to only apply for CDBG funding, the Task Force could attempt to apply for both CDBG and CIP funds, which Leikam reminded everyone, was already mentioned at the most recent Southside Task force meeting. CD Staff then handed out HUD regulations on how CDBG funding was to be dispersed according to their guidelines, and reiterated that HUD now requires several assessments to show a need in the community prior to any release of funds for any project.

Neighborhood Concerns and Happenings: Zahn informed the board there would be an Easter egg hunt on the 26th. Button and Zahn reminded everyone that the Family Promise day center opening would be that Friday from 12-2pm. Button also informed the Board that United Way has just hired a VISTA alum as a volunteer coordinator.

January Meeting: Patt Leikam adjourned the meeting and reminded the room that next meeting is set for April 5th.

Determining CDBG Eligibility for a Public Facility

Replacement of Other Government Funding

HUD policy prohibits the use of CDBG funds to supplant local government funds. CDBG funds may not replace local general government funds on projects communities should underwrite, regardless of whether grant dollars are available.

- **24 CFR 570.207(a)(2):** Expenses required to carry out the regular responsibilities of the unit of general local government are not eligible for assistance.
- [Office Inspector General Audit & Finding, 2008](#): Maintenance of Effort is included in the Housing and Community Development Act of 1974 and the purpose is to ensure federal assistance results in an increased level of program activity, and that the grantee does not simply replace local government dollars with federal dollars.

Low Income Benefit

The [delineation of service areas](#) for the purpose of determining whether low income persons will be the principal beneficiaries of an activity involves a substantial amount of judgment. Mere location of an activity in a low income area, while generally a primary consideration, does not conclusively demonstrate that the activity benefits low income persons.

HUD-supplied census data must show the service area benefit is greater than 51 percent low income households and at least 70 percent of CDBG expenditures must benefit low income persons or households. Use of alternative statistics, such as Donnelly Demographic data, is not acceptable to HUD. The only acceptable alternative permitted by the regulations to identify the percentage of low income residents of census areas is a HUD-approved survey. Without a HUD-approved survey, HUD-supplied census data constitutes the sole basis for determining area benefit compliance.

In the case of an area benefit activity, this means that the area served has to be determined upfront as well as that the area contains a sufficiently high percent of low income residents. For this purpose, there can be only one service area. While the area might be comprised of several geographic components, the activity must qualify on the basis of the percent of residents in the entire service area who are low income.

If the facility is used as the site of frequent festivals or other public events, the Billings city limits would be considered the service area for the facility. In this instance, the overall low income percentage for the city [would have to qualify as low income](#).

Service Area Designation

Cities may not revise service areas simply to justify the qualification of a service area. It is the grantee's responsibility to ensure compliance with national objective requirements prior to funding an activity.

In [designating the service area](#) for a particular activity, the City should take into account 1) the nature of the activity; 2) the location of the activity; 3) accessibility (e.g., geographic barriers, user fees, hours service is available); and 4) comparable facilities or services. The results of this analysis should then be

applied against the appropriate Census block groups or tracts. However, HUD is responsible for determining whether the grantee correctly identified the service area of the activity, for determining whether the most accurate Census area(s) was used to calculate benefit and for approving the methodology used to conduct a survey if the City chooses to use one in lieu of the Census data.

Nature of Activity: In [determining the boundaries](#) of the area served by a facility, its size and how it is equipped need to be considered. For example, a park that is expected to serve an entire neighborhood cannot be so small or have so little equipment (number of swings, slides, etc.) that it would only be able to serve a handful of persons at any one time. Conversely, a park which contains three ball fields, or a ballfield with grandstands that can accommodate hundreds of spectators, could not reasonably be said to be designed to serve a single neighborhood. The same comparison would apply to the case of assisting a small, two-lane street in a residential neighborhood versus that of assisting an arterial four-lane street that may pass through the neighborhood but is clearly used primarily by persons passing through from other areas.

Location of Activity: Where an activity is located will also affect its capacity to serve particular areas, especially when the location of a comparable activity is considered. A library, for example, cannot reasonably be claimed to benefit an area that does not include the area in which it is located. When a facility is located near the boundary of a particular neighborhood, its service area would be expected to include portions of the adjacent neighborhood as well as the one in which it is located.

Accessibility: The accessibility of the activity also needs to be considered in defining the area served. For example, if a river or an interstate highway forms a geographic barrier that separates persons residing in an area in a way that precludes them from taking advantage of a facility that is otherwise nearby, that area should not be included in determining the area served. Other limits to accessibility may apply to particular activities. For example, the amount of fees to be charged, the time or duration that an activity would be available, access to transportation and parking, and the distance to be traveled can all constitute barriers to the ability of persons to benefit. Language barriers might also constitute an accessibility issue in a particular circumstance.

Comparable Activities: The nature, location, and accessibility of comparable facilities and services must also be considered in defining a service area. In most cases, the service area for one activity should not overlap with that of a comparable activity (e.g., two community centers, two clinics, or two neighborhood housing counseling services).

Use of CDBG Funds for Public Facilities

CDBG funds [cannot be utilized](#) to repair or maintain the City's public facilities, even in the public service category. CDBG public services are only eligible for a new service or a quantifiable increase in the level of service that which was has been provided by or in behalf of a local government.

[Public facility activities](#) (such as golf courses and swimming pools) which have a large service area often have difficulty meeting a national objective because the service area may, on the whole, contain less than 51 percent low income persons. Further, such activities are often considered a low priority in comparison to other pressing needs of communities, such as water, sewers, affordable and decent housing, and shelters for homeless persons.

COMMUNITY DEVELOPMENT DIVISION

FINAL Revenue FY 2016-2017

CDBG REVENUE

New Funding Sources - Eligible for use in Admin Cap

HUD CDBG Grant \$581,942 HUD Allocation Estimate

Reallocated Funding Sources - Not Eligible for use in Admin Cap

None to date...

Total Reallocated Funding: \$0

CDBG Revenue Total: \$581,942

20% CDBG Administration Cap: \$116,388 Budget 20% HUD Allocation Only

Public Service Cap Calculation

15% of Prior Year Program Income \$0

15% of New CDBG Allocation \$87,291

15% Public Services Cap: \$87,291

Housing Rehabilitation Revolving Loan Fund - Minimum Allocation Calculation

FY2015-2016 New CDBG Allocation \$562,741

Considered 'Prior Year' for FY16-17 Planning

1/12 of Prior Year's New CDBG Allocation Calculation \$46,895

Maximum Program Income Allowed

New Program Income on FY2014-2015 (last completed) CAPER: \$117,189

\$ Over Maximum to be Re-Allocated to Housing Rehab: \$70,294

HOME REVENUE

New Funding Sources - Eligible for use in Admin Cap

HUD HOME Grant \$294,209 HUD Allocation Estimate

10% Cap on HOME Administration: \$29,421

15% CHDO Allocation Minimum: \$44,131

Reallocated Funding Sources - Not Eligible for use in Admin Cap

Nada...yet

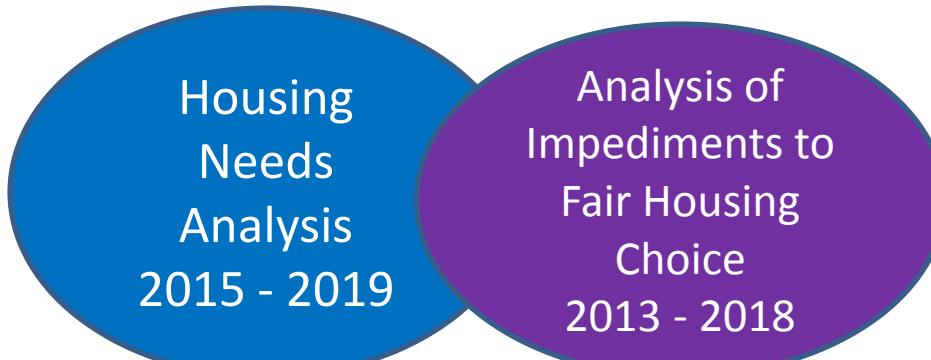
Total Reallocated Funding: \$0

HOME Revenue Total: \$294,209

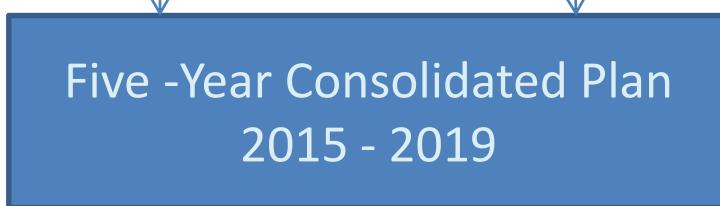
Total Available in CDBG & HOME: \$876,151

Consolidated Plan Review

FY2016-2017 Annual Action Plan



*Five – Year Data /
Studies*



Comprehensive Annual
Performance Evaluation Report



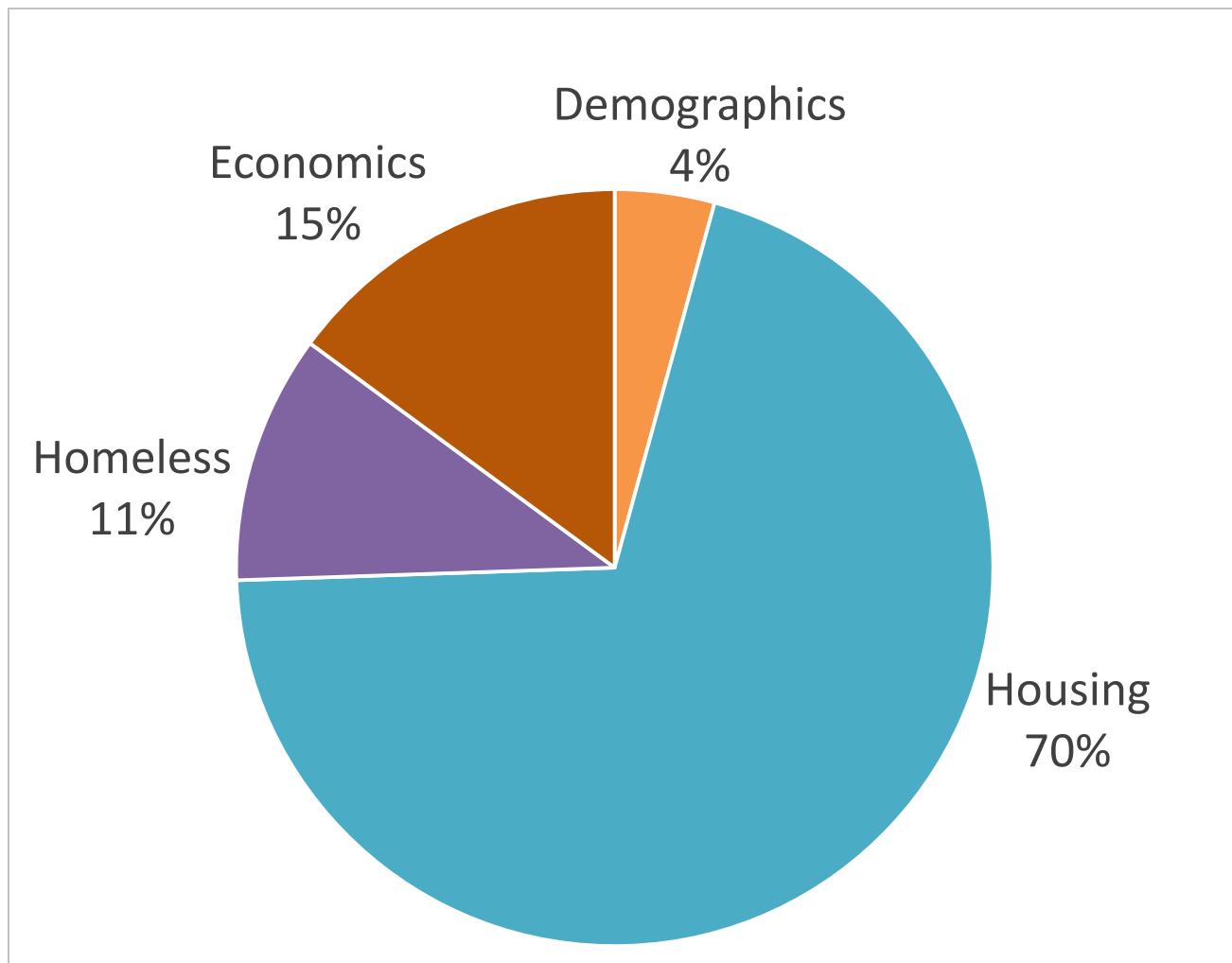
- Action Plan 2015-2016
- Action Plan 2016-2017
- Action Plan 2017-2018
- Action Plan 2018-2019
- Action Plan 2019-2020

Due May 15

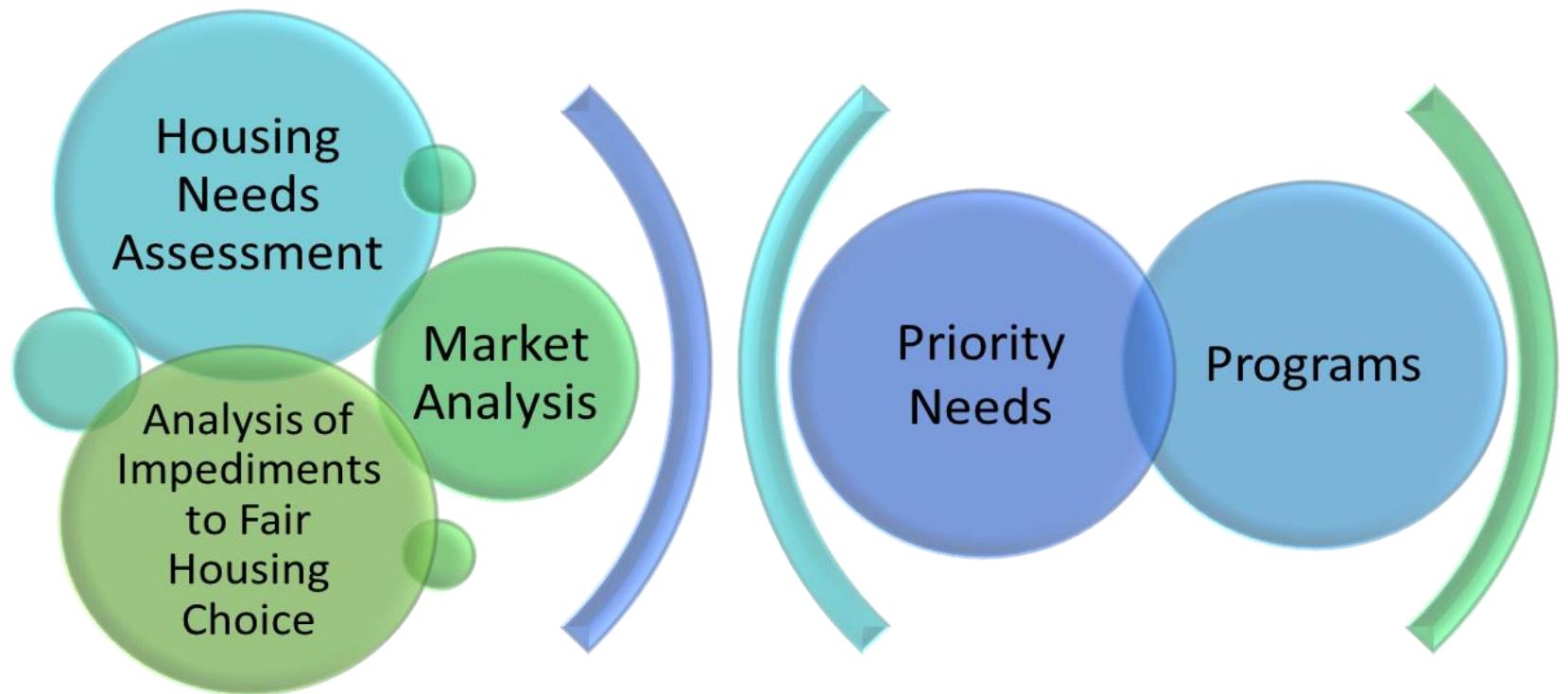
- CAPER 2015-2016
- CAPER 2016-2017
- CAPER 2017-2018
- CAPER 2018-2019
- CAPER 2019-2020

*Due
September 30*

HUD's Required Data in Consolidated Plan



Data Studies = Key Findings = Priority Needs = City Programs



Key Findings

- **Housing Cost Burden:** Most severe housing problem for residents is paying >30% income for housing expenses.
- **Smaller Housing Units:** 1,200 households on Housing Authority waiting list for one-bedroom units.
- **Tight Housing Market:** Low vacancy rates and over half of the voucher holders seeking housing have not been able to secure it due to high rent costs and poor unit conditions.

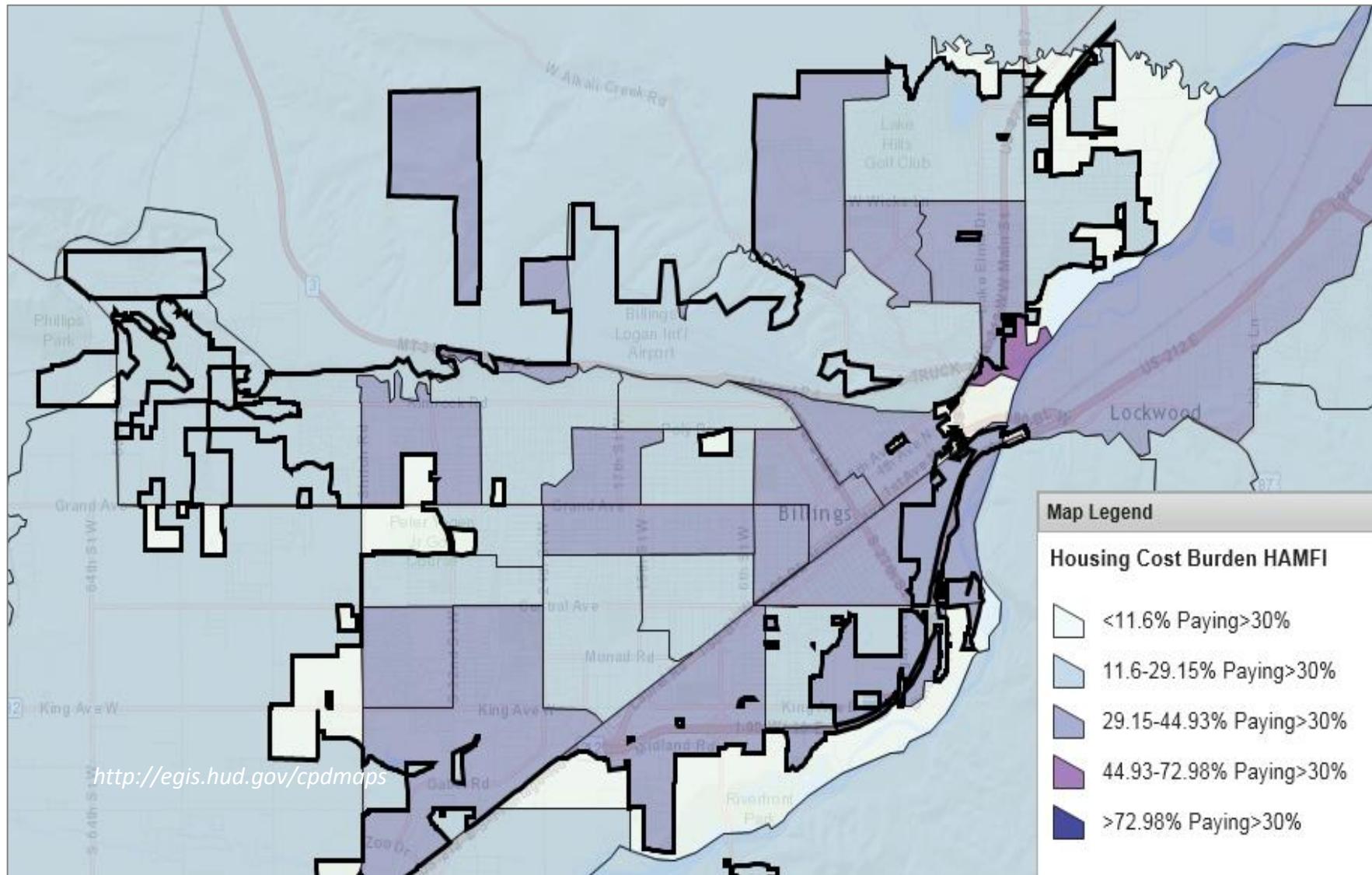
Key Findings

- **Minority Concentrations:** Beginnings of segregation and evidence of lending discrimination against Hispanic Americans. Most White households own their homes. Most minority households are renting.
- **Homelessness is on the rise:** An average of 711 individuals are experiencing homeless on any given day, including 122 families.
- **Special Needs Populations:** Elderly, Disabled, Public Housing Residents and HIV/AIDS populations are in need of various services and support.

Key Findings in Detail

Needs Assessment & Market Analysis

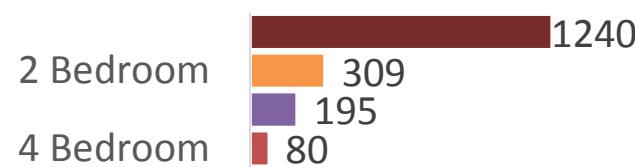
Housing Cost Burden



Small Housing Units / Tight Rental Market

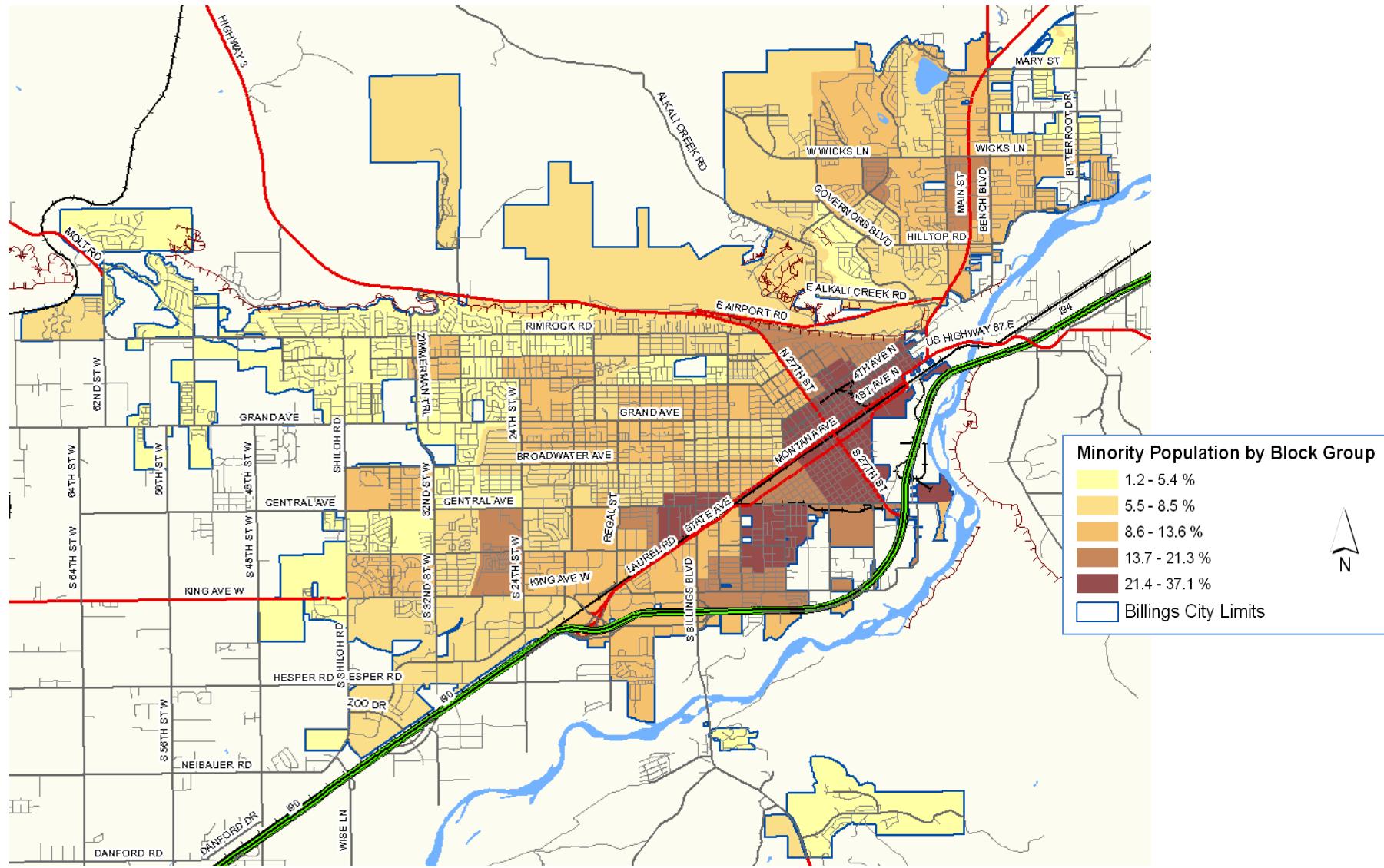
Housing Authority of Billings Assistance Programs	Vouchers / Units in Use	Waiting List
HAB Housing Choice Voucher / Section 8	551	2,076
Moderate Rehabilitation Section 8	38	187
Public Housing (Income Eligibility)	274	1,824
Section 8 Project-Based Vouchers	102	148
Department of Commerce Housing Choice Voucher	366	577
Veterans Affairs Supportive Housing Vouchers	76	77
Shelter Plus Care Vouchers	22	15
HOME Units	43	65
Tax Credit Units	32	22
Total:	1,504	4,991

Waiting List for Public Housing



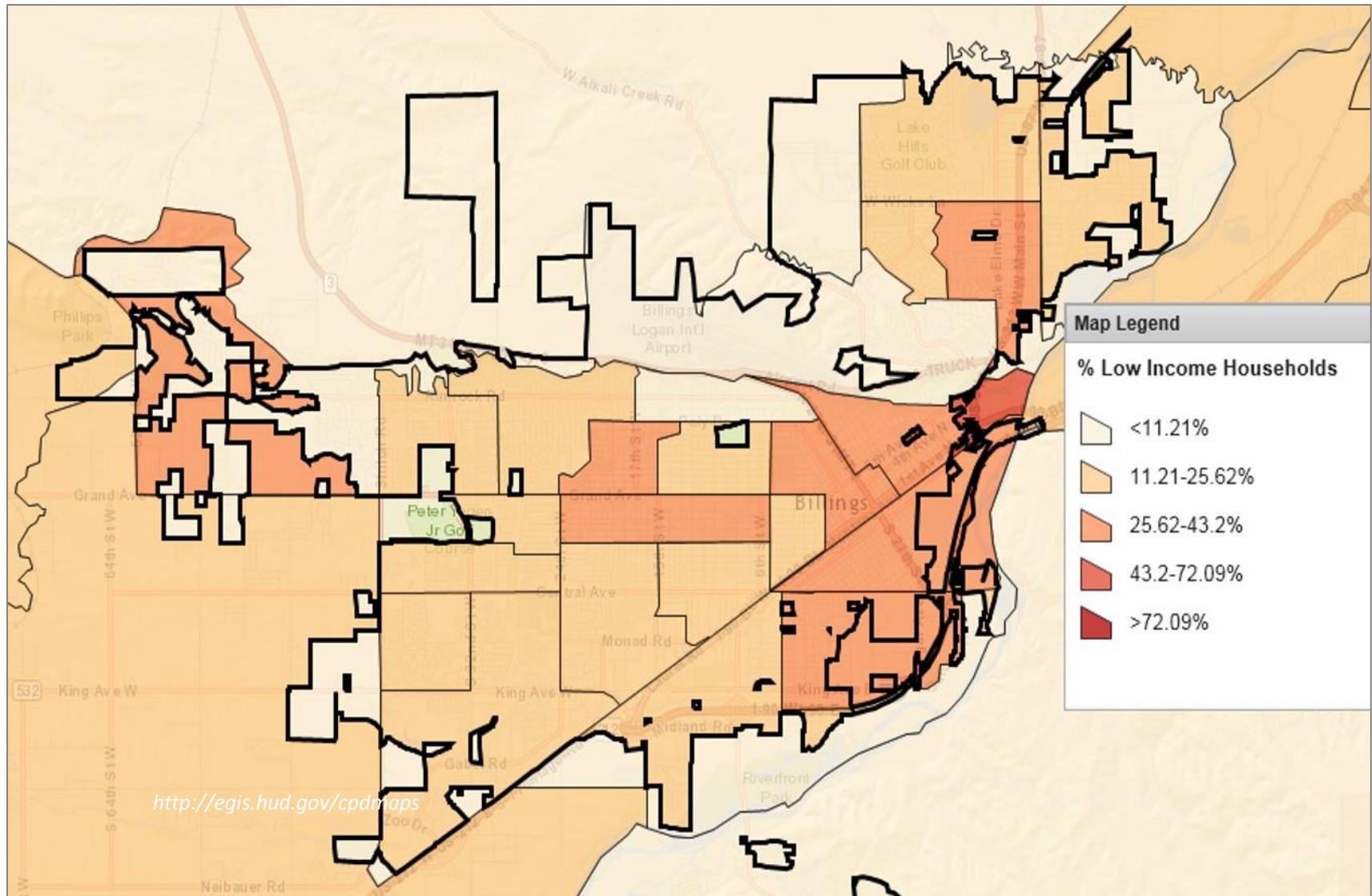
2% Vacancy Rate / Fully Booked

Minority Households

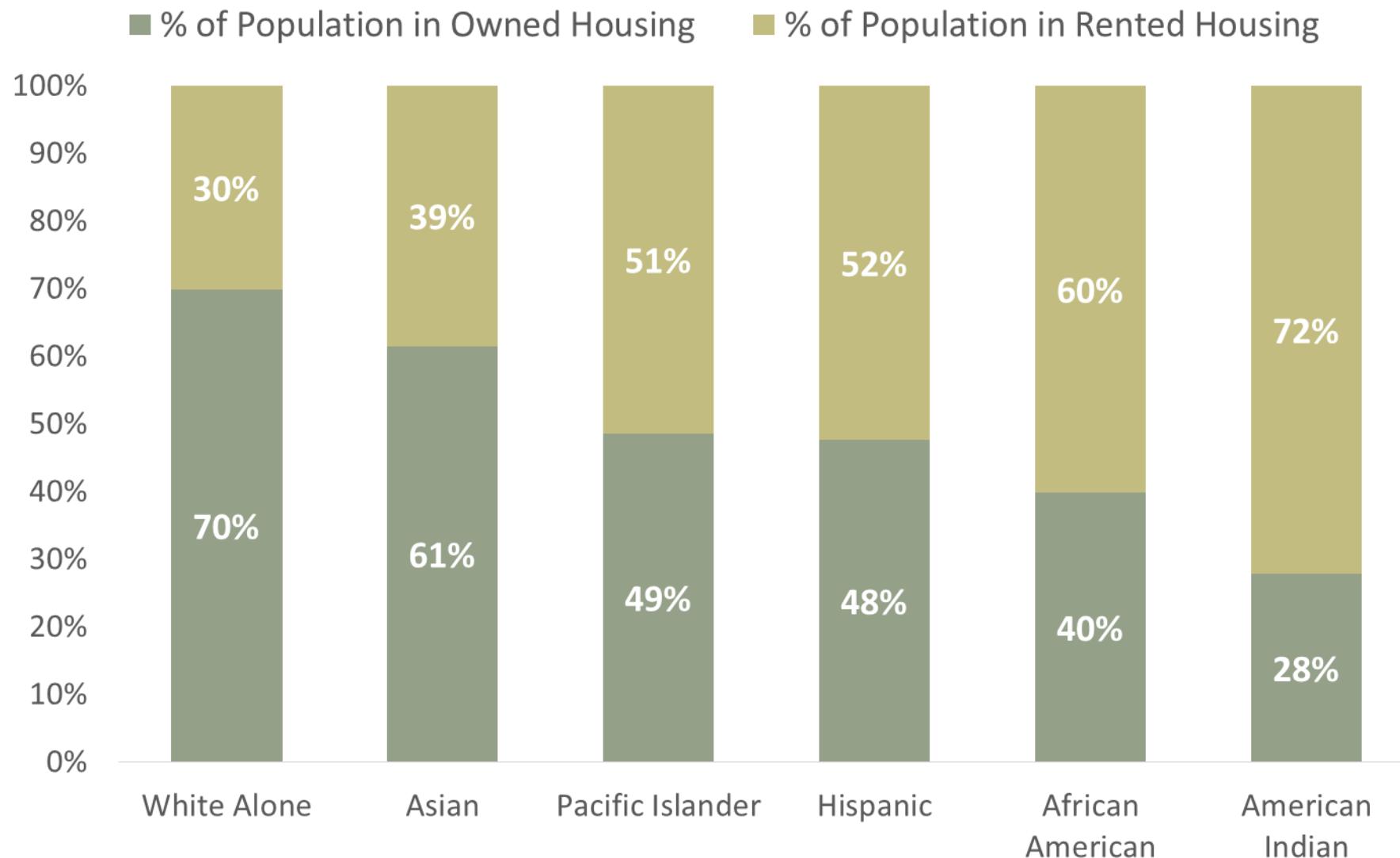


<div[](https://www2.census.gov/programs-surveys/cenus/2010/dec/subject-matter-articles/2010-census-minority-groups/2010-census-minority-groups.pdf)

Low Income Households



Owner / Renter Population by Race / Ethnicity



Homelessness & Special Needs

Cities receiving CDBG funds are required to provide a strategic plan which includes:

- A description of the City's strategy for **reducing and ending homelessness**.
- An **anti-poverty strategy** to **reduce the number of families in poverty**.

Welcome Home Billings
www.welcomehomebillings.org
City's ten-year plan to impact
homelessness

The AmeriCorps VISTA program provides full-time volunteers to support the efforts of **nonprofit organizations** and **public agencies** working to **fight poverty** in low-income communities.

Homelessness & Special Needs

Homeless: **THEN...**

- 600 individuals
- 80 families

Averaged 2005 to 2008

RECENT...

- **711** individuals
- **122** families

Averaged 2006 to 2014

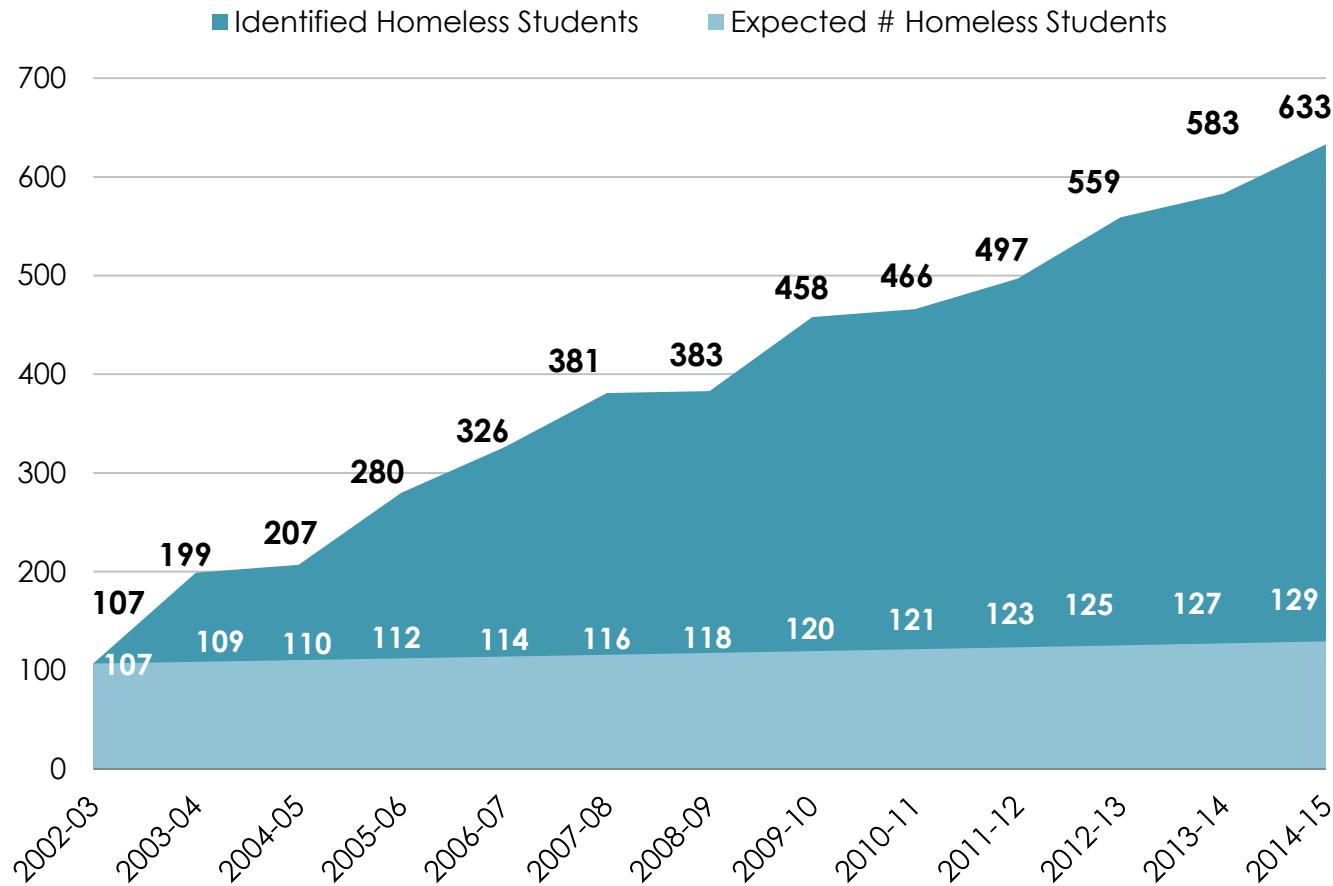
Special Needs: Elderly, Disabled, HIV/AIDS, Public Housing:

Housing, accessibility modifications, food security, financial literacy, employment, volunteer engagement, healthcare, transportation, childcare, etc.

Homelessness & Special Needs

Identified Homeless Students

Billings Public Schools



How does it all fit together?

Key Findings, Priority Needs, Goals &
Programs

Priority Needs & Goals

Housing Preservation

- Promote preservation of existing affordable housing supply, particularly in older neighborhoods.

New Housing Opportunity

- Promote new affordable housing opportunities.

Housing Choice

- Expand housing choice options for existing and potential new residents to foster stable, socio-economically diverse neighborhoods citywide.

Poverty Impact

- Support housing and community development specific to lower income and special needs households through poverty-impact initiatives.

Key Findings

Needs & Goals

Programs

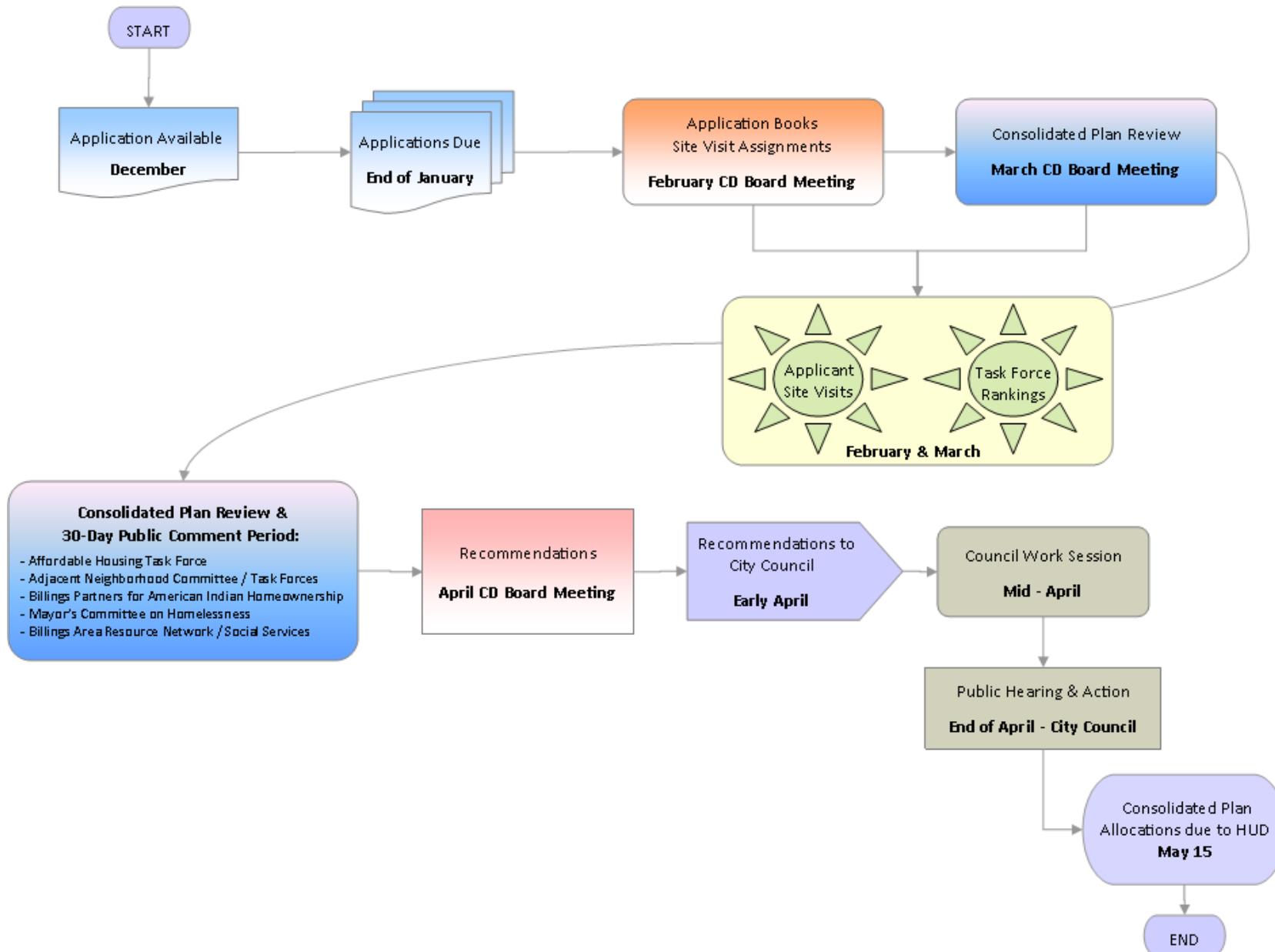


Questions?

CDBG & HOME Applications

Funding Allocation Process & Requirements

Budget Allocation Process



COMMUNITY DEVELOPMENT DIVISION

FINAL Revenue FY 2016-2017

CDBG REVENUE

New Funding Sources - Eligible for use in Admin Cap

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20% CDBG Administration Cap: \$116,388 Budget 20% HUD Allocation Only

Public Service Cap Calculation

15% of Prior Year Program Income \$0

15% of New CDBG Allocation \$87,291

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Housing Rehabilitation Revolving Loan Fund - Minimum Allocation Calculation

FY2015-2016 New CDBG Allocation \$562,741

Considered 'Prior Year' for FY16-17 Planning

1/12 of Prior Year's New CDBG Allocation Calculation

Program income over 1/12 of last year's new CDBG allocation allowed for reallocation if part of revolving loan fund.

Maximum Program Income Allowed

New Program Income on FY2014-2015 (last completed) CAPER: \$117,189

\$ Over Maximum to be Re-Allocated to Housing Rehab: \$70,294

HOME REVENUE

New Funding Sources - Eligible for use in Admin Cap

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15% CHDO Allocation Minimum: \$44,131

Reallocated Funding Sources - Not Eligible for use in Admin Cap

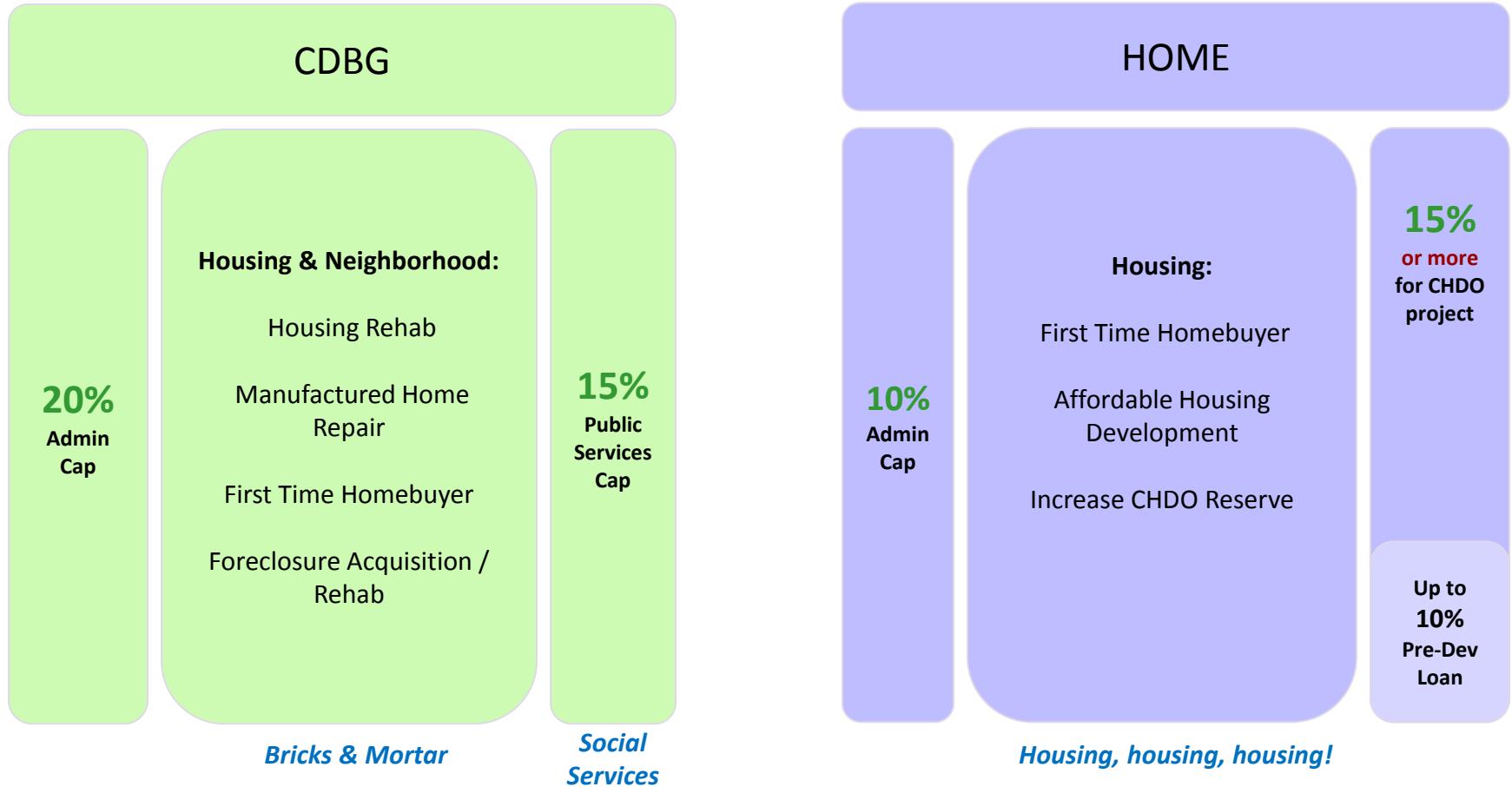
Nada...yet

Total Reallocated Funding: \$0

HOME Revenue Total: \$294,209

Total Available in CDBG & HOME: \$876,151

Minimum / Maximum Limits



CHDO: *Community Housing Development Organization* is a private, non-profit w/primary purpose to provide & develop decent, affordable housing for community it serves.

CONSOLIDATED AND ANNUAL ACTION PLAN GOALS

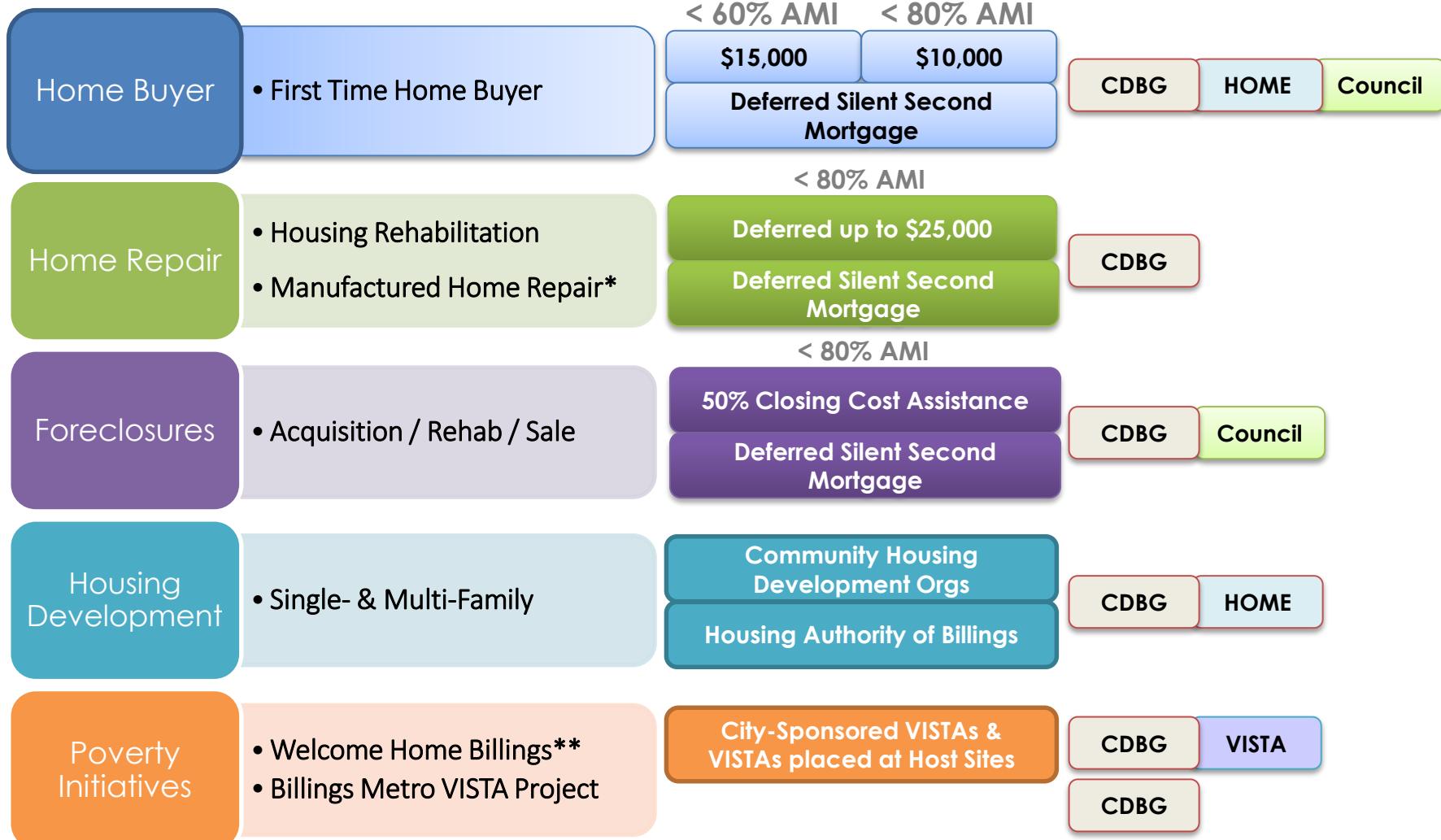
Strategy	Objective	Activity	Outcome Type	Five Year Goal	One Year Goal	HUD Objective	HUD Outcome	Funding Source*
A: Preserve existing affordable housing supply, particularly in older neighborhoods, to support the stability of the current affordable housing stock.	A1: Provide direct, affordable financing and assistance to low income homeowners for the completion of needed repairs citywide.	Housing Rehabilitation	Housing Units	50 / 25*	5	Suitable Living Environment	Affordability	CDBG
		Manufactured Home Repair		25 / 1	0			
	A2: Revitalize low income neighborhoods through foreclosure remediation, redevelopment and infill development.	Foreclosure Acquisition / Rehabilitation		5	1			CDBG NSP
		Affordable Housing Development		10 / 4	2			CDBG HOME
B: Create affordable housing opportunities to further improve access to and the quality of affordable housing stock.	B1: Provide affordable financing and support to promote homeownership opportunities citywide.	First Time Homebuyer	Housing Units	175	15	Decent Housing	Affordability	CDBG HOME
			Households	175	15			
	B3: Encourage the citywide development of new affordable single-family, multi-family and special needs housing in the community through private developers and nonprofit organizations.	Affordable Housing Development Program	Housing Units	See Above				
C: Expand housing choice options for existing and potential new residents to foster stable, socio-economically diverse neighborhoods citywide.	C1: Ensure equal opportunity and housing choice with all programs and activities citywide.	All Programs	-	-		Suitable Living Environment	Availability / Accessibility	Admin
		Billings Home Center	Clients	250	50			
	C2: Ensure core programs are implemented citywide to promote desegregation and inclusive neighborhoods.	All Programs	-	-				
D: Support housing and community development specific to lower income and special needs households through poverty-impact initiatives.	D1: Encourage collaboration to better address needs and to respond to opportunities for special needs populations.	Billings Metro VISTA Project	Clients	1,000	200	Suitable Living Environment	Affordability	CDBG CNCS
		Billings Home Center	Clients	See Above			Availability / Accessibility	Admin

*Community Development Block Grant (CDBG)
 CDBG or HOME Administration (Admin) Neighborhood Stabilization Program (NSP)
 AmeriCorps Volunteers in Service to America (VISTA) HOME Investment Partnerships Program (HOME)
 Corporation for National and Community Service (CNCS)

***Updated Five Year Goals**

Board & Council Approve Core Programs

Staff allocates on *close / shovel ready* basis



*Not recommended for funding allocation this year

**2016 sunset year

Recommendations

Administration: Maximum cap allowed

CDBG

- **Housing Rehabilitation:** \$175,000
- **Foreclosure:** \$200,000
- **VISTA:** \$50,000
- **Home Buyer:** Remaining CDBG

HOME

- **CHDO:** Minimum required is \$44,131
- **Home Buyer:** Remaining HOME

Recommendations

CDBG & HOME PROJECTS			Applications		Staff Recommendations Purple \$ set by Formulas	
			CDBG	HOME	CDBG	HOME
Admin / Planning	HN-1	CDBG Administration - CAP: 20% of new CDBG \$	\$125,000	-	\$116,388	-
	HN-2	HOME Administration - CAP: 15% of new HOME \$	-	\$30,000	-	\$29,421
Affordable Housing	HN-3	Set-Aside for CHDOs - Min: 15% of new HOME \$	-	\$40,000	-	\$44,131
	HN-4	Affordable Housing Development		\$0	-	\$0
	HN-5	First Time Home Buyer Program	\$0	\$200,000	\$40,554	\$220,657
	HN-6	Housing Rehabilitation Loan Program	\$175,000	-	\$175,000	-
	HN-7	Minor / Manufactured Home Repair	\$25,000	-	\$0	-
	HN-8	Foreclosure Acquisition Rehab	\$200,000	-	\$200,000	-
CDBG PUBLIC SERVICES			Applications		Staff Recommendations	
Public Services	PS-1	VISTA Administration	\$50,000	-	\$50,000	-
Total Funded:			\$575,000	\$270,000	\$581,942	\$294,209
			\$845,000		\$876,151	
			\$581,942	\$294,209	\$581,942	\$294,209
			\$6,942	\$24,209	\$0	\$0

CHDO Timeline & Recommendation

- **March 22:** CD Board Agenda sent via email
 - Staff Memo and Recommendation
- **April 5:** CD Board Presentation & Action
- **April 25:** City Council Action
 - Funding Allocation
 - Development Agreement

NeighborWorks Affordable Housing Project

CHDO Allocations	FY14-15	\$45,257
HOME Program Income or FY17-18 CHDO	FY15-16	\$39,553
	FY16-17	\$44,131
		\$46,059
		\$175,000

CHDO Recommendation

Required to commit 15% of all HOME funds to CHDOs...or give it back to HUD

Fiscal Year	Total Authorization	Admin Authorization	CR/CL/CC – Amount Committed to CHDOS	% CHDO Cmtd
2010	\$538,119	\$53,812	\$130,833	24.3%
2011	\$473,640	\$47,364	\$71,046	15.0%
2012	\$315,079	\$31,508	\$47,262	15.0%
2013	\$309,694	\$30,969	\$47,929	15.4%
2014	\$301,712	\$30,171	\$0	0.0%
2015	\$263,688	\$26,369	\$0	0.0%
Total	\$9,788,163	\$1,012,033	\$1,584,641	16.1%
<hr/>				
Fiscal Year	Total Authorization	Admin Authorization	CR/CL/CC – Amount Committed to CHDOS	% CHDO Cmtd
2010	\$538,119	\$53,812	\$130,833	24.3%
2011	\$473,640	\$47,364	\$71,046	15.0%
2012	\$315,079	\$31,508	\$47,262	15.0%
2013	\$309,694	\$30,969	\$47,929	15.4%
2014	\$301,712	\$30,171	\$45,257	15.0%
2015	\$263,688	\$26,369	\$39,553	15.0%
2016	\$294,209	\$29,421	\$44,131	15.0%
		Additional HOME Funds	\$46,059	
Total	\$10,082,372	\$1,041,454	\$1,759,641	17.5%

With a \$175,000 commitment:

- City will be in compliance with FY14-15 commitment deadline (*June 30, 2016*)
- Raise the City's contribution from **16.1%** to **17.5%**.

Questions?

CDBG & HOME ALLOCATIONS

CDBG & HOME PROJECTS			Applications		Staff Recommendations <i>Purple \$ set by Formulas</i>		CD Board Recommendations	
			CDBG	HOME	CDBG	HOME	CDBG	HOME
Admin / Planning	HN-1	CDBG Administration - CAP: 20% of new CDBG \$	\$125,000	-	\$116,388	-		-
	HN-2	HOME Administration - CAP: 15% of new HOME \$	-	\$30,000	-	\$29,421	-	-
Affordable Housing	HN-3	Set-Aside for CHDOs - Min: 15% of new HOME \$	-	\$40,000	-	\$44,131	-	-
	HN-4	Affordable Housing Development		\$0	-	\$0		
	HN-5	First Time Home Buyer Program	\$0	\$200,000	\$40,554	\$220,657		
	HN-6	Housing Rehabilitation Loan Program	\$175,000	-	\$175,000	-		-
	HN-7	Minor / Manufactured Home Repair	\$25,000	-	\$0	-		-
	HN-8	Foreclosure Acquisition Rehab	\$200,000	-	\$200,000	-		-
CDBG PUBLIC SERVICES			Applications		Staff Recommendations		CD Board Recommendations	
Public Services	PS-1	VISTA Administration	\$50,000	-	\$50,000	-		-
Total Funded:			\$575,000	\$270,000	\$581,942	\$294,209	\$0	\$0
			\$845,000		\$876,151		\$0	
			\$581,942	\$294,209	\$581,942	\$294,209	\$581,942	\$294,209
			\$6,942	\$24,209	\$0	\$0	\$581,942	\$294,209

NeighborWorks Affordable Housing Project

CHDO Allocations	FY14-15	\$45,257
	FY15-16	\$39,553
	FY16-17	\$44,131
HOME FY15-16 Program Income or FY17-18 CHDO	FY15-16 or FY16-17	\$46,059
		\$175,000