

CR-05 - Goals and Outcomes

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

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

The City of Eau Claire Program Year 2015 (PY15) Consolidated Annual Performance and Evaluation Report (CAPER) is the first year of the annual performance reports, which describes the actions and funding priorities used to carry out the PY 2015-2019 Consolidated Plan. This report describes progress made in the PY15 from August 1, 2015 to July 31, 2016, toward the goals set forth in the PY 2015-2019 Consolidated Plan. During PY15, the City of Eau Claire Housing Division expended \$1,129,587 in Community Development Block Grant and HOME Investment Partnership Grant funds on over 35 projects. Highlights of performance accomplishments according to specific need categories include:

Housing

- Assisted 1 homebuyer with direct homeownership assistance
- 12 new homeowners received rehabilitation loans to rehab their owner-occupied residential units, including the abatement of lead in 7 of those units.
- 15 low/mod homeowners received HOME Weatherization Grants (8 – Eau Claire Housing Division & 7 – Western Dairyland)
- 2 single family home were purchased and will be rehabilitated for the Homeownership Program.

Public Services

- 64 persons facing domestic violence sought shelter and support services,
- 159 families received case management assistance to help care for their children,
- 1100 persons sought emergency shelter as a result of homelessness,
- 625 received primary health care services from the Free Clinic,
- 624 persons received meals from the Community Table soup kitchen,
- 72 households received rental assistance with the Tenant Based Rental Assistance program,
- 624 Hmong households received tenant/landlord counseling and translation services,
- 68 Women and minorities received employment & business start-up services,

- 96 received Literary Assistance with the Chippewa Valley Literacy Association

Comparison of the proposed versus actual outcomes for each outcome measure submitted with the consolidated plan and explain, if applicable, why progress was not made toward meeting goals and objectives. 91.520(g)

Categories, priority levels, funding sources and amounts, outcomes/objectives, goal outcome indicators, units of measure, targets, actual outcomes/outputs, and percentage completed for each of the grantee’s program year goals.

Goal	Category	Source / Amount	Indicator	Unit of Measure	Expected – Strategic Plan	Actual – Strategic Plan	Percent Complete	Expected – Program Year	Actual – Program Year	Percent Complete
Assist micro-businesses	Non-Housing Community Development	CDBG: \$	Jobs created/retained	Jobs	23	0	0.00%			
Effective administration of programs	Administration	CDBG: \$ / HOME: \$	Other	Other	1	1	100.00%	1	1	100.00%
Improve community facilities serving LMI persons	Homeless Non-Homeless Special Needs Non-Housing Community Development	CDBG: \$	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	Persons Assisted	1	0	0.00%			
Improve existing owner-occupied housing units	Affordable Housing	CDBG: \$ / HOME: \$	Homeowner Housing Rehabilitated	Household Housing Unit	92	13	14.13%	36	12	33.33%

Improve existing owner-occupied housing units	Affordable Housing	CDBG: \$ / HOME: \$	Housing Code Enforcement/Foreclosed Property Care	Household Housing Unit	0	0		0	0	
Improve rental housing units for LMI households	Affordable Housing	CDBG: \$ / HOME: \$	Rental units rehabilitated	Household Housing Unit	14	0	0.00%	5	0	0.00%
Mitigate or prevent homelessness	Homeless	CDBG: \$	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	1013	0	0.00%			
Mitigate or prevent homelessness	Homeless	CDBG: \$	Homelessness Prevention	Persons Assisted	0	0		203	1100	541.87%
Provide opportunities for homeownership to LMI HH	Affordable Housing	CDBG: \$ / HOME: \$	Homeowner Housing Added	Household Housing Unit	32	0	0.00%			
Provide opportunities for homeownership to LMI HH	Affordable Housing	CDBG: \$ / HOME: \$	Direct Financial Assistance to Homebuyers	Households Assisted	10	0	0.00%	2	2	100.00%
Provide rent assistance to LMI HH	Affordable Housing Non-Homeless Special Needs	HOME: \$	Tenant-based rental assistance / Rapid Rehousing	Households Assisted	264	0	0.00%	50	72	144.00%

Provide services to assist LMI Persons	Non-Housing Community Development	CDBG: \$	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	887	906	102.14%	177	906	511.86%
Public improvements in LMI neighborhoods	Non-Housing Community Development	CDBG: \$	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	Persons Assisted	1	0	0.00%	12000	0	0.00%

Table 1 - Accomplishments – Program Year & Strategic Plan to Date

Assess how the jurisdiction’s use of funds, particularly CDBG, addresses the priorities and specific objectives identified in the plan, giving special attention to the highest priority activities identified.

During the 2015 grant year, CDBG funds were expended to high priority activities as identified in the action plan.

CR-10 - Racial and Ethnic composition of families assisted

Describe the families assisted (including the racial and ethnic status of families assisted).

91.520(a)

	CDBG	HOME
White	2,266	98
Black or African American	156	10
Asian	330	21
American Indian or American Native	460	0
Native Hawaiian or Other Pacific Islander	5	0
Total	3,217	129
Hispanic	184	0
Not Hispanic	3,033	129

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

Narrative

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CR-15 - Resources and Investments 91.520(a)

Identify the resources made available

Source of Funds	Source	Resources Made Available	Amount Expended During Program Year
CDBG		2,094,704	435,391
HOME		1,148,628	68,855

Table 3 - Resources Made Available

Narrative

During PY15, the City of Eau Claire Housing Division expended \$1,129, 587 in Community Development Block Grant and HOME Investment Partnership Grant funds on over 60 projects.

The City received \$523,676 in 2015 CDBG funds plus \$431,966 in CDBG program income for a total of \$955,642. The City received \$287,100 in HOME funds for the 2015 grant year.

Identify the geographic distribution and location of investments

Target Area	Planned Percentage of Allocation	Actual Percentage of Allocation	Narrative Description
Citywide	85		Citywide target area
LMI Census Tracts	15		Local target areas

Table 4 – Identify the geographic distribution and location of investments

Narrative

The chart attached below (2015 Geographic Information) indicates the projects in low-moderate income census tracts they were completed in during the 2015 grant year. All except for one project was located in an area designated as a low-moderate income area of the city.

Leveraging

Explain how federal funds leveraged additional resources (private, state and local funds), including a description of how matching requirements were satisfied, as well as how any publicly owned land or property located within the jurisdiction that were used to address the needs identified in the plan.

There were no projects associated with the City's use of entitlement funds that require or mandate leveraging public and private funds.

Fiscal Year Summary – HOME Match	
1. Excess match from prior Federal fiscal year	1,382,715
2. Match contributed during current Federal fiscal year	365,238
3. Total match available for current Federal fiscal year (Line 1 plus Line 2)	1,747,953
4. Match liability for current Federal fiscal year	62,828
5. Excess match carried over to next Federal fiscal year (Line 3 minus Line 4)	1,685,125

Table 5 – Fiscal Year Summary - HOME Match Report

Match Contribution for the Federal Fiscal Year								
Project No. or Other ID	Date of Contribution	Cash (non-Federal sources)	Foregone Taxes, Fees, Charges	Appraised Land/Real Property	Required Infrastructure	Site Preparation, Construction Materials, Donated labor	Bond Financing	Total Match
Western Dairyland	07/30/2016	365,238	0	0	0	0	0	365,238

Table 6 – Match Contribution for the Federal Fiscal Year

HOME MBE/WBE report

Program Income – Enter the program amounts for the reporting period				
Balance on hand at beginning of reporting period \$	Amount received during reporting period \$	Total amount expended during reporting period \$	Amount expended for TBRA \$	Balance on hand at end of reporting period \$
0	5,774	5,774	4,641	0

Table 7 – Program Income

Minority Business Enterprises and Women Business Enterprises – Indicate the number and dollar value of contracts for HOME projects completed during the reporting period						
	Total	Minority Business Enterprises				White Non-Hispanic
		Alaskan Native or American Indian	Asian or Pacific Islander	Black Non-Hispanic	Hispanic	
Contracts						
Dollar Amount	0	0	0	0	0	0
Number	0	0	0	0	0	0
Sub-Contracts						
Number	0	0	0	0	0	0
Dollar Amount	0	0	0	0	0	0
	Total	Women Business Enterprises	Male			
Contracts						
Dollar Amount	0	0	0			
Number	0	0	0			
Sub-Contracts						
Number	0	0	0			
Dollar Amount	0	0	0			

Table 8 – Minority Business and Women Business Enterprises

Minority Owners of Rental Property – Indicate the number of HOME assisted rental property owners and the total amount of HOME funds in these rental properties assisted						
	Total	Minority Property Owners				White Non-Hispanic
		Alaskan Native or American Indian	Asian or Pacific Islander	Black Non-Hispanic	Hispanic	
Number	0	0	0	0	0	0
Dollar Amount	0	0	0	0	0	0

Table 9 – Minority Owners of Rental Property

Relocation and Real Property Acquisition – Indicate the number of persons displaced, the cost of relocation payments, the number of parcels acquired, and the cost of acquisition						
Parcels Acquired		0		0		
Businesses Displaced		0		0		
Nonprofit Organizations Displaced		0		0		
Households Temporarily Relocated, not Displaced		0		0		
Households Displaced	Total	Minority Property Enterprises				White Non-Hispanic
		Alaskan Native or American Indian	Asian or Pacific Islander	Black Non-Hispanic	Hispanic	
Number	0	0	0	0	0	0
Cost	0	0	0	0	0	0

Table 10 – Relocation and Real Property Acquisition

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CR-20 - Affordable Housing 91.520(b)

Evaluation of the jurisdiction's progress in providing affordable housing, including the number and types of families served, the number of extremely low-income, low-income, moderate-income, and middle-income persons served.

	One-Year Goal	Actual
Number of Homeless households to be provided affordable housing units	250	0
Number of Non-Homeless households to be provided affordable housing units	245	72
Number of Special-Needs households to be provided affordable housing units	50	0
Total	545	72

Table 11 – Number of Households

	One-Year Goal	Actual
Number of households supported through Rental Assistance	25	72
Number of households supported through The Production of New Units	0	0
Number of households supported through Rehab of Existing Units	35	12
Number of households supported through Acquisition of Existing Units	0	2
Total	60	86

Table 12 – Number of Households Supported

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

In 2015, the City of Eau Claire Housing Division allocated funding to several different agencies that provide shelter to homeless families and individuals. Due to decreasing program funds, not all homeless were provided with affordable housing units.

Discuss how these outcomes will impact future annual action plans.

The City of Eau Claire Housing Division will take into consideration the decrease in funding and adjust the goals accordingly on future action plans.

Include the number of extremely low-income, low-income, and moderate-income persons served by each activity where information on income by family size is required to determine the eligibility of the activity.

Number of Persons Served	CDBG Actual	HOME Actual
Extremely Low-income	3	1
Low-income	7	2
Moderate-income	0	0
Total	10	3

Table 13 – Number of Persons Served

Narrative Information

During the 2015 grant year, the Housing Authority of the City of Eau Claire 72 households with the Tenant Based Rental Assistance (TBRA) program.

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CR-25 - Homeless and Other Special Needs 91.220(d, e); 91.320(d, e); 91.520(c)

Evaluate the jurisdiction's progress in meeting its specific objectives for reducing and ending homelessness through:

Reaching out to homeless persons (especially unsheltered persons) and assessing their individual needs

The Housing Authority of the City of Eau Claire continues to hold and attend the Continuum of Care planning sessions with several housing and social service agencies in the area to address homelessness in the Eau Claire area. The group meets monthly to share ideas, identify needs and set agendas to address housing and homeless in Eau Claire.

During the 2015 grant year, the Housing Authority received Supportive Housing Program (SHP) funding to provide first month rent and security deposit, housing counseling, bus/taxi tokens and household cleaning kits. The continuum of Care group continues to work on a City/County wide 10-year plan to end homelessness. Housing Director, Keith Johnathan is on the planning committee for this project.

Addressing the emergency shelter and transitional housing needs of homeless persons

The Housing Authority of the City of Eau Claire operates three units of transitional housing to shelter homeless families with children. During the 2015 reporting period, five (5) families were housed under these units. The family is able to live in the units for a period of anywhere between nine months and two years. After successfully completing the nine-month program, they have the option to move to public housing or receive a voucher if one is available. Residents are able to take advantage of the case management which is available through the Housing Authority.

Bolton Refuge House provided emergency shelter to survivors of domestic violence. In 2015, Bolton Refuge House operated a total of 9 transitional units where 25 women stayed in the transitional units. There still is frequently a waiting list for the Transitional Housing Project as families are waiting to leave the emergency shelter and/or for city or county assistance and affordable housing to become available.

Bolton Refuge House also received \$8,500 for help homeless, abused women and children to provide transitional and emergency shelter and case management.

Eau Claire Interfaith Hospitality Network provided emergency shelter and case management services to homeless families with children and homeless pregnant women. In the calendar year 2015, Interfaith provided emergency shelter services to 203 individuals including single pregnant women struggling with homelessness. Six months after leaving the shelter approximately 60% of the families maintained

permanent or transitional housing and 60% of the families were employed or had steady income through SSI. ECIHN has developed and maintained a comprehensive program to assist families with transition into the community.

Western Dairyland operates four transitional housing units that provide 31 to 60 days of shelter to families with children and pregnant females. In 2015, Western Dairyland's Homeless Haven program provided shelter to 123 individuals. Case management is provided to help transition the families into permanent housing. Families often receive a voucher or are placed public housing within the City of Eau Claire or Eau Claire County programs.

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

The City of Eau Claire Housing Division allocated funding to agencies that operate shelters for homeless individuals and families. The goals of these agencies is to work with the clients to establish sustainability, permanent housing and on-going case management to maintain housing.

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

The Housing Authority of the City of Eau Claire offers units to tenants that reach the end of their tenancy in their transitional housing units. They also offer a homeless preference to those on the Housing Authority waiting list.

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

Actions taken to address the needs of public housing

The Housing Authority of the City of Eau Claire currently operates 110 units of traditional Public Housing. These units consist of single-family homes and duplexes scattered throughout the community. The Authority strives to enhance the buildings and services to improve the physical and social environment at the public housing sites.

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

The City of Eau Claire Housing Division encourages Public Housing and Tenant Based Rental Assistance (TBRA) tenants to participate in the Homeownership program. Several tenants have transitioned from Public Housing to Homeownership over the years.

Below are some other resident initiatives implemented or sustained during the past program year were:

- Brochures and advertisements were distributed regarding the public housing and voucher program and qualifications to promote the programs.
- A newsletter was compiled and distributed to all Housing tenants regarding housing and other family and budgetary information.
- The Authority continues to have a housing resident appointed to the Housing Authority's board of commissioners.
- Provided self-help brochures to Housing tenants
- Purchased the books "*Haley's Green Hints*" and "*How to say NO and keep your friends*" for Public Housing tenants to fulfill the \$25/occupied units for tenant participation funding.

Actions taken to provide assistance to troubled PHAs

The Housing Authority of the City of Eau Claire is not designated as "troubled" by HUD and has been designated as a "High Performer" for approximately the last 20 years.

CR-35 - Other Actions 91.220(j)-(k); 91.320(i)-(j)

Actions taken to remove or ameliorate the negative effects of public policies that serve as barriers to affordable housing such as land use controls, tax policies affecting land, zoning ordinances, building codes, fees and charges, growth limitations, and policies affecting the return on residential investment. 91.220 (j); 91.320 (i)

The City of Eau Claire Housing Division has been successful in of updating the City's Fair Housing Code. The final version was taken the City Council and approved in August 2015.

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

The City of Eau Claire Housing Division/Housing Authority is an active participant in the monthly Continuum of Care (COC) meetings. The COC meetings include organizations such as Western Dairyland, Eau Claire Interfaith Hospitality Network, Inc., Bolton Refuge House, Community Table, Salvation Army, United Way, Eau Claire School District, Catholic Charities, Habitat for Humanity, Women's Way, the Aging and Disability Resource Center, Hope Gospel Mission, Positive Avenues, AIDS Resource Center of Wisconsin and the Housing Authority of the City of Eau Claire.

Western Dairyland conducted a Point in Time survey on July 30, 2016 ranking community needs. The final results of the survey were not available before the CAPER deadline. Once that information is received, strategies will be developed to address those needs that ranked as a high priority.

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

The City of Eau Claire Housing Authority has three trained employees that are state licensed as risk assessor/lead inspector/supervisor by the State of Wisconsin. Through the City/County Health Department there are three trained employees that are also state licensed. The City/County Health Department has purchased an XRF machine, which has been and will be shared with the City of Eau Claire Housing Authority. Over the last year, those inspectors received their refresher training to keep current with the LBP laws.

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

Employment training and related services were provided by Job Services of Wisconsin, Western

Wisconsin Private Industry Council, Eau Claire Hmong Mutual Assistance Association and other entities. Services ranged from specialized efforts to address specific needs to general education. Counseling and case management services were also included.

- **Housing Authority of the City of Eau Claire** provides a mechanism for breaking the poverty cycle through its affordable housing homeownership program for low-income persons.
- **Bolton Refuge House** – *Vocational Advocacy Program*. This project provides an employment advocacy component for victims of domestic abuse. CDBG funds a portion of the Volunteer Coordinator to recruit and train in the areas of transportation and job search. Information on current job openings, how to create cover letters and resumes and on-line access help is provided.
- **Eau Claire Interfaith Hospitality Network** provides emergency shelter to the homeless families. As a part of the program, the clients are provided with case management to help with finding a job and permanent housing.
- **Western Dairyland** – *Business Startup Program* received Community Development Block Grant (CDBG) Funding for a business start up program benefitting women/minorities that are low income in the city limits of Eau Claire. Western Dairyland provided the training and skills to be successful in the workforce for starting up their own business to be an entrepreneur.

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

The City's five year Consolidated Plan identified no major weaknesses in its institutional structure, although an area that could be improved was identified as better coordination and cooperation with both the public and private sectors. The City took three major steps in this area:

- **Redevelopment Authority.** In 1996, the City created the Redevelopment Authority that was organized under Wisconsin Statutes to undertake projects in redevelopment areas in the City. The Redevelopment Authority's seven member commission draws heavily on banking, real estate and business leaders who serve as commissioners to the Authority to plan and implement the redevelopment of properties and promote economic development.
- **Vision Committee.** The City of Eau Claire completed an 18-month process to update its citywide plan to guide community growth. The goals, policies, recommendations and maps contained in the plan will be used by the Plan Commission, City Council, and the private sector to make decisions about land use, economic development, provision of public services, streets, revitalization of neighborhoods, parks, landscaping, and other matters where local government may play a role in meeting the changing needs of the community.

A key part in the update process was the work of a Citizens Advocacy Vision Committee to identify major

community issues and establish directions for specific plan elements. The committee was composed of 35 citizens representing a broad spectrum of viewpoints. This broad participation by private citizens strengthens the institutional structure of the City by identifying core community values, strategic issues and potential strategic actions. Housing Director, Keith Johnathan, is a member of the committee.

City of Eau Claire Housing Division. The City of Eau Claire Housing Division through the Consolidated Plan planning process and operation of the Community Development Block Grant Program and its other housing programs has significantly increased its community contacts including contacts with over seventy religious organizations, governmental agencies, public services agencies, and private service providers in the Consolidated Plan development alone. It has also met with the Hmong Mutual Assistance Association, served on the board of the local Center for Independent Living, served on the board of a local lending institution's Community Reinvestment Act advisory committee, and met with the City/County Health Department. All of the above actions strengthen the City's ability to carry out its Consolidated Plan priorities.

The City of Eau Claire updates the Comprehensive Plan every 10 years and addressing affordable housing is part of that process. The Housing Authority of the City of Eau Claire is also a part of the updating process.

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

The City of Eau Claire used over \$200,000 of CDBG funding for rehabilitation and lead remediation for owner occupied and rental properties of low-income persons in the City of Eau Claire. Eau Claire has a well-maintained supply of large, older single-family houses that are amenable to rehabilitation. The rehabilitation and lead remediation activities are a high priority need for the City of Eau Claire. Due to new single-family development growing in the community it is creating opportunities for resale of older houses to moderate-income households. There is a good system of city and county government along with private social service and non-profit housing providers. These organizations can address many of the community's housing problems, which are not as unmanageable as those in some large community. Rehabilitation and lead remediation on future homeowners in those units as well.

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

The 2015 Action Plan stated that the City of Eau Claire may address, but not limited to, the following identified in the product:

1. Lack of Housing Units Accessible to Persons with Disabilities

Eau Claire has a large proportion of older housing which lacks accessibility. The City of Eau Claire will allocate 2015 CDBG funding to the City's rehabilitation loan program to provide no interest loans to homeowners in need of handicap accessibility. The Housing Authority has recently added units with handicapped accessible features to its Public Housing inventory and will continue to make modifications to existing units as necessary. The City of Eau Claire Housing Division also renovated one of their Homeownership properties, purchased with Neighborhood Stabilization Program (NSP) funds, into a handicapped accessible single family home.

2. Shortage of Affordable Housing Supply Relative to Resident Income. The Eau Claire Housing Authority indicates that longest public housing waiting list is for two-bedroom units and units with four or more bedrooms. The City of Eau Claire allocated HOME CHDO funds to the Eau Claire Home Mutual Assistance Association who purchased and rehabilitated two Affordable Housing duplexes with at least two bedrooms on each side during the 2012 and 2013 grant years. The City of Eau Claire Housing Division also allocated 2013 and 2015 funding to Western Dairyland for the future development of Affordable Housing units. side.

3. City of Eau Claire's Fair Housing Ordinance. The ordinance has been revised and was approved by the City of Eau Claire City Council in August 2015. The new ordinance adopts the states code as our policy, as amended, so any future changes to the states code will automatically be adopted as ours.

CR-40 - Monitoring 91.220 and 91.230

Describe the standards and procedures used to monitor activities carried out in furtherance of the plan and used to ensure long-term compliance with requirements of the programs involved, including minority business outreach and the comprehensive planning requirements

Each agency receiving funds through the CDBG and HOME Programs signed an agreement, which specifically describes the parameters and use of the funds they are receiving. Housing Division staff monitors each project for compliance with federal regulations, state and local codes, ordinances and any other applicable standards that may apply. Each monitoring visit is documented noting the date, location, attendees and highlights of the visit. Each project has a different use of CDBG and HOME funds and therefore has different reporting requirements. All subrecipients were required to submit reports with specific data and documentation as set forth in the agreement. During the 2015 grant year, the Housing Division performed one on-site monitoring visit with each subrecipient for the years covered in the agreement. The following items were reviewed to ensure each subrecipient was:

- Carrying out its funded activities as described in the signed agreement
- Carrying out its activities in a timely manner
- Charging costs to projects which are eligible and reasonable
- Conducting its activities with adequate control over financial performance
- Maintaining the required records to demonstrate compliance with applicable regulations and record keeping requirements. The City of Eau Claire Housing Division disburses CDBG funds on a reimbursement basis only, providing that appropriate and adequate documentation is provided to support the reimbursement request.

Inspections

All 2015 projects that are completed through the City of Eau Claire Housing Division's Rehabilitation Loan Program and the Down Payment Closing Cost Assistance Program must meet HUD's HQS and local codes. These items are completed as part of the rehabilitation work and final inspections are done upon completion of work.

Citizen Participation Plan 91.105(d); 91.115(d)

Describe the efforts to provide citizens with reasonable notice and an opportunity to comment on performance reports.

Public Notices announcing the Consolidated Annual Performance Evaluation Report (CAPER) public hearings and comment periods were published both in the local newspaper, the *Eau Claire Leader*

Telegram, and on the City of Eau Claire Community Development webpage. A notice was also sent to the local news media (WQOW & WEAU TV Stations and local radio stations), Government/Public Access Channel, the University of Wisconsin Eau Claire (UWEC), City of Eau Claire Library and the City of Eau Claire City Council members. In addition, the City sends direct email notices to the following organizations:

- Bolton Refuge House
- Chippewa Valley Free Clinic
- Children's Service Society
- Eau Claire Police Department
- Hmong Mutual Assistance Association
- The Community Table
- Feed My People
- Western Dairyland, Inc.
- City of Eau Claire Public Works
- City of Eau Claire Public Health Department

Citizens Participation

A Public Notice was published in the City of Eau Claire's Leader Telegram. A DRAFT copy of the CAPER was also posted in the City of Eau Claire's website and hard copies were available upon request. The public comment period ran from October 9, 2016 to October 31, 2016. A comment period of not less than 15 days was provided to receive comments prior to the submittal to the Department of Housing and Urban Development (HUD). PUBLIC NOTICEThe City of Eau Claire has prepared the 2015 Consolidated Annual Performance and Evaluation Report (CAPER) for the Community Development Block Grant program and the HOME Investment Partnership program for the period from August 1, 2015 to July 31, 2016. In order to qualify for federal funds, the City of Eau Claire must file these reports with the U.S. Department of Housing and Urban Development. A draft copy of the report is available at the City of Eau Claire Housing Division, 203 South Farwell Street, Eau Claire or at the City of Eau Claire's website www.ci.eau-claire.wi.us/housing-division/community-development-block-grant. Citizens are invited to submit comments to the City of Eau Claire Housing Division, City Hall, P.O. Box 1186, Eau Claire, WI 54702-1186, or call Jennifer Frueh at (715) 839-6108 prior to October 31, 2016, or attend Staff Public Hearings on Wednesday, October 12, 2016 at 1:30 p.m., Wednesday, October 19, 2016 at 10:00 a.m. or 3:00 p.m. in the Council Chamber of City Hall, 203 South Farwell Street, Eau Claire, Wisconsin. The hearing impaired may contact this office by voice TDD at (715) 839-4943. If there are other specialized needs due to handicap, i.e. sign language interpreter, wheelchair accessibility, reader, please contact this office. Housing Division City of Eau Claire Provide a summary of citizen comments. Despite efforts to publicize the public hearings/comment period, no citizen comments were received.

CR-45 - CDBG 91.520(c)

Specify the nature of, and reasons for, any changes in the jurisdiction’s program objectives and indications of how the jurisdiction would change its programs as a result of its experiences.

The City of Eau Claire did not make any changes in the program objectives during the 2015 grant year and would not change any programs at this time. CDBG funding was allocated to the same public services as funded in previous years and they still prove to be valuable non-profits for the City.

Does this Jurisdiction have any open Brownfields Economic Development Initiative (BEDI) grants?	No
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[BEDI grantees] Describe accomplishments and program outcomes during the last year.

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CR-50 - HOME 91.520(d)

Include the results of on-site inspections of affordable rental housing assisted under the program to determine compliance with housing codes and other applicable regulations

Please list those projects that should have been inspected on-site this program year based upon the schedule in §92.504(d). Indicate which of these were inspected and a summary of issues that were detected during the inspection. For those that were not inspected, please indicate the reason and how you will remedy the situation.

Please list those projects that should have been inspected on-site this program year based upon the schedule in §92.504(d). Indicate which of these were inspected and a summary of issues that were detected during the inspection. For those that were not inspected, please indicate the reason and how you will remedy the situation.

During the 2015 grant period, inspections were completed on the Housing Authority of the City of Eau Claire's three transitional units as well as Bolton Refuge House, Western Dairyland and Hmong Association's transitional units. The units were inspected for compliance of U.S. Department of Housing and Urban Development Housing Quality Standards (HQS). All units were in compliance.

Provide an assessment of the jurisdiction's affirmative marketing actions for HOME units. 92.351(b)

Marketing of the HOME Program included publication of program availability using the equal opportunity in housing logo has been conducted in a manner, which has promoted the programs to minorities and women. The Rehabilitation/Weatherization Program has committed funds to 55% to female head of household.

HOME Program agreements with the CHDO organizations include language regarding the need to affirmatively market HOME improved units. Construction/Rehabilitation of units took place during the reporting period by the CHDOs, specifically Eau Claire Interfaith Hospitality Network and Bolton Refuge House Marketing of the units after completion will be conducted in an affirmative manner.

Affirmative marketing methods have been successful in the early stages of the HOME Program implementation. It is expected that such results will continue.

Refer to IDIS reports to describe the amount and use of program income for projects, including the number of projects and owner and tenant characteristics

In 2015, the City of Eau Claire Housing Division received \$6,141 in program income for the HOME program as a result of early payments from the weatherization program and payback from the Tenant

Describe other actions taken to foster and maintain affordable housing. 91.220(k) (STATES ONLY: Including the coordination of LIHTC with the development of affordable housing). 91.320(j)

In 2015, the City continued to support the Housing Authority of the City of Eau Claire, which has primary responsibility for the strategy and continued to implement most of the programs. The Housing Authority of the City of Eau Claire continued to operate the City's Housing Rehabilitation Loan Program, updated its existing housing programs.

The City of Eau Claire purchased one single-family home in 2015 to use as a homeownership property using federal CDBG funds. The Housing Authority/Housing Division also purchased three (3) units using Neighborhood Stabilization Program (NSP) funding for a second homeowner program using the guidelines. LMI families will be given the option to purchase the home through direct sale or rent the home for a three-year period where one-fourth of the rent they pay goes towards reducing the purchase price. After the three years is up the LMI family will obtain bank financing to purchase the home. The potential home buyers can also qualify for up to two \$15,000 subsidies, which will reduce the price of the home making it more affordable. Program Participants may purchase a home out right, providing they have sufficient funds for down payment and good credit.

CR-60 - ESG 91.520(g) (ESG Recipients only)

ESG Supplement to the CAPER in *e-snaps*

For Paperwork Reduction Act

1. Recipient Information—All Recipients Complete

Basic Grant Information

Recipient Name	EAU CLAIRE
Organizational DUNS Number	020495156
EIN/TIN Number	396005436
Identify the Field Office	MILWAUKEE
Identify CoC(s) in which the recipient or subrecipient(s) will provide ESG assistance	

ESG Contact Name

Prefix
First Name
Middle Name
Last Name
Suffix
Title

ESG Contact Address

Street Address 1
Street Address 2
City
State
ZIP Code
Phone Number
Extension
Fax Number
Email Address

ESG Secondary Contact

Prefix
First Name
Last Name
Suffix
Title
Phone Number
Extension
Email Address

2. Reporting Period—All Recipients Complete

Program Year Start Date 08/01/2015

CAPER

25

Program Year End Date

07/31/2016

3a. Subrecipient Form – Complete one form for each subrecipient

Subrecipient or Contractor Name

City

State

Zip Code

DUNS Number

Is subrecipient a victim services provider

Subrecipient Organization Type

ESG Subgrant or Contract Award Amount

DRAFT

CR-65 - Persons Assisted

4. Persons Served

4a. Complete for Homelessness Prevention Activities

Number of Persons in Households	Total
Adults	
Children	
Don't Know/Refused/Other	
Missing Information	
Total	

Table 14 – Household Information for Homeless Prevention Activities

4b. Complete for Rapid Re-Housing Activities

Number of Persons in Households	Total
Adults	
Children	
Don't Know/Refused/Other	
Missing Information	
Total	

Table 15 – Household Information for Rapid Re-Housing Activities

4c. Complete for Shelter

Number of Persons in Households	Total
Adults	
Children	
Don't Know/Refused/Other	
Missing Information	
Total	

Table 16 – Shelter Information

4d. Street Outreach

Number of Persons in Households	Total
Adults	
Children	
Don't Know/Refused/Other	
Missing Information	
Total	

Table 17 – Household Information for Street Outreach

4e. Totals for all Persons Served with ESG

Number of Persons in Households	Total
Adults	
Children	
Don't Know/Refused/Other	
Missing Information	
Total	

Table 18 – Household Information for Persons Served with ESG

5. Gender—Complete for All Activities

	Total
Male	
Female	
Transgender	
Don't Know/Refused/Other	
Missing Information	
Total	

Table 19 – Gender Information

6. Age—Complete for All Activities

	Total
Under 18	
18-24	
25 and over	
Don't Know/Refused/Other	
Missing Information	
Total	

Table 20 – Age Information

7. Special Populations Served—Complete for All Activities

Number of Persons in Households

Subpopulation	Total	Total Persons Served – Prevention	Total Persons Served – RRH	Total Persons Served in Emergency Shelters
Veterans				
Victims of Domestic Violence				
Elderly				
HIV/AIDS				
Chronically Homeless				
Persons with Disabilities:				
Severely Mentally Ill				
Chronic Substance Abuse				
Other Disability				
Total (unduplicated if possible)				

Table 21 – Special Population Served

CR-70 – ESG 91.520(g) - Assistance Provided and Outcomes

10. Shelter Utilization

Number of New Units – Rehabbed	
Number of New Units – Conversion	
Total Number of bed - nighths available	
Total Number of bed - nights provided	
Capacity Utilization	

Table 22 – Shelter Capacity

11. Project Outcomes Data measured under the performance standards developed in consultation with the CoC(s)

DRAFT

CR-75 – Expenditures

11. Expenditures

11a. ESG Expenditures for Homelessness Prevention

	Dollar Amount of Expenditures in Program Year		
	2013	2014	2015
Expenditures for Rental Assistance			
Expenditures for Housing Relocation and Stabilization Services - Financial Assistance			
Expenditures for Housing Relocation & Stabilization Services - Services			
Expenditures for Homeless Prevention under Emergency Shelter Grants Program			
Subtotal Homelessness Prevention			

Table 23 – ESG Expenditures for Homelessness Prevention

11b. ESG Expenditures for Rapid Re-Housing

	Dollar Amount of Expenditures in Program Year		
	2013	2014	2015
Expenditures for Rental Assistance			
Expenditures for Housing Relocation and Stabilization Services - Financial Assistance			
Expenditures for Housing Relocation & Stabilization Services - Services			
Expenditures for Homeless Assistance under Emergency Shelter Grants Program			
Subtotal Rapid Re-Housing			

Table 24 – ESG Expenditures for Rapid Re-Housing

11c. ESG Expenditures for Emergency Shelter

	Dollar Amount of Expenditures in Program Year		
	2013	2014	2015
Essential Services			
Operations			
Renovation			
Major Rehab			
Conversion			
Subtotal			

Table 25 – ESG Expenditures for Emergency Shelter

11d. Other Grant Expenditures

	Dollar Amount of Expenditures in Program Year		
	2013	2014	2015
Street Outreach			
HMIS			
Administration			

Table 26 - Other Grant Expenditures

11e. Total ESG Grant Funds

Total ESG Funds Expended	2013	2014	2015

Table 27 - Total ESG Funds Expended

11f. Match Source

	2013	2014	2015
Other Non-ESG HUD Funds			
Other Federal Funds			
State Government			
Local Government			
Private Funds			
Other			
Fees			
Program Income			
Total Match Amount			

Table 28 - Other Funds Expended on Eligible ESG Activities

11g. Total

Total Amount of Funds Expended on ESG Activities	2013	2014	2015

Table 29 - Total Amount of Funds Expended on ESG Activities

Attachment

Citizen's Participation Plan

I. INTRODUCTION

The City of Eau Claire Housing Division is in charge of implementing citizen participation requirements as outlined in 24 CFR 570.431 (b) and (c). The City of Eau Claire is committed to follow detailed, written policies and procedures for public involvement in the development of the Consolidated Plan and the use of Community Development Block Grant (CDBG) and HOME Investment Partnership funds.

As a requirement of the U.S. Department of Housing & Urban Development's CDBG/HOME Program, this Citizen Participation Plan was developed to provide citizens with information and knowledge of opportunities to become involved with and comment upon the City of Eau Claire's CDBG/HOME program.

II. PUBLIC HEARINGS

Public hearings will be held each year to provide opportunities for public participation at various states of the CDBG/HOME program year.

- (1) The **Annual Action Plan** Hearing, held in May, corresponds with draft publication of the CDBG/HOME Action Plan, which outlines the proposed activities for the subsequent program year, which begins August 1. Citizens are asked to view the draft plan on-line or at City Hall prior to providing comments at the hearing.
- (2) The **Consolidated Annual Performance & Evaluation Report (CAPER)** Hearing, held in October, corresponds with the draft publication of the CDBG/HOME CAPER, which summarizes the activities undertaken during the previous program year. Citizens are asked to view the CAPER on-line or at City Hall prior to providing comments at the Public Hearing.

III. PUBLIC COMMENT PERIODS

Two public comment periods, which last 30 days, are held each year to seek public input, including:

- (1) The **Annual Action Plan comment Period (June)**. This period marks completion of the Annual Action Plan DRAFT. Citizens are encouraged to review the Annual Action Plan and provide comments, which will be included in the final submission.
- (2) The **Consolidated Annual Performance & Evaluation Report (CAPER) Comment Period (October)**. This period marks completion of the Consolidated Annual Performance and

Evaluation Report (CAPER) DRAFT. Citizens are encouraged to review the CAPER and provide comments, which will be included in the final submission.

DRAFT

IV. CONSOLIDATED PLAN PUBLIC HEARING/COMMENT PERIOD

Both a formal public hearing and 30-45 day public comment period will occur as part of the development of each Five Year Consolidated Plan for CDBG/HOME funding.

V. AS-NEEDED PUBLIC HEARINGS/COMMENT PERIODS

Special public hearings/comment periods will be administered when substantial amendments to CDBG/HOME-related activities are proposed/requested. Substantial amendments may include, but are not limited to, those involving:

- 1) A dollar amount greater than 25 percent of the original subrecipient award
- 2) Any new activity or change in use of funding from one activity to another
- 3) Occurrence of a natural disaster where “urgent need” funding might apply
- 4) Announcement of new/additional grant funding sources available
- 5) Other unforeseen circumstances relating to CDBG activity

VI. PUBLICIZING OPPORTUNITIES FOR CITIZEN PARTICIPATION

Notices announcing public hearings and comment periods are published on the City of Eau Claire CDBG/HOME web site, in the local newspaper – *The Leader Telegram*, faxed to local media and posted at City Hall. Printed copies of the Annual Action Plan and CAPER will be available to the public at the City of Eau Claire Housing Division (203 S Farwell Street, Eau Claire, Wisconsin 54701) and on the City of Eau Claire web page at www.ci.eau-claire.wi.us/housing-division/community-development-block-grant.

VII. ACCESSIBILITY

All City of Eau Claire residents, namely persons of low-moderate income, persons with disabilities, persons with limited English-speaking ability and persons of racial minority, are encouraged to contribute input regarding CDBG/HOME funded activities. No person shall be excluded from participation in the City of Eau Claire CDBG/HOME programs on the grounds of race, color, national origin, gender, sexual orientation, age, religious creed or disability. To encourage equal access in participation for persons with disabilities, all CDBG/HOME –related hearings and meetings are held at the City of Eau Claire which is completely handicapped accessible. With advanced notice, the City of Eau Claire will also provide interpreters for speaking and hearing impaired persons.

VIII. OBJECTIONS TO CDBG/HOME DOCUMENTS

Citizens may provide comments regarding City of Eau Claire’s Annual Action Plan, CAPER, Five-Year Consolidated Plan, proposed Substantial Amendment, or any other CDBG/HOME-related matter at any time. Comments must include identification of unmet requirements and relevant supporting data and will be considered on the following grounds:

- 1) Stated needs and objectives are inconsistent with available and reliable data
- 2) Stated projects are inappropriate for meeting needs and approved objectives
- 3) Consolidated plan elements do not comply with federal regulations for the CDBG/HOME Program

Comments must be submitted in written form to: **City of Eau Claire Housing Division, 203 S Farwell Street, Eau Claire, WI 54701.** (Office hours are 8:00 a.m. to 5:00 p.m. Monday through Friday) Upon receipt, the Housing Division will present the written comments to the Administrator of the CDBG/HOME Program. All written comments shall receive a written response within 15 days after the Administrator has reviewed the matter.

IX. TECHNICAL ASSISTANCE

Three Technical Assistance Workshops will be provided to organizations that serve low-and moderate-income persons in developing their CDBG/HOME subrecipient applications. In addition, the Housing Division shall provide interested parties with access to CDBG/HOME records upon request. All citizens are and/or local agency representatives are encouraged to contact City CDBG/HOME staff with questions about both program guidelines inquiries and general community development needs in the City of Eau Claire.

X. ANTI-DISPLACEMENT

Due to the potential liability for long-term assistance and burdens placed on affected tenants, the City of Eau Claire will generally avoid funding CDBG/HOME Projects that involve permanent residential or business displacement. In cases where displacement is absolutely necessary, relocation benefits will be paid in accordance with the Uniform Relocation Act, other applicable federal regulations, and Chapter 32 of the Wisconsin State Statutes.

Equal Opportunity & Affirmative Action

Equal Opportunity and Affirmative Action

Policy Statement

July 28, 2010

CITY OF EAU CLAIRE
L.E. PHILLIPS MEMORIAL PUBLIC LIBRARY
EAU CLAIRE CITY/COUNTY HEALTH DEPARTMENT
HOUSING AUTHORITY OF THE CITY OF EAU CLAIRE

Adopted: 1973
Affirmative Action Committee Structure Change: 1983
Policy Revised: 1989
Policy Revised: 1999
Policy Revised: 2010

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EQUAL OPPORTUNITY/AFFIRMATIVE ACTION POLICY STATEMENT

OVERVIEW

We, the agencies listed below, are committed to providing equal employment opportunities, affirmative action programs and an equitable service delivery system. We strictly prohibit any form of unlawful discrimination in all personnel, employment and service delivery matters. We intend this document to be easily understood and applied. The terms that we use shall be given their ordinary meanings. However, if a legal definition exists for any term, the then most recent legal definition shall substitute for our term. We will comply with all applicable equal opportunity/affirmative action laws. We believe that this is good government and good economics. In the event that a deficiency is found in our organizations, we will establish goals to correct the deficiency. Our policies, procedures and management practices reflect this commitment.

Statement of Principles

We are committed to and will affirmatively implement the following principles:

1. We will provide equal opportunity in all personnel actions, including, but not limited to, recruiting, hiring, apprenticeships, training, transfers, promotions, disciplinary actions, fringe benefits, compensation, terms of employment, working conditions, and terminations without unlawfully considering one's age, race, creed, color, religion, physical or mental impairment, marital status, military service, gender, pregnancy, ancestry, use or non-use of lawful products off of our premises during non-working hours, national origin, sexual orientation, arrest record or conviction record.
2. If appropriate, specific affirmative steps will be taken to address unlawful discrimination. We will conduct an analysis of our workforce and use our analysis as a foundation for developing affirmative action efforts and recruiting goals.
3. Our affirmative action efforts will include reviewing and analyzing personnel policies, procedures and practices to determine if they are necessary, job-related and lawful.
4. We are committed to providing an equitable service delivery system. Services shall be provided without unlawfully discriminating against clients/recipients. We require our agencies, vendors, contractors, sub-contractors, and companies to share our commitment to affirmative action and equal opportunity. Employees, agents, vendors, contractors, companies, and client/service recipients shall notify us of any actual or suspected discrimination or unlawful harassment.

5. We are committed to developing and maintaining an environment free of sexual harassment.
6. We will maintain an Equal Opportunity/Affirmative Action (EO/AA) Citizen's Advisory Committee.
7. We will promptly investigate allegations of unlawful discrimination and unlawful harassment. We shall retain records of our investigations. When practicable, we will seek to maintain the confidentiality of the investigation.

Investigating Complaints

Filing Complaints

All individuals with information concerning a possible violation of this Policy Statement, including Complainants, shall file a written complaint with the AA/EO Officer, Director of Human Resources or Agency Director within 30 days of the alleged violation. At their discretion, the AA/EO Officer, Director of Human Resources or Agency Director may extend the 30 day period if the Complainant so requests.

AA/EO complaints shall provide specific details of the alleged violation and offer a recommended solution. The AA/EO Officer, Director of Human Resources or the Agency Director (or designee) shall promptly initiate an investigation of all AA/EO complaints. Investigations will be commenced within 10 business days unless extenuating circumstances exist. Investigators shall consider privacy concerns when conducting investigations. Investigators will ordinarily question individuals having knowledge of either the specific allegation or similar matters. Investigators should promptly conduct, complete the investigation and document their findings and recommendations.

After completing the investigation, the Officer/Director shall promptly notify the Complainant in writing of the investigator's findings and recommendations. The findings and recommendations will ordinarily be provided within 10 business days unless extenuating circumstances exist.

Retaliation Prohibited

We will not retaliate against any individual for opposing practices that violate this Policy Statement or for filing a complaint, testifying or participating in any way in an investigation, proceeding or litigation. If an employee or client/service recipient believes that he or she is being retaliated against, that employee/client/service recipient shall follow the complaint and appeal process detailed above.

Review and Record-keeping

Each year the AA/EO Officer will consider the effectiveness of this Policy Statement and evaluate the need for change. The AA/EO Officer will evaluate whether changes will promote nondiscrimination in employment/delivery of services. The AA/EO Officer shall maintain, for three years, records showing complaints filed, reviews conducted, investigations, decisions reached, corrective actions taken and the reason(s) for the decision. Annually, the AA/EO Officer will provide a summary report of all complaints filed under this policy to the Affirmative Action Committee. The Affirmative Action Officer will encourage our employees to incorporate the standards of this plan in their daily work practices.

Employment Relationship

Nothing contained in this Policy Statement is to be construed by any employee as establishing, creating or constituting a written, oral or implied contract of employment. Furthermore, nothing herein shall be construed as a guarantee of continued employment nor as a guarantee of any benefits or conditions of employment.

The provisions set forth in this Policy Statement supersede prior personnel policies and procedures, whether written or established by past practice. Because this Policy Statement is based on operational policies and procedures, federal and state mandated policies and procedures, and present employee fringe benefit programs which are subject to change, this manual is also subject to change.

We reserve the right to revise, add, subtract, correct, delete or update any part or all of the materials in this Policy Statement.

Any changes made in this Policy Statement will be brought to the attention of all employees by employee meetings, posting of the change on the employee bulletin boards, or corrections in the Policy Statement itself.

Agencies' Endorsement and Commitment

We, the undersigned representatives, are firmly committed to providing equal employment opportunities, affirmative action, and an equitable service delivery system. The undersigned agencies, their departments and personnel are responsible for implementing this policy.

We commit ourselves and our agencies to equal opportunity, affirmative action and an equitable service delivery system. We pledge to support and oversee the implementation of this equal opportunity/affirmative action policy statement in an equitable and fair manner.

We agree that the City of Eau Claire's Equal Opportunity/Affirmative Action Officer shall serve as our EO/AA Officer. The EO/AA Officer shall develop, implement and maintain our EO/AA plans and programs.

Dated: 10/27/10 City of Eau Claire
By: [Signature]

Dated: 10/08/2010 L. E. Phillips Memorial Public Library
By: [Signature]
Eau Claire City/County Health Department

Dated: 10/8/2010 By: [Signature]

Housing Authority of the City of Eau Claire
Dated: 10-8-2010 By: [Signature]

Equal Opportunity/Affirmative Action Officer's Endorsement

As the City's Equal Opportunity/Affirmative Action Officer, I pledge to implement this EO/AA policy statement, in a lawful, equitable and fair manner. I pledge to make this Policy Statement available to all employees, client/service recipients, groups, agencies, vendors, contractors, subcontractors and companies within the community. I also agree to serve as the EO/AA Officer for the agencies listed above.

Dated: 11-5-2010 Jan M. Dole
(Printed name of Equal Opportunity/Affirmative Action Officer)

[Signature]
(Signature)

AFFIRMATIVE ACTION POLICY

Our affirmative action efforts are intended to prevent unlawful discrimination of employees and client/service recipients.

Hiring

We will identify ourselves as equal opportunity employers. We will use selection criteria, policies, and tests that indicate job skills, knowledge, aptitudes, and other job-related information. Our selection procedures will not unlawfully exclude applicants by age, race, creed, color, religion, physical or mental impairments, marital status, military service, gender, pregnancy, ancestry, use or non-use of lawful products off of our premises during non-working hours, national origin, sexual orientation, arrest record or conviction record.

We will seek to maintain the confidentiality of information collected for affirmative action/equal opportunity (AA/EO) purposes. It may, however, be used to document our affirmative action efforts, to inform supervisors and managers of work restrictions or necessary accommodations, to alert first aid or safety personnel to any conditions that require special emergency treatment, to help government officials investigate compliance with applicable regulations or any other non-discriminatory purpose.

Promoting and Transferring

In promoting, transferring and making other employment-related decisions, applicants and employees will not be unlawfully discriminated against because of their age, race, creed, color, religion, physical or mental impairment, marital status, military service, gender, pregnancy, ancestry, use or non use of lawful products off of our premises during non-working hours, national origin, sexual orientation, arrest record or conviction record.

Filing Complaints

All individuals with information concerning a possible violation of this Policy Statement, including Complainants, shall file a written complaint with the AA/EO Officer, Director of Human Resources or Agency Director within 30 days of the alleged violation. At their discretion, the AA/EO Officer, Director of Human Resources or Agency Director may extend the 30 day period if the Complainant so requests.

AA/EO complaints shall provide specific details of the alleged violation and offer a recommended solution. Upon receiving a complaint, the AA/EO Officer, Director of Human Resources or the Agency Director (or designee) shall promptly initiate an investigation of all AA/EO complaints. Investigations will be commenced within 10 business days unless extenuating circumstances exist. Investigators shall consider privacy concerns when conducting investigations. Investigators will

ordinarily question individuals having knowledge of either the specific allegation or similar matters. Investigators should document their findings.

After completing the investigation, the Officer/Director shall promptly notify the Complainant in writing of the findings of the investigation and the proposed resolution, if applicable. The findings and recommendations will ordinarily be provided within 10 business days unless extenuating circumstances exist.

Retaliation Prohibited

We will not retaliate against any individual for opposing practices that violate this Policy Statement or for filing a complaint, testifying or participating in any way in an investigation, proceeding or litigation. If an employee or client/service recipient believes that he or she is being retaliated against, that employee/client/service recipient shall follow the complaint and appeal process detailed above.

Review and Record-keeping

Each year the AA/EO Officer will consider the effectiveness of this Policy Statement and evaluate the need for change. The Affirmative Action Officer will evaluate whether changes will promote nondiscrimination in employment/delivery of services. The AA/EO Officer shall maintain, for three years, records showing complaints filed, reviews conducted, investigations, decisions reached, corrective actions taken and the reason(s) for the decision.

WORKFORCE ANALYSIS

Biennially, we shall conduct a workforce analysis of the ethnic and sexual composition of our workforce. We shall list every job title according to the applicable collective bargaining agreement or our payroll records and rank each job from the lowest-paying to the highest-paying. We will create a table showing, for each job title, the wage rate, and our current workforce by gender, race, and national origin. After conducting the workforce analysis, we will conduct an availability analysis, based on the then most recent census statistics to determine the availability of females and minorities in the appropriate labor market for each job group. Specifically, we will determine the availability of minorities and females for each job group by examining and quantifying the following factors:

1. The minority population of the labor area in which we are located and the availability of females seeking employment in the labor area;
2. The percentage of minorities and females who are unemployed in our area.
3. The percentage of the minority and female workforce as compared with the local workforce in our area;
4. The availability of minorities and females possessing the requisite skills in our area;
5. The availability of minorities and females possessing the requisite skills in an area in which we can reasonably recruit;
6. The availability of promotable and transferable minorities and females in our organization;
7. The existence of training institutions capable of training persons in the requisite skills; and
8. The degree of training which we can reasonably be expected to provide in order to open additional job classifications to minorities and women.

After conducting the availability analysis, we will determine whether women or minorities are underutilized in any of the job groups in our work force. Underutilization exists if any of the job groups contain fewer minorities or women than would reasonably be expected considering their availability in the local labor market area.

If underutilization exists in any of our job groups, we will establish goals designed to correct such underutilization. We will set specific goals, designed to match the percentage representation of minorities and females to their availability for each of the job groups. We will also set timetables for achieving these goals and disseminate this information to our employees and the general public.

SEX DISCRIMINATION POLICY

We will not unlawfully discriminate on the basis of gender. We adopt and agree to comply with the Equal Employment Opportunity Commission's guidelines on sex discrimination. These guidelines overrule any of our pronouncements or policies which are inconsistent with the Commission's guidelines or other laws or regulations. Our sex discrimination policy applies to all phases of employment and delivery of services.

Job Classification

We will not classify jobs by gender or establish gender based lines of progression or seniority. We will not use classifications to disguise sex discrimination. Personnel involved in employment decisions will not unlawfully express gender-based preferences, limitations or specifications.

Bona Fide Occupational Qualification

When gender is a bona fide occupational qualification, we may confine consideration of applicants to those of a specific gender. We will not refuse to hire an applicant because of his or her sex based on comparative employment characteristics of men or women, characteristics of the sexes or on consideration of the preferences of co-workers, supervisors, clients or client/service recipients.

Advertising Job Opportunities

When advertising a position we will not indicate a gender preference, limitation or specification, unless gender is a bona fide occupational qualification for that position. Unless a position has a bona fide occupational qualification for a specific gender, we will not use employment agencies which refuse to represent both men and women.

Fringe Benefits

In the event that we decide to provide a fringe benefit, we will provide male and female employees with comparable fringe benefits. The same benefits will be provided for spouses and families of employees, regardless of their sex or whether the cost of benefits for members of one gender is greater than for the other. Our fringe benefit programs, funds, and insurance will comply with the Equal Employment Opportunity Commission's then most recent guidelines.

Policies Relating to Pregnancy and Childbirth

Impairments relating to pregnancy, childbirth, or other related medical conditions will be treated in the same way as other medical conditions. We will not discriminate against applicants or employees because of pregnancy, childbirth, or related medical conditions.

Filing Complaints

All individuals with information concerning a possible violation of this Policy Statement, including Complainants, shall file a written complaint with the AA/EO Officer, Director of Human Resources or Agency Director within 30 days of the alleged violation. At their discretion, the AA/EO Officer, Director of Human Resources or Agency Director may extend the 30 day period if the Complainant so requests.

AA/EO complaints shall provide specific details of the alleged violation and offer a recommended solution. After receiving a complaint, the AA/EO Officer, Director of Human Resources or the Agency Director (or designee) shall promptly initiate an investigation of all AA/EO complaints. Investigations will be commenced within 10 business days unless extenuating circumstances exist. Investigators shall consider privacy concerns when conducting investigations. Investigators will ordinarily question individuals having knowledge of either the specific allegation or similar matters. Investigators should document their findings.

After completing the investigation, the Officer/Director shall promptly notify the Complainant in writing of the findings of the investigation and the proposed resolution, if applicable. The findings and recommendations will ordinarily be provided within 10 business days unless extenuating circumstances exist.

Retaliation Prohibited

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Review and Record-keeping

Each year the AA/EO Officer will consider the effectiveness of this Policy Statement and evaluate the need for change. The Affirmative Action Officer will evaluate whether changes will promote nondiscrimination in employment/delivery of services. The AA/EO Officer shall maintain, for three years, records showing complaints filed, reviews conducted, investigations, decisions reached, corrective actions taken and the reason(s) for the decision.

UNLAWFUL HARASSMENT AND SEXUAL HARASSMENT POLICY

We oppose sexual discrimination, sexual harassment and unlawful harassment on the basis of age, race, creed, color, religion, physical or mental status, military status, gender, pregnancy, ancestry, use or nonuse of lawful products off our premises during non-working hours, national origin, sexual orientation, arrest record, or conviction record in any area of employment or delivery of services. We prohibit verbal, physical, visual and sexual harassment. Verbal harassment includes racial, sexual, or ethnic jokes or insults. Physical harassment includes unwelcome touching, grabbing and pinching. Visual harassment includes sexually suggestive pictures, posters, photographs, or cartoons, as well as materials intended to reflect negatively on an individual's race, national origin, ancestry or sexual orientation.

Sexual harassment includes unwelcome sexual advances, requests for sexual favors, and other verbal or physical conduct of a sexual nature when submission to or rejection of this conduct explicitly or implicitly affects an individual's employment, unreasonably interferes with an individual's work performance or creates an intimidating, hostile or offensive work environment.

Sexual harassment can occur in a variety of circumstances, including but not limited to the following:

- The victim as well as the harasser may be a woman or a man.
- The victim does not have to be of the opposite sex.
- The harasser can be another employee, the victim's supervisor or a supervisor in another area.
- The victim does not have to be the person harassed but can be anyone affected by the offensive conduct.
- Unlawful sexual harassment may occur without economic injury to or discharge of the victim.
- The harasser's conduct must be unwelcome.

Here are some examples of sexual harassment which we prohibit:

1. Explicit or implicit promise of career advancement in return for sexual favors (e.g., promotion, training, awards, job assignments, lax time-keeping, lower standards of performance);

2. Explicit or implicit threats that the victim's career will be adversely affected if the sexual demands are rejected (e.g., nonpromotion, poor performance appraisal, reassignment to a less desirable position/location);
3. Deliberate, repeated, unsolicited verbal comments, gestures or physical actions of a sexual nature (e.g., touching, pinching, or patting another person.)
4. Displaying sexually explicit photographs or making sexually explicit jokes.

We forbid our agents, supervisors, and employees from engaging in any form of sexual harassment. Substantiated violations may result in disciplinary action, including dismissal. Conduct or actions that arise out of a personal or social relationship that are not intended to have a discriminating employment affect may not be viewed as harassment. We reserve the right to determine whether such conduct constitutes sexual harassment, based on a review of the facts and circumstances of each situation. The AA/EO Officer will oversee a program informing employees of this policy. As part of this program, the policy will be posted and supervisory personnel will be specifically informed that they are responsible for working to prevent such unlawful harassment and to take appropriate action if it does occur.

Filing Complaints

All individuals with information concerning a possible violation of this Policy Statement, including Complainants, shall file a written complaint with the AA/EO Officer, Director of Human Resources or Agency Director within 30 days of the alleged violation. At their discretion, the AA/EO Officer, Director of Human Resources or Agency Director may extend the 30 day period if the Complainant so requests.

AA/EO complaints shall provide specific details of the alleged violation and offer a recommended solution. After receiving a complaint, the AA/EO Officer, Director of Human Resources or the Agency Director (or designee) shall promptly initiate an investigation of all AA/EO complaints. Investigations will be commenced within 10 business days unless extenuating circumstances exist. Investigators shall consider privacy concerns when conducting investigations. Investigators will ordinarily question individuals having knowledge of either the specific allegation or similar matters. Investigators should document their findings.

After completing the investigation, the Officer/Director shall promptly notify the Complainant in writing of the findings of the investigation and the proposed resolution, if applicable. The findings and recommendations will ordinarily be provided within 10 business days unless extenuating circumstances exist.

Retaliation Prohibited

We will not retaliate against any individual for opposing practices that violate this Policy Statement or for filing a complaint, testifying or participating in any way in an investigation, proceeding or litigation. If an employee or client/service recipient believes that he or she is being retaliated against, that employee/client/service recipient shall follow the complaint and appeal process detailed above.

Review and Record-keeping

Each year the AA/EO Officer will consider the effectiveness of this Policy Statement and evaluate the need for change. The Affirmative Action Officer will evaluate whether changes will promote nondiscrimination in employment/delivery of services. The AA/EO Officer shall maintain, for three years, records showing complaints filed, reviews conducted, investigations, decisions reached, corrective actions taken and the reason(s) for the decision.

AGE DISCRIMINATION POLICY

We will not use age as a basis to unlawfully discriminate against employees, job applicants or client/service recipients. In all other employment matters, applicants and employees will not be unlawfully differentiated by age. Applicants may be asked on application forms whether they are at least 18 years of age. No other inquiries shall be made regarding age and no age restrictions shall be placed upon a job unless the inquiry or restriction directly relates to a bona fide occupational qualification.

Programs and Activities

Individuals will not be excluded from, denied the benefits of, or subjected to discrimination on the basis of age under a program or activity which receives Federal or State financial assistance, nor shall they be denied or limited in their opportunity to participate in such a program or activity. We may, however, offer special programs for older persons or for children.

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PERSONS WITH PHYSICAL OR MENTAL IMPAIRMENTS POLICY

We will not unlawfully discriminate against qualified persons with physical and/or mental impairments. Our employment practices and service delivery systems will comply with all applicable governmental regulations. We will not refuse to hire or otherwise discriminate against a job applicant with an impairment who is capable of performing the essential functions of the job with or without reasonable accommodations.

In employing persons with physical or mental impairments, we will emphasize ability, relate employment to job performance, and seek to reasonably accommodate the physical needs of our employees. We will not use selection criteria, policy or tests that disadvantage applicants with physical or mental impairments unless the procedures are directly related to the position's essential functions. The criteria, policy, and tests will measure job skills and aptitudes, or other relevant factors, rather than reflecting the applicant's or employee's impaired sensory, manual, or speaking skills, except where those are the skills intended to be measured.

Applicants may be required to submit to medical examinations or evaluations, provided that such procedures are part of our regular employment procedure. Only job-related medical criteria will be considered in any job decision. Employees may voluntarily identify any impairment they have after they have been hired.

We will consider providing appropriate auxiliary aids to applicants, employees and clients/service recipients with impaired sensory, manual, or speaking skills when such aids are necessary to prevent a qualified person with a physical or mental impairment from being subjected to discrimination, being excluded from participating in, or being denied the benefits of a program or activity.

Clients/service recipients with a physical or mental impairment may receive a different or separate aid, benefit, or service only when such action is necessary to provide the individual with benefits or services provided to others. This does not mean, however, that the aid, benefit, or service must provide the client/service recipient with the identical result as persons without such impairments.

Reasonable Accommodation

Unless an accommodation would impose an undue hardship, we will make reasonable accommodation for the known physical and mental limitations of qualified applicants or employees. We will consider a range of possible accommodations to provide individuals the opportunity to perform the essential functions of a job. We are not required to create new job positions (i.e. a "light duty" position).

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APPENDIX

Analysis of Impediments to Fair Housing

ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING CHOICE

City of Eau Claire Housing Division
Eau Claire, Wisconsin



April 2010

Prepared by:



In coordination with the
City of Eau Claire Housing Division
Kerry Kincaid, City Council President
Mike Huggins, City Manager
Keith Johnathan, Director, Housing Division

INTRODUCTION

Fair Housing

Fair Housing is the right for all people to obtain housing, of their choice, without discrimination. The Federal Civil Rights Act and Fair Housing Amendments established protected classes - - group identity categories of race, color, national origin, religion, sex, family status, and disability. It is the goal of the Eau Claire Housing Division and this study to help the City of Eau Claire address any issues that affect all people from obtaining safe, sanitary, and affordable housing.

Historical Overview of Federal Fair Housing Activities

Provisions to Affirmatively Further Fair Housing (AFFH) are main components of the U.S. Department of Housing and Urban Development's (HUD) housing and community development programs. These provisions flow from the mandate of Section 808(e)(5) of the Fair Housing Act which requires the Secretary of HUD to administer the Department's housing and urban development programs in a manner to affirmatively further fair housing.

Through its Community Planning and Development (CPD) programs, HUD's goal is to expand mobility and widen a person's freedom of choice.

HUD's housing and community development program regulations, handbooks, and notices require all State and Entitlement jurisdictions and HUD-assisted/insured housing providers administer all awards according to the Fair Housing Act.

The Community Development Block Grant (CDBG) program contains a regulatory requirement of affirmatively furthering fair housing upon HUD's obligation under Section 808 of the Fair Housing Act. The CDBG regulation also reflects the CDBG statutory requirement that the grantees certify that they will affirmatively further fair housing. The HOME program regulation states the statutory requirements from the Comprehensive Housing Affordability Strategy (CHAS) that the jurisdictions must affirmatively further fair housing.

HUD has required Community Development (CD) grantees (those State and Entitlement jurisdictions that administer the above identified CPD Programs) to document AFFH actions in the CDBG and CHAS annual performance reports that are submitted to HUD.

Legislative changes in HUD programs and subsequent HUD program regulations require CD grantees to certify that they will affirmatively further fair housing as part of the obligations assumed when they accept HUD program funds.

State of Wisconsin Fair Housing Activities

The State of Wisconsin has incorporated its own equal housing laws, which surpass many other states in providing the protection of all citizens. The State law includes protection for all special classes as listed in the Federal fair housing laws and adds additional classes. Wisconsin's fair

housing laws are enforced locally and at the state level by the Wisconsin Department of Workforce Development (DWD) Equal Rights Division. Knowledge and utilization of both state and federal fair housing regulations provide the City of Eau Claire numerous resources and references from which to promote fair housing throughout the area.

Summary of Analysis of Impediments

This Analysis of Impediments to Fair Housing and Action Plan is being completed by the City of Eau Claire to fulfill the U.S. Department of Housing and Urban Development's requirement that all entitlement grantees undertake fair housing planning as part of the Consolidated Plan, Comprehensive Plan, and Annual Grantee Performance report.

The federal fair housing planning process includes the following requirements:

- Analysis of impediments to fair housing choice
- Actions taken to address identified impediments
- Recordkeeping

Definition of Impediments to Fair Housing Choice

Impediments to fair housing choice are defined as:

- Any actions, omissions, or decisions taken because of race, color, religion, sex, disability, familial status or national origin that restrict housing choices or the availability of housing choice, or
- Any actions, omissions, or decisions that have this effect.

Policies, practices, or procedures that appear neutral on their face, but which operate to deny or adversely affect the availability of housing to a person may be considered an impediment.

BACKGROUND INFORMATION – CITY OF EAU CLAIRE

Eau Claire is a community of approximately 65,950 persons and 26,046 households (Source: Wisconsin Department of Administration and 2006/2008 American Community Survey 3-Year Estimate) in west-central Wisconsin. Founded at the confluence of the Eau Claire and Chippewa Rivers in the mid-1800's, the community has advanced from dependence on timber industries and farming to a variety of manufacturing industries (high technology products, steel, plastic and paper goods), education (the University of Wisconsin-Eau Claire and Chippewa Valley Technical College), regional health care, retail sales and other service industries.

Eau Claire has seen steady and consistent growth over the past forty years. This growth can be largely attributed to continued strong enrollments at the campuses of the University of Wisconsin Eau Claire and Chippewa Valley Technical College, the expansion of local hospitals and clinics, the growth of businesses serving an expanding regional market, and the attraction of new companies to the area.

A similar rate of growth is forecasted to continue for the next two decades, as the City is expected to add about 3,000 households every ten years.

Eau Claire has placed emphasis on balanced, orderly growth, historic preservation, downtown revitalization, neighborhood reinvestment, and comprehensive planning. New development has proceeded outward consistent with the City's Comprehensive Plan. Varieties of housing types are planned for each sector of the community and arranged into identifiable, well-serviced neighborhoods. New commercial and industrial development is generally separate and buffered from residential areas.

The local economy is generally stable because of the educational components, the growth of two major hospitals and their associated clinics, and Eau Claire being a regional service center for retail trade and professional services.

However, as with older cities, there are several neighborhoods that are experiencing housing deterioration, disinvestment, aging public infrastructure, crime, and a concentration of households with low-incomes. In addition, changes in the local economy have resulted in changes in the job market.

POPULATION

General Growth

The growth of population in Eau Claire has increased steadily over the past several decades and it is forecasted to continue at a similar rate, as indicated by Table 1.

Between 1980 and 1990, the City of Eau Claire's population increased by 10.4%, between 1990 and 2000 it increased again by 8.5%, and the population is estimated to have increased an additional 6.9% between 2000 and 2009 (see Tables 1 & 2).

Table 1. Change in Population

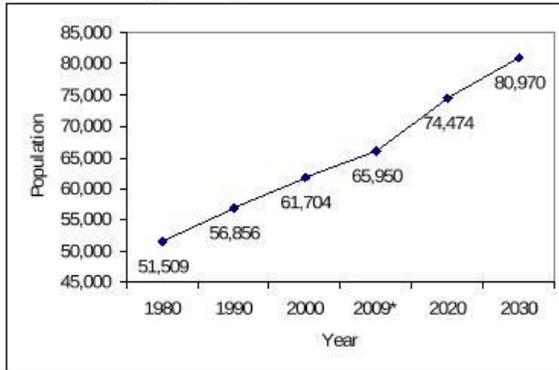


Table 2. Change in Population Data

Year	Population
1960	37,967
1970	44,619
1980	51,509
1990	56,856
2000	61,704
2009*	65,950
2020	74,474
2030	80,970

Source: U.S. Census of Population and Wisconsin Dept. of Administration * 2009 DOA Estimated Population

Families made up 54.8% of the Eau Claire population compared to 65.2% for the State. In Eau Claire, there was a 3% decrease in families since 2000. Single-person households were 32.8% of the local population compared to 28.3% for Wisconsin.

The average number of persons per household in Eau Claire is 2.29 and the average number of persons per family is 2.94. Statewide, the average number of persons per household in 2006/2008 was 2.43; this figure is down from 2000, where the average number of persons per household was 3.05 (see Table 3).

Table 3. 2006/2008 Demographic Comparison with State

	Eau Claire	Wisconsin
Median Age	30.5	37.9
% of Population 19 Years and Under	26.0%	26.4%
Total Household	26,046	2,236,518
Average Persons Per Household	2.29	2.43
Total Families	14,262	1,458,972
Average Persons Per Family	2.94	2.99
% Male	48.4%	49.7%
% Female	51.6%	50.3%

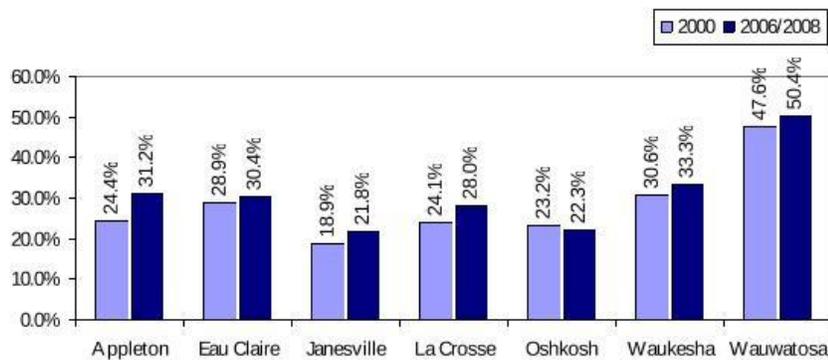
Race (Percent Distribution)		
White	92.7%	87.6%
African America/Black	1.1%	5.9%
American Indian	0.8%	1.0%
Asian	4.2%	2.0%
Other	0.2%	2.1%
Two or More Races	1.0%	1.4%
TOTAL	100.0%	100.0%

Source: 2006/2008 American Community Survey 3-Year Estimate

EDUCATION

The percentage of the Eau Claire population who attained a Bachelor's Degree or higher education increased from 28.9% in 2000 to 30.4% in 2006/2008. Table 4 compares the percentage of education attainment for Eau Claire and Wisconsin cities of similar size to Eau Claire. Typically, there is a correlation between higher income and higher education.

Table 4. Education Attainment, Bachelor's Degree or Higher (%)



Source: 2000 U.S. Census and 2006/2008 American Community Survey 3-Year Estimate

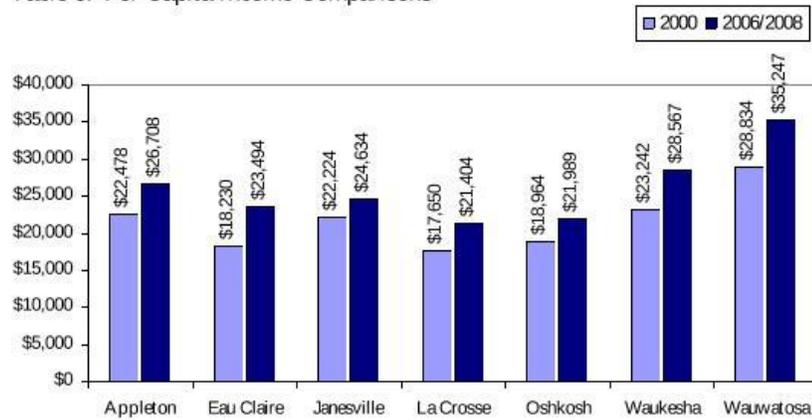
SPECIAL GROUPS

According to the 2006/2008 American Community Survey, Eau Claire has a large population of people of Asian descent with many of these from the Hmong tribes of Laos. The Survey estimates 2,736 persons of Asian descent, which is up slightly from 2000.

The percentage of households with children headed by a single female continues to increase consistent with national trends. In 2006/2008, 5.7% of all Eau Claire households had a female head and children present, a slight increase from 2000 at 5.3%. These households are often of low and moderate income and face other sources of stress related to family responsibilities.

The incidence of poverty is much higher among the racial minority households, particularly the Asian and Pacific Islanders within Eau Claire. According to the 2006/2008 American Community Survey 3-Year Estimate, the median family income for Eau Claire is \$61,492 which is lower than the national median family income. The per capita income for Eau Claire is compared with other Wisconsin cities in the year 2000 and 2006/2008 (see Table 5).

Table 5. Per Capita Income Comparisons



Source: 2000 U.S. Census and 2006/2008 American Community Survey 3-Year Estimate

RACE

Concentration of Racial or Ethnic Minorities

The number and concentration of racial or ethnic households has increased dramatically from 1980 to 2008. In 1980, no Census Tract had more than 2.01% of its population as members of Black, Hispanic, Native American, Asian or Pacific Islander or other non-White, non-Hispanic group.

By 2000, these Census Tracts had more than 8.9% racial or ethnic minorities. In 2006/2008, this rate has remained the same.

Racial Discrimination

Few discrimination complaints have been filed in recent years through the City of Eau Claire Housing Division; various issues have been identified with regard to Eau Claire's Hmong population. These issues can be summarized in three main areas; 1) language barriers, 2) some degree of racial discrimination, and 3) lack of affordable rental units. In response, the City of Eau Claire will continue to actively fund the Housing Liaison position at the Hmong Association. The Housing Liaison works on behalf of the Hmong Community to find housing to rent or purchase. The City is also reviewing the possibility of sponsoring additional fair housing education for the community's housing-related organizations to deal with all fair housing issues, including racial discrimination.

Discrimination Against Protected Classes

The disabled population, victims of domestic abuse, single-parent households, and families on public assistance are all protected classes which have experienced various impediments to fair housing choice in the city. In response, the City of Eau Claire sponsored fair housing seminars to educate advocates of these special groups to help define the issues and further their fair housing choices.

Through the Eau Claire Area Continuum of Care, many issues regarding these protected classes have been discussed. Continuum of Care members have also set aside various percentages of their federal Continuum of Care grant dollars to assist these special populations with homeless case management and housing assistance.

The Housing Authority of the City of Eau Claire has also placed a large number of these protected classes into subsidized housing programs such as public housing, vouchers and HOME tenant based rental assistance.

HOUSING DEMAND

The demand for housing in Eau Claire had leveled off, as evidenced by the higher vacancy rates since 2000 (see Table 6) and the economy of the area. Approximately 2,307 housing units were built between 2000 and 2004 while only 389 housing units were built in 2005 or later.

Table 6. Eau Claire Occupancy/Vacancy Comparison

	2000	% Total	2006/2008	% Total
Occupied Housing Units	24,016	96.5%	26,046	94.5%
Vacant Housing Units	879	3.5%	1,511	5.5%
Total Housing Units	24,895	100.0%	27,557	100.0%

Source: 2000 U.S. Census and 2006/2008 American Community Survey 3-Year Estimate

Housing for Low- and Moderate Income Households

Even with the new units, the choices available to low- and moderate-income households continue to be limited. In 2005, the average sale price of a house in Eau Claire was almost \$132,200. Lower-cost houses are available, but they are often in need of major repair. Rents have increased significantly, with surveys indicating that more affordable, decent rental may be needed (see Table 7).

Table 7. Change in Housing Costs, 1980-2005

Year	Average Price for a New Single Family House	Average Price for All Single Family Houses	Median Contract Rent
1980	\$ 53,422	\$41,000	\$174
1990	\$100,595	\$55,800	\$284
2000	\$123,608	\$92,800	\$485
2005	\$156,217	\$132,200	

Source: City of Eau Claire – Department of Community Development

Attached and Rental Housing Stats

It is notable that from 1990 to 2005, 56% of all new housing constructed in Eau Claire since 1990 has been duplex or other multiple-family buildings. The addition of these types of units helps relieve some of the cost pressure on rental housing. However, since the overall vacancy rate is low, the effect may have mitigated what would have been an even greater increase in housing costs.

In addition, the range of choice in style, quality, and cost in the rental and multi-family housing in and around Eau Claire is very limited, leaving this as an undesirable choice for many households.

Still, the most significant housing problem in Eau Claire is the need for HUD subsidized housing units, especially with two bedrooms that are decent, safe, and sanitary. The housing construction industry has been creating units for those who can pay high rents, but not enough older units have been made available to keep pace with the demand. The public and the not-for-profit private sectors have not been able to make up the difference.

HOUSING CONDITIONS

Age of Housing

The owner-occupied housing stock of Eau Claire has been constructed proportionate to household growth over the years. According to the 2006/2008 Census data, there were a total of 27,557 housing units in Eau Claire, 26,046 of those units are occupied, and 15,369 of those units were owner-occupied units.

Approximately 40% of all owner-occupied units and 34% of all renter-occupied were built in 1959 or earlier, 39% of all owner-occupied units and 42% of all renter-occupied units were built between 1960 and 1989, and 21% of all owner-occupied and 24% of all renter-occupied units were built in 1990 or later. This data shows that the majority of housing in Eau Claire is older, may require increased maintenance and/or upgrades, and any home built before 1950 can be assumed to contain lead based paint with those built between 1950 and 1960 at high risk for containing lead based paint.

Housing Cost

The cost of housing in Eau Claire, while still significantly lower than in major metropolitan areas such as the Twin Cities or Milwaukee, has risen dramatically since 1980, as indicated by Table 7. The average price of a new house in Eau Claire in 2005 was \$156,200. Unfortunately, this problem affects certain households in disproportionate numbers:

- Single-parent families
- The elderly
- The handicapped
- The disabled
- Members of minority groups, especially Southeast Asians

A promising trend, likely due to the economy, shows housing prices dropping slightly. A search of homes for sale in Eau Claire in the spring of 2010 indicates a number of lower price homes for sale.

Census data support the well-known fact that households in the lower income brackets tend to pay a higher percentage of their incomes for housing than do households in the higher brackets. It is not uncommon for households in the lowest quarter of the income scale to pay 35 to 50 percent of their gross income for rent.

Rental rates have risen in similar fashion, in part because the local housing construction industry has not kept up with the population and economic growth.

HUD defines affordable housing as housing (for rent or purchase) for which the occupant is paying no more than 30% of their household income for gross housing costs. The 2006/2008 American Community Survey 3-Year Estimate data supports the fact that in 2006/2008, 28.9% of Eau Claire owner-occupied households have a monthly housing cost of more than 30% of their household income, which has risen from 15.1% in 2000. The number of renter-occupied households with a monthly housing cost of more than 30% of their household income also grew from 27.6% in 2000 to 50.7% in 2006/2008 (see Table 8).

Table 8. Monthly Housing Cost as a Percentage of Household Income by Housing Units
Number of Housing Units based on Cost as a % of Household Income

Year	Less than 20.0 %	20.0 – 24.9%	25.0 – 29.9%	30.0 – 34.9%	35% or More	Total Housing Units
2000						
Owner Costs	7,643	1,747	1,140	568	1,300	12,398
Renter Costs	3,761	1,415	1,164	814	2,730	9,884
2006/2008						
Owner Costs	3,881	1,916	1,570	742	2,259	10,368
Renter Costs	2,646	1,229	1,218	852	4,389	10,334

Source: 2000 U.S. Census and 2006/2008 American Community Survey 3-Year Estimate

Structural Conditions

Stabilizing and improving the housing stock is a constant issue in Eau Claire because of the large number of older units. Fortunately, a 2004 exterior conditions survey revealed some improvement in the situation since the prior survey in 1998, and programs to assist with rehabilitation have helped.

This affects households of low and moderate incomes who cannot afford sound housing and are forced to rent rather than own. Housing deterioration tends to be concentrated in the older, central neighborhoods although there are scattered instances of physical problems throughout the City.

Overcrowding

The extent of overcrowding in rental housing has increased. The problem is most severe among the lower-cost rental units, which tend to be occupied by households of very-low (under 50 percent of the median) and low income (under 80 % of the median). The 2000 U.S. Census shows that 12.4% of housing units occupied by households below poverty have more than one occupant per room.

The supply of very large (three or more bedrooms) housing units that are affordable to low-or moderate-income households is shrinking because of demolitions. Newer houses with four or five bedrooms are too expensive for those in low-income households. Thus, large low-income households are forced into overcrowded situations.

UPPER-COST HOUSING

The City of Eau Claire has been capturing a progressively smaller share of the most expensive housing in the metropolitan area. Much of that portion of the housing market has been going to locations outside the City, such as northern Washington Township, western Seymour Township, or Pleasant Valley Township. Those areas have attractive wooded lots desirable by households that wish to build a house in the \$250,000 to \$750,000 range.

It is in the interest of the City of Eau Claire to capture such housing not just for the tax base it provides but also, and perhaps more importantly, for the potential civic support of the household members. It is important to avoid creating an "us versus them" mentality in which the most affluent members reside outside the City and the moderate and low income live in the City. The highly educated professionals, executives, and business owners who can afford the best housing are needed to help guide the City toward its best possible future.

Thus, the City needs to diversify and expand its housing stock on both the ends of the spectrum.

HOUSING ASSISTANCE PROGRAMS

Housing Assistance Programs and Inventory Owned and Operated by Housing Authority

The assisted housing inventory in Eau Claire is summarized in Table 9.

Table 9. Assisted Housing Inventory

Category	Number of Housing Units
Public Housing	109
Section 8 Vouchers and Portable Vouchers	405
HOME Tenant Based Rental Assistance	50-55
Affordable Housing	9
Home Ownership	13
Park Tower Apartments & Townhouses	152
Owen Rust Apartments	23
Substantial Rehabilitation	6

Source: City of Eau Claire – Housing Authority

Rental Assistance Programs

The Eau Claire Housing Authority administers federal rent assistance programs as listed below.

Table 10. Eau Claire Housing Authority Programs

Project / Location	Property Ownership	Number Of Units	Elderly Family		Handicap Accessible Units
			Elderly	Family	
Park Tower Apts & Townhouses (Sec. 8)	Housing Authority	152	122	30	15
Owen Rust Apartments	Housing Authority	23	23	0	2
Public Housing (Scattered Sites)	Housing Authority	68	0	68	3
Duplexes Single-Family	Housing Authority	41	0	41	1
Affordable Housing	Housing Authority	9	0	0	2
Substantial Rehabilitation	Housing Authority	6	0	8	2

Source: City of Eau Claire – Housing Authority

HOUSING NEEDS

The Eau Claire housing stock is suitable for many groups of people because it is highly varied, having been created over the decades by many builders. The stock is most amenable to households, including those with children, who can afford to buy a single-family house at market process. However, there is also a good supply of apartments and converted houses that are rented to young singles and couples, college students and lower-income families or households.

However, there are several population groups that struggle to find suitable housing that they can afford in Eau Claire. The portions of the Eau Claire population that have special needs are listed below.

The Homeless

The homeless and those threatened with homelessness, after receiving emergency housing assistance, have difficulty making the transition to permanent housing. There is an insufficient number of temporary shelter beds, particularly for homeless families, in Eau Claire. There is also not enough decent low-cost housing units for these people. Consequently, there is overcrowding, frequent change, and great insecurity.

Large Families

The housing stock is least suited to large, low-income families who need four or more bedrooms. Very large units are most often found in the more expensive single-family houses, which are out of the financial reach of such families.

The Chronically Mentally Ill

This portion of the population needs several kinds of assistance, housing being one of them. There are not enough low-cost housing units for this population, particularly housing units with supervision or help.

People with Physical Disabilities

A portion of the assisted housing in Eau Claire is designed and reserved for this population but it is estimated that the need is greater than the supply.

The Frail or Low-Income Elderly

With the trend toward longer lives, it can be expected that an increasing percentage of the population will encounter the types of physical, social, psychological or economic conditions that make continued independence more difficult but for which institutional care is expensive and not appropriate. It would be helpful if the housing needs of these people could be met through programs that keep them safely in their homes as long as possible.

The elderly who can no longer maintain a single-family house and may need daily assistance and companionship have seen an increase in choices in the community because of the surge in new construction of a number of housing complexes between 2000 and 2009. Keeping this growing segment of the population in their homes and providing in-home assistance may be an effective approach to containing housing cost for this group.

People with AIDS

The difficulty of obtaining safe, affordable housing is compounded when someone has AIDS or HIV disease. It is assumed that there is discrimination against this population when it comes to obtaining and keeping rental housing, and the lack of adequate housing often prevents their timely discharge from acute care facilities. It may also force them into shelters for the homeless or to move into unstable or unsafe environments.

TOP-PRIORITY HOUSING NEEDS

The greatest housing needs in Eau Claire are listed below, as identified by the Consolidated Plan for Community Development Block Grant, HOME and Housing Programs 2005-2009.

1. Rental subsidies
2. Housing rehabilitation
3. Assist low/moderate income homeowners
4. Reduce Lead Paint Hazards
5. Enforce codes to improve housing conditions and community appearance.

BARRIERS TO AFFORDABLE HOUSING

This section summarizes barriers to affordable housing, impediments to fair housing choice and the opportunities created by the local market for producing rental housing, promoting new homeownership, alleviating overcrowding, and meeting the needs of underserved populations.

Impediments to Decent, Affordable Housing

- Rent levels affordable by the low-income population are not sufficient to support this population.
- The cost of building new housing (whether for-sale or for-rent) exceed what some segments of the population can afford.
- Some affordable housing is being lost because of business expansion, road building, redevelopment projects, and/or simply age and neglect.
- The conversion of large single-family houses to apartments reduces the supply of large units and increases overcrowding.

Opportunities for Decent, Affordable Housing

- Eau Claire has a well-maintained supply of large, older single-family houses that are amenable to rehabilitation.

- New single-family development on the fringes of the community is continuing to create opportunities for resale of older houses to moderate-income households.
- Eau Claire is a community concerned about its members.
- Eau Claire has a good system of city and county government along with a small network of private social service and non-profit housing providers. Together, these organizations address many of the community's housing problems, which are not as unmanageable as those in other large communities are.
- Although temporary, the recent downturn in the housing market has resulted in lower home prices and higher vacancy rates due to foreclosure. This may make more housing affordable to residents.

FAIR HOUSING

The City of Eau Claire has a solid reputation for promoting fair housing choice. Unfortunately, even though City government has a strong commitment to further fair housing, there are some negative influences in the community. It is the City's intention that by using this fair housing plan and through education these adverse influences may be reduced. In addition, education, provides a greater understanding of fair housing issues throughout the community.

ACTIONS TO OVERCOME IMPEDIMENTS

Since the City's original Analysis of Impediments to Fair Housing Choice in 1996, the City has:

- Enrolled two Housing Division employees in Fair Housing Training. The training is a one-year certification course regarding all areas of federal fair housing regulations.
- Presented fair housing training to the local apartment owners association (see attached invites).
- Fair Housing information is found on the City's updated website at www.ci.eau-claire.wi.us/housing-authority/filing-discrimination-complaints
- Provided affirmative action training to the Hmong Mutual Assistance and all agencies requesting Community Development Block Grant Public Service funds.
- Been awarded funding through HUD's Continuum of Care to assist homeless families. The primary focus of the funding provides security deposits and first months rent.
- Sponsored annual fair housing poster contest during the national fair housing week.
- Fair Housing ads are run in the newspaper at least annually.

- Held a Fair Housing meeting with the Hmong Association regarding Affordable Housing.
- Participated in on-going Continuum of Care meetings with other homeless and non-profit agencies. These meetings are held at least six to eight times a year.

The City has also seen:

- A well-maintained supply of large, older single-family houses that are able to be rehabilitated.
- New single-family development on the fringes of the community that continues to create opportunities for resale of older houses to moderate-income households.
- Housing costs that are somewhat lower compared to many other communities.
- A community concerned about its members.
- A good system of city and county government along with a small network of private social service and non-profit housing providers. Together, these organizations strive to address many of the community's housing problems.
- An increase in the homeownership rate among the area's low income and minority populations.
- The addition of 13 houses under the Housing Authority's Homeownership program available to low-income households.
- The addition of 8 low-income apartments constructed in 1998 using Housing Authority revenue bonds.
- The continuing of down payment / closing cost assistance under the City of Eau Claire's HOME Program for first time, low income home buyers.
- The placement of over 460 low-income households through the Housing Authority's Voucher and HOME Program.
- Fair Housing information provided to all landlords participating in the Voucher Program.
- The construction or acquisition of 15 units of transitional housing for homeless families with children under the City's HOME Program.
 - o Housing Authority – Three units
 - o Bolton Refuge House – Eight units
 - o Hmong Association – Two units
 - o Western Dairyland – Two units

- The Housing Authority of the City of Eau Claire has a strong tradition of deconcentrating Vouchers and placing them in nearly all areas of the City.
- The Housing Authority of the City of Eau Claire also has a strong tradition of deconcentrating Public Housing. All Public Housing units are either single-family homes or duplexes. The housing is also scattered throughout the City.
- The annual “Juneteenth” event with both minorities and others participating in activities.
- The participation in a Diversity Study in 2002 and 2003.
- While there is more education and work to be done within the Community on Fair Housing issues, many steps have already been taken.
- Deconcentrating of Homeownership Program units by purchasing units and placing families in nearly all areas of the City.

THE FUTURE

The City of Eau Claire will:

- Continue to educate the public, City officials, owners, landlords, real estate agents, lenders and others about fair housing by holding training sessions with these groups.
- Encourage financial counseling for protected classes prior to receiving a mortgage loan.
- Continue to assist in financing affordable housing.
- Increase the supply of affordable rental units, particularly large size units, by encouraging developers.
- Continue the fair housing poster contest.
- Continue work with groups and organizations that are dedicated to fair housing assistance.
- Track fair housing complaints and identify patterns.
- Continue to use CDBG funds for residential rehabilitation.
- Continue to proactively target code enforcement in areas of older housing stock.
- Continue to test for lead-based paint and asbestos hazards and enforce lead-based paint and asbestos abatement.
- Use Federal, State, and local funding programs to help increase housing stock for senior citizens, large families, and disabled persons.

ATTACHMENTS

Apartment Association Invitations

**Chippewa Valley Apartment Association
and
City of Eau Claire Housing Authority
Join Together to Announce
2007 Fair Housing Seminar
By Kathy Gile**

**Monday April 23, 2007
10:00 -12:00 am
Applicant Screening Procedures and the Law
and
1:00 - 3:00 pm
Creating or Revising Your Screening Program**
Bring any current screening procedures for revision.

at Banbury Place, Eau Claire Room
800 Wisconsin St
Eau Claire WI 54703

\$10.00 fee to paid at the door
Lunch is on your own
RSVP not required



**FAIR HOUSING SEMINAR
&
ILLEGAL DRUGS IN RENTALS**

**Monday, February 13, 2006
1:00 pm – 5:00 pm
Eau Claire Room, Banbury Place, Bldg 2, 3rd Floor**

Sponsored By:

Chippewa Valley Apartment Association
Eau Claire Housing Authority
Eau Claire Police Department

Cost will be \$10 per person

This will be a four- hour program starting at 1:00 pm on Fair Housing with Kathy Gile. Ms. Gile is the past president of the Wisconsin Apartment Association as well as a main speaker throughout Wisconsin on federal and state laws that apply to the landlords. Anyone that has attended her presentations knows the value of this information. This time she is explaining Fair Housing in detail with some screening practices that will help you save time and money.

We will have a half hour break around 3:00 pm to 3:30 pm.

Brian Schneider from the Eau Claire Police Department will start his program at 3:30 p.m. He has a very good film presentation that helps you through the process on how to identify drugs in rentals and what to do about them once you find one. With meth labs growing in the Chippewa Valley, we as landlords can help in the crack down on this problem as well as others. We need to know what we as landlords can and cannot do in these circumstances.

Registration is limited to the first 100 people with payment. So please rush your registration and make the \$10.00 check out to Chippewa Valley Apartment Association.

Mail to: Dale Goshaw (President of the Chippewa Valley Apt. Assoc.)
907 Piedmont Rd
Eau Claire, WI 54703
(715) 836-7507

Fair Housing and Illegal Drugs in Rentals Seminar

Name: _____

Address: _____

City/State/Zip Code: _____

2015 Geographic Distribution

GEOGRAPHIC DISTRIBUTION

Address	Type of Activity	LMI Census Tract or Block Group?	Area of Minority Concern?
Bellevue Ave	Housing Rehab	Yes, 6.01	N
Dewey St	Housing Rehab	Yes, 6.01	N
12 th St	Housing Rehab	Yes, 14	N
Edgewood Ave	Housing Rehab	Yes, 5.01	N
Hodgeboom Ave	Housing Rehab	Yes, 7.01	N
Wellington Ave	Housing Rehab	Yes, 5.01	N
Sherwin Ave	Housing Rehab	Yes, 7.01	N
Badger Ave	Housing Rehab	Yes, 7.01	N
North Ln	Housing Rehab	Yes, 5.01	N
Terry Ln	Housing Rehab	Yes, 5.02	N
4 th St	Housing Rehab	Yes, 14	N
Spring St	Housing Rehab	Yes, 6.01	N
Park Ridge Dr	Weatherization	Yes, 12	N
Abbe Hill Dr	Weatherization	Yes, 5.02	N
Summit St	Weatherization	Yes, 6	N
Gilbert St	Weatherization	Yes, 14	N
Jill Ave	Weatherization	Yes, 9	N
North Ln	Weatherization	Yes, 5.01	N
Rudolph Rd	Weatherization	Yes, 7.01	N